



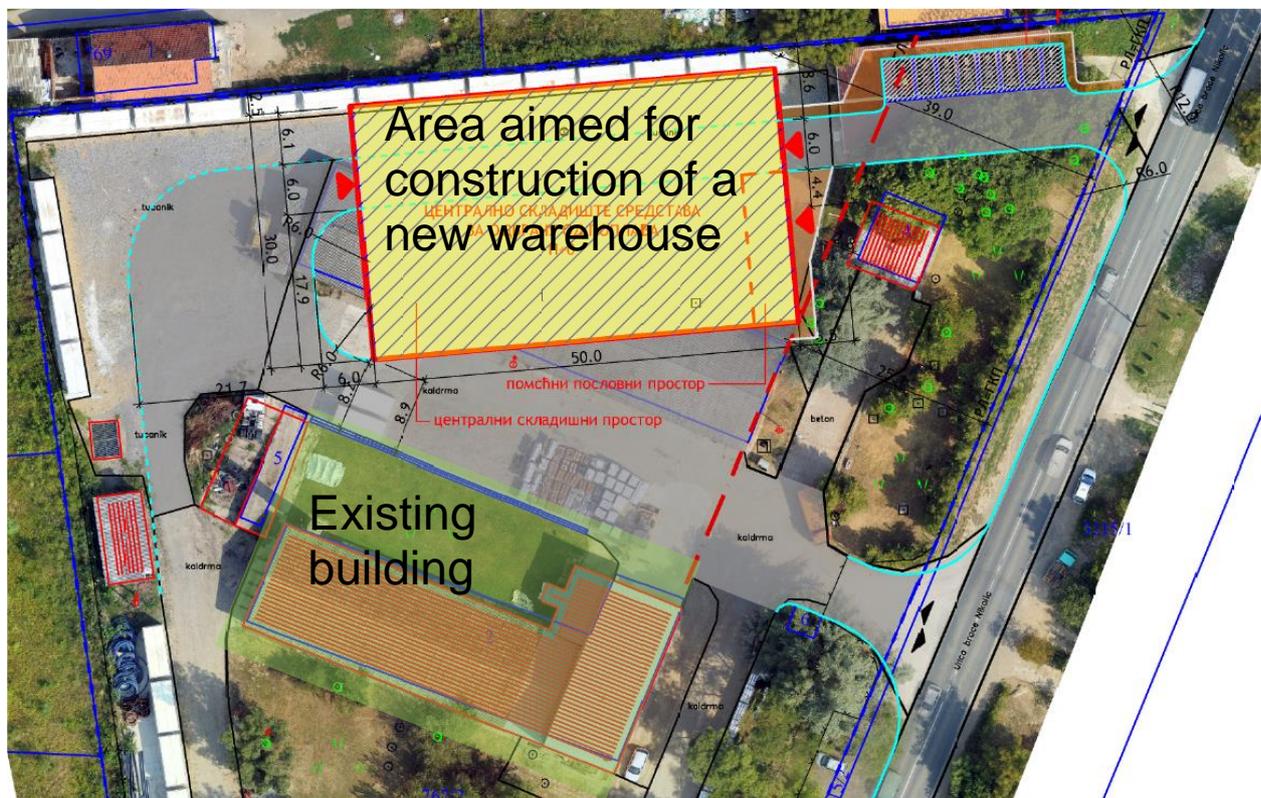
Republic of Serbia
Ministry of Agriculture, Forestry
and Water Management
Nemanjina 22-26, 11000 Belgrade

SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM (SDIP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

for

Construction of a warehouse for mobile equipment for
flood protection, plateau in front of the warehouse and
existing workshop, access road and drainage system, on
cadastral plot no. 767/2 in Surcin



BELGRADE, November 2019

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Abbreviations

DWM	Directorate for Water Management
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework Document
ESS	Environmental and Social Standards
ESSS	Environmental and Social Safeguard Specialist
SDIP	Sava and Drina River Corridors Integrated Development Program
GEMM	General Environmental Mitigation Measures
IFC	International Financial Corporation
MAFWM	Ministry of Agriculture, Forestry and Water Management
MCTI	Ministry of Construction, Transport and Infrastructure
MEP	Ministry of Environmental Protection
INP	Institute for Nature Protection
IPCM	Institute for Protection of Cultural Monuments
ISRBC	International Sava River Basin Commission
PMU	Project Management Unit
PPE	Personal Protective Equipment
PSC	Project Supervision Consultant
PWMC	Public Water Management Company
RDNEIA	Request for decision about the need for EIA
RoS	Republic of Serbia
SSIP	Site Specific Implementation Plan
WB	The World Bank Group

INTRODUCTION

A pivotal feature of the Western Balkans region is the Sava River Basin, one of Europe's largest transboundary basins. It covers over one third of the Western Balkans in area and population and connects five of the eight Western Balkan countries (Slovenia, Croatia, BiH, Serbia, and Montenegro). The Drina is the Sava's largest tributary, draining over 20,000 km² of mountainous area. The economy and jobs in the region depend heavily on these shared water resources, to transport goods, generate energy, grow food and fibers, sustain biodiversity, as well as provide for leisure and eco-tourism activities.

This document presents the Environmental and Social Management Plan (ESMP), which has been prepared to ensure that the proposed Sava and Drina River Corridors Integrated Development Program (SDIP) is implemented in accordance with the World Bank Environmental and Social Standards (ESS) and local legislation related to environmental protection and social safeguarding. The main purpose of this ESMP is to serve as a valuable tool for identifying possible key environmental and social impacts that will result from the project and proposing mitigation measures to address the most significant impacts. The ESMP also shows the responsibilities of different parties involved in the project implementation. Although the SDIP project has been classified as High risk according to the World Bank ESF, the proposed sub-project is classified as Substantial as the type of works envisaged by the technical documentation require extensive excavation, large quantities of material and dredging. However, there are no resettlement impacts, including no physical displacement. All mitigation measures, both environmental and social adequately respond to the identified impacts, leaving residual impacts at an almost negligible scale..

1. SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM - DESCRIPTION

1.1. Background

The Sava and Drina have a proclivity for both dry spells and devastating floods—most recently occurring in 2010 and 2014. The 2014 Sava flood—the largest flood in a century—caused 79 casualties and a damage of €1.5 billion in Serbia (4.7% of GDP), €2.0 billion in Bosnia and Herzegovina (15% of GDP) and €300 million in Croatia (0.5% of GDP) . In 2010 the Drina was flooded extensively—partly due to spilling hydropower reservoirs—and saw its highest levels in 100 years. Flash floods destroyed houses, bridges and sections of roads, while rising water levels resulted in flooding of both urban and rural areas.

The Sava Drina River Corridors Integrated Development Project (Phase 1 of the Program) main focus is to improve flood protection, and transboundary water resources management in selected catchment areas of the Sava and Drina river corridors, with the higher level objective being to enhance regional economic integration and growth through improved flood protection, waterway navigability and freight transport connectivity, and transboundary water management along the Sava and Drina Corridor.

This project will implement sub-projects with high implementation readiness and relevance to the program objectives, with detail designs and tender documents likely ready by Effectiveness in Montenegro, BiH (Brcko District), and Serbia, while simultaneously preparing subprojects that will be implemented during the second phase of the Regional Program. The project consists of three components as described below:

- Component 1: Integrated Development of the Sava River Corridor
- Component 2: Sustainable Management of Environmental Assets in Drina Corridor
- Component 3: Enabling regional economic integration, institutional strengthening and program management

1.2. Surcin Project Description

The construction of a warehouse for mobile equipment for flood protection in Surcin includes demolishing/dismantling of the two existing warehouses, construction of a new warehouse for storing mobile flood protection equipment, a plateau in front of the new warehouse and an existing workshop, an access road and a drainage system, on a cadastral plot number 767/2 cadastral municipality Surcin.

The construction of a prefabricated hall for storing mobile flood protection equipment is foreseen on parcel no. 767/2, with a surface of about 1500 m², including all of the accompanying objects, right next to



Picture 2. Project location, Surcin, warehouse zone



Picture 3. Project location, existing warehouses

1.3. Baseline conditions assessed during route survey

Preconditions from relevant institutions, including the Institute for Nature Protection of Serbia (INP) and Institute for Protection of Cultural Monuments, have not yet been obtained since the procedure for acquiring a Construction had not been initiated.

The proposed project area is in use, fully developed with access roads, plateaus for manipulation of machinery, offices and utilities. The location has a fuel station, an underground fuel tank, as well as an

underground septic tank. (Picture 4.) However, it is important to emphasize that existing fuel station and underground tank are not included in this project.



Picture 4. Existing fuel station

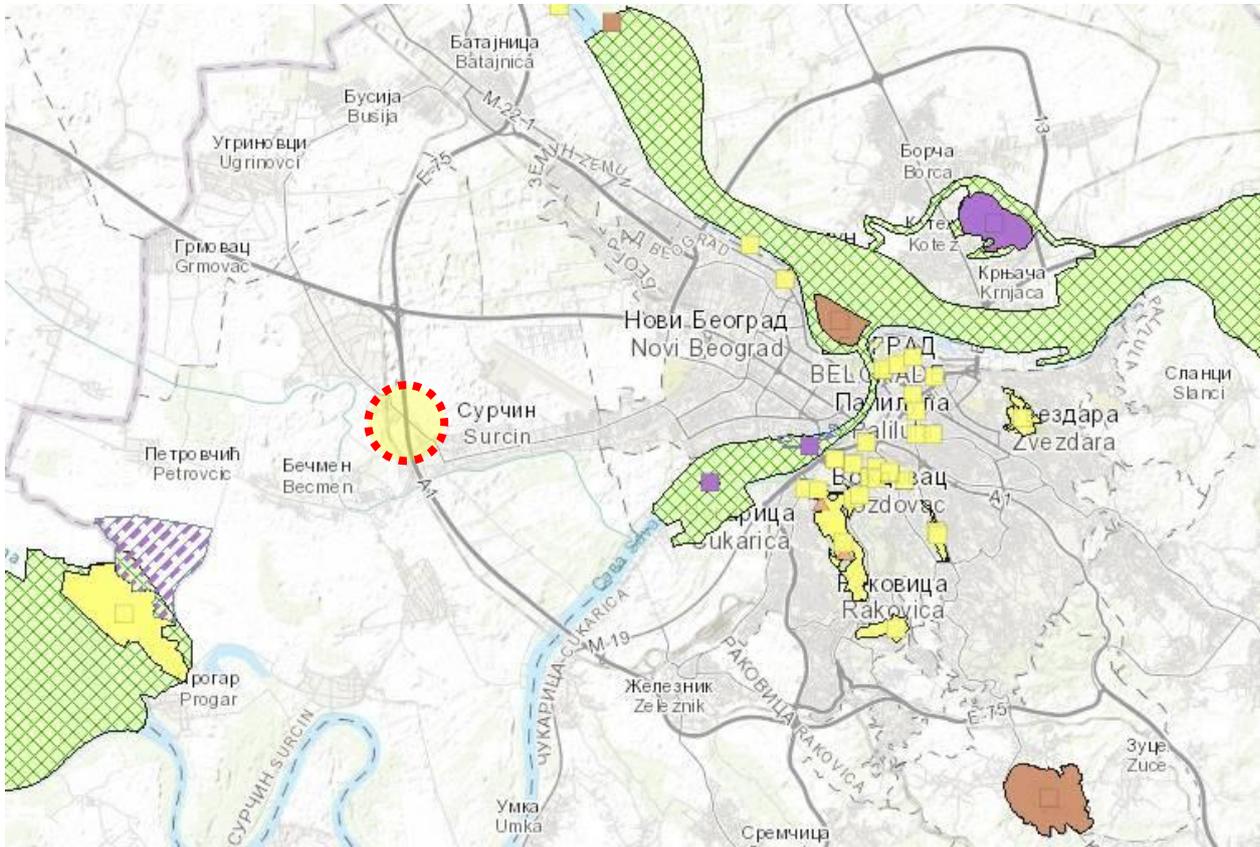
The site hosts a large number of storage containers used for storing of mobile flood protection equipment, which is planned to be stored in the new warehouse proposed for construction. (Picture 5.)



Picture 5. Existing warehouse proposed for demolition/dismantling, storage containers and residential building bordering the cadastral parcel

1.3.1. Nature Protected Zone

According to the map of protected areas, and official list of nature protected areas¹ prepared by Institute for Nature Protection of Serbia (INP), project area is not included in the ecological network, nor in the area of registered natural assets. Inside the wider area surrounding the project section there are many natural assets. Pictured below are protected natural monuments and areas, ecological corridors and natural area for whom the protection procedure has been initiated, and due to extreme distance from the project zone, with all of them being completely spared from any negative project impact.



Picture 6. Project zone in regards to Ecological corridors (green hatch) protected areas (yellow, orange, purple and brown fill) protected monuments (yellow squares) and areas for whom the protection procedure has been initiated (purple hatch)

Protection of cultural monuments

Upon inspecting the publicly available database of cultural assets², the following cultural monuments were identified inside Surcin municipality:

- Church of St. Petka;
- Church of St. Paraskeva;
- Church of St. Jovan Preteca;
- National Aeronautical Museum.

With the nearest asset to the project zone being the Church of St. Petka located approximately 1.5 km away. In regards to the limited works and footprint of the proposed construction works no identified cultural assets will be impacted.

1.3.2. Land acquisition and Property – Legal affairs

¹ http://www.zps.rs/novo/index.php?jezik=en&strana=zastita_prirode_zasticena_prirodna_dobra

² http://heritage.gov.rs/english/nepokretna_kulturna_dobra.php

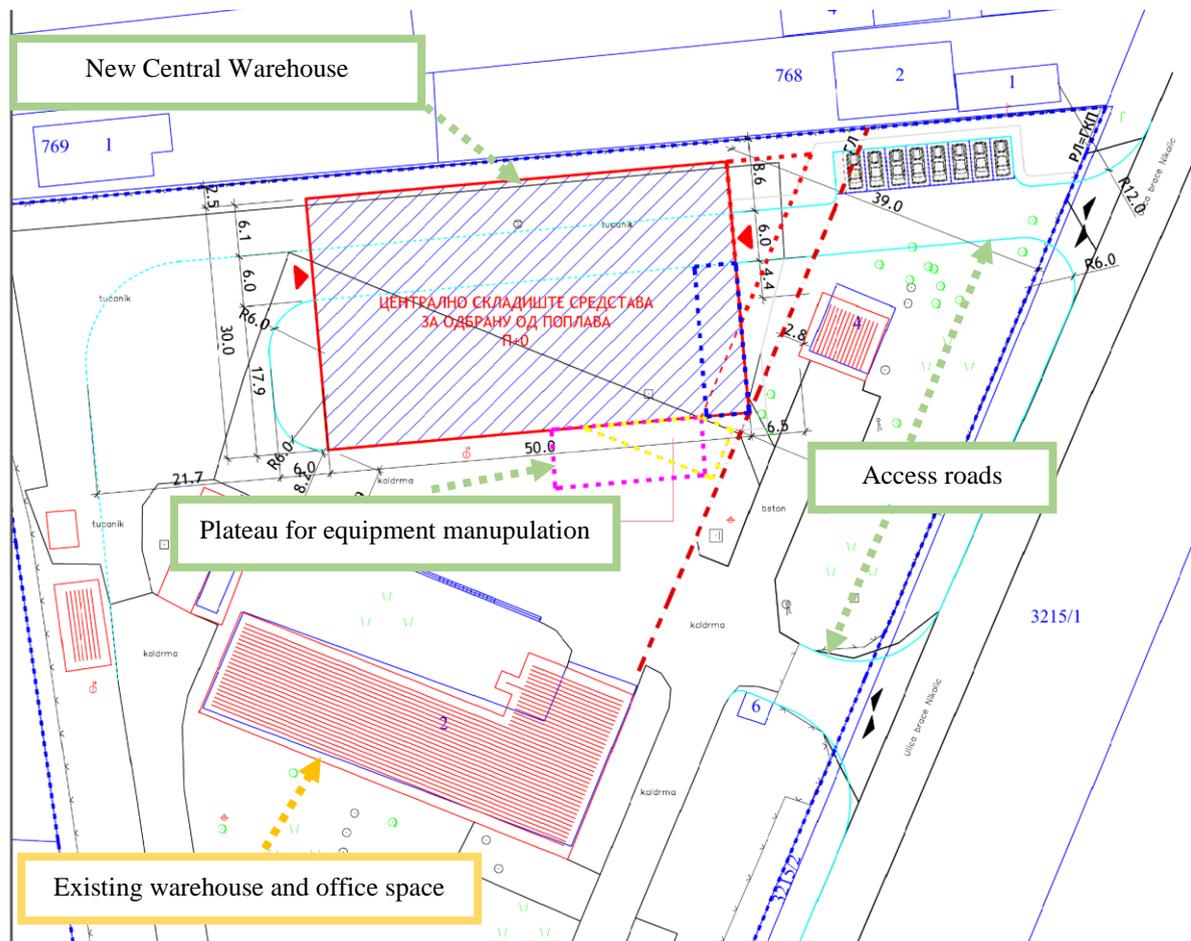
The warehouse to be upgraded is part of a larger complex for decades (since 1967) used and owned by the PWC “Galovica” a water management company owned entirely by the State. The land was subject to expropriation and evidence of lawful acquisition and payment of compensation was presented in the course of the social Due diligence. The total area of land of the entire complex is approximately 1500 m². The development of the Warehouse will not require acquisition of unoccupied or unutilized land (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. “Land” includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

The social due diligence conducted concluded that the land of the intended warehouse is public land owned by the Republic of Serbia. The construction will be constrained to the footprint of the existing warehouse therefore confined to public land. However prior to actual development activities the social due diligence shall be verified by a walkover survey, and cadastral verification as these are currently unavailable due to an ongoing administrative procedure. It is not expected that the outcome of the follow up due diligence will differ from these findings but are proposed as best practice implementation case.

In term of relevance of the ESS5 it is assessed that these are not relevant.

1.4. An overview of the Construction work on Surcin sub-project

A new warehouse for mobile flood protection equipment in Surcin will be built close to the old office building and warehouse. Gross dimension of the new warehouse are dependent on the adopted structural solution and will be either 39.64 * 5.60 m or 37.50 * 5.60 m, with a gross area, including the manipulative plateau, parking spaces and access roads, of cca 1500 m². All of the facilities will be built on the existing cadastral parcel 767/2, cadastral municipality Surcin. (Picture 4.)



Picture 7. Conceptual architectural solution

Crucial project activities are:

- Demolition (dismantling) and removal of the existing warehouses; (Picture 5.)
- Construction of a new warehouse. Gross area of about 220 m²;
- Plateau in front of the warehouse for manipulation of equipment;
- Access road and a plateau next to it with 8 parking spaces;
- Drainage system;
- Electrical instalations.



Picture 8. Existing warehouse which needs to be demolished (dismantled) and the residential building closest to the construction zone



Picture 9. Existing warehouse which needs to be demolished (dismantled)

2. LEGAL AND INSTITUTIONAL FRAMEWORK

2.1. Relevant Institutions

In the Republic of Serbia SDIP will be implemented through two PMU's which are formed in the Ministry of Agriculture, Forestry and Water Management (MAFWM) and the Ministry of Transport, Construction and Infrastructure (MCTI).

The MAFWM and the Ministry of Environmental Protection (MEP) are the key relevant institutions for environmental management for SDIP related projects.

The other aspects of environmental management related to SDIP projects are dealt with several other institutions, among which are the Institute for Nature Protection of Serbia and the Institute for Protection of Cultural Monuments of the Republic of Serbia, and the Public Water Management Companies (PWMC) "Srbijavode", "Beograd Vode" and "Vode Vojvodine".

2.2. EIA procedure in the Republic of Serbia

In the juridical system of the Republic of Serbia, the Environmental Impact Assessment procedure is regulated by the Law on Environmental Impact Assessment, which is completely in line with European EIA Directive (85/337/EEC, 97/11/EC, 2003/35/EC and COM 2009/378). According to that Law, preparation of the Environmental Impact Assessment is not required for the flood protection projects unless their alignments are placed within or in the vicinity of the nature or culture protected areas. In such cases the Project Proponent is obliged to submit so-called "Request for Decision about Need for Environmental Impact Assessment" (RDNEIA) to the Ministry of Environmental Protection (MEP). Depending on the Ministry's assessment of significance of potential environmental impacts of the project, it is decided if there is a need (or not) to apply partial or full EIA procedure for the relevant sub-project.

Request for opinion regarding necessity of EIA procedure for each sub-project which is found to be adjacent or within the nature/cultural protected area will be submitted to the Department of Environmental Impact Assessment within the Relevant Institution.

2.3. Relevant Government Policies, Acts, Rules, Strategies and Guidelines

Environmental protection in Republic of Serbia is regulated by several national and municipal laws and by-laws. The environmental legislation in force in Serbia is summarized in Annex 1.

The main legal documents are:

- The Constitution of Serbia ("Official Gazette of RoS" No. 98/06).
- The National Strategy for Sustainable Development ("Official Gazette of RoS" No. 72/09, 81/09)
- Law on Environmental Protection ("Official Gazette of RoS" No. 135/04, 36/09, 72/09, 43/11, 14/16)
- Law on Environmental Impact Assessment ("Official Gazette of RoS" No. 135/04)
- The Law on Waste Management ("Official Gazette of RoS" No. 36/09, 88/10, 14/16)
- The Law on Water ("Official Gazette of RoS" No. 30/10, 93/12, 101/16)
- The Law on Occupational Safety and Health ("Official Gazette of RoS" No. 101/05, 91/15)
- Law on Planning and Construction ("Official Gazette of RoS" No. 72/09, 81/09, 64/10, 24/11, 121/12, 42/13, 50/13, 98/13, 132/14, 145/14)
- Law on Nature Protection, ("Official Gazette of RoS" No. 36/09, 88/10, 91/10, 14/16)
- Agricultural Land Law, ("Official Gazette of RoS" No. 62/06, 41/09, 112/15)

Regulations established on the basis of the Law on EIA include the following:

- Regulation on establishing the List of Projects for which the Impact Assessment is mandatory and the List of projects for which the EIA can be requested ("Official Gazette of RoS" No. 114/08)
- Rulebook on the contents of requests for the necessity of Impact Assessment and on the contents of requests for specification of scope and contents of the EIA Study ("Official Gazette of RoS" No. 69/05)

Regulation on Labour, Working Conditions and Gender equality

- Labor Law ("Official Gazette of RoS" No. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017, 113/2017 and 95/2018)
- Law on Civil Servants ("Official Gazette of RoS" No. 79/2005, 81/2005, 83/2005, 64/2007, 67/2007, 116/2008, 104/2009, 99/2014, 94/2017 and 95/2018)
- The Law on Peaceful Settlement of Labor Disputes ("Official Gazette of RoS" No. 125/2004, 104/2009 and 50/2018)
- Law on Employment and Unemployment Insurance ("Official Gazette of RoS" No. 36/2009, 88/2010, 38/2015, 113/2017 and 113/2017)
- Law on Employment of Foreign Citizens ("Official Gazette of RoS" No. 128/2014, 113/2017, 50/2018 and 31/2019)
- Law on Retirement and Disability Insurance ("Official Gazette of RoS" No. 34/2003, 64/2004, 84/2004, 85/2005, 101/2005, 63/2006, 5/2009, 107/2009, 101/2010, 93/2012, 62/2013, 108/2013, 75/2014, 142/2014, 73/2018 i 46/2019)
- Law on Health Insurance ("Official Gazette of RoS" No. 25/2019)
- Law on the Prohibition of Discrimination ("Official Gazette of RoS" No. 22/2009)
- Law on the Prevention of Harassment at the Workplace ("Official Gazette of RoS" No. 36/2010)
- Rulebook on Conduct of Employers and Employees in Relation to Prevention and Protection from Harassment at Work ("Official Gazette of RoS" No. 62/2010)
- Law on Protection of Whistle Blowers ("Official Gazette of RoS" No. 128/2014)
- Law on Gender Equality ("Official Gazette of RoS" No. 104/2009)

2.4. Applicable Environmental and Social Standards

Environmental and Social Standards relevant for Surcin Project are:

	E & S Standards	Relevance
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS2	Labor and Working Conditions	Relevant
ESS3	Resource Efficiency and Pollution Prevention and Management	Relevant
ESS4	Community Health and Safety	Relevant
ESS5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Relevant
ESS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Relevant
ESS7	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Relevant
ESS8	Cultural Heritage	Not Relevant
ESS9	Financial Intermediaries	Not Relevant
ESS10	Stakeholder Engagement and Information Disclosure	Relevant
OP 7.50	Projects on International Waterways	Not Relevant ³

3. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

During the implementation of the subproject, impacts on environment will be a consequence of human presence and construction machines, and the nature of construction works at a location, which are limited to the location of works or its surrounding vicinity. The expected impacts are limited to the construction period, and can be easily mitigated through the application of relevant mitigation measures, as set forth in this ESMP.

The construction of a new warehouse in Surcin would not pose significant risks to the environment. In addition, the project aim is only to improve the efficiency of flood control systems. As a consequence, the range of impacts is limited (impacts directly related to the construction activities) and their magnitude remains small (localized impacts and no significant effect on future operation). Considering the nature of the proposed project, it is anticipated that adverse environmental and social impacts can be expected in the construction phase mainly. The aspect of health and safety at work is also taken into consideration. It is to be noted that parts of the construction work are taking place in an urban environment, however in all parts in an environment already strongly influenced by human activities. Broadly, the impacts in the construction phase can be of the following types:

- **Soil and Water Pollution:** during construction activities, when using machinery, there is a possibility of soil contamination due to accidental spills of oils and fuel from construction machinery. In the area of construction works, construction waste is generated which, if not properly disposed of, may result in adverse impacts. The construction works carried out inside the river bed results in a temporary increase of turbidity of the watercourse.
- **Disposal of excavated materials and construction wastes.** Demolition debris and waste are usually generated and are anticipated mostly during the demolition / dismantling works with minor impacts anticipated during the construction phase;
- **Degradation of landscapes and soil erosion.** The impacts on vegetative cover will be short-term, localized, and totally associated with demolition / dismantling and construction works;
- **Impacts from temporary access roads and work areas.** Temporary disposal sites for excavated materials can enhance soil erosion, and degrade the landscape, as well as excess dirt and mud being spread from the machinery leaving construction site;

³ Relevant for the overall SDIP project implementation, not relevant for proposed sub-project

- **Noise and vibration disturbances** during construction and temporary air pollution (dust) related to the transportation of construction materials and truck traffic. These impacts will occur during the demolition / dismantling and construction / reconstruction works, but will be only short-term. Effects include dust from construction activities, noise during trench excavation, possible effect of vibration caused by operation of heavy machinery, increased traffic in some sections of roads, etc.;
- **Safety hazards from construction activities.** No major hazards are expected the construction of the proposed project elements, as long as proper construction practices and safety procedures are applied;
- **Impacts on historic-cultural and archaeological monuments.** No archaeological or cultural resources are expected to be encountered during project implementation since major works consist in construction of new warehouse in place of the two existing ones, and in case of any findings the Contractor shall cease with works momentarily and notify the relevant IPCM.
- **Key Labor Risks.** Contractor's employees will perform everyday construction activities, any OHS impacts will be mitigated by applying the procedures put forth in this ESMP document and relevant national legislation and the World Bank EHS Guidelines. All Employers of direct or contracted workers, in the project must ensure safety and health at work and strict adherence to the legal provisions in respect to worker's rights.

3.1. Potential environmental impacts of Surcin Project

In general, all negative impacts in the phase of construction are temporary and can be mitigated by applying good construction practices.

Significant negative impacts on natural environment in the operational phase are not expected. On the contrary, impacts in the operational phase are considered to be highly positive, as project aims at prevention of risks for environment, humans and civil infrastructure.

Project impacts by phases are shown in following table:

Phase	Type of impact
Construction phase	Soil compaction and erosion Dust emission Noise Soil and water pollution Damages to and removal of trees surrounding the old metal warehouse Risk to people and/or animals of unfenced and unlabelled construction site Health hazards and environmental impacts due to the generation of construction waste Pollution due to possible hazardous materials arising from the demolition of the old warehouse Health and safety risk for workers on the construction site
Operational phase	Low impact on natural environment on the project location Positive impact in terms of prevention of risks for environment, humans and property
Degree of negative impact	Minimum if mitigation measures are applied

3.2. Potential social impacts of the Surcin Project

Construction of the new warehouse will be carried on existing place and same cadastral parcel (plot no. 767/2 cadastral municipality Surcin). The project neither requires land acquisition or involuntary resettlement, clearance of occupied public land, nor leads to loss of assets, access to assets or loss of livelihood or access to means of livelihood as defined by ESS 5, nor long lasting disruptions to the natural environment and human settlements and activities.

3.2.1. Community information and grievance mechanism

The PMU will disclose sub-project information to allow the affected community and other stakeholders to understand the risks and impacts of the Sub-project, and potential opportunities. In course of the stakeholder engagement activities the community will be engaged in meaningful consultation with access to the following information:

- The purpose, nature and scale of the project prior to commencement of the activities;
- The duration of proposed project activities;
- Potential risks and impacts of the Sub-project on local community;
- The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
- The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
- The process and means by which grievances can be raised and will be addressed.

An official and formal LGD and CFD will be established as a forum for grievances and comments in relation to expropriation, temporary impact to any kind of property, damages in relation to execution of the works. The information about the GM will be publicly disclosed and available on the notice board of the Construction site and the Municipality of Surcin.

Prior to commencing construction, the implementing agency should:

- Distribute a one-page information brochure to directly affected people with the following information: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities and working hours; (iii) any risks (in case of trespassing) to and potential impacts on such people and relevant mitigation measures; and (iv) contact information to receive further information of submit concerns or complaints.
- At the work site there should be a visible sign with the name of the project, planned duration and contact information.

Below is a brief description of the procedure and responsibilities for receiving, processing and responding to communication and complaints from the public regarding this sub-project:

- Communications and complaints can be received directly by the contractor at the work site or by the Municipality through the contact information it provides to the public. It must be noted that the Municipality is the responsible for responding to any communication.
- Such communications are noted in a “communications log” to be maintained by the Municipality and the person sending the communication (verbally or on writing) receives an acknowledgement of receipt of his/her communication.
- The communication should be processed and responded two in no more than 15 days.
- The response to the communication, and any corrective action required as a result of it, must also be registered in the “communication log”.

An example of a project grievance mechanism is given in Annex 2.

3.2.2. Capacity Strengthening and Training

Through SDIP project implementation relevant national agencies will familiarize themselves with WB Environmental and Social Standards through consultations and public presentations, as well as with good practices in their purposeful implementation.

Engaged Contractors will be obliged to familiarize their workers and staff engaged on Sub-Projects implementation with the Environmental and Social Standards, increasing general awareness and knowledge.

3.3. Other positive impacts of SDIP Project

The sub-project is expected to create a short-term project depended employment opportunities.

In case of unemployment and poverty in the project area, manpower resources will not be reduced. If some of the unemployed are employed or if employment has impact on unemployment, the project creates social benefits due to decreased social support or aid to the unemployed.

3.4. Potential negative Impacts and recommended Mitigation Measures

Summary of key impacts during construction phase and recommended mitigation measures are described in following table:

Table 1: key impacts during construction phase and recommended mitigation measures

impact	significance	comment
impacts on land use/settlements,	low	There will be no land acquisition as defined by WB ESS 5 during the project implementation. This shall be confirmed by a follow up social due diligence including a walkover survey prior to commencement of sub-projects activities.
ground and surface water,	low	Due to low amount of drainage water that can be potentially drained into any river the consequential impact is expected to be minimal to negligible. Also, improper disposal of excavated materials and construction wastes could adversely impact ground and surface water
air quality,	low	Outdoor air pollution by dusts during preparation of working materials and other working procedures and material transport. Indoor air pollution by dust, noises etc. Temporary impact. Local air quality may experience some moderate and temporary deterioration due to dust from transportation of construction materials and truck traffic and elevated levels of nitrogen oxide (Nox) and sulphur oxide (Sox) from construction equipment exhausts. Impact can be mitigated by following GEMM procedures
flora and fauna (protected areas and species),	low	Minimal loss or damage of vegetation and loss and damage or disruption to fauna can occur during works. Removal and/or damages to trees surrounding the metal warehouse. Impacts can be offset or mitigated by following GEMM procedures. In case of removal of trees replanting is necessary. There will be no negative impacts on protected areas due to nature of works.
Noise and vibration,	low	Outdoor noises by electric generators, preparation of construction materials, material transport etc. Only limited temporary impact during the construction phase. Mitigation measures in form of noise deflecting shields will be placed where the work-scheduling activities cannot have desired effect. Impact can be mitigated by following GEMM procedures.
Soil quality,	low	Soil contamination can occur from: Spillage of hazardous and toxic chemicals. Contamination by inappropriate paints, lubricants etc. Impact can be mitigated by following GEMM procedures
Loss of top soil	low/negligible	Site is fully developed impact is negligible
existing infrastructure	low	Increased traffic due to construction activities, as well as destruction of existing road infrastructure. Impact can be partially mitigated by using main traffic routes.
Waste,	low	Health hazards and environmental impacts can happen due to improper waste management practices. Demolition waste and other waste management impacts can be mitigated by following GEMM procedures, Law on Waste management

impact	significance	comment
		and the Local Waste Management Plan for the city of Belgrade ⁴ .
cultural and religious issues,	low/negligible	No identified cultural assets in the vicinity of the project area, works will be executed in place of existing buildings.
Cumulative impacts etc.	negligible	There are no cumulative impacts of the works
Staff safety	low	Construction workers may be affected adversely due to hazardous working environments where high noise, dust, unsafe movement of machinery etc. may be present.
Community Health and Safety	moderate	Risk to community health and safety (ESS4). The major risks tied to Community health and Safety relate to potential traffic and road safety risks to workers, affected communities and road users throughout the project life. These risks mainly stem from increased traffic on haulage routes from and to potential borrow and deposit areas to be used by the Contractors during construction works. Increased risk from hazardous materials including UXOs, mines and mine-exploding devices might be found which shall adequately be addressed through development of "Unexploded ordnance and mines chance finds procedure". Health and safety risks posed by the influx of workers or people providing support services into an area are almost considered negligent, while Gender-Based Violence (GBV) or Sexual Exploitation and Abuse (SEA) of children, or communicable diseases are not anticipated in relation to the project.

Table 2: Identification of main risks

Activity	Possible Risks
Demolition/construction works	Risk for contamination of the territory elements that can be dispersed at groundwater sources. Risk on workers life if not respecting technical safety conditions. Risk by accidents caused by electrical power and humidity. Risk of improper waste management and possible impact from hazardous materials during the demolition phase. Risk on workers' health in case of air pollution or other contamination by waste waters and materials to be used on contraction/rehabilitation
Transport	Risk of life of inhabitants, pedestrians and workers in the road from construction site
Infrastructure	Road consumption and destruction of road pavement by passing of big transport vehicles.

Table 4: Identification of possible impacts and risks during operation phase

⁴ <http://www.sepa.gov.rs/download/UpravOtpad/BeogradLPUO.pdf>

Activity	Possible impacts/risks
Using of inappropriate materials/chemicals for maintenance	Possible contamination of the territory

Possible adverse effects as a consequence of temporary construction activities shall, among other things, consist of: damages to access roads, noise, waste and dust; gaseous emissions; potential soil and water contamination; short-term disruptions to surrounding ecosystems; and momentary disruptions to neighbouring settlements through various project and operational activities.

Increasing the intensity of the road transport during the construction works, may increase the risk of accidents for pedestrians.

Of activities not present directly at the construction site, the following stand out: quarry and borrow pit operations which if not managed properly, may lead to temporary adverse impacts.

3.5. Potential water / wetland contamination

Considering possible pollutions after works completion, they are limited to accidents only. In which case as defined by the Ministry of Interior and the Law on Water, procedures for incidental situations will be applied.

Spillage of fuels and oils may, in most cases, occur on manipulative surfaces where equipment and construction mechanization are maintained and cleaned. Effluent dirty water should be treated in separators of adequate size before being discharged towards the recipient.

If any spillage occurs inside the project area, the Contractor is obligated to react by applying absorbing materials, such as absorbing carpets / linens, and/or sand, as well as remove the layer of contaminated soil and move it to an approved location, in accordance with the Law.

4. ENVIRONMENTAL MITIGATION MEASURES

This document presents a site-specific ESMP, prepared by the ESSS and is required for each SDIP sub-project. A site-specific ESMP is an action plan detailing which of the Environmental Assessment report recommendations and alternatives are adopted and implemented. It can be produced as part of Detailed Design, or like the subject ESMP, as a free-standing document. It ensures incorporation of the relevant environmental factors, key impacts and their proposed mitigation measures into the overall project design and links the project to other relevant Environmental and Social Standards.

4.1. Cost Estimates

Scope of prescribed mitigation measures for the subject project works is such that it correlates with good environmental practises during construction and their implementation will have a negligible impact on the total cost of the works.

It is the Contractor's obligation to cost implementation of environmental mitigation measures in his overall cost. The Contractor will be required to provide a short statement that confirms that:

- the ESMP conditions have been costed into the tender price,
- the Contractor has a qualified and experienced person on the Contractor's team who will be responsible for the environmental compliance requirements of the ESMP
- the Contractor and its sub-contractors will comply with Republic of Serbia national laws and Lender requirements.

4.2. Mitigation Measures

4.2.1. General

This section details out the potential environmental and social impacts of the SDIP sub-projects including Surcin project.

4.2.2. Environmental and Social Impacts and Respective Mitigation Measures

Potential air pollution - Dust

Impact - Possible sources of air pollution will be dust due to maintenance activities, machinery movement and other sources. Construction works involve breaking up, digging, crushing, transporting, and disposal of small quantities of dry materials. Locally, the air quality may experience some moderate and temporary deterioration due to dust from construction traffic and elevated levels of nitrogen oxide (NOx) and sulphur oxide (SOx) from construction equipment exhausts. The dust may settle on vegetation, crops, structures and buildings.

Mitigation Measures - Spraying of water is the main way of controlling dust. Water is, in any case, required to be added to fill material during the repair / reconstruction works.

Potential water contamination

Impact - Water contamination may occur during the execution of the project from site run off, spills from the equipment maintenance areas from the work site. As for the potential pollution during operation, these are mostly limited to accidents. In such a case, procedures for action in incidental situations, as defined by the Ministry of Interior and in the Water Law, will apply.

Mitigation Measures - Fuel and lubricant spills can occur at the work site while maintaining and washing equipment and work vehicles. During the normal operations, these areas should be equipped with the adequately sized, gravity oil separator. Should spills occur, to mitigate the problem the Contractor should use absorbing materials, such as absorbent mats/fabrics, or sand and scrape off the contaminated soils and dispose them in approved facility, in accordance with the Water Law.

Contractor should produce a Waste Management Plan for the Project. Mitigation measures should, among other requirement, contain contractor obligations to:

- Locate the garbage pit/waste disposal site min 500 m away from the residential area so that people from Surcin are not disturbed with the odour likely to be produced from anaerobic decomposition of wastes at the waste disposal places. Encompass the waste disposal place by fencing and tree plantation to prevent children to enter the area. All solid waste will be collected and removed from the work camps and disposed in approval waste disposal sites.
- In case oil and grease are trapped for reuse in a minimum 60cm thick lined pit, care shall be taken to ensure that the pit should be located at the lowest end of the site and away from the residential areas.
- In case of filling of low-lying areas with wastes, it needs to be ensured that the level matches with the surrounding areas. In this case care should be taken that these low lying areas are not used for rainwater storage.
- Ensure that all construction waste from demolition/dismantling of existing warehouses, as well as municipal waste generated throughout the project cycle is handed over to the responsible authority for waste collection.

Equipment maintenance and fuelling

Impact - equipment maintenance and fuelling may cause contamination of soils and watercourses, including groundwater, if handling of lubricants, fuels and solvents is improper or careless.

Mitigation Measures - To avoid damage to natural environment there is a need to ensure proper handling of lubricants, fuels and solvents while maintaining the equipment.

Occupational Health and Safety

Impacts - Construction workers may be affected adversely due to hazardous working environments where high noise, dust, unsafe movement of machinery etc. may be present.

Mitigation Measures - The Contractor shall instruct his workers in health and safety matters, and require from the workers to use the provided personal safety equipment. Contractor has to ensure that all operators of heavy or dangerous machinery are properly trained/certified, and also insured. He will have to provide first aid facilities, rapid availability of trained paramedical personnel, and emergency transport to nearest hospital with accident and emergency facilities.

Noise

Impact - Noise caused by the repair / reconstruction works will have only a temporary impact. Although temporary and mostly moderate, noise impacts in the vicinity of residential areas may cause negative health impact, if not mitigated.

Mitigation Measures - In sensitive areas (schools, nature parks, hospitals) special care regarding noise emission will be taken by the Contractor, strictly respecting the ESMP requirements. In case of noise disturbance with noise emissions which are above permitted level, temporary noise barriers should be considered as appropriate mitigation measure. Awareness building and administrative measures should be taken to ensure proper maintenance of vehicles. In case of exceeded noise limits for sensitive areas the Contractor should erect temporary shields to prevent a free noise spreading to the sensitive receptors.

Based on the preliminary assessment, key mitigation measures recommended under this Environmental and Social Management Plan (ESMP) are listed as follows:

- Identify and locate on project plans any sensitive natural resources in the project area including but not limited to patches of natural habitat, bird colonies, and wetlands, unique plant communities etc. (consult with local nature protection authorities).
- Provide for zones of preliminary accumulation of wastes that will cause no damage to the vegetation cover and other components of the environment.
- Transport and disposal of construction concrete rubbles, debris and spoils in approved paths and landfills/disposal sites.
- Delineate existing access roads/ work areas carefully and prevent their expansion.
- Rehabilitate access roads and work areas after work completion (scratch soil with special engine, put fertile topsoil in place, etc.).
- Use closed/covered trucks for transportation of construction materials.
- Clean the surrounding area from dust by water sprinkling, removal of excess materials and cleaning of sites upon completion of activities.
- Restoration to quasi-original conditions of landscape after completion of construction and repair / reconstruction works.
- Arrange necessary preservation measures (establish protection zones, by-pass these areas during transportation and other).
- Cease the works as soon as historical and cultural monuments are encountered during earthworks and provide relevant information to the competent Institution for Historical and Cultural Monuments Protection.

Labor risk

Impacts - Workers may be exposed to usual construction site hazards associated with these moderate risk construction works but may be exposed to working at heights, scaffolding, operating of and around equipment and machinery

Mitigation Measures – The Contractor shall deploy a commensurate Health and Safety Plan to be approved by the Engineer covering the workplace risks.

Impacts – Workers may have workplace disputes and concerns,

Mitigation measure> Establishment of a worker specific grievance mechanism for project workers. The project worker is entitled to give suggestions, remarks and information regarding health and safety at work. He/She may refuse to work if his/her life or safety is endangered or if appropriate measures for provision of health and safety at work are not in place. The project workers should be informed on available grievance mechanisms upon their employment or engagement. Contracted parties should demonstrate their willingness to implement these mechanisms, even if such requirement is not prescribed by any law of the domicile country.

Prior to initiating works, the Contractors will be required to prepare and submit for approval Site-Specific Implementation Plans (SSIP) consisting of:

- Waste and wastewater management plan
- Site Organization Plan
- Re-forestation plan
- Emergency response plan

The following table presents the Mitigation Plan for SDIP Sub-project Surcin and it is intended as a checklist to ensure that relevant mitigation measures are implemented at appropriate project stages.

Contractors are obligated to familiarize their workers with the Environmental and Social protection measures put forth within the subject ESMP document.

4.3. Mitigation Plan for SDIP Sub-Project SURCIN

Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
PRE-CONSTRUCTION	EIA Procedure and Tender documents preparation			
	Tender documents prepared with access to or use of the this ESMP in a translated version	No tender documents will be prepared without incorporated a (Serbian) copy of the mitigation and monitoring plan ESMP, which shall be included in the safeguard clauses of the Technical Specifications in the contracts and commitment to comply with Lender Requirements	PMU on behalf of the Investor PWMC "Srbijavode"	
Planning/ Designing	Increased possibility of employment and gaining income in the local community.	Prioritise qualified local population in employment.	Contractor	Problems should be regulated through tender documentation.
Planning/ Designing	Assure compliance with relevant construction field legislation	Acquire construction permit Provide Water management guidelines if subprojects are executed near surface watercourses.	Project applicant	
Planning/ Designing	Assure compliance with relevant construction field legislation	Acquire construction permit Provide Water management guidelines if subprojects are executed near surface watercourses.	Project applicant	
CONSTRUCTION	Material supply			
	Quarry, concrete and asphalt plant .	use existing quarries, concrete and asphalt plants, use licensed suppliers for other materials; requirement for official approval or valid operating license	Quarry, concrete and asphalt plant, material supplier	to be specified in tender documents -Conditions for selection of subcontractors for material supply
CONSTRUCTION	Material transport			

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
	Dust, fumes	All trucks are to be covered	Truck operator	a)-d) to be specified in tender documents- Technical Specifications for realization of works
	Stone, Dust	wet or cover truck load	Truck operator	
	Sand and gravel, Dust	wet or cover truck load	Truck operator	
	Dust emissions from the site may impact air quality and pose a health threat to workers and neighbours	<p>In case of disposal of dredged or excavated materials the debris shall be kept in controlled area and sprayed with water mist to reduce debris dust</p> <p>During pneumatic drilling/compaction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site</p> <p>The septic tank (in case of reconstruction of existing ones) installed at toilet should be enclosed in quite hermetic manner to avoid unpleasant smells.</p> <p>The surrounding environment (side walks, roads) shall be kept free of debris to minimize dust</p> <p>There will be no open burning of construction / waste material at the site</p> <p>There will be no excessive idling of construction vehicles at sites</p> <p>All materials will be supplied/transported in a manner which minimizes dust – including covered truck loads or closed off truck loads, with dust suppressing measures through water spraying</p> <p>Wheels of transport vehicles will be washed prior to leaving the construction site</p>	Construction Contractor	
Rehabilitation/ Reconstruction/ Repair	Population at increased risks of traffic accidents and construction works to population.	<p>Assure adequate warning signs, lighting, protective fencing etc.</p> <p>Observe traffic rules.</p> <p>Clean construction waste form the construction site both in the construction phase and after works completion,</p>	Contractor	Problems should be regulated through the Works execution contract.

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
		when closing the construction site. Assure medical supplies and aid through institutional and administrative arrangements with municipal hospitals at the construction site. Implement the Construction Site Organisation Plan.		
CONSTRUCTION	Construction site			
	Excavation works may uncover archaeological or other significant findings	Stop all works on site in case of chance finding and notify proper authorities.	Construction Contractor	Project implementation delay
	Potential water and soil pollution from improper material storage, management and usage	organize and cover material storage areas; isolate concrete, works from watercourse by using sealed formwork or covers; isolate wash down areas of concrete trucks and other equipment from watercourse by selecting areas for washing that are not free draining directly into watercourse	Construction Contractor	
	Water and soil pollution from improper disposal of waste materials	dispose waste material at location protected from washing out, should be marked in the site plan; if not on site, then at authorized landfill / depot	Construction Contractor	
	Water and soil pollution from improper disposal of waste materials	Storage of wastes according to international best practice (IFC EHS General Guideline). Apply additional measures for storage of hazardous wastes (such as use of secondary containment, access restriction, provision of PPE etc.) as necessary to prevent harm to construction staff, environment and public. Use and labelling of designated waste collection containers and storage areas for different kinds of wastes.	Construction Contractor	
	Improper waste management may cause	Designated waste disposal areas will be allocated on site, including waste collection bins for smaller waste,	Construction Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
	pollution of soil and groundwater or cause scattering by wind/animals and pose a health risk	<p>and designated areas for bulkier waste</p> <p>All waste, including construction debris and excavated materials will be regularly and timely transported off site and managed through an authorized agency or disposed of at a site that was officially designated by the local authorities – Surcin Municipality</p> <p>Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.</p> <p>Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</p> <p>The records of waste disposal will be maintained as proof for proper management as designed.</p> <p>Whenever feasible the contractor will reuse and recycle appropriate and viable materials</p> <p>Removed vegetation may best be composted on site, at a designated and managed area.</p> <p>All oily wastes will be separately collected, in bins which are leak- proof, and will be handled over to the authorized management and Disposal Company, receipts for which shall be kept.</p>		
	Water and soil pollution from improper disposal of waste materials	Transport of waste in marked vehicles designed to the type of waste to minimise the risk of release of materials (hazardous and non-hazardous materials) and windblown debris. Training of drivers in handling and disposal of their cargo and the documentation of the transport describing the nature of the waste and its degree of hazard.	Construction Contractor	
	Potential contamination of soil and water from improper maintenance	apply best engineering practice in safe storage and handling of lubricants, fuel and solvents by secured storage; ensure proper loading of fuel and maintenance	Construction Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
	and fuelling of equipment	of equipment; collect all waste and dispose to permitted waste recovery facility		
	Improper material storage and use may cause pollution of air, soil or water	Store all materials in original containers in adequate locations, which allow for leak-proof storage Do not dispose of paint and other waste containers except through adequate handling procedures Ensure workers are familiar with safety regulations and storage requirements for each product.	Construction Contractor	
	Construction works on site may impact the quality of surface waters (small natural ponds) and subsequently ground water	The site will establish appropriate water and sediment control measures such as e.g. silt fences to prevent water sediment from moving off site and causing pollution. Collectors will be provided to avoid surface water dispersion in case of watering of sand or gravel to control the dusts Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies, and will be adequately collected and managed Before starting the painting activity, the bottom will be covered by plastic paper to ensure collection of colour drops in the soils. After finalization of work this plastic will be removed and disposed at places defined by local authorities. Prepare mixed cement etc. in isolated space. Pave with cement a surface of 20m ² in appropriate distance and into the warehouse territory, avoiding penetration in ground layers of several building material components. Avoid repair, refuelling or any interventions on equipment on unpaved areas with inadequate leak control trays. Information of workers and operators in the importance of respecting the preventions to avoid possible contamination	Construction Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
	Workers safety	provide workers with safety instructions and protective equipment; safe organization of bypassing traffic	Construction Contractor	
	Workplace disputes and concerns	Labour Grievance Mechanisam in place	PMU/Contractor	
	Community health and safety	<p>Preparation of all pertaining parts of Construction H&S Management Plan (OHS, community safety plan, traffic management plan, hazardous materials safety plan, training programme, emergency preparedness and response etc.)</p> <ul style="list-style-type: none"> - Traffic Management Plan <p>Following emergency preparedness and response plans will be prepared, as a minimum:</p> <ul style="list-style-type: none"> - Spill Response Plan, - Fire Response Plan (fire and explosion hazards, identify evacuation routes; - Traffic Accident Response Plan - Structure Collapse Preparedness and Response Plans - Flooding preparedness and response plan - Unexploded ordnance preparedness and Response Plan (which will include Unexploded Ordnance Chance Finds Procedure; <p>Minimum content of plans - Organisational structure, Responsibilities, Communication, Procedures, Training, Resources.</p> <p>When required by the National Legislation, Contractor is obliged to consult relevant Institutions/Ministries and obtain approval for these plans.</p> <ul style="list-style-type: none"> - Security personnel Code of Conduct and awareness training - Avoid night time construction when noise is loudest. 	Construction Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
		<p>Avoid night-time construction using heavy machinery, from 22:00 to 6:00 near residential areas.</p> <ul style="list-style-type: none"> - No discretionary use of noisy machinery within 50m of residential areas and near institutions, manual labor can be used at this point. - Good maintenance and proper operation of construction machinery to minimize noise generation. - Where possible, ensure non-mechanized construction to reduce the use of machinery - Undertake regular maintenance of generatorregulate traffic and pedestrian circulation in instances of increased risk; put up signs visualizing construction site boundaries; 		
	Labor risks	Workers may raise their concerns (safety, discontent, maltreatment or else) through the Grievance Mechanism.	Construction Contractor	
	The overall worker safety, and risks of unauthorized and un desired access to construction site	<p>The inhabitants leaving close to construction site will be notified of the works, objectives and temporary expected negative impacts through appropriate communication; public meetings, etc. All legally required permits will be acquired for construction and/or rehabilitation. Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighbouring residents and environment. Including organization of transport to minimize impacts on neighbourhood, and washing of vehicle tires to minimize spreading of debris on the roads. Workers will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses etc.). Workers also will be contracted respecting Serbian legislation, and the developer should respect all hygienic and safety rules conditioned by Serbian legislation. Life insurance of workers etc. will be provided by the employer. Technical security</p>	Construction Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
		measures will be provided by the employer. Emergency safety kit should be placed close to the working place for intervention in case of accidents. Emergency contacts and numbers should be clearly posted on site. In case of contact with polluted waters of channels or sediments the workers should have safety clothes. Appropriate warning signposting of the working sites, visual barriers etc., will be used to prevent accidents.		
	Accidents during construction works may cause unintentional damage to the local infrastructure or power supply net	Ensure all adequate permits from local utilities have been obtained. Ensure familiarity with networks in the proximity of the site. In case of accidental disruption, immediately stop all works, notify proper authorities in Surcin and emergency remediation of damaged network in line with the legal requirements	Construction Contractor	
	Use of raw materials may pose an additional stress on the natural environment	Use raw materials (sand, gravel, stone) only from suppliers that have valid licenses issued by the Relevant Institution.	Construction Contractor	
	Noise generated during works may pose a threat and risk to the workers on site, animals and neighbouring properties	Construction noise will be limited to restricted times agreed to in the permit in respect with Serbian Environmental Legislation. During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed at station territory.	Construction Contractor	
	Works done on site may damage or permanently remove vegetation	Ensure no damage to vegetation occurs on site. In case of unavoidable damage, re-plant same species on site. Ensure visually the same appearance as before works started.	Construction Contractor	Temporary decrease of green cover efficiency
	Use of heavy-duty	Ensure local community is aware of any major transport requirements and disruptions to the regular traffic	Construction Contractor	Temporary decrease of green cover efficiency

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
	transport vehicles for materials on site can cause local traffic disturbances	pattern. Adequately manage traffic and use postings to warn others of possible congestion.		
	Construction material leftovers after the closure of temporary construction sites	All shivers and material that remain after the closure of temporary construction sites are to be removed from the location and reused/recycled where possible. All remains are to be disposed of in a manner that will not be harmful to environment; this is to be done by companies that have permits to perform such works	Contractor	Problems should be regulated through the Works execution contract.
MAINTENANCE	Construction site			
	Obligation of publishing the results of archaeological excavations	It is necessary to provide funding for storing, publishing and presenting for goods which will be discovered, archaeologically excavated and researched, documented and conserved for the sake of permanent scientific and professional presentation encompassed in an investment project	Investor PWMC "Srbijavode"	
	Possible air, water and soil pollution / dust, vehicle exhaust, fuel and lubricants spills	apply best engineering practice in safe storage and handling of lubricants, fuel and solvents by secured storage; ensure proper loading of fuel and maintenance of equipment; collect all waste and dispose in line with the Law on waste management ("Official Gazette of RoS" No. 36/09, 88/10, 14/16); Organize and cover material storage areas; selecting areas for washing that are not free draining directly or indirectly into watercourse (Sava River); dispose waste material at location protected from washing out	Maintenance Contractor	

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Phase	Problem/activity impact	Mitigating measure	Institutional responsibility	Comment
Operation	Improper waste water management may cause contamination of ground waters	Avoid any activities that may leak hazardous constituents into the ground; Ensure the existing septic tank is regularly emptied.	Operator of warehouse and Surcin Municipality	
Operation	Improper solid waste collection and management may pose a threat to soil and water quality	Set up proper waste management procedures, including separation of waste into oily and hazardous waste, regular municipal and green waste which can be composted. Ensure sufficient waste collection bins are available on site and that regular collection of wastes is ensured. Isolate the space of collection been and ensure frequent sanitation from authorized entities.	Operator of warehouse with local waste collection utility	
Operation	Leaks and spills in station can pollute the surface water	Have in place a leak control action plan. Provide leak proof bins for collection of oily wastes or equipment which can drip oil. Ensure waste is adequately managed	Operator of warehouse and authorized company for management of such wastes	

5. ENVIRONMENTAL AND SOCIAL MONITORING ACTIVITIES

DWM/PMU and PSC will monitor overall environmental performance during project implementation, as put forth in the subject ESMP document.

For each of the environmental components, the monitoring plan specifies the parameters to be monitored; location of the monitoring sites and duration of monitoring. The monitoring plan also specifies the applicable standards, implementation and supervising responsibilities.

In addition to the critical locations selected during design stage, the environmental monitoring will also be done at the construction camp site and any other plant site as determined relevant during repair / reconstruction works stage.

World Bank guidance on the environmental aspects of project monitoring, including its health and socio-economic aspects, is provided in Environmental Assessment Sourcebook Update 14 Environmental Performance Monitoring and Supervision (June 1996).

The project's monitoring program included air, water, noise, soil and social impacts occurring during construction and operation phases, unscheduled environmental compliance inspections during construction, final inspection upon completion to ensure site condition is satisfactory, and assessment of sites prior to and after construction to ensure no loss of natural values.

Elements of an environmental performance-monitoring program:

Objectives

Indicators linked to project impacts and mitigation measures

Measured parameters

Institutional responsibilities, timing

Reporting arrangements

Cost and financing provisions

The following table presents the monitoring activities and responsibilities over the implementation of proposed mitigation measures, during execution of SDIP sub-project Surcin.

5.1. Monitoring Plan for SDIP Sub-Projects SURCIN

Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
CONSTRUCTION						
Material transport						
<i>Concrete and Asphalt Quarries</i>	Possession of environmental permits for concrete and asphalt plants and quarries and other suppliers from which material is supplied	Legal entities that own the plants	Insight into the documentation	During material supply	ensure compliance of the plants with environmental and social provisions and health and safety at work	Supervision body
<i>Stone</i>	truck load covered or wetted	job site	supervision	unannounced inspections during work, at least once per week	and safety requirements and enable as	Supervision Contractor
<i>Sand and gravel</i>	truck load covered or wetted	job site	supervision	unannounced inspections during work, at least once per week	little disruption to traffic as it is possible	Supervision Contractor
<i>Traffic management</i>	hours and routes selected	job site	supervision	unannounced inspections during work, at least once per week		Supervision Contractor
CONSTRUCTION						
Construction Site						
<i>During construction</i>	Chance findings	On site	Through site log	Regularly through construction works	To ensure adequate management of chance findings	Contractor to implement, Supervisor to review and report on

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Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>During construction</i>	Does the construction site meet the criteria from the guidelines for good construction practice	At the construction site	Visual supervision. Insight into the documentation.	During the works execution	Ensure application of good construction practises and Site Orgazation Plan	Supervision body
<i>During construction</i>	Working hours control	At the works execution location	Visually and comparison with the Site Orgazation Plan	Upon received citizens' complaints	Ensure limiting of construction generated impacts to citizens, protection if workers rights	Supervision body
<i>Dust</i>	air pollution (solid particles)	at and near job site	inspection and visual observation	unannounced inspections during material delivery and construction	health and safety requirements and enable as little disruption to traffic as it is possible	Supervision Contractor

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Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>During construction</i>	Air and Soil quality	On construction site and surrounding areas	<p>Visually inspect dust generation and control. Inspect presence and if any smell is emitted from the septic tank on site. Visually inspect presence of clandestine waste on site and in surroundings.</p> <p>Visually inspect for leaks of oily materials.</p> <p>Keep proof of waste being collected by authorized company.</p> <p>Visually inspect signs of open burning of wastes.</p>	Continuously during construction works	To ensure works are conducted as per the utmost safety and environmental protection standards	Contractor to implement, Supervisor to review and report on
<i>Workers safety</i>	protective equipment; organization of bypassing traffic	job site	inspection	Unannounced inspections during work. It is recommended to use H&S template for this purpose (next table)		Supervision Contractor

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Environmental and Social Management Plan - ESMP

Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>During construction</i>	Notification, information of workers for the importance of environmental and hygienic protection, Worker and farmers safety and health	On construction site	Maintain a log of workers and neighbour notification, all information efforts, permits obtained, supervisor will provide regular reports on ESMP compliance, worker safety, and on possible complaints. Number of registered accidents Existence of hygienic Conditions for workers, Protective equipment application Appropriate signs will be inspected visually	Continuously during construction works	To ensure works are conducted as per the utmost safety and environmental protection standards	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Noise levels	On construction site and surrounding areas	Ensure compliance with permit as per Serbian law. Measurements on complaints from neighbours.	Continuously during construction works	To ensure noise levels do not exceed permissible	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Water Quality	On construction site and surrounding areas	Visually and upon complaints of, waste materials in small ponds, spills or leaks.	Continuously during construction works	To ensure there is no pollution caused to the waters	Contractor to implement, Supervisor to review and report

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Environmental and Social Management Plan - ESMP

Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>Before/during construction</i>	Isolation of septic tank	On construction site	Visually or by penetration	In the reconstruction	To ensure there is not risk of contamination by waste waters	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Waste management	On construction site and surrounding areas	Visually for separation of wastes, review receipts from the collection company, or notification from the commune on the proper site of the disposal	Continuously during construction works	To ensure there is no risk of environmental pollution caused by construction works	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Damage to vegetation or other specific habitats	On construction site	Site log and visual inspection	Continuously during construction works	To ensure no damage to vegetation and specific habitats	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Storage of paint, oil or other hazardous materials	On site	Visually ensure proper storage, and no leaks or spills	Continuously during construction works	To minimize risks of pollution of hazardous materials	Contractor to implement, Supervisor to review and report on
<i>During construction</i>	Quality of executed works Quality of material that is installed	At the construction site	Visual monitoring and through register	Permanently during the works execution and construction site removal	Ensure quality of works	Supervision

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Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>After construction</i>	Waste remnants and soil degradation	At the project location	Visually	After the works completion		Contractor Supervision
<i>Worker's rights</i>	proof of lawfull employment	job site/Contractor's office	inspection	unannounced inspections during works execution	ensure worker's enjoy rights guaranteed by Law	Labor Inspection
Duirng Construction	number of registered accidents existence of hygienic conditions for workers, Protective equipment application	at the construction site	visually and insight into the register	permanently during the works execution	ensuring adequate health and safety and working conditions, ensuring works execution in accordance with relevant labor legislation	Contractor, Supervision
OPERATION						
<i>Increased speed</i>	<i>vehicle</i> condition of traffic signs; vehicle speed	Approach roads to the construction site	visual observation; speed detectors	unannounced	enable safe traffic flow	Traffic Police
<i>Erosion, hazardous conditions</i>	<i>rockfall,</i> section included in project	condition of hazard signs	visual observation	during maintenance activities		Contractor

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Environmental and Social Management Plan - ESMP

Phase	What is the parameter to be monitored?	Where the parameter should be monitored?	How the parameter should be monitored?/ type of monitoring equipment	When the parameter should be monitored? (frequency of measurement or continuous)	Why the parameter should be monitored? (optional)	Institutional responsibility
						Operate
<i>During operation/ maintenance</i>	Waste collection and management	On site	Visually for separation of wastes, review receipts from the collection company, or notification from the municipality on the proper site of the disposal	Continuously during construction works	To ensure there is no risk of environmental pollution from improper wastemanagement	Warehouse operator
<i>During operation/ maintenance</i>	Septic tank maintenance – clearing and adequate disposal of wastes	On site	Visually, or through measuring flow.	Continuously	To ensure that no contamination occurs from waste waters	Warehouse operator
<i>During operation/ maintenance</i>	Respecting of worker safety measures	On site	Visually, and ensure compliance with plan	Continuously	No life risk for workers and operators	Warehouse operators
<i>During operation/ maintenance</i>	Leaks and spills in station	On site	Visually, and ensure compliance with plan	Continuously	To ensure no leaks of oils or other materials pollute the environment	Warehouse operator

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT RESPONSIBILITIES

For each potential impact the ESMP identifies:

- the proposed mitigation measure(s); and
- the parties or agencies charged with implementing those measures, separated into:
 - Executing agencies responsible for executing the measure. For this specific assignment the executing agencies (e.g. contracted design institutes) shall ensure that all necessary agreements and permits (e.g. EIA conclusion, permits for water use and discharge and for the disposal of excavated materials, wastes, and demolition debris) are obtained from relevant state and local authorities before the construction works are tendered out. Construction contractors shall take the responsibility for physical implementation of mitigation measures provided under the ESMP during the construction phases according to the Bank's policies and Serbia environmental legislation.
 - Supervising agencies responsible for supervising the executing agencies to ensure that they execute the mitigation measures as planned. The Directorate of Water and Sava and Drina River Corridors Integrated Development Program Project Management Unit (PMU) will be responsible for supervising the timely, proper and reliable implementation of works and measures in the consequence provided by the ESMP. PMU will also ensure that all necessary agreements and permits are obtained by appropriate contractors from relevant state and local authorities before the construction works are tendered out. The World Bank during supervision missions may request randomly to check if such permits are issued and are valid (e.g., not expired) as well as if the ESMP mitigation and monitoring aspects are implemented on the ground during the construction phases according to the Bank's policies and Serbia environmental legislation.
 - Various Ministries give different permits. Ministry of Finance together with Ministry of Construction, Traffic and Infrastructure and Ministry of Environmental Protection control License process for works. MAFWM with Directorate of Water, The Public Water Resources Management Companies "Srbijavode", "Beogradvode" and "Vode Vojvodine" providing preparation of water resources management technical documentation, different kind of license requested for works and supervise construction, organization and implementation of water pollution protection measures. Hydro meteorological Institute takes water samples and monitors the quality of water.

6.1. Environmentally sound clauses for civil works contracts

Most construction phase impacts will be possible to mitigate by including appropriate clauses into the civil works contracts. Revisions of clauses should cover, but not limited to, the following issues:

- Compliance with general national environmental guidelines;
- Compliance with relevant World Bank Environmental and Social Standards;
- Protection of Historic-cultural monuments;
- Adequate disposal of construction and excavation wastes;
- Proper location of construction camps;
- Restoration of the quasi-original conditions of landscape in construction sites after works completion;
- Occupational Health & Safety (Consultants and contractors working on the program will be required to adhere to all applicable laws and regulations controlling workplace health and safety), etc.

Construction works contracts shall include this ESMP with its Environmental and Social Mitigation Plan and Environmental and Social Monitoring Plan presented within the chapter 4 and chapter 5 of this ESMP document. This ESMP document will be a part of the bidding and contractual documents for which the contractor hired will be responsible to implement and to ensure that all works are completely conducted in a manner which will not generate negative impacts to the environment. The works Supervisor will ensure compliance with the ESMP listed measures and provide reports on compliance.

7. IMPLEMENTATION ARRANGEMENTS

The Regional Steering Committee together with the Regional Coordination Unit will be responsible for policy advocacy and coordination at a regional level, while at a national level the two PIUs formed in the Water Directorate and the Ministry of Construction, Transport and Infrastructure will be responsible for project management functions and day to day operations.

While the National PIUs will be primarily responsible for M&E in respective countries, the **International Sava River Basin Commission (ISRBC)** will be responsible for overall monitoring and evaluation (M&E)

implementation and coordination between the riparian countries and will serve as a liaison with the WB at the regional level and PIUs in each of the riparian countries/entities. An Integrated Management Information System (MIS) system will be developed and implemented as part of the program to support implementation and reporting.

8. MONITORING AND REPORTING ARRANGEMENTS

8.1. SDIP Project Monitoring

The SDIP project will be monitored by PIUs under the DWM and MCTI. Information and data collected at each of the implementation agencies will be fed into overall M&E. The ISRBC and PIUs will collect and present data and reports for semi-annual reviews by the Regional Committee and respective National institutions responsible for project implementation, in conjunction with Bank missions.

The Construction contractor is obliged to perform all monitoring activities (sampling, measurement, etc.) prescribed within the Monitoring Plan of ESMP document produced for project on which the Contractor is engaged.

Supervision Consultant is responsible to monitor all construction activities, including environmental protection during project rehabilitation. PSC will be authorized to perform additional sampling in case he finds this needed.

8.2. Environmental Monitoring Plans

Monitoring plan for SDIP projects should be in respect of the tender documents. The main components of the monitoring plans include:

- Environmental and social issues to be monitored and the means of verification
- Specific areas, locations and parameters to be monitored;
- Applicable standards and criteria;
- Monitoring of the procurement of materials (checks that valid permits are in place)
- Duration
- Institutional responsibilities for monitoring and supervision

8.3. Reporting Arrangements

8.3.1. Contractor to PMU

The Contractor will prepare his compliance reports in respect to ESMP and his SSIP as a Quarterly Progress Reports and submit them to PMU, in both Serbian and English language, in hard copy and electronic versions.

Construction Contractor will provide quarterly reports to PMU which document the environmental mitigation and protection measures, together with prescribed monitoring activities carried out during that quarter's reporting period. Construction Contractor will take care of the environment quality according to the mitigation and monitoring plan which are part of ESMP.

The same applies to the Environmental Monitoring and Supervision Contractors for their part of mitigation and environmental monitoring activities.

If any kind of accident or endangerment of environment happens, reporting will be immediate. PMU and the Contractor have joint responsibility for reporting and investigating incidents. The Contractor is obliged to inform the project manager and local authorities about accident immediately after it happened.

8.3.2. Project Supervision Consultant to PMU

The findings of the regular monitoring activities, including activities specified in the Generic Monitoring Plan, carried by the Contractor will be included in the quarterly PSC progress reports.

8.3.3. PMU to MAFWM, MCTI, WB, Semi-Annual Environmental & Social Report

Each Contractor is obliged to produce and deliver to PMU an Semi-Annual Environmental and Social Report covering all project activities during 6 month period PMU shall provide Semi-Annual reports to MAFWM and WB regarding the status of implementation of mitigation measures by the Contractors, additional mitigation

measures that may need to be implemented, incidents of non-compliance with applicable environmental permits, complaints received from local residents, NGOs, etc. and how these were addressed. In case of fatalities or major incidents on site the PMU will immediately report to WB.

Monitoring and compliance in accordance with ESMF and site specific ESMPs, including monitoring of implementation of site-specific measures on each sub-project/section during project implementation will be undertaken by PMU and its implementation unit, and reported in writing to the Bank on semi-annual basis. An environmental specialist will be appointed to the Project by PMU to ensure quality in the implementation of ESMPs.

In terms of social monitoring each Contractor shall keep records of grievances received (if any) directly and confirm they have been transmitted to the GRM. The Contractor shall keep monthly employment progress record per template to be provided by the Social Consultant of the PMU to monitor the enhancement of positive impacts of local employment created during the life of the Sub-Project.

Land acquisition shall be monitored weekly by the Social Consultant to inform the Monthly progress report which is already submitted at the end of each month to the World Bank to verify compliance with requirements set forth in the RPF, subsequent ARAP and this ESMP.

9. PUBLIC CONSULTATIONS AND PUBLIC DISCLOSURE OF THE ESMP

In accordance with WB ESS 10 a draft version of ESMP was publicly disclosed in the Ministry of Agriculture and Environmental Protection, the Directorate of Water building and in the city of Belgrade, Surcin municipality during October 2019, on period of two weeks. The public consultation meeting will be held in the municipality of Surcin, in Belgrade.

10. REFERENCES

- 01 Terms of Reference for production of Technical Documents, Central Warehouse for Flood Protection in Surcin, PWMC "Srbijavode", "Hidrozavod dtd", 2019
- 02 Architectural Conceptual Design Solution, Andzor Engineering, 2019
- 02 The World Bank Environmental and Social Framework, 2017
- 02 Environmental Assessment Sourcebook No 25, Environmental Management Plans, The World Bank Environment Department, January 1999
- 03 Project Appraisal Document, PAD3402, Sava Drina River Corridors Integrated Development Program, 2019
- 04 Project Information Document, PIDC25739, Project Information Document (Concept Stage) - Sava Drina River Corridors Integrated Development Program – P168862, February 2019
- 05 Environmental and Social Management Framework, ESMF, Sava Drina River Corridors Integrated Development Program – P168862, October 2019
- 06 Resettlement Policy Framework, RPF, Floods Emergency Recovery Project – P168862, October 2019

Annex 1

LEGISLATION

MAIN SERBIAN LEGISLATION:

ANNEX 1: RELEVANT NATIONAL LEGISLATION AS OF APRIL 2018

The main laws and regulations currently in force in Republic of Serbia which are relevant to the environmental protection during planning, design, construction and operating of this Project are listed below:

1. Law on planning and construction ("Official Gazette of RoS" No. 72/2009, 81/2009, 64/2010, 24/2011, 121/2012, 42/2013, 50/2013, 98/2013, 132/2014, 145/2014)
2. Law on nature protection ("Official Gazette of RoS", 36/09, 88/10, 91/10, 14/16)
3. Law on environmental protection ("Official Gazette of RoS" No. 135/04, 36/09, 72/09, 43/11, 14/16)
4. Law on EIA ("Official Gazette of RoS" No. 135/2004, 36/09)
5. Law on Strategic EIA ("Official Gazette of RoS" No. 135/04, 88/10)
6. Law on waste management ("Official Gazette of RoS", 36/09, 88/10, 14/16)
7. Law on noise protection ("Official Gazette of RoS", 36/09, 88/10)
8. Law on water ("Official Gazette of RoS", 30/10, 93/12, 101/16)
9. Law on forest ("Official Gazette of RoS", 30/10, 93/12, 89/15)
10. Law on air protection ("Official Gazette of RoS", 36/09, 10/13)
11. Law on Safety and Health at Work ("Official Gazette of RoS", 101/05, 91/15, 113/17)
12. Agricultural Land Law, ("Official Gazette of RoS" No. 62/06, 65/08, 41/09, 112/2015, 80/2017)

Regulations established on the basis of the Law on EIA include the following:

13. Decree on establishing the List of Projects for which the Impact Assessment is mandatory and the List of projects for which the EIA can be requested ("Official Gazette of RoS" No. 114/08)
14. Rulebook on the contents of requests for the necessity of Impact Assessment and on the contents of requests for specification of scope and contents of the EIA Study ("Official Gazette of RoS" No. 69/05)
15. Rulebook on the contents of the EIA Study ("Official Gazette of RoS" No. 69/05)
16. Rulebook on the procedure of public inspection, presentation and public consultation about the EIA Study ("Official Gazette of RoS" No. 69/05)
17. Rulebook on the work of the Technical Committee for the EIA Study ("Official Gazette of RoS" No. 69/05)
18. Regulations on permitted noise level in the environment ("Official Gazette of RoS" No. 72/10)
19. Decree on establishing class of water bodies ("Official Gazette of SRS" No. 5/68)
20. Regulations on dangers pollutants in waters ("Official Gazette of SRS" No. 31/82)

Regulation on Labour, Working Conditions and Gender equality

21. Labor Law ("Official Gazette of RoS" No. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017, 113/2017 and 95/2018)

22. Law on Civil Servants ("Official Gazette of RoS" No. 79/2005, 81/2005, 83/2005, 64/2007, 67/2007, 116/2008, 104/2009, 99/2014, 94/2017 and 95/2018)
23. The Law on Peaceful Settlement of Labor Disputes ("Official Gazette of RoS" No. 125/2004, 104/2009 and 50/2018)
24. Law on Employment and Unemployment Insurance ("Official Gazette of RoS" No. 36/2009, 88/2010, 38/2015, 113/2017 and 113/2017)
25. Law on Employment of Foreign Citizens ("Official Gazette of RoS" No. 128/2014, 113/2017, 50/2018 and 31/2019)
26. Law on Retirement and Disability Insurance ("Official Gazette of RoS" No. 34/2003, 64/2004, 84/2004, 85/2005, 101/2005, 63/2006, 5/2009, 107/2009, 101/2010, 93/2012, 62/2013, 108/2013, 75/2014, 142/2014, 73/2018 i 46/2019)
27. Law on Health Insurance ("Official Gazette of RoS" No. 25/2019)
28. Law on the Prohibition of Discrimination ("Official Gazette of RoS" No. 22/2009)
29. Law on the Prevention of Harassment at the Workplace ("Official Gazette of RoS" No. 36/2010)
30. Rulebook on Conduct of Employers and Employees in Relation to Prevention and Protection from Harassment at Work ("Official Gazette of RoS" No. 62/2010)
31. Law on Protection of Whistle Blowers ("Official Gazette of RoS" No. 128/2014)
32. Law on Gender Equality ("Official Gazette of RoS" No. 104/2009)

Other relevant Serbian legislation

33. Law on confirmation of convention on information disclosure, public involvement in process of decision making and legal protection in the environmental area ("Official Gazette of RoS", 38/09)
34. European Environment and Health Committee. Serbia. Copenhagen, WHO Regional Office for Europe, 2006 (http://www.euro.who.int/eehc/implementation/20061010_9 accessed 29 December 2009).
35. National Assembly. Law on Protection against Environmental Noise. Official Gazette of the Republic of Serbia, No. 36/09, 88/10.
36. National Assembly. Law on Waste Management. Official Gazette of the Republic of Serbia, 2009, No. 36/09.
37. National Assembly. Constitution of the Republic of Serbia. Official Gazette of the Republic of Serbia, 2006, No. 98/06.
38. National Assembly. Law on Environmental Protection. Official Gazette of the Republic of Serbia, 2004, No. 135/04.
39. National Assembly. Law on Air Protection. Official Gazette of the Republic of Serbia, 2009, No. 36/09.
40. National Assembly. Law on Management of Chemicals. Official Gazette of the Republic of Serbia, 2009, No. 36/09.

41. National Assembly. Law on Biocidal Products. Official Gazette of the Republic of Serbia, 2009, No. 36/09.
42. National Assembly. The Law on Environmental Protection. Official Gazette of the Republic of Serbia, 2009, No. 36/09.
43. National Assembly. Law on Occupational Safety and Health. Official Gazette of the Republic of Serbia, 2005, No. 101/05
44. National Assembly. Law on Environmental Impact Assessment. Official Gazette of the Republic of Serbia, 2004, No. 135/04 (<http://www.basel.int/legalmatters/natleg/serbia-02e.pdf>, accessed 11 January 2010).
45. Federal Assembly. Regulation on permitted level of noise in the environment. Official Gazette of the Republic of Serbia, 2010, No. 72/10.
46. National Assembly. Law on Integrated Pollution Prevention and Control. Official Gazette of the Republic of Serbia, No. 135/04 (<http://www.basel.int/legalmatters/natleg/serbia-04e.pdf>, accessed 11 January 2010).

Annex 2

STAKEHOLDER ENGAGEMENT

Identified Stakeholders

Stakeholders can be defined as those people and organisations who may affect, be affected by, or perceive themselves to be affected by, a decision or activity. For the Project, the stakeholders range according to the following main groups:

Potential affected parties:

- Employees of PWMC and Contractors;
- Representatives of companies operating the area immediately adjacent to the Project;
- Residents from settlements within the zone of influence of the Project
- Statutory regulatory authorities, on local or regional level, such as: Local landowners and leaseholders within Project easements; and Potentially affected industries/businesses.

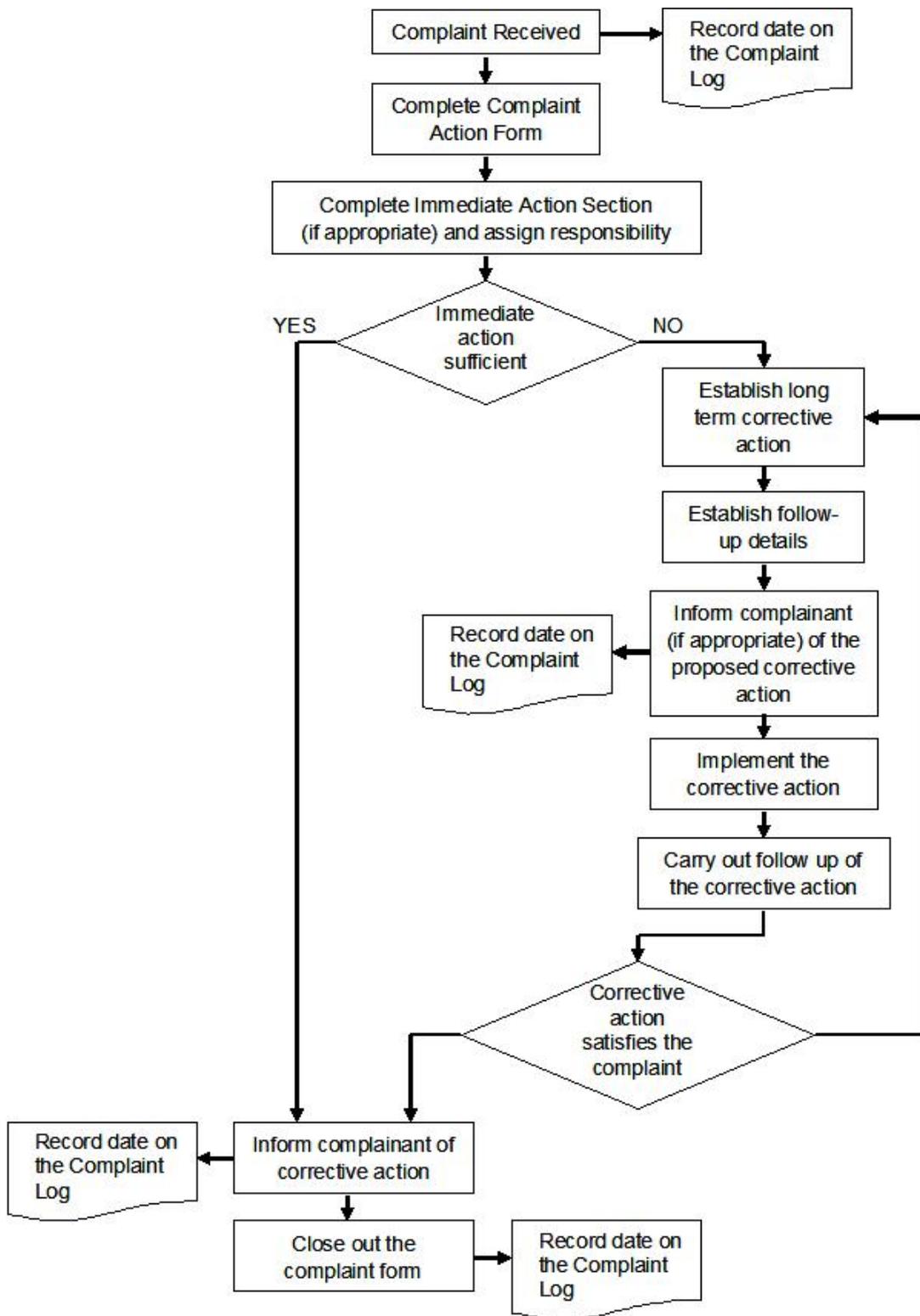
Interested parties:

- General public;
- Other companies operating on the National Grid; and
- Non-Governmental Organisations (NGO).

It is acknowledged that, as the Project develops, more stakeholders may be identified and engaged. In this regard, once identified, each stakeholder will be characterized in terms of their interests, concerns and requirements and will be included within this list.

Grievance mechanism and form

Flowchart of Complaints/Grievance Procedure



Grievances to be resolved within 15 working days.

SAVA AND DRINA RIVER CORRIDORS INTEGRATED DEVELOPMENT PROGRAM - SDIP
Environmental and Social Management Plan - ESMP

Grievance Reference Number (to be filled in by [name]):			
Contact Details	Name:		
	Address:		
	Tel:		
	e-mail:		
How would you prefer to be contacted? Please tick box	By post	By phone	By e-mail
Name and the identification information (from identity card).			
Details of your grievance. Please describe the problems, who it happened to, when, where and how many times, as relevant			
What is your suggested resolution for the grievance?			
How to submit this form to /[name of concessionaire]	By Post to:		
	By hand: please drop this form at		
	By e-mail: Please email your grievance, suggested resolution and preferred contact details to:		
Signature		Date	

Annex 3

REPORT ON PUBLIC CONSULTATIONS

ANNEX 3: REPORT ON PUBLIC DISCLOSURE AND PUBLIC CONSULTATION

This section will be incorporated after the completion of public consultations.