

October 2024

NOVI SAD SOLAR THERMAL PLANT FEASIBILITY STUDY AND ENVIRONMENTAL AND SOCIAL ASSESSMENT

Novi Sad District Heating System



Stakeholder Engagement Plan

Table of Contents

1	Introduction	4
1.1	Project Context.....	4
1.2	Brief Project Description	5
1.3	Objectives and Scope of this Stakeholder Engagement Plan	6
2	Regulatory Requirements for Stakeholder Engagement	7
2.1.1	Local Legislation Requirements	7
2.1.2	EBRD Requirements.....	7
3	Stakeholder Identification and Engagement Plan	8
3.1	Introduction	8
3.2	Previous Stakeholder Engagement.....	8
3.3	Project Stakeholders.....	8
3.4	Planned Information Disclosure and Consultations	10
3.5	Engagement Objectives and Methods	12
4	Grievance Management.....	14
4.1	Overview	14
4.2	Submitting Grievances	14
4.3	Recording and Acknowledging Grievances	14
4.4	Assisting Complainants	15
4.5	Grievance Resolution	15
4.6	Contact Information for Sending Grievances	15
5	Monitoring and Reporting	16
6	Appendices.....	17
6.1	Project Grievance Form.....	17
6.2	Grievance Registry - Template.....	18
6.3	Internal Stakeholder Engagement Registry – Template	19

List of Abbreviations

DH	District Heating
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
NTS	Non-technical Summary
PIU	Project Implementation Unit
PR	Performance Requirement
PTES	Seasonal Pit Thermal Energy Storage
SEP	Stakeholder Engagement Plan

1 Introduction

1.1 Project Context

EBRD is considering providing financing to the Public Utility Company (PUC) 'Novosadska toplana' (the "Company") for the development, construction and integration of a solar-thermal system within the existing district heating (DH) network (the "Project"). The main Project components are two pit thermal energy storages (PTES), a solar thermal plant, and a technical building housing the heat pump system and e-boilers. The Government of the Republic of Serbia (RoS) has classified this Project as one of the three major energy projects for 2024. A brief description of the Project is provided in [section 1.2](#) below.

The Project has been categorised as Category "B" in accordance with the EBRD's Environmental and Social Policy (2019)¹.

Key benefits of the Project include:

- > Generation of renewable energy, contributing to the production of clean, pollution-free energy and reducing reliance on fossil fuels (expected renewable energy production is 60,842 MWh/year),
- > Contribution to air pollution reduction by decreasing emissions of air pollutants, primarily NOx and CO,
- > Employment opportunities during operation (approx. 10 new employees for managing the solar-thermal system),
- > Stability in heating costs through the integration of solar thermal technology into heating systems. This shift would decouple heating costs from fluctuations in gas prices, providing consumers with a more consistent and reliable pricing framework.

Demonstrating its commitment to implementing the solar-thermal project, the City of Novi Sad included this Project in the General Urban Plan of the City of Novi Sad until 2030. This document was adopted by the City Assembly in July 2022. Additionally, the City Assembly has incorporated this Project into the Development Plan for the City of Novi Sad until 2030, officially adopted in December 2023. Consequently, the Project has been included in all pertinent spatial planning documents.

The Project will be managed by the Company's Project Implementation Unit (PIU).

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

1.2 Brief Project Description

The Project location is within the City's industrial zone, adjacent to the City's existing DH system and the operational CHP plant 'TE-TO Novi Sad'. The broader Project location is shown in the figure below.



Figure 1-1: Project location: Left – City of Novi Sad with the Project location marked with a red circle; Right: enlarged view of the Project location

The key Project components are:

- > **two pit thermal energy storages (PTES)** – north and south,
- > **solar thermal plant**, and
- > **technical building**, housing the **heat pump** and **e-boilers**, as well as other supporting components.

A 3D visualisation of the future solar-thermal system is presented in the following figure.

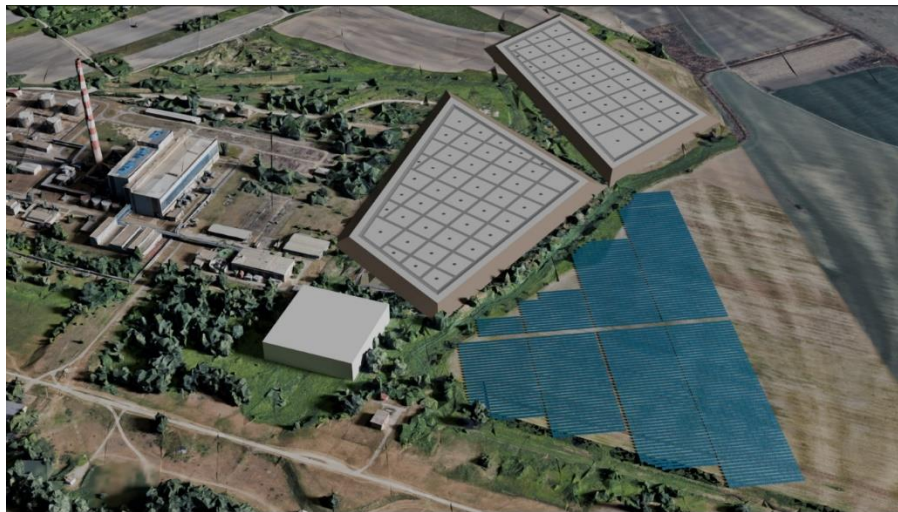


Figure 1-2: Visualisation of the future solar-thermal system (including north and south PTES, solar-thermal plant and technical building)

The solar-thermal system will be constructed on a 53.7-ha plot, where approx. 20.7 ha is allocated for the construction of PTES systems and approx. 33 ha for the installation of solar thermal plant (solar collectors).

The PTES area is situated between the City's drinking water protection zone II and 'TE-TO Novi Sad'. The area designated for solar thermal plant (solar collectors) falls within the City's II water protection zone. Although this area is not currently used for water supply, there are future plans to incorporate it as an additional source. As the Project

area is within this protection zone, the only permissible use of the land is for installing solar collectors². The construction of PTES systems in this zone is prohibited.

The Project area can be accessed via a local road leading to the PTES, solar thermal plant and technical building plots, which is situated on an embankment designed for flood protection at an elevation of +8.00 m relative to the Danube River. Additionally, access is possible through roads used for the 'TE-TO Novi Sad' infrastructure, which borders the PTES plot.

All plots needed for the Project are registered as public property.

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

1.3 Objectives and Scope of this Stakeholder Engagement Plan

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

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

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

² Confirmed by the *General Urban Plan of the City of Novi Sad until 2030*, adopted by the City Assembly of Novi Sad in July 2022.

2 Regulatory Requirements for Stakeholder Engagement

2.1.1 Local Legislation Requirements

Serbia has specific laws with requirements regarding disclosure and transparency:

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

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

2.1.2 EBRD Requirements

In its Environmental and Social Policy 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. [PR 10 \(Information Disclosure and Stakeholder Engagement\)](#) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

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

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

3 Stakeholder Identification and Engagement Plan

3.1 Introduction

Communication and information channels have been designed in this SEP considering the specific needs of various stakeholder groups. **The Company acknowledges the significance of meaningful and timely engagement with stakeholders to ensure the success of the Project.** Through this engagement process, the Company aims to gather valuable feedback, comments and suggestions from stakeholders to enhance the Project's design and maximise local benefits.

3.2 Previous Stakeholder Engagement

The Company has engaged in various activities to inform the public and involve stakeholders in the early phases of the Project. This included public outreach efforts and meetings with key local community members and government representatives to discuss the Project. However, there have not been any meetings with the public or non-governmental organisations (NGOs) at this stage.

The public was provided the opportunity to be informed about the Project through organised reviews and public discussions as well. As mandated by national legislation, public discussions on the General Urban Plan of the City of Novi Sad were held in early 2022. In addition, the competent authorities held public discussions and a public review of the Novi Sad City Development Plan 2023-2030, including the Novi Sad DH System Development Strategy, during the period from October 30 to November 12, 2023.

3.3 Project Stakeholders

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

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

Stakeholder mapping was carried out during the development of this SEP based on site visits to the Project area, a review of available Project documentation and discussions with Company representatives. The identified key Project stakeholders are listed below. It should be noted that any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

1. Local communities: The Project site is situated within the industrial zone “Sever 4”, housing 'TE-TO Novi Sad' and inactive refinery facilities. There are no houses within or near the Project site. The nearest settlement is a small city neighbourhood named *Sangaj*, approx. 900 m away from the Project area, with a population of 1,748 inhabitants. *Sangaj* is encompassed entirely by the industrial zone designated as Work Zone North 4 and spans approx. 0.13 km². The settlement is not visible from the Project area, as it is situated on the opposite side of 'TE-TO Novi Sad'. Considering the distance and the nature of the construction works, minimal impact on residents of this settlement is expected, except for potential temporary increases in noise levels and traffic disruptions due to the movement of heavy vehicles (trucks) during construction activities. However, the increase in traffic is expected to affect only the peripheral part of the settlement. No specific vulnerable groups have been identified.

The land currently designated for the solar thermal plant is under lease granted by the Ministry of Agriculture, Forestry, and Water Management for agricultural purposes. The lessees, who are using this land for farming, will lose access to the plot once construction begins. According to the terms of these lease agreements, if the agricultural land is repurposed for construction, the lease will be terminated, and the lessees will no longer have rights to use the land. In light of this, it will be critical that the Ministry notifies the lessees well in advance of the planned start of construction to allow sufficient time to adjust their farming operations and make necessary arrangements to avoid any disruptions.

The community will be particularly interested in the Project's potential to address air pollution. Project implementation will promote the use of clean, renewable energy and reduce natural gas consumption, leading to an approx. 95% reduction in emissions of air pollutants (NO_x, SO_x, PM_{2.5}, PM₁₀, and CO). Urban areas often face higher levels of pollution compared to rural regions, and any initiative that contributes to reducing air contaminants could significantly benefit the City of Novi Sad and its surrounding suburban areas. The Project's potential to improve air quality will be an important factor for residents who are concerned about environmental and public health impacts.

The prospect of new job opportunities created by the Project is likely to attract attention from the local community. In an urban environment such as Novi Sad, where employment opportunities and economic development are crucial, the creation of new positions will be highly valued.

Users of district heating services in Novi Sad will have a strong interest in the Project. By reducing reliance on gas prices, which are subject to frequent fluctuations in the international market, the Project will help shield consumers from sudden price hikes. This would not only benefit households but also businesses and public institutions that rely on district heating.

2. Stakeholders with general interest in renewable energy projects, including potentially interested NGOs: This category of stakeholders encompass a broader spectrum of individuals and organisations that, while not directly affected by the Project, may hold an interest in its outcomes. This includes the general population of Novi Sad and Serbia as this is the first solar-thermal power plant in the country, as well as environmental NGOs (especially those with a focus on renewable energy and environmental sustainability). Even though such organisations have not yet demonstrated a specific interest in this Project, all will be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation (any organisations interested in the Project can send their contact details to the PIU to be included in this SEP and notified directly about Project events).

3. Relevant government and public entities: The key government and public entities relevant to the Project are presented in the table below.

Institution/organisation	Role relevant for the Project
Ministry of Finance	> borrower of the loan
Ministry of Environmental Protection (MoEP)	> issues opinions/approvals of EIA studies (MoEP will issue an opinion whether an EIA is required for this Project) > responsible for licensing, monitoring, data collection and inspection
Government of the Autonomous Province of Vojvodina	> responsible for issuing energy- and construction-related permits for this Project as defined by national legislation
City Administration for Environmental Protection of the City of Novi Sad	> responsible for administration and coordination of the following sectors on its territory: urban planning, construction and land use; agriculture; water management; forestry; environmental protection including nature resources management; and development of environmental programs in line with national programmes
Ministry of Mining and Energy	> Issues energy permits

Ministry of Agriculture, Forestry and Water Management	> manages the land required for the installation of solar collectors
PUC 'Novosadska toplana'	> responsible for Project implementation

4. Contractors or subcontractors for construction, monitoring and supervision of works, and their employees – these have not yet been selected, but are crucial stakeholders for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.

5. Company employees will be engaged in the Project's planning and execution, with emphasis on elements such as ensuring a safe working environment, promoting fair employment practices, and addressing other labour-related issues.

3.4 Planned Information Disclosure and Consultations

Effective stakeholder engagement relies on transparent information disclosure and meaningful consultations. This section details the Company's strategy and planned activities to keep all stakeholders informed and involved throughout the Project's lifecycle.

1. DISCLOSURE OF PROJECT DOCUMENTS

The Company will disclose the following to ensure stakeholders have access to important information from the outset of the Project:

- > this SEP,
- > the Project Grievance Form (*Appendix 6.2* of this SEP), and
- > the Non-technical Summary (NTS) of the Project.

These documents will be made publicly accessible in Serbian and English on the Company's website (www.nstoplana.rs), with this information prominently featured on the homepage and regularly updated to ensure transparency and visibility.

In addition, printed copies will be made available at the Company's User Centre (located at 1 Vladimira Nikolića Street, Novi Sad).

2. CONSULTATIONS DURING THE PRE-CONSTRUCTION PHASE

The PIU will organise at least one public consultation meeting in the pre-construction phase (during or after the Main Design is developed) to engage with stakeholders and present the Project (the design, the objectives, anticipated benefits, how specific issues will be addressed, the Project's grievance mechanism, etc.) and facilitate a platform for stakeholders to express their opinions and concerns. When selecting the location for this meeting, the PIU will prioritise accessibility and convenience for the majority of citizens. Potential locations include:

- > **The Assembly Hall of the City of Novi Sad:** A central and well-known venue that can accommodate a large number of attendees.
- > **The Company's User Centre:** A location already frequented by residents for utility-related matters; a familiar and accessible setting for community members.

The public will be informed about the exact date, time and venue where the meeting will be held, at least 2 weeks through the following channels:

- > Official website of the Company
- > Visible places within the Company's User Centre (e.g., building entrance, service counter area, etc.)
- > Visible places at or near the land plot intended for the solar thermal plant as well as near the Sangaj neighbourhood

- > Media with national frequency (digital and print) as well as local media (digital and print) with wide circulation in City of Novi Sad

The PIU will consider and address all comments and proposals received. A **summary report** (“comments matrix”) of the comments/proposals and the PIU’s responses will be published on the Company’s website within 10 days after the meeting.

3. INFORMING THE PUBLIC ABOUT CONSTRUCTION WORKS

The PIU will provide clear information about the planned construction activities, including location, start date, duration, potential traffic disruptions, and other public inconveniences. This information will be shared at least 15 days before and during the construction phase through the same channels listed above.

Once construction begins, the PIU will ensure that the Contractor places information boards at the construction site(s), displaying contact information for any third-party concerns. The boards will include the name, position, phone number, and email address of the designated contact person responsible for addressing issues.

4. INFORMING THE PUBLIC THROUGHOUT OPERATION AND MAINTENANCE

The PIU will:

1. Include the results of the stakeholder engagement process in annual E&S Reports to EBRD, summarising E&S impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.
2. Prepare a summary of these E&S Reports annually to ensure regular reporting to stakeholders and post the summaries online (without any confidential information) on the Company website.

3.5 Engagement Objectives and Methods

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

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

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
1. Local communities	<ul style="list-style-type: none"> ○ Air quality improvement (reduction in air pollution and public health benefits) ○ Potential employment opportunities ○ Protection from gas price fluctuations ○ Concerns about potential temporary increases in noise and traffic from heavy vehicles during the construction phase, impacting the peripheral areas of Sangaj ○ For lessees currently using the land intended for installing solar collectors: being notified about the planned Project in a timely manner 	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Access to Project disclosure package online and in printed form > Public meeting in the pre-construction phase > Disclosure of information on planned construction works 15 days in advance > For lessees currently using the land intended for installing solar collectors: the Company to notify the Ministry of Agriculture, Forestry and Water Management at the tendering stage so the lessees can be informed timely about the planned start of construction <p>Throughout the operation phase:</p> <ul style="list-style-type: none"> > Access to summary E&S Reports annually in the operation phase <p>Continuously (starting as early as possible and throughout all Project phases):</p> <ul style="list-style-type: none"> > Project grievance mechanism 	<ul style="list-style-type: none"> > Project disclosure package (SEP, NTS, Project Grievance Form) > Comments matrix (to be prepared after public meeting) > Information on the extent, timing and duration of planned works > Information on availability of grievance mechanism > Information on planned start of Project > Summarised E&S Reports (annually)
2. Stakeholders with general interest in renewable energy projects, including potentially interested NGOs	<ul style="list-style-type: none"> ○ Renewable energy development ○ Environmental impacts of the Project 	<p>Pre-construction, construction and operation phases:</p> <ul style="list-style-type: none"> > Consultations in the framework of permitting procedures; reporting and monitoring based on national legislation requirements 	<ul style="list-style-type: none"> > Information on planned Project activities
3. Relevant government and public entities	<ul style="list-style-type: none"> ○ Regulatory compliance and adherence to standards 	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Information through tendering and contracting <p>Construction phase:</p> <ul style="list-style-type: none"> > Communication via supervising engineers > Toolbox talks at construction sites on health and safety topics, Chance Find Procedure and other topics > Workers' grievance mechanism 	<ul style="list-style-type: none"> > Health and safety regulations > Environmental protection requirements > Information on workers' grievance mechanism
4. Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	<ul style="list-style-type: none"> ○ Project specifications and requirements ○ Health and safety ○ Labour and working conditions 	<p>Pre-construction, construction and operation phases:</p> <ul style="list-style-type: none"> > Project management channels > Workers' grievance mechanism 	<ul style="list-style-type: none"> > Project implementation arrangements > Information on workers' grievance mechanism
5. Company employees	<ul style="list-style-type: none"> ○ Safe working environment ○ Fair employment practices ○ Workload management 		

4 Grievance Management

4.1 Overview

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

Both the PIU and the contractors/supervision engineers on site will accept grievances associated with the Project. The PIU will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below.

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

4.2 Submitting Grievances

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

After the start of construction works, the Project Grievance Form may also be submitted directly to the contractor for construction works or the supervising engineer, which will forward any such received grievances to the PIU without delay (within 24 hours) to allow the PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the periods defined below).

The information boards to be placed at the construction site will clearly display contact information for third-party concerns (contact details of the dedicated contact person designated to address any issues or concerns raised by third parties - their name, position, phone number, and email address).

4.3 Recording and Acknowledging Grievances

The PIU will record all grievances in a Grievance Registry (format provided in [6.2 Grievance Registry - Template](#)), separate from the Stakeholder Engagement Registry ([Appendix 6.3 Internal Stakeholder Engagement Registry – Template](#) of this SEP), which details interactions with communities and stakeholders.

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

- > description of grievance, including an indication of the type (topic) of the grievance – such as: (i) grievances related to construction noise, dust or traffic, (ii) grievances related to gender-based violence and harassment, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- > details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project (*note: this information will be considered confidential and only disclosed to staff working on grievances*),
- > date of receipt of grievance and when acknowledgement returned to the complainant,

- > description of actions taken (investigation, corrective measures, preventive measures), and
- > date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution (see grievance close-out form below).

4.4 Assisting Complainants

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

4.5 Grievance Resolution

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

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

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

Anonymous complaints will also be addressed without delay, and proposed action to solve the raised issue will be published on the Company's website.

At all times, complainants may seek other legal remedies in accordance with the local legislation, including formal judicial appeal.

EBRD's Independent Project Accountability Mechanism: In addition to the Project-level mechanism managed by the PIU, the EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

4.6 Contact Information for Sending Grievances

Public Utility Company (PUC) 'Novosadska toplana' - **Project Implementation Unit**

Email: osj@nstoplana.rs

Tel: 0800/100-021

Address: Vladimira Nikolica 1, Novi Sad

5 Monitoring and Reporting

The results of the stakeholder engagement process will be included in **E&S Reports to EBRD** which will be prepared by the PIU, summarising E&S impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. A **summary of these E&S Reports** will be prepared by the PIU annually to ensure regular reporting to stakeholders and **posted online** (without any confidential information) on the Company's website.

The reports will include, in particular, the following information:

- > **Number and types (topics) of received community grievances** raised in the reporting period, (such as: (i) grievances related to construction noise, dust or traffic, (ii) grievances related to gender-based violence and harassment, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks) with indication of opened, resolved and closed grievances and whether they have been closed out within the period stated in the grievance mechanism,
- > **Number and types of information disclosure activities** through all channels,
- > **Place and time of consultation meetings held and other types of engagement activities**, with information on the number of participants, issues and concerns raised during meetings and information on how the issues raised were taken into consideration by the PIU.

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

[Appendix 6.3 Internal Stakeholder Engagement Registry – Template](#) of this SEP provides a template for tracking stakeholder engagement activities.

6 Appendices

6.1 Project Grievance Form

Reference Number	
Location <i>*Please indicate the name of the PVPP location</i>	
Full name (optional) <input type="radio"/> I wish to raise my grievance anonymously. <input type="radio"/> I request that you do not disclose my identity without my consent.	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ By Telephone: _____ By E-mail _____
Preferred language of communication	- Serbian - English (if possible) - Other _____
Description of Incident for Grievance	What happened? Where did it happen? To whom did it happen? What is the result of the problem?
Date of Incident / Grievance	
	<input type="radio"/> One-time incident/grievance (date _____) <input type="radio"/> Happened more than once (how many times? _____) <input type="radio"/> On-going (currently experiencing problem)
What would you like to see happen?	

Signature: _____

Date: _____

Please return this form to:

Public Utility Company (PUC) 'Novosadska toplana' - Project Implementation Unit**Email: osj@nstoplana.rs****Tel: 0800/100-021****Address: Vladimira Nikolica 1, Novi Sad**

6.3 Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with the Serbian Law on Personal Data Protection.

Stakeholder category and name <i>(E.g., affected resident, NGO...)</i>	Type of engagement <i>(E.g., official meeting, presentation, informal meeting...)</i>	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.					
2.					
3.					
4.					
5.					