



Stakeholder Engagement Plan

SABAC RESIDENTIAL BUILDINGS - ENERGY EFFICIENCY PROJECT

May 2019

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Public

Contact Details

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1. INTRODUCTION

1.1. Background

This document is a Stakeholder Engagement Plan (SEP) for the Sabac Residential Buildings Energy Efficiency Project in Serbia. This document identifies relevant stakeholders and defines communication channels and plans regarding the energy efficiency measures to be introduced in Sabac, Serbia.

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) Performance Requirement 10: Information Disclosure and Stakeholder Engagement European Union (EU) directives and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a living document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

1.2. Objective of the Plan

This Stakeholder Engagement Plan (SEP) is a public document, which sets out the implementing bodies' commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the proposed EBRD investment for the energy efficiency measures.

Public Utility Company "Toplana-Šabac", the Šabac District Heating Company ("DH Company"), is the main implementing body responsible for management of the district heating system and installation of improved energy efficiency measures. The public will be able to access and review this SEP at the DH Company head office in Šabac City, as well as on the [Toplana website](https://toplanasabac.rs/)¹.

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships between the Sabac Residential Buildings Energy Efficiency Project and the local communities will be maintained. This SEP also aims to improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in a timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

The SEP briefly describes public consultation carried out to date, and defines activities that will be implemented by the Project to inform stakeholders about the nature and the potential impacts associated with the energy efficiency measures.

The SEP contains a stakeholder identification table where relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in contact with the contact provided above to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

¹ <https://toplanasabac.rs/>

Specific objectives of the SEP are detailed below:

- Define the Project area;
- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner;
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that any vulnerable groups are identified and consulted;
- Establish clear mechanisms for answering stakeholders' questions, concerns and grievances; and
- Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

1.3. Scope of the Plan

This Stakeholder Engagement Plan covers Toplana operations on the Sabac Residential Building Energy Efficiency Project, including contractor activities. The Plan is constituted of the following sections:

- Chapter 2 – Project Background
- Chapter 3 – Consultation and Disclosure
- Chapter 4 – Existing Stakeholder Engagement and Community Awareness Programmes
- Chapter 5 – Stakeholder Identification
- Chapter 6 – Stakeholder Engagement Programme
- Chapter 7 – Reporting and Grievance Mechanism

2. PROJECT BACKGROUND

The District Heating Company (“Toplana-Šabac”) of the City of Šabac approached the European Bank for Reconstruction and Development (EBRD or the “Bank”) with the request to finance an energy efficiency improvement programme in the City. This is for the implementation of energy efficiency measures in 40 residential buildings (private apartments), including insulation measures and introduction of thermostatic valves and heat allocators.

The 40 buildings have been provisionally selected by Toplana, with some preliminary technical studies completed and a work program for each building available. Buildings with a higher quantity of units were selected in the area of Benska Bare. All selected are also built using similar designs and are connected to the district heating system.

District Heating (DH) in Šabac is solely provided by “Toplana-Šabac” (the “DH company”). Toplana-Šabac is the public utility company for production and distribution of thermal energy, wholly owned by the City. The district heating in Sabac is one of the most advanced systems in Serbia, being one of the first that switched from normative to consumption based tariffs.

The project foresees implementation of a set of measures for increasing the energy efficiency of around 40 selected multi-store residential buildings in Benska Bara district, located in the centre of Šabac. All selected buildings are connected to the central heating system.

The proposed set of the Energy Efficiency (EE) measures includes two groups of actions:

- Thermal insulation of buildings by cladding of exterior walls;
- Control of heating systems in residential units. This includes introduction of thermostatic radiator valves and heat cost allocators in each residential unit:



Figure 1 - Example thermostatic radiator valve



Figure 2 - Example heat cost allocator

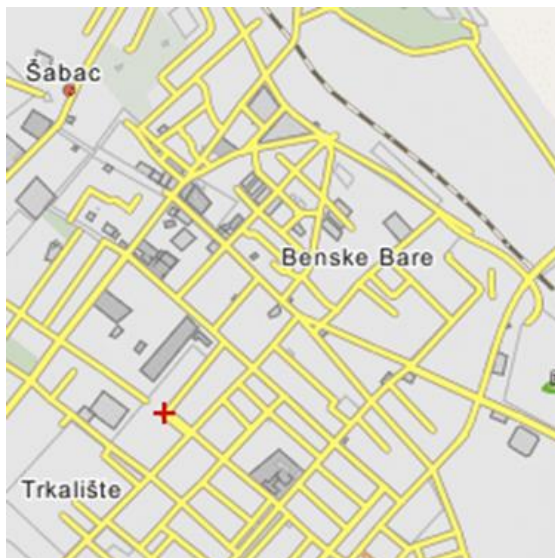
Situated on the right banks of the river Sava in western Serbia within the administrative centre of the Mačva district, Šabac is the economic and cultural centre of Mačva and Podrinje regions.

Appendix II presents the list of buildings where these energy efficiency measures will be introduced under this Project. All of these buildings are located in the area of Benska Bare:

Figure 3 Satellite view of Benska Bare, Šabac



Figure 4 Road map view of Benska Bare, Šabac



The Benska Bare settlement was designed in accordance with the 1964 General Urban Plan, created by Belgrade architects Uglješ Bogunović and Slobodan Janjić. Previous to this, the area was primarily covered by water – a swampy area fed by the neighbouring Sava River. The settlement now covers almost 20 hectares (19.6 ha).

The buildings included in this Project are presented in Appendix II. Further buildings may be included, if suitable funds are available.

3. CONSULTATION AND DISCLOSURE

3.1. National Legislative Requirements

The level of stakeholder engagement and access to information in Serbia relevant for the District Heating Company of Šabac (Toplana) activities is regulated by planning, construction and environmental regulation. Key legislation of the Republic of Serbia, addressing stakeholder engagement, that pertains to the Project includes:

- **The Constitution of the Republic of Serbia**² provides a wide platform for public participation and access to information. It also provides the public with the right to submit requests, petitions and proposals. Article 74 states that everyone has the right to a healthy environment and to timely and complete information about the state of the environment.
- **The Law on Free Access to Information of Public Importance**³ regulates citizens' rights in relation to access to information, held, used and managed by public institutions, sets out the principles and exceptions in the achievement of these rights, as well as the procedures for accessing this information and their protection.
- **The Law on the Protector of Citizens**⁴ establishes an independent state authority which protects the human and minority rights and freedoms of citizens (domestic and foreign physical and legal entities) and controls the work of all administrative authorities.
- **The Law on Waste Management**⁵ prescribes that the issuing of permits for waste management is made public, i.e. that any submitted request for waste management and accompanying documentation, are publicly disclosed and available for comments.

Disclosure of information and organising public hearings in Serbian legislation is regulated through the process of development and adoption of spatial and urban plans for cities, municipalities, settlements, as well as through the environmental impact assessment process.

The laws which regulate these matters are:

- **Planning and Construction Law**⁶
- **Law on the Confirmation of the (Aarhus)⁷ Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters**⁸. The basic principles of this Convention are also supported by other laws and bylaws of the Republic of Serbia, including the Environmental Protection Law⁹, Environmental Impact Assessment Law¹⁰, Strategic Environmental Impact Assessment

² Official Gazette of the RS 98/06

³ Official Gazette of the RS 120/04, 54/07, 104/09 and 36/10

⁴ Official Gazette of the RS 79/05 and 54/07

⁵ Official Gazette of the RS 36/09, 88/10 and 14/16

⁶ Official Gazette of the RS 72/09, 81/09, 64/10 – Constitutional Court Decision (CCD), 24/11, 121/12, 42/13 – CCD, 50/13 – CCD, 54/13 – Constitutional Court Rescript, 98/13 – CCD, 132/14, 145/14

⁷ The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters ("the Aarhus Convention") establishes a number of rights of the public (individuals and their associations) with regard to the environment. The requirements are on the Party that has ratified the Convention.

⁸ Official Gazette of the RS 38/09

⁹ Official Gazette of the RS 135/2004 and 36/2009

¹⁰ Official Gazette of the RS 135/04 and 36/09

Law¹¹ as well as the Regulation on the Procedure for Public Disclosure, Presentation and Public Hearing for the Environmental Impact Assessment¹².

The main activities which will be undertaken by the DH Company before the adoption of the plan / study / document include:

- Through media, inform the public about the details of disclosure of the draft plan/study/document (e.g. where hard copies are available and the dates and times when they can be reviewed) and invite citizens / organisations to submit comments and/or participate in public hearings. Citizens and organisations can request that their comments are responded to in writing;
- Organisation of a public hearing to present and discuss the draft plan/study/document (usually held in the local administration building or some other suitable venue);
- Process comments received from all interested stakeholders and revise/complement the draft plan/study/document accordingly, as well as prepare a report on which comments were not considered and why;
- Deliver the revised plan/study/document and report to the responsible authority which determines whether all comments were adequately considered and processed.

Stakeholder engagement activities on matters concerning the application of expropriation, from the proclamation of public interest to the payment of compensation, are regulated by the Expropriation Law¹³.

3.2. EBRD Requirements

The Project will adhere to EBRD Environmental and Social Policy 2014 and the ten EBRD Performance Requirements (PRs). The Project has been assessed against PRs 1,2,3,4,5, and 10. The EBRD PR 6 (Biodiversity and Natural Resources), PR 7 (Indigenous peoples), PR 8 (Cultural Heritage) and PR 9 (Financial Intermediaries) are not applicable.

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

Table 1: EBRD PR10 Requirements

- | |
|---|
| <ul style="list-style-type: none">■ Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or may have an interest in the Project.■ Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.■ Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.■ Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.■ Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances. |
|---|

¹¹ Official Gazette of the RS 135/2004 and 88/2010

¹² Official Gazette of the RS 69/05

¹³ Official Gazette of the RS 53/95, Official Gazette of the FRY 16/2001 – Federal Constitutional Court Decision and Official Gazette of the RS 20/2009, 55/2013 – CCD 106/2016 – authentic interpretation

3.3. Differences between National and EBRD Requirements

Serbian requirements are to a large extent compatible with IFI requirements, however several gaps exist, as follows:

Table 2 – Differences between Serbian and EBRD requirements in stakeholder engagement and information disclosure

Area of difference	Difference
Development of a Stakeholder Engagement Plan	EBRD require the development of a Stakeholder Engagement Plan, to guide the disclosure of Project documents and consultations with affected people and other stakeholders
Approach to engagement	EBRD require a very proactive approach in obtaining the public opinion and identifying and engaging with all stakeholders, as opposed to a reactive approach, i.e. responding only to comments/questions submitted and issues raised, after they have been submitted/raised.
Vulnerable groups	Attention is required by EBRD in identifying and engaging with a ny identified and existing vulnerable groups.
Consultation during land acquisition	Dedicated consultations with people affected by land acquisition (including land users) are required by EBRD, before and during land acquisition.
Frequency of consultations	Consultations with stakeholders, according to EBRD requirements, should be on-going for the duration of the Project as opposed to consultations concentrated during the permitting period.
Project-specific grievance mechanism	The establishment and implementation of a Project dedicated grievance mechanism (easy to access for all stakeholders, including vulnerable groups) is required by EBRD, in addition to the national administrative grievance procedures.

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

4. EXISTING STAKEHOLDER ENGAGEMENT AND COMMUNITY AWARENESS PROGRAMMES

4.1. Existing engagement by Toplana-Šabac

The DH Company has established channels of communication with stakeholders in place. Details are summarised below.

- *Weekly City Council meetings*

The Mayor, City Council representatives and public company directors (including Toplana) meet weekly on Mondays to discuss their ongoing activities and financial performance. This includes discussing the performance of ongoing infrastructure Projects and any permitting required. The Director of Toplana also meets with the Mayor in one-to-one meetings.

- *Residential building representatives*

Currently, information on potential changes to public utilities, including energy efficiency projects, is disseminated to the residents of the buildings through an elected representative. These representatives are either a volunteer currently within the building, or a professional in housing management. The representatives also share the decisions of the residents to the DH Company, such as their willingness to partake in this energy efficiency project.

These representatives are the primary mode of communication between the DH Company and the residents of multi-story buildings.

- *“Open Door” days*

From May 2018, the DH Company have initiated a service for citizens, to ask questions to the Company, entitled “Open Door”. Twice a week (Tuesdays and Fridays) citizens are able to access a helpdesk in person and ask questions on the functioning of the DH Company and their bills.

- *Media awareness*

The DH Company has previously used advertisements in local newspapers, television and websites to make citizens of Sabac aware of upcoming changes and Projects. A newspaper advertisement is shown below, demonstrating the savings available when investing in heat allocators, thermostatic valves and thermal insulation:

Figure 1 - Toplana price comparison of energy efficiency measures in local newspaper.

		ПРЕ ИЗОЛОВАЊА		ПОСЛЕ ИЗОЛОВАЊА	
2018. GODINA	ДИНАРА	Има изолацију Има ТС вентил	Има изолацију Нема ТС вентил	Нема изолацију Нема ТС вентил	ДИНАРА
		ДИНАРА	ДИНАРА	ДИНАРА	ДИНАРА
Стан у стамбеној згради површине 55 м ² .					
Јануар	3.444,00	7.811,00	10.826,00		
Фебруар	3.663,00	8.117,00	11.297,00		
Март	3.212,00	7.553,00	10.091,00		
Април	2.292,00	3.328,00	4.320,00		
Мај	2.057,00	2.057,00	2.057,00		
Јун	2.057,00	2.057,00	2.057,00		
Јул	2.057,00	2.057,00	2.057,00		
Август	2.057,00	2.057,00	2.057,00		
Септембар	2.057,00	2.057,00	2.057,00		
Октобар	2.779,00	2.791,00	3.186,00		
Новембар	4.156,00	5.133,00	6.383,00		
Децембар	4.904,00	8.410,00	10.500,00		
УКУПНО:	34.735,00	53.428,00	66.888,00		

Рачун за грејање зависи од: квалитета зграде (термо изолација, столарија), техничких могућности за управљање потрошњом енергије (термостатски вентили), начина коришћења и навика станара и стамбене заједнице.
Зависи и од: врсте горива, ефикасности топлотног извора, исправности мреже даљинског грејања.

■ City Council One-Stop Shop

The City Council also runs a “One-Stop Shop” for citizens to ask questions to municipality departments and the city council. Citizens are able to access a helpdesk in person and ask questions on the functioning of local companies and departments, including their bills. Questions and queries are then directed to responsible department of the municipality and their answers are provided over the following week.

There is currently no formalised grievance mechanism in place, however residents are able to voice concerns and issues through their building representative and ongoing “Open Door” days. Residents have also been made aware of this Project through their representatives through preliminary building meetings, however recorded meetings must be carried out (see Section 6) to confirm that all residents have been informed and engaged effectively.

4.2. Planned additional engagement

Further to the measures above, the DH Company are implementing one additional means of community engagement:

■ Academy for renewable energy and energy efficiency

The DH Company stated their interest in creating an academy for renewable energy and energy efficiency. With the hope to begin operating by end of the year, they wish to develop a space in Šabac to show the possibilities of renewable energy in the City, demonstrating examples of good practice. This is an initiative of the City Council, on which Toplana will assist. This academy would represent another means of stakeholder engagement in district heating users.

No formal Project-specific engagement is currently planned.

5. STAKEHOLDER IDENTIFICATION

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) Primary stakeholders are the individuals and groups who are affected directly by the Project; and
- b) Secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by, the Project.

The key stakeholders identified are presented in Table 3.

Table 3: Key Identified Stakeholders and Methods of Engagement

Stakeholder Category	Type	Name	Impact/Influence
Primary	Project Shareholders / Internal Stakeholders	Toplana-Šabac (District Heating Company of Šabac)	This group will directly influence and impact the project through the decision-making process.
	Communities & Businesses	Local businesses and residents (including vulnerable groups i.e. women, pensioners, veterans, and any formal and informal persons and businesses) located in the buildings directly affected by the energy efficiency works within Šabac.	The communities and businesses within the buildings may be affected due to temporary loss of access to garages and certain entrances/exits.
Secondary	Lending Organisation	European Bank for Reconstruction and Development	This organisation will provide the loan to carry out the Project, alongside certain environmental, social and technical requirements.
	Permitting bodies, local governmental agencies	City Council of Šabac	This group will have a direct influence/impact on the project through approving permits, enforcing new regulations and rules.

Building representatives	Elected residents (volunteers) or housing management professionals (paid) managing the utilities with joint accountability of the building.	Disseminate information to the residents of the flats and share decisions of residents to public utilities.
NGOs	At this stage, no NGOs have been active relevant to this project.	
Contractors/Suppliers	Contractors and equipment suppliers on the Šabac Residential Buildings Energy Efficiency Project.	This group will directly participate in the implementation of the Project.
Supervising Engineer	EBRD's Consultant Engineer	Will monitor and provide guidance on the implementation of the environmental management plans of the DH Company and the Contractors

5.1. Vulnerable Groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts.

During the assessments and the preparation of this SEP, it was assessed whether there will be any groups who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or mental disability or other attributes. The assessment identified that there are no vulnerable groups affected by the project who might require different channels of communication.

During Project implementation, the DH Company may identify vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

6.1. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 4 below. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, PR 10 and Serbian national legislation.

The SEP is a live document that will be revisited and updated if necessary on an annual basis to reflect the changes in stakeholder engagement due to project developments and new stakeholders if any. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 4 are not exclusive and Toplana-Šabac may choose to disclose more information upon request by stakeholders.

The DH Company is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected people. All related Project documents and communication related to the Project will be available and undertaken in English and Serbian languages.

6.2. Stakeholder Engagement Programme

The envisaged programme of public consultation and disclosure activities are presented below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the project life cycle.

Contact information for this project is provided below:

Public Utility Company "Toplana-Šabac", the Sabac District Heating Company
Slobodan Jerotic, CEO
Address - Djure Jakšića 1, Šabac, Serbia
Telephone - +381(0)15342975
Email - slobodan.jerotic@sabac.org

The DH Company will collate any comments and feedback associated with this project and will document these. Further, minutes will be taken at all meetings (formal and informal) and will include a signed attendance register.

All comments received will be reviewed in accordance with the commitments made under the best international practise presented within the 'EBRD Requirements' section provided in Section 3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Future Stakeholder Engagement Programme is detailed Table 3 below:

Table 4: Future Stakeholder Engagement Programme

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
<ul style="list-style-type: none"> ▪ Representatives of the affected buildings (volunteer or professional) 	<ul style="list-style-type: none"> ▪ Meetings with Toplana-Sabac 	<ul style="list-style-type: none"> ▪ Illustrating images of new energy efficiency measures to be introduced and energy savings statistics ▪ Schedule of works for each specific building ▪ Temporary access limitations and measures being undertaken by contractor to limit disturbances 	<ul style="list-style-type: none"> ▪ Before construction / during construction / during operation
<ul style="list-style-type: none"> ▪ Residents of the affected buildings 	<ul style="list-style-type: none"> ▪ Meetings with building representative to disclose Project information ▪ Continued use of Toplana-Sabac “Open Door Days” 	<ul style="list-style-type: none"> ▪ Images showing examples of new energy efficiency measures to be introduced and energy savings statistics ▪ Schedule of works for each specific building ▪ Temporary access limitations and measures being undertaken by contractor to limit disturbances 	<ul style="list-style-type: none"> ▪ Before construction / during construction / during operation
<ul style="list-style-type: none"> ▪ Business owners of the affected buildings 	<ul style="list-style-type: none"> ▪ Affected business owner meetings with Toplana-Sabac ▪ Meetings with building representative to disclose Project information ▪ Continued use of Toplana-Sabac “Open Door Days” 	<ul style="list-style-type: none"> ▪ Images of new energy efficiency measures to be introduced and energy savings statistics ▪ Schedule of works for each specific building ▪ Temporary access limitations and measures being undertaken by contractor to limit disturbances to businesses during operating hours 	<ul style="list-style-type: none"> ▪ Before construction / during construction / during operation
<ul style="list-style-type: none"> ▪ Local emergency services – 	<ul style="list-style-type: none"> ▪ Correspondence followed by site visits 	<ul style="list-style-type: none"> ▪ Details of the design, including the Construction Phase 	<ul style="list-style-type: none"> ▪ Before construction /

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
specifically the fire department		Environmental, Health and Safety Management Plan, emergency response plan and the fire safety report developed by design engineer for review	during construction
■ Council of the City of Sabac	■ Weekly Meetings	■ Updates on the Project implementation and monitoring of works.	■ Before construction / during construction

In summary of the table, three key communication methods for this assignment are described below:

Building representative meetings

- A list of the representatives for all selected buildings must be finalised before the beginning of construction, identifying which representatives are residents or hired professionals. These individuals will be listed as an appendix to the SEP, and will continue to be the main communication between residents and the DH Company. All professionals hired to undertake this role must be in possession of a signed agreement with all households they represent.
- The Project measures and activities will be explained through these representatives. Representatives should meet with the DH Company, and separately with the residents, on a weekly basis. Formal minutes and attendance registers must be taken during these meetings.
- If the buildings residents are willing to commence with Project, written agreements must be ratified by all residents.
- As part of these meetings, residents should be made aware that disability access to the buildings will be maintained throughout the course of the construction period. Further, if any issues are identified from vulnerable groups, these must be passed on to the DH Company for discussion and resolution.

Business owner consultation

- The owners of the businesses within the residential buildings are consulted separately to ensure that the planned construction and scaffolding does not hinder the specific business activity (e.g. convenience store).

“Open Door” days

- The Open-Door days will be maintained by Toplana-Sabac so residents can directly access representatives of the DH Company, and are able to ask Project-specific questions.

Please note that the interaction between Toplana-Sabac and the contractors and Supervising Engineer will be stipulated in their scope of works, included in their individual contracts. This will involve regular, daily communication between all three parties.

7. REPORTING AND GRIEVANCE MECHANISM

7.1. Monitoring, Reporting and Feedback Mechanisms

The DH Company will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. A complaint and suggestion box will be available for stakeholders participating in public consultation meetings and will also be available online or by contacting DH Company using the details within this SEP.

Any complaints and suggestions raised will be registered in the log for complaints and suggestions. These will then be sent to senior management for the further consideration.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, the DH Company will confirm to EBRD that the arrangements are in place and operating before construction begins. This will include the sharing of documentation on public hearings, information disclosure and any other form of stakeholder engagement undertaken as part of the SEP. In line with Toplana's submission of the Annual Environmental and Social Report, EBRD will also annually audit the SEP implementation (after the energy efficiency measures have been implemented).

7.2. Grievance Mechanism

Any comments or concerns can be brought to the attention of the company verbally or in writing or by filling in a grievance form. The grievance form will be made available on the company website, and at the 40 residential buildings once construction has commenced, alongside a description of the grievance mechanism.

7.3. Grievance Resolution

Grievances can be submitted either on site or on-line through a dedicated form. If grievances are submitted on site, they can either be submitted directly to the building representatives who will pass them on to Toplana-Sabac, or forms (identical to the on-line forms) can be submitted in a complaints box in the Toplana-Sabac office that will be checked daily. Forms will be available on site and on line and include the following:

- Name – or option to submit anonymously
- Contact information – or option to submit anonymously
- Preferred communication language
- Description of grievance
- Date of grievance
- Proposed resolution

It is the responsibility of the Director to ensure that all grievances submitted on site are logged in the on-line database – grievances submitted on-line are logged on the database automatically. This result in the grievance mechanism to be implemented.

All grievances will be:

- Acknowledged immediately – if lodged in person;
- Acknowledged within 3 working days if received through a letter or online;

- Logged in the on-line data base (including the, Name and contact details (if not anonymous, the date received, the details of the complaint, who is responsible for resolution, the actions taken, and the date resolved);
- Responded to no later than within 30 working days;
- In case of anonymous complaints, the printed response will be posted at the local government information boards physically and online, so as the complaining party can approach and review the feedback.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

7.4. Roles and Responsibilities

Slobodan Jerotic, the DH Company Director, will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments / complaints, and responding to any such comments and complaints. Depending on the nature of a comment / complaint, some comments or complaints will be provided to the appropriate person in the company for a response.

Name: **Slobodan Jerotic**

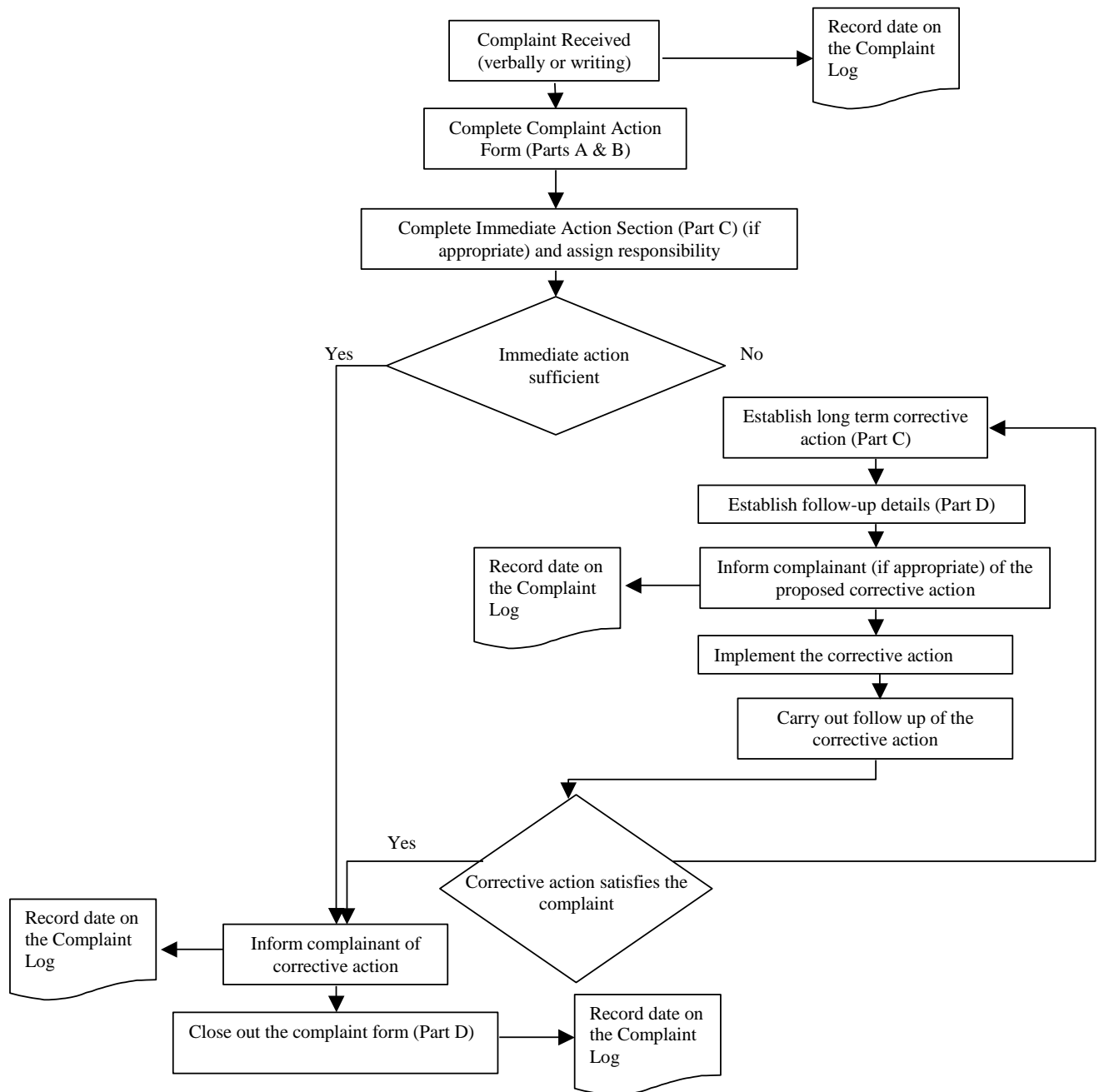
Title: **Director, Toplana-Sabac**

Telephone: **+381(0)15342975**

E-mail: slobodan.jerotic@sabac.org

The Supervising Engineer and contractors will assist with this Stakeholder Engagement Plan process by elevating complaints to the DH Company for their redressal. Any complaints received by the SE or contractors will be noted on site and passed on to Slobodan Jerotic. This will be stipulated via the tender documentation and the Code of Conduct for the SE and contractors.

APPENDIX I – Complaint Procedure and Grievance Form



Public Grievance Form

Reference No:	
Full Name	
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____
Language Please mark your preferred language for communication	<input type="checkbox"/> Uzbek <input type="checkbox"/> Russian <input type="checkbox"/> Other
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

Public Utility Company "Toplana-Šabac", the Sabac District Heating Company
 Slobodan Jerotic, CEO
 Address - Djure Jakšića 1, Šabac, Serbia
 Telephone - +381(0)15342975
 Email - slobodan.jerotic@sabac.org

APPENDIX II – List of Buildings

Building address	Construction year	Height of building	Floors	Number of units	Total surface of external walls
Dr Andre Jovanovića br. 2	1971	18.84	7	69	2,223.61
Dr Andre Jovanovića br. 4	1971	18.84	7	69	2,223.61
Dr Andre Jovanovića br. 6	1971	18.84	7	69	2,223.61
Car Dušana br. 48	1990	21.80	8	32	1,774.52
Kralja Dragutina br. 1, 3 i 5	1980	30.54	10, 9, 8	87	5,298.91
Kralja Dragutina br. 4 i 6	1974	18.60	7	42	2,517.00
Kralja Dragutina br. 7, 9 i 11	1975	18.42	7	78	2,716.36
Kneza Miloša br. 1, 3 i 5	1980	30.54	10, 9, 8	95	5,298.91
Kneza Miloša br. 4	1970	18.40	7	49	2,819.00
Kneza Miloša br. 6, 8 i 10	1972	30.54	10, 9, 8	81	5,298.91
Kneza Lazara br. 2	1977	37.10	14	94	3,797.56
Kneza Lazara br. 3 i 5	1973	20.56	7	66	2,577.00
Kneza Lazara br. 4	1974	25.30	9	93	5,075.78
Kneza Lazara br. 6	1975	37.45	14	74	4,367.96
Kneza Lazara br. 7 i 9 Kralja Dragutina br. 2	1972	19.93	7	71	2,705.02
Kneza Lazara br. 8	1975	37.45	14	74	4,367.96
Kneza Lazara br. 11 i 13	1977	41.13	15	117	6,411.02
Kralja Petra I br. 2	1974	21.41	7	24	2,270.78
Kralja Petra I br. 5 i 7	1975	27.70	9	60	2,970.12
Kralja Petra I br. 8	1974	26.90	9	40	2,326.11
Kralja Petra I br. 9	1975	27.70	9	60	1,435.00
Kralja Petra I br. 10	1974	41.10	15	63	3,986.10
Kralja Petra I br. 14	1974	26.90	9	40	2,375.34
Kralja Petra I br. 16 i 18	1974	21.41	7	48	2,763.85
Kraljice Marije br. 1	1989	16.70	5	9	675.63
Kraljice Marije br. 2	1999	16.80	7	30	1,809.00
Kraljice Marije br. 13	1989	18.01	5	34	1,458.23