

Stakeholder Engagement Plan

Strategic Gas Infrastructure Component

Serbia Gas Sector Development Multi-Phase Programmatic Approach (SGSD MPA) — Phase 1

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List of Abbreviations

Abbreviation	Term
CERC	Contingent Emergency Response Component
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS2	Environmental and Social Standard 2 on Labour and Working Conditions
ESS5	Environmental and Social Standard 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
ESS10	Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure
GM	Grievance Mechanism
JP	Javno Preduzeće (Public Enterprise)
MCTI	Ministry of Construction, Transport and Infrastructure
MoME	Ministry of Mining and Energy
MPA	Multi-Phase Programmatic Approach
PIU	Project Implementation Unit
RGA	Republic Geodetic Authority
RPF	Resettlement Policy Framework
SEA	Strategic Environmental Assessment
SEP	Stakeholder Engagement Plan
SGSDP	Serbia Gas Sector Development Program
SMS	Short Message Service

1 Introduction/Project Description

Serbia's gas sector faces a combination of infrastructure, supply diversification and institutional challenges. The country remains highly dependent on imported gas, while limitations in the existing inland transmission network constrain the efficient use of diversified supply routes and future interconnections. Further investment is also needed to strengthen gas storage capacity, transmission resilience, sector governance, regulatory development and the institutional capacity required to prepare and implement major infrastructure investments in line with national priorities and international standards.

The proposed Serbia Gas Sector Development Program (P516639) (the Program) aims to improve the security, reliability, and resilience of gas supply in Serbia, while supporting the country's energy transition and strategic role in regional gas transit. The Program is being prepared by the Republic of Serbia, through the Ministry of Mining and Energy (MoME), under a World Bank-supported Multi-Phase Programmatic Approach (MPA).

The Program consists of three phases.

Phase 1 is the Serbia – Strategic Gas Infrastructure and Institutional Strengthening Project (P516640) (the Project). It is intended both to address an immediate bottleneck in Serbia's inland transmission system and to establish the institutional and technical foundations for the broader Program.

Phase 2 is expected to continue development of the central inland transmission corridor through construction of the approximately 80 km Pojate–Veliko Orašje pipeline section and a new gas compressor station, currently considered at Trupale or Batočina and subject to further technical and hydraulic assessment. Phase 2 is also expected to continue institutional strengthening, sector reforms, project implementation support, and preparation of subsequent investments initiated under Phase 1.

Phase 3 represents a geographically distinct northern transmission and storage development concept. Current Program documentation envisages: (i) construction of an approximately 150 km new inland gas pipeline from the Mokrin area to Belgrade South, intended to link with the future Romania–Serbia interconnector; (ii) development of the Tilva underground gas storage facility; and (iii) construction of an approximately 30 km access pipeline connecting the storage facility to the inland transmission corridor. Current Program preparation materials also indicate potential interfaces with major existing and planned gas infrastructure in northern Serbia, including infrastructure nodes in the Banatski Dvor, Itebej, and Pančevo areas. The precise routing, relationship between these infrastructure nodes, location of individual facilities, and affected local self-government units remain to be confirmed through feasibility studies, route selection, spatial planning, technical design and environmental and social assessment.

Phase 1 – Strategic Gas Infrastructure and Institutional Strengthening Project (P516640) comprises three main components.

Component 1 will finance construction of the approximately 62 km Trupale–Pojate high-pressure gas pipeline section, forming the first subsection of the broader Trupale–Veliko Orašje inland gas transmission corridor.

Component 2 will support institutional strengthening and technical assistance, including the establishment and operation of a dedicated Project Implementation Unit (PIU) within MoME,

institutional strengthening and capacity building for Gas Infrastruktura, Transportgas Srbija, Srbijagas, and AERS; implementation of sector reforms to improve operational efficiency, financial sustainability, and governance; and preparation of technical, engineering, procurement, environmental and social studies required for Phase 1 and subsequent phases.

Component 3 will establish a Contingent Emergency Response Component (CERC).

A distinction should be made between the geographic scope of the formally initiated national spatial planning process and the infrastructure investments currently included in the MPA Program. The Spatial Plan for the Special Purpose Area of the Bidirectional Main Gas Pipeline Niš – Batajnica – Horgoš – Hungarian Border with elements of detailed regulation covers a substantially broader national corridor. Based on the current Program scope, the Trupale–Pojate and Pojate–Veliko Orašje sections of this broader corridor are included as infrastructure investments under Phases 1 and 2. The continuation of the spatial planning corridor beyond Veliko Orašje towards Batajnica, Horgoš and the Hungarian border is not currently identified as an MPA-financed investment and therefore does not form part of the Program's investment scope, although it may remain relevant as broader planning, institutional, or cumulative context. Phase 3 follows a separate northern transmission and storage development concept.

According to the clarification provided by MoME, the Working Group referred to in the available Project preparation materials was envisaged as a temporary coordination mechanism to support the preparation and finalisation of the Scope of Work for the relevant technical, environmental, and social studies. It was not intended to serve as a standing body for the review or supervision of the spatial planning process, or for agreement on the final pipeline route.

The geographic and stakeholder contexts differ significantly across the three phases.

The Phase 1 Trupale–Pojate section is located in southern and central Serbia and is expected to pass through the territory of the City of Niš and the municipalities of Aleksinac, Ražanj and Čićevac. The corridor is predominantly rural and agricultural, with dispersed settlements, cultivated land, river and infrastructure crossings and areas where previous gas infrastructure and associated land acquisition, servitude or temporary occupation arrangements may exist. The route is expected to largely follow the existing pipeline corridor, with possible deviations to address technical constraints and environmental or social sensitivities.

Under Phase 2, the corridor will continue northwards from Pojate towards Veliko Orašje. Based on the current Program and spatial planning framework, the wider area is expected to include parts of the territories of Čićevac, Varvarin, Paraćin, Čuprija, Jagodina, Svilajnac and Velika Plana, subject to confirmation of the final alignment and the precise Phase 2 area of influence. Parts of the Phase 2 area may present a more complex stakeholder environment because of higher settlement density, more intensive commercial and industrial activity, major transport and infrastructure interfaces and more intensively used agricultural land.

Given the current level of Program preparation, the Phase 3 area of influence remains to be defined but may extend across substantially different geographic and socio-economic settings. In the wider Belgrade South context, depending on the final alignment, future route selection may encounter dense urban and peri-urban development, major transport and utility infrastructure and concentrations of residential, commercial and industrial activity. Within the potential corridor through Vojvodina and the Banat area, stakeholder engagement may be particularly relevant in relation to extensive agricultural land use, agricultural livelihoods, temporary occupation, crop losses, drainage and irrigation systems, access to

parcels and restrictions associated with pipeline protection zones. The location of major existing and planned gas infrastructure may also influence route selection and the ultimate area of influence.

The Program and the Phase 1 Project are being prepared under the World Bank Environmental and Social Framework (ESF). This Stakeholder Engagement Plan (SEP) provides the overarching framework for stakeholder engagement across the Program, with a more detailed focus at the current stage on Phase 1. The SEP is a living document and will be updated as needed to reflect the evolving preparation and implementation of the Program and its subsequent phases. This version of the SEP reflects stakeholder engagement undertaken during Phase 1 scoping process and provides the framework for engagement during the forthcoming main Environmental and Social Impact Assessment (ESIA) phase and related Project preparation activities.

2 Objective/Description of SEP

The overall objective of this SEP is to establish a systematic, inclusive and transparent framework for stakeholder engagement across the Serbia Gas Sector Development Program (the Program) and, in greater detail at the current stage, for the Phase 1 Strategic Gas Infrastructure and Institutional Strengthening Project (the Project). The SEP defines the principles, institutional arrangements and methods for timely information disclosure, meaningful consultation, ongoing communication with stakeholders, engagement with disadvantaged or vulnerable individuals and groups, grievance management, monitoring and reporting throughout the relevant stages of Program preparation and implementation.

The SEP outlines how the Ministry of Mining and Energy (MoME), including through the Project Implementation Unit (PIU) to be established under Phase 1, will communicate with affected parties, other interested parties and disadvantaged or vulnerable individuals and groups. It also provides the framework through which stakeholders can raise questions and concerns, provide feedback, submit grievances or complaints and receive responses concerning the Project and, as relevant, subsequent Program activities. Particular emphasis is placed on identifying and addressing barriers that may prevent disadvantaged or vulnerable stakeholders from accessing information, participating in consultations or making effective use of grievance channels.

The SEP is prepared at Program level because the Serbia Gas Sector Development Program is structured as a Multi-Phase Programmatic Approach comprising three interrelated phases with different levels of technical, environmental and social preparation. While individual investments will have distinct geographic footprints, stakeholder groups, environmental and social risks and implementation arrangements, the phases share sector-level objectives and important institutional, regulatory, spatial planning and environmental and social interfaces, as well as a need for consistent stakeholder engagement principles.

This is particularly relevant for Phase 1 and Phase 2, which are linked to the formally initiated spatial planning process for the Bidirectional Main Gas Pipeline Niš – Batajnica – Horgoš – Hungarian Border. The competent authorities, institutions, bodies exercising public authority and other entities participating in or providing inputs to the spatial planning process will form an important part of the Program's stakeholder landscape and will need to be appropriately reflected in stakeholder identification, information exchange and engagement arrangements. A Program-level SEP therefore provides a common framework for stakeholder identification, information disclosure, consultation, inclusion, grievance management and monitoring across the Program, while allowing these arrangements to be progressively refined for individual phases and investments.

A specific feature of the Phase 1 Project is that the ESIA process is being carried out in parallel with the formally initiated national spatial planning procedure for the Spatial Plan for the Special Purpose Area of the Bidirectional Main Gas Pipeline Niš – Batajnica – Horgoš – Hungarian Border with elements of detailed regulation. The Spatial Plan and the related planning procedure therefore constitute important reference points for the SEP, ESIA and Resettlement Policy Framework (RPF)¹. A

¹ Decision on the Preparation of the Spatial Plan for the Special Purpose Area of the Bidirectional Main Gas Pipeline Niš – Batajnica – Horgoš – Hungarian Border with elements of detailed regulation, Official Gazette of the Republic of Serbia No. 4/2024

Strategic Environmental Assessment (SEA) procedure for the Spatial Plan has also been initiated through a separate decision on the preparation of the SEA².

Coordination between the ESIA process, the SEP and the national spatial planning procedure is therefore particularly important. The spatial planning process is expected to play a central role in defining the pipeline route, infrastructure corridor, protection zones, above-ground facilities, access arrangements, public-purpose areas, infrastructure interfaces and potential land acquisition requirements or restrictions on land use. These decisions may directly influence the identification and assessment of environmental and social risks and impacts, the design of mitigation measures and the scope of future land acquisition and resettlement planning.

Accordingly, the stakeholder identification framework under this SEP will encompass relevant public authorities, institutions, bodies exercising public authority and other entities involved in the preparation of the Spatial Plan and related planning procedures. This includes, as relevant, institutions issuing planning and technical conditions, environmental and cultural heritage protection requirements, water conditions, infrastructure conditions, safety requirements, cadastral and geodetic inputs and other sector-specific requirements. Their inputs may directly affect Project design, route selection, mitigation measures, protection zones, access arrangements, land acquisition planning and the identification and management of environmental and social risks.

The statutory spatial planning procedure, including early public insight, public insight into the draft plan and the consideration of comments submitted during public consultation, provides an important entry point for stakeholder engagement. However, these statutory processes do not substitute for stakeholder engagement consistent with ESS10. The SEP will therefore build on and coordinate with the national spatial planning procedure while providing for continuous, targeted and accessible engagement with directly affected persons, local communities, disadvantaged or vulnerable individuals and groups and other relevant stakeholders throughout Project preparation and implementation.

At the same time, the degree of detail necessarily varies across the three phases. Phase 1 activities, particularly the Trupale–Pojate pipeline section and the associated institutional strengthening, technical assistance and environmental and social assessment activities, are currently at a more advanced stage of preparation. This version of the SEP therefore reflects stakeholder engagement undertaken during Phase 1 scoping and focuses on the forthcoming main ESIA phase, route planning and refinement and future land acquisition and resettlement planning. For Phases 2 and 3, the SEP establishes overarching engagement principles, institutional arrangements and preliminary stakeholder categories that will be further developed as feasibility studies, route selection, spatial planning, technical design and environmental and social assessments advance.

The Program-level SEP will provide the framework for future phase-specific and site-specific stakeholder engagement arrangements and, where required, Stakeholder Engagement Plans for individual investments and locations. These instruments will identify the precise affected communities, landowners and land users, institutions, businesses, infrastructure operators, vulnerable groups and other stakeholders relevant to each investment and will define locally appropriate disclosure channels, consultation methods, grievance arrangements and monitoring measures. The Program-level SEP will

² Decision on the Preparation of the Strategic Environmental Assessment of the Spatial Plan for the Special Purpose Area of the Bidirectional Main Gas Pipeline Niš–Batajnica–Horgoš–Hungarian Border, with detailed-regulation elements, Official Gazette of the Republic of Serbia, No. 69/2023.

therefore be updated as additional information becomes available and as the Program progresses through preparation, appraisal, implementation and subsequent phases.

The PIU to be established and operationalised within MoME under Phase 1 is expected to play a central role in implementing and updating the SEP once operational. Its responsibilities are expected to include coordinating stakeholder engagement activities, overseeing future phase-specific and site-specific engagement arrangements, coordinating the Project grievance mechanism, consolidating consultation and stakeholder feedback records, monitoring stakeholder engagement performance and reporting on relevant environmental and social commitments. As further described in Section 5, these functions will be progressively developed as the PIU becomes operational and will continue to require support from the ESIA Consultant and other environmental, social and technical specialists where appropriate. The SEP should therefore be understood not only as an instrument for compliance with Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure (ESS10), but also as a practical implementation and institutional capacity-building tool for MoME and the PIU.

For the purposes of the Program, stakeholder engagement will be guided by the principles of timely and accessible information disclosure, meaningful consultation, inclusiveness, proportionality to environmental and social risks and impacts, cultural appropriateness, non-discrimination and responsiveness to stakeholder feedback. Engagement will seek to begin sufficiently early to inform project preparation and decision-making and will continue throughout the relevant stages of Project and Program preparation and implementation. Attention will be given to stakeholders who may face barriers to participation because of geographic isolation, limited access to information, socio-economic disadvantage, disability, age, gender-related constraints or other circumstances that may increase the risk of exclusion.

The SEP is a living document and will be updated as needed to reflect changes in Project design, Program phases, stakeholder groups, environmental and social risks and impacts, lessons from consultations, grievances received and the findings of scoping, ESIA and other relevant environmental and social studies. Updates will also take account of stakeholder feedback and the evolving relationship between Program activities, spatial planning procedures and other national consultation and disclosure processes. Once updated, the SEP will be redisclosed through relevant Project communication channels, including the MoME/PIU website and other locally appropriate channels, as needed, so that stakeholders and the wider public have access to the latest version and remain informed of material changes.

3 Stakeholder identification and analysis per project component

Stakeholder identification has been, and will continue to be, carried out with the objective of establishing which individuals, communities, organisations and institutions may be directly or indirectly affected by Program activities, or may have an interest in, responsibility for, knowledge relevant to, or influence on Program preparation and implementation. Given the different levels of preparation of the three Program phases, stakeholder identification is necessarily iterative and will be progressively refined as feasibility studies, route selection, spatial planning, technical design, environmental and social assessment and land acquisition planning advance.

At the current stage, particular attention is given to stakeholders relevant to the Phase 1 Project and to engagement required to build on the completed scoping work and support the main ESIA, route planning and refinement and future land acquisition and resettlement planning. At Program level, preliminary stakeholder categories are also identified for Phases 2 and 3, recognising that the precise geographic footprints and affected parties of these investments remain subject to further studies and design development.

3.1 Methodology

For the Program, stakeholders have been identified using a multi-level and iterative approach combining: (i) review of available Program and Project preparation documents; (ii) review of the current and proposed infrastructure concepts for the three Program phases; (iii) analysis of the formally initiated spatial planning process and related institutional responsibilities; (iv) preliminary review of available route information, cadastral areas and local administrative territories; (v) review of the environmental, social, land-use and livelihood characteristics of potentially affected areas; (vi) field visits and preliminary consultations with relevant local authorities and other stakeholders; and (vii) consideration of existing gas infrastructure, previous land acquisition, easement, temporary occupation and construction experience where this may inform the identification of risks, stakeholder concerns and engagement needs.

Stakeholder identification is undertaken at three interconnected levels:

- **Program level**, covering institutions, sector actors and other stakeholders relevant across the Multi-Phase Programmatic Approach, including those involved in energy policy, gas sector governance, spatial planning, environmental assessment, land administration, infrastructure coordination and implementation of environmental and social requirements;
- **phase and investment level**, reflecting the distinct geographic footprints, technical characteristics, environmental and social risks and institutional interfaces of Phases 1, 2 and 3; and
- **local and site-specific level**, focusing on communities, landowners, land users, businesses, infrastructure operators and other persons or entities that may be directly affected by route alternatives, construction footprints, above-ground facilities, access arrangements, protection zones, temporary occupation or other Project-related impacts.

These stakeholders include affected parties, as described in Section 3.2, other interested parties, as described in Section 3.3, and disadvantaged or vulnerable individuals or groups, as described in Section 3.4.

3.2 Affected parties

Affected parties include individuals, households, communities, businesses and other persons or entities that may experience direct environmental or social impacts from Program activities. At the current stage, the following preliminary categories have been identified.

At the current stage, affected parties can be identified with greatest specificity for Component 1 of the Phase 1 Project. For later phases and investments, the categories below will be progressively refined once routes, sites and areas of influence are more clearly defined.

Component 1 – Trupale–Pojata high-pressure gas pipeline

Potentially affected parties include:

- **owners of land and other immovable property within or adjacent to the proposed pipeline corridor**, including persons whose land may be subject to permanent acquisition, easement or other land-use rights or restrictions, protection-zone restrictions, temporary occupation, access requirements or other limitations associated with Project construction and operation;
- **actual land users whose use may differ from registered ownership records**, including tenants, lessees, sharecroppers, informal users, persons cultivating land belonging to family members or other persons, and users of state, municipal or other publicly owned land;
- **owners and users of agricultural land**, including farmers, orchard owners, livestock keepers and other agricultural producers who may be affected by temporary loss of access, crop losses, disturbance of cultivation cycles, soil compaction, disruption of drainage or irrigation, restrictions on planting or future land use, or delays in restoring land after works;
- **persons and households whose livelihoods depend wholly or partly on affected land or natural resources**, including those whose income may be affected even where they do not hold formally registered ownership rights;
- **owners, occupants and users of residential, commercial, agricultural and auxiliary buildings located within or close to the area of influence**, particularly where route refinement, construction access, safety distances, vibration, noise, dust, traffic or other temporary impacts may be relevant;
- **communities and residents in settlements and cadastral areas crossed by or located in proximity to the proposed corridor**, including communities within the territory of the City of Niš and the municipalities of Aleksinac, Ražanj and Čičevac, with the precise affected settlements and cadastral municipalities to be confirmed and updated as route refinement progresses;
- **persons using local roads, field tracks and other access routes that may be temporarily disrupted or subject to increased construction traffic**, including residents, farmers, businesses and service providers;
- **businesses and economic operators located within or close to the construction corridor or dependent on affected access routes**, where activities may be disrupted by temporary occupation, construction traffic, access restrictions or other Project-related impacts;
- **users of water resources, drainage and irrigation infrastructure and other locally important shared resources** where crossings or construction activities may temporarily affect access, functioning or use;
- **persons or entities affected by construction camps, storage areas, temporary access roads, laydown areas, spoil management areas or other ancillary facilities**, once their locations are identified;
- **owners and users of land affected by above-ground facilities and associated access arrangements**, once the precise location and footprint of such facilities are confirmed;

- **persons who were previously affected by land acquisition, easement or other land-use rights or restrictions, or temporary occupation for existing gas infrastructure in the same or a nearby corridor**, where earlier arrangements, unresolved concerns or prior experience may influence current Project impacts, expectations, perceptions or willingness to engage;
- **owners and users of forests and forest land**, including public or private forest owners, forest management organisations, timber producers and persons collecting forest products, where forest clearance, access restrictions, temporary occupation or other Project-related impacts may occur;
- **owners, operators and users of licensed mineral extraction sites, exploration areas, quarries, borrow pits or other resource-use areas**, where the pipeline corridor or associated facilities overlap with, are adjacent to, or may impose restrictions on existing or planned operations, subject to confirmation through route refinement and ESIA studies and
- **host communities and local residents potentially affected by temporary labour influx, increased traffic, community health and safety risks, or pressure on local services**, to the extent such risks are identified through the ESIA process.

The precise composition of affected parties will be refined as route alternatives are assessed and the preferred alignment becomes more clearly defined. Particular attention will be given to identifying both legally recognised rights holders and persons who use or depend on affected land without formally registered rights, in accordance with applicable Project environmental and social requirements, including ESS5, the RPF and subsequent land acquisition and resettlement planning.

Component 2 – Institutional strengthening and technical assistance

Component 2 is not expected to generate the same type of direct physical footprint as pipeline construction. Nevertheless, depending on the specific activities undertaken, potentially affected parties may include:

- **individuals, communities and land users who may be affected by studies, investigations, surveys, route assessment, geotechnical work or other preparatory activities** supported under Component 2;
- **landowners and land users who may be contacted or whose land may need to be accessed for surveys, investigations or technical studies**, including where such activities are temporary and do not require permanent land acquisition;
- **communities and stakeholders affected by future investments whose preparation is supported under Phase 1**, particularly where feasibility studies, route selection, ESIA processes or resettlement planning for Phases 2 and 3 involve consultation, surveys or early design decisions with potential implications for land use or livelihoods.

Because Component 2 includes preparation of studies for subsequent Program phases, identification of affected parties under this component will be closely linked to the progressive stakeholder mapping undertaken for Phases 2 and 3.

Component 3 – Contingent Emergency Response Component

The CERC will only be activated in response to an eligible emergency. The nature, location and scale of activities, and therefore the affected parties, cannot be identified in advance. If activated, stakeholder identification will be undertaken rapidly and proportionately to the emergency context and will include persons and communities directly affected by both the emergency and the response activities financed

under the CERC. Relevant stakeholder engagement arrangements will be applied in accordance with the CERC environmental and social procedures and the requirements of the ESF.

Preliminary affected-party categories for Phases 2 and 3

For Phase 2, affected parties are expected to include categories broadly similar to those identified for the Phase 1 pipeline, including landowners, actual land users, agricultural producers, businesses, communities close to the corridor, persons affected by access arrangements and temporary occupation, and users of infrastructure or shared resources crossed by the pipeline. The stakeholder environment may be more complex in some locations because of denser settlement patterns, intensive agricultural production, commercial and industrial development and interfaces with major transport and utility infrastructure.

For Phase 3, preliminary affected-party categories may include agricultural landowners and users, rural and peri-urban communities, businesses, owners and users of land required for pipeline and storage-related infrastructure, persons affected by access and protection-zone restrictions, and communities close to above-ground facilities or storage infrastructure. Depending on the final route and infrastructure configuration, the stakeholder context may range from extensive agricultural areas in Vojvodina and Banat to more densely developed urban and peri-urban areas in the wider Belgrade South context. These categories will be revised once the technical concept and area of influence are further defined.

3.3 Other interested parties

The preliminary stakeholder mapping reflects the Program-level character of this SEP and the different levels of maturity of the proposed investments. Stakeholders have therefore been identified at: (i) Program level, covering institutions and other actors with responsibilities or interests relevant to the overall Serbia Gas Sector Development Program; (ii) phase and investment level, reflecting the distinct technical and institutional contexts of Phases 1, 2 and 3; and (iii) local and site-specific level, with more detailed identification for Phase 1 (Trupale–Pojate), where route information and institutional responsibilities are currently more developed.

The mapping also reflects the fact that spatial planning for the wider Niš–Batajnica–Horgoš pipeline corridor is expected to proceed in parallel with the technical preparation of relevant Program investments, particularly Phases 1 and 2. Municipalities and cities participating in or providing inputs to this spatial planning process are therefore considered stakeholders from an early stage, even where the final alignment of individual Program investments has not yet been confirmed. Depending on their statutory responsibilities, their administrations, planning bodies and technical services may participate in the preparation of spatial planning documentation, provide cadastral, property, infrastructure and planning data, issue conditions and opinions, participate in early public insight and public insight procedures, coordinate interfaces with existing and planned infrastructure, and later support land acquisition and expropriation-related processes.

Accordingly, stakeholder identification is not limited to the currently more advanced Phase 1 corridor and will be progressively refined as spatial planning, route development, technical design, environmental and social assessment, and implementation arrangements advance.

The principal stakeholder groups identified at this stage include the following.

Project-level institutions and implementation bodies

A key institutional stakeholder is the Ministry of Mining and Energy (MoME) as the responsible ministry and Project counterpart. Within MoME, particular importance attaches to the Project Implementation Unit (PIU) envisaged in the Project documentation. Once operational, the PIU is expected to progressively assume a central role in Project coordination and in overseeing implementation of applicable environmental and social requirements, including commitments under this SEP. Its functions are expected to include coordination with relevant ministries, public authorities, local self-governments, Project entities and other implementing actors; coordination and oversight of stakeholder engagement activities; consolidation of Project-level information and reporting; and coordination and oversight of grievance management and other environmental and social implementation arrangements. During Project preparation and the main ESIA phase, these functions will continue to require substantial support from the ESIA Consultant and other relevant specialists, as further described in Section 5.

Other key Project-level stakeholders include JP Srbijagas, Transportgas Srbija, Gas Infrastruktura and other public or corporate entities that may have responsibilities related to the planning, development, ownership, construction, operation or maintenance of individual pipeline sections or associated facilities. Their precise roles may differ by phase and will be further confirmed as institutional and implementation arrangements are finalised. The entity formally designated as beneficiary of expropriation for each relevant investment will have a particularly important role in future land acquisition and resettlement processes, as further described below.

Particular attention will be required once the beneficiary of expropriation is formally confirmed for each relevant section and associated facility. Where one of the Srbijagas-related entities or another Project entity acts as beneficiary of expropriation, its relevant legal, property and land acquisition functions will constitute key stakeholders. Depending on the final allocation of responsibilities under national law and Project implementation arrangements, these functions may participate in the preparation and submission of expropriation proposals, coordination with competent municipal or city administrations, review of ownership and cadastral information, engagement of valuation expertise where applicable, communication concerning compensation processes, attempts to reach compensation agreements and subsequent proceedings where compensation cannot be agreed administratively.

National authorities and public institutions

Relevant national-level stakeholders are expected to include ministries, authorities and public bodies whose statutory responsibilities may be engaged by spatial planning, permitting, land acquisition, environmental and social assessment, construction or operation of the Program. These may include, as relevant:

- the **Ministry of Construction, Transport and Infrastructure (MCTI)**, including its **Sector for Spatial Planning and Urbanism**, and the **Spatial and Urban Planning Agency of the Republic of Serbia**, in relation to the preparation and coordination of spatial planning documentation, including the Spatial Plan for the Special Purpose Area, and related public participation procedures;
- the **Ministry of Finance**, including in relation to the legal framework and specific competences relevant to expropriation and preparatory activities;

- the **Ministry of Environmental Protection and other competent environmental authorities**, including in relation to environmental assessment, nature protection, permitting and other environmental requirements relevant to route planning and Project preparation;
- the **Republic Geodetic Authority (RGA)** and competent real estate cadastre and utility cadastre offices, responsible for cadastral records, ownership and other registered rights, registered easements and encumbrances, parcel identification, utility infrastructure data and registration of changes affecting immovable property;
- **relevant energy-sector regulatory institutions and public authorities**, including institutions responsible for gas-sector regulation, market governance and sector development;
- **competent water management authorities**, including institutions responsible for water conditions, river crossings, flood protection, drainage and other water-related requirements;
- **institutions responsible for nature conservation and cultural heritage protection**, including relevant national and territorial institutes whose conditions and expert inputs may affect route selection, design and mitigation measures;
- **competent road, railway, electricity, telecommunications and other infrastructure authorities and operators**, where proposed Program infrastructure intersects with or may affect existing or planned assets;
- **emergency management, fire and rescue, civil protection and other competent safety authorities**, as relevant to design, construction planning and emergency preparedness.

These stakeholders will be further differentiated according to the responsibilities applicable to each Program phase and specific section.

Local self-government authorities and administrations

Municipalities and cities along the wider pipeline corridor are key institutional stakeholders because of their roles in spatial planning, local infrastructure, property and legal affairs, environmental protection, agriculture and local economic development, social protection, public information and land acquisition and expropriation procedures as Project preparation advances.

For **Phase 1 (Trupale–Pojate)**, the stakeholder mapping currently includes relevant authorities and services in the **City of Niš and the municipalities of Aleksinac, Ražanj and Čičevac**, with further refinement based on the final route and areas of influence.

For **Phase 2**, this is expected to include relevant administrations and services in **Čičevac, Varvarin, Paraćin, Čuprija, Jagodina, Svilajnac and Velika Plana**, subject to refinement as the spatial planning and technical design processes progress and the final alignment is confirmed.

Equivalent categories of local authorities, administrations and services will be identified for Phase 3 as the northern transmission and storage concept, route development, feasibility studies, spatial planning requirements and the evolving division of institutional responsibilities become more clearly defined.

Within each affected municipality or city, relevant stakeholders may include:

- **city and municipal administrations or departments responsible for property and legal affairs**, including units competent to conduct first-instance expropriation procedures, issue procedural acts, organise hearings, communicate with affected rights holders and participate in statutory compensation procedures;
- **departments responsible for urban planning, spatial planning and construction**, including those providing local planning information, reviewing route interfaces and identifying conflicts with existing and planned development;

- **departments responsible for agriculture, rural development, forestry and water management**, particularly where route options may affect agricultural production, access to parcels, drainage, irrigation, soil use or rural livelihoods;
- **departments responsible for local infrastructure, roads, traffic and communal affairs**, including in relation to local roads, field access routes, utility crossings and restoration requirements;
- **departments responsible for environmental protection**, including local environmental information and potential environmentally sensitive locations;
- **departments responsible for social protection and other local services**, where their knowledge may assist in identifying participation barriers and disadvantaged or vulnerable persons or households;
- **local tax administrations and other local units holding relevant property, land-use or value-related information**, where applicable;
- **local public attorney or other legal representation functions**, where relevant to public property, local infrastructure or proceedings connected with Project preparation;
- **local public utility companies and service providers** responsible for water supply, wastewater, drainage, waste management, local roads and other infrastructure potentially intersecting with the proposed corridor;
- **relevant municipal departments or services responsible for communication with citizens**, public relations, citizen services, local administration, information disclosure and community engagement, as applicable;
- **local community councils** (mesne zajednice) and other locally recognised community representation structures, particularly as channels for local information, identification of actual land users and community concerns, identification of vulnerable or less visible households, and communication of local concerns and support to local-level engagement.

For land acquisition and expropriation, the relevant local property and legal affairs departments are particularly important because they conduct individual first-instance proceedings, communicate with owners and other rights holders, hold hearings, facilitate the administrative compensation stage and record whether agreement on compensation has been reached, with unresolved compensation matters subsequently addressed through the competent judicial procedure in accordance with national law. Because spatial planning is expected to cover the wider pipeline corridor, municipalities and cities potentially relevant to subsequent phases should not be treated solely as stakeholders to be identified at a later stage. They are already relevant, at minimum, in relation to corridor-wide spatial planning, provision of data and conditions, institutional coordination and public participation procedures.

Expropriation beneficiary and gas-sector implementation entities

The entity that will act as the **beneficiary of expropriation** for the relevant pipeline investment will be a key stakeholder in future land acquisition and resettlement processes. Based on the current institutional context, this is expected to be a competent gas-sector entity within the broader Srbijagas-related institutional structure, subject to formal confirmation of the final implementation and ownership arrangements.

Once confirmed, relevant functions within the beneficiary of expropriation are expected to include:

- **the legal department and/or legal and property affairs function**, given its potential role, depending on the final allocation of responsibilities, in the preparation and submission of expropriation proposals, participation in administrative proceedings before competent local

- authorities, communication with affected property owners and rights holders, review of property documentation and other procedural matters;
- the function responsible, where applicable under the final institutional arrangements, for **preparing, approving or communicating compensation offers during the administrative stage of the expropriation process**, including participation in negotiations concerning compensation after expropriation decisions become final, in accordance with national law;
- **technical and project development teams**, whose route, design and construction requirements may determine the extent of permanent acquisition, easements, temporary occupation, access needs and land-use restrictions;
- **environmental and social specialists**, once appointed or mobilised, in relation to implementation of the RPF, preparation of subsequent resettlement instruments, engagement with affected persons and monitoring of land-related impacts;
- **management and implementation functions responsible for coordination with MoME, the PIU, local self-governments, cadastral authorities and other institutions involved in land acquisition and Project delivery.**

Other relevant gas-sector entities include:

- **Gas Infrastruktura**, in relation to its role in the institutional and ownership framework for transmission infrastructure and the institutional strengthening activities envisaged under the Program;
- **JP Srbijagas and other relevant gas-sector companies or operators**, depending on their confirmed roles in Project preparation, infrastructure ownership, implementation, operation or interfaces with existing gas infrastructure;
- **operators of existing gas infrastructure**, where coordination is required concerning parallel corridors, crossings, safety zones, access or technical interfaces.

Institutions and professional actors relevant to land, valuation and compensation processes

In addition to the competent local expropriation authorities and the beneficiary of expropriation, certain institutions and professional actors may have roles relevant to the valuation of affected property, determination of compensation, identification of rights holders and resolution of individual land and property cases.

These may include:

- **the competent territorial organisational units of the Tax Administration**, in relation to the provision of assessments or other information relevant to the value of expropriated immovable property for compensation purposes under national procedures;
- **licensed valuation professionals and other qualified experts**, where specialist valuation or technical expertise is required in connection with affected land, buildings, crops, perennial plantations, business losses or other compensable assets and interests;
- **court-appointed experts**, where expert evidence is required in judicial proceedings concerning compensation or other disputed property-related matters;
- **competent courts**, where compensation cannot be agreed in the administrative phase and is subsequently determined in non-contentious proceedings, or where other disputes concerning ownership, inheritance, registration or property rights require judicial resolution;

- **public notaries, legal representatives and other relevant professionals**, where their functions become relevant to inheritance proceedings, representation of absent or multiple rights holders, powers of attorney, settlements, transfer documentation or other property-related matters;
- **authorities and institutions dealing with unresolved inheritance, ownership, registration or public property issues**, where such matters may affect the identification of rights holders, the conduct of expropriation procedures or the timely implementation of land acquisition.

These institutions and professional actors are not necessarily expected to participate in general Project stakeholder engagement activities. Their relevance arises from their statutory, judicial or professional functions in specific land acquisition, valuation, compensation or property-related cases. Where such cases affect Project implementation or the ability of affected persons to exercise their rights, the Project will take their respective roles into account in planning engagement, providing information and coordinating land acquisition and resettlement processes.

Social protection and inclusion stakeholders

Relevant other interested parties include **Centres for Social Work, local health and social service providers, organisations of persons with disabilities, Roma organisations where relevant, humanitarian and community-based organisations, and other public or civil society actors** with knowledge of individuals or groups who may face barriers to accessing Project information, consultations, grievance mechanisms or land acquisition, resettlement and livelihood restoration processes.

These stakeholders may assist in identifying participation barriers, appropriate outreach methods and the need for tailored engagement or additional support. The preliminary categories of disadvantaged or vulnerable individuals and groups are addressed separately in Section 3.4.

Civil society, professional, agricultural and knowledge stakeholders

Relevant other interested parties may also include:

- **civil society organisations and community-based organisations** active in environmental protection, rural development, land rights, social inclusion, disability, gender equality, transparency, community health and safety or other issues relevant to the Program;
- **farmers' associations, agricultural cooperatives and organisations representing agricultural producers and land users**, particularly in areas where agricultural land use and livelihoods may be affected;
- **business associations and chambers of commerce**, including local and regional business organisations;
- **professional associations and chambers** relevant to engineering, spatial planning, environmental assessment, agriculture, land management, geodesy and valuation;
- **universities, research institutes, independent experts and other knowledge holders** with relevant environmental, social, technical, archaeological, cultural heritage, agricultural or local-area expertise;
- **organisations representing or supporting disadvantaged or vulnerable individuals or groups**, where relevant to the Project area and identified participation barriers;
- **the Republic Institute for the Protection of Cultural Monuments and relevant regional or local institutes for the protection of cultural monuments**, which may be involved in

permitting, protection measures, archaeological chance finds procedures and potential heritage-related conservation activities;

- **environmental organisations, citizen initiatives and informal groups** with an interest in route selection, biodiversity, water, agricultural land, cumulative impacts or other environmental and social matters.

Contractors and other implementation-related stakeholders

As the Program advances, relevant stakeholders will also include contractors, subcontractors, supervising engineers, design teams, survey teams and other entities involved in surveys, site investigations, design, construction supervision, construction and operation. Their roles and engagement responsibilities will become more clearly defined through procurement, design and implementation arrangements and will be reflected in subsequent updates of the stakeholder mapping and engagement programme.

Project workers will also require appropriate information and engagement arrangements; however, labour and working conditions and the dedicated worker grievance mechanism will be addressed primarily through the applicable labour management arrangements and other instruments prepared in accordance with ESS2.

Media, wider public and development partners

Other interested parties also include:

- **national and local media**, given their role in dissemination of Project information and communication of public concerns;
- **the wider public**, including persons interested in national energy security, public investment, environmental and social impacts, spatial planning or land acquisition;
- **the World Bank**, in relation to Program preparation, financing and application of the Environmental and Social Framework;
- **other international financial institutions, development partners or international organisations**, where they have a relevant role or interest in gas-sector development, regional energy connectivity, environmental and social standards or related reforms.

The stakeholder mapping is therefore a living process. It will be updated throughout Program preparation and implementation to reflect: (i) progress in the corridor-wide spatial planning process; (ii) confirmation and refinement of relevant Phase 1, Phase 2 and Phase 3 routes, sites and areas of influence; (iii) identification of areas of influence and associated facilities; (iv) evolving implementation arrangements and confirmation of the beneficiary of expropriation for each relevant section; (v) findings of the ESIA and other environmental and social studies; and (vi) information obtained through consultations, land acquisition planning and the Project grievance mechanism.

3.4 Disadvantaged / vulnerable individuals or groups

It is particularly important to identify individuals or groups who may be disproportionately affected by Project impacts, have less capacity to cope with or recover from such impacts, or face barriers to understanding Project activities, risks and benefits, expressing concerns, accessing information, participating in consultations or using grievance and other available remedy mechanisms.

For the purposes of this SEP, vulnerability is understood in relation to the specific Program and Project context and the nature of potential impacts and participation barriers. It may arise from, among other factors, age, gender, disability or health condition, economic insecurity, disadvantaged status within the community, minority or marginalised status, dependence on other persons, dependence on land or natural resources, geographic isolation, limited literacy or digital access, insecure tenure or other circumstances. Several factors may overlap and reinforce one another, increasing both exposure to Project impacts and the risk of exclusion from stakeholder engagement.

Vulnerability will therefore not be assumed solely on the basis of formal group membership. It will be progressively assessed through stakeholder mapping, local consultations, ESIA studies and future land acquisition and resettlement planning, with particular attention to whether affected persons are able to receive and understand relevant information, communicate their concerns and participate in Project-related decision-making on terms reasonably commensurate with those available to other stakeholders.

At the current stage of Project preparation, potentially disadvantaged or vulnerable individuals and groups may include, but are not limited to, the following:

- **low-income households and persons experiencing economic or financial insecurity**, particularly where affected land, crops, access routes or other productive assets contribute materially to household subsistence or income. Such households may be more sensitive to temporary income losses, disruption of cultivation cycles, delayed restoration of land or compensation and may have limited resources to travel, seek professional advice or participate in repeated consultations;
- **small-scale agricultural producers and households highly dependent on land-based livelihoods**, including households combining subsistence and market-oriented production. They may be disproportionately affected by temporary occupation, crop losses, soil disturbance, access restrictions, disruption of drainage or irrigation and delays in restoring productive use. Seasonal agricultural workloads may also restrict their ability to participate in consultations held at standard times;
- **persons whose livelihoods or use of affected land are not fully visible in formal ownership records**, including family members cultivating land registered in another person's name, tenants, lessees, informal users and persons using land through family, informal or other non-registered arrangements. Such persons may be overlooked where communication and consultation rely primarily on cadastral ownership records;
- **women whose land use, agricultural work, livelihood contribution or other interests may not be fully reflected in formal ownership records**, including women using or depending on family land registered in the name of another household member. Potential barriers may include exclusion from ownership-based communication, unpaid care responsibilities, limited time to attend consultations, household decision-making patterns or limited direct access to land acquisition or compensation-related information;
- **elderly persons, particularly those living alone or in isolated rural households**, who may face mobility constraints, limited access to digital information, difficulty travelling to municipal centres or dependence on relatives or intermediaries for communication and administrative procedures;
- **persons with disabilities, reduced mobility, sensory impairments, or health-related circumstances** that materially affect access and participation, who may face physical, communication, transport or digital barriers and may require adapted information formats, accessible venues, additional time or individual outreach;
- **persons with limited literacy or limited familiarity with administrative and legal procedures, or difficulty understanding technical information**, who may be disadvantaged

where Project communication relies heavily on written notices, technical maps, cadastral references, legal terminology or complex explanations of route alternatives, protection zones, land acquisition procedures or grievance channels;

- **persons with limited access to digital communication**, including some elderly persons, low-income households and residents of rural or poorly connected areas, who may not be effectively reached where disclosure relies primarily on websites, email or online consultation tools;
- **single-parent households, persons with substantial unpaid care responsibilities**, who may have limited flexibility or capacity to attend consultations and participate in lengthy or repeated procedures;
- **persons living in geographically isolated or poorly connected settlements**, who may face practical barriers to receiving timely information, attending meetings or accessing municipal and Project-level institutions;
- **persons facing unresolved inheritance, ownership or registration issues**, including heirs whose rights have not yet been formally registered, co-owners and other rights holders whose interests may not be immediately apparent from cadastral records. Such circumstances may create barriers to timely communication, representation and participation in land acquisition processes;
- **absentee landowners and rights holders, including persons living elsewhere in Serbia or abroad**, where distance and lack of access to local information may create practical barriers to timely participation. Absentee status is not in itself treated as vulnerability but may require specific outreach where standard local communication channels are unlikely to be effective;
- **Roma and other marginalised or minority communities, where present and potentially affected within the Project area of influence**, particularly where socio-economic disadvantage, insecure tenure, discrimination, limited trust in institutions, language or communication barriers or limited access to formal information channels may affect participation. Their potential relevance and any specific participation barriers will be confirmed through local stakeholder mapping and consultation rather than presumed in advance;
- **persons or households highly dependent on natural resources or locally important shared resources**, where Project-related restrictions, access disruption or environmental changes may disproportionately affect livelihoods or well-being;
- **persons or households experiencing multiple and overlapping disadvantages**, for example a combination of low income, advanced age, disability, insecure land-use status, geographic isolation or high dependence on affected land or resources.

The relevance and composition of disadvantaged or vulnerable groups will be progressively verified and refined as relevant route and site planning, ESIA studies, stakeholder consultations, cadastral and land-use analysis and future land acquisition and resettlement planning advance.

For Phase 1, identification will draw in particular on engagement with relevant local self-governments, Local community councils (mesne zajednice), Centres for Social Work, relevant health and social service providers, organisations representing persons with disabilities, agricultural organisations, community-based organisations and other stakeholders with knowledge of local participation barriers and potentially less visible households. Where appropriate, this will be complemented by targeted consultations and socio-economic data collection.

For Phases 2 and 3, vulnerability considerations will be further developed as routes and areas of influence become clearer. In Phase 2, particular attention is expected to be relevant in relation to intensive agricultural land use, small-scale producers, non-owner users, economically insecure households and persons whose actual dependence on affected land may not be visible in formal

property records. For Phase 3, relevant factors will depend on the final route and infrastructure configuration and may differ substantially between rural agricultural areas, storage-related locations and more densely developed urban and peri-urban settings.

Engagement with disadvantaged or vulnerable individuals and groups may require specific measures and assistance to ensure that their awareness of relevant Project activities, risks, impacts and potential benefits, and their opportunity to provide input into Project-related decision-making, are reasonably commensurate with those of other stakeholders. Depending on identified barriers, adapted measures may include:

- local-level consultations rather than reliance only on meetings in municipal centres;
- one-to-one or small-group consultations;
- accessible venues and arrangements for persons with reduced mobility;
- simplified, non-technical and visually supported information;
- clear explanation of maps, cadastral references, Project impacts, land acquisition procedures and grievance channels;
- multiple disclosure channels combining written, telephone, in-person and digital communication;
- flexible consultation times that take account of agricultural work, employment and care responsibilities;
- targeted outreach through trusted local institutions, community representatives or organisations, while ensuring that such intermediaries do not substitute for direct engagement with affected persons where direct engagement is feasible;
- assistance for persons facing literacy, communication, mobility or digital-access barriers;
- direct outreach where standard public notices are unlikely to reach affected persons;
- culturally appropriate engagement methods where specific social, linguistic or cultural sensitivities are identified;
- additional measures for persons whose actual land use, livelihood dependence or interests are not reflected in formal ownership records.

Identification and engagement will be undertaken in a manner that respects privacy, dignity and data protection requirements. The Project will avoid unnecessary collection or disclosure of sensitive personal information and will not require individuals to publicly identify themselves as vulnerable in order to access appropriate engagement support.

Disadvantaged or vulnerable individuals and groups potentially affected by the Project will therefore be further identified, confirmed and consulted through dedicated and adapted means, as appropriate. The specific measures for facilitating their meaningful participation and incorporating their views are further described in Section 4.3 of this SEP.

4 Stakeholder Engagement Program

The stakeholder engagement programme during the current stage of Program preparation is designed to ensure a consistent, comprehensive, coordinated and culturally appropriate approach to engagement that builds on the completed Phase 1 scoping work and supports the main Environmental and Social Impact Assessment (ESIA), disclosure and consultation on relevant findings, route planning and refinement, spatial planning interfaces and future land acquisition and resettlement planning.

Given the Program-level character of this SEP and the different levels of maturity of the three proposed phases, the degree of engagement detail necessarily varies. The current SEP focuses in greater detail on Phase 1 and on the Trupale–Pojata pipeline section, while establishing a framework for engagement relevant to the preparation of subsequent Program phases. Stakeholder engagement for Phases 2 and 3 will be progressively refined as feasibility studies, route and site development, spatial planning, technical design and environmental and social assessment advance.

Engagement will be coordinated, where relevant, with the formally initiated spatial planning process for the wider Niš–Batajnica–Horgoš pipeline corridor and related public participation procedures. Such coordination is intended to improve the timely exchange of information and reduce unnecessary duplication, but statutory spatial planning consultation does not substitute for stakeholder engagement required under ESS10.

The engagement programme will remain iterative. Information obtained through consultations, fieldwork, grievances, ESIA studies, cadastral and land-use analysis and route or site development will be used to update stakeholder mapping, identify additional engagement needs and inform subsequent Project decisions and environmental and social studies.

4.1 Summary of stakeholder engagement done during project preparation **Scoping and initial route planning**

Stakeholder engagement undertaken during Project preparation to date has primarily supported: (i) understanding of the local institutional and socio-economic context; (ii) identification of potential environmental and social risks and impacts; (iii) review of existing and proposed pipeline corridors; (iv) understanding of previous experience with gas infrastructure, land acquisition, easements, temporary occupation and land restoration; (v) identification of relevant institutions and local communication channels; and (vi) completion of Phase 1I scoping and preparation of the ESIA, SEP and RPF.

Engagement undertaken to date has included meetings and information exchange with national and local institutions, field visits along relevant parts of the proposed corridor, discussions with representatives of relevant local self-governments and other stakeholders, and collection of available information on route conditions, land use, local infrastructure and previous experience with existing gas pipelines.

For Phase 1, engagement undertaken to date has been preliminary and targeted and should not be understood as a broad public consultation process. Its principal purpose has been to support environmental and social scoping, improve understanding of the preliminary route and the relationship with existing gas infrastructure, identify relevant institutions and future stakeholder groups, and investigate potential legacy issues associated with earlier gas pipeline development.

Preparation-stage engagement included a sequence of institutional meetings before and after a three-day field mission undertaken from 30 June to 2 July 2026. Prior to the mission, Project preparation discussions included a meeting with Srbijagas on 22 June 2026 and an MPA Gas Meeting on Environmental and Social issues on 24 June 2026. Taken together, these discussions addressed, among other matters, Project preparation, technical and legal aspects of pipeline development, spatial planning, environmental and social assessment, land access, expropriation and compensation practice, cadastral constraints, landowner communication and preparation of the forthcoming field mission.

The three-day field mission was undertaken jointly with representatives of MoME, including Assistant Minister Saša Koković, and with two representatives of Srbijagas who accompanied the team throughout the field visits. The Srbijagas representatives provided explanations concerning the existing gas transmission system, the preliminary route, technical and operational constraints, pipeline design and construction practice, the rationale for selected engineering solutions and experience from previous gas pipeline projects.

On 30 June 2026, meetings were held with representatives of the Municipality of Čićevac and the Municipality of Ražanj. On 1 July 2026, meetings were held with representatives of the Municipality of Aleksinac and the City Administration of Niš. Participants included local self-government leadership and representatives of relevant municipal and city administrations and technical services. These meetings provided the participating local authorities with initial Project-specific information on the planned pipeline and the ongoing environmental and social preparation process and enabled the team to obtain preliminary information on local conditions, existing infrastructure, land use, agricultural activity, planning and property matters, earlier gas pipeline experience and the availability of relevant local records.

The field mission also included joint inspection of selected locations along the preliminary route that had been identified as potentially relevant from engineering, environmental or social perspectives. These included river and infrastructure crossings, areas affected by floodplain or terrain conditions, locations where the preliminary route passes close to houses or other structures, sections where the proposed alignment diverges from the existing pipeline corridor and other locations requiring further assessment of access, land use or construction constraints. These observations were used to identify issues requiring further investigation during the main ESIA phase and related route planning and refinement and did not constitute confirmation of final impacts or mitigation measures.

On 2 July 2026, the social workstream included a professional discussion with a judge from the non-contentious department of the Basic Court in Niš concerning recurring issues arising in compensation proceedings, including valuation disputes and procedural aspects of cases where compensation is not agreed administratively. The same day, a limited number of exploratory interviews were conducted with farmers and other local land users in selected cadastral municipalities within the territory of the City of Niš. These discussions were not intended to constitute representative community consultation. Their purpose was to obtain preliminary qualitative information on actual agricultural land use, ownership and use arrangements, experience with existing gas infrastructure, compensation, access to land, restoration after construction and awareness of land-use restrictions and other implications associated with pipeline infrastructure.

A separate targeted discussion was also held with representatives of the Srbijagas legal function to understand practical experience with expropriation, compensation offers and negotiations, ownership and cadastral issues, difficult or unresolved property cases and litigation associated with gas

infrastructure. This discussion provided relevant institutional input for preparation of the RPF and future land acquisition and resettlement planning.

Following the field mission, written requests were sent to the relevant local self-governments seeking available documentation concerning the existing or historical gas pipeline, including, where available, route and planning documentation, expropriation proposals and decisions, agreements, cadastral records, information on registered rights and other records relevant to previous land acquisition, easement, compensation or construction experience. A limited set of documents has subsequently been received and is being reviewed as part of the ongoing legacy due diligence and preparation of the ESIA, RPF and SEP.

The preliminary review has also included examination of available cadastral and documentary information and a publicly available media report concerning alleged land acquisition and documentation problems associated with a Yugorosgaz pipeline section extending from the wider Niš/Trupale area towards the south. This is not the same pipeline section as the Phase 1 Trupale–Pojate Project, and the reported allegations have not been treated as verified findings for the present Project. The material has, however, been retained as a contextual due-diligence lead for further investigation of early disclosure, documentation of property arrangements, compensation practice and access to grievance and other remedy mechanisms.

A post-mission E&S debriefing and coordination meeting was held on 7 July 2026 to review findings from the field mission, identify information gaps and agree follow-up needs for the environmental and social workstreams.

The engagement and information-gathering undertaken to date have highlighted several issues requiring further investigation during the ESIA and subsequent land acquisition and resettlement planning. These include the relationship between registered ownership and actual land use; the position of farmers and other persons using land without being registered owners; the treatment and registration of earlier easements or other land-use rights or restrictions; valuation and compensation practices; possible construction-related damage and land reinstatement issues; access to affected parcels; unresolved inheritance or ownership matters; and the need for timely, direct and well-documented engagement with affected persons before land access or acquisition processes advance.

A summary of the principal stakeholder engagement activities undertaken to date is provided below.

Table 1: Summary of stakeholder engagement undertaken during Project preparation

Stakeholder(s)	Date / location / method	Purpose and key topics	Main information and follow-up
Srbijagas representatives and Project preparation counterparts	22 June 2026 , meeting / hybrid format	Project preparation and available technical and institutional information relevant to the proposed pipeline; existing gas transmission infrastructure; preliminary route considerations; coordination needs for subsequent environmental and social preparation.	Initial coordination with Srbijagas and clarification of technical and implementation context relevant to further Project preparation
MoME, World Bank, Srbijagas and other Project preparation participants	24 June 2026 , MPA Gas Meeting on E&S, Belgrade / hybrid	Environmental and social preparation; spatial planning interfaces; land access, expropriation and compensation practice; cadastral constraints; landowner communication; information needs and preparation of the forthcoming field mission.	Identification of key legal, cadastral, valuation and landowner-engagement issues; agreement on field mission preparation and need for further documentation and legal follow-up
Municipality of Čičevac	30 June 2026 , field mission meeting	Initial Project information; preliminary route; local conditions; existing gas infrastructure; planning, land and property matters; available records	Preliminary local information and identification of relevant documentation and follow-up needs
Municipality of Ražanj	30 June 2026 , field mission meeting	Initial Project information; rural and agricultural context; route conditions; infrastructure; earlier gas pipeline experience; available records	Preliminary information on local land use, agriculture, infrastructure and institutional context; follow-up documentation requested
Municipality of Aleksinac	1 July 2026 , field mission meeting	Initial Project information; preliminary route; agricultural land use; local infrastructure; earlier pipeline experience; land and property issues	Preliminary information on local agricultural, socio-economic and institutional conditions and issues requiring further investigation
City Administration of Niš	1 July 2026 , field mission meeting	Initial Project information; route and existing corridor; planning; cadastral and property matters; previous	Identification of relevant local information sources and records; follow-up

Stakeholder(s)	Date / location / method	Purpose and key topics	Main information and follow-up
		gas infrastructure; available documentation	needs for route, property and legacy due diligence
MoME representatives, including Assistant Minister Saša Koković; Srbijagas representatives; E&S and technical team	30 June–2 July 2026 , joint field mission	Inspection of selected locations along preliminary route; engineering, environmental and social constraints; existing infrastructure; river crossings; proximity to structures; route deviations	Identification of locations and issues requiring further assessment during scoping and ESIA; technical explanations provided by Srbijagas during field visits
Farmers and other local land users in selected cadastral municipalities in the Niš area	2 July 2026 , limited exploratory interviews during fieldwork	Actual land use; ownership/use arrangements; existing pipeline experience; compensation; access; restoration; awareness of restrictions	Preliminary qualitative information; issues identified for systematic verification through later ESIA and resettlement work; interviews not treated as representative consultation
Non-contentious department of the Basic Court in Niš	2 July 2026 , professional/institutional discussion	Compensation proceedings; valuation disputes; expert evidence; procedural issues in contested compensation cases	Preliminary understanding of recurring judicial issues relevant to future land acquisition and compensation planning; not treated as comprehensive review of court practice
Srbijagas legal function	Separate targeted meeting during preparation period	Expropriation practice; compensation offers and agreements; cadastral and ownership issues; unresolved cases; litigation	Practical information on the role of legal services and recurring issues relevant to RPF and future land acquisition planning
Relevant local self-governments	Post-mission written requests and follow-up	Historical route, planning, cadastral, expropriation, compensation and pipeline-related records	Limited documentation subsequently received and under review for legacy due diligence and E&S preparation
MoME, World Bank and relevant E&S / Project preparation participants	7 July 2026 , E&S debriefing and coordination meeting, Belgrade / hybrid	Review of field mission findings; information gaps; coordination of follow-up work	Consolidation of preliminary findings and identification of follow-up needs for E&S studies and Project preparation

In parallel with the stakeholder engagement activities summarised above, the preparation process has included supplementary desk-based due-diligence and documentary review. This has included review of available cadastral, administrative, planning and other documentary sources relevant to ownership, registered rights, pipeline infrastructure and historical property arrangements, as well as review of documentation subsequently provided by local self-governments and other institutions following the field mission.

The review has also included publicly available contextual information concerning possible legacy issues associated with earlier gas infrastructure development in the wider area. In particular, one identified media report concerning alleged land acquisition and documentation problems associated with a related Yugorosgaz pipeline section extending southwards from the wider Niš/Trupale area has been retained as a due-diligence lead. This is not the same pipeline section as the Phase 1 Trupale–Pojate Project, and the reported allegations have not been treated as verified findings for the present Project. The material is being used solely to identify issues requiring further investigation, including early disclosure, documentation of property arrangements, compensation practice and access to grievance or remedy mechanisms.

These supplementary desk-based activities do not constitute stakeholder engagement in themselves but provide contextual and documentary inputs to the ongoing scoping, ESIA, RPF and SEP preparation processes and help identify matters requiring further verification through consultation, fieldwork and subsequent studies.

A variety of methods have been used during preparation, including:

- Project-preparation and coordination meetings;
- targeted institutional and professional meetings;
- meetings with municipal and city leadership and relevant administrative and technical services;
- joint field inspections and direct observation of selected route locations;
- continuous technical discussions with Srbijagas representatives during the field mission;
- limited exploratory interviews with farmers and other land users encountered in selected locations;
- targeted discussion with the Srbijagas legal function;
- professional discussion with judges experienced in non-contentious compensation proceedings;
- review of route maps, cadastral information and available administrative and technical records;
- written post-mission requests for locally held planning, expropriation, compensation and pipeline-related documentation;
- review of documentation subsequently provided by local self-governments and other sources;
- telephone and electronic follow-up communication; and
- review of publicly available contextual information relevant to possible legacy issues.

The activities undertaken to date should be understood as preliminary scoping, institutional engagement and due-diligence work. They do not replace the broader, systematic and inclusive stakeholder engagement required as the ESIA studies, route planning and refinement and future land acquisition and resettlement planning advance. The information obtained has informed the stakeholder mapping in Section 3 and the engagement programme set out below and will continue to be tested, supplemented and updated through subsequent consultations and studies.

4.2 Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

The SEP Summary Table below outlines the engagement process, methods, sequencing, topics of consultation and target stakeholders for: (i) informing stakeholders about the Project and the ESIA studies; (ii) supporting scoping and baseline data collection; (iii) disclosure and consultation on ESIA findings and proposed mitigation measures; (iv) route planning and refinement; and (v) preparation for the management of impacts on land and livelihoods and future resettlement planning.

The engagement approach reflects the Program-level character of this SEP and the different levels of preparation of the three Program phases. The current programme is more detailed for Phase 1, while engagement for Phases 2 and 3 will be progressively refined as feasibility studies, route development, spatial planning, technical design and environmental and social assessment advance.

Engagement methods will be proportionate to the nature and significance of potential impacts and adapted to the characteristics and participation needs of the relevant stakeholder groups. The methods identified below are indicative and may be adjusted in response to route development, ESIA findings, stakeholder feedback, identified participation barriers or other information obtained during Project preparation.

As part of the ESIA phase, this SEP will be updated to further detail the stakeholder engagement strategy for all Program phases and to develop a detailed engagement programme to support construction and operation of the Phase 1 pipeline.

The World Bank and the Borrower do not tolerate reprisals or retaliation against Project stakeholders who express views, raise concerns, participate in consultations or use grievance channels in relation to Bank-financed activities.

The engagement activities set out below are indicative and will be refined in response to evolving Project information, stakeholder feedback, ESIA findings, route and site development and implementation experience. The methods, timing and responsible entities will be adjusted where necessary to ensure that engagement remains proportionate, accessible and meaningful.

Table 2: SEP Summary Table – Scoping Phase

Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Scoping Phase - activities undertaken³				
MoME, World Bank, Srbijagas and other Project preparation participants	Project preparation; technical and institutional context; key environmental and social issues; spatial planning interfaces; land access; expropriation and compensation practice; cadastral constraints; preparation of field mission	Project-preparation and coordination meetings; hybrid meetings; document exchange	MoME; PIU; ESIA team with relevant technical specialists	June and July 2026
City of Niš and municipalities of Aleksinac, Ražanj and Čičevac, including relevant planning, property, agriculture, infrastructure, environmental and social services	Initial Project-specific information; preliminary route; local conditions; infrastructure; agricultural land use; planning and property matters; previous gas pipeline experience; available documentation	Institutional meetings; discussions with relevant municipal services; field mission follow-up	MoME; E&S team; with participation of Srbijagas representatives	30 June and 1 July 2026; follow-up requests after mission
MoME representatives, including Assistant Minister Saša Koković; Srbijagas representatives; E&S and technical team	Selected engineering, environmental and social issues along preliminary route; river and infrastructure crossings; terrain and floodplain constraints; proximity to	joint field inspection; direct observation; continuous technical discussion	MoME; E&S and technical team; Srbijagas representatives	30 June–2 July 2026

³ The scoping-phase engagement activities summarised above are substantially complete. Any additional follow-up arising from outstanding information requests or clarification of scoping findings will be carried forward into the main ESIA and related Project preparation phase rather than treated as a separate continuation of the scoping engagement programme.

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
	houses; route deviations; access and construction considerations			
Farmers and other local land users encountered in selected cadastral municipalities in the Niš area	Actual agricultural land use; ownership and use arrangements; existing pipeline experience; compensation; access; restoration; awareness of restrictions	Limited exploratory interviews during fieldwork	E&S social team	2 July 2026
Srbijagas legal function	Expropriation practice; compensation offers and agreements; cadastral and ownership issues; unresolved cases; litigation	Targeted institutional meeting	E&S legal/social team; Srbijagas legal representatives	During preparation period
Non-contentious department of the Basic Court in Niš	Recurring compensation issues; valuation disputes; expert evidence; procedural aspects of contested cases	Professional/institutional discussion	E&S legal/social team	2 July 2026
MoME, World Bank and relevant E&S / Project preparation participants	Review of field mission findings; information gaps; follow-up needs	E&S debriefing and coordination meeting	MoME; World Bank; Project preparation and E&S teams	7 July 2026

Table 3: SEP Summary Table – ESIA/ESMP Phase

Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Project and ESIA/ESMP Phase				
MoME; PIU once operational; relevant national ministries, authorities and bodies exercising public authority identified in Section 3.3	Project status and preparation schedule; scope and progress of ESIA studies; key environmental and social risks and information gaps; institutional responsibilities; data needs; coordination with technical design, spatial planning, SEA and future land acquisition and resettlement planning	Formal institutional meetings; technical working meetings; written requests; document and data exchange; virtual meetings where appropriate	MoME; PIU once operational; ESIA team with relevant technical specialists	From commencement of the main ESIA phase; at key ESIA milestones and as information or coordination needs arise.
MCTI; Spatial and Urban Planning Agency of the Republic of Serbia; Spatial Plan preparation team; other authorities and institutions involved in the PPPPN and related planning procedures	Coordination between Project preparation, ESIA findings and the PPPPN; availability and timing of planning information; route and corridor development; environmental and social constraints; comments arising through statutory planning procedures; opportunities to use stakeholder feedback to inform route refinement	Formal coordination meetings; technical meetings; written information exchange; review of planning documentation; GIS and map-based coordination	Competent planning authorities and institutions; MoME / PIU; ESIA and technical/design teams	Throughout preparation of the PPPPN and ESIA; at key planning and route-development milestones.
General public; potentially affected communities; landowners and land users; local self-governments; other interested parties within the PPPPN planning area	General objectives and purpose of the Spatial Plan; initial conceptual planning solutions; possible corridor and route-development considerations; locally relevant environmental,	Statutory early public insight; public notices; access to early planning material; submission of written comments;	Competent planning authority / plan holder and relevant planning institutions; MoME / PIU for complementary Project-related engagement, as appropriate	During PPPPN preparation, before preparation of the draft plan; 15-day statutory early public insight period

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
	social, land-use and infrastructure issues	complementary ESS10 outreach where standard statutory channels may not adequately reach affected or vulnerable stakeholders		
City of Niš and municipalities of Aleksinac, Ražanj and Čičevac, including relevant planning, property, agriculture, infrastructure, environmental and social services	Project and ESIA progress; evolving route information; local environmental and social conditions; land use and agriculture; existing infrastructure; local development plans; previous gas infrastructure experience; potentially affected settlements and stakeholders; vulnerable or less visible groups; local communication channels	Formal meetings; meetings with relevant departments; technical workshops; written data requests; follow-up interviews; site visits; map-based discussions	MoME / PIU; ESIA team; relevant technical/design specialists	Early in the ESIA phase; at major ESIA and route-development milestones; additional follow-up as information gaps or material issues arise
Relevant local self-governments potentially associated with Phase 2, including Čičevac, Varvarin, Paraćin, Čuprija, Jagodina, Svilajnac and Velika Plana, subject to route refinement	Program and Phase 2 information; PPPPN preparation; emerging route and corridor considerations; local planning and infrastructure interfaces; available environmental and social baseline data; land-use and agricultural considerations; future stakeholder engagement needs	Institutional meetings; written requests; technical consultations; data exchange; virtual or in-person meetings	MoME / PIU; ESIA and phase-preparation teams; relevant planning institutions	During the ESIA and PPPPN preparation period; progressively as route and planning information become sufficiently developed

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Local self-governments and competent services relevant to Phase 3, once geographic and institutional scope becomes clearer	Current Program concept; feasibility and route-development process; information needs; local environmental and social context; future consultation and stakeholder mapping requirements	Institutional meetings; written information exchange; targeted consultations	MoME / PIU; relevant Phase 3 preparation and E&S teams	As feasibility studies, route or site development and institutional arrangements advance
Local community councils (mesne zajednice) and other locally recognised community structures in potentially affected areas	Project status; evolving route information; local land-use and access patterns; community concerns; actual land users; less visible households; existing pipeline experience; locally important infrastructure and resources; preferred communication channels	Settlement-level meetings; interviews; small-group discussions; participatory map review; field visits; locally appropriate notice and communication channels	PIU; ESIA social team; relevant LSG support	Progressively as potentially affected settlements are identified; repeated when material route or impact information becomes available
Potentially affected communities and residents within the Phase 1 area of influence	Project description and status; evolving route; scope and purpose of ESIA studies; key potential environmental and social risks; opportunities to provide local information; later disclosure of ESIA findings and proposed mitigation; Project grievance mechanism	Public consultation meetings; settlement-level meetings; small-group discussions; accessible non-technical information; maps and visual aids; Q&A sessions; written and electronic comments	MoME / PIU; ESIA team	During baseline and impact assessment where local information is needed; at disclosure of draft ESIA/ESMP and related instruments; additional engagement where material issues arise
Registered landowners and other formally identified rights holders in	Preliminary land requirements; route-related implications; potential	One-to-one meetings; small-group meetings;	PIU; ESIA social and resettlement specialists; beneficiary of expropriation	Progressively as route and impact information become sufficiently

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
areas where route information becomes sufficiently specific	permanent acquisition, easements or other land-use rights or restrictions, temporary occupation, access requirements and protection-zone restrictions; Project and RPF principles; expected next steps; information and grievance channels	map-based discussions; field visits; written and oral information	once formally confirmed, as appropriate	detailed; before key land-related decisions
Actual land users, tenants, lessees, informal or non-registered users and other persons whose interests may not be visible in cadastral records	Actual use and dependence on land; access; agricultural activities; potential temporary or permanent impacts; participation in future resettlement planning; available information and grievance channels	Field-based identification; one-to-one interviews; small-group consultations; socio-economic data collection where appropriate; direct outreach	PIU; ESIA social and resettlement specialists	During ESIA baseline and impact assessment; progressively expanded as route and parcel information becomes available
Farmers, small-scale agricultural producers, agricultural organisations, cooperatives and households dependent on land-based livelihoods	Crop cycles; seasonal land use; access to parcels; irrigation and drainage; temporary occupation; crop losses; soil handling and reinstatement; construction timing; livelihood sensitivities and mitigation needs	Focus groups; agricultural stakeholder meetings; individual interviews; field visits; seasonal consultations	PIU; ESIA social team; agricultural specialists as required	During social baseline and impact assessment; repeated during route refinement and resettlement planning; timing adapted to agricultural seasons where feasible
Women whose interests, land use or livelihood contribution may not be fully reflected in title records; single-parent households; persons with	Actual use of land and livelihood contribution; access to Project information; participation barriers; household-level impacts; potential land and	Targeted consultations; separate small-group discussions where useful; household-level	PIU; ESIA social and resettlement specialists	During social baseline and impact assessment; before key land-related decisions; repeated where participation barriers persist

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
substantial care responsibilities	livelihood implications; appropriate consultation arrangements	outreach; flexible scheduling; one-to-one engagement		
Disadvantaged or vulnerable individuals and groups identified under Section 3.4	Accessible explanation of Project activities, risks, impacts and potential benefits; participation barriers; specific concerns; potential disproportionate impacts; mitigation and assistance needs; grievance channels	Adapted small-group consultations; one-to-one outreach; accessible formats; local-level meetings; trusted intermediaries; home-based outreach where appropriate; culturally and linguistically appropriate methods where needed	PIU; ESIA social team; specialist support as required	Throughout the ESIA phase where relevant; targeted engagement before key decisions and during disclosure; repeated where barriers remain
Centres for Social Work, health and social service providers, organisations of persons with disabilities, Roma organisations where relevant, humanitarian and community-based organisations and other inclusion stakeholders identified in Section 3.3	Potential participation barriers; identification of less visible groups; appropriate outreach; accessibility requirements; potential need for tailored assistance; privacy-sensitive engagement arrangements	Targeted institutional interviews; small-group discussions; written follow-up; case-sensitive coordination where appropriate	PIU; ESIA social team	During social baseline and stakeholder mapping; follow-up where participation barriers or specific assistance needs are identified
Infrastructure owners and operators, public utilities and relevant technical entities	Existing and planned infrastructure; crossings; safety distances; access; potential conflicts;	Bilateral technical meetings; GIS and map review; written	Technical/design team; MoME / PIU; ESIA team	Throughout ESIA and route development; as required before key design or route decisions

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
	cumulative and interface risks; construction-related constraints; mitigation and coordination needs	exchange; site visits where required		
Environmental, water, nature conservation, cultural heritage and other specialist institutions	Baseline information; sensitive receptors; protected areas; river and water crossings; flood risk; biodiversity; cultural heritage; assessment requirements; route constraints; mitigation hierarchy; monitoring needs	Specialist technical meetings; written data requests; review of study findings; technical workshops; site visits where necessary	ESIA team; MoME / PIU; technical/design team	During specialist baseline studies; during impact assessment; before finalisation of relevant mitigation and monitoring measures
Civil society organisations, environmental groups, citizen initiatives and community-based organisations identified in Section 3.3	Project and ESIA scope; environmental and social risks; route-related concerns; locally relevant information; mitigation proposals; disclosure of findings and opportunities for comment	Targeted meetings; thematic workshops where justified; public consultations; written and electronic comments	PIU; ESIA team	During ESIA studies where relevant; during disclosure of draft ESIA/ESMP; additional engagement where material issues arise
Professional associations, universities, research institutes, independent experts and other knowledge stakeholders	Technical, environmental, social, agricultural, cultural heritage or local-area knowledge; ESIA findings; methodological or thematic issues; mitigation and monitoring proposals	Targeted expert meetings; thematic workshops; written consultation; technical review discussions	PIU; ESIA team	At relevant study milestones and during disclosure where specialist input would add value
General public; potentially affected communities; landowners and land users; local self-governments; other	Draft Spatial Plan; developed corridor and planning solutions; potential route implications; protection zones; infrastructure interfaces;	Statutory public insight into the draft plan; public notices; access to draft planning documentation;	Competent planning authority / plan holder and relevant planning institutions; MoME / PIU for complementary Project-related engagement, as appropriate	After preparation and expert review/control of the draft plan; 30-day statutory public insight period

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
interested parties within the PPPN planning area	land-use implications; comments and objections	submission of written comments; public session/presentation as applicable; complementary ESS10 engagement where needed		
Potentially affected communities, affected persons, other interested parties and wider public	Draft ESIA/ESMP findings; key risks and impacts; alternatives considered; proposed mitigation and monitoring; residual impacts; Project GM; explanation of how stakeholder feedback can be submitted and considered	Formal disclosure of draft ESIA/ESMP and relevant non-technical materials; public consultation meetings; settlement-level meetings where appropriate; website disclosure; printed copies at accessible locations; written and electronic comment channels	MoME / PIU; ESIA team	During formal disclosure of draft ESIA/ESMP; with sufficient time for review and comment; follow-up consultations as required
Potentially affected communities and stakeholders who provided comments during the ESIA process	How material comments and concerns were considered; changes made to route, assessment, mitigation or engagement arrangements; reasons where suggestions could not be incorporated	Consultation summary reports; updated non-technical information; written responses where appropriate; follow-up meetings on significant issues	PIU; ESIA team; technical/design team as relevant	Following key consultation rounds and before finalisation of ESIA/ESMP where practicable

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Wider public and national/local media	Project status; ESIA process; availability of disclosed documents; opportunities for consultation; key milestones; grievance mechanism	MoME / Project website; public notices; press releases; media briefings where appropriate; non-technical summaries	MoME / PIU	At major Project and ESIA milestones; at disclosure; when material Project information changes

Note: The statutory early public insight and public insight procedures associated with the PPPPN provide important opportunities for public participation and route-related feedback. They do not substitute for engagement under ESS10. The Project will therefore seek, where practicable, to coordinate the timing and content of complementary engagement so that information and concerns arising through the planning process can inform ESIA studies and route refinement, while Project-specific environmental and social engagement reaches affected persons and groups that may not be adequately reached through statutory planning procedures alone.

Table 4: Route Planning and Refinement

Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Route Planning and Refinement				
Potentially affected communities along preliminary or alternative alignments	Route options and constraints; locally important receptors; settlement interfaces; access; locally known environmental and social risks; opportunities for avoidance or impact reduction; relationship between route development, ESIA findings and the spatial planning process	Settlement-level consultations; participatory map review; field visits; visual route materials; small-group meetings; written and electronic comments where appropriate	Technical/design team; PIU; ESIA team	Before key route decisions; repeated when material route changes occur and at relevant planning milestones
Registered landowners, actual land users, farmers and other livelihood-dependent users	Actual land use; agricultural cycles; access; irrigation and drainage; structures and locally important assets; existing easements or restrictions; potential route-related impacts; feasible avoidance or minimization opportunities	One-to-one consultations; small-group meetings; field verification; map-based discussions; targeted interviews	PIU; technical/design team; ESIA and resettlement specialists	Iteratively during route refinement; before material decisions affecting identified areas, parcels or users
City of Niš and municipalities of Aleksinac, Ražanj and Čićevac, including planning, property, agriculture, infrastructure and environmental departments	Route interfaces; existing and planned development; local roads and utilities; agricultural land; public property; access; locally sensitive locations; cumulative and infrastructure interactions; opportunities to avoid or reduce impacts	Technical meetings; GIS and map review; site visits; written data exchange; focused departmental discussions	PIU; technical/design team; ESIA team; relevant local self-government services	At key route-development milestones; additional follow-up where material constraints or changes are identified

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Relevant local self-governments associated with Phase 2 and, as identified, subsequent Program phases	Emerging corridor and route information; local planning and infrastructure interfaces; major land-use and agricultural considerations; sensitive locations; future engagement needs; locally available data relevant to route refinement	Institutional meetings; technical consultations; GIS and map review; written data requests and exchange	MoME / PIU; relevant phase-preparation, technical/design and ESIA teams	Progressively as route and planning information become sufficiently developed; at key phase-specific route milestones
MCTI; Spatial and Urban Planning Agency of the Republic of Serbia; Spatial Plan preparation team; other relevant planning authorities and institutions	Coordination between route development, ESIA findings and PPPPN preparation; feedback arising through early public insight and later public insight; route and corridor implications; environmental and social constraints; consistency of planning and Project information	Formal coordination meetings; technical sessions; documentation exchange; GIS and map-based review	Competent planning authorities and institutions; MoME / PIU; technical/design and ESIA teams	Throughout relevant spatial planning and route-refinement stages; following material feedback or route changes
Infrastructure owners and operators, public utilities and other relevant technical entities	Crossings; safety distances; access; technical conflicts; existing and planned infrastructure; maintenance requirements; construction constraints; opportunities for design coordination and impact avoidance	Bilateral technical meetings; map and design review; written exchange; site meetings where required	Technical/design team; PIU; relevant Project entity	As required during route refinement and before confirmation of relevant route sections or technical solutions
Environmental, water, nature conservation, cultural heritage and other specialist institutions	Sensitive locations; avoidance and alternatives; water and floodplain constraints; biodiversity and heritage receptors; route-specific mitigation	Specialist technical consultations; written exchange; review of maps and study findings; site	ESIA and technical/design teams; PIU	During alternatives assessment and route refinement; before material route decisions affecting sensitive receptors

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
	requirements; implications of specialist study findings	visits where necessary		

Table 5: Managing Impacts to Land and Livelihoods and Supporting Resettlement Planning

Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Managing Impacts to Land and Livelihoods and Supporting Resettlement Planning				
Registered landowners and other formally identified rights holders	Land requirements; Project and RPF principles; types of potential land impact; expected procedures and sequencing; available information and grievance channels	Individual notification when appropriate; one-to-one meetings; information sessions; written materials	PIU; beneficiary of expropriation once confirmed; resettlement specialists	Before and throughout detailed land acquisition and resettlement planning
Actual land users, tenants, lessees and persons using land without formally registered rights	Identification of actual use and dependence; potential impacts; applicable eligibility and assistance principles; participation and grievance channels	Field-based identification; individual interviews; socio-economic survey; small-group discussions	PIU; resettlement/social team	During census, socio-economic assessment and preparation of phase- or site-specific resettlement instruments
Farmers and households dependent on agricultural livelihoods	Crop cycles; temporary occupation; access; crop losses; soil reinstatement; irrigation and drainage; livelihood impacts and restoration needs	Focus groups; seasonal consultations; individual interviews; field visits	PIU; resettlement and social specialists; agricultural expertise as required	During impact assessment and resettlement planning; adapted to the agricultural calendar
Women whose interests or use of land may not be visible in title records	Actual land use and livelihood contribution; access to information; participation in consultation and compensation-related processes; barriers to participation	Targeted or separate consultations where useful; household-level outreach; flexible scheduling	Social/resettlement team; PIU	During socio-economic assessment and resettlement planning; repeated where participation barriers persist
Persons affected by unresolved inheritance, co-ownership, registration or representation issues	Information needs; procedural implications; representation; participation	Individual case-based engagement; clear written and oral information;	Beneficiary of expropriation once confirmed; relevant legal/property teams; PIU oversight	As cases are identified and throughout relevant planning processes

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Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
	barriers; Project and grievance channels	referral to competent procedures where appropriate		
Absentee landowners and rights holders	Project information; available participation options; representation; remote communication channels	Direct mail where lawful and available; telephone; email; communication through authorised representatives; other appropriate outreach	Beneficiary of expropriation once confirmed; PIU oversight	As identified; repeated where contact is not established through standard channels
Vulnerable affected persons and households identified under Section 3.4	Disproportionate impacts; barriers to procedures; information needs; specific assistance; livelihood restoration needs	Individualised engagement; small groups; home visits where appropriate; trusted intermediaries; adapted materials	PIU; resettlement/social team; specialist support as required	Early identification and throughout planning; frequency adapted to individual needs
Local property and legal affairs departments in relevant municipalities and cities	Expropriation procedure; communication with affected persons; hearings; procedural sequencing; compensation stage; unresolved cases	Institutional coordination; legal and technical meetings; written exchange	Beneficiary of expropriation once confirmed; PIU	Before initiation of relevant procedures and throughout implementation
Competent territorial organisational units of the Tax Administration and other valuation actors, as applicable	Valuation-related inputs and statutory roles relevant to compensation	Formal requests; institutional or professional interaction	Beneficiary of expropriation and/or competent authority, as applicable	As required under national procedures

Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Centres for Social Work and relevant inclusion-support stakeholders	Identification of participation barriers; need for tailored outreach or additional support, subject to privacy safeguards	Targeted institutional coordination; case-sensitive consultation where appropriate	PIU; social/resettlement team	As needed
Local community councils (mesne zajednice) and other local structures	Outreach to less visible land users or households; communication of engagement opportunities; local concerns regarding access and livelihoods	Local meetings; information exchange; locally appropriate communication channels	PIU; social/resettlement team	Throughout planning, without substituting direct engagement with affected persons
Agricultural organisations, cooperatives and relevant professional associations	Recurring agricultural impacts; restoration practices; access; seasonal constraints; livelihood restoration considerations	Focus groups; thematic meetings; technical consultations	PIU; resettlement/social team; agricultural specialists	At key planning milestones and where recurring livelihood issues are identified

Construction and Operations Phases

Engagement arrangements for the construction and operation phases will be further developed during the ESIA phase and through subsequent SEP updates. These updates will be informed by the final route and detailed design, ESIA findings, land acquisition and livelihood impact assessments, PIU staffing and procedures, contractor mobilisation, construction schedule and the identification of site-specific risks and affected stakeholders.

The construction-phase SEP update will define the roles of the PIU, ESIA Consultant, supervision consultant, contractors, local self-governments and other relevant actors in relation to disclosure, community liaison, grievance management, notification of works, traffic and access arrangements, temporary land occupation, reinstatement, community health and safety, labour influx and ongoing engagement with affected persons and local communities. Operation-phase engagement arrangements will be further defined before commissioning and will address, as relevant, safety information, emergency communication, access restrictions, maintenance activities, grievance management and continued engagement with affected communities and relevant institutions.

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Any closure or decommissioning-related stakeholder engagement requirements will be addressed through future SEP updates if and when such activities become relevant and sufficiently defined.

4.3 Proposed strategy to incorporate the views of vulnerable groups

The Project will seek the views of disadvantaged or vulnerable individuals and groups identified in Section 3.4 through engagement methods adapted to the specific barriers, sensitivities and circumstances identified in the relevant communities.

The objective is to ensure that persons who may be disproportionately affected by Project impacts, have limited influence in household or community decision-making, face difficulties in understanding Project information or experience physical, economic, social, cultural, communication or geographic barriers are able to receive and understand relevant information, express concerns and provide input into Project-related decision-making on terms reasonably commensurate with those available to other stakeholders.

The Project will not assume that all members of a broad demographic or social category are vulnerable in the same way. Engagement measures will be selected in response to the actual barriers identified through stakeholder mapping, ESIA studies, local consultations, land and livelihood assessment and engagement with relevant support institutions and organisations. Several vulnerability factors may overlap and require combined measures.

The following measures may be applied, as appropriate.

Women and persons with unpaid care responsibilities. Engagement will seek to ensure that women are not excluded where formal ownership records, household representation patterns or consultation arrangements primarily capture male household members or registered title holders. Measures may include direct outreach to women whose use of or dependence on affected land is not reflected in formal title records; consultation times adapted to unpaid care and work responsibilities; separate or small-group discussions where this would enable freer participation; inclusion of women in household-level socio-economic interviews and livelihood assessment; and engagement with women's organisations or other trusted local organisations where relevant. Engagement teams should, where practicable, include women and be organised in a manner that supports safe and enabling participation.

Low-income households and economically insecure persons. Engagement will take account of the fact that transport costs, time away from work, repeated travel to municipal centres or reliance on professional advice may create barriers to participation. Measures may include settlement-level meetings, telephone follow-up, simplified information, repeated explanation of procedures, direct outreach and, where justified, assistance with practical access to consultation opportunities. Particular attention will be given to households whose dependence on affected land, crops or access routes may make them more sensitive to temporary or delayed impacts.

Small-scale agricultural producers and households dependent on land-based livelihoods.

Consultations will be timed, where feasible, to avoid peak agricultural periods and will address locally relevant issues such as crop cycles, access to parcels, irrigation and drainage, temporary occupation, soil restoration and seasonal livelihood dependence. Methods may include field-based interviews, small-group discussions, agricultural focus groups and direct engagement with both registered owners and actual users.

Elderly persons, particularly those living alone or in isolated rural households. Project information will not rely solely on digital channels or meetings in municipal centres. Measures may include local-level meetings, telephone communication, large-print or simplified materials where useful, repeated

oral explanation, involvement of trusted family members or support persons at the individual's request, and direct outreach where mobility or geographic isolation prevents effective participation. Where Project activities may temporarily affect access, particular attention will be given to communication with persons dependent on regular health, social or family support.

Persons with disabilities, reduced mobility, sensory impairments or other access needs.

Consultation venues and methods will be adapted, where required, to identified needs. Measures may include physically accessible venues, alternative meeting arrangements, larger print, electronic formats compatible with assistive technologies where feasible, telephone or one-to-one communication, captioning or sign-language support where a specific need is identified, additional time for consultation and support from relevant representative organisations. The Project will avoid a one-size-fits-all approach and will adapt communication to the actual participation barrier.

Persons with limited literacy, administrative literacy or difficulty understanding technical information.

Written notices alone will not be relied upon where they are unlikely to be effective. Measures may include oral explanation, simplified non-technical information, visual route materials, maps accompanied by clear explanation, step-by-step description of land acquisition and grievance procedures and opportunities to ask questions individually. Technical and legal terminology will be avoided or explained in accessible language.

Persons with limited digital access.

Project disclosure will combine digital and non-digital channels. Relevant information may be provided through municipal and local notice boards, Local community councils (mesne zajednice), printed materials, telephone communication, local meetings and other locally appropriate channels in addition to websites and electronic correspondence.

Persons whose use of or dependence on affected land is not visible in formal property records.

This may include tenants, lessees, informal users, family members cultivating land registered in another person's name and other non-title holders. Engagement will include field-based identification, direct interviews, socio-economic data collection and outreach through local sources while avoiding exclusive reliance on cadastral ownership lists. Such outreach will seek to ensure that actual use, livelihood dependence and potential impacts are understood and considered in subsequent planning.

Persons affected by unresolved inheritance, co-ownership, registration or representation issues.

These persons may require repeated and case-specific explanation of Project processes, available participation channels and the distinction between Project engagement, national legal procedures and the Project grievance mechanism. Communication should be provided in clear oral and written form and adapted where several co-owners, unregistered heirs or absent rights holders are involved.

Absentee landowners and rights holders. Although absentee status is not in itself treated as vulnerability, standard local communication channels may not be effective for persons living elsewhere in Serbia or abroad. Where relevant, the Project will use available lawful contact channels, including mail, telephone, email and communication through authorised representatives, and will provide practical information on remote participation opportunities.

Roma and other marginalised or minority communities, where identified within the area of influence.

Engagement will be designed in response to actual local circumstances and will not presume vulnerability solely on the basis of ethnicity or minority status. Where barriers are identified, measures may include engagement through trusted community actors or organisations, smaller and locally accessible meetings, culturally appropriate communication, language support where needed, repeated

outreach and specific attention to insecure tenure, limited trust in institutions or exclusion from formal information channels.

Persons living in geographically isolated or poorly connected settlements. Engagement will be brought closer to affected communities where travel to municipal centres creates a significant barrier. Measures may include use of Local community council premises, mobile or field-based consultations, combined site visits and consultations and telephone or other direct follow-up.

Persons dependent on others for communication, transport or administrative support. Where appropriate and with the individual's consent, engagement may involve a trusted family member, support person or representative while ensuring that the affected person's own views are sought and recorded.

Children and young people, where Project-specific impacts make their engagement relevant. Direct engagement with children will not be undertaken routinely. Where ESIA findings indicate specific issues affecting children or young people, such as community safety, access to schools, transport or use of local spaces, age-appropriate and safeguarding-sensitive methods will be used. Engagement may be undertaken through parents, schools, relevant child-protection institutions or organisations with appropriate expertise. Direct consultation with minors will only be undertaken where justified and with appropriate safeguarding arrangements.

The Project may also draw on the knowledge and support of Centres for Social Work, local health and social service providers, organisations of persons with disabilities, Roma organisations where relevant, agricultural organisations, community-based organisations and other trusted actors identified in Section 3.3. Their involvement may assist in identifying participation barriers and appropriate outreach methods, but will not substitute for direct engagement with affected individuals and groups.

Specific measures will be selected proportionately and will be recorded as part of stakeholder engagement planning and implementation. Where a consultation method is found not to be effective, the approach will be adjusted. Particular attention will be given to participation patterns, including whether certain groups remain absent or underrepresented despite formal opportunities to participate.

Engagement with disadvantaged or vulnerable individuals and groups will be undertaken in a manner that respects privacy, dignity and data protection requirements. The Project will avoid unnecessary collection or disclosure of sensitive personal information and will not require individuals to publicly identify themselves as vulnerable in order to receive adapted engagement support.

The effectiveness of these measures will be reviewed through consultation records, stakeholder feedback, grievance data, participation patterns and findings from the ESIA and subsequent land acquisition and resettlement planning. The SEP will be updated where additional groups, barriers or engagement needs are identified.

5 Resources and Responsibilities for implementing stakeholder engagement

5.1 Implementation Arrangements and Resources

The Ministry of Mining and Energy (MoME) will have overall institutional responsibility for ensuring that stakeholder engagement under the Project is planned and implemented in accordance with this SEP and the applicable requirements of ESS10. The Project Implementation Unit (PIU) established within MoME under Phase 1 will have the central day-to-day coordination, oversight, monitoring and reporting functions for SEP implementation, supported by the ESIA Consultant and other environmental, social and technical specialists as required.

During Project preparation and the main ESIA phase, the ESIA Consultant will have a central technical and operational role in the planning, implementation, documentation and progressive refinement of stakeholder engagement. This role reflects the close interdependence between stakeholder engagement, environmental and social baseline studies, impact assessment, route planning and refinement, identification of land and livelihood impacts, preparation and implementation of the RPF and subsequent resettlement planning.

Until the PIU has adequate operational capacity to coordinate these functions directly, relevant stakeholder engagement activities will be undertaken through MoME's Project preparation arrangements with substantial technical and implementation support from the ESIA Consultant, working in coordination with MoME, technical and design teams, relevant gas-sector entities, local self-governments, spatial planning actors and other Project stakeholders as required.

The implementation arrangements will reflect the fact that stakeholder engagement responsibilities differ according to the nature and stage of the activity. MoME will retain overall institutional responsibility, while the PIU will exercise Project-level coordination and oversight functions. The ESIA Consultant will lead or support engagement activities required for the ESIA process, environmental and social studies, route-related assessment, stakeholder mapping, engagement with disadvantaged or vulnerable groups, disclosure of assessment findings and the development and updating of relevant Project environmental and social instruments.

Specific engagement activities may also be carried out with the support or participation of technical and design teams, relevant local self-governments, spatial planning authorities, the entity acting as beneficiary of expropriation, gas-sector implementation entities, resettlement and livelihood specialists, contractors and other specialised advisers.

The transfer of day-to-day coordination functions to the PIU will be progressive and should be accompanied by appropriate capacity building, development of stakeholder engagement procedures, establishment of documentation and monitoring systems and practical support from experienced environmental and social specialists and consultants. The establishment of the PIU will therefore not, by itself, remove the need for continued specialist support where the nature, scale or sensitivity of engagement requires expertise beyond available internal capacity.

The proposed stakeholder engagement implementation arrangements are summarised below.

Table 6: Stakeholder Engagement Implementation Arrangements

Actor / entity	Main responsibilities
Ministry of Mining and Energy (MoME)	Overall institutional responsibility for SEP implementation; strategic oversight of stakeholder engagement; coordination with relevant ministries, national authorities and Project entities; ensuring consistency between stakeholder engagement and broader Project preparation and implementation arrangements; support to mobilisation and operationalisation of the PIU; oversight of major Project-level disclosure and consultation commitments.
Project Implementation Unit (PIU)	Day-to-day coordination and oversight of SEP implementation; preparation and maintenance of stakeholder engagement schedules; coordination of disclosure and consultation activities; oversight of engagement undertaken by consultants, Project entities and contractors; coordination with local self-governments and other stakeholders; maintenance of stakeholder engagement records and logs; coordination and oversight of the Project grievance mechanism; monitoring of participation and inclusion; identification of engagement gaps; preparation of internal and external stakeholder engagement reports; updating of the SEP as required.
PIU Director / designated PIU management function	Management oversight of SEP implementation within the PIU; ensuring allocation of adequate human and financial resources; escalation of significant stakeholder issues; coordination with MoME management and other Project decision-makers; ensuring that material stakeholder concerns are considered in Project planning and implementation.
PIU environmental and social specialists, once appointed	Technical leadership for ESS10 implementation within the PIU; stakeholder mapping and engagement planning; coordination and quality assurance of engagement activities; monitoring of stakeholder feedback and grievances; coordination with ESIA, RPF and subsequent resettlement instruments; preparation of SEP updates and engagement reports; progressive assumption of functions supported during preparation by the ESIA Consultant and other specialist advisers.
ESIA Consultant / environmental and social consulting team	Central technical and operational support for stakeholder engagement during Project preparation and the ESIA phase; development and periodic refinement of stakeholder identification and mapping; preparation and updating of the SEP; design, organisation, facilitation and documentation of consultations; integration of stakeholder engagement with environmental and social baseline studies and impact assessment; targeted engagement with potentially affected persons, landowners, actual land users, livelihood-dependent households and disadvantaged or vulnerable groups; engagement supporting route planning and refinement; identification and investigation of legacy issues relevant to current Project risks; coordination of stakeholder inputs relevant to the RPF and subsequent resettlement planning; disclosure and consultation on ESIA/ESMP findings; analysis of stakeholder feedback and recommendations for Project design and mitigation; support to the establishment of PIU stakeholder

Actor / entity	Main responsibilities
	engagement systems, procedures, records and monitoring arrangements; and provision of practical capacity-building and implementation support to MoME and the PIU as required.
Specialist subconsultants and experts mobilised through the ESIA or Project preparation process	Provision of technical expertise required for specific consultations or sensitive issues, including biodiversity, water, cultural heritage, agriculture and livelihoods, land acquisition, valuation and property issues, gender and social inclusion, disability inclusion, accessibility, Roma inclusion where relevant, safeguarding, conflict-sensitive facilitation and other specialist areas. Participation in consultation design and implementation where routine engagement capacity is insufficient.
Technical and design teams	Participation in consultations where technical explanation is required; preparation of understandable route and design materials; explanation of alternatives, crossings, protection zones, access arrangements and technical constraints; provision of evolving technical information to support meaningful engagement; consideration of stakeholder input relevant to route refinement and avoidance or mitigation of impacts.
Spatial planning authorities and planning team	Implementation of statutory participation procedures within their legal responsibilities; provision and exchange of planning information; coordination, as appropriate, with Project engagement so that relevant comments and issues arising through planning procedures can inform route development and environmental and social assessment.
Relevant local self-governments	Support to identification of local stakeholders and communication channels; dissemination of Project information through local channels where appropriate; provision of local data and institutional inputs; support to organisation of local consultations; participation of relevant technical and administrative departments; support to identification of participation barriers and local vulnerable or less visible groups; receipt and referral of Project-related concerns where arrangements so provide.
Local community councils (mesne zajednice) and other local community structures	Support to local outreach and communication; dissemination of information on consultation opportunities; identification of local concerns, actual land users and less visible stakeholders; support to locally accessible consultation arrangements. Their role will not substitute for direct engagement with affected persons.
Beneficiary of expropriation, once formally confirmed	Engagement related to future land acquisition and resettlement planning within its confirmed responsibilities; communication with affected rights holders and land users; coordination with competent expropriation authorities; participation in disclosure and consultation concerning land requirements, applicable procedures and compensation processes; maintenance and provision of relevant land-related records; coordination with the PIU and resettlement specialists.

Actor / entity	Main responsibilities
Gas-sector implementation entities, including relevant Srbijagas-related entities, as responsibilities are confirmed	Participation in stakeholder engagement relevant to technical development, infrastructure ownership, construction, operation, maintenance and interfaces with existing gas infrastructure; provision of technical and operational information; participation in consultations where their institutional or operational responsibilities are engaged.
Resettlement and livelihood specialists	Stakeholder engagement supporting census and socio-economic assessment, identification of actual land users and livelihood dependence, consultation on land and livelihood impacts, engagement with vulnerable affected persons, preparation and implementation of subsequent resettlement instruments and livelihood restoration measures.
Contractors and subcontractors, once appointed	Implementation of construction-related communication and stakeholder engagement obligations defined in procurement and contract documents; advance notification of works and access restrictions; management of construction-related community interfaces; coordination with the PIU and local authorities; maintenance of site-level engagement records; referral and management of grievances in accordance with Project procedures.
Supervision consultant / engineer, once appointed	Monitoring contractor compliance with stakeholder engagement and communication obligations; verification of implementation of site-level commitments; support to escalation and resolution of recurring stakeholder concerns; reporting to the PIU.
Other specialist advisers and external experts	Provision of specialised support where engagement involves complex technical, legal, social, cultural, accessibility, safeguarding or other sensitive issues requiring expertise beyond routine PIU, ESIA Consultant or contractor capacity.

The allocation of responsibilities described above does not assume that the PIU will immediately possess all specialist capacity required for effective SEP implementation. During Project preparation and the ESIA phase, the ESIA Consultant is expected to provide substantial technical and practical support to stakeholder engagement, while also supporting the development of PIU systems and capacity. Responsibilities will be progressively clarified and strengthened as implementation arrangements mature, while specialist consultant support will continue for activities requiring environmental and social assessment expertise, complex facilitation, engagement with disadvantaged or vulnerable groups, land and livelihood expertise or other technical capabilities not available within the PIU.

The implementation structure will be reviewed and updated as PIU staffing, procedures and operational responsibilities are further developed, institutional arrangements for individual Program phases are confirmed and responsibilities for land acquisition, construction and operation are further defined.

Mobilisation of Specialist Expertise

The Project will mobilise additional technical or specialist expertise where required to ensure that consultations are safe, accessible, meaningful and appropriate to the issues and groups concerned. Such expertise may include, depending on identified needs:

- specialists in disability inclusion and accessible communication;
- sign-language interpretation or other communication support;
- gender and social inclusion specialists;
- specialists experienced in safe consultation on sensitive social issues;
- child-protection or safeguarding expertise where engagement with children or adolescents is justified;
- Roma inclusion specialists or appropriately experienced community facilitators where relevant;
- livelihood and agricultural specialists;
- legal and property specialists for complex land, inheritance, valuation or compensation issues;
- specialists in cultural heritage or other community-sensitive matters where relevant;
- psychosocial or other specialist support where engagement concerns particularly sensitive circumstances;
- interpreters or language support where required; and
- facilitators experienced in conflict-sensitive or high-tension consultations.

Specialist support will be mobilised proportionately and on a needs basis. The need for such expertise may be identified through stakeholder mapping, ESIA findings, consultation experience, requests from affected persons or representative organisations, grievance trends or the advice of relevant local institutions, service providers or community organisations.

Where consultations concern disadvantaged or vulnerable groups or sensitive topics, the Project will ensure that engagement is designed and implemented with appropriate safeguards. This may include careful selection of facilitators, gender-sensitive team composition, private or small-group settings, accessible communication formats, informed participation, confidentiality arrangements, avoidance of unnecessary collection of sensitive personal information and referral to qualified support services where appropriate.

Where routine Project or consultant capacity is insufficient, such consultations will not be undertaken without appropriate specialist support. The form of support will be determined according to the nature

of the issue, the characteristics and preferences of the affected group and the potential risks associated with participation.

Documentation of Stakeholder Engagement Activities

Stakeholder engagement activities will be documented through a combination of:

- a Stakeholder Engagement Log maintained by the PIU or designated Project function;
- meeting and consultation records;
- agendas and presentation materials;
- attendance records, where appropriate and consistent with privacy considerations;
- minutes or consultation summaries;
- records of questions, concerns, comments and recommendations raised;
- records of commitments, responsible persons and follow-up actions;
- documentation of how material stakeholder feedback has been considered in Project design, route refinement, environmental and social assessment, mitigation measures, resettlement planning or other Project decisions;
- records of targeted engagement with disadvantaged or vulnerable groups, using privacy-sensitive documentation;
- disclosure records;
- correspondence and written submissions;
- grievance records maintained through the Project grievance mechanism;
- records of specialist support mobilised for sensitive or accessible consultations, where relevant; and
- periodic stakeholder engagement monitoring and reporting.

Where appropriate, records will distinguish between stakeholder categories, geographic locations, engagement methods, issues raised and participation patterns. Particular attention will be given to whether potentially affected persons, actual land users, women, disadvantaged or vulnerable groups and other less visible stakeholders are participating effectively or remain underrepresented.

The documentation system will seek to provide a traceable link between significant stakeholder concerns and subsequent Project actions. Material comments and concerns will therefore be recorded together with information on follow-up, including whether they informed further study, route review, mitigation, additional consultation, grievance handling or another Project response.

Personal data will be collected only where necessary and handled in accordance with applicable data protection requirements. Records relating to vulnerable persons, sensitive topics or individual grievances will be managed with additional regard to privacy, dignity and confidentiality.

The PIU will be responsible for consolidating stakeholder engagement documentation. Relevant Project preparation teams and consultants, including the ESIA Consultant, will maintain engagement records within their respective assignments and support their orderly transfer or consolidation under PIU and MoME arrangements.

Resources and Budget

Adequate human, technical and financial resources will be allocated for SEP implementation. Resource needs will be reviewed periodically and adjusted in response to the evolving Program scope, route

development, stakeholder needs, ESIA findings, land acquisition and resettlement planning requirements and implementation experience.

The stakeholder engagement budget is expected to cover, as applicable:

- PIU environmental and social staffing and stakeholder engagement support;
- continued specialist consultant support for ESS10 implementation;
- ESIA Consultant inputs required for stakeholder mapping, consultation design, facilitation, documentation and integration of stakeholder feedback into environmental and social assessment;
- travel and fieldwork;
- organisation of public consultations, settlement-level meetings, focus groups and targeted interviews;
- venue and logistical costs;
- preparation, translation, printing and disclosure of information materials;
- visual, map-based and non-technical communication materials;
- accessible communication formats and reasonable participation accommodations;
- specialist facilitators, interpreters and inclusion, accessibility or safeguarding expertise;
- targeted engagement with disadvantaged or vulnerable groups;
- agricultural, livelihood, land and property-related specialist engagement where required;
- local outreach and communication;
- digital and non-digital disclosure channels;
- grievance mechanism communication and operation;
- stakeholder surveys, perception studies or other feedback mechanisms where justified;
- documentation, monitoring and reporting;
- preparation and updating of the SEP; and
- additional engagement required in response to significant Project changes, grievances, emerging risks or unforeseen stakeholder concerns.

At the current stage of Project preparation, a final consolidated budget for SEP implementation has not yet been confirmed. The initial budget will be developed and incorporated into Project implementation planning as the PIU becomes operational and the timing and scope of the ESIA, route planning and refinement, spatial planning interfaces, land acquisition and subsequent implementation activities are further defined.

The budget will be reviewed and updated periodically. Where stakeholder engagement activities are implemented through specific consultant assignments, technical studies, resettlement instruments, contractor obligations or other Project workstreams, the associated costs should be reflected in the corresponding contracts, procurement documents, implementation budgets or work plans rather than assumed to be covered solely through a single central SEP budget line.

MoME and the PIU will be responsible for ensuring that the absence of a final consolidated budget at the current stage does not delay engagement activities required for meaningful consultation, timely disclosure, ESIA studies, route planning and refinement, participation of disadvantaged or vulnerable groups, land and livelihood planning or operation of the Project grievance mechanism.

Table 7: Budget Details

Budget categories	Quantity	Unit costs Euro (Month) ⁴	Cost/Year	Times/ Years	Total costs	Remarks
1. Estimated Staff salaries* and related expenses						
<i>Communications consultant</i>	1	7700	92400	5	462000	assumes 5 year contract period
<i>Travel costs for staff</i>	2	1200	28800	5	144000	assumes two vehicles available to the Consultant and shared by CLOs. With fuel and cost of lease of car Euro 1200 per month is estimated
<i>Community Liaison Officers</i>	1	5500	66000	5	330000	
<i>Specialist ESIA / E&S support for SEP implementation, stakeholder engagement and PIU capacity development</i>	1	8800	35200	5	176000	Input-based: 4 months per year over 5 years
2. Consultations/ Participatory Planning, Decision-Making Meetings						
<i>Project launch meetings</i>	3	5000			15000	for each phase
3. Communication campaigns						
<i>Posters, flyers</i>	5	3000			15000	
<i>Social media campaign</i>	1	25000			25000	including contract for media expert
4. Trainings						
<i>Training on social/environmental issues for PIU and contractor staff</i>	5	2500			12500	

⁴ Note all costs are in Euro but can be converted to USD for purposes of finalisation. Costs are indicative and will change as the project matures.

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Training on Gender-Based Violence (GBV) for PIU and contractor staff	5	2500			12500	
5. Beneficiary surveys						
Mid-project perception survey	4	10000			40000	
End-of-project perception survey	1	10000			10000	
6. Grievance Mechanism						
Suggestion boxes in villages	15	500			7500	selected accessible locations, subject to confirmation of local needs and across Project phases and affected areas, as needed
GM communication materials	15	2000			30000	selected accessible locations, subject to confirmation of local needs” and “across Project phases and affected areas, as needed
<i>Grievance investigations/site visits</i>	60	500			30000	assume 4 per year per phase
<i>GM Information System (setting up or maintenance)</i>	1	3000			3000	
7. Other expenses					5000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:	1,317,500.00 €					

*Note: Salary costs can be indicative

The budget will be further refined by MoME and the PIU, with support from the ESIA Consultant and other relevant consultants, as the scope, timing and implementation arrangements for stakeholder engagement activities are confirmed.

The inclusion of this budget in the SEP does not preclude subsequent adjustments to reflect actual Project needs, procurement arrangements, implementation capacity, field conditions or requirements arising from the ESIA, RPF, RAP/LRP and other Project instruments.

6 Grievance Mechanism

A Project Grievance Mechanism (GM) will provide accessible channels through which Project-affected parties and other stakeholders may submit grievances, concerns, queries, suggestions and positive feedback related to the environmental and social performance of the Project. The GM is intended to support timely identification and resolution of concerns, strengthen Project accountability and provide information that may help improve Project preparation and implementation.

The GM will be available without charge and without retaliation. Use of the GM will be voluntary and will not prevent or restrict access to judicial, administrative or other remedies available under Serbian law, nor to applicable World Bank accountability mechanisms.

At the current stage of Project preparation, a dedicated Project-level GM operated by the PIU has not yet been fully established. The GM will therefore be developed progressively through three interconnected arrangements:

- **interim grievance arrangements during Project preparation**, under which concerns received through consultations, field activities, correspondence or other Project preparation interactions will be recorded and referred for follow-up through MoME's existing Project preparation arrangements;
- **establishment of dedicated Project grievance channels and operating procedures during the next phase of Project preparation and ESIA implementation**; and
- **full PIU coordination and oversight of the GM once the necessary grievance channels, focal points, procedures and case-management systems are in place.**

The PIU established within MoME will assume responsibility for day-to-day GM coordination, registration, referral, monitoring, reporting and follow-up as the dedicated Project GM is operationalised. MoME will retain overall institutional responsibility.

During the interim period, the ESIA Consultant and other Project preparation consultants may receive concerns in the course of consultations, field visits, surveys and other engagement activities. They will not replace the responsible Project grievance function, but will record and refer Project-related concerns through arrangements agreed with MoME, subject to confidentiality, privacy and data protection requirements.

The GM will be designed and operated in accordance with the following principles:

- accessibility through multiple submission channels;
- no cost to complainants;
- availability to persons without specialised legal or technical knowledge;
- acceptance of grievances submitted orally as well as in writing;
- availability of confidential submission and, where practicable, anonymous submission;
- timely acknowledgement and follow-up;
- proportionate review and investigation;
- transparent communication on process and outcome, subject to privacy and confidentiality;
- protection against retaliation;
- accessibility for disadvantaged or vulnerable individuals and groups;
- careful handling of personal data;
- differentiated handling of sensitive grievances; and
- monitoring of grievance trends to identify recurring or systemic Project issues.

The GM will be capable of receiving concerns related to, among other matters, Project information and consultation; route planning and refinement; environmental and social impacts; access restrictions; temporary occupation; crop, property or infrastructure damage; land acquisition and compensation-related processes; construction impacts; community health and safety; contractor conduct; restoration of land and access; impacts on livelihoods; exclusion from consultation or information; behaviour of Project personnel; and other Project-related environmental and social concerns.

The GM will not replace formal procedures under national law for expropriation, determination of compensation, property disputes, administrative appeals or judicial proceedings. However, stakeholders may use the GM to raise concerns regarding Project communication, implementation of Project commitments, access to information, procedural problems within the Project's sphere of influence, treatment by Project personnel or other matters that the Project may be able to address, clarify, refer or follow up.

6.1 Grievance intake channels and case-management arrangements

The GM will be progressively established and operationalised during the next phase of Project preparation. Before commencement of the broader main ESIA consultation programme, the Project will establish and publicly disclose a minimum set of grievance intake channels and interim case-management arrangements. These arrangements will subsequently be integrated into the PIU-operated GM.

At a minimum, the Project will establish the following channels:

- **a dedicated Project telephone number**, with published hours for receiving calls and arrangements for recording and following up missed calls where feasible;
- **SMS-based submission** through the same or another designated Project number;
- **a dedicated Project e-mail address** for grievances, concerns, queries and suggestions;
- **written submission by post** to MoME and/or the PIU;
- **in-person submission** at a designated MoME/PIU location;
- **an online grievance form** available through the relevant Project or MoME website;
- **oral submission during Project consultations, field visits and other engagement activities**, with the concern recorded by the receiving team where the complainant consents; and
- **locally accessible submission or referral arrangements** through relevant local self-governments and, where appropriate, Local community councils (mesne zajednice), provided that such arrangements do not replace the central Project GM and that confidentiality and data protection are safeguarded.

Additional channels may be introduced where justified by stakeholder needs, Project scale, accessibility requirements and implementation experience. These may include:

- a toll-free hotline;
- grievance or suggestion boxes at selected accessible locations;
- dedicated social media channels for non-confidential queries and feedback; and
- other digital or mobile-based tools where a demonstrated need exists.

The Project will not rely solely on digital channels.

Final contact details, available submission channels, operating hours, instructions for use and expected response times will be publicly disclosed through the SEP, Project or MoME website, consultation materials and other appropriate local communication channels once established.

Table 8: Grievance Mechanism

Step	Description of process	Timeframe	Responsibility
GM implementation structure	The GM will operate under the overall institutional responsibility of MoME. During the current transition period, interim arrangements will be used to record and refer concerns received through Project activities while dedicated intake channels, a grievance register and case-management procedures are established. The PIU will coordinate day-to-day GM administration, including intake oversight, registration, referral, follow-up, monitoring and reporting, as these arrangements are operationalised. One or more designated GM focal points will be appointed. Detailed internal escalation and decision-making arrangements will be reflected in the PIU GM procedure.	Interim arrangements during preparation; minimum intake channels to be established before commencement of the broader main ESIA consultation programme; full integration into PIU arrangements once the dedicated GM channels and procedures are established	MoME; designated interim Project function; PIU
Grievance uptake	Grievances, concerns, queries, suggestions and feedback will be accepted through multiple channels. Minimum planned channels include dedicated telephone, SMS, Project e-mail, postal submission, in-person submission, online form, oral submission during consultations or field activities and locally accessible referral arrangements. Final contact details will be publicly disclosed once established. Anonymous submissions will be accepted where practicable.	Available continuously once the relevant channel is operational	PIU GM focal point(s); designated interim receiving functions
Registration and initial screening	Each grievance will be entered into a secure Grievance Register and assigned a unique reference number. Initial screening will identify subject matter, location, urgency, responsible Project function, whether immediate protective action may be required and whether a specialised or confidential pathway is needed. Grievances will be categorised for management and monitoring without prejudging merit. Sensitive complaints will not be entered into	Promptly upon receipt, normally within 2 working days	PIU GM focal point(s) / designated interim function

Step	Description of process	Timeframe	Responsibility
	the ordinary register in a manner that exposes confidential personal information.		
Acknowledgement and information to complainant	Receipt will be acknowledged through the complainant's preferred available communication channel. The acknowledgement will provide the reference number where appropriate, explain next steps and indicate the expected timeframe for follow-up. Where a matter clearly falls outside the GM mandate, the complainant will be informed and, where possible, directed to the appropriate mechanism or institution.	Normally within 2 working days of receipt	PIU GM focal point(s) / designated interim function
Sorting and referral	The grievance will be referred to the Project function or entity best placed to address it. Depending on the subject, this may involve MoME/PIU management, E&S specialists, ESIA Consultant, technical/design team, beneficiary of expropriation once confirmed, resettlement specialists, contractor, supervision consultant or another responsible entity. Conflicts of interest will be avoided. The person or entity whose conduct is the subject of a grievance should not control determination of that grievance.	Normally within 3 working days of registration , or immediately where urgent	PIU GM focal point(s), with relevant responsible function
Verification and investigation	The responsible function will review available information and, where necessary, seek clarification from the complainant, review documents, consult technical or specialist experts, undertake a site visit or obtain information from other responsible entities. Investigation will be proportionate to the seriousness and complexity of the grievance. The complainant will not be required to prove a credible concern to an unreasonable standard before it is examined.	Target of 10 working days for straightforward grievances; more complex cases may require additional time	Designated responsible function under PIU coordination; specialist support as required
Proposed response and resolution	A proposed response will explain, in accessible language, the outcome of the review and any corrective, remedial, clarification, referral or follow-up action proposed. Where resolution requires more	Normally within 15 working days of receipt for straightforward cases; if not feasible, an interim update and revised timeframe will be communicated	PIU / designated responsible function

Step	Description of process	Timeframe	Responsibility
	time, the complainant will receive an interim update explaining the status and expected next steps.		
Implementation of agreed action	Agreed or approved corrective actions will be assigned to a responsible person or entity and tracked to completion. Actions may include provision of information, corrective works, restoration, additional consultation, technical review, contractor action, referral, reconsideration of a Project decision within Project authority or other appropriate measures.	According to urgency and agreed action plan	Relevant responsible Project entity under PIU monitoring
Closure	A grievance will be closed when the agreed response has been implemented, the complainant has been informed of the outcome and relevant records are complete. Where the complainant does not accept the proposed resolution, this will be recorded and information on review or appeal options will be provided. Closure will not be represented as complainant satisfaction unless satisfaction has been expressed.	Following completion of response/action	PIU GM focal point(s)
Appeal / internal review	Where a complainant is dissatisfied with the proposed response, they may request review by a function not responsible for the initial determination. The final structure may include review by designated PIU management, MoME or another appropriately constituted review function. Use of internal review will not restrict access to other remedies.	Request normally accepted within 15 working days after communication of the initial outcome ; review timeframe to be specified in the final GM procedure	PIU management / MoME / other designated review function
Monitoring and evaluation	GM data will be periodically reviewed to identify grievance numbers and types, locations, response times, unresolved cases, recurring issues, contractor-related trends, land and livelihood issues and participation barriers. Reporting will use aggregated or anonymised information and protect confidential data. Significant trends will inform Project management, E&S risk management, engagement planning and SEP updates.	Ongoing; internal review at least quarterly , or more frequently where risk or grievance volume warrants	PIU; PIU E&S specialists; MoME oversight

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Step	Description of process	Timeframe	Responsibility
Feedback on GM performance	Complainants may be invited to provide voluntary feedback on accessibility, communication and handling of their case. Lack of satisfaction will be recorded separately from formal case closure. Feedback will inform improvements to the GM.	Following case handling and through periodic stakeholder engagement	PIU GM focal point(s)
Training and capacity building	Personnel involved in receiving, referring, investigating or monitoring grievances will receive training proportionate to their role. This will include confidentiality, data protection, communication with complainants, non-retaliation, referral of sensitive cases and differentiated handling of SEA/SH allegations. Contractors and supervision consultants will be trained on referral obligations and the distinction between the Project GM and worker grievance mechanisms.	Before assuming relevant responsibilities; refresher training periodically and when procedures change	PIU with specialist support; relevant contractors and consultants
Financial or other remedial actions, where relevant	Where grievance resolution identifies a justified need for payment, restoration, repair or another remedial action, implementation will follow applicable legal, contractual, financial and Project procedures. The GM will not independently determine statutory expropriation compensation or replace compensation procedures under national law or applicable resettlement instruments.	Case-specific	Competent responsible entity under applicable procedure; PIU monitoring where Project-related

The timeframes above are intended as proposed service standards for the Project GM. They may be refined through the final PIU GM procedure, provided that the resulting arrangements continue to support timely, proportionate and transparent grievance handling.

Interim Arrangements During Project Preparation

Until the dedicated Project GM is fully operational, Project-related concerns received through ongoing preparation activities will be handled through interim arrangements coordinated by MoME.

During this period:

- concerns raised during consultations, meetings, interviews, field visits or other Project preparation activities will be recorded where appropriate;
- the receiving consultant or Project representative will explain that the concern will be referred to the responsible Project function;
- the ESIA Consultant and other Project preparation consultants will maintain records of concerns received within their assignments and refer them through arrangements agreed with MoME;
- urgent concerns involving immediate safety, serious environmental or social risk or possible harm to a person will be escalated without waiting for ordinary case-processing steps;
- confidential or sensitive concerns will be handled through restricted communication and documentation arrangements; and
- relevant records will be transferred or consolidated into the Project GM system once established, subject to privacy and confidentiality requirements.

The interim arrangements are not intended to substitute for establishment of the dedicated GM. Their purpose is to ensure that concerns arising during the current preparation period are not lost or left without follow-up.

Accessibility and Adaptation for Disadvantaged or Vulnerable Groups

The GM will be implemented in a manner that takes account of the participation barriers identified in Sections 3.4 and 4.3. A grievance will not be rejected solely because it was submitted orally, informally or through a Project interaction rather than through a designated written form.

Where needed, measures may include:

- assistance in recording oral grievances;
- simplified explanation of the GM process;
- non-digital submission options;
- accessible communication formats;
- reasonable accommodation for persons with disabilities;
- support for persons with limited literacy or administrative literacy;
- local or field-based intake where travel creates a significant barrier;
- communication through an authorised or trusted representative, with the complainant's consent;
- additional time and support for persons requiring assistance to understand a response; and
- mobilisation of specialist expertise where safe handling of a grievance requires knowledge beyond routine GM capacity.

The Project will seek to ensure that persons who are not registered landowners, including actual land users, tenants, lessees, family cultivators and other potentially affected persons, are able to use the GM. Access to the GM will not depend on proof of registered ownership.

Where a grievance concerns a sensitive topic, a vulnerable complainant or circumstances involving a risk of harm, the ordinary grievance process will be adapted and specialist support mobilised as

necessary. Confidentiality, privacy and the preferences and safety of the complainant will be given particular attention.

Project GM and Land Acquisition, Compensation and Property-Related Grievances

Given the importance of land access, temporary occupation, easements, restrictions on land use, expropriation and livelihood impacts for the Program, the GM will be capable of receiving land- and property-related concerns.

Such concerns may include:

- lack of or delayed Project information;
- uncertainty regarding route or parcel impacts;
- alleged failure to identify an actual land user;
- concerns regarding access to affected parcels;
- temporary occupation;
- crop or other damage;
- land restoration;
- construction damage;
- communication concerning expropriation or compensation processes;
- alleged non-implementation of commitments;
- concerns regarding treatment by Project representatives;
- exclusion from socio-economic surveys or resettlement planning;
- livelihood impacts; and
- procedural concerns within the Project's ability to clarify, address or refer.

The GM will maintain a clear distinction between matters that the Project can address and matters reserved to competent administrative authorities, courts or other institutions under Serbian law. In particular, the GM will not replace formal procedures for determining expropriation compensation or resolving title and ownership disputes.

Nevertheless, submission of such a concern may enable the Project to provide information, verify Project records, identify procedural or communication problems, refer the matter to the competent function, monitor Project-related follow-up or address aspects falling within Project responsibility.

Use of the GM will not require an affected person to waive any legal right or available administrative or judicial remedy.

Worker Grievance Mechanism

A separate grievance mechanism will be available to Project workers in accordance with the applicable Labour Management Procedures (LMP), ESS2 requirements and relevant contractual arrangements. The worker grievance mechanism will address workplace concerns and will be proportionate to the nature and scale of the workforce and Project risks. It will be communicated to workers at the time of recruitment or engagement and will provide channels for raising workplace concerns without retaliation.

The Project GM described in this SEP is intended primarily for Project-affected parties and other external stakeholders and does not replace the worker grievance mechanism. Where a concern is

submitted through the wrong channel, it will be referred appropriately, subject to confidentiality and the nature of the case.

Contractors and subcontractors will be required to establish or participate in worker grievance arrangements consistent with applicable Project requirements. Detailed worker GM provisions will be set out in the LMP and relevant procurement and contractual documents.

Handling of SEA/SH Allegations and Other Highly Sensitive Complaints

The Project GM will include arrangements for the safe and ethical receipt and referral of allegations concerning Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) and other highly sensitive complaints. These arrangements will be proportionate to assessed Project risks and will be further developed as part of Project implementation arrangements, including relevant risk assessment, contractor mobilisation and mapping of appropriate support and referral services.

SEA/SH complaints will not be handled through the ordinary grievance investigation process. A survivor-centred approach will be applied, prioritising dignity, safety, confidentiality, wishes and informed choices.

At a minimum:

- designated confidential intake arrangements will be established;
- only the minimum information necessary for safe referral and Project-level accountability will be recorded;
- personally identifying or sensitive details will not be entered into the ordinary Grievance Register;
- information will be shared strictly on a need-to-know basis and with due regard to informed consent;
- ordinary GM focal points or complaint review bodies will not attempt to investigate the truth of the allegation, repeatedly interview the survivor or mediate between the survivor and alleged perpetrator;
- available referral options will be explained in a manner that respects the survivor's choices;
- referral to qualified services will be supported where available and desired by the survivor;
- allegations involving Project workers or contractors will be addressed through applicable accountability and contractual procedures without compromising confidentiality or survivor safety;
- anonymous or third-party reports will be handled cautiously and in accordance with the limits of available information; and
- reporting and monitoring will use non-identifying data.

Before personnel are assigned to receive or handle SEA/SH complaints, appropriate procedures, referral arrangements and training will be established. Where the PIU lacks the necessary expertise, qualified specialist support will be mobilised.

GM Records, Monitoring and Reporting

The PIU will maintain or oversee a secure Grievance Register. The register is expected to record, as appropriate:

- unique case reference number;
- date received;
- submission channel;

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- general location;
- grievance category;
- responsible function;
- acknowledgement date;
- actions taken;
- status;
- response date;
- outcome;
- follow-up actions; and
- closure status.

Personal information will be limited to what is necessary for case management and will be protected in accordance with applicable requirements. Sensitive grievances will be recorded through restricted arrangements appropriate to their nature and will not be included in the ordinary register in identifiable form.

Periodic monitoring will assess:

- number and type of grievances;
- geographic distribution;
- grievance channels used;
- acknowledgement and resolution times;
- open and overdue cases;
- recurring issues;
- contractor-related trends;
- land and livelihood-related trends;
- accessibility for disadvantaged or vulnerable groups;
- appeals or requests for review; and
- actions taken in response to systemic issues.

Aggregated grievance information may be included in Project reporting and stakeholder engagement updates, provided that confidentiality and personal data are protected.

7 Monitoring and Reporting

7.1 Summary of how SEP will be monitored and reported upon (including indicators)

Implementation of the SEP will be monitored through a combination of quantitative and qualitative information. Monitoring will assess not only whether planned engagement activities have taken place, but also whether relevant stakeholders have been reached, whether participation barriers have been identified and addressed, whether stakeholder feedback has informed Project preparation and implementation and whether the grievance mechanism is accessible and responsive.

MoME will retain overall institutional oversight of SEP implementation. The PIU will be responsible for consolidating stakeholder engagement monitoring information, maintaining relevant records, reviewing implementation performance and preparing periodic reports. During Project preparation and the main ESIA phase, the ESIA Consultant and other relevant Project preparation teams will contribute monitoring information relating to activities undertaken within their assignments and will support the further development of monitoring systems and procedures used by the PIU.

Monitoring arrangements will be proportionate to the stage of the Project and will evolve as PIU procedures and systems are further developed, the ESIA progresses, route planning and refinement advance, land acquisition and resettlement planning become more detailed and contractors and other implementation entities are mobilised.

SEP monitoring will include, as applicable:

- progress in implementing stakeholder engagement commitments reflected in the ESCP and this SEP;
- implementation of planned engagement activities and consultation milestones;
- stakeholder groups and locations reached;
- participation of Project-affected parties and other interested parties;
- participation barriers identified and measures taken to address them;
- engagement with disadvantaged or vulnerable individuals and groups;
- issues, concerns, suggestions and recommendations raised through engagement activities;
- changes made to Project design, route planning, environmental and social assessment, mitigation measures, resettlement planning or implementation arrangements in response to stakeholder input;
- issues requiring further study, clarification or follow-up;
- issues that fall outside the Project's authority or scope and require referral or explanation;
- performance of the Project grievance mechanism;
- recurring or systemic grievance trends;
- commitments made during consultations and status of follow-up actions;
- adequacy and effectiveness of disclosure methods and communication channels;
- use and effectiveness of specialist support for sensitive or accessible consultations where required; and
- need for updates to the SEP, stakeholder mapping, engagement methods or grievance arrangements.

Qualitative monitoring will assess the substance and significance of stakeholder feedback. Particular attention will be given to:

SEP – SGIIS Serbia Gas Pipeline

- issues that can be addressed through changes in Project design, route planning and refinement, ESIA findings, mitigation measures, ESMP provisions, the RPF or subsequent resettlement instruments;
- issues that can be addressed through changes in Project implementation arrangements or additional engagement;
- issues requiring coordination with another institution or statutory process;
- concerns that cannot be addressed by the Project because they fall outside its jurisdiction, technical scope or reasonable sphere of influence; and
- cases where a stakeholder proposal cannot be incorporated, including whether the reasons have been appropriately explained.

The monitoring system will seek to maintain a traceable connection between significant stakeholder concerns and subsequent Project responses. Where material comments influence Project decisions, this should be reflected in relevant consultation records, technical documentation, environmental and social instruments or follow-up reporting.

Quantitative indicators will be used selectively and proportionately. The Project will avoid treating the number of meetings or participants as the sole measure of successful engagement. Quantitative data will therefore be interpreted together with qualitative information on stakeholder concerns, participation barriers, responsiveness and outcomes.

The proposed monitoring framework is summarised below.

Table 9. Monitoring and Reporting on SEP Implementation

Key evaluation area	Specific evaluation questions	Potential indicators	Data collection methods
Implementation of planned stakeholder engagement	Were planned engagement activities implemented? Were they undertaken at the relevant stage of Project preparation or implementation? Where activities were delayed or not implemented, why?	Number and proportion of planned SEP activities implemented; number of consultations by Project phase, location and stakeholder category; number of planned activities delayed, cancelled or rescheduled; number of additional engagement activities undertaken in response to emerging issues	Stakeholder Engagement Log; consultation schedules; meeting records; PIU and consultant progress reports; ESIA documentation
Reach and coverage of engagement	Were relevant affected parties and other interested parties reached? Were geographic and stakeholder gaps identified?	Number and type of stakeholder groups engaged; geographic coverage of consultations; number of affected settlements or local areas reached; number of engagement activities involving landowners, actual land users, farmers or other relevant affected groups; identified stakeholder groups not yet reached	Stakeholder mapping; attendance and participation records; consultation summaries; field reports; gap reviews
Inclusion and accessibility	Were disadvantaged or vulnerable individuals and groups able to participate? Were identified participation barriers addressed?	Number and type of targeted or adapted engagement activities; number of identified participation barriers; number and type of adjustments made to improve accessibility; use of non-digital channels; use of accessible formats or reasonable accommodations where needed; specialist support mobilised for sensitive or accessible consultations	Consultation records; targeted engagement logs; ESIA social studies; feedback from participants and representative organisations; specialist reports
Quality and relevance of stakeholder participation	Did stakeholders have meaningful opportunities to raise concerns and provide information? Were key issues understood and documented?	Number and type of substantive issues raised; proportion of consultation records containing documented questions, concerns or recommendations; recurrence of the same unresolved concern across multiple engagements; stakeholder feedback on clarity and usefulness of information	Consultation minutes and summaries; question and comment logs; feedback forms where appropriate; interviews; focus groups
Influence of engagement on Project preparation and design	Did stakeholder input inform route planning, ESIA studies, mitigation or other Project decisions?	Number and type of Project actions taken in response to stakeholder feedback; number of route, design, assessment, mitigation or engagement adjustments informed by consultation; number of additional	Consultation follow-up matrix; design and route review records; ESIA documentation; action logs; decision records

Key evaluation area	Specific evaluation questions	Potential indicators	Data collection methods
		studies or site visits initiated following stakeholder input; number of issues formally referred for technical review	
Route planning and refinement	Were stakeholder concerns relevant to route and corridor development identified and considered?	Number of route-related concerns received; number of route locations reviewed following stakeholder input; number of feasible avoidance or minimisation measures considered; number of route-related issues carried forward for further study or planning coordination	Map-based consultation records; technical review notes; PPPPN coordination records; ESIA route assessment; field visit records
Land and livelihood engagement	Were affected rights holders and actual users identified and engaged? Were concerns relating to access, agriculture, land use and livelihoods captured?	Number of landowners and actual land users engaged where route information is sufficiently developed; number of cases involving users not visible in cadastral records identified through engagement; number and type of concerns regarding access, temporary occupation, crops, restoration or livelihoods; number of unresolved information gaps relevant to resettlement planning	Land and livelihood consultation records; socio-economic studies; RPF and subsequent resettlement planning records; field interviews; grievance data
Disclosure and access to information	Was relevant information disclosed in a timely and accessible manner? Did stakeholders know where and how to obtain Project information?	Number and type of disclosure actions; documents disclosed; number and location of non-digital disclosure points where relevant; website or online-form use where available; number of requests for information; repeated questions indicating information gaps	Disclosure register; website records where available; correspondence; consultation feedback; GM records
GM accessibility and use	Are stakeholders using the GM? Are available channels accessible to different stakeholder groups?	Number of grievances, concerns, queries, suggestions and feedback submissions; submissions by channel; proportion submitted orally, digitally, in person or through local referral channels; anonymous submissions where applicable; number of requests for assistance in submitting a grievance	Grievance Register; intake records; GM monitoring reports
GM responsiveness	Are grievances acknowledged, referred and addressed within	Number and proportion acknowledged within applicable timeframe; number and proportion	Grievance Register; case files; PIU monitoring reports

Key evaluation area	Specific evaluation questions	Potential indicators	Data collection methods
	expected service standards?	responded to within target timeframe; number of open cases; number of overdue cases; average or median processing time by grievance category; number of cases requiring interim updates	
GM resolution and follow-up	Are corrective or follow-up actions implemented? Are unresolved or recurring issues identified?	Number of grievances resolved; number closed; number remaining open; number subject to internal review or appeal; number of corrective actions completed; recurring grievance categories; number of systemic issues escalated to Project management	Grievance Register; corrective action logs; management review records
Handling of sensitive grievances	Are sensitive complaints received and managed through appropriate confidential arrangements?	Confirmation that designated confidential arrangements are operational; number of personnel trained for differentiated handling; number of cases referred through appropriate confidential pathways, reported only in non-identifying aggregate form; identified gaps in referral or specialist support arrangements	Restricted records; training records; non-identifying management reports; specialist review
Follow-up on commitments	Are commitments made during consultations tracked and implemented?	Number of commitments recorded; proportion assigned to a responsible function; proportion completed; overdue commitments; number of commitments requiring revised timelines or further engagement	Commitment and action tracker; consultation records; management reports
Effectiveness and adaptation of engagement approach	Are engagement methods working? What changes have been made in response to implementation experience?	Number and type of changes made to consultation methods, timing, locations or communication channels; number of new stakeholder groups added to mapping; adjustments made in response to low participation or repeated concerns; SEP updates completed	Periodic monitoring reviews; stakeholder feedback; ESIA findings; PIU and consultant reports; SEP revision records

A final set of indicators will be refined as the PIU becomes operational and Project implementation arrangements are further defined. Indicators may also be adjusted to reflect the differing maturity and engagement needs of Phases 1, 2 and 3. The Project will avoid collecting personal or sensitive data solely for monitoring purposes where such information is not necessary for effective management.

Where disaggregation is useful, monitoring data may be reviewed by stakeholder category, geographic location, engagement method or other relevant characteristics. Disaggregation by personal characteristics will only be undertaken where justified, proportionate and compatible with privacy and data protection requirements.

Sensitive grievances, including SEA/SH-related allegations, will not be reported through ordinary monitoring in a manner that could identify affected persons. Any monitoring of such cases will use strictly limited, non-identifying information and appropriate confidential arrangements.

7.2 Reporting back to stakeholder groups

Once operational, the PIU will consolidate stakeholder engagement and grievance information for internal management and Project reporting purposes. Reporting frequency and format will be aligned with Project implementation and ESCP reporting arrangements and may be refined as the PIU establishes its own monitoring and reporting procedures.

During Project preparation and the main ESIA phase, the ESIA Consultant and other relevant Project preparation teams will document and report engagement activities undertaken within their assignments. Relevant information will be provided to MoME and the PIU and consolidated into Project monitoring systems as appropriate.

SEP reporting may include:

- progress against planned engagement activities;
- status of relevant ESCP commitments;
- summary of stakeholder groups and locations engaged;
- major issues and concerns raised;
- actions taken in response to feedback;
- matters requiring further study or management attention;
- participation gaps and measures taken to improve inclusion;
- engagement with disadvantaged or vulnerable groups;
- status of disclosure activities;
- status and performance of the GM;
- recurring grievance trends;
- significant unresolved stakeholder issues;
- changes made to engagement methods or the SEP; and
- priorities for the next reporting period.

Internal reporting should distinguish between routine implementation information and matters requiring management attention. Significant unresolved concerns, repeated grievances, emerging stakeholder tensions, serious accessibility failures or issues with potential implications for Project design or E&S risk management should be escalated without waiting for the next routine reporting cycle.

Subject to the final PIU arrangements, internal SEP and GM monitoring may be reviewed at least quarterly during active Project preparation and implementation periods, or more frequently where the intensity of engagement, grievance volume or risk profile warrants.

Reporting will use aggregated information where possible and will protect personal and confidential data.

Reporting Back to Stakeholders

The Project will report back to stakeholders on relevant issues raised through engagement and on material changes made in response to stakeholder input. Reporting back is intended to demonstrate how views have been considered, explain decisions and maintain continuity between successive rounds of engagement.

Reporting back may be undertaken through a combination of:

- follow-up meetings with affected communities or stakeholder groups;
- consultation summaries;
- non-technical summaries of ESIA or other study findings;
- updated Project information materials;
- responses to comments and questions raised during consultation;
- disclosure through the MoME, PIU or Project website;
- local self-government communication channels;
- Local community councils (mesne zajednice), where appropriate;
- e-mail or written correspondence;
- direct communication with affected persons where issues are case-specific;
- public presentations or consultation events;
- information provided through the GM;
- periodic stakeholder updates or newsletters where justified; and
- other locally appropriate non-digital channels.

The method and timing of reporting back will depend on the nature of the engagement and issue concerned. Reporting back should occur sufficiently close to the relevant consultation or decision-making process to remain meaningful.

In particular:

- after significant consultation rounds, stakeholders should receive information on the principal issues raised and the next steps, where appropriate;
- during ESIA preparation, relevant stakeholders should be informed of material findings and how concerns have been considered in assessment and mitigation;
- during route planning and refinement, stakeholders should be informed, where practicable, about the treatment of significant route-related concerns and the limits of available alternatives;
- during land acquisition and resettlement planning, affected persons should receive clear information on subsequent steps, applicable procedures and available grievance channels;
- where a proposal or concern cannot be incorporated, the Project should explain the relevant technical, legal, jurisdictional or other reason where appropriate; and
- complainants using the GM will receive case-specific feedback in accordance with Section 6.

The Project will not rely solely on general website disclosure where direct or locally accessible feedback is needed for affected persons.

SEP Review and Updating

The SEP is a living document and will be reviewed and updated as necessary during Project preparation and implementation.

Updates may be required where:

- PIU staffing, procedures or implementation responsibilities are materially changed or further clarified;
- the Project GM and its final channels and procedures are established;
- the ESIA identifies additional stakeholders, impacts or engagement needs;
- route planning and refinement materially change the geographic area of influence;
- detailed information becomes available for Phases 2 or 3;
- land acquisition and resettlement planning identify additional affected persons or participation barriers;
- new disadvantaged or vulnerable groups or engagement needs are identified;
- stakeholder feedback indicates that existing engagement methods are ineffective;
- significant grievances or recurring issues reveal gaps in the SEP;
- contractor mobilisation changes stakeholder interfaces or engagement risks;
- material Project changes occur; or
- monitoring indicates that planned engagement measures are not achieving their intended purpose.

Updates will reflect implementation experience and will be proportionate to the nature and significance of the change. Material revisions affecting stakeholder rights, access to information, grievance arrangements or planned consultation processes should be disclosed through appropriate channels.

The PIU will coordinate future SEP updates with support from environmental and social specialists and consultants as required. During the ESIA phase, the ESIA Consultant will support review and updating of the SEP in response to study findings, consultation outcomes and evolving Project arrangements and to develop plan for engagement to support construction and operation phases.

Appendices

Appendix 1: Stakeholder Consultation Form

STAKEHOLDER CONSULTATION RECORD FORM

Serbia Gas Sector Development Multi-Phase Programmatic Approach (SGSD MPA)
Strategic Gas Infrastructure and Institutional Strengthening Project (P516640)

Instructions: *This form is to be completed by the PIU facilitator or Community Liaison Officer for each stakeholder consultation event. One form should be completed per participant for individual interviews, or one summary form per group for public meetings and focus groups. Completed forms should be filed with the PIU E&S team and summarised in periodic stakeholder engagement monitoring reports.*

A. CONSULTATION EVENT DETAILS			
Date:		Time:	
Location / Venue:			
Municipality:		Settlement:	
Consultation Type:	☐ Public meeting ☐ Focus group ☐ Individual interview ☐ Site visit ☐ Other: _____		
Facilitator / PIU Representative:			
Project Phase:	☐ Phase 1 (Trupale–Pojate) ☐ Phase 2 (Pojate–V. Orašje) ☐ Phase 3 (Northern corridor)		

B. PARTICIPANT INFORMATION			
Full Name:		Gender:	☐ M ☐ F ☐ Prefer not to say
Organisation / Affiliation:			
Contact (phone / email):		Settlement / Address:	
Stakeholder Category:	☐ Affected landowner / land user ☐ Farmer / agricultural producer ☐ Local resident (near corridor) ☐ Local government representative ☐ Business / enterprise owner ☐ Civil society / NGO ☐ Vulnerable / disadvantaged person ☐ Other: _____		

C. INFORMATION DISCLOSED TO PARTICIPANT	
Topics / documents presented:	
Materials provided:	☐ SEP summary ☐ ESIA summary ☐ Project factsheet ☐ Map / route ☐ Other: _____
Language of consultation:	☐ Serbian ☐ Roma ☐ Other: _____ ☐ Interpreter used

D. STAKEHOLDER FEEDBACK AND CONCERNS

Key issues / concerns raised:	
Suggestions / recommendations:	
Questions asked:	
Topic area(s):	☐ Land acquisition / easements restoration ☐ Route / alignment (dust, water) ☐ Construction disruption / access ☐ Safety / health ☐ Cultural heritage / protected areas ☐ Compensation / livelihood ☐ Environmental impacts (noise, dust, water) ☐ Employment / local hiring ☐ Grievance mechanism ☐ Other:

E. RESPONSE PROVIDED / FOLLOW-UP ACTIONS

Response given during consultation:	
Follow-up action(s) required:	
Responsible person / unit:	
Deadline for follow-up:	

F. ACCESSIBILITY AND INCLUSION

Accessibility measures taken:	☐ Accessible venue ☐ Transport provided ☐ Interpreter ☐ Childcare ☐ Visual aids ☐ Gender-sensitive timing ☐ Simplified materials ☐ Other:
Barriers to participation noted:	

G. GRIEVANCE MECHANISM AWARENESS

Was the GM explained?	☐ Yes ☐ No ☐ Participant already aware
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GM materials provided?	☐ Brochure / leaflet ☐ Contact card ☐ Verbal explanation ☐ None
Does participant wish to submit a grievance now?	☐ Yes (record separately on Grievance Intake Form) ☐ No

H. DATA PROTECTION CONSENT AND SIGNATURES

I consent to the recording of information provided during this consultation for the purposes of the SGSD MPA Project stakeholder engagement activities. I understand that my personal data will be processed in accordance with applicable data protection legislation and World Bank ESF requirements, and that I may request correction or deletion of my data at any time by contacting the PIU.

☐ I consent	☐ I do not consent (anonymous record only)		
Participant Signature:		Date:	
Facilitator Signature:		Date:	

Appendix 2: Grievance Submission Form

GRIEVANCE SUBMISSION FORM

Project Grievance Mechanism

Serbia Gas Sector Development Multi-Phase Programmatic Approach (SGSD MPA)

Strategic Gas Infrastructure and Institutional Strengthening Project (P516640)

How to submit a grievance

You may use this form to submit a grievance, concern, query, suggestion or feedback related to the environmental and social performance of the Project. The form may be submitted in person, by post, by email or through any other available Project grievance channel. You may also submit your concern orally — a Project officer will complete this form on your behalf.

The Grievance Mechanism is free of charge. You will not face retaliation for submitting a grievance. Use of this mechanism does not affect your right to seek remedy through courts, administrative bodies, or the World Bank's accountability mechanisms.

Submit to: PIU Grievance Focal Point, Ministry of Mining and Energy | [Dedicated phone / email / address to be inserted once established]

FOR OFFICIAL USE ONLY – DO NOT COMPLETE THIS SECTION

Grievance Reference No.:		Date Received:	
Received By:		Channel of Receipt:	☐ In person ☐ Phone ☐ Email ☐ Post ☐ SMS ☐ Online ☐ Consultation ☐ Other
Date Acknowledged:		Acknowledgement Method:	

A. COMPLAINANT INFORMATION

Grievances may be submitted anonymously. If you choose not to provide your name, the Project will still register and investigate your concern. However, providing contact information will allow us to keep you informed of progress and outcome.

☐ **I wish to remain anonymous**

Full Name:		Gender:	☐ M ☐ F ☐ Prefer not to say
Settlement / Village:		Municipality:	
Address:			
Telephone:		Email:	
Preferred contact method:	☐ Phone call ☐ SMS ☐ Email ☐ Post ☐ In person ☐ No contact requested		
Preferred language:	☐ Serbian ☐ Roma ☐ Other: _____		
Are you submitting on behalf of another person?	☐ No ☐ Yes – Name / relationship: _____		

B. CONFIDENTIALITY AND SENSITIVE CASES

All grievances are treated confidentially. Your personal information will not be shared with third parties without your consent, except as required for investigation of your concern. If your grievance involves a sensitive matter (e.g. sexual exploitation and abuse, sexual harassment, gender-based violence, discrimination or retaliation), it will be handled through a differentiated pathway with additional safeguards.

Do you wish this grievance to be treated as confidential?	☐ Yes ☐ No preference
Does this grievance involve a sensitive matter (SEA/SH, GBV, discrimination, retaliation)?	☐ Yes (will be handled through differentiated pathway) ☐ No ☐ Prefer not to say

C. DESCRIPTION OF GRIEVANCE OR CONCERN

Subject / topic:	☐ Land acquisition / easement / servitude ☐ Compensation (amount, timing, process) ☐ Temporary occupation / crop loss / soil damage ☐ Route / alignment concerns ☐ Construction impacts (noise, dust, vibration, traffic) ☐ Access restrictions / road closures ☐ Damage to property, infrastructure or utilities ☐ Environmental impact (water, soil, vegetation, drainage) ☐ Community health and safety ☐ Contractor conduct / behaviour of Project personnel ☐ Exclusion from consultation or information ☐ Restoration of land or access after works ☐ Employment / local hiring ☐ Other: _____
Location of issue:	
Date(s) the issue occurred or was noticed:	
Detailed description of the grievance or concern:	
Is this matter urgent?	☐ Yes – Reason: _____ ☐ No
Have you previously raised this concern?	☐ No, this is the first time ☐ Yes – When / to whom: _____ ☐ Yes – Previous reference number (if known): _____
<i>Please describe what happened, where, when and how it affects you. Attach additional pages, photographs or documents if needed.</i>	

D. DATA PROTECTION CONSENT AND SIGNATURE

I understand that the information I provide will be recorded in the Project Grievance Register and used solely for the purposes of investigating, managing and resolving my concern. My personal data will be processed in accordance with applicable data protection legislation and World Bank ESF requirements. I may request correction or deletion of my data at any time by contacting the PIU. Submission of this form does not affect my right to seek remedy through judicial, administrative or other mechanisms available under Serbian law or through applicable World Bank accountability mechanisms.

☐ I consent to the processing of my data as described above			
Complainant Signature:		Date:	
<i>If the grievance was received orally, the receiving officer should read this form back to the complainant, confirm accuracy, and sign below.</i>			
Receiving Officer Name:		Position / Role:	
Receiving Officer Signature:		Date:	

FOR OFFICIAL USE ONLY – INITIAL SCREENING AND REFERRAL			
Category assigned:	☐ Information request ☐ Complaint ☐ Suggestion ☐ Positive feedback ☐ Sensitive / SEA/SH		
Priority / urgency:	☐ Urgent (immediate action required) ☐ Standard ☐ Low		
Referred to:		Date referred:	
Target response date:		Actual response date:	
Summary of response / resolution:			
Complainant satisfied?	☐ Yes ☐ Partially ☐ No ☐ No response from complainant ☐ Anonymous (N/A)		
Status:	☐ Open ☐ Under investigation ☐ Resolved ☐ Closed ☐ Appealed		
Closed by:		Date closed:	