

RESETTLEMENT POLICY FRAMEWORK

ENABLING DIGITAL GOVERNANCE IN SERBIA (P164824)

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ABBREVIATIONS

ARAP	Abbreviated Resettlement Action Plan
BoE	Beneficiary of Expropriation
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
GoRS	Government of Republic of Serbia
GRM	Grievance Redress Mechanism
LGC	Local Grievance Committee
LGU	Local Government Unit
OITeG	Office for Information Technologies and Electronic Government
OMP	Operational Management Plan
OP 4.12	Operation Policy 4.12
PAP	Project Affected Persons
PCU	Project Coordination Unit
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RS	Republic of Serbia
RPF	Resettlement Policy Framework
SA	Social Assessment
EDGE	Enabling Digital Governance in Serbia Project
WB	World Bank

LIST OF DEFINITIONS/GLOSSARY

COMPENSATION. Payment in cash or in kind for asset/s and/or resource/s acquired or affected by a project. Compensation will be paid prior to taking possession of the land and assets in all cases, including where this is not possible due to the absence of the owners. In the case of absence of owners, the money will be deposited to an escrow account, or account alike.

CUT-OFF DATE. Date of socio-economic Survey determining the number of PAPs and the extent of impact on their structures and other assets. Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. Similarly, fixed assets (such as structures, crops, fruit trees, and woodlots) established after the cut-off date will not be compensated.

ECONOMIC DISPLACEMENT. Loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood.

EXPROPRIATION. The right of the Government by means of Eminent Domain to take or limit ownership rights over a property subject to compensation at replacement cost.

GRIEVANCE REDRESS MECHANISM. Project specific procedures and mechanism in place in parallel to official grievance panels, allowing affected people to lodge a complaint or a claim, related to direct or indirect impact from the Project, without cost and with the assurance of a timely and satisfactory resolution of that complaint or claim

INVOLUNTARY RESETTLEMENT. Resettlement is involuntary when land or non-land asset is acquired through the application of state powers. Actions may be taken without the displaced person's free prior informed consent or power of choice.

LIVELIHOOD RESTORATION. Measures aiming to assist physically and/or economically displaced persons to restore or improve their livelihoods and standards of living, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is to the benefit of the PAPs. Assistance must continue after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living.

MOVING ALLOWANCE. The moving allowance is a cash compensation for costs directly associated to moving/relocation of the household.

PAP. Project Affected Person is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from assets (structures, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

PHYSICAL DISPLACEMENT. Loss of shelter or property caused by acquisition of land in connection with the project, which requires the physical relocation PAPs from their pre-project place or residence, place of work or business premises.

REPLACEMENT COST. For agricultural land, replacement cost is the pre-project or pre-displacement, whichever is higher, market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes. For land in urban areas, it is the pre-displacement market value of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the

affected land, plus the cost of any registration and transfer taxes. For houses and other structures, it is the market cost of the materials to build a replacement structure with an area and quality similar to or better than those of the affected structure, or to repair a partially affected structure, plus the cost of transporting building materials to the construction site, plus the cost of any labour and contractors' fees, plus the cost of any registration and transfer taxes. In determining the replacement cost, depreciation of the asset and the value of salvage materials are not considered, nor is the value of benefits to be derived from the project deducted from the valuation of an affected asset. It also includes costs for levelling or other preparation for new construction or use. Costs are calculated based on the time at which the asset is being replaced, if not, inflation is considered in calculating costs.

ABBREVIATED RESETTLEMENT ACTION PLAN (ARAP). The document specifying the procedures to be followed and the Actions to be taken to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by an investment project in cases when less than 200 persons are affected by the Project and resettlement impacts are minor.

MINOR RESETTLEMENT IMPACTS. For resettlement to have minor impacts all of the following conditions have to be met: (a) Impacts are considered "minor" if the affected people are not physically displaced and less than 10 percent of their productive assets are lost, b) the remainder of their land is economically viable.

RESETTLEMENT POLICY FRAMEWORK (RPF). RPF is a Project level resettlement instrument aiming to set forth resettlement principles, organizational arrangements, and design criteria to be applied to subprojects to be prepared during project implementation. It contains clear definitions of conditions under which the resettlement (for a specific project, a sector program or within a political entity like a state or a province) will be planned and implemented. It defines issues like entitlement, principles of compensation, grievance processes and other legal procedures. An RPF is required for projects with subprojects or multiple components that cannot be identified before project appraisal.

STAKEHOLDERS. Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

| EXECUTIVE SUMMARY

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1 INTRODUCTION

1.1 Project description

Proposed Project Development Objective (PDO) is to improve access, quality, and efficiency of selected administrative e-Government services.

The proposed project is designed to support the Government of Serbia in improving access, quality and efficiency of selected e-government administrative services through three separate but interlinked components.

The project is proposing a holistic but phased approach focusing on ensuring the cross-sectoral foundations for e-government advancement are in place, before investing in significant technical assistance to move the e-Government agenda forward. Once the foundations are in place, the project focuses on activities to digitalize selected key government services to transform them into e-services while building capacity in the Government to implement the reform and of users to adopt the new e-services to be provided.

The project will support establishment of the backbone for the integrated, well-coordinated, and efficient delivery of e-government services. This will be done targeting three fronts: (i) developing the enabling foundations (regulations, infrastructure, interoperability and data management platforms); (ii) digitalization of selected services that provide quick wins, chosen based on criteria including: citizen and business demand, time/money savings, perception of corruption and ease of implementation, among others; and (iii) change management and capacity building to implement the reforms.

Component 1. Foundations for Digital Service Delivery

The objective of this component is to establish the necessary cross-cutting foundations to support the use of ICTs in the provision of public services to citizens, and businesses, including inter alia, regulations, standards, and digital infrastructure. The Component 1 includes six subcomponents:

Subcomponent 1.1 Regulatory foundations. Activities under this subcomponent include: (i) identifying legal vacuums and overlapping mandates in the regulatory framework of Serbia's e-government agenda in line with the EU accession requirements; (ii) consolidating institutional coordination mechanisms; (iii) enhancing compliance with the EU General Data Protection Regulation as well as devising privacy and security regulations aligning with best practices.

Subcomponent 1.2 Interoperability Platform. The project will help create the interoperability platform as an integrated tool through which exchange of data between government entities will take place.

Subcomponent 1.3 Development of a Government Meta-Register. This subcomponent will support necessary assessments of key registries, upgrading and harmonization activities required to support the interoperability of multiple registries through one Meta Register. (e.g. Address Register, Registry of Citizens, Cadaster, and Business Registry).

Subcomponent 1.4 Document Management. Activities under this subcomponent will include: (i) establishment of methodologies, procedures and guidelines for the collection, storage, management, and use of data; and (ii) support for digitization of key registries' data.

Subcomponent 1.5 Implementation of the G-Cloud and Data Disaster Recovery Center. Activities under this subcomponent include: (i) the provision of equipment for the functioning of the Data Disaster Recovery Center; (ii) feasibility assessment and cost estimations of data storage systems (cloud readiness assessment); and (iii) support for the implementation of the g-Cloud.

Subcomponent 1.6 Strengthening Cybersecurity and Data protection. Activities under this subcomponent include: (i) analysis of the existing regulatory framework for cybersecurity and data protection with recommendations for improvement; (ii) support in preparation of bylaws and other regulations needed for full implementation of the GDPR; (iii) design and delivery of a training program for cybersecurity and data protection.

Component 2. Transforming Services for Citizens and Businesses

The objective of this component is to support re-engineering, digitalization, and piloting of selected administrative e-services. It will support improvements in back-office processes to reduce administrative burdens and increase efficiency of administrative service delivery to citizens and businesses. Activities under this component will include: (i) inventory of existing administrative services for citizens and businesses; (ii) conducting business process re-engineering and optimizing selected services including process mapping, procedure streamlining and automation; (iii) the development and implementation of shared ICT services to centralize selected Government back-office operations; and (iv) support for CSCs and e-service kiosks piloting key selected e-services depending on citizen demand. The Component 2 includes four subcomponents: *2.1 Administrative Service Inventor; 2.2 Business Process Re-engineering; 2.3 Digitalization of Pilot Services; and 2.4 Strengthening Digital Skills.*

Component 3. Change Management and Institutional Strengthening

The key result of this pillar is enhanced capacity for project management and institutional coordination to achieve project results. Activities under this component will include: (i) support for change management and coordination; and (ii) establishment of a Project Management Unit (PMU). The Component 3 has two subcomponents: *3.1 Change Management and Coordination; and 3.2 Project Management.*

1.2 Project activities that cause land acquisition and asset loss, and expected scope of such impact

Only under Subcomponent 1.5 of Component 1 of this Project can land acquisition be expected as it envisages provision of the equipment for the new national Data Recovery Center, which will be constructed in parallel to this Project¹. The impacts will be limited to land acquisition and are highly unlikely to require resettlement of residential structures or impact business.

This subcomponent will consist of construction of Data Centre Facility buildings of gross surface area approximately 5,000 m², that will initially consist of 4 modules:

- 1 module would be dedicated for e-Government of Republic of Serbia and its users
- 1 module for state authorities with special requirements related to data and equipment security (such as Ministry of Foreign Affairs and Ministry of Defense)
- 2 modules for commercial users

Usable area (so called “white space”) of one module would be approximately 600m², with estimated capacity per module of 230 racks (for Modules 1, 2, 3) and 192 racks (Module 4).

¹ Considered as affiliated facility.

In addition to “white space”, Data Centre Facility shall include administrative part of approximately 1.000-1.500 m², conforming sufficient space for the employees, meeting rooms, NOC (network operations centre, also known as a "network management centre"), sanitary rooms, etc.

The construction of new roads is not envisaged.

1.3 Justifications to develop a Resettlement Policy Framework

As a location of the area to be acquired is known, an Resettlement Action Plan (RAP) will be prepared in line with the processes as defined in this Resettlement Policy Framework (RPF). RPF is prepared to guide potential land acquisition and resettlement for the implementation of Data Recovery Center in accordance to the requirements of the World Bank (WB) and its Operational Policy 4.12 and fit with the national legislation.

WB OP 4.12 indicates that a Resettlement Policy Framework (RPF) needs to be prepared at appraisal if the project may involve involuntary resettlement. The objective of this document is to provide guiding principles for the EDGE Project implementation intended to ensure timely, adequate and efficient actions, specified by priority, in order to avoid, minimize and compensate all adverse impacts during resettlement. RPF is prepared in accordance with the legal system, laws and procedures of Republic of Serbia, in conformity with WB resettlement policies and good international practice. RPF also provides the mandatory basis for developing site specific resettlement instruments; RAP, ARAP or Integrated RAP, to be developed as appropriate during Project implementation that lead to resettlement.

1.4 Fundamental principles guiding resettlement

During implementation of the Project, the need for land acquisition and involuntary resettlement might occur as a result of civil works planned under a limited number of components of the Project. This document provides overarching and binding principles to be applied in all cases of physical resettlement, economic displacement and all other adverse social impact caused by Project implementation regardless of the phase. These principles shall govern all actions of the PIU and its representatives, its PIU, their subsidiaries if any, contractors, all other state and local institutions involved in the Project implementation.

The fundamental principles guiding resettlement in EDGE Project are:

- If possible, all resettlement should be avoided by exploring all viable alternatives during Project design and selection of alternatives.
- If avoidance is not possible, adverse effects should be rendered to the bare unavoidable minimum.
- When unavoidable adverse effects and social impact occurs, all loss of property shall be compensated at the value of replacement costs and PAPs livelihood restored at least to the level before the start of investments that cause such loss or improved.
- PAPs will be assisted in all phases of the Project in their effort in livelihood restoration and living standards in real terms to level prior to the start of investments that cause such losses.
- All resettlement needs to be managed in accordance with national laws, OP 4.12 and accepted international good practices. Where gaps exist between them, provisions of this document i.e. OP 4.12, or more stringent one between them based on the agreement between the Bank and the Government

of Serbia. As a fundamental rule, under this RPF, during implementation of the Project, policy that is most beneficial to the PAPs will always prevail.

- Project PIU will be involved in all resettlement activities and at the earliest stage possible in the project design, in order to provide cost-effective, efficient and timely implementation of principles and objectives set by this RPF, as well to promote innovative approaches for improving the livelihoods and standards of living of those affected by involuntary resettlement.
- Special support will be provided to vulnerable groups during resettlement process, as well as during implementation of all phases of the Project according to their specific vulnerability.
- The Project will ensure a gender sensitive approach by inclusion of women, part of affected households, in all public consultation and discussions on specific mitigation measures. All activities in this RPF will aim to be gender tailored, with the goal to empower women and provide with the possibility to participate in mitigation measures provided for resettlement impact. The documentation for ownership or occupancy, such as title deeds and lease agreements (including the bank accounts established for payment of compensation), will be issued in the names of both spouses, if the expropriated assets are part of marital property of both spouses. Other resettlement assistance, such as skills training, access to credit and job opportunities will be made equally available to men and women and adapted to their needs.
- In accordance with this RPF, Resettlement Action Plans (RAP(s), or Abbreviated RAP (ARAP) as appropriate, will be prepared. RPF and the RAP(s) and/or ARAPs, will be publicly disclosed during public consultations held prior to its final approval and prior to start of works that cause physical or economic displacement, to allow affected persons and stakeholders to participate in Project development, planning and implementation of resettlement programs.
- As part of the preparation of site-specific RAP or ARAP and before civil works that cause relevant physical or economic displacement, a Grievance Redress Mechanism (GRM) accessible to affected people will be developed per this RPF. During the Project implementation and resettlement cycle, stakeholders will be provided with full information about their grievance rights, possibilities and procedures. All grievances will be considered during Project implementation and resettlement activities.
- All resettlement activities should be conceived and conducted as sustainable projects by providing sufficient investment resources to enable principles and goals of resettlement defined by this RPF and RAP(s) to be fully achieved.

1.5 Objectives of the RPF

The main objective of this RPF is to define overarching principles, procedures, actions, organizational structures and capacity requirements during resettlement, if such should be required, and its impact attributable to Project implementation. It provides the framework for individual RAPs under the Project.

RPF specific objectives are to:

- classify RS legal solutions in main events of involuntary resettlement, relocation and loss of assets, including legal and administrative procedures and assessment of compensation to be paid for loss of assets;

- compare them to WB resettlement policies and international good practices; and provide the way to bridge the gaps, if any;
- identify key institutions of RS, besides the PIU, involved during the EDGE Project implementation, including especially legally authorized state institutions implementing the procedures and safeguards of involuntary resettlement process;
- design monitoring and evaluation criteria in order to provide compliance with OP 4.12 international good practices, this RPF and any subsequent (A)RAP;
- present PAPs' eligibility criteria and compensation entitlement matrix according to type of loss assets;
- define the basic process of identification and evaluation of affected assets and the value of compensation to replace the loss of assets;
- provide instruments for prompt and effective compensation at full replacement cost for loss of assets or access to assets;
- describe mitigation principles, including fundamentals in order to minimize impacts on PAPs during Project implementation, including mitigation guidelines measures provided for vulnerable groups and women;
- define grievance process and complaint rights, process, bodies and procedures available to PAPs during the whole course of Project implementation, including feedback reporting;
- describe and provide directions for preparation, approval procedure, outlines and implementation process of RAPs or (A)RAPs, as relevant;
- specify requirement of public disclosure, disclosure of documents, public and local community involvement in all phases of the Project preparation, including RPF and RAPs;
- especially include public consultation guidelines in the PAP community during process of involuntary resettlement and Project implementation that may result in loss of assets;
- establish a gender-sensitive guidelines framework for resettlement in order to determine differential impacts since economic and social disruption do not result in equal hardship for women and men;
- specify internal monitoring activities during all phases of Project implementation, especially regarding resettlement issues, safeguarding legal and under this RPF defined process, including evaluation of the resettlement process and external monitoring and evaluation;
- present a Project Grievance Redress Mechanism (GRM) to provide people who believe are adversely affected by the project, an avenue to raise issues and concerns.

2 LEGAL FRAMEWORK

2.1 National legal framework influencing resettlement

Constitution of Republic of Serbia²

Passed in 2006 (the constitution was approved in the constitutional referendum of 2006, held from the 28-29th of October. It was officially proclaimed by the National Assembly of Serbia on November 8, 2006), Constitution of RS proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, and commitment to European principles and values.

Article 58 generally acknowledges guarantees of peaceful tenure of a person's own property and other property rights acquired by law. It states that right of property may be revoked or restricted only in public interest established by law and with compensation which cannot be less than market value. It is important to note that the Constitution of RS prohibits the payment of a compensation less than the "market value", but allows the payment over the established market value, which is an important provision for bridging gaps between Serbian laws and WB resettlement policies, as will be presented later in this document. The provisions of the Constitution also don't differ property (buildings etc.) constructed without a construction permit, a practice that became common during last 30 years in RS. The Constitution further proclaims that all human rights (including the right of property) and minority rights guaranteed by the Constitution shall be implemented directly.

Furthermore, Article 16 states that all general accepted rules of international law and ratified international treaties shall be an integral part of the legal system in the Republic of Serbia and applied directly. This provision allows direct implementation of WB OP 4.12. resettlement policies, provisions of this RPF and individual RAPs next to existing Serbian laws, and most important ways of bridging gaps between them if those WB resettlement policies and this RPF is considered to be an integral part of any potential Loan or Sponsor agreement with the WB, once approved, signed and ratified by the Parliament.

The Law on foundations of property law relations³

The Law on foundations of property law relations ("Official Gazette of the SFRY", No. 6/80, 36/90,"Official Gazette of the FRY", No. 29/96 and "Official Gazette of the RS", No.115/2005) stipulates fundamental provisions of property relations, including ownership rights substance, subjects of ownership rights, co-ownership and joint ownership rights, acquiring the right of ownership, right on yields emanating from owned thing, possession rights, ownership acquired by adverse possession, ownership relations deriving in situations when structures was built on someone else's land, protection of ownership rights, protection of possession, cessation of ownership rights, etc.

The Law on planning and construction⁴

² <http://www.ustavni.sud.rs/page/view/139-100028/ustav-republike-srbije> , last accessed on October 15, 2018

³ https://www.paragraf.rs/propisi/zakon_o_osnovama_svojinakopravnih_odnosa.html , ibid

⁴

<http://www.mgsi.gov.rs/sites/default/files/ZAKON%20O%20PLANIRANJU%20I%20IZGRADNJI%20PRECTEKST%202015.pdf>

The Law on planning and construction ("Official Gazette of the RS", No. 72/09 of September 3, 2009, corrected "Official Gazette No. 81/09 (Corrigendum), changed by Constitution Court of RS ruling 64/10 (CC), 24/11, 121/12, 42/13 (CC), 50/13 (CC), 98/13 (CC), 132/14 145/14 governs the following issues: the conditions and modalities of spatial planning and development, the development of general and detailed regulation plans, the development and use of construction land and the construction of facilities, predominant use of land when the land has multiple uses, public use of land and other issues of significance in the development of space, landscaping and use of construction land and the construction of facilities.

Building legalization law⁵

Building legalization law ("Official Gazette of the RS ", No. 96/15 dated November 26, 2015) regulates the conditions, procedure and manner for legalizing buildings, parts of buildings, auxiliary buildings and other buildings constructed without a building or construction permit. The custom of constructing complete buildings (houses, shops, even apartment buildings), or adding auxiliary buildings to existing, legal building (garage, additional floors on houses or rooms) without a construction permit became quite usual during the past 30 years. The governments over the years always maintained the intention to legalize all illegally constructed buildings, if constructed on own land and/or with consent of the owner, but most of the buildings have not yet been legalized. It is without any doubt that if the Project will have any resettlement impact, some of the assets will be buildings without building permits so provisions of this law can be important, but in those cases, the RPF, in terms of eligibility, shall prevail if more stringent.

The Law on Extra-Judicial Proceedings⁶

The Law on Extra-Judicial Proceedings ("Official Gazette of SRS", No. 25/82 and 48/88, amended "Official Gazette of the RS" No 46/95, 18/2005, 85/2012, 45/2013, 55/2014, 6/2015 and 106/2015) defines the rules by which courts decide on personal, family, property-related and other rights and legal interests, which are resolved in extra-judicial proceedings, pursuant to the Law. In accordance with this Law, the court in extra-judicial proceedings determines compensation for an expropriated property after it establishes the important facts and approves a decision which defines the type and amount of compensation. According to this Law, participants may conclude an Agreement about type and amount of compensation, and the court will then base its decision on their agreement, if the court finds that the agreement is not contrary to mandatory regulations.

The Law on Administrative procedures⁷

The law currently in effect was adopted in 2016 ("Official Gazette of RS No18/16 regulates the manner in which state institutions must act when deciding on rights, obligations or legal interests of individuals, legal persons or other parties, within the framework of administrative procedures. Decisions by administration bodies are approved in form of a decree, after completing the procedure as prescribed by this Law. The party has the right to appeal against the decision approved in first instance. Only the Law may prescribe that in certain administrative issues appeals are not permitted, if the protection of rights and legality is ensured in some other way. This Law is providing the legal framework for action of relevant Municipalities administration after the BoE submits the expropriation request.

The Law on State Survey and Cadaster⁸

⁵ https://www.paragraf.rs/propisi/zakon_o_ozakonjenju_objekata.html

⁶ https://www.paragraf.rs/propisi/zakon_o_vanparnicnom_postupku.html

⁷ https://www.paragraf.rs/propisi/zakon_o_opstem_upravnom_postupku-2016.html

⁸ https://www.paragraf.rs/propisi/zakon_o_drzavnom_premeru_i_katastru.html

The Law on State Survey and Cadaster ("Official Gazette of the RS" No 72/2009, amended on 18/2010, 65/2013, 15/2015, 47/17, 113/17, 27/18, 41/18) regulates the professional activities and affairs of the state administration related to land, buildings and other structures survey, real estate cadaster, records and registration of property, registration of possession, registration of illegal buildings and buildings legalized according to provision of the latest Building Legalization Law of RS, utilities cadaster, basic geodetic works, address register, topographic and cartographic activities, valuation of real estate, geodetic and cadastral information system.

2.2 Expropriation process in Serbia

The Law on Expropriation⁹ (passed in 1995 and enacted on January 1, 1996, amended in March 2001, amended again on March 19, 2009, and 2013 by the Constitutional Court ruling, and in 2016) enables government institutions to acquire property for projects that are deemed to be of public interest, while protecting the interests of all persons with legal title, whose assets are to be expropriated. The Law on expropriation does not use the term "involuntary resettlement", but instead uses the term "expropriation" and is based on the Governments eminent domain power. The law also enshrines the principle of fair compensation according to "market value" of the property instead of the "replacement value" used in WB OP 4.12.

Key provisions of the Expropriation Law

These are key provisions of the Law of Expropriation:

- Immovable assets (by Law generally defined as land, buildings and other construction structures) can be expropriated only after declaring public interest by law, or decision of the Government of RS. Public interest can be declared if construction of facility is intended for public utility infrastructure, education, public health, social welfare, culture, water management, sports, transport, power, national defense, local/national government needs, environmental protection, protection from weather-related damage, exploration for, or exploitation of, minerals, land needed for resettlement of people holding mineral-rich lands, property required for certain joint ventures, and housing construction for the socially disadvantaged.
- The Beneficiary of Expropriation (BoE) can be the Republic of Serbia, autonomous province Vojvodina, cities, the city of Belgrade, municipalities, public funds, public companies, companies that are established by public companies, as well as for companies with majority state capital founded by the above-mentioned state institutions.
- Expropriation can be complete or incomplete. Complete expropriation allows the BoE to obtain ownership over the expropriated property, while the ownership by the owner and other rights on that property cease to exist. Incomplete expropriation provides the BoE with specific easement rights on the land and structures, as well as the lease of the land for a definite period of time (not longer than three years in both cases). At the end of the easement or lease period full ownership rights over property are returned to the owner, and must be restored to condition prior to expropriation.
- Owners of immovable property partially expropriated are entitled to request expropriation of the entire property and the corresponding compensation, in case if expropriation deteriorated the economic situation of the property owner or made the remaining part of property useless or difficult to use - unviable. This request under the Law may be filed within two years from the completion of construction of the facility (for which expropriation was conducted), or within two years from the completion of works.

⁹ https://www.paragraf.rs/propisi/zakon_o_eksproprijaciji.html

- As a general rule, compensation for expropriated property is offered and paid in cash, if the Law doesn't state otherwise. But according to the same law, in the case of expropriation of agricultural land for the construction of line infrastructure facilities (roads, highways), suitable agricultural land of the same type and quality, or the corresponding value in the area and its surrounding area will be offered to owners of expropriated property. If the BoE is not able to offer appropriate agricultural land, the compensation is determined in cash. This is as a rule in partial conformity to the WB OP 4.12. and will be further addressed in the gap analysis.
- To lessee of socially or state-owned flats, or to persons with occupancy rights in expropriated residential building or apartment, BoE shall provide tenure rights (use, lease or occupancy rights) of same kind of another equivalent, social or state-owned property in the vicinity.
- The BoE will not be allowed to take possession of the Expropriated property before the day of legal validity of the decision on compensation, or before the date of conclusion of an agreement on compensation for expropriated property, unless the Law provides otherwise. But in cases of expropriation due to construction of facilities for power production, transmission or distribution of electricity, or for the construction of line infrastructure facilities, at the request of the BoE the possession of the expropriated property can be allowed before on the basis of the final decision on expropriation, provided that the BoE defined the basis for compensation under the provisions of the Expropriation law.

The Expropriation process

This is a step-by-step presentation of the expropriation process, as defined by the Expropriation law.

- The General assembly by enacting a law, or GoRS by its decision declares public interest for a certain development project. Public interest for expropriation can be declared only if there is a corresponding planning document. The request for the establishment of public interest for expropriation may be submitted by a legal entity that, under the provisions of this Law, can be the BoE. The Government shall issue its decision within 90 days.
- Expropriation process starts when the BoE submits the expropriation request to the relevant municipality. The request, amongst other data, must contain exact specification of owners and properties for which expropriation is proposed, and evidence on secured funds within the budget, or arrange for a bank guarantee, securing the payment of compensation, in accordance with the regulations governing public finances.
- Prior to issuing a decision on expropriation, the relevant authority shall hold a hearing allowing the owners of immovable property to voice all facts of importance for the expropriation of property. If all conditions are met, the expropriation decision will be issued.
- The BoE is obligated to submit to the municipal administration a written compensation offers within 15 days of the legal validity of expropriation resolution based on evaluation of assets made by proper authority.
- The municipal authority will without delay supply a copy of the offer for compensation to the owner of the Expropriated property, and will collect information that may be of importance for the compensation from administrative and other institutions and organizations. The compensation agreement cannot be in contradiction to the Law on Expropriation provisions.
- If Compensation agreement is not reached within two months from the date of legal validity of Expropriation resolution, municipal administration shall pass without delay all documents to the competent municipal court to determine and decide on the compensation. The process can also be initiated by the owner of the Expropriated property before the same court.

2.3 The WB policy on resettlement (OP/BP 4.12)

All WB financed projects involving involuntary resettlement are subject to OP 4.12¹⁰. The policy describes the procedures and instruments for eliminating negative economic, social and environmental issues that may arise. OP 4.12 is triggered not only in cases of physical relocation, but any loss of land resulting in relocation or loss of shelter, loss of assets or access to assets and loss of access to income sources and means of livelihood.

The overall objectives of OP 4.12 are the following:

- (a) Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- (b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs
- (c) Displaced persons should be assisted to improve their former livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

OP 4.12 distinguishes the following three categories of persons for eligibility for compensation and assistance:

- (d) Persons with formal rights to land (including customary and traditional rights recognized under the laws of the country).
- (e) Persons who do not have formal rights to land at the time the census begins but have a claim to such land and assets - provided that such claims are recognized under the country laws or become recognized through a process identified in the specific resettlement plans.

Persons without recognizable legal right or claim to the land they are occupying.

2.4 GAP analysis

The objectives of OP. 4.12 are clear in their aim to avoid involuntary resettlement caused by land acquisition measures wherever feasible and if not possible to apply such compensation principles for impacts on all PAPs and to restore their livelihoods at least to pre-project level. In general, the institutional framework for expropriation in Serbia is not completely in compliance with the OP. 4.12, and the most evident differences relate to the requirements to compensate at replacement cost for land vis-à-vis the national requirement of compensating land at market value without payment of taxes and fees as part of compensation package. Additionally, the national law includes decrease of value for structures by depreciation and it does not recognize informal users, occupiers and settlements. It does not require a project specific grievance redress mechanism, a social impact assessment, gender disaggregated data and assistance to vulnerable persons.

The table below provides an overview of specific gaps between the national expropriation law vis-à-vis OP 4.12 and the recommendations for remedy and/or mitigation in order to comply with the OP 4.12 requirements.

¹⁰ <https://policies.worldbank.org/sites/ppf3/PPFDocuments/090224b0822f89db.pdf>

Table 1. GAP analysis

Subject	RM laws	WB OP 4.12 and good international resettlement standards	Gaps and measures for bridging the gaps
Resettlement instruments, census and social impact assessment	The only documents prepared are part of construction plans, the Expropriation study is simply a database of re without tackling socio-economic issues.	Resettlement plans such as RPF or RAP should be prepared. Census and socioeconomic survey should be conducted to identify (i) PAP, (ii) their demographic and socioeconomic characteristics, (iii) magnitude of losses and extent of displacement, and (iv) information on vulnerable groups or persons.	This RPF and a site-specific RAP, if necessary, will be developed per WB OP 4.12, in addition to national legal requirements. Census will be conducted to identify persons who will be affected by the project and assess their characteristics, including standard of living, level of vulnerability, establishing baseline conditions for monitoring and evaluation purposes, and to set a cut-off date.
Avoidance and minimization of involuntary resettlement	There are no specific requirements to minimize involuntary resettlement	Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs. The Borrower will consider feasible alternative project designs to avoid or at least minimize displacement	The PIU will seek to minimize physical and/or economic displacement. All alternatives and measures explored to avoid or minimize negative impact will be recorded in the internal periodical (monthly or quarterly) report required by the financing institution.
Public consultations	The formal owners are contacted only at the very process of expropriation there is no requirements for public consultation apart from the spatial planning phase under the Planning and construction law.	Meaningful consultations with affected persons and communities, local authorities, and other stakeholders need to be carried out during the preparation and implementation of resettlement instruments.	National legislation does not require public consultation with affected persons and communities at the extent and reach of those envisaged by WB OP 4. 12.. The PIU shall disclose RPF and RAP (if applicable) to PAPs and stakeholders and conduct consultation meetings as described in the according chapter of this RPF.
Cut-off date for eligibility and census	The RS Expropriation Law stipulates that after the date of submission of the proposal for expropriation by the expropriation beneficiary to the relevant municipality. all investments made by owners after receiving information about the Expropriation proposal will not be compensated, except the necessary expenses.	Normally, the cut-off date is when census begins but could also be the date the project area was delineated, prior to the census, provided that there has been an effective public dissemination of information on the area delineated, and systematic and continuous dissemination subsequent to the delineation to prevent further population influx	The cut-off will be date of beginning of the census. This will be publicly announced and published by the BoE in local newspapers, informing all owners and users of the initiation of the expropriation process, the cut-off date and the contact persons who may be contacted by PAPs for further information.

Subject	RM laws	WB OP 4.12 and good international resettlement standards	Gaps and measures for bridging the gaps
Eligibility for Compensation	The Expropriation Law recognizes only formal title holders and holders of rights recognizable under national laws (factual ownership).	WB OP 4.12 also recognizes those who have no recognizable legal right or claim to the land they are occupying on Cut-off-Date are also eligible for rehabilitation assistance and compensation for loss of non-land assets at replacement value.	Compensation and assistance to PAPs without legal right or claims will be made per principles and entitlements provided in the entitlement matrix of this RPF, if they are present in the project affected area at the time of the cut-off date. Asset inventory and valuations of their affected properties will be conducted and all measures will be recorded in the internal periodical (monthly or quarterly) project progress report.
Valuation methodology for compensation for property	Compensation for loss of properties and assets should be at least equal to the market price. Depreciation are deducted from compensation (or included by decreasing the market price value appraisal). The Expropriation Law does not specifically mention compensation for the costs of any registration fees and transfer taxes.	Compensation should be equal to full replacement cost without depreciation.	Compensation and assistance to PAPs will be at least equal to replacement value as provided in the entitlement matrix of this RPF
Escrow accounts	There is no requirement to have an escrow account, but as a principle compensation is always available	If there are significant difficulties related to the payment of compensation to particular affected persons, on an exceptional basis, with prior agreement of the Bank, the PIU may deposit compensation (plus contingencies) into an interest-bearing escrow or other deposit account.	Compensation funds as required by the RAP/RPF including contingencies, can be deposited into interest-bearing accounts, if necessary, however only under exceptional circumstances and with prior approval from the WB.
Transitional Support	The Expropriation Law doesn't envisage any form of transitional allowance.	Displaced persons should be receiving support after physical displacement for a reasonable duration of time likely to be needed to restore their livelihood and standards of living.	In a highly unlikely event that physical displacement is unavoidable, the PIU will ensure that displaced persons receive transitional support per entitlement of this RPF.

Subject	RM laws	WB OP 4.12 and good international resettlement standards	Gaps and measures for bridging the gaps
Loss of benefits and income for workers and employees	No particular legal provision	In addition to compensation at full replacement cost, displaced persons must be assisted in their efforts to improve, or at least restore, their livelihoods and living standards.	Each site-specific RAP/ARAP shall include measures and design adequate support and assistance commensurate to the impact, as a way to bridge the gap, and all measures must be demonstrated and documented to the satisfaction of the WB.
Gender aspects	Men and women have equal rights in the Republic of Serbia, including the possibility to have formal legal rights on properties.	Women's perspectives must be obtained through consultation and their interests factored into all aspects. Documentation of ownership or occupancy and compensation should be issued in the names of both spouses wherever possible.	Particularly in some rural areas, women's participation in consultations may be limited. Women only consultation may be held as relevant. Documentation of ownership or occupancy and compensation should be issued in the names of both spouses
Grievance Redress Mechanism (GRM)	There is no requirement to have grievance redress mechanism apart from the institutional ones	Appropriate, affordable and accessible procedures to address concerns and grievances must be established; such grievance mechanisms should consider the availability of judicial recourse and community and traditional dispute settlement mechanisms.	The PIU will establish a Project specific and impact commensurate Grievance mechanism as described in the RPF.
Monitoring & Evaluation	No specific monitoring procedures are required by RS laws to be implemented by the BoE.	The Borrower is responsible for adequate monitoring and evaluation of the activities set forth in the resettlement instruments.	The PIU will be responsible for monitoring in line with the requirements set out in the RPF and any subsequent RAP.

3 RESETTLEMENT COMPENSATION STRATEGIES APPLICABLE TO THE EDGE PROJECT

3.1 Key principals

This RPF committed key principles which will govern all resettlement activities by the PIU and be incorporated into all site-specific RAP/ARAP. The principles for the impacts identified could be briefly summarized as follows:

- Resettlement and compensation of Project-Affected People will be carried out in compliance with Serbian legislation and World Bank's Policies and Procedures on involuntary resettlement OP 4.12, where the more stringent requirement will take precedence
- All Project Affected People (PAP) will be compensated for their losses at replacement cost to allow restoration at pre-displacement level,

The RAP/ARAP implementation and outcomes will be monitored and evaluated by the PIU, and all measures must be demonstrated and documented to the satisfaction of the WB, and be recorded in the internal periodical (monthly or quarterly) report required by the financing institution.

3.2 The cut-off date

The date of beginning of the Census serves as the Cut-off date. Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and woodlots) constructed after the cut-off date will not be compensated.

A Moratorium notice informing the general public of the declaration shall be made to serve as the cut-off date for eligibility to entitlements.

In addition, at the beginning of the Census, every individual surveyed shall be informed about the moratorium date and the respective consequences of commencing activities after the date of Census.

3.3 Eligibility criteria and entitlement matrix

The unit of entitlement is any individual eligible to receive compensation or rehabilitation benefits. Determination of unit of entitlement is in lieu with developing and identifying the census and inventory of all assets impacted by the Project to allow full compensation in line with the Entitlement Matrix. All PAPs identified prior to the cut-off date shall be entitled to compensation, according to the compensation principles of the law, this RPF and OP 4.12 whereas the more stringent in requirements shall prevail.

Project affected persons are defined to include the following categories:

- Project affected persons, with formal title, who lose all or part of their land;
- Project affected persons, with formal title, who have immovable property with or without building permissions on the land to be expropriated;

- Project affected persons with formal title over businesses that are affected by the loss of all or part of the land on which businesses are located;
- Project affected persons with formal title over animal husbandries and agricultural processors that are affected by the loss of all or part of the land on which they are based;
- Project affected persons with formal title of tenancy on private or public land;
- Project affected persons with formal title over land that will be needed during construction on a temporary basis;
- Project affected persons without formal title on affected land or businesses but their livelihoods are directly dependent on the affected land or businesses (e.g., those working on affected agricultural land or working in the affected businesses);
- Project affected persons without formal title of ownership or use but who have established usage of public or private land by investing in immovable objects, crops, woods, trees, fruit bearing trees, vineyards, the age of crops, and the time needed to reproduce them; and Any affected community facilities will also be reconstructed or necessary support will be provided for their relation to the community losing access to such common facilities.

3.4 Entitlement matrix

The entitlements for different categories of impact and PAPs shall be as per the Entitlement Matrix as adopted in this RPF.

Table 2: Entitlement Matrix

Affected Categories	Eligible people	Entitlement
Loss of land holding (partial or whole) -	Owners with full legal ownership; owners with recognizable claim to the land they occupy on cut-off-date	Cash compensation based on replacement cost including all taxes
Unviable, redundant parcels of land/structures	Owners with full legal ownership; owners with recognizable claim to the land they occupy on cut-off-date	If a remaining parcel of land after expropriation is not economically viable, it will be acquired and compensated at the same rate as the land acquired for project purposes.
Structures and installations on the land (barns, shacks, fences, etc.)	All affected people without regard to legal status of asset ownership	The replacement cost for any investment made, and the value of time invested in construction, without depreciation. Salvage materials will be provided to affected people

Affected Categories	Eligible people	Entitlement
Residential Houses	All affected people without regard to legal status of asset ownership	Partial demolition without physical relocation: cash compensation at replacement cost. Salvage materials will be given to affected people. If physical relocation (highly unlikely) is necessary, cash compensation sufficient to restore a comparable residential structure plus moving cost, administrative taxes, and transition allowance. Transitional allowance shall be a one-time cash compensation
Crops (inc. nursery)	All affected people without regard to legal status of asset ownership	Compensation for lost crop or nursery plants at replacement value
Fruit plants, vineyards, and orchards (without regard to age)	All affected people without regard to legal status of asset ownership	Compensation equivalent to the cost to raise a replacement vineyard or orchards, including the value of time needed to reproduce replacement vineyard or orchards, and compensation for lost yields till trees reach full productivity
Temporary land occupation	Owners with full legal ownership; owners with recognizable claim to the land they occupy on cut-off-date	The market rental price for the duration of the lease. The land should be returned to the project affected person, in the same condition as it was taken and improvements should remain
Lessees of Public or State-owned properties	Owners of Public or State-owned properties	Provision of the use of other corresponding Public or State owned equivalent property with the rights of a lessee for an equivalent period of time
Loss of job or non-agricultural income	All affected people	Temporary loss of income will be compensated as a one-time cash compensation equal to net income for 6 months based on tax report. In case if tax report is not available, equivalent to the sum of minimum wage over six months. In case of permanent income loss, transitional allowance on one time basis will be paid to assessed on reasonable time needed to restore livelihood means + Training for alternative jobs if possible + Priority in employment on the Project, if possible and on a case by case basis (In accordance with social assessment processed in (A)RAPs)
Illegal users of public and private land or property squatters		If illegal users on land, and livelihood is land based, Compensation for all improvements on land (such as irrigation). Compensation will be paid at replacement cost: market price for improvements + labour and time to install improvements at market price + costs of equipment relocation and installation, if any + transitional allowance and Replacement land for lease, if possible, of similar state-owned property
Vulnerable groups (affected households with many dependents, household with unemployed head, households with disabled, poor households)		For this group, they will be given additional financial assistance to ensure that they will be no worse off after the project and can maintain and restore their livelihoods.

4 PREPARATION OF INDIVIDUAL RESETTLEMENT INSTRUMENTS

4.1 Social screening and RAP development

Preparation of individual resettlement instruments will follow after the screening has been completed to determine whether the subproject would have the potential to cause significant adverse impacts on the society, consequently the appropriate safeguard instruments and mitigation measures to manage those impacts.

Safeguards screening usually consists of checking and identifying social impacts/ risks/ opportunities, as well as identification of measures to mitigate adverse impacts, if any, associated with the proposed sub projects, (The Social Screening Form is provided in Annex 2).

While preparing any operations or projects for financing, screening will be conducted to screen for social impacts and plan any required mitigation measures. The screening process and its findings as well as the proposed mitigation measures will be documented as part of the project/subproject package. The following guidelines, codes of practice and requirements will be followed in the selection, design and implementation of any operations financed under the activities of the Project. Screening of activities will be carried out by the Environmental & Social Specialist to be employed at PIU-level. The screening reports will be endorsed by the Head of the PIU and submitted to the World Bank.

The screening will rely on the following criteria and will aim to faithfully identify whether the proposed Sub-Project will have adverse impacts on:

- (i) shelter;
- (ii) assets or access to assets;
- (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location;
- (iv) land
- (v) business
- (vi) access to education and health
- (vi) vulnerable persons and households
- (vii) community health and safety

The screening will identify Persons with formal rights to land and assets (including customary and traditional rights recognized under the laws of the country). The screening will also identify Persons who do not have formal rights to land but have a claim to such land and assets at the time of the cut-off date. The Screening will not rely on the use and analysis of secondary data readily available, but will require a walk-over survey as a validation that the secondary data provide true, reliable and accurate accounting of the social environment. In cases when after the walkover survey still no conclusive decisions can be made further efforts will be made through key informant interviews, focus group discussions and other adequate methodology. If the screening has found that such Persons as describe above are present on project affected land, a Resettlement Action Plan (RAP) or an abbreviated RAP, as applicable, will be prepare per Resettlement Policy Framework (RPF).

Based on this RPF, considering the extent of impact in terms of land acquisition and resettlement, site specific Resettlement Action Plans (RAP) or Abbreviated Resettlement Action Plans (ARAP) will be prepared. An ARAP can be considered to mitigate adverse effects, compensate losses, and provide development benefits to

persons and communities affected by an investment project in cases when less than 200 persons are affected by the Project and resettlement impacts are minor.

The objective of the (A)RAP shall be to specify what procedures to follow and what actions to take to acquire land and compensate affected people in line with this RPF. Any site-specific RAP shall be based on up-to-date and reliable information about (a) the proposed resettlement and its expected impacts on the displaced persons and other adversely affected groups, and (b) the legal issues involved in resettlement. A site-specific RAP or ARAP, shall include at minimum the following:

- ✓ Description of the project;
- ✓ Identification of the project area and activities that cause physical or economic displacement;
- ✓ Alternatives considered to avoid or minimize resettlement;
- ✓ Socio-economic baseline assessment including census, demographic and socioeconomic characteristics of affected people;
- ✓ Expected scale and scope of impact;
- ✓ Entitlements;
- ✓ Legal and institutional arrangements;
- ✓ Implementation procedures including monitoring mechanisms;
- ✓ Grievance Redress Mechanism;
- ✓ Consultation with affected people during and implementation of RAP/ARAP;
- ✓ Cost and budget.

4.2 RAP approval

Activities on the preparation of site-specific RAPs will be disclosed in the way to enable significant participation of PAPs. That assumes the phase of preliminary preparations, disclosure of preparations for population census, disclosure of census results while respecting privacy of personal information, disclosure of socio-economic baseline assessment, as well as disclosure of RAP drafts. The purpose of public disclosure and discussions is to ensure meaningful participation of PAPs in the process of preparation, implementation and monitoring of resettlement instruments.

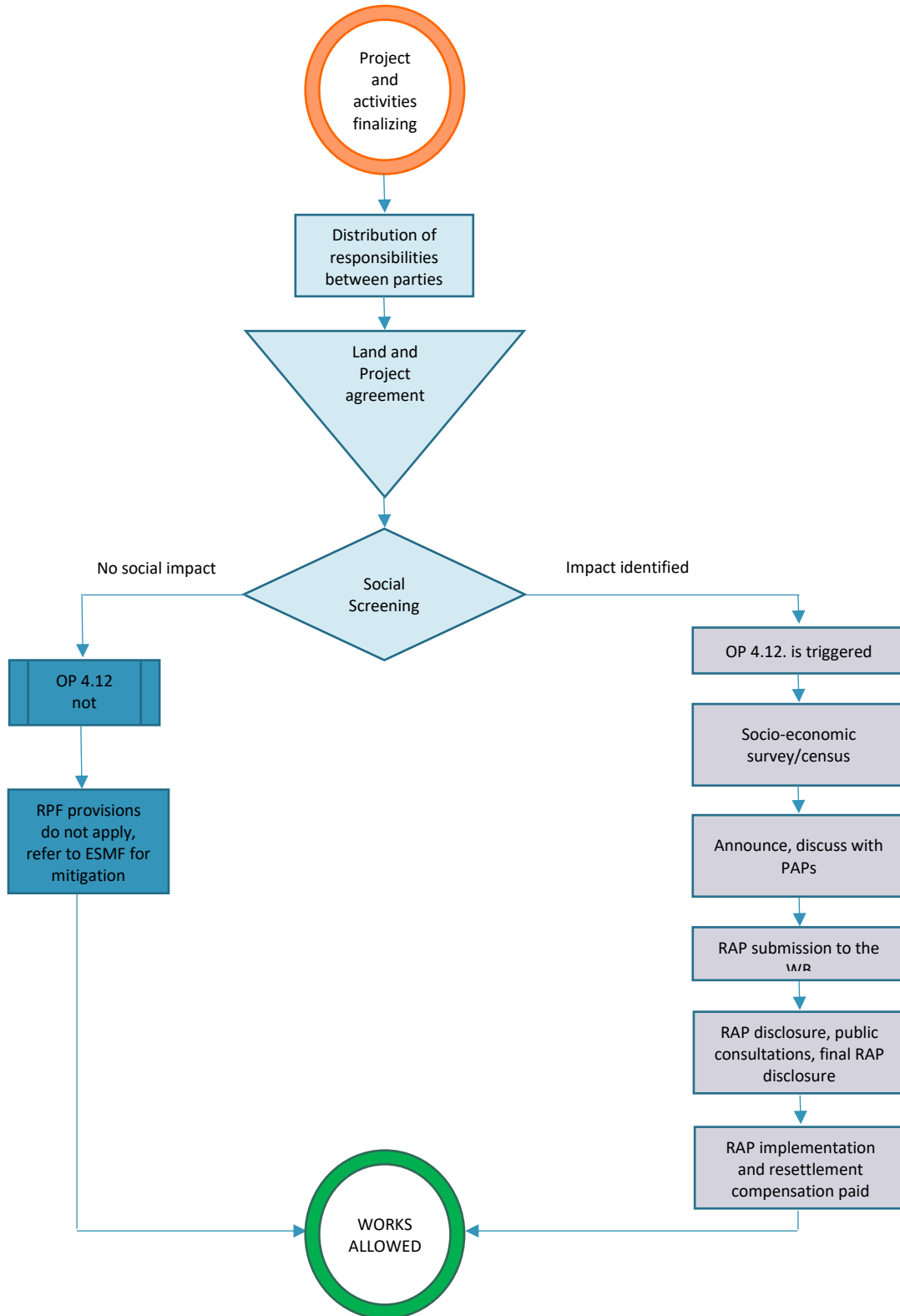
The first draft of RAP shall be submitted to the World Bank for review and clearance. After it has been cleared, it will be disclosed (in English and in Serbian language) by the PIU in areas accessible to affected people, local newspapers in the community(s) affected by the Project and on internet portal of the PIU, followed by public consultation with local communities and stakeholders. PIU shall also issue a summarized information contained in the RAP for public disclosure to ensure that affected people understand the compensation procedures and know what to expect at the various stages of the project (for example, when an offer will be made to them, how long they will have to respond, grievance procedures, legal procedures to be followed if negotiations fail). Public consultation outcome shall be documented and reported with the final document of the RAP and sent to WB for "No Objection". Upon receiving the "No Objection", final RAP will again be disclosed in areas accessible to affected people, published in local newspapers in the community(s) affected by the Project and on internet portal of the PIU, and made available throughout the Project, RAP implementation and process of resettlement.

4.3 RAP implementation

No activities on construction works can commence until and unless compensation has been paid, or appropriate compensation set aside on an escrow or similar account, or replacement property administered to PAPs, or court procedure initiated to determine the compensation in case no amicable settlement is reached.

Implementation of RAPs is an obligation of the Borrower through the PIU. The PIU shall monitor overall implementation, collaborate with the municipalities in which territory the constructions are taking place, collaborate with contractors and disclose information to PAPs and communities.

Figure 1. Steps in (A)RAP preparation



5 CONSULTATION AND DISCLOSURE

5.1 Public consultation

The PIU will establish an ongoing relationship with the affected communities from as early as possible in the project planning process and throughout the life of the Project. The engagement process will ensure their meaningful consultation in order to facilitate a common understanding of the nature and duration of the impacts; informed participation on matters that affect them directly; proposed mitigation measures; the sharing of development benefits and opportunities; and implementation issues. Individual meetings may be held with PAPs regarding specific cases, including when needed upon request by PAPs.

All documents prepared as part of the implementation of this RPF, i.e. the RPF, any subsequent (A)RAP, will be disclosed in Serbian and English language, and made available for a public insight no later than 7 days prior to public consultations and sufficient time shall be left for submitting remarks after public consultations. All public consultations shall be announced through local newspaper and on internet portal of the PIU.

Project information, and Information about the GRM will be disseminated in Serbian and English.

5.2 Disclosure of documents

All documents will be disclosed in Serbian and English language. Documents must be available to the public throughout duration of the Project including its evaluation. Versions in Serbian (or/and additional languages of the local community) will be published on the web-site of the PIU and of relevant local municipalities. All documents shall be presented to PAPs in the process of land acquisition, particularly to vulnerable groups, and project impact on their property and their rights must be explained. Hard copies of the documentation shall be available in the affected municipalities. The PIU is responsible for all disclosures of the documents.

5.3 Outcome of the public consultations

Disclosure of draft RPF document finished on February 07, 2019, when the public meeting was held in Kragujevac, at the big hall of the City of Kragujevac Assembly, Trg slobode 3.

A total of 16 participants attended the public consultation meeting in Kragujevac, including representatives of the OITeG, representatives of all relevant departments of the City of Kragujevac administration, public utility companies and the employees involved in the expropriation process. It was explained that RPF document had been prepared out of precaution enabling implementation of subcomponents if adverse social impacts should be encountered after all. It has been explained that physical investments causing loss of private lands, loss or damage to private assets such as fences, trees, standing crops, structures, etc. (however unlikely), will be allowed subject to implementation of adequate mitigation measures as designed in the Resettlement Policy Framework (RPF). The screening criteria and procedures will provide a project brief for the investment proposed for the project funding and shall identify what conditions precedent the subcomponent is to meet in terms of preparation of site-specific resettlement and/or livelihood restoration instruments.

After the presentation the floor was handed to the participants to engage in questions and seek clarifications of the presented document. During the public consultations, the following topics have been discussed:

- Potential impacts of the future DRC on the environment;
- Responsibilities of the City of Kragujevac administration in the future environmental protection related tasks;
- Issuing of permits in general.

Also, representatives of the City administration presented the progress of the expropriation process.

There were no comments, remarks or complaints related to issues presented in the RPF, and no socially related issues were raised.

Respecting social impacts of this project, Project presenters informed all participants that under this project, any physical investments that will cause loss of private lands, loss of damage to private assets such as fences, trees, standing crops, structures, etc., will be allowed subject to implementation of adequate mitigation measures as designed in the Resettlement Policy Framework (RPF). The screening criteria and procedures will provide a project brief for the investment proposed for the project funding and shall identify what conditions precedent the subcomponent is to meet in terms of preparation of site specific resettlement and/or livelihood restoration instruments.

During the time aimed for insight no comments nor questions were received.

6 GRIEVANCE REDRESS MECHANISM

6.1 Beneficiary feedback and grievance redress

A Project Specific Grievance Mechanism shall be designed for the Project. The Central Grievance Desk (CGD) shall be at the level of the PIU within the OITeG as the main implementing entity. The CGD shall serve as both Project level information center and a grievance mechanism, available to those affected by implementation of all Project sub-components throughout the Project Cycle. The CGD will be responsible to address grievance received from:

- Person who believe are directly or indirectly affected by the project; and
- Residents living in the affected municipalities,

The CGD shall be established prior to commencement of any activities under the Project. The PIU will inform local communities during the preparation of specific investments that cause physical or economic displacement, the role and existence of the CGD its function, the contact persons and the procedures to submit a complaint in the affected areas through the following means:

- distribution of brochures to affected communities; and
- distribution of notices on notice boards in areas frequently visited by local people and websites of respective municipalities.

Efforts will be made to adequately inform any vulnerable group or persons ensuring the CGD if needed is easily accessible to such persons.

The CGD shall be designed to be accessible, without cost to the complaint, effective, efficient and not precluding any official administrative or judicial legal remedy available under the law.

Whether adequate dissemination of information has been made will be verified by the Environmental & Social Consultant hired by the PIU through simple feedback questionnaires. The aim of the survey is to assess the effectiveness of information sharing and propose mitigation measures if the results should not show full transparency and accessibility to the CGD.

Any grievance can be brought to the attention of the CGD anonymously, personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the address of the PIU which will be known once established. Until then, Grievances can be addressed to the OITeG, 11 Nemanjina Street. The Grievance registration form is provided in Annex 1.

6.2 Grievance administration

Any grievance shall follow the path of the following mandatory 7 steps: Receive, Assess and assign, Acknowledge, Investigate, Respond, follow up and close out.

Once logged the CGD shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 3 days from logging it will acknowledge that the case is registered and provide the complainant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The CGD will investigate by

looking into the facts and circumstances through interview with all parties involved and confer with relevant stakeholders. Once investigated, and depending on the severity and type of grievance, the provisional decision shall be discussed with the complainant in the timeframe of 10 days after logging the grievance. Unilaterally announcement shall be an exception. The final agreement, once reached through consultation with grievant, should be issued and grievant be informed about the final decision not later than 20 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected it is important to document the result, actions and effort put into the resolution, close out the case. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures, as made available under the Serbia national legal framework. Any grievance can be taken to the authority of the judicial bodies at any time after logging. Logging a grievance with the CGD does not preclude or prevent seeking resolution from an official authority, judicial or other, as provided by the Albanian legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the CGD will investigate the grievance and within 20 days from logging the grievance, issue final decision that will be disclosed on the website of the PIU. Closing out of the grievance occurs after the implementation of the resolution has been verified. Flowchart below shows usual grievance life-cycle:

Figure 2: Grievance flowchart

DAYS	ACTIONS	Responsible agency/ officer/ person
0	Receive Grievance	PIU / CGD
3	Acknowledge Receipt	
5	Assess and Assign	
10	Investigate and discuss with Claimant	
20	Decide and inform Claimant	
30	Follow up and verify implementation of resolution	
32	Close out	
At any time	Access to judicial procedures if final agreement cannot be reached amicably	

The CGD shall keep a grievance register log that will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the register with the following information at minimum:

- description of grievance,
- date of receipt acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures), and

- date of resolution and closure / provision of feedback to the complainant

7 MONITORING AND EVALUATION

7.1 Institutional monitoring

The PIU will also keep a database of resettlement and expropriation with all information about persons and property, with all cases of expropriation and a detailed list of all completed phases (submission of expropriation proposition to the competent municipality, compensation offer, agreements regarding the compensation, compensation payment, and payment of assistance during relocation etc.).

Some institutions have additional obligations in monitoring the resettlement process:

Table 3: Institutional responsibilities

Task	Responsibility
Disclosure and arranging public consultations on the RPF	OITeG
Information disclosure to all PAPs about the procedure of the beginning of expropriation and during all phases of expropriation	PIU and LM
Communication and consultation with PAPs	PIU and LM
Activities prior to commencement of works	PIU and LM
Providing assistance during resettlement	PIU and LM
Compensation payment	BoE and CFU on PIU motion
Grievances management	PIU
Monitoring and reporting on expropriation and resettlement	PIU / External consultant
Monitoring and reporting after commencement of works	Contractor

7.2 Monitoring of resettlement process

The PIU will conduct internal periodical (monthly or quarterly depending on the length of land acquisition processes) monitoring so that efficiency of the expropriation process and level of satisfaction of PAPs can be assessed.

Indicators for implementation of monitoring are as follows:

- Number of public discussions and consultations on the RAP;
- Number of completed land acquisition cases compared to expected total number;
- Number of PAPs compensated compared to the expected total;
- Amount of compensation paid compared to the expected total;
- Number and type of assistances provided to vulnerable groups compared to total; and
- Number and type of grievances, including legal actions arising from expropriation (submitted cases, resolved cases, time needed for their resolution).

The PIU shall monitor the implementation of the resettlement process both through internal, official institutional arrangements, as well as by a periodical independent external consultant, to be appointed by the Projects Promoter. The external monitoring and evaluation consultant may be appointed during RAP/ARAP preparation, if necessary, based on consultation with the World Bank. A RAP/ARAP completion report will be prepared and submitted to the World Bank within 2 months of the RAP/ARAP completion. The report should verify that all entitlements have been delivered in line with the site-specific (A)RAPs. In addition, the report should evaluate whether the mitigation actions prescribed have had the desired effect. The socioeconomic status of the affected population should be measured against the baseline conditions of the population before displacement, as established through the census and socioeconomic baseline studies.

Resettlement independent monitor should also do a sample check on the grievance process to ensure that it is satisfactory and that the PAPs are getting their grievances addressed. Basically, they can verify at random the report of the PIU on grievance monitoring.

8 INSTITUTIONAL ARRANGEMENTS

8.1 Institutions responsible for Project implementation

For this Project a project implementation unit will be established hosted by the OITeG to carry out planning, implementation and monitoring activities. Fiduciary management including procurement and financial management shall be within the responsibility of the **Central Fiduciary Unit - CFU** (responsible for procurement and financial management) housed under the MoF as per the agreement reached between the MoF and the OITeG. The CFU has Three (3) consultants, i.e. CFU Director, Procurement Specialist, and Financial Management Specialist and will be financed from the Project.

8.2 Key institutions in process of resettlement

The resettlement process involves the Government of RS, the Beneficiary of expropriation, the tax authority, accredited valuation experts, the local Governments and the Relevant Courts in cases there is a dispute. An overview of all institutions is presented below. The in depth assigned responsibilities and arrangements for implementing the requirements of this RPF and each site-specific RAP/ARAP shall be covered in the RAP/ARAP itself.

Table 4: Institutions involved in during land acquisition / resettlement

Institution	Key responsibility during resettlement
General assembly of RS	Declares public interest by law
Government of RS (GoRS)	Declares public interest for expropriation (if not done by law as above)
PIU	<p>Applies and coordinates all resettlement activities under this RPF and individual RAPs</p> <p>Appoints a chief resettlement officer to monitor the implementation and report on social components of the Project, particularly implementation of RPF</p> <p>Discloses the Cut-off date in public announcement</p> <p>Prepares and discloses RPF, RAP and all other documents</p> <p>Holds public consultations in all Project phases</p> <p>Engages with relevant stakeholders</p> <p>Establishes and administers the CFD grievances of PAPs and stakeholders;</p> <p>Monitors and evaluates process of resettlement reports to WB on all issues under this RPF</p> <p>Monitors the process of temporary land occupation until the land is given back to their owners in accordance with this RPF</p>
Ministry of Finance (MoF)	Borrower
Tax administration offices (decentralized to municipality units, but under MoF)	Provides assessment of market value of agricultural or construction land
Local-Self Governments, including its administration	Local municipalities govern the expropriation process and steers the expropriation process (Department of property affairs)
Ministry of Agriculture and Environmental Protection	Provides information about available replacement land
Republic Geodetic Authority, State Cadaster of immovable property, decentralized units	<p>Provides official information on all immovables, including land, structures, houses, etc.</p> <p>Provides official legal information on owners of immovables</p> <p>Provides information on possessors of immovable property</p> <p>Annotation of expropriation process</p> <p>Executes legal title changes of immovable property owners after land acquisition, expropriation etc.</p>
Relevant municipal courts	Determines fair compensation if amicable agreement has not been reached

9 BUDGETING IMPLICATION AND FUNDING

In general, the cost burden of compensation will be borne by the Government of Serbia and budgeted within the Budget for the upcoming fiscal years. Costs for the implementation of this RPF include categories: (a) administrative costs including cost associated with expropriation (if necessary), and (b) compensation for land acquisition, and asset loss, including transitional and any other allowance as necessary.

The rough estimated cost is 2 204 000, 00 RSD (18.678 EUR) which includes all categories of cost.

The overall responsibility for resettlement and expropriation for the Project is under the PIU. The financial responsibility for the land acquisition, including the compensation to be paid, resettlement costs, etc., lies with the Serbia Government, based on this RPF and, the Loan Agreement signed between the WB and the Government of Serbia. This RPF and the Agreement stands above the law on expropriations and will define measures that will be applied when there exist gaps between the World Bank's OP 4.12 and relevant laws.

ANNEX 1: A COMPREHENSIVE EXCLUSION LIST

Reference No: _____

Full Name

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

First name _____

Last name _____

- I wish to raise my grievance anonymously
 I request not to disclose my identity without my consent

Contact Information

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

By Post: Please provide mailing address:

By Telephone: _____

By E-mail _____

Preferred Language for communication

- Serbian
 Other indicate _____

Description of Incident or Grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of Incident/ Grievance

- One time incident/grievance (date _____)
 Happened more than once (how many times? _____)
 On-going (currently experiencing problem)

What would you like to see happen to resolve the problem?

Signature: _____

Date: _____

Please return this form to: [name], [company name],
Address Nemanjina 22-26: Tel.: _____ or E-mail: _____@_____.com .

ANNEX 2: SOCIAL SCREENING FORM

SOCIAL SCREENING FORM AND TRIGGERS FOR SUB PROJECTS

This screening report shall comprise of the screening form, ownership evidence and pictures from the walkover survey.

Name of Sub project:

Location:

Type of Activity and Procurement Package as assigned in the Procurement Plan:

Nature of Project:

Size/Scale:

Project Implementing Agency:

Description of Project Surroundings:

Screening indicators related to Land acquisition, assets and access to resources

		YES	NO
Type of activity – Will the sub project:			
1	Require that land (private) to be acquired (temporarily or permanently) for its development		
2	Affect more than 200 persons		
3	Use land that is currently occupied or regularly used for productive purposes (e.g. gardening, farming, pasture, fishing locations, forests)		
4	Physically displace individuals, families or businesses		
5	Result in the temporary or permanent loss of crops, fruit trees or household infrastructure		
6	Result in the involuntary restriction of access by people to legally designated parks and protected areas		
7	Result in loss of livelihood		
8	Have negative impact to any vulnerable individuals or groups		
9	Have negative impact to informal side road shops, traders or any nomadic type of commercial activity		

10	Provide the opportunities to improve the informal side road shops, traders or nomadic type of commercial activity		
11	Impact community Health & Safety		
12	Impact internally displaced persons or refugees		
13	Disrupt access to health care and education		

If any of the boxes 1 through 9 are ticked YES the OP.BP 4.12 will be triggered and site specific instruments in line with the RPF will be prepared.

If any of the boxes 10 through 13 are ticked YES commensurate mitigation measures shall be designed through the site specific ESMP.

CERTIFICATION

We hereby certify that we have thoroughly examined all the potential adverse effects of this sub project. To the best of our knowledge, the sub project does not avoid /avoids all adverse social impacts.

ANNEX 3: MINUTES OF MEETING

1. Background

The Enabling Digital Governance in Serbia Project (EDGE) aims to support the Government of Serbia in improving access, quality and efficiency of selected e-government administrative services through three separate but interlinked components: (1) Foundations for Digital Service Delivery, (2) Transforming Services for Citizens and Businesses and (3) Change Management and Institutional Strengthening.

The Office for Information Technologies and Electronic Government (OITeG) has prepared a draft Resettlement Policy Framework (RPF) for EDGE Project which was submitted to WB for review and clearance. The RPF document has been prepared as a guide for the initial screening of the proposed project activities for any negative social impacts, which would require attention prior to project implementation. The RPF will ensure that the proposed project is implemented in accordance with the World Bank operational policies and local legislation related to environmental and social protection. Finally, ESMF document aims to provide sufficient guidance in the selection, preparation and implementation of subcomponents in order to avoid, minimize or mitigate social risks and impacts, and enhance the positive social opportunities of the Project.

On February 01, 2019, on its web site, the OITeG announced invitation for Public Consultations for the public, bodies and organizations interested in ESMF and RPF for EDGE project. Same announcement was published in daily newspaper "Vecernje novosti" on February 04, 2019. Public and other interested parties and organizations were invited to participate in process of public consultation on RPF document. RPF document and Call for Public Consultations were placed on the OITeG web site too. Insight into the RPF document was ensured on following addresses:

- the premises of the Office for Information Technologies and Electronic Government, Katiceva 14, Belgrade, on working days from 11:00 AM to 01:00 PM (local time), within 10 days in regard to the date of public announcement of this invitation;
- on the Office for Information Technologies and Electronic Government web site: <https://www.ite.gov.rs/>

On February 07, 2019, at 12:00 PM (local time), public consultations and presentation of the subject RPF document were organized at the big hall of the City of Kragujevac Assembly, Trg slobode 3.

2. Report on public consultation

In accordance with OP/BP 4.12, the Office for Information Technologies and Electronic Government (OITeG) has prepared a draft Resettlement Policy Framework (RPF) for Enabling Digital Governance in Serbia Project (EDGE).

The in-country disclosure of the RPF document started on February 01, 2019, when draft RPF document and call for public consultations was placed on the OITeG web site (Photos 1 and 2). On February 04, 2019, additional announcement and invitation to the interested parties were published in the daily newspaper “Vecernje novosti” (Photo 3), inviting the public, authorities and relevant institutions to have an insight into the RPF document, proposed project works and social impact of the project with presented mitigation and monitoring measures. Prior to announcement in the newspapers, all documents were delivered to the OITeG and made publicly available during whole consultation process.



Photo 1. Draft RPF placed at the OITeG web site



Влада Републике Србије

КАНЦЕЛАРИЈА ЗА ИНФОРМАЦИОНЕ ТЕХНОЛОГИЈЕ И ЕЛЕКТРОНСКУ УПРАВУ

JAVNE KONSULTACIJE U VEZI SA OKVIRNIM DOKUMENTOM ZA UPRAVLJANJE ŽIVOTNOM SREDINOM I SOCIJALNIM PITANJIMA I OKVIROM POLITIKE RASELJAVANJA ZA PROJEKAT PODRŠKA ELEKTRONSKOJ UPRAVI U REPUBLICI SRBIJI

Saglasno operativnoj politici Svetske Banke (OP 4.01)

Kancelarija za informacione tehnologije i elektronsku upravu, poziva na

JAVNE KONSULTACIJE

javnost, organe i organizacije zainteresovane za

OKVIRNI DOKUMENT ZA UPRAVLJANJE ŽIVOTNOM SREDINOM I SOCIJALNIM PITANJIMA I OKVIR POLITIKE RASELJAVANJA ZA

PROJEKAT PODRŠKA ELEKTRONSKOJ UPRAVI U REPUBLICI SRBIJI

Uvid u predmetni Okvirni dokument za upravljanje zaštitom životne sredine i Okvir politike raseljavanja može se izvršiti:

- u prostorijama Kancelarija za informacione tehnologije i elektronsku upravu, Katićeva 14, Beograd, svakog radnog dana od 11 do 13 časova u roku od 10 dana od dana objavljivanja ovog obaveštenja.
- na internet stranici preduzeća Kancelarija za informacione tehnologije i elektronsku upravu : <https://www.ite.gov.rs/>

Primedbe i mišljenja na Plan upravljanja zaštitom životne sredine i Okvirni plan raseljavanja se podnose u pisanom obliku i dostavljaju na adresu Kancelarije za informacione tehnologije i elektronsku upravu- Katićeva 14, Beograd. Primedbe se mogu dostaviti i elektronskom poštom na adresu kancelarija@ite.gov.rs.

U četvrtak 07.02.2019. godine, sa početkom u 12 časova biće održane javne konsultacije i prezentacija predmetnih dokumenata u velikoj sali Skupštine grada Kragujevca (adresa Trg slobode 3).

Za dodatne informacije obratiti se na sledeću adresu:

Kancelarija za informacione tehnologije i elektronsku upravu, Ulica Katićeva 14, 11000 Beograd, Republika Srbija,

tel./faks +381 11 /7358400

e-mail: kancelarija@ite.gov.rs

Photo 2. Call for public consultations placed at the OITeG web site



Влада Републике Србије
КАНЦЕЛАРИЈА ЗА ИНФОРМАЦИОНЕ ТЕХНОЛОГИЈЕ И
ЕЛЕКТРОНСКУ УПРАВУ

ЈАВНЕ КОНСУЛТАЦИЈЕ У ВЕЗИ СА ОКВИРНИМ ДОКУМЕНТОМ
ЗА УПРАВЉАЊЕ ЖИВОТНОМ СРЕДИНОМ И СОЦИЈАЛНИМ
ПИТАЊИМА И ОКВИРОМ ПОЛИТИКЕ РАСЕЉАВАЊА ЗА
ПРОЈЕКАТ ПОДРШКА ЕЛЕКТРОНСКОЈ УПРАВИ У РЕПУБЛИЦИ
СРБИЈИ

Сагласно оперативној политици Светске Банке (ОР 4.01)
Канцеларија за информационе технологије и електронску управу, позива на

ЈАВНЕ КОНСУЛТАЦИЈЕ

јавност, органе и организације заинтересоване за

ОКВИРНИ ДОКУМЕНТ ЗА УПРАВЉАЊЕ ЖИВОТНОМ СРЕДИНОМ И СОЦИЈАЛНИМ
ПИТАЊИМА И ОКВИР ПОЛИТИКЕ РАСЕЉАВАЊА ЗА

ПРОЈЕКАТ ПОДРШКА ЕЛЕКТРОНСКОЈ УПРАВИ У РЕПУБЛИЦИ СРБИЈИ

Увид у предметни Оквирни документ за управљање заштитом животне средине и
Оквир политике расељавања може се извршити:

- у просторијама Канцеларија за информационе технологије и електронску управу,
Катићева 14, Београд, сваког радног дана од 11 до 13 часова у року од 10 дана од
дана објављивања овог обавештења.
- на интернет страници предузећа Канцеларија за информационе технологије и
електронску управу : <https://www.ite.gov.rs/>

Примедбе и мишљења на План управљања заштитом животне средине и Оквир
план расељавања се подносе у писаном облику и достављају на адресу Канцеларија
за информационе технологије и електронску управу - Катићева 14, Београд. Примедбе
се могу доставити и електронском поштом на адресу kancelarija@ite.gov.rs.

У четвртак 07.02.2019. године, са почетком у 12 часова биће одржане јавне
консултације и презентација предметних докумената у великој сали Скупштине
града Крагујевца (адреса Трг слободе 3).

За додатне информације обратити се на следећу адресу:

Канцеларија за информационе технологије и електронску управу,
Улица Катићева 14, 11000 Београд, Република Србија,
тел./факс +381 11 /7358400
електронска пошта: kancelarija@ite.gov.rs.

Photo 3. Call for public consultations in a daily newspaper "Vecernje novosti", February 04, 2019

Disclosure of draft RPF document finished on February 07, 2019, when the public meeting was held in Kragujevac, at the big hall of the City of Kragujevac Assembly, Trg slobode 3.

A total of 16 participants attended the public consultation meeting in Kragujevac, including representatives of the OITeG, representatives of all relevant departments of the City of Kragujevac administration, public utility companies and the employees involved in the expropriation process (Photos 4, 5 and 6).



Photo 4. Public consultations in Kragujevac, February 07, 2019



Photo 5. Public consultations in Kragujevac, February 07, 2019



Photo 6. Public consultations in Kragujevac, February 07, 2019

The meeting started according to schedule at 12:00 PM.

The presentation was delivered by consultant supporting the OITeG during project appraisal, in the form of a power point presentation.

It was explained that RPF document had been prepared out of precaution enabling implementation of subcomponents if adverse social impacts should be encountered after all. It has been explained that physical investments causing loss of private lands, loss or damage to private assets such as fences, trees, standing crops, structures, etc. (however unlikely), will be allowed subject to implementation of adequate mitigation measures as designed in the Resettlement Policy Framework (RPF). The screening criteria and procedures will provide a project brief for the investment proposed for the project funding and shall identify what conditions precedent the subcomponent is to meet in terms of preparation of site-specific resettlement and/or livelihood restoration instruments.

After the presentation the floor was handed to the participants to engage in questions and seek clarifications of the presented document. During the public consultations, the following topics have been discussed:

- Potential impacts of the future DRC on the environment;
- Responsibilities of the City of Kragujevac administration in the future environmental protection related tasks;
- Issuing of permits in general.

Also, representatives of the City administration presented the progress of the expropriation process.

There were no comments, remarks or complaints related to issues presented in the RPF, and no socially related issues were raised.

Respecting social impacts of this project, Project presenters informed all participants that under this project, any physical investments that will cause loss of private lands, loss of damage to private assets such as fences, trees, standing crops, structures, etc., will be allowed subject to implementation of adequate mitigation measures as designed in the Resettlement Policy Framework (RPF). The screening criteria and procedures will provide a project brief for the investment proposed for the project funding and shall identify what conditions

precedent the subcomponent is to meet in terms of preparation of site specific resettlement and/or livelihood restoration instruments.

During the time aimed for insight no comments nor questions were received.

Consultation started at 12:00 PM and ended at 01:30 PM, local time.

The list of participants is presented in the Photo 7.

Списак присутних јавне консултације за јавност, органе и организације заинтересоване за "Оквирни документ за управљање животном средином и социјалним питањима" и "Оквир политике расељавања" за пројекат "Подршка електронској управи у Републици Србији". 07.02.2019. КРАГУЈЕВАЦ

Ред. бр.	Име и презиме	Контакт телефон	E-mail адреса	Организација
	Ана Јосовић	060/3880505	ana.josovic@urbanizam.co.rs	УМ Урбанизам
	Дана Ђуровић	069/4155040	dana.dj@kg.org.rs	IT "SMART CITY"
	САША ВЕСЕЛИНОВИЋ	060/1370666	sasa.veselinovic@ite.gov.rs	OITEG
	ДАРИЛО САВИЋ	0602340140	dsavic@kg.org.rs	ГРАДСКА УПРАВА
	Ђорђе Милаковић	064/8540-177	jkpv.kg.buhajlovic@gmail.com	ЈКР "Наповод и казалиште"
	Александра Маринковић-Ђуровић	064/85-40-228	jkpv.tastita@gmail.com	ЈКР "Богдогов и новинарска"
	Јелена Ђековић-Ђурић	064/85-40-571	-	-
	Радосав Вуловић	060/2340-161	rvulovic@gmail.com	ГУ за инвестиције
	НЕВАД АНТОНИЈЕВИЋ	060/0230682	nevad.antonijevic@ite.gov.rs	OITEG
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	Невојна Рокитица	063-611-775	NEVOJSA.POKITIC@DUMI.JI	КАДЛУТНИЦА

Photo 7. List of participants – Public consultations in Kragujevac, February 07, 2019