

Stakeholder Engagement Plan

Krivača Windfarm Project

Ivicom Energy d.o.o.

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1 Introduction

Ivicom Energy d.o.o. (Ivicom, Sponsor) is proposing to develop a 103.32 megawatt (MW wind farm in Krivača in Serbia ('the Project'). The Project is planned to consist of wind turbine generators (WTGs), cable lines, overhead transmission lines, substations and roads.

For Serbian national permitting purposes, the Project has been subject to three environmental impact assessments (EIAs), one undertaken for the wind farm and two for the 110 kilovolt (kV) OHLs. As part of the requirements of the financing institutions, an ESIA addendum has been prepared in line the IFC Performance Standards on Environmental and Social Sustainability (2012) (IFC PSs) and the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines).

To meet these requirements for stakeholder engagement and public consultation and disclosure, this Stakeholder Engagement Plan (SEP) has been developed and will be implemented by the Sponsor. The purpose of the SEP is to present how the Project plans to communicate with people who may be affected by or are interested in the project. The plan also describes the grievance mechanism for people to raise any concerns about the Project. This SEP will be periodically reviewed and updated by the Sponsor, as important Project information becomes available.

2 Project Description

The Project is located in the northeast region of Serbia, in the Braničevo District, approximately 100km east-southeast of the capital Belgrade, covering an area of approximately 242ha.

The Project will have a total installed capacity of 103.32MW and will consist of 22 WTGs, each with a capacity of 4.8MW. The WTGs will be grouped in three clusters:

- Venac (11 units, WTGs T1-1 to T1-15)
- Tilva (5 units, WTGs T2-1 to T2-5)
- Debelo brdo (6 units, WTGs T3-1 to T3-7)

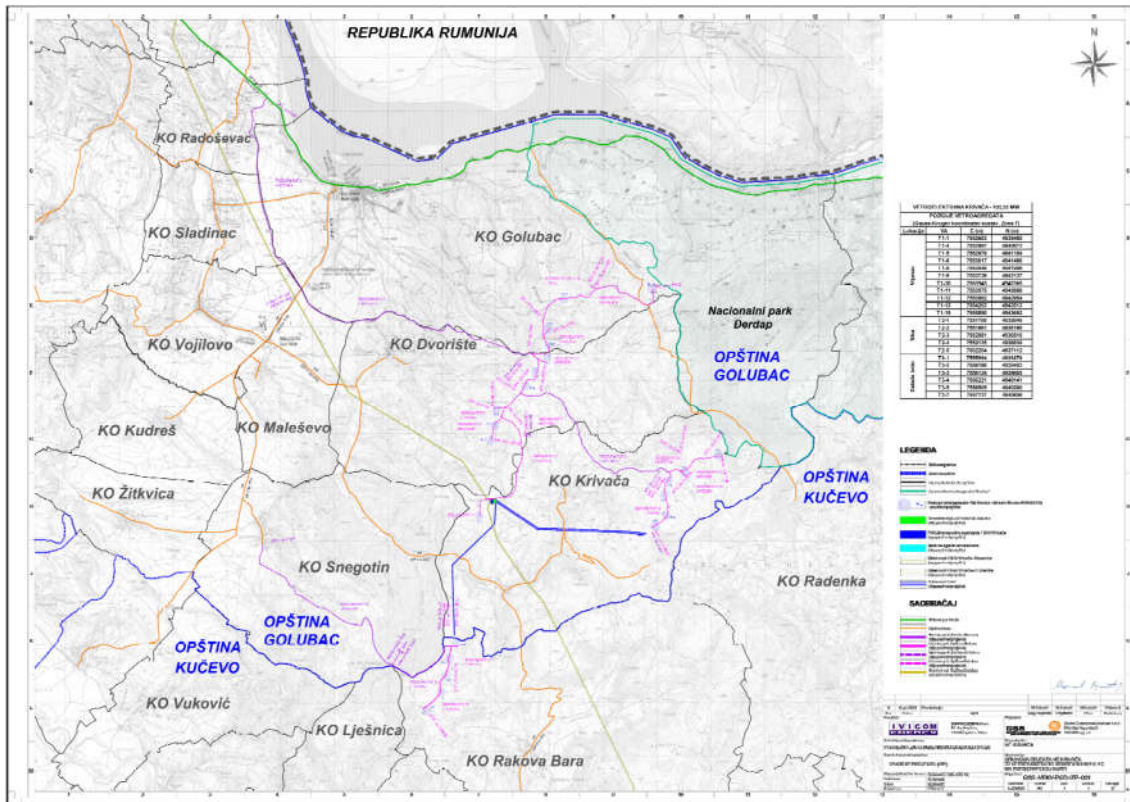
Other Project components include:

- Transformation 110/33kV (SS) „WF Krivača“
- Switchyard (SY) 110kV „Krivača“
- Two single-system 110kV transmission lines connecting the Switchyard to the existing 110/35kV substations in Neresnica and Veliko Gradište
- Two internal double-system 33kV TLs connecting the Transformation with the WTG clusters
- An underground MV cable system
- 17.2km of access roads
- 13.3km of service roads
- expansion of the existing SS "Neresnica" with a new transmission field
- expansion of the existing SS "Veliko Gradište" with a new transmission field.

The Project's 22 WTGs, Transformation, Switchyard and two internal 33kV OHLs are located on the boundary between the municipalities of Golubac and Kučevo. The two 110kV OHLs for grid connection will cross the municipalities of Golubac, Kučevo and Veliko Gradište. The River Danube, which is the national border with Romania, is 2.3 km from the nearest proposed WTG. East of the Project site is Đerdap National Park, with the closest WTG being located 212 m from its border.

Several local communities surround the wind farm: Krivača, Dvorište and Snegotin belonging to the territory of the municipality Golubac and Rakova Bara and Radenka belonging to the municipality Kučevo.

Figure 1. Components of the Krivača wind farm project



Source: Global solutions for substations

An environmental and social impact assessment has been carried out for the three phases of the Project: construction, operation and cessation of operation. Impacts have been classified as those related to ecology and nature conservation, landscape and visual impacts, traffic and transport, noise, socio-economic impacts, health safety and public nuisance, emissions to ground and water, air emissions, archeology and cultural heritage, electric and magnetic fields and electromagnetic interference.

Identified impacts will be managed and mitigated in accordance with best practice. Among others, an important measure includes informing the local population in a timely manner about relevant Project issues and consulting on appropriate ways to address them, which is why this SEP has been prepared.

The Project requires acquisition of land for several components: construction of WTGs, Transformation and Switchyard, OHLs and access and service roads. Land needed for the access and service roads is being acquired by the two relevant municipalities (Golubac and Kučevo), based on the Law on Expropriation of the RS (Official Gazette of the RS 53/95, 16/01, 20/09, 55/13, 106/2016). Further work will be carried out by Ivicom, to identify if the acquisition of land has caused / will cause economic displacement, especially for vulnerable households, in which case the Company will develop and implement mitigation measures to ensure that people's livelihoods have been fully restored to their previous level.

More information on the Project, as well as expected environmental and social issues, along with planned mitigation measures, is available in the ESIA addendum (see section 6.1).

3 National and International Requirements

3.1 National Regulatory Requirements

As the highest legal act in the country, the Constitution of the Republic of Serbia (Official Gazette of the RS No. 98/2006) provides citizens with rights in relation to truthful, complete and timely access to information and participation on issues of public importance (Articles 51, 53), as well as the right to appeal or use other legal remedies to protect their rights (Article 36) and submit suggestions/complaints to public authorities (Article 56). These provisions are further detailed in the Law on Free Access to Information of Public Importance (Official Gazette of the RS, No. 120/04, 54/07, 104/09, 36/10, 105/21).

As a first step, disclosure and consultation steps are undertaken under the Law on Planning and Construction ("Official Gazette of the RS", no. 72/09, 81/09 (correction), 64/10 (CC), 24/11, 21/12, 42/13 (CC), 50/13 (CC), 98/13 (CC), 132/14, 145/14, 31/19, 37/19, 9/20 and 52/21) for the development and adoption of spatial and urban planning documents, including detailed regulation plans. The disclosure and consultation requirements are described in detail in the Regulation on the Content, Manner and Procedure for the Development of Spatial and Urban Planning (Official Gazette of the RS no. 31/2010, 69/2010 and 16/2011)¹. The process is almost identical to the one described further in the text for the approval of EIA.

Serbian laws and bylaws in the area of environmental protection, including the Strategic Environmental Impact Assessment Law (Official Gazette of the RS no. 135/04 and 88/10 and the Environmental Protection Law (Official Gazette of the RS no. 135/04, 36/09 (other law), 72/09 (other law), 43/11 (CC), 14/16, 76/18 (other law) and 95/18 (other law)), require the public to be informed about and involved in all matters concerning the environment. Public disclosure and consultation procedures are organized in connection to the development of project environmental impact assessments (EIAs) as per the Rules for Disclosure of Information, Presentations and Public Consultations Regarding EIAs (Official Gazette of the RS 69/05).

There are several disclosure and consultation activities which are undertaken by the authorities before the approval of the EIA and they are as follows:

¹ A new regulation has since been adopted - Regulation on the Content, Manner and Procedure for the Development of Spatial and Urban Planning Documents (Official Gazette of the RS 32/2019), however, the one mentioned in the text was valid when the Detailed Regulation Plans for the Project were approved.

- Informing the public through the media about details of disclosure of the draft EIA (i.e. where the electronic version and hard copy are available for review, the dates and time when the hard copy can be reviewed) and inviting citizens/organisations to submit comments and/or attend a public debate during the disclosure period. Citizens can request that their comments are responded to in writing;
- Organising a public debate to present the draft EIA (usually in the town hall or other appropriate local venue) during the disclosure period;
- Processing comments received from all stakeholders and revising the EIA to reflect them, as well as preparing a report to justify why certain comments were not adopted;
- Submission of the revised EIA and report to relevant authorities (Ministry) which judge whether the comments have been meaningfully considered and addressed.
- Publication of the Environmental Impact Assessment Agreement on the website of the relevant ministry.

3.2 IFC Requirements

Projects being funded by IFC and other International Financial Institutions (IFIs) are required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the IFC Performance Standards on Environmental and Social Sustainability (2012).

These requirements are described in detail in the IFC Performance Standard 1. In summary, the IFIs consider stakeholder engagement an ongoing process which involves:

- the client's public and timely disclosure of appropriate information so as to enable meaningful consultation with stakeholders
- meaningful consultations with potentially affected parties, and
- a procedure or policy by which people can make comments or complaints.

4 Previous Stakeholder Engagement

4.1 Detailed Regulation Plans and Strategic Impact Assessments of the Krivača Wind Farm

The disclosure and consultation process in relation to the Project began with several activities required under the Serbian legislation, as described in Section 3.1.

The Decision for the Development of the Detailed Regulation Plan and Strategic Environmental Impact Assessment (SEIA) for the Krivača Windfarm, in each of the three municipalities, was published in the municipals' Official Gazettes. Each Decision contains a brief overview of Project components located in the municipality in question, as well as the description of the content of the regulation plans and SEIAs.

As required under national legislation, opinions and conditions for the Detailed Regulation Plan and the SEIA were requested from a significant number of stakeholders, as follows:

- Republic Institute for Nature Protection
- Regional Institute for the Protection of Monuments from Smederevo
- Ministry of Defense of the RS, Administration for Infrastructure

- Public Enterprise Serbia Water (“Srbijavode”)
- Ministry of Internal Affairs of the RS, Sector for Emergency Situations
- Public Communal Enterprise Golubac
- Construction Directorate Golubac
- Public Enterprise EMS (Elektromreža Srbije)
- Public Enterprise ED Elektromorava
- Telekom Požarevac
- Republic Seismological Institute
- Republic Hydro Meteorological Institute
- Directorate for Civil Aviation
- Public Enterprise Roads of Serbia (Putevi Srbije)
- Public Enterprise Railways (Železnice Srbije)
- Construction Directorate Kučevo
- Public Communal Enterprise Kučevo
- Factory for Mineral Water Neresnica
- National Park Đerdap
- Public Communal Enterprise Standard from Veliko Gradište
- Public Communal Enterprise Dunav from Veliko Gradište
- Construction Directorate Kučevo
- Public Enterprise ETV (Emisiona tehnika i veze)
- Flight Control SMATSA
- Public Communal Enterprise Serbia Forest (Srbijašume)
- Roads Enterprise Požarevac
- Local Council Rakova Bara Community
- Hunting Association “Jelen” “

All conditions and suggestions submitted by the above stakeholders were acknowledged and addressed in the draft Detailed Regulation Plans and SEIAs, as appropriate.

In all three municipalities, the disclosure period for the draft plans and the SEIAs was organised from 31.05.2013. to 01.07.2013. Announcements were placed on the official announcement boards of the municipal assemblies and one local community, published on municipal websites, as well as in the daily newspaper “Večernje novosti” on 30.05.2013. The same announcements informed the public where documents were available in hard copy for review (in municipal administration buildings), that comments can be submitted before the end of the disclosure period (including information on how and where comments can be submitted), that public debates will be held on 18.06.2013. in the municipal administration buildings in Golubac and Kučevo and the dates / times and venues where public sessions of the Committees for Plans will be held in each municipality.

Very few comments were received on the regulation plans and SEIAs during the disclosure period, from Ivicom, the municipality Kučevo, the Directorate for Construction and

Development of Settlements of the municipality Kučevo, the public enterprise in charge of managing forests (Srbijašume), two associations for the protection and hunting of game (one from Golubac, the other from Kučevo) and an association for the breeding of pigeons. The association from Golubac felt that the SEIA did not fully convince them that the project will not have negative impacts on the environment, more specifically on the sustainable development and the reproduction of game in their hunting ground. The association from Kučevo stated that they agree with the SEIA, however they highlighted that the Project will reduce the area of their hunting ground, that certain types of game and birds will migrate from areas where the wind turbines will be built and that the noise produced by wind turbines will not have a significant impact on game. The association for the breeding of pigeons expressed their agreement with the SEIA.

Reports on the public disclosure and consultation process were developed, including responses to comments received and the reasons why they were accepted or not by the Plan Committee. Revisions of the draft documents were made in line with the decisions of the Committee and final documents were approved and published in the Official Gazettes of each municipality.

The Project is also presented in the Spatial Plans of the relevant municipalities (Golubac and Kučevo), which were subject to a disclosure and consultation process as per the law.

4.2 EIA for windfarm Krivača and both OHLs

A similar disclosure and consultation process to the one described in the previous section (4.1) was carried out in 2015 and 2016, for the preparation and adoption of Environmental Impact Assessments for the Krivača windfarm and for each of the 110 kV OHLs.

Announcements about the disclosure and consultation process for the two OHLs and the windfarm were made in local newspapers (weekly paper of the Braničevo district “Reč naroda”), on local announcement boards and websites of the municipalities and the responsible Ministry. The EIA for the windfarm was available for review from 13.03.2015. to 01.04.2015. in the premises of the responsible Ministry in Belgrade and the offices of the relevant municipalities. The EIAs for the two OHLs were also available for review in the Ministry, as well as in the offices of the three affected municipalities in the period 18.03.2016. to 06.04.2016. The addresses of each location were provided in the announcements. A public debate to discuss the windfarm EIA was held in the municipality Golubac on 17.04.2015. and for the OHL EIAs on 20.04.2016. also, in Golubac. No comments were received on the disclosed documents and their final versions were approved and published in the Official Gazettes of the Republic of Serbia.

4.3 ESIA Addendum for the Krivača Wind Farm Project

Consultants engaged by Ivicom to address social issues held preliminary scoping meetings in fall 2014 with representatives of two municipalities – Golubac and Kučevo, representatives of two Local Communities Radenka and Dvorište, as well as a group meeting with approx. 20 residents from the village Dvorište (in the local restaurant/community center). The purpose of these meetings was to determine to what extent stakeholders were informed about the Project and what topics/issues they believed needed to be addressed in the environmental and social impact assessment. At that time, all individuals met were very positive about the Project and hoped that it would be implemented soon. The municipalities were enthusiastic

for the investment to start, in an otherwise underdeveloped region of Serbia, while local communities and people were eager for Project benefits, including employment opportunities, payments for leased land and construction of local roads.

In the preparation of the ESIA Addendum, in summer/fall 2016, consultants working on environmental issues held scoping meetings with representatives of the National Park Đerdap, the Regional Institute for Protection of Cultural Monuments of Smederevo, associations of hunters and pigeon keepers, as well as nature conservation organisations from the area. At the end of 2016, consultants working on social issues held more meetings with stakeholders, primarily in relation to land acquisition. They met with representatives of the two municipalities – Golubac and Kučevo, carrying out land acquisition for the construction of access and service roads, as well as with residents of local villages whose land was acquired (or in the process of being acquired) for the Project (see [Figure 1](#)). A total of eight local residents were interviewed by the social consultants after being randomly encountered in the local communities on 27th and 28th December 2016. Two of the owners have land needed for the construction of WTGs and roads, four have land needed for the construction of roads and two have land needed for the construction of OHL towers. The key feedback² provided during the interviews was that owners of land did not feel that they would be economically displaced, as the land is not intensively farmed and small areas are being acquired at an acceptable compensation rate. All felt that the construction of access and service roads would be useful for them and for local residents in general, to access their land more easily.

Figure 1 Meetings with land owners and municipal authorities, December 27th and 28th 2016.



Izvor: LINK 011

During the December mission, the consultants also met with the president of the association from Golubac³ who submitted comments on the SEIA and felt it did not provide enough answers on how game would be impacted by the Project and what would be the mitigation measures. The consultants informed the president of the association that an Addendum is being prepared, to international standards, and encouraged him to review it and submit comments / questions during the disclosure period. The consultants also met with Golubac Municipality Coordinator for Public Works to collect baseline data for the ESIA Addendum.

4.4 Land Acquisition for the Project

For the acquisition of land through long term lease agreements concluded on a willing buyer – willing lessor basis for 22 WTG locations, representatives of Ivicom met with 65 owners of land plots. Three group meetings were held, two of which in the local community Rakova Bara

² More details on the provided feedback is available in the Project ESIA Addendum, in sections which address Project related land acquisition.

³ Association for the Breeding, Protection and Hunting of Game Golubac

and one in Krivača. On behalf of the Transmission System Operator, Ivicom had individual meetings with approx. 230 owners of land plots, to conclude permanent servitude agreements on a willing buyer – willing seller lessor, for the construction of 180 110 kV power line towers.

Land needed for construction and re-construction of access and service roads in two municipalities – Golubac and Kučevo is being acquired by the municipalities based on Public Interest Decisions of the Government of Serbia, which have been publicly disclosed. Both municipalities organized group meetings with affected owners of land in several local communities, where the need for land acquisition and the process of expropriation were explained to meeting participants. These were followed by individual meetings to obtain agreements for expropriation and conclude agreements and / or pass expropriation decisions where such agreements have not been concluded. The process is ongoing and is expected to cover a total of approx. 670 owners of land by the time it is completed.

4.5 Support for Local Initiatives

To date, Ivicom has invested in a number of local activities and initiatives in the area of infrastructure improvements, sports, education, culture, hunting/beekeeping and tourism and has met with their representatives and/or participated in their sponsored events⁴. This activity will continue with the implementation of the Project Community Investment Fund (see [Annex 2 – Community Investment Fund](#)).

5 Stakeholder Identification and Analysis

Project stakeholders have been identified based on proximity to Project components, potential degree of impact on them during construction and operation and interest in and concerns about the Project, as well as the level of influence they may have on the Project.

Stakeholder identification was initiated at the Project planning stage and was carried out for this SEP, on the basis of the following information:

- Analysis of all Project related materials and documents, including the Detailed Regulation Plans, the national EIA, expropriation elaborates, etc.;
- Analysis of information about the affected area (location in relation to villages, towns, infrastructure, natural resources, etc.);
- Analysis of information about the communities in the Project area;
- Analysis of currently available information about owners of land which has been or will be acquired for the Project;
- Field activities and meetings carried out to date in relation to land acquisition and resettlement;
- Consultations with local authority representatives (local communities and municipalities);
- Analysis of minutes of previous public consultation meetings held for the development of Detailed Regulation Plans and EIAs;
- Analysis of the NGOs / associations that have already shown an interest in the Project through participation in meetings and communication with Ivicom;

⁴ From 2010 to the end of 2016, over 37,000 EUR were donated to various local institutions, associations and organisations.

- Analysis of the donations that were provided to local activities and initiatives by Ivicom to date;
- Analysis of Ivicom internal stakeholders (employees, contractors, sub-contractors and suppliers).

Table 1 below provides an overview of stakeholder groups identified by Ivicom to date. It will be periodically updated to include any newly identified stakeholders and to plan future engagement activities and timeframes. If you are not on the list, but would like to be included and kept informed about the Project, please contact the responsible Ivicom representative using the contact details provided in Section 9 of the SEP.

Table 1 Project Stakeholders

Stakeholder/s	Type of Communication and Proposed Method	Responsibility	Time frame
External stakeholders			
<p>People directly affected during construction and operation phases:</p> <ul style="list-style-type: none"> • Residing or using land in Project affected areas • Owners of businesses operating along transportation routes (primarily Route 256, near the Monastery Tuman) <p>This includes the following local communities: Krivača, Dvorište, Snegotin, Rakova Bara and Radenka.</p>	<p>Information provided to residents / businesses using the land or operating in areas affected by the Project, through community meetings, as well as public notice boards (in the municipalities and in local communities) and safety signs.</p> <p>Local media:</p> <ul style="list-style-type: none"> • daily newspaper “Večernje novosti” • weekly paper of the Braničevo district “Reč naroda” • municipal websites <p>ESIA Addendum, NTS and SEP published on the Ivicom website (http://ivicom-energy.com). Ivicom Community Investment Fund report published at the end of each year starting from 2018.</p>	Ivicom CLO and Site Manager	Throughout the implementation of the Project, as appropriate
<p>Owners of land expropriated for the construction and upgrading of access and service roads.</p> <p>Users of land (who are not the owners) acquired for the Project.</p> <p>Users of land disrupted during any of the Project phases (damages to crops, trees, etc.).</p>	<p>As above.</p> <p>Household level land acquisition impact assessment interviews, to determine if the households are vulnerable and/or if they have been economically displaced by land acquisition.</p> <p>Participation in valuation of damages done by court certified valuers and meetings with Ivicom for compensation.</p>	Ivicom CLO and Site Manager	<p>Prior to construction</p> <p>During construction, operation and decommissioning phases.</p>
Respective contractor for planning, acquiring land and constructing OHLs	Regular communication by phone or through meetings, project progress updates and reports	Ivicom senior management	Prior to and throughout construction

Stakeholder/s	Type of Communication and Proposed Method	Responsibility	Time frame
Local community representatives (presidents) – Krivača, Dvorište, Snegotin, Rakova Bara and Radenka.	Regular communication by phone or through meetings, project progress updates and reports	Ivicom CLO and Site Manager	All Project phases
Local municipal authorities (Golubac, Kučevo and Veliko Gradište)	Official correspondence and meetings, project progress updates and reports Permitting procedures Meetings with Golubac and Kučevo representatives for allocation of funds as part of the Community Investment Fund	Ivicom Site Manager and senior management	Prior to starting of construction activities and during implementation
Relevant national level authorities for example: <ul style="list-style-type: none"> Ministry for Construction, Traffic and Infrastructure Ministry of Energy and Mining Ministry for the Environmental Protection Relevant municipal transport departments Police departments 	Official correspondence and meetings, progress reports Permitting procedures	Ivicom senior management	During project design, construction and implementation
Interested NGOs and other organisations: <ul style="list-style-type: none"> Association for the Breeding, Protection and Hunting of Game Golubac Eko Pek Golubac Association of Hunters 'Jelen' Kučevo Association for the Breeding of Pigeons Highflyers Kučevo 	Local media: <ul style="list-style-type: none"> daily newspaper "Večernje novosti" weekly paper of the Braničevo district "Reč naroda" municipal websites ESIA Addendum, NTS and SEP published on the Ivicom website (http://ivicom-energy.com). Ivicom Community Investment Fund report published at the end of each year starting from 2018.	Ivicom CLO and Site Manager	Throughout the implementation of the Project
National Park Đerdap	Regular communication by phone or through meetings, project progress updates / E&S monitoring reports	Ivicom Site Manager	Throughout the implementation of the Project
Public Enterprise "Srbija šume" (Serbia Forests)	Official correspondence Meetings for forest planting on or off site, as compensation for areas lost to the Project	Ivicom Site Manager	Upon completion of construction
Institute for the Protection of Cultural Monuments in Smederevo	Official correspondence and meetings, in case of chance finds.	Ivicom Site Manager	During project design
The Monastery of Tumane	Regular communication by phone or through meetings, project progress updates / E&S monitoring reports	Ivicom Site Manager	Throughout the implementation of the Project

Stakeholder/s	Type of Communication and Proposed Method	Responsibility	Time frame
Internal stakeholders			
Ivicom employees	Ivicom HR Policy Grievance procedure Code of conduct	Ivicom HR Ivicom senior management	Throughout the implementation of the Project
Ivicom senior management	Regular reporting on project progress, impacts and undertaken measures	Ivicom CLO and Site Manager	Throughout the implementation of the Project
Workers employed by contractors and their subcontractors	Information in contract, bulletin board, training. Grievance procedure. Code of conduct	Ivicom senior management	Upon the selection of subcontractors and during construction

6 Planned Stakeholder Engagement Activities

6.1 Pre-Construction Engagement Activities

On April 1st, 2022., the following draft documents will be publicly disclosed and available for comments for a period of 60 days:

- ESIA Addendum, which includes a framework Environmental and Social Management Plan (ESMP) and Environmental and Social Action Plan (ESAP)
- Non-Technical Summary (NTS) of the ESIA Addendum
- Stakeholder Engagement Plan

The documents will be published on the Ivicom official website (<http://ivicom-energy.com>) in Serbian and in English. Hard copies will be available in the following locations:

- Ivicom Energy d.o.o –115e Mihajla Pupina Boulevard, Petar Kovaečvi, mobile: 063/445 418
- Golubac municipality - Branch Ivicom Holding GmbH Golubac, 28 cara Dušana street, 12223 Golubac, Dušan Muškatirović, 064/8170 173
- Kučevo municipality – Branch Ivicom Holding GmbH Golubac, 28 cara Dušana street, 12223 Golubac, Dušan Muškatirović, 064/8170 173

During the disclosure period of 60 days, consultation meetings will be held in two locations, Golubac municipality and Kučevo municipality. The exact dates, times and locations for these events will be published in this SEP at least three weeks in advance, as well as in the weekly paper of the Braničevo district “Reč naroda”. Announcements will also be placed on the Ivicom official website (<http://ivicom-energy.com>), on municipal websites and on local community notice boards - Krivača, Dvorište, Snegotin, Rakova Bara and Radenka.

Impacts on the territory of the municipality Veliko Gradište are minor and therefore residents of that municipality are welcome to attend any of the two meetings held in the other municipalities.

Topics which will be covered in the meetings include:

- Project description including transport routes and expected timelines for construction and operation

- Results of the additional environmental and social impact assessment and proposed mitigation measures contained in the framework ESMP and ESAP (e.g., increased noise caused by construction machines and the most appropriate time of day for certain activities near sensitive receptors, possible impacts of Project related transportation on road 256, etc.)
- Planned stakeholder communication (Stakeholder Engagement Plan)
- Project grievance mechanism
- Community Investment Fund

6.2 Land Acquisition Household Impact Assessment

Ivicom will carry out an assessment of impacts caused by land acquisition, at household level, before construction begins. The aim of the survey will be to determine if a household has been economically displaced by the land acquisition and if the affected household is vulnerable, so that adequate mitigation measures can be defined and implemented to address any negative impacts, as required by industry practice.

Households who will take part in the survey will be contacted individually for setting up an interview. The assessment will target primarily households whose land has been acquired by municipalities for the access and service roads, however some interviews may also include households who are using land which has been acquired through voluntary transaction, but who are not the owners of that land.

6.3 Engagement During Construction and Operation

This SEP will be permanently updated to provide more detailed information for stakeholder engagement during the construction phase, with the aim of:

- Providing contact details of contractor(s) and presenting their planned engagement activities with stakeholders;
- Notifying affected communities in advance of any activities which may result in short term impacts, disruptions;
- Providing individuals and communities with information on the progress of construction and its implications;
- Monitoring the implementation of mitigation measures and assessing the impacts of construction on affected stakeholders and communities;
- Monitoring community attitudes and grievances during the construction phase.

On July 27, 2022, a meeting was held with the residents of the village of Krivača, in the House of Culture. At the meeting, a discussion was held with the locals about the progress of the works on the construction of the wind farm. In the conversation with the residents of the village of Krivača, information was obtained that during the execution of works, there are occasional, frequent, but also short-term, restrictions in terms of access to plots, use of the access road to residential buildings or economic activities, depositing of excess soil and removed vegetation in the road zone, but also that all disturbances are eliminated relatively quickly. They also expressed a positive attitude - that needs of residents who suffer impacts are being met on the site - access to plots, households, residential buildings and other plots

that are in the immediate area of works are being improved. A proposal was made to regularly inform the residents and the organization at the level of the village of Krivača about all activities on the construction site that may have an impact on the functioning of individuals and organizations of the local community as a whole.

Picture 3. Meetings with land owners in the village of Krivača on July 27, 2022.



On August 8, 2022, in the village of Dvorište, a meeting was held in the premises of the local community. The meeting was held with consultants for solving social and environmental issues engaged by Ivicom, a representative of Ivicom and the residents of this village. Discussed issues and problems of the residents of this village that arise during the construction of the road infrastructure for the planned "Krivača" wind farm. The meeting was attended by 16 expropriated land owners, who gave their land for the needs of the Project. The interviewed residents agree, in the majority, that they receive timely notifications about all activities that may lead to short-term impacts and disruptions in the daily routine of life and work and daily activities. Proposals related to the controlled depositing of excess soil, the removal of trees and other vegetation and their permanent storage, as well as the mandatory watering of the soil at the sites of construction works (with the aim of reducing dust).

Picture 4. Meetings with land owners in the village of Dvorište on August 8, 2022.



On September 9, 2022, a representative of Ivicom with consultants for solving social and environmental issues visited the residents of the village of Rakova bara, with whom a meeting was held. The meeting was held in front of the local community where everyone present was heard. Residents of the village of Rakova bara showed great interest in the opening and start of work of the WF "Krivača". The residents were once again informed about the planned activities on the territory of their municipality and the construction of roads on the territory of the village of Rakova Bara is eagerly awaited. There were no complaints about the previous attitude of investors towards the community and individuals.

Picture 5. Meetings with the residents of the village of Rakova bara on 09.09.2022.



On October 21, 2022, in the premises of the municipal administration of the municipality of Kučevo, a meeting was held with the authorities of the local administration of the municipality of Kučevo to implement the procedure. The local administration bodies of the municipality of Kučevo were thoroughly acquainted with the "Krivača" VE Project. The authority in charge of issuing building permits under the jurisdiction of the local self-government carries out the procedures without any problems and cooperates with the competent authority for the environment. It was established that all facilities for which building permits are issued at the local level are included in the Environmental Impact Assessment Study (EIA). It was established that the local self-government body is already preparing procedures for the transfer of local road infrastructure to the jurisdiction of the local self-government in order to efficiently complete the procedure. They also agree that individual deficiencies and delays in the procedures before the competent authorities and institutions are quickly eliminated and do not disturb the procedures of the unified procedure. Also, they agree that all eventual disturbances on the ground are quickly eliminated and do not disturb the traditional habits of the local population on a significant scale (time and space), that is, there were no recorded dissatisfactions of citizens in the areas where activities are carried out on the ground. In the conversation, a proposal was made to make the Cadastre of underground installations mandatory; when carrying out work on the installation of cables, the proposal of the local self-government authority to simultaneously record the cable route, the depth of laying and everything that is important for a proper Cadastre of underground installations.

Picture 6. Meetings with the local administration bodies of the municipality of Kučevo for the implementation of the procedure on 21.10.2022.



In order to continue good practice, the proposals of the local self-government authorities were related to the prevention of possible problems on the ground, i.e. in the areas where work is being carried out, especially:

- for potential degradation processes and impacts in the affected area, caused by direct or indirect impacts of the execution of works, to be quickly eliminated because they may cause dissatisfaction of the local community;
- there are possible negative impacts on the local community, individuals, impacts on soil, surface and underground water.

On November 10, 2022, representatives of the Investor with consultants met again with the inhabitants of the village of Krivača, in order to hear their opinion on the progress of the Project. The meeting was held in the premises of the local community. And this time, the residents of the village of Krivača presented the problem that during the execution of works, there are occasional, frequent, but also short-term, restrictions in terms of access to plots, use of the access road to facilities for performing economic activities, depositing excess earth, stone and removed vegetation in the road zone. Representatives of the Investor with consultants visited the household of Violeta Golubović, in order to determine the damage caused by vibrations during the construction of the road infrastructure. The residents also confirmed that all disturbances that occur during the execution of the works are quickly removed and do not disturb the usual habits of the population.

Picture 7. Meetings with the residents of the village of Krivača on 11/10/2022



On November 11, 2022, a meeting was held in the Monastery of Tumane with the representative of the monastery, Father Jakob. Great interest was shown in the opening and start of work of WF "Krivača" and absolute support and blessing was given to the Project. Father Jakob expressed his desire to visit the site and suggested that the next meeting be held with the foresters, in order to agree with them on the construction of access roads to the central part of the monastery's enclosure. Cutting access roads would allow foresters to more easily exploit wood for the needs of the Monastery.

Picture 8. Meetings with Father Jakob in Tumane Monastery on 11/11/2022.



As the project moves into the operational phase, the SEP will be updated again to present the activities that will be implemented in this phase, with the aim of:

- Reporting on SEP implementation and complaints management;
- Notifying interested parties about the results of environmental and social monitoring and audits carried out during the work phase;
- Managing and monitoring the effectiveness of any corrective actions implemented as a result of stakeholder concerns or complaints during operations.

7 Resources and Responsibilities

Since the beginning of Project planning, Ivicom has been allocating time and financial resources for engaging with a wide variety of stakeholders, as presented in Section 4. In the earliest stages of project preparation, most of the engagement was carried out by Ivicom employees and representatives, which was later complemented by work undertaken by externally contracted consultants. An important activity for local communities has been the financial support for local activities and initiatives, which will continue with the implementation of the Community Investment Fund (see Annex 2 – Community Investment Fund).

Upon the finalization of this SEP, responsibility for stakeholder engagement will be formalized and assigned to a Community Liaison Officer (CLO), who will report directly to the Ivicom Site Manager and whose tasks will include:

- Communication and implementation of the Project's SEP
- Communication and management of the Project's Project performance grievance mechanism
- Undertaking visits to Project-affected communities to talk to community representatives about grievances logged
- As required undertaking investigations to address community grievances raised (through coordination with the site manager)

- Keeping records of all stakeholder engagement notes
- Keeping records of all grievances logged and how issues are addressed
- Reporting of stakeholder engagement and information disclosure activities to the Ivicom site manager
- Reporting of non-conformances with SEP and any grievances to the Ivicom Site Manger
- Updating of the SEP as scheduled therein and/or when new stakeholders are identified, the Project scopes changes, and before operation commences.

The Ivicom Site Manager will develop annual environmental and social reports which will describe Project impacts, undertaken mitigation and enhancement activities and a summary of processed external grievances. In addition, a report will be developed on the implementation of the Community Investment Fund. These reports will be posted annually on the Ivicom website and will be provided all other interested stakeholders.

8 Grievance Mechanism

Ivicom, and the Contractor(s) once appointed, will receive and consider all comments and complaints associated with the Project. A sample of the Project Public Grievance Form is provided at the end of this document (Annex 1). Any person or organization may send comments and/or complaints in person, by phone or via post or email using the contact information provided in Section 9 of the SEP).

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. Complaints may also be anonymous, although of course there will be no direct response to those who complain in this way.

All grievances will be registered and acknowledged within 5 working days and responded to within 20 working days of receiving the grievance. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

The Ivicom CLO will monitor the way in which grievances are being handled by the Contractor(s) and ensure they are properly addressed within deadlines specified above. The CLO will keep a grievance log of all grievances (including those received and addressed by the Contractor(s)), based on which grievance management reports will be produced and included in the annual environmental and social reports, posted on the Ivicom website.

In cases when the complainant is not satisfied with the way his / her grievance has been responded to or handled and re-submits it, Ivicom will invite representatives of the relevant local community to participate in the process so that a mutually agreed solution is identified and implemented. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Serbia.

A separate, internal grievance mechanism is available for Ivicom employees and will also be made available for contracted workers, once they begin working.

On October 7, 2022, Ivicom received complaints from two residents from Sladinac. The complainant is Nebojša Tomić, who is filing the complaint because mechanization was engaged, for the construction of road infrastructure they trampled the field (c.p no. 550 and 551 CM Golubac) and prevented its preparation for the winter period. The second

complainant is Živorad Marković, who also files a complaint for the same reason. His field is on cp. no. 121 and 122 CM Golubac. A little later, a complaint was made by Ratko Pantić, also from Sladinac. Ratko complains that his plots of land, cp. no. 212, 213, 214 and 148 CM Golubac were trampled. Complaints were reviewed by the Ivicom CLO and site manager and an agreement was reached with the affected parties to resolve the issue.

9 Contact Details for the Project

Name: Dušan Muškatirović
Address: 28 Cara Dušana Street, 12223 Golubac, Serbia
Phone: 064/8170-173
Email: d.muskatirovic@ivicom.at

ANNEXES

Annex 1 – Grievance Form

Reference No: (to be filled in by Ivicom)	
Full Name	
Contact information and preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide postal address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _ _____
Description of incident or grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem?	
Date of incident/grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:

Name: Dušan Muškatirović 064/8170-173
 Nebojša Balabanović 064/555-2933

Address: Branch Ivicom Holding GmbH Golubac, 28 Cara Dušana street, 12223 Golubac, Serbia

Email: d.muskatirovic@ivicom.at, balabanovicn@gmail.com

Annex 2 – Community Investment Fund

To date Ivicom has provided support to various local activities and initiatives in the area of infrastructure improvements, sports, education, culture, hunting/beekeeping and tourism.

At the beginning of 2018, Ivicom will designate an annual community investment budget which will be used to finance local initiatives in the forthcoming year in the two municipalities which will be impacted the most by the Project – Golubac and Kučevo.

Once a year, the municipalities will be asked to publish an invitation to interested local communities, associations, and organisations to submit their proposals for funding from the designated annual budget to Ivicom. Proposals in the following areas will be considered:

- Small community infrastructure improvements
- Education and sports
- Support for vulnerable people (e.g. elderly, disabled, youth or children)
- Environmental protection
- Local customs and traditions
- Tourism development

Initiatives targeting directly affected communities will have priority for funding and these include: Krivača, Dvorište and Snegotin villages belonging to the territory of the municipality Golubac and Rakova Bara and Radenka villages belonging to the municipality Kučevo.

Applicants will be asked to include the following sections in their proposals:

- Name of the local community, organisation, association submitting the proposal and contact details of the responsible person
- Description of the proposed activity
- Duration of the activity and implementation period
- Budget breakdown
- Explanation of how the action is expected to contribute to local development and/or further socially desirable goals
- Other relevant information

Once all proposals are collected, Ivicom will organise a meeting with representatives from both municipalities to discuss and vote on the proposals which will be financed from the community investment fund in the forthcoming year.

The number of proposals to be funded will depend on their respective budgets, i.e. those that jointly fit within the allocated budget may be funded. In choosing the applications for funding, Ivicom and the municipalities will take into account the feasibility of the proposed activity, the sustainability of the action, the number of beneficiaries, and compliance with community investment guidelines.

A list of successful proposals will be published on the official websites of the two municipalities and on Ivicom's website along with a brief description, including the name of the action, location, anticipated implementation period and budget.

The two municipalities will monitor the implementation of activities selected for funding on their territories and will send quarterly monitoring reports to Ivicom. Based on this information, a community investment annual report will be developed by Ivicom describing all funded activities and achieved results. The report will also be published on the company website.

The community investment fund will be continually improved and revised to suit local needs and respond to feedback received from the communities.

Annex 3 – Community Investments Before 2017

DOO IVICOM ENERGY
ZAGUBICA

SPECIFIKACIJA
UPLATA DONACIJA

DATUM	IZNOS	NAPOMENA
06.08.2010	20.000.00	FK ZVIŽD KUČEVO
26.05.2011	250.000.00	JP DIREKCIJA ZA IZGRADNJU GOLUBAC
25.08.2011	80.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
11.11.2011	50.000.00	CRKVENA OPŠTINA ŽAGUBICA
12.04.2012	40.000.00	LOVAČKO UDRUŽENJE JELEN KUČEVO
30.08.2012	90.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
07.05.2013	25.000.00	DŽUDO KLUB KUČEVO
04.06.2013	40.000.00	SABOR VRELA HOMOLJA ŽAGUBICA
21.08.2013	20.000.00	MESNA ZAJEDNICA RADENKA KUČEVO
23.08.2013	150.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
20.09.2013	50.000.00	FK DJERDAP GOLUBAC
11.06.2014	30.000.00	FK DJERDAP GOLUBAC
23.06.2014	40.000.00	CRKVENA OPŠTINA VLAOLE
19.08.2014	150.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
19.08.2014	100.000.00	MESNA ZAJEDNICA RAKOVA BARA KUČEVO
10.10.2014	20.000.00	UDRUŽENJE ŽANKA STOKIĆ RABROVO
16.04.2015	25.000.00	UDRUŽENJE PČELARA ŽAGUBICA
29.05.2015	300.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
15.07.2015	30.000.00	FK DJERDAP GOLUBAC
01.10.2015	20.000.00	ŠAH KLUB VRELO MLAVE ŽAGUBICA
23.10.2015	25.000.00	UDRUŽENJE ŽANKA STOKIĆ RABROVO
15.12.2015	2.194.080.00	OSNOVNA SKOLA B.RADICEVIC GOLUBAC
09.05.2016	15.000.00	UDRUŽENJE LIKOVNIH UMETNIKA ŽAGUBICA
08.06.2016	40.000.00	OSNOVNA ŠKOLA ŽAGUBICA
10.06.2016	300.000.00	CENTAR ZA KULTURU VELJKO DUGOŠEVIĆ KUČEVO
04.07.2016	20.000.00	FUDBALSKI KLUB DJERDAP GOLUBAC
18.07.2016	116.000.00	TURISTIČKA ORGANIZACIJA GOLUBAC
16.08.2016	103.680.00	FK ZVIŽD KUČEVO
27.10.2016	7.500.00	ŠAH KLUB VRELO MLAVE ŽAGUBICA
07.11.2016	20.000.00	UDRUŽENJE ŽANKA STOKIĆ RABROVO
07.12.2016	60.000.00	FK ĐERDAP GOLUBAC
07.12.2016	60.000.00	MZ BRANIČEVO
28.12.2016	100.000.00	MESNA ZAJEDNICA GOLUBAC
28.12.2016	25.000.00	UDRUŽENJE VLAHA I RUMUNA KUČEVO
	4.616.260.00	