

SERBIA SOLID WASTE PROGRAMME LIVELIHOOD RESTORATION PLAN

FINAL DOCUMENT – 20.11.2023.

Ministry of Environmental Protection of the Republic of Serbia

Table of Contents

1	INTRODUCTION	4
2	DESCRIPTION OF THE PROGRAMME COMPONENTS	5
3	EXPECTED ECONOMIC DISPLACEMENT IMPACTS	8
3.1	Presence of Waste pickers at Municipal Waste dumps	8
3.2	Key RWMC and Municipal Waste dump Features Observed During Site Visits	10
3.3	Direct Impacts Associated with the Programme	12
4	BASELINE DATA	13
4.1	Census of Affected Waste pickers	13
4.2	Socio Economic Survey of Affected Waste pickers	15
5	LEGAL FRAMEWORK AND GAP ANALYSIS	22
5.1	Legislation of the Republic of Serbia	22
5.2	EBRD and AFD Requirements	22
5.3	Gaps Between Serbian Legislation and EBRD/AFD (IFC) Requirements	23
6	LIVELIHOOD RESTORATION PRINCIPLES	23
7	ELIGIBILITY FOR ASSISTANCE	24
7.1	Cut off Date for Eligibility	24
7.2	Vulnerable Individuals / Households	25
8	LIVELIHOOD RESTORATION MEASURES AND ENTITLEMENTS	25
8.1	Livelihood Restoration Opportunities and Measures	25
8.1.1	Assistance to Formalise Waste picking Activities	26
8.1.2	Access to Employment and Training	27
8.1.3	Access to Small Grants	27
8.1.4	Other Forms of Assistance	28
8.2	Individual and Household Entitlements	29
9	INSTITUTIONAL ARRANGEMENTS	30
9.1	Overall Responsibility and Management	30
9.2	LRP Implementation Team	31
9.3	RWMCs and MEP	33
10	CONSULTATION ACTIVITIES AND GRIEVANCE MANAGEMENT	33
10.1	Stakeholder Engagement During the Preparation of the LRP	33
10.2	Planned Stakeholder Engagement Activities	34
10.3	Grievance Management Procedure	34
11	MONITORING AND REPORTING	35
11.1	Monitoring	35
11.2	Reporting	37

12	IMPLEMENTATION PERIOD AND BUDGET	37
12.1	Implementation Period	37
12.2	Budget	37
13	ANNEXES	37

1 INTRODUCTION

The Ministry of Environmental Protection of the Republic of Serbia (MEP) is implementing the Serbia Solid Waste Programme which aims at provision of modern solid waste infrastructure compliant with EU standards, provision of improved services and addressing pressing environmental challenges in the solid waste sector, in line with the National Waste Management Programme 2022 – 2031 and Action Plan for the period 2022 – 2024, adopted by the Serbian Parliament (the Programme).

The Programme aims to support the development of an integrated and modern solid waste management system in Serbia, through:

- The establishment of Regional Waste Management Systems articulated around Regional Waste Management Centres (RWMCs), each covering a number of municipalities;
- The establishment of primary sorting / recycling systems;
- Treatment and recovery of biodegradable waste; and
- Development of infrastructure necessary for collection (waste bins, containers, vehicles, recycling yards and transfer stations).

Programme activities are being implemented in connection to six RWMCs in Serbia and municipal waste dumps operated by local public utility companies (PUCs). The municipal waste dumps have been or are expected to be closed, in accordance with the methodology for developing rehabilitation and remediation projects, and waste from those communities will be redirected to the regional landfills, which are, or will be operated by the RWMCs, as presented in Table 1. The closure (and rehabilitation) of municipal waste dumps is not a part of the proposed Programme¹, however this outcome is a direct consequence of the Programme and as such, is being considered in the assessment of potential environmental and social impacts.

RWMC	Municipal waste dump
Regional Landfill Banjica doo, Nova Varoš	4 municipalities: Sjenica, Priboj, Prijepolje and Nova Varoš
Eko Tamnava doo, Ub – responsible for RWMC Kalenić	11 municipalities: Obrenovac, Ub, Vladimirci, Valjevo, Lajkovac, Ljig, Mionica, Osečina, Koceljeva, Barajevo and Lazarevac ²
PUC Rančevo, Sombor	5 municipalities: Sombor, Apatin, Odžaci (Bački Brestovac, Srpski Miletić, Odžaci ³), Kula (Kula, Sivac and Crvenka ⁴), Bač
Regional Landfill Srem-Mačva, Sremska Mitrovica	5 municipalities: Sremska Mitrovica, Šid, Bogatić, Šabac, Ruma
Regional Sanitary Landfill Duboko PUC (Užice)	9 municipalities: Užice, Čačak, Bajina Bašta, Požega, Arilje, Čajetina, Kosjerić, Lučani, Ivanjica

¹ except in Sombor and Sremska Mitrovica, at the sites of the future sanitary regional landfill, as described in the Description of the Programme Components section of the LRP

² During the assignment, the consultants were informed that four more municipalities are planned to be included in the RWMC Kalenić – Mali Zvornik, Loznica, Krupanj and Ljubovija. The formal inclusion of these four municipalities occurred in October 2023, after the LRP assessment and planning activities were already completed. A rapid assessment was carried out and the results are included in Annex 5 of the LRP.

³ In the municipality Odžaci, there are three waste dumps, managed by two public utility companies.

⁴ In the municipality Kula, there are three waste dumps, managed by three public utility companies and one more public utility company which delivers waste to one of the three waste dumps

RWMC	Municipal waste dump
Regional Landfill Pirot, PUC Pirot	4 municipalities: Pirot, Babušnica, Dimitrovgrad and Bela Palanka

Table 1 – RWMCs and Municipal Waste dumps Included in the Programme

The proposed Programme will be financed through a sovereign loan to the Republic of Serbia, provided, in equal measure, by the European Bank for Reconstruction and Development (EBRD) and the French Development Agency (Agence Française de Développement, AFD), jointly referred to as International Financial Institutions (IFIs). As such, the Programme must meet the applicable EBRD and AFD environmental and social requirements and the relevant environmental and social documentation, including assessments and action plans which have been prepared and are available on the EBRD website: <https://www.ebrd.com/work-with-us/projects/psd/52642.html#>

The most significant social impact, which needs to be addressed in accordance with the EBRD Environmental and Social Policy (2019), specifically Performance Requirement No. 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), is the anticipated economic displacement of persons engaging in waste collection at municipal waste dumps which are planned to be closed in the future when waste is redirected to regional landfills.

To ensure that this economic displacement is addressed following the principles of best practice, a Livelihood Restoration Plan (this document) has been developed by the MEP, with assistance from a team of LRP consultants⁵ (the consultants), in compliance both with national legislation of the Republic of Serbia and the requirements of IFIs.

As the Programme is being implemented in six regions of Serbia and numerous municipalities, the current status and planned activities are very different, including different timescales, which also means different times when impacts will occur. The LRP has taken into account all of these differences and where relevant, data and planned activities, are presented on a regional basis, while the overall principles and the general approach to livelihood restoration, will be uniform for all areas.

To assist with the implementation of the LRP, a grant has been agreed between the Government of Serbia and the Government of Switzerland, channeled through the Swiss Agency for Development and Cooperation (SDC) Office in Serbia and implemented by UNOPS, through the Local Governance for People and Nature - PRO Programme.

2 DESCRIPTION OF THE PROGRAMME COMPONENTS

As explained earlier, the Programme is a mix of tailor-made activities for six RWMCs located across different regions in Serbia, who are all at different stages of development. The Programme itself has been divided into two phases, Phase 1 covering RWMC Kalenić, Rančevo, Duboko and Banjica and Phase 2 covering RWMC Srem Mačva and Pirot.

This description aims to provide only an overview of the main Programme activities, especially those that are relevant from the point of view of addressing economic displacement impacts. It is also important to note that the Programme includes additional activities, in Phase 2,

⁵ LINK 011 from Belgrade, Serbia

comprising the procurement of containers and vehicles for municipal collection, to implement primary selection of waste, which are likely to be implemented in locations outside of the six mentioned regions. However, as these impacts are not expected to cause economic displacement, they will not be further elaborated in the LRP.

RWMC Kalenić (Ub)

The Kalenić subproject involves development of a RWMC that will receive mixed municipal waste and will consist of a pre-treatment facility and a sanitary landfill (Kalenić). Once the RWMC becomes operational, the municipal PUCs will continue to collect waste, however mixed waste will be delivered to three transfer stations or directly to the RWMC, while dry waste will be processed within the municipalities. Eko Tamnava, the regional utility company which has been established already, will be responsible for waste transport from the three transport stations, waste treatment, recycling and final disposal of the waste received into the regional landfill.

RWMC Rančevo (Sombor)

The wastedump which will be replaced by the regional landfill in the same location is currently managed by the City of Sombor. A new regional utility company has been formed, which will manage the RWMC in the future. The RWMC is planned to include Mechanical Biological Treatment (MBT), a sorting plant for source-separated packaging waste and sanitary landfill cells, while the existing waste dump will be closed and remediated. Once the RWMC becomes operational, the PUCs will continue to collect mixed municipal waste and primary selected waste (recyclables), and bring both types of waste directly to the RWMC or three transfer stations where RWMC will collect them. At the RWMC, mixed municipal waste will be pre-treated with MBT and primary selected waste will be secondary sorted within a packaging waste sorting facility.

RWMC Duboko (Užice)

This RWMC is already operational and, since 2011, has an operational sanitary regional landfill as well as a Materials Recovery Facility (MRF). The RWMC needs to stabilize the sanitary landfill, construct a leachate treatment plant, a landfill gas treatment plant and a composting plant, as well as modernize the MRF. Once the RWMC is upgraded, the PUCs will continue to collect mixed municipal waste and primary selected waste (recyclables) and bring them to 3 reloading stations and 1 transfer station from where RWMC will collect them, or in the case of Uzice, directly to the RWMC.

RWMC Banjica (Nova Varoš)

The Banjica subproject entails the development of a RWMC, as well as the construction of a sanitary landfill and light infrastructure for waste separation and composting. Once the RWMC becomes operational, the municipal PUCs will continue to collect mixed waste and deliver it directly to the RWMC, or in the case of Sjenica to a transfer station, from where it will be collected by the RWMC. Banjica, the regional utility company which has been established already, will be responsible for waste treatment, recycling and final disposal of the waste received into the regional landfill.

RWMC Srem Mačva (Sremska Mitrovica)

This RWMC is already operational and consists of an operational landfill which is not fully sanitary and a sorting plant for recyclable waste (built but not yet operational) and is operated by an existing regional utility company. The subproject will finance the closure and remediation of the current landfill and the construction of a new sanitary landfill with accompanying upgraded facilities and purchase of equipment, as well as the implementation of source-separation of packaging waste for the City of Ruma. Once the RWMC becomes operational, the PUCs will continue to collect waste and bring it directly to the RWMC or two transfer stations where the RWMC will collect it.

RWMC Pirot (Pirot)

This RWMC is also already operational and consists of an operational landfill which is not fully sanitary and a sorting plant for recyclable waste which is operational, and is operated by an existing regional utility company. The subproject will finance the closure of the current landfill cell 1 and the construction of a new sanitary landfill cell 2, with accompanying upgraded facilities and purchase of equipment. All municipal PUCs will continue to collect waste and bring it directly to the RWMC where it is being treated and disposed of in the regional landfill.

As can be seen in the descriptions above, the currently operational municipal PUCs will not change their roles to the extent that there will be a need to reduce the number of employees. This is also the feedback received from all PUCs through meetings and/or phone calls with PUC managers. Another important point to note is that there will be construction activities in all RWMCs, as well as many new waste management activities in the operations phase of the Programme, including the sorting of waste. These activities will generate employment opportunities which, if planned and implemented appropriately, will be valuable in addressing the economic displacement of waste pickers, resulting from the closure of municipal waste dumps and their inability to continue picking waste in these locations.

The timing of planned activities presented above has been defined and is continually being updated, however, as the closure of municipal waste dumps is not within the framework of the Programme, the timelines for this are unknown. Some municipal waste dumps are no longer operational (and have already been closed for a long time) and this is particularly the case in regions where the regional landfills are already functioning (Duboko and Pirot). For the purpose of planning, Table 2 below presents the planned timelines for key subproject components when RWMCs will become fully operational and when it can be assumed that the municipal waste dumps could close.

RWMC	Municipal waste dump	Regional landfill completed	Possible closure of municipal waste dumps
Banjica (Nova Varoš)	4 municipalities: Sjenica, Priboj, Prijepolje and Nova Varoš	September 2025	First half of 2026
Kalenić (Ub)	11 municipalities: Obrenovac, Ub, Vladimirci, Valjevo, Lajkovac, Ljig, Mionica, Osečina, Koceljeva, Barajevo and Lazarevac ⁶	December 2024	First half of 2025

⁶ During the assignment, the consultants were informed that four more municipalities are planned to be included in the RWMC Kalenić – Mali Zvornik, Loznica, Krupanj and Ljubovija. The formal inclusion of these four

RWMC	Municipal waste dump	Regional landfill completed	Possible closure of municipal waste dumps
Rančevo (Sombor)	5 municipalities: Sombor, Apatin, Odžaci (Bački Brestovac, Srpski Miletić, Odžaci ⁷), Kula (Kula, Sivac and Crvenka ⁸), Bač	December 2025	First half of 2026
Srem Mačva (Sremska Mitrovica)	5 municipalities: Sremska Mitrovica, Šid, Bogatić, Šabac, Ruma	August 2025	First half of 2026
Duboko (Užice)	9 municipalities: Užice, Čačak, Bajina Bašta, Požega, Arilje, Čajetina, Kosjerić, Lučani, Ivanjica	Already operational	Already closed
Pirot (Pirot)	4 municipalities: Pirot, Babušnica, Dimitrovgrad and Bela Palanka	Already operational	Already closed

Table 2 – Timelines for Operation of Regional Landfills and Closure of Municipal Waste dumps

3 EXPECTED ECONOMIC DISPLACEMENT IMPACTS

3.1 Presence of Waste pickers at Municipal Waste dumps

In the initial stages of the assignment, the consultants reviewed all available Programme documents prepared by other consultant teams, to understand where waste picking activities are being undertaken, at municipal waste dumps. Following that, the consultants made further enquires with representatives of already established RMWCs and individual PUCs operating the municipal waste dumps.

As mentioned earlier, a number of waste dumps were already closed a long time ago and this is the case with the municipalities delivering waste at the Duboko and Pirot RWMCs, where regional landfills are already operational. The Duboko landfill itself has restricted access and according to the Director of the RWMC, there are no waste pickers operating there. In Pirot, although the regional landfill is already operational, a number of people still engage in waste picking, through a local recycling association which cooperates with the RWMC⁹. When the RWMC installed and started operating a sorting plant for recyclable waste, some of the waste pickers were formally employed by the RWMC and are still working there.

In addition, even in locations where the regional landfills are not already operational, some municipal waste dumps have been closed already, for different reasons. For example, in the RWMC Banjica (Nova Varoš) area of operation, the municipal waste dump in Prijepolje has already been closed and waste is delivered to the municipal waste dump in Priboj. Nova Varoš does not have a municipal waste dump and waste from that municipality is already delivered to Priboj.

municipalities occurred in October 2023, after the LRP assessment and planning activities were already completed. A rapid assessment was carried out and the results are included in Annex 5 of the LRP.

⁷ In the municipality Odžaci, there are three waste dumps, managed by two public utility companies.

⁸ In the municipality Kula, there are three waste dumpas, managed by three public utility companies and one more public utility company which delivers waste to one of the three waste dumps

⁹ Citizen’s Association Amala from Pirot

The consultants also received information from RWMCs and PUCs that in some of the municipal waste dumps, there are no active waste pickers. This is mostly the case on smaller waste dumps, in more remote locations and where waste dumps are fully fenced and access is restricted. This is the case for a number of waste dumps in the area of RMWC Kalenić, for example in Lajkovac, where the temporary waste dump is next to the wastewater treatment plant, within a fenced complex and with video surveillance.

Finally, following the above review and fact finding activities, the consultants visited all waste dumps where there are or could be waste pickers (photos are available in Annex 1 of the LRP). During those site visits, the consultants met with PUC managers and other relevant staff, as well as the waste pickers who were there on the day of the visit, to explain the assignment and activities which will be implemented, such as the census and socio economic survey. The consultants enquired what preferences people have in terms of employment or other livelihood restoration measures and the responses very largely focused on employment at the PUC or future RWMC, support to access social welfare, with an occasional person stating that they wish to work in another sector, perhaps be supported to start his/her own business and receive some form of vocational training. Based on all site visits carried out, it was determined that all or nearly all of the waste pickers are of a Roma nationality.

As a result of the above activities, it was finally determined that there are active waste pickers at 15 municipal / local waste dumps (three waste dumps are located in one municipality – Kula), within the area of 4 RWMCs, where further LRP development activities would take place. This is presented in Table 3.

RWMC	Municipal waste dump	Possible closure of municipal waste dumps
Banjica (Nova Varoš)	Sjenica and Priboj	First half of 2026
Kalenić (Ub)	Obrenovac, Ub, Vladimirci and Valjevo	First half of 2025
Rančevo (Sombor)	Sombor, Apatin, Odžaci (Bački Brestovac), Kula (Kula, Sivac and Crvenka) and Bač	First half of 2026
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica and Šid	First half of 2026

Table 3 – Municipal Waste dumps Where Waste pickers Operate, by RWMC

At two local community waste dumps in the municipality Kula (Sivac and Crvenka), two households were identified as actively picking waste, one in each location. The consultants spoke to both and obtained their contact phone numbers to be in touch regarding the census and socio economic survey, while in all the other waste dumps, these activities would be organised with assistance from the PUCs.

In the municipality Odžaci, the PUC reported that a small organised waste collector from Apatin occasionally picks up some of the waste at the town waste dump, but he does not engage in waste picking himself. The PUC employees provided the consultants with his contact phone number, so that they can contact him and understand potential impacts on his livelihood in case of closure of local waste dumps. The consultants also met with one large authorised collector company from Belgrade, which is also buying waste collected and sorted by the waste pickers at the waste dumps included in the Programme.

During the course of the assignment, the consultants also visited RWMC Pirot, to learn about their experiences in employing some of the waste pickers on the regional landfill, as well as in

cooperating with the local recycling organisation to buy waste from informal waste pickers still operating at the waste dump or street collectors. These experiences have been factored into livelihood restoration planning presented further in the document.

Table 4 below summarises the municipal and village wastedumps which are not operational or where there are no wastepickers.

RWMC	Municipality / village	Status of wastedump / wastepickers
Banjica (Nova Varoš)	Prijepolje	No active wastedump
	Nova Varoš	No active wastedump
Kalenic (Ub)	Lajkovac	Fenced and guarded site, no wastepickers
	Ljig	No active wastedump
	Mionica	No active wastedump
	Osečina	No active wastepickers
	Koceljeva	Fenced site, no wastepickers
	Barajevo	No active wastedump
	Lazarevac	No active wastedump
Rančevo (Sombor)	Odžaci and Srpski Miletic	No wastepickers
Srem Mačva (Sremska Mitrovica)	Bogatic	No wastepickers
	Šabac	No active wastedump
	Ruma	No active wastedump
Duboko (Užice)	9 municipalities: Užice, Čačak, Bajina Bašta, Požega, Arilje, Čajetina, Kosjerić, Lučani, Ivanjica	All closed, RWMC operational for more than 10 years
Pirot (Pirot)	4 municipalities: Pirot, Babušnica, Dimitrovgrad and Bela Palanka	All closed, RWMC operational for more than 10 years

Table 4 – Municipal Waste dumps Which are Closed or Where Waste pickers do Not Operate, by RWMC

3.2 Key RWMC and Municipal Waste dump Features Observed During Site Visits

The Banjica regional landfill will be constructed on public land, in a remote, uninhabited location, by the river Lim and is less than 1 km from the existing Priboj waste dump, which is in a similar surrounding. The Priboj waste dump currently accepts waste from Nova Varos, Prijepolje and Priboj and although with completely open access, probably because of its remote location is not a place where numerous people come to pick waste. Several couples of waste pickers who used to operate on the Prijepolje waste dump until it was closed, continued these activities in the new location. The waste dump in Sjenica is also in an uninhabited area, next to the regional road leading to the town Sjenica and access is deterred with a fence and gate. One waste picker regularly operates there and is occasionally joined by his son.

The Kalenic regional landfill will be constructed on public land, previously used by the Mining Basin Kolubara, for depositing mining tailings. The Ub waste dump is located at the edge of a settlement, inhabited mainly by Roma families many of whom have members living and working abroad (in Austria and Italy). The waste dump is not well organised and is completely

open to anyone who decides to access it. There are waste pickers who operate there regularly and some come only occasionally, but they all live in the mentioned settlement. The Vladimirci waste dump is very similar, completely open and not well organised. However, because of its remote location, in an uninhabited area, there is only one elderly couple who regularly collect waste there and who are well known to the PUC guard.

The Obrenovac waste dump is a complete opposite. It is a fenced and organised space with access only with the PUC permission. There are also between 10 and 20 people who pick waste there, however they can only do so with permission and after being recorded by the waste dump guard with a presentation of their ID card. The Valjevo waste dump is similar and there are several couples (extended family) working there daily, led by one person who used to be an employee of the PUC and is now a registered small sole trader. He is paid for the collectibles and then distributes earnings to the rest of the waste pickers.

The waste dump in Sombor, in the same location where the planned regional landfill will be constructed, is in a remote and uninhabited location and access is deterred by a fence and gate. The waste dump is well organised and probably as a result of its location is not a place where people come to pick waste occasionally. There are several couples operating at the waste dump. The Apatin waste dump is a complete opposite and is similar to the Ub waste dump, in the sense that it is also located on the edge of a large Roma settlement and is completely open for access to anyone. As in Ub, some waste pickers are there regularly, but there are also those who engage in this work occasionally, as needed, and all of the waste pickers live in the neighbouring settlement. The waste dump in Odžaci, in the village Bački Brestovac, two waste dumps in Kula, in the villages Crvenka and Sivac, and the waste dump in Bač, are small local community waste dumps and although open, are not frequented by a significant number of waste pickers. In Crvenka and Sivac, members of one household (in each location) engage in these activities, while in Bački Brestovac, two to three women, engage in this work. In Bač, there are also several couples who engage in waste picking. The remaining waste dump in Kula is more similar to the larger waste dumps, located in a remote area, and completely open. There are often around 5 to 10 people picking waste there and they are all from the municipality Apatin.

The Sremska Mitrovica waste dump is also a large waste dump in a remote location, fenced and with restricted access. This is also where the future regional landfill will be. There are usually 10 to 15 people who collect waste there and many are from the municipality Ruma, who moved to this location when the Ruma waste dump was closed. The Šid waste dump is in a remote location and there are several couples who are regularly engaging in waste picking there.

There are no people living on any of the waste dumps and no physical relocation will be necessary. On most waste dumps, the waste is being sold directly at the waste dump, i.e. the buyers are coming directly to the waste dump to buy most of the collected waste there. There are a few exceptions and they are especially pronounced in smaller, more remote waste dumps. In Sjenica, the waste picker collects metal and delivers it to the buyer in town and in Vladimirci, the elderly couple loads the collected waste to a tractor trailer and delivers it to buyers, sometimes taking the waste to their home, in the interim.

3.3 Direct Impacts Associated with the Programme

The Programme will result in direct economic displacement, i.e. the loss of assets or access to assets that generate income or a means of livelihood for up to 150 informal waste pickers and their household members (an additional estimated 250 individuals)¹⁰. The economic displacement of waste pickers at these waste dumps cannot be avoided and therefore measures will be implemented to minimise it, as described in this LRP.

The reasons why this LRP does not contain a finite number of affected waste pickers and their household members is explained in more detail further in the document, together with a proposed strategy for defining a final list of people who will be entitled to assistance under the LRP.

Most of the waste dumps included in this assignment are small and do not generate a lot of sorted waste. The waste pickers sell their collected waste to the PUCs or to different local companies, however the quantities are not so significant that they would impact the operations of these local businesses. As mentioned earlier, in the municipality Odžaci, it was reported that a small organised collector from Apatin, who also buys waste from waste pickers at nearby waste dumps when they call him, sometimes picks up some of the waste when passing by the Odžaci waste dump. The consultants tried to establish contact with him by phone, however there was no reply. The actual impact on his business is not expected to be significant, as he buys waste at many different locations, including from street collectors or even directly from households, which will not change as a result of the Programme.

In locations where the waste dumps are larger, waste is often bought by larger authorized collection companies which have an interest in buying larger quantities. As mentioned before, the consultants met with an authorised large collection company from Belgrade that buys some of the waste from the affected waste dumps, to discuss impacts. According to one of the owners of this company, the amount of waste generated at all these locations is minimal compared to the company's total business portfolio, which is mainly dependent on collection of waste directly from large waste generators such as factories, businesses, etc. and they do not expect that their business will be significantly impacted with the closure of the waste dumps. This is more so as they plan to continue to cooperate with the PUCs and RWMCs if possible in the buying of sorted waste in the future.

The consultants also explored possible land acquisition impacts associated with the Programme. Some land acquisition is possible for the expansion of regional landfills or for the transfer stations. However, based on the feedback that has been received, the land that is being or will be used for the Project is in most cases public land. The land to be used for the regional landfill in Nova Varoš and in Ub is public land. The regional landfills in Sombor and Sremska Mitrovica will be located at the location of existing municipal waste dumps which will be expanded to nearby unused land. With regards to the transfer stations, they either already exist, or the locations have not been identified yet, although in many of the cases, they are planned to be located at the locations of the municipal waste dumps which will be closed. In any case, it is not expected that there could be any significant impacts in relation to land acquisition and the only action point is to review the newly identified locations as they become known, to

¹⁰ The census recorded 138 individuals engaged in waste picking and several more are known to exist but have not been recorded, reaching the number of 150. On average, two persons engage in this activity in each household. This would mean that up to 75 households can be impacted. An average household has 5 members, meaning that a total of 375 persons could be impacted, i.e. 150 waste pickers and up to 250 of their household members.

confirm there are no impacts or to address any potential impacts in accordance with IFI requirements.

4 BASELINE DATA

4.1 Census of Affected Waste pickers

The census of affected waste pickers was organised at different times in the various regions and lasted between two and three months. During this period, PUC employees, in most cases waste dump guards, were asked to record the presence of waste pickers at the waste dump every day. The guards were chosen, as they are the employees who are regularly present at the waste dumps and communicate with the waste pickers. In some of the waste dumps, a daily recording of waste pickers is already conducted by the PUC. This is the case in the more organised waste dumps, which are fenced and where access is not possible without the permission of the PUC, through a main gate. In these locations, the results of the census are the most reliable.

The period in which the census was organised at each location is provided in Table 5 - Census Period by Municipal Waste dump and RWMC below.

RWMC	Municipal waste dump	Census period
Banjica (Nova Varoš)	Sjenica	September 2022 to November 2023
Banjica (Nova Varoš)	Priboj	October 2022 to January 2023
Kalenić (Ub)	Obrenovac	November 2022 to January 2023
Kalenić (Ub)	Ub	November 2022 to January 2023
Kalenić (Ub)	Vladimirci	November 2022 to January 2023
Kalenić (Ub)	Valjevo	November 2022 to January 2023
Rančevo (Sombor)	Apatin	November 2022 to February 2023
Rančevo (Sombor)	Odžaci (Bački Brestovac)	October 2023 to December 2023
Rančevo (Sombor)	Kula	November 2022 to January 2023
Rančevo (Sombor)	Sombor	November 2022 to January 2023
Rančevo (Sombor)	Bač	November 2022 to January 2023
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica	January 2023 to March 2023
Srem Mačva (Sremska Mitrovica)	Šid	January 2023 to March 2023

Table 5 - Census Period by Municipal Waste dump and RWMC

A total of 138 waste pickers (of whom 41% women) were recorded through the census as persons who engaged in waste picking at 13 municipal waste dumps. A total of 79 individuals (57%) engaged in these activities at least 10 days per month, of whom 35% were women. Based on an analyses of last names and places of residence, and when cross checking with the data from the socio economic survey, it can be concluded that in most cases, at least two persons from a given household are engaging in waste picking, often men and women who are spouses or life partners. The recorded persons live in a total of 13 municipalities in Serbia and all of the municipalities are the ones where the waste dumps are located or surrounding municipalities.

A total of seven waste pickers have registered residence in a different municipality than where they actually live. Of the recorded waste pickers, a total of 21 have registered residence in municipalities which are not benefiting from the Programme, in the sense that their waste dumps are not within the RWMCs where Project activities will take place (1 from Zrenjanin and 20 from Vrbas).

Of the 138 waste pickers who were recorded by the census, only 64 were included in the socio economic survey at a later date, meaning that they were either interviewed or were among the members of an interviewed waste picker's household. This is described in more detail in the following section of the LRP. The complete overview of the number of waste pickers recorded in each location is provided in Table 6, while the full list with names and number of days worked each month is provided as Annex 2 of the LRP.

RWMC	Municipal waste dump	Number of recorded waste pickers	of whom women	More than 10 days each month	of whom women
Banjica (Nova Varoš)	Sjenica	3	0	2	0
Banjica (Nova Varoš)	Priboj	6	2	6	2
Total: Banjica		9	2	8	2
Kalenić (Ub)	Obrenovac	34	19	0	0
Kalenić (Ub)	Ub	4	0	2	0
Kalenić (Ub)	Vladimirci	2	1	2	1
Kalenić (Ub)	Valjevo	6	3	6	3
Total: Kalenić		46	23	10	4
Rančevo (Sombor)	Apatin	11	5	9	4
Rančevo (Sombor)	Odžaci (Bački Brestovac)	3	3	3	3
Rančevo (Sombor)	Kula	20	6	18	4
Rančevo (Sombor)	Sombor	8	4	7	3
Rančevo (Sombor)	Bač	6	2	6	2
Total: Rančevo		48	20	43	16
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica	22	7	5	1
Srem Mačva (Sremska Mitrovica)	Šid	13	5	13	5
Total: Srem Mačva		35	12	18	6
TOTAL:		138	57	79	28

Table 6 – Census Results by Municipal Waste dump and RWMC

Based on previous field visits, it is also known that there is one household of four members engaged in waste picking on the waste dump in the village Crvenka, as well as a household of multiple members engaged in waste picking on the waste dump in the village Sivac, both in the municipality Kula. These waste dumps are small, in remote locations and although access is declaratively prohibited (with warning signs at entrances), they can be easily accessed by foot.

The consultant team was in touch with the head of the household in the village Crvenka, by phone several times, however, in the end he decided that he and his household members will not participate in the census and survey. The household in Odžaci was also contacted by the consultants several times by phone, however the user of the phone number was always unavailable.

The census is often used as the cutoff date to determine eligibility to assistance provided under the LRP. However, there are a number of constraints in relation to the data collected during the census for this Project, which is why the consultants believe that this activity cannot be used as the basis for declaring the cutoff date for LRP entitlements. Another approach for setting the cutoff date is suggested, as described in section 7 of the LRP.

The constraints in relation to the census activity, are as follows:

- The individuals who engage in waste picking do not regularly engage in these activities, every month and throughout the year. The census activity covered only a few months and only one to two seasons, while there is a strong possibility that there are others, who engage in the activity during other times of the year. The rate at which someone engages in waste picking depends highly on personal circumstances, and most of all on the lack of other, better livelihood options at that moment (if someone lost access to other work, to social welfare, etc.).
- The fluctuation of individuals who engage in waste picking is so high that by the time some of the waste dumps are ready for closure, the persons who will be impacted the most, could be completely different than the people who engage in the activity at this moment and who may move on to other locations or turn to other livelihood sources in the meantime.
- The census did not involve checking of personal documents (except in a few locations, where this is the regular practice to allow entrance into the waste dump) and the names and other data (residence) were recorded based on the knowledge of the guards and the statements of the waste pickers themselves. Later, when comparing the data with the survey data, it is clear that there are inconsistencies and the reliability of data is not strong enough.
- The quality of recorded data varies in the waste dumps. As mentioned, in some locations access is regulated and data is more reliable. However, there are locations where the waste dumps are completely open and where the waste pickers can go unnoticed by the guards or anyone else. In addition, not all guards invested the same level of effort in recording the waste pickers, some recorded names as asked to by the waste pickers, rather than based on actual presence at the waste dump (adding the names of household members in case they would be able to benefit from the activity in the future), in some locations the waste pickers were not cooperative and did not agree to be registered, etc.

4.2 Socio Economic Survey of Affected Waste pickers

The socio economic survey was carried out in the period between 22.03.2023. to 27.04.2023. during working days, in the earlier part of the day when most of the waste pickers are active, by a total of three trained surveyors. The PUCs were informed a few days in advance and asked to pass the word on to the waste pickers who could inform those not present at the waste dump that day. In some locations it was necessary for the surveyors to visit several times or even schedule interviews by phone directly with the waste pickers, to capture those who had been absent during the first visit.

As mentioned earlier, the consultants explained the purpose and main features of the survey activity to PUC employees and waste pickers during the preliminary site visits. The surveyors repeated this information to each interviewed person, explained the voluntary nature of the survey, the right to decline to answer any of the questions and the relevant data protection clauses. The surveyed individuals were asked to sign the survey form providing consent for the data to be used for the purpose of planning livelihood restoration and to allow the data to be presented in aggregate form in the LRP, without disclosing personal information. It is important to highlight that all information was recorded as presented by the interviewed person, without insight into any documents or any request for proof of the given statement.

A total of 52 interviews (28 men, 24 women) were carried out however, since two waste pickers (one of whom a woman) began the survey activity but then decided to withdraw their participation, the final number of interviews is 50 (27 men, 23 women). It also has to be noted that between 15 and 20 waste pickers declined to participate in the socio-economic survey, despite explanations of why the survey is being carried out, from the consultants in the first round of site visits, from the surveyors at the time of the survey and even the PUC staff at the waste dumps. A total of 29 of the surveyed individuals provided a contact phone number.

As the interviews included information on all household members, other waste pickers (belonging to the household of the interviewed one) were also captured by the survey and a total of 93 individuals, who engage in waste picking, were recorded. The survey captured a total of 64 individuals who had previously been recorded by the census activity, while the remaining 29 individuals (31%) were newly recorded. This shows that the data collected by the census may not be as reliable as necessary to use it as a basis for the cutoff date, but also that there is significant fluctuation of waste pickers who operate at the municipal waste dumps and those who are not willing to cooperate.

Detailed information about the number of survey interviews and the number of covered waste pickers is provided in Table 7 below.

RWMC	Municipal waste dump	Number of survey interviews	of whom women	Number of covered waste pickers	of whom women
Banjica (Nova Varoš)	Sjenica	2	0	2	0
Banjica (Nova Varoš)	Priboj	2	0	5	2
Total: Banjica		4	0	7	2
Kalenić (Ub)	Obrenovac	9	5	15	8
Kalenić (Ub)	Ub	4	4	5	4
Kalenić (Ub)	Vladimirci	1	0	2	1
Kalenić (Ub)	Valjevo	4	2	8	3
Total: Kalenić		17	11	30	16
Rančevo (Sombor)	Apatin	3	1	8	2
Rančevo (Sombor)	Odžaci (Bački Brestovac)	3	3	4	3
Rančevo (Sombor)	Kula	4	1	7	2
Rančevo (Sombor)	Sombor	2	1	3	2
Rančevo (Sombor)	Bač	2	0	6	2

RWMC	Municipal waste dump	Number of survey interviews	of whom women	Number of covered waste pickers	of whom women
Total: Rančevo		14	6	28	11
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica	12	5	20	9
Srem Mačva (Sremska Mitrovica)	Šid	3	1	8	4
Total: Srem Mačva		15	6	28	13
TOTAL:		50	23 (46%)	93	42 (45%)

Table 7 – Survey Interviews and Covered Waste pickers by Municipal Waste dump and RWMC

The surveyed individuals were asked to provide the address where they (and their household members) actually reside and their official place of residence, as registered with the police. The place where they live is important from a practical standpoint, i.e. it is the place where further contacts will have to be carried out, to develop and implement individual livelihood restoration plans. The place where they are officially registered is important as it is the local self-government (municipality) that has the responsibility for providing assistance and services to the affected waste picker and his/her household. It is the location where an individual can apply for and receive social assistance, education, health care, unemployment assistance, etc. It is important to note that the survey did not record the official place of residence of each individual member of a household and while there may be some whose data differs from the rest of the household, the number of such cases is not expected to be significant. In addition, it is important to note that apart from two for whom this information was not provided (is unknown), all other adults covered by the survey have personal documents, meaning that they have an officially registered address.

A detailed overview of the municipalities where households live and where they are registered, broken down by the municipal waste dump where they collect waste, is provided in Table 8 below. A total of 4 households have registered residence in municipalities which are not going to benefit from Project activities (Zrenjanin, Vrbas and Mali Idoš) and where encouraging local self governments to place additional efforts into assisting the waste pickers, may be necessary.

In five out of 13 waste dumps (Odžaci, Kula, Sombor, Bač and Sremska Mitrovica) there are waste pickers who do not live/have registered residence in the same municipality where the waste dump is located, but in all those cases, except one, they live/have registered residence in a nearby municipality.

RWMC	Municipal waste dump	Living in a municipality	Registered residence in a municipality
Banjica (Nova Varoš)	Sjenica	1 HH living in Sjenica	1 HH registered in Sjenica
Banjica (Nova Varoš)	Priboj	2 HH living in Prijepolje	2 HH registered in Prijepolje
Kalenić (Ub)	Obrenovac	9 HHs, all living in Obrenovac	9 HHs, all registered in Obrenovac
Kalenić (Ub)	Ub	4 HH living in Ub	4 HH registered in Ub
Kalenić (Ub)	Vladimirci	1 HH living in Vladimirci	1 HH registered in Vladimirci
Kalenić (Ub)	Valjevo	4 HH living in Valjevo	4 HH registered in Valjevo

RWMC	Municipal waste dump	Living in a municipality	Registered residence in a municipality
Rančevo (Sombor)	Apatin	3 HHs living in Apatin	3 HH registered in Apatin
Rančevo (Sombor)	Odžaci (Bački Brestovac)	3 HH living in Odžaci	2 HH registered in Odžaci 1 HH registered in Zrenjanin
Rančevo (Sombor)	Kula	2 HH living in Vrbas 1 HH living in Kula 1 HH living in Mali Idoš	2 HH registered in Vrbas 1 HH registered in Kula 1 HH registered in Mali Idoš
Rančevo (Sombor)	Sombor	2 HHs living in Apatin 1 HH living in Odžaci	2 HH registered in Apatin 1 HH registered in Odžaci
Rančevo (Sombor)	Bač	1 HH living in Bač 1 HH living in Apatin	1 HH registered in Bač 1 HH registered in Apatin
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica	6 HH living in Sremska Mitrovica 6 HH living in Ruma	6 HH registered in Sremska Mitrovica 6 HH registered in Ruma
Srem Mačva (Sremska Mitrovica)	Šid	3 HHs living in Šid	3 HHs registered in Šid

Table 8 – Municipalities of Actual and Registered Residence, by Municipal Waste dump and RWMC

A total of 33 households live in houses/apartments owned by one of the household members and a further five households live in houses/apartments owned by family members (parents) who do not reside with the household. A further seven households rent and three live in social apartments (provided by the municipality), while two households did not provide the information. For those who live in social apartments it is extremely important to note that their right to live in those apartments is conditioned by their level of income and causing any changes in income through livelihood restoration measures, must be considered carefully and accepted by the household.

Three households of the 50 covered by the survey did not provide information about their household members (in Priboj and Sjenica) other than those who engage in waste picking and have been excluded from the analysis of data on household members. However, they have been included in the analyses of all other relevant data, including that which pertains to individuals who engage in waste picking.

The 47 surveyed households (excluding the 3 who did not provide the relevant data) comprise 228 individuals (47% female) and the average household counts 4.9 members which is almost double the national average of 2.65 (population census 2022). As can be seen in Table 9 below, there are no regional differences in the sizes of the households that stand out. The greatest number of households have five or two members, followed by those who have four or six members. There are three single headed households and two of them are single men (48 and 68 years old) and one is a single woman (56 years old).

RWMC	Municipal waste dump	Number of HHs with given number of members										
		1	2	3	4	5	6	7	9	11	12	13
Kalenić (Ub)	Obrenovac		2	2	1		3			1		
Kalenić (Ub)	Ub		1			2	1					
Kalenić (Ub)	Vladimirci		1									

RWMC	Municipal waste dump	Number of HHs with given number of members										
		1	2	3	4	5	6	7	9	11	12	13
Kalenić (Ub)	Valjevo		1	1	1		1					
Rančevo (Sombor)	Apatin				1			1				1
Rančevo (Sombor)	Odžaci (Bački Brestovac)	1		1				1				
Rančevo (Sombor)	Kula	1		1					2			
Rančevo (Sombor)	Sombor		1			1						
Rančevo (Sombor)	Bač					1		1				
Srem Mačva (Sremska Mitrovica)	Sremska Mitrovica	1	2		3	4	1	1				
Srem Mačva (Sremska Mitrovica)	Šid					1		1			1	
TOTAL:		3	8	5	6	9	6	5	2	1	1	1

Table 9 – Sizes of Households, by Municipal Waste dump and RWMC

A total of 19 households (40%) comprise of more than two generations, i.e. adult children live with their spouses and children, as well as with their parents, or parents in law. When looking at the age of spouses (life partners) and parents, it can be concluded that many enter into such relationships and have children at a very young age. As a result, in the multigenerational households, there are very young grandparents, who gained this status when they were in their early thirties.

The average age of all surveyed household members is 23,8 which is far below the national average of 43,5 (population census 2022), when excluding 21 individuals whose age was not provided. The oldest person is 80 years old, while the youngest is a baby of only a few weeks. Minors under 15 years of age make up 37% of household members, while another 7% include minors between 15 and 18 years of age. Only 4% of household members are 65 and older (8 individuals of whom 2 are women). The remaining 52% of household members are working age population between the ages of 18 and 64.

A total of 49 individuals (approx. 20%) were reported as having a chronic illness or disability, of whom 24 women (close to 50%). The most common difficulties that were reported were heart problems, hypertension, diabetes, asthma and rheumatism or back/joint pain. One household reported having two members, both male, with mental disabilities, one of whom is an adult and receives financial disability allowance. There are a total of seven single parent households with small or school aged children. In all cases, these are women headed households, between the ages of 23 and 43 and only in one household, the mother of the head of the household is also living with them. There are two such households that include 4 and 5 small and school aged children.

Only 8 minors (3.5%) do not possess personal documents (birth certificate, health care card or similar) and for 7 individuals this information was not provided. All other household members have valid personal documents.

A total of 4 children under 8 years of age attend kindergarten or preschool, while 39 do not. Of the 38 children between the ages of 8 and 15, a total of 37 are still attending school, while only 1 has dropped out after completing 7th grade. A total of 6 individuals (4 female) between ages 16 and 18 continue to attend school, two in primary school and four in secondary school. One additional waste picker (19 year old female) is close to completing primary school (adult education).

Of those who no longer attend school, 21% have never attended school (of whom 58% women), 14% have completed between one and four grades of primary school, 14% have completed between five and seven grades of primary school, 47% have completed the obligatory primary school (grades one to eight), while only 4% have completed secondary school (of whom only one female). Of the individuals who completed secondary school, two are professional drivers and one is a welder.

A total of 72 individuals (28 of whom are women) reported having additional skills. Most of the men reported having a B category driver's license (19 individuals) and skills in construction work (5 individuals) or physical and/or seasonal agricultural work (18 individuals). One individual stated that he is familiar with car repairs and electrical installations, while one reported knowing how to do anything. Women mostly reported having skills in seasonal agricultural work (16 individuals) and house work, cleaning, child care, while two reported having a B category driver's license.

Waste picking is a primary source of income for 88 individuals of whom 38 women (43%). Five more persons reported waste picking as a secondary source of income (social welfare being the primary source of income), of whom 4 women. Six minors (under 18 years of age), 3 male and 3 female, are engaged in waste picking. One is 14 years old (female) and all others are 16 years old. Two are still attending primary school while one is attending secondary school.

A total of 39 individuals, almost equally men and women, reported social welfare which includes child allowance and disability allowance, as a primary source of income. Only three persons reported employment as a primary source of income and one reported pension as a primary source of income. One person reported seasonal fruit picking as a primary source of income. A further 19 people reported agricultural works, including fruit picking as a secondary source of income. Reported secondary sources of income include construction works or other types of physical works, including cleaning, wood cutting, etc.

The reported monthly net income of an individual derived from waste picking varies greatly, equally for men and women, between 1,000 RSD (approx. 8.5 EUR) and 50,000 RSD (approx. 420 EUR). The reported average value is around 18,000 RSD (approx. 150 EUR), however the mean value is 12,500 RSD (approx. 100 EUR)¹¹.

The amount someone will earn from waste picking in one month depends on many factors, including the location, the type and amount of collected waste, the current selling price, the number of days worked, etc. Amounts reported for other sources of income are scarce and no meaningful conclusions can be drawn from them. However, what is certain is that a combination of waste picking and other sources of income, particularly social welfare and

¹¹ These amounts correspond to the results of an earlier study published by the HELP mission in Serbia, in December 2017 (The Assessment of the Socio Economic Status of Informal Waste Collectors in Serbia), in which the authors point out that a certain percentage of underreported incomes (amounts of collected waste) can be assumed.

earnings from seasonal or occasional agricultural or other work, is how most waste pickers derive their income. The net minimum wage in Serbia in 2023 has been set at around 300 EUR.

A total of 63 working age individuals covered by the survey (over 50%), of whom almost half are women, reported being registered with the national employment agency. This is a condition for some of the waste pickers to be able to receive social welfare, as unemployed individuals.

In terms of the type of collected waste, the waste pickers collect everything that can be sorted and sold, from PET, paper, glass, metal to used clothing and household items. The vast majority of waste pickers have been engaging in this activity for a very long time – 43% between 20 and 30 years and another 30% between 10 and 20 years. The remaining 27% have engaged in this activity for less than 5 years, however these are mainly younger individuals. From discussions with the waste pickers, it can be concluded that engaging in this activity is passed on from one generation to another and someone who starts in waste collection, often remains in it for his/her life.

In terms of the type of assistance they would like to get for themselves and their household members, the majority asked for options for employment in the PUC or the future RWMC. A limited number of individuals requested assistance to start up their own business (car repair), training (operating construction machinery or hairdressing for women) and employment based on new skills, while one household asked for a donation of domestic animals (cows). A significant number of interviewed individuals also requested social welfare for at least some household members, as in their view, this is the most secure household income.

Additional observations from the site visits, the census and the socio-economic survey are:

- A significant percentage of people do not operate at the waste dump regularly. Around 30% of people were not covered by the census, but were covered by the socio-economic survey and almost the same percentage were covered by the census but were not present, or declined to participate in the survey;
- It is noticeable that a significant number of people do not trust that the waste dumps will be closed at all and/or that anything will be done to assist them when that time comes. It is hoped that this can be overturned once LRP implementation begins and some people start receiving assistance;
- A part of the waste pickers declined to participate in the socio-economic survey because they do not want to be recorded anywhere for different reasons (problems with the law, fear of losing social welfare or other benefits, etc.);
- A significant number of people cooperate closely with the PUC employees and waste dump guards and help in the organisation of the waste dumps, putting out fires, reporting any other problems that occur in these locations, etc.;
- There are some differences in the type of waste that people collect, depending on the region (those in the north collect mostly PET, while those in the southwest collect mostly metal). This also depends on the sizes of waste dumps and how close they are to larger settlements and the type and quantity of waste generated in such environments;
- Most waste pickers want to continue to engage in waste picking because they have never considered other options. It was necessary to discuss this at great length during the joint meetings and the survey, so that they could understand that there may be other options. It will be necessary to invest time and patience into convincing individuals that with little assistance, there are other activities they can consider engaging in. This will probably be

the most challenging and the most useful task in the preparatory stage of LRP implementation;

- The implementation of health and safety measures differs at different waste dumps. It is acceptable in the larger, better organised waste dumps, and nonexistent in most others, which prevail.

5 LEGAL FRAMEWORK AND GAP ANALYSIS

5.1 Legislation of the Republic of Serbia

Serbian laws, like most other national laws in the region and wider, does not make any explicit provisions to assist or compensate informal livelihoods negatively impacted by the activities of infrastructure projects. The Serbian Constitution, in Article 60, guarantees the freedom to work and all associated rights, i.e. dignity at work, safe and healthy working conditions, necessary protection at work, limited working hours, daily and weekly rest, paid annual leave, fair compensation for work and legal protection in case of termination of employment. These rights are further elaborated in the relevant labour and employment legislation, particularly the Labour Law of the Republic of Serbia¹².

In terms of other forms of assistance that can be provided to vulnerable individuals engaged in waste picking under national legislation, they primarily relate to the provision of social protection payments and other forms of social protection services, available under the Social Protection Law of the Republic of Serbia¹³. Assistance with employment can also be provided under the Law on Employment and Unemployment Insurance of the Republic of Serbia¹⁴, which also regulates the types of social assistance that can be provided in case of unemployment. Serbia also has a set of other laws under which affected people can be assisted to improve their living standards, i.e. access to health care, education, personal documentation, etc.

Stakeholder engagement in relation to infrastructure projects under Serbian law is organised during the project planning and EIA permitting process and consists of disclosure of plans / documents and organisation of public consultation meetings. The right to information, i.e. that everyone shall have the right to be informed accurately, fully and timely about issues of public importance is guaranteed to all citizens under the Law on Free Access to Information of Public Importance¹⁵.

5.2 EBRD and AFD Requirements

EBRD requirements pertaining to economic displacement (contained in the Performance Standard 5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), relevant for this Project can be summarised as follows:

¹² Official Gazette of the RS No. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017, 113/2017 and 95/2018

¹³ Official Gazette of the RS No. 24/2011, 117/2022)

¹⁴ Official Gazette of the RS No. 36/2009, 88/2010, 38/2015, 113/2017 and 49/2021

¹⁵ Official Gazette of the RS No. 120/2004, 54/2007, 104/2009, 36/2010

- to avoid or, at least minimise project induced economic displacement whenever feasible by exploring alternative project designs; where displacement is unavoidable, an appropriate livelihood restoration action plan should be developed;
- to mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to land, physical assets or natural resources by ensuring that livelihood restoration activities are planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;
- to improve or, at a minimum, restore the livelihoods, income earning capacity and standards of living of displaced persons, including those who have no legally recognisable rights or claims to the land (present in the project affected area at the time of the cutoff date), to pre-project levels and support them during the transition period;
- to make special provisions for assisting disadvantaged or vulnerable individuals or groups (present in the project affected area at the time of the cutoff date) that may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of livelihood assistance and related development benefits;
- to establish a grievance mechanism to receive and address in a timely fashion specific concerns about displacement and livelihood restoration that are raised by displaced persons.

The above list is only a summary of the EBRD PR 5 requirements and is qualified by reference to the full text of the applicable policy¹⁶.

In the case of this Project, AFD has agreed to recognise EBRD's E&S Policy, including the most relevant PR 5, as the benchmark standard that must be complied with.

5.3 Gaps Between Serbian Legislation and EBRD/AFD Requirements

The non recognition of informal economic activities of waste pickers is the main gap between Serbian law and EBRD / AFD requirements, which is being addressed through the development of this Livelihood Restoration Plan. Although these income earning activities are not recognised by Serbian law, under the EBRD / AFD policy, all people whose livelihoods are affected by the Programme must be assisted to improve or at least restore these livelihoods to pre-project levels.

The LRP also includes specific provisions required either by Serbian legislation or the EBRD / AFD Environmental and Social Policy, such as regular consultations with affected people, the establishment and implementation of a project grievance mechanism, as well as monitoring the implementation of livelihood restoration measures and reporting on progress.

6 LIVELIHOOD RESTORATION PRINCIPLES

Key principles committed upon by the Programme in respect of livelihood restoration, which will be complied with in the implementation of this LRP, are:

- Individuals who are recorded as impacted by the Programme, on a certain future date, as presented in section 7 below, are eligible to receive livelihood restoration assistance as described in this LRP;

¹⁶ The full text of the EBRD 2019 Environmental and Social Policy is available at: <http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

- Meaningful consultations will be carried out with affected individuals throughout the implementation of the LRP;
- Specific assistance will be provided to vulnerable individuals;
- All livelihood restoration assistance will be provided equally to men and women and in accordance with their specific needs;
- A grievance mechanism will be implemented through which all affected people can submit their complaints and grievances in relation to livelihood restoration and expect a prompt response;
- Monitoring and reporting of all livelihood restoration activities will be regularly carried out and reports will be submitted to EBRD.

7 ELIGIBILITY FOR ASSISTANCE

7.1 Cut off Date for Eligibility

Setting a cutoff date for eligibility is one of the most important parts of livelihood restoration planning, to ensure that those who are truly affected by a project receive adequate assistance and to ensure that those who are responsible for providing assistance have a defined scope of responsibility.

However, as described in previous LRP sections, the cutoff date for eligibility, which would serve the above purpose, cannot be set at the time of developing this LRP, primarily due to the fact that economic displacement will not occur in at least a year and a half to two years. As witnessed during the development of this LRP, the fluctuation of people who operate at municipal waste dumps is significant and if the cutoff date was set now, there is a high possibility that people who will be impacted by the closure of municipal waste dumps would not be recognized as eligible. In addition, it is necessary to confirm the identity of affected people which can only be done after establishing a level of trust on an individual level.

What is clear is that, to ensure livelihood restoration for affected people, it is necessary to include their household members in the planning process and implementation, to increase the chances for waste picker households to re-establish or improve their standard of living. This means that eligibility should be defined at an individual, but also at the household level.

To address the above, implementation of the LRP will begin following the adoption of the document, but the process of including new waste pickers and their households will continue until the impact occurs, i.e. until the waste dumps are closed. This should be the cutoff date for eligibility and the time when final lists of affected people and their household members will be closed and when the final scope of responsibility for the Programme will be defined. This date will be different for each municipal waste dump and will be announced and explained to all affected people by the Programme.

The positive effect of this approach will be that livelihood restoration will start even before the occurrence of the impact, giving people the opportunity to move on to other sources of livelihoods before they lose their current source. This is particularly important because livelihood restoration takes a longer time to be achieved than other outcomes of resettlement.

It should also be said that based on experience from other similar assignments, the fact that impacts will not occur immediately when LRP implementation begins will also be a barrier to working with some individuals and their households who will not believe that the impact will occur at all and will not be willing to engage with the Programme on livelihood restoration. A

part of individuals who have this attitude can be persuaded over time, as they see that others are engaging with the Programme and are being assisted to move on to other forms of earning a living.

As the implementation of the LRP will be supported by the PRO Programme, the number of people who can be assisted significantly exceeds the number of actual people operating at the waste dumps and will include persons who engage in waste collection in towns, from street containers or other locations where waste is deposited (street collectors). There is little concern that people will flood to operate at municipal waste dumps to be eligible for livelihood restoration under the LRP, if there will be room for anyone engaging in that type of work to be included. However, if something like this happens and the PRO Programme is not able to continue to include anyone who expresses a wish in livelihood restoration activities, the PRO Programme will define a set of criteria for who will be included in LRP implementation. The criteria will be defined based on specific circumstances at each waste dump, but it is expected that they may include things like, operation at the waste dump at least 15 days in a month for a period of three months, which would demonstrate that the individual is engaged in waste picking and that it is a source of livelihood for him/her and his/her household.

As presented earlier in the LRP, it can be predicted that the number of affected waste pickers at municipal waste dumps will be under 150 and an additional 250 people who are a part of their households (75 households with an average of 5 members).

7.2 Vulnerable Individuals / Households

Overall, the whole affected population engaging in an informal economic activity can be considered vulnerable and the measures foreseen as assistance under the LRP involve a variety of support services which can be provided depending on the affected person's or household's specific vulnerability.

Nevertheless, some individuals or households are considered even more vulnerable than others and in the context of this Project, they include:

- elderly single headed households or households comprising an elderly couple with no younger members who can provide support;
- single parent households and among them, particularly those with young children;
- households with multiple members all living together;
- illiterate persons or persons of a lower educational status.

8 LIVELIHOOD RESTORATION MEASURES AND ENTITLEMENTS

8.1 Livelihood Restoration Opportunities and Measures

Waste pickers will be entitled to livelihood restoration measures described in detail further in this section. The precise measures which will be selected and implemented will be defined for each household individually, in the form of a household livelihood support plan. The plan will be developed at the beginning of the process in cooperation with the waste picker(s) and their household members.

This section describes the types of activities which will be available under the LRP, with funding from the PRO Programme, to assist the waste pickers and their households to restore their livelihoods. It includes measures which are usually used to assist people economically,

but it also includes support measures which can support them and their households to be able to take advantage of income earning opportunities. It is important to highlight that measures have been designed based on feedback from the affected people themselves, in meetings but also as expressed through the socio-economic survey.

The PRO Programme will be strongly committed to securing equal access to all these opportunities for both women and men and to take into account any specific measures which would enable women to take greater advantage of livelihood restoration measures.

8.1.1 Assistance to Formalise Waste picking Activities

A number of people who engage in waste picking expressed a wish to continue with the same livelihood strategies and activities. From experience on other projects, there is a strong likelihood that a number of people will choose to move on to waste dumps in other municipalities or regions, when the waste dump they are currently operating on closes. However, for any who wish to formalise their activities a twofold approach can be used, one for individuals and the other for groups of waste pickers.

Each interested waste picker can be assisted to register as a sole trader under Serbian law, using the International Standard Industrial Classification (ISIC) of All Economic Activities, under the code 3811 - Collection of non hazardous waste. This form of registering economic activity is easier to manage compared to other types of businesses, in the sense that monthly taxes and social and pension contributions can be assigned by the Tax Administration and the individual's obligation is to pay these amounts every month, while anything else they earn, they can use in any way they wish, including withdrawing cash from their bank account. There are also no special requirements to be able to register, except that the person has to have a valid ID card and bank account. However, although formal education is not a precondition for becoming a sole trader, there has to be a certain level of literacy and skill to be able to operate, including managing finances, paying the mentioned monthly obligations (and possibly other, local level taxes, like the environmental tax), managing a bank account, etc. which can all be learned with appropriate training and support. Another risk is that the taxes and contributions have to be paid in the specified amount each month, regardless of how much the person earns and has available at a certain point in time (e.g. if waiting for payment of services longer than expected). There are also other specific details that must be considered for each individual, however this model is definitely possible as one of the affected waste pickers, at the Valjevo waste dump, is already registered and is being paid in this way. Another interesting ISIC code to consider for registering under is 4669 - Wholesale of waste and scrap and other products (not else classified) for persons who may be interested in engaging in collection of waste and wholesale, with some additional support, in the form of grants, as described further in the text.

The second option is to assist the waste pickers to form any kind of group organisation for waste collection, such as a cooperative or even one person to register as a sole trader with employees, which may be a good option for several household members engaging in waste picking. There are various models which can be used for this type of collective work and UNOPs already has a wealth of experience to draw from. Setting up this type of economic activity takes the most time and requires a lot of support, however it is a model which can help restore the livelihoods of a significant number of people at once.

8.1.2 Access to Employment and Training

The following employment and training opportunities will be provided to waste pickers with the aim of assisting them to restore and/or improve their livelihoods:

- access to employment during the construction phase of the Programme;
- access to employment during the operation phase of the Programme;
- access to employment/income generation programmes available in their place of residence or any other agreed location, provided through municipal / Republic level institutions or agencies (including all municipal public communal enterprises);
- access to employment / income generation programmes opportunities identified in cooperation with the National Employment Agency or in the agricultural sector, through local offices for assistance to apply for agricultural subventions;
- access to vocational training opportunities (construction, driving, hairdressing, sewing, catering, mechanical works, agricultural improvements, caregiving, etc.) depending on their skills and preferences, identified in cooperation with the National Employment Service or any other local training provider;

Identifying employment opportunities available to waste pickers during construction will require cooperation between the selected contractors (and their subcontractors) and the LRP implementation team. Contractors can also provide additional training to any interested waste pickers to be able to work on certain jobs during construction, especially some that have prior experience or even formal skills or a driver's license (which some reported during the socio economic survey). It is important to note that work during construction is not considered a permanent employment opportunity, as it will last only for a limited period of time. However, it may assist the waste picker in gaining additional skills and experience which can contribute to their employability in the future. All those who demonstrate good performance on construction jobs, will be offered opportunities during the operations phase, in the RWMC, which will be a more permanent solution.

Identification of employment opportunities which would be available during operations will require cooperation with the RWMCs especially during the development of the future job systematisation plan or similar document (corporate development plan), which will define the employment positions which are needed for the operation of the RWMC and all other activities to be implemented at the regional landfill (sorting, recycling, composting, etc.). This process can also serve to define what skills training can be organised for interested individuals to be able to apply for these positions. Depending on the scale of training and number of participants the training could be organised in cooperation with the National Employment Service.

8.1.3 Access to Small Grants

Small grants in the form of equipment (value of at least 3,000 EUR per person) for any type of income generating activities for the household, will be used as a supplementary measure to strengthen livelihood restoration efforts. The types of equipment will depend on the final choices of waste pickers for livelihood restoration and any other relevant household circumstances (e.g. an agriculture-related grant if the household has conditions to engage in small scale agriculture).

Those who decide to continue to operate in the waste sector, can be provided with equipment that will assist them to be safer at work, as well as to collect larger quantities of waste, such as trailers or trolleys, possibly portable waste compacting equipment, storage containers, or

anything else available which could be of use. If people join into cooperatives, their small grant allowances can be combined to purchase larger, fixed equipment for sorting, pressing, baling, etc.

Those who are interested in any other types of economic activities, small grants can be tied to the type of small business they decide to start up or the training they receive. For example, someone interested in starting a repairs shop can be assisted with sets of tools, those interested in learning the skill of hairdressing can get the basic hairdressing tools or equipment, starting a catering business, can include cooking and baking equipment, providing woodcutting services can be paired with the provision of an electric wood saw, etc.

Another area for support particularly in rural areas is agriculture. Many of the waste pickers have their own houses with gardens and some may be interested in small grants in the form of domestic animals (cows, pigs, egg laying hens) or equipment to improve vegetable gardens, including systems for irrigation or small greenhouses, or anything similar.

The possibilities for small grants are endless and can be defined in cooperation with the waste pickers, after consideration of their preferences, living circumstances, chances to use the equipment for an income earning activity, previous skills or attended trainings, etc. Some grants may also be provided by the National Employment Service, through measures that target individuals who opt to start a small business, and in some cases specifically persons of Roma nationality, identified as vulnerable groups in need of additional support.

8.1.4 Other Forms of Assistance

To support the process of livelihood restoration of waste pickers, particularly vulnerable individuals and their households, they and/or members of their household will be supported through other measures, which could include:

- Assistance to obtain personal documents (important to be able to access any form of government funded assistance, listed further)
- Assistance to register with the National Employment Service and access available programmes for employment, self-employment, small grants and/or training
- Assistance to apply for social welfare assistance provided through the Centre for Social Welfare
- Assistance to enroll children into school or preschool, kindergarten, daycare etc. (important especially for female waste pickers, particularly those who have no support system for childcare)
- Assistance to access and complete adult education (completion of the obligatory primary school)
- Assistance to obtain health care cards and to use the services of the municipal health care centre

The above listed services can be provided with assistance from local self-governments where the waste pickers have registered residence. In the case of those waste pickers recorded by the census and socio economic survey, these are the following local self-governments:

- Ub, Vladimirci, Valjevo, Apatin, Odžaci, Kula, Bač, Sremska Mitrovica, Ruma and Šid, all benefitting from the Serbia Solid Waste Programme
- Vrbas, Mali Idoš and Zrenjanin, who are not the beneficiaries of the Programme

The PRO Programme already has established relationships with a significant number of municipalities across Serbia and assists them (and local communities) in creating transforming local policies, structures and processes, to provide improved services to citizens. Support as part of the LRP will focus on assisting local governments to set up the work of local Roma Coordinators (as most of the waste pickers are Roma) or, where they exist, to improve their performance. The final aim will be to support the local Roma Coordinators to engage with the waste pickers and support them to access local services listed above. The PRO Programme may identify other ways in which local self-governments can be supported with the ultimate aim of ensuring waste pickers are assisted with livelihood restoration, in a sustainable way.

8.2 Individual and Household Entitlements

The table below summarises the minimal entitlements that will be available to each affected waste picker and his/her household in an effort to support livelihood restoration and foster livelihood improvements.

INDIVIDUAL AND HOUSEHOLD ENTITLEMENTS
<p>Each affected waste picker and at least one more adult member of his/her household will be provided with options for livelihood restoration, as follows:</p> <ul style="list-style-type: none"> ● Assistance to formalise waste picking activities, either as sole traders or in the form of group organisations or cooperatives <p>OR</p> <ul style="list-style-type: none"> ● Assistance to access employment, either in connection to the Serbia Solid Waste Programme or any other suitable employment <p>AND</p> <p>The waste picker’s household will also be entitled to:</p> <ul style="list-style-type: none"> ● At least one training package for any member of the household ● At least one small grant either tied to the above livelihood restoration activities or to the successfully implemented training. An exception can be made if the household is particularly vulnerable and has no options for employment, formalization of waste picking activities or to participate in training (e.g. households comprising only elderly people, single parent households, etc.). ● Other forms of assistance for household members, to support more sustainable livelihood strategies. This assistance will be particularly important for vulnerable individuals and households.

Table 10 – Individual and Household Entitlements

If the two persons involved in livelihood restoration are both affected waste pickers, they will each have an option to include one more household member, in livelihood restoration. This is designed to account for multimembered households who need stronger support to restore (and improve) their livelihoods and standards of living. However, in such a case, the household unit will still only be entitled to one household package (one training, one grant and other assistance).

Recognising that there needs to be a certain level of responsibility on the side of the waste pickers in all instances, and especially in case the selected measure includes access to employment, it is necessary to define certain rules.

Each waste picker who opts for this measure will be offered suitable employment (in line with his/her qualifications and/or experience) **at least three times** before the obligations towards an individual under this LRP are considered closed. All offers of employment must be recorded by the LRP implementation team and documented. All offers of employment must involve salaries which are at least at the level of the official minimum wage in Serbia (300 EUR net in 2023).

If an individual, who opts for employment, finds himself/herself within any of the following situations, it will count as one (of three) properly provided employment opportunities:

- fails to appear at a precisely scheduled job interview suitable to his/her qualifications and experience without any justification, or
- does not accept an officially presented employment offer suitable to his/her qualifications and experience, or
- terminates his/her employment contract, at his/her own documented request, or
- loses his/her job as a result of unsatisfactory performance documented by the employer and in accordance with Serbian labour legislation (for example: not showing up for work, being persistently late, engaging in inappropriate behaviour, etc.)

It is important to note that one of the conditions for receiving social welfare under Serbian legislation is for the beneficiary to be unemployed or receiving an income below a certain threshold. This is why affected people sometimes refuse to accept formal employment, so that they do not lose the social welfare assistance which is often seen as the only reliable source of income they can count on. This is especially the case when they are able to earn more when combining informal waste picking and social welfare than they would if they were formally employed, i.e. the offered net salary. This is something that needs to be considered when offering employment to affected people and discussed with the waste pickers, to help them actually weigh the benefits, which in some cases may actually only be psychological and not realistic. This is especially having in mind that the right to social welfare payments is being more and more scrutinised by local Centres of Social Welfare, in an attempt to prevent misallocation. The consultants received informal feedback from some of the waste pickers that they have been denied social welfare payments when the local authorities determined that they were paid for waste collection, through receipts that they were issued by some of the collecting companies.

If a waste picker opts to register as a sole trader or become a member of a waste collection group or organisation, and then changes his/her mind, or the initiative fails for any reason, he / she will be entitled to two more employment assistance offers, as described above.

9 INSTITUTIONAL ARRANGEMENTS

9.1 Overall Responsibility and Management

The overall responsibility for the implementation of the LRP, as a condition of the loan for the Serbia Solid Waste Programme, lies with the 4 RWMCs as the direct beneficiaries of the Programme and the MEP as the representing authority of the Government of Serbia. As the RWMCs and the MEP do not have the necessary resources and mandate for the implementation

of the LRP, this support will be provided by the PRO Programme. The LRP will be implemented as a sub-intervention of the PRO Programme.

The PRO Programme is already established and has its own implementation structure. The PRO Programme is managed by a Steering Committee comprising of the following representatives:

- Ministry of Environmental Protection of the RS
- Ministry for Labour, Employment, Veteran and Social Affairs of the RS
- Ministry of Public Administration and Local Self-government
- Swiss Agency for Development and Cooperation
- UN Resident Coordinator Office, and
- Participating UN agencies, which are yet to be defined (e.g. UNOPS, UNDP, UNICEF, UN Women, etc.).

To ensure that the LRP is implemented within this structure, EBRD and AFD will participate as observers and on an as needed basis in the work of the Steering Committee work. In addition, there will be channels of regular coordination and communication during the process of LRP implementation between the PRO Programme and the IFI's. The commitments of all sides in the process have been formalised through a Memorandum of Understanding signed between the IFIs and SDC, as the donor of funds for the implementation of the LRP.

9.2 LRP Implementation Team

The PRO Programme will form a team for the implementation of the LRP (LRP Implementation Team) whose main responsibility will be to ensure that the purpose of the LRP is achieved and that the requirements of IFI policies have been met. The structure and organisation of the LRP Implementation Team will be determined by the PRO Programme.

The LRP Implementation Team will have overall responsibility to develop an LRP implementation strategy, based on this document and the specific mandate of each UN organisation participating in this process, and to have initial contacts with involved stakeholders, particularly RWMCs and local self-governments, to ensure their participation and support in the process. The LRP Implementation Team will also be in charge of internal LRP monitoring and reporting.

The LRP Implementation Team will be in charge of direct cooperation with the waste pickers and livelihood restoration planning and implementation, at individual and household level. The LRP Implementation Team will also be in charge of coordination with the RWMCs, the PUCs and the contractors, as well as cooperation with the local self governments and local service providers.

Members of the LRP Implementation Team will visit each involved waste dump and will hold preliminary meetings with the waste pickers to present available livelihood restoration measures, foreseen timelines for the closure of waste dumps and record individuals and households interested in participation in the LRP. At this time, the LRP Implementation Team members will inform the wastepickers about the LRP grievance mechanism and explain to them whom they can contact and how, and what they can expect in terms of the process for addressing their grievance. Apart from the option of submitting the grievance to the LRP Implementation Team, affected people will also be able to contact a representative of the RWMC, who will be tasked with processing their requests and grievances, not directly submitted to the LRP Implementation Team.

As mentioned in the introductory sections of the LRP, four more municipalities joined RWMC Kalenić – Mali Zvornik, Loznica, Krupanj and Ljubovija, in October 2023, when the assessment and planning activities for the LRP were already completed. A rapid assessment of the presence of wastepickers at municipal wastedumps in these municipalities was carried out and the results are included in Annex 5 of the LRP. The only wastedump where some wastepicking activity is being carried out is Loznica, and therefore this municipality will be included in LRP implementation. The inclusion of any additional municipalities in the Serbia Solid Waste Programme is not expected, however, if such circumstances should arise, any new details will be added in an annex to the LRP, as was done for the four mentioned municipalities.

The LRP Implementation Team will continue direct contacts with interested waste pickers and households, to collect detailed personal information about the waste pickers and their households, including visits to their homes, to better understand their living environments and to develop individual household livelihood support plans. Based on the household livelihood support plans, the LRP Implementation Team will develop a detailed plan of action and timeline.

In the next stage, the LRP Implementation Team will focus on implementing household livelihood support plans, engaging with various important stakeholders. As mentioned earlier, they will need to be in direct contact with contractors to identify any work opportunities for any of the waste pickers as well as with persons who will be developing job systematization plans for the RWMCs. The LRP Implementation team will organise the procurement of trainings and grants according to the needs of affected households. During this stage, activities to assist waste pickers to register as sole traders or create some form of a collectors' organisation will also be implemented. As various UN Agencies will be involved in implementation, the different activities may be divided between them, based on their specific mandates and/or target groups. For example, UN Women may work specifically with female wastepickers, while UNICEF may be involved in supporting children through various activities, etc.

Direct contacts with waste pickers will continue throughout this stage, to provide advice and to follow up on the fulfilment of mutually agreed steps. The Implementation Team will continually add any newly interested waste pickers at the wastedumps into the programme of support, until the cutoff date. i.e. the closure of an individual waste dump.

As mentioned before, some further assistance will be provided to the households by local self-governments, i.e. Roma Coordinators, or other relevant representatives. The Implementation Team will be in constant contact with these individuals and will follow up on any agreed services that the local self-governments committed to provide to waste pickers and their household members.

As mentioned earlier the PRO Programme will seek to include more beneficiaries than those directly affected by the Serbia Solid Waste Programme, i.e. street waste pickers. The PRO Programme will also implement activities in areas covered by the two remaining RWMCs (Duboko and Pirot), Although there are no impacts stemming from the Serbia Solid Waste Programme in these locations, there is room to work with people engaging in waste collection, including those currently working through the organisation Amala from Pirot.

9.3 RWMCs and MEP

The RWMCs will have direct responsibility to support the LRP Implementation Team in communicating with the contractors to identify potential employment opportunities during construction and to provide direct support in providing employment options for the waste pickers in the RWMC once they become operational. Performance of any employed waste pickers will be monitored by the RWMCs and feedback will be provided to the LRP Implementation Team. All this has already been done by the Pirot RWMC, who can share their experience directly with the other RWMCs, if needed.

The MEP has an obligation to regularly follow the LRP implementation process, review implementation and monitoring reports which will be submitted to the EBRD and AFD and support the LRP Implementation Team of the PRO Programme to address specific issues where support from other government ministries or agencies may be needed.

10 CONSULTATION ACTIVITIES AND GRIEVANCE MANAGEMENT

10.1 Stakeholder Engagement During the Preparation of the LRP

Throughout the preparation of the LRP document, this assignment has been presented and consulted on a number of occasions with various stakeholders, including the PIU in the MEP, representatives of RWMCs, municipal PUC managers and staff, as well as the waste pickers. Further to that, a socio economic survey was implemented at waste dumps where waste pickers are operational. All these activities have been described in previous sections of the LRP.

In addition to what has been described already, during the course of LRP development, the consultants also met with representatives of Bankwatch CEE and their partners, who have experience with waste management and provision of assistance to waste pickers. They exchanged views on some of the measures which can be implemented to improve livelihood restoration programmes compared to previously implemented resettlement and livelihood restoration plans. The feedback received from Bankwatch at the first meeting in December 2022, which has been taken into account in the development of the LRP includes the following:

- seasonal waste picking needs to be registered by the census and addressed, to ensure compliance with the EBRD policy
- support needs to be provided not only to the affected waste pickers but their household members, particularly women
- a possible solution for wastepickers who may not want to engage in formal employment, could be the provision of small grants (equipment for livelihood activities)
- it is necessary to try to establish baseline incomes of the waste pickers, so that the success of the restoration of these incomes can be determined
- it is necessary to include in the LRP the entitlement to social welfare for individuals who fulfil the legal criteria, until their livelihoods are completely restored
- it is necessary to consider and address any livelihood impacts on middle men and recycling companies

10.2 Planned Stakeholder Engagement Activities

The LRP will be publicly disclosed on the website of the MEP and the RMWCs (where available), as well as on the websites of the EBRD and AFD.

The MEP will inform by email the PUCs on whose waste dumps there are operational waste pickers, as well as local self-governments in which they are residing, about the availability of the LRP.

Consultations with individuals and their household members will be an ongoing activity all throughout implementation.

10.3 Grievance Management Procedure

Setting up a grievance mechanism is premature at the time of finalising this LRP, however once LRP implementation begins, this will be one of the first obligations to implement. Therefore, this LRP sets out the principles for grievance management which will be used, but the actual contact details of responsible individuals, will not be available until a later date.

In general, grievances will need to be addressed by those who are directly implementing the LRP. This means that members of the LRP Implementation Team will be points of contact for the waste pickers and members of their households to lodge a complaint regarding the LRP. Depending on the final programme developed by each UN agency and their field of work (children, women, elderly, etc.) LRP focal points may be different and their contacts will be available to waste pickers and their household members involved in the programme.

To ensure that waste pickers also have the option of submitting a grievance to someone directly responsible for the Serbia Solid Waste Programme, they will be provided with contact details of one representative of each RWMC, as well. With assistance of the RWMC, the PUCs will also be made aware of the grievance system and in case any of the waste pickers turn to them for assistance, they will be able to contact the LRP Implementation Team and/or the RWMC responsible person to convey the waste pickers concerns. A grievance box will also be made available at the waste dump guard stations where anyone will be able to lodge an anonymous complaint. As agreed with PUC Directors, the guards will have an obligation to collect anonymous grievances and deliver them to the LRP Implementation Team and/or the RWMC responsible person. A response to anonymous grievances will be delivered by the LRP Implementation Team or the RWMC responsible person at joint meetings with waste pickers or in any other appropriate manner. All other stakeholders, such as the local self-governments and representatives of their departments, service providers, contractors, etc. will also be made aware of the LRP Grievance Mechanism as they join in the implementation.

Grievances will be managed by the LRP Implementation Team, who will ensure that all grievances are recorded and responded to within a period of 20 days, or in case of complex grievances, that the affected waste pickers are kept informed about progress in addressing the grievance until it is solved. In case of complex or repeated grievances, the RWMC responsible person will call a meeting comprising of a representative of the relevant member of the LRP Implementation Team, the RWMC, PUC and any other relevant stakeholders, such as contractors or local self-government representatives, as well as the affected person who submitted the grievance, if appropriate. The grievance will be discussed by all parties with the aim of resolving it in accordance with the LRP and IFI requirements.

11 MONITORING AND REPORTING

11.1 Monitoring

The LRP Implementation Team will monitor the implementation of the LRP (internal monitoring) to ensure that activities are producing desired outcomes and to determine if changes in the approach or implementation are necessary.

In addition, the EBRD and/or AFD will engage independent external monitoring, to review progress and carry out a compliance review at least once during implementation. As mentioned earlier in the document, there is a small possibility that some additional land may need to be acquired for the expansion of regional landfills or for the construction of transfer stations. If such circumstances arise, the lenders may engage an external consultant to review the newly needed locations, as they become known, to confirm there are no land acquisition related impacts or to develop measures for addressing potential impacts in accordance with IFI requirements. The outcome of these activities and needed mitigation measures, will be included as an annex to the LRP:

A completion audit will also be carried out following completion of livelihood restoration for all affected people, i.e. those finally registered as affected after the cutoff date at all involved municipal waste dumps.

An indicative list of indicators, which will be used for monitoring, is provided in Table 11 below. Additional indicators may be identified and later added by the LRP Implementation Team, as implementation progresses. All data will be collected and presented disaggregated by gender, as well as by RWMC and municipality.

Topic	Indicative indicators	Monitoring frequency (3 years)
LRP implementation process	Number of joint meetings (to present the LRP and during implementation) and meeting minutes (number of participants)	Biannually
	Number of individual household meetings and number of individual household assistance plans, number of newly recorded waste pickers, until the cutoff date	Monthly
	Number and types of grievances submitted and the rate of successful resolving of grievances The average length of time to address grievances as well as the number of grievances that exceed the timeframe for resolution Number of unresolved / outstanding grievances and plan to resolve and close them	Monthly
	The timing of implemented activities in comparison to the LRP implementation schedule	Quarterly
	The amount of funds spent for the implementation of the LRP and the rate of spending	Quarterly
	Changes in income levels	Number of individuals with increased / maintained / reduced income (the baseline income will be discussed with the waste pickers and registered in the household livelihood support plan and periodically updated)

Topic	Indicative indicators	Monitoring frequency (3 years)
	Number of households with increased/reduced total household income (same as above, adding all individual household members' incomes together)	Quarterly
	Number of households whose standard of living has deteriorated / maintained / improved, as judged by the household members themselves and as recorded by the LRP implementation team	Quarterly
Livelihood restoration – continuation of formalised waste picking	<p>Number of waste pickers assisted to register as sole traders</p> <p>Number of waste pickers continuing to operate as sole traders and length of operation</p> <p>Number of waste pickers who terminated their sole traders status and reasons why</p> <p>Number of formed or established waste picker organisations or groups and number of members in them</p> <p>Number of groups or organisations who continue to operate in that way and length of operation</p> <p>Number of groups or organisations which terminated operations and reasons why</p>	Quarterly
Livelihood restoration – employment opportunities	<p>Number and type of employment opportunities offered to each waste picker</p> <p>Number and type of employment opportunities accepted by each waste picker and employment successfully initiated (contract signed)</p> <p>Number and type of job held by each waste picker and length of employment</p> <p>Number and type of job lost by each waste picker and reasons</p>	Monthly
Livelihood restoration - trainings and grants	<p>Types of training carried out for each waste picker and description (how long, skills or diplomas gained, etc.)</p> <p>Types of small grants provided to each household and their value</p> <p>Use of small grants by households and description of impact on household incomes and standard of living</p>	Monthly
Other forms of assistance	<p>Number and type of personal documents provided for waste pickers</p> <p>Number of affected people who received social welfare and type of assistance provided</p> <p>Number of children / young adults assisted to access kindergardens /schools</p>	Quarterly
Vulnerable groups	Number of particularly vulnerable households (single parent households, elderly or disabled waste pickers or household members) assisted and types of assistance	Monthly

Table 11 - Indicative List of Indicators for Monitoring

11.2 Reporting

When the implementation of the LRP begins, the LRP Implementation Team will submit regular quarterly progress reports to the MEP and IFIs. All meetings and consultations will be documented with minutes and photographs, while all other activities will be documented through regular updating of individual household assistance plans, a summary of which will be provided together with progress reports. A final report will be developed and submitted to EBRD when all livelihood restoration and assistance measures have been implemented and all impacts successfully mitigated.

External consultants hired by EBRD and/or AFD will produce compliance reports and the final completion audit report.

12 IMPLEMENTATION PERIOD AND BUDGET

12.1 Implementation Period

The implementation of the LRP will begin in January 2024 and will last for three years (36 months) until January 2027, with possibility of extension. The majority of waste dumps are expected to be closed in the first half of 2026 and this is when the inclusion of new waste pickers in LRP implementation will end (cutoff date).

Most of the livelihood restoration efforts will already be implemented by that time, however for any of these, last cases, the measures should be completed by the end of 2026, with a possible need to extend LRP implementation for a limited number of cases, for an additional six months.

12.2 Budget

LRP implementation will be financed through the PRO Programme and the total available budget is 2 million EUR.

It should be noted that some services available under Serbian legislation, for example social welfare payments, services provided under the National Employment Agency or any similar activities will be provided from budgetary sources of these institutions and outside of LRP costs.

13 ANNEXES

Annex 1 – site visit photographs

Annex 2 – census registry (not for public disclosure), provided as a separate file

Annex 3 – socio economic survey data base (not for public disclosure), provided as a separate file

Annex 4 – socio economic survey questionnaire

Annex 5 – rapid assessment of the presence of wastepickers in 4 municipalities which joined RWMC Kalenić in October 2023

Annex 1 – Site Visit Photographs

Sjenica waste dump



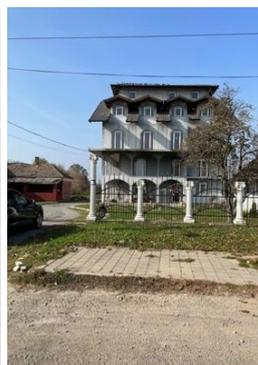
Priboj waste dump



Transfer station Nova Varoš (not yet operational); future regional landfill in Nova Varoš



Ub waste dump and one house in settlement next to the waste dump



Obrenovac waste dump



Vladimirci waste dump



Valjevo waste dump



Sombor waste dump



Apatin waste dump and one house in settlement next to the waste dump



Kula waste dump



Crvenka waste dump (Kula municipality)



Sivac waste dump (Kula municipality)



Sremska Mitrovica waste dump



Annex 4 – Socio Economic Survey Questionnaire

SERBIA SOLID WASTE PROGRAMME – SURVEY OF WASTEPICKERS

1. GENERAL DATA	
1.1 Date of the survey	
1.2 Number of the survey form	
1.3 Name and surname of the surveyor	
1.4 Name and location (municipality) of the wastedump	

2. DATA ON THE INTERVIEWED WASTEPICKER	
2.1 Name and surname of the wastepicker	
2.2 Contact phone number of the wastepicker	

INFORMED CONSENT OF THE INTERVIEWED WASTEPICKER
<p>I hereby confirm that I have been informed that the data collected through this socio economic survey will be treated as confidential and that I can withdraw my consent and stop my participation in the survey at any moment, as well as to refuse to answer any one or all questions from the survey.</p> <p>With this confirmation, I am giving the consultants who are implementing the survey the right to use the data collected through the survey only with the purpose of developing and implementing the Livelihood Restoration Plan for the Serbia Solid Waste Programme in accordance with the Personal Data Protection Law of the Republic of Serbia.</p>
Date:
Name and surname:
Signature:

Definition of household: persons living under the same roof and sharing meals (husband/wife, partner, parents, siblings, children, and others)

3. RESIDENCE AND ASSETS OF THE WASTEPICKER'S HOUSEHOLD	
3.1 Address where the household currently resides:	<p>3.2 Does the wastepicker or any member of his/her household own the apartment / house in which the household currently resides or has another basis for its use:</p> <p><input type="checkbox"/> Owns (property ownership)</p> <p><input type="checkbox"/> Rents from another owner</p> <p><input type="checkbox"/> Uses under a different arrangement (for example, social apartment, worker accommodation and similar). Please explain the basis for use:</p>
3.3 Address of official registered residence (from ID card):	

4. GENERAL DATA ON THE WASTEPICKER AND ALL MEMBERS OF THE HOUSEHOLD						
No.	Name and surname	Relationship to interviewed wastepicker (wife, partner, parent, child, sibling, etc.)	Year of birth	Sex M / F	Disability / chronic illness, specify type	Possession of ID card or other personal document (birth certificate for children) (Yes / No)
1		Wastepicker				
2						
3						
4						
5						
6						
7						

4. GENERAL DATA ON THE WASTEPICKER AND ALL MEMBERS OF THE HOUSEHOLD						
No.	Name and surname	Relationship to interviewed wastepicker (wife, partner, parent, child, sibling, etc.)	Year of birth	Sex M / F	Disability / chronic illness, specify type	Possession of ID card or other personal document (birth certificate for children) (Yes / No)
8						
9						
10						
11						
12						
13						
14						
15						

5. EDUCATIONAL STATUS OF WASTEPICKERS AND HOUSEHOLD MEMBERS OVER THE AGE OF 6				
No.	Name and surname	Last completed grade and type of school (e.g. third grade primary school, second grade of medical secondary school and similar)	Still attending school? (Yes / No)	Additional skills (including informal, i.e. without a diploma), for example, construction, fruit picking, driver, cleaning and similar.
1				
2				
3				
4				
5				
6				
7				
8				

5. EDUCATIONAL STATUS OF WASTEPICKERS AND HOUSEHOLD MEMBERS OVER THE AGE OF 6				
No.	Name and surname	Last completed grade and type of school (e.g. third grade primary school, second grade of medical secondary school and similar)	Still attending school? (Yes / No)	Additional skills (including informal, i.e. without a diploma), for example, construction, fruit picking, driver, cleaning and similar.
9				
10				
11				
12				
13				
14				
15				

6. INCOMES AND EMPLOYMENT OF THE WASTEPICKER AND ALL MEMBERS OF THE HOUSEHOLD						
No.	Name and surname	Primary source of income (e.g. wastepicking, employment, pension, social welfare and similar)	Estimated monthly net income from primary source (in RSD)	Additional source of income (e.g. agricultural works, construction, remittances)	Estimated monthly net income from additional source (in RSD)	Registered with the National Employment Service (Yes / No)
1						
2						
3						
4						
5						
6						
7						
8						

6. INCOMES AND EMPLOYMENT OF THE WASTEPICKER AND ALL MEMBERS OF THE HOUSEHOLD						
No.	Name and surname	Primary source of income (e.g. wastepicking, employment, pension, social welfare and similar)	Estimated monthly net income from primary source (in RSD)	Additional source of income (e.g. agricultural works, construction, remittances)	Estimated monthly net income from additional source (in RSD)	Registered with the National Employment Service (Yes / No)
9						
10						
11						
12						
13						
14						
15						

7. WASTEPICKING OF THE WHOLE HOUSEHOLD	
7.1 What type of waste does your household collect and how much do you collect on average per day (all household members together)?	<input type="checkbox"/> Paper, cardboard (average collected quantity per day) : <input type="checkbox"/> Plastic (average collected quantity per day) : <input type="checkbox"/> Metal (average collected quantity per day) : <input type="checkbox"/> Glass (average collected quantity per day) : <input type="checkbox"/> Other (specify what and average collected quantity per day) :
7.2 Who do you sell the collected waste to, for example, the PUC, a private company, individual?	
7.3 How long has the household been engaging in wastepicking?	

8. NEEDED ASSISTANCE FOR ALL HOUSEHOLD MEMBERS

8.1 If you lost the possibility to collect waste in this location, what type of assistance would you like to receive for your household members, to find other sources of income?

Describe the answer as precisely as possible (for example, employment in the PUC for this member of the household, hairdresser training for this household member, social welfare, assistance to start up own business, personal documents for this member of the household, etc.):

Annex 5 - Rapid assessment of the presence of wastepickers in 4 municipalities which joined RWMC Eko Tamnava in October 2023

In October 2023, four municipalities – Loznica, Mali Zvornik, Ljubovija and Krupanj, formally joined RWMC Eko Tamnava. Although assessment activities for the LRP were already completed and the document was close to being finalised, it was necessary to determine whether the closure of municipal wastedumps in these municipalities, after the RWMC becomes operational, could lead to impacts on wastepickers operating on any of the wastedumps.

At the end of October 2023, the Ministry of Environmental Protection of the RS provided information to the lenders about municipal wastedumps in these locations. According to that information, in Ljubovija, the municipal wastedump stopped operations in 2010, while in Mali Zvornik, the municipal wastedump has been closed since 1999. Both municipalities have been disposing their waste in Loznica municipality since then.

In the municipality Krupanj, there is an active, municipal wastedump. On initiative of the LRP consultants, representatives of RWMC Eko Tamnava contacted the public utility company '1. Maj' from Krupanj, to enquire about the presence of wastepickers at this wastedump. The PUC sent a letter to Eko Tamnava in early November 2023, informing the company that there are no wastepickers operating on this wastedump.

Representatives of Eko Tamnava also contacted PUC 'Naš dom' from Loznica and enquired about the number of wastepickers operating on the wastedump. The initial feedback obtained from the Director of the PUC was that there are some individuals who engage in these activities at the wastedump, however none of them are regularly present at the wastedump and very often the individuals change. More precise information was received from the PUC Executive Director on November 20th 2023, when the LRP consultants spoke to her by phone. The Executive Director stated that after being contacted by Eko Tamnava, she personally went to the wastedump to speak to the wastepickers and to prepare a list which could be shared with the consultants. Unfortunately, all of the wastepickers declined to participate in this activity and stated that they have no interest in participating in such a programme. The Executive Director stated that she instructed the wastedump guard to continue to engage with the wastepickers several more times, to explain the benefits of participating in the programme, however, no progress was achieved. The wastedump guard who is regularly present at the wastedump stated that as of November 2023, there are six individuals who come to the wastedump several times a week and can be considered as more regular wastepickers. A few more people carry out these activities occasionally, however these are never the same individuals. Despite all efforts to record the names (or at least some preliminary information) of the more regular individuals who engage in wastepicking, this was not achieved by the PUC.

In light of this situation, and in line with LRP implementation plans, Loznica will be added to the list of municipalities in which the LRP Implementation Team will engage with the local self government to include wastepickers in various assistance programmes. In the initial stages of implementation, when field assessments are done, the LRP Implementation Team, in cooperation with the local self government, will try to engage with wastepickers at the Loznica wastedump, to offer them support, as foreseen by the LRP. If they choose to participate in the programme, they will be entitled to assistance as defined by the LRP.