

Beogradski metro i voz – BMV

Belgrade Metro Project

Resettlement Action Plan for Phase 1 of Line 1

Reference: 4-05

Issue | 30 September 2024



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Abbreviations list

Abbreviations	
BMV	Beogradski Metro i Voz (Belgrade Metro and Train)
CM	City Municipality
ESMS	Environmental and Social Management System
EU	European Union
IFC	International Financial Corporation
NA	Not available
PAP	Project Affected Person
PS	Performance Standard
RAP	Resettlement Action Plan
RS	Republic of Serbia
SEP	Stakeholder Engagement Plan
TBM	Tunnel Boring Machine

1. Executive Summary

The City of Belgrade is advancing its metro system to connect residential areas with key locations such as workplaces and educational centres, ensuring efficient and rapid transit throughout the city. The Public Utility Company "Beogradski metro i voz" (BMV) is leading the development of the Belgrade Metro Project. Currently, the planning and design of Line 1, which spans from the north of the city to the southeast of the Sava River and south of the Danube River through the historic city centre, is underway. This line will be constructed in two phases, with Phase 1 featuring 15 stations from the Makis Depot to the Pancevo Bridge.

Phase 1 of Line 1 encompasses a 15.4-kilometer underground metro network that includes 15 stations and 10 operational shafts. The construction will result in significant physical resettlement of households and potential economic displacement of numerous businesses, impacting local livelihoods. The project includes:

- At-grade section: 2.1 km from depot area to Makiš station.
- Cut-and-Cover section: 2.1 km from Makiš station to Bele Vode.
- Deep Underground section: 11.2 km from Bele Vode to Pančevački Most.

The project is designed to align with national legislation and the 2012 IFC Performance Standards, which are benchmarks for environmental and social sustainability. These standards guide humane and responsible land acquisition, resettlement, stakeholder engagement, and impact assessment practices.

This Resettlement Action Plan (RAP) has been developed in order to allow BMV to comply with the defined standards. The purpose of the RAP is to identify the gaps between the national legislation and the international standards and define the method to bridge those gaps and ensure compliance.

The methodology applied during the preparation of this document is a combination of desktop analysis of available secondary data and the analysis of primary data collected during site visits to relevant locations within the City of Belgrade. Primary data collection including surveys conducted in the affected areas highlights the specific project's impacts:

- **Residential Impact:** Several residential properties will be affected, with a notable presence of informal ownership, resulting in physical relocation.
- **Commercial Impact:** Businesses in the affected areas, especially around the stations Trg Republike, Skadarlija and Pančevački most, face relocation challenges. Impacts include temporary and permanent relocation of the affected businesses, and access restrictions during construction.
- **Vulnerable Groups:** Identification of vulnerable groups, including elderly households, households with care-dependent members, single-parent households, and ethnic minorities (notably Roma families). Specific assistance measures have been planned for these groups.

Below is a short summary provided, about each of the Chapters in the document:

Chapter 2 includes an overview of the Belgrade Metro project, including details about its design, construction, and operational phases, and includes the methodology used for the development of this document. Chapter 3 outlines the legal framework and describes the adopted standards for the development of the RAP.

Overview of project impacts and summary of affected assets is presented in Chapter 4, while Chapter 5 provides a socio-economic profile of the affected persons and businesses, specifically the identified vulnerable groups and individuals.

Chapter 6 – Eligibility Framework and Entitlement Matrix defines the categories of impact for the affected PAPs and defines the compensation and assistance measures to mitigate the impact for each identified group

Chapter 7 includes an overview of the stakeholder engagement process undertaken to date and outlines the framework for future stakeholder engagement in the expropriation process and grievance redress.

Chapter 8 defines the current Implementation Schedule for the activities related to RAP development and implementation, while Chapter 9 outlines the monitoring and evaluation requirements throughout the RAP implementation stage.

2. Introduction

2.1 Project Background

The City of Belgrade is working on the development of a metro system, whose primary purpose will be to connect residential areas with workplaces, education centres, and to secure quick and efficient transit to the most important locations within the city.

The Public Utility Company “Beogradski metro i voz” (BMV, Belgrade metro and train) is coordinating the implementation of the Belgrade metro Project. Line 1 of the Belgrade metro is currently being planned and designed, connecting the north of the city to the south, east of the Sava River and south of the Danube River, through the historical city centre.

Line 1 will be developed in two phases. Phase 1 includes 15 stations along the line from the Makis Depot to the Pančevo bridge as well as the accompanying structures (henceforth “The Project”). The Project is going through the city’s urban core and will result in physical resettlement of households as well as displacement of numerous businesses and economic activities, thereby impacting livelihoods.

The project is to be developed in accordance with the highest standards of environmental and social sustainability. For this to be achieved, strict adherence to the 2012 IFC Performance Standards is to be maintained. These standards are widely accepted as a reference point for a humane and responsible approach to land acquisition and physical and economic resettlement, effective stakeholder engagement and thorough assessment of the projects’ social impacts. It is through aligning with these standards that the Belgrade metro Project aims to deliver positive outcomes for the environment, the local communities, and other engaged stakeholders.

In February 2024 BMV appointed Arup to develop the RAP for the Project to address the displacement and livelihood impacts in line with defined standards.

2.2 Project Description

The Republic of Serbia, in collaboration with the city of Belgrade, is planning on developing a metro system in Belgrade. Phase 1 of Line 1 of the Belgrade Metro project entails the construction and operation of an underground metro network spanning 15.4 kilometres, comprising 15 stations and 10 shafts for various operational purposes. This phase of the project will involve the physical displacement of property owners and the potential economic displacement of businesses. Although initially Phase 1 included 14 stations and ended with the Station Dunav, the recent rephasing extended Phase 1 to include the station Pančevački Most and the associated location for the placement of the TBM – Tunnel Boring Machine¹.

Line 1 Phase 1 of the metro is composed of three types of sections with different construction methods:

- At-grade section (tracks are located on the surface) – this 2.1 km long section is designed for the entire depot area from the end of the line to Makiš station.
- Cut-and-cover section (shallow tunnel which requires excavation from the surface) – a 2.1km length section from Makiš station to Bele Vode station.
- Deep underground section (deep tunnel excavated below the surface by TBM) – the remaining 11.2 km of phase 1 from station Bele Vode to station Pančevački Most.

Similarly the stations will be designed based on the depth of the rail section, and will be either:

- At grade

¹ A Tunnel Boring Machine (TBM) is a specialized machine used in tunnel construction. It’s designed to excavate tunnels in various types of ground conditions, ranging from soft soil to rock. TBMs are typically cylindrical in shape and equipped with cutting tools on the front end to bore through the ground. They can range greatly in size, from small units used for utility tunnels to massive machines used for major infrastructure projects such as subway systems or large-scale water tunnels. TBMs help speed up the construction process by minimizing the need for conventional drilling and blasting methods, while also providing structural support to the tunnel walls as they progress.

- Shallow underground with or without mezzanine
- Deep underground with two mezzanines.

The first phase of the project is sized according to the expected number of passengers per hour per direction at morning peak hour, multiplied by a safety coefficient of 1.25. This is calculated as a maximum load of 10,975 passengers, based on 2027 socio-economic forecasts.

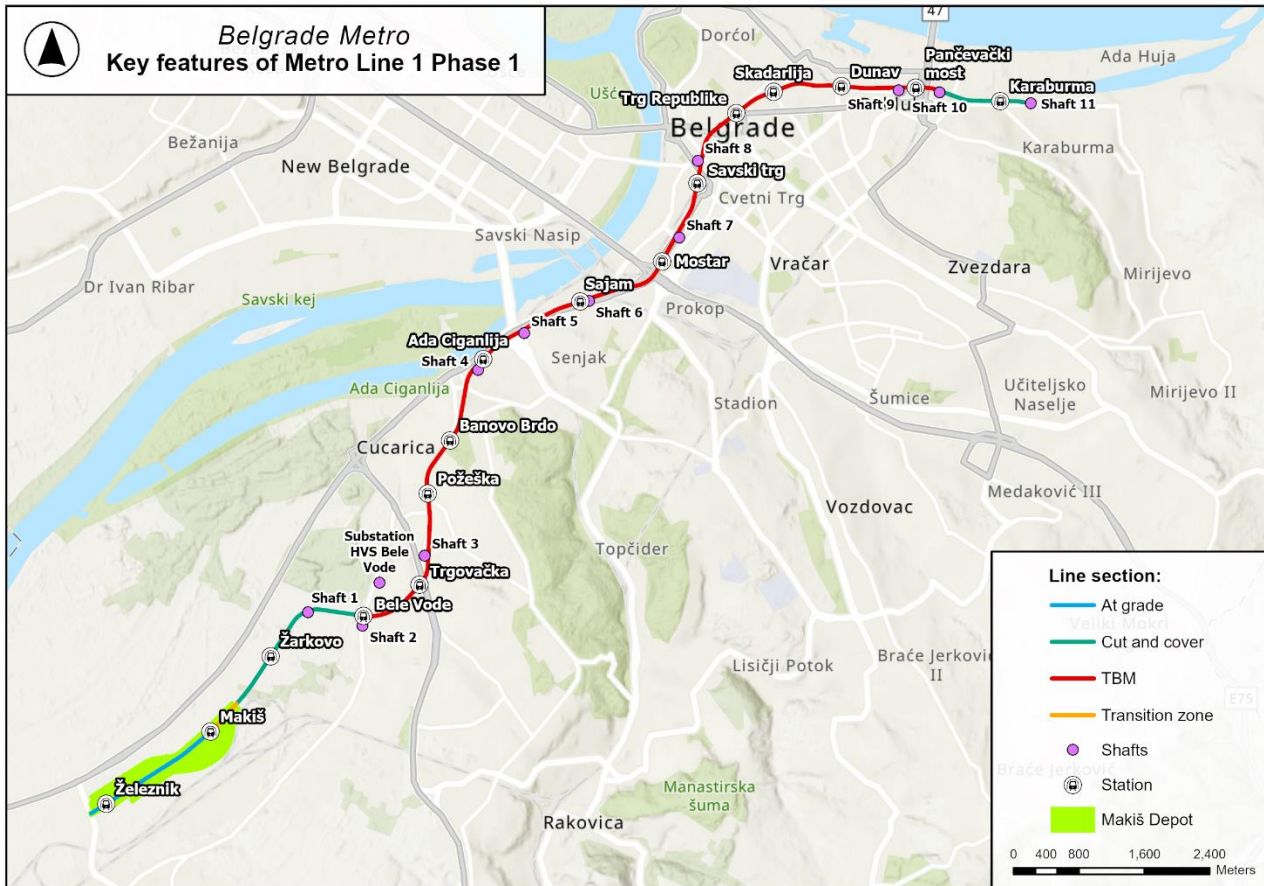


Figure 1 Map of Project Area(s)

2.3 The objectives

Due to significant environmental and social impact from the Project, it has been classified as a category A project, which requires a detailed Resettlement Action Plan (RAP) to be developed. This RAP, and its detailed provisions, are prepared to comply with the national legislation of the Republic of Serbia and IFC Performance Standards (PS) on Environmental and Social Sustainability 2012 in particular with PS5 “Land Acquisition and Involuntary Resettlement”.

The main objective of this RAP is to identify all people affected by the project and all adverse impacts on their livelihoods associated with the Project’s land acquisition, in order to allow provision of adequate compensations and assistance to eligible project affected persons (PAPs) and set out actions on how to avoid and mitigate future impacts on land and provide prompt and effective compensation for any residual impacts to those eligible.

This RAP specifies the following:

- Provides baseline census of affected persons and asset information.
- Describes specific compensation rates and standards.
- Describes institutional responsibility for implementation and procedures for grievance redress.

- Describes procedures to be followed in respect to consultation and disclosure.
- Provides implementation and monitoring arrangements.

2.4 Methodology

The methodology applied during the preparation of this document is a combination of desktop analysis of available secondary data and the analysis of primary data collected during site visits to relevant locations within the City of Belgrade.

Site visits were carried out on in the period between 20 May -7 June 2024 for the purpose of observing the current situation, verifying the findings of the initial inventory of assets, conducting a Social Impact Assessment and consulting with key stakeholders.

The Arup team has conducted a comprehensive desktop review of relevant property analyses provided by the Belgrade Land Development Public Agency (Beoland). The Arup team verified the actual condition of the affected structures during site visits, particularly focusing on their usage and occupancy status.

Surveys were executed in line with the designated metro station locations, progressing systematically from one station to the next. To adequately assess the anticipated impact of the Project, distinct approaches were adopted for private-owned and state-owned properties, also differentiating between residential and commercial structures.

To accommodate the presence of both residential and business structures, two separate questionnaires were developed. One questionnaire was specifically designed to address concerns related to physical displacement, while the other is tailored to the unique circumstances faced by commercial enterprises. The questionnaires are included in Appendix A.

2.5 Scope of the RAP

The Line 1 Phase 1 as explained in chapter 2.2 includes several locations that overlap with other segments of the development of the Belgrade Metro, as well as other development projects being implemented by the City of Belgrade.

These elements will be presented in the document as part of the Project area but are considered outside the scope of the RAP. They include the following locations:

Elements of Line 1 Phase 1 excluded from the RAP	Justification
At grade section of the line including: Station 1 – Železnik, Station 2 – Makiš, Station 3 – Žarkovo Station 4 – Bele Vode Shaft 1 Substation HVS Bele Vode	<p>The acquisition of land for these elements was conducted through the land acquisition process for the Makis depo which included the entire area of the Makis polje located on City Municipality Čukarica. This area includes expropriation of land for the line and the three stations in addition to other associated infrastructure (access roads and collectors) as well as the depo itself.</p> <p>Expropriation of land in this area has been completed.</p>
Station 9 - Sajam	<p>The Belgrade Fair is being relocated to a new location. The structure expected to be affected by the Project is planned to be demolished, as part of a wider project – Belgrade waterfront.</p>

Elements of Line 1 Phase 1 excluded from the RAP	Justification
	<p>Detailed Regulation Plan for the Belgrade waterfront is currently in the process of being adopted and includes the station at the designated location.</p> <p>The affected land parcels and the structure are publicly owned.</p>
Station 11 - Savski Trg	<p>The Main bus station is being relocated to a new location. The structure currently in the location of the metro station was planned for demolition as part of the demolition of the bus station following its relocation</p> <p>The affected land parcels and the structure are publicly owned.</p>
Station 13 - Skadarlija - Bajloni Green Market	<p>The “Bajloni” green market is planned for reconstruction by the City of Belgrade. During the reconstruction the green market will be temporarily relocated to an alternative location nearby. The metro station is included in the planned design for the reconstruction of the green market. BMV is coordinating the activities with the public utility company “Beogradske pijace” to ensure that the construction of the station coincides with the reconstruction of the green market.</p>

2.5.1 Substations

There are 3 substations planned for the entire Line 1, both phases. Currently none of the three planned substations are within the scope of the RAP:

Substation HVS Bele vode is located within the Makis polje and within the area of Phase 1 of Line 1. As indicated in the table above it is considered outside of the scope of this RAP as it is part of the wider Makis depo area, and expropriation of land required for this substation is already completed

Substation HVS Sajam is also within the area of Phase 1 of Line 1, but is currently outside the scope of the RAP because the location of the substation Sajam has not been confirmed to date. The location proposed in the current design is located on publicly owned land. However as this locations falls within the zone of the wider Belgrade waterfront development, which is currently in the planning stage, the spatial plan for this location has yet to be adopted. Until the process is completed the location cannot be confirmed. BMV submitted the formal request that the substation is included in the plan and requested guarantees for securing the location. Once the location is confirmed BMV commits to develop an annex to this RAP to include the land required for this substation.

Substation HVS Mirijevo is located at the end of Line 1, at the Mirijevo depo area. It is considered outside the scope of this RAP mainly because of the location, which falls within the area of Phase 2 of Line 1, and as such this location will be included in a separate RAP. Additionally, the system for the metro line is designed to be operational with two functioning substations, and substation Mirijevo is not functionally necessary for the operation of Phase 1 of Line 1. The infrastructure required for the substation Mirijevo to operate will be built as part of Phase 2. The development of the RAP for Phase 2 of Line 1 is planned to start before the end of 2024.

3. Legal Framework

The Project will be implemented in accordance with the national legislation of the Republic of Serbia. Due to the Project financing, the IFC Performance Standards will also be applied.

Below is the summary of applicable national legislation and the IFC requirements. The gaps between these standards have also been identified and addressed are presented in this chapter, while the actions to bridge these gaps are included in the actions of this RAP. However it is noted that in case of any discrepancies during implementation, the provisions that allow higher benefits to the PAPs would be applied.

3.1 National legislation applicable to the Project

Serbia has been actively pursuing European Union (EU) membership since 2012. This commitment extends to the legislation related to environmental and social protection. Since 2004, Serbia has undertaken significant efforts to harmonise its national legislation with EU environmental requirements, successfully transposing a large part of those requirements. The process of harmonising the remaining relevant national legislation with EU environmental standards is still ongoing.

Below we provide a list of relevant national legislation along with a short description of their scope. The laws are listed in accordance with their relevance on the Project.

Document	Description
<p>The Law on Special Procedures for the Implementation of Projects for the Construction and Reconstruction of Linear Infrastructure Facilities of Special Importance for the Republic of Serbia</p> <p>("Official Gazette of the Republic of Serbia", no. 9/2020)</p>	<p>This law applies to projects for the construction and reconstruction of linear infrastructure facilities of special importance to the Republic of Serbia. The Belgrade Metro represents precisely such a project of exceptional significance, and this law is of primary importance for it.</p> <p>The law regulates the determination of public interest for complete and partial expropriation and temporary occupation of real estate for the construction and reconstruction of these facilities, determination of expropriation beneficiaries, special expropriation procedures, financial resources for project implementation, special procedures, and conditions for obtaining necessary documentation, permits, and approvals required for the construction and reconstruction of these facilities. Additionally, other issues are regulated to achieve more efficient implementation of projects for the construction and reconstruction of linear infrastructure facilities of special importance to the Republic of Serbia.</p> <p>Projects of special importance to the Republic of Serbia, as referred to under this law, are understood to be projects for the construction and reconstruction of linear infrastructure facilities that affect: the overall development of the Republic of Serbia, balanced regional and local economic development, international, regional, and inter-territorial connectivity, general improvement of connectivity, prevention of degradation of parts of the territory of the Republic of Serbia, meeting and improving the basic life needs of the population, social development, environmental protection, and thereby improving the overall standard of living of the citizens of the Republic of Serbia.</p> <p>All procedures carried out in accordance with the provisions of this law are considered urgent. All state institutions and organs of local self-government, economic entities and public enterprises, as well as other bodies and institutions exercising public authority, are obliged to promptly adopt acts within their competence.</p> <p>In accordance with Article 12 of this law, if evidence prescribed by this law is not provided with the expropriation proposal, the competent authority shall, within three days, order the expropriation beneficiary to provide them, with an obligation to submit the documentation within three days from the date of receipt of the request for additional documentation. If the necessary documentation is not provided within the mentioned</p>

Document	Description
	<p>deadline, the competent authority shall dismiss the proposal by a decision against which an appeal is allowed within three days from the date of execution.</p> <p>The owner of the real estate is obliged to respond to the expropriation proposal no later than five days from the date of receiving the expropriation proposal, in writing or on a record at the competent authority. Upon receipt of the owner's response, or after the expiration of that period, the competent authority shall immediately, but no later than within five days, provided other conditions prescribed by this law are met, issue a decision on the expropriation of the real estate.</p> <p>If during the proceedings, the competent authority encounters a fact for which it believes that additional evidence is necessary, it may schedule an oral hearing within three days from the date of receipt of the expropriation proposal.</p> <p>Against the aforementioned decision on expropriation of real estate by the competent authority (which is carried out in case the owner of the real estate has not responded to the expropriation proposal within 5 days), an appeal can be lodged with the Ministry of Finance, within eight days from the date of receipt of the decision.</p>
<p>The Expropriation Law</p> <p>("Official Gazette of the Republic of Serbia", No. 53/95, "Official Gazette of the Federal Republic of Yugoslavia", No. 16/2001 - Decision of the Supreme Court of Serbia and Montenegro, and "Official Gazette of the Republic of Serbia", No. 20/2009, 55/2013 - Decision of the Constitutional Court and 106/2016 - authentic interpretation).</p>	<p>This central law represents the main framework for expropriation in Serbia. Real estate can be expropriated or property rights over them can be restricted only in the public interest determined by law, with compensation that cannot be lower than market value. The public interest for the expropriation of immovables is determined by law or by the decision of the Government in accordance with this law. For the purposes of this law, immovables are considered to be land, buildings, and other structures.</p>
<p>The Law on Housing and Maintenance of Buildings</p> <p>("Official Gazette of the Republic of Serbia", No. 104/2016 and 9/2020)</p>	<p>This Law regulates: sustainable housing development, building management, use and maintenance of the building, common and separate parts of the building, eviction and relocation procedure, housing support, registers and records, supervision of the implementation of the provisions of this Law and other issues of importance for housing policy.</p> <p>Sustainable housing development refers to public interest.</p> <p>Section V of the law specifically articles 78 and 79 provide rights and obligations in cases of resettlement and eviction from temporary and public housing. The law stipulates requirements that alternative housing is provided for households that need to be relocated but have no other property to which to relocate.</p> <p>The Law also makes reference to the previous Housing Law ("Official Gazette of the Republic of Serbia", No.50/92, ... , 104/16) which includes provisions for housing arrangements that are remnants of the previous socialist regime where public servants and employees in public companies obtained indefinite or temporary tenancy rights to housing with option to become owners. The current law does not recognise this category anymore, but states that provisions of the previous law applicable to this category are still in force.</p>
<p>Law on Strategic Environmental Impact Assessment</p> <p>("Official Gazette of the Republic of Serbia", No. 135/2004 and 88/2010)</p>	<p>This law regulates the conditions, methods, and procedures for assessing the impact of certain plans and programs on the environment (strategic assessment), aiming to protect the environment and promote sustainable</p>

Document	Description
	development by integrating fundamental principles of environmental protection into the process of preparing and adopting plans and programs.
The Environmental Impact Assessment Law ("Official Gazette of the Republic of Serbia", No. 135/2004 and 36/2009)	This law regulates the conditions, manner, and procedure for assessing the impact of certain plans, programs, and projects on the environment. Additionally, it governs the scope and content of spatial, urban planning, and technical documentation.
The Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia", No. 18/2016, 95/2018 - authentic interpretation, and 2/2023 - decision of the Constitutional Court)	The administrative procedure represents a set of rules that state authorities and organizations, bodies and organizations of provincial autonomy, bodies and organizations of local self-government units, institutions, public enterprises, special bodies through which regulatory functions are exercised, and legal and natural persons entrusted with public authorities (authorities) apply when resolving administrative matters.
The Law on Obligations ("Official Gazette of the Socialist Federal Republic of Yugoslavia", No. 29/78, 39/85, 45/89 - decision of the Constitutional Court and 57/89, "Official Gazette of the Socialist Republic of Yugoslavia", No. 31/93, "Official Gazette of the Federal Republic of Yugoslavia", No. 1/2003 - Constitutional Charter and "Official Gazette of the Republic of Serbia" No. 18/2020)	This law deals with mandatory legal relationships arising from contracts, torts, unjust enrichment, unauthorized management, unilateral declarations of intent, and other facts specified by law.
The Law on Planning and Construction ('Official Gazette of the Republic of Serbia', no. 72/2009, 81/2009 - corr., 64/2010 - decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 - decision of the Constitutional Court, 50/2013 - decision of the Constitutional Court, 98/2013 - decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023)	<p>This law regulates the conditions and manner of spatial planning, development, and use of construction land and facilities, supervision over the implementation of the provisions of this law and inspection supervision, as well as other important issues related to spatial planning, development, and use of construction land and facilities.</p> <p>It should also be noted that according to Article 134a of this law, an investor investing in the construction of linear infrastructure facilities of special significance for the Republic of Serbia is obliged to provide the owner of a residential building constructed before the spatial plan designating the land for public purposes came into force, with another suitable residential building or apartment, regardless of whether proceedings for the legalization of that building have been initiated, or to pay them monetary compensation in the amount necessary to provide another suitable residential building or apartment.</p>
Law on the Basics of Property Relations ("Official Gazette of the Socialist Federal Republic of Yugoslavia", No. 6/80 and 36/90, "Official Gazette of the Federal Republic of Yugoslavia", No. 29/96 and "Official Gazette of the Republic of Serbia", No. 115/2005 - consolidated law)	This fundamental law establishes the central principles of property ownership in Serbia. It serves as the foundation for all processes of acquiring land, ensuring the respect of legal property rights, and providing a framework for determining fair compensation.
Law on Construction Land ("Official Gazette of the Socialist Republic of Serbia", No. 20/79, 16/83, 38/84, 14/86, 27/86 - consolidated text, 45/89, 2/90 - correction, 23/90 -	This law regulates the basics of the legal framework for construction land, property rights, and other real rights related to land in developed areas where property rights exist and establishes principles for the development and use of construction land.

Document	Description
consolidated text and "Official Gazette of the Republic of Serbia", No. 3/90 - correction, 53/93, 67/93, and 48/94)	
Law on Public Property ("Official Gazette of the Republic of Serbia", no. 72/2011, 88/2013, 105/2014, 104/2016 - other law, 108/2016, 113/2017, 95/2018, and 153/2020)	<p>This law regulates the right of public property and certain other property rights of the Republic of Serbia, autonomous provinces, and units of local self-government. Public property includes the right of ownership of the Republic of Serbia (state property), the right of ownership of an autonomous province (provincial property), and the right of ownership of a unit of local self-government (municipal or city property).</p> <p>Public property includes natural resources, goods of public interest, and goods in general use for which it is determined by law to be in public ownership, items used by the bodies and organizations of the Republic of Serbia, autonomous provinces, and units of local self-government, public institutions, public enterprises, and other organizations established by the Republic of Serbia, autonomous provinces, and units of local self-government, and other items that are, in accordance with the law, in public ownership.</p>
Law on State Survey and Cadastre ("Official Gazette of RS", No. 72/2009, 18/2010, 65/2013, 15/2015 - decision of the Constitutional Court, 96/2015, 47/2017 - authentic interpretation, 113/2017 - another law, 27/2018 - another law, 41/2018 - another law, 9/2020 - another law and 92/2023)	<p>This law regulates professional activities and tasks of state administration related to state surveying, real estate cadastre, cadastre of infrastructure and underground facilities, basic geodetic works, address registry, topographic-cartographic activities, real estate valuation, geodetic-cadastral information system, and National Infrastructure for Geospatial Data, as well as geodetic works in engineering and technical activities.</p>
The Law on the Procedure of Registration in the Real Estate Cadastre and Cadastre of Infrastructure ("Official Gazette of the Republic of Serbia", No. 41/2018, 95/2018, 31/2019, 15/2020, and 92/2023)	<p>This law regulates the rules of procedure for registration in the real estate cadastre and the cadastre of infrastructure and underground facilities, their maintenance, the subject, and types of registration in that procedure, the rules of issuing extracts from the said registers, as well as other issues relevant to the maintenance of the real estate cadastre and the infrastructure cadastre. The provisions of this law regulating the subject and types of registration also apply to the procedure for the renewal of the cadastre, unless otherwise specified by law.</p>
Law on Agricultural Land ("Official Gazette of the Republic of Serbia", no. 62/2006, 65/2008 – other law, 41/2009, 112/2015, 80/2017, and 95/2018 – other law)	<p>This law regulates the planning, protection, development and use of agricultural land, the supervision of the implementation of this law and other issues of importance for the protection, development, and use of agricultural land as a good of public interest.</p> <p>Agricultural land is a good of public interest for the Republic of Serbia, which is used for agricultural production and cannot be used for other purposes, except in cases and under conditions determined by this law.</p>
Law on the Capital City ("Official Gazette of the Republic of Serbia", No. 129/2007, 83/2014 - other law, 101/2016 - other law, 37/2019, and 111/2021 - other law)	<p>This law regulates the status, competences, and organs of the city of Belgrade, the capital city of the Republic of Serbia. For all matters not regulated by this law but related to the city of Belgrade as a local self-government unit, the provisions of the Law on Local Self-Government shall apply.</p>
Law on Local Self-Government ("Official Gazette of the Republic of Serbia", no. 129/2007, 83/2014 - other law, 101/2016 - other law, 47/2018, and 111/2021 - other law)	<p>This law regulates local self-government units, the criteria for their establishment, competences, bodies, supervision of their acts and work, protection of local self-government, and other issues important for the exercise of the rights and duties of local self-government units.</p>
Law on Communal Services	<p>This law defines Communal Services and regulates the general conditions and manner of their provision. According to this law, communal services</p>

Document	Description
("Official Gazette of the Republic of Serbia", no. 88/2011, 104/2016 and 95/2018)	are activities that provide utilities essential for meeting the living needs of individuals and legal entities. Local government units are obligated to create conditions for ensuring the appropriate quality, scope, accessibility, and continuity of these services, as well as to oversee their provision. Communal services are considered activities of general interest, they include but are not limited to: supply of drinking water, treatment and disposal of rainwater and wastewater, production, distribution and supply of thermal energy, municipal waste management, urban and suburban passenger transport, cemetery management and burial, management of public parking spaces, provision of public lighting, management of the town markets, maintenance of streets and roads, maintaining cleanliness in public areas, chimney sweep services, maintenance of public green areas and pest control activities.
The Law on Trade ("Official Gazette of the Republic of Serbia", No. 52/2019)	This law regulates the conditions and manner of conducting business in the single market of the Republic of Serbia, the promotion of trade and market protection, the prohibition of unfair market competition, and supervision.
The Law on Labour ("Official Gazette of the Republic of Serbia", no. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017 - decision of the Constitutional Court, 113/2017, and 95/2018 - authentic interpretation)	Rights, obligations, and responsibilities arising from employment are regulated by this law and by special laws, in accordance with ratified international conventions. These rights, obligations, and responsibilities can also be established by collective agreements and employment contracts. However, internal work regulations can only define them in specific situations, provided such situations are foreseen by this law.
The Law on Water ("Official Gazette of the Republic of Serbia", no. 30/2010, 93/2012, 101/2016, 95/2018, and 95/2018 – other law)	This law regulates the legal status of water, integrated water management, management of water bodies and water land, sources and methods of financing water activities, supervision of the implementation of this law, and other issues important for water management.
The Law on Forests ("Official Gazette of the Republic of Serbia", no. 30/2010, 93/2012, 89/2015, and 95/2018 – other law)	This law regulates the preservation, protection, planning, cultivation, and utilization of forests, as well as the disposal of forests and forest land, supervision over the implementation of this law, and other matters significant for forests and forest land.

3.2 IFC Performance Standards

For the purpose of this assignment, special attention will be paid to the two Performance Standards most relevant to the Project – IFC PS1 which includes, among other things, requirements for effective and meaningful communication with stakeholders, including the grievance redress and IFC PS5, which refers to the requirements for land acquisition, displacement and impacts on livelihoods.

In accordance with these standards the client is required to:

IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts

- Identify and assess potential environmental and social impacts early in the project lifecycle to minimize risks and maximize positive outcomes.
- Actively engage with all relevant stakeholders, especially local communities, throughout the project's life cycle. This includes transparent disclosure of project information and open consultations on issues directly affecting them.
- Establish and maintain a robust Environmental and Social Management System (ESMS) tailored to the project's specific needs and risks. This system helps manage environmental and social performance throughout the project lifecycle, promoting resource efficiency and minimizing environmental footprint.

- Continuously monitor and evaluate environmental and social performance, seeking opportunities to improve and adapt practices for a more sustainable outcome.

IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement

- Prioritize avoiding or minimizing the need for land acquisition and resettlement altogether. This involves exploring alternative project designs and locations.
- Fairly compensate affected individuals and communities in accordance with the market value of their land and assets if land acquisition is unavoidable.
- Support affected communities in restoring their livelihoods through job training, relocation assistance, or access to new land or resources.
- If resettlement is unavoidable, provide the resettled communities with access to housing, infrastructure, and services equal to or better than their previous living conditions. This includes involving affected communities in planning and implementing resettlement activities.

3.3 Summary of Main Gaps between National Legislation and IFC PS

Although national legislation is largely aligned with the requirements of the IFC standards, certain differences exist. To highlight these, we present an analysis of differences organized in a tabular format following the structure of the IFC Performance Standards.

It should be noted that some criteria, such as grievance mechanisms and community engagement, are applicable to both PS1 and PS5 but are included together in the table below.

Table 1 Gap Analysis between IFC PS and the National Legislation

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
Socio-economic impact assessment	PS1 requires an integrated assessment approach in order to properly identify the environmental and social impacts, risks and opportunities of a project.	<p>The Law on Environmental Impact Assessment includes requirements for establishing the socio-economic baseline of the project area and identifying the impacts on land acquisition, but it does not require a detailed analysis of social impacts. Other laws and regulations include requirements for partial assessments, including regulations related to the development of planning documents (spatial plans, regulatory plans) and feasibility studies.</p> <p>In the process of expropriation, the assessment of socio-economic impacts is first conducted through planning documentation and then in more detail through the Project of Parcelisation, where public and private land and property necessary for expropriation are defined, and holders of rights to that property are identified. The Expropriation Law prescribes mitigation measures (types of compensation and administrative procedures) according to the type of impact on the property.</p>	<p>The analysis of socio-economic impacts according to national regulations is conducted through various studies and documents, with no requirement for the impacts to be integrated or cross-referenced with each other.</p> <p>However, this Project is being developed in accordance with international standards, so an Environmental and Social Impact Assessment has been conducted according to IFC standards and the Equator Principles.².</p>	RAP is being prepared for the purposes of the Project, and among other things, includes an analysis of identified risks and impacts directly and indirectly related to the land acquisition process.
Cumulative impact assessment	PS1 entails the assessment of cumulative impacts, taking into account the combined effects of the Project with other existing or planned activities within the impact zone. This analysis aids in identifying and mitigating potential environmental and	Within Serbian legislation, there is a requirement for the analysis of cumulative impacts of the project, but without a clear definition of criteria for cumulative analysis. The Environmental Impact Assessment Law focuses on analysing impacts caused by individual projects. The requirement for conducting cumulative impact analyses may	<p>The lack of cumulative impact analysis, especially in developed environments, can lead to underestimation of potential ecological and social risks.</p> <p>However, considering that the Project is being developed in</p>	In conducting further analysis within the preparation of the RAP, Arup and BMV have identified all planned development projects in areas affected by the Project and collaborated with regulatory authorities, both local and national, to coordinate activities related to the Project in order to minimize the

² Equator Principles IV (July 2020)

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
	social risks that might otherwise be overlooked.	arise as a result of other regulations, including spatial or urban planning regulations.	accordance with international standards, an Environmental and Social Impact Assessment has been conducted according to IFC standards and Equator Principles, which includes an analysis of cumulative impacts.	cumulative impact on local communities.
Stakeholder engagement	<p>PS1 requires active communication and consultations with all stakeholders, particularly involving consultations with the local community, including marginalized groups, socially or economically disadvantaged groups, and indigenous peoples (if located within the project's impact zone), throughout the entire planning and implementation cycle of the project.</p> <p>This involves adequate disclosure of information about potential impacts, collecting feedback, and consideration of received grievances during the decision-making and project development.</p>	<p>The Environmental Impact Assessment Law and the Law on planning and construction require public debates and consultations be held at every stage of document preparation, which typically includes information on land expropriation.</p> <p>The legal framework for these consultations is precisely defined in terms of when they should occur, how long the documents need to be publicly disclosed, and generally what they should encompass.</p> <p>Owners of parcels involved in the expropriation process are contacted directly after the public interest announcement, i.e., upon submission of the expropriation proposal. The expropriation process unfolds in two phases: (1) establishing status on the formal expropriation proposal and (2) establishing the compensation for the expropriated property. Both phases are conducted through individual consultations with the owners and official correspondence.</p>	In the current legal framework for expropriation in Serbia, key provisions for early engagement with stakeholders and their meaningful participation in the decision-making process are lacking. Individuals affected by potential expropriation have the opportunity to learn about it through public announcements, but it is often the case that they are not informed until they receive the expropriation proposals in writing, leaving them without a voice at crucial early stages of project development.	<p>BMV should strive to create a comprehensive stakeholder engagement plan in accordance with IFC standards, after identifying all relevant and affected stakeholders. Instead of developing a separate SEP, the existing SEP for the Project will be updated to include the specific actions regarding notifications to the affected communities related to land acquisition and resettlement.</p> <p>Within the stakeholder engagement plan, clear guidelines for engaging stakeholders should be developed, specifying the frequency, scope, and methods appropriate for different project elements and affected communities.</p> <p>Certain suggestions and guidelines have been provided in the RAP.</p>
Grievance mechanism Accessibility and efficiency	PS1 and PS5 both require a transparent, accessible and culturally sensitive grievance mechanism, so that affected communities can effectively resolve the issues facing them.	<p>The Law on Expropriation and the Law on Environmental Impact Assessment, as well as several other laws, regulate similar appeal mechanisms in different areas.</p> <p>Publishing and resolving grievances is mandatory in the process of adopting the</p>	Although the Republic of Serbia has established grievance mechanisms according to various laws, their effectiveness may be limited.	<p>Within the RAP a grievance mechanism applicable to the expropriation process has been defined, specifying:</p> <p>Procedures for receiving and processing complaints</p>

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
	<p>This includes clear procedures, timely responses to submitted grievances, and their just resolution.</p>	<p>planning documentation, impact assessment studies, and in the design process. This is a formal process with defined procedures and limited deadlines for receiving grievances.</p> <p>Legal remedies are available at every stage of the process.</p>	<p>The procedures can sometimes be complex, communication channels unclear, and the capacities of relevant institutions for timely and fair resolution may be lacking.</p> <p>In the process of expropriation, national legislation recognizes the right to appeal at different stages of the expropriation procedure, but it does not mandate the establishment of a dedicated non-institutional mechanism for resolving grievances.</p>	<p>Options for submitting complaints, including an anonymous submission option</p> <p>Roles in the grievance redress process and necessary capacities</p> <p>Timeframes for all phases of the process</p> <p>Methods for disseminating information on the grievance mechanism among affected communities</p>
<p>Monitoring and evaluation</p>	<p>PS1 and PS5 require a comprehensive monitoring and evaluation program covering all environmental and social aspects of the project, including potential impacts identified during land acquisition.</p>	<p>In the expropriation law, there is no requirement for monitoring of the process or verifying the effectiveness of adopted measures.</p>	<p>Although the legal framework does not foresee requirements for monitoring and evaluation, these measures have already been introduced through the project financing process.</p>	<p>BMV will establish a self-monitoring process through which they will collect information needed to track the completion of the administrative processes involved in the land acquisition process and track the status of provision of entitlements for each Project Affected Person</p> <p>conduct targeted engagement with the resettled households (particularly those identified as vulnerable and highly impacted) in the early stages to track their ability to acquire suitable replacement residences or business properties</p>

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
Avoidance or minimization of displacement	The PS5 mandates that during planning and design, efforts should be made to avoid or minimize acquisition of land and property, especially those privately owned, and to especially avoid physical displacement. This includes assessing alternative project locations and modifying project solutions.	In the Expropriation Law, there is no explicit requirement to avoid or minimize displacement. Other laws require that planning documentation (spatial plans, regulatory plans) and projects (feasibility studies) must take into account social impacts, including physical displacement. Displacement is often avoided in practice to reduce the costs of expropriation and construction.	<p>There are no specific gaps noted in requirements related to this Project.</p> <p>Physical displacement has been largely avoided by choosing land without residential structures for the project location.</p> <p>The risk of economic displacement is quite high but expected given the location of the Project in the urban city centre.</p>	No further action needed.
Compensations and benefits for displaced persons	<p>The PS5 requires compensation for land, property, and losses related to the renewal of livelihood assets to be determined according to market value.</p> <p>The emphasis is on the need to restore household and community livelihoods to the level before the onset of displacement.</p>	The Law on Expropriation defines fair market value based on data from recent registered sales, according to information from the tax authority and expert assessments. National legislation, besides fair market value, does not define compensation for moving costs, transitional support, or compensation for loss of income due to displacement (formal and informal).	Due to some discrepancies in the methodology for defining compensation between national legislation and IFC standards, it is necessary to develop a clear methodology that will be applied to the Project, in order to avoid neglecting certain factors and to enable the same principle for all owners.	<p>Within the RAP, an entitlement matrix has been defined, outlining for each category of impact the necessary form of compensation and additional assistance.</p> <p>Special measures have been defined for the loss of property, loss of income sources, and loss of access to public and private property.</p> <p>For each type of compensation and assistance identified in the entitlement matrix the RAP has defined a methodology for the valuation of property, basis of the calculation as well as methodology for calculation the additional cash compensation types needed to meet the PS5 requirements.</p> <p>Additionally, all PAPs have been split into specific categories based</p>

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
				<p>on the scope of impact and therefore the entitled compensation.</p> <p>The RAP will be prepared by end of August 2024 and publicly disclosed.</p>
Planning the resettlement process and livelihood restoration	PS5 requires the development of a Resettlement Action Plan (RAP) for all cases of physical and economic displacement, regardless of the number of affected people	The legislation of Serbia does not prescribe mandatory development of a RAP, regardless of the extent of the expropriation process. The only exception is for specific categories of individuals as defined by the Housing Law. In the case of relocation of these individuals, the mentioned law prescribes the mandatory issuance of a Decision on the necessity of relocation with a relocation plan.	This gap has already been identified, and Consultant has been appointed to prepare the Resettlement Action Plan for the Project.	No further action is required.
Physical displacement	PS5 requires compensation at full replacement cost for lost land and other property, including intangible losses.	<p>Expropriation is carried out in a universal manner defined by law. The market value of the residential property is taken into account, but not the support for re-establishing residential space (there is no fast administrative procedure for permits, licenses, or utility connections). There is no compensation for relocation costs, material and immaterial losses caused by relocation, or transitional support, which can lead to unfair compensation or endangerment of livelihoods.</p> <p>Article 51 of the Expropriation Law provides for the possibility of paying compensation that is higher than the market value, taking into account the material and other personal and family circumstances of the previous owner, if these circumstances are of significant importance for their existence (number of household members, number of household members capable of earning a living or</p>	<p>There are small differences in the process of defining compensation, particularly in the context of providing additional assistance to households during the resettlement process.</p> <p>Based on preliminary analysis, it has been determined that there are both formal and informal residential structures in the affected locations, so it is necessary to define appropriate compensation.</p>	<p>The RAP has defined compensation and other measures of additional assistance for individuals and households who will be physically displaced due to the Project.</p> <p>The RAP also defines the time frames in the process of physical relocation, including consultations with previous owners or users at all stages of the process.</p>

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
		<p>employed, health condition of household members, monthly household income, etc.). This article enables the definition of additional assistance to socially vulnerable families who are owners of residential properties, but not to informal owners/users of properties.</p> <p>Recent amendments to the Planning and Construction Law provide for compensation rights for informal residential structures. In the event that the structure existed at the time of adoption of the planning document, the owner of the structure is entitled to the market value of the structure. Other forms of assistance or compensation (relocation costs, transitional allowance, additional assistance due to social status, etc.) are not provided for by the law.</p> <p>The compensation for informal business premises, beyond the compensation based on their construction value prescribed by the law on special procedures (under specific conditions), is not defined.</p>		
Loss of livelihoods	<p>PS5 requires recognition and resolution of all forms of economic displacements, directly or indirectly caused by the implementation of the Project. This implies permanent or temporary loss of access to land or other resources or assets on which income is dependent.</p> <p>In addition to compensation for the loss of land or facilities that are a primary source of income, PS5 also defines transitional allowance to cover the time</p>	<p>The Expropriation Law provides compensation for loss of income, upon submission of a claim, in the case of the loss of agricultural land cultivation of which is the primary source of income for the previous owner. Compensation takes the form of providing substitute property of the same type and class or corresponding value in the same place or nearby area (Article 15). According to the same article, a former owner whose property used for livestock breeding or for storage or processing of agricultural products is expropriated, and whose income from these activities is a primary source of income, has the right to compensation for another property</p>	<p>In the national legal framework, there often lacks a clear definition of economic displacement, and it may not fully recognize all forms, especially those not directly related to physical land acquisition.</p> <p>Failure to identify informal owners can be a potential risk for the Project.</p>	<p>Within the RAP, specific measures have been identified for compensating for the loss of livelihood, as well as additional measures to support the owners in identifying and exploiting alternative revenue sources.</p> <p>In the process of defining measures for compensation, the following has been considered:</p> <ul style="list-style-type: none"> - The need for and effectiveness of measures due to temporary reduction in income.

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
	needed to reestablish the lost source of income.	<p>where they can continue to carry out their activities.</p> <p>According to Article 16 of the expropriation law, the expropriation beneficiary is obliged, upon request, to provide the previous owner of the business premises, ownership or co-ownership of another business premises at the same location or in the vicinity that structurally and in terms of surface area meets the requirements for conducting the activities that the previous owner had before expropriation.</p>	National legislation does not recognize transitional allowance for loss of livelihood.	<ul style="list-style-type: none"> - Need and effectiveness of measures due to permanent loss of business activities - Indirect costs - Loss of earnings for employees - Social vulnerability <p>In the process of defining support for the identification of alternative livelihoods, the following has been considered:</p> <ul style="list-style-type: none"> - Training and skill development through existing programs - Employment or engagement on the Project - Access to existing microfinance initiatives
Possession of acquired land and related assets	PS 5 notes that the project developers will take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.	<p>The Expropriation law defines the process for the expropriation of land required for developments that are considered of public interest. Under the Law, expropriation must be completed and all project affected persons compensated in comparable land or in monetary terms, before the Building Permit (or Construction License) is issued to the contractor to mobilise and start the civil works.</p> <p>In the event that a project affected person (s) disagrees with the offered compensation in either form, they can resort to the judicial process, which can take a long time to resolve (due to court capacity). To ensure that this process does not delay the implementation of</p>	There are provisions in the national legislation that allow the government to take possession of the land even if the PAPs have not received compensation. However the provisions outlined under article 35 are a mechanism that is utilised on an exceptional basis, and the beneficiary of expropriation needs to provide justification for initiating this mechanism.	<p>The RAP has provisions to align with PS5 requirements, based predominantly on extended timeframes for implementation of the RAP to allow for time for the resolution of court cases (if any).</p> <p>BMV intends to adopt the approach of timely consultation and implementation and avoid, to the extent possible, taking possession of property prior to compensation being paid out.</p> <p>Provisions of the Expropriation Law prescribe requirements for the Beneficiary of Expropriation to provide suitable temporary housing</p>

Topic	IFC performance standard requirements	Requirements according to national legislation	Identified gaps	Corrective measures
		<p>the project the Law also includes provisions that ensure the Beneficiary of Expropriation gets permission to access to the disputed plots. This is described under Article 35 of the Expropriation law which stipulates that the Beneficiary of Expropriation can request the Ministry of Finance, on an exceptional basis to issue permission to take possession of land without the paid compensation.</p> <p>There is no specific timeframe from when the compensation offer is provided to the PAP to when the Declaration by the Ministry of Finance based on article 35 is issued, but in practice this is typically used as a last resort for the public developers.</p> <p>Even then, article 16 of the Expropriation Law states that temporary replacement accommodation has to be provided to the previous owner, until a permanent solution is agreed, and compensation provided.</p> <p>Forced evictions are not allowed under national legislation, without a substantial prior justification and consultation process. Forced evictions of socially or economically vulnerable persons is only allowed if alternative social housing has been provided.</p>		<p>for the residents of expropriated assets, and temporary business premises for the affected businesses. This includes the additional compensation for moving costs to/from the temporary premises.</p> <p>The initially offered compensation will also remain available to the PAPs throughout the judicial process, should they decide to abort that process.</p>

3.4 Institutional Framework

The process of expropriation is complex, involving multiple participants, each with specific roles and responsibilities. Below are some of the participants and their respective roles:

Beogradski metro i voz (BMV) is the Beneficiary of Expropriation and as such responsible for coordinating the land acquisition and resettlement process. BMV is responsible for the preparation of comprehensive reports and detailed documents, ensuring that all relevant information is accurately captured and presented. They maintain consultations at all stages of the process, engaging with stakeholders to gather input and address concerns. This involvement of interested parties is crucial for fostering transparency and collaboration. Additionally, BMV provides a robust feedback mechanism, allowing for continuous improvement and adaptation based on stakeholder input. They monitor the process to ensure compliance with established guidelines and timelines, regularly reporting their findings and progress to the Bank. Moreover, BMV oversees the interim procedures, ensuring that each phase of the project is executed smoothly and efficiently, mitigating any potential issues before they escalate. BMV will be responsible for coordination with the National Employment Agency and institutions for upskilling to ensure that the PAPs whose livelihoods are affected by the expropriation process get access to training and new employment opportunities.

Belgrade Land Development Public Agency (Beoland) is implementing the expropriation process for the Project, including consultations with owners and users, arranging valuation of property and administration of expropriation documents as well as coordination of activities with City Municipalities (CMs). In their role of the implementing entity, Beoland is responsible for determining the monetary compensations for the affected properties relying on the valuation from the tax administration (for land) and valuers (for structures and crops/plants for residential properties, and for structures and income for commercial properties) along with compensation for moving costs and transitional allowance. Beoland is also responsible for identifying alternative housing arrangements for households under the Housing law and determination of the compensation for loss of income for the affected businesses.

Ministry of Finance of the Republic of Serbia plays a crucial role as the contracting party in the expropriation process, overseeing all legal and financial aspects. They are responsible for ensuring that all steps are conducted in accordance with legal provisions and regulations. Additionally, the ministry acts as the appellate body in the expropriation process, addressing appeals and objections that may arise during the initial proceedings. This ensures fairness and legality in the expropriation process, enabling fair compensation and respect for the rights of all involved parties.

The Tax Administration plays an important role in determining the market value of the land being expropriated. They assess the value of the land based on current market conditions, considering factors such as location, purpose, and current real estate prices. This assessment is crucial for ensuring fair compensation to the landowners whose property is being expropriated, making sure they receive appropriate value for their property. The Tax Administration also ensures that the evaluation process is transparent and compliant with legal standards, thus protecting the rights of all parties involved in the expropriation process.

The Real Estate Cadastre provides official information about real estate, including details about properties and the titleholder of ownership rights. This database is crucial for legal security and transparency in real estate transactions, as it contains accurate and up-to-date data on ownership, parcel boundaries, and property characteristics. Information from the cadastre is available to all interested parties, allowing them to make informed decisions when buying, selling, or investing in real estate. The cadastre also plays an important role in procedures such as mortgages, expropriation, and urban planning, providing reliable data necessary for these processes.

City municipalities of Čukarica, Palilula, Stari Grad and Savski Venac are responsible for processing expropriation proposals and administration of the compensation process. They play a crucial role in implementing these procedures, evaluating proposals to ensure they comply with legal standards and the interests of the local community. Within their jurisdiction, the municipalities perform administrative tasks and organize meetings with property owners and other stakeholders to ensure fair and transparent resolution of all issues related to expropriation. Additionally, they coordinate the compensation process, ensuring that landowners receive adequate compensation for expropriated land and that the entire procedure is carried out efficiently and justly. Within this process the CMs are responsible for administrating the process and

ensuring the documentation is signed-off, while the City of Belgrade makes the actual payments of the determined compensation to the previous owners.

If an agreement on compensation for expropriated property cannot be reached, **the Court of General Jurisdiction** determines the fair compensation for the expropriated value. This judicial process involves assessing the market value of the property and considering various factors such as its location, condition, and any special characteristics that may affect its value. During the judicial process both parties (owner and government) can appoint their own valuation experts to provide the valuation as evidence. The court aims to ensure that the compensation awarded is just and equitable, considering both the rights of the property owner and the public interest served by the expropriation. This judicial oversight helps to resolve disputes fairly and legally, providing clarity and recourse in cases where negotiations fail to produce a mutual agreement on compensation.

3.4.1 Expropriation process under national legislation

Expropriation involves the legally regulated, forced transfer of property rights from private ownership to state ownership.

Public Interest

The Law on Expropriation requires the Beneficiary of Expropriation to justify the need for expropriation and to demonstrate that the scheme cannot occur without the proposed expropriation. The declaration of public interest is a special procedure, which precedes and enables any property acquisition and expropriation. When the scheme is declared to be “of public interest,” a concrete expropriation proposal by the Beneficiary of Expropriation is prepared and then submitted.

Public interest for expropriation, i.e. administrative transfer of immovable property – land and structures on the land for the purposes of construction of the phase 1 Line 1 of the Belgrade Metro, was determined by the Decision of the Government of the Republic of Serbia, No 465-329/2022 dated 28.01.2022 published in the “Official Gazette of the Republic of Serbia“ No. 102/21.

Notification and Decision of Expropriation

The expropriation process is triggered when an authorized entity (referred to as the Beneficiary of Expropriation) submits a proposal for expropriation following the declaration of public interest. The owners of the property are notified of the proposal for expropriation.

A concrete expropriation proposal is prepared for each property owner that contains the amount of land involved, the outline for the determination of the assessment of fair value for any immovable property (reference to the applicable legal framework), the justification of the need for the specific expropriation, together with the confirmation that the scheme is included in the relevant regional and/or spatial plan. The proposal is prepared by referring to the Cadastre Register, which provides details on the title holder, the immovable property, the type of land, and the area of the affected land.

The concrete expropriation proposal includes the Beneficiary of Expropriation issuing the confirmation for securing the funding for the expropriation. The concrete expropriation proposal also obliges the Beneficiary of Expropriation to submit a request to the Cadastre Office, Land Registry, or other public register, to prevent any transaction (Article 32) on the land to be expropriated.

The property owner has just five days to decide on the proposal for expropriation. Once the owner responds, the competent authority must promptly make a Decision on the Expropriation within fifteen days at most.

Article 4 - The owner of the expropriated real estate changes on the day the Expropriation Decision comes into effect (complete expropriation).

The property owner can challenge the expropriation decision to the Ministry of Finance. They can argue that the expropriation is not in the public interest or that the process was not conducted according to legal requirements.

At any stage during the expropriation process the PAPs have the opportunity to submit grievances to the CMs who can, in turn arrange for hearings to be organised to address the grievance.

Compensation

Compensation is a crucial aspect of expropriation. The law ensures that property owners receive fair compensation. If your property is expropriated, you are entitled to compensation that cannot be lower than the market value of the property.

Upon the legal validity of the decision on expropriation, the owners of the expropriated properties are given written offers on the compensation amount for the land, plants and structures. The offer for compensation should be submitted to the property owner within 15 days from the date that the decision on expropriation comes into effect. Prior to this the Beneficiary of Expropriation must ensure the valuation of the property. Compensation for land is determined by the Tax authority, while the compensation for crops and structures is determined by the licenced valuers.

Article 61 – If an agreement on compensation as a whole is not reached within two months from the date of the expropriation decision coming into effect, the municipal administration will submit the final expropriation decision with all documents to the competent municipal court to determine the compensation.

If the property owner disagrees with the compensation offered, they can contest the amount with the municipal court. The court will then determine the fair market value of the property and ensure the owner receives appropriate compensation. If the initial court decision is unfavourable, the property owner has the right to appeal the decision to a higher court.

Article 34 - The beneficiary of the expropriation acquires the right to take possession of the expropriated immovable property on the day the decision on compensation becomes final, that is, on the day the agreement on compensation for the expropriated immovable property is concluded, unless otherwise specified by this law.

Article 35 provides the conditions for the exemption of article 34.

The law does not specify the timeframe for the payment of compensation following the agreement on compensation, but states that the deadline for payment of compensation is agreed by the parties in the compensation agreement. This period is typically 30 days.

Other provisions

Article 16 – Beneficiary of Expropriation is required to provide to the previous owner of a residential building or apartment, or business premises, at their request, ownership or co-ownership of another residential building or apartment, or business premises in the same location or in the immediate vicinity, which in terms of structure and area corresponds to the conditions of residence, or business operations that the previous owner had before the expropriation.

4. Project Impacts

The assessment of the project impacts was conducted using the baseline inventory data produced by Beoland on the basis of the current design option and the information provided by the Cadastre. The baseline inventory (currently only available in Serbian) is not included with this RAP as it pertains private information about the property owners.

The current estimated assets under the impact of the project are expected to be reduced through following stages of design development and optimisation of land-take through splitting of land parcels to allow only the needed area is expropriated. This process is also expected to slightly reduce the impact on physical relocation and economic displacement.

4.1 Avoidance or minimization of involuntary resettlement

During the project development, the avoidance or minimization of involuntary resettlement has been a critical consideration throughout the planning and design phases. During the assessment and selection of construction methods and alignment alternatives, significant efforts were made to mitigate surface impacts and reduce both physical and economic displacement. The project predominantly favours the TBM method for constructing most of the metro line, particularly in the densely populated and highly urbanized city centre. This method is chosen to minimize disruption on the surface, thereby avoiding the need for extensive resettlement and protecting the livelihoods of affected communities.

During the Prefeasibility Study, various alternative itineraries, station locations, and shaft positions were examined to avoid complex civil works and reduce investment costs. The selected alternatives aimed to shorten the alignment length, optimize journey times, and serve key urban centralities and attractors. This comprehensive assessment also considered the capacity to improve intermodal connectivity with other public transport networks.

Moreover, specific local variants of Line 1 were evaluated to minimize resettlement impacts. For instance, the position of stations and shafts was carefully chosen to avoid densely populated areas and to reduce the impact on existing structures and businesses. This included shifting station locations to wider public spaces and modifying alignment routes to serve alternative sites, thereby optimizing the network's efficiency and accessibility while minimizing the necessity for resettlement.

4.2 Affected communities

The Project areas passes through the area administratively covered by CMs of Čukarica, Savski Venac, Stari grad and Palilula within the City of Belgrade.

The following impact zones have been identified within the Project area. Those highlighted in grey are considered outside the scope of the RAP, as noted in chapter 2.5.

City Municipality	Impacted area (m ²) ³		Station	Shaft
	Permanent for Stations	Permanent for supporting facilities		
Čukarica	36,585.44	161,232.24	Station 1 - Železnik	
	(already expropriated 19,216.39m ²)	(already expropriated 112,951.89m ²)	Station 2 - Makiš	Substation HVS Bele Vode
			Station 3 - Žarkovo	Shaft 1 – Makiš park
			Station 4 - Bele Vode	Shaft 2 - Makiš

³ The areas outlined below are only indicative at this stage. Following design optimisation and splitting of parcels, these areas are expected to change

City Municipality	Impacted area (m ²) ³		Station	Shaft
	Permanent for Stations	Permanent for supporting facilities		
			Station 5 - Trgovačka	Shaft 3 - Trebevička
			Station 6 - Požeška	
			Station 7 - Park Banovo Brdo	
			Station 8 - Ada Ciganlija	Shaft 4 – Stara Šećerana
Savski venac	19,738.45	57,528.61	Station 9 - Sajam	Shaft 5 – Most na Adi Shaft 6 - Sajam
			Station 10 - Mostar	Shaft 7 – Savski
			Station 11 - Savski Trg	Shaft 8 – Luke Čelovića
Stari grad	7,272.69	16,154.97	Station 12 - Trg Republike	
			Station 13 - Skadarlija	
Palilula	9,450.32	98,588.28	Station 14 - Dunav	
			Station 15 - Pančevački most	Shaft 9 - Pančevački most
				Shaft 10 and TBM launch
TOTAL	73,046.90 m²	333,504.10 m²		

4.3 Overview of Affected Assets

The available documentation indicates that approximately 487 parcels are anticipated to be impacted by the project, both private and public. The exact number of privately and publicly owned land parcels could not be confirmed as cadastre information seems to be incomplete, with the process of splitting the parcels still ongoing in a few locations. The area under impact has been determined through the Detailed Regulation Plan and the surveys conducted have identified and confirmed the affected assets within the Project impact area. The exact number of the affected parcels will be confirmed after the process of splitting the land parcels is completed at all locations. The splitting of parcels allows that only the area needed for the Project is actually expropriated.

There are 84 identified residential properties within the Project area and 66 affected businesses, although not all recorded businesses are operational.

A summary of impacted properties is presented in the table below. This presents the overview of the data received from Beoland, collaborated during the surveys. The data is presented linearly following the alignment of the metro line. The focus of the survey was to identify all affected structures within the area of impact, both commercial and residential. The formal status of the structures and the ownership/lease arrangements noted in the table are based on verbal statements from the interviewed persons, and the preliminary information. The actual status and ownership/lease title can only be confirmed through the formal expropriation process, through confirmation of cadastre data and valuation.

Data presents all of the elements of the Line 1 Phase 1 project, but the elements that are considered outside of the RAP (as per chapter 2.5 above) are highlighted in grey.

Table 2 Summary of impacted property

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
1		Land expropriation only. No residential or commercial structures Not within the scope of the RAP	35	2	/	/	/	/	/	/	/
2		Land expropriation only. No residential or commercial structures Not within the scope of the RAP	30	14	/	/	/	/	/	/	/
3		Land expropriation only. No residential or commercial structures Not within the scope of the RAP	20	0	/	/	/	/	/	/	/
	1	Land expropriation only. No residential or commercial structures Not within the scope of the RAP	17	0	/	/	/	/	/	/	/
	HVS 1	Land expropriation only. No residential or commercial structures Not within the scope of the RAP	2	0	/	/	/	/	/	/	/

⁴ This includes land that will be temporarily occupied during construction and following completion of construction would be utilised for public areas (landscaping, parks, parking, etc.)

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
4		Land expropriation only. No residential or commercial structures	3	11	/	/	/	/	/	/	/
	2	A cluster of residential buildings exists within the location. Majority of PAP live at the location, but there are also several vacant houses. In addition to the houses there are also auxiliary structures. Cadastre information does not match the status on site. Mixed status of formal and informal structures.	4	8	17	/	/	/	/	/	/
5		Mostly land expropriation. One residential building affected.	42	/	1	/	/	/	/	/	/
	3	Land expropriation only. No residential or commercial structures	21	/	/	/	/	/	/	/	/
6		One commercial structure affected – “NIS Petrol” gas station – operational	11	/	/	/	/	/	1	/	/
7		One commercial structure affected – coffee shop “Park” – operational, with a temporary permit.	29	/	/	/	/	/	/	1	/
	4	Two structures affected within the complex of the Sugar factory under bankruptcy - „Dimitrije Tucović-1898” – formally structures are part of the complex currently occupied by the yeast and ethanol producer „Vrenje”, who are	1	/	/	/	/	/	1 (two structures)	/	/

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
		also bankrupt. Buildings are vacant and derelict									
8		<p>Four buildings affected within the complex of the Sugar factory “Dimitrije Tucović-1898” – bankrupt. Buildings are vacant and derelict</p> <p>One commercial structure affected – “Knez Petrol” gas station – operational</p> <p>There are other structures in the vicinity as part of the old factory complex, but they are not expected to be expropriated for the Project. The businesses operating in some of these buildings are expected to incur disruptions during construction phase</p>	1	53	/	/	/	/	2 (5 buildings)	/	/
9		<p>One commercial structure temporary affected – ticket shop of the Belgrade Fair.</p> <p>Not within the scope of the RAP</p>	15	/	/	/	/	/	/	/	/
	5	Land expropriation only. No residential or commercial structures	26	/	/	/	/		/	/	/
	6	Land expropriation only. No residential or commercial structures	15	/	/	/	/		/	/	/

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
10		Land expropriation only. No residential or commercial structures	16	/	/	/	/	/	/	/	/
	7	Land expropriation only. No residential or commercial structures	4	/	/	/	/	/	/	/	/
11		There is currently an auxiliary structure within the Project area. The building is no longer in use, but was previously used as public toilet within the Main Bus station, which is currently being relocated to a new location. It is an informal structure and decision for demolition has already been initiated. Not within the scope of the RAP	10	1	/	/	/	/	/	1	/
	8	Land expropriation only. No residential or commercial structures	2	3	/	/	/	/	/	/	/
12		Commercial building – shopping centre “Staklenac” containing multiple business spaces for rent. Informal building with an expired licence. Most of the stores rented out and operational.	4	3	/	/	/	/	/	1	44 business premises
13		Commercial area – “Bajloni green market”. Temporarily the entire market is expected to be relocated during construction.	8	1	/	/	/	/	1	/	20 + stalls

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
		The green market reconstruction is an independent project by the City of Belgrade and the construction of the metro station is planned to align with the green market reconstruction. The market includes 2 administrative buildings, 8 public utility buildings, 20 commercial buildings and green market stalls. The green market will be reinstated with increased capacity so no permanent impacts are expected. Not within the scope of the RAP									
14		Two residential structures belonging to “Srbija Rail Infra” currently occupied by two separate households, employees of the Srbija Rail with formal title for lease. There is also an auxiliary structure at the location, which is sometimes used by other rail employees to sleep over, but not as permanent residential accommodation.	11	/	/	/	2	1	/	/	/
15		Several informal commercial structures exist on the location. Only two were operational during the survey – Carwash and maintenance shop and a fast food restaurant. Owners	33	/	/	/	/	/	/	2 operational 3-6 non operational	/

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
		could not be reached for interviews. Other properties were not operational for a while. Structures do not possess construction permit and the administrative process to remove the structures is ongoing.. The structures are connected with multiple entrances, so the number of individual properties is inly estimated.									
	9	Small cluster of residential structures. Three households residing at location and one owner not living at the location. Cadastre information does not match the status on site. Mixed status of formal and informal structures	25	/	1	2	1	/	/	/	/
	10	A large cluster of residential structures and several businesses. Most of the buildings in this area were once used as workers accommodation and have since been refurbished into small apartments used by former employees of the factories that have gone bankrupt. While they are not owners of the properties they had valid lease contracts with their former employees. In addition to the residential buildings there are auxiliary structures as well. Five Roma	4	26	16	9	28	8	6 (5 operational 1 non-operational)	/	/

Location		Description of location	No of land parcels impacted		Residential Buildings				Commercial Buildings / Businesses		
Station	Shaft		For Stations and shafts	For associated land ⁴	Formal owners	Informal owners	Formal – lease	Informal - lease	Formal business	Informal business	Leased property
		families have been identified within the impact area. Cadastre information does not match the status on site. Mixed status of formal and informal structures. The five business identified within the area are all operational and formally registered. One business Žitko a.d. was not operational.									
Total			389	122	35	11	31	9	11 (10 within scope of RAP)	8-11	44

A detailed database of the affected assets has been developed for the project, but will not be attached to the RAP to protect personal data of the affected persons.

4.4 Overview of ownership

Land parcels

The list of affected land parcels presented in Table 2 includes publicly and privately owned land parcels. As indicated above, the list of affected parcels is not final as some locations still need to go through the process of splitting the land parcels to ensure only the required areas are actually expropriated.

Publicly owned land parcels will be acquired through administrative transfer.

The impacted area is within an urban environment, so the majority of privately owned land parcels include some kind of structure. However there are a number of privately owned land parcels that do not have any structures on them. These are mostly vacant land parcels that are not used to generate livelihoods for their owners. They typically include common areas around residential buildings with multiple flats (flat owners own a percentage of the land parcel under the building and common areas around the building), informal access roads, or in some cases are used by the owners as gardens. In cases where land is cultivated, the owners will be entitled to the loss of crops under the RAP, but as these tend to be small in size, no livelihood measures are expected.

Land valuation for construction land is typically quite favourable for PAPs, especially in Belgrade where the market is quite competitive.

Residential

As indicated in the table above, there are a number of categories of informal owners and users of property within the Project affected area. Some of the owners have legitimate conditions for legalisation of the property and have instigated legalisations procedures. Some have met the conditions but have not started the legalisation procedure. This refers predominantly to the locations for Shaft 2, Shaft 9 and Dunav Station.

However for most of the owners and users at location Shaft 10 with TBM obtaining formal title is not possible due to the status of the formal owners. Specifically, the residents of the old workers barracks at shaft 10 who worked for publicly owned companies – their lease contracts are effectively expired and with the companies now in bankruptcy or dissolved, there is no way for them to renew their lease contracts. Their formal title to lease this property is recognised under the law, as the conditions under which the lease contracts had been issued had not changed. Under their original agreements the tenants have had to pay rent on these properties. Some of the tenants noted during the survey that they have not been paying rent since the companies went bankrupt, but this has not been confirmed for all of them. However this does not absolve them from their obligations under the original contracts. The contracts they had with previous owners had an expiration date and if the companies were still operating, they would've been expected to continue paying rent until their lease contracts were terminated or they met the requirements for transfer of ownership.

It is worthwhile noting that these residents have been living in these accommodations for over 20 years (in some cases over 30 years) through continuous 5-year lease contracts and most of them do not have alternative housing options. Because of their status they would not be able to immediately receive ownership status for replacement housing, but under the Housing Law they are eligible to receive public housing to lease. Under the Housing Law, public housing is awarded based on the size of the household, with the option for reduced utility bills, and with rent reduced from the current market value with an option to request exclusion of the rent altogether depending on the socio-economic status of the household. This is ensured by allocating social housing rent free or providing subsidised rent if allocated housing is not publicly owned. The Law states that lease contracts are renewed annually, assessing the socio-economic status of the household at the time of renewal, allowing the households to stay in the allocated apartments until their socio-economic status changes, or they become owners of other real property.

Commercial

Based on the data presented above, one of the more notable characteristics shown is the prevalence of informal business owners, with the notable exception to this being Stanica Pančevački most, where the existing buildings are considered illegal. The 10 buildings at the location are of sturdy build and have

allegedly been there for over 20 years, and are visible on satellite photos from before 2015. However the documentation has indicated that none of these buildings had any form of construction permit. They are located right under the Pančevo bridge and next to the railway station. There had been submissions for legalisation in the past, however there are no legal grounds to allow these buildings to remain here. The administrative process to demolish these structures had been initiated prior to the Project but is currently paused. During the survey in May 2024 most of the buildings were closed off and seemed like they were not operational for a while. From the remaining markings several of these businesses were cafes and restaurants/fast food. There were two businesses still operational.

The largest impact on commercial properties is expected in locations for the stations Skadarlija and Trg Republike, with the temporary relocation of the “Bajloni” green market and the deconstruction of the “Staklenac” shopping mall.

The “Bajloni” green market, located at the bottom of the Skadarlija street is in the core of the City centre and is a landmark for the residents and tourists. It is an important commercial hub, with many vendors operating within the green market. The public utility company “Beogradske pijace” operates this green market along with over 30 other markets across the City. The stalls are assigned during the public bidding process and the lease duration is one year. After the annual lease expires the lease can opt to renew the lease contract, provided that they have paid off all outstanding costs, otherwise stalls go up for public bidding again. Subletting of stalls is also allowed. Around the green market there are over 20 individual business units/storefronts. The allocation of these units is similar to stalls, but these can also be leased directly if there is availability. After the annual lease expires, the current lease has the opportunity to renew the lease contract.

The reconstruction of the green market is a standalone project being implemented by the CoB as part of a wider programme to refurbish and modernise all of the City’s green markets. BMV and “Beogradske pijace” are coordinating their activities so that the metro station is constructed together with the market reconstruction project. The proposed solution for the green market during construction works is a temporary relocation of the market to the nearby public transport depo. The depo has a smaller area than the market so some of the stalls and locals are expected to be relocated to other green markets or terminated entirely. Once completed the green market reconstruction is expected to provide greater commercial capacity, as the reconstruction project includes adding a second above ground level, as well as underground parking area. The contracts with vendors are renewed annually and the expectation is that once the start of construction on the reconstruction of the market is determined the lease agreements will be reevaluated/discontinued.

Considering the above it is decided that the “Bajloni” green market is considered outside the scope of this RAP.

The shopping centre “Staklenac” was constructed in the late ‘90s with a temporary construction permit, issued for a period of 10 years. It was not initially intended to be a permanent structure, but considering that the area had no alternative purpose it was never torn down. There are 30 storefronts in the shopping mall, and during the surveys it was confirmed that the majority of the business units are leased out and operational. Even those that seemed vacant were confirmed to be leased out as storage for other business units in the building. The ground floor units are primarily leased by fast food operators, but inside and on the upper floors there are gaming cafes, photoshops, clothing stores etc. The owners of the locals were not contacted individually. Their ownership documentation was also issued on a temporary basis and is no longer valid. The RAP recognises the entitlement for compensation of the construction value for the owners. The loss of revenue from the businesses and income from lease is expected to be mitigated through timely notification, rather than compensation, due to the temporary nature of the building. Timely notification is planned to be one year prior to demolition, and financial compensation is only expected if the demolition starts prior to the one year deadline.

A similar situation but a much smaller impact is noted at the location of the station Park Banovo brdo. The owner was issued a temporary building permit to construct the café in what is essentially a public green park. The permit is issued without a time restriction, but rather with a caveat that the permit is valid until the publicly owned land is allocated a specific purpose (in this case, the metro station). The owner of the café was contacted for the survey but refused to participate. There is still a chance that the modification of the design could exclude this structure from expropriation, especially since it is not directly on the footprint of the station, but rather in the construction impact area. However if the building cannot avoid demolition, the

owner will be entitled to compensation in line with the entitlement matrix, including the timely notification of planned demolition well in advance.

5. Socio-economic profile of affected communities

Due to the complex nature of the City of Belgrade, reliance on secondary statistical data for the project affected area was considered unsuitable. The statistical data is limited to the level of individual Municipalities which have diverse and heterogenous social and economic structure. Instead, the socio-economic profile of the project affected area is based on the self-evaluation of the PAPs and the data collected in the surveys.

The interviewing took place in the period from 20 May till 7 June 2024 and was carried out using tailored questionnaires – one for the residential properties and another for commercial. The purpose of the surveys was to determine the socio-economic status of the project affected persons, their awareness of the Project based on previous stakeholder engagement and to confirm the desktop data collected to complete the RAP database. The questionnaires used in the surveys are included as Appendix A.

The survey of the households that are expected to be physically displaced included 64 participants (76.2% sample coverage). The survey of the businesses included only 5 businesses located specifically in the area of Shaft 10. One of the businesses was not operational at the time of the survey. Affected businesses in other locations were not interviewed individually due to the nature of their formal status, as described in Chapter 4 of the RAP.

Summary of the findings on the socio economic profile of the affected persons is presented below.

5.1 Key findings

Residential properties:

- The average household size is around 4 members. Single-member households are the most common (25%), followed by large households with 5 or more members (22%).
- Around 43.14% of respondents are retired, and a significant portion are unemployed.
- The majority of respondents prefer replacement property over cash compensation.
- 82.54% of respondents do not have any other residential structure or land they could use instead of the affected property.
- Concerns are primarily related to housing situation and sufficient time for relocation.

Commercial properties:

- Businesses are uncertain about relocating and express concerns about losing clients and employees.

General

- Awareness of the ongoing expropriation process is generally low, with 68.25% of respondents not being aware at all. Understanding of respondents' rights during expropriation is even lower, with 63.65% reporting that they have no knowledge of their rights.
- The majority of respondents (79.37%) support the Project, while 14.29% are against it, and 6.35% remain neutral.

5.2 Summary of Residential Survey Results

There were 64 participants in the survey, which represents 76.2% of total PAPs in this category. The reach was not 100% because five PAPs were unavailable for interviews during the surveying period – either refused to participate or were unable to be contacted as they do not reside at the location permanently. Among those interviewed, 80.95% are owners of the property subject to expropriation, and the remaining respondents were household members. The gender distribution of property owners is almost equal, with a

slight advantage in favour of female owners (57.14%).

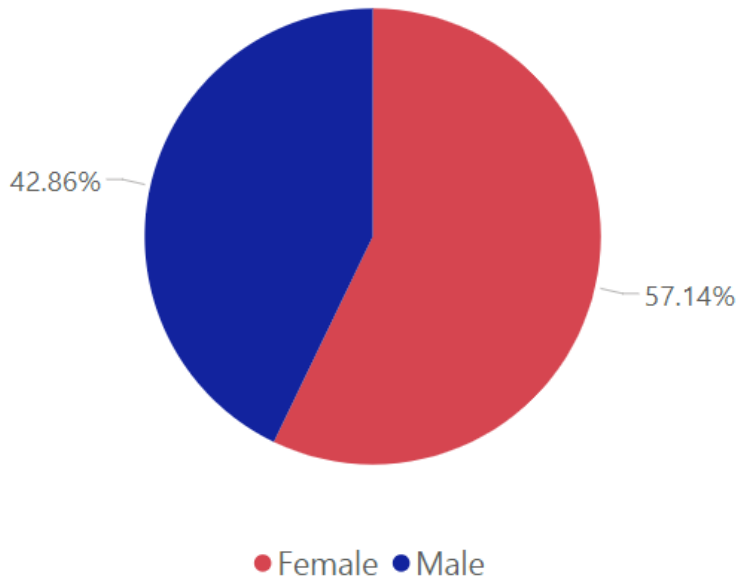


Figure 2 Gender Distribution of the Property Owners.

Around half of the owners (50.98%) are aged between 26 and 65, closely followed by those in the 66 to 80 age category (45.1%).

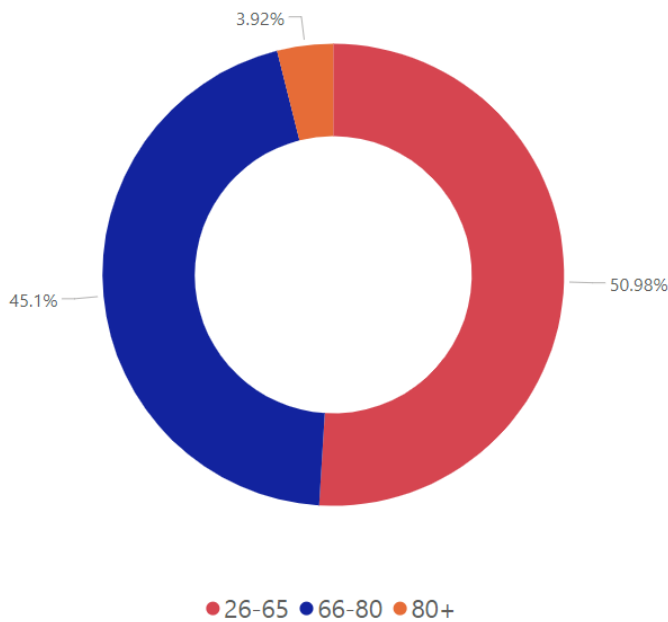


Figure 3 Age Distribution of the Property Owners

5.2.1 Household Structure

Among the surveyed households, there are approximately 240 members, with an average household size of around 4 members. The most common household size are single-member households (25%), closely followed by large households with 5 or more members (22%). The exact distribution of household size is shown in the Figure 4 below.

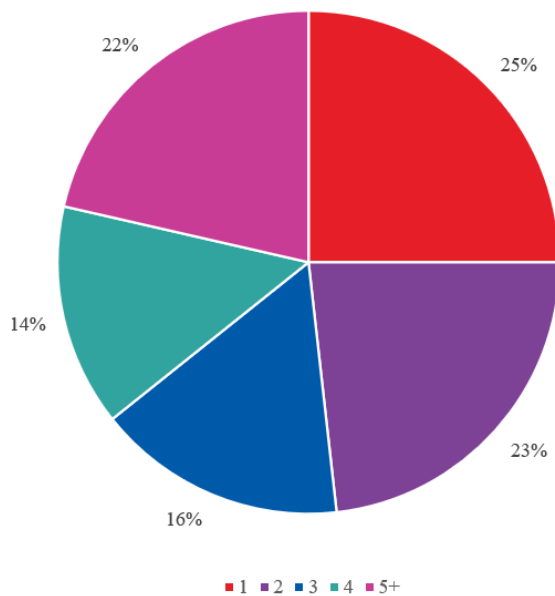


Figure 4 Surveyed Household Size

There are 14 single-member households, with more than half (8) considered elderly, meaning they are aged 65 and above. The significant proportion of elderly single-member households suggests a potential need for services targeted at elderly individuals living alone. On the contrary, out of 243 household members, only 19 are minors, which constitutes approximately 7.82%. This low figure indicates that the majority of households do not have their children living with them.

5.2.2 Education

The majority of household members have secondary education (50%), around 36% have higher education, and 14% have only elementary education. These figures align with data from the population census conducted in Belgrade, indicating no significant differences among the Project Affected Persons (PAPs).

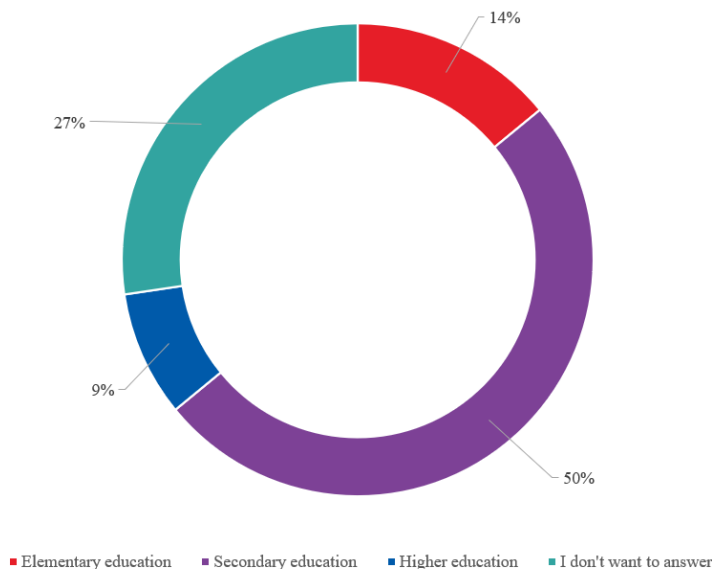


Figure 5 Educational Attainment of Household Members

The educational attainment of household owners aligns with the aforementioned findings, with 44.4% having secondary education and 12.7% having either elementary or higher education.

5.2.3 Income and Expenditure

In addition to basic demographic data, information on economic status of the households (occupation, income sources, sources of expenses) were gathered from the project affected persons. This information provides the implementation authorities with a general understanding of the communities affected by the Project, and the scope of compensation and resettlement assistance necessary to mitigate adverse effects.

Approximately 41.27% of respondents are retired, which is consistent with the fact that nearly half of them are aged 65 and above. Additionally, only 15.87% of respondents have permanent employment, 4.76% have temporary employment, and 19.05% are unemployed. Occupation of the head of the household is shown in the Figure 6 below.

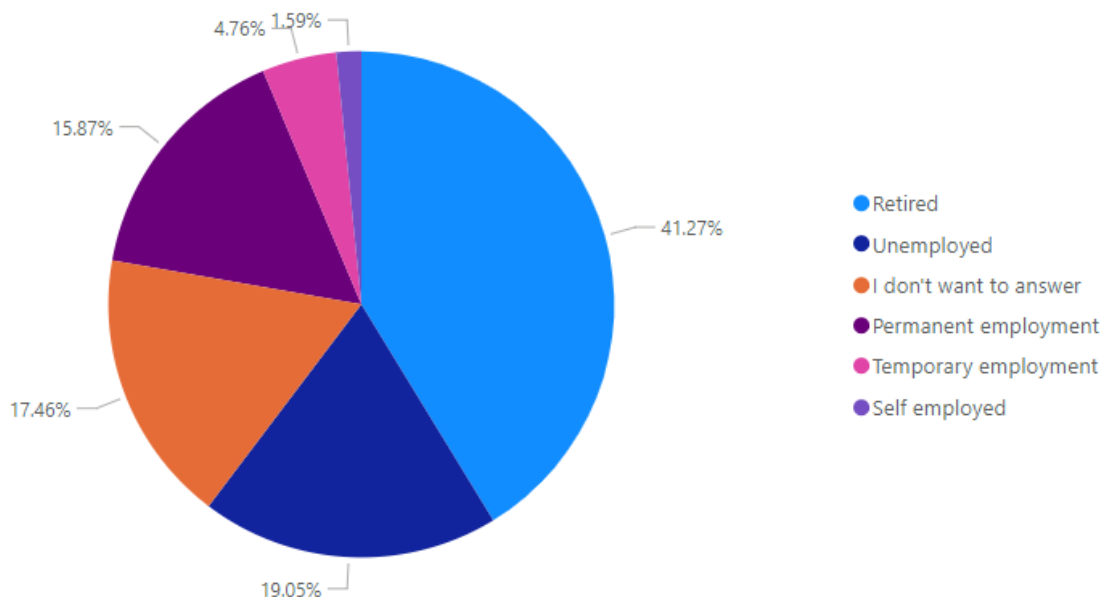


Figure 6 Occupation of the Head of the Household

Employed individuals cover a wide array of occupations spanning various sectors. These include service roles like waiters, transportation and logistics professionals such as boat drivers and delivery persons, technical experts like electricians and mechanical technicians, public safety personnel such as firefighters, administrative staff, professors in academia, professionals like economists, political scientists, and nutritionists, and salespersons and traders in commercial activities. Data on income sources includes information on all household members who have reported income. It is important to note that one household can have multiple incomes from the same source (e.g., salary). The most common income sources are pensions and salaries, each accounting for 46%. The remaining sources are distributed as follows: 6% of respondents receive child benefits, and one household receives welfare.

It is crucial to highlight that families reporting welfare and child benefits as their income sources have no other sources of income. These families are Roma families residing in the Shaft 10 area and have no formal employment. Families receiving child benefits have not been able to access welfare benefits, so the only potential additional source of income could come from selling collected raw materials. Unfortunately, this economic situation is common in the Republic of Serbia, and these families are considered economically vulnerable.

The respondents had the chance to self-assess their household's economic status. It is crucial to note that this is subjective and may not necessarily reflect an accurate representation. The majority of respondents (38.1%) consider their economic situation to be modest. Close behind, 30.16% of respondents perceive their households to be at risk of poverty, while 25.4% consider their economic situation to be average. Only one household perceives their economic situation to be above average.

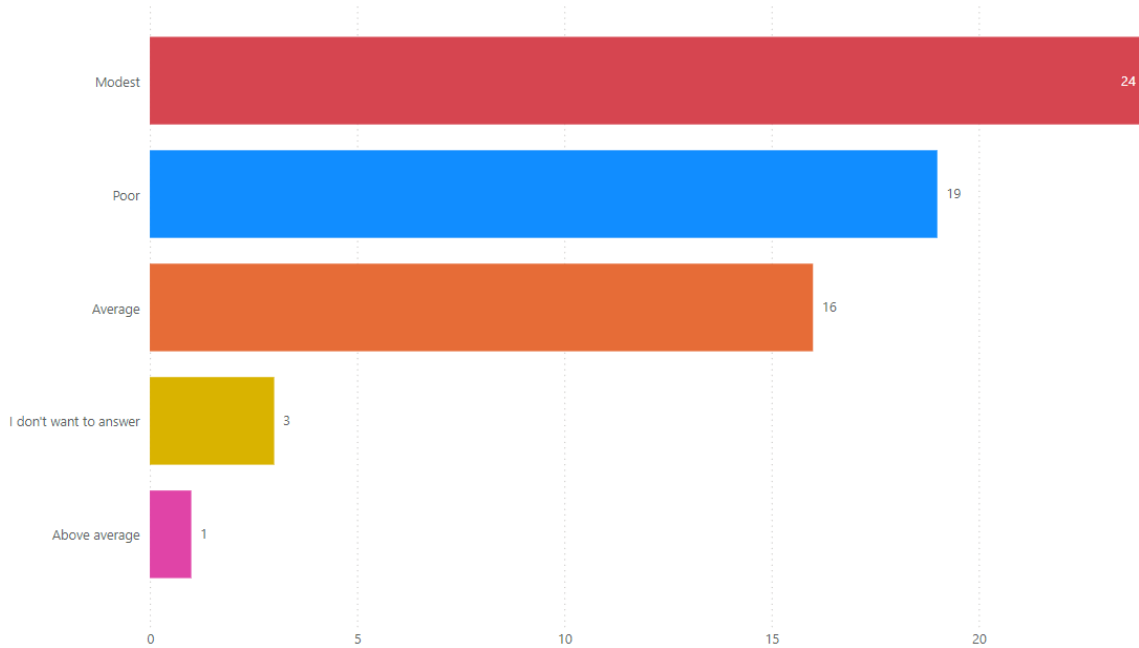


Figure 7 Self-assessment of Economic Status of the Household

More than half of the families reporting their households at risk of poverty also reported income from various sources, such as pensions and salaries. Overall, there was a negative sentiment towards questions aimed at determining household economic status, and respondents generally seemed unwilling to disclose their income. Therefore, this data may not necessarily be accurate.

The analysis of responses regarding main monthly expenditures indicates that the household expenditure structure is comparable to other areas of the Republic of Serbia. The most common expenditures are food and utility bills (such as electricity, heating, etc.), each accounting for 38%. Approximately 17% of respondents report expenses on medicine and medical treatments, which are typically more prevalent in older households. Other expenses include education (3%) and clothing (4%).

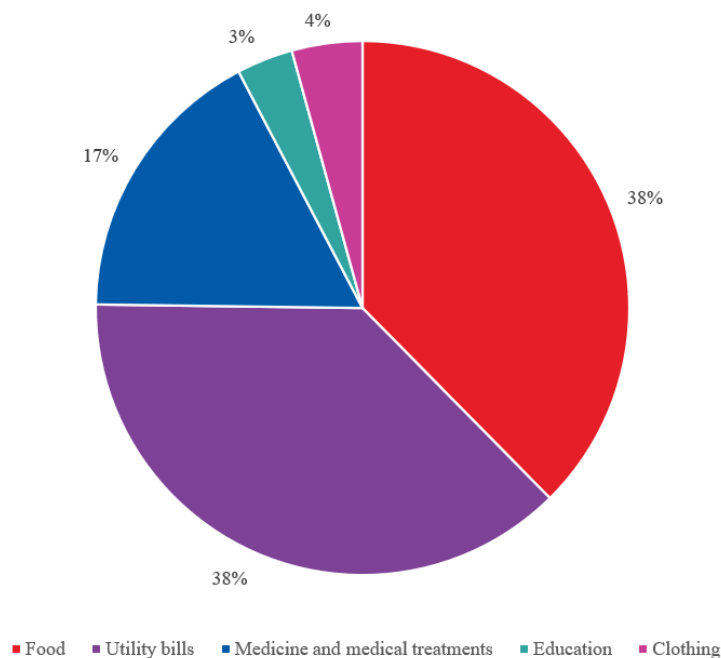


Figure 8 Main Monthly Expenditures

28.57% of respondents have loan obligations. The most common repayment period is under 3 years, with 42.115% of respondents. 21.5% of respondents have more than 5 years left to pay off their loans, and 21.05% have 3-5 years left.

26.98% of respondents own a transportation vehicle. However, it's important to highlight that all of these vehicles are passenger cars, small in size, and commonly used within the city. None of these vehicles are suitable for moving purposes, especially considering that furniture is bulky and requires ample space.

5.2.4 Affected Assets

Affected properties where the survey was conducted are located in Cadastral Municipalities of Cukarica and Palilula. The majority of respondents are located in the Cadastral Municipality of Palilula, specifically in the area of Shaft 10.

There are approximately 103 properties owned by the surveyed PAPs. The majority of properties are apartments (38.8%), followed by sheds (29.1%), houses (23.3%), garages (4.9%) and summer kitchens (4%). Approximately 30% of the affected properties are between 31-50 m², 24.7% are between 15-30 m², 18% are under 15 m², 16% are between 51-100 m² and 9% are between 100-200m². For the remaining objects, the owners were unaware of the surface area, but these are all auxiliary structures, like sheds, which have small surface areas.

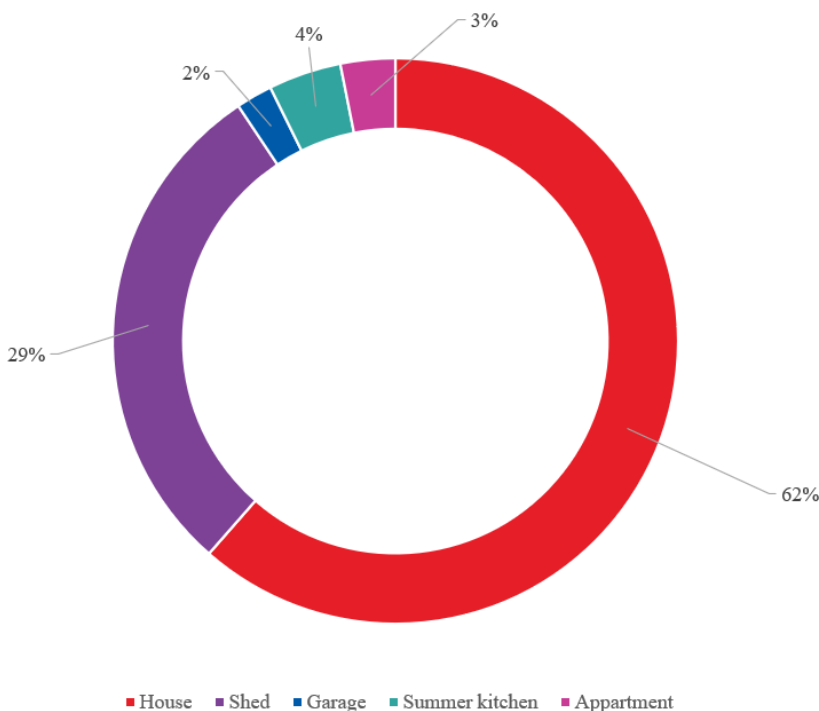


Figure 9 Type of Affected Property

Almost, 95% of properties were built using solid materials. The remaining 5% were all sheds constructed with other types of building materials, with the exception of one house. This house belongs to a Roma family.

Approximately, 73% of property ownership is informal. This is because the area around Shaft 10 used to be used as housing accommodation for the employees of two publicly owned factories. The companies owned the buildings and allocated accommodation for their workers. The employees had temporary usage agreements with these companies for their accommodation but never managed to obtain an ownership title. The companies have since gone bankrupt and the PAPs were left in a legal vacuum, unable to renew their contracts or obtain ownership titles. Despite this, all PAPs living in that area regularly pay their taxes and utility bills. Additionally, Majority of PAPs (90.48%) utilize affected properties as their permanent residence.

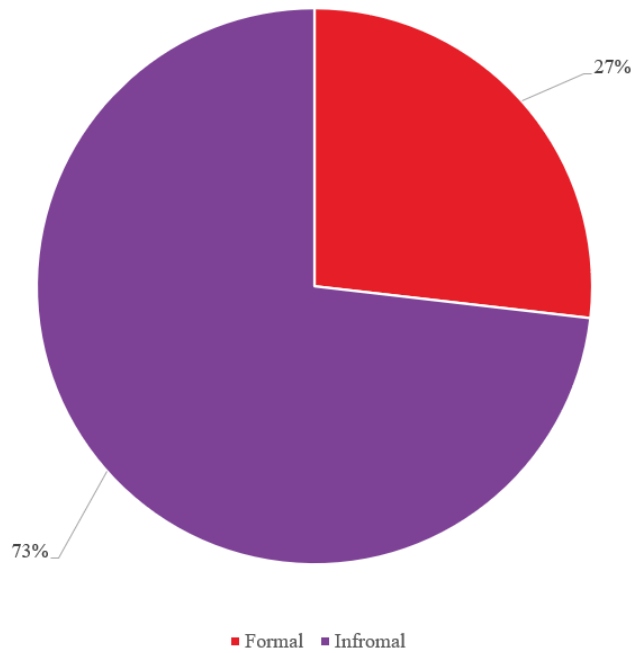


Figure 10 Distribution of Formal and Informal Property Ownership

Table 3 shows respondents' answers regarding the utility connections in the residential structures. The results show that majority of houses have equipped with basic facilities for permanent residence.

Table 3 Utility Connections in the Affected Residential Structures

Connection	Number of structures	Percentage
Electricity	54	91.53%
Hydrophore	4	6.78%
Kitchen	54	91.53%
Bathroom	52	88.14%
Septic tank	27	45.76%
Communal heating	17	28.81%
Communal sewage	26	44.07%
Communal water	25	42.37%

Table 4 shows respondents' answers regarding the utility connections in affected auxiliary structures. Data shows that very few of them are equipped with basic facilities. However, these answers are unsurprising considering that most of them are sheds, used for storage.

Table 4 Utility Connections in the Affected Auxiliary Structures

Connection	Number of structures	Percentage
Electricity	6	8.96%
Kitchen	5	7.46%
Bathroom	4	5.97%
Communal sewage	2	2.99%

Connection	Number of structures	Percentage
Communal heating	4	5.97%
Septic tank	4	5.97%

During the survey, respondents were asked about their preferences in compensation. They were given the option to choose between cash compensation or replacement property. The majority of respondents (76.27%) would prefer to receive replacement property instead of cash compensation. This is predominantly driven by increasing property prices in Belgrade and their concern that the compensation offered would not allow them to acquire property in the area they currently live. However, it also needs to be noted that respondents expressed caveats for the replacement property. A large majority, if not all, commented that they would not be accepting replacement property outside of the Municipality they currently live in.

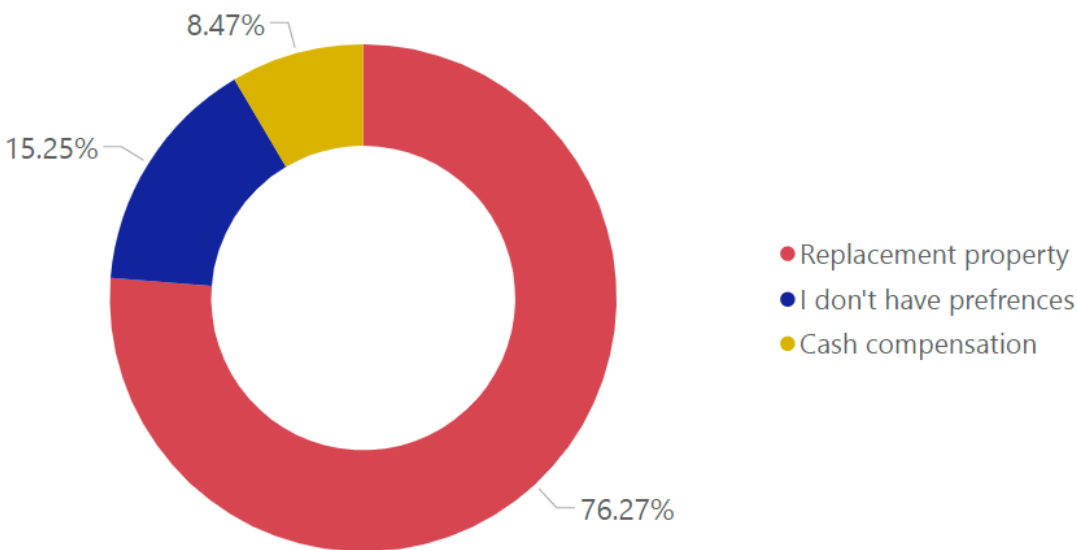


Figure 11 Compensation Preferences

Those respondents who indicated a preference for cash compensation are primarily individuals who have already purchased land and require monetary compensation to build residential structures on that land.

The reason why respondents opted for replacement property can be explained by the fact that 82.54% of respondents do not have any other residential structure or land that they could use instead of the affected property. These respondents are concerned about the impact the project will have on their housing situation and are generally worried that they will be left without housing options. Supporting this fact are the answers to the question regarding worries related to the project. 75.81% of respondents are worried about their housing situation, followed by concerns about whether they will be given enough time for relocation (4.84%). Detailed responses can be found in the Figure 12 below.

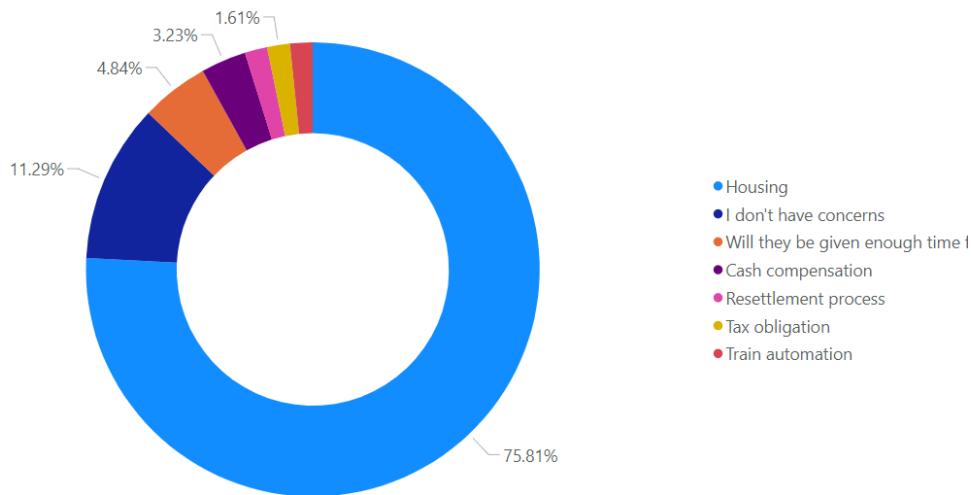


Figure 12 PAPs Concerns

5.3 Summary of Commercial Survey Results

There are 66 businesses, both formal and informal, within the project area. However as described in chapter 4 of the RAP the legality and formal status of the majority of these businesses were not included in the survey individually. Provisions have been included in the RAP to ensure that these businesses are compensated and consulted in line with the requirements of PR5.

The survey was conducted with five businesses, all situated in the Cadastral Municipality of Palilula, specifically in the area of Shaft 10. The detailed structure of the business is shown in the Table 5 below.

Table 5 Affected Business Structures

	Type of Business	Area of Business Structures	No. of workers that are not family members	Formal status of business ownership
1.	Reuse of sorted packaging material	>100m ²	6	Formal
2.	Reuse of sorted packaging material	>100m ²	11-50 ⁵	Formal
3.	Sale of construction materials	>100m ²	11-50	Formal
4.	Sale of construction materials	>100m ²	11-50	Formal
5.	Production	>100m ²	0	Formal

The structures occupied by these businesses were constructed using solid construction materials, and all have been operational since 1991-2000. Only one business has an alternative business premise that could be temporarily used instead of the current one. However, this business uses the other premise for cooperation with legal entities, while the one affected by the project is used for business with individuals.

All of the businesses are uncertain about where they could relocate their operations, and all expressed concerns about losing clients. This is because of potential delays in operations due to relocation, and one business is worried that employees may quit if they have to relocate to a location far from the current one. They believe that employees may be unwilling to commute long distances. Similarly, there is potential loss of business with individuals due to the distance between them and new business location. This can be

⁵ There are several reason for using ranges in the questionnaire, primarily due to seasonal workers being hired and discharged and the other being microbusiness with high turnover of employees.

explained by the fact that this business operates with sales of reused sorted materials and has established cooperation with local Roma community. Local Roma community earns significant amount of their income by selling reused sorted materials to local business such as this one. If business were to relocate to already existing premise they have, this would automatically mean the loss of business for them as well as Roma community.

Regarding compensation preferences, the businesses were split between cash compensation and substitute property. Similar to the findings of the residential survey, these preferences are also conditional. None of them are willing to relocate to a location far from the current one, citing reasons such as established clients and fear of losing employees.

5.4 Vulnerable groups and individuals

Vulnerable groups or individuals are those who due to their personal traits (age, gender identity, disability, medical condition, religion, ethnicity, indigenous status, economic disadvantage or social status, etc.) have lower capacity to cope with the Project-related risks and impacts and/or need assistance in practicing their rights and enjoying the benefits stemming from the Project.

During the socio-economic survey, the following vulnerable groups were identified in the Project area:

- **Elderly Households** - Almost half of the surveyed owners are older than 65. There are 7 households with one and two members, where all members are 65 or older.
- **Households with members that require special care** - There are 9 households that reported having a care-dependent member. In 8 households one household member requires special care, while in the remaining one household, two family members require special care. In 8 households, special care is required due to health conditions, and in one household, due to disability.
- **Single parent households** - There are 2 affected single-parent households in the Project area, each with dependent minors.
- **Ethnic minorities** - There are 5 Roma households affected by the Project. Two Roma families have income from pensions and salaries. The remaining three families are at risk of poverty, as none of them have any reported form of employment, permanent or temporary. Among these 5 families, 2 receive child benefits, and 1 receives welfare, leaving 2 families without any form of reported income.

Assistance to Vulnerable People

Actions identified in the Table 6 below will be offered to vulnerable persons and groups in addition to the entitlements already allocated to them based on the impact and status. The most appropriate assistance will be determined on a case-by-basis and in agreement with PAPs. Taking into account their specific needs, vulnerable PAPs will be provided with financial assistance, administrative assistance, assistance that requires physical labour. While most of the identified vulnerable people are among those being physically displaced, several are also economically displaced and the proposed support will be applicable to all.

Table 6 Assistance to Vulnerable Groups

Vulnerable Category	Support Methodology
Elderly (aged over 65 years)	<p>Transport assistance to attend public consultations and formal hearings during the expropriation process</p> <p>Assistance on acknowledging and signing official documents</p> <p>Access to legal resources. If needed, transportation to be made available as well.</p> <p>Assistance to access compensation payments (for example assistance with opening bank accounts)</p>
Disabled	<p>Transport assistance to attend public consultations and formal hearings during the expropriation process</p>

Vulnerable Category	Support Methodology
	<p>Assistance on acknowledging and signing official documents</p> <p>Access to legal resources. If needed, transportation to be made available as well.</p> <p>Assistance to access compensation payments</p>
Single parent households	<p>Temporary livelihood assistance if required</p> <p>Priority for job opportunities during the construction phase of the Project</p>
Roma	<p>Transport assistance to attend public consultations and formal hearings during the expropriation process</p> <p>Assistance on acknowledging and signing official documents</p> <p>Access to legal resources. If needed, transportation to be made available as well.</p> <p>Assistance to access compensation payments</p> <p>Priority for the job opportunities during the construction phase of the project</p>

6. Eligibility Framework and Entitlement Matrix

This chapter outlines the criteria and provisions for identifying and compensating affected individuals and communities. It further details the principles and procedures used to determine eligibility for various forms of assistance, ensuring that all project-impacted persons receive fair and adequate compensation and support. The Entitlement Matrix serves as a comprehensive guide, specifying the types of entitlements, such as financial compensation, housing, and livelihood restoration, tailored to different categories of affected persons.

The preliminary cut-off date for eligibility for compensation under the project was set at 20 May 2024, the first day of the field socio-economic survey or the RAP. The cut-off date serves as a deadline after which any transactions of ownership, improvements and additions to structures, trees, crops, and other immovable assets will no longer be counted or measured for compensation purposes.

A different formal cut-off date is adopted for different locations due to their status in the expropriation process. The main signifier of the cut off date for each location is considered the date of the notification of the owners that their property is included in the expropriation process. At that time, they are informed of the scope of impact on their property, their rights and obligations within the expropriation process and are informed that any changes to the ownership or condition of the property past that date will not be considered in the determination of compensation. For each location the cut off date will be considered as either:

- The date that the valuation of property is instigated
- The date that the Notification of expropriation is issued.

6.1 Eligibility Framework

Based on the assessment of potential impacts and the socio-economic assessment of the affected communities the following categories of PAPs are considered eligible for compensation under this RAP:

- Formal owners of any affected property;
- Recognized users of any affected property under the provisions of the laws of the Republic of Serbia
- Formal lessees of any affected property;
- Unregistered owners and informal users of affected agricultural or construction land;
- Unregistered owners and informal users of affected residential structures;
- Unregistered owners and informal users of affected commercial property;
- Owners of structures (auxiliary buildings, fences, wells, irrigation systems, etc.) affected by the Project, irrespective of the legal status;
- Owners of businesses registered or operating within the affected structures
- Employees of affected businesses
- Communities or households whose access to buildings, commonly held resources, and amenities are affected by the Project;
- Formal owners, lessees, or legal users under RS law, as well as unregistered owners and informal users of land and structures affected by the temporary occupation of land due to the Project;
- Vulnerable groups, including individuals below the poverty line according to national laws, women-led households, single parents, the elderly, disabled persons, or those with long-term health problems, discriminated ethnic minorities, who are affected by the Project;
- Individuals or entities whose losses cannot be determined or foreseen at this stage of the Project;

6.2 Types of Compensation

All compensation defined within this RAP can be grouped into four main categories:

- Monetary – various types of compensation based in cash payments which are determined using a pre-defined criteria.
- Replacement property – refers to replacement residential or business premises to be provided permanently (long term) or temporarily for affected households, using the predefined criteria and considering the preference of the PAPs
- Consultation – timely notification of planned activities to allow PAPs the time to make different arrangement. Applicable to various stages of the expropriation process, particularly regarding determining compensation, and later disclosing the construction start dates to ensure timely relocation.
- Assistance – administrative, legal or physical assistance to finalise the relocation process. Can include transportation of vulnerable groups to meetings related to the expropriation process; or legal aid to the Roma families with personal documentation, contract definitions, etc.

Valuation and compensation calculation as per national legislation

Compensation in kind is a method of compensation envisaged by the Serbian national legislation. This compensation is to be offered for all affected properties, if requested by PAPs to replace their property. However the beneficiaries of expropriation rarely identify sufficient replacement land or alternative housing at the start of the project to offer as compensation in kind. For this RAP it was determined that there is no available public land within the areas of impact that can be offered as in-kind compensation so all expropriated land will be compensated through cash compensation.

According to the legislation of the Republic of Serbia, the land price is determined by the tax authority. The municipal tax administration provides market value estimates for land subject to expropriation. These estimates are based on the prices recorded in private ownership transactions within the municipality or the area closest to the expropriated parcels.

Compensation for affected structures is determined through individual valuations by certified valuation experts engaged by Beoland. These experts assess the market value of the properties, ensuring the compensation amount is sufficient to rebuild the same structure in the same area. The assessment takes into consideration the areas and volumetry of the buildings, types of materials used, required labour costs and the quality of executed works. The valuation also considers the age of the property, and a depreciation rate is typically applied in the final assessment.

Similarly for improvements made to the leased property, individual valuations are made by certified valuation experts. The valuation includes the scope of investment, types of materials used, required labour costs and the quality of executed works.

Similarly for crops, valuations are made by certified agriculture or horticulture expert. This valuation considers the number or area of crops, confirms the age of perennial plants and determines the value of the crops based on the current market. Time required to regrow the perennial plant to the original size is also considered in the valuation, particularly for fruit bearing or nut trees.

The rent for the residences awarded through the Housing law are defined below the market value to make them suitable for the low socio-economic status of the occupants. The residences (usually apartments) are allocated based on the size of the household. The lease is renewed every five years and for as long as the socio-economic status of the tenants remains unchanged.

Methodology to determine additional financial compensation

The methodology for determining the amount of additional assistance encompasses several key components:

1. **Transitional Allowance for Residential PAPs:** A one-time cash compensation, equivalent to three months' worth of minimum salaries at the national level, calculated based on the month of payment. This allowance will be provided per household to aid in the transition period and is only applicable to households using the expropriated property as their primary residence at the time of valuation. Actual impacts on

livelihoods and finances are difficult to assess and providing a unified amount upfront allows the PAPs some contingency during the transitional period.

2. **Subsidies for rent for Residential PAPs:** PAPs who are entitled to temporary or long term lease of property will be allocated subsistence to cover one-year's rent in the allocated housing. For social housing this will be managed through the Housing law which allows rent-free use of social housing based on the socio-economic status of the households. For other housing arrangements the Beneficiary of Expropriation will pay out the subsidies directly to the property owners.

3. **Transitional Allowance for Commercial PAPs:**

A one-time cash compensation, equivalent to three months' worth of income based on actual evidence-based income at the time of valuation.

Or

Following transfer of ownership allow the businesses to continue operations for at least one year tax and rent free.

4. **Moving Costs:** Individuals will receive one-time cash compensation based on actual evidence-based costs incurred for equipment and labour used during the moving process. This ensures that individuals are adequately supported in covering the expenses associated with relocating their belongings.

5. **Costs of Equipment Relocation and Installation:** Like moving costs, affected individuals will receive one-time cash compensation based on actual evidence-based costs for both equipment relocation and installation. This assistance aims to alleviate financial burdens related to relocating and reinstalling essential equipment.

6. **Costs of Registration, Administrative, and Tax Fees:** Affected individuals will receive one-time cash compensation based on actual evidence-based costs incurred for registration, administrative, and tax fees. This support helps alleviate financial strain associated with legal and administrative processes.

7. **Loss of Income** – Unless the Project is able to provide the business with sufficient time (1 year) to relocate the business and reestablish the business in a new location, a one time cash compensation will be based on actual evidence-based loss of income for the period remaining until the full year and paid out to business owners and employees alike.

For the impacted business, the proposed methodology for Transitional allowance is based on the precondition that the businesses get sufficient notification significantly well in advance of the planned demolition. The cut off for the notification is going to be either (1) the transfer of ownership, following the signed Expropriation Decision or (2) Valuation report of the property.

By implementing this methodology, tailored and tangible assistance will be provided to individuals affected by relocation, ensuring a smoother transition and mitigating financial burdens during the resettlement process.

Livelihood Restoration

The Project necessitates the displacement of several families, resulting in the loss of their homes and potentially affecting their livelihoods, specifically the Roma families supporting their households from recycling and raw material collection. This chapter outlines the measures that will be employed to improve or restore the livelihoods of the displaced PAPs. Our objective is to ensure that the PAPs are not left worse off by the project and to provide them with the means to achieve sustainable livelihoods post-resettlement. Below we have compiled a list of possible remedial actions that can and should be taken to restore the livelihood of the PAPs.

BMV in cooperation with the National Employment Agency and the institutions for vocational training will work with the affected households to establish suitable programs to support PAPs in restoring or improving their income sources. These programs include:

- **Skills Training and Capacity Building:** Providing training in new skills that are in demand in the local job market to enhance employability. Providing equipment to assist their small business

- Job Placement Services: Assisting PAPs in finding new employment opportunities through job fairs, partnerships with local businesses, and employment agencies.
- Small Business Support: Offering grants, microloans, and business development services to PAPs who wish to start or expand small businesses.

Timely consultation

BMV will ensure that all PAPs are notified of the planned demolition of their property at least one year prior to start of any demolition.

BMV will ensure that the displaced PAPs receive compensation or replacement property at least two months prior to start of any demolition. In case the PAPs vacate the property before the allocated two months expire, BMV will obtain the confirmation from the household so that demolition can start as soon as the property is vacated. In case that possession of the property is required prior to compensation or replacement property is ensured, temporary housing or business premises of suitable size, structure and location, will be provided, as defined under article 16 of the Expropriation Law.

6.3 Entitlement matrix

For this project, the compensation provided to displaced PAPs whose homes will be relocated will be regarded as full replacement cost. To ensure clarity, within the entitlement matrix and throughout the subsequent sections of this document, the replacement cost will be defined as a combination of the current market value of the property and any additional costs incurred during the replacement process.

This approach ensures that the displaced individuals receive fair and comprehensive compensation that fully covers the value of their lost property, allowing them to secure similar housing without financial loss. The full replacement cost encompasses all necessary expenses associated with replacing the asset, ensuring that the affected person can restore their living conditions to a level at least equivalent to their pre-displacement state.

Specifically, this includes the market value of the property, the market value of any improvements, the labour and time required to install these improvements at market rates, moving costs, registration fees, administrative and tax fees, and a transitional allowance. By addressing all these factors, we aim to provide a holistic and equitable compensation package that supports the well-being and stability of the displaced individuals.

Type of loss	Entitled PAP	Compensation policy
Resettlement related losses and disruptions		
Loss of residential structure	Owner with a formal title	<p>Replacement structure of equal or higher value located in proximity or within the general vicinity of the expropriated property, including all resettlement costs (moving cost and transitional allowance) and administrative fees required for the transfer of ownership rights, if applicable.</p> <p>Alternatively,</p> <p>Cash compensation at replacement cost, which includes the market price of the property, , all resettlement costs (moving cost and transitional allowance) registration fees, administrative and tax fees, if applicable.</p>
	Individuals whose property claims are recognized or are recognizable under national laws (owners of structures constructed without proper licence on land with formal title).	<p>Replacement structure of equal or higher value located in proximity or within the general vicinity of the expropriated property, including all resettlement costs (moving cost and transitional allowance) and administrative fees</p>

		<p>required for the transfer of ownership rights, if applicable.</p> <p>Alternatively,</p> <p>Cash compensation at replacement cost, which includes the market price of the property, moving costs, registration fees, administrative and tax fees, and a transitional allowance.</p>
	<p>Lessee with valid indefinite lease documentation and Holders of tenancy rights as per the Housing law</p>	<p>Alternative housing arrangements with the same characteristic of the acquired property will be provided under similar conditions for unlimited duration based on the provisions of the law.</p> <p>+</p> <p>Compensation will be provided for all enhancements made to the structure in the period 5 years from Cut-off date. This compensation will be calculated at replacement cost, comprising the market price for improvements, the labour and time required for installing improvements at market rates, and any expenses related to relocating and installing equipment, if applicable.</p> <p>+</p> <p>Moving Cost and Transitional allowance</p>
	<p>PAPs without formal title, who were in possession of the structure prior to the cut-off date.</p> <p>(persons who are in the facility on the basis of lease/usership, but not in terms of the provisions of the Housing Law, persons whose lease contracts have expired, persons who are in residential facilities without a legal basis, as well as persons who are, at the time of expropriation, in dispute with the landlord for determining the basis of their title)</p>	<p>Alternative residential accommodation will be ensured by providing a residential building for use for an initial period of 5 years, with the option to extend in the event that the person initiates appropriate proceedings before the competent court to determine their right to the immovable property from which they were displaced. In that case, without concluding the annex to the contract on the use of the residential facility, the period of use of the alternative residential accommodation is extended until the date the court decision on their right to immovable property comes into effect. During the period of use of the residential building, only overhead costs will be paid (utilities) and no rent will be paid for use. After the court decision comes into effect, if the court makes a decision in favour of the informal owner, the compensation will be determined in accordance with the court decision and this Entitlement Matrix.</p> <p>Alternatively,</p> <p>Alternative housing arrangements will be provided based on the provisions of the Housing law, if so requested by the PAPs.</p> <p>+</p> <p>Compensation for all enhancements made to the structure in the period 5 years from Cut-off date will be provided at replacement cost, encompassing the market price for improvements, labour, and time required for installation at market rates, costs associated with</p>

		<p>equipment relocation and installation, if applicable, along with a transitional allowance.</p> <p>+Moving Cost and Transitional allowance</p>
<p>Loss of Business premises (shops, office buildings, workshops, warehouses etc.).</p>	<p>Owner with a formal title, including individuals whose land claims are recognized or are recognizable under national laws.</p>	<p>Cash compensation will be provided at replacement cost, incorporating the market value of the structure, expenses for relocating and reinstalling equipment and inventory (including moving costs), administrative fees for ownership transfer (if applicable).</p> <p>Alternatively, in accordance with legal conditions and upon the property owner's request, a replacement property at the same location or in the vicinity, with similar features to allow continued operations will be offered. Expenses for relocating and reinstalling equipment and inventory (including moving costs), as well as administrative fees for ownership transfer (if applicable) will be compensated.</p> <p>In either case, Transitional allowance as cash compensation will be paid out only if the notification period from transfer of ownership or valuation report is less than 1 year from the date of relocation.</p>
	<p>Owner without formal title</p>	<p>Cash compensation will be provided at construction cost, incorporating the market value of the materials and labour costs used in the construction of the buildings.</p> <p>+</p> <p>For business that were still operational at the time of the RAP survey, the owners will be entitled to compensation for moving costs and transitional allowance. Transitional allowance as cash compensation will be paid out only if the notification period from transfer of ownership or valuation report is less than 1 year from the date of relocation.</p>
	<p>Lessee with valid lease documentation.</p>	<p>Cash compensation will be provided at replacement costs, encompassing compensation for all improvements on the premises in the last 5 years (such as reconstruction, refurbishment, etc.), calculated at replacement cost (including materials, labour, and other necessary expenses to replicate the improvements elsewhere, if applicable). Additionally, it covers the costs of relocating and reinstalling equipment and inventory, including moving expenses, administrative fees required for ownership transfer (if any).</p> <p>If the premises were leased from the state, replacement premises for lease will be arranged if possible. Alternatively cash compensation will be provided at replacement cost, as defined under the previous paragraph.</p> <p>The business owners will be informed on their relocation at least one year in advance of relocation. Leases and their employees will also</p>

		be notified at least one year in advance. Only if the notification is made less than one year before relocation, will the businesses be eligible for loss of income as cash compensation.
	Business employees	<p>Employees will receive notification at least one year in advance of the planned closure or relocation of the business and the potential loss of income. Allowing them time to find alternative working arrangements.</p> <p>In case the Project construction activities require the business is closed before the one year period expires, a one-off time compensation for loss of income will be paid.</p>
Loss of land	Owner with a formal title	Cash compensation at replacement cost , which includes the market price of the land, the market value of any improvements, the labour and time required to install these improvements at market rates, registration fees, administrative and tax fees.
Loss of access to customary resources, amenities, community-held resources, and buildings.	Local communities	Revitalizing public property or services , such as roads, buildings of public interest, or similar infrastructure. Restoring access to conveniences or services to previous levels.
Impacts caused by temporary or partial occupancy of land and any damages to the property made during temporary occupancy	Property owners , including individuals with recognized or recognizable claims to land under national laws.	The compensation package includes the market price of the lease for the duration of the occupancy, and compensation for any damages to the property assessed at replacement cost, if the property is not returned to its original condition at the time prior to temporary occupancy.
Impact on vulnerable groups	Vulnerable PAPs , whose social status may expose them to more adverse effects from resettlement than others, or who may face limitations in their ability to claim or access resettlement assistance.	In addition to the rights outlined in this matrix, vulnerable Persons Affected by the Project (PAPs) will receive supplementary aid , including legal assistance and support during physical relocation, the nature of this aid is explained earlier, in section 5.4.

7. Stakeholder Engagement and Consultation

7.1 Summary of previous stakeholder engagement

The metro project has been in development for a great number of years and during that time numerous consultations and stakeholder engagement activities had been conducted. In addition to public disclosure of studies and planning documents, public agency Beoland initiated activities to engage with the local communities to identify affected property and their owners.

The first engagement with the affected households took place in 2022. Representatives of Beoland visited several key locations, focusing on those where physical resettlement is expected to take place. The purpose of these visits was to collect census data on the affected properties and identified owners and users. The representatives briefly announced the project to the PAPs who were there, and left notifications in the mailboxes for those who were absent to feel free to reach out to the Agency for additional information. In 2022 Beoland conducted these initial census visits at locations Shaft 2, Station Dunav, Shaft 9 and Shaft 10.

The process of administrative transfer and expropriation was initiated in February 2023 for Shaft 2. In the notification to the CM Cukarica about the start of the expropriation process, it was suggested that the Municipality arrange a public hearing. The hearing was held on 28 Mar 2023. The attendees were introduced to the project, provided with the maps showing locations of impact zones and expropriation lines. Attendees were also notified about the process of expropriation and invited to submit relevant documentation proving their ownership status, to supplement the data from the cadastre which has been proven lacking.

Over the course of April 2023 the Agency organised individual meetings with PAPs who submitted the documentation. By June 2023 it had proven necessary to engage expert witnesses to provide support identifying exact ownership of buildings or parts of buildings, as well as to determine which of the PAPs actually live at the location. This analysis was conducted between 18-20.08.2023. The report on the analysis was submitted to the Agency in September 2023. In November 2023 decision was made to initiate individual property valuation. This valuation begun in Apr 2024 and is currently ongoing.

Following the initial census visit in 2022, in February 2023 the Agency initiated the expropriation process starting from administrative transfers of publicly owned land. Over summer 2023 meetings were held with the PAPs living at the location as well as “Srbija Rail Infrastructure” who are the owners of the residential properties. During those meetings “Srbija Rail Infrastructure” was informed that they have to remove the building and provide the families with alternative housing. It was then disclosed that there is judicial procedure in process related to the housing arrangement between “Srbija Rail Infrastructure” and the PAPs.

For shafts 9 and 10 there was no further activity following the initial census surveys in 2022. Primarily because the exact boundaries of impact at this location are not yet determined and the Agency did not want to cause confusion and disturb the local population by informing them of expropriation that was not yet certain.

For the location Station Trgovacka, the Agency initiated the expropriation process through administrative transfers in February 2023. and in April 2023 suggested to the municipality to organise the public hearing with the PAPs whose house is to be removed. In person consultations took place in April and in May 2023 to establish who are the owners and the users of the building in question. In November 2023 the expert witnesses were invited to conduct the on site valuation of the property but there has been no progress to date.

The most recent engagement activity with the affected communities were the RAP surveys conducted over the period 20 May – 7 June 2024. PAPs were quite willing to participate in the survey, and in our opinion responded honestly to most questions contained in it. During the surveying we aimed to interview all PAPs targeted for resettlement, and were largely successful in that endeavour. PAPs who could not be contacted in person because they were either not living near or at the locations being expropriated, were contacted by phone.

During the interviews, PAPs expressed a great interest in permanent communications channels being established between them and BMV, which would be used to actively inform them on the current state and progress of the project, and to inform them in a timely manner on when works would begin, and when they would have to move from their current residences.

7.2 Approach to Stakeholder Engagement

As identified in the gap analysis, the requirements of the national legislation and the IFC Performance Standards require slightly different approach to stakeholder engagement. In order to comply with the IFC standards and ensure meaningful consultation with all stakeholders, a comprehensive Stakeholder Engagement Plan (SEP) has been developed for the Project and is being updated continuously. BMV is responsible for the development and effective implementation of the SEP. The successful execution of this Project is contingent on cultivating transparent relationships with stakeholders at the local, regional, and national levels. BMV is dedicated to collaborating closely with relevant municipal authorities and departments throughout the design and construction phases of the Project.

SEP will be updated to include provisions for meaningful consultations with the PAP affected by land acquisition and resettlement as per the guidelines provided below.

Public Disclosure of Information

As part of this engagement, BMV will establish a Project Notification Board and a Project Document Library on its website (<https://www.bgmetro.rs/index.php/en/>), providing access to essential documents, maps, and contact details. Regular updates will be posted, and the company will host at least one open-door day per month to address inquiries and provide additional information.

RAP is a publicly available document and is expected to be publicly disclosed for a period of 30 days prior to the public consultation meeting, and eventually adoption.

Documentation and information are expected to be regularly disclosed during the expropriation stage and especially as the Project approaches construction stage. This includes posters and leaflets at the affected businesses to notify the employees and the leaseholders of the planned demolition independently of the business owners, who will be informed through the formal expropriation process.

Consultation

To ensure effective communication and address concerns, BMV will conduct regular meetings and public gatherings during both the pre-construction and construction stages to present Project details and disclose relevant documentation. Continuous communication will be maintained through face-to-face interactions, media announcements, and community notice boards.

The initial step following the disclosure of the RAP would be to organise a public consultation meeting to introduce the RAP to the PAP and collect their feedback. As part of this consultation, pamphlets will be distributed to the PAP with easy-to-understand summary of the RAP and the entitlement included.

Following the RAP approval consultations continue during the expropriation process as well. The national expropriation process requires direct communication and consultation with the parties at various stages of the expropriation process.

- Expropriation decision, and the legally prescribed appeal process
- Reports on the Valuation of property, and the legally prescribed appeal process
- Compensation proposal, including allowance for clarification of information in the proposal or the judicial procedure if the compensation proposal is disputed

Records of these meetings are written up and signed off by all parties and are an integral part of the expropriation case for each of the PAPs.

In addition to these formally required consultations, BMV will conduct additional interviews with the PAPs at early stages of the RAP implementation to ensure that they are preparing for loss of residences and flagging any case where delays or issues could occur.

Feedback and Grievance Mechanism

To manage information dissemination, handle grievances, and oversee the Stakeholder Engagement Program, BMV will appoint designated Grievance and Community Communication Managers within the company. These managers will ensure that the SEP is effectively implemented and that stakeholder concerns are promptly addressed.

As BMV is the borrower of financial assets for the Project, they are the ultimate responsible body for the establishment of a grievance mechanism for the Project. Within the mechanism responsibilities for grievance management can be delegated to other agencies and entities, however the overall responsibility to establish and maintain a grievance mechanism lies with BMV.

It is expected that the Beoland Agency would take on the responsibility for addressing the grievances received related to the expropriation process and status. Beoland will be supported in this by the City Municipalities' representatives and will report to BMV on the status of received grievances and the process of resolution.

BMV is currently working to establish a grievance mechanism that fosters open communication, addresses community concerns effectively, and contributes to a more sustainable and inclusive project development process. As an independent consulting body, Arup is advising BMV on the matter. Based on previous project experience, these are some of the principles and practical measures we propose BMV integrates in their grievance mechanism:

Accessibility and Awareness:

- Multiple channels of communication – Providing various channels for submitting grievances, traditional grievance forms, but also hotlines, local community liaison officers, messaging apps and online platforms.
- Appropriate language: As a variety of people are eligible to use the grievance mechanism, with varying levels of understanding of legally formalistic language, all grievance material should be written in a clear and concise manner easily accessible to the general public.
- Awareness campaign: Inform the community about the grievance mechanism through public meetings, local media, and community leaders, informative material such as fliers, posters and such. Also consider delivering grievance instructions by post or in person.
- Ensure anonymity where possible: Many PAPs may be weary of submitting grievances in person or publicly, ensuring that grievances can be submitted anonymously whenever possible increases the likelihood of people actually engaging with the grievance mechanism. A good option would be to provide households with free grievance forms, which they can post in a designated letterbox without oversight.
- Develop a procedure for dealing with informal grievances: As the local culture is a rather informal one, most PAPs will freely complain to community communication officers, but will shrug formal paperwork and procedures. A separate evidentiary should be developed in order to note informal grievances communicated to BMV and Beoland staff.

Transparent, Clear and Fair Process:

- Clear procedures: Establish a well-defined process for grievance submission, investigation, and response, including timelines and responsible parties.
- Fair and objective investigation: Conduct a thorough and impartial investigation of each grievance, considering all relevant information and perspectives.
- Clear communication: Keep the complainant informed throughout the process, providing timely updates and explanations on the investigation and resolution steps. Engage a community communication officer, and task them with effectively communicating this to the relevant PAPs.

Effective Resolution and Follow-up:

- **Multiple resolution options:** Explore various options for resolving grievances, such as mediation, negotiation, or compensation, depending on the nature of the complaint.
- **Timely resolution:** Strive to resolve grievances efficiently and within a reasonable timeframe.
- **Lessons learned:** Document and analyse resolved grievances to identify potential areas for improvement in the project's design, operation, or community engagement efforts.

Independent Oversight:

- **Consider an independent body:** Explore the possibility of establishing an independent grievance committee or ombudsperson to oversee the mechanism, ensuring its impartiality and effectiveness.
- **Transparency and accountability:** Regularly communicate the grievance mechanism's effectiveness and address any identified concerns to maintain community trust and transparency.
- **Monitoring and registry of grievances:** Organize and maintain an internal monitoring process and a comprehensive system of filing and organizing a grievance registry, which will be accessible to the general public.

8. RAP implementation schedule

The first draft of the RAP shall be submitted to the Lenders for review and confirmation. Once confirmed, it will be publicly disclosed (in both Serbian and English) by BMV in the communities affected by the Project and on the BMV internet portal, as well as advertised in local newspapers. After the 30 day public disclosure period, BMV will arrange for public consultations with local communities and stakeholders. BMV will also issue a summary of the RAP information, enabling affected people to understand the compensation procedures and know what to expect at various stages of the project. The outcome of the public consultations shall be documented and included in the final RAP, which will then be sent to the Lenders for "no objection". Upon receiving the "no objection", if there are no material changes from the previously disclosed draft, the final RAP will be made available on the internet portals of BMV and the Lenders and remain there for the duration of the Project.

Implementation of the RAP is an obligation of BMV. BMV shall monitor the overall implementation, collaborate with the city municipalities where construction works and related activities are taking place, work with contractors, and disclose information to PAPs and communities.

The dates provided below are only indicative. Particularly with regards to RAP implementation actions there are wide ranges of implementation proposed as the activities are happening at different periods for different locations and City Municipalities.

Activity	Responsibility	Period	Status
Conduct survey of impacted PAP	Consultant	7 Jun 2024	Completed
Submitting draft RAP	Consultant	10 Jul 2024	Completed
RAP approval by BMV	BMV	15 Jul 2024	Ongoing
RAP approval by IESC and Lenders	IESC	7 Sep 2024	Not due yet
Public Disclosure of RAP	BMV	Sep 2024 (30 day disclosure period)	Not due yet
RAP approval – No Objection	Lenders	Oct 2024	Not due yet
Impact evaluation (external monitoring)	BMV/External Consultant	2026	Not due yet

As indicated in chapter 7.1 expropriation process was initiated for several locations within the CM Čukarica. The process has started with administrative transfers of public property. For private property valuation is completed for Stations 1 – 4 and ongoing for Shaft 2. The table below represents the status and indicative dates for the completion of stages in the expropriation process for each of the locations. The estimated dates for the start of construction are subject to change, pending negotiations with the Contractor.

The earliest start of construction is planned for December 2024. None of the locations included in this first stage of construction will result in physical displacement.

Location	Cut off date		Compensation proposals	Compensation payment	Completed displacement and assistance with relocation	Start of Construction
	Valuation of property	Expropriation Decisions				
Shaft 2	Apr 2024	In progress	Nov 2024 ⁶	Jan 2025	Feb 2025	Apr 2025
Station 5 Trgovačka	Apr 2024	In progress	Nov 2024	Jan 2025	Feb 2025	Apr 2025
Shaft 3	In progress	In progress	Nov 2024	Dec 2024	N/A	Dec 2024
Station 6 Požeška	Not started	Not started	Mar 2025	Apr 2025	May 2025	Jul 2025
Station 7 Banovo brdo	Not started	Not started	Nov 2024	Dec 2024	Dec 2024	Dec 2024
Shaft 4	Not started	Not started	Jun 2025	Jul 2025	Sep 2025	Sep 2025
Station 8 Ada Ciganlija	Not started	Not started	Jun 2025	Jul 2025	Sep 2025	Sep 2025
Shaft 5	Not started	Not started	Nov 2024	Dec 2024	N/A	Dec 2024
Shaft 6	Not started	Not started	Nov 2024	Dec 2024	N/A	Dec 2024
Station 9 Sajam	Not started	Not started	Feb 2025	Mar 2025	N/A	Apr 2025
Station 10 Mostar	Not started	Not started	Feb 2025	Mar 2025	N/A	Jun 2025
Shaft 7	Not started	Not started	Nov 2024	Dec 2024	N/A	Dec 2024
Station 11 Savski trg	Not started	Not started	Feb 2025	Mar 2025	N/A	Apr 2025
Shaft 8	Not started	Not started	Jul 2025	Sep 2025	N/A	Dec 2025
Station 12 Trg Republike	Not started	Not started	Dec 2025	Feb 2026	Mar 2026	May 2026
Station 13 Skadarlija	Not started	Not started	Jul 2026	Sep 2026	Oct 2026	Dec 2026
Station 14 Dunav	Not started	Not started	Feb 2025	Mar 2025	May 2025	Jun 2025
Shaft 9	Not started	Not started	May 2025	Jul 2025	Aug 2025	Oct 2025
Station 15 Pančevački most	Not started	Not started	May 2025	Jul 2025	Sep 2025	Sep 2025
Shaft 10 with TBM	Not started	Not started	Jul 2025	Sep 2025	Oct 2025	Dec 2025

⁶ Following adoption of the RAP and the Decisions of expropriation coming into effect

9. Monitoring and Evaluation

Efficient expropriation and resettlement depend on dedication and capacities of all institutions responsible for preparation and implementation of the process of displacement.

BMV will adopt a self monitoring process through which they will ensure compliance with the RAP.

BVM will develop and maintain a tracking database of resettlement and expropriation updated with all information about the affected persons and property (including their contact information), which would include all cases of expropriation and the stage of completion in the process of expropriation for each case (expropriation proposition submitted and/or signed, compensation offers prepared and/or delivered to PAPs, agreements regarding the compensation, compensation payment, additional assistance provided, grievances or initiated court procedures, etc.).

Internal Monitoring: The Belgrade metro and train have a team appointed to manage and oversee the expropriation and resettlement process. This team coordinates expropriation activities among government agencies, city municipalities, and ministries. The team will monitor the implementation of this RAP and keep records. The team will conduct targeted engagement with the resettled households (particularly those identified as vulnerable and highly impacted) in the early stages to track their ability to acquire suitable replacement residences or business properties.

External Monitoring: External monitoring will be used to help ensure the transparency and effectiveness of the resettlement and expropriation processes. This includes tracking the completion of administrative processes and the provision of entitlements to PAPs, based on review of the internal monitoring, and additional checks as required. Despite the lack of legal requirements for monitoring in Serbian expropriation law, these measures are introduced to align with international standards and project financing requirements, ensuring comprehensive monitoring and accountability.

A Completion Audit will be conducted by an independent third party consultant in line with the requirements of PS5, once the expropriation has reached a substantial level of completion. Any corrective actions identified in this Completion Audit must then be implemented and a follow-up audit conducted if required.

Monitoring indicators

Internal indicators will include BMV conducting internal periodical monitoring adjusted to the external reporting requirements of the lenders and the expropriation process stage. The internal monitoring will involve collecting key performance indicators (KPIs) to assess the land acquisition and resettlement process, including:

- Overall Spending on Land Acquisition: Tracking total expenditure on land acquisition activities.
- Cash Compensation: Amounts disbursed for cash compensations.
- Costs of Providing Assistance: Detailed costs by types of assistance provided.
- Costs of Evaluators and Surveyors: Expenses related to property evaluation and surveying activities.
- Costs of Legal Fees: Legal expenses incurred during the expropriation process.
- Costs of Taxes and Registration Fees: Fees paid for taxes and property registration.
- Costs of Consultancy Input: Payments made to consultants for their services.
- Other Costs: Any additional costs associated with the land acquisition process.
- Number of Employees and Consultants Involved: Tracking the human resources involved, including:
 - Members of the land acquisition team.
 - Members of other departments and institutions.

- Number of Public Discussions and Consultations on the RAP: Number of scheduled and held public consultations and discussions regarding RAP.
- RAP Disclosure: Ensuring the RAP is disclosed to all relevant stakeholders.
- Percentage of Purchased Land: Proportion of land purchased relative to the total land needed for the project
- Number of Completed Compensation Payments: Total number of compensation payments made.
- Number of Replacement Properties Given and Houses/Apartments Provided: Tracking the replacement properties and houses offered.
- Number and Amount of Payments for Loss of Income: Compensations provided for loss of income.
- Amount and Type of Assistance Provided to Vulnerable Groups: Assistance extended to vulnerable groups.
- Number and Type of Grievances: Details on grievances, including legal actions arising from expropriation.
 - Number of submitted cases.
 - Number of resolved cases.
 - Time needed for resolution.
 - Typical issues
- Number and Percentage of Persons who were provided with alternative housing
- Number and percentage of Persons who received cash compensation and acquired alternative housing themselves
- Number and Percentage of Persons with Improved Household Income: Evaluating the change in household income levels.
- Number and Percentage of Persons with Improved Housing Conditions: Assessing improvements in housing conditions post-resettlement.
- Number and Percentage of Persons with Increased Monthly Expenditure Level: Tracking changes in monthly expenditure levels.
- Number and Percentage of Persons with Improved Asset Ownership: Measuring changes in asset ownership.
- Number and Percentage of Persons Still Living Below Poverty Line: Applying the same criteria used to determine vulnerability initially to assess ongoing poverty status.

As far as external monitoring, it will involve reviewing the status of the RAP implementation and the effectiveness of the adopted mitigation measures, for physical relocation and for livelihood restoration.

Appendix A

A.1 Questionnaires used in the survey

Table 7 Questionnaire for owners of residential structures

Question Number	Question Text
1.	Name of the respondent
2.	Gender of the respondent
3.	Age of the respondent
4.	Phone number of the respondent
5.	Adress of the Respondent
6.	Municipality
7.	Is the respondent the owner of the property?
8.	If not, who is the owner of the property?
9.	How long has respondent been living on this address?
10.	What is the educational
11.	What is the educational attainment of the head of the household?
12.	What is the occupation of the head of the household?
13.	What is the employment status of the respondent?
14.	Is this temporary or permanent address?
15.	Are there any household members who require special care?
16.	For what reason is special care needed?
17.	How many members does your household have?
18.	What is the respondent's relationship to household member?
19.	What is the age of the household member?
20.	What is the educational attainment of the household member?
21.	What is the employment status of the household member?
22.	What is the occupation of the household member?
23.	How would the respondent rate the economic situations of its household?
24.	What is the income from salaries?
25.	What is the income from pension?
26.	What is the income from welfare?
27.	What is the income from child allowance?
28.	What is the income from leasing property?
29.	What is the income from foreign donations?

Question Number	Question Text
30.	What is the total income of the household?
31.	What are the main expenditures of the household?
32.	Does the household have functional vehicle that could be used for relocation purposes?
33.	Does the household have loan repayment obligation?
34.	What is the monthly instalment amount for the loan?
35.	What is the loan repayment period?
36.	How many properties does the household own?
37.	What is the total are of the property?
38.	What is the type of the property?
39.	Is the property formal or informal?
40.	What is the year of the construction/renovation of the property?
41.	What materials were used in construction of the property?
42.	What is the property equipped with?
43.	Are you aware of ongoing expropriation process?
44.	Are you aware of your rights in expropriation process?
45.	Do you have residential property or land that you could use instead of your current residence?
46.	Do you prefer monetary compensation of replacement property?
47.	How informed are you about the Project?
48.	What concerns you the most about the proposed metro project in your area?
49.	Generally, do you support or oppose the Project?

Table 8 Questionnaire for business owners

Question number	Question Text
1.	Full name of the respondent
2.	Gender of the respondent
3.	Age of the respondent
4.	Phone number of the respondent
5.	Adress of the respondent
6.	Municipality
7.	Is the respondent the owner of the business?
8.	What is the total land area of the business targeted for expropriation?
9.	When was the structure built/renovated?

Question number	Question Text
10.	When was the business founded?
11.	Which construction material was used during the construction of the structure?
12.	What sort of economic activity does the business engage in?
13.	Is the business formal or informal?
14.	How many permanent employees does the business have, that are not members of the owners?
15.	How many permanent employees does the business have, that are members of the owners household?
16.	How many temporary employees does the business have, that are not members of the owners household?
17.	How many temporary employees does the business have, that are members of the owners household?
18.	What is the net monthly income of the business?
19.	Do you think that the expropriation process will cause any of the following options (Loss of clients and business, loss of planned income, damage done to machinery and equipment, loss of property value, loss of employee income due to loss of business)?
20.	Do you have any other commercial structure in your ownership which you could use instead of the current one?
21.	Which form of compensation would you prefer?