

Vračević A Ivan
Attorney

By email only: anaroz.voj@gmail.com; vracevic86@gmail.com

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Dear Mr Vračević,

Thank you for contacting the European Bank for Reconstruction and Development (“EBRD” or the “Bank”).

EBRD’s commitment to good environmental and social practice is part of our mandate and reflected in the Bank’s Environmental and Social Policy (ESP).

The EBRD is fully aware of the situation at the Duboko Waste Management Centre, which is the Regional Waste Management Centre (RWMC) for the region comprising nine municipalities (the “Project”) under the Serbian Solid Waste Programme (the “Programme”), originally signed in 2021. The Project envisaged the upgrade of the Duboko Waste Management Centre through the development of leachate and landfill gas management systems, landfill stabilisation and expansion works. The Bank has not disbursed any funds for the Project since the Programme was signed, and none of the investments envisaged have been carried out to date.

The Project Summary Document (PSD) for the Programme¹ was last updated in November 2024 and acknowledges the fire and instability at the project site. Since that update, the Ministry of Environmental Protection (MoEP) has taken the decision to rehabilitate and remediate the Duboko site as a priority. Therefore, the initial due diligence carried out for the expansion of the Duboko site is no longer fit for purpose and the Bank’s financing is now focused on the rehabilitation and remediation. To this end, the Bank has initiated a new environmental and social due diligence (ESDD) based on the changed environmental and social risk profile and focused on the rehabilitation and remediation. The Bank will disclose the new Non-Technical Summary (NTS) and Stakeholder Engagement Plan (SEP) on its website once this due diligence is completed and before any remediation and rehabilitation works can start.

In relation to your specific questions and requests:

1. Concerns regarding stakeholder engagement

The updated ESDD is intended to ensure that the public consultation carried out is aligned with the Bank’s ESP. Affected communities will be provided with access to relevant information to allow them

¹ <https://www.ebrd.com/home/work-with-us/projects/psd/52642.html#env-and-soc-info>



to understand the proposed **European Bank for Reconstruction and Development** rehabilitation and remediation activities, potential environment and social impacts and the proposed mitigation measures. Stakeholder feedback will be sought and considered from all relevant stakeholders, including Udruženje građana “Da (Ne) Dišemo Duboko” Užice, in the development of the Project’s design for the rehabilitation and remediation of the landfill through the design-and-build contract currently being procured.

2. EBRD Environmental and Social Requirement (ESR) 10

Through the ESDD carried out prior to the Project approval, a SEP was produced in compliance with ESR 10. The SEP actions were linked to milestones of the original landfill expansion project. However, as the implementation of the original investment under the Project did not progress as initially anticipated, these milestones were not achieved, and the corresponding SEP actions were therefore not triggered. As described above, the ESDD for the original investment under the Project is now considered out-of-date and is being overhauled in the ongoing ESDD. The results of the ongoing ESDD will be reflected in the tender documentation as applicable.

3. Access to information

The NTS and the SEP will be disclosed once they are complete and in suitable time to be incorporated into the rehabilitation and remediation works.

The consultations carried out in recent years by Duboko RWMC relate to the meetings held in August 2024 and November 2024, as well as the environmental impact assessment (EIA) public hearing in May 2025, for the proposed facility for the storage, treatment and transshipment of municipal waste generated in Užice. No further stakeholder consultation was carried out in relation to the Bank’s requirements for the original Project as the SEP for the original Project was linked to the national EIA process for the landfill expansion, which was never initiated. As described previously, the use of proceeds and circumstances are now changed to the extent that new stakeholder engagement will be carried out for the remediation and rehabilitation project prior to advancing to the second stage of the EPC procurement process.

4. Changes following the May 2024 fire

The Bank considered the fire and its consequences to require new ESDD based on the changed environmental and social risk profile and on that basis the Bank is already acting on all the points raised in question 4.

5. Meaningful engagement

We agree that publication of information on a website does not constitute meaningful consultation. Due to the change in environmental and social risk profile, EBRD is carrying out a new ESDD which requires meaningful consultation in-line with the Bank’s ESP, which includes taking into consideration and incorporating stakeholder feedback into project design and mitigation measures as suitable. No stakeholder consultation was carried out for the original Project as the national EIA process was never initiated.

6. EBRD's own responsibility for monitoring compliance, and 7. Current procurement processes

The Bank agrees that meaningful stakeholder engagement, suitable access to information and E&S due diligence must be carried out before decisions are implemented. It should be noted that the procurement deadline referred to in your letter is the first part of a two-stage process.



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The new ESDD has been planned to ensure that E&S documentation and requirements, including the SEP, are available for inclusion in the second stage of the ongoing procurement processes. This is signalled to potential tenderers in the first stage of the procurement documentation.

8. IPAM and accountability

The Bank acknowledges that this correspondence has been brought to the attention of IPAM.

9. Protection from retaliation

As per the ESP, EBRD does not tolerate retaliation, such as threats, intimidation, harassment or violence against those who voice their opinion or opposition to an EBRD financed project or to the client. The SEP will account for any foreseeable risks of retaliation against stakeholders. If any such risk is identified, the client will also develop and implement policies prohibiting any form of retaliation within the client's control and develop effective measures to respond to retaliation risks and impacts.

IPAM is also committed to ensuring safe access to its processes and their approach to retaliation is clearly explained on their webpage: IPAM Website².

² [Independent Project Accountability Mechanism](#)