



Independent
Project
Accountability
Mechanism

Third Problem Solving Monitoring Report

Belgrade Solid Waste Public Private Partnership

EBRD Project Number 46758

Case 2021/01 (Request #2)

June 2025

The **Independent Project Accountability Mechanism (IPAM)** is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determined whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project.

For information about IPAM, please contact us at ipam@ebrd.com or visit the [IPAM webpage](#).

Contact information The Independent Project Accountability Mechanism (IPAM) European Bank for Reconstruction and Development Five Bank Street London E14 4BG Telephone: +44 (0)20 7338 6000 Email: ipam@ebrd.com	How to submit a complaint to the IPAM Concerns about the environmental and social performance of an EBRD Project can be submitted by email, post, or via the online form at: https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/submit-a-complaint.html
---	--

Contents

LIST OF ABBREVIATIONS	5
EXECUTIVE SUMMARY.....	6
1. BACKGROUND	7
1.1. Request	7
1.2. Project.....	7
2. PROBLEM SOLVING INITIATIVE.....	8
3. PROBLEM SOLVING MONITORING	8
3.1. Monitoring Activities	9
3.2. Status of Agreements' Implementation.....	9
4. CONCLUSION	11

Unless otherwise indicated, capitalised terms used in this report are those as set forth in the 2019 Project Accountability Policy.

Acknowledgements

The Independent Project Accountability Mechanism (IPAM) would like to thank the Requesters, their Representatives and Advisers, EBRD management, the Client, City of Belgrade, City of Šabac and Municipality of Vladimirci for their support, clarifications, and cooperation during the preparation of this report.

LIST OF ABBREVIATIONS

Abbreviation	Long Form
Board	the Board of Directors of the European Bank for Reconstruction and Development
Case	the consideration of a Request under the Project Accountability Policy following its registration
CAO	the Chief Accountability Officer of the EBRD, and IPAM head
Case Registry	the registry of Cases created in accordance with Section III, Paragraph 3.1 of the Project Accountability Policy, which can be found on the IPAM Webpage
CSO	Civil Society Organization
EBRD (or Bank)	the European Bank for Reconstruction and Development
ESP	the EBRD's Environmental and Social Policy in force at the time of Project approval
IPAM	the Independent Project Accountability Mechanism of the EBRD established as per the 2019 Project Accountability Policy
IPAM Head	the EBRD managing director responsible for the running of IPAM, the implementation of the Project Accountability Policy and for making the decisions that are the responsibility of IPAM under said Policy
PAP	the 2019 Project Accountability Policy
Parties	the individuals, entities, and/or organisations with a direct interest in a Case. Parties may include (but are not limited to): the Requesters; their Representatives, if any; the relevant Bank department, team, or unit; the Client; and other Project financiers or other entities responsible for the implementation of a Project
Problem Solving	the IPAM function which supports voluntary dispute resolution engagement between Requesters and Clients to resolve the environmental, social, and public disclosure issues raised in a Request, without attributing blame or fault.
PSD	Project Summary Document
President	the President of the EBRD
Request	The communication submitted by a Requester or the representative to IPAM under this Policy

EXECUTIVE SUMMARY

On 24 November 2020 the [Independent Project Accountability Mechanism](#) (IPAM) received a [Request](#) from five Roma households of waste pickers (Requesters) represented by A11 - Initiative for Economic and Social Rights (a Serbian CSO) and advised by CEE Bankwatch (an international network of CSOs). Requesters alleged that the [Belgrade Solid Waste PPP](#) (46758) caused them physical and economic displacement as they had to move from the Vinca landfill where they used to live and work. Requesters asked for their identities be kept confidential as a precautionary measure, due to concerns of potential intimidation, pressure, and reprisals and expressed interest in Problem Solving. During the Assessment stage 12 additional affected families that were relocated from the Vinca landfill joined the IPAM Case, making 17 households in total.

The Problem Solving Agreements were signed on the 4th and 5th of July 2023, when all Parties met in Belgrade and Vladimirici. The Case was transferred to the Problem-Solving Monitoring stage where IPAM oversees implementation of the Agreements and issue bi-annual reports on progress. This is the third monitoring report issued by IPAM and covers the period from July 2024 to May 2025. The previous two monitoring reports issued by IPAM are available in IPAM's virtual case registry at [Case 2021/01](#).

During the third monitoring period IPAM conducted two monitoring visits to Serbia in August and October 2024, engaged with Parties virtually and reviewed relevant documentation to support the implementation of Agreements. In addition, the IPAM's local monitor conducted regular monthly visits to Requesters houses, provided additional assistance in accessing social services, as well as reviewing education and income generation opportunities.

IPAM confirmed that all Requesters have access to social benefits, can access free meals, are registered with the National Employment Service, and can access emergency financial support when needed. All eligible Requesters have been informed by the IPAM Local Monitor about the adult education and vocational trainings opportunities and have been offered support to enrol, however, to date, no Requesters showed interest. All Requesters from Šabac and three Requesters from Belgrade are formally employed, while the others have opted for informal employment as they prefer to continue being eligible for social assistance.

IPAM ensured that all utility debts and enforcers' fees accrued by Belgrade Requesters until the cut-off date, (December 2022) were covered as agreed in the Problem-Solving Agreement. However, new enforcers' fees debts appeared in Requesters' bills. This issue has been partially resolved; three out of eight Requesters received letters from Infostan confirming that the debt related to enforcers fees would be written off.

Requesters from Šabac are covering the utility bills regularly as well as one family from Belgrade this allows them to access subsidised costs. The five Requesters from Vladimirici have started being presented with utility bills as of May 2025 and are expected to cover those costs as per the housing agreements signed with Vladimirici municipality when they moved into the houses in May 2023. Finally, in September 2024, one Requester from Belgrade who became eligible for social housing was allocated a social apartment by the City of Belgrade and moved in.

For this monitoring period, the Parties had committed to implement 19 actions. As reported here, 17 have been completed and two remain pending. The protracted transition process in local governments has been the main challenge for the timely implementation of some of the agreed actions. The monitoring plan agreed with Parties when the Problem-Solving Agreements were signed indicated the end of December 2024 as the deadline for completing all agreed actions. Considering the pending actions, IPAM consulted with Parties and at their request agreed to continue monitoring the implementation of the Agreements while jointly looking for practical ways in resolving the pending actions.

This report was shared with the Parties for comments prior to its disclosure and is submitted for information to the EBRD Board of Directors and the President. The report is then publicly available in the virtual case file [Case 2021/01](#) in both English and Serbian. The fourth Problem Solving Monitoring Report will cover the period from June to December 2025 and is expected to be issued in January 2026.

1. BACKGROUND

1.1. REQUEST



Waste picker at Vinca landfill before remediation. Source: Beo Čista Energija

The Request was submitted to IPAM on 24 November 2020 by five families of Roma waste pickers represented by A11 - Initiative for Economic and Social Rights (a Serbian CSO) and advised by CEE Bankwatch (an international network of CSOs).

Requesters alleged that the [Belgrade Solid Waste PPP](#) (46758) caused them physical and economic displacement as they had to move from the Vinca landfill where they used to live and work. During the Assessment stage 12 additional affected families that were relocated

from the Vinca landfill joined the IPAM Case, making 17 households in total. Requesters expressed that they received no temporary housing, or for some of them the housing that was offered wasn't adequate, and they were unable to pay utility costs. In addition, Requesters claimed that lost personal property during the resettlement process. They also expressed that the resettlement process has not complied with the local legislation of Serbia and the EBRD's Environmental and Social Policy. Requesters asked for their identities be kept confidential as a precautionary measure, due to concerns of potential intimidation, pressure, and reprisals and expressed interest in Problem Solving.

1.2. PROJECT

The [Belgrade Solid Waste PPP](#) (46758) involves debt financing in an amount of up to EUR 70 million to Beo Čista Energija d.o.o Beograd who is in charge of the construction of new sanitary landfills, an energy-from-waste facility for thermal treatment of solid municipal waste and production of electricity and heat for the residents of Belgrade. The Project also envisages the construction of a landfill gas facility which utilizes landfill gas for energy production, a leachate collection system and a leachate treatment facility, and construction and demolition of a waste recovery facility. The Project is also receiving support from the International Finance Corporation in the amount of up to EUR 70 million.



Vinca landfill leachate treatment plant. Source: Beo Čista Energija

The existing Vinca landfill was one of the largest non-sanitary landfills in Europe which has been operating since 1977, spreading over 45ha and reaching 80m in height. Through the Project the landfill is being stabilized remediated, and covered, thus preventing landfill gas pollution and leachate generation, and polluting the surrounding soil.

Under the Project's Public Private Partnership, the City of Belgrade is responsible for carrying out land acquisition and resettlement. In this regard, in 2018 the City of Belgrade prepared a Resettlement Action Plan in line with the EBRD's Environmental and Social Performance Requirements 5. The families who used

to live on the dumpsite in makeshift houses had to be relocated to Belgrade, Šabac and Vladimirici during December 2018 – January 2019. Considering that waste pickers were expected to lose their income, livelihood restoration measures have been provided in the Resettlement Action Plan. The Project was approved for financing by the EBRD Board of Directors on 18 September 2019, as Category A under the EBRD's 2014 Environment and Social Policy. The loan is currently being repaid by the Client.

2. PROBLEM SOLVING INITIATIVE

From May 2021 to July 2023 IPAM facilitated a [mediation process](#) between Requesters, their Representatives (A11 Initiative), Advisors (CEE Bankwatch), Beo Čista Energija d.o.o Beograd (the EBRD Client), the City of Belgrade, the Municipality of Vladimirici and the City of Šabac.

The Problem-Solving Agreements were signed on the 4th and 5th of July 2023, when all Parties met in Belgrade and Vladimirici. Through the agreement, the 17 resettled families were guaranteed affordable social housing. In addition, they were offered access to specialized training and have been offered job opportunities. The process has sought to ensure that they can access social benefits and healthcare services as per their entitlements. Each family received furniture and house appliances and self-employed Requesters were offered tools and equipment.

The major concerns raised in the Request were addressed during the Problem Solving initiative (please see [Case 2021/01 Problem Solving Summary](#)). However, as some actions required more time for its full implementation (particularly those related to livelihood restoration) the Agreements provided an estimated timetable for their fulfilment. The Parties agreed for IPAM to monitor the Agreements' implementation.

After the signing of the Agreements in July 2023, the Case 2021/01 was transferred to the Problem-Solving Monitoring stage for IPAM to monitor the implementation of the Agreements reached by Parties as per an agreed Monitoring Plan.

3. PROBLEM SOLVING MONITORING

As per paragraph 2.5 a) of the Project Accountability Policy, IPAM will monitor the implementation of any agreements reached by Parties through Problem Solving and will determine their completion when they fulfil the following criteria:

- The commitments made by the Parties in such agreements are being effectively carried out; and
- Implementation timetables are being met.

Regarding the monitoring approach, the Project Accountability Policy specifies that in its monitoring activities, IPAM will:

- Consult with the Requesters, the Client, Bank management and other relevant stakeholders.
- Consider Project documentation, documentation submitted by the Requesters (or their Representatives, if any), the Client and publicly available information.
- Undertake a site visit to the Project area, if deemed necessary by IPAM; and
- Engage consultants on specific technical matters, if deemed necessary by IPAM.

IPAM will issue bi-annual Monitoring Reports to describe on-going monitoring activities and to provide updates on the status of each Problem-Solving agreement implementation, until IPAM determines that full implementation has been reached.

3.1. MONITORING ACTIVITIES

The third monitoring report covers the period from July 2024 to May 2025. During this period IPAM undertook the following activities:

- Engagement with the Parties in virtual meetings and via email to seek inputs on progress made in the implementation of the Problem-Solving Agreements;
- Two monitoring visits by IPAM staff to Serbia in August and October 2024;
- Monthly visits to Requesters' houses by the IPAM local monitor during 2024; and
- Review of documentation shared by Parties.

During the third monitoring period IPAM conducted two monitoring visits to Serbia in August and October 2024, engaged with Parties virtually and reviewed relevant documentation to support the implementation of Agreements. In addition, during 2024 the IPAM's local monitor conducted regular monthly visits to Requesters houses, provided additional assistance in accessing social services, as well as reviewing education and income generation opportunities.

IPAM confirmed that all Requesters have access to social benefits, can access free meals, are registered with the National Employment Service, and can access emergency financial support when needed. All eligible Requesters have been informed by the IPAM Local Monitor about the adult education and vocational trainings opportunities and have been offered support to enrol, however, to date, no Requesters showed interest.

IPAM ensured that all utility debts and enforcers' fees accrued by Belgrade Requesters until the cut-off date, (December 2022) were covered as agreed in the Problem-Solving Agreement. However, new enforcers' fees debts appeared in Requesters' bills. This issue has been partially resolved; three out of eight Requesters received letters from Infostan confirming that the debt related to enforcers fees would be written off.

Requesters from Šabac are covering the utility bills regularly as well as one family from Belgrade which allows them to access subsidised costs. The five Requesters from Vladimirci have started being presented with utility bills as of May 2025 and are expected to cover those costs as per the housing agreements signed with Vladimirci municipality when they moved into the houses in May 2023. Finally, in September 2024, one Requester from Belgrade who became eligible for social housing was allocated a social apartment by the City of Belgrade and moved in.

3.2. STATUS OF AGREEMENTS' IMPLEMENTATION

As per the agreed Monitoring plan, **19 actions were due to be completed in Belgrade, Vladimirci and Šabac during this monitoring period; 17 actions have been completed and 2 remain pending.**

Belgrade

Two outstanding actions due in June 2024 were not completed on time and have been carried over to this monitoring period, making a total of six actions due for completion. During this monitoring period, five actions have been successfully completed and one remains pending.

Access to social services - IPAM confirmed through the work of the Local Monitor that all eligible Requesters can access their social benefits. **This action is now completed and closed.**

Access to free meals - During regular monthly visits to families, the Local Monitor was informed that the Requesters are aware that they can access free meals but are not taking advantage of it. **This action is now completed and closed.**

Jobs and income opportunities - Since the signing of the Agreement in July 2023, three Requesters had accepted formal jobs. During this reporting period, the Client has continued to offer employment opportunities to Requesters at the Vinca landfill. In addition, at the request of IPAM, the City of Belgrade, confirmed jobs

availability at the Belgrade public utility company and in August 2024, the National Employment Service sent formal invitations to all Requesters. IPAM engaged with all Requesters able to work who haven't accepted formal employment. They shared that prefer informal employment, as it allows them to remain eligible for social assistance. **This action is now completed and closed.**

Enforcers' fees for utility debts – All utility debts for the period December 2018 to December 2022 have been paid and properly registered. **This action has been completed and closed in June 2024.**

Some Requesters' utility bills appear to be in arrears for two reasons:

- Incorrect charging of enforcement fees. IPAM has tried engaging with relevant service providers to correct this. However, IPAM was able to confirm that only three out of eight families received Infostan letters stating that enforcers' fees were written off.
- Most households have not been paying utilities and this made them ineligible for reduced utility costs.

This action couldn't be fully completed due to the unresponsiveness of Infostan and the fact that the Requesters have not paid all bills since their utility debts were covered in early 2023. This makes it challenging to determine which amounts were subject to nonpayment penalties, debts rates, and public enforcers' fees. **This action is pending.**

Monthly visits to Requesters – This was a responsibility that the City of Belgrade adopted in the Agreement which has not been fulfilled. The Local Monitor hired by IPAM has taken over this responsibility and has been visiting the households monthly during 2024. **This action is now completed and closed.**

Vladimirci

Two outstanding actions due in June 2024 were not completed and have been carried over to this monitoring period, making a total of eight actions scheduled for completion. During this motoring period, seven actions have been successfully completed and one remains outstanding.

Sustainable housing – In May 2023 the five families resettled to Vladimirci moved to the newly built houses. External porches have been built on four out of five houses to allow for sufficient living space. However, the porches have not been closed as agreed due to a contractual dispute. IPAM engaged with all relevant Parties to determine if the porches could be closed, but with no success. The response that IPAM got was a reference to the Serbian housing law, which considers the porch area as living space, regardless of whether it is enclosed, or not. **This action couldn't be completed.**

Access to social services - IPAM confirmed through the Local Monitor that all eligible Requesters can access social benefits. **This action is now completed and closed.**

Access to free meals - During regular monthly visits to families, IPAM Local Monitor was informed that the Requesters can access free meals and are taking advantage of it. **This action is now completed and closed.**

Access to utilities and payments – the five families living in the nelly bult houses started receiving utility bills for water and electricity as of May 2025 and are expected to cover the costs as per the housing agreements they signed with Vladimirci Municipality when they moved into the houses in May 2023. **This action was completed and closed.**

Jobs and income opportunities - Requesters informed IPAM Local Monitor that they are engaged in seasonal and informal jobs, and that they are not interested in formal employment, as this would make them ineligible for social benefits. **This action is now completed and closed.**

Monthly visits to Requesters' houses - This was a responsibility that the Municipality of Vladimirci adopted in the Agreements which has not been fulfilled. The Local Monitor hired by IPAM has taken over this responsibility and has been visiting the households monthly during 2024. **This action is now completed and closed.**

Šabac

All five actions due for this period have been completed. IPAM received a progress report from the City of Šabac, who has consistently shown commitment and capacity to implement the agreed actions. In addition, the Requesters are comfortable contacting them when needed. All Requesters from Šabac are employed. Some Requesters are formally employed at the regional landfill and the Šabac Public Utility company. They earn monthly incomes at the minimum wage level and have their travel expenses reimbursed. Other Requesters sustain themselves through informal day labour.

Access to utilities and payments – All three families in Šabac have accumulated electricity debts and are currently repaying these through monthly instalments. To alleviate this financial burden, the City of Šabac is offering one-time financial assistance to help the families settle their outstanding debts. **This action is now completed and closed.**

Access to social services - All Requesters can access social benefits and emergency financial assistance. **This action is now completed and closed.**

Access to free meals - Requesters can access free meals which are being delivered to their home address. **This action is now completed and closed.**

Monthly visits to Requesters' houses - The City of Šabac has been in constant communication with Requesters providing support and addressing social concerns as per their competences. **This action is now completed and closed.**

4. CONCLUSION

During this period, the parties have successfully implemented 17 out of 19 actions. The monitoring plan agreed with Parties at the time when the Problem-Solving Agreements were signed indicated the end of December 2024 as the deadline for completing all agreed actions. Considering the pending actions, IPAM consulted with Parties and at their request agreed to continue monitoring the implementation of the Agreements during 2025 while jointly looking for practical ways in resolving the pending actions.

This report will be disclosed in the IPAM case registry under web file [Case 2021/01](#) in both English and Serbian, after submitting it to the EBRD Board of Directors and the President for information. The fourth Problem Solving Monitoring Report will cover the period from June – December 2025 and is expected to be issued in January 2026.