
Belgrade – Niš Railway Modernisation Project

Technical Assistance to the Project Implementation Unit (PIU)

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PUBLIC CONSULTATION REPORT

“Reconstruction and modernization of the railway line Belgrade – Niš, Serbia”

April, 2026.

Contents

1. Introduction	4
2. Stakeholder engagement requirements.....	7
2.1. National legal framework	7
2.2. Lenders' requirements	7
2.3. Integration into the Project SEP.....	9
3. Summary of ESIA Documents disclosure and consultation activities	10
3.1. Public disclosure process	10
3.2. Public Consultations and focus group meetings.....	11
3.2.1. First round of public consultations (8–12 September 2025).....	13
3.2.2. Second round of public consultations (22 September – 2 October 2025)	15
3.2.3. Focus groups – vulnerable groups and NGOs (9–17 October 2025)	17
3.2.4. Additional round of public consultations (5–6 November 2025).....	21
4. Summary of stakeholder feedback and SRI response.....	24
4.1. Methodology for data collection and documentation	24
4.2. Summary of stakeholder feedback	24
4.2.1. Key themes emerging across public consultations and focus groups.....	24
4.2.2. Summary of written grievances/inquiries received during ESIA disclosure	28
4.3. Response of SRI to community concerns	33
5. Conclusions and next steps.....	36



List of Tables

Table 1 – Municipalities and settlements located along Section 3	5
Table 2 – First round of public consultations	14
Table 3 – Second round of public consultations	15
Table 4 – Focus groups – vulnerable groups and NGOs	18
Table 5 – Additional round of public consultations	21
Table 6 – Summary of grievances/inquiries received during the ESIA disclosure period	29

List of Annexes

Annex 1 - Proof of disclosure
Annex 2 - Copies of all invitation letters
Annex 3 - List of public meetings/focus groups participants (<i>not for public disclosure</i>)
Annex 4 - Minutes of meetings
Annex 5 - Proof of invitations to public consultations
Annex 6 - Grievance/Inquiry log table (<i>not for public disclosure</i>)

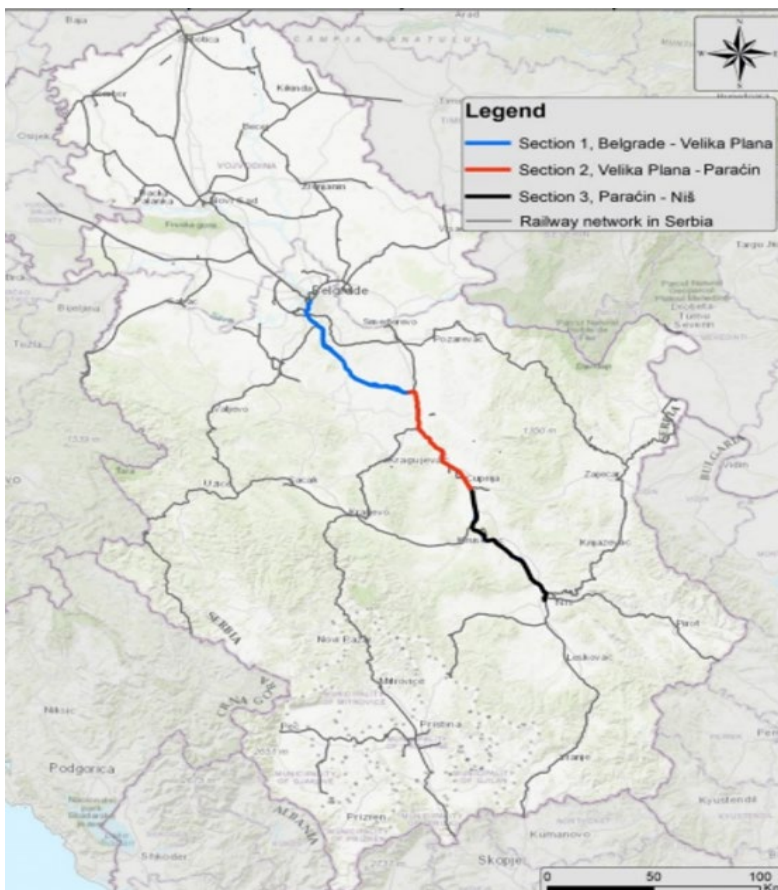
1. Introduction

The Belgrade–Niš Railway Modernisation Project (**the Project**) is one of the most significant infrastructure investments in Serbia and the wider Western Balkans region. It represents a strategic step towards enhancing railway connectivity, safety, and operational efficiency along Pan-European Corridor X, linking Central Europe with Greece and the Eastern Mediterranean.

The Project was initiated in 2021, with the objective of rehabilitating and modernizing approximately 220 km of electrified railway infrastructure between Belgrade and Niš, allowing passenger trains to reach speeds of 200 km/h and freight trains 120 km/h. Reconstructed railway will enable traffic of mix of international (limited stopping), national and regional trains in line with the highest European standards of safety, interoperability, and environmental protection.

The planned works are divided into three main sections, which are being prepared and implemented in successive phases:

- Section 1: Belgrade (Resnik) – Velika Plana
- Section 2: Velika Plana – Paraćin
- Section 3: Paraćin – Trupale (Niš)



Belgrade – Niš Railway, Section 3 marked black

The Paraćin–Trupale section (**Section 3**) represents the southernmost and final segment of the corridor, comprising:

- Subsection 3.1: Paraćin – Stalać - approximately 20.8 km;
- Subsection 3.2: Đunis – Trupale - approximately 37.7 km.

The Stalać–Đunis subsection, which is being implemented under a separate contract, spans approximately 17.7 km and serves as the central link between subsections 3.1 and 3.2.

Table 1 – Municipalities and settlements located along Section 3

Municipality / City	Settlements / Local Communities along Section 3
Municipality of Čičevac	Pojate, Lučina
Municipality of Paraćin	Vrapčane, 11. Kongres, Branko Krsmanović, Dankovo, Striža, Sikirica, Ratare, Gornje Vidovo, Donje Vidovo, Drenovac
City of Kruševac	Đunis
Municipality of Aleksinac	Vitkovac, Donji Ljubeš, Gornji Ljubeš, Srezovac, Donji Adrovac, Trnjane, Korman, Prčilovica, Moravac, Žitkovac, Nozrina, Tešica, Lužane, Bankovac, Grejač, Veliki Drenovac
City of Niš – Municipality Crveni Krst	Trupale, Mezgraja, Vrtište

The Project is being implemented by Serbian Railway Infrastructure (**SRI**) with the support of the Ministry of Construction, Transport and Infrastructure (**MCTI**). It is co-financed by the European Bank for Reconstruction and Development (**EBRD**), the European Investment Bank (**EIB**), and the European Union (**EU**) through the Western Balkans Investment Framework (**WBIF**).

The Project is currently in the public disclosure and consultation phase for the Section 3 Environmental and Social Impact Assessment documentation (**ESIA Documents**).

This Public Consultation Report (PCR) has been prepared in accordance with EBRD and EIB environmental and social requirements¹ to provide a transparent and evidence-based summary of all disclosure and consultation activities carried out for Section 3. It covers the ESIA Documents disclosure period conducted between 28 July and 31 December 2025. The PCR also presents the feedback received during this period and describes how it has been reviewed, addressed and, where relevant, incorporated into the final documentation and the Project design.

The PCR is intended for:

- Local individuals and communities along the Paraćin–Trupale alignment, who may be directly or indirectly affected by the Project works, including vulnerable groups;
- Civil society organizations, associations of citizens and media interested in sustainable infrastructure, human rights and transparency;

¹ Lenders' standards can be accessed through the following links:

EBRD: <https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2019.html>,

EIB ESS: <https://www.eib.org/en/publications/eib-environmental-and-social-standards>.



This project is funded by
the European Union



- National and local authorities responsible for Project planning, permitting, and oversight;
- The general public, including any other interested or affected stakeholders.

The PCR is a public document and will be disclosed on the official websites of Project-affected municipalities and cities within Section 3, as well as on the websites of MCTI, SRI, EBRD and EIB.

2. Stakeholder engagement requirements

2.1. National legal framework

The Republic of Serbia has established a solid legal foundation that promotes transparency, citizen participation and access to information in environmental and infrastructure projects:

- **The Constitution of the Republic of Serbia (2006)** specifically guarantees the right to a healthy environment and timely access to environmental information, as well as freedom of expression and information.
- **The Law on Free Access to Information of Public Interest (2004)** ensures that all individuals and organizations can obtain information of public importance held by authorities, reinforcing openness and transparency as core democratic values.
- **The Law on Public Information and Media (2023)** safeguards freedom of public information and the public's right to be informed on issues of general interest.
- **The Law on Environmental Impact Assessment (2024)** prescribes mandatory disclosure and consultation procedures for projects with potential environmental and social impacts, including a minimum 40-day public review period.
- **The Law on Expropriation (1995)** regulates property acquisition for projects of public interest while guaranteeing the right of affected persons to participate in the process and to appeal decisions regarding public interest, expropriation, and compensation.
- **The Planning and Building Act (2009)** requires early public participation and public review of spatial and urban plans, with disclosure periods typically ranging from 15 to 30 days, ensuring that planning decisions are informed by stakeholder input.

In summary, national legislation requires that project documentation be subject to public disclosure and consultation, with a minimum 40-day public review period and at least one formal public hearing organized by the competent authority.

The forthcoming EIA procedure for Section 3 will include all engagement steps required under Serbian legislation (public disclosure, minimum public review period, and at least one public hearing).

The Spatial Plan for the Special Purpose Area for this section has already been completed and adopted (Official Gazette No. 91/2024).

2.2. Lenders' requirements

Given the Project's scale and potential for significant environmental and social impacts, it is subject to the highest level of environmental and social due diligence required by EBRD and EIB requirements, including robust public disclosure and consultation obligations.

According to the EBRD Environmental and Social Policy (ESP) and the EBRD Performance Requirements (PR), and given that the Project is categorized as Category A, the project promoter is required to:

- Publicly disclose the ESIA and related documentation at least 120 days prior to EBRD Board consideration.
- Ensure inclusive, gender-sensitive, and culturally appropriate stakeholder engagement, taking into account the perspectives of vulnerable and marginalized groups.
- Provide documented evidence of meaningful consultation, including how stakeholder feedback has been considered and integrated into project design and management plans.
- Establish and maintain an operational Grievance Mechanism (GM) accessible to all stakeholders throughout the project lifecycle.
- Ensure ongoing stakeholder engagement throughout construction and operation, proportional to the Project's risks and impacts.

EIB Environmental and Social Standards (ESS) equally recognize stakeholder engagement as a fundamental component of sustainable project development and the protection of human and environmental rights. EIB's ESS 2 outlines six key elements of the stakeholder engagement process:

- Stakeholder Identification and Analysis – involves identifying all individuals and groups who may be affected by or interested in the Project. This includes both Affected Parties (directly or indirectly impacted communities and individuals) and Other Interested Parties (authorities, NGOs, media, etc.), with particular attention to vulnerable groups.
- Stakeholder Engagement Plan – EIB clients are required to prepare a document defining how stakeholder engagement will be conducted throughout project preparation, construction, and operation, including the grievance procedure and communication channels.
- Information Disclosure – Timely disclosure of relevant project information ensures that stakeholders understand the Project's potential risks, impacts, and opportunities, enabling informed participation.
- Meaningful Consultations – Consultations should be inclusive, participatory, and adapted to the local context and language. They should reflect the specific needs of different social groups and continue throughout the life of the Project as new issues arise.
- Reporting – Continuous provision of information to identified stakeholders, proportionate to the Project's nature, risks, and level of public interest, ensuring transparency and accountability.
- GM – Establishment of an accessible, transparent, and efficient mechanism for receiving and addressing concerns and grievances from any stakeholder in a timely and fair manner.

Together, the EBRD and EIB frameworks ensure that stakeholder engagement is not a one-time event, but a structured, ongoing dialogue that builds trust, supports risk management, and strengthens the Project's social license to operate.

On this Project, there are no specific transboundary consultation requirements.

2.3. Integration into the Project SEP

Given that the Project encompasses the entire Belgrade–Niš corridor, a dedicated Stakeholder Engagement Plan (SEP) is or will be prepared for each of the three sections. At this stage, only the SEP for Section 3 has been disclosed and is publicly accessible through the following links: <https://arhiva.infrazs.rs/> and <https://www.mgsi.gov.rs/>. The SEPs ensure transparency and demonstrate the Project's commitment to continuous engagement and openness to stakeholder feedback throughout all phases of the Project.

The Project's SEP combines the obligations of Serbian legislation with the EBRD and EIB requirements. Although national law provides a strong basis for transparency and participation, the international financiers' standards introduce broader, more structured and continuous engagement requirements.

Following the principle of applying the higher standard, the Project SEP aligns with EBRD PR 10 and EIB ESS 2 wherever these provide stronger protection of the rights of affected people and communities compared to national laws. This ensures that all stakeholders benefit from enhanced access to information, meaningful participation, and effective GM.

The following chapter of this PCR describes how these SEP commitments were implemented in practice during the ESIA disclosure for Section 3.

3. Summary of ESIA Documents disclosure and consultation activities

3.1. Public disclosure process

The ESIA documentation for Section 3 was publicly disclosed in accordance with EBRD and EIB requirements. The public disclosure process was initiated on 28 July 2025 and lasted until the end of 2025. During this 5-month period, all key technical, environmental and social documents and related information made available to the public both online and in printed form.

The public disclosure process began with the publication of the ESIA Documents by SRI and MCTI on their official websites, in both English and Serbian languages.

The ESIA Documents included the following:

- Stakeholder Engagement Plan (**SEP**)
- Environmental and Social Impact Assessment (**ESIA**)
- Environmental and Social Management Plan (**ESMP**)
- Environmental and Social Action Plan (**ESAP**)
- Biodiversity Management Plan (**BMP**)
- Biodiversity Appropriate Assessment (**BAA**)
- Resettlement Policy Framework (**RPF**)
- Non-Technical Summary (**NTS**).

The disclosure links remained continuously available to the public for the entire period.

In addition to publication on institutional websites, all municipalities located along Section 3 also made the ESIA Documents publicly available on their official websites and ensured that printed copies were accessible in municipal buildings. For this purpose, SRI provided each municipality with a hard copy of the complete ESIA Documents in Serbian.

The ESIA Documents was made available in hard copy at the following addresses, and online through the websites:

- Serbian Railways Infrastructure (SRI): <https://arhiva.infrazs.rs/esia-deonica-3-paracin-trupale-nis/> and <https://arhiva.infrazs.rs/esia-section-3-paracin-trupale-nis/>
Address: Nemanjina 6, 11000 Belgrade, Serbia
- Ministry of Construction, Transport and Infrastructure (MCTI): <https://www.mgsi.gov.rs/lat/dokumenti/javni-uvida-u-esia-studija-o-proceni-uticaja-na-zivotnu-sredinu-i-drustvo-za-deonicu>
Address: Nemanjina 22-26, 11000 Belgrade, Serbia
- Municipality of Čićevac: [https://www.cicevac.rs/dokumenta/%C5%BBelezni%C4%8Dka%20pruga%20Beograd-Ni%C5%A1:%20ESIA%20Deonica%203%20Para%C4%87in%20%E2%80%93%20Trupale%20Q\(Ni%C5%A1\)](https://www.cicevac.rs/dokumenta/%C5%BBelezni%C4%8Dka%20pruga%20Beograd-Ni%C5%A1:%20ESIA%20Deonica%203%20Para%C4%87in%20%E2%80%93%20Trupale%20Q(Ni%C5%A1))
Address: Karađorđeva 106, 37210 Čićevac



- Municipality of Paraćin: <https://www.paracin.rs/index.php>
Address: Tome Živanovića 10, 35250 Paraćin
- City of Kruševac: <https://krusevac.ls.gov.rs/aktuelnost/javni-uvod-u-dokumentaciju-o-procni-uticaja-na-zivotnu-sredinu-i-drustvo-za-modernizaciju-pruge-beograd-nis-deonica-3-paracin-trupale-nis/>
Address: Gazimestanska 1, 37000 Kruševac
- Municipality of Aleksinac: <http://www.aleksinac.org/index.php/oglasna-tabla-2/obavestenja-2/2522-zeleznica2025-1>
Address: Knjaza Miloša 169, 18220 Aleksinac
- City of Niš – Municipality Crveni Krst: <https://gocrvenikrst.rs/>
Address: Bulevar 12. Februara 89, Niš.

To ensure that the public was adequately informed about the ongoing disclosure process, SRI also prepared and distributed 300 printed notification posters and 2.000 information fliers to all Project-affected local self governments (**LSG**) - Paraćin, Čičevac, Aleksinac, Kruševac, and the City Municipality of Crveni Krst in Niš. These materials were displayed in municipal buildings, local community offices, post offices, green markets, and other frequently visited public places to ensure that all interested citizens were informed and had an opportunity to access the disclosed documentation.

Additionally, hard copies of the NTS and SEP were distributed to all settlements along the route (five copies per settlement) to enhance accessibility of information.

Photographs documenting the placement of posters and distribution of materials are provided in Annex 1 of this Report.

3.2. Public Consultations and focus group meetings

In line with SEP, SRI organized a series of public consultations and focus group meetings to ensure that stakeholders along Section 3 were directly informed about the Project and the draft ESIA documents. The purpose of the consultations was to provide representatives of local self-governments, residents of the affected communities, and other affected stakeholders with clear information about the Project, its technical characteristics, and its expected environmental and socio-economic impacts, and to gather feedback, concerns, and suggestions in line with European standards and Serbian regulatory requirements. Stakeholder input will be considered and incorporated into the final ESIA documents which will be publicly accessible on the affected municipalities', SRI, and MCTI websites once the ESIA package is finalized, in line with SEP requirements.

Proposed dates and venues for all consultation and focus groups meetings were timely communicated by SRI to the affected municipalities on 11–12 August 2025. The dates were agreed between SRI and the local authorities and publicly disclosed in accordance with the SEP. Municipal representatives then informed local community representatives through official emails and direct telephone communication, after which local communities disseminated the information to

residents. Invitation letters were publicly disclosed through municipal and community notice boards, websites, local media, and community networks (such as Viber and Facebook groups). In several settlements, local communities additionally held short coordination meetings to relay information and clarify the consultation schedule. Invitation letters were also displayed at community offices, cultural centers, municipal buildings, post offices, health centers, bus stops, local markets, and other frequently visited public locations to ensure broad and timely access to information.²

Across all public consultation meetings, the agendas followed a uniform structure, with content adapted to the specific impacts relevant to local context.

Each consultation session was conducted according to the following agenda:

- Presentation of the Project, its technical characteristics, and its significance for the improvement of railway transport;³
- Information on the expected environmental and socio-economic impacts of the Project and planned mitigation measures;
- Exchange of views and questions from participants;
- Other matters.

At the beginning of each meeting, participants were informed that their attendance was voluntary and that signing the attendance sheet was optional. Permission for any audio recording was requested in advance. Participants were kindly asked to hold their questions and comments until the discussion session following the presentation. The consultation sessions were conducted in an open and respectful manner, following clear rules of procedure to ensure equal opportunities for all participants to ask questions and express their views.

Public consultations included PowerPoint presentations to ensure consistent delivery of information relevant to all affected communities.

The organization of focus groups followed the same channels of communication as for public consultations. However, information was additionally directed to specific stakeholder groups via their associations (e.g., women's associations, Roma associations, hunting associations). These organizations further informed their members through their own internal communication networks. Focus group meetings were held without presentations and were instead based on structured questionnaires designed to gather detailed feedback on the Project's potential E&S impacts specific to each group.

² Photographic evidence of the placement of invitation letters and the distribution of consultation materials is provided in annexes 2 and 5 of this Report.

³ The presentation is available at the following link: https://arhiva.infrazs.rs/wp-content/uploads/2025/11/PPF9-Paracin-Trupale_public-consultations_eng_final.pdf.

Consultations and focus groups were fully accessible to all interested stakeholders. Meeting venues were centrally located and open to all community members, without restrictions on participation. All events were conducted in Serbian, the local language. Stakeholder participation varied by location and was generally active, with numerous questions and requests for clarification on technical, environmental, and social topics.

In addition to fulfilling formal disclosure requirements, the direct engagement through public consultation meetings and focus group discussions proved particularly valuable for communicating with stakeholder groups who may be at higher risk of adverse impacts, including Roma communities, women, and hunting associations. Meetings held in smaller settlements enabled residents to express their views freely, convey concerns directly to the project team, and receive immediate responses to their questions and comments.

Local self-governments demonstrated a strong willingness to support the Project and facilitate effective stakeholder engagement.

The consultation process proved highly relevant for understanding local needs and site-specific concerns. Residents showed particular interest in land expropriation, resettlement, and compensation; design and location of underpasses/overpasses; railway design, alignment, and stations; access to land and local roads; environmental and wildlife impacts; safety and railway fencing; local infrastructure and utilities; socio-economic impacts on daily life, local businesses, farms, and travel distances, and concerns of vulnerable groups, including gender aspects, employment, training etc. Feedback received will enable the Project team to verify impacts identified in the ESIA, adjust mitigation measures where needed, and clarify technical aspects of the Project. Further details on how stakeholder feedback has been considered and integrated into the ESIA and Project design are presented in Section 4.3.

3.2.1. First round of public consultations (8–12 September 2025)

The first round of public consultations was held in the municipalities and cities along Section 3 — Ćićevac, Paraćin, Kruševac, Aleksinac, and Niš.

The consultations were organized in venues proposed by the respective local authorities, such as municipal premises, local community offices, or cultural centres, depending on local needs and accessibility for residents.

The meetings were attended by representatives of the municipalities and local communities, as well as residents of the respective settlements and other interested stakeholders.

The following Table 1 contains key information about these consultations:

Table 2 – First round of public consultations

Date / time	Municipality / City	Local community	Type of Event	Location	Number of Participants	Key Topics
08.09. 2025 / 10 AM	Čičevac	Pojate and Lučina	Public Meeting	Cultural Centre, 106 Karađorđeva St.	50 (21 women, 29 men)	- Land expropriation and compensation timeline; - Railway alignment and technical design of over/underpasses; - Vibration and safety impacts on houses; - Agricultural land access; - Flood protection; - Noise barriers; - Railway capacity and station design; - Status of the Special Purpose Spatial Plan.
09.09. 2025 / 10 AM and 13 PM	Paraćin (two consultation sessions)	Vrapčane, 11. Kongres, Branko Krsmanović Dankovo (first session) Striža, Sikirica, Ratare, Gornje Vidovo, Donje Vidovo, and Drenovac (second session)	Public Meeting	Theatre Hall, Dr Dragoljuba Jovanovića St., no. b.b.	43 (9 women, 34 men) + 61 (14 women, 47 men)	- Organization of alternative crossings and temporary access routes during construction; - Design and use of underpasses/overpasses, pedestrians and service roads; - Expropriation and compensation procedures; - Land and property access during and after construction; - Drainage, flood prevention, and water management; - Relocation of local infrastructure and stations; - Noise barriers and mitigation measures; - Construction phasing and timeline; - Technical aspects of design speed (200 km/h) and railway alignment; - Need for broader local consultations.
10.09. 2025 / 11 AM	Aleksinac	Vitkovac, Donji Ljubeš, Srezovac, Gornji Ljubeš, Donji Adrovac, Trnjane, Korman, Prčilovica, Moravac, Žitkovac, Nozrina, Tešica, Lužane, Bankovac, Grejač, and Veliki Drenovac	Public Meeting	Assembly Hall of the Municipality of Aleksinac, 169 Knjaz Miloša St.	70+ (approx. 10 women)	- Pedestrian and vehicle crossings; - Railway alignment and technical design of over/underpasses; - Safety near schools and residential areas; - Land expropriation, resettlement, compensation procedure and timeline; - Maintenance of underpass pumps and relocation of utilities; - Animal crossings, noise barriers, and flood protection; - Agricultural access and travel distance to fields; - Railway relocation; - Construction waste management and contractor responsibilities

Date / time	Municipality / City	Local community	Type of Event	Location	Number of Participants	Key Topics
11.09. 2025 / 10 AM	Kruševac	Djunis	Public Meeting	Hall of the Local community Đunis, Đunis b.b.	12 (3 women, 9 men)	- Land expropriation and compensation procedures; - Alignment clarification; - Station status.
12.09. 2025 / 10 AM	Niš	Trupale, Mezgraja, and Vrtište	Public Meeting	Trupale Cultural Centre, 4 Nišavska St.	45 (9 women, 36 men)	- Land expropriation, compensation procedure and timeline; - Railway alignment and technical design of over/underpasses; - Access to local and agricultural roads; - Railway alignment and vibration near houses; - Preservation of local infrastructure (football field, fountain); - Temporary traffic management during construction; - Station status.

Note:

- Minutes from these consultations are included in Annex 4.

3.2.2. Second round of public consultations (22 September – 2 October 2025)

Held in settlements directly affected by the Project Section 3 (Ćićevac, Paraćin, Aleksinac, Niš), this round focused on localized discussions with residents of affected communities. The objective was to collect more detailed feedback from the local on the Project's potential impacts and mitigation measures.

All meetings were organized in venues proposed by the respective local authorities, such as local community offices or cultural centres, depending on local needs and accessibility for residents. Representatives of the municipalities and/or local communities attended the meetings, alongside residents of the respective settlements.

Table 3 – Second round of public consultations

Date	Municipality / City	Local community	Type of Event	Location	Number of Participants	Key Topics
22.09. 2025 / 11 AM	Ćićevac	Pojate, Lučina	Public Meeting	Cultural Centre Pojate, Karađorđeva St.	10 (men)	- Locations and technical characteristics of underpasses and overpasses; - Organization of alternative crossings and temporary access routes during construction; - Station status; - Access to agricultural land during and after construction; - Land acquisition procedures and compensation timeline;

Date	Municipality / City	Local community	Type of Event	Location	Number of Participants	Key Topics
						- Animal crossings and fencing along the railway; - Safety measures during construction.
23.09. 2025 / 10 AM and 13 PM	Paraćin (two consultation sessions)	Vrapčane, 11. Kongres, Branko Krsmanović Dankovo (1. session) Striža, Sikirica, Ratare, Gornje Vidovo, Donje Vidovo, Drenovac (2. session)	Public Meeting	Theatre Hall, Dr Dragoljuba Jovanovića St., no. b.b.	29 (5 women, 24 men) + 24 (7 women, 17 men)	- Land acquisition, expropriation and resettlement procedures, compensation timeline; - Access across the railway and closure of local crossings; - Road safety and protection of residents during construction; - Impacts on local businesses, farms, and daily life; - Temporary access arrangements and connectivity issues; - Flooding, drainage, and environmental concerns; - Train operation concerns (speed, frequency, and safety); - Settlement division (railway fencing); - Need for broader local consultations; - Role of the Municipality in the consultation process.
29.09. 2025 / 09 AM and 12:30 PM 30.09. 2025 / 09 AM and 12:30 PM	Aleksinac ⁴ (four consultation sessions)	Tešica, Lužane, Bankovac, Grejač, Veliki Drenovac (1.session); Prćilovica, Moravac, Žitkovac, Nozrina (2.session); Trnjane, Korman (3.session); Vitkovac, Donji Ljubeš, Srezovac, Gornji Ljubeš, Donji Adrovac (4.session)	Public Meeting	Cultural Center Tešica, Cultural Center Žitkovac, Cultural Center Trnjane, <u>Cultural Center Vitkovac</u>	4 (men)	- Legalization of structures in the railway protection zone; - Groundwater concerns; - Clarification of crossings and plots on the map.
02.10. 2025 / 10 AM	Niš	Trupale, Mezgraja, Vrtište	Public Meeting	Trupale Cultural	18 (5 women, 14 men)	- Property access, land acquisition, and expropriation; - Resettlement concerns;

⁴ No participants attended the first three scheduled consultations in Aleksinac; only the fourth consultation in Vitkovac was held.

Date	Municipality / City	Local community	Type of Event	Location	Number of Participants	Key Topics
				Centre, 4 Nišavska St.		- Location and design of planned crossings. - Local infrastructure (especially water supply); - Visual and environmental impacts on the settlement; - Access to local and agricultural roads; - Preservation of local infrastructure (football field, fountain).

Notes:

- No second-round consultations were held in Kruševac due to the very short length of the project section (170 m) and the limited scope of potential project impacts within the settlement.
- Minutes from these consultations are included in Annex 4.

3.2.3. Focus groups – vulnerable groups and NGOs (9–17 October 2025)

Following the two rounds of public consultations, targeted focus group meetings were organized with representatives of vulnerable groups and NGOs to exchange information, understand specific needs and concerns, and gather tailored feedback on the potential environmental and social impacts of the Project.

These meetings provided an opportunity for participants to discuss how the Project may affect these specific groups and to contribute to measures that enhance Project positive effects and mitigate potential adverse impacts.

Vulnerable groups were identified based on the socio-economic baseline of the ESIA and the vulnerability screening set out in the SEP. The focus groups targeted the following stakeholder categories:

- Roma communities;
- Women's associations;
- Hunting associations.

During the focus group meetings, the Project team:

- Presented information about the Project and guided participants on how to access the ESIA documentation.
- Explained the purpose of the meeting and its relevance for local communities.
- Used structured questionnaires designed to gather detailed feedback on the Project's potential E&S impacts specific to each group.
- Encouraged participants to provide feedback, concerns, and suggestions.
- Emphasized the availability of a grievance mechanism throughout all Project phases, in line with EBRD and EIB standards.

These meetings ensured that the consultation process was socially inclusive and that the views of groups at higher risk of adverse impacts were adequately represented.

Table 4 – Focus groups – vulnerable groups and NGOs

Date	Municipality / City	Stakeholder group	Type of Event	Location	Number of Participants	Key Topics
09.10. 2025 / 10 AM	Niš	Roma National Council and the Roma Cultural Center	Focus group meeting	Niš, Assembly Hall of the City Municipality of Crveni Krst, 89 Bulevar 12. Februara Street	11 (8 women and 3 men)	- Socio-economic conditions of the Roma community (employment, livelihoods, household income); - Interest in project-related employment opportunities and training needs; - Roles and potential involvement of the Roma Cultural Center in community engagement and training delivery; - Safety and accessibility during construction and operation (protective fencing, children's safety, scrap collection risks); - Use of railway services, barriers to access, and expected improvements after modernization; - Gender aspects within the Roma community (decision-making, women's economic participation); - Potential impacts of foreign workers and preference for prioritizing local employment; - Proximity of Roma settlements to the railway line.
09.10. 2025 / 12 PM	Niš	Hunting association "Nis"	Focus group meeting	Niš, Assembly Hall of the City Municipality of Crveni Krst, 89 Bulevar 12. Februara Street	2 (men)	- Hunting ground characteristics and key game species (partridge, hare, pheasant); - Potential impacts of fencing on dog training and wildlife movement; - Concerns about disruption of pheasant breeding; - Noise disturbance and temporary relocation of wildlife; - Need for adequate wildlife crossings and additional suggestions; - Proposal to install denser fencing at the lower embankment; - Request to avoid construction during hunting season; - Proposal for compensation through partial use of "Srbija Šume" territory; - Economic and tourism value of hunting (foreign visitors, local income).

Date	Municipality / City	Stakeholder group	Type of Event	Location	Number of Participants	Key Topics
10.10. 2025 / 10 AM	Paracin	Women's association "Nasa podrška" and Association of persons with muscular dystrophy of the Pomoravlje district.	Focus group meeting	Paracin, Regional Innovation Center, Svetog Save Street bb.	15 (11 women and 4 men)	- Vibrations near the station – mitigation needed; - Women's employment and opportunities; - Impacts of Žabare crossing closure on access, services and quality of life; - Request for bridge/overpass at Žabare - Low railway use; Need for nearby station; - Women's organizations – need for training; - Local vs. foreign workers – employment priority; - Public information for safety during construction; - Gender and property ownership; fair compensation.
10.10. 2025 / 12:30 PM	Paracin	Roma association "Đurđevdan"	Focus group meeting	Paracin, Regional Innovation Center, Svetog Save Street bb.	2 (1 woman and 1 man)	- Only 2–3 Roma households near railway; no significant displacement expected; - Living conditions poor; unemployment common; gender equality improving; - Railway reconstruction could provide local employment and training opportunities; - Maintain access at Dankovo crossing for all residents; - No cultural/religious sites affected.
16.10. 2025 / 10 AM	Cicevac	Hunting association „Hajduk Veljko“	Focus group meeting	Cicevac, Fazenerija, Hajduk Veljkova Street 116a	7 (2 women and 5 men)	- Introduction of hunting association, coverage area, member base, and main game species (hare, pheasant); - Animal movement and migration patterns near the railway corridor - Impacts of railway reconstruction on wildlife and hunting activities; - Need for adequate wildlife crossings; - Proposal to install denser fencing at the lower embankment; - Measures for wildlife protection: culverts, underpasses, fencing, afforestation; - Key zones for wildlife crossings and management of critical habitats; - Temporary construction impacts (noise, vibration) on wildlife; - Economic and tourism value of hunting.
16.10. 2025 / 13 PM	Paracin	Hunting association „Paracin“	Focus group meeting	Paracin, Regional Innovation Center,	7 (1 woman, 6 men)	- Overview of the Paraćin hunting ground, species, and seasonal activities;

Date	Municipality / City	Stakeholder group	Type of Event	Location	Number of Participants	Key Topics
				Svetog Save Street bb.		- Concerns about railway fencing disrupting wildlife migration and dividing hunting areas; - Identification of key animal migration routes and placement of underpasses; - Temporary construction impacts (noise, vibration) on wildlife; - Economic implications for association (membership fees, game meat, trophies); - Proposed mitigation measures (culverts, underpasses, partial use of land managed by "Srbija Šume").
17.10. 2025 / 10 AM	Aleksinac	Roma association "Prcilovica"	Focus group meeting	Aleksinac, Komitet Hall, 144 Knjaza Miloša Street	5 (of which 4 municipal representatives and 1 Roma (man) community representative)	- Proximity of Roma settlements to the railway line; - Living conditions and economic situation (unemployment, social assistance, casual labor); - Perceptions of railway modernization and expected benefits; - Interest in potential local employment and training opportunities; - Access to essential services during construction (schools, healthcare, utilities); - Safety and accessibility measures (protective fencing, construction/operation risks); - Community awareness and communication preferences (information via association representatives, inclusion in consultations); - Gender equality and property ownership (male/female equality, ownership patterns, legal status of houses).
17.10. 2025 / 12:30 PM	Aleksinac	Hunting associations "Tigar" and "Deligrad"	Focus group meeting	Aleksinac, Komitet Hall, 144 Knjaza Miloša Street	4 (men)	- Overview of hunting areas, species, and seasonal activities; - Concerns about railway fencing blocking wildlife migration routes; - Safety risks for wildlife due to collisions with fencing; - Potential division of hunting grounds and impacts on hunters' access; - Effects of construction noise, vibration, and habitat disruption on wildlife; - Economic implications for hunting tourism and association revenues. - Proposed mitigation measures (animal underpasses, regular

Date	Municipality / City	Stakeholder group	Type of Event	Location	Number of Participants	Key Topics
						maintenance, partial use of land managed by "Srbija Šume").
17.10. 2025 / 15 PM	Aleksinac	Ethno Women's Association "Korman"	Focus group meeting	Aleksinac, Cultural Centre Korman, Korman Street bb.	21 (women)	- Economic opportunities and income from Project-related activities; - Women's participation in community and agricultural work; - Railway use and access to local services. - Safety and safe crossings; concerns about settlement division; - Temporary construction impacts (noise, vibration); - Effective inclusion in consultations and decision-making. - Awareness of property rights and inheritance practices.

Note:

- Minutes from these focus group meetings are included in Annex 4.

3.2.4. Additional round of public consultations (5–6 November 2025)

Following the second round of consultations, which was limited in citizens' participation, an additional set of consultation meetings was organized in Aleksinac and surrounding settlements. The purpose of these consultations was to additionally present the Project and engage in localized discussions with residents of affected communities to collect more detailed feedback on the Project's potential impacts and proposed mitigation measures.

All these meetings were also held in venues suggested by the respective local authorities, in this case cultural centres, to ensure accessibility and convenience for residents. Representatives of local communities attended alongside residents from the respective settlements.

Table 5 – Additional round of public consultations

Date	Municipality	Local community	Type of Event	Location	Number of Participants	Key Topics
05.11. 2025 / 16 PM	Aleksinac	Trnjane, Korman	Public meeting	Cultural Center Trnjane	40 (4 women, 36 men)	- Traffic management and road safety; - Locations and technical characteristics of underpasses/overpasses; - Organization of alternative crossings and temporary access routes during construction; - Station status; - Access to properties and agricultural parcels; - Land acquisition, expropriation, and compensation; - Drainage, flood protection, and environmental concerns; - Railway noise and construction disturbances; - Settlement division (railway fencing);

Date	Municipality	Local community	Type of Event	Location	Number of Participants	Key Topics
						- Property devaluation; - Impacts on daily life.
05.11. 2025 / 18:30 PM	Aleksinac	Vitkovac, Donji Ljubeš, Srezovac, Gornji Ljubeš, Donji Adrovac	Public meeting	Cultural Center Vitkovac	26 (2 women, 24 men)	- Land acquisition, expropriation, and compensation; - Design, locations and technical characteristics of underpasses/overpasses (including pedestrian crossings); - Access to properties and agricultural parcels; - Station status and location; - Impacts on roads, utilities, and travel distances; - Railway protection zone.
06.11. 2025 / 16 PM	Aleksinac	Tešica, Lužane, Bankovac, Grejač, Veliki Drenovac	Public meeting	Cultural Center Tešica	15 /1 woman, 14 men)	- Status and locations of railway stations; - Railway alignment and technical design of underpasses/overpasses; - Technical feasibility of additional pedestrian crossings; - Land acquisition, expropriation scope, and compensation timeline; - Access to affected properties and plot identification; - Communication process between the Municipality and project team; - Safety and maintenance concerns for underpasses; - Impacts on daily life (travel distances).
06.11. 2025 / 18:30 PM	Aleksinac	Prćilovica, Moravac, Žitkovac Nozrina	Public meeting	Cultural Center Žitkovac	45 (12 women, 33 men)	- Expropriation process, affected plots, and compensation timeline; - Project design process; - Railway alignment and technical details of underpasses/overpasses; - Accessibility for persons with disabilities; - Potential house demolitions and displacement; - Station status; - Road connections, fencing, noise, and vibration during construction; - Local connectivity and access during and after construction.

Note:

- Minutes from these consultations are included in Annex 4.

A total of 567 participants attended the public consultations and focus group meetings, of whom 147 were women and 420 were men. These figures represent the number of attendees who signed the participation sheets, while the actual number of participants was likely higher, as not all individuals signed in at every meeting.



In addition to participation in meetings, stakeholders also submitted comments in writing through the Project's GM. During the public disclosure period to date, a total of 20 written grievances (8 women/12 men) and 22 written inquiries (8 women/14 men) were received. All written submissions were registered in accordance with the GM and processed following the procedures described in the SEP.

4. Summary of stakeholder feedback and SRI response

4.1. Methodology for data collection and documentation

During all meetings, participants were informed about the consultation process and the availability of the GM and were encouraged to submit additional questions or grievances on issues requiring further review.

All stakeholder feedback received during the ESIA disclosure period was systematically recorded and reviewed by SRI and the engaged Consultant. Feedback was documented through standardized Minutes of Meetings for all public consultations and focus groups, written submissions and email correspondence received through the Project's GM.

The comments received were categorized by stakeholder group and by topic (e.g., expropriation, crossings, access, environmental concerns) to allow their structured assessment and response. The purpose of this assessment was to identify inputs that require revisions to the ESIA Documents, as well as to document the justification for cases where specific comments will not be accepted or where no amendments to the ESIA Documents will be considered necessary.

Where divergent views among stakeholders were identified, these were recorded and addressed through additional explanations and further technical review.

All documentation and reports about these activities were prepared in line with EBRD/EIB requirements on transparency, while ensuring that no confidential or identifying information is disclosed in the public.

Feedback submitted through the GM during the disclosure period was reviewed using the same methodology and is summarized in Section 4.2.3. of this PCR.

4.2. Summary of stakeholder feedback

4.2.1. Key themes emerging across public consultations and focus groups

During the ESIA disclosure period, stakeholder feedback was obtained through public consultations, focus group meetings, written submissions, and the Project's GM. Several consistent themes emerged across municipalities, stakeholder groups, and consultation rounds. These themes are summarized below, while specific topics raised during consultations may be seen in Annex 4.

- **Expropriation, compensation and land access**

Issues related to expropriation were among the most frequently raised topics across all municipalities. Residents sought clarification on property valuation methodology, timing of compensation payments, categorization of agricultural land, and the process for resolving disputes.

Concerns were also expressed regarding access to remaining land parcels after expropriation, especially where the railway alignment or construction works temporarily limit mobility or create longer detours.

The need for timely communication on affected plots was repeatedly emphasized.

- **Access, crossings and mobility during construction**

Concerns regarding access disruptions and the closure or modification of level crossings were prominent in several settlements (for example: Žabare, Gornje Vidovo, Striža, Dankovo, Trnjane and Vitkovac).

Residents highlighted the potential division of settlements, longer detour routes for residents, schoolchildren and farmers, and the need for safe, reliable alternative roads during construction.

Several settlements raised requests for additional underpasses/overpasses or pedestrian crossings to minimize adverse impacts on daily life and local economic activity.

- **Station and halts accessibility (closures, relocations and service availability)**

Several questions raised during public consultations related to the planned closure of local railway halts along Section 3.

Communities expressed concerns regarding:

- Reduced accessibility for elderly residents and daily commuters where halts are proposed for closure;
- The suitability and location of newly proposed stations, including the distance from residential areas;
- Potential impacts on local mobility patterns, especially for schoolchildren and persons with limited mobility;
- The need for safe pedestrian and vehicular access to future station facilities.

Municipal representatives in Aleksinac requested continued coordination with SRI during detailed design to ensure that the final configuration of stations reflects local access needs and does not create disproportionate burdens on vulnerable groups.

- **Noise, vibration and safety during operational use**

Stakeholders expressed concerns about increased noise levels, vibration impacts on residential structures, and the safe movement of pedestrians and vehicles in proximity to the upgraded railway. These concerns were prevalent especially in Paraćin, Aleksinac and settlements with dense residential structures near the existing track.

Stakeholders requested additional information on planned noise barriers, safety fencing, emergency access routes, and mitigation measures.

- **Drainage, flooding and local hydrology**

In Paraćin, Aleksinac and several rural settlements, drainage and flood risks were identified as key concerns. Participants sought assurances that the upgraded railway would not exacerbate flooding, particularly near watercourses (e.g., Crnica River) and agricultural lands.

Residents requested more detailed explanations of planned culverts, water management systems and maintenance responsibilities.

- **Local business impacts and economy**

Business owners and farmers raised issues regarding access for delivery vehicles, continuity of operations, movement of agricultural machinery, and potential economic losses due to temporary changes in traffic flows.

In Žabare and other settlements, stakeholders requested coordinated scheduling of construction activities to prevent undue disruption to local businesses.

- **Feedback from vulnerable groups and NGOs**

Focus group discussions with vulnerable groups (including Roma communities, women, persons with disability, and hunting associations) provided important qualitative insights:

- Roma communities expressed overall support for the Project and emphasized the need for employment opportunities, training programs, and community liaison during construction.
- Women's groups highlighted concerns regarding increased travel distances due to crossing closures and community severance, impacts on access to services, and safety considerations for children and elderly people.
- People with muscular dystrophy and reduced mobility raised concerns related to vibrations, access to future stations and crossings, and the need for barrier-free solutions.
- Hunting associations raised issues related to wildlife movement, fencing density, and potential impacts on hunting activities and tourism.

These perspectives helped identify group-specific risks and preparation of inclusive mitigation measures, which will be detailed in the final ESIA Report and ESMP.

Below is feedback received from vulnerable groups and hunting association, as a result of which mitigation measures SIA Chapter 19.7, including Table 19.28 Measures for mitigation of adverse impacts and enhancement of beneficial impacts and ESMP have been updated.

Roma Communities

Although Roma settlements are generally not located in the immediate vicinity of the railway corridor, consultations highlighted risks of economic exclusion due to unemployment and limited access to construction-related jobs.

Mitigation measures:

- In cooperation with the Contractor, provide prioritised access to basic employment opportunities for Roma community members (e.g., cleaning, auxiliary tasks, simple construction support) based on transparent equal-opportunity criteria.
- Deliver short job-readiness and safety trainings with Roma associations to prepare interested candidates for site-related work.
- Use Roma associations as formal channels for continuous communication, mobilisation for trainings, dissemination of safety notices, and support in grievance uptake through culturally appropriate liaison points.
- Conduct targeted awareness-raising sessions on construction safety, dust/noise exposure, and cooperation with construction teams, adapted for low-information settings.

Women's Groups

Increased travel distances from crossing closures and community severance pose safety risks for women accessing services, schools, and markets, increasing gender gaps in mobility along the corridor. Vulnerable women in rural areas may face heightened childcare burdens and transport costs.

Mitigation measures:

- Explaining pedestrian crossings (planned in the design to be safe) to avoid community severance and reduce risks of violence or accidents, especially for women and girls traveling to schools, markets, and health services.
- Implementing community awareness programs to ensure women's safety near construction sites and during transit.
- Ensuring access to nearby essential services (healthcare, education, markets) is maintained or enhanced during construction periods through targeted support.
- Engaging local women's associations as formal channels for consultation, information dissemination, and mobilization for training and awareness activities.
- Providing direct and transparent communication to women through their representatives, ensuring timely information on construction works, access changes, and safety measures.
- Supporting economic participation of women during construction, for example through provision of meals, sale of local products, or other income-generating activities.
- Organizing training, networking, and empowerment programs to strengthen women's participation in community life and decision-making.

Disabled people

During reconstruction, inaccessible temporary routes and construction zones may pose physical hazards, while vibrations and dust can worsen health issues for those with mobility impairments.

During operation, risks include lack of accessible infrastructure at stations and on trains, such as ramps, elevators, tactile pavements, and accessible toilets. Furthermore, absence of assistance services and information services for disabled travelers can increase isolation and dependence.

Mitigation measures include installing ramps, lifts, tactile guidance, and auditory signals. Regular accessibility audits with participation of disabled people and NGOs should be conducted throughout construction and operation. Measures also include safe, accessible detour routes during construction, dust and vibration control, training for railway staff on assisting disabled passengers, and accessible communication of schedules and grievance mechanisms.

Hunting Associations

Fencing along the railway corridor, combined with existing linear infrastructure such as highways, can fragment wildlife habitats, impede animal migration, reduce hunting yields, and affect hunting tourism. Dense fencing may also increase the risk of wildlife collisions and poaching.

Mitigation measures include:

- Optimizing fencing density along the railway embankment, with gaps and appropriate design for small mammals and reptiles.
- Providing adequate animal underpasses and culverts at known wildlife migration routes to ensure safe passage.
- Implementing afforestation and habitat restoration around animal crossing points to improve connectivity.
- Aligning construction timing with hunting seasons and avoiding critical periods for wildlife, where feasible.
- Establishing joint monitoring programs and regular communication with hunting associations to address impacts and adaptive management measures.
- Considering compensation measures for potential loss of hunting grounds in coordination with Serbian Forests ("Srbija Šume"), where applicable.
- Maintaining continuous communication through hunting associations to inform members about construction activities, mitigation measures, and wildlife protection measures.

4.2.2. Summary of written grievances/inquiries received during ESIA disclosure

In addition to feedback obtained during public consultations and focus groups, 42 written grievances/inquiries were submitted to SRI by local residents and their representatives during the ESIA Documents disclosure period.

These issues were reviewed following the same methodology described in Section 4.1, and a consolidated anonymised summary is provided in the table below.

Table 6 – Summary of grievances/inquiries received during the ESIA disclosure period

No.	Location / Settlement	Stakeholder Group	Topic	Issue Raised (Summary)	Project Response
1	Donji Ljubeš–Aleksinac	Local resident	Expropriation	Request not to expropriate an agricultural household and for clarification of the route.	Designer confirmed that the alignment is fixed and the land lies within the regulation line; SRI explained where designs can be consulted and outlined the expropriation process.
2	Žitkovac	Local residents	Expropriation	Request for clarification whether land is planned for expropriation and details of the process.	SRI explained disclosure procedure, shared links to ESIA, SEP, RPF, and informed about upcoming consultations.
3	Drenovac	Local resident	Station and crossing closure	Request to keep an existing station and level crossing open due to concerns about village accessibility.	Inquiry was forwarded to Designer, who explained legal, technical and traffic reasons for closing one crossing and providing a new underpass; SRI relayed the response.
4	Korman–Aleksinac	Local community representatives	Community severance & crossings	Concerns about longer routes to school, closure of a crossing towards neighboring village, and potential impacts on a local football field.	Designer clarified that a new underpass is located close to the existing crossing, that a pedestrian/cyclist underpass is provided at the cancelled crossing, and that the football field is not physically affected by the railway works.
5	Gornje Vidovo	Local residents	Level crossing	Concern that closure of a level crossing will cut the village off from the main road and affect heavy vehicle routes; proposal to relocate the crossing.	Designer explained optimisation of grade-separated intersections, short distance to neighboring underpasses and the need to avoid unjustified spacing; proposal to relocate the crossing was not accepted.
6	Aleksinac	Local residents	Expropriation & design	Inquiry about whether design is final and whether parcels for expropriation are identified.	SRI clarified that Conceptual Design is not final and that parcels will be known upon finalisation of the Expropriation Elaborate.
7	Paraćin	Local residents	Crossing design	Request for location of overpass for trucks near the station.	Designer clarified location as part of the new bypass road.
8	Ratare (Paraćin)	Local residents	Underpass design	Request for underpass drawing and technical explanation.	Designer provided drawing and explanation.
9	Drenovac	Local residents	Expropriation	Request whether several family-owned parcels are subject to expropriation and to what extent.	SRI explained that details depend on final design and the Expropriation Elaborate; Designer and SRI legal department clarified that only parts within the regulation line are expected to be expropriated.
10	Gornje Vidovo	Local residents	Underpass location	Request to extend a local street and build an additional underpass to improve village access.	Designer explained that an underpass already exists within a short distance and that adding another would require cancelling a neighboring underpass and create unjustified spacing; the request was not accepted.
11	Drenovac	Citizens' association	Water drainage, stop closure, cultural monument	Concerns about drainage at a new underpass, closure of a rail stop and future access to a local monument.	Designer confirmed that drainage design was agreed with local authorities, that remaining stop will sufficiently serve users and that the monument will be relocated to an accessible public location; SRI provided requested maps and process explanations.
12	Vrtište	Local residents	Expropriation & local road	Request to avoid expropriation of specific residential land and	Designer confirmed that an alternative local road solution is technically feasible; SRI committed to consider this in the next

No.	Location / Settlement	Stakeholder Group	Topic	Issue Raised (Summary)	Project Response
				to use an existing road instead of a new overpass connection.	design stage and to avoid expropriation of the concerned residential plot.
13	Vrtište	Local residents	Expropriation & local road	Follow-up request to rely on existing local road network instead of the originally planned new connection.	Designer confirmed that the proposal is acceptable for the next design stage; SRI confirmed that expropriation of the concerned residential plot will be avoided.
14	Žitkovac	Local residents	Expropriation / general comment	Comment encouraging timely demolition where needed and expressing support for the Project.	SRI expressed appreciation for support and clarified that demolitions are undertaken strictly in accordance with Serbian law and procedures.
15	Trupale	Local residents	Road access & crossing	Question whether level crossing will be closed during/after construction and concern about access from a local street.	Designer clarified that the road connection will remain functional and that the referenced local street lies outside the project scope; SRI shared maps with the resident.
16	Vrtište	Local residents	Sports field, bus stop & access	Concerns about loss of a local sports field, status of a drinking fountain, relocation of a bus stop and access to the new station.	Designer explained that the existing sports field will be affected but an alternative location is foreseen with local authorities; the fountain remains unaffected; the bus stop will be relocated with a possible upgrade of a local road, and a service road will connect to the new station.
17	Žabare – Paraćin	Local residents	Closure of level crossing	Request to build a vehicle underpass instead of closing an existing level crossing, citing increased travel time and local petition.	Designer and MCTI reviewed alternatives and concluded that a grade-separated solution at that location would require demolition of many houses; instead, a new transverse road connection in line with local urban plans will be provided; SRI informed residents and continues to coordinate on implementation.
18	Trupale	Local residents	Expropriation	Question whether a specific house will be expropriated.	SRI clarified that only part of the associated land is within the regulation line and that the main residential building is not scheduled for expropriation, subject to the formal expropriation process.
19	Žabare – Paraćin	Local residents	Closure of level crossing	Concern that closure of the level crossing will prolong daily travel to work and school and increase costs; request for alternative solution.	SRI acknowledged the complaint and considered these concerns jointly with other Žabare-related grievances in further discussions with Designer and MCTI on alternative road connections.
20	Paraćin	Local business	Closure of level crossing	Concern from a local company that closure of the crossing will negatively affect business operations and employees.	SRI acknowledged the complaint and took business-related concerns into account in subsequent coordination on road solutions for the Žabare area.
21	Paraćin	Municipal authorities	Spatial planning	Municipal comments on the Spatial Plan for the Belgrade–Niš railway in the Paraćin area.	SRI acknowledged receipt and considered the remarks in ongoing coordination with MCTI and the Designer during refinement of planning and design documentation.
22	Paraćin	Local residents	Expropriation	Request for full expropriation of a privately-owned plot rather than partial expropriation.	SRI explained that expropriation is based on the Expropriation Elaborate and that owners may request full expropriation of remaining parts if they become unusable, subject to decision by the competent authority.

No.	Location / Settlement	Stakeholder Group	Topic	Issue Raised (Summary)	Project Response
23	Pojate (Ćičevac)	Local business	Underpass & expropriation	Concern that a new underpass may reduce space for truck parking and affect a storage facility; suggestion to use alternative land.	Designer explained technical reasons for the selected underpass location and confirmed that parking can still be accommodated; SRI and legal department explained the expropriation process. A follow-up concern on manoeuvring space was sent back to Designer for further review.
24	Lužane (Aleksinac)	Local residents	Expropriation	Inquiry about whether several agricultural parcels will be affected.	Designer clarified which parts of the land fall within the regulation line; SRI legal department explained owners' rights and the expropriation procedure.
25	Žitkovac–Moravac	Local residents	Expropriation	Several parcels queried regarding potential impact on land and buildings.	Designer and SRI legal department clarified which parcels and structures are expected to be partially or fully expropriated and explained options for owners under the Expropriation Law.
26	Aleksinac	Local residents	Underpass design & property boundaries	Request for sketches and explanation of one underpass and its impact on neighboring plots.	Designer provided situational plans and clarified which parts of adjacent plots fall within the regulation line; SRI forwarded the explanation and drawings.
27	Žitkovac	Local businesses	Expropriation (commercial property)	Inquiry regarding potentially affected commercial parcels and facilities along the alignment.	Designer identified which commercial areas are likely to be affected; SRI legal department explained the expropriation procedure and timing.
28	Lužane (Aleksinac)	Local residents	Expropriation	Question whether a residential plot and house will be demolished.	Designer clarified that only a small part of the plot is within the regulation line and that residential structures are not expected to be demolished; SRI explained that details will be confirmed during the formal expropriation process.
29	Grejač (Aleksinac)	Local residents via municipality	Underpass for pedestrians	Request from local community for a pedestrian underpass to ensure safe access to school for children after railway modernisation.	Designer confirmed that a pedestrian underpass at the current level crossing can be considered in the next design phase; SRI informed the municipality that the request will be addressed in subsequent project stages (PGD/PZI).
30	Moravac (Aleksinac)	Local residents	Expropriation	Question whether both land and a house on a particular plot are affected.	Designer clarified that only a minor part of the land falls within the regulation line and that the house is not planned for expropriation; SRI explained the expropriation procedure.
31	Prčilovica (Aleksinac)	Local residents	Expropriation	Inquiry about whether a specific parcel in the village is affected.	Designer confirmed that only part of the parcel falls within the regulation line; SRI explained that the precise scope will be defined by the Expropriation Elaborate and formal procedure.
32	Moravac (Aleksinac)	Local residents	Overpass & expropriation	Inquiry about potential relocation of an overpass to avoid expropriation and about status of affected land.	Designer explained that expropriation of some land cannot be avoided for technical reasons; SRI provided additional explanation of the expropriation process and owners' rights.

No.	Location / Settlement	Stakeholder Group	Topic	Issue Raised (Summary)	Project Response
33	Grejač	Local residents	Level crossing closure & expropriation	Group concern about closure of an existing level crossing, longer travel to a new overpass, and possible expropriation of houses; proposal for an underpass at the current crossing.	Designer clarified that only one auxiliary structure is expected to be demolished, explained technical reasons for the new overpass location and suggested planning a pedestrian underpass at the current crossing in a later design phase.
34	Prčilovica (Aleksinac)	Local residents	Expropriation & alignment	Inquiry about why the alignment crosses a particular parcel and whether houses will be demolished.	Designer confirmed that only part of the land is within the regulation line and explained alignment selection; SRI clarified the expropriation procedure and that details will be defined in the formal process.
35	Vitkovac	Local residents	Expropriation & access	Inquiry about how much of a privately-owned plot will be expropriated and how access to remaining property will be maintained.	Designer explained that an access road parallel to the railway will be provided and that only parts of several plots along the slope are needed; SRI explained that the exact extent of expropriation will be determined once the Expropriation Elaborate is completed and forwarded follow-up questions to the Designer.
36	Lužane (Aleksinac)	Local residents	Expropriation	Inquiry whether several family-owned parcels in the village are planned for expropriation.	Designer prepared drawings indicating the areas expected to be expropriated; SRI sent these with a brief explanation of the process.
37	Lužane (Aleksinac)	Local residents	Expropriation	Inquiry regarding the status of a single agricultural plot.	Designer provided a drawing and clarification on whether the plot falls within the regulation line; SRI complemented this with a short overview of the expropriation procedure.
38	Trnjane (Aleksinac)	Local residents	Expropriation	Inquiry about the status of multiple parcels and request for information on the expropriation process.	Designer clarified that only a small part of one parcel is likely to be expropriated, and others are not affected; SRI provided information on the expropriation process and owners' rights.
39	Prčilovica (Aleksinac)	Local residents	Access road & expropriation	Request to adjust previously planned access roads on private land and to preserve an existing fence and drainage.	Designer confirmed that access arrangements can be adjusted in later design phases; SRI explained that the fence may need to be temporarily removed and that any affected utilities will be reinstated.
40	Paraćin	Local residents	Expropriation procedure	General inquiry about the expropriation procedure for the Project.	SRI legal department provided a written explanation of the expropriation steps, competent institutions and rights of affected owners.
41	Paraćin	Local residents	Expropriation procedure	Another general inquiry about expropriation procedure.	SRI legal department provided the same written explanation of the expropriation process.
42	Žitkovac	Local residents	Expropriation	Inquiry about whether several residential parcels in the settlement will be affected.	Designer confirmed that parts of the parcels are expected to be expropriated while residential buildings are not; SRI provided drawings and a short explanation of the expropriation procedure.

In addition, letter from Commissariat for Refugees and Migration was received noting that migrants passing through Serbia on foot use railway corridor Niš-Belgrade, which should be considered in regard to their safety. The letter has been considered and relevant documents, including ESIA, SEP, and ESMP have been updated accordingly.

All these issues were registered in the SRI's internal log, reviewed by SRI and the Consultant, and addressed in line with the procedure defined in the SEP. Responses were provided either directly by SRI or by forwarding the inquiry to the Designer and subsequently communicating the official technical position back to the complainant.

The analysis of grievances and inquiries shows that the majority of concerns relate to the expropriation process and compensation. Stakeholders primarily sought clarification on whether their land would be affected, whether full-plot expropriation could be considered, and how valuation and legal procedures would be conducted.

Issues related to access and level crossings were also frequently raised. These include requests to retain existing level crossings, proposals to construct or relocate planned underpasses or overpasses, and suggestions for additional pedestrian crossings. Such concerns reflect strong community sensitivities around local mobility, school access, and potential increases in travel distances.

Other issues raised include water drainage near underpasses, the status of stations/halts, local road connectivity, and broader community amenities.

Overall, the grievances and inquiries highlight clear community priorities: maintaining local connectivity, minimising physical and economic displacement, ensuring transparent information regarding expropriation, and addressing mobility and safety needs at the settlement level.

SRI will continue operating the GM throughout all Project phases, ensuring accessible communication channels, timely responses, and full alignment with the procedure prescribed by the SEP.

4.3. Response of SRI to community concerns

Throughout the ESIA disclosure process, SRI acted in good faith and made consistent efforts to communicate openly, provide timely information, and address concerns raised by local residents, community representatives, municipal authorities and vulnerable groups to the extent possible.

All issues raised during public consultations, focus groups and through the GM were reviewed jointly by SRI and the Consultant. Where concerns related to technical aspects of the Project, such as the design of underpasses/overpasses, road access, drainage systems, noise barriers, station configuration or alignment corrections, SRI forwarded the questions to the Project Designer, ensured preparation of official technical clarifications, and communicated the responses back to stakeholders in a timely manner. Consequently, a number of community requests have been or

will be incorporated into the conceptual or construction design, where technically feasible, demonstrating a willingness to adjust Project solutions according to social demands.

The following issues raised during ESIA disclosure could not be resolved at the Conceptual Design stage but have been agreed as commitments for further analysis and follow up during subsequent phases:

- To assess the feasibility of designing a pedestrian and cyclist underpass in the village of Grejač during the Design for Building Permit (PGD) phase;
- To exclude parcel no. 4934 in the village of Vrtište from expropriation (as communicated on 17 September 2025);
- A proposal to construct a new sports field in the village of Vrtište, in coordination with the Crveni Krst–Niš municipal district;
- A proposal to modify the public bus line route Vrtište–Niš, in cooperation with the local self-government;
- A commitment to ensure that the access road is constructed before reaching parcel 4598/1, and that its alignment does not pass through parcels 4599/3 and 4599/1 (Cadastral Municipality Prćilovica).
- A commitment to ensure coordination between Municipality of Paraćin, MCTI and SRI to enable timely execution of that planned bypass road (ring road) around Paraćin (Žabare), including bridge over the Crnica River which would significantly reduce the community severance impact (the planned bypass infrastructure is out of Project scope and its responsibility of Municipality of Paraćin).

In areas where concerns could not be fully resolved at this stage, particularly issues related to parcel-level expropriation impacts, precise property boundaries, local road reconfiguration outside the railway zone (This relates to a road network that is quite far from the railway line and does not fall within the Project scope. More precisely, this refers to the settlement of Žabare, i.e. the construction of a bridge over the Crnica River, which is defined in the Paraćin Municipality plan and is located at a minimum distance of 0.5 km from the railway line.), or the schedule of construction works, SRI clearly communicated the limits of the current ESIA phase and explained that these matters will be addressed during the preparation of the Expropriation Study, the Resettlement Action Plan and the Detailed Design. SRI committed to organising additional rounds of consultations once parcel-specific information becomes available and plans to ensure that affected persons can meaningfully participate in subsequent decision-making stages. SRI offered clarifications on issues related to legal procedures, explaining compensation principles and confirming that no household will be left without access or displaced prior to receiving compensation and a suitable grace period.

Requests that could not be addressed

Certain issues could not be accepted, particularly those repeatedly raised by multiple stakeholders or at the community level, due to technical, spatial or safety constraints:

- Underpass in Šumadijska Street (Paraćin)

A grade-separated crossing could not be designed at this location without requiring the demolition of a significant number of houses. Constructing an underpass would remove direct access from Franše D'Eperea Street to the Paraćinka factory. The proximity of the state road (25 m from the railway) prevents a solution that meets minimum safety criteria.

- Relocation of Grade Separation from Ratara to Opposite Gornje Vidovo

The proposal would eliminate the crossing with the highest road-traffic frequency and relocate it to an area lacking adequate road infrastructure. It would also disrupt the evenly spaced distribution of adjacent intersections. The design team therefore assessed the proposal as unjustified and technically unjustified.

For issues related to temporary construction impacts (noise, dust, vibration, temporary road deviations), SRI clarified that mitigation measures will be elaborated further through the CESMP and site-specific contractor plans, and that any damage during construction will be compensated through the GM in accordance with the SEP. During the construction phase, as specified in the SEP, SRI will hold at least one public consultation meeting (and others if needed) in each affected LSG (Paraćin, Čičevac, Aleksinac, Kruševac and Niš) to present Project progress and gather feedback on the impacts of construction activities. If necessary, the SRI will organize additional meetings in local community offices where the need for such engagement arises, based on stakeholder requests, grievances received, or observations made during monitoring and site. The meetings will be attended by the representatives of the Contractor and the Supervising Engineer.

In addition, prior to the detailed design completion meetings with communities will be held to inform them about the final design. The SEP will be updated, as part of finalising the ESIA package, to reflect this planned engagement.

SRI will strive, in the remaining phases of the Project, to continue and further strengthen stakeholder engagement activities, drawing on lessons learned and good international practice, to ensure that outstanding issues are addressed in a structured, transparent and participatory manner.

5. Conclusions and next steps

The public consultation process for Section 3 engaged a broad range of stakeholders and generated significant feedback on relevant technical, social and environmental aspects of the Project.

Several issues raised during consultations will contribute to clarifications and changes in the ESIA Documents and further Project design where technically feasible.

SRI will maintain continuous communication with stakeholders throughout the all Project sections and phases, including regular updates, targeted meetings, and the GM functioning.

The Project remains committed to transparency, inclusiveness, and meaningful engagement with all affected and interested stakeholders.