



RESETTLEMENT ACTION PLAN

FOR THE CONSTRUCTION OF THE RAILWAY BYPASS AROUND NIS

OCTOBER, 2019

ABBREVIATIONS

RAP	Resettlement Action Plan
MFI	International Finance Institutions
RPF	Resettlement Policy Framework
DoP	Developers of Plan
BoP.....	Beneficiary of Project
BoE.....	Beneficiary of Expropriation
SRI.....	JSC Serbian Railways Infrastructure
CoN	City of Nis
CoNCM.....	City of Nis Municipalities
CoNA	City of Nis Administration
CFD	Central Feedback Desk
RECO	Real Estate Cadaster Office
EIB.....	European Investment Bank
RS	Republic of Serbia
GoRS.....	Government of Republic of Serbia
MCTI.....	Ministry of Construction, Transport and Infrastructure
PAP	Project Affected Person
PAF	Project Affected Family
PAHO.....	Project Affected Household
GRP	General Regulation Plan
BRP.....	Bypass Re-parcelization Project
CM.....	Cadaster Municipality

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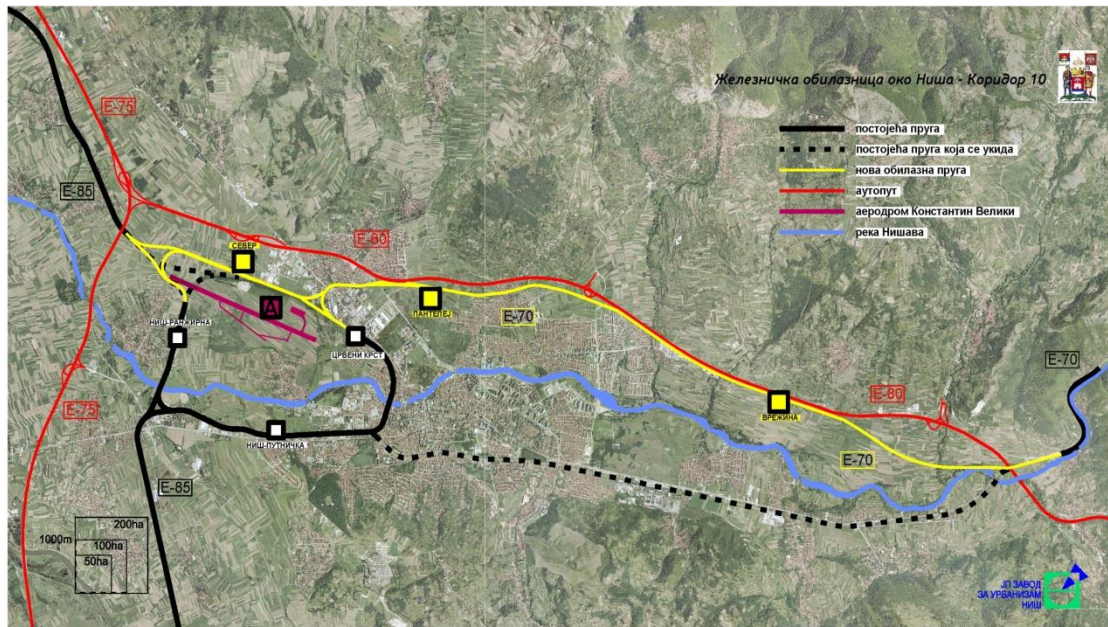
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1. INTRODUCTION

The Resettlement Action Plan (RAP) has been prepared for the purpose of the realization of the construction of the railway bypass around Nis as part of a comprehensive project of REHABILITATION AND MODERNIZATION OF THE RAILWAY LINE NIS – DIMITROVGRAD.

Namely, for more than 40 years City of Nis (CoN) has had a need to relocate the section of Nis-Dimitrovgrad railway which passes through the very city center because it has become a multiple problem for the city. By that railway route the city is divided into two parts so one of the City Municipality (CM), CM Palilula, is completely cut off from the rest of the CoN at the moment of passing the trains in the direction of Nis-Dimitrovgrad or vice versa. The safety risks that existed and exist (in the last 30 years more than 20 citizens of Nis lost their lives in the accidents on the railway tracks) are: frequent failures of the technique at the railway crossings with the situations that at the time of train passing the barrier is not lowered, the serious disturbance of the environmental standards due to the high density of population on the both sides of the railway tracks, the inability of the CoN infrastructure development in that part of the city, all these are the reasons accepted by EU sufficient for the approval of the funds for preparation of the preliminary project design.

The project is the result of serious economic, environmental and technological analyses and the elaboration of several variants of the relocation of the railway from the immediate city center. The variant with the construction of the bypass around the CoN, after the adopted preliminary design, has proved to be the most correct. The adopted study is a result of full compliance of the representatives of EU, Ministry of Construction, Transport and Infrastructure (MCTI), JSC Serbian Railways Infrastructure (SRI) and CoN.

2. IFI STANDARDS IN RESETTLEMENT PROCESS

Adopted Preliminary Design at the stage of elaboration and the selection of one of several offered variants, meant compliance with IFI standards and requirements, as follows:

- Minimize the need for involuntary land acquisition, involuntary resettlement and relocation of business and residential buildings to the least extent, with full respect of Ifi requirements in terms of obtaining adequate compensation for the involuntary purchase of buildings and land,
- The expropriation process fully involves reviewing the impact of the project on the loss of economic income of legal entities and people under the direct or indirect impact of the project,
- The basics and rules that were followed by the Developers of Plan (DoPs) when drafting the RAP include:
 - a) Adoption of the rule to ensure adequate compensation for expropriated property during the expropriation of land and buildings in private ownership, whereby landowners are fully equated with land users, irrespective of the fact from whom they obtained the land (from the State or CoN), as well as the owners of the objects built with permission or without permission. Similarly, legal successors who are identified with an adequate decision on the inheritance issued by court or a notary, are completely equal with formal property owners;
 - b) Compliance with special rules in the event of a route does not include areas where the vulnerable or marginalized groups reside or live;
 - c) In order to fully realize the rights of persons who are directly or indirectly affected by the project, in addition to protecting the rights established by domestic legislation, the drafting of an RAP implies the establishment of Central Feedback Desk (CFD) that provides an additional opportunity to protect the rights of all dissatisfied Project Affected Persons (PAPs), and
 - d) Full compliance with other requirements and IFI rules contained in the RPF document adopted by both DoPs.
- Cut-off date that determines the right to compensation for the expropriated property (land and buildings) was determined on the date of adoption of the Bypass General Regulation Plan (GRP) as the basic planning document by the General Assembly of CoN on June 24, 2016. The Plan of the General Regulation was published in the Official Gazette of CoN in July 2016, on the official website of the CoN and official websites of the CoN CMs, making it available to all interested parties in CoN and wider. Also, through the national and local media, press conferences and other communication means, the citizens of CoN and wider were informed of Plan of the General Regulation details and the need that the residents of 12 local communities, i.e. 12 cadaster municipalities should be prepared for expropriation activities. Information was specifically provided that the drafting of the Project of Re-parcellation was undergoing to let the citizens know that the employees of the company preparing the Re-parcellation Project would be in the field and that the citizens were obliged to cooperate with them, and to resolve any objections and

problems with the person designated by CoN for this project (address and office hours and contact phones (landline and mobile) were provide as well). This project identifies: the number and condition of all facilities which are expropriated for the construction of the Bypass (residential, business, auxiliary and infrastructure), their owners who have the right to a compensation, as well as the members of their family households that will suffer the effects and losses, and who will have to move to new locations. The supplementary document on the basis of which the right to compensation of objects is exercised is a cadastral-topographic plan of parts of CoN that includes the future bypass made in June 2016.

- The compensation represents the building value of the objects that are expropriated determined by the competent institution for the evaluation of the value of the facilities. The determined construction value of the facility includes the value of the built-in construction material, the value of the work on the construction of the facility, all utility and other taxes and fees necessary for obtaining a building permit, as well as the value of fees to be paid to public utility companies for provision of the connection to the utility infrastructure (electricity, water, sewage, etc.). It is significantly higher compared to the market value of the objects that are being demolished for the reason of serious disturbance of the real estate market in this part of Serbia. That is why the building value of the buildings is more adequate to full compensation in terms of the IFI practice and requirements because it enables the owners of the expropriated facilities to build the same facilities at another location, if that is their need.

3. STEPS IN RAP PREPARATION

Based on the date from the Study on Expropriation as a part of the Bypass Preliminary Design, Bypass Re-pacelization Project (BRP) has been prepared.

Starting from these two planning documents, the total land area covered by the Bypass Project has been determined, and it forms an area of about 100 hectares of different ownership structure, with 1743 land plots of which:

- Land owned by the state 31 land plots
- Land owned by the state given for use to: :
 - JSC Serbian Railways..... 50 land plots
 - PE Roads of Serbia 132 pland plots
 - PE Srbijavode 7 pland plots
- Land owned by CoN 261 land plots
- Land in the property of or with the right of usage by the citizens..... 1262 land plots

Please note that citizens with the right to use the land under the laws of Serbia are equal with the owners of the land plots with the obligatory conversion without paying the fee for the value of the land which is converted.

The project of re-parcelization covers 483 plots with all their surfaces and other land plots covered by GRP have been divided in BRP according to the needs of Bypass project and they were given new numbers in Real Estate Cadaster Office (RECO) with the BRP implementation.

Following the implementation of the BRP in RECO, the RECO solutions were made for each owner and user individually, and according to the new condition with the new cadastral number of parcels/land plots, from which each owner could see the new parcel numbers, the area to be expropriated, the change of land use from agricultural to construction (where parcels are registered as agricultural land in RECO), as well as the legal basis for such a change (a decision of the Republic of Serbia Government (GoRS) on pursuit of the public interest).

All solutions were sorted by Cadastre Municipalities (CMs), which were 13 in the BRP coverage, after which consultative meetings were held with representatives of CoN, RECO and three CoNCM in whose territory the listed parcels were located. The way of informing citizens and the delivery of the solution made by RECO to the owners and the users of parcels that are the subject of expropriation has been agreed. The entire activity was coordinated by DP authorized persons who acted upon the MCTI solution.

On the basis of these data, an official list of all parcels, (expropriated in whole or in part) was established. An integral part of this RAP is the review of the number of parcels/land plots per CM.

The following methodology of further cooperation with citizens was established:

- Make a unique written notice for citizens - PAPs for a meeting at in local community center premises or in the CoN CM conference rooms with the stated date and theme of the meeting,
- Prepare an explanation for citizens about the significance of expropriation where the State declared a public interest and the necessity of involuntary resettlement,
- Give all explanations and answer all the questions and concerns of the citizens,
- The method of delivering RECO solutions,
- To introduce citizens with the procedure of expropriation and the way of protection of rights in case they are not satisfied with the degree and manner of realization of their rights (the necessity of buying out the remaining part of the land plot, the method of determining the value of buildings that are being demolished due to the construction of the bypass, the method of determining the value of the land that is expropriated, the method of determining compensation paid in money, provision of documentation in cases where no inheritance procedure has been carried out, the activities of the CoN bodies in cases where it is impossible to determine or find a formal owner of the property, the manner of delivery of the decision issued by RECO to the citizens who are not present at the meeting, the manner and deadline of an appeal to the RECO solution in case of dissatisfaction of the owner and the user of the land plot and alike).

After a public hearing on the document RESETTLEMENT POLICY FRAMEWORK, in September 2016, in the hall of CoN Assembly, with the presence of a large number of citizens and interested persons, representatives of the EIB, SRI and CoN, this document was

signed by the Mayor of Nis and became binding in the preparation of other documents accompanying expropriation, and above all binding in the process of making the RAP.

Meetings with citizens - PAPs were held in 13 local communities comprising 13 cadastral municipalities: Medoševac, Trupale, Popovac, Crveni Krst, Pantelej, Kamenica, Donji Matejevac, Malča, Donja Vrežina, Gornja Vrežina, Brzi Brod and Prosek. Public consultations with citizens were done in the period from October 2016 to March 2017. A large number of citizens attended the meeting - PAPs, both under the direct and indirect influence of the Project. The most common questions were when the expropriation would commence and how to resolve cases when the land plots were not registered to actual holders but to heirs or new owners who had acquired the ownership over the land plot by purchase without registering it in RECO, what the prices would be as replacement value for the land expropriation, how the remaining part of the land plot would be dealt with when the part of the plot is expropriated, and how access to the land plots parcels that remain "stuck" between the highway and the future railway bypass would be addressed. The explanations included legal provisions relating to expropriation, but also explanations contained in the RESETTLEMENT POLICY FRAMEWORK.

The meetings provided information on the opening of the CoN office for each type of information and assistance, the office address and telephone number of the person in CoN in charge who was exclusively responsible for expropriation issues and assistance to the PAPs.

An extenuating circumstance at this stage of working with PAPs is the fact that most of them are already familiar with the expropriation process because they participated in the same process in the construction of the east part of Corridor 10, since most the routes of the highways and bypass are parallel.

All LPAPs were advised to update the accuracy of the data Real Estate Folio in RECO as this would allow a faster and more accurate expropriation process before the competent CoN service.

In some of the local communities (or CMs), several meetings were held (Red Cross and Pantelej), mostly in CMs where there were residential facilities intended to be demolished, given the complexity of the problem. All information was provided in great detail at the request of all property owners.

Other citizens-owners of the land plots that are expropriated, who did not attend the scheduled meetings, the decisions issued by RECO, were delivered in a manner determined by law by the authorized persons of the RECO in Nis.

Citizens have been provided with an explanation that land users who have acquired this right in lawful manner from CoN or the State are equal with the landowners with the prior implementation of the conversion process. A number of non-landowners were present at the meetings as the person affected indirectly by the project.

Also, when it comes to the mechanism of determining the compensation for the expropriated land or objects, the DPs are of the opinion that is the laws of Serbia should be respected in determining the value of the land by the Republic Tax Administration - Branch in Nis, according to the law established form and authorization, and depending on the zone (cadaster municipalities) where the expropriated land plot is located.

The value of the objects (market and construction) is determined by expert persons-experts in the construction profession of an authorized institution.

Regarding the exercise of the owners' rights to the compensation for the objects built without a building permit, the DoPs are of the opinion that adequate construction value determined in the procedure of expertize should be recognized. This is because all buildings constructed without a building permit on the route of the future bypass would have been legalized under the Law on Building Legislation, but this is impossible only because of the construction of the bypass.

The implementation of these activities with the owners of individual residential buildings, collective housing units, owners of vacation cottages, auxiliary facilities, as well as the facilities of business entities whose objects or land plots were subject to expropriation, in whole or in part, have been done in direct communication in the field with the owners of the facilities.

On that occasion, a survey was conducted with each PAP as per the form contained in the Resettlement Plocy Framework (RFP). The survey was carried out by authorized DoP staff. Based on the survey, an official list of PAPs, the owners of the facilities to which expropriation relates, the members of the households and the number of employees in business premises to be expropriated, were made. This list is an integral part of RAP.

Outstanding contribution to the implementation of RAP has been given by the representatives of the three CoNCM in whose territory all the land plots are located, as well as by the representatives of local community centers.

Regardless of an open invitation to all thos who wished to be included there have not been any other interested organized groups or organizations.

During these activities, there was not any person who would in any way deny the right of ownership and use of land, or the right of ownership or the possession of the property by the state over the facilities.

In order to determine the procedure and to achieve the full rights of PAPs, and after the carried out survey, DoPs agree that:

- Along the bypass section there is not any disputable property rights issue regarding the ownership, use, or land or objects owned by the state,
- Only in three cases with objects in CM Prosek-Manstir there are three land tenants at the land owned by the PE Serbian Railways,
- There are not any PAP belonging to vulnerable groups,

- There are not PAHs that are exclusively or predominantly living on the income from the land which is to be expropriated,
- The value of expropriated property (land, plant and buildings) is determined in accordance with the IFI requirements and the laws of Serbia,
- In protecting the rights of PAPs full cooperation with the competent state and city authorities should be achieved, and in that sense, the complete and adequate matrix of PAP's rights should be made.

In the implementation of further activities, the DoPs announce that the final RAP Draft is available to all citizens on the official webisted of CoN, SRI and CONCMs.

In order to implement the RAP, DoPs -SRI as Beneficiary of Expropriation (BoE) appoints the authorized organization for the expertise of the value of the objects (housing, business and auxiliary) and perennial plantations on the plots, as well as the value of the remaining part of the parcel for whose processing there are no economic or functional reasons.

The reviews of the prices for the land in CM Nis will be asked from Republic Tax Administration – Branch in Nis in accordance with the methodology and authority of the Republic Tax Administration – Branch in Nis.

Based on all the above rules, SRI shall initiate the procedure under the Expropriation Law with the competent Secretariat for Property of City of Nis Administration (CoNA). SRI determines the rules of procedure for the submission of final bids for the expropriated land, establishes the contract form, the contracting mechanism, the payment of the compensation and the rules of further action in the exercise of the PAP rights in its full extent up to the moment of payment of the compensation, and further monitoring and provision of each type of assistance in time frame after resettlement. CoN also has the active role in these activities.

4. RAP FORM

Introduction

This plan encompasses all activities, rights and obligations of all participants in the expropriation process, which implies relocation of all PAPs affected by Nis railway bypass project (movable and immovable property, economic and social aspects of resettlement), as well as the activities of state bodies, the departments of CoN and SRI which should assist PAPs in excersing their rights and to reduce or eliminate all the negative consequences of the resettlement of PAPs. The plan primarily includes activities to protect the rights of the PAPs, the procedure and manner of informing PAPs about their rights and obligations, the procedure and manner of determining the compensation for the expropriated property, as well as other types of the support to PAPs during resettlement and in the post-resettlement period, in order to minimize the consequences that the bypass project implementation will have on all PAPs (direct and indirect impacts).

Since the RAP is based on the laws of RoS and IFI (EIB) rules and that it stipulates a great number of obligations and activities for DoPs, RAP is beineg reviewed and adopted by the the respective departments of DoPs, SRI Steering Committee and CoN City Council and assamble SN.

The RAP is the result of the work of the respective departments of SRI and CoN, in consultations with EIB representatives. Before its adoption by respective authorities, the opinion from EIB and MCTI will be obtained as well as the suggestions from the public since the plan will be published on the official websites of SRI, CoN, CoNCMs and the suggestions obtained during survey and visits to PAPs will be taken into consideration.

About Bypass Project

The adoption of the Plan was preceded by the adoption of planning documents:

- Bypass GRP by CoN Assembly at the session held on June 24, 2016,
- Preliminary Design and its validation by MCTI in October 2016,
- RP for railway bypass around Nis, confirmed by the Secretariat for Planning and Construction of the CONA by its Act of 23/3/2017/

The development of the planning documentation was preceded by studies that justified the selection of the projected variant. The elaboration of the feasibility study and Preliminary Design was funded by EU.

The construction of the bypass includes the acquisition of land for new railway route of about 100 hectares with about 1743 land plots, which are about 65% owned by the state and CoN and for 35% there is private ownership or right of usage. Also, the construction of the bypass implies the demolition of about 52 objects (residential, auxiliary and commercial). The expropriation of land and buildings for the construction of the bypass implied the involuntary resettlement of owners and users of land and buildings, with the prior decision of the RoSG on the pursuit of public interest and the Order of the State Attorney for Expropriation Implementation by CoNA which is responsible under the Expropriation Law.

In order to realize the project of construction of the Bypass at this stage, it is necessary to first adopt RAP in order to protect as much as possible the rights of land and property owners and to reduce the negative effects of resettlement.

Expected Impacts

The defined bypass route was the result of a serious study involving the consideration of several variants for the most economical solution, with the least percentage of new area catchment, the smallest number of objects to be removed, the smallest number of families to be displaced, and commercial facilities to be partially or completely dislocated, but also with the least negative impact on the environment and citizens who live along the new bypass route. This study is an integral part of the adopted bypass Preliminary Design.

The adopted variant of the construction of the bypass implies the permanent occupation of land of different ownership structure, as well as the complete or partial demolition of a certain

number of business, housing, auxiliary and infrastructure facilities. Following the adoption of the feasibility study, Bypass Preliminary Design was prepared, whose adoption was preceded by the approvals by SRI, PE Roads of Serbia, PE Srbjavođe and CoN. The selected variant of the construction of the bypass adopted the bypass route which was justifiable from the aspect of functionality of SRI operations, the smallest percentage of demolition of buildings, housing and business, the lowest density of CoN population in the sections where the bypass route passes as well as all aspects of the protection and safety of citizens living near and further around the Bypass.

After the adoption of GRP and Bypass Preliminary Design, the BRP was adopted and carried out in RECO which created the legal conditions for the beginning of the expropriation.

RAP Legal Framework

For the preparation of this RAP the IFI rules given in RPF as well as national laws were used:

1. Constitution of the Republic of Serbia ("Official Gazette of the RS", No 98/2006),
2. The Law on Expropriation ("Official Gazette of the RS", No 53/95, " Official Gazette of the FRY", No 16/2001 – changed by Constitution Court of RS ruling and "Official Gazette of the RS", No 20/2009, 55/2013 – decision by Constitution Court of RS and 106/2016 – authentic interpretation),
3. The Law on State Survey and Cadaster ("Official Gazette of the RS" No 72/2009, 18/2010, 65/2013 and 15/2015 - changed by Constitution Court of RS ruling, No 96/2015, 47/2017 - authentic interpretation, No 113/2017 – amended by other law, No 27/2018 - amended by other law and No 41/2018 - amended by other law),
4. The Law on Foundations of Property Law Relations ("Official Gazette of the SFRY", No. 6/80, 36/90,"Official Gazette of the FRY", No. 29/96 and "Official Gazette of the RS", No.115/2005 – amended by other law),
5. The Law on Planning and Construction ("Official Gazette of the RS", No. 72/2009 , 81/2009 (Corrigendum), changed by Constitution Court of RS ruling 64/2010 (CC), 24/2011, 121/2012, 42/2013 (CC), 50/2013 (CC), 98/2013 (CC), 132/2014, 145/2014 and 83/2018),
6. The Law on Building Legalization ("Official Gazette of the RS", No 96/2015 and No 83/2018),
7. Law on Tax Procedure and Tax Administration ((“Official Gazette of the RS”, No 80/2002, 84/2002 - corrected, No 23/2003 – corrected, No 70/2003, 55/2004, 61/2005, 85/2005 – amended by other law, No 62/2006 - amended by other law, No 63/2006 – corrected by other law, No 61/2007, 20/2009, 72/2009 - amended by other law, No 53/2010, 101/2011, 2/2012 - corrected, No 93/2012, 47/2013, 108/2013, 68/2014, 105/2014, 91/2015 – authentic interpretation, No 112/2015, 15/2016, 108/2016 and 30/2018),
8. The Law on General Administrative Procedures ("Official Gazette of RS", No 18/2016),
9. The Law on Extra-Judicial Proceedings ("Official Gazette of SRS", No 25/82 and 48/88, amended "Official Gazette of the RS" No 46/95, 18/05, 85/12, 45/13, 55/14, 6/15 and 106/15)
10. The Law on Housing and Maintenance of Buildings (“Official Gazette of RS”, No 104/2016).

Certain situations that are differently regulated by IFI rules and domestic legislation, the DoPs resolved according to the IFI rules.

All facilities on the route of the future bypass have the same treatment with regard to the right to replacement value (facilities built with permits and facilities built without permits - formal and informal owners). This is because all owners of buildings that were built on the route of the future bypass without a building permit submitted a request for legalization that would have been positively resolved if the bypass had not been planned to be built.

Also all the owners of the facilities which should be demolished will be paid the compensation in the amount of construction value determined by the competent and authorized expert institution. Thus all PAPs are guaranteed the possibility to build the same objects in another location if they wish so.

Accepting the principle that all owners of the constructed facilities have the same treatment in terms of the right to replacement value and that the compensation will be paid up to the amount of the construction value, DoPs have accepted IFI rules and requirements, since the domestic legislation, especially in the part of legal and illegal objects, has a different interpretation.

Coverage of Households and Property

On the basis of the GRP, Preliminary Design, BRP and on-site data, a list of objects, parcels and owners of objects is made. The cut-off date for the basis for the inventory of objects and the acquisition of the right to compensation is June 24, 2016 when the Bypass GRP was adopted, as well as the cadastral and topographic plan of that part of CoN that was used for the GRP and Preliminary Design. Any objects that may have been built after this date and which are not located on the cadastral and topographic plan cannot be expropriated nor can their owners exercise the right to compensation, and the same will be removed during the construction of the Bypass without the right of the owner to compensation.

According to the instruction and form from the RPF, a field survey was conducted with all PAPs, the owners of the expropriated objects and the following was determined:

1. Objects to be demolished: 53

Residential Objects with Vacation Cottages	Commercial Objects	Auxiliary Objects	Infrastructure Objects
19	16	15	3

1.1. Structure of residential objects

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Collective	Individual	Vacation Cottages	Abandoned Objects
1 building-16 apartments 11 families 40 family members	9 objects 9 families 32 family members	7 Nobody lives there	1 object of collective housing 1 object - a house

For all objects, SRI ordered that the findings of the expert of the construction profession with an assessment of the market and construction value of the objects that are being demolished for the purpose of building the bypass.

After the findings, it is clear that due to the distorted market conditions of real estate in this part of Serbia, the construction value is significantly higher than the market price for all objects. In order to achieve the maximum level of fairness and adequate compensation, the DoPs agree that the compensation is paid up to the amount of the estimated construction value. This is because only this type of compensation for the expropriated property guarantees PAPs whose objects are being demolished so that the same facility can be built on a new location. The market value does not guarantee such a possibility even remotely.

Of the total of 27 residential buildings that are being demolished, only 1 is a collective housing unit where PAPs live in 16 housing units, owned MIN Holding in bankruptcy. 11 apartments are home to mostly former employees of MIN Holding with different occupancy status, while there are no tenants in the remaining 5 units. The status of 6 families in 6 apartments is formally and legally regulated. But 5 families with the tenancy residence did not regulate their relations with MIN Holding since they are not owners but the persons with the tenancy right. The resolution of their status is of utmost importance for SRI and CoN. Their status will be settled in agreement with the Bankruptcy Agency, the Board of Creditors and the Bankruptcy Judge with the support of the SRI and CoN. It is a goal to create the conditions for these 5 families to buy apartments, thus removing formal legal obstacles for their status to be the same as the status of other tenants. RAP envisages the resolution of these 5 PAPs in the following way:

1. Determine the balance of debts of all 5 families towards MIN Holding in bankruptcy, in the name of unpaid rent to MIN Holding in bankruptcy,
2. Reach an agreement with Bankruptcy Agency in the function of the bankruptcy administrator on the write-off of a part of the debt of all 5 families by at least 50% with the approval of the Board of Creditors (already agreed in a framework),
3. CoN will settle the rest of the obligations of all 5 tenants from social funds for displacement as it is about former MIN workers who are in poor material condition,
4. After settling obligations and bringing the debt of all 5 families to the "0" state, each tenant signs a contract for the purchase of an apartment with MIN Holding in bankruptcy, and the same is notarized. The deadline for the purchase of apartments cannot be less than 5 years nor longer than 15 years, which will be regulated between the Tenant and MIN Holding in bankruptcy by the purchase agreement. CoN and SRI will monitor and control the entire procedure and provide every type of assistance to the tenants through the CFD.
5. After the conclusion of the contract, the tenant-owners acquire the right to enter the expropriation procedure and the right to compensation for expropriated apartments, according to the findings of the experts.

The procedure will be regulated by a special agreement between MIN Holding in bankruptcy, on the one hand, and tenants, CoN and SRI on the other.

Such a procedure is conditioned by MIN Holding in bankruptcy by the opinion of the Board of Creditors and is the most effective and best solution to address the issue of the tenancy rights of these 5 families. There is a prior consent for this kind of action, and CoN and SRI representatives will initiate activities to complete this within 2 months upon the adoption of the plan.

Based on conducted surveys and personal contacts it has been established that the listed PAH does not include members of vulnerable groups and persons with special needs. Acting on the instructions from the document RESETTLEMENT POLICY FRAMEWORK, the surveys were conducted with all households and PAPs, both with PAHs and with companies that should be resettled.

The surveys were prepared with all the necessary documents and inquiries from the CoN authorized officers who were previously educated and briefed on the provisions of the RESETTLEMENT POLICY FRAMEWORK, and were given clear instructions on how to respond when interviewing. In surveys of the households, the special attention was paid to find out, through the surveys, the social situation of each family based on the statement of a family member, the age of the family members, their health status and the possible existence of persons with special needs. On several occasions, especially for families residing in the MIN Holding in bankruptcy building, the CoN authorized officer for the preparation of RAP, visited in person those households, for the clarification of all the circumstances of the resettlement, especially for the 5 families that did not own the apartments since they were the tenants with tenancy rights. These families were specifically addressed in the RAP and the solution proposal was presented.

None of the surveyed PAPs were recognized as person with special needs or as the potential social care beneficiary of any form of social care under Serbian regulations.

For this reason, the RAP stated that there are no facilities or other property on the route of the future bypass that belonged to the categorization of housing units from vulnerable groups or persons with special needs.

In two private residential buildings there are two business premises in which a small-scale family business takes place. Based on the statements of the owners during the survey, their interest will be satisfied with the payment of the construction value of the housing units where the business activity is being carried out.

All surveyed households chose to be compensated for the expropriated property in money according to the findings of the building expert and according to the determined construction value of the object to be demolished.

One collective housing facility is abandoned and ruined. Nobody lives there and it is the property of the company Galofaks from Vranje, which is bankrupt.

A residential facility in the village of Prosek owned by the SRI was temporarily assigned to a worker from SRI as a residence. Considering that the building was built on a plot of land owned by SRI, SRI as Beneficiary of the Project will solve the issue of resettling its workers within the scope of its competencies and its own budget. Regardless of this specific situation this object is also covered by RAP and the survey was conducted with PAP.

1.2. Structure of commercial facilities

Company Name	Ownership	Demolition Scope	Number of Workers
Gradjevinar, in bankruptcy	public, it is not working	complete	none
Nišprojekt visokogradnja AD	private, leased out	complete	none
Mehanizacija Exol	private, leased out	complete	none
Euro Dil 1 location	private, working	partial	3
Euro Dil 2 location	private, working	partial	4
Put Inženjering	private, working	partial	17
Restaurant STOP Prosek	private, working	complete	11
Restaurant IVAN Prosek	private, working	complete	10
Trade shop Prosek	private, working	complete	3i

Working status of the commercial objects according to the RPF survey form

1. Put Inženjering- production of concrete structures – the crane path for lifting and loading of concrete elements is relocated
2. Euro Dil producing metal products on 2 locations.

Other companies:

3. Nišprojekt Visokogradnja leases business premises for storage usage
4. EXOL (former Mehanizacija) leases business premises for storage usage
5. GP Građevinar is bankrupt. The facilities are abandoned.
6. Restaurant STOP, and
7. Restaurant IVAN, and
8. Trade shop

After conducting a survey with all PAPs that lease their commercial premises, their view is that the DoPs do not need to communicate with the lessees, and that they will regulate their relations with lessees, especially with respect to the deadline in which they are obliged to notify the lessees of the termination of the contract on lease.

The SRI will order the expertise to determine the value replacement for the rights arising from the right matrix for these PAPs, regardless of the fact that they are not the

owners or users of the land on which their facilities were built, but use the land on the basis of a land lease agreement with SRI.

Two shops are engaged in hospitality activities, STOP and IVAN are erected on plots belonging to the PE Serbian Railways and under the lease agreements. According to the contract, the buildings have a temporary character, they cannot be legalized, and their owners are obliged to remove them when PE Railways of Serbia requests that. The procedure for removing objects will be agreed with the PE Railways of Serbia when the need arises due to the bypass construction.

The trade shop has the same status and relation to PE Railways of Serbia, and it will be removed at the request of the lessor.

SRI will issue an order to assess the value of these facilities and, in accordance with the law and contract, to terminate, in an adequate manner, its relationship with the owners of both restaurants as well as the owner of the trade shop.

According to its structure the auxiliary facilities are garages, storage rooms and the like and they are used by the owners of the households.

In two cases, the owners of the auxiliary facilities – PAPs have converted the premises into business premises in which they perform certain economic activities or lease the premises.

Other owners own small construction sites, garages, sheds and auxiliary facilities belonging to the owners of the residential buildings that are located next to them.

All the owners of the auxiliary facilities have declared that the compensation for the expropriated property is paid in cash.

On the route of the future bypass there are 3 infrastructure facilities 2 of which are state-owned and 1 are privately owned:

1. The overpass on the highway in CM Donja Vrežina, which is not in function and belongs to PE Roads of Serbia. It was built at the time of the construction of the Niš-Dimitrovgrad road, without access roads and without being included in CoN planning documents and it is out of use for years. It is a state property – the user is by PE Roads of Serbia.
2. Antenna pilar for telecommunications privately owned
3. Substation in CM Prosek - Manastir, which, according to RECO belongs to PE Serbian Railways – state property while the real holder is EPS ED Nis. It was recommended that these state-owned companies resolve the status of the substation between each other, prepare the re-parcelization project so that EPS can be registered as the owner of the facility and part of the parcel in RECO. The substation will not be removed because it does not interfere with the construction and operation of the bypass.

The estimation of the value of the overpass and substation has not been done since it is the state property while the estimation of the value of antenna pilar has been done.

Principles of Compensation and Assistance

On the entire route of the bypass there are no controversial property relations when it comes to land. Individual landowners, natural persons, who have the right to use the land plots, whether they have acquired the land plots from the city or the state, are equal in rights to the owners of the land plots.

With regard to the determination of the right to compensation for the objects to be expropriated, informal owners (owners of the buildings built without a permit) are equal in rights to formal owners and they will be paid the construction value of the facility on the basis of expert findings.

The rights of all PAPs were determined on the basis of direct knowledge, on-site insights and conducted surveys, and based on the situation June 24, 2016 when CoN Assembly adopted Bypass GRP and also based on the cadaster-topographic plan used for the development of GPR and Preliminary Design.

In addition to the situation in the field, a condition for qualifying for the rights of PAPs was the submitting of the valid evidence (immovable property excerpts, court decisions or contracts). In cases where it is not possible to find the owner or a legal heir, or he/she is absent for a longer period of time and it is not possible to determine his/her address of living or residence, in accordance with the law, temporary agent is appointed over such property by the competent department of the CoNA.

For the entire property that is the subject of the expropriation (buildings and land), it is a unique request from all owners and users of the property for the compensation to be paid in money.

MATRIX OF RIGHTS

TYPE OF LOSS	PERSON WITH RIGHTS	COMPENSATION POLICY
1. ECONOMIC DISPLACEMENT		
Land		
Construction land regardless to severity of loss (whether partial or complete loss)	Owner with formal title, or users of publicly/state owned construction land, and pre-nationalization owners	Cash compensation at replacement costs, or; At property owner demand, if legal terms are met, replacement land of equal or higher value and similar value in direct proximity or in the surroundings of the expropriated land together with all costs of resettlement and administrative fees needed for transfer of ownership rights, if any.
	Lessee with valid documents of the right of lease	Compensation for all investments on land. Compensation will be paid at replacement cost + Costs of equipment relocation and installation + Replacement land for lease, if land was leased from state + Compensation for all rent paid in advance, for the period not expired
Unviable land, construction	Property owners, or users of	In case the remaining area of land is not

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	publicly/state owned construction land	viable, it can be expropriated upon PAPs request and compensated according to type of property
Plants and structures on agricultural land (but not houses)		
Loss of annual crops, that could not have been harvested prior to land repossession	Owners of crops (it is not of importance if the owner of crops is owner of land, or lessee, or informal owner/user of land providing that they bore costs of planting crops)	Cash compensation which equals the value of expropriated crops including the value of time needed to produce such crop, as well as costs of possible investment (work and labour force)
Loss of perennial plants and trees (fruit bearing trees, vineyards and fruit bearing plants)	Owners of plants (it is not of importance if the owner of plants is owner of land, or lessee, or informal owner/user of land providing that they bore costs of planting)	The right to collect fruits + Cash compensation at replacement cost on the basis of sort, year and productive value, including the value of time needed to produce such crop, as well as costs of possible investment (work and labour force), to plant a new vineyard, orchard or similar, till the moment it reaches the full fructuous potential.
Affected vineyards and orchards not yet fruit bearing		Cash compensation for the investment in planting a new vineyard or orchard (labour, seedlings), including the value of time needed to reproduce a replacement vineyard or orchard.
Business structures (shops, offices buildings) etc.	Owners with formal title	Cash compensation at replacement costs, including taxes + Costs of equipment and inventory relocation and re-installation + Cash compensation on a one time basis (transitional allowance) to be determined on a case to case basis during social survey by obtaining relevant data on income and livelihood. Transitional allowance shall then be determined commensurate with the loss; or At property owner demand, if legal terms are met, replacement property of equal or higher value and similar feature, in direct proximity or in the surroundings of the expropriated building together with all costs of resettlement and administrative fees needed for transfer of ownership rights, if any
	PAPs, owners without formal title (building constructed without building permit on one's own plot of land, or on somebody else's land – usually state owned)	Cash compensation for the building at replacement cost of the structure, including taxes + Costs of equipment and inventory relocation and re-installation + Cash compensation on a one time basis (transitional allowance) to be determined on a case to case basis during social survey by obtaining relevant data on income and livelihood. Transitional allowance shall then be determined commensurate with the loss.
Loss of non-agricultural businesses	Business user (owner of land, or lessee, or informal owner/user)	Cash compensation for relocating the business, including compensation for immovable inventory and replacement cost of investment. +

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		<p>Cash compensation on an one-time basis (transitional allowance)</p> <p>+</p> <p>All registration taxes.</p> <p>+</p> <p>Appropriate level of support for improving the skills if necessary to perform restoration of income source (livelihood).</p>
2. 2. PHYSICAL RESETTLEMENT		
Buildings (residential, houses, flats, etc.)	Owner with formal title	<p>Cash compensation at replacement costs</p> <p>+</p> <p>Payment for relocation costs (moving allowance) and compensation for other costs during relocation and cash compensation on a one time basis (transitional allowance).</p> <p>or;</p> <p>At property owner demand, if legal terms are met, replacement property of equal or higher value, in direct proximity or in the surroundings of the expropriated property together with all costs of resettlement and administrative fees needed for transfer of ownership rights, if any</p>
	Informal owner – building constructed without building permit on one's own plot of land if subject to legalization	Same as owner with formal title
	Informal owner – building constructed without building permit on one's own plot of land or constructed without building permit on someone else's or state – owned – not eligible for legalization	<p>Cash compensation for the building at replacement cost of the structure</p> <p>+</p> <p>Payment for relocation costs (moving allowance) and compensation for other costs during relocation and cash compensation on an one time basis (transitional allowance).</p>
	Lessee of the affected property	Payment of resettlement costs and compensation for other costs caused by relocation and cash compensation on a one-time basis (transitional allowance).
	Lessee or person with occupancy right to state owned flat	<p>Provide lease or occupancy rights of same kind of another equivalent, social or state owned property in the vicinity. If equivalent state or socially owned flat is not available in the vicinity, PAP will be offered state or social owned flat more remote from the area of expropriated flat,</p> <p>+</p> <p>Payment for relocation costs (moving allowance) and compensation for other costs during relocation and cash compensation on a one time basis (transitional allowance), evaluated based on potential extra costs incurred by increased commuting cost</p>
Unviable buildings	Owner of building	<p>In case that the remaining building is not viable or under a physical impediment for physical use can be expropriated upon PAP's request.</p> <p>Compensation is provided in the way as prescribed for that type of building in</p>

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Other resettlement situations		accordance with this matrix.
Loss of access to usual resources and buildings	Communities or households	Replacement of public ownership or conveniences (roads and the like). Access to equal conveniences or services.
Impacts caused by temporary occupancy of land and damages to the property	Property owner	Market price of lease for duration of the occupancy. The land must be returned to original condition. Improved quality of the land due to top soiling work should not be removed, except if agreed upon differently with PAP. + Replacement cost in accordance with this matrix for affected crops, orchards, nurseries etc. + Compensation for any damages to the property evaluated at replacement costs.
*Impact on vulnerable groups	Vulnerable PAPs (according to the definition in the Glossary of this document)	On top of all rights defined in this matrix, vulnerable PAPs will be provided additional assistance including legal assistance and help during physical relocation. Any additional support required for any affected vulnerable households will be determined on case-to-case basis during socio-economic survey These PAPs are given priority of employment on the project if that is possible.
Undetermined impact	Owner or formal beneficiary	Any undetermined impact will be mitigated in accordance with principles and aims of this RPF

* The rights matrix for vulnerable groups was retained in the RAP, due to the possibility of the subsequent identification of LPUP in this category during the implementation of the RAP, considering that no vulnerable groups have been identified so far.

** All other categories of loss types described in the RFP are not covered by this RAP because they are not relevant, and according to the results of the research conducted by the Plan Donors

The users of construction land, persons, are entitled to equal rights as the owners of land plots, pursuant to Article 102, Paragraphs 1 and 2, of the Law on Planning and Construction.

CoN is also entitled to compensation for all plots where public property of CoN is established, according to RS laws.

The compensation for the loss of income of business entities will be determined on the basis of the official data of PAPs-business entities on the income they generated during the last three years of operations in the location from which they are being relocated, in accordance with the time needed for relocation and re-establishing the work process at the new location.

Determining Property Value

The value of the land has been determined by the RoS Tax Administration Branch Office in Nis and in accordance with the authorizations that belong to this service under the Law on Tax Procedure and Tax Administration. The price depends on the location of the land plot, i.e., zone – cadaster municipality, where the land plot is located. It is a law regulated form and there are not any dilemmas.

The value of the objects to be expropriated is determined by the institution responsible for the expertise chosen by SRI as BoP. In cooperation with authorized DoP representatives, the list of objects and the list of real estates from RECO were submitted to the experts for the expertise of the value of the facilities. Then they went to the site, where, in the presence of each owner, the review of the state of the building was done, the same objects were photographed and then the other data collected relevant for the legal and expert action by experts. The experts were given the task to calculate both the market and the construction value of all facilities because it was assumed that the difference in these values were great due to the market conditions in this part of Serbia.

After a certain period of time, SRI is provided with expert reports for all facilities with estimated market and construction value of the facilities. The same finding was forwarded to the representative of CoN.

The unique position of SRI and CoN is that the level of compensation is determined on the basis of the determined construction value of all facilities, because it is a more adequate fee for expropriated property-objects and it is a financial security for each PAP, if they want to build the same object on another location, that they could do it only if the construction value is accepted as compensation. In case the market value is paid as compensation, none of the PAPs could build the same facility and they would be significantly damaged, which would cause court disputes, significant costs, and the court would, based on previous experience, recognize the determined construction value in the favour of PAP.

The entire expropriation procedure is regulated by the Law of Expropriation. The procedure is carried out by the competent property department of CoN in cooperation with SRI. SRI sends a proposal to the CoN Administration Secretariat for Property for initiating the expropriation procedure for a plot or object. The Immovable Property RECO Excerpt is attached to the request by which the real owner of the land or object as well as the area of the same is determined.

On the basis of findings from the expertise of the value of the facilities, or the notification of the RoS Tax Administration Branch Office in Nis on the price of land, CoNA carries out the interview with PAP and prepares the record. After that, PAP gets the resolution by CoNA which denotes land plot cadaster number, the facility to be expropriated, the land plot where the facility is located and such resolution, when it becomes legally valid, is delivered to the BoP - SRI. SRI prepares the proposal of the agreement and it is submitted to the PAP via CoNA. CoNA sends the invitation to PAPs, notifies them of the offered agreement, after which the PAPs sign the agreement on the compensation amount, by which the right to proposed compensation is acquired. PAPs that are not satisfied with the offered compensation have the right to protect their rights through CFD and in case of further disagreement they have the right to judicial protection in the non-litigation procedure.

The compensation for the expropriated property is paid in cash into the bank account of the PAP by SRI as BoP.

Other ways of providing assistance to PAPs in the resettlement process will be awarded on the basis of written requests from PAPs addressed to SRI or CoN. On the right to apply for additional assistance, PAPs have already been informed by CFD, and all this will be presented to them once again when submitting the offered agreement. CFD will provide PAPs with assistance in written requests that will be addressed to SRI or CoN.

Also, CoN has opened a special office with engaging an expert and authorized person with full working time and with full day access to the mobile phone of an authorized person.

It is planned that all activities on the adoption of the plan and its implementation will be completed by the end of 2019. and after that, in a reasonable period of time, monitoring will be carried out with all PAPs that are resettled and who need further monitoring after the resettlement, until reaching the situation which is the same or similar to one before the resettlement.

Indirect Project Impacts

When it comes to indirect impact of the bypass project on the certain number of PAPs or PAHs there are 2 situations:

- A. As to the elimination of the effects of the impact of the project on persons whose land becomes difficult to reach or inaccessible or uneconomical for further processing, the consequences are already partially removed during the expropriation process by expropriating the rest of the parcel remaining after the expropriation. Before that the expert in the field of agriculture and traffic should check the situation in the field at the request of the owner of the land plot or CoNA. For other persons who will find it difficult to get to their plots or will be unable to access further processing of the plot, the problem will be solved by so-called construction project, i.e, SRI as BoP will build new access roads. Where this is not possible, the SRI as BoP will have to expropriate all such land. Such request from these persons can also be pointed out during the bypass construction.
- B. When it comes to removing the effects of the project's impact on the violation of environmental protection rules due to noise and environmental pollution, the same will be eliminated or the impact reduced to the minimum, by designing and installing the most up-to-date measures and means of protecting the environment against noise and pollution.

Responsibility for RAP Implementing and Informing

The system of responsibility for the implementation of the RAP includes the competent state authorities, CoN authorities and SRI authorities.

The MCTI of the GoRS has a significant responsibility in the implementation of the RAP primarily in terms of the dynamics of the expropriation process and in the planning and

provision of funds disbursed to the PAPs whose property is being expropriated. In this regard, MCTI receives monthly reports on the status of the project in all aspects.

Social welfare authorities, primarily the Center for Social Work in Nis, as a state body, have the task of constant monitoring of resettled families, their social needs, if necessary, as well as counseling activities during the period of family adaptation to the new situation after resettlement.

Within the obligations and responsibilities of the SRI as the BoP, the director and the competent management body in SRI are responsible for the RAP implementation, as well as the technical and legal teams responsible for the implementation of the entire project. The Director of the SRI appoints a special person to be the coordinator of all activities in the implementation of the RAP, both during the expropriation and during the monitoring.

The bodies of CoN responsible for the RAP implementation are the Mayor and Nis City Council as well as the people appointed by the Mayor's decision.

In addition to the statutory competences for the CoNA, SRI as the BoP, RECO, Tax Administration Branch Office in Nis, have the responsibility for the implementation and full implementation of RAP together with MMCTI has made a decision on the formation of a coordinating body consisting of MCTI, SRI and CoN who are tasked with coordinating all activities that are necessary for the lawful and efficient implementation of expropriation for the construction of the railway bypass near Nis.

Also, starting from the significance of this project for CoN, the Mayor formally established a coordinating body of 17 employees of CoNA from several professional services and public enterprises, whose task is promptness in carrying out tasks related to expropriation and PAP assistance. For this purpose, a special office where all LPAPs can get the necessary information was opened.

Following the acceptance of the Plan by the competent bodies of SRI and CoN, and after receiving the opinion of the EIB, as well as suggestions obtained from the public upon publishing the plan on official website of SRI and CoN, the process of interviewing and passing of the acts with all the owners of the facilities by CoN will follow together with the discussions between the families that are being relocated and authorized persons and bodies of DoPs, finding modalities for resolving the scope of rights for those that are not the owners of flats (occupancy right holders), forming funds at SRI and CoN for assisting PAPs that are being relocated, as well as those activities in order to implement the plan with minimum consequences for the PAPs.

The content of the Plan consists of suggestions and opinions that were obtained during the public presentation of GRP, the re-parcelization project, meetings at community centers in CMs, media appearances of the persons from the CoN and SRI, and direct communication either in the field or in the offices with experts of SRI and CoN.

LEGAL PROTECTION MECHANISMS AND COMPLAINTS

In the first phase, when PAP receives the decision made by RECO Nis on changing the purpose of the parcel or part thereof, PAP has the right to appeal to the second-instance body with the Republic Geodetic Authority in Belgrade. If the PAP is not satisfied with the second instance decision, PAP has the right to initiate an administrative proceeding with the Administrative Court.

After obtaining a second instance decision made by RECO Nis which has become final or has become final after the appeal has been resolved, CoN City Administration may initiate expropriation proceedings.

In the process of expropriation, PAP has the right to an appeal against the first instance decision made by CoN City Administration. The appeal is submitted to the Ministry of Finance of the GoRS through CoN City Administration. If the PAP is not satisfied with the decision of the GoRS Ministry of Finance PAP may initiate proceedings before the Administrative Court.

If PAP is satisfied with the decision of the CoN City Administration on expropriation, the proceeding shall be continued by submitting the final decision made by CoN City Administration to the competent body of the SRI, which shall submit the offer to PAP with a proposal for replacement value for the expropriated property. If PAP is satisfied with the offer, PAP concludes an agreement with the SRI, which, within a specified period, makes a payment to the bank account of PAP.

If PAP is not satisfied with the offered replacement value for the land or buildings, PAP has the right to initiate extrajudicial procedure with the regular court in Nis.

The first-instance decision made by RECO Nis or the second-instance decision in the case of an PAP's complaint, are the legal basis for changing the data with RECO Nis in terms of registering the state as the owner, or registering the right of use of the BoP.

Throughout the proceedings, from the first instance decision by RECO Nis to the final and valid the decision on expropriation, as well as in the process of exercising the right to substitute value, each PAP has the right to appeal to the CFD, for every form of assistance and protection of their rights, which has been established by the Decision No1/2018-1340 dated May 11, 2018 made by the Director of SRI, in the premises of SR11, at No 11/2, Trg Kralja Aleksandra, offices 71 and 71.

Also, CoN opened its office in the Kalča Business Center in Nis. The coordinator for the implementation of the Bypass Project is employed there on the 8-hour basis each working day. The office provides all the necessary logistics, which is in function of the project

realization, primarily in the function of daily contacts with PAPs and providing information to PAPs, and providing legal and any other assistance to PAPs.

Information on the formation of the CFD and its jurisdiction was provided to each person in the expropriation process in writing. The same information was published on the CoN official website. It was disseminated through public appearances of all Con people in charge.

All of these rights and protection mechanisms also apply to PAPs that are indirectly influenced by the project or in any way relate to any restrictions on the rights of persons whose property is located in the immediate vicinity of a future bypass.

Monitoring RAP Implementation and Reporting – Time Frame

In accordance with the previous practice, the reports on the RAP implementation will be delivered monthly to MCTI, EIB, SRI and CoN. If there is a need external associates will be hired depending on the type of problem.

The monitoring of the RAP implementation will be carried out by the competent and appointed bodies of the SRI and CoN in the period starting from the date of its adoption by DoPs, during its implementation and in the period of two years after the resettlement of every PAP.

Indicators for RAP implementation:

- Dynamics of the plan implementation,
- Communication with PAPs and facilitation and assistance by DoPs in the process of moving to a new location,
- Help and suggestions in adapting PAPs to a new location, faster organization of life in PPAFs and organization of work processes in PAPs-businesses,,
- Providing legal and any other expert assistance through CFD and other bodies of CON and SRI in the full exercise of the rights of the PAPs,
- Direct communication and interviewing resettled PAPs on all issues that will be of help to resettled PAPs,
- Addressing State Authorities by the bodies of DoPs in order to provide assistance and support to PAPs, if they cannot solve the problem themselves,
- Any type of assistance, support and cooperation with all PAPs that need it, and which is asked from resettled PAP

Resettlement Budget

For the implementation of RAP it is necessary to secure the budget of 17.020.000,00 EUR.

Source of Financing	Land	Objects	Additional Resettlement Expenses
RoS Budget	14.500.000,00	2.500.000,00	/

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Budgets of SRI and CoN	/	/	20.000,00
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The Resettlement Action Plan has been adopted by DoPs, SIR Steering Committee and CoN Council.

For SIR Steering Committee – president

For CoN Council – Mayor