

COMPLAINTS MECHANISM

SG/E/2025/13

RAILWAY NIS–DIMITROVGRAD (SERBIA)

INITIAL ASSESSMENT REPORT

10 MARCH 2026



SG/E/2025/13

RAILWAY NIS–DIMITROVGRAD (SERBIA)

Initial Assessment Report

Complaint confidential: No

External distribution

Complainant
Promoter

Internal distribution

Inspector General
Relevant EIB services

Disclaimers

This report is based on the information available to the EIB Group Complaints Mechanism Division up to 27 February 2026. ii

In case of discrepancies between language versions, the English version prevails.

EIB Group Complaints Mechanism — Initial Assessment Report

The EIB Group Complaints Mechanism

The EIB Group Complaints Mechanism (Complaints Mechanism) is a tool enabling the resolution of disputes if any member of the public feels that the European Investment Bank (EIB) might have done something wrong, that is, if it has committed an act of maladministration. The Complaints Mechanism is not a legal enforcement mechanism and will not substitute the judgment of competent judicial authorities.

Maladministration means poor or failed administration. It occurs when the EIB fails to act in accordance with a rule or principle that is binding upon it, including its own policies, standards and procedures. The concept of maladministration includes failure by the EIB to comply with human rights, applicable law or the principles of good administration. Maladministration may relate to the EIB Group's decisions, actions or omissions and may include the environmental or social impact of the EIB's projects and operations.

One of the main objectives of the Complaints Mechanism is to ensure the right to be heard and the right to complain. The mandate of the Complaints Mechanism includes the resolution of problems raised by complainants in cooperation with relevant internal and external stakeholders. Where possible, the Complaints Mechanism also actively promotes and supports local resolution efforts (for example, through project-level grievance mechanisms). For more information on the Complaints Mechanism please visit: <https://www.eib.org/en/about/accountability/complaints/index.htm>.

The Initial Assessment Report

The initial assessment aims to¹:

- Clarify the concerns raised by the complainants and gain a better understanding of the complainants' position as well as the views of other stakeholders, whenever appropriate (e.g. project promoter, national authorities).
- Assess whether and how the stakeholders (e.g. the complainants, the project promoter, and the relevant EIB Group project team) could seek resolution of the issues raised by the complainants.
- Determine if further work by the EIB Group Complaints Mechanism Division is necessary and/or possible (compliance review or collaborative dispute resolution between the parties) to address the allegation or resolve the issues raised by the complainants.

¹ In line with §§ 2.2.1, 2.2.2 and § 2.2.7 of the EIB Group Complaints Mechanism procedures, available at: [EIB Group Complaints Mechanism Procedures dated November 2018](#).

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1 PROJECT

- 1.1 The project concerns financing for the modernisation of the existing Nis–Dimitrovgrad railway line (the **project**)².
- 1.2 On 1 December 2017, the EIB Board of Directors approved an investment loan of up to €134 million for the project. An additional EIB investment loan of €100 million was approved by the Bank's Board of Directors in July 2024. The borrower is the Republic of Serbia and the project is being implemented by Serbian Railways Infrastructure (SRI, or the **promoter**). The project is also receiving support in the form of €106 million in grants from the Western Balkans Investment Framework.

2 COMPLAINT

- 2.1 On 24 September 2025, the Complaints Mechanism received a complaint from a project affected person. The complainant is an employee of the promoter who lives with his wife and three children in an apartment owned by the promoter. The apartment will need to be demolished for the Staničenje–Dimitrovgrad component of the project.
- 2.2 The complainant alleges that the resettlement process implemented by the promoter does not comply with the EIB Group's environmental and social standards, in particular with regard to the provision of adequate alternative housing, the rights and protections of vulnerable groups, and meaningful stakeholder engagement.

3 REGULATORY FRAMEWORK

- 3.1 The work of the Complaints Mechanism is governed by the EIB Group Complaints Mechanism Policy³ and Procedures⁴. Following the admissibility of the complaint, the EIB-CM carried out an initial assessment to determine whether further work of the Complaint Mechanism is necessary and possible. Such further work may include a compliance review or a collaborative dispute resolution process. This report presents the results of the Complaints Mechanism's initial assessment. For more information on the objectives of the initial assessment, see page iii.
- 3.2 The regulatory framework applicable to this case includes:
 - the EIB Statement of Environmental and Social Principles and Standards⁵;
 - the EIB's Environmental and Social Handbook⁶;
 - the Resettlement Action Plan (RAP)⁷;
 - applicable national policies and regulations, including the Serbian Law on Expropriation and the Law on Housing and Maintenance of Buildings;
 - contractual obligations, including those stemming from the Finance Contract.

² More information on the project can be found at: [RAILWAY NIS-DIMITROVGRAD](#)

³ § 4.2.1 of the EIB Group Complaints Mechanism Policy (policy), available at: [EIB Group Complaints Mechanism policy](#).

⁴ § 2.1.3 of the EIB Group Complaints Mechanism Procedures (procedures), available at: [EIB Group Complaints Mechanism procedures](#).

⁵ Available at: [The EIB Statement of Environmental and Social Principles and Standards](#).

⁶ In the version dated 2 December 2013 version 9.0 available at: [EIB Environmental and Social Handbook](#).

⁷ The public version of the Resettlement Action Plan is available at: <https://www.eib.org/en/registers/all/254789847>.

4 INITIAL ASSESSMENT

- 4.1 During the initial assessment the Complaints Mechanism held bilateral meetings with the complainant and the promoter and reviewed key documents. In these exchanges, both the complainant and the promoter expressed their interest in a collaborative dispute resolution process facilitated by the Complaints Mechanism.

5 WAY FORWARD

- 5.1 Following the initial assessment, the Complaints Mechanism proposes to proceed with a collaborative resolution process, taking into account the willingness of the complainant and the promoter to engage in dialogue to resolve the issues raised. A collaborative resolution process is forward-looking in nature and aims to achieve mutually accepted and sustainable solutions. The Complaints Mechanism will coordinate the preparation and implementation of this process with the parties⁸.

EIB Group Complaints Mechanism

⁸ The time limits for processing the complaint may be extended in consultation with the complainant in order to allow comprehensive engagement of the parties and to manage legitimate expectations - § 4.4.4 of the policy.