Financed under a specific grant agreement no 2018/402-850 from EU IPA II Multi-Beneficiary Programme for Albania, Bosnia and Herzegovina, North Macedonia, Kosovo*, Montenegro and Serbia

Western Balkans Investment Framework Infrastructure Project Facility Technical Assistance 8 (IPF 8)

TA2018148R0 IPA

Mediterranean Corridor, Bosnia and Herzegovina - Croatia CVc Road Interconnection, Subsection: Konjic (Ovcari) - Prenj Tunnel - Mostar North

Gap Analysis & ESIA Disclosure Pack

WB20-BiH-TRA-02 Component 1

Public Consultation Report

December 2025

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Western Balkans Investment Framework (WBIF)

Infrastructure Project Facility Technical Assistance 8 (IPF 8)

Infrastructures: Energy, Environment, Social, Transport and Digital Economy

TA2018148 R0 IPA

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The Infrastructure Project Facility (IPF) is a technical assistance instrument of the Western Balkans Investment Framework (WBIF) which is a joint initiative of the European Union, International Financial institutions, bilateral donors and the governments of the Western Balkans which supports socio-economic development and EU accession across the Western Balkans through the provision of finance and technical assistance for strategic infrastructure investments. This technical assistance operation is financed with EU funds.

PROJECT NO.	DOCUMENT NO.
WB20-BiH-TRA-02	

VERSION	DATE OF ISSUE	DESCRIPTION	PREPARED	CHECKED	APPROVED
1	9/11/2023	Public Consultation Report	Azra Merzić	Irem Silajdžić	Richard Thadani
2	06/01/2025	Public Consultation Report – final update following public disclosure	Azra Merzić	Irem Silajdžić	Richard Thadani
3	01/08/2025	Public Consultation Report – final update following public disclosure	Azra Merzić	Irem Silajdžić	Richard Thadani
4	31/12/2025	Public Consultation Report – final update following public disclosure	Azra Merzić	Irem Silajdžić	Richard Thadani

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Abbreviation	Meaning
BiH	Bosnia and Herzegovina
BMP	Biodiversity Management Plan
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
FBiH	Federation of Bosnia and Herzegovina
FMOET	Federal Ministry of Environment and Tourism
GMP	Groundwater Monitoring Plan
JPAC	PC Motorways of the Federation of Bosnia and Herzegovina
LARF	Land Acquisition and Resettlement Framework
LARP	Land Acquisition and Resettlement Plan
LCO	Local Community Office
MCA	Multi-Criteria Analysis
NGO	Non-Governmental Organisation
PWC	Preliminary Water Consent
Q&A	Question and Answer
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan

1 Introduction

Project description

The European Bank for Reconstruction and Development ("EBRD") and the European Investment Bank ("EIB") are considering funding for the construction of a 35.26 km motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North in Bosnia and Herzegovina (the "Project"). This Project is part of the Trans-European Corridor Vc, linking Budapest, Hungary, to the Port of Ploce, Croatia, and is managed by the Public Company Motorways of the Federation of Bosnia and Herzegovina (the "Company" or "JPAC"). It plays a crucial role in connecting Northern Europe to the Adriatic Sea and expanding Bosnia and Herzegovina's participation in the European international roads network.

The Project is divided into three subsections:

- Konjic (Ovcari) - Prenj Tunnel = 11,500 m including Southern Connection to the Main Road M17 L=3,535 m
- Prenj Tunnel, L=10,936 m + 1,150 m of the route before the tunnel
- Prenj Tunnel - Mostar North, L=12,400 m.

The Konjic (Ovcari) - Prenj Tunnel - Mostar North section starts at the Ovcari interchange in the north, connecting to the existing main road M17. It passes through the Sipad industrial zone, crosses the Tresanica River via a viaduct, and goes through settlements Bijela, Gornja Bijela, and Mladeskovici. The motorway then traverses the Prenj Mountain via tunnels and viaducts, descends south through mountainous terrain with the Klenova Draga Tunnel and the viaduct over Badnjena Draga. Continuing northeast, it passes through the Podgorani settlement, crosses the Seocka Draga bridge, enters the tunnel under Sljemen, and reaches the Kuti area with the Mostar exit ramp.

The project also includes the South Connection to Main Road M17, known as the "Konjic Bypass", which extends from Ovcari interchange and passes through several settlements on the Neretva right bank, including Vrbici, Galjevo, Repovica, and Donje Selo before reaching M17.

Furthermore, there are access roads to the Prenj Tunnel, with the northern access road passing through Bijela and Gornja Bijela and the southern access road starting at the HP Investing interchange and passing through Prigradjani and Podgorani settlements, ultimately leading to the southern portal of the Prenj Tunnel.

The following figure shows the location of the entire subsection.

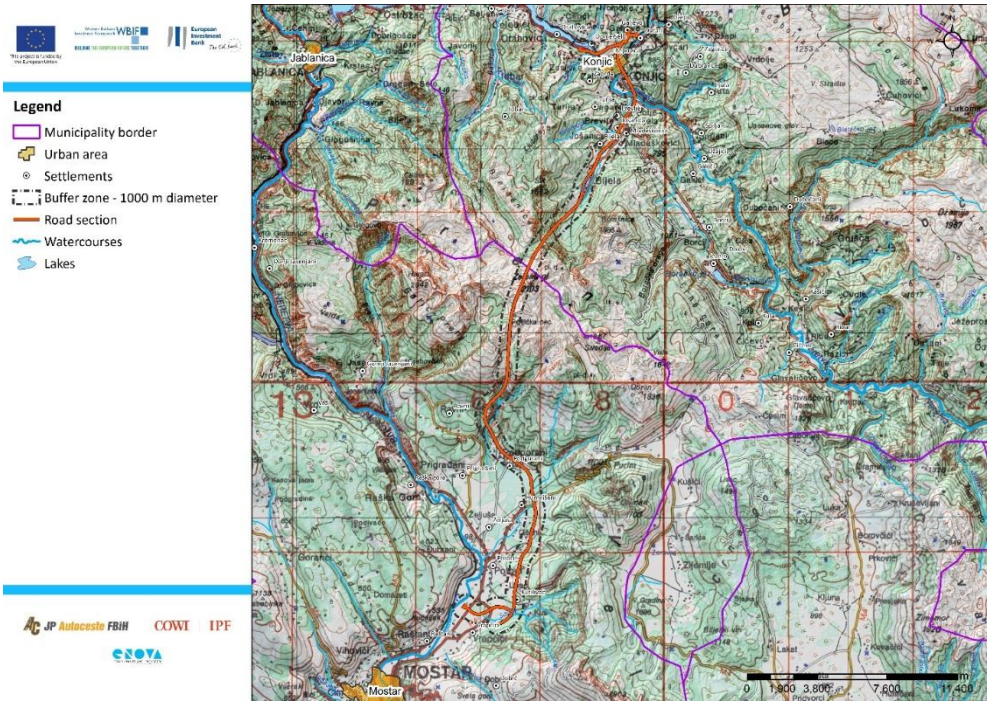

Figure 1: Project layout

ESIA/EIA process

When considering a project for financing, both EBRD and EIB mandate adherence to their respective Environmental and Social (E&S) policies and requirements. These requirements must be met in the development of the Environmental and Social Impact Assessment (ESIA) Study while simultaneously ensuring full compliance with applicable national legislation.

In accordance with the EBRD's Environmental and Social Policy (ESP), for Category A Projects, EBRD and JPAC must ensure that the Environmental and Social Impact Assessment (ESIA) documents are publicly accessible for a consultation period of at least 120 days. The policy also mandates the organisation of a public hearing.

According to the FBiH legislation, this Project is subject to the Environmental Impact Assessment (EIA) as defined in the *Law on Environmental Protection*[1]. The EIA procedure is carried out in 2 phases:

> Phase 1: Preliminary EIA (screening and scoping), and
> Phase 2: Development of EIA Study.

Both phases involve public consultations based on publicly disclosed documents and the organisation of a public hearing.

In response to the more stringent E&S criteria set forth by the lenders, the development of a comprehensive ESIA package, including the ESIA Study, was prioritized. Following initial approval of the ESIA package by the EBRD, the local

[1] Official Gazette of FBiH, no. 15/21

EIA was prepared in accordance with the provisions of national legislation based on the ESIA Study and its Appendices. The summary and timeline of the process followed is provided in the following figure.

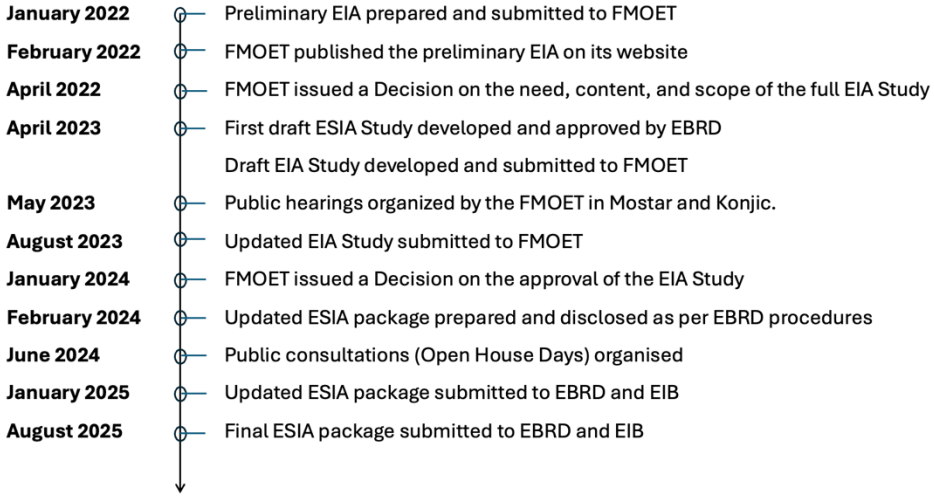

Figure 2: ESIA/EIA procedure timeline

About this Report

This Public Consultation Report provides a summary of the consultations that were undertaken as a part of the EIA and ESIA procedures and describes the key questions and discussion points that were raised in all phases including responses provided.

2 Consultations Under the FBiH EIA Regulation

2.1 Phase 1: Preliminary EIA

2.1.1 Consultation Process

The Preliminary EIA procedure lasted from February to April 2022. As part of this process, the Consultant prepared the *Request for Preliminary EIA*, which was made available to the public on the Federal Ministry of Environment and Tourism (FMOET) website on February 10, 2022, at the following link.

During the preliminary EIA procedure, feedback and inputs were collected from non-governmental organisations (NGOs) Aarhus Center BiH and Zeleni Neretva, Federal Ministry of Agriculture, Forestry and Water Management, Federal Ministry of Physical Planning and the Institute of the Protection of Monuments of the Federal Ministry of Culture and Sport. These organizations were directly invited to provide their comments on the Request for Preliminary EIA.

In the Question and Answers (Q&A) Matrix, the Study's author addressed queries from the interested public concerning the Project and the submitted documentation. The Consultant incorporated relevant recommendations and suggestions from the public into the EIA Study to enhance its comprehensiveness.

2.1.2 Key Questions and Discussion Points

The main topics discussed by stakeholders during this scoping phase included:

- The previous process of alignment selection and route alternatives,
- Hydrogeology and impact on water resources,
- Impact on biodiversity and protected areas in the alignment zone,
- Disposal of waste materials (spoil),
- Impacts on the soil,
- Socio-economic impacts,
- Impact on cultural-historical heritage.

Stakeholders primarily suggested the need for elaboration on these topics in the full EIA Study, and the consultant incorporated their suggestions into the Study development.

Details about the received comments are provided in the table below.

Table 1: Summary of questions and responses from the Q&A Matrix for Preliminary EIA phase

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
1.	Alignment selection and alternatives	NGOs expressed opinion that Environmental Impact Assessment (EIA) Study is required, but the	This EIA Study focuses on the route defined in the 2017 Spatial Plan for the Area of Special Interest to FBiH

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		process is premature. They argued that Spatial Plan for the FBiH - Motorway on Corridor Vc needs revision due to route changes made in 2016 without repeated public consultations. They stressed that legal requirements and the Aarhus Convention emphasise the importance of early public participation in environmental decision-making. The stakeholders argued that: › The full EIA Study must offer multiple project alternatives and provide a clear rationale for selecting the proposed option. › Based on the expected traffic volume, the Consultant should explore potential alternatives such as fast road and railway improvements. › It is premature to claim the planned route is the only option; if significant underground resources or endangered species habitats are found, adjustments may be needed. Even minor route changes might not suffice, so considering multiple alternatives is advisable for flexibility.	- Motorway on Corridor Vc. The consultant inquired with the Federal Ministry of Spatial Planning about the existence of public consultations before the plan's adoption. According to the ministry's response, public consultations were held in compliance with relevant laws, including one in Jablanica shortly before the plan's adoption. However, the consultant did not have access to the minutes or records from these public consultations. The Consultant was unable to evaluate additional alternatives since the route being assessed was established by the 2017 Spatial Plan for the Area of Special Interest to FBiH - Motorway on Corridor Vc, approved by the FBiH Parliament. All the alternatives considered in the process leading to the final alignment selection are thoroughly documented in the ESIA.
	Hydrogeology and impact on water resources	› How the hydrogeological research will be carried out? › Stakeholders suggested to consider speleological findings to timely identify underground water flows and assess underground biodiversity. › Stakeholders recognised that the complex hydrology in Prenj has not been thoroughly investigated, and it is unclear if such a study is possible; detailed data might only emerge during project execution, especially tunnel construction, which makes it challenging to anticipate and plan for potential construction-related impacts, including unforeseen situations.	In 2021-2022, Winner Project conducted tests to assess groundwater's influence on the Prenj Tunnel construction and its potential impact on water sources for public supply in Konjic, Jablanica, and Mostar. Dye-tracer tests were carried out at four locations: Jezerce, Jezero, Vrutak, and Veline Bare. The data and maps have been sourced from Winner Project's 2022 report. The Consultant also used speleological findings available for the caves in the area.
	Biodiversity and protected areas	Stakeholders have requested the full EIA Study to include the following: › flora, fauna, and habitats, including subterranean fauna. › research on the presence of the endangered and protected Munika Pine, particularly in the Rakov laz	The requests from stakeholders have been considered in the full EIA. Research on the flora has confirmed the presence of Munika Pine (*Pinus heldreichii*) in the Rakov laz area, and appropriate assessment of impacts and

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		area and the northern entrance of the Prenj tunnel. › assessment of Project suitability regarding the Emerald site and the potential Natura 2000 area Prenj-Cvrsnica-Cabulja, the Emerald/potential Natura 2000 area Zlatar, and the Emerald site in the Bijela Canyon. › the EIA study should clarify if the forests are in proposed Natura 2000 or Emerald areas. If they are, preservation is necessary, not compensation. If not, the study should identify native species and assess the potential for successful compensation. › the Dolomite area Vrtaljica near Konjic, part of state property, is designated for state protection in 1956 due to its rare flora. Despite the absence of a formal revision, the responsibility for the protected status of the Vrtaljica area remains with the relevant institution, as outlined in Article 19 of the Law on Nature Protection of FBiH. Considering the former protection status, it cannot be changed or damaged in any way without approval from the authorities.	mitigation measures for habitat revitalisation will be included. The assessment of the impact's acceptability on the ecological network in accordance with the EU Habitats Directive has been conducted for both the nominated Emerald areas and the potential Natura 2000 areas, regardless of their insufficiently defined status in the laws of the FBiH. As part of mitigation measures, the goal was to maximise the preservation of all habitats affected by the motorway's path. The quality of impacted natural habitats, especially those of high biodiversity significance and critical habitats, was assessed. Compensation magnitude and type were determined based on the size of the affected area.
	Waste and materials management	Stakeholders have requested the full EIA study to address these questions: › Where will the excavation material from the tunnel be deposited? (Apart from its potential use in construction, a significant portion is expected to require disposal.) › Where is the gravel sourced for road construction? Considering that illegal gravel extraction is a significant issue, the source of gravel should be precisely defined.	These suggestions have been taken in consideration in Chapters on Disposal sites, Borrow Pits and Waste and Material Management.
	Soil and land	Stakeholders requested to keep in mind the following: › the Law on Agricultural Land (O.G. of FBiH, No. 52/09) strictly regulates all land use changes, requiring the payment of fees and obtaining agricultural consent from the relevant cantonal administrative authority for any	The requests from stakeholders have been considered in the full EIA.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		conversion to non-agricultural purposes. › When using machinery, prioritise road use, select equipment with minimal impact on farmland, and take measures to prevent pollution from oil or fuel spills.	
	Socio-economic impacts	Stakeholder requested that the Study examine the potential effects on agriculture and tourism.	The requests from stakeholders have been considered in the full EIA.
	Cultural, historical, and archaeological heritage	The FBiH Institute of the Protection of Monuments of the Federal Ministry of Culture and Sport has reviewed submitted documents and found no objections to the current alignment in terms of its impact on cultural heritage during this stage of EIA preparation.	-

2.2 Phase 2: Development of EIA Study

2.2.1 Consultation Process

The consultation process in Phase 2 of the Federal EIA procedure included:

- Consultations during the development of the EIA study, involving online interviews and face-to-face meetings with relevant stakeholders.
- Consultations as part of the EIA Study approval process, which encompassed public disclosure of the EIA Study and public consultations.

Consultations During the Development of the EIA Study

Throughout 2021 and 2022, consultation meetings were organised with the:

- representatives of five Local Community Offices (LCOs) Centar, Dzepi, Bijela, Bijelo Polje and Tresanica (including its branch office Donje Selo).
- representatives of 15 non-governmental organisations (NGOs): Aarhus Centre, Bankwatch, Neretva Zeleni, NGO Dinarica, NGO Farmer, Fruit Growers Association Konjic, NGO Travel Konjic, Hunting Association Konjic, Sports Fisherman Organisation Konjic, Hunting Organisation Koznik, Mountain Bike Organisation Konjic, NGO Boj, Tourism Association Mostar North, Organisation of Fighters and Defenders of Konjic, and Association of Serb Returnees Neretva - Konjic.

The purpose of these consultations was to involve relevant stakeholders in the early stage of EIA development, provide them with information on the Project, obtain relevant information that can support development of the EIA Study and ask about their concerns and suggestions related to the Project.

Consultations as Part of the EIA Study Approval Procedure

The Federal EIA procedure began on April 10, 2023, with the submission of the EIA Study and the complementary Book of Technical Annexes. The EIA Study also addressed social issues as per the 2019 EBRD's Environmental and Social Policy. As part of this procedure, public hearings were organised by the FMOET in May 2023 in Mostar and Konjic. The purpose of these meetings was to present the findings of the EIA Study prepared for the Project and to allow individuals potentially affected by the Project to share their opinions and concerns regarding the construction of the motorway.

Prior to organisation of the public hearings, the EIA Study for this section prepared by the Consultant has been publicly disclosed:

- on the web page of JPAC (the access link to the EIA has been provided along with an invitation for the Public Hearings): link to the JPAC web page
- on the web page of FMOET on 24 April 2023. (the access link to the EIA has been provided along with an invitation for the Public Hearings): *[The link to the FMOET webpage is no longer active, as a new website was launched in 2025.]*

The hard copies of the EIA Study were made available on the following locations:

- JPAC offices in Mostar and Sarajevo,
- Administrative building of the FMOET in Sarajevo.

The organisation of the Public Hearings has been announced:

- on the web page of the FMOET on 24 April 2023: *[The link to the FMOET webpage is no longer active, as a new website was launched in 2025.]*
- on the web page of JPAC: link to the JPAC page
- on the web page of the City of Konjic: link to the City of Konjic web page
- on web portals:
  - Akta [link]
  - Fena [link]
  - Novi Konjic [link]
  - Ero [link]
  - Abras Media [link]
  - Bljesak [link]
  - Mostarski [link]

A direct invitation to the public hearing was sent by the FMOET to the NGOs Aarhus Centre and Zeleni Neretva, both of which participated with their comments in Phase 1: Preliminary EIA.

Public hearings were conducted on May 10, 2023, at the Mostar City Hall and on May 11, 2023, at the Konjic City Hall by the FMOET. The Consultant prepared a PowerPoint presentation and presented the EIA Study.

The number of participants at the Mostar hearing was 39, and in Konjic, it was 41.

Following the public hearing, the Ministry received three written public comments on the EIA study, which were consistent with the comments expressed during the public hearings.

Furthermore, in accordance with the EIA procedure outlined in the Law on Environmental Protection, the FMOET engaged an expert committee consisting of six independent experts to review and assess the quality of the EIA Study. After the review, the experts presented their comments and suggestions for the EIA Study's improvement.

The Consultant addressed all queries from the public and the expert committee in the Q&A Matrix and updated the EIA study based on their recommendations and suggestions.

Both the Matrix and the amended EIA Study were submitted to the Ministry on August 18, 2023. The Ministry shared the Q&A Matrix and the amended EIA Study with all the individuals and citizen groups that submitted written comments. The amended EIA study and accompanying Technical Annexes were publicly disclosed on the website of FMOET [link]. The extended Q&A Matrix is available in hard copy at JPAC and FMOET.

2.2.2 Key Questions and Discussion Points

Meetings with Local Communities

The key topics discussed during the meetings with local communities included water sources used by the local inhabitants, land use and traffic considerations, the livelihoods of the local population, their familiarity with the Project, and concerns about perceived Project risks and impacts.

Representatives of LCOs Centar, Dzepi, and Tresanica indicated that they had obtained all their information about the Project from publicly available sources and that no contacts with the Developer have been established.

The primary concerns expressed by LCO representatives were related to the drinking water source Bosnjaci, situated approximately 1 km from the motorway section alignment. These concerns centered around the potential impacts of the construction of Tunnel Orlov Kuk on this water source. Additional concerns included the interaction between the motorway section and existing local roads, the need for new connection roads where the existing local roads would be disrupted by the construction or cut by the motorway, and the impact of construction work, including potential traffic restrictions.

Meetings with NGOs

The NGOs expressed their willingness to support the Project's implementation but emphasised the importance of timely and precise information for local residents. The NGOs believe that the Project will have a positive impact on local communities by increasing the sales of local products, enhancing infrastructure, and attracting more tourists.

They have raised concerns about potential impacts on orchards used by fruit growers near the motorway section, beehives in the Bijela settlement, and potential negative effects on the Tresanica River and wildlife migrations. These concerns have been addressed in the EIA and its accompanying Environmental and Social Management Plan (ESMP).

Public Disclosure Including Public Hearings

The questions received in the Public Disclosure came in writing from the same group of interested stakeholders, covering the same topics discussed in both Public Hearings. The most frequently discussed topics include:

Social-related topics:

- Tailoring public engagement strategies, previously addressed in the SEP (Strategic Environmental Plan), which was not available in the national procedure.
- Preserving and safeguarding culturally significant sites.

- Addressing concerns raised by the local community, encompassing issues related to noise, dust, socio-economic impacts, safety risks associated with hazardous materials, traffic management, and adherence to regulatory requirements.

Biodiversity-related topics:

- Strong indications that the Ministry did not provide complete documentation to stakeholders, including the Biodiversity Management Plan, Critical Habitat Assessment, and Appropriate Assessment, despite these documents having been submitted. In response, the Consultant has requested that the Ministry publish Book 2 Technical Annexes along with the Q&A Matrix.

Water and hydrogeology-related topics:

- Incorporating the measures outlined in the Preliminary Water Consent (PWC) and the Studies on Water Protection Zones for Bosnjaci and Salakovac. Special attention was given to explaining whether mining activities are permitted within the III water protection zone, with a note that PWC was not accessible to committee members.
- The official adoption of the Studies on Water Protection Zones for all the springs affected by the Project, coupled with the formal adoption of the Decision on Protection.
- Addressing questions related to the specifics of the investigation works conducted. Many of these queries had already been addressed in the Study.

The panellists present at the Public Hearings who responded to the questions included a representative from the Federal Ministry of Environment and Tourism, a representative from JPAC, representatives from the designers of the Tunnel Prenj - Mostar North subsection, designers of the Konjic (Ovcari) - Tunnel Prenj subsection, designers of Tunnel Prenj, and representatives from the EIA Consultant.

The Minutes of the Public Hearings are provided in Appendix C and Appendix D.

The tables below summarise the questions and discussion points from the extended Q&A Matrix, along with the provided responses. The extended Q&A Matrix is available upon request.

Table 2: Summary of questions and responses from the Public Hearing

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
1.	Alternatives	- The public expresses a belief that the route could be more efficient by being shorter and passing through Zelenicka Draga. They have engaged in discussions with an engineer from Sarajevo who proposed an alternative route going uphill. Additionally, they oppose the current route because it directly passes over their homes.	The designer explains that elevating the road is not feasible due to specific technical constraints and spatial planning, as the road is required to descend from the portal to the Mostar North interchange.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
2.	Start of construction works	› Question for the Investor was if they know when will the construction works commence.	The answer to this question is given from the JPAC representative who stated that the commencement of the works will be in 2024.
3.	Land acquisition and resettlement	› There were questions regarding the completion date of the Main Design in order to precisely determine which parcels will be subject to expropriation.	The Designer stated that the Main Design is to be finished by the end of 2023.
4.	Land acquisition and resettlement	› The motorway intersects property of one participant, and this has raised concerns about the impact on property owners. Additionally, the representative feels inadequately informed and is wondering whether she has the legal right to withhold her property.	The JPAC representative explained the expropriation process, which only comes after the finalisation of the Main Design, expected to be completed by the end of 2023. Following this, the Expropriation Study will be prepared, determining the specific parcels to be expropriated. Subsequently, the local population will be thoroughly informed.
5.	Traffic management	› The representative of the City of Konjic highlighted the town's unique situation, with the road coming very close to the city centre, which has led to issues with on and off-ramps. They are actively working with JPAC to find collaborative solutions but express concerns about access and the need to minimise adverse impacts. Particularly, they emphasise that enduring years of construction without proper connections is unacceptable.	The representative from JPAC answered that they all together are actively working on finding the best solution to this situation.
6.	Water sources	› Concerns were raised about the Crna Vrela water source, seeking assurances against water scarcity, inquiries into the route's distance, contingency plans for water supply interruptions, and the handling of wastewater from the Prenj tunnel. › During the public hearing the Consultant brought up the fact that historical data on hydrogeology was used by an expert for research, and our region relies on the Bosnjaci spring to supply Mostar. The question arises: Is depending solely on these older literary records adequate? Have there been any groundwater assessments conducted in the past five years? A key concern is whether the proposed route will have any impact on the groundwater in this area and what	› In the Preliminary Design a retaining wall is envisaged in order to minimise any impact on the water source. The Designer also explained the handling of the wastewater with closed wastewater treatment system that is foreseen for the motorway construction and operation. › The Consultant clarified that there might be turbidity issues following intense rainfall or rapid snowmelt. Comprehensive research has been carried out in this regard. Additionally, the Designer presents technical solutions, including the complete isolation of water collected from the road to prevent external contamination and thorough purification processes. Furthermore, water tanks are planned at the tunnel exits.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		that impact might entail, given the critical importance of the Bosnjaci spring to the residents of Mostar. Representative of one NGO recommends that the investor explore alternative options with regard to the project's proximity to the Bosnjaci spring. The prospect of a water supply interruption is unacceptable. › The source of Klenovik is located in Klenova Draga, and water from Klenovik reaches Prigradjani. Tracer or other tests have been conducted to confirm this. Local residents are concerned about the possibility of contamination and its potential link to Salakovac. › The participant was interested in information regarding how the construction of the motorway will impact Boracko Lake.	› The Consultant clarified that based on hydrogeological research there was no evidence that the Klenovik is connected to the Salakovac water source. › The Consultant stated that there will be no impacts on Boracko Lake as it is out of the Project area influence.
7.	Biodiversity	The representatives of one NGO asked why underground fauna research has not been conducted.	The Consultant explained that it was considered but not deemed relevant at this stage, only after the caverns inside the mountain are opened
8.	Protected areas	The attendees raised a question regarding Natura 2000, the Emerald areas, and Prenj as a potential national park, and how these aspects are addressed in the Study.	The Consultant explained that all these areas have been included in the Study. All the mentioned areas of concern have been treated as potential or proclaimed even though some of the areas in question do not have strong legal foundations. It was explained this was performed in order to facilitate impact identification and assessment, and Appropriate Assessment was prepared in order to bring the project in line with EBRD, EU and, ultimately, national requirements.
9.	Waste and materials management	› The public inquiry concerns the transportation of materials and specifically asks if it will involve local roads passing through the settlement. › Public concern revolves around the potential disruption of stormwater drainage caused by the Humilisani landfill, primarily due to the accumulation of water in its upper section.	› The Designer responded that local roads will indeed be utilised for the material transport. › The Designer assured the public that the landfill design incorporates water passages and the establishment of drainage channels. Moreover, the water will continue to be drained and discharged even after passing through these channels.

Table 3: Summary of questions and responses from the Public Disclosure

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
1.	Previous public consultation meetings	The 2017 amended Spatial Plan for Corridor Vc in the FBiH, which determined the motorway's route, lacks official records of consultative meetings, raising concerns about the transparency and public participation, which is a fundamental principle emphasised in the Aarhus Convention.	The Study was prepared for the route determined by the Spatial Plan for the Area of Special Interest to FBiH - Motorway on Corridor Vc. In response to inquiries about the plan's adoption, the Federal Ministry of Spatial Planning cited that several public discussions were held. The route for the "Motorway on Corridor Vc", section Konjic (Ovcari) - Prenj Tunnel - Mostar North, was the result of an analysis by JPAC and adopted by the Government of FBiH, subsequently integrated into the Draft Spatial Plan and approved by the FBiH Parliament, which was noted as a decision rather than a record. All other questions related to the route selection process can be directed to the relevant ministries: the Federal Ministry of Spatial Planning and the Federal Ministry of Transport and Communications.
2.	Consultations conducted as part of project preparation	› Consultations with local community offices in 2021 and 2022 highlighted a lack of information from authorities. The Aarhus Convention's Article 2 underscores the importance of early, comprehensive, and accessible public information, emphasising the need to reach vulnerable groups and provide specific details about the project's route and activities to the local population and NGOs. › Request to actively engage local communities from the project's inception, ensuring open, transparent, and inclusive participation, in accordance with the Aarhus Convention, which promotes environmental democracy and the involvement of citizens and civil society organisations in environmental policies. › The consultations with vulnerable groups, such as women and returnees, were limited in scope, and gender-specific data were not collected, despite the presence of female-headed households and the potential impact on women's lives, including concerns about dust during construction and its effect on water sources.	In line with the requirements of international financial institutions like the EBRD and EIB, a Stakeholder Engagement Plan (SEP) has been prepared alongside the EIA. The SEP outlines the identification of relevant stakeholders, their engagement throughout the project's lifecycle, and continuous updates to the stakeholder list and activities. Special efforts are made to involve vulnerable groups, including the elderly, individuals with illnesses or disabilities, and low-income families, with tailored communication channels and convenient meeting schedules to ensure their active participation in consultation activities. This plan delineates the necessary actions for involving and promptly informing all stakeholders. The SEP highlights the importance of engaging and considering the perspectives of these vulnerable groups throughout the Project's planning and implementation. It also suggests tailored communication channels, small group or individual meetings, and other measures to ensure the full participation of vulnerable individuals in consultations. The Study has also been supplemented with recent data from the Federal Institute of Statistics.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		› Additionally, recent data from the Federal Institute of Statistics on the extent of population outflow after the 2013 Census should be included in the section on demographics.	
3.	Cultural, historical, and archaeological heritage	› The concern pertains to the presence of culturally and religiously significant heritage sites, including medieval tombstones, along the motorway construction route, with a specific focus on their location, proximity to nearby villages, potential impacts from construction-related noise and vibrations, and the protective measures planned for these monuments. › The Consultant noted the discovery of six additional properties during the Study's preparation, with four situated near the motorway route and two near the Konjic Bypass. Stakeholders requested clarification on the identity of these properties and whether they have been reported to the appropriate protection authorities for registration, as this aligns with the legal obligation when encountering such sites. › It is emphasised that the legal framework for the protection of national monuments indicates that specific protection measures are associated with properties declared as national monument. The Consultant is advised to contact relevant institutes for non-declared monuments.	› The EIA included a comprehensive assessment of cultural heritage sites, and as an extra precaution, an archaeologist will be present during the pre-construction phase to thoroughly explore the sites. Vibration modelling also indicated minimal impact on physical structures from vibrations caused by construction activities. › The Study text doesn't assert that the identified objects are protected; instead, they are recognised as religious and cultural objects of significance to the community, following the EBRD methodology. They are listed as the Muslim cemetery Kuti near the motorway, the Orthodox cemetery in the Mladeskovici settlement, the Orthodox church "Holy Sunday – Bijela", the "Bijela" mosque in the Bijela settlement, along with a mosque and an Orthodox cemetery in the Donje Selo settlement. › JPAC has sought expert opinions from relevant institutes regarding cultural-historical properties, and their responses have been integrated into the Study in the same chapter.
4.	Community H&S	› The Study lacks clarity in explaining how vulnerability criteria were applied to assess households as vulnerable and how the contractor plans to address these concerns. › While there are no formal restrictions on women's involvement in construction work, efforts are needed to promote gender-neutral employment, ensure equal pay, and create a safe work environment free from harassment and discrimination. These measures are crucial to prevent gender-based violence, especially with an increased influx of predominantly male laborers. Practical implementation to achieve these goals is essential for ensuring a safe and	› The Study explains the vulnerability criteria in detail, following the EBRD ESP from 2019, which considers characteristics like age, disabilities, and social status. It lists criteria such as household composition, ethnic background, and health status, identifying those below the poverty line, single-parent households, and displaced persons as vulnerable. The research found a significant number of households with members having chronic illnesses, disabilities, or elderly individuals living alone. › Chapter 6.2 of the plan outlines a Work Plan that offers local employment opportunities while addressing gender-based violence and harassment. This plan includes guidelines to ensure transparency, equal opportunities, and non-discrimination in hiring, although the exact number of job openings is still unknown. To address gender-

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		equitable work environment. How this will be achieved in practice? › Bow the issue of barriers towards the shooting range will be addressed in context of traffic safety?	based violence and sexual harassment, contractors are required to develop a Code of Conduct for workers, prominently displayed at project sites and vehicles. Workers must confirm their understanding by initialling the code before starting work, with disciplinary actions outlined for non-compliance. The contractors will also conduct informational campaigns to educate their workforce about the code and cooperate with law enforcement agencies to investigate complaints if necessary. › Following discussions with Igman, the Municipality of Konjic will initiate the process of obtaining a Declaration of Public Interest for relocating the existing outdoor shooting range in Rakov Laz to a new site. The designer will create the Preliminary Design for the new range, and Geo-Biro company is preparing an expropriation report for it. In the ESMP, a new measure (6.2.2.1) has been introduced, mandating the investor to secure approvals and permits from relevant authorities and, if necessary, install barriers to ensure traffic safety concerning the shooting range.
5.	Local roads and infrastructure	The existing road network in the Project area includes access roads, local roads, unpaved routes, and pedestrian paths linking local communities to the M17 and two regional roads. During construction, there will be increased local traffic due to the transportation of construction materials and disposal of excavated soil, with temporary access restrictions likely. Pedestrian sidewalks and protective measures for increased construction traffic are not specified. The impact on school bus operations and public transportation lines is not detailed, and there's uncertainty about whether existing bus stops will be relocated, or new ones built. How will this be addressed, and what impact is expected on the local communities?	Chapter 6.2.1 includes a requirement for the Contractor to prepare and implement a Traffic Management Plan (TMP) before commencing Project execution. The TMP will encompass measures for traffic management to address potential impacts on local traffic, such as road damage, traffic congestion, and access restrictions. It will consider the phasing of work to ensure the preservation of local access, including public transportation. The Contractor will be responsible for implementing the TMP, and it will be reviewed at least weekly during construction activities. The TMP will be documented as part of the ESMP, and a record of complaints related to access restrictions and road damage will be maintained. Additionally, the TMP will include measures to identify and address significant hazards affecting worker and community safety, ensuring safe and efficient traffic flow with a focus on protecting both workers and the local population from potential risks.
6.	Land acquisition, land use restrictions, and involuntary resettlement	The Project will involve land acquisition and resettlement, potentially impacting households and businesses. Could you explain how this will be managed, especially regarding compensation for losses and temporary land occupation during construction?	The LARF outlines general principles, procedures, and rights related to potential land acquisition and resettlement impacts for the project, aligning with applicable legislation in the FBiH and international standards, including EBRD PR 5, and EIB Standards 6 and 7. This framework also addresses methods of information dissemination, responsibilities for expropriation implementation, and an appeals mechanism for the project.

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		The process of informing local communities about land acquisition and resettlement options, as well as the responsible parties and appeal mechanisms, should be clarified.	For more details, please refer to Chapter 5.3.5 in the report titled "Land Acquisition, Land Use Restrictions, and Involuntary Resettlement".
7.	Cumulative impacts	The Consultant was informed that in October 2023, representatives from Aarhus centre Bosnia and Herzegovina and CEE Bankwatch Network visited local communities near the planned motorway route in the northern part of Mostar, particularly around the area of Kuti, near the northern exit ramp of Mostar. Local residents expressed concerns about the unresolved issues surrounding the Uborak waste disposal site, located approximately 1 km west from the exit ramp, highlighting how uncontrolled plastic bags carried by air currents and the presence of birds attracted to exposed waste could pose safety risks to the future motorway exit.	The Uborak landfill was excluded from the study since it falls outside the Project's impact area. Its connection to the motorway was assessed in the EIA Study for the Mostar North-Mostar South section, specifically in the context of cumulative impact assessment.
8.	Biodiversity	The EIA Study lacks information regarding the potential installation of noise barriers in rural areas, particularly in the Rakov Laz area, to mitigate the impact of noise on wildlife, despite acknowledging that this area is a habitat for various animal species.	After considering the feedback, the authors of the Study consulted with biodiversity experts. They found that the trees and shrubs along the motorway already provide noise reduction in the Rakov Laz area. Using traditional noise barriers could be problematic, especially in areas with embankments, potentially causing bird collisions, so they might not be suitable in all cases. Furthermore, the planned embankments in Rakov Laz are in low-quality habitats and are not expected to have a significant impact on biodiversity, so constructing noise barriers, as suggested, is not recommended.
9.	Waste and materials management	There's a need for clarity on the exact disposal locations and whether these will be permanent or used in embankments. Furthermore, the Konjic City landfill has limited capacity, making it unsuitable for depositing even a fraction of the expected excess material from the Konjic Bypass. Therefore, clarification is needed regarding alternative disposal locations or a plan for addressing this issue. The omission of borrow pits and their locations in the EIA is also a significant concern.	The Study reports a total excavation quantity of approx. 6.9 million m^3. Out of this, around 3.4 million m3 is needed for embankment construction along the route, leaving a final disposal requirement of 3.5 million m^3. To manage this, sections are designated for depositing tunnel excavation material. The municipal landfill in Konjic will handle 160,000 m^3 of waste from the Konjic Bypass as per request of local self- government, while the Humilisani disposal site can accommodate 2,800,000 m^3 of material from various construction areas. Additionally, borrow pits will be used for road asphalt needs, with existing licensed quarries located in the northern part of the section, avoiding protected areas and water zones. The contractor will be responsible for selecting the source of such material under conditions given in the Study. However, it is not common practice for a contractor to open a new borrow pit; rather, they typically purchase material from existing sources of aggregate material. However, if the

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			contractor decides to open a borrow pit, they will be required to undergo the national EIA screening procedure and obtain a relevant environmental decision, separate from the motorway construction project.
10.	Protected areas	The question raises concerns about the potential impact of the motorway on the Vrtaljica area, previously designated as a "special botanical reserve", and suggests implementing mitigation measures and noise barriers.	It is noted that the Vrtaljica area is treated as protected under the Law on Nature Protection of FBiH, even though it lacks practical protection. Special attention has been given to the Zlatar area, which was declared a "special botanical reserve" in 1956, and measures are outlined in the Study and the Biodiversity Management Plan to minimise and compensate for the negative impacts. Additionally, avoidance measures for construction-related borrow pits within proposed Natura 2000 areas or candidates for the Emerald network, including Zlatar/Vrtaljica, are in place, and noise barriers are already planned for specific areas within the Zlatar-Vrtaljica zone.
11.	Protected areas	The question inquires about the timing of proposing mitigation measures for two potential Emerald areas (Zlatar and the Konjicka Bijela canyon) within the ESMP and BMP, and whether these measures will be developed before the Main Design or based on the Conceptual Design. It also asks about plans for "artificial" wildlife crossings in these areas, particularly at the Rakov Laz location.	The proposed measures, including relocating disposal sites and avoiding construction within sensitive areas, were initially introduced during the Conceptual Design phase and are intended for the pre-construction phase. Specific changes and requirements will be incorporated into the Main Project, which is binding for designers. It is also noted that artificial crossings for large mammals in Rakov Laz are unnecessary, as natural passages for wildlife are created by the terrain's dynamics and the construction of infrastructure like bridges, tunnels, and viaducts. Additional passages for reptiles and amphibians will be provided at various locations along the route as part of the measures.
12.	Hydrogeology	The question raises concern about the limitations in the methods used to investigate the ground water connection, particularly the inadequacy of dye tracing in sinkholes, which were sampled at only four locations on the Prenj high plateau, failing to provide a comprehensive view of the area's hydrological conditions. The Study did not take into account the karst phenomenon of "delayed waters. This process involves the accumulation of winter and spring precipitation deep within the Prenj underground, which is released during the summer, nourishing springs, and watercourses at the mountain's base.	The Study relies on reports prepared by Winner Project Sarajevo, authored by Prof. Dr. Mirza Basagic and Omer Bedak, B.Sc. in Geology, including a June 2021 report on detailed geological, engineering geological, geotechnical, geophysical, and hydrogeological research. The research concept is based on existing knowledge of geological, hydrogeological, engineering geological, and geotechnical conditions in the Prenj tunnel corridor. Decades of research in the area began in the mid-20th century for dam and reservoir design in the Neretva River basin. Initial data on the terrain's geological structure and tectonics came from the Basic Geological Map, Mostar Sheet, M 1:100,000, along with investigations for previous Corridor Vc alternatives and the Preliminary Geotechnical Study from Mission G1. The Study details the research and

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			testing needed for the Project, conducted in phases, with each phase built upon previous results. Some tests were repeated for accuracy. To mitigate potential impacts on surface and groundwater, especially springs supplying water to Konjic, Jablanica, and Mostar, groundwater flow tracing was planned for low and high-water levels. Dye injection points were chosen in the tunnel corridor, and a monitoring network tracked dye appearance at discharge points, including Jezerce, Jezero, Vrutak, and Veline bare. Sampling occurred at various intervals until dye appeared or was excluded, ensuring monitoring accuracy. Local authorities, agencies, and communities were informed before each groundwater tracing operation, emphasising the harmless nature and short duration of any green dye appearing in watercourses or springs. The phenomenon of "delayed waters" wasn't part of the methodology but is presumed that relevant institutions would report any dye appearance at springs since they were informed about the research.
13.	Water Sources	Concerning the protection of unnamed water spring in the area of Konjicka Bijela, will the designer plan to construct a wall or a bridge instead of an open route to protect this spring?	In the Preliminary Design, which was completed after the public hearing for this Study, a retaining wall is envisaged and designed.

Table 4: Summary of questions and responses from the FMOET Expert Committee

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
1.	Analysis of alternatives	› During the project development phase, 7 route alternatives were considered, but their ecological impacts were not explained, nor does the Study show that ecological impacts were included as criteria for selecting the most suitable route. Additionally, no alternative solutions related to ecological impacts and consequences were considered for the selected route, which passes through ecologically sensitive and vulnerable areas to comply with requirements for biodiversity avoidance and priority protection. › The environmental impacts in the "no-project" scenario were not considered in relation to the proposed project.	› The 2006 Multi-criteria Analysis (MCA) evaluated the ecological impact of all 7 alternatives and identified the route passing through the Prenj Tunnel as the most favourable. Based on the MCA results, a *Spatial Plan for the Area of Special Interest to FBiH - Motorway on the Corridor Vc* was adopted. This Study focused on addressing all potential impacts that may arise along the route defined by the Spatial Plan. › The "no-project" alternative does not have environmental impacts because, in that case, there is no motorway route in the environment. The Consultant believes that this Study has addressed the question of comparing the environmental impacts of the proposed project with the "no-project" alternative.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)

2.	Project risks	› Possibility of appearance of geological gases like CO_2, H_2S, CH_4, etc. in the Prenj Tunnel.
		› Risk of significant groundwater inflow during the excavation of the Prenj tunnel
			› Considering the ongoing development of the Preliminary Design with elements of the Main Design for the Prenj Tunnel construction, the designer gave following information:
			  › CO_2 levels in the tunnel environment are extremely small and negligible compared to vehicle emissions.
			  › There is no presence of organic materials or volcanic activity, so H_2S is not a concern during construction and operation.
			  › Methane (CH_4) levels are monitored at excavation sites, and protocols are in place for its safe management. Measurements so far indicate minimal methane levels, similar to the experience at the Karavanke Tunnel in Slovenia.
			› The Study proposed adequate protection measures against the potential high water inflow, mainly related to the method of drilling execution. The detailed method of work will be provided in the Main Design, which is currently in under development.

3.	Social issues	› Question regarding employment or the increase/reduction in the number of employees during construction. › In section on Health and Safety Risks for Workers, risks for tunnel construction workers are listed. In addition to the ones mentioned, it is necessary to add the risk of geological and non-geological gas exposure. › The Project has the potential to trigger conflicts with established land use practices, particularly for 1,082.6 hectares directly impacted by it. Approximately 76% of the Project is slated for construction on forest land, while 20% is allocated for agricultural use, excluding the tunnel structures. These areas are slated for permanent loss due to the construction of the motorway. It's important to note that the assessment has not taken into account potential land use conflicts within potentially protected areas, candidate sites for the Emerald Network, and habitats that necessitate usage restrictions and priority protection.	› In the ESMP, there are measures outlined for a work and employment plan to provide opportunities for employing local residents within the Project. Criteria for employee selection will include minimum age and skill requirements for specific job positions, and all job advertisements will clearly specify the necessary skills and experience required for the job, as well as the duration of employment contracts. However, the specific number of jobs to be created is not known. › Additional risks from geological and non-geological gases have been included in the Study. › A Land Acquisition and Resettlement Framework (LARF) has been formulated, emphasising the necessity for a comprehensive Land Acquisition and Resettlement Plan (LARP). This plan, incorporating socio-economic research and a population census, will be devised subsequent to the completion of the Main Designs, detailing the budget, timeline, and monitoring period. Serving as the cornerstone, the LARF will guide the development of detailed LARPs and Expropriation Studies, providing precise information on land acquisition and resettlement based on Project documentation. LARPs will be crafted when the precise dimensions of land acquisition or land use

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		› The number of people and businesses to be relocated is not specified. The development of Land Acquisition and Resettlement Plans (LARP) is proposed. ›	restrictions pertaining to the Project become known. These plans are designed to alleviate and minimise the impacts associated with land acquisition, land use restrictions, and involuntary resettlement within specific segments of the Project. › The existing land use conflicts concerning potential protected areas and candidates for the Emerald Network remain unresolved due to pending declarations and uncertainties in protection zones and management models. Zoning and activities within these areas are contingent upon declaration acts and technical documents, where strict protection, active protection, utilisation, and transitional zones play pivotal roles in preserving biodiversity. IFI environmental and social policies delineate priority biodiversity features and critical habitats. To address impacts, a mitigation hierarchy (avoidance, minimisation, mitigation, and compensation) will be implemented, guided by the Biodiversity Management Plan (BMP) when avoidance is not feasible.
4.	Biodiversity	› The worst-case scenarios for biodiversity loss, particularly in priority and critical habitats, migratory routes, and cases involving endangered and protected species, remain inadequately described due to insufficient data and unknown protected area boundaries within the affected zone. › The EIA Study does not consider the potential for mitigating the consequences at locations where harmful impacts occur on any part of the environment. It particularly overlooks the potential for mitigating the impacts on biodiversity within the Project area, despite it being a highly ecologically sensitive and vulnerable area. Therefore, specific, site-appropriate measures are needed to ensure effective protection of biodiversity, given the inadequacies in the EIA's proposed measures. › The reasons for choosing specific mitigation measures are primarily explained for the measures listed in the ESMP, which should be supplemented with additional specific measures and indicators. › The monitoring plan is provided and explained in the Study for all areas but needs to be supplemented with the	› In the Project area, there are no significant populations of endangered species, and measures are in place to relocate such species if found during construction to comply with protection regulations, including worker training and the engagement of a biodiversity expert. Additionally, traditional migrations are absent in the area, and the motorway won't disrupt recognised and potentially protected habitats of large predators like wolves and bears. › The importance of the area has been recognised, and a separate set of documents has been prepared, included as Book 2: Technical Annexes, containing ten annexes related to biodiversity, including the Biodiversity Management Plan. In this Plan, measures are explained more clearly, defined within the mitigation hierarchy. These measures cover avoidance (some already implemented in collaboration with project designers), mitigation (e.g., habitat revitalisation), and compensation (support for adopting Emerald areas and Federation-level protection). › The targeted measures for significant habitats and species are presented in the documents Biodiversity Management Plan and Critical Habitat Assessment, which are attached as part of Book 2: Technical Annexes. The Biodiversity Management Plan also provides more

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		monitoring of aquatic fauna, monitoring of Project areas immediately before construction to determine potential colonisation by protected species and take relocation and protection measures, the status and changes in priority habitats, conservation sites, and protected areas, as well as assessing the consequences and achieved effects, especially in restoration areas. Additionally, it should reconsider the monitoring schedule (whether weekly monitoring is necessary during construction and use for all types of monitoring). There is no provision for informing about subsequently identified significant occurrences and changes related to biodiversity and protected areas.	detailed descriptions of key indicators for measuring the success of specific measures, which are measurable and tangible. › Engaged experts consider the detailed research in the Study sufficient and reliable, with additional research mandated by ESMP measure for targeted groups and species. The Study acknowledges the possibility of habitat changes and outlines additional research before construction, if construction starts three years after detailed research completion. As part of the Project, the Consultant has created a Stakeholder Engagement Plan (SEP) to inform all stakeholders, including vulnerable groups, about various Project aspects, such as the environment and community safety, including biodiversity and protected areas.
5.	Protected areas	Most of the data is presented in the EIA Study, but there is a lack of summary information on the positions of potentially protected areas (Zlatar and Prenj-Cvrsnica-Cabulja) and two candidates for the Emerald Network area (Zlatar and Konjicka Bijela), as well as identified priority habitats, critical habitats, and priority biodiversity features (terrestrial and aquatic) concerning the Project area, which require usage restrictions and priority protection. This lack of clarity makes it difficult to assess conflicts, necessary restrictions, and priority conservation measures for areas requiring avoidance, limitations, and protection in accordance with spatial planning documents and the provisions of the Nature Protection Law, Water Law, Environmental Protection Law, and implementing regulations.	The location of each identified priority biodiversity feature and critical habitat is provided in a separate Annex D to the Study. The location concerning candidate Emerald Network areas has already been shown for the Konjic (Ovcari) - Prenj Tunnel subsection. In Chapter 3.3, a map displaying the motorway's position relative to the Zlatar-Vrtaljica Special Purpose Area and the potential Prenj National Park has been added. The map indicates the location in relation to the Konjic (Ovcari) - Prenj Tunnel subsection because it is a relevant part of the route requiring revision. Additionally, new enlarged maps, providing a clearer depiction of the route's position in relation to potential Natura 2000 areas, have been inserted into the Study.
6.	Hydrogeology and Groundwater	› Geotechnical surveys have not been conducted to the extent required. Continuous research of the project area is required after the start of construction work, particularly in the fields of hydrology and hydrogeology. › Additional research is needed to address the protection of the Bosnjaci Springs and Salakovac Springs. › The Study discusses groundwater flow directions based on dye tracing experiments conducted by Winner Project d.o.o. between 2021 and 2022 at several sinkholes. The Study	› This ESIA was developed based on the Preliminary Design and accompanying preliminary geotechnical investigation, so called mission G1. Further geotechnical investigations are planned in the phase of the Main Design, so called mission G21. › The hydrogeological analysis which considered recent dye tests and other data, identifies potential impacts on springs supplying water to Mostar. The Study examines potential water quality impacts and mitigation measures. It relies on protection zones defined in the Studies on Protection of Bosnjaci and Salakovac Springs, prepared by

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		lacks a critical assessment of why not all relevant springs and wells were observed and fails to provide information on the quantity of dye discharged at the springs. › The Hydrogeological Map is poorly visible, and it only displays major springs like Salakovac, Bosnjaci, and Livcina. Please include the other springs mentioned in the text and present the map in its original scale (1:100,000). If possible, on this or another map, it would be beneficial to depict all springs and wells used for water supply purposes, as well as other water features and structures. Additionally, indicate sinkholes, ponors, and estavelles on the map. Include both confirmed (older and from 2021-2022) and assumed water connections on the map. › The Study discusses geophysical investigations for the Prenj Tunnel's geotechnical conditions and karstification depth but omits details on the conducting entity and specific locations, hindering verification. Assuming a karstification depth of 150-250 m below the ground surface, the Study suggests minimal groundwater risks during tunnel construction. However, the lack of concrete evidence, coupled with examples of deeper Dinaric karst formations and groundwater flow, challenges these assumptions. Caution is advised in assuming minimal groundwater intrusion risks during the development of the Main Project for the motorway and the Prenj Tunnel in Herzegovinian karst terrains. › To mitigate the impact on groundwater, surface water, and water supply, the proposal includes the **daily** presence of a hydrogeologist on all motorway construction sites, particularly during tunnel construction. Furthermore, the Groundwater Monitoring Plan (GMP), recommended to mitigate groundwater impacts should be coordinated with the Surface Water Monitoring Plan, and they can potentially be integrated into a single plan if separate plans are maintained.	the Institute for Water Sarajevo in December 2022. In addition to recent dye tests conducted by Winner Project d.o.o. Sarajevo, a groundwater vulnerability and pollution hazard assessment was performed using data from the latest Studies on Protection of Bosnjaci and Salakovac Springs. It should be noted that the connection of the Project area to these two springs has been proven by dye testing, so no more research is needed. What is needed is to to implement all measures of good construction practice prescribed in this Study, as well as in the Preliminary Water Consent and the Water Permit to be issued in later phases. › The ESIA Consultant relied entirely on data from the Winner Project report for the conducted dye tracing experiments and their accompanying maps, as the Study's author didn't critically review the work, assuming the company's credibility and licenses for this type of reseach and analysis. › The names and labels of mentioned springs and water features have been rectified in the Study, but due to unavailability of the Cadastre, some features are missing from the map, originally created at 1:100,000 scale but adapted for the Study format, making it difficult to read. However, the Consultant provided a correctly scaled map with a high-resolution PDF version as an Annex to the Study. The Hydrogeological Map is based on previous Project research and field surveys, including data from the Winner Project, Institute for Water Management reports, and other referenced documentation. › For the purposes of developing the Main Design, additional detailed investigations will be conducted, which will significantly clarify uncertainties regarding the rock mass porosity and groundwater levels in the Prenj Tunnel route zone. These new additional investigations will undoubtedly contribute to a more detailed and clearer representation of the relevant issues. Until then, reliance must be placed on the available data. › The term “continuous” has been changed to “daily” for the hydrogeologist's presence. The ESMP specify parameters, methods, limits, frequency, locations, and monitoring responsibilities. In the pre-construction phase the ESMP anticipate baseline monitoring of the water quality of the Neretva, Tresanica, and Konjicka Bijela rivers.

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		› The Study discusses the location of Salakovac Spring and its relationship to Prenj Massif groundwater, suggesting minimal tunnel construction impact due to spring elevation, despite earlier assumptions about karstification depth. Contradictions arise regarding the tunnel's position relative to the karstification base, raising inconsistencies. To address these discrepancies, it is recommended that the Study proposes a comprehensive geological and hydrogeological research project for the motorway section, offering a more accurate understanding of the terrain, groundwater levels, lithostratigraphic units for tunnel construction, and specific measures to minimise impacts on underground and surface waters in critical areas such as Konjicka Bijela, Bosnjaci, and Salakovac.	› The tunnel is not beneath impermeable rocks; instead, it's in a karstified area with fractured limestone and occasional dolomite. Karstification decreases with depth, leading to a network of channels and fissures near the surface for groundwater flow. Deeper down, these channels dominate and often follow fault zones, making fault zones potential sites for groundwater during tunnel excavation. While the engineering insights are valuable, the trade-off between cost and time presents a challenge. Comprehensive hydrogeological investigations for the Prenj Tunnel would require significant time and financial investment. The choice between obtaining more detailed data before construction or relying on established tunnel construction methods for various geological and hydrogeological conditions rests with the investor, and regional hydrogeological experts suggest the latter option is more time and cost-effective in this case.
		› The document presents a predictive hydrogeological profile for the future Prenj Tunnel route, lacking specific data sources and details on assumed minimum and maximum groundwater levels. The model suggests minimal groundwater inflow during tunnel excavation, particularly in the main fault zone during heavy rainfall or snowmelt. Emphasising that it's a predictive profile based on a basic geological map, the document urges consideration of potential terrain complexity and recommends input from experienced geologists and palaeontologists. The ESIA Study recommends a site visit to document hydrogeological phenomena in the motorway construction area, particularly in the Bjelasnica hydrogeological region, and stresses the importance of establishing a register with baseline conditions before work begins. Additionally, it highlights the availability of a new Underground Waters Register, offering valuable data accessible through the Agency for the Adriatic Sea Watershed, covering Mostar, Konjic, and Jablanica municipalities in GIS format.	› The hydrogeological profile in the Study is based on a 1:100,000 basic geological map supplemented with Study-specific data, lacking groundwater level information due to lack of exploratory work such as boreholes and piezometers. The author recognises the actual profile's complexity but notes the limited data availability, making this profile a valuable reference. While the Study's hydrogeological section didn't have access to the Underground Waters Register, the data from this source can enhance understanding of geological and hydrogeological relationships in the area, though it may not offer detailed information about groundwater levels along the future Prenj Tunnel route.
			› The ESMP includes a mandatory measure for a detailed well survey, requiring the use of the Cadastre of Groundwater in FBiH in the pre-construction phase to identify public water supply wells, individual water supply wells, and newly constructed wells.
		› The Cadastre of Groundwater in the FBiH, which is available to the relevant Adriatic Sea Watershed Agency, was not used, and individual water supply wells were not considered.	› The Study indeed does not present analyses of the quality of water sources used for drinking purposes. These data, held by water supply companies, are not publicly available, but it is safe to assume that, given their use for drinking, the water quality meets the standards prescribed by the Regulation on the Health Safety of Drinking Water (Official Gazette of BiH, No. 40/10, 43/10, 30/12).
			› The assessment of groundwater vulnerability was taken from the Studies on the Protection of the Bosnjaci Spring and the Salakovac

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		› The results of surface water analyses conducted by the Zagrebispekt laboratory have been provided, but the results of the analyses of the Salakovac, Bosnjaci, and Sanica springs, have not been provided. › The methodology states that Pedological maps at 1:100,000 scale were used. Given that more detailed pedological maps (1:25,000) exist for the Project area, the recommendation is to use these in the methodology to obtain a more accurate assessment of groundwater vulnerability based on this parameter. › Are blasting activities permitted within the sanitary water protection zones of the Salakovac and Bosnjaci springs? › Do the sanitary water protection zones of the Sanica spring extend to the Prenj Tunnel route? › For all water sources impacted by the Project, it is necessary to specify whether Decisions on source protection have been issued in accordance with the *Rulebook on the Method of Determining Conditions for Establishing Sanitary Protection Zones and Protective Measures for Sources of Water Supply for the Public* and indicate their availability if applicable. › It is essential to reference the sanitary protection zones and their restrictions, as well as the Decisions on protection zones for drinking water sources, along with their associated reports. These reports are integral to the Decisions and have been prepared in compliance with the Rulebook governing sanitary protection zones and protective measures for public water supply sources. It is also important to include references to the report's pages containing the relevant information, along with details on how to access the report and the Decision on the protection zones of the Bosnjaci and Salakovac springs. › The Study mentions that there are no significant ground water sources or sources tapped for population water supply in the area. Furthermore, on the same page, the report also	Spring, prepared by the Institute for Water Resources in December 2022. As these are officially adopted studies that undergone expert revision, the author weas unable to modify the findings and presented data. › A segment of the motorway is planned to traverse the III sanitary protection zone of the Bosnjaci and Salakovac springs, vital sources of Mostar's drinking water. Protection regulations within these zones typically prohibit activities such as mining and construction. However, a Preliminary Water Consent issued in March 2022 allows for the implementation of special blasting methods to prevent water disruption. The consent specifies, "Plan a special blasting method to avoid disrupting the flow regime of waters in areas where the route passes through water catchment areas or near water structures," thereby opening the possibility of employing mining activities within the III protection zone if necessary. › In the case of the Sanica spring, sanitary protection zones (SPZ) have been designated, and a decision on SPZ and protective measures has been established. The Consultant had access to the established SPZ for the Sanica spring, obtained from the Municipality of Jablanica, and it falls outside the Project area. As the motorway route does not intersect with the SPZ, and the closest distance between the route and the SPZ boundary is more than 3 km, it is demonstrated that there will be no impact from the construction works on the Sanica spring. Consequently, the Sanica spring has been excluded from further consideration. › The requested information on Decisions on source protection has been incorporated into the chapter on groundwater and in the list of references and literature. The specific reports or decisions are not publicly available, and they can only be obtained from the responsible entities or document/decision owners (the City of Mostar and the Water Utility Company in Mostar). In this manner, the author has also indicated the availability location. › The information on sanitary protection zones is incorporated into the study. For clarity, it is important to reiterate that the assessment indicates that the Project will impact four springs:

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		acknowledges the potential existence of intermittent springs or wells along the planned route, creating a need to clarify these seemingly conflicting statements. › The Study emphasises the need to prevent contamination of Bosnjaci's underground water source, which supplies Mostar's population. If turbidity occurs, water supply should be suspended until quality reaches legally prescribed values. The Study should specify protection zones, prohibitions, restrictions, and standard measures. › When assessing the impact of tunnel construction on Salakovac springs, it is concluded that "based on the presented hydrogeological conditions along the Prenj Tunnel route, tunnel excavation and the construction of access roads will not have an impact on the groundwater of Salakovac springs." As previously mentioned, the impact of Prenj Tunnel and access road construction on the water quality of Salakovac springs is possible, as indicated by the established sanitary protection zones (which would not exist if the impact within them were not possible). Therefore, it is necessary to correct the conclusion that there will be no impact on Salakovac springs.	› Konjicka Bijela, overseen by the Konjic water utility company, supplying the City of Konjic. › An unnamed spring located upstream of Konjicka Bijela, constructed by local residents and not managed by the Konjic water utility company, providing water to approximately 30 households in nearby settlements. › Bosnjaci and Salakovac springs, managed by the Mostar Water Utility Company, supplying the City of Mostar. Among these springs, Bosnjaci and Salakovac have Water Source Protection Studies, with Salakovac officially protected by the Protection Decision published in the Official Gazette of the City of Mostar in 2023 (No. 14/23). The initiative to adopt a Protection Decision for Bosnjaci, being an inter-entity spring, has been launched by the City of Mostar and is currently in progress through the Council of Ministers of BiH. Konjicka Bijela spring lacks a Protection Study and officially defined protection zones, falling under the jurisdiction of the Konjic Water Utility and City of Konjic. The unnamed spring, constructed by local residents, does not have a designated owner to initiate legal protection status. › This statement specifically addresses the route section from Viaduct 4 to Viaduct 5, indicating that no significant springs or sources used for water supply are present. It's important to note that the absence of significant sources doesn't rule out the possibility of smaller water features requiring protection. › The impact on Bosnjaci spring is analysed in detail in the Study. The measure on suspending the water supply in case of turbity is given in the ESMP. › The Study establishes a connection between its prescribed measures and the examination of spring protection, specifically as outlined in the Study on Salakovac Springs' Protection Zones. This comment is specifically addressed by clarifying the potential location of negative impacts resulting from the proximity of the motorway to the Salakovac protection zones, as determined through thorough geological and hydrogeological analyses. The Environmental and Social Management

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			Plan (ESMP) includes a comprehensive list of suitable protective measures designed to mitigate the impact in this specific context.
7.	Surface water	› What is the effect of Project on river sediments and the groundwater within them? › Incorporate the latest data on surface water chemistry, ecological potential, and groundwater quantity and quality from the 2022-2027 Water Management Plan for the Adriatic Watershed into the EIA or reference the current state of receiving water bodies and assess the potential construction impact. In the absence of baseline data, conduct surface water monitoring in accordance with the guidelines in the Decision on Characterisation of Surface and Groundwater, referencing parameters for water quality assessment and monitoring. Indicate compliance with the Water Management Plan for the Adriatic Watershed, providing a tabular overview of water body chemical status impacted by the project. › The unnamed local water source catering to approximately 30 households in Gornja Bijela, situated directly along the motorway route, highlights the imperative for safeguarding the water supply for these households. The Preliminary Design set to incorporate technical solutions like culverts or supporting structures to protect this source. However, as previously mentioned, these solutions necessitate additional justification and official protection of this source. › The Study implies construction of river training structures. These activities require the appropriate Water Permit or Preliminary Water Consent to be issued. A bridge construction over the Neretva River at the Donje Selo settlement also requires appropriate water permits. › The EIA lacks the Preliminary Water Consent (PWC), causing uncertainty about its coverage for the Project. It is necessary to obtain PWC and incorporate its conditions into the EIA for various activities, including constructing the motorway and Prenj tunnel, managing wastewater, assessing project effects on groundwater, regulating	› Construction activities will refrain from occurring within riverbeds, thereby mitigating any impact on river sediments. In order to circumvent the construction of viaduct pillars within the Tresanica riverbed, a river regulation spanning 140 meters will be implemented. Furthermore, a regulation of the Bijela riverbed, extending approximately 600 meters, has been scheduled at the request of Konjic Water Utility to safeguard the water quality at the Konjicka Bijela water intake. › The information presented in the study from the 2021 Report on the Quality of Surface and Groundwater in the Adriatic Watershed is more recent than that provided in the 2022-2027 Water Management Plan for the Adriatic Watershed. Nevertheless, in response to this observation, all available data on surface and groundwater status information have been included as requested. Baseline monitoring has also been conducted. It is important to note that this baseline analysis specifically focuses on determining water quality and does not assess the ecological or chemical status of water bodies. The latter two aspects are deemed unsuitable for evaluating potential project impacts on pertinent water bodies such as the Neretva in Konjic, Tresanica, and Konjicka Bijela. › In the Preliminary Design, the proposed solution for preserving this water source is to construct a retaining wall. However, the issue of protection zones falls outside the jurisdiction of the JPAC as the owner of the Project. Given that the JPAC cannot influence the resolution of this matter due to the absence of an owner for the source, technical solutions have been implemented to ensure the residents are not left without a water source. Currently, this is the only practical solution in the absence of other legal resolutions. This spring has been observed in the Study with the utmost attention, and design solutions have been planned to preserve it at its current location without compromising its integrity. In case of any potential issues with technical solutions, the households using water from this spring can be connected to Bijela Reservoir receiving water from Bijela springs.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		riverbeds, and ensuring accredited laboratories conduct water testing. › The EIA should clarify if the project intersects with water and public water property, and if existing decisions define their boundaries, and if there are restricted usage rights for public water property. › The Study should include a list of protected areas for water abstraction, recreational areas, and areas susceptible to eutrophication and nitrates. The update should also identify affected areas. Data from the Water Management Plan and the Decision on the declaration of protected areas in FBiH can be used. A detailed inventory of wells, including public and private sources, is needed, using data from the Cadastre of Water Sources for the Herzegovina-Neretva Canton. › The chapter on surface waters with results from conducted monitoring and physico-chemical analysis by Zagrebinspekt needs revision to comply with legal frameworks and be conducted by an accredited laboratory authorised by the Federal Ministry of Agriculture, Water Management, and Forestry. › The Study needs to consider whether, in the event of a deterioration in the quality of the Neretva River during the construction of the Konjic Bypass and further construction of the motorway to the entrance of Prenj, this will have an impact on downstream discharge of groundwater that is hydraulically connected to surface watercourses, as well as any existing fishponds. › The Study reveals a seasonal increase in heavy metal concentrations in the Konjicka Bijela watercourse, particularly mercury and lead and especially during the high-water season The Study recommends repeating measurements before construction and determining the source of mercury to prevent environmental deterioration during excavation and transport.	› Wastewater discharge requirements are outlined in the Preliminary Water Consent, specifying that in high-risk pollution areas, all road runoffs must be collected and treated to meet the standards in the Rulebook for Wastewater Discharge. Treated wastewater should not be discharged within the high-risk zone, which is also included as a measure in the ESMP. › The issue of regulation will be addressed in the subsequent stages of issuing water permits, following the completion of the Main Design. › Preliminary Water Consent has already been issued for the Project. All further questions related to project structures will be addressed in the subsequent phases of obtaining water permits once the Main Design is completed. The investment-technical documentation is currently in the drafting phase, with the Main Design underway. › The Preliminary Water Consent (PWC) issued by the Adriatic Sea Watershed Agency, Mostar, has been incorporated into the Study as part of the proposed environmental protection measures, including the use of accredited laboratories for monitoring environmental conditions. › The project is situated near water bodies, crossing the Tresanica River, Neretva River, and Konjicka Bijela valley. However, the author couldn't locate the Decision on water property boundaries for Category I surface waters on the Adriatic Sea Watershed Agency's website. The Decision on determining the boundaries of water property for Category II surface waters is issued by the cantonal ministry responsible for water affairs, and this data was not available on the website of the relevant ministry in the Herzegovina-Neretva Canton. › Concerning areas protected by the Water Law, chapter 5.4.3 provides a thorough analysis of water sources and sanitary protection zones, focusing on protecting them from project-related impacts within specific risk zones. Notably, there are no recreational surface watercourses affected by the motorway in the Project area. An assessment based on the Declaration of Areas Susceptible to Eutrophication and Sensitive to Nitrates in FBiH (Official Gazette of FBiH No. 84/18) confirmed that the Neretva and Tresanica rivers, along with the Konjicka Bijela river, are not listed. The piezometer locations have been approximately indicated by hydrogeology experts in the accompanying note. Precise locations will be determined upon

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			completion of the Main project, once the exact motorway and Prenj Tunnel route positions are finalised. A comprehensive list of all wells could not be provided within the study due to the lack of inventory of this type. However, it has been included in the ESMP as a measure to conduct an inventory before the commencement of the Project and once the precise scope of the Project is determined. This measure specifies the obligation to use the Water Source Cadastre as recommended by the expert commission. However, please note that data on private wells is currently being collected as part of the ongoing asset inventory for the preparation of the Land Acquisition and Resettlement Plans (LARPs). This data will be made available to the future Contractor for verification and integration into monitoring activities. However, the Contractor will remain responsible for assessing and verifying the most current conditions before construction begins to ensure accuracy and reliability in the monitoring process. › The EIA Study has considered the impact on the quality of the Neretva River. No fishponds that could be affected by this turbidity have been identified in this area. › The Study conducted an analysis of the origin of mercury and pollutants in the watershed, but unfortunately, the specific source could not be pinpointed. Elevated mercury values were observed exclusively during high-water periods, with lower concentrations noted during low-water seasons. Identified potential sources of mercury contamination encompass an active quarry, activities at a shooting range, and household fecal contamination situated upstream from the sampling location. It is noteworthy that the nature of these activities and the wastewater they generate classifies them as insignificant sources of mercury contamination.
8.	Wastewater	› Include diagrams for all wastewater drainage and treatment facilities with clear explanations of inputs, treatment methods, and wastewater outputs. › Supplement the Study with schematic technical specifications for wastewater treatment equipment with precise discharge coordinates and receiving locations.	› All information available from the designers in this phase related to the quantities of wastewater has been included in Chapter on Wastewater Treatment System. Capacities of devices are also provided according to the estimated quantity of wastewater for autonomous networks of stormwater drainage based on the amounts of wastewater. The provided solution confirms with the requirement of the expert committee. Wastewater treatment and discharge is designed in

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		› Include the graphical presentation of activities requiring Preliminary Water Consent. › Update EIA Study to incorporate conditions, impacts, and measures from the Preliminary Water Consent for the entire Project. › Specify the position of each wastewater discharge point in respect to the water protection zones. Supplement the EIA with estimated quantities of wastewater generated by the Project to avoid assumptions about quantity of water discharge. › The Study emphasises the necessity of meeting legal water quality standards to protect Salakovac springs and avoid impacting their underground water quality. Detailed information, including the applicable legal regulations, discharge location, recipient, and a plan for drainage and treatment, should be included. This activity necessitates a valid water permit and will adhere to the conditions stipulated in the permit. › For wastewater originating from asphalt surfaces within the enclosed section of the tunnel, such as tunnel washing or runoff resulting from fire-related incidents, it is imperative to install a closed reservoir with a capacity of 100 m^3. Each portal must be equipped with a reservoir to manage runoff from the asphalt surface. The water collected in these reservoirs should be pumped and transported for appropriate treatment. Additionally, it is essential to ensure that water gathered on the tunnel plateau is directed to the open route drainage system. Concerning the proposed use of oil and grease separators without bypass and with a treatment efficiency of 100%, it is crucial to specify that discharges from these separators and biological treatment plants must adhere to the conditions outlined in the Preliminary Water Consent and relevant regulations. A comprehensive technological scheme	accordance with the conditions from the existing Preliminary Water Consent and discharge points will be outside high-risk zones.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		should be provided for the collection, treatment, and drainage of this wastewater. In the upcoming design phase, preliminary designs for hydraulic structures should be developed across all sections to effectively mitigate the risk of surface water pollution to an acceptable level. It is essential to address this issue before granting an environmental permit and to update the Study accordingly. It is necessary to provide the baseline condition, assess the impact, and establish the interconnection between soil, groundwater, springs, and drinking water source protection zones.	
9.	Air quality	› An assessment of the impact of strong winds during the motorway's construction and operation phases is lacking, particularly in the Mostar Valley, where powerful winds, such as the "bura", are known to occur, posing a significant risk, including the potential for vehicle overturning, for both cars and trucks.	› The prevailing wind in the region is from the northeast, and experts in air quality modelling have simulated scenarios for this wind direction, including a worst-case scenario with no wind. The wind utilised in the simulation is considered conservative, providing a more cautious perspective on air quality compared to conditions with the "bura" wind. It is assumed that during the operational phase, the motorway will be closed in the event of strong winds that could pose a threat to transportation vehicles.
10.	Noise and vibration	› The impact of noise and vibrations on receptors has been described, but the baseline conditions of these factors in the project area have not been analysed.	› The noise levels stemming from the current road and railway infrastructure are uncertain due to the absence of noise maps and relevant measurements. For the needs of this Sudy, ambient noise monitoring was carried out along the motorway route, Konjic Bypass, and access roads to determine the baseline noise levels. Vibration measurements at 12 locations along the motorway route did not reveal significant sources of vibrations. Specialised ground vibrators were employed, and measurements were taken in close proximity to the source and up to a distance of 40 meters.
11.	Soil and land	› Changes in the soil have not been described. › Supplement the Study with information related to the proper removal of fertile and potentially fertile soil layers, storage locations, and purposeful utilisation, and record the areas of converted agricultural land (after the expropriation process).	› The Project will result in minor topographical changes without significant alterations to the geological makeup, as detailed in Chapter on Landscape and Chapter on Soil. › The ESMP mandates the creation of a Topsoil Management Plan (TMP), outlining procedures for topsoil removal, stockpile management, and erosion control, and it includes adherence to the Law on Agricultural Land of FBiH, Article 55, regarding fertile and potentially fertile soil

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		› The area covered by the Project has been accurately depicted. There is no information available regarding the restoration of areas that will be temporarily utilised. › Add a reference to the currently valid Rulebook on Determining Permissible Quantities of Harmful and Hazardous Substances in Soil and Methods of Their Testing (Official Gazette of FBiH, No. 96/22) to table 81. Additionally, include limit values and interpretations for soil characteristics analyses (pH, organic matter, nitrogen, physiologically active phosphorus). › The land area required for various temporary construction structures, including bridge construction, worker camps, access roads, and waste storage, lacks surveyed maps, size details, and a restoration plan. › The occurrences of bauxite, hematite-iron ore, and manganese deposits in the broader area of the village of Bijela, as well as potential consequences on water bodies resulting from mining and activities in this area, have not been considered.	layers. The exact surface area of land conversion after expropriation is not known since only Preliminary Designs have been prepared at this stage. › The Land and Habitat Restoration Plan (LHRP) is a mandatory plan for the subsequent Project phases, detailing site information, objectives, methods, planting specifications, an implementation schedule, monitoring strategy, and projected costs for area restoration. › shorten into two sentences: The information regarding the valid Rulebook has been updated. Regarding the analysis of the obtained results, please note that the analyses were conducted before the current regulation came into effect. Therefore, the comparisons in Chapter 4.6.3 Soil Quality were made with the 2009 regulation. › The specific details of temporary structures are pending Main Designs, with location constraints specified, and restoration is planned in the subsequent project phases through the Land and Habitat Restoration Plan (LHRP). › The consultant attempted to obtain maps of ore deposits in the FBiH to determine the location of bauxite, hematite-iron ore, and manganese occurrences in the broader area of the village of Bijela but was unsuccessful. Winner Project was also contacted, the company responsible for geological research along the motorway route and received information that during the execution of Mission G1 and now in the phase of Mission G21, no deposits of the mentioned ores were found along the route.
12.	Seismology	› The Seismotectonic map needs to specify its data source and the year of the map, accompanied by a table indicating earthquake depths for better understanding. Additionally, it's suggested to include more recent seismic hazard maps for the Project area and mention relevant geological terrains, even if not officially revised by Bosnian institutions. › Natural disasters such as strong earthquakes, storms have not been considered.	› The data source and earthquake depth information have been provided in subsection 4.3.2.3. The GIS expert who conducted mapping throughout the Study did not have access to the source of the 1981 Seismic Hazard Map, and therefore, was unable to prepare it. If a commission member is familiar with the source, they can provide it to the Study's author for consideration of this proposal. › The geological profile, in Chapter on Geology and Groundwater, provides details on seismic activity, referencing past earthquakes that typically don't cause structural damage but are felt, while Chapter on Soil discusses the potential impact of stronger seismic activity on Klenova Draga's rocky sides. Additionally, Chapter on Climate Data

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			examines wind patterns, precipitation levels, and intensity in the project area, considering future precipitation projections until 2100, which influence storm frequency and intensity. Storms and earthquakes have been also considered in Chapter on Climate Change.
13.	Waste and materials management	› The EIA Study did not consider the ecological implications of raw material procurement. › The assessment should cover potential toxicity and other hazards from waste residues and emissions such as wastewater, gas, and particle emissions. › Temporary disposal sites for excavated soil have not been considered. › To prevent environmental contamination, fuel and hazardous substances should be transferred on a waterproof surface with drainage to an oil and grease separator, and work should pause during heavy rains to protect the construction zone from flooding or erosion. Stormwater runoff should be directed outside the construction area, and proper collection and drainage systems are required for contaminated stormwater from storage and handling areas, with a prohibition on storing excavation materials in areas at risk of water pollution. › The quantities of raw materials and energy required for the construction, maintenance, and use of the motorway have not been discussed.	› Chapter on Waste and Material Management addresses the environmental implications of raw material procurement during the construction, allowing the contractor to source materials from borrow pits or authorised market operators, with strict legal requirements for permits in the case of opening a borrow pit. If materials are purchased from the market, they must come from licensed sources, and the Contractor must develop a Material Management Plan to promote efficient material use and minimise environmental impact during construction. If the contractor decides to open a borrow pit, they will be required to undergo the national EIA screening procedure and obtain a relevant environmental decision, separate from the motorway construction project. › The waste composition has been assessed, with the majority being inert waste from tunnel excavation, which is non-toxic due to its natural components. The Study outlines various waste categories during the construction and operation phases, specifying details for each category, including waste composition, quantity during construction, place of generation, collection location, type of transport to temporary and final disposal sites, and final disposal location with authorised companies or manufacturers. › Temporary storage of excavated soil is not planned as part of the construction of this section. › Measures for emergency situations are already outlined in the ESMP. › Energy data is not accessible during the Preliminary Design phase. Additional details regarding the quantities of energy required for construction will be obtainable once the Main Designs are prepared.
14.	Impact assessment	› The geographic area that the Project may impact has been considered, however, the duration and recurrence of these impacts have not been evaluated.	› The duration of all impacts, including the impact on water, has been considered in phases - as named in this Study: pre-construction, construction, and operation phases. Their recurrence is limited to the duration of each phase. Furthermore, the impacts that will remain as permanent Project results have been assessed, but after the

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		› In the EIA, the residual impacts as well as the direct, significant, high, moderate, medium, low, negligible, positive, negative, and potential impacts are described. It is necessary to supplement the EIA both textually and with clear tabular representations of the indirect, secondary, short-term, medium-term, long-term, permanent, and temporary project impacts. When preparing the descriptions, take into consideration the environmental protection objectives (including water) established by the regulations of the FBiH that are relevant to the Project. › The geographic extent of most direct consequences and the likelihood of each consequence occurring have been identified. Indirect and secondary consequences on habitats (especially priority habitats, critical habitats, and priority biodiversity features), potentially protected areas, and biodiversity have not been analysed and should be supplemented. › Most of the Project's environmental impacts are described in conjunction with other planned developments in the project area, except for the descriptions of the impacts of noise and light on large wildlife and bats, secondary impacts on biodiversity, and the consequences that could result from accidents, unexpected events, and the project's exposure to natural disasters. › The worst-case scenarios during the construction of the Prenj Tunnel have not been described: the occurrence of a strong earthquake during construction, the presence of water with or without gases under high pressure, or gases alone, the occurrence of elevated radioactivity in the tunnel, or the Project being jeopardised due to some other circumstances.	implementation of mitigation measures none of the impacts will be permanent. › The analysis has been conducted in accordance with the assessment methodology presented in Chapter 5.1 Environmental Impact Assessment Methodology. All the criteria mentioned in the commentary have been considered in the assessment and integrated throughout the Study. The valuation of each impact using the specified criteria is presented in tabular form using a "traffic light" impact assessment matrix, considering the interaction between the impact magnitude criteria and receptor sensitivity. › Indirect and secondary consequences on habitats, flora, and fauna have been identified by experts and are presented in Chapter 5.4.1. The pressures that can have indirect consequences on biodiversity are further elaborated on in chapters related to specific areas (e.g., water, soil). The impacts on priority biodiversity features and critical habitats have been separately addressed in the Critical Habitat Assessment document, which is included as part of Book 2: Technical Annexes. › The Study evaluates the impact of construction-related noise and light on mammals, emphasising that the motorway area is not a significant wildlife habitat and highlighting the presence of large mammals like bears and wolves as exceptions rather than the norm. Experts suggest that noise barriers are unnecessary in this area for wildlife protection. The Study also discusses the direct and indirect impacts, addressing potential consequences like chemical contamination and requiring an Emergency Response and Preparedness Plan for timely and effective responses to any major accidents or disasters. › In response to concerns about earthquake impacts during the construction of the Prenj Tunnel, it has been clarified that the tunnel's design incorporates safety factors to handle additional loads from seismic events, ensuring the stability of the excavation and supporting elements, particularly at the portal areas. The issue of hydrostatic pressure in fault zones will be addressed by installing boreholes with preventers along the entire tunnel's length, enhancing safety measures. Regarding radioactivity, the presence of radon in small quantities in the tunnel's southern part is expected but not hazardous

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			to workers' health, as an active 24-hour ventilation system will effectively address all gases, including radon.
15.	Cumulative impacts	› In Table on Cumulative Impacts, the text should be corrected to reflect the impact assessment's focus on the physical-chemical, ecological state, and ecological potential of the Tresanica and Neretva water bodies, including cumulative impacts on groundwater and surface-water interactions. The accompanying text should be revised to clarify that the efforts aim to reduce the likelihood of impacts on the physical-chemical, ecological state, and ecological potential of water bodies, rather than solely focusing on aquatic ecology and water quality. The Study should also be expanded to address the impact on the quantitative state of groundwater and include appropriate mitigation measures. › Uborak, the municipal waste landfill in Mostar is located at the very end of the motorway section, in the Vrapcici settlement, approx. 230 m away from the planned route. The Uborak landfill is filled and transitioning into the closure phase. There is no information available regarding the selection of a new location for the landfill in the city of Mostar.	› The assessment of the Project's impact on water and aquatic ecology is based solely on physical-chemical parameters relevant to water quality, and ecological or chemical indicators aren't used to indicate immediate changes due to motorway construction or use. The ESIA Study has been updated to address cumulative impacts on groundwater and focuses on preserving hydrological connectivity to prevent negative impacts on groundwater quantity, even though the precise quantitative impact cannot be determined due to complex hydrogeological connections underground. › The Uborak landfill was not analysed as part of this Study because it is not within the Project area of influence. The Uborak landfill and its relationship with the motorway were analysed in the EIA Study for the section from Mostar North to Mostar South in the part related to the assessment of cumulative impacts. This Study does not address the closure phase or relocation of the Uborak landfill.
16.	Mitigation measures	› The financing for the implementation of mitigation measures is not explained in the Study. › The Study does not highlight whether there is a contract obligating the contractor to implement the proposed mitigation measures, or if they are merely suggestions and advice. › It is necessary to supplement the EIA with explanations in cases where a reduction of significant adverse effects is impossible or where the contractor has decided, for justified reasons, not to propose any mitigation measures.	› The financing for this project is being considered by the European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB). Therefore, all proposed measures will be funded by these two international financial institutions. The contractor will prepare a bid based on the ESAP, which will be included as part of the tender documentation. › The environmental and social documentation is prepared for potential financiers, including EBRD and EIB, and includes an Environmental and Social Action Plan (ESAP) that outlines actions to ensure compliance with relevant requirements. The ESAP is based on an environmental and social assessment conducted from September 2020 to November 2022 and is an integral part of financing agreements with the Lenders. JPAC will monitor and, if necessary, amend and implement corrective actions based on ESAP performance to improve its effectiveness.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			› There are no identified cases where it is not possible to reduce the environmental impacts.

3 Consultations Under the EBRD's ESP

3.1 Consultation Process

ESIA Package Disclosure

In accordance with the EBRD's Environmental and Social Policy (ESP), for Category A Projects, the EBRD is committed to ensuring that ESIA documents are publicly accessible for 120 days.

The disclosed ESIA package includes the following documents:
- Environmental and Social Impact Assessment (ESIA),
- Technical Annexes to ESIA,
- Biodiversity Management Plan (BMP),
- Non-Technical Summary (NTS),
- Stakeholder Engagement Plan (SEP),
- Environmental and Social Action Plan (ESAP),
- Land Acquisition and Resettlement Framework (LARF).

The disclosed ESIA Study and all the accompanying documents were prepared by taking into account the entire consultation process and its outcome from the local EIA Study.

The ESIA package was disclosed on February 27, 2024, both online and in hard copy.

Hard copies of the ESIA package in both English and Bosnian language have been made available at the following locations:
JPAC premises:
- Sarajevo: Hamdije Kresevljakovica 19, 71000 Sarajevo
- Mostar: Adema Buca 20, 88000 Mostar.

City Halls:
- Mostar: Hrvatskih branitelja 2, 88000 Mostar,
- Konjic: Marsala Tita 62, 88400 Konjic,
- Jablanica: Pere Bilica 15, 88420 Jablanica.

EBRD Resident Office:
- Sarajevo: 15th Floor, Tower B Unitic Towers, Fra Andela Zvizdovica, 71000 Sarajevo.

Additionally, these documents are available for download on the EBRD website and on the JPAC website.

Open House Days

During the ESIA disclosure period, Open House Days were organised to facilitate public engagement and provide transparency about the Project. These events took place from June 5 to June 7, 2024, between 9:00 AM and 5:00 PM, as follows:

1 Konjic:

Date: June 5, 2024
Venue: Municipal Hall
Address: Marsala Tita 62, 88400 Konjic

Jablanica:
Date: June 6, 2024
Venue: Municipal Hall
Address: Pere Bilica 15, 88420 Jablanica

Mostar:
Date: June 7, 2024
Venue: Cultural Center Mostar Sjever
Address: Put za Ruiste, 88208 Potoci, Mostar

The sessions aimed to inform residents and interested stakeholders about the technical aspects of the motorway Project and the findings of the ESIA and to answer their questions.

Representatives from JPAC, EBRD, EIB, the IPF8 team responsible for the development of ESIA Study, and motorway designers were present to answer questions and engage with participants. Each session offered attendees the opportunity to gain insight into the environmental and social impacts of the Project, fostering an open dialogue with the community. The events underscored the commitment to transparency and inclusivity by providing a platform for individuals and organisations to better understand the Project and its implications for local communities.

The invitation for Open House Days was published on following addresses:
- on the web page of the JPAC: link to the JPAC page
- on web portals:
  - Klix.ba [link]
  - Fena [link]
  - Preporod.info [link]
  - Radio Konjic [link]
  - Hercegovacki.ba [link]
  - Mostar.live [link]

Additional Meetings with NGOs

After the completion of the Open House Days, additional meetings were organised with the Hunting Association, Forest Management Company in Konjic City, and the Biospeleological Organisation “Biospeld” to ensure a thorough response to the concerns raised. These meetings aimed to further engage relevant organisations, address key issues identified during and after the Open House Days, and collect additional information on critical topics, including underground fauna, the presence of caves, presence of large mammals in the Project area, and the age of forests in Bijela valley. The content of the ESIA package was updated based on findings from these meetings.

3.2 Key Questions and Discussion Points

Open House Days

The Open House events attracted a total of 65 participants, with 29 attending in Konjic, 12 in Jablanica, and 24 in Mostar. The discussions focused mainly on key topics such as land acquisition and resettlement, protected areas, and hydrogeology, providing an opportunity for participants to voice concerns and seek clarifications.

Below is a table summarising the key discussions held in Konjic, Jablanica, and Mostar, highlighting the most important topics raised by stakeholders. The responses were provided during the meeting by IPF8 Consultant ENOVA Sarajevo, JPAC and the Designers (AIK for the section Konjic (Ovcari)-Tunnel Prenj and IPSA for the section Tunnel Prenj – Mostar South), depending on the subject matter and the party best positioned to provide detailed information.

Table 5: Summary of key stakeholder concerns and discussions in Konjic, Jablanica and Mostar

Location	Question/Discussion Point	Responses
Konjic	› Concerns about expropriation processes and transparency, especially for landowners with family properties or active court disputes. › Environmental concerns, including impacts on habitats, groundwater, and potential pollution sources such as tire particles. › Suggestions to improve project-related studies and consider broader impacts like biodiversity and local ecosystems. › Concerns about access roads to mountain areas and protection of local paths.	› All affected individuals and businesses will be promptly notified once the main design is finalised, and the preparation of the Expropriation Study, as well as the Land Acquisition and Resettlement Plan, begins, ensuring transparency and timely communication. › A detailed hydrogeology survey was conducted during the development of the ESIA, confirming connectivity with water sources and Prenj Mountain, as addressed in the ESIA. Regarding potential pollution, the designer provided a detailed technical explanation of the proposed wastewater treatment system, which will operate as a closed system with purification levels reaching up to 100%. All relevant details are thoroughly documented in the ESIA. › Concerns with regard to biodiversity will be taken into consideration while updating the documents. The field surveys of biodiversity covering spring, summer and autumn as crucial seasons were undertaken by relevant experts and following best practice. The assessment of potential impacts on sensitive areas such as candidate Emerald sites can be widened and improved. › No local mountain roads will be disrupted; an access road will be constructed specifically for the Prenj Tunnel, which will also be available for

Location	Question/Discussion Point	Responses
		hikers and mountaineering rescue services to use.
Jablanica	› Concerns about the town's exclusion from the Project and its implications for regional connectivity. › Discussions on the feasibility of alternative road connections and development of fast roads. › Emphasis on ensuring Parliamentary conclusions are implemented to secure infrastructure improvements. › Queries about project phases, including tendering processes and inclusion in broader planning efforts.	› The Konjic Bypass is currently in the design phase, addressing regional connectivity concerns. Additionally, representatives of JPAC have proposed improvements to the M17 road in several areas; however, no official response has been received from the Municipality of Jablanica regarding these propositions.
Mostar	› Questions about tunnel construction details, including drainage, ventilation, and impact on nearby communities. › Concerns about the environmental impact, biodiversity, and potential groundwater pollution. › Discussions on access to cultural and historical sites near the Project. › Landowners inquiring about the expropriation process and readiness to collaborate or raise objections. › Requests for clarification on road alignment changes and preservation of local roads.	› The designer of the Tunnel Prenj – Mostar North subsection and the representative of the Technical Assistance team for the Prenj Tunnel design shared comprehensive information on construction details, planned ventilation systems, and safety and security measures for the Tunnel Prenj. › Information on all environmental and biodiversity surveys, their results, and the impact assessment process was shared with the relevant stakeholders. This included explanations of the assumptions and limitations of the assessments, such as the absence of official recognition and management of potential Natura 2000 sites in Bosnia and Herzegovina, as well as the lack of historical data on hydrogeology in the karst area of Prenj Mountain. Detailed information was also provided about the hydrogeological surveys conducted and the proposed mitigation measures to minimise risks on groundwater as much as possible. › For the access to cultural and historical sites, the interested stakeholder was informed that the initiatives for the Friendly Environment Projects should be submitted through the local communities and the City of Mostar. › All affected individuals and businesses will be promptly notified once the

Location	Question/Discussion Point	Responses
		main design is finalised, and the preparation of the Expropriation Study, as well as the Land Acquisition and Resettlement Plan, begins, ensuring transparency and timely communication. › JPAC representatives provided a detailed explanation of the selection process for this alternative, highlighting its feasibility and presenting conclusions from the Cost-Benefit Analysis and Feasibility Study. They also assured that no local roads used for the Project will be left damaged, as the Contractor is obligated to restore them to their original condition or better

Following the Open House Days, two letters were received from two NGOs Eko Dvogled and Bankwatch on 30th of June, 2024, containing questions and comments related to the ESIA package.

The tables below provide detailed review of questions raised in these letters, along with the corresponding responses provided.

Table 6: Detailed review of questions from NGO Eko Dvogled regarding the ESIA Disclosure Package (November 2023) with responses provided by IPF8 Consultant ENOVA Sarajevo

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
1.	Alternatives	Additional alternative routes are not explored in detail. Only extreme alternatives are considered to be compared giving the favour to the presented route. The studies need to be updated with the results of further detailed research on route alternatives using more appropriate software techniques and then the environmental and social impacts can be assessed. It is therefore also premature to prescribe mitigation measures, as it is not even clear whether this guidance can be acceptable at all. The permit at national level may not be carried out until appropriate additional surveys have been completed.	All relevant information regarding alternative routes considered has been comprehensively addressed in the ESIA Study in Chapter 3.4 Analysis of Alternatives. A Multi-Criteria Analysis (MCA) conducted in 2006 thoroughly evaluated various corridors to determine the most suitable one for the new motorway, considering essential factors including environmental and societal aspects. Based on this assessment, the preferred corridor was incorporated into the Spatial Plan of the Special Features Area for the Federation of Bosnia and Herzegovina "Motorway on Corridor Vc" in 2017. The ESIA Study did not analyse the impacts of alternatives considered in the MCA, as this was addressed in earlier Project phases. Instead, the focus has been on evaluating all potential impacts along the selected route defined by the Spatial Plan of the Special Features Area for the Federation of Bosnia and Herzegovina "Motorway on Corridor Vc", supported by detailed studies, surveys, and investigations. The Spatial Plan of the Special Features Area for the Federation of Bosnia and Herzegovina "Motorway on Corridor Vc" was adopted in accordance with the Law on Spatial Planning and Land Use at the level of the Federation of BiH (Official Gazette of FBiH, No. 2/06, 72/07, 32/08, 4/10, 13/10, 45/10, 85/21, and 92/21). On this basis the Preliminary Design was prepared in 2022. Within the preferred corridor more localised alternatives have been proposed during further development of the design to its current state.
2.	Geology and hydrogeology	Lack of use of modern software techniques that collect geological and geotechnical data with D2 geological cross section or D3 geological model which may give better options for alternative routes. Per documents information on the presented route and alternatives are built on the basis of hydrological and geological maps in the	All geotechnical investigations and surveys conducted for the current design adhere strictly to the standards and guidelines of BiH. This includes employing modern techniques and specialised equipment, such as seismic refraction, to cover zones of difficult access. Furthermore, the respective programs and implementation have undergone official review by an external licenced entity.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		region and similar previous geological performance which can be very risky predictions.	During Feasibility Study phase and selection of alternatives, use was made of all available data in order to ascertain the geological constraints and eventual mitigation.
3.	Materials management	Considering use of excavated raw material for highway constructions which proved to be wrong and risky with construction of bridge Pocitelj. https://www.slobodnaevropa.org/a/pocitelj-most-autoceste-autoput-koridor-vc-5c/32537772.html.	The question pertains to an external project that falls outside the scope of current Project. This Project will foresee the reuse of excavated material as allowed for by the standards of BiH and construction technical specifications. The on-site Supervision team shall ensure that the Contractor(s) responsible for the construction comply with the technical specifications for material reuse and measures prescribed in Environmental and Social Management Plan for this motorway section.
4.	Hydrogeology and groundwater	Lack of detailed spring and fall underground karst water circulation and accumulations differences in the region of Prenj area (study acknowledges lack of time for several subjects).	The Consultant has utilised all available information and data to make a reasonable assessment of potential impacts on groundwater sources. While the real impacts in the karst environment cannot be fully known, the Consultant has made their best efforts by incorporating both historical and new research to provide the most accurate assessment possible. Chapter 7 on Geology and Groundwater presents a detailed hydrogeological analysis, which identifies significant impacts on several springs. This analysis integrates literature data, maps, and recent surveys conducted by Winner Project, Sarajevo, summarised in the report "Results of geophysical, hydrogeological, and hydrological investigations within supplementary detailed geological, engineering-geological, geotechnical, geophysical, hydrological, and hydrogeological investigations on the section Konjic (Ovcari) - entrance to Prenj Tunnel (2022)". In the impact assessment it was concluded that the Project will impact 4 water sources. These include the Konjicka Bijela source under the jurisdiction of the Konjic Water Utility Company, supplying water to the city of Konjic; an unnamed source upstream from Konjicka Bijela, funded by local residents and serving approximately 30 households in surrounding settlements; as well as the Bosnjaci and Salakovac sources managed by the Mostar Water Utility Company, supplying water to the city of Mostar. Out of these 4 sources, only 2 have renewed Protection Elaborates prepared in 2023 – Bosnjaci and Salakovac, and one source, Salakovac, also has a Protection Decision in place.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			Specific impacts on springs crucial for water supply are analysed in detail in Chapter 7, including groundwater vulnerability and contamination hazard assessments. Mitigation measures are outlined in both Chapter 7 and Chapter 19 ESMP. Regarding groundwater quality impacts, vulnerability and contamination assessments were conducted based on recent Winner Project surveys and reports from the Institute for Water Management, Sarajevo, published in the Official Gazette of the City of Mostar (No. 14/23). Protective measures, including sanitary protection zones for Salakovac spring, have been officially adopted and published. The decision for Bosnjaci spring, being an inter-entity spring, is pending under the jurisdiction of the Council of Ministers. Dye tracing has confirmed the Project's connection to these springs, necessitating adherence to recommended construction practices outlined in the ESMP and current and future water permits. The Sanica water source is not located within the Project's impact zone, and Project activities cannot affect the quality of this water source, as proven by conducted dye tests. The ESIA Study thoroughly examines the impact of deteriorating surface and groundwater quality as one of the most significant concerns. The entire analysis and all measures to prevent negative impacts are primarily focused on preserving water quality at the water sources, addressing contamination of both groundwater and surface water, and ensuring the maintenance of water quality within the Project area. Additionally, the Project foresees the construction of diversionary hydraulic systems between the alignment and the Neretva River in order to allow for road surface water to bypass Salakovac and Bosnjaci springs.
5.	Materials management	Use of private quarries for highway constructions material supplies including quarry Bijela (p. 86) which operated without water area permits (showed recent ecological disaster) https://www.hercegovina.info/vijesti/bih/narusen-prirodni-ekosustav-podrucje-kamenoloma-bijela-	In Chapter 15 Waste and Materials of the ESIA Study, it is explained that during the construction phase, additional construction materials such as earth, gravel, and stone may be required. These materials must be sourced either from the site, borrow pits or purchased from authorised operators in the market. If the contractor opts to establish their own borrow pit, they are obligated by law to obtain valid permits for land use, urban planning, construction, EIA decision and water acts, ensuring compliance with relevant regulations and subject to inspection supervision. Additionally, the

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		nalazi-se-u-zasticenom-geomorfoloskom-i-vodnom-podrucju/223322/.	contractor must develop a Borrow Pit Management Plan as outlined in Chapter 15 Waste and Materials and Chapter 19 ESMP. When purchasing materials from the market, they must originate from authorised sources, specifically licensed quarries and borrow pits with valid construction and water permits. Procurement from unauthorised sources is strictly prohibited. Furthermore, the Contractor is required to prepare a Material Management Plan in accordance with the provisions set forth in Chapter 15 Waste and Materials and Chapter 19 ESMP. This Plan ensures adherence to best practices for material management in construction, promoting the efficient utilisation of natural and artificial resources to minimise waste and environmental impact. Materials sourced from non-authorised origins will not be accepted and will be closely monitored throughout the construction process.
6.	Waste management	Two planned waste areas (north and south from tunnel Prenj) did not pass ecological and social acceptance analysis (p. 99), and both are located in close proximity to main settlements (Konjic and Podgorani).	The Consultant did not locate this specific information on page 99 and is asking for clarification on the specific Chapter where it is mentioned. Chapter 3.2.11 Spoil Disposal Sites (Chapter 1-5), provides the reasoning behind the disposal strategy. It anticipates that excess material from the future southern junction on M17 will be placed in the existing officially approved Konjic Municipal Solid Waste disposal site, upon request of the administration of the City of Konjic to use spoil material as daily landfill cover and for rehabilitation of closed cells. To the south, the Humilisani waste area will accommodate excavated material from both the Tunnel and motorway construction. The sites are assessed for their environmental and social acceptability in the Study as associated facilities.
7.	Forest and vegetation clearing	Lack of addressing deforestation and desertification of the Pranj area which has I-IV degree of protection and construction of highway	Total removal of forest and other vegetation cover on the motorway footprint is an unavoidable impact of motorway construction. Calculations of anticipated loss of broadleaved forest is approx. 58.14 ha, 1.58 ha of coniferous woodland and 5.03 ha of mixed deciduous and coniferous woodland for the entire section from Ovcari to Prenj Tunnel. Of the mentioned,

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
		will have significant effect on the area biodiversity.	broadleaved forest is dominant in the area prior to northern portal of the Prenj Tunnel. Due to lack of *Law of Forests* on cantonal or FBiH level, tree cutting activities performed for the purpose of vegetation clearance for the motorway will have to be in line with good forestry practice and must include the forestry company managing the area. In case the *Law* is adopted on any level by the start of construction, the Contractor will have to comply. As the nature of the Project causes permanent change to the footprint area, offsetting efforts must be implemented in order to compensate for lost forest cover. Offsetting location recommended by the ESIA are the forests around Konjic severely degraded by the forest fires but can also occur elsewhere – depending on location-specific conditions. In addition to afforestation, no forest exploitation zone was determined for the White-backed woodpecker (except for sanitary logging). The Beneficiary will be responsible for implementation and reaching agreements with managing body. Tree logging activities present on the Prenj Mountain are outside of the scope of this ESIA.
8.	Surface waters	Lack of water supplies effect on Neretva River as the longest river in Dinaric area with the most biodiverse regions of the Balkans with numerous endemic flora and fauna species. No use of recent data from Riverwatch scientist information and recommendations. https://www.cnn.com/2023/08/10/world/neretva-river-save-the-blue-heart-of-europe-c2e-spc-intl/index.html.	The motorway and Konjic bypass only intersect with the Neretva River via bridges, and therefore there will be no water supply effects. Chapter 19 of the ESMP outlines two measures: › No construction activities will take place in the riverbed of the Neretva. The bridges will be designed and therefore constructed without disturbing the riverbed. › Hydraulic connectivity of all surface water bodies must be maintained. › River Crossing Management Plan (RCMP) will be prepared, which includes a Specific Method Statement detailing proposed methods to ensure dry working conditions, minimise risks to water quality, and protect aquatic flora and fauna. It is important to emphasise that water from the road, after purification, will be directed into the Neretva River via separate water systems of approximately 12 km in total length in order to protect water sources of Bosnjaci and Salakovac. The preliminary report on the research referenced to on the link (Neretva Science Week 2023) was published in mid-January 2024, two months after the ESIA was submitted to the EBRD and EIB. The surveys focused on the Upper Neretva River, located approximately 40 kilometres upstream from the Project site, in different habitat types and under different pressures. The

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			same is true for the Neretva Science Week edition from 2022. Therefore, the relevance of the collected data is questionable.
9.	Prenj Tunnel design	Lack of addressing tunnel Prenj fire safety and risk analysis as important part of this specific tunnel constructions.	A risk assessment study was carried out during the development of Preliminary design for Prenj tunnel in accordance with the parameters of the latest tunnel design. The risk assessment was used to determine and verify the longitudinal ventilation system. Further text has been added to the ESIA in Chapter 3.2.3 Prenj Tunnel Structure.
10.	Ecological appropriate area of analysis	Not much details on an ecology appropriate area of analysis (EAAA).	The methodology on the determination of EAAAs are given on pg. 8-9 of the Chapter 6 Biodiversity. It is explained on which basis they are established and that a conservative approach was taken if any uncertainty arose. EAAAs were established for every receptor of interest for impact assessment in the context of the Project. Due to the number of maps and the fact that the EAAAs facilitate the Critical Habitat Assessment, please see maps of EAAAs that are a part of the Annex D (Critical Habitat Assessment) to the ESIA. The EAAA maps show the habitats utilised by target species in relation to the motorway route.
11.	Water supply	No specific details on protection of Bosnjaci spring and threat from building Tunnel 5 in the area (p.74).	In Chapter 7 on Geology and Groundwater, details regarding the assessment of impacts on Salakovac spring are provided on page 74. The impact assessment on Bosnjaci spring is given on page 76, and mitigation measures are outlined on page 96 in Chapter 7 Geology and Groundwater. The comprehensive environmental analysis has addressed potential impacts thoroughly and has left no room for uncertainties regarding potential impacts. The ESIA Study considered the worst-case scenarios and recommended appropriate protective measures for both construction and operational phases of the motorway. Potential impacts on groundwater quality during motorway construction could result from excavation, rock blasting, erosion from cuts and embankments, or accidental spills. While these may temporarily affect water turbidity or cause accidental pollution near springs, they are not expected to have lasting consequences on groundwater quality or quantity Part of the motorway route is planned to pass through the III sanitary protection zone (SPZ) of the Bosnjaci and Salakovac springs, critical for supplying water to Mostar. According to the Protection Plan for the Bosnjaci Spring (City of Mostar, Institute for Water Management,

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
			December 2022) and the Regulation on Sanitary Protection Zones for Springs Supplying Public Water Supply (Official Gazette of FBiH, no. 88/12), activities such as mining and unrelated construction that could disturb aquifer composition are prohibited within the III SPZ. The Agency for Watershed of the Adriatic Sea issued a Preliminary Water Approval on March 15, 2022, which mandates water protection measures during preparation and construction (Chapter 7 Geology and Groundwater), specifically requiring a specialised blasting method to preserve water flow regimes where the route intersects with water catchment areas or structures. This permits controlled blasting within the III SPZ. The Project therefore plans to construct 12 kilometres of diversionary hydraulic systems between the alignment and the Neretva River, allowing surface water from the road to bypass the Bosnjaci and Salakovac springs. To comply, a detailed Blasting Plan will be tailored to site conditions and environmental data. Measures in Chapter 19 ESMP include selective drilling and blasting to minimise excavation and maintain geometric integrity, employing millisecond non-electric detonators (DUAL MS) to reduce explosive quantities and seismic effects, and utilising discontinuous filling techniques as necessary. Each blasting event will undergo seismic impact measurement using certified instruments, with results documented in a comprehensive report.
12.	Waste management	Social, environmental and health effect of building waste area close to Podgorani settlement which already has issue with close proximity of waste landfill "Uborak" https://n1info.ba/tag/deponija-uborak/.	The Uborak landfill was not included in this ESIA Study as it lies outside the area of influence of this motorway section. Its relationship with the Vc Corridor motorway was examined in the ESIA Study for the Mostar North-Mostar South, specifically within the cumulative impact assessment section. The Project however includes an excavated material disposal site at the Humilisani, located approximately 8 km from Uborak landfill. This site will not pose negative impacts similar to Uborak, as it handles inert excavation materials such as earth, stone, and humus, without any municipal or other waste categories that could generate odours, leachate, or biogas emissions. Chapter 15 on Waste and Materials lists additional waste categories that may arise during the construction and operation of the motorway. For each category, details are specified including waste composition, quantity during construction, origin, collection point, type of transportation to temporary and final disposal sites, final disposal site, authorised company, and producer.

No.	Topic	Question/Discussion Point	Responses provided by ENOVA Sarajevo (IPF8 Consultant)
13.	Insufficient infrastructure for emergency and healthcare needs	Lack of building or improving accompanying infrastructure including close proximity of local hospitals important for local citizens and specifically important for project workers, then for future high demanding highway/tunnel accident risks. https://avaz.ba/vijesti/bih/703718/haos-u-konjicu-zdravstveni-radnici-opce-bolnice-u-konjicu-prekinuli-rad-i-skinuli-bijele-mantile.	The matter was addressed during the public hearing, where it was clarified that the Environmental Impact Assessment does not encompass hospital renovation or healthcare improvements, making this question irrelevant to the environmental and social impact assessment.

Table 7: Detailed review of questions from Bankwatch regarding the ESIA Disclosure Package (November 2023) with responses provided by IPF8 Consultant ENOVA Sarajevo with support of JPAC and on behalf of Lenders (EBRD and EIB)

Question/Discussion Point	Responses by IPF8 Consultant ENOVA Sarajevo
Risks from improper spatial planning process: As we have raised previously regarding to some of the southern sections of the Corridor Vc, and as the Independent Project Accountability Mechanism's findings have confirmed, the fact that the Federation of Bosnia and Herzegovina adopted the Spatial plan for an area of special interest for FBiH "Motorway on corridor Vc" 2008-2028 in 2017 without consulting the public on the final routing of the motorway means that the subsequent EIA and ESIA consultations for these sections – including the Prenj tunnel and approach roads – cannot be regarded as meaningful. This ESIA consultation is not taking place at a stage when all options are open regarding the routing for this section of the Corridor Vc. The public consultations on the spatial plan were carried out in 2011, but the route was subject to major changes before the spatial plan was adopted in 2017. This means there was no opportunity for the public to comment at an early stage when all options were still open, in line with the requirements of the Aarhus Convention. The EIA hearings in 2018 were held for a specific variant (the Prenj tunnel) and did not allow a different variant to be chosen because the routing had already been defined by the spatial plan. In 2023, when the Aarhus Centar Sarajevo submitted written comments regarding the routing as part of the national-level consultation, the Federal Ministry for Environment and Tourism (FMOIT) answered that this was not the subject of the consultation as the routing had already been set. Lack of public buy-in on the routing has caused significant problems on the section south of Mostar, and the same may happen in this case if no meaningful consultations take place on the actual routing, based on more complete and comparable data on issues like underground water, social impacts, flora and geology. This is a bigger issue than the ESIA study, but it is one which poses a major risk to the success of an already high-risk project. It needs to be resolved by the	The selected route is the outcome of a rigorous, multi-year assessment process that carefully evaluated technical, environmental, and social aspects of several alternatives. This process, including the application of a Multi-Criteria Analysis, was thoroughly reviewed by the Bank during project appraisal and is transparently documented in the disclosed ESIA study (Chapter 3.4). Stakeholder engagement was a central element throughout this process, with public consultations held at various stages to address concerns and incorporate feedback. Consultations were held during the development of the *Spatial Plan of FBiH 2008–2028*, including meetings in all ten cantons, as well as hearings for the *Spatial Plan for the Area of Special Interest for FBiH "Motorway on Corridor Vc" 2008-2028* in 2011 and for the *Spatial Plan of Herzegovina-Neretva Canton* in 2017. Early consultations in 2005 and 2006 focused on the Preliminary EIA and EIA Studies, addressing issues like water protection, noise, and impacts on the proposed National Park. Updated consultations in 2018 for the revised EIA Study for the Tunnel Prenj alternative incorporated concerns about environmental monitoring, land protection, and traffic management, leading to amendments in the study. Additional stakeholder engagement during the ESIA preparation from 2021 to 2023, including socio-economic surveys, field visits, individual meetings with NGO, and public hearings (including Open House Days in Konjic, Jablanica and Mostar), ensured public input was integrated throughout the process for various route options. The chosen route reflects the most balanced decision among reasonable alternatives and complies with local legislation. Based on the request received during the Open House Days in 2024, the Client additionally committed to disclosing the cost-benefit analysis (CBA), reflecting its commitment to transparency in the decision-making process.

Question/Discussion Point	Responses by IPF8 Consultant ENOVA Sarajevo
Federation of Bosnia and Herzegovina government and the EIB and EBRD need to make it clear that this is a condition of financing.	The request from Bankwatch to reassess the alignment process is acknowledged. However, undertaking such an analysis at this stage would require the Client and the Government of FBiH to reopen debates on decisions finalised before 2017, which have undergone due planning, approval and legislative processes. EBRD has conducted extensive discussions with high-ranking government officials, including the Prime Minister of FBiH, the Minister of Transport and JPAC, on similar issues related to the Mostar South to Tunnel Kvanj section. These discussions reinforced the government's position that reopening the alignment process is not feasible due to several factors, including the iterative, multi-year route selection process; the significant parliamentary and legal approvals already obtained; and the adverse implications of reinitiating the process, including delays of several years and potential legal disputes. EBRD and EIB respect the sovereignty of its partner countries and acknowledge the Government of FBiH's mandate to make decisions in public interest. As such, while the Banks remain committed to their mandate to promote sustainable development and ensure compliance with their standards, they cannot interfere with decisions made by the government under its sovereign jurisdiction.
Evidence needed for project justification and benefits: Numerous claims regarding the benefits of the project are made without presenting the underlying evidence or the costs associated with it. For example, current and projected traffic volumes need to be presented, as well as an analysis of how much passing trade will decline for businesses along the route of the existing M-17 road. The motorway will obviously cause a certain amount of environmental impacts, so without any cost-benefit analysis explanation, it is impossible to see whether a full-profile motorway is justified.	The justification for the motorway project is supported by the Feasibility Study, which includes traffic projections, socio-economic evaluations, and references to widely accepted cost-benefit analysis methodologies. Below, the key aspects of your question are addressed, including traffic forecasts, economic justification and broader socio-economic impacts. **Traffic volume projections and justification:** Traffic modelling was conducted in accordance with methodologies outlined in EIB guidelines and European Commission tools for economic assessments. Below are the Average Annual Daily Traffic (AADT) projections for key motorway subsections:

Question/Discussion Point	Responses by IPF8 Consultant ENOVA Sarajevo

The motorway subsection

	AADT in 2029	AADT in 2030	AADT in 2035	AADT in 2040	AADT in 2045	AADT in 2050	AADT in 2055
Tunnel Ivan - Ovcari North	13566	14136	17034	19940	23002	26280	29734
Ovcari North - Ovcari South	9556	9961	11993	14046	16204	18512	20944
Ovcari South - Konjic North	10117	10545	12701	14870	17154	19598	22174
Konjic North - Konjic 2	9875	10292	12396	14514	16744	19130	21644
Konjic 2 - Konjic South	9606	10013	12057	14118	16288	18610	21054
Konjic South - Prenj North	10475	10918	13149	15396	17762	20292	22960
Prenj North - Prenj South	10475	10918	13149	15396	17762	20292	22960
Prenj South - Mostar North	10475	10918	13149	15396	17762	20292	22960

Source: Western Balkans Investment Framework Infrastructure Project Facility; Technical Assistance 9 (IPF9) Mediterranean corridor (Road CVc), construction of Tarcin-Konjic motorway section, subsection Ivan-Ovcari: Feasibility study, ESIA, Detailed Design; Feasibility Study Report.

The study compares traffic values *with and without the motorway investment*:

- Without Investment (2030):
  - Konjic to Jablanica: 13,080 vehicles/day
  - Jablanica to Mostar: 12,439 vehicles/day
- With Investment (2030):

Question/Discussion Point	Responses by IPF8 Consultant ENOVA Sarajevo
	- Konjic to Jablanica: 4,295 vehicles/day - Jablanica to Mostar: 3,341 vehicles/day › Projected AADT on the motorway in 2030 (Konjic to Mostar): 10,918 vehicles/day This demonstrates significant traffic diversion from the existing M-17 road to the new motorway, reducing congestion, improving safety, and enhancing travel efficiency. This information is added to the ESIA Chapter 3.4.1. **Economic justification and CBA:** The socio-economic evaluation was conducted according to internationally accepted methodologies, including: › EIB's Guide to Economic Appraisal of Investment Projects (2023) › European Commission's Guide to Cost-Benefit Analysis of Investment Projects (2008) › European Cohesion Policy Assessment Tool (2014-2020) Key Indicators from the CBA Analysis: › Economic Internal Rate of Return (EIRR): 11.67% › Economic Net Present Value (ENPV): 2,420.63 million BAM at a discount rate of 6% These results indicate that the motorway investment is economically viable and generates positive socio-economic benefits exceeding the costs. **Indirect economic and social impacts:** While the Feasibility Study did not conduct a detailed assessment of indirect impacts on specific businesses along the existing M17 route, it highlights broader economic and social benefits: › Economic growth: Improved market access facilitates the transport of goods, encouraging investment and productivity gains. › Employment opportunities: Motorway construction and operation create direct and indirect employment opportunities.

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	› Improved tourism potential: Enhanced connectivity supports regional tourism growth. › Environmental and social benefits for M17 road residents: Reduced traffic on the existing M-17 road will lead to lower noise levels, improved air quality and enhanced living conditions for residents along the corridor. It is important to note that methodologies used in transport infrastructure appraisals prioritise macroeconomic indicators (e.g., time savings, productivity gains, mobility improvements) over micro-level analyses of individual businesses. **Addressing the lack of indirect impact analysis:** The Feasibility Study acknowledges that indirect benefits are challenging to measure precisely and remain a topic of debate in economic science. However, a high-level overview was included, aligning with international best practices. For a more detailed indirect impact analysis (e.g., effects on local businesses along M17), additional studies and methodologies would need to be applied, which may fall outside the standard scope of a motorway Feasibility Study. In conclusion, the Project justification relies on a robust Feasibility Study, applying internationally recognised methodologies. Traffic forecasts, cost-benefit analysis outcomes and recognised socio-economic impacts all support the motorway's construction. While indirect impacts on businesses along M17 were not analysed in detail, broader regional benefits are well-documented.
Alternatives: The arguments given for the zero option need to be better backed up with evidence. The other alternatives already examined are described well, but have not been updated to respond to the fact that certain sections of the motorway will cause damage that needs to be avoided. These should include: variants in between 'no project' and 'full profile motorway', for example building bypasses for Konjic and Jablanica, as the main current bottlenecks.	The alignment selection for the Corridor Vc motorway project in BiH has been subject to extensive technical, environmental and social assessments over nearly two decades. The process involved multiple Multi-Criteria Analyses (MCA), Environmental Impact Assessments (EIA), public consultations and parliamentary approvals, culminating in the adoption of the final alignment in 2017 within the Spatial Plan for the Area of Special Interest for FBiH (2008–2028). The alignment decision is not only legally binding but also deeply rooted in BiH's national policy

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sub-variants for the most sensitive parts of the route, namely the Bijela valley near Konjic and the village of Podgorani near Mostar, other sub-variants for avoiding Critical Habitats and Priority Biodiversity Features. Even if such variants have been examined and rejected, the public does not know this unless they are described. Without a convincing and publicly consulted analysis of comparable alternatives, compliance with a number of EBRD and EIB requirements cannot be demonstrated. These include: a. Alignment with the mitigation hierarchy - it cannot be proven that impacts have been avoided to the maximum extent possible if no clear and comparable analysis of all possible route alignments has been made available to the public. b. Involuntary resettlement, e.g. EBRD PR 5 objectives: 'avoid involuntary resettlement or, when unavoidable, minimise involuntary resettlement by exploring feasible alternative project designs and sites;' – again this cannot be proven if different routing options have not been laid out in a comparable manner and consulted with the public. c. Priority Biodiversity Features (PBFs) and Critical Habitats - (e.g. EBRD PR6): construction in PBFs and Critical Habitats can only be allowed at all if a number of conditions have been fulfilled, including the absence of viable alternatives for the project development – which in this case must include routing alternatives. d. Appropriate assessment – the purpose of an appropriate assessment is to decide whether a project, if it has significant impacts on an Emerald or Natura 2000 site, can go ahead. If it is found to have a significant impact but cannot be convincingly proven that no alternatives are available, it cannot go ahead, according to the Habitats Directive.	priorities, spatial planning framework and long-term socio-economic development goals. **The "No Project" alternative:** The "No Project" alternative was extensively analysed during the 2005-2006 Feasibility Study as part of the MCA. This option was deemed unacceptable for the following reasons: › Strategic importance: Corridor Vc is part of the Trans-European Transport Network (TEN-T), connecting BiH with the broader European economic system. › Economic benefits: The motorway is expected to drive regional economic development, reduce transportation costs and improve logistics efficiency. › Environmental improvements: Diverting traffic from the existing M17 road will reduce air pollution, noise and environmental degradation in densely populated areas. › Social development: The project will improve connectivity, stimulate tourism, create employment opportunities and enhance access to markets and services. The Spatial Plan for the Area of Special Interest for FBiH "Motorway on Corridor Vc" 2008-2028, adopted by Parliament in 2011, has legally embedded the motorway project into BiH's spatial and economic development strategy. Therefore, revisiting the "No Project" option is no longer feasible as it contradicts the legally adopted spatial and strategic development policies. **Historical analysis of alternatives:** The route alignment decision was a result of years of analysis, consultation and technical studies. Below is an overview of the key milestones: › 2005-2006: Seven alternatives, including a "No Project" alternative, were evaluated through an MCA. Alternative 3 was selected based on technical feasibility, environmental impacts, cost and construction timeline. › 2011: The Spatial Plan for Corridor Vc was adopted, and alignment optimisation was incorporated based on stakeholder feedback.

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	› 2014: A review of Alternative 3 concluded it was technically and economically unfeasible. A shorter and more cost-efficient alignment, Alternative 5 (through Prenj Mountain), was recommended. › 2016: An updated Preliminary Design confirmed that Alternative 5 offered lower environmental impacts, better motorway geometry and reduced costs. › 2017: The alignment through Prenj Mountain (Alternative 5) was formally adopted by the Parliament of FBiH as part of the Spatial Plan Amendment. These decisions were based on well-founded technical, environmental and socio-economic assessments, validated through multiple rounds of public consultations and parliamentary reviews. **Assessment of legally possible alternatives:** The alignment decision is legally binding under the amendments to the Spatial Plan for the Area of Special Interest for FBiH "Motorway on Corridor Vc" 2008-2028, adopted in 2017. Revisiting the route would require overturning established legal processes, repeating feasibility studies public consultations, and parliamentary approvals, resulting in delays measured in years and significant additional costs. Both the Prime Minister of FBiH and the JPAC have made it clear that the alignment cannot be reconsidered without compromising the entire project timeline and objectives. **Mitigation measures and corridor optimisation:** While major alignment changes are no longer possible, several optimisations and micro-alignments have been implemented within the designated corridor to address environmental and social sensitivities: › Geotechnical adjustments: Alignments have been shifted up to 200 m to avoid unstable areas and improve road safety. › Minimising biodiversity impact: Avoidance measures that include relocation of disposal sites from the sensitive potential Natura 2000 and candidate Emerald sites, as well as alterations to the design of the motorway bridge over Neretva were included in the Project design.

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	› Environmental benefits: Visual impacts and hydrological risks in sensitive areas like Klenova Draga Valley. › Preserving quality of drinking water: Changes have minimised water sources and groundwater impacts, enhanced drainage systems and ensured that the alignment and wastewater discharge avoid water protection zones. › Minimisation of land acquisition and physical displacement: On the Konjic side, the alignment in general was designed to avoid densely populated areas with land acquisition impacts primarily in the rural parts. For the Mostar side, the impact on privately owned property is minimal as there are no structures within the planned route that would require expropriation. The number of spoil disposal sites has been reduced compared to the original proposal, further eliminating the need for expropriation. › Improved local connectivity: The Konjic Bypass and other connections to the main M17 road were integrated into the project design to improve local accessibility. › Reducing safety risks: Alignment adjustments reduced the risk of rockfalls in Klenova Draga Valley The details on corridor optimisation are presented in updated Chapter 3.4 Analysis of Alternatives. These measures demonstrate the Project's commitment to adhering to the mitigation hierarchy by avoiding, minimising, mitigating and compensating for environmental and social impacts wherever feasible. **Compliance with EBRD and EIB requirements:** The current alignment is optimised to comply with key environmental and social requirements under EBRD's PRs: › PR 1/Standard 1 (Environmental and Social Assessment): Alternatives were analysed using MCA and validated through multiple public consultations including those described in the Public Consultation Report (Dec 2024). › PR 4/Standard 9 (Community Health and Safety) and PR 5/Standard 6 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement): Alignment optimisation minimised physical displacement. During the alignment optimisation process, priority was given to the technical stability and safety of the route, followed by minimising the impact on private property. The inclusion

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	of the "Konjic South" interchange in the route was a key requirement from the City of Konjic, aimed at reducing traffic congestion in the city centre and improving access to the industrial zone. However, due to its location, this interchange impacts additional private properties. Despite this, the benefits to the broader community outweigh the limited negative impacts. The alignment in general was designed to avoid densely populated areas, with land acquisition impacts primarily in the rural parts of the City of Konjic (i.e. settlements of Ovcari, Gornje Polje, Polje Bijela, Mladeskovici, Bijela). Since the detailed design for the Konjic section has not yet been finalised, and expropriation studies are currently not available, the exact number of households/businesses to be relocated is not yet precisely known. However, based on the conceptual design and visual representation, this number is expected to be around 50 household/businesses. For the Mostar side, the impact on privately owned property is minimal as there are no structures within the planned route that would require expropriation. This will be confirmed once the main project is completed, and expropriation documentation is prepared. › PR 6/Standard 4 (Biodiversity): The current alignment avoids and minimises impacts on sensitive ecosystems to the maximum possible extent. There are no viable alternatives to the current alignment with regard to avoidance of priority biodiversity features or critical habitats as the extent of such habitats is major in the Project area, i.e. there is no alternative within the region for development of the Project in habitats of lesser biodiversity value. All requirements given in the paragraph 13 and 15 of the EBRD E&S Policy and point 17 of EIB Standard 4 are satisfied. › PR 10/Standard 2 (Stakeholder Engagement): Public consultations were held throughout the alignment selection and local EIA and ESIA development phases. **Transparency and public engagement:** JPAC and the Government of FBiH (through key ministries) have engaged in extensive public consultations at key project milestones. Additionally: › Documentation, including ESIAs, MCAs and consultation reports, has been publicly disclosed. › The Government of FBiH and JPAC have repeatedly confirmed their adherence to national legal frameworks and international standards in route selection.

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	In conclusion, the route alignment of Corridor Vc was the result of decades of analysis, consultation, and legal processes. It reflects the most technically, economically, environmentally, and socially viable option while balancing multiple competing criteria. Revisiting the alignment is neither legally nor practically feasible. Moving forward, the focus remains on implementing robust mitigation measures, optimising micro-alignments, and ensuring continued compliance with environmental and social safeguards throughout the construction and operational phases.
Serious impacts on the Bijela canyon Emerald site and for the village of Podgorani: Although the Appropriate Assessment is very general (see below) it confirms there will be impacts on the Bijela canyon Emerald site which cannot be mitigated. These are not described precisely but from what we can piece together, they include the cutting of an unquantified number of hectares of old beech forest; the channelling of the upper part of the Bijela river underneath a large embankment for more than 1.2 kilometres and outside the embankment for a further 600 metres; the construction of other embankments and a 'landscaping' area (ie. disposal site) for the disposal of dug-out waste from the Prenj tunnel and other tunnels. These are significant impacts, especially cumulatively. At the Open Days the study authors stated that there will be no cutting of old-growth forest, however the age of the forest is not clearly shown in the study and in any case, this does not change the fact that there would be significant impacts in an Emerald site. The route needs to be changed to avoid significant impacts on the old beech forest in the Bijela valley and their indicator species, such as the white-backed woodpecker, as they have a very limited distribution in Emerald and potential Natura 2000 sites. Likewise alternative route variants need to be examined to avoid negative impacts on the village of Podgorani at the southern end of the Prenj tunnel.	The Appropriate Assessment has been revised with the aim of improving the contents, structure and the conclusions. This update of the document now includes the channelling of the intermittent stream Suhi Potok in the length of 1,280 m and the regulation of River Bijela in the length of 600 m which is done for the purpose of preservation of the quality of water used for water supply. The beech forest in Rakov Laz is regularly managed by the Forest Management Company Sumarstvo Prenj. They were consulted regarding the age of forests in this area for the purpose of generating a comprehensive map and supplementing the ESIA with this data. However, the representatives of the aforementioned company stated that this forest cannot be described as old and primeval as it is subject to regular tree felling activities. They also do not have data on age of trees in the Project-affected forest. Expert opinion is that white-backed woodpecker's territory will not be directly impacted, however, approx. 10 ha of forest and potential habitat of woodpeckers will be removed in its general surroundings. As its habitat is present throughout the wider Project area, the lack of alternatives which are acceptable from the technical standpoint avoiding the habitat is evident. As a result, a compensatory measure for habitat enhancement is a part of the Project's ESMP. The lack of alternatives with smaller impact on this species as well as biodiversity in general is important to note. The region is characterised by a high density of similar

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For the other sections, it remains unclear whether the currently planned routing is acceptable in terms of environmental impacts due to a significant amount of missing information regarding underground water, underground habitats and impacts on Emerald/Natura 2000 species and habitats. Nor is it clear whether the volume of traffic on this section warrants such a large and expensive tunnel, as opposed to e.g. starting with a bypass around Konjic and improving the current M17 road. Without more comprehensive information on such potential alternatives, we do not find it appropriate for the EBRD and EIB to make a final decision on the construction of the Prenj tunnel and approach roads.	habitats throughout, and any deviation from the current route would result in comparable or greater ecological impact. This is now explained in more detail within Critical Habitat Assessment. Additionally, the Appropriate Assessment was submitted to FMOET as a part of the EIA Package and was also used as a basis for development of Form B in line with European Commission outline. The Project and the potential impacts to the potential Natura 2000 sites and the candidate Emerald sites were presented to the FMOET in dedicated meetings held in January and July 2025 to ensure they are fully informed. As a result of the consultation process, the Ministry agreed that a Form B would be needed, i.e. that significant impact is anticipated to the candidate Emerald site Kanjon Bijele (eng. *Canyon of River Bijela*). The process is ongoing and is anticipated to be completed by the end of 2025 through signing of Form B. For traffic volumes and alternatives please consult previous answers.
No assessment of underground fauna: Overall the picture regarding the underground geology and fauna is unclear as the diagram on p.57 of the Geology chapter shows karst aquifer and underground water flows in the same layer as the tunnel, and the dye tests show underground water flows from the higher reaches of the mountains to e.g. the Bijela valley. Although the study authors stated at the Open Days that Prenj is not known as a particularly cavernous mountain, the study states that near the main fault more karstic features could be expected, so it still seems highly possible that it will impact underground water flows and thus underground fauna. The flows along the tunnel route and in the Orlov Kuk tunnel still seem to be largely unknown.	Additional stakeholder consultations with regard to speleological objects and underground fauna for Prenj Mountain was undertaken for the purpose of collecting more reliable data and strengthening the ESIA. A number of stakeholders were contacted, and meetings were held with stakeholders which expressed interest in cooperation. Data on speleological objects was supplemented and a new map of speleological objects on the subsection Konjic (Ovcari) – Tunnel Prenj was prepared and added to the Chapter 6.2.3.3.5. No additional data for the segment from Tunnel Prenj to Mostar North was obtained. In addition to collecting data on speleological objects, review of available data and consultations with relevant experts on underground fauna was done for the purpose of evaluating the need for detailed underground fauna research at this stage and the level of available information. Obtained expert opinion indicated that the targeted analysis of eDNA fragments of the olm (*Proteus anguinus*) would be the

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	only sensible option. This investigation was carried out before finalising the ESIA study and the results will be included in the relevant chapters and annexes. It is also worth mentioning that the presence of a qualified hydrogeologist is stipulated in the ESMP during construction to enable effective and rapid response if needed. Please also consult answers to comments under *Chapter 7 – Geology and Groundwater*.
Incomplete application of the precautionary principle: Although the precautionary principle is indeed applied regarding several issues (such as including bears and wolves in the critical habitat assessment), it is not uniformly applied as: a) Too many biodiversity studies are left to be carried out later: At the Open Days it was explained that these are pre-construction surveys, but for some studies such as further bird surveys this does not seem to be the case, and the studies need to be included in the ESIA in order to properly assess the potential impacts. For more details, see specific comments. This also curtails public participation as the public has access to the ESIA package, but other studies are done when the main decisions have already been taken, and are usually not available to the public, despite constituting environmental information in the meaning of the Aarhus Convention. b) The study assumes that all mitigation and compensation measures will be correctly implemented and be effective, rather than looking at what might happen in a more realistic scenario where some of them do not work properly.	The ESIA Package has been revised to clarify the purpose of the surveys that must be performed to avoid any further confusion. Robust baseline data collection was undertaken over a period of two years. The surveys conducted to date covered spring, summer and autumn providing a general picture of the species diversity and abundance. The baseline surveys were designed to capture periods of peak biological activity and species detectability which are generally the most informative for assessing biodiversity impacts. Winter represents a period of ecological dormancy for many species in the Project area, and additional data would not have significantly altered the impact assessment or mitigation planning. As some species were not recorded during field surveys but are expected based on the habitats and known species distributions, such species were treated as present in line with the precautionary principle. To ensure the same approach throughout the ESIA Package - the ESIA Chapter 16, Appropriate Assessment and Critical Habitat Assessment were revised. Species such as the otter and the wild cat are now included in the aforementioned assessments where relevant.
Lack of compensation for people living right next to the motorway: Even after the explanation provided at the Open Days on the rationale for having an expropriation corridor of only 50 metres, we still believe this is likely to be too narrow and that there is too binary a system of people whose land or houses are on the motorway being expropriated while those living only a few metres away do	Considering the suggestion of expanding the expropriation corridor, it's important to note that JPAC cannot legally enforce resettlement in areas without a formal legal basis. Expropriation and compensation are guided by existing laws and specific criteria for areas directly affected by construction. The expropriation study defines the properties that need to be expropriated for the Project. It does not define, nor can it include, those not planned for expropriation, and administrative procedures

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not get any type of compensation at all unless they lodge a successful complaint through a complaint mechanism. There needs to be at least some kind of standardised compensation for people with houses, and to a lesser extent for land, within a set number of metres each side of the motorway due to the depreciation of their property value and noise, vibrations and pollution, even if they are not expropriated. According to the EBRD's policy Performance Requirement 5, if people living alongside the Corridor Vc will experience permanent on temporary economic displacement - i.e. loss of land and assets, or restrictions on land use and assets leading to loss of income sources or other means of livelihood - 'the client will offer compensation to affected persons at full replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living and livelihoods,' subject to the provisions in the PR.	cannot be conducted for such properties. The expropriation corridor is determined based on the direct impacts of the Project, such as land and property needed for the motorway alignment and its associated infrastructure. While the socio-economic impacts have been assessed within the wider 500-600 m study area, expropriation applies only to properties directly impacted by the Project footprint. We acknowledge that cases where a house or property remains unexpropriated in the immediate vicinity of a motorway can lead to complex situations, particularly regarding construction disturbances or operational impacts such as noise, vibrations or pollution. However, such cases are expected to be rare and exceptional. The influence of noise, vibrations, and other potential impacts on nearby areas are addressed comprehensively in relevant sections of the ESIA, which is designed to mitigate and manage such effects. For those just outside the direct expropriation area, we acknowledge that construction and operation may impact quality of life to varying extents. However, expanding formal compensation zones arbitrarily beyond the legally defined boundary could create precedents without legal support. Should additional impacts arise during construction or operation, mechanisms are in place to address them in line with national law as well as EBRD and EIB standards. The current legal framework allows for a case-by-case assessment of expropriation if parties bring forward specific concerns. Also, transparent grievance mechanisms for the project are aimed at ensuring that individuals have an avenue to report and seek resolution for any adverse impacts they experience. Lastly, during construction and operation, monitoring systems will assess noise, vibrations and air quality to ensure compliance with thresholds, and additional measures will be implemented as required.
Without a simulation of how the motorway will look, particularly in relation to people's houses and scenic areas, there is an increased risk of public opposition at a later stage, once people understand where it will run and how it will look.	The ESIA has been amended to include a visual presentation illustrating how the motorway will appear in relation to residential areas and scenic landscapes, detailed in Chapter 14 Landscape and Visual Amenity. This chapter has been enhanced with an analysis of Zones of Theoretical Visibility and several photomontages to provide

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	a clearer visual representation of the Project's impact. Mitigation measures have also been strengthened in the ESMP. Additionally, a video presentation of the motorway route has been prepared for the northern sections and is available on JPAC's website at the following link: https://www.jpautoceste.ba/vizualizacija-dionice-autoceste-ovcari-ulaz-tunel-prenj/. The public was also informed through an article on the national news portal klix.ba: https://www.klix.ba/biznis/investicije/pogledajte-kako-ce-izgledati-dionica-koridora-5c-od-ovcara-kod-konjica-do-tunela-prenj/250101101. A video presentation for the southern section has not been finalised at the time of preparing this Report. Once completed, it will be made publicly available through the same channels.
Information missing from social impact assessment: Regarding the social impact assessment, the ESIA does not include all the required information under the EIB Standard 1: *The description of the environmental, climate and/or social aspects likely to be affected by the proposed project, including comprehensive and context-specific identification and analysis of people and communities likely to be affected, as well as other relevant stakeholders, paying particular attention to persons and/or groups that are vulnerable, marginalised, discriminated against or excluded on the basis of their socio-economic characteristics. Assessment of the likely significant environmental and social effects of the proposed project (also taking into account the outcomes of any complementary assessments and/or focused studies as referred to in paragraphs 9 and 10, if applicable), resulting from inter alia:* *(...)* *e. the risks to human health, well-being, persons and/or groups that are vulnerable, marginalised, discriminated against or excluded on the basis of their socio-economic characteristics, cultural heritage or the environment;'*	The ESIA has been revised to include the information required under EIB Standard 1. Sections on the identification of vulnerable and marginalised groups have been expanded to align with socio-economic characteristics, cultural heritage, and environmental considerations. Additionally, risks to human health, well-being, and specific vulnerable groups have been explicitly assessed and detailed in the updated sections of *Chapter 16 Social Impact Assessment*.

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'(...)	
Lack of measures for vulnerable groups: Several vulnerable groups are identified, but without defining how their needs will be further identified and approached. We understand from the Open Days that this will take place through the Land Acquisition and Livelihood Restoration Plan but given that the ESIA and ESAP include general principles on types of measures, and that stakeholder engagement with vulnerable people needs to be planned in advance, it is not clear why it is not already included.	Vulnerable groups have been included within the the ESIA (throughout the chapter 16.8 Assessment of Impact) to reflect the details from the LARF and SEP. The ESIA now provide clear strategies for identifying and addressing the needs of vulnerable groups throughout the Project, including measures (Chapter 16.9 Mitigation and Enhancement Measures) for their engagement and support. As a result, all required actions are included in these updated sections, ensuring that the concerns raised during stakeholder consultations are fully addressed and managed.
Need to differentiate FBIH law and EBRD/EIB standards on vulnerable people: The FBIH Law on Expropriation foresees an additional fee for vulnerable people subject to expropriation, but the EBRD's Environmental and Social Policy requires the identification of vulnerable people for the wider reason of ensuring they are properly consulted and any specific needs taken into account during the project development. These two differing concepts seem to be conflated in this ESIA and need to be differentiated. For example, returnees are not considered vulnerable in the ESIA, and it may be true that there is no particular reason to offer them an additional expropriation fee. However, given their experience of repeated upheavals and trauma, their enhanced connection to their land, and sense of home and heritage, we believe that they should be treated as vulnerable for the purposes of the EBRD Environmental and Social Policy and extra care should be taken with consultations of this group.	The ESIA has been revised to address the clarifications requested. Your feedback has been taken into account, and the necessary distinctions between the FBiH Laws and the EBRD/EIB standards have been made in the ESIA. Specifically, Chapter 16.8 Legal and Policy Framework for Addressing Vulnerable Groups, clarifies that while FBiH laws recognise specific vulnerable groups, EBRD/EIB requirements focus on the broader identification of vulnerabilities. Regarding returnees, Chapter 16.9 Identification of Vulnerable Groups, now includes them as a distinct category. The updated analysis includes a detailed description of returnees, recognising that they face heightened vulnerability due to their history of displacement, trauma, and the emotional and cultural significance of their land. Although returnees may form a smaller group within the overall population, the presence of returnee households in the project area was confirmed during consultations with the Association of Serb Returnees held in October 2022, as well as through individual surveys conducted as part of the socio-economic census in 2022. Their views were taken into account during the consultation process.
Appropriate Assessment needs improvement: The Appropriate Assessment and Critical Habitats assessment both have a different purpose from the ESIA. The information on the impacts in these assessments is not gathered merely to develop mitigation measures, but must form the basis for a decision on whether the project can go ahead at all, and only then to decide how impacts can be mitigated and/or compensated. This is partly recognised on p.6 of the Assessment,	The Appropriate Assessment has been updated to reflect suggestions given by Bankwatch and additional information gathered since the start of initial disclosure in 2023, including consultation meetings with the FMOET held in January and July 2025.

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however, the AA seems to assume the project can go ahead as planned, but without fully proving a lack of significant impact or analysing whether the criteria from the Habitats Directive are fulfilled. Article 6 of the Habitats Directive sets out the framework for site conservation and protection, and includes proactive, preventive and procedural requirements. Article 6(2) requires countries to take appropriate steps to avoid deterioration of natural habitats and the habitats of species, and disturbance of the species, while Articles 6(3) and 6(4) are cited on p.11 of the AA and have been transposed into the FBIH Law on Nature, although a further implementing regulation is still missing. The Federal government did not take a decision as a result of the AA that was included in the EIA during the national level permitting process. But as the EIB and EBRD both require EU environmental law to be applied at project level, their due diligence needs to assess whether: - the project adversely affects the integrity of the site concerned, - there is a true 'absence of alternative solutions', - the project has to be carried out for 'imperative reasons of overriding public interest' - and if priority species and/or habitats are present, whether these imperative reasons relate to human health or public safety, to beneficial consequences of primary importance for the environment. The Appropriate Assessment document consists mainly of screening, with only just over six pages for the actual assessment. As a result, it does not fulfil the requirements of Article 6 of the Habitats Directive and is not carried out according to the Commission's guidance. It does not quantify the species or habitats present or the extent to which they would be impacted, and some species present in the project area are missing (e.g. *Lutra lutra*, R*upicapra rupicapra balcanica* and *Felis silvestris*). Even so, it is clear from the above that the impacts are significant, and the assessment agrees that they cannot all be mitigated. As a result, no clear	Mammal species previously missing from the Appropriate Assessment which have not been confirmed but are potentially present and could, therefore, be potentially impacted, have been added through both the Screening stage (subchapter 3.5.1 Overview of Impacts, p. 68–72 for the mentioned species) and the overview of identified impacts in the Appropriate Assessment (subchapters 5.2 Habitat fragmentation and 5.3 Disturbance of Fauna, p. 117–121). This includes the consideration of impacts on the upstream populations of Marbled and Softmouth trout at Gornji tok Neretve due to the proximity of the spawning site near Konjic to the motorway (p. 106–107, p. 115). In addition, a paragraph detailing compliance with the Water Framework Directive was included at p. 115–117.

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conclusions can be understood on the four points cited in the section above, although the scale of the forest cutting and the planned dyke and river channelling suggests that the integrity of the Bijela canyon Emerald site may indeed be affected. The Appropriate Assessment also does not assess compliance with the Water Framework Directive's goals in line with paragraph 26 of the EIB's biodiversity standards. In addition, it should assess potential impacts on the Gornji tok Neretve Emerald site due to the presence of known spawning grounds for the softmouth and marble trout in the river Neretva around Konjic, as the populations upstream may be affected by construction impacts on the spawning grounds downstream. Taking into account the lack of conservation objectives for the sites likely to be affected by this project, the AA of the project should at minimum include: i. a full description of the project: territorial scope, volume, scale and other specifications, connections of the project with the protected/planned protected area (key distances) etc.; ii. characteristics of other plans, programmes and projects/investment proposals, existing and/or in the process of development or approval, which, in combination with the assessed plans, programs and projects/investment proposals, may have an adverse impact on the protected/planned protected areas; iii. characteristics of the protected or planned protected areas (Emerald and proposed Natura 2000 sites) - subject and objectives of protection, presence of priority types of natural habitats and species, factors contributing to the environmental value of the area, specific significance and/or vulnerability, elements of the protected area sensitive to changes, environmental status (favourable or not);	

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iv.	area of impact: a) types of natural habitats subject to protection by the existing or planned protected areas in question, in the area of impact of the project - area, location, priority, vulnerability, condition; b) habitats and populations of species subject to protection by the existing or planned protected areas in question, in the area of impact of the project - structure and dynamics of populations, priority of species, condition;	
v.	degree of impacts on types of natural habitats subject to protection by the existing or planned protected areas in question, in the area of impact of the project;	
vi.	degree of impacts on habitats and populations of species subject to protection by the existing or planned protected areas in question, in the area of impact of the project;	
vii.	impacts on nature protection objectives (at least generic ones per habitat/species) and the integrity of the existing or planned protected areas;	
viii.	possible mitigation and/or restoration measures;	
ix.	availability of alternative solutions and related opportunities for changes to the project;	
x.	presence of reasons of overriding public interest for the implementation of the project or considerations in relation to human health, public security or beneficial effects on the environment;	
xi.	proposed compensatory measures, if needed.	

Question/Discussion Point	Responses by IPF8 Consultant ENOVA Sarajevo
As underlined above, this information must be used to conclude whether the project as currently planned can go ahead at all, not only to assume it can and plan mitigation measures.	
Critical Habitats assessment missing clear analysis of compliance with EBRD/EIB criteria; over-reliant on compensation and offsets: The identification of the species and habitats is clearly explained and justified, but some seem to be missing, for example *Lutra lutra*, *Rupicapra rupicapra balcanica* and *Felis silvestris*. No overall conclusion is provided on the project's compliance with the EBRD/EIB's criteria on construction in critical habitats, particularly *'the project does not lead to measurable adverse impacts on those biodiversity features for which the critical habitat was designated (...);'.* Overall it is not very clear that the mitigation hierarchy has been applied as in most cases there is no discussion of whether alternative route alignments or design features could avoid damage rather than mitigating it or compensating it. Given the low likelihood of compensation/offsetting schemes working in reality, this is not only a formality, but substantially raises the potential for harm from the project. The Critical Habitat assessment also proposes offsets/compensation for residual impact of several species and habitats that are critical habitat - which is practically prohibited according to the EIB's Standard 4, as such offsets would have to already be operational before the damage is done: 'Recognising that there are limits to the impacts that can be offset, EIB will not finance projects expected to have impacts that would compromise the viability of critical habitat or its associated features (at the scale of the area of influence or greater) regardless of any proposed offset unless or until an offset that can be shown to be effective has been provided. In other cases, uncertainty and time-delays could make offsets unacceptable.'	The EIB's requirements for the Projects being undertaken within critical habitats are indeed very stringent. However, the EIB's conditions under which a Project can be implemented within a critical habitat have been met as given under the point 17 of the EIB Standard 4. The following confirmed features meet the criteria for critical habitat based on EIB criteria, as they are the focus of the comment: › Priority habitat types *6220 Pseudo-steppe with grasses and annuals of the Thero-Brachypodietea and *9530 (Sub-) Mediterranean pine forests with endemic black pines – habitat is found in the buffer zone, not under direct impact › Yellow-bellied toad – recorded in the area of Konjic bypass, habitat is located above a planned tunnel and will not be under impact › Hermann's tortoise and four-lined snake – very numerous and widespread throughout Herzegovina, feasible alternative to the current alignment that avoids its habitat does not exist as species' habitat is virtually the entire area south of Tunnel Prenj › Otter (confirmed by the Bankwatch team in 2022) – it is assumed that the area of Neretva, mouth of Tresanica, Bijela, as well as Ljuta Rivers are a part of the territory of at least one otter present in the area. None of the activities associated with the construction of the Ovcari (Konjic) – Tunnel Prenj – Mostar North motorway have the potential to affect the species' long-term national/regional survival or reduce its conservation status on national or IUCN level. It is important to take into consideration the nature of these critical habitats, the commonness of habitats/species meeting the critical habitat criteria, and the lack of viable alternatives in areas with lesser biodiversity value, proclaimed public interest

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	for this Project, and a robust biodiversity management, monitoring and enhancement measures for biodiversity. In addition, the revised Appropriate Assessment was presented to the Federal Ministry of Environment and Tourism to ensure they are fully familiar with the potential impacts and their mitigation. With regard to offsets, they have been outlined in the Biodiversity Management Plan and utilised as a last resort following the mitigation hierarchy. Where feasible, the design was altered to avoid impact; however, where it was not possible to make alteration to the Project design due to constraints imposed by the Spatial Plan, terrain stability or lack of technical solutions, the impact was mitigated and residual impacts offset.

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Chapter 1-5		
(2006) The 43.35 km long alternative (5) that included the construction of a 12 km long tunnel through Mountain Prenj was assessed as unfavourable at the time due to length of the tunnel and high construction and maintenance costs (Chapter 3.4, Figure 3-56). (2014) In 2014 companies DIVEL, Sarajevo and IG, Banja Luka prepared the Analysis of the Preliminary Design (PD) of the Motorway on Corridor Vc: Subsection Konjic - Jablanica - Mostar North for the previous approved alternative (3) from Bradina (Zukici) to Mostar. The conclusion of	If it was not feasible then, what are the differences in the newer design that make it feasible now? What costs and benefits, and what assumptions on traffic levels, were taken into account when deciding on the current routing's feasibility?	The feasibility of constructing the Prenj Tunnel has evolved significantly between 2006 and the present, driven by advances in engineering techniques, improved economic justifications, and updated assessments of traffic demand and environmental impacts. Based on the results of the 2026 MCA, Alternative 5, which included a 12 km-long tunnel through Prenj Mountain, was considered technically and economically unfeasible. The reasons included: › Technical Complexity: The tunnel length (12 km) posed significant technical and safety challenges for both construction and long-term maintenance.

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the analysis was that this alternative is very expensive and difficult to construct, and therefore an alternative alignment with the 10 km long tunnel though the Mountain Prenj was suggested. This change would result in an 18 km shorter section and savings of 300 million euros. The recommendation to JPAC was to change the alignment and prepare a new PD for the alternative route involving the construction of a 10 km long tunnel through the Mountain Prenj.		› Maintenance and Safety Concerns: Long tunnels require substantial operational costs, including ventilation, fire safety, and emergency evacuation systems, which were seen as prohibitive. › Economic Factors: The alignment was seen as less economically efficient due to high construction and maintenance costs compared to other alternatives. › Traffic Demand: The projected traffic volumes at the time did not justify the significant investment required. As a result, shorter routes with fewer tunnelling requirements, such as Alternative 3, were initially favoured. By 2014, significant factors prompted a reassessment of the Prenj Tunnel's feasibility: › Economic Optimisation: A new analysis by DIVEL Sarajevo and IG Banja Luka revealed that constructing a 10 km tunnel (compared to the previous 12 km alignment) would shorten the motorway by approximately 18 km and reduce costs by around €300 million. › Technical Advancements: Engineering technologies had advanced, enabling more efficient and cost-effective construction and maintenance of long tunnels. › Traffic Volume Projections: Updated traffic studies indicated higher anticipated Average Annual Daily Traffic (AADT) volumes, supporting the economic rationale for the tunnel. **Key Differences Between 2006 and 2014 Assessments:** **Aspect** **2006 Assessment** **2014 Assessment**

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Tunnel Length	12 km	10 km
Cost Efficiency	High construction and maintenance costs	Optimised costs with €300M savings
Technical Feasibility	High safety and maintenance concerns	Improved engineering and tunnel standards
Traffic Demand	Lower traffic projections	Higher AADT projections

The reassessment concluded that the optimised alignment, with a shorter tunnel and updated feasibility parameters, provided a stronger economic and technical case for proceeding with the Prenj Tunnel.

The 2016 Feasibility Study and subsequent analyses provided updated justifications:

- Investment Cost: €555 million for the motorway section, with the Prenj Tunnel estimated at €194 million (compared to the initial estimate of €1.2 billion for 69.5 km-long Sarajevo South (Tarcin) – Mostar North section, with a 6.4 km-long tunnel on the western slopes of Prenj Mountain).
- Economic Return: The Project demonstrated an Economic Internal Rate of Return (EIRR) of 13.66%.
- Traffic Diversion: Updated traffic analyses predicted significant diversion from the M17 road to the motorway, justifying the investment.

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		Additionally, improvements in alignment geometry, hydrology, and geotechnical risk mitigation have further enhanced the technical feasibility and long-term sustainability of the Project. In conclusion, the shift from rejecting the Prenj Tunnel alignment in 2006 to adopting it in 2014 was based on a combination of updated economic analysis, technical advancements, and more reliable traffic projections. The Project now demonstrates both technical feasibility and strong economic justification, aligning with national transport strategies and broader regional connectivity goals.
Project consultations	The overview of the chronology of consultations is useful, however see the general comment above that without a consultation on the actual route variants, including the pros and cons of the current variants compared with those previously on the table (e.g. those presented in 2006), none of these consultations can be regarded as meaningful. They did not take place at an early stage when all options were open regarding the routing for this section of the Corridor Vc, in line with the Aarhus Convention. The public consultations on the project-level spatial plan were carried out in 2011, but the route was subject to major changes before the spatial plan was adopted in 2017, so they cannot be considered relevant as the finally	As previously explained, the selection of the motorway alignment was the result of a long-lasting, multi-stage process that included extensive public engagement at various milestones. This process culminated in the adoption of the Spatial Plan, where the final alignment was legally formalised through parliamentary approval. During the latest consultation process as part of this ESIA development, thoroughly documented in the Public Consultation Report, no concerns regarding the alignment were raised by affected stakeholders. The following key consultation activities were conducted: › **Socio-Economic Survey:** Conducted in 2021 and 2022 for the purposes of the Social Impact Assessment (SIA), surveyors visited relevant households and businesses, explaining the alignment and its implications. During these direct engagements, no concerns regarding the alignment were raised by surveyed residents.

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	adopted routing was not among the options considered then. The consultations on the FBIH spatial plan 2008-2028 similarly did not contain the currently planned routing of the motorway, and in any case this document has not been formally adopted. The EIA hearings in 2018 were held for a specific variant (the Prenj tunnel) and did not allow a different variant to be chosen because the routing had already been defined by the spatial plan. In 2023, when Aarhus Centar Sarajevo submitted written comments regarding the routing, FMOIT answered that this was not the subject of the consultation as the routing had already been set. This situation may lead to problems later on in the project if affected people doubt the robustness of the route selection process.	› **Meetings with NGOs:** Meetings with NGOs were held on multiple occasions in period 2021-2024. The NGOs provided all information available to them to support environmental impact assessment process and emphasised the importance of timely and precise information for local residents. › **Public Hearings:** Held in Mostar and Konjic in May 2023, participants expressed general support for the Project, focusing their questions primarily on specific route details rather than the alignment itself. › **Open House Days:** Organised in Mostar, Konjic, and Jablanica in June 2024, these sessions provided citizens with detailed maps and visual presentations of the alignment. Representatives of JPAC engaged directly with attendees, demonstrating the exact position of the alignment in relation to their homes and businesses. Throughout these consultations, detailed Project documentation, visual materials, and alignment maps were made available to all interested stakeholders, ensuring transparency and clarity. The absence of alignment-related concerns during these consultation phases indicates a general public acceptance of the selected route and demonstrates that stakeholders including directly affected people have been adequately informed and engaged. Discussions with directly affected people will continue through the preparation and implementation of the Land Acquisition and Resettlement Plan.

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Throughout 2021 and 2022, consultation meetings were organised with the representatives of 15 NGOs: Aarhus Centre, Bankwatch, Neretva Zeleni, NGO Dinarica, NGO Farmer, Fruit Growers Association Konjic, NGO Travel Konjic, Hunting Association Konjic, Sports Fisherman Organisation Konjic, Hunting Organisation Koznik, Mountain Bike Organisation Konjic, NGO Boj, Tourism Association Mostar North, Organisation of Fighters and Defenders of Konjic, and Association of Serb Returnees Neretva - Konjic. All NGOs stated that they were previously informed about the Project, but 50% of them are partially satisfied with the level of information received. The NGOs expressed their readiness to further support the implementation of the Project but emphasised that the local residents must be timely informed about the exact route and planned activities. The NGOs generally believe that the Project will have a positive impact on the local communities as it will increase the sales of local products, improve the infrastructure, and increase the number of tourists in the area but stated some concerns regarding impacts on, for example, the orchards used by fruit growers near the motorway section and beehives located in the Bijela settlement or possible negative effects on the	Bankwatch took part in a meeting but certainly did not make any statements committing to support the implementation, neither do we agree that a motorway will increase the sales of local products, as people usually stop less on such highways. At the meeting, Bankwatch asked for main things which should be recorded in the ESIA: › eDNA testing of underground water flows to establish the presence of underground fauna › Additional geological studies to assess the likely impacts on underground water › Research on underground fauna along the tunnel route › A proper Appropriate Assessment. It was explained at the Open Days that eDNA was not done because it might show the presence of species that are not present in the actual project area, so it is just required in the ESMP if the contractors come across caverns while building. However, on further inspection of the ESMP, eDNA testing is required in the year before the project begins (p.21, also p.95 of Chapter 6 on biodiversity), not only during construction. It is therefore not clear why it cannot be done now.	The section referenced from the ESIA document was prepared based on summary conclusions from multiple consultation meetings held with various NGOs throughout 2021 and 2022, rather than a single meeting with Aarhus Centre and Bankwatch. The aim was to provide a consolidated overview of the perspectives, concerns, and inputs gathered during the consultation process as a whole. The Public Consultation Report, included in the ESIA Disclosure Package, offers a detailed account of all discussions held during the ESIA development phase. It captures feedback from a diverse group of stakeholders and reflects a collective summary rather than attributing specific views to individual organisations. For further clarity, individual meeting records are available in Annex A, where the specifics of each meeting, including those with Bankwatch, are documented in more detail. It is correctly noted that key discussion points raised during the meeting with Bankwatch included topics such as hydrogeology, underground caves, eDNA testing, and the Appropriate Assessment (AA). These topics were indeed highlighted and are addressed in both the updated ESIA and ESMP. eDNA testing has been carried out and the results have been included in the relevant chapters and annexes.

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Tresanica River and wildlife migrations. These concerns were addressed in this ESIA and accompanying ESMP, which are part of the Project disclosure package.	The precautionary approach would be to do the testing, discuss the results in the ESIA, and develop scenarios and measures while there is still time to implement them, not wait until the main design is already done and it is too late to change the project based on the results.	
Public hearings organised for local EIA procedure	Our understanding is that concerns were also raised about the routing above Podgorani and a proposal made to extend the tunnel beyond the village, thus shortening the overall route by 3 km. Why is this not mentioned?	This route proposal is not mentioned because such a route option was never part of any Multi-Criteria Analysis (MCA) conducted for this Project. The MCA process, which evaluates various route options based on technical, environmental, social, and economic criteria, did not identify or consider this particular route as a viable alternative. While one local resident suggested the possibility of this route during the public hearing in Mostar, it lacks any foundation in the previous analyses and studies. As such, this suggestion was not incorporated into ESIA.
The comments received strongly indicate that the Ministry did not provide the complete documentation to stakeholders, including the Biodiversity Management Plan, Critical Habitat Assessment, and Appropriate Assessment, despite these documents having been submitted. In response, the Consultant has requested that the Ministry send Book 2 Technical Annexes along with the Q&A Matrix.	We can confirm that the Ministry did not provide the complete documentation to stakeholders during the public consultation period that started in April 2023. This is also apparent from the announcement on the Ministry's website, which leads only to the main study, not the annexes. Although the main study summarises the annexes, without publishing the annexes themselves, it is not possible to see whether specific pieces of information are provided and whether the claims in the main study are well-founded.	It can be confirmed that the Federal Ministry of Environment and Tourism (FMOET) received all the required documents, including hard copies and electronic versions on USB, during the initial stages of the public consultation period that began in April 2023. While it is true that there was an oversight in uploading the full documentation, including the annexes, to their website, this issue was later rectified. This omission was not intentional and likely resulted from the complexity and volume of documentation being handled during the consultation process. However, those interested in reviewing the documents also had access to hard copies of the EIA Study. The complete printed documentation was available at

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		the City of Konjic, the City of Mostar, JPAC offices in both Sarajevo and Mostar, as well as at the FMOET. During the disclosure period for the updated EIA Study, FMOET uploaded the complete Book 2 Technical Annexes, ensuring that all stakeholders could access the full set of documents. This allowed stakeholders to thoroughly review the documents and verify the claims made in the main study. The earlier error was acknowledged, but it was emphasised that the corrective action ensured transparency and inclusivity in the process.
Project location	There is no diagram showing the motorway position in the Bijela canyon. This is particularly important given that the lower part is inhabited while the upper part is a sensitive habitat.	A map of the Bijela Canyon is added to subchapter 3.2.2 of the ESIA.
In order to avoid construction of pillars inside the Tresanica riverbed, the river training in length of 140 m will be done. The training structure will be made of stone lining laid on a 10 cm thick gravel filter layer under which a 200 g/m^2 geotextile layer will be placed.	We understand that there are many limiting factors in the area, but it is not clear from the study whether channelling the river bed for 140 metres really has less impact than construction of pillars inside the river bed? We note the mitigation measure to prevent impacts on the spawning ground downstream by preventing works in the spawning season, however both types of works would still have considerable impacts irrespective of the spawning season.	The bridge at this location spans three critical elements: the Tresanica River, the railway line, and the M17 main road. Due to the unique alignment and the span between the supporting pillars, it was technically impossible to design a solution that would avoid all three elements. Regulation of the Tresanica stream is therefore unavoidable, as it presents the only feasible option to accommodate the bridge's structural requirements. Relocating the M17 road or the railway line was thoroughly evaluated but deemed impractical due to the significant engineering challenges, disruption to essential transportation networks, and prohibitive costs associated with such measures. In contrast, regulating the Tresanica stream is a

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		more viable and efficient approach, ensuring the successful integration of the bridge within the existing environment and infrastructure. It is also important to note that the Tresanica stream in this area in Konjic has already been significantly altered during previous flood protection efforts.
Further on, the motorway route is laid under the slope above the settlements of Bijela and Gornja Bijela. In order to avoid unstable ground for construction, the motorway has lowered from the steep slopes towards the Bijela river to avoid construction in the unstable terrains. However, this will require for the upper section of Bijela river, called Suhi potok stream, to be trained just before entering the zone of the Rakov Laz shooting range (Figure 3-20). The width of the trained riverbed in the bottom is 6.0 m with a total length of trained section of 1,280 m, together with the construction of one culvert through the motorway embankment.	Channelling the main stream in the Emerald site for 1.2 km, turning it into a channel and running it under a wide dyke will have a very significant impact on the Emerald site, irrespective of the intention to leave space on each side for animals to pass alongside it.	The adjustment of the motorway alignment in the Bijela and Gornja Bijela area is primarily driven by the need to avoid unstable ground conditions encountered during the design phase. Geotechnical investigations revealed that constructing the motorway along the steep slopes above the Bijela River would pose significant structural and safety risks. To mitigate these risks, the motorway alignment has been lowered towards the Bijela River, moving away from unstable terrains. However, this adjustment has made it unavoidable to relocate and channel the seasonal stream Suhi Potok in order to accommodate the motorway embankment. Without this measure, it would not be technically feasible to ensure the stability and safety of the motorway infrastructure in this area. The works will take place at the site of the seasonal stream Suhi Potok, and the proposed technical solution has been carefully designed to address both engineering requirements and environmental safeguards. The realignment involves the construction of a stone-lined canal designed to handle a 1-in-100-year high water event from this part of the Bijela River basin. The canal gradient has been carefully planned to follow

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		the natural slope of the Suhi Potok riverbed, minimising disruptions to the watercourse's natural flow dynamics. While it is acknowledged that this intervention will cause an impact on the candidate Emerald site Konjicka Bijela, it is essential to recognise the temporary and intermittent nature of Suhi Potok. The seasonal stream does not provide essential material support to the trigger species responsible for the nomination of the Emerald site. This conclusion has been thoroughly assessed and documented in the revised Appropriate Assessment (AA).
The Prenj Tunnel passes through the Prenj mountain range. The Preliminary Design of Prenj Tunnel from 2016 proposes two variants. Variant I envisage the construction of a two-lane tunnel with a minimum axial distance of 25.0 m in this stretch, while variant II envisages the construction of a tunnel with two-way traffic. The tunnel with two-way traffic of approx. 10 km in length, requires exceptional safety and security measures. In agreement with the investor, variant II assumes the excavation works and primary safety precautions for both tunnel pipes, with the left tunnel pipe serving as the evacuation pipe. The right tunnel pipe needs to be constructed to allow two-way traffic. (...) The adopted road width for two-way traffic is minimum	This section is very unclear about what exactly is planned - one pipe or two, or first one then two. At the Open Days we were told that two tunnels will be dug from the beginning, but this information needs to be presented more clearly in the study.	During 2023 and 2024, the Preliminary Design for the Prenj Tunnel was developed to refine and enhance the technical aspects of the Project. This chapter has been updated to reflect the latest insights and adjustments from the new design, ensuring accuracy and alignment with current specifications. The total length of the left tunnel tube is 10,926.122 meters, while the right tunnel tube spans 10,936.714 meters. Details of the new design, incorporating updated structural and technical elements, are now provided in Chapter 3.2.3 Prenj Tunnel Structure. This chapter includes the most recent design specifications and provides an overview of the updated layout.

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375.00 + 375.00 cm. The left tunnel pipe would be constructed as for variant I, so that in the future, by building a secondary lining and setting up installations, another tunnel pipe for one-way traffic can be put into operation.		
Surface Water Drainage System Wastewater Treatment System	This section mentions oil and grease extensively but what mitigation measures are planned to capture, treat and dispose of tyre particles and salt or other anti-ice agents used in winter on the Konjic side?	In sensitive zones along the route, advanced separators have been designed, which are significantly more effective and costly compared to standard ones, ensuring up to 100% purification of runoff water. These separators operate on the principle of density separation, effectively separating lighter materials from heavier ones. For example, oils and similar substances float and are removed, while sediment and sludge settle at the bottom and are retained as part of the treatment process. Additionally, tyre particles, which are not soluble in water, will also be treated within these separators. These particles will naturally segregate into layers based on their density, allowing them to be captured and removed effectively. Depending on their density, they will either collect in the oily section or settle into the sludge compartment, ensuring that these pollutants are retained and prevented from entering the surrounding environment. It is important to note that chlorides, often associated with road de-icing during winter, are not removed in water treatment processes anywhere in Europe due to the lack of an efficient method for their removal. Chlorides are not

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		classified as toxic compounds, and there are no regulatory threshold values for their concentration or methods for assessing their impact. However, the nature of chloride dispersion mitigates potential environmental effects. Chlorides are typically used during snowy periods and are diffusely drained into the surrounding environment over time rather than originating from a single point source. This gradual diffusion reduces their potential for localised environmental harm. The inclusion of high-performance separators in sensitive areas reflects a proactive approach to minimising environmental impact by addressing pollutants that can be effectively managed, while acknowledging the scientific and technical limitations related to chlorides. This approach ensures that the Project aligns with best practices in environmental protection and water management. This information is added in Chapter 8 Surface Waters, Subchapter 8.3.2 Assessment of Impacts in the Operational Phase.
Spoil Disposal Sites	This section shows the construction of large embankments, and a 'landscaping' section filled with tunnel dug-out in the Bijela valley but does not make the locations clear. It uses the terms Sections 1, 2 and 3 which do not seem to be explained elsewhere and do not correspond to the terms used on p.39 and 40.	The terminology used at pages 39 and 40 pertains exclusively to access roads to the Tunnel Prenj, with NR representing North Access Road and SR representing South Access Road. This abbreviation is now clarified in this Chapter. For Sections 1, 2, and 3 regarding landscaping, the chainage is provided to indicate their starting and ending points. The text on pages 82 and 83 includes an explanation for Section 3 only, which is situated just before the entrance to the Prenj

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		Tunnel. Explanations for the other sections are provided as well.
Borrow pits	This section is left very open to properly assess the indirect project impacts. At the Open Days we were told that the existing Konjic quarry is likely to be one of the sites used, so among others that should be mentioned here and its impacts discussed. Also, it is confusing here as borrow pits situated in proposed Natura 2000 and Emerald protected areas are mentioned, while the ESMP states (p.93) that if the project promoter opens such pits, they may not be situated in protected areas. To avoid confusion, this should also be mentioned in this part of the study.	It is currently unknown which quarry will be used, and the likelihood of selecting one in Konjic was not discussed during the Open House Days. The quarry in Konjic was mentioned as a nearby example, but the final decision regarding the quarry will be at the Contractor's discretion. An inventory of existing licensed quarries is presented in Figure 3-49 on page 90 for the northern section. The ESMP prohibits the opening of borrow pits in protected areas, and this has been also addressed in subchapter 3.2.12 Borrow Pits. It is not common practice for a contractor to open a new borrow pit; rather, they typically purchase material from existing sources of aggregate material. However, if the contractor decides to open a borrow pit, they will be required to undergo the national EIA screening procedure and obtain a relevant environmental decision, separate from the motorway construction project.
Analysis of alternatives	The 'no project' alternative must provide evidence for its claims, including projected traffic figures for this section of the road. In addition, an alternative should be analysed in which a Konjic and possibly Jablanica bypass is built, but without the Prenj tunnel.	The description of "No Project" alternative in Chapter 3.4.1 is updated in the ESIA study using data from the Traffic Study and Cost-Benefit Analysis (CBA). Only alternatives analysed since 2005 could be included in the ESIA. The alignment selection was finalised and legally adopted in the Spatial Plan for the Area of Special Interest for

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	This section gives a good overview of the older alternatives examined, but needs to include sub-variants to address issues with the new route, such as possibilities for avoiding the village of Podgorani. Either here or in the Appropriate Assessment and Critical Habitats assessment, alternative sub-variants also need to be examined to avoid impacts on the relevant habitats and species and the Bijela canyon Emerald site, instead of too readily relying on compensation.	FBiH "Motorway on Corridor Vc" (2008–2028). Therefore, introducing new alternatives, such as a Jablanica bypass, is not feasible at this stage. While the Konjic Bypass was specifically requested by the City of Konjic and integrated into the motorway design, no such request was made by the Municipality of Jablanica. The alternatives concerning the improvement of the M17 route between Konjic and Jablanica are currently under discussion. If an agreement is reached, they will be addressed in separate study documentation. Similarly, an alternative avoiding the village of Podgorani was not considered because no such route option existed in any of the MCA processes conducted for this Project. The selected alignment underwent optimisation to address environmental and social sensitivities to the extent possible within the defined corridor. The ESIA evaluates the impacts of the alignment on sensitive habitats, including the candidate Emerald site Kanjon Bijele, and mitigation measures have been proposed. These measures focus on minimising adverse effects rather than presenting entirely new route sub-variants, which are not feasible within the current legal and planning framework. The alignment, as presented in the ESIA, reflects the outcome of a long-term planning process based on technical, environmental, and socio-economic analyses.
The socio-economic impacts were assessed in 500 m wider study area from both sides of the motorway section and Konjic Bypass, and the	See general comment above – 50 m is insufficient for an expropriation corridor as people living just outside of this will have their	Please see the response to general comment above – under the item "Lack of compensation for people living right next to the motorway".

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expropriation corridor is considered as a 50 m wide principal study area through which the motorway alignment and the Konjic Bypass will pass.	lives made completely unbearable by construction works and then the noise, vibrations and pollution from the motorway. A compensation zone is also needed as the current system is too binary – expropriating people directly on the route while those even just a few metres away get nothing unless they make a successful complaint to a complaint mechanism. The goal should be to resolve issues without complaints, not to react only when complaints are made - in line with EBRD policy Performance Requirement 5. In reality the socio-economic impacts will also be felt over more than 500 m away in areas which were previously peaceful such as Podgorani and the Bijela canyon on non-shooting days. These should also be taken into consideration and addressed, consistent with the universal respect for, and observance of, human rights and freedoms, specifically the right to private property, the right to adequate housing and to the continuous improvement of living conditions.	
Chapter 6 - Biodiversity		
Fauna	There is no assessment of the impacts on subterranean fauna besides all the possible impacts on underground water described in Chapter 7. Many springs, potential underground	Mountain Prenj is not known for having a lot of underground objects and no speleological objects in the immediate vicinity of the Project have been registered based on review of

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	caverns and caves might be impacted, but it is not known for what biodiversity they are a habitat. As a minimum Environmental DNA should be carried out for the springs described in Chapter 7. We appreciate that the project area of influence was enlarged at some locations to correspond to the biology of potentially present species from literature, however it should also be enlarged to include the potential impacts on groundwater and underground biodiversity.	literature, stakeholder consultations and numerous site visits to the Project area. Two nearest known speleological objects are present on the Mostar side, as shown in Figure 6-26 in Chapter 6. Additional data on speleological objects was gathered through communication with relevant stakeholders. The ESIA has been supplemented by this data and a new map of speleological objects on the subsection Konjic (Ovcari) – Tunnel Prenj was prepared. It is now added to the Chapter 6, Figure 6-25. Environmental DNA testing has been carried out and the results have been included in the relevant chapters and annexes. With regards to the newly identified speleological objects, the nearest one is located at approx. 1.3 km from the motorway. No impact on known speleological objects can be expected as a result of the Project. However, it is recognised that the underground objects may be encountered during construction. As a result, the measure for (bio)speleological supervision is included in the ESMP.
Ichthyofauna. Having in mind the motorway route crosses Neretva and Tresanica rivers with two planned bridges, project area of influence and potential impacts with regard to ichthyofauna may stretch downstream if mitigation measures are not implemented. Special attention was paid to the	If we understood properly, there are three bridges, not two, in total – two on the Neretva (including the southern connection to the M1-7) and one on the Tresanica. Due to the channelling of the Tresanica, there will be construction in the riverbed irrespective of	The Appropriate Assessment has been significantly revised to include the Emerald site Gornji tok Neretve. This site is described in detail as a part of the Screening stage (Chapter 2.3.4.4, pages 37–40). Potential impacts on the biodiversity features of Gornji tok Neretve have been assessed in Table 16 within Chapter 3.5.1 (pages 106–107).

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natural spawning grounds found in the river Neretva from the mouth of the river Krupac to the Old bridge in Konjic and from the Old Bridge to the mouth of the river Tresanica. These are salmonids spawning grounds for marble trout and softmouth trout in the stretch of 400 m. This spawning site is located approximately 1 km downstream from the Project area.	where the pillars are built, which will have downstream impacts. Additionally, the Appropriate Assessment (Annex E) should include the Emerald site Gornji Tok Neretve and the potential Natura 2000 sites along the Upper Neretva river which are upstream from the main bridge on Neretva. There is an open complaint to the Bern Convention on the Neretva river.	In addition to addressing potential impacts on the Marbled Trout and Softmouth Trout, other species recorded at the Project site have been incorporated into the assessment. However, impacts on these species were excluded from further evaluation due to the considerable distance between this site and the motorway subsection.
Ornithofauna The White-backed Woodpecker (Dendrocopos leucotos; FBiH VU, BD I), with a population of 300-500 pairs, is one of the rarest and most endangered bird species in Bosnia and Herzegovina. It is an indicator of old and preserved beech forests, with a lot of rotten trees on the ground. Due to intensive forestry and sanitary felling, its population trend is declining. One specimen was observed during the nesting season approx. 170 m west of the motorway (Figure 6-21), while three more territorial males were registered on the slopes of Prenj, outside the impact zone. The size of the Golden Eagle (Aquila chrysaetos; FBiH EN, BD I) population in Bosnia and Herzegovina is estimated at 50-80 pairs and according to the Red List of Endangered Species of	The route of the motorway will destroy old and well-preserved beech forests where White-backed Woodpecker was found by the research team, and by experts of Bankwatch in October 2022. The route should be changed to avoid significant impacts on these beech forests and its indicator species which have very limited areas in the Emerald and potential Natura 2000 sites. Without a change of the route the impact will be significant (more than 10% of the population in the sites). There is different information about the Golden Eagle in the ESIA/Annex C-3 (stated as EN in BIH) and in Annex D (stated as VU in BIH).	Expert opinion is that its territory will not be directly impacted, however, approx. 10 ha of forest and, therefore, potential habitat of woodpeckers will be removed in its general surroundings. However, the measure for core habitat preservation was given in the ESIA which will require targeted forest management and prevention of tree cutting in this part. As the alignment is determined by the Spatial Plan (as explained in detail in the comments above), major alterations to the route are not possible. Additionally, it cannot be guaranteed that the alignment changes would not affect other ecologically sensitive areas or species. It is unclear on what is the estimation of the 10% change in population is based on as the number of breeding pairs in the candidate Emerald/potential Natura 2000 sites is not known. We welcome any data potentially available to Bankwatch that would aid and improve the assessment.

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the Federation of Bosnia and Herzegovina it has the status of EN (endangered species). (...) The flying individual and the empty nest found at a given locality are a definite confirmation of the presence of a nesting pair. (...) The species is extremely sensitive to disturbance. (...) Limitations regarding the timing of works must be imposed so to enable the eagles to select a different nest for the season – construction works shall be performed in the period between the second half of July and the beginning of February and take place continuously and rapidly.		The comment on omissions with regard to conservation statuses of species is much appreciated. All conservation status information was checked as a part of the ESIA revision process to ensure it is up-to-date and correct.
Former protected area of Vrtaljica dolomites (Zlatar-Vrtaljica Hill) near Konjic, through which a tunnel is planned, was designated to protect a number of rare plant species in 195610 but it is no longer under formal protection. Size of this PA was approx. 56 ha and was protected as a botanical reserve in Socialist Republic of BiH (SRBiH). This category would correspond to the current IUCN category I, however, previous categorization of PAs in former Yugoslavia (SFRJ) was not in line with IUCN. The *Law on Nature Protection of FBiH* states that all natural features protected until said law was enacted stay protected but must go through the process of revision. Laws on designation of protected areas adopted in SFRJ are not in force in Bosnia and Herzegovina nowadays, therefore this PA cannot be considered	We agree that the ESIA should consider Vrtaljica as protected and that it is lacking a management plan, a management body and monitoring. However, the explanation given is rather confusing, using terms like 'former protected area' and 'no longer under formal protection', which undermine its importance. As it is indeed legally protected *de iure*, the text should consistently reflect this.	The suggested changes have been applied under the ESIA Chapter 6.2.6. and reflected throughout the ESIA Package. However, we must stress that there is a major difference between protected areas proclaimed in line with the *Law on Nature Protection* of FBiH and areas protected prior to BiH independence in the way they are managed and recognised by the relevant ministry. The FMOET does not include Vrtaljica (or other protected areas designated prior to BiH independence) on their list of protected areas nor in the official web database E-Priroda.

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protected in praxis since no legal steps have been taken to re-establish the PA in independent Bosnia and Herzegovina, there is no monitoring, management body nor management plan. Nonetheless, as the area is considered protected *de iure*, the ESIA considers it as such.		
There are no officially designated protected areas (PAs) in the Project area and in the Project area of influence, therefore they could not be considered for assessment of impacts. No impacts on any officially proclaimed and managed protected areas are expected during the pre-construction, construction and operation phase, hence no requirement for mitigation measures. However, the project will pass through a protected area established prior to B&H independence. As such, it should go through a process of revision. It remains protected *de iure*, but in praxis it is not managed. The motorway will pass through this area in the form of tunnels (T1 and T2), avoiding direct impacts.	This section presumably refers to Vrtaljica. It is confusing to say there are no officially designated protected areas at the beginning but then mention a *de iure* protected area later on. The impacts seem like they could be underestimated as the tunnel exits and entrances, as well as potentially the tunnelling, would surely have an impact on this relatively small area? It would also be useful to have a table similar to Table 6-21 for Vrtaljica.	This comment is related to the previous one and will be addressed jointly through revision of ESIA to clearly reflect the status of Zlatar-Vrtaljica. Table 6-21 refers to the *Summary of impact assessment on potential Natura 2000 sites and candidate Emerald sites and assessment of their significance*. As such, it already includes the Zlatar-Vrtaljica as a part of the Emerald and Natura 2000 sites. However, to avoid confusion and to be in line with the revision of Appropriate Assessment, additional rows are added to the Table 6-21 in order to clearly differentiate between potential impacts on different sites of interest.
Appropriate Assessment Information 'The purpose of the appropriate assessment is to provide all relevant information that can help in the process of assessing the Project's potential adverse impacts to the identified potential Natura	This is a rather partial representation of the purpose of the appropriate assessment that does not clearly distinguish it from an EIA. The information on the impacts in an appropriate assessment is supposed to form the basis for a decision on whether the project can	The purpose of the Appropriate Assessment has been revised in the introductory chapters of the Appropriate Assessment (Chapter 1.1, pg. 6) to address the contents of this comment. Consequently, the Appropriate Assessment sections of the ESIA have been updated accordingly.

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2000 sites and, if identified, how they can be mitigated.'	go ahead at all, and only then to decide how impacts can be mitigated, or, as a last resort, compensated. For more information, see General comments, above.	
Whole table 6-21	The table should show impacts per site as they vary significantly. For example, the impacts on the Zlatar Emerald site may be low or moderate, but the ones on the Bijela valley will be much higher.	Thank you for the comment. As mentioned in a similar comment above, the Table 6-21 was revised in line with the suggestion and now shows the impact for each site of interest separately.
Pre-construction During the development of the Main Design for the motorway, include the recommendations given in BMP regarding viaducts over River Neretva. No construction should be allowed in the riverbed or the riparian area due to their sensitivity.	We agree that no construction should be allowed in the riverbed, but how will this be guaranteed in reality? During the construction of the Pocitelj bridge there were highly disruptive construction works in the river, including a temporary bridge. Measure 19.3.2 in the ESMP also does not seem to guarantee that no construction will take place in the riverbed, but this may be because it does not distinguish between the Neretva and the Bijela and Tresanica rivers that would be partly channelled.	Although no work was initially planned within the riverbeds, the updated Preliminary Design specifies that on the Konjic Bypass, the Neretva River will be crossed by the 387-meter-long M1 bridge near the Donje Selo settlement, located on the right bank of the Neretva River. The bridge spans the existing Sarajevo-Capljina railway, the Neretva River, and the main road M17. It consists of 12 pillars spaced approx. 30 meters apart, with two pillars situated within the Neretva riverbed. These updates are detailed in Chapter 3.2.5. Consequently, pillar construction will occur both on the riverbanks (along the motorway route) and within the riverbed (applicable to the Neretva River on the Konjic Bypass). As a result, all mitigation relating to the works in the riverbeds was updated accordingly and restricts works to the dry period.

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Permanent structures with potential negative impact on biodiversity such as gas stations and billboards with bright lights must not be planned within PBFs or CHs. **Design viaducts as passable structures in the Main Design so to keep habitat connectivity.**	Gas stations and billboards should not be planned within any sensitive, protected or potential protected areas at all. This should not be limited only to PBFs or CHs. We agree with designing viaducts as passable structures, but this seems to clash with the goal of using as much of the material as possible dug out from tunnels to make dykes for the motorway. To which of the viaducts/dykes does this measure apply?	Sensitive and (potentially) protected areas fall into the category of PBF making the PBF/CH designation broad enough to encompass these areas. The dykes are planned in locations where no viaducts are planned, meaning that the viaducts defined as such in the Project description (Chapter 3) are the ones referred to.
Develop and implement Biodiversity Offsetting Plan (BOP). The guidelines and recommendations for development of BOP are given in the BMP.	See comments on BMP.	Noted, thank you.
Additional rapid field research for amphibians must be undertaken during early spring season of the year of construction in order to confirm/exclude the presence of Hyla arborea and Rana temporaria which can be expected north of Mt. Prenj, Additional rapid field research for reptiles must be undertaken in the year of construction in order to confirm/exclude the presence of Telescopus fallax and Zamenis situla which can be expected south of Mt. Prenj where they have suitable habitat. If presence of aforementioned amphibian and reptile species is confirmed, EAAAs must be identified as these species have the potential to	Research for species that may signal the presence of critical habitats or PBFs must be done during the ESIA process, as it needs to be taken into account during decision-making. According to EBRD/EIB standards, the project promoter shall not implement any project activities in critical habitats unless several stringent conditions are met. Moreover, the EIB's biodiversity standard states that 'To avoid risk of irreversible impacts on highly irreplaceable and vulnerable features, the EIB will not finance projects likely to have significant	We appreciate the comment regarding the need for additional biodiversity research prior to construction and recognise the importance of ensuring robust environmental safeguards. However, we believe that the research already conducted, combined with the provisions for adaptive management, fully addresses the risks and concerns raised. Extensive biodiversity research has been conducted over multiple seasons – spring, summer, and autumn, covering all ecologically critical periods as part of the ESIA study. These studies provided a comprehensive dataset on the seasonal presence, distribution, and habitat use of flora and fauna groups of conservation interest. This data forms a solid foundation for understanding the biodiversity baseline in the Project area.

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meet the criteria for PBF and/or CH of EBRD and EIB. If it is determined they might be under direct impact of the Project, it is necessary to perform critical habitat accounting and update CHA and BMP documents with measures to ensure NNL/NG.	adverse effects on such features, regardless of compensation or offset measures.' It is therefore not in line with the precautionary principle to leave such research to such a late stage, as it is not simply a matter of updating documents – it should have an influence on the Bank's overall financing decisions.	Recognising the time that could potentially pass between the completion of the ESIA study and the anticipated commencement of construction, provisions have been included to account for potential environmental changes before construction begins. These provisions address key concerns such as the spread of invasive species, habitat succession, and meadow overgrowth, which could influence species composition within the Project area. Importantly, the ecological context of the site suggests that such changes are unlikely to lead to the emergence of new critical habitats or priority biodiversity features within the Project area. The mitigation hierarchy has been rigorously applied for all species and habitats identified as being under significant impact. Measures to avoid, minimise, restore, or offset potential impacts are already in place, ensuring adherence to EBRD/EIB standards. Where residual impacts on biodiversity have been identified, targeted actions to achieve No Net Loss (NNL) or Net Gain (NG) are incorporated, including habitat restoration, ecological offsets, and species-specific mitigation measures. Furthermore, based on the results of previous studies and the low likelihood of the emergence of new critical habitats or priority biodiversity features, additional research is not expected to yield new or contradictory findings. The existing monitoring and adaptive management measures provide a robust mechanism to detect and respond to any unanticipated changes.

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		Regarding compliance with EBRD/EIB standards and the precautionary principle, the Project's approach aligns with these requirements. Comprehensive baseline studies were conducted during critical ecological periods, were supported by extensive literature review, and additional measures are planned to reassess findings if significant environmental changes are observed. By incorporating these findings transparently into the ESIA and accompanying documentation, it is ensured that decision-making processes are well-informed and compliant with the standards of the Banks. Further extensive biodiversity research immediately prior to construction commencement is unnecessary as the established baseline is comprehensive and potential changes in habitat conditions are addressed through adaptive monitoring, and any significant environmental changes during the intervening period will trigger pre-defined, rapid response measures to reassess potential impacts and incorporate these into the documentation. The existing biodiversity provisions, which include periodic checks and targeted surveys for potential changes, represent a pragmatic and effective approach. Delaying construction to duplicate studies without new evidence of significant change would lead to unnecessary delays without adding substantive value to conservation outcomes. No additional biodiversity research beyond the existing provisions is warranted prior to construction. The measures in the ESIA and accompanying documents have been revisited to effectively communicate this.

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Additionally on Surveys conducted over 10 months of the year, although covering all ornithological aspects, are insufficient to fully valorise the area and assess the impact of the motorway on birds, which is why it is desirable to conduct additional research for all bird groups (...) An inactive nest of a Golden Eagle (Aquila chrysaetos) was found in the area of Klenova Draga and one individual was registered in flight at the same location. Before construction, it is necessary to conduct additional research in order to determine whether there is another location in the immediate environment where this species nests. Rocks and cliffs in the area of Klenova Draga and Badnjena Draga are potential habitats for the Peregrine Falcon (Falco peregrinus), which is one of the 10 rarest and most endangered species in Bosnia and Herzegovina, and the Eurasian eagle-owl (Bubo bubo), which has not been fully explored due to the curfew established by the government to prevent the spread of the Coronavirus. Additional rapid survey of these species in potential habitats is required and it is to be performed in 2023.	The additional studies on birds should be carried out as part of the ESIA, not after that. Also, 2023 has already passed, so new research needs to be carried out anyway. The Golden Eagle measures are not in line with the recommendations in 6.2.3.3.4, which say that *'Further monitoring must be performed through all Project phases. Limitations regarding the timing of works must be imposed so to enable the eagles to select a different nest for the season – construction works shall be performed in the period between the second half of July and the beginning of February and take place continuously and rapidly.'* They should be the same in both places.	Thank you. The measures with regard to additional surveys have been revised in order to reflect the current status. The quoted requirement for the Golden Eagle was removed from the Chapter 6.2.3.3.4 as the chapter presents baseline and not mitigation nor monitoring requirements. It was also established that the three-year period which would require additional surveys was very stringent and no major changes could have occurred in the areas in such short period. Therefore, this was changed to five years after finalisation of initial surveys for ESIA.

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In the year of construction, but before any works commence, perform eDNA analysis in order to valorise underground fauna not accessible by standard invertebrate surveying methods. Focus on the area where works are planned near and in Mountain Prenj.	The precautionary approach would be to do the testing, discuss the results in the ESIA, and develop scenarios and measures while there is still time to implement them, not wait until the main design is already done and it is too late to change the project based on the results.	Environmental DNA testing has been carried out and the results have been included in the relevant chapters and annexes. In addition, the requirement for eDNA analysis of water if any caverns open during tunnel construction is stipulated by the ESMP.
Chapter 7 – Geology and Groundwater		
Overall	This chapter would benefit from horizontal diagrams to show the profile of what is being described (like the one on p.57, but more detailed ones to show e.g. the position of springs more clearly). Since the impacts of the project and on the project largely depend on different geological layers, maps that look only from above do not allow a good understanding of what is written.	Thank you for your feedback and suggestion regarding the inclusion of more detailed horizontal diagrams. At this time, a more detailed horizontal diagram is not yet available. The Main Design for the Prenj Tunnel is currently underway, and additional data, including more precise diagrams, will be available upon its completion.
Overall	This chapter underlines that the tunnel will be built above the impermeable rock layer (see e.g. the diagram on p.57 and accompanying explanation) and mentions that most caverns are likely to be found near the main fault that the tunnel will cross. Yet neither here nor in the biodiversity chapters is there any mention of underground fauna.	Additional stakeholder consultations and speleological objects mapping was performed during the ESIA revision. No speleological objects under potential impact were identified. The possibility of caverns opening during construction is recognised by the ESIA and accompanying ESMP measures are provided. The important karstic element of underground fauna is *Proteus anguinus.* The area of this species does not overlap with the Project and is therefore excluded from the assessment.

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		Please see answers above for more details.
Place of dye injection at Jezerce (0) and monitoring locations (1-4)	The maps are illegible (7-23 a little less so than the others, but still not clear).	Unfortunately, the maps in question were provided by the subcontracted company responsible for conducting the tracing tests, and higher-resolution versions are not available at this time. Despite the Consultant's efforts to obtain clearer and more detailed versions of these maps, the subcontractor was unable to provide improved quality. If additional resources or data become available, they will be promptly shared.
'Since the underground connection with spring Bascica is not determined, it can be concluded that groundwater in the zone of Jezerce abyss moves north-east toward Konjicka Bijela, and not north-west toward Bascica. As a result, depending on the hydrological situation (quantity of precipitation), the groundwater may appear in the zone of south portal of the Prenj Tunnel in form of moist patches or water dripping.' And 'The hydrogeological relations on the Prenj Mt. indicate that there should be no significant penetration of high-volume groundwater during excavation of the Prenj Tunnel. The groundwater penetration can be expected only in the main fault zone, where underground karst forms (caverns, pits, karst channels) are found. The groundwater may appear in the form of dampening, throughfall or weak leakage and only during periods of heavy	It's not clear how dye tests can establish that the groundwater would only appear during the construction of the Prenj tunnel to such a minor extent. This should either be better explained or the conclusion revised.	The conclusions regarding the limited extent of groundwater appearance during the construction of the Prenj Tunnel are based on detailed analyses of the geological composition and hydrogeological conditions of the area, as well as the results of tracer tests. These tests included an assessment of dye injection points, locations of dye emergence, travel distance, flow speed, and other relevant factors. The comprehensive methodology and findings provide a solid scientific basis for the stated conclusions. To gain a complete understanding of the hydrogeological context and the rationale behind these conclusions, it is essential to thoroughly review the entire hydrogeological section of the ESIA Study. Focusing on isolated passages without considering the broader context may lead to misinterpretations or incomplete assessments. The ESIA Study presents a holistic evaluation of the area's hydrogeological system, offering a robust explanation for the conclusions drawn.

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rainfall and sudden melting of snow on the Prenj massif.'		
These results undoubtfully indicate that the groundwater from this area is mainly drained west and north toward the Neretva River, and not toward the Prenj Tunnel. Since the main fault crosses the Prenj Tunnel alignment, it is expected that groundwater will appear along the fault zone in quantities that will depend on the hydrological situation.	These two sentences appear to contradict one another. Perhaps this can be better explained.	Thank you for your suggestion, this paragraph has been revised accordingly.
Assessment of groundwater impacts on motorway Construction Based on the available design documents and results of engineering and geological researches carried out so far for the purposes of designing the Prenj Tunnel, which were limited to portal zones and surface mapping of the terrain (without exploratory boreholes along the tunnel route), it can be concluded that the elevation of the tunnel will be above the impermeable subgrade represented by Lower Triassic flysch sediments, which is a barrier to the movement of groundwater. (...) The groundwater penetration can be expected only in the main fault zone, where underground karst forms (caverns, pits, karst channels) are found. (...)	This section seems to contradict the diagram on p.57 which does not show groundwater flowing only in the main fault zone. It may be that the diagram is not clear enough, but overall the information presented does not seem to add up and gives the impression that the underground water flows are not well understood. Also the diagram shows the tunnel going through karst aquifers, which seems to contradict the information shared during the Open Days regarding recent geological drilling showing that solid rock was not far below the surface. Although this drilling was done for another purpose, perhaps the diagram needs updating to reflect its findings?	The hydrogeological profile along the Prenj Tunnel route illustrates the types of rock, based on porosity, through which the tunnel will pass, as determined from the available data (noting the absence of investigative works along the tunnel alignment, except in portal zones). According to the hydrogeological profile and previous explanations related to dye test results, it has been concluded that groundwater flows both above and below the tunnel's alignment, following dominant flow paths. The most significant groundwater flow paths are located in the zones of major faults, where underground karst formations, such as caverns, karst channels, and similar features, are present. Although the excavation of the tunnel will primarily pass through solid rock, as noted in the comments, groundwater movement occurs even within solid rock. This movement follows dominant paths along fractures, channels, or larger karstic features, such as caverns or caves. Fault zones, in

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During the excavation of the Orlov Kuk Tunnel - T5, which is located in the hinterland of the Bosnjaci spring, underground karst channels carrying groundwater from the direction of Zijemlje towards Bosnjaci may be cut off. In the case of such a scenario, it is necessary to prevent the contamination of the groundwater of the Bosnjaci spring. If turbidity of groundwater occurs at the water source, it is necessary to stop the water supply for the village until the quality of the water is brought to the quality prescribed by law.	The impacts on Bosnjaci spring and underground fauna may be extremely serious and the mitigation measures proposed in the following sections do not seem sufficient to prevent this.	particular, represent the primary pathways for groundwater flow. The Bosnjaci spring is directly connected to the sinkholes in Hansko Polje, making it inherently vulnerable to contamination. This intrinsic risk underscores the critical need for comprehensive and detailed mitigation measures to address even the worst-case scenarios. Such scenarios must be anticipated during the Project design and construction phases, and robust protection measures must be developed and implemented accordingly. Karst systems are notoriously unpredictable, often displaying characteristics that defy conventional logic. For example, in a karst environment near Niksic, Montenegro (Poklonci spring), eight boreholes were drilled within a 30x30 meter area. Only three of these intersected an underground water flow yielding 50 litters per second, while the remaining five were completely dry. This disparity highlights the dominant, channelised nature of groundwater movement in karst systems, where water flow is confined to specific pathways, such as a 50 cm diameter karst channel. This example illustrates the potential for drilling to intersect an underground water flow leading to the Bosnjaci spring, making such a scenario plausible. Therefore, it is imperative to engage experienced hydrogeological engineers during both the design and construction phases of the motorway, particularly in areas with complex karst systems such as the Prenj and Orlov Kuk tunnels.

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		Hydrogeological expertise will be essential to ensure that any risks to the Bosnjaci spring and its surrounding environment are thoroughly assessed and mitigated. This includes identifying potential underground water pathways, designing targeted protective measures, and closely monitoring construction activities to minimise the likelihood of environmental impacts. By incorporating this specialised expertise, the Project can better safeguard the Bosnjaci spring.
Assessment of construction impacts on groundwater It is suggested to conduct a field visit and record all hydrogeological phenomena in the zone of influence of the construction of this section of the motorway. These actions are captured in the Environmental and Social Management Plan. Four springs are located in the immediate vicinity of the route, of which two are captured for the water supply of Konjic (Bijela and Gornja Bijela), and two springs are used for local needs of about 30 households in the settlement of Gornja Bijela. The springs used in the Konjic water supply system have not undergone detailed hydrogeological research and are not officially protected by sanitary protection zones. (...) regulation of the natural course of the river Bijela is planned for a	It is quite risky to assess the impacts on groundwater based on assumptions and propose additional studies for after project approval. All studies need to be carried out before the ESIA is done. Realistically, impacts on at least the Bijela, Bosnjaci, and Livcina springs seem probable, but the measures in the ESMP are insufficient, risky and difficult to control.	While it is acknowledged that some uncertainties remain, the approach taken in ESIA aligns with international best practices for managing groundwater impacts in complex projects of this nature. Groundwater systems, especially in karst terrains, are inherently challenging to model and predict due to their dynamic and variable nature. The ESIA process has therefore combined detailed studies with adaptive management measures to address these uncertainties. Extensive hydrogeological studies have been carried out during the ESIA preparation to establish a baseline understanding of the groundwater system. These studies included tracing tests, water quality analyses, and hydrological mapping. While these provide a solid foundation, the dynamic nature of karst systems means that additional localised effects may only become apparent during construction. The following points outline why this approach is appropriate and how potential risks are mitigated:

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length of about 600 meters, which will further ensure that the intake is not endangered (...) With the Prenj Tunnel, the motorway route cuts through a large fault zone that divides the Prenj massif. About two-thirds of the excavation of the Prenj Tunnel is designed to be carried out through the IV sanitary protection zone of the Salakovac springs Tunnels T3A and T4, as well as the complete motorway route to Podgorani and Zelenika, were designed through karstified limestones of Jurassic age within the III sanitary protection zone of the Salakovac source, the route continues through the T5 Orlov Kuk tunnel, whose entrance portal and about one-third of the tunnel length is located in the III sanitary protection zone of the Bosnjaci spring. The Bosnjaci spring is located about 850 m west of the entrance portal of the tunnel. Tunnel T5 is the most sensitive location on the motorway route from the aspect of groundwater protection due to its proximity to the Bosnjaci spring. As the tunnel cuts through the limestone, karst channels and caverns can be expected to appear, which may be the underground streams of the Bosnjaci spring, as well as the occasional	The regulation of the river Bijela will be for more than 1200 m according to the other sections of the study. The impacts on Bosnjaci spring and underground fauna may be extremely serious and the mitigation measures proposed in the following sections do not seem sufficient to prevent this.	› The ESMP includes measures for continuous groundwater monitoring throughout the construction phase, led by experienced hydrogeological engineers. This approach ensures that any unforeseen impacts can be identified in real-time and addressed promptly. › The presence of hydrogeological engineers on-site during construction provides an additional layer of protection. Their expertise enables real-time decision-making to mitigate risks such as contamination, changes in flow patterns, or accidental spills. This adaptive management approach is more practical and effective for complex systems than attempting to predict every potential impact before construction. › While additional studies are planned for the pre-construction phase, this does not imply that the project approval process is based on unsubstantiated assumptions. Rather, it reflects a phased approach that balances the need for comprehensive planning with the practicalities of managing a dynamic system. These additional studies, combined with continuous monitoring, allow for a more targeted and effective response to site-specific conditions. › The measures proposed in the ESMP are designed to be both proactive and reactive. They include strict protocols for groundwater protection, such as controlled excavation techniques, erosion and sediment control measures, and spill management plans. In conclusion, while assessing groundwater impacts in a karst environment comes with inherent uncertainties, the combination of detailed baseline studies, real-time monitoring, and adaptive management ensures that potential impacts can be effectively mitigated. This approach reflects a

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Livcina source, which is located in the immediate vicinity. Therefore, it is necessary to pay special attention to collect the tunnel runoff, bring it out of the tunnel and treat it before discharging into the recipient. If caverns or karst channels appear, they should never be filled with excavated material or discharge point for tunnel runoff. In the event of an underground flow, it is necessary to create a bypass so that the groundwater can continue to circulate so that it does not exert pressure on the tunnel structure.		commitment to protecting sensitive groundwater resources while maintaining the flexibility needed to address the complexities of the system during construction. Regarding regulations, Chapter 8.3.1.2 Assessment of Potential Impacts Along the Motorway Alignment, provides a detailed explanation of the planned measures. These include the training of the Suhi potok stream (length: 1,280 m) and the regulation of the Bijela stream (length: 600 m). For aspects of underground fauna, please see previous answers.
Further on, from the Konjic South Interchange to the entrance to the Prenj Tunnel, the motorway route was designed in an embankment along the eastern valley side of Konjicka Bijela. This section of the route passes over glacial (moraine) and talus deposits, which are built of slightly rounded pieces of limestone with crushed material and the presence of humus and clay particles. Groundwater flows much more slowly through such materials compared to karstified limestone. This variant of the motorway on the embankment is much more acceptable and more economical compared to the previous variant, which envisaged a route further east in the scree zone, where the upper section would be in the cut and the lower section in the embankment. In this way, the	This is interesting information that should be added to the Alternatives chapter, along with information on whether other variants in the Bijela valley were considered that would have lower impacts on the river and beech forests.	Thank you, this information is added in the chapter 3.4.2 Analysis of Alternative Routes.

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construction of a large number of retaining walls and geotechnical anchors required for the stabilisation of scree slopes was avoided.		
Chapter 8 – Surface Waters		
Surface Water Quality Along the Main Motorway Route 'All these uncertainties lead to a conclusion that it is mandatory to repeat baseline measurements before the start of construction.'	This should have been done before the completion of the ESIA – there has been plenty of time since the original measurements were done in 2021.	Chapter 19 ESMP, specifically item 19.3 on Surface Water, clearly stipulates that during the pre-construction phase, "pre-construction water quality measurements should be performed to assess changes as construction works progress". The water quality results revealed a one-time elevated mercury concentration, which was not detected during the second round of testing. The sporadic nature of this finding makes it challenging to pinpoint a definitive source of the elevated mercury levels. Potential contributors in the catchment area include an active quarry, activities within a shooting range, and sewage pollution from individual households, located upstream from the sampling location. However, subsequent monitoring results at indicated that mercury concentrations were within permissible limits, ruling out these upstream sources as likely contributors. Furthermore, soil quality testing, as detailed in Chapter 13.2 of the ESIA, did not reveal elevated levels of heavy metals, including mercury, further supporting the conclusion that the elevated mercury reading was probably an isolated event without an identifiable ongoing source. Given this context, repeating the baseline analysis was deemed unnecessary. The existing data provides a reliable

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		foundation for assessing surface water quality before construction begins. The ESMP instead emphasises the importance of ongoing water quality monitoring during the construction phase. This approach ensures that any potential impacts from construction activities can be identified and addressed promptly, focusing resources on real-time environmental management rather than duplicating baseline studies.
'It is to be noted here that Suhi Potok (translated as Dry creek) is an intermittent stream and that is dry for most part of the year. The training structure can be constructed in a low flow season without negative impact on Konjicka Bijela or the springs downstream.'	Works can certainly be planned in drier periods, but the experience of recent years suggests that very sudden heavy rainfalls are increasing during the summer across Europe and cannot necessarily be foreseen in advance. It should therefore not be assumed that the stream will remain dry throughout the process.	Given that this stream is dry for the majority of the year, construction works can be safely scheduled during the dry periods in the summer months. The stream's water flow is primarily influenced by snowmelt from the Prenj mountain range, which occurs during the spring months. However, it is notable that summers in this region have been consistently getting warmer and drier in recent years, with droughts becoming more pronounced. This seasonal pattern provides an opportunity to plan construction activities in alignment with long-term weather forecasts, ensuring that work can proceed during the driest months of summer. However, to address potential challenges, measures for managing torrential flows have been detailed in the Chapter 9 Climate. Additionally, the River Crossing Management Plan includes the following provision, as specified in the ESMP: "Avoid works in watercourses during high-flow seasons and periods of heavy rainfall".

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'For the purpose of preserving the Bijela and Gornja Bijela spring (water supply from Crno Vrelo) from the impact of high waters from the river Bijela, an additional regulation of the natural riverbed of the river Bijela over a length of approximately 600 m is planned. This will prevent the tap water supply from being endangered by potential changes in water quality in the riverbed of the Bijela river.'	So in fact the main river in an Emerald site will be channelled for almost 2 km, but this is not examined at all in the Appropriate Assessment.	Noted, this has been addressed through identification of potential impacts on sensitive fauna species (primarily ichthyofauna) through the Screening stage to the Appropriate Assessment, as part of Table 16 (p. 101-102) and chapter 5.1 Habitat loss of the Appropriate Assessment (p. 115).
'On the Konjic bypass side, the Neretva River will be crossed with the bridge at the location of the Donje Selo settlement which is located on the right Neretva Bank (Figure 8-6). The model of the bridge structure is still not known; therefore, it is not known whether there will be any bridge piers constructed in the riverbed. Thus, it is assumed that construction works on the bridge will be performed around and in the Neretva River with possibility of direct release of polluting substances into surface water. During the summer season, the flow of the Neretva River at the bridge location is low enough to allow for work to be carried out in the nearly dry riverbed.'	This contradicts other sections which pledge that there will be no construction in the riverbed.	The ESIA was drafted based on the Conceptual Design for the Konjic Bypass, which did not include details regarding the piers at that time. The new Preliminary Design, offering more detailed specifications compared to the Conceptual Design, outlines the planned construction of Bridge M1 in the settlement of Donje Selo. The bridge spans 387 meters in length, comprising 12 piers spaced at approximately 30-meter intervals, with two of these piers positioned within the riverbed. The bridge is a prestressed reinforced concrete structure, that begins at km 0+314 and ends at km 0+701 of the Konjic bypass length. The width of the driving lane is 3.25 meters, and the shoulder widths are 0.3 meters, while the width of the safety zone up to the guardrail is 0.8 meters. The more detailed specification of the Konjic Bypass, including bridge M1, has been revised in accordance with the Preliminary Design and is included in Chapter 3.2.5 of the Chapter 1-5 of this ESIA. Also, mitigation measures are required for both construction on riverbanks and within riverbeds in River Crossing Management Plan. These

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		measures are further updated (revised and clearly specified – to include both types of construction) in Chapter 8.4.2 and the ESMP.
Pre-construction/Construction Phase River crossing	This section appears to contradict other sections which state no works will be done in the riverbed. If it is only relevant for Bijela and Tresanica channelling works, this should be clearly stated and different conditions set for the Neretva.	As noted in the ESMP comments below, the Preliminary Design for the Konjic Bypass has been prepared and include works within the riverbed. However, the measure regarding the River Crossing Management Plan applies to both works within the riverbed and on the riverbanks. An explanation, already specified in the responses to the ESMP section, is provided below: Although no work was initially planned within the riverbeds, the Preliminary Design specifies that on the Konjic Bypass, the Neretva River will be crossed by the 387-meter-long M1 bridge near the Donje Selo settlement, located on the right bank of the Neretva River. The bridge spans the existing Sarajevo-Capljina railway, the Neretva River, and the main road M17. It consists of 12 pillars spaced approx. 30 meters apart, with two pillars situated within the Neretva riverbed. These updates are detailed in Chapter 3.2.5 and Chapter 8.3.1.2. Consequently, pillar construction will occur both on the riverbanks (along the motorway route) and within the riverbed (applicable to the Neretva River on the Konjic Bypass). As emphasised in Chapter 8.3.1.2 and further elaborated in Chapter 6, both the Tresanica and Neretva rivers are ecologically sensitive watercourses. By avoiding construction within the riverbeds along the motorway route,

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		the sensitive river ecology will be preserved. However, some mitigation measures for construction activities on the riverbanks must still be implemented to minimise potential negative impacts on water quality and ecosystems, as outlined in Chapter 8.4.2. In conclusion, mitigation measures are required for both construction on riverbanks and within riverbeds. These measures are further updated (revised and clearly specified – to include both types of construction) in Chapter 8.4.2 and the ESMP.
Chapter 9 - Climate		
Overall	The shorter route could indeed reduce CO_2 emissions from fuel combustion, but the projected vehicle numbers seem excessive, so the likely savings seem too high. In addition, unless this is weighed up against the emissions from the manufacture of the construction materials, particularly cement, the calculation is not complete and is likely to overestimate the benefits.	We agree on the vehicle projections. This is why we have presented the projected outcomes for specific years, comparing the scenarios of both implementing and not implementing the Project. This approach allows for a clear visualisation of annual savings, particularly in light of the anticipated increase in vehicle numbers. The data used are official and therefore considered the most relevant. Vehicle data for 2022 and the projected number for 2060 are sourced from the Feasibility Study and Traffic Study. The estimated number of vehicles for 2032 is based on data from the Auto-moto Club of Bosnia and Herzegovina. Please note that the current M17 section is nearly twice as long as the planned motorway. Additionally, due to congestion (resulting in start-stop conditions on the existing M17 route), higher emissions are anticipated on the M17.

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		The assessment of project lifecycle emissions did not include emissions from the production of construction materials (i.e. embodied or upfront carbon), as it is not standard practice to account for such emissions in project-level GHG assessments. This approach is consistent with widely accepted methodologies and the requirements of international financial institutions, which typically exclude upstream emissions due to: (i) the difficulty of accurately sourcing data on the origin and production processes of materials, (ii) the limited control or influence project developers have over global supply chains, and (iii) the need to maintain consistency and comparability across different project assessments. An explanation has also been added in Chapter 9.3.2.
GHG emissions 'The assumed number of vehicles that will operate in 2032 was calculated based on data from the Auto-moto Club of Bosnia and Herzegovina on the increase in the number of registered vehicles in 2021 compared to 2020, with the assumption that this growth trend will be maintained until 2032.'	Due to Covid during 2020 there is a high likelihood of such a calculation giving wrong results. It should be updated with 2022 and 2023 data and appropriate projections made.	We agree that 2020 may not be fully representative. However, we have reviewed the official data on the number of registered vehicles from the Auto-moto Club of Bosnia and Herzegovina: › 2020: 1,108,711 › 2021: 1,152,743 › 2022: 1,184,758 › 2023: 1,233,783 The increase from 2020 to 2021 was 3.97%, from 2021 to 2022 was 2.78%, and from 2022 to 2023 was 4.14%. This results in an average annual increase of 3.63% over the past three years. Considering this average and the 4.14%

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		increase in the most recent year (2022), we believe the Study's annual growth estimate of 3.97% is relevant and reasonable.
'It is assumed that the percentage in registered diesel and petrol vehicles will remain constant in the period 2022-2032. The fact that in 2050 10% of electric vehicles will be used in BiH[79], i.e., the assumed 13% in 2060, is considered in the calculation of vehicle type number in 2060. Also, it is assumed that the type or proportion of engines will remain approximately the same.'	Although it is difficult to predict and Bosnia and Herzegovina has not so far had a high uptake of electric and hybrid vehicles, there are signs that this is starting to change. Therefore, this estimate seems likely to be rather low, especially as a de facto ban on selling cars with internal combustion engines in the EU after 2035 has been put in place. If Bosnia and Herzegovina plans to join the EU, it will need to apply the same rules.	The calculation has been updated to reflect the projected number of electric vehicles in Bosnia and Herzegovina, based on available scientific research: 1.08% by 2032 and 33.37% by 2060. Please refer to Chapter 9.3.2 for more details.
Urban buses standard (Table 9-10 and Table 9-12)	These may be used for the baseline but they should not be using the motorway.	This refers to general (passenger) bus projections, with the fuel type categorised as 'urban standard buses'. The terminology will be aligned accordingly in the updated ESIA package (Table 9-10 and Table 9-12).
Footnote 80: Feasibility Study Section: Konjic (loop Ovcari) – loop Mostar North, 2016	Is there really no more recent feasibility study to cite?	Unfortunately, no – this data refers to the Traffic Study for the Section of Corridor Vc: Konjic (Ovcari Interchange) – Mostar North Interchange (2016) and is therefore considered the most relevant for the calculation.
'Although there is an increase in emissions by years due to the increase in the number of vehicles (projected increase of 300.3% in 2060 compared to 2022), it is obvious that the construction of this motorway will have a positive impact on the	A 300% increase in vehicles seems like a lot. What are the assumptions behind this?	Please refer to the first comment under this "Climate" section. Vehicle data for 2022 and the projected number for 2060 are sourced from the Feasibility Study and Traffic Study. The estimated number of vehicles for 2032 is based on data from

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reduction of GHG emissions compared to the use of the existing M17 main road.'		the Auto-moto Club of Bosnia and Herzegovina; and therefore, are considered as the relevant for the calculation.
Chapter 14 – Landscape		
The photomontage of the motorway in the natural environment was not available.	Without a simulation of how the motorway will look, this section of the ESIA does not serve its purpose. This is particularly important for the visually scenic areas in the Bijela valley and around the Klenova draga/Podgorani/Humilisani areas, but also for the Konjic bypass and southern link road. At minimum this section should include visual simulations of: - The view of the southern Prenj tunnel exit area and viaducts/further tunnels from the current M17 road near Potoci - Views of the motorway from Podgorani village - Views from different inhabited parts of the Bijela valley - A view of how the embankment with the Bijela stream channelled underneath will look - A view of the tunnel dug-out waste site in Humilisani and other waste disposal sites	Chapter 14 Landscape and Visual Amenity of this ESIA was updated with the Visibility Analysis. As part of this analysis, Zones of Theoretical Visibility models including "Bare Earth" and "Woodland Screening" were prepared in order to define the extent of the visual impacts in the surroundings. After this, the visual receptors were identified and confirmed during the site visit. Accompanying photomontages have been created to illustrate the interactions between the proposed development and visual receptors, providing a clearer understanding of how the Project will affect the surrounding environment. Photographs for photomontages were taken solely from publicly available locations (such as local community squares and roads). Certain photograph's locations for photomontages had to be modified to reflect the actual conditions on the ground, including vegetation, the position of structures, and the terrain's morphology, in order to appropriately depict the Project's location in relation to the surrounding environment. A photomontage of the spoil disposal site in Humilisani was not prepared because the site visit determined that the location is difficult to access, and it would not be possible to capture a photograph that adequately represents the landfill. Additionally, there are no sensitive visual receptors in the area that would have a view of the disposal site. Instead, a photomontage was created

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	- Views of the bypass and southern link from various parts of Konjic. - Views of different variants for the Bijela and Podgorani sections (however these are not currently assessed in the rest of the ESIA either). Without such simulations to prepare people for how the motorway will look, there is a high risk of increased resistance to its construction at a later stage, once people understand how it will look in relation to their houses and land and how it will affect currently scenic areas.	from the vantage point of the local road in Humilisani, as this view is shared by the majority of visual receptors in the area. Following photomontages were prepared: › Polje Bijela settlement, the confluence of the Bijela river into the Neretva, › Polje Bijela settlement, local road between residential objects, › Bijela settlement, local road near residential objects, › Klenova Draga, a road leading towards the canyon, › Podgorani settlement, road between residential objects, › Humilisani settlement, road through settlement, between residential objects, These photomontages, along with the corresponding descriptions, are presented in Chapter 14 Landscape and Visual Amenity.
Chapter 15 – Waste and Materials		
Overall	There is a clash between the waste disposal plans and the need to avoid damage to the Bijela canyon Emerald site which is not explored either here or in the Appropriate Assessment.	Regarding disposal sites, they are described in Chapters 3.2.11 and 15.3. The proposed disposal areas are the Konjic Municipal Solid Waste Landfill and the Humilisani disposal site. In collaboration with the designers, special attention was given to the placement of the disposal sites to avoid protected areas and water protection zones. The current position of the sites is the result of this collaborative effort. As shown in Figure 4 of Annex E Appropriate Assessment, neither of these disposal sites is located within areas of concern. Additionally, it is specified that the total surveyed

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		area that might be under (in)direct impact within potential Natura 2000 sites is approx. 3,335 ha, and within candidate Emerald sites, it is 2,368 ha. The area under direct permanent impact from the Project in the potential Natura 2000 site Zlatar is 1.54 ha (short road segment between Tunnel T1 and Tunnel T2), and in the Prenj-Cvrsnica-Cabulja site, it is 23.05 ha (road layout, including embankments; the disposal site will be created on the motorway footprint, and the inert waste generated by the construction of access roads to the Prenj Tunnel and the Prenj Tunnel itself will be used by the contractor for embankments, thereby avoiding the need for additional disposal sites). In Chapter 15.3, it is directly specified that the Konjic Municipal Solid Waste Landfill is not within any potential protection zones, and that the Humilisani disposal site is outside Emerald protected areas. For further clarity, it is also noted in Chapter 15.3 that the Konjic Municipal Solid Waste Landfill is outside the Emerald protected areas. In part of the Bijela canyon area, generated inert material will be used for landscaping. Since this will avoid the need for additional (permanent) disposal sites in the area, no negative impacts are expected. This explanation is provided in Chapter 15.3. Moreover, as specified in Chapter 6.2.5, once the landscaping is completed up to the final elevation, the areas will be greened to blend with the surrounding environment. Greening must be done with autochthonous plants that are characteristic and appropriate for the biotic and abiotic

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		conditions in the intervention area, and in accordance with the future Land and Habitat Restoration Plan.
Assessment of impacts	See comments on section 3.2.11 in Chapters 1-5 of the main study.	The changes reflected in this Chapter are consistent with those introduced in the ESIA.
Chapter 16 – Social Impact Assessment		
General comment	The ESIA lacks the following description required by the EIB's Standard 1: *'The description of the country and/or sector context relevant to the specific social-related risks at project level, such as human rights, labour conditions, enabling environment for public participation, gender-based and other types of violence and harassment, including risks of reprisals, socio-economic inequalities including those related to gender, as well as any impacts and risks specific to conflict-affected and fragile situations.'*	The ESIA includes detailed baseline analyses at both federal/cantonal and project-specific levels. It examines demographics, economic conditions, employment, income sources, education and infrastructure at the broader level, while offering deeper insights into population characteristics, land use, access to services and vulnerable groups within the project area. Impact assessments are context-specific. Public participation issues are thoroughly covered in the Stakeholder Engagement Plan (SEP). However, the ESIA has now been updated to provide a more comprehensive analysis of labour and employment conditions relevant to the project, with a particular emphasis on common risks associated with the motorway construction sector. The analysis now also includes expanded chapter on vulnerable groups, with sections dedicated to institutional framework on BiH and FBiH level for human rights protection, legal and policy framework for protection of human rights and in-depth analysis of vulnerable groups among surveyed population. These expanded sections now appear in ESIA Chapter 16, subchapter 16.6.5. and 16.8.6.

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Methodology of Baseline Data Collection Survey methodology The survey was based on a household (HH) and business questionnaire. Questionnaires for households were conducted with the head of the HH or, in case of his/her absence, other adult HH member.	Conducting surveys only with HH means that in many cases women and vulnerable groups like elders might have been omitted.	The survey aimed to engage both genders, with surveyors specifically requesting to speak with both male and female heads of households and explaining the purpose of the survey/project. In some cases, this was not possible (there were instances where women may simply be unavailable or chose not to participate). The responses of the surveyed individuals, which included 61% and 39%, are presented in the ESIA Chapter 16 (Subchapter 16.6.5.3. Vulnerable Groups among Surveyed Population).
Sections 16.5.2, 16.5.3, 16.5.4	Since the *Strategija razvoja Grada Mostara 2022.-2027.* was published in 2021, it is not clear why data from this strategy is not used for the section on economy (16.5.2) and education (16.5.4), although the equivalent strategy from Konjic is cited. Regarding employment, the Konjic and Mostar strategies also contain newer data than the ones used from the 2013 census. In addition, the fact that the '*Statisticki bilten Sluzbe za zaposljavanje Hercegovacko-neretvanske zupanije/kantona, Mostar*' from 2020 was used to determine the qualification structure of unemployed people suggests that other sections may also have been able to benefit from more updated data than those from the 2013 census.	For consistency and comparability across all sections of the ESIA, data from the 2013 Census was primarily used as it provides a standardised and comprehensive demographic and socioeconomic baseline at the national and local levels. The strategies for Mostar and Konjic, while valuable, often focus on projections or partial datasets specific to their development goals. Where more recent and specific data from these strategies was directly relevant, such as employment statistics, it has been incorporated into the analysis and explicitly referenced. All relevant data from the "*Strategija razvoja Grada Mostara 2022.-2027"* and the "*Strategija razvoja Opcine Konjic 2018.-2027"* have been included and appropriately referenced in the respective sections of the document (Chapter 16.7.2 Economy; Chapter 16.7.3 Employment, Income and Livelihoods; Chapter 16.7.4 Education)

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	For example, p.16 of the Mostar development strategy provides 2020 data on employment.	
Cantonal and city development strategies[13] also recognize the importance of Corridor Vc. In development strategy for Herzegovina-Neretva Canton and City of Mostar, Corridor Vc is seen as an opportunity to connect with Croatia and accelerate tourism and economic development. Similarly, in development strategy of City of Konjic, Corridor Vc passing through the City is also highlighted.	This is an exaggeration as the Konjic strategy only mentions the project once, and only in a very neutral way: 'In addition to the basic main M-17 road, the route of the motorway on Corridor Vc, whose construction is in its preparatory phase, is planned to pass through the District of Konjic' (p.4) P. 22 of the Mostar strategy mentions the importance of transport infrastructure in general (road, rail and air), but Corridor Vc itself is only mentioned in passing in the point about plans regarding the city's wholesale market.	The text in Chapter 16.7.5 Infrastructure has been revised to accurately reflect the context in which Corridor Vc is mentioned in the development strategies of Herzegovina-Neretva Canton and cities of Konjic and Mostar.
Section 16.6.1.1	Again these data are quite outdated, and there is no data at all for five settlements, while gender data is missing for Donje Selo as well. Will this be updated via surveys for the Land Acquisition and Livelihood Restoration Plan?	The data used is based on the official information available from the 2013 Census. Unfortunately, there are no updated data beyond general population movement projections, which do not provide specific forecasts for settlements or cities, as a new census has not been conducted in recent years. Additionally, there is no data available for these settlements in the 2013 Census, likely because they are very small and are probably considered part of slightly larger settlements. We recognise the importance of updating this data, and therefore, we will ensure that additional surveys and research are carried out during the preparation of the Land Acquisition and Livelihood Restoration Plan to gather the most current information.

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Tabela 16-13: Etnička pripadnost stanovništva šireg projektnog područja u Mostaru **Br.** **Naselje** **Ukupno** **Muškarci** **Žene** **#** **#** **%** **#** **%** **1.** Humilišani 1.161 577 49,7 584 50,3 **2.** Potoci 2.183 1.091 49,9 1.092 50,0 **3.** Podgorani 614 306 49,8 308 50,1 **4.** Kutilivač 1.624 798 49,1 826 50,8 U tabeli ispod prikazani su detalji o spolnoj strukturi stanovništva. U sva četiri naselja skoro podjednako su zastupljeni muškarci i žene. *Tabela 16-14: Spolna struktura stanovništva šireg projektnog područja u Mostaru* **Br.** **Naselje** **Ukupno** **Muškarci** **Žene** **#** **#** **%** **#** **%** **1.** Humilišani 1.161 577 49,7 584 50,3 **2.** Potoci 2.183 1.091 49,9 1,092 50,0 **3.** Podgorani 614 306 49,8 308 50,1 **4.** Kutilivač 1.624 798 49,1 826 50,8	In the local language version the two tables show the same data.	Thank you for bringing this to attention. The correction has been made in the local version of the ESIA Study.
Vulnerable Groups Of the total surveyed households living in the wider study area, 30% are returnees after the 1992-1995 war. Around a third of these reported that they have received some assistance from state or foreign authorities (e.g., housing reconstruction donations). The representative of the local community Bijelo Polje informed the Consultant that there is a certain number of Serb returnees and a smaller number of Croat returnees on the motorway section, but that no one has raised any concerns about motorway construction. The representative of the local community Bijela and president of the NGO "Association of Serb returnees Neretva" Konjic reported there are Serb returnees in the	It indicates that war refugees are impacted, but the justification for not granting them vulnerability status (although p.36 enumerated 'returnee status' among the vulnerability criteria) is very weakly justified, based only on the opinions of heads of communities that "no issues were raised'. Overall the socio-economic data on war returnees is very scarce in this section. Their situation was not quantified or described in socio-economic terms and the assessment does not assess the position of war returnees in society, nor their ethnicity and its implications. Based on the experience from the section south of Mostar, our opinion is that all returnees should be treated as vulnerable in the sense of	The Chapter 16.8.5 on vulnerable groups has been revised and expanded. Returnees are now explicitly recognised as part of the vulnerable groups considered, and the relationship of their vulnerability to this particular Project has been further clarified.

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settlement, but they also did not raise any concerns regarding motorway construction. The representatives of the local communities Dzepi, Centar and Tresanica, including the Donje Selo branch office, did not report any returnees or raise any issues about the returnee population either. Therefore, the returnee population has not been found to be vulnerable (taking particularly into account the fact that displacement occurred around 30 years ago), unless they are identified as vulnerable based on other vulnerability.	the EBRD Environmental and Social Policy (not necessarily in the sense of the FBIH Law on Expropriation). Their experience of repeated upheaval, their connection to their land and need for a sense of home means that additional efforts are needed to properly consult them about the project and take their needs into consideration. It is highly risky to consider them non-vulnerable on the basis of second-hand reports that they had not yet raised any issues with the motorway. The main design has not yet been completed so it is not even clear exactly which houses will be affected, so it is much too early to conclude that there are no issues. If there are issues, they will likely arise once the main design is done, and people understand how close the motorway will run to their houses or that they need to be expropriated. The point of identifying people as vulnerable is precisely to ensure that such issues are recognised as early as possible and measures taken to ensure they do not suffer from the construction.	
Vulnerable Groups During the socio-economic surveys, vulnerable households have been identified in the Project area of influence. Approximately a third (32.6%) of surveyed households answered the question	Single headed women households (especially those with small /school children) are not listed as vulnerable. Are there such households along the route? And if so, why are they not included?	The new expanded vulnerability assessment (Chapter 16.8.5) within ESIA Chapter 16 now includes more details on females and children, but additionally also considers and assesses some new categories as vulnerable – youth, elders, single

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regarding the vulnerability of household members. Of these: 49% of HH have a member with a chronic illness requiring regular medical care, 19.1% of HH have a member with a physical disability, 12.8% of HH are elderly people living alone, 10.6% of HH mentioned other problems as vulnerabilities (disabled war veterans, disabilities, previous surgery), 6.4% of HH have a member with a chronic illness that requires hospitalization and 2.1% of HH have a member with mental disability.	Children are non-existent in this assessment.	households, single parent households and households with more than 2 children. It is to be noted that pre-project existing vulnerabilities will be subject to further assessment and development specific mitigation measures depending on the type and the timing of the project impacts.
Vulnerable Groups In addition to these vulnerable categories, another potential vulnerable group should be considered – the female population in the settlements in the vicinity of the motorway section which represents around half of the total population in Mostar and Konjic. Female population is the majority in the settlements of Donje Selo, Ovcari, Galjevo and Repovica in Konjic. Based on the results of socioeconomic survey conducted in the study area, more than half of household members are women, and around 19.7% of the households are female-headed.	No definite decision was taken in respect to women as a vulnerable group. This needs to be clarified. No further proposal is provided on how this vulnerability should be addressed. The issue of gender equality in access to compensation is not assessed - the issue of land ownership in marriages, joint accounts, joint assets - and in consequence relevant mitigation measures were not proposed to ensure that women will be treated equally and will be entitled to compensation.	Chapter 16.8.5 Vulnerable Groups within ESIA Chapter 16 has been revised and expanded to clearly highlight the inclusion of women as a vulnerable group. We have now clarified the specific vulnerabilities of women in relation to this project. Issues regarding land ownership within marriages, joint accounts, and joint assets will be addressed in more detail within the LARPs, where appropriate mitigation measures will be proposed to ensure that women (and other vulnerable groups) are treated equally and entitled to compensation. Specifically, LARF entails that assistance for livelihood restoration (where applicable) will be identified by JPAC and be equally available to men and women
Economic activities in the wider study area were analysed based on site visits by the Consultant and	16 businesses seems quite limited - what is the percentage of the total identified businesses in the buffer zone of the route? Also, it is noticeable	The information about identified businesses within the buffer zone has been included in Chapter 16.6.6 - Local Economy. As for agricultural activities carried out by households, it is important to clarify that these were not part of the business

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the socio-economic survey conducted among households and 16 businesses. The local economy of the Project area is based mainly on agriculture and tourism related activities, as well as some metal processing and construction. Agricultural activities are very common in the settlements of Ovcari, Bijela and Kutilivac. The settlements of Gornje Polje and Polje Bijela are characteristic for rafting centres and activities (along the Neretva River and Bijela River), with tourism activities included.	that no agricultural businesses were interviewed. The results of the survey presented on p.39 seem to stop half way through and need to be completed. The questionnaire provided as an annex also included questions on impacts, which we expected might be presented in the sections on impacts, however we did not find an explicit reference to the survey of businesses there either.	survey, as they are not registered as formal businesses in official records. However, the household survey revealed that many households engage in agriculture primarily for personal use rather than as formal, registered commercial activities. The results of the business survey have been thoroughly analysed, and all relevant information gathered through the survey are already presented in Chapter 16.6.6 - Local Economy. The current section provides baseline data and is not intended for detailed elaboration on impacts. Additionally, insights from businesses regarding anticipated impacts have been integrated throughout Chapter 16.8 - Assessment of Impacts.
Assessment of Impacts	No impacts are identified in relation to vulnerability factors, nor specific impacts on war returnees. No impacts on livelihood were analysed, especially in relation to specific vulnerable groups. The ESIA does not include all the required information under the EIB Standard 1: *The description of the environmental, climate and/or social aspects[28] likely to be affected by the proposed project, including comprehensive and context-specific identification and analysis of people and communities likely to be affected, as well as other relevant stakeholders, paying particular attention to persons and/or groups that are vulnerable, marginalised, discriminated*	The assessment of impacts on vulnerable groups (including war returnees) and livelihood impacts, have been included in the ESIA. Specifically, Chapter 16.8 Assessment of Impacts now addresses vulnerability factors and provides a comprehensive context-specific analysis of how these groups may be affected by the project. This includes detailed assessments of social and economic impacts on marginalised or excluded groups, in line with the EIB Standard 1 requirements. The updated ESIA also incorporates the relevant measures and strategies from the LARF and SEP to ensure these groups are effectively engaged and supported throughout the Project.

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	against or excluded on the basis of their socio-economic characteristics. Assessment of the likely significant environmental and social effects of the proposed project (also taking into account the outcomes of any complementary assessments and/or focused studies as referred to in paragraphs 9 and 10, if applicable), resulting from inter alia: *(...)* *e. the risks to human health, well-being, persons and/or groups that are vulnerable, marginalised, discriminated against or excluded on the basis of their socio-economic characteristics, cultural heritage or the environment;* *(...)*	
Mitigation and Enhancement Measures	No measures are proposed at all in relation to specific needs of vulnerable groups. In general, there is no assessment of the impacts on vulnerable groups. The ESMP does not propose any specific mitigation measures targeting vulnerable groups. We understand from the Open Days that a Land Acquisition and Livelihood Restoration Plan is planned once the main project is done, but we still think the *type* of measures to be	The ESIA Chapter 16.9 Mitigation Measures has been updated to include specific measures for vulnerable groups, addressing their needs and potential impacts. Although detailed information on vulnerable individuals is not yet fully available, the types of support and mitigation measures have been clearly outlined. These measures will be further refined through the development of the Land Acquisition and Livelihood Restoration Plans. Additionally, the ESMP has been updated to reflect these measures for effective implementation.

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	implemented should be included here, even if the number of people involved is not yet totally clear.	
Questionnaire for Households VULNERABILITY Table	Single mothers of small/school children are not listed as vulnerable but should be.	Chapter 16 (specifically, sub-chapter 16.8.5.1 Vulnerable Groups among Surveyed Population) now specifically addresses children and single-parents as one of the key vulnerable groups in context of the motorway construction. As mentioned in the answers above, new vulnerable categories had also been added and considered, and now include: financially vulnerable households, returnees, single person households, single parent households, families with more than two children, children, youth, elderly, persons without formal education/or with primary education only, and persons with physical/mental disabilities and/or chronic illnesses and pregnant women.
Chapter 19 – ESMP		
Overall	The ESMP does not propose any specific mitigation measures targeting vulnerable groups.	ESMP has been updated and now includes specific measures regarding vulnerable groups.
'Prior to commencement of construction, select inert waste disposal sites and borrow pits and access roads for them, machinery parking spaces, other access roads, service plateaus, fuel containers, construction worker camps and other (temporary) infrastructure.	The requirement on p.92-93 is stricter than that on p.8. These should be aligned towards the stricter requirement on p.93.	Thank you. The measures were conjoined under ESMP measure 19.1.1 to include both measures relating to terrestrial as well as aquatic environments as given on pages 92-93.

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Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
Selection of these localities must be based on minimal impact on environmental and social receptors, including natural habitats. Infrastructural elements must not be established in critical habitats (CH) or within priority biodiversity features (PBF) unless there is no other viable option based on analysis of environmental, social and financial criteria, which must be agreed upon by the Lenders and accompanied by mitigation and compensation (if necessary).' 'In case the Contractor decide to open the borrow pits instead of material purchase, the following measures shall be implemented: (...) Materials shall not be borrowed from the Neretva River. The Contractor is not permitted to open new extraction pits within this river basin. Borrow pits may not be opened in protected areas in line with the national and EBRD and EIB requirements.'		
Develop and implement Biodiversity Offsetting Plan (BOP). The guidelines and recommendations for development of BOP are given in the BMP.	See comments on Biodiversity chapter, Appropriate Assessment and Critical Habitats assessment. It is not in line with the EIB/EBRD policies or the Habitats Directive to jump straight to offsets/compensation without completing all steps of the assessments, demonstrating the project's compliance with the	Noted, those will be addressed in the respective parts of the comment matrix. BMP refers to the Biodiversity Management Plan (Volume 4 of the ESIA Disclosure Package).

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	EIB/EBRD/Habitats Directive criteria including absence of alternatives. In addition, as mentioned elsewhere, the EIB's standards practically prohibit offsets in critical habitat, and in general offsets should be avoided as they almost never work in reality. In addition, which document exactly is meant by the BMP? Although the Biodiversity chapter contains various measures, none of it is labelled as a BMP.	
No construction activities in the riverbed of Neretva. The bridges shall be constructed without any disturbance of the riverbed. In order to protect fish species and their habitats, including species at risk, from development activities it would be necessary to reduce or eliminate constriction of flow through structure design. No river training of Neretva and its shoreline is allowed, and no interference of the natural flow rates is allowed. Design and install culverts near streams to prevent creation of barriers to fish movement.	It is not clear how this will be done in practice and how impacts on Neretva by construction will be prevented (there should be temporary bridges in Neretva?, turbidity of springs could happen according to Chapter 7, etc.). ESMP should be much more detailed and/or ESIA should be amended to include the new designs of the 2 bridges over Neretva and 1 on its tributary.	There will be a total of two bridges across the Neretva: one on the motorway route and the other on the Konjic Bypass. › The first bridge, part of the motorway route, is the M3 bridge, with a left span of 557.5 meters and a right span of 657.5 meters, located in the Donja area. The left span consists of 10 piers, while the right span has 13 piers. Notably, the piers will not be placed in the riverbed, and the distance between the piers at the point where the bridge crosses the Neretva is approximately 60 meters. › Bridge on the Konjic bypass is located in a settlement of Donje Selo. It's a 387-meters-long bridge, comprising 12 piers spaced at approximately 30-meter intervals, with two of these piers positioned within the riverbed. There will be no temporary bridge structures on the Neretva River. The Chapter 1-5 has been updated according to details from Preliminary Design of the Konjic Bypass. Furthermore, measures related to works within riverbeds and on riverbanks

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		have been defined, and further specified, in Chapters 8 and 6.
Additional small scale rapid surveys completed for amphibians, reptiles, and birds BMP section on fauna updated prior to construction CHA updated with new information if necessary In the year of construction, but before any works commence, perform eDNA analysis in order to valorise underground fauna not accessible by standard invertebrate surveying methods. Focus on the area where works are planned near and in Mountain Prenj. Additional baseline surveys with the aim to confirm findings from 2020-22 should be planned for all fauna if the pre-construction phase begins more than three years after the completion of large-scale ESIA Study surveys (2021).	This should be part of the ESIA (and not left for afterwards) as it might change a lot the conclusions of the assessment.	Please see this elaborated in answers above.
During the construction period, underground cave systems and caverns with cave organisms may be encountered. In case of encountering underground structures, it is obligatory to suspend the works immediately, as soon as safe to do so. All cases of such systems opening must be reported to the Lenders. Pending approval, a speleological company, NGO, or other competent entity must be hired to	Those cave systems should be previously mapped.	

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examine the significance of open systems and to safely seal and separate underground habitats from tunnel systems.		
Regarding mammals, mitigation measures during the construction period refer to avoiding tunnelling and extensive excavation works in the period from March to May, when the largest number of species give birth to offspring. Prohibit work near water bodies during the spawning period and migrations of fish (April and May). Protective panels must be placed on both sides of the road at a height of 1.5 m. Removal of vegetation will make habitats less tempting, and cars will be easier to spot, which should reduce bird mortality due to collisions with moving cars.	The mitigation measures on disturbance do not take account the opening for people and machinery of the Klenova Draga gorge which is very wild. There was not enough research of large mammals there, explaining why bears, chamois and wolf were not found there. Protective panels should be at least 3 m high to avoid collisions with trucks. Destroying the habitat of some birds along the highway by removing the vegetation cannot be a mitigation measure.	The Balkan chamois generally resides at elevations above 1,000 m above sea level. Lower-altitude areas near the southern portal of Tunnel Prenj are less likely to host the species due to unsuitable habitats and lack of suitable food sources as Klenova Draga and its surroundings are predominantly covered in deciduous forest. As a result, the impassable and rough terrain in Klenova Draga cannot be considered a permanent habitat of wolf of brown bear. Thank you, the requirement for the height of protective panels has now been altered and the measure for vegetation clearance is now removed.
Conduct a detailed inventory to identify all wells for public water supply, wells for individual water supply (drinking or other purposes), newly built wells for supplying construction locations with drinking or technical water, and piezometers installed at the referenced locations related to motorway construction.	This data should be collected in the ESIA	The detailed inventory of wells has not been conducted at this stage as the measure is intended to be implemented closer to the start of construction to ensure the most accurate and up-to-date data. This approach is crucial for establishing reliable baseline monitoring and enabling effective subsequent monitoring during the construction phase. The inventory and related monitoring activities will be developed as part of the Groundwater Monitoring Plan.

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		There are several key reasons why conducting the inventory now is not recommended: › Potential changes in well conditions over time: The exact start date of construction is currently unknown, and a significant period may pass before construction commences. During this time, conditions in the Project area could change substantially due to various factors, such as the drilling of new wells, decommissioning of existing wells, or shifts in groundwater usage patterns. Conducting the inventory now could lead to outdated or inaccurate data, which would complicate the monitoring process and reduce its effectiveness. Deferring the inventory ensures that the information collected reflects the actual conditions at the time of construction, providing a more reliable baseline. › Contractor accountability and ownership: By scheduling the inventory closer to the start of construction, the Contractor is directly responsible for the accuracy and comprehensiveness of the well data. This approach ensures that the Contractor has ownership over both the baseline data and the ongoing monitoring process, fostering a proactive and accurate management of any issues that may arise during construction. Conducting the inventory prematurely could lead to a disconnect between on-site conditions and the Contractor's understanding of the water supply situation, potentially undermining effective management. Additionally, it is important to note that the COWI-IPF8 consortium is currently preparing the Land Acquisition and Resettlement Plans (LARPs) for this motorway subsections. These LARPs are expected to be completed by September 2025 and will include a socio-economic questionnaire

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		designed to gather information about private wells within the Project area that may be impacted by the Project construction. This data will be made available to the future Contractor for verification and integration into monitoring activities. However, the Contractor will remain responsible for assessing and verifying the most current conditions before construction begins to ensure accuracy and reliability in the monitoring process.
In case of cutting off underground streams (karst channels or caverns with water) during tunnel excavation, construct a bypass (migration flowpath) to its extension so that the groundwater continues to move and at the same time reduce the pressure on the tunnel tube and prevent damage to the tunnel lining. If the tunnel tube cuts through a cavern of larger dimensions, build a supporting structure (bridge in the tunnel) to bridge the cavern.	See above	Answered above.
Prepare a River Crossing Management Plan (RCMP) that includes a Specific Method Statement. (…) Until the beginning of the in-water works, preserve at least 20 m depth of bankside vegetation… Direct access of vehicles to watercourses should restricted to those vehicles required as part of the construction activities.	This contradicts the measures for protecting Neretva. This may be because it refers to the Tresanica and Bijela, but in that case it should be specified.	Although no work was initially planned within the riverbeds, the Updated Preliminary Design specifies that on the Konjic bypass, the Neretva River will be crossed by the 387-meter-long M1 bridge near the Donje Selo settlement, located on the right bank of the Neretva River. The bridge spans the existing Sarajevo-Capljina railway, the Neretva River, and the main road M17. It consists of 12 pillars spaced approx. 30 meters apart, with two pillars situated within the Neretva

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		riverbed. These updates are detailed in Chapter 3.2.5 and Chapter 8.3.1.2. Consequently, pillar construction will occur both on the riverbanks (along the motorway route) and within the riverbed (applicable to the Neretva River on the Konjic bypass). As emphasised in Chapter 8.3.1.2 and further elaborated in Chapter 6, both the Tresanica and Neretva rivers are ecologically sensitive watercourses. By avoiding construction within the riverbeds along the motorway route, the sensitive river ecology will be preserved. However, some mitigation measures for construction activities on the riverbanks must still be implemented to minimise potential negative impacts on water quality and ecosystems, as outlined in Chapter 8.4.2. In conclusion, mitigation measures are required for both construction on riverbanks and within riverbeds. These measures are further updated (revised and clearly specified – to include both types of construction) in Chapter 8.4.2 and the ESMP.
ESIA volume 2 - Technical annexes		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
Annex A – Habitats, Vegetation and Invasive Species		
Overall	It would be useful to include a map with the age of forests in the Bijela valley and their relationship with the route.	This data is unfortunately not available as the Forest Management Company does not own or collect this type of information. However, they highlighted that the Project area is subject to regular tree felling activities they manage.

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Annex B - Invertebrates		
Overall	No comments in addition to those provided on Chapter 6 Biodiversity, the Appropriate Assessment and the Critical Habitats Assessment.	Noted, thank you.
Annex C-1 – Ichthyofauna		
Ljuta flows into river Neretva approx. 2.1 km north of Konjic.	As far as we know, it flows into the Neretva 4-5 km south-east of Konjic.	Thank you for taking note of the omission. This was altered to say "(…) 2.1 km *upstream* from Konjic.".
Discussion and recommendations	It is unclear why this section does not stipulate the avoidance of building motorway pillars inside river beds. It also needs to assess the impact of channelling the Bijela river on fish species. Although the upper part of the river is dry for part of the year, this does not mean there would be no impacts.	Thank you. The chapter on mitigation was revisited to ensure alignment between all documents. The impacts of channelling of the Bijela river and Suhi Potok on sensitive species have been assessed under Chapter 4.1, p. 17.
Annex C-2 – Herpetofauna		
Lower course of Konjicka Bijela is a permanent water flow, and will not be influenced by the construction since it is not in proximity to the project area.	We are rather surprised to see this, considering 1.2 km of the upper part of the river will be channelled and a dyke built on top of it. We understand that the intention is to carry out works during the dry season as much as possible, but this cannot be guaranteed to be dry all the time and it seems unrealistic that there would be no impact.	Noted, thank you. This aspect was addressed in detail in the Appropriate Assessment as the Annex C-2 primarily focuses on mitigation measures. The purpose of the Annexes is to provide more detail on the collected data without burdening the ESIA Chapter itself, while the Appropriate Assessment (and Biodiversity Management Plan and Critical Habitat Assessment, where relevant) go into more detail on impacts and mitigation.
Annex C-3 – Ornithofauna		

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
	No comments in addition to those provided on Chapter 6 Biodiversity, the Appropriate Assessment and the Critical Habitats Assessment.	Thank you, noted.
Annex C-4 – Mammals (bats)		
During the topographic mapping of speleological sites, for the area of the Corridor Vc section and 500 m from the route, the presence of two caves north of the settlement of Podgorani was recorded (Figure 1). Analysis of the area by field visits has not established that the project activities will have a direct impact on caves and habitats of identified species.	Does this mean they have not established that the project activities will *not* have a direct impact either, or it remains unclear?	Direct impact cannot be expected for speleological objects identified as a part of mapping performed for the purpose of ESIA development. This is clarified now, thank you.
Annex C-5 – Mammals (Large mammals)		
Overall	It would be useful to include a map of the hunting areas cited in relation to the project route, in order to understand their proximity.	Inquiry was made towards the Hunting Association Koznik Konjic to potentially provide maps of the hunting ground. Maps of hunting grounds are unfortunately not available in digitised format.
An overview of mammal species within the study area based on field surveys and literature data **Eurasian otter *Lutra lutra***	During a field visit to the Bijela valley in October 2022, Bankwatch experts found otter scat by the Bijela stream in the Konjicka Bijela valley. As the otter is protected under Annexes II and IV of the Habitats Directive, it should be included in the Appropriate Assessment and Critical Habitat assessment.	The Eurasian otter has been assessed as a species potentially impacted by the construction of this motorway subsection in Appropriate Assessment and Critical Habitat Assessment. This species tends to have relatively large territories which can extend to up to 40 km, and the construction of roads generally can affect the integrity of their habitats. However, it is unclear what this species uses the site for, making it

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		increasingly difficult to set targeted measures for the preservation of their habitats.
Balkan snow vole *Dinaromys bogdanovi* Chamois *Rupicapra rupicapra*	We see it was not found at the location, but for completeness, it is also protected under Annex II and IV of the Habitats Directive. If *Rupicapra rupicapra balcanica*, which we assume it is, given the species' overall distribution, it is also protected under Annex II and IV of the Habitats Directive. Considering that hunters reported it as present, it should be included in the Appropriate Assessment and Critical Habitat assessment if *Rupicapra rupicapra balcanica*.	Thank you for the provided information. The Appropriate Assessment and Critical Habitat Assessment were revised accordingly to include these species.
European wildcat *Felis silvestris*	Considering that hunters reported it as present, it should be included in the Appropriate Assessment and Critical Habitat assessment.	Thank you, the Critical Habitat Assessment was revised accordingly. This species is not a species officially listed of conservation interest for the assessed Natura 2000 sites within a 15 km zone from the Project, and therefore was not included in the

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		Appropriate Assessment. However, all concerns regarding the wildcat were covered through the revised Critical Habitat Assessment.
Annex D – Critical habitat assessment		
Overall	The identification of the species and habitats is clearly explained and justified, and the extent of the impact on some habitats and species is clearly explained. However, no overall conclusion is provided on the project's compliance with the EBRD/EIB's criteria on construction in critical habitats, particularly absence of alternatives, *'the project does not lead to measurable adverse impacts [79] on those biodiversity features for which the critical habitat was designated (...),'* and *'the project is not anticipated to lead to a net reduction in the population [81] of any endangered or critically endangered species, over a reasonable time period.'*	Based on the requirement of the EBRD PR 6 paragraph 13 and 15 and EIB Standard 4 critical habitat must not be further fragmented, converted or degraded to the extent that its ecological integrity or biodiversity importance is compromised. However, construction in critical habitat is allowed **if no other viable alternatives** within the region for development exist that consider habitats of lesser biodiversity value. Absence of alternatives and requirements of the EBRD and EIB that are met by the Project are described in detail in the Critical Habitat Assessment. **Considering Paragraph 15 (EBRD) following criteria with regard to critical habitats are met:** › no other viable alternatives within the region exist for development of the project in habitats of lesser biodiversity value ✓ › stakeholders are consulted in accordance with PR 10 ✓ › the project is permitted under applicable environmental laws, recognising the priority biodiversity features ✓ › the project does not lead to measurable adverse impacts on those biodiversity features for which the critical habitat was designated as outlined in paragraph 14 ✓ › the project is designed to deliver net gains for critical habitat impacted by the project ✓

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
		› the project is not anticipated to lead to a net reduction in the population of any endangered or critically endangered species, over a reasonable time period ✓ › a robust and appropriately designed, long-term biodiversity monitoring and evaluation program aimed at assessing the status of critical habitat is integrated into the client's adaptive management program ✓ **EIB (Standard 4) criteria is met as it follows:** › No other viable alternatives for the project exists either in terms of location or design, and there is rigorous justification of overriding public interest based on human health, public safety considerations and/or beneficial consequences of primary importance for the environment ✓ › The project does not lead to measurable adverse impacts that will result in any detrimental effect on the ecological and conservation status of the critical habitat, and impacts are avoided and minimised to the extent possible through changes in footprint or design ✓ › The project does not lead to a net reduction in the population of any vulnerable, endangered or critically endangered species over a reasonable period of time ✓ › Stakeholders are consulted in accordance with Standards 2 and 7, as defined in paragraph 11 ✓ › Positive conservation outcomes (Net Positive Impact) and continued ecological functionality are achieved though appropriate compensation measures for residual impacts that would otherwise occur despite impact avoidance, minimisation and restoration measures ✓ › A robust, appropriately designed and long-term biodiversity monitoring and evaluation programme aimed

Specific comments: ESIA volume		
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		at assessing the status of the critical habitat is integrated into the promoter's adaptive management programme ✓ Aforementioned was achieved through the review and description of available alternatives, stakeholder consultations, obtaining of the Decision on approval of the EIA, development of the Biodiversity Management Plan, providing information on the number/range of affected PBFs and CHs that demonstrate Project cannot affect their long/term survival.
Methodology - Introduction, CHA process	This section describes the critical habitat and PBF criteria but seems to stop halfway through the process, as the assessment needs to clearly assess the extent of the impacts on the CH and PBF and examine whether the project in question fulfils the EBRD/EIB criteria which allow construction to go ahead in a PBF or critical habitat at all before discussing mitigation or compensation measures.	EBRD (PR 6) and EIB (Standard 4) requirements for avoiding construction in critical habitats and exception in cases of no other alternatives are now included and explained in Chapter 1 Introduction and in chapter 4 Recommendation and Conclusion of Critical Habitat Assessment document. Criteria of EBRD and EIB that are met by the Project can also be seen in the comment above.
CHA Process 'The Criteria outlined by the EIB's Standards are, as aforementioned, comparable to the EBRD Policy. EIB's 2022 Standards provide general criteria but not thresholds for critical habitat designation. Due to this constraint, the assessment relies on thresholds given in the EIB 2018 Guidance Note.'	The EIB's 2022 Standard finds fixed thresholds inappropriate, reasoning instead that: *'13. There are no fixed quantitative thresholds for the fulfilment of each criterion, and they should be evaluated on a case-by-case basis, taking into account the specificities of the area under consideration.* *Reliance on qualified expert advice and association with recognised independent NGOs*	EIB's 2018 Standards include the quoted statement. EIB's 2022 Standards do not have it. However, the usage of 2018 Guidance with the 2022 Standards does not represent an optimal solution. In line with this, the designation criteria have been altered in the Chapter 3; however, a reference to the 2018 Guidance Note was left in the document in order to illustrate what every Criterium may include.

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	and institutions will ensure the robustness and objectivity of the results.' Therefore, using its 2018 thresholds does not fulfil the requirements of the 2022 Standard.	
Species for Further Assessment 31. Golden Eagle Aquila chrysaetos BD I, FBIH VU, Res. 6	In Annex C-3 and the main ESIA it is listed as EN according to the FBIH classification.	Thank you. All conservation statuses in the document have been revised.
Species of conservation concern that occur in the CHA study area Birds	It's not clear why it says in each case only '*Works on the route of Corridor Vc, subsection Mostar North - Tunnel Prenj - Konjic (Ovcari), will not disturb the habitats of the species outside the buffer zone*.' What about inside the buffer zone?	Thank you. The "Comment" column in the CHA was revised for clarity.
Species of conservation concern that occur in the CHA study area Golden Eagle, BD I, FBIH VU 'EOO is greater than 20,000 km2; the species is found in more than 10 localities in BiH, the size of the population in BiH is estimated at 50-80 nesting pairs; the population is stable. The species is widespread in Bosnia and Herzegovina and neighbouring countries.'	This description contradicts the information provided on p.41 of *Chapter 6. Biodiversity* that its status in FBIH is 'endangered'. With a population of 50-80 pairs, it cannot really be said that it is 'widespread' in Bosnia and Herzegovina.	"Widespread" is used in the context of broad geographical range i.e. it is present throughout the country. It is not used as a synonym of "numerous". Altered for clarity.
Species of conservation concern that occur in the CHA study area White-backed woodpecker: 'EOO is greater than 20,000 km2; the species is found in more than 10	This description contradicts the information provided on p.40 of *Chapter 6. Biodiversity* that the population is declining and that it is rare. With a	As above, the term "widespread" is used in the sense that it is present in the entire country, but it is indeed not present in large numbers. Description was altered to be in line with Chapter 6.

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
localities in BiH, the size of the population in BiH is estimated at 350-500 nesting pairs; the population is stable. The species is widespread in Bosnia and Herzegovina and neighbouring countries. Works on the route of Corridor Vc, subsection Mostar North - Tunnel Prenj - Konjic (Ovcari), will not disturb the habitats of the species outside the buffer zone.'	population of 300-500 pairs, it cannot really be said that it is 'widespread' in Bosnia and Herzegovina. *('The White-backed Woodpecker (Dendrocopos leucotos; FBiH VU, BD I), with a population of 300-500 pairs, is one of the rarest and most endangered bird species in Bosnia and Herzegovina. It is an indicator of old and preserved beech forests, with a lot of rotten trees on the ground. Due to intensive forestry and sanitary felling, its population trend is declining.')*	
Based on the requirement of the PR 6 paragraph 15, critical habitat must not be further fragmented, converted or degraded to the extent that its ecological integrity or biodiversity importance is compromised. No net loss of habitats and species that triggered PBF is allowed, and project must be designed to deliver net gains for features that triggered CH. EBRD's requirements can only be achieved through specific and targeted mitigation in line with mitigation hierarchy of avoiding the negative impact to these habitats and species. Mitigation measures for all species of conservation concern have been given in BMP and this ESIA and	The same as with the Appropriate Assessment, there is no clear analysis of whether the project can actually go ahead in this location. It is assumed it can, but the description of impacts on e.g. birds is not clear enough for the reader to understand how this conclusion was reached. Both the EIB and EBRD standards list a set of criteria to determine whether a project can go ahead in critical habitat, which need to be examined one by one. In addition, the sentence '*EBRD's requirements can only be achieved through specific and targeted mitigation in line with mitigation hierarchy of avoiding the negative impact to these habitats and species*' seems to mix	Please see this answered above.

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
must be implemented effectively, adequately and timely.	avoidance – the first priority in the mitigation hierarchy – with mitigation. Avoidance is a sure strategy (for example by changing or adjusting the route), whereas minimising and mitigating harm are lower in the hierarchy as they still result in some harm, and in the case of mitigation measures, they may or may not work.	
Mitigation measures	This section is confusingly named as it sounds like it will be about mitigation measures, but in reality it also examines impacts and the potential for compensation measures. It should be renamed for clarity, otherwise it looks like the brief comments in table 3.1 and 3.2. are the only place that impacts are mentioned.	Thank you, Chapter name is changed to better reflect its contents.
No net loss of aquatic habitats and species will be achieved through specific and targeted mitigation in line with mitigation hierarchy of avoiding the negative impact to aquatic habitats and species.	As above, this mixes avoidance – the first priority in the mitigation hierarchy – with mitigation. Avoidance is a sure strategy (for example by changing or adjusting the route), whereas minimising and mitigating harm are lower in the hierarchy as they still result in some harm, and in the case of mitigation measures, they may or may not work.	As provided in answers to General comments as well as comments on the biodiversity aspects of the ESIA, avoidance was implemented where it was deemed as possible and recommendations were incorporated into the Preliminary Design. Where it was not possible due to other constraints, mitigation and compensation were applied. Please see above for more details.
'Priority habitat type *6220 Pseudo-steppe with grasses and annuals of the Thero-Brachypodietea (CH) is found on a number of locations around the planned route, two of which stand our for	The Critical Habitat assessment proposes compensation for residual impact of several species and habitats that are critical habitat - this is practically prohibited according to the	All of the species meeting the criteria for critical habitats under the EIB Standards are species very common and numerous in Bosnia and Herzegovina. They are characteristic for rocky scrubland that dominates the Project area,

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
protection from negative impacts during construction – a total of four EAAAs in Ovcari and Kutilivac. This habitat must not be disturbed during construction. However, due to the fact that the EAAA in Kutilivac are close to the portal of the tunnel (distance of approx. 100m) some adverse impact might be expected. If any do occur, the Client is obligated to conduct revitalization of said habitats in a larger area than area lost.' Summary of needed compensation for residual impacts on PBF/CH *Zerynthia polyxena* - 'In order to compensate for habitat lost, measures to be implemented are targeted to the habitat Z. polyxena inhabits. (...) Reptiles: P*seudopus apodus* *Podarcis melisellensis* *Lacerta trilineata* *Algyroides nigropunctatus* *Vipera ammodytes* *Platyceps najadum* 'Compensation for aforementioned species can be done on one site as they share a very similar	EIB's Standard 4 because the chances that they would be already functional before the construction is undertaken, as well as complying with the EIB's other criteria, are almost nil.	especially the area south of Mt. Prenj. Due to the sheer size of the suitable habitat, it would be impossible to avoid any impact to the species even if changes to the alignment occur. As such, the first step in mitigation hierarchy – avoidance, is explored and proved not possible. Through mitigation efforts such as fencing of construction sites within the candidate Emerald sites and potential Natura 2000 sites, as well as adjusting the timing of works, walkovers prior to excavation works, relocation of encountered individuals, monitoring of roadkill and similar, the impact on the species is going to be minimized. However, as the habitat of the species is located directly on the footprint of the Project, its loss is unavoidable. The species are listed in the Annexes II and IV to the Habitats Directive warranting them important status on the EU level, and, despite local population conditions in B&H which do not require it, their habitats are critical habitats according to the EIB Standards. The residual impact on the habitats of these species is not major due to high habitat availability in the surroundings. Establishing functional offsets can take years, especially for habitats requiring ecological maturity (e.g., wetlands, forests). Waiting for them to be fully operational could delay projects indefinitely. The success of ecological offsets depends on various factors, such as weather, soil conditions, and species adaptation, which are often outside the developer's control. Requirement for offset implementation

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
scrubby habitat. The size of the proposed area is approx. 32.6 ha.'		prior to start of construction also may result in increased costs, lack of alignment between losses and compensation and lack of flexibility. Additionally, the requirement for offset being operational prior to start of construction is not a part of the EIB Standards/EBRD Policy. Minimum offset requirements were defined by the Biodiversity Management Plan, while detailed description of responsibilities and precise course of action is to be presented within the Biodiversity Offsetting Plan. Once the Main Design is finalized and Project timeline better defined, the Biodiversity Management Plan is to be updated with the Implementation Schedule.
Summary of needed compensation for residual impacts on PBF/CH 'Expert opinion is that its territory will not be directly impacted, however, approx. 10 ha of forest and potential habitat of woodpeckers will be removed in its general surroundings. It is important to ensure that the habitat of the white-backed woodpecker is not lost or degraded, even if the territory is not directly impacted. Due to this, no net loss must be assured. Woodpeckers are under the pressure from forest management that is not line with preservation of its habitat, especially extensive logging. Designating a core habitat for the woodpeckers, where logging is forbidden and the forest is managed to meet their conservation needs, is a good alternative strategy to achieve no	Unless the project promoter actually buys this forest land, they cannot ensure that such a measure is implemented. Therefore it is not clear who would have the obligation to do it and it will almost certainly not happen.	The concern regarding the implementation of measures on forest land without ownership by the Project promoter is valid. This issue can be addressed either through the purchase of the land or by signing a formal cooperation agreement with the Forest Management Company. However, JPAC does not have the internal capacity to manage such areas independently. Therefore, it is expected that this requirement will be managed externally through collaboration with the forest management authority, combined with regular monitoring by JPAC. The specific details of this arrangement will need to be defined within the Biodiversity Offsetting Plan.

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
net loss. This approach will help to maintain the existing habitat of the woodpeckers and prevent any further loss.'		
Annex E – Appropriate assessment		
Overall	See General Comments, above. The Appropriate Assessment needs significant improvements as it does not correspond to either the purpose or the content of an AA.	The Appropriate Assessment has been revised as requested, with additional Natura 2000 and Emerald sites assessed within a 15 km radius of the Project. This included a detailed analysis of the direct and indirect impacts on biodiversity features across all sites (Chapter 3.5.1, p. 50–108). Natura 2000 sites Velez and Bjelasnica–Igman–Visocica–Treskavica, as well as Emerald sites Idbar Canyon, Gornji tok Neretve, and Rakitnica River Canyon, were scoped out due to their distance from the Project site. Furthermore, the revised Appropriate Assessment provides a comprehensive overview of identified impacts on specific species and habitats (Chapter 5, p. 111–124). This includes species previously excluded, such as *Rupicapra rupicapra balcanica*, *Lutra lutra*, *Salmo marmoratus*, and *Salmo obtusirostris*, which, while not detected during field research done for ESIA, might occur in the area. Compliance with the Water Framework Directive is addressed on pages 115–117, along with an assessment of the impacts of watercourse regulation at the Konjicka Bijela site.
Overall	There is a clash between the waste disposal plans and the need to avoid damage to the	There will be no disposal of waste material within the Bijela canyon candidate Emerald site. Two disposal sites initially planned within the candidate Emerald site were removed from the design due to avoidable risks they may pose to the

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
	Bijela canyon Emerald site which is not explored either here or in the chapter on waste disposal.	ecological values of the area. As the route will have to be placed on embankments due to terrain configuration, the excavated material will be built in the embankment eliminating the need for disposal sites as well as avoidable borrow pits.
Stages of the AA Process	The four stages are outlined, yet the assessment itself only includes the screening and a very general appropriate assessment. Despite concluding that there will be direct unavoidable impact on the Konjicka Bijela and Prenj sites, which cannot be entirely mitigated, Stage 3 – Assessment of alternative solutions – and Stage 4 – Imperative reasons of overriding public interest (IROPI) – are not included.	The Appropriate Assessment is performed in two stages due to a lack of nationally regulated mechanism which would enable Stages 3 and 4. However, as the Appropriate Assessment was a part of the local EIA procedure which was accepted by the FMOET and EIA was issued therefore demonstrating the guiding principles of Stage 4. However, in order to confirm this, additional consultative meetings were held with FMOET in order to ensure they are fully familiar with the Appropriate Assessment contents. Upon discussion with the FMOET and incorporating their feedback, the FMOET was provided with two potential forms, one of which they were to fill out in order to formally provide FMOET's official opinion on potential impact through *Declaration by the authority responsible for monitoring sites of nature conservation importance*. As a result of the consultation process, FMOET opted for Form B, i.e. concluded that significant effects were expected for the Kanjon Bijele site, which was in line with the conclusions made in the Appropriate Assessment. Aforementioned stages are already demonstrated as there is a lack of alternatives to the alignment that are both ecologically and economically more adequate. Stages 3 and 4

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
		have been assessed under Chapter 6 and Chapter 7 of the Appropriate Assessment, respectively. The alignment was subject to rigorous technical, environmental, and social assessments through Multi-Criteria Analyses (MCA), Environmental Impact Assessments (EIA), public consultations, and parliamentary approvals. Several alternatives, including a "No Project" scenario, were evaluated. The chosen alignment was optimised based on stakeholder feedback and technical feasibility, balancing environmental and socio-economic priorities. Revisiting the route would contravene established legal and strategic policies, necessitating years of delays and additional costs. The Corridor Vc motorway is a critical part of the Trans-European Transport Network (TEN-T) and is deemed essential for Bosnia and Herzegovina's national socio-economic development. Public interest declarations were made in 2003 for the entire corridor and reaffirmed in 2016 for this subsection. The Project's strategic importance, alongside its contributions to regional connectivity, economic growth, and environmental improvements, justifies its development under IROPI provisions. To address residual adverse impacts, compensatory measures have been integrated into the project. These include habitat restoration, biodiversity conservation (e.g., bird panels, bat boxes), and hydrological interventions, as outlined in the Biodiversity Management Plan. These actions aim to offset ecological consequences, ensuring adherence to the mitigation hierarchy and international standards set by the European Bank for Reconstruction and Development (EBRD) and European

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
		Investment Bank (EIB). The Appropriate Assessment process thus accounts for both alternatives and IROPI, demonstrating a balance between development needs and environmental preservation.
Confirmed habitat types of EU importance	The map is not very intuitive as the legend colours do not seem to match the actual map.	Noted, this has been resolved through preparation of a new map, which clearly highlights all present habitats under chapter 2.3.3.3 (p. 27).
Table 7: Features of interest and Conservation objectives for potential Natura 2000 sites within the 500 m buffer zone. Conservation objectives 'This area is proposed as type C (type of site) - both SPA (Special Protection Areas) and SCI (Sites of Community Importance). Prenj-Cvrsnica-Cabulja is not legally adopted as a Natura 2000 site. No procedure for the adoption of proposed Natura 2000 sites has been carried out.'	The descriptions in the 'Conservation Objectives' column aren't phrased as objectives and don't seem to correspond to the description given in the methodology on p.12-13: *'› Establish the importance of the site in a wider EU context – list the justifications for the site's nomination as a potential Natura 2000/Emerald site and list the ecosystems and species important to this status. These ecosystems and species will be the Qualifying Interests.* *› In the absence of Conservation Objectives for the sites, the objectives for the key species and habitats in a wider EU context should be established - they will form equivalent Conservation Objectives and can then be the basis upon which to assess the significance of impacts the Project will have on them.* *› Determine whether the parts of the sites directly affected by the project support the 'Qualifying*	The Natura 2000 sites and Emerald sites in Bosnia and Herzegovina are not officially proclaimed, and there are no formal conservation objectives for these areas. The species and habitats mentioned represent a list of trigger features for the declaration of these sites, however no official basis for conservation objectives is given. In response to this, our focus was on maintaining the integrity of populations of trigger species and their habitats, which are important within the site's ecological framework. This way the assessment process remains aligned with the spirit of the Habitats and Birds Directives, acknowledging the limitations of current data. This was explained in detail under chapter 1.3.2 The Assessment Approach (p. 12).

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
	Interests' identified and how significant these areas are in the context of the site's interests. *› Determine whether the proposals will have any adverse effects on the integrity of the site.'* We expected something more corresponding to this presentation, focused on specific species/habitats, even if less detailed, but clearly including an objective such as 'restoring' or 'maintaining' the feature(s).	
The 2001 European Commission AA guidance outlines the following potential changes that may occur at a designated site, which may result in effects on the integrity and function of that site:	The 2018 guidance on Article 6 should be used.	Noted, this has been revised under chapter 4.1, p. 109.
Conclusion With application of all given measures, residual impacts will remain, especially in the Konjicka Bijela/Prenj sites. As compensational measures, afforestation and support to proclamation of a protected area are planned. As a part of offsetting measures, JPAC is to support the official designation of ecological network in FBiH.	Before thinking about compensation measures, Stages 3 and 4 need to be done, in order to ascertain whether the project can go ahead. In addition, supporting the official designation of the ecological network in FBiH cannot be an offsetting measure as it has to be done anyway – both under the Bern Convention and as part of the EU accession process: it is not additional.	Stages 3 and 4 have been outlined through Chapters 6 and 7 of the Appropriate Assessment. While these Chapters conclude that no alternatives are available and the project is declared of public interest, it remains critical to emphasize the distinction between mitigation/compensation and obligatory legal actions. Given the project's progression under IROPI provisions, the focus on robust implementation and monitoring of all compensatory measures becomes paramount. Measures like habitat restoration, afforestation, and biodiversity enhancement, as outlined in the BMP, are essential to minimize residual impacts. However, their success hinges on strict adherence, continuous evaluation, and transparent reporting to ensure ecological integrity and compliance with both national and international standards.

Specific comments: ESIA volume		
Text extract	**Comment/suggestion**	**Response by IPF8 Consultant ENOVA Sarajevo**
Annex F – Preliminary construction waste management plan		
Figure 9, Figure 10	These pictures are not visible, they should be split into at least two parts each (Figure 9 and Figure 10).	Figures 9 and 10 have been split for improved visibility and clarity.
Spoil Disposal Sites	See comments on section 3.2.11 in Chapters 1-5 of the main study.	The changes reflected in this document are consistent with those introduced in the ESIA.

Additional Meetings with NGOs

1. Meeting with Hunting Association "Koznik" Konjic

The meeting was held on December 6, 2024, in Konjic with the Hunting Association „Koznik". The Steering Committee president and the Consultant participated in the meeting, which focused on the impacts of the motorway construction on wildlife migration and hunting activities. Key discussion points included:

- **Wildlife Migration:** Concerns were raised about the motorway acting as a barrier for animal movement, especially in winter. The Hunting Association proposed installing cameras under viaducts during the operational phase to monitor impacts on migration routes.
- **Large Mammals Habitats:** Areas like Borasnica and Rakov Laz were identified as vital winter habitats for large mammals. The Association requested at least two wildlife crossings in the Mladeskovici area to maintain habitat connectivity.
- **Regulation Challenges:** The absence of a concession near Bijela and Prenj Mountain has hindered wildlife population assessments and hunting regulation.
- **Conservation Suggestions:** The inclusion of parts of the area in a future national park was proposed due to its biodiversity.
- **Data Gaps:** A lack of digital hunting ground maps and population data was noted.
- **Speleological Features:** Participants were unaware of any caves in the region due to its seismic nature.

Minutes of Meeting with Hunting Association are included in Appendix E.

2. Meeting with Forest Management Company "Sumarstvo Prenj"

The meeting was held on December 6, 2024, with representatives of the Forest Management Company "Sumarstvo Prenj" and the Consultant. Key points discussed during the meeting were as follows:

- **Biodiversity in Zlatar:** Highlighted as a botanical reserve with stenoendemic species, emphasising the need for biodiversity preservation.
- **Forest Road Intersections:** Two critical collision points identified (Zlatar Hill and Mladeskovici). Sumarstvo Prenj agreed to allow construction access with appropriate compensation.
- **Reforestation:** Fire-damaged sites, including Homolje, are suitable for reforestation, requiring 4,000-5,000 seedlings, which Sumarstvo Prenj can supply.
- **Forest Management:** No "old forest" are present in Bijela due to regular cutting. Illegal logging affects 30-40% of resources, with management based on expired plans and annual updates.
- **Wildlife:** Lynx and otters reported in the area, with evidence of lynx near Prenj Mountain and occasional otter sightings in Konjic.

Minutes of Meeting with Sumarstvo Prenj are included in Appendix E.

3. Meeting with Biospeleological Organisation "Biospeld"

The meetings with the Vice President of the Biospeleological Organisation "Biospeld" and the Consultant were held on December 5, 2024, and December 13, 2024. Both meetings were held online and provided updates on the speleological and biospeleological research related to the Project.

During the first meeting, main focus was given to the following topics:

- **Speleological Register:** The Speleological Association in Mostar maintains a cadastral register of speleological objects, including those on Prenj Mountain. Limited information is available, but several objects are known to exist, particularly on the Prenj plateau.
- **eDNA Analysis:** The analysis will focus on water sources with confirmed presence, targeting the species *Proteus anguinus* (olm). The importance of preventing contamination during sampling was emphasised, with recommendations to collect water samples after heavy rains to ensure proper underground flow.
- **Sampling Guidelines:** Fieldwork for speleological mapping should take place in early spring when the terrain is accessible, while water sampling should be conducted in summer after heavy rains for optimal results.
- **Analysis Facility:** Due to contamination concerns, the University of Sarajevo's Biology Department cannot perform eDNA analysis. Collaboration with specialised facilities or experts was suggested.
- **Research Collaboration:** It was proposed to engage speleologists and biospeleologists for a comprehensive study, including mapping and eDNA analysis. A proposal for speleological research and analysis will be prepared in collaboration with relevant experts.

The second meeting was organised as a follow-up discussion, covering the following points:

- **Known Objects:** Approximately 10 speleological objects are known to exist above the planned motorway route, with the expectation of additional discoveries during field surveys, based on information available to the Biospeld representative.
- **Surveying Process:** A walkover of the area above the Prenj tunnel could be conducted to identify additional objects. Since the motorway tunnel extends over 1 km underground in some sections, special attention would be given to objects that may intersect with the tunnel area.
- **Mapping Duration:** For any new objects discovered, a dedicated team of at least three members could map the features. Smaller objects typically require 1-2 days for mapping, while larger or more complex structures may take longer.
- **Biospeleological Studies:** Once mapping is completed, biospeleologists can collect fauna samples or conduct eDNA analysis if no macrofauna are observed within the objects.
- **Spring Investigation:** Springs originating from Prenj Mountain could also be explored for the presence of *Proteus anguinus*. This approach could involve speleo scuba divers conducting diving and water sampling activities, with plans for these to occur in winter when conditions allow.
- **Permits:** All activities, including mapping, sampling, and diving, would require the necessary permits from relevant authorities before proceeding.

Minutes of Meeting with Biospeld can be found in Appendix E.

4 Consultation Outcomes

The responses to the consultations mostly covered issues that have been raised by residents and concerned citizens groups as well as the experts engaged by the FMOET to review and approve the ESIA Study. The responses mainly refer to giving additional explanations and pointing out to the mitigation measures set out in the disclosed EIA Study and supporting documents. Where appropriate, the ESIA Study was amended and mitigation measures strengthened in response to the comments given.

The comments that could not be further discussed as they fall out of the scope of this Study were mainly related to the process of selection of the motorway alignment and the official adoption of the Studies on Water Protection Zones for all the springs affected by the Project (pertaining to Konjicka Bijela and unnamed local spring in Gornja Bijela), coupled with the formal adoption of the Decision on Protection.

Some issues which require further action are noted below.

Table 8: Issues requiring further action

Issue raised	Further action
Additional biodiversity surveys	The topic of eDNA was brought up during the initial public discussion during the local EIA procedure as well as during the stakeholder consultations. The eDNA analysis was outside of scope for the ESIA as that was not envisaged by the Biodiversity Scoping Report prepared and approved in 2020. Also, the local capacities for performing of his analysis not available, there are no known speleological objects in the vicinity of the tunnels (primarily the Tunnel Prenj) that would provide relevant information and the Prenj Mountain is outside of known distribution of the most important karstic underground element *Proteus anguinus* (olm). However, the information on methodology, timeframe and costs for the performing of eDNA analysis are being explored for the purpose of applying precautionary principle. Results of consultative meetings and inquiries, as well as proposed course of action were communicated to the EBRD and EIB representatives during early 2025. As a result, eDNA testing has been carried out in May 2025 and the results have been included in the relevant chapters and annexes.
Stakeholder consultations	The Appropriate Assessment was presented to the Federal Ministry of Environment and Tourism in January and July 2025 in order to ensure they, as a relevant authority for biodiversity protection issues, are fully familiar with its contents. The Ministry was also presented the *Declaration by the authority responsible for monitoring sites of nature conservation importance* and asked to provide feedback through the associated forms. Upon finalisation of Appropriate Assessment approval, which is expected in September 2025, update of the document in line with the Ministry's feedback was undertaken. Forestry Management Company was consulted during the stakeholder engagement activities. One of the purposes was to gather data on age of the forests as requested by

Issue raised	Further action
	Bankwatch. They, nor other stakeholders, do not have this information. However, they do have access to other data useful for strengthening the baseline. The representatives of the company expressed their readiness to share this data, but it has not been received to date.
Additional hydrogeology survey	The Main project development phase is underway for the Konjic (Ovcari) - Prenj Tunnel, Prenj Tunnel, and Prenj Tunnel - Mostar North subsections, which includes additional geotechnical, geological, and hydrogeological research as part of Mission G21. More comprehensive information about hydrogeology of the Project area will be available after the Main designs are completed.
Water well inventory	As foreseen in the ESMP, the detailed inventory of wells will be conducted closer to the start of construction to ensure up-to-date and accurate baseline data, as conditions in the project area may change over time (e.g., new wells, decommissioning, or shifts in groundwater usage). Conducting the inventory prematurely risks outdated or unreliable data, complicating monitoring efforts. Aligning the inventory with the construction timeline ensures Contractor accountability and ownership over both the baseline data and subsequent monitoring, fostering more effective management during construction. Additionally, the Land Acquisition and Resettlement Plans (LARPs), currently being prepared by the COWI-IPF8 consortium and expected to be finalised by September 2025, will include a socio-economic questionnaire to gather information about private wells. This information will be available to a Contractor to verify and amend before using in monitoring activities.
Official legal protection of water sources under the impact	The FMOET expert committee has requested that a Study on the sanitary protection zone be prepared for all recognised water springs, accompanied by the adoption of a protective decision. This request specifically pertains to Konjicka Bijela Spring and an unnamed spring in Gornja Bijela serving 30 households. The official legal protection of Konjicka Bijela is the responsibility of the City of Konjic and Water Utility Company Konjic, falling outside the scope of this Study and the jurisdiction of JPAC. As for the unnamed spring, lacking an official owner, protection activities can only proceed if the Water Utility Company Konjic assumes ownership and management. Despite this, the ESIA study has taken the utmost precaution in considering these two sources, assuming that the works will be conducted in the sanitary protection zone of high risk (I protection zone), and appropriate protection measures are prescribed accordingly. The future activities on official legal protection lies with the City of Konjic and Water Utility Company Konjic.
Land acquisition	The detailed budget and timeline for land acquisition will be an integral part of the LARPs. These plans will be developed once the exact land acquisition sizes or land use restrictions related to the Project are determined. After the Project documentation is prepared, Expropriation Studies will be produced, which will contain the precise scope of land

Issue raised	Further action
	acquisition and physical and/or economic relocation (land parcels and property to be acquired through expropriation).

Appendix A Minutes of the Meeting with NGOs in the EIA/ESIA development stage

Meeting with Aarhus centar, Sarajevo

Date: 3 October 2022
Time: 12:15h, duration: 1h
Place: Online, Microsoft Teams
Topic: Discussion on concerns raised by NGOs regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Bankwatch, Aarhus centar and Enova

The course of the conversation:
Participants introductions.
A brief presentation was given to the representatives of the Aarhus centar and Bankwatch, outlining the motorway route and the previous activities and research conducted for the purpose of preparing the E(S)IA Study.
Representatives of NGOs were invited to ask questions and express their concerns regarding the construction of the motorway, which included:

- Adequate consideration of Emerald areas in the Appropriate Assessment for the ecological network, the percentage of the affected area - The Study will include an assessment that considers Emerald and potential Natura 2000 areas; they emphasised that they have had negative experiences on other motorway sections south of this one regarding the level of research detail and impact assessment on natural areas.
- The primary focus is on the Emerald area of Konjicka Bijela, as well as old forests within the boundaries, and representative of the Bankwatch will attempt to gather more information and provide it.
- The thoroughness of biodiversity research, especially concerning the potential presence of endangered fish species - Meeting participants were informed about the conducted research, covered groups, and seasons.
- The issue of the lack of alternatives was highlighted as significant, especially for the Aarhus centar as they are primarily legal professionals - Participants were informed that the Study's author does not have the authority to select an alternative but may suggest minor modifications to the project in line with on-site conditions.
- Hydrogeology - Given that the interpretation of findings has not been finalised, it was not possible to thoroughly examine this crucial aspect. However, the Consultant emphasised willingness for further communication on this matter if the need arises.
- Underground caves and fauna – Representatives of the Bankwatch emphasised that this is a significant concern and cited an example from Croatia where the discovery of caves and underground fauna halted motorway construction for an extended period, although they could not recall the specific segment name. However, later research indicates it is likely the cave discovered during excavation for the "Vrata" tunnel on the Zagreb-Rijeka motorway.

- As one of the potential methods for detecting potential organisms within the depths of the Prenj mountain, Bankwatch inquired if the Consultant has utilised, and if not, suggested the use of the eDNA method.
- Social issues discussed included estimating the approximate number of people directly or indirectly affected by the Project, the methodology for conducting social research, the land acquisition process, compensation for affected businesses and citizens, as well as public involvement.
- It was emphasised that the Consultant remains available should any additional concerns or questions arise.

Meeting with the Association "Dinarica", a member of the WWF Adria network

Date: 7 October 2022
Time: 12:00h, duration: 1h 30min
Place: Online, Microsoft Teams
Topic: Discussion on concerns raised by NGOs regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Association "Dinarica" and Enova

The course of the conversation:
Participants introductions.
A brief presentation was given to the representatives of the Aarhus centar and Bankwatch, outlining the motorway route and the previous activities and research conducted for the purpose of preparing the E(S)IA Study.
The representative of the Association "Dinarica" was invited to ask questions and express concerns regarding the motorway construction, with the following topics of interest listed below:

- Watercourses: The Association "Dinarica" places a significant emphasis on the protection and preservation of natural watercourses in their activities. The representative of this association expressed a desire for the watercourses in the area of the planned motorway to be protected to the greatest extent possible, with viaduct pillars not being located directly in the rivers or on riverbanks.
- Hydrogeology: The representative is particularly interested in the hydrogeology of the sub-basins of the Neretva River. He emphasised that the hydrogeology of Prenj mountain is insufficiently researched and that the Consultant preparing the Study unfortunately does not have the capability to apply appropriate comparative methods, comparing current research results with previous studies. Such an approach would contribute to a better understanding of the hydrogeology of Prenj mountain as a separate discipline, as well as an understanding of hydrogeology in the context of climate change, the potential for droughts or floods in the Project area in the future, and other changes resulting from the influence of climate change, which would provide valuable data. Regardless of the situation, the representative welcomes the construction of the tunnel through Prenj mountain, along with measures to mitigate the environmental impact of the motorway and considers it a positive development.
- Biodiversity: The representative of the Association "Dinarica" was interested in the potential discovery of new (rare) plant and animal species in the Project area and the further procedure if such a situation arises once construction work commences. Representatives from Enova presented research related to biodiversity conducted in the preparation of the Study and emphasised the importance of impact mitigation measures, which the Study will prescribe to protect and preserve the biodiversity of the Project area.
- Microclimate Change: The representative of the Association was interested in potential microclimate changes in the Project area. He cited the example of Zadar, where after the construction of the Sveti Rok Tunnel, fog appeared, which had not been present in such quantities before. He inquired whether similar assessments have been made for the Konjic (Ovcari) - Prenj Tunnel - Mostar North motorway section.

Representatives from Enova presented research related to the movement of air fluids, which are included in the Study, and mentioned that the results of this research were not yet finalised at the time of the meeting but will soon be made available to the public.

- Public Participation and Study Review Methods: The representative of the Association "Dinarica" inquired about the timeline for when the Study might be made available for interested parties in the Project, as well as the procedures for organising public consultations and the document's review. Representatives from Enova provided answers to the question and explained that the review by the Federal Ministry of Environment and Tourism and the organisation of public consultations will be in accordance with the current legislation governing this area.
- Continuity of Project Area Research: The question of the continuity of research in the Project area after the start of construction work, especially in the field of hydrology and hydrogeology, is a particularly important issue for the representative of the Association "Dinarica". He emphasised the importance of the role of the Adriatic Sea Watershed Agency, which is responsible for granting water consents and permits.
- The representative of the Association "Dinarica" is aware of the research on social impacts conducted in the preparation process of the E(S)IA Study. The representative welcomed the thoroughness of the research and stated that he would analyse the social impacts when the Study becomes available to the public.
- Representatives of Enova remain available for any additional inquiries from the representatives of the "Dinarica".

Meeting with the Zeleni Neretva, Konjic

Date: 6 October 2022
Time: 10:00h, duration: 45min
Place: Online, Microsoft Teams
Topic: Discussion on concerns raised by NGOs regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Zeleni Neretva and Enova

The course of the conversation:
Participants introductions.
The representative of Zeleni Neretva was briefly presented with the motorway route and the activities and research conducted so far for the preparation of the E(S)IA Study. The representative is well acquainted with the Project, particularly with the Konjic (Ovcari) - Prenj Tunnel subsection.
Representatives of Zeleni Neretva was invited to ask questions and express his concerns regarding the construction of the motorway, which included:

- Protected areas, including Zlatar – designated as a protected area in 1956, which the representative claims have preserved its values and is likely to retain protection through the revision process.
- Waste management measures – as the excavated material from Zlatar will need to be transported through the City of Konjic, posing a problem for the entire city and its residents, including the emission of pollutants, especially dust particles. It is essential to include measures to address this impact.
- Inert material landfills – the representative believes that it is possible for the local population to protest against the landfill in Ovcari, citing a similar situation that occurred due to the old city landfill in Ovcari. In the past, residents' protests prevented its reopening (it is somewhat unclear whether it was supposed to be reopened or if they insisted on its closure).
- The representative believes that the proposed landfills may not be able to accommodate all the material. He is concerned about what will happen to the material from the Prenj Tunnel.
- The representative believes that using Rakov Laz as a disposal site for excavated material from the Prenj Tunnel should not be an option due to its landscape and biodiversity value, since it was considered an option in the past.
- Additionally, the representative mentions the rest area in Rakov Laz and the associated facilities (gas station, restaurants, truck parking, etc.), which is also no longer part of the current project proposal.
- He emphasised that Rakov Laz is shaded, covered with snow and ice for 4-5 months of the year and raised questions about how maintenance is planned during these periods.
- They inquire about the ventilation of the Prenj Tunnel and whether pipes will need to be extended to the mountain plateau. Due to the absence of a Preliminary/Main design, it was not possible to provide an answer, but the best engineering solutions will be utilised.
- He raised the issue of potential burial of intermittent streams, but it was emphasised that the designers have already taken these watercourses into account and have prevented such a problem through hydraulic engineering structures.

- Hydrogeology was emphasised as a highly important topic, but the representative of Zeleni Neretva is also aware that it is impossible to predict with certainty what may be found, and there is a significant risk of encountering caves and other rock formations that could impact water resources.
- It was highlighted that the Consultant remains available should any additional concerns or questions arise.

Appendix B Public Hearing Announcement

Bosna i Hercegovina
Federacija Bosne i Hercegovine
FEDERALNO MINISTARSTVO OKOLIŠA I TURIZMA

Bosnia and Herzegovina
Federation of Bosnia and Herzegovina
FEDERAL MINISTRY OF ENVIRONMENT AND TOURISM

Bosna i Hercegovina
Federacija Bosne i Hercegovine
FEDERALNO MINISTARSTVO POLJOPRIVREDE VODOPRIVREDE I ŠUMARSTVA
SARAJEVO, ul. Hamdije Čemerlića 2
Primljeno: 25-04-2023
Org. jedin. | Broj | Prilog | Vrijednost

Broj: UPI 05/1-19-4-91/23
Sarajevo, 24. 04. 2023. godine

JP Autoceste Federacije BiH d.o.o., Mostar
Adema Buća 20
88000 Mostar

JP Autoceste Federacije BiH d.o.o., Mostar
- Operativni ured u Sarajevu
Hamdije Kreševljakovića 19
71000 Sarajevo

Grad KONJIC
Maršala Tita br. 62
88400 Konjic
- **Služba za prostorno uređenje, građenje i obnovu (zaštita okoliša)**
- **Služba za zajedničke i stručne poslove (obavijestiti Mjesne zajednice I NVO)**

GRAD MOSTAR
Braće Fejića 51
88 000 Mostar
- **Služba za komunalne poslove i okoliš (zaštita okoliša)**
- **Služba za opću upravu i gradska područja (obavijestiti Mjesne Zajednice i NVO)**

Ministarstvo trgovine, turizma i zaštite okoliša HNK/Ž
Braće Fejića bb
88000 Mostar

Agencija za vodno područje rijeke Save
Ul. Grbavička 4/III
71 000 SARAJEVO

Federalno ministarstvo prostornog uređenja
Hamdije Čemerlića 2
71 000 Sarajevo
25-04-2023

Federalno ministarstvo poljoprivrede, vodoprivrede i šumarstva
Hamdije Čemerlića 2
71 000 Sarajevo

Udruženje Zeleni Neretva
Varda 1
88400 Konjic

Aarhus Centar Sarajevo
Behdžeta Mutevelića 39
71000 Sarajevo
25-04-2023

Predmet: Javna rasprava u postupku ocjene Studije o utjecaju na okoliš za investitora Javno preduzeće Autoceste Federacije Bosne i Hercegovine d.o.o. Mostar, za projekat **izgradnje poddionice na koridoru Vc Konjic(Ovčari) - tunel Prenj – Mostar sjever**

Poštovani,

Federalnom ministarstvu okoliša i turizma je dana 11.04.2022. godine nosilac projekta /investitor **Javno preduzeće Autoceste Federacije Bosne i Hercegovine d.o.o. Mostar,** dostavio Studiju uticaja na okoliš za projekat **izgradnje poddionice na koridoru Vc Konjic (Ovčari) - tunel Prenj – Mostar sjever**. Studiju uticaja na okoliš je izradio ovlašteni konsultant Enova d.o.o., Sarajevo.

Ul. Hamdije Čemerlića br.2, 71 000 Sarajevo, telefon 00 387 33 726 700, telefax 00 387 33 726 747,
e-mail: fmoits@bih.net.ba, www.fmoit.gov.ba

Studija je izrađena na osnovu Rješenja donesenog u upravnom postupku prethodne procjene uticaja na okoliš (PPUO) broj UP-I 05/2-02-19-5-27/22 SN od 12.04.2022. godine, kojim je utvrđena obaveza izrade Studije, njen obim i sadržaj.

U skladu sa čl. 76. Zakona o zaštiti okoliša ("Službene novine Federacije BiH", br. 15/21) Federalno ministarstvo okoliša i turizma obavještava vas i poziva kao zainteresovane subjekte na javnu raspravu koje će se održati u :

1. Mostaru dana 10.05.2023. godine (srijeda) u prostorijama Grada Mostara – sala gradskog vijeća, koja se nalazi na adresi Hrvatskih branitelja br.2, sa početkom u 11.00 sati

2. Konjicu dana 11.05.2023. godine (četvrtak) u prostorijama Grada Konjica – u sali Gradskog vijeća, koja se nalazi na adresi, Maršala Tita br. 62, sa početkom u 11.00 sati

Dnevni red:

1. Prezentacija zakonskog osnova u postupku odobrenja Studije uticaja na okoliš (predstavnik Federalnog ministarstva okoliša i turizma).
2. Prezentacija Studije o procjeni utjecaja na okoliš (predstavnik konsultanata – Enova d.o.o., Sarajevo).
3. Pitanja, diskusija, odgovori i objašnjenja.

Dokumentacija je dostupna na uvid u prostorijama Federalnog ministarstva okoliša i turizma - Sektor za okolišne dozvole, ul. Hamdije Čemerlića br. 2 Sarajevo, a Studija uticaja na okoliš je dostupna i na web stranici Ministarstva od 24. 04. 2023. godine, link: https://fmoit.gov.ba/bs/okolisne-dozvole/javne-rasprave-i-javni-uvidi/obavijest-o-odrzavanju-javne-rasprave-za-projekat-izgradnje-poddionice-na-koridoru-vc-konjic-ovcari-tunel-prenj-mostar-sjever-investitora-javno-preduzece-autoceste-federacije-bosne-i-hercegovine-d-o-o-most

Molimo Grad Konjic - Službu za zajedničke i stručne poslove, te Grad Mostar - Službu za opću upravu i gradska područja da, u skladu sa svojim nadležnostima, o navedenim aktivnostima obavijesti mjesne zajednice koje gravitiraju predmetnom području na kojem se planira realizacija projekta radi informiranja i uključivanja stanovnika sa područja grada Konjica i Mostara, kao i sve ostale zainteresirane subjekte, nevladine organizacije (NVO) koje se bave pitanjem zaštite okoliša i cjelokupne javnosti u postupak donošenje odluka.

Primjedbe na Studiju mogu se dostaviti u pisanoj formi u roku od 30 dana od dana prijema ovog akta, odnosno 15 dana nakon održane javne rasprave na adresu Federalnog ministarstva okoliša i turizma. Neblagovremeno pristigle primjedbe, mišljenja i prijedlozi neće se razmatrati.

S poštovanjem,

[redacted]

Bosna i Hercegovina FEDERACIJA FEDERALNO MINISTARSTVO

Dostaviti:
-naslovu
-arhivi

[redacted]

Akt pripremila:
Akt kontrolisao

Ul. Hamdije Čemerlića br.2, 71 000 Sarajevo, telefon 00 387 33 726 700, telefax 00 387 33 726 747,
e-mail: fmoits@bih.net.ba, www.fmoit.gov.ba

Utjecaj na okoliš

Autoceste pozivaju stanovnike Konjica i Mostara na javnu raspravu

Javna rasprava održat će se u vezi projekta Izgradnje poddionice na koridoru Vc Konjic (Ovčari) - tunel Prenj - Mostar sjever.

Gospodarstvo / Ulaganja | 09. 05. 2023. u 12:59 Bljesak.info

Federalno ministarstvo okoliša i turizma Sarajevo, u skladu s člankom 40.stav (5) Zakona o zaštiti okoliša (Službene novine Federacije BiH, broj: 15/21), poziva stanovnike grada Konjica, grada Mostara kao i sve zainteresirane subjekte i nevladine organizacije da sudjeluju u javnoj raspravi u postupku ocjene Studije o utjecaju na okoliš za investitora Javno poduzeće Autoceste Federacije Bosne i Hercegovine d.o.o. Mostar, za projekat Izgradnje poddionice na koridoru Vc Konjic (Ovčari) - tunel Prenj - Mostar sjever

Prva javna rasprava održat će se u prostorijama Grada Mostara - sala gradskog vijeća, dana 10.05.2023. s početkom u 11 sati

Druga javna rasprava održat će se u prostorijama Grada Konjica - općinska sala, dana 11.05.2023. s početkom u 11 sati.

Dnevni red:

Prezentacija zakonskog osnova u postupku ocjene SUO (predstavnik Federalnog

ministarstva okoliša i turizma)

Prezentacija studije o utjecaju na okoliš (izrađivač SUO)

Pitanja, diskusije, odgovori i objašnjenja

Dokumentacija za predmetnu Studiju utjecaja na okoliš dostupna je na uvid u prostorijama Federalnog ministarstva okoliša i turizma - ulica Hamdije Čemerlića br 2, 71 000 Sarajevo, kao i na web stranici ministarstva www.fmoit.gov.ba - Okolišne dozvole/javni uvid i javne rasprave.

Appendix C Minutes of the Public Hearing in Mostar

Note: for the purpose of protecting personal data, the translated Minutes do not contain names of the parties discussing.

Date: Wednesday, 10 May 2023
Location: City Hall Mostar
Time: 11:00h

Agenda:
Presentation of the legal basis in the Environmental Impact Assessment process (representative of the Federal Ministry of Environment and Tourism),
Presentation of the EIA Study (Consultant representative),
Discussion, questions, answers.

At the beginning of the Public Hearing, the Deputy Minister in the Department of Environmental Permits, Environmental Impact Assessment, and Pollution Registers, welcomed all those present, or those interested in the Project for the construction of the subsection on the Corridor Vc, Konjic (Ovcari) - Prenj Tunnel - North Mostar. He then requested that, during the discussion, the focus be on the presentation of the EIA Study for the Project, rather than on the route, as the Federal Ministry of Environment and Tourism has no authority over the route and exclusively deals with the assessment of its environmental impact.

1 Presentation of the legal framework in the Environmental Impact Assessment process

A representative of the Federal Ministry of Environment and Tourism, the Process Leader, greeted the attendees at the beginning, thanked them for attending this public discussion, and presented the legal basis for the Environmental Impact Assessment process. It was also mentioned that a Epert Committee has been formed, which will provide its expert opinions on the assessment of the EIA Study within the legal timeframe. She informed the attendees that there is a 15-day period from the date of this Public Hearing to submit opinions and suggestions in writing to the Federal Ministry of Environment and Tourism.

Presentation of the EIA Study

Representative of the Consultant ENOVA, Sarajevo, presented the EIA Study in detail in the process of assessing the EIA Study for the Investor, JPAC, Mostar, for the Project of construction the subsection on the Corridor Vc, Konjic (Ovcari) - Prenj Tunnel - North Mostar.

Discussion, Questions, Answers

Representative of the Association “Jer nas se tice” - You mentioned that an expert conducted an analysis of groundwater based on some previous indicators in this area. I'm interested in whether the indicator used is sufficient. In other

words, has there been additional geological testing of groundwater in the last 5 years since this began? Will this route impact the groundwater in this section, and what will that impact be?

Representative of the Consultant - The conclusion is stated in the EIA, and everything is explained in detail. There will be no disturbance of the water sources used for water supply, given that the tunnel is located below the impermeable layer in the Prenj Mountain. It can only lead to the turbidity of these water sources during the construction phase, especially during heavy rainfall or rapid snowmelt from the Prenj Mountain. As for physical-chemical contamination or any other type of groundwater contamination, especially the Bosnjaci springs, based on the existing data we have, there should be no disruption of the water sources.

Representative of the Association "Eko-Dvogled" - I read in the EIA on page 435 that the tunnel is the most sensitive location on the motorway route in terms of protecting groundwater due to its proximity to the Bosnjaci springs. People are very concerned because Bosnjaci spring directly supplies the eastern side of Mostar. In conclusion, the motorway route passes through the Bosnjaci spring catchment area, and its construction and use may have an impact on this karst spring. Appropriate mitigation measures are needed.

Representative of the Consultant - There will be an impact because they are fed from Prenj, but it is considered that the impacts will not be of high intensity and that they will not be so significant because only the impacts causing turbidity of the springs are considered, and they will not lead to the interruption of the water supply. There will be no physical-chemical contamination because accidents in these areas are not considered.

Representative of the Association "Eko-Dvogled" - An alternative water supply for people must be ensured because there is a possibility that water supply may be interrupted during the operation.

Representative of the Consultant - Therefore, Water Utility Company from Mostar will be responsible along with the construction works.

Representative of the Association "Eko-Dvogled" - We are interested in the construction of motorway, the sooner, the better, but it is essential that they are done in the right way with as little impact as possible. Our comments are not against the motorway, especially not against the authors of the EIA.

You haven't explained the Prenj Tunnel sufficiently, which is the main route. I saw that it has 10 emergency accesses. However, I think it should be included in the Study, considering the road from Sarajevo to Mostar is huge, with very challenging traffic conditions, especially the Prenj Tunnel, where the human component in driving is essential, and in Konjic, there is one hospital where people are on strike, and no one is taking care of that hospital. That hospital is essential, and it must be included in the EIA.

The Process Leader requested that they submit their inquiries in writing, and a written response will be provided.

Representative of the Association "Eko-Dvogled" - I would like it to be recorded that we have requested additional research related to the Bosnjaci water source, not just regarding quality but quantity as well. Mostar has problems with water supply every summer, and we are extremely concerned about what will happen if underground water from Prenj is disrupted, which supplies the Bosnjaci water source.

Representative of the Aarhus centar BiH - I'm interested in why there hasn't been research on the underground fauna.

Representative of the Consultant - Research on underground fauna was considered through water sampling, but, at that time, it wasn't technically feasible due to the limited capacity of local institutions to conduct such research. We had unofficial informative contact with the Institute for Genetic Engineering and Biotechnology regarding their potential involvement in future research as they have the expert capacities. However, there is a measure stipulating that in case of the opening of new caverns within the Prenj Tunnel and other tunnels, a biospeleologist will be engaged during excavation to assess the impact and potentially conduct research regarding the existing underground fauna because we can assume that such organisms are very rare.

Local resident 1 - Regarding the Bosnjaci water source, it's not only about the water inflow into Bosnjaci, but whether any holes or something will appear due to the construction, where Bosnjaci water might be lost? Another question, from these images, we see that you are diverting rainwater from Rujiste, creating an embankment that will appear above the village of Humi. Will a sinkhole develop over time when there is a significant influx of water?

Project Designer - This watercourse, according to our knowledge, stops in a water-filled depression and continues further from that point. In that section, there will not be exactly that shape of a landfill; a cut will be made to capture this watercourse in that section, and it certainly intersects the main motorway route. We have to provide passage for it to the other side of the motorway. This passage is large, of significant dimensions, and it is designed based on the water coming from above, and it is now part of the watercourse passage through the motorway. A sedimentation basin is planned here because there is a significant amount of sediment deposition. After this sedimentation basin, the passage continues to exit on the other side of the motorway, and then it continues its natural watercourse. For hydrology-related questions, please send them in writing so that colleagues who worked on that part can provide answers.

Local resident 2 - I am a resident of the neighbourhoods closest to this route. I must talk about the route that is just above our houses, a 4 km stretch, as we have never had the opportunity to discuss this with anyone. There is an alternative route that makes this entire route 3 km shorter than the current one. The current one is the worst option for the 1,500 residents living here. We are

not against the motorway, but we are against this route, and we will fight against it.

Project Designer - Motorways, like all other roads, have certain regulations that must be followed. Moreover, because of the speeds on motorway and the safety that prevails, they have the strictest regulations. These include maximum gradients, which should not exceed 4-4.5% for a speed of 120 km/h. There is a defined minimum radius for horizontal and vertical curves that must be adhered to. Sometimes it is necessary to perform geometric development of the route, making it longer, even though it doesn't make sense, to achieve those gradients that won't exceed 4-4.5%. On the other hand, there is the Spatial Plan of the Federation of BiH. This route is within the corridor of that Spatial Plan, which is not too narrow; it has its width. But the issue here is descending from the elevation of the Prenj Tunnel exit to reach the valley and connect to the Mostar-North interchange. It is very easy to answer your question regarding those 3 km - that is the reason to artificially extend the route to obtain gradients within the legal framework. We cannot construct something for a speed of 120 km/h when we have gradients and curve radii that are greater. Also, the route is defined by the Spatial Plan. If your point falls outside the framework of the Spatial Plan, we cannot work there, and we must not deviate from the Spatial Plan. So, this route's location was conditioned by two things: the Spatial Plan and the minimum elements, i.e., legal elements that we must adhere to.

Representative of the Association "Jer nas se tice" - He requested that it be entered into the record that, since they agree on one thing, which is the critical point of Bosnjaci, and they can see what is written in the EIA, that this route will have a negative impact on the water source. He suggests that the investor reconsider the possibility or alternatives. If an environmental permit is issued, and the situation remains the same in the EIA, then they will be in a legal dispute. To avoid this, they kindly request the investor to reconsider everything mentioned in the EIA regarding Bosnjaci.

Local resident 3 - Is the planned material delivery on this section in Lisani, as it is planned, to be transported via local roads through the settlement?

Representative of the Consultant - Local roads through the settlement will be used because the Prenj Tunnel will be constructed first, followed by the route.

Representative of the Federal Ministry of Spatial Planning - He gave a suggestion regarding the Bosnjaci water source. He mentions that when the tracer was released, and he doesn't know the exact locations, but logic says that tracers should be released where the route is. This means not from Prenj's top but from the route itself. This can prove whether it intersects with the Bosnjaci water source, and it's straightforward. He further noted that he has been involved in this issue since 2008 when research was conducted above Blagaj, including the release of tracers. In this regard, he points out that discussions regarding the route and some things confuse him because public discussions were held at that time. A group of experts surveyed the route from Bosnjaci to Pocitelj. Nine NGOs participated at the time and rejected the previous route, trying to convince the

experts that the motorway will have less impact on the Bosnjaci water source if it passes above Bosnjaci rather than below.

Project Designer - Something no one has mentioned is zoning. You have zones based on the distance from the water source. Zone I is right at the water source, Zone II is an area where construction is prohibited by law, and Zone III is an area where construction is allowed. The motorway falls into Zone III, and that means it will have an impact, but it won't have a significant impact that would prevent construction.

Representative of the Consultant - There is an obligation for a hydrogeologist to be present at high-risk locations during the construction phase, primarily at the Orlov kuk tunnel and the Prenj tunnel. In case anything happens in the field during the construction phase of these two tunnels, the hydrogeologist will be on-site to predict measures that are appropriate at that moment.

Representative of the Investor - It's essential to know that with the completion of this public discussion today, it doesn't mean you are left alone. We from the JPAC will continue to cooperate with you, the local population, and interested parties in the future. When the construction contractor is selected, a supervisory body will also be chosen, including technical assistance with experts in environmental protection and experts in social issues. We want to have good communication with the local population.

Representative of the Association “Jer nas se tice” - I'm interested in information on how much material is planned to be stored in Lisani.

Representative of the Consultant - The quantities are provided in the EIA.

Representative of the Association “Jer nas se tice” - I agree that understanding is needed from both sides, but also from the investor towards them, as this is one of the main tourist destinations in the City of Mostar. It's better to hold meetings first with the residents of Podgorani, Prigradjani, Humi, to avoid the need for blockades later when the process is already underway. Convince them that this will not have a negative impact on them.

They are coming to the area of the Uborak landfill; there are wind roses that lift bags there and scatter them everywhere. There is an impact from birds, which will be critical for the motorway.

Deputy Minister - There had to be a review of birds, i.e., biodiversity, in the EIA; if there was research, then the bird segment was covered.

Process Leader - Thank you all for participating in this Public Hearing, and I would like to note that you have 15 days to submit comments and suggestions to the address of the FMOET, which will be further forwarded to the Investor for their response.

Appendix D Minutes of the Public Hearing in Konjic

Note: for the purpose of protecting personal data, the translated Minutes do not contain names of the parties discussing.

Date: Wednesday, 11 May 2023
Location: City Hall Konjic
Time: 11:00h

Agenda:

1 Presentation of the legal basis in the Environmental Impact Assessment process (representative of the Federal Ministry of Environment and Tourism),

Presentation of the EIA Study (Consultant representative),
Discussion, questions, answers.

At the beginning of the Public Hearing, the Deputy Minister in the Department of Environmental Permits, Environmental Impact Assessment, and Pollution Registers, welcomed all those present, or those interested in the Project for the construction of the subsection on the Corridor Vc, Konjic (Ovcari) - Prenj Tunnel - North Mostar. He then requested that, during the discussion, the focus be on the presentation of the EIA Study for the Project, rather than on the route, as the Federal Ministry of Environment and Tourism has no authority over the route and exclusively deals with the assessment of its environmental impact.

1 Presentation of the legal framework in the Environmental Impact Assessment process

A representative of the Federal Ministry of Environment and Tourism, the Process Leader, greeted the attendees at the beginning, thanked them for attending this public discussion, and presented the legal basis for the Environmental Impact Assessment process. It was also mentioned that a Epert Committee has been formed, which will provide its expert opinions on the assessment of the EIA Study within the legal timeframe. She informed the attendees that there is a 15-day period from the date of this Public Hearing to submit opinions and suggestions in writing to the Federal Ministry of Environment and Tourism.

Presentation of the EIA Study

Representative of the Consultant ENOVA, Sarajevo, presented the EIA Study in detail in the process of assessing the EIA Study for the Investor, JPAC, Mostar, for the Project of construction the subsection on the Corridor Vc, Konjic (Ovcari) - Prenj Tunnel - North Mostar.

Discussion, Questions, Answers

Representative of the Association Zeleni Neretva, Konjic - The first issue is the surplus excavation material. When considering everything, we are talking about a total of approx. 5 million m^3, of which only the material from the Prenj Tunnel will remain unused, which won't be utilised for the motorway, embankments, and the like. That leaves us with 2.8 million m^3. It has been determined that a portion will be used at the Humilisani site on the southern side, while nothing has been specified for the northern side, except that the excess excavation material from the Konjic Bypass will be placed in the municipal landfill in Konjic. I'd like to remind you that this is 280,000 m^3, and our landfill cannot accommodate even a fraction of that material.

The second issue is what will happen with the 1.4 million m^3 that remains on the northern side because the EIA Study does not clearly define where this waste will go, i.e., what remains after utilising all that could be used.

Furthermore, for the protected area of Vrtaljica, the Law on Nature Protection stipulates that every former protected area from the SR BiH has the status of protected until its final status is determined. Additionally, the Emerald areas, Zlatar, and the entire Bijela River valley have candidate status, but you mentioned that they are not officially protected areas. However, you know that Natura 2000 for EU countries is similar to what Emerald areas are for countries in the EU accession process.

Regarding hydrogeology, if, during the tunnel construction, a problem arises related to water or porous soil, what is the alternative? Do the construction works stop, or what is the procedure? Are there wildlife crossings planned?

Representative of the Consultant - Concerning the disposal of excavation material resulting from the excavation of the Prenj Tunnel, a portion of the material from the Prenj Tunnel, about 1.4 million m^3, will be used to create tall embankments before the entrance to the Prenj Tunnel on which the motorway will be laid. The remaining excavation material from the Prenj Tunnel will be used for landscaping around stations approx. 7, 8, 9, to 10 km. Therefore, all the material excavated from the Prenj Tunnel will be utilised in the areas where tall embankments will be constructed. The embankments in that area are up to 30 m high.

Project Designer - The total excavation from half of the Prenj Tunnel is 1.4 million m^3, so this is not excess; it is all the material that will be excavated from half of the tunnel. All this material will be used for the embankments of this section because it is foreseen that all the material is of good quality and can be used for this purpose.

Representative of the Consultant - Regarding the hydrogeology of Prenj, dye tracing tests were conducted. Dye was injected at locations on Prenj that are above the motorway route. This was done to determine whether the water sources around Prenj are fed by water from Prenj.

Representative of the Consultant - Regarding the protected area, Vrtaljica is indeed a previously protected area, which remains protected until the revision

process, and we have considered it as such. As for Natura and Emerald, these are officially potential Natura 2000 areas and candidate Emerald areas, not accepted Emerald areas. However, due to the EU Habitats Directive, to which we aspire to align, we have considered them as already declared Emerald and Natura 2000 areas. In line with that, we have, in accordance with the EU Habitats Directive, assessed the acceptability of the ecological network request as a separate document that considers the impacts solely and exclusively on these Natura 2000 and Emerald areas.

Local resident 1 - I am thrilled with this presentation, and this is a commendable Project that will bring benefits to this area, especially to the Konjic locality, and I wholeheartedly support it. Since Corridor Vc adjoins and encompasses the Prenj Mountain, which will probably one day become a national park, are these considerations being taken into account? Do beekeepers and fishermen need to take preventive measures during these works?

Representative of the Consultant - The potential National Park Prenj was considered within the context of potential Natura 2000 areas since these areas are defined by the Spatial Plan of the Federation of BiH. The impacts were assessed within this environmental impact assessment in relation to the entire motorway as well as directly for those areas that are protected or intended to be protected. It was challenging to assess the impact on this potential future national park because it does not exist, which is a significant obstacle. Another significant obstacle is the absence of a management plan. Regarding fish, they were investigated by the university professor, not only at locations in Konjic but also upstream and downstream because of potential negative impacts that could occur. However, technical solutions are provided, and measures have been implemented to prevent any negative consequences.

Representative of the Federal Ministry of Spatial Planning - In the interest of the Federal Ministry of Spatial Planning, I must ask if we have an excerpt from the Spatial Plan. From what I have seen, we do not have it, and everything I have seen in the conceptual solutions does not comply with the Spatial Plan. Second, the Natura areas are not very specifically specified. Which areas are these?

Representative of the Federal Ministry of Environment and Tourism - Natura 2000 areas must be supported by scientific research by institutions authorised for such purposes, usually institutes and universities. Natura 2000 sites are declared by regulation or other legal basis, but only when a country joins the EU. We need to have preliminary maps, or places that enter Natura sites. It is only when the candidate joins the EU as a member that Natura 2000 is declared.

Representative of the Consultant - Due to all of this, we refer to them as potential Natura areas, something that will become a Natura area in the future. Now, primarily because of the requirements of banks willing to finance this Project, we have considered them as Natura 2000 areas as a precaution and for assessing potential impacts and measures. However, they do not have a specific legal basis, in the sense that there is no legislative document stating that Prenj is a potential Natura 2000 area and is protected. However, as a precaution, we have treated it as a Natura 2000 area.

Representative of the Aarhus centar BiH - Can you please respond to recent question regarding animal passages?

Representative of the Consultant - Regarding animal passages, consultations were held with experts who worked in the field, and we asked them if there is a need to create passages for each group. The mammal expert said there is no need for mammals, but the amphibian and reptile expert indicated a need. Therefore, passages for amphibians and reptiles and, of course, fish will be created at specific locations, both north and south of the Prenj tunnel, where crossings occur.

Representative of the Investor - The question that arose as a request from the Municipality of Konjic is about the Konjic South interchange. You have industry here, you have potential, and you wanted all this freight traffic that currently passes through the narrow city centre. You requested this interchange even though it was not part of the Spatial Plan for the Corridor Vc. We from JPAC are in daily communication with the Federal Ministry of Spatial Planning. We submitted a request to change the decision on implementing the Spatial Plan, allowing us to build these two structures as presented in the Project. We won't be able to carry out these two projects unless the Parliament adopts them. The route itself, the Project, is in line with the Spatial Plan, so we are prepared to build the route if there are no changes.

Local resident 2 - What about the Crna Vrela springs? What guarantees are there that we won't run out of water? How far is the route from the springs? What about the wastewater from the 11 km long tunnel; will it return to the Crna Vrela springs?

Representative of the Consultant - As for the impact assessment on the Crna Vrela springs, it has been assessed that there won't be any impact in the sense of cutting off the water supply; the worst that can happen is temporary cloudiness during heavy rain or snowmelt season.

Project Designer - The water source won't be interrupted, and all water sources near the route will be protected. All water from the motorway will go through 100% treatment to ensure the discharged water into the Suhi Potok and Bijela rivers is treated.

Local resident 3 - I would like to direct you to contact the representatives of hunting associations regarding these animal passages.

A group of residents asked questions related to their lands located on the route.

Representative of the Investor - Regarding your property located within the future expropriation zone, that property will be compensated in a proper manner. When the project is completed, an expropriation report will be prepared. In that report, it will be determined what falls within the expropriation zone. After that, the procedure will be conducted by the City of Konjic. The City of Konjic will appoint a commission to carry out the expropriation process. The commission will include experts in agriculture, construction, and other fields who

will assess the value of your land and other assets on the property. This is all done in the regular procedure conducted by the City of Konjic. Then, the value of the property will be determined, and if you are satisfied with the proposed compensation, an agreement will be reached.

It means there is a regular procedure led by the City of Konjic in which compensation will be provided for what is within the expropriation zone, what the future motorway encompasses.

Process Leader - Thank you to everyone for participating in this Public Hearing, and please note that you have a 15-day deadline to submit comments and suggestions to the address of the Federal Ministry of Environment and Tourism, which will then be forwarded to the Investor for a response.

Appendix E Minutes of Additional Meetings after Open House Days

Meeting with Hunting Association "Koznik" Konjic

Date: 6 December 2024
Time: 10:00h, duration: 1h
Place: Hunting Association office
Topic: Discussion on concerns raised by the Hunting Association regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Steering Committee President and other members and Enova

The course of the conversation:

- The meeting began with discussions on changes to migration routes – the paths wildlife takes when moving between hunting grounds. This topic is particularly important in winter when animals migrate to lower-altitude areas.
- During winter, wildlife tends to move towards streams, meaning populations exist on both sides of the future motorway. Wildlife follows natural resources, but construction of the motorway creates an artificial barrier and increases predatory pressure. This barrier obstructs migration, leading to significant negative impacts on wildlife.
- The Hunting Association Konjic proposes installing cameras during the operational phase under the viaducts to monitor wildlife movement. This will help determine whether wildlife continues to follow their original paths or encounters obstacles that force them to turn back.
- The Consultant presented the entire Konjic (Ovcari) – Prenj Tunnel subsection to all participants, dividing it into segments before and after the Mladeskovici settlement. First segment: This section passes through the industrial zone and enters Zlatar, where tunnels are planned. There is a short 200-meter stretch between the tunnels. After the tunnels, the route crosses the Neretva River (Gornje Polje, above the mosque). This part is not particularly significant for wildlife migration, as it traverses an inhabited area where migration does not typically occur. Second segment: Initially, bridges and tunnels were planned for this section, which was a more favourable option for the local wildlife. Geotechnical investigations were conducted to evaluate soil stability. The findings indicated that the terrain is unstable, making tunnel construction unsuitable. As a result, the entire section will be built on embankments.
- The Hunting Association has not participated in public disclosure, presentation as part of the local EIA procedure or the Open House Days organised for the section.
- Near Bijela and towards Prenj, there was previously a federal hunting ground, but the final concession for managing this area has not yet been granted.
- The area of Borasnica and Rakov Laz is a winter habitat for large game, including chamois, roe deer, and wild boars. Bears descend during the

summer, though less frequently. In winter, chamois move down towards the streams. This area serves as a critical connection between the southern and northern parts of Prenj, as wildlife migration is blocked by rocky terrain at higher elevations.

- Hunting will also be prohibited within 100 meters of the motorway.
- The hunting organisation's request to JPAC is to leave natural crossings for wildlife – at least 2 migration crossings. Specifically, in the Mladeskovici area, particularly the stretch from Vidackovici to Gornja Bijela, these crossings are essential. Without them, the entire area would be blocked, preventing any wildlife migration.
- There is no existing data on population numbers and wildlife assessments. While these assessments are typically conducted annually within the natural foundation, the lack of an assigned hunting ground has prevented this from taking place, resulting in the absence of specific and accurate data.
- A specific portion of the area should be incorporated into the future national park. In terms of biodiversity, the region supports a wide range of species, including jackals, bears, wolves, foxes, wildcats, and rabbits, among others.
- Since no association or institution currently manages the area, there are no regulations governing hunting activities. Hunting is not permitted without approval from the relevant Cantonal Ministry of Agriculture, Water Management and Forestry. While no hunting activities are being carried out, supplemental feeding does take place. These feeding sites are not significantly impacted, as they can be relocated if necessary.
- There are currently no digital records of hunting ground boundaries. These boundaries are determined by the Cantonal Ministry. In the Konjic area, there were two hunting associations — one established in 1967 and the other active between 1922 and 1954.
- The Konjic municipality has two hunting grounds: Neretvica, covering 27,000 hectares, and another hunting ground spanning 69,000 hectares. Both areas have hand-drawn maps, and digitalisation is anticipated once the hunting grounds are officially assigned to the relevant authorities.
- The Hunting Association counts approx. 850 members.
- At the end of the meeting, the Consultant inquired whether participants were aware of any speleological objects in their hunting areas, given their frequent presence in the field. The participants responded that they do not know about any caves, and due to the area's seismic activity, there are no caves.

Meeting with Forest Management Company "Sumarstvo Prenj"

Date: 6 December 2024
Time: 12:00h, duration: 1h
Place: Sumarstvo Prenj office
Topic: Discussion on concerns raised by Sumarstvo Prenj regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Sumarstvo Prenj representatives and Enova

The course of the conversation:

- Representatives of Sumarstvo Prenj highlighted that the initial segment of the route, up to Zlatar, poses no challenges from the perspective of forest management. They emphasised Zlatar as a significant area, primarily due to plant species that thrive on dolomite substrates (dolomitophytes).
- In 1956, the area above the town of Konjic (Zlatar-Vrtaljica hill) was designated as a botanical reserve due to its rich biodiversity. Within the sections managed by Sumarstvo Prenj, unique species of ground flora have been identified, specific to the dolomitic terrain around Konjic—classified as stenoendemics. The representative highlighted key stenoendemic species, including *Thymus humifusus* var. *aureopunctatus*, *Alyssum moellendorfianum*, and *Acinos orontius*. Other endemic species mentioned include *Dianthus prenjus*, *Micromeria croatica*, *Lathyrus friedrichsthalii*, *Euphrasia dinarica*, and *Orchis pauciflorus* f. *Zlatari*.
- A new plant species, *Sorbus latifolia*, has recently been discovered on Zlatar, marking a significant contribution to global flora. This finding was communicated to Sumarstvo Prenj by the professor from the Faculty of Forestry in Sarajevo[2].
- Sumarstvo Prenj representatives described Zlatar as a treasure trove of plant life, akin to a botanical garden with extraordinary biodiversity. They stressed the importance of preserving this ecological richness for future generations.
- The Konjic (Ovcari) – Prenj Tunnel subsection intersects with forest roads. Sumarstvo Prenj highlighted two critical collision points: one on Zlatar Hill (planned for reconstruction soon) and the main forest road in Mladeskovici. These roads will face disruption during construction of the motorway, posing a significant social concern. Sumarstvo Prenj is open to providing JPAC/Contractor access to the necessary forest roads for construction purposes, on the condition that appropriate compensation is

[2] Clarification note (Enova): The species in question (*Sorbus latifolia*) has been previously confirmed in Bosnia and Herzegovina, as documented in the following reference: Hajrudinovic-Bogunic, A., Basic, N., & Bogunic, F. (2012). *Sorbus latifolia* (Rosaceae): A new species in the flora of Bosnia and Herzegovina. *Special Editions CXLVIII. Proceedings 22*, 175-186. DOI: 10.5644/proc.bd-01.10.
There is a possibility that the statement is a misunderstanding or that is refers to the discovery of a new locality in BiH, hybrid or variety rather than a completely new species. This will be verified with relevant experts to ensure accurate and up-to-date information is presented in the Environmental and Social Impact Assessment (ESIA) Study.

provided. They will supply maps and layouts of the forest roads to facilitate the overlay of project sections and the identification of collision points.

- The fire-damaged site on Homolje is being considered for reforestation as compensation measure in the ESIA. The key question was whether reforesting this site would be an appropriate compensatory measure. Sumarstvo Prenj concluded that this site is suitable for compensation, as efforts to restore the area are already underway.
- There is a total of 10,000 hectares of fire-damaged land in the Konjic area in the last 15 years suitable for such reforestation efforts.
- Sumarstvo Prenj has approximately two million seedlings, and 20% of the Konjic municipality is managed by forestry. For this Project, offset will need around 4,000 to 5,000 seedlings. Sumarstvo Prenj emphasises that the proposed quantity of seedlings does not pose a challenge for future reforestation efforts. Additionally, if the originally proposed location is reforested by the time compensation measures are implemented, they are prepared to suggest alternative sites for reforestation.
- Representatives of Sumarstvo Prenj stated that there is no "old forest" in Bijela due to regular tree-cutting activities in the area. Additionally, they are unable to provide information on the forest's age. However, they will provide more information upon review of the KMZ file showing the route.
- Previously, Sumarstvo Prenj operated a nursery near the motorway adjacent to the Bijela settlement. However, the nursery has since been relocated to a new site, and they no longer manage the original location.
- There are claims that lynx have been observed at the foot of Prenj Mountain. Allegedly, a professor from the Faculty of Forestry, University of Sarajevo confirmed evidence supporting the presence of this species. Additionally, one of the meeting participants (the director of Sumarstvo Prenj) reported seeing a lynx on his property near Mladeskovici about 15 years ago.
- Representatives of Sumarstvo Prenj stated that otters are occasionally seen in the area they operate, even in urban areas of Konjic and near sewage outfalls.
- The Forest Management Plan is no longer valid, and there is currently no cantonal forestry law in place. As a result, Sumarstvo Prenj is unable to acquire an approval for the development of new Forest Management Plan from the relevant cantonal ministry. They are still governing forests in line with the old Plan which expired in 2014, based on yearly plans.
- While the City Council can approve the annual plan, the ten-year plan falls under the jurisdiction of the relevant Ministry, which has refused to grant approval for its preparation.
- Between 30-40% of the forest resources are affected by illegal logging, primarily carried out by the local population. The annual logging plan, both before and after the war, was 60,000 m^3, but the extent of illegal logging matches this planned volume.

Meeting with Biospeleological Organisation "Biospeld"

Date: 5 December and 13 December 2024
Place: Online, Microsoft Teams
Topic: Discussion on identification, mapping, and biospeleological assessment of speleological objects regarding the motorway section Konjic (Ovcari) - Prenj Tunnel - Mostar North
Attendees: Biospeld Vice President and Enova

The course of the conversation on the 1st meeting:

- The Speleological Association Herceg, Mostar, has a cadastral register of speleological objects in Mostar area, including Prenj Mountain.
- The Tular Laboratory, Kranj, is entitled for conducting biospeleological research and eDNA (environmental DNA) analyses. This laboratory specialises in researching the species *Proteus anguinus* (olm) and has developed a methodology for sampling and analysing eDNA specifically for this species. These circumstances are desirable as eDNA analysis is under high risk of contamination. The aforementioned lab has also conducted research in Bosnia and Herzegovina.
- There is not much information available about speleological objects on Prenj, but it is emphasised that they do exist, especially on the Prenj plateau.
- eDNA analyses make sense only in speleological objects where the presence of water has been confirmed, and the analysis should be specifically targeted at *Proteus anguinus* (olm), not all species.
- Biospeld Vice President also suggests that taking water samples from fast-moving streams is not advisable, and that it is only appropriate to find the connection of underground waters by colouring and then take water samples that are proven to come from Prenj.
- If speleological research were to be conducted, field mapping and searching should be done in early spring, when the terrain is accessible and there is no vegetation. On the other hand, water sampling from speleological objects can be done only after heavy rains, i.e., in the summer. This requires the engagement of separate teams.
- For more serious research, team of speleologists and biospeleologists should be engaged.
- eDNA samples are prone to cross-contamination, which is a challenging factor for this method. Therefore, analysis cannot be conducted in the laboratory of the Department of Biology at the Faculty of Natural Sciences and Mathematics at University of Sarajevo.
- Biospeld Vice President provided the example of tunnel drilling in Croatia, the Sveti Ilija Tunnel (Biokovo, Croatia), where large cavities opened during construction. The exact number of opened cavities is not known, but three are currently under regular monitoring by biospeleologists. When the tunnel was built, access was created in the service pipe to allow representatives of protected areas and biospeleologists to enter these cavities for monitoring purposes.
- Biospeld Vice President offered to contact the Speleological Association Herceg from Mostar and to provide the Consultant with an offer for

speleological research, including eDNA. Updates will be provided in due date.

The course of the conversation on the 2nd meeting:

- The representatives of the Speleological Association Herceg from Mostar shared that they know of approx. 10 speleological objects on the Prenj Mountain that are above the planned motorway route. They also expect approx. 10 more to be present.
- The process of surveying for speleological objects would include the walkover of the entire area above the Prenj tunnel as it cannot be excluded that the speleological objects may reach the tunnel despite it being over 1 km under the mountain at certain points.
- If the speleological object is found and is previously unsurveyed (as is the case with all objects on Prenj Mountain), a separate, well rested team with at least three members is to be engaged to perform the mapping. The effort needed for the mapping depends on the size and depth of the object and cannot be determined at this stage. Average time needed for smaller objects up to 100 m of length/depth is 1-2 days. Upon mapping, biospeleologists are able to to enter the object and take fauna samples, whether it be the individual specimens or eDNA if no macrofauna is noted.
- eDNA analysis would take up to a month, but possibly even up to 2 weeks depending on the laboratory's availability.
- The possibility of eDNA analysis of springs with water known to originate from Prenj Mountain was also explored as an option. Biospeld Vice President also confirmed this would give insight into the possible presence of *Proteus* in the Prenj area. This would require the engagement of speleo scuba divers. Biospeld Vice President will explore the possibility of performing diving and water sampling activities during winter for informative purposes. This approach was later dismissed due to the accessibility of springs hydrologically connected to Mt. Prenj. Instead, water sampling was conducted directly at known springs that receive groundwater from Mt. Prenj.
- All of the aforementioned activities must be done after the permit is obtained.