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Interconnection, Subsection: Konjic
(Ovcari) - Prenj Tunnel - Mostar North

Gap Analysis & ESIA Disclosure Pack

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Volume 6: Stakeholder Engagement Plan

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CONTENTS

1	Introduction	6
1.1	Description and the Context of the Project	6
1.2	Objectives and Scope of the Stakeholder Engagement Plan	7
2	Regulatory Requirements for Stakeholder Engagement	9
2.1	Local Legislation Requirements	9
2.2	EBRD Requirements	10
2.3	EIB Requirements	11
2.4	Key Differences between Local Legal Framework and Lenders' Requirements	11
3	Previous Stakeholder Engagement	13
4	Identification of Stakeholders	19
5	Stakeholder Engagement Program	22
5.1	Introduction	22
5.2	Responsibility for SEP Implementation	22
5.3	Available Communication Tools and Resources	22
5.4	Planned Information and Communication Arrangements	24
5.5	Consultation and Engagement Objectives and Approaches	26
6	Grievance Management	37
7	Monitoring and Reporting	43

APPENDICES

Appendix 1: Public Grievance Form	44
Appendix 2: Text for the Public Grievance Leaflet	45
<i>Appendix 3: Project Grievance Registry – Template</i>	48
Appendix 4: Flowchart for Processing Grievances	49
Appendix 5: Internal Stakeholder Engagement Registry – Template	50

List of abbreviations

Abbreviation	Meaning
BiH	Bosnia and Herzegovina
DG MOVE	Directorate-General for Mobility & Transport
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
EBRD	European Bank for Reconstruction and Development
EBRD ESP	EBRD's Environmental and Social Policy
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
EU	European Union
FBiH	Federation of Bosnia and Herzegovina
FMoET	Federal Ministry of Environment and Tourism
FMSP	Federal Ministry of Spatial Planning
JPAC	Motorways of the Federation of Bosnia and Herzegovina
LARF	Land Acquisition and Resettlement Framework
LARP	Land Acquisition and Resettlement Plan
LC	Local Community
MoCTBiH	Ministry of Communications and Transport of BiH
MoFTBiH	Ministry of Finance and Treasury of BiH
NGO	Non-governmental Organisation
NIPAC	National Instrument for Pre-accession Assistance Coordinator
NTS	Non-Technical Summary
PAP	Project Affected People
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan

1 Introduction

1.1 Description and the Context of the Project

PC Motorways of the Federation of Bosnia and Herzegovina ("JPAC") is a public company from the Federation of Bosnia and Herzegovina (FBiH) in charge of management of motorway construction and management, maintenance, and protection of motorway operation in FBiH. One of JPAC's key projects is the development of the motorway which is part of the Trans-European Corridor Vc connecting Budapest (Hungary) and Port of Ploce (Croatia). The total length of Corridor Vc in FBiH is approximately 335 km. Over 100 km of the motorway is already constructed and operational.

The Corridor alignment is divided into four LOTs, as shown in the Figure 1 below. The subsection Konjic (Ovcari) – Prenj Tunnel – Mostar North belongs to the LOT 3 of the Corridor.

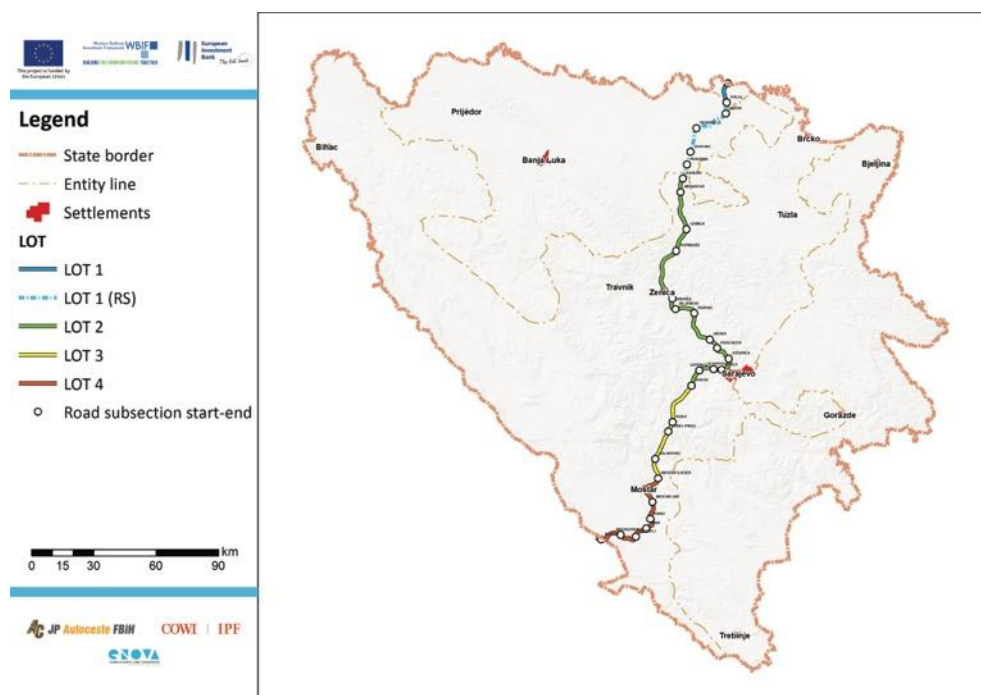


Figure 1: LOTs of Corridor Vc in Bosnia and Herzegovina

The European Bank for Reconstruction and Development ("EBRD") as the lead IFI and the European Investment Bank ("EIB") as the co-financier (together: the Lenders) are considering providing financing to JPAC to construct a new motorway on subsection Konjic (Ovcari) – Prenj Tunnel – Mostar North on Corridor Vc (the "Project").

This motorway subsection is further divided and will be designed and constructed under three separate contracts as follows:

- > Konjic (Ovcari) – Prenj Tunnel, Length=11.50 km
- > Prenj Tunnel, Length=10.16 km + 1.20 km of the route before the tunnel
- > Prenj Tunnel – Mostar North, Length=12.40 km

Total length of the subsection from Konjic (Ovcari) to Mostar North, Length=35.26 km.

In addition, the south connection to main road M17, which has a role to bypass around Konjic urban area (hereinafter: Konjic Bypass), will connect the motorway at Ovcari Interchange with the M17 to Jablanica. This bypass will allow for M17 traffic to access the motorway directly without entering the urban area of Konjic.

The project is categorised as Category A project in line with EBRD's Environmental and Social Policy (2019)¹, and Projects categorised as A require a formalised and participatory environmental and social impact assessment and disclosure and consultation process. More information can be found in EBRD's Access to Information Policy (AIP) and Directive on Access to Information (DAI)².

The comprehensive description of the entire alignment with detailed maps showing the Project area are provided in Volume 1: Environmental and Social Impact Assessment Report (Chapters 1-5: Introductory Chapters).

1.2 Objectives and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by JPAC in order to create open and transparent engagement and communication between JPAC and other interested and affected parties throughout the entire Project lifecycle.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the laws of FBiH, as well as the requirements of the EBRD and EIB.

¹ According to EBRD, a project is categorised A when it could result in potentially significant environmental and/or social impacts that are additional and new and therefore require an environmental and social impact assessment. EBRD's ESP is available at: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

² EBRD's AIP and DAI can be found at: <https://www.ebrd.com/what-we-do/strategies-and-policies/access-to-information-policy.html>

This SEP is a live public document which will be updated by JPAC at key points of changes in Project activities compared to what is known at this Project stage or any new developments in Project scope, but at a minimum once every two years, to inform on-going stakeholder engagement through the various stages of Project development.

2 Regulatory Requirements for Stakeholder Engagement

2.1 Local Legislation Requirements

As a public enterprise, JPAC is required to apply the provisions of the *Law on Free Access to Information in FBiH*³, i.e., to **provide access to information to all stakeholders**, including every natural person or legal entity. In the framework of its capabilities, it is required undertake all necessary measures to provide assistance to natural persons or legal entities seeking to exercise their rights. JPAC has a dedicated page on its website⁴ with a published guidance for access to information and a request form for access to information.

It is also required, in accordance with the *Law on Public Enterprises in FBiH*⁵, to operate on the **principle of freedom of access to information** and make publicly available on its website all information regarding its work, organisation and financial management.

In addition, the *Law on Environmental Protection of FBiH*⁶ stipulates that every person and every organisation must have **adequate access to information regarding the environment** which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision-making process. This Law also regulates the Environmental Impact Assessment (EIA) procedure and prescribes that **public hearings must be organised for projects that require an EIA**. The EIA must be made available to the public and a copy sent to relevant authorities and other interested parties, allowing 30 days for submitting comments, after which a public hearing is organised, and the public is invited via printed (or electronic) media/radio/TV, at least 15 days in advance. Public suggestions and comments can be submitted to the Federal Ministry of Environment and Tourism in written form within 15 days from the date of the public hearing. The EIA Study is approved after the EIA is revised and all the relevant comments received from interested parties are taken into consideration.

In line with the *Decree on Single Methodology for Developing Spatial Planning Documents*⁷, **public participation must be ensured during all stages of the development of spatial planning documents**. Spatial plan developers are required to prepare a Public Participation Program, which includes provisions for public involvement at all stages. In addition, spatial planning documents must contain evidence of public consultations, such as minutes from public hearings.

³ Official Gazette of FBiH, No. 32/01

⁴ <https://www.jpautoceste.ba/pravo-na-pristup-informacijama/>

⁵ Official Gazette of BiH, No. 81/08

⁶ Official Gazette of FBiH, No. 15/21

⁷ Official Gazette of FBiH No. 63/04, 50/07 and 84/10

The public consultation process in line with spatial planning requirements is described in Chapter 3 (Previous Stakeholder Engagement)

Strategic Environmental Assessments for such planning documents are not conducted as the legal framework is not sufficiently developed yet.

In addition, according to the *Law on Physical Planning and Land Use at the Level of FBiH*⁸, prior to the issuing of Construction Permits, the Federal Ministry of Physical Planning has to provide **public access to the Main Design**, and inform the public by means of a public announcement. The public is allowed 15 days for the submission of comments.

Furthermore, BiH acceded to the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters** in 2008. The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2I of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of [a public authority].” In line with the Convention, JPAC is required to:

- > respond **to requests from the public for environmental information** (any member of the public can make a request, regardless of citizenship, nationality or domicile);
- > **regularly collect and disclose environmental information to the public** and notify the public that the information is available; and provide information for emergencies.

2.2 EBRD Requirements

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) in its 2019 Environmental and Social Policy (ESP)⁹, that projects are expected to meet. Specifically, PR 10 (*Information Disclosure and Stakeholder Engagement*) emphasises the importance of open and transparent engagement between the project, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly

⁸ Official Gazette of FBiH, No. 2/06, 72/07, 32/08, 4/10, 13/10 and 45/10

⁹ Available at: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EBRD's ESP contains specific disclosure and consultation requirements for "Category A" projects. The environmental and social impact assessment process includes a public disclosure and consultation process as specified in PR 10. Where an Environmental and Social Action Plan (ESAP) has been agreed between EBRD and the project, the project must disclose the ESAP to the affected parties. The project must keep the environmental and social impact assessment in the public domain throughout the life of the project, but it may be amended, from time to time, with additional information, or archived following project completion, as long as it is available on request in a timely manner.

The client is required to provide regular reports to its interested and affected stakeholders on its environmental and social performance, as a separate publication, or on its website. These reports must be in a format accessible to the affected communities and their frequency will be proportionate to the concerns of affected communities, but not less than annually.

2.3 EIB Requirements

EIB requirements are set out in its Environmental and Social Standards (2022)¹⁰. Standard 2 on Stakeholder Engagement Standard 2 promotes an inclusive and systematic approach to engaging constructively with stakeholders. It recognises the importance of stakeholder engagement, as a means to ensure respect for the rights to: (i) access to information; (ii) public participation in decision-making processes; and (iii) access to justice.

Standard 2 requires promoters of projects with significant environmental and/or social impacts and risks to ensure an effective engagement process by planning it thoroughly and preparing a Stakeholder Engagement Plan early in the process and to seek feedback from stakeholders on its content, including on the identification and analysis of stakeholders and proposed engagement activities.

It further requires promoters to ensure timely disclosure of information and meaningful consultation to allow for effective stakeholder participation.

2.4 Key Differences between Local Legal Framework and Lenders' Requirements

The following gaps between BiH legislation and EBRD/EIB requirements have been identified:

- > Both Lenders require the development of a Stakeholder Engagement Plan, to guide the disclosure of Project documents and consultations with affected people and other stakeholders;

¹⁰https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf

- > Both Lenders require a very proactive approach in obtaining the public opinion and identifying and engaging with all stakeholders, as opposed to a reactive approach, i.e., responding only to comments/questions submitted and issues raised, after they have been submitted/raised;
- > Particular attention is required by EBRD/EIB in identifying and engaging with vulnerable groups;
- > The establishment and implementation of a Project dedicated grievance mechanism (accessible for all stakeholders, including vulnerable groups) is required by EBRD/EIB, in addition to national administrative and judicial grievance procedures;
- > Consultations with stakeholders, according to EBRD/EIB requirements, should be on-going for the duration of the Project as opposed to consultations concentrated during the permitting period.

This SEP has been developed to address the above listed gaps and to ensure that all EBRD/EIB requirements in connection to stakeholder engagement are being adequately addressed by the Project.

3 Previous Stakeholder Engagement

The table below contains a summary of previous consultation activities of relevance for this Project.

Table 2: Summary of previous consultation and stakeholder engagement activities

Stage	Summary of activities and issues of concern
Public consultations in line with environmental permitting requirements	<p><u>Initial public consultations related to the Preliminary EIA</u></p> <p>In 2005 and 2006, public consultations for the Preliminary EIA were organised by FMoET in cooperation with the state-level Ministry of Transport and Communications. According to the official Minutes of the Meetings, these were held:</p> <ul style="list-style-type: none"> > in June 2005 in the Municipality of Hadzici in Canton of Sarajevo (attended by 33 people); Municipality of Jablanica (attended by 25 people); Municipality of Konjic (attended by 54 people); and in the Municipality of Mostar (no information on the number of attendees), > in September 2006 in the Municipality of Jablanica (attended by 63 people) and in the Municipality of Konjic (attended by 30 people), and in October 2006 in the Municipality of Mostar (attended by 51 people). <p>A number of local community representatives and NGOs attended these consultations. Key issues and concerns discussed included: the need to take into account protection of water sources and water protection zones, noise impacts, disposal of excavated materials, issues related to the route and the possibility of negative impacts on the future National Park (Prenj, Cvrstica and Cabulja), especially because of the exceptional geomorphology and mountain Prenj as an endemic centre.</p> <p><i>It should be noted that the design of the section Konjic (Ovcari)-Mostar North discussed at the time is different from the final adopted route through the Bijela River valley and 'Tunnel Prenj' which was later chosen on 12 February 2016 by the Government of FBiH and approved by the Parliament of FBiH. Therefore, a new set of consultations was held in 2018 as described below.</i></p> <p><u>New public consultations related to the EIA for motorway section Konjic (Ovcari)-Mostar North</u></p> <p>JPAC initiated the environmental permitting procedure for the section Konjic (Ovcari Interchange)-Mostar North by preparing the EIA Study in 2016 for this motorway section, including Tunnel Prenj. The EIA study was publicly disclosed for 30 days, and two public consultations were organised by</p>

	<p>Federal Ministry of Environment and Tourism (FMoET) in 2018. The first was held in Konjic on 23 April 2018, and the second was held in Mostar on 30 April 2018. The first was attended by 49 people, and the second by 15 people. Following the public meetings, additional time was given for submission of public comments. A number of local community representatives and NGOs participated in these consultations. The key issues and concerns raised included the need to conduct monitoring of the environmental baseline, to protect agricultural land during construction, to take into account the water sources and protected species of the Prenj massif, to define measures for traffic management, etc. After the public consultation process, the EIA study was amended in 2018 to take into consideration the received comments, after which FMoET approved the EIA study in December 2018.</p> <p>Although the EIA Study was approved, the Environmental Permit was not obtained. The main reason was the lawsuit filed by the Municipality of Jablanica which requested the connection to the motorway which is not foreseen by the Preliminary Design. The cantonal court in Sarajevo passed a verdict on 25 June 2021 that the Conclusion of the Federal Ministry of Environment and Tourism on approving the EIA Study is annulled and the EIA procedure must be carried out again. The new EIA Study is currently under preparation.</p>
Public consultations in line with spatial planning requirements	<p><u>Spatial Plan of FBiH 2008-2028</u></p> <p>According to the report on consultations undertaken during the development of Spatial Plan of FBiH 2008-2028, a public consultation meeting was organised in Mostar in March 2012. Issues raised related to the Corridor Vc were not relevant for this motorway section.</p> <p><u>Spatial Plan for Area of Special Interest to FBiH – Motorway on Corridor Vc</u></p> <p>Two public hearings for the Spatial Plan were organised in 2011:</p> <ul style="list-style-type: none"> > a public hearing in Mostar in November 2011 by the Federal Ministry of Spatial Planning, and > a public hearing in Sarajevo in November 2011 by the BiH Parliament (Committee for Transport and Communication). <p>No official Minutes of Meetings are available.</p> <p>The Plan was amended and adopted by the FBiH Parliament and officially published in December 2017. No official Minutes of Meetings are available for any stakeholder consultations that may have been carried out for amendments to the Plan.</p>

	<p>The long period between the public hearings (in 2011) and the adoption of the Plan (2017) is due to environmental concerns raised by municipal/city authorities in the meantime, such as the issue of protecting the planned future National Park Prenj-Cvrtnica-Cabulja, the inclusion of the Konjic interchange-connection, and other changes to the local EIA study – <i>please see the item above for information on EIA study approval.</i></p> <p><u>Spatial Plan of Herzegovina-Neretva Canton (HNC)</u></p> <p>In June 2018, the Government of HNC adopted the Proposal of the Spatial Plan for HNC. This Proposal of the Spatial Plan for HNC was available to the public through a series of public hearings held in Stolac, Mostar and Jablanica in April and May 2017. The Spatial Plan was finally adopted in 2021. During these public hearings and the public review process, no particular comments of relevance to the Project were received. Only the representatives of the Municipality of Jablanica raised the issue of a connection to Jablanica, to which it was responded that the Spatial Plan for HNC is aligned with the FBiH level spatial plans. It should be noted that the Parliament of FBiH issued in 2017 a decision which states that a connection for Jablanica to the motorway must be provided, along with modernising a portion of the existing M-17 road which would run north from Jablanica to the connection to the motorway.</p>
Request from the City of Konjic	<p>The City of Konjic sent a request in 2005 to JPAC to consider an additional interchange – connection to Konjic in the design phase, on the site from the Neretva River to the site Vrabac, which would provide a bypass around the city, connection to industrial zone, good access to the mountain Prenj, Boracko Lake, the upper course of the Neretva River with all settlements, the planned National Park, as well as a better connection with the RS entity. JPAC accepted this request and asked the designers to consider this additional interchange in the design phase. Consequently, the Konjic South Interchange was added in the current design in 2022.</p>
Consultations with households during the development of this ESIA	<p><u>Socio-economic surveys by the Consultant in 2021 and 2022</u></p> <p>Socio-economic surveys were conducted among 132 households living in the wider study area¹¹ to solicit their opinions about Project impacts and compensation arrangements, as well as to obtain specific data on current</p>

¹¹ These are: 1) settlements through which the motorway directly passes (Ovcari, Tresanica, Gornje Polje, Polje Bijela, Bijela, Mladeskovici, Podgorani, Humilisani, Potoci and Kutilivac); 2) settlements through which the Konjic Bypass directly passes: Ovcari, Vrbici, Galjevo, Repovica, Donje Selo and Drecelj; 3) additional settlements (all in Konjic) which have a potential to be affected by the Project: Prevlje, Josanica, Glavicine and Dzepi.

	<p>livelihoods and living conditions of households, including the identification of vulnerable categories. Their views were considered during the development of the ESIA.</p> <p>Almost all (97.7%) of the surveyed households stated that they have been informed about the Project, mostly through media (TV and online media) and informally through other local residents. While two thirds (65.1%) are satisfied with the level of information received so far, 22.7% are partially satisfied, whereas 10.6% expressed the need for better information about the Project through organised meetings with JPAC, local communities, and municipalities, as well as public hearings and media news. To address these needs and ensure adequate stakeholder engagement, comprehensive disclosure and engagement methods have been designed and are included in this Stakeholder Engagement Plan (please see section 5.4 - Planned Information and Communication Arrangements).</p> <p>83.3% of the surveyed households indicated that they have a positive opinion about the Project.</p>
<p>Consultations with Local Community Offices during the development of this ESIA</p>	<p>In June 2021 and August 2022, consultation meetings were organised with the representatives of five Local Community Offices (LCOs): Centar, Dzepe, Bijela, Bijelo Polje and Tresanica (including its branch office "Donje Selo"). Key topics discussed during these meetings were related to the water sources used by the inhabitants, use of land plots and roads, livelihoods of the local population, familiarity with the Project and concerns regarding perceived Project risks and impacts.</p> <p>Representatives of LCOs Centar, Dzepe and Tresanica stated that they were not informed about the Project by JPAC, municipality or any other institution and that all information they have were obtained through publicly available means. The main concerns regarding the perceived Project risks and impacts reported by the representatives of LCOs were related to the water source Bosnjaci located at a distance of approx. 1 km of the motorway section alignment. The concerns are related to the possible impacts of the construction of Tunnel Orlov Kuk on this water source which is used by many settlements. Additional concerns were related to the need to relocate some existing local roads. LCO representatives emphasised the need to have new connection roads at locations where the existing local road will be cut by the motorway, in order to have access to other land plots and touristic places in the surrounding area. LCO representatives also expressed concerns regarding construction work impacts (such as traffic restrictions). All these concerns were</p>

	addressed in the Project ESIA and accompanying ESMP, which are part of the Project disclosure package (please see section 5.4.1 - Documents and Information to be Disclosed).
Consultations with NGOs during the development of this ESIA	<p>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.</p> <p>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.</p> <p>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 Tresanica River and wildlife migrations. All these concerns were addressed in the Project ESIA and accompanying ESMP, which are part of the Project disclosure package (please see section 5.4.1 - Documents and Information to be Disclosed).</p>
Consultations regarding the ESIA Disclosure Package	<p>The Open House Days were organised after the ESIA disclosure in June 2024, and attracted 65 participants across Konjic, Jablanica, and Mostar, focusing on key issues like land acquisition, resettlement, environmental concerns, and infrastructure impacts. Discussions in Konjic emphasised importance of expropriation transparency, additional assessments regarding environmental impacts, and importance of existing access road protections. Stakeholders from Jablanica focused on regional connectivity and alternative routes, while Mostar addressed environmental protection, tunnel safety, and landowner concerns. Feedback included detailed assurances about environmental studies, road restoration, and project communication. After these meetings, Ekodvogled and Bankwatch raised additional ESIA-related concerns through follow-up letters.</p>

	<p>All these concerns were addressed in the Project ESIA and accompanying ESMP, which are part of the Project disclosure package (please see section 5.4.1 - Documents and Information to be Disclosed).</p>
<p>Additional consultations after Open House Days</p>	<p>In early December 2024, meetings were held to address environmental concerns raised during the Open House Days with:</p> <ul style="list-style-type: none"> > The Hunting Association "Koznik" Konjic – emphasised the motorway's impact on wildlife migration and hunting activities. > The Forest Management Company "Sumarstvo Prenj" discussed several important topics. These included the need for biodiversity preservation, the identification of critical forest road intersections, and the plan for reforestation of fire-damaged areas with seedlings provided by the Company. The meeting also addressed illegal logging, which affects 30-40% of resources, and the presence of wildlife such as lynx and otters, particularly near Prenj Mountain and in Konjic. > The Biospeleological Organisation "Biospeld" focused on speleological research, including the identification of speleological objects in the Prenj area, eDNA analysis for <i>Proteus anguinus</i> (olm), and sampling guidelines. It was suggested that research should involve collaboration with experts for mapping, sampling, and diving. Special attention was given to the need for permits and the timing of fieldwork to optimise results, with additional studies to explore springs for olm presence. <p>All these concerns were addressed in the Project ESIA and accompanying ESMP, which are part of the Project disclosure package (please see section 5.4.1 - Documents and Information to be Disclosed).</p>

4 Identification of Stakeholders

Identified key project stakeholders are at BiH, regional and local level. They are as follows:

- 1 The Beneficiary/Promoter:
 - > Ministry of Finance and Treasury of BiH (MoFTBiH);
 - > Ministry of Communications and Transport of BiH (MoCTBiH);
- 2 The End Beneficiary:
 - > Ministry of Transport and Communications of FBiH (MoTCFBiH);
 - > JPAC/Project Implementation Unit (PIU);
- 3 The Financiers
 - > European Bank for Reconstruction and Development (EBRD) as lead financier
 - > EIB as co-financier
- 4 European Union (EU):
 - > DG NEAR;
 - > DG MOVE;
 - > EU Delegation in BiH;
- 5 National Instrument for Pre-accession Assistance Coordinator (NIPAC);
- 6 Environmental and spatial planning authorities:
 - > Federal Ministry of Environment and Tourism (FMoET);
 - > Federal Ministry of Spatial Planning (FMSP);
 - > Agency for Watershed of the Adriatic Sea;
- 7 Natural and cultural heritage authorities:
 - > Commission to Preserve National Monuments of Bosnia and Herzegovina;
 - > Institute for the Protection of Monuments of Federation of Bosnia and Herzegovina;
 - > Institute for the protection of cultural – historical heritage of Herzegovina – Neretva Canton;
- 8 Local governments:
 - > City of Konjic;
 - > City of Mostar;
- 9 Local communities:
 - > LCs within the City of Konjic (Dzepe, Tresanica, Centar and Bijela);
 - > LC within the City of Mostar (Bijelo Polje)
 - > Settlements through which the motorway directly passes: Ovcari, Tresanica, Gornje Polje, Polje Bijela, Bijela, Mladeskovici, Podgorani, Humilisani, Potoci and Kutilivac
 - > Settlements through which the Konjic Bypass directly passes: Ovcari (same settlement as the start of motorway section), Vrbici, Galjevo, Repovica, Donje Selo and Drecelj
 - > Additional settlements (all in Konjic) within the wider study zone (within a zone of 500-600 m from the footprint) which have a potential to be affected by the Project: Prevlje, Josanica, Glavicine and Dzepe
- 10 Project affected persons (PAPs) affected by land acquisition
- 11 Representatives of religious communities:

- > Orthodox Rectory Konjic
- > Islamic Community of Konjic
- > Islamic Community of Mostar
- 12 Public utility companies (water supply and wastewater, waste management during construction, electricity and telecommunication lines and ducts, cemetery management, etc.)
- 13 NGOs:
 - > Aarhus Centre
 - > NGO Neretva Zeleni
 - > NGO Dinarica
 - > NGO Farmer
 - > Fruit Growers Association Konjic
 - > NGO Travel Konjic
 - > Hunting Association Konjic
 - > Sports Fisherman Organisation Konjic
 - > Hunting Organisation Koznik
 - > Biospeleological Organisation Biospeld
 - > Mountain Bike Organisation Konjic
 - > NGO Boj
 - > Tourism Association Mostar North
 - > Organisation of Fighters and Defenders of Konjic
 - > Association of Serb Returnees Neretva – Konjic
 - > NGO Fondoko
 - > NGO Center for Ecologically Sustainable Development of BiH (COOR)
 - > NGO Eko Neretva
 - > NGO Cetina Prenj
 - > Bankwatch
 - > *Other NGOs as may be identified during the disclosure and consultation period.*
- 14 Public Companies: The Forest Management Company “Sumarstvo Prenj” is important stakeholder, contributing to activities related to reforestation, biodiversity management, and other environmental concerns.
- 15 Media.

A summary of stakeholder importance and influence on the project’s activities is given in the Stakeholder Matrix in Table 1 below.

Table 1: Stakeholder Matrix

		Interest of Stakeholder	
		Low	High
Influence/power of stakeholder	High	FMoET FMSP Agency for Watershed of the Adriatic Sea	MoFTBiH MoCTBiH MoTCFBiH JPAC EBRD and EIB EU and NIPAC Media
	Low	Public utility companies	Local governments Natural and cultural heritage authorities Representatives of religious communities Local communities PAPs (affected land and property owners/users, businesses and road users) NGOs

In the Stakeholder Matrix, main stakeholders are assessed and mapped according to their influence and interest. According to this assessment, stakeholders such as MoFTBiH, MoCTBiH, MoTCFBiH, JPAC, EBRD/EIB, EU and NIPAC are assessed to have high power and high interest in the Project, and therefore may have the largest impact on project timely construction and operation of the Project.

Other environmental and spatial planning authorities, such as FMoET, FMSP and Agency for Watershed of the Adriatic Sea are assessed to have low interest but high influence during Project implementation because these institutions are the ones who issue the permits for Project implementation (Approval of EIA Study, Water Acts, Urban, Construction and Use Permits).

Media is also assessed among stakeholders with high influence and high interest as they can influence the perception and opinion of public in general, among them local communities and NGOs.

Public utility companies are assessed as stakeholders with low power and low interest, while stakeholders with high interest but low power are Local governments (City of Konjic and City of Mostar), Local Communities and residents and businesses in the vicinity of the Project area, Project Affected People and NGOs, which need to be continuously informed about the activities on the Project implementation.

5 Stakeholder Engagement Program

5.1 Introduction

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs. JPAC recognises that meaningful and timely engagement with stakeholders can enable the successful construction and operation of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended local benefits.

Project stakeholders have been identified in order to address various consultation requirements. Stakeholders include persons or groups that are:

- > directly and/or indirectly affected by the Project;
- > have certain interests in the Project and its activities;
- > have the ability to affect the Project itself and its final outcome.

Any stakeholders that are not identified at this stage of the Project (i.e., not included in Table 3, Section 5.5 of this document) may directly contact JPAC to make themselves and their needs known and to facilitate the effective implementation of the SEP.

5.2 Responsibility for SEP Implementation

The Project Implementation Unit (PIU) for this motorway section will be responsible for Project implementation, including the implementation of this SEP, under the supervision of the Lenders. The PIU will have a specific contact person for enquiries and grievances (see contact information in Chapter 6 of this SEP) under the Project-level grievance mechanism. *Note: Land related grievances will be managed separately by the JPAC Department of Property, Legal Affairs and Expropriation and the Division for Study Documentation, Social and Environmental Policy whose representatives will be part of the PIU, with specific contact details for each LARP to be defined in the LARPs.*

All contractors in charge of carrying out specific Project activities will also be required to meet Project standards and implement the relevant provisions of SEP (see Chapter 6 for more details). The grievance mechanism requirements will be laid out in the tender documentation and contracts that will be signed with the contractors.

5.3 Available Communication Tools and Resources

JPAC communicates with stakeholders and wider audiences directly, through live and online meetings and public consultations and indirectly, through different communication tools and resources.

JPAC additionally discloses information to the public through its official website (www.jpautoceste.ba) and its Facebook page (www.facebook.com/autoceste), as well as other digital (video, audio, software, or other content that is created, edited, stored, or accessed in digital form) and traditional media (radio, broadcast television, cable and satellite, print, and billboards). The Company's website is updated regularly and contains information on:

- > JPAC operations (work plans, financial and audit reports ¹², policies, procurement opportunities and decisions),
- > progress in relation to the planning, construction and operation of Corridor Vc,
- > issues in relation to land acquisition, environmental protection, cultural heritage, safety, tolling and traffic related information,
- > company contacts,
- > corporate social responsibility programme, etc.

Complaints or suggestions can be submitted directly to JPAC (personally or by telephone) or in writing by filling in the Public Grievance Form (by personal delivery, post or e-mail), as well as directly to the Contractor. Grievances may also be submitted anonymously. The formal Grievance Mechanism is described later in this document, and a copy of the Grievance Form is also provided (see Chapter 6 for more details).

5.3.1 Encouraging Participation of Vulnerable Groups

Specific attention will be paid to vulnerable groups to ensure that their views are also heard, recorded and taken into account in Project planning and implementation.

The groups that have been identified as potentially vulnerable under this Project include elderly persons, ill persons or persons with disabilities and low-income families.

These vulnerable individuals or households are more likely to be excluded from or unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. Therefore, consultation activities for this Project will be based on the principle of engaging all segments of the local society, including vulnerable individuals.

Some of the strategies that will be adopted to effectively engage with vulnerable groups and individuals will be:

1. Ensuring that information about all planned public meetings is available not only on the websites of JPAC and both cities but also on the bulletin boards of five Local Community Offices (LCOs) (Centar, Dzepe, Bijela, Bijelo Polje and Tresanica (including its branch office "Donje Selo")
2. Using adequate communication channels tailored to the needs of vulnerable groups (e.g., TV/radio for the elderly or distanced communities) – including

¹² Containing the information relevant to public disclosures.

ensuring that information about the publication of the disclosure package is publicised through local media

3. Accommodating the needs of women by organising meetings and public consultations at times suitable for women (given that women in Bosnia and Herzegovina tend to be responsible for the majority of domestic duties such as childrearing, cooking and cleaning)
4. Holding separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (in the premises of relevant LCOs)

These strategies are incorporated into the specific communication requirements in this SEP.

5.4 Planned Information and Communication Arrangements

JPAC will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project.

5.4.1 Documents and Information to be Disclosed

JPAC intends to disclose the following Project disclosure package:

- > This Stakeholder Engagement Plan (SEP);
- > Environmental and Social Impact Assessment (ESIA) including the Environmental and Social Management Plan (ESMP);
- > **Public Grievance Form (Appendix 1) and Public Grievance Leaflet (Appendix 2);**
- > **Non-technical Summary** (NTS) of the environmental and social assessment of the Project;
- > Biodiversity Management Plan (BMP);
- > **Land Acquisition and Resettlement Framework** (LARF) and subsequent Land Acquisition and Resettlement Plans (LARPs);
- > **Environmental and Social Action Plan** (ESAP).

The disclosure package will be publicly available in the local language (as well as English where available) immediately upon its availability, on the websites of JPAC (www.jpautoceste.ba), City of Mostar (www.mostar.ba), City of Konjic (www.konjic.ba), Municipality of Jablanica (www.jablanica.ba), the EBRD (www.ebrd.com) and the EIB (www.eib.org).

The documents will remain disclosed on these websites during a period of 120 calendar days prior to the consideration of the Project by the EBRD's Board of Directors and will remain publicly available throughout the life of the Project.

In addition, hard copies of the documents will be available at the following locations:

1. JPAC office in Mostar, Adema Buca 20, 88 000 Mostar

2. JPAC office in Sarajevo, Hamdije Kresevljakovica 19, 71000 Sarajevo
3. City of Mostar, Hrvatskih branitelja 2, 88000 Mostar
4. City of Konjic, Marsala Tita 62, 88400 Konjic
5. Municipality of Jablanica, Pere Bilica 15, 88420 Jablanica
6. EBRD office in Sarajevo, Fra Andjela Zvizdovica 1, 71000 Sarajevo.

Information about the publication of the disclosure package will be publicised in the local media (including TV/radio).

5.4.2 Planned Meetings

Locations of all meetings will take into account the needs of vulnerable households who travel options may be limited, such as in LCO offices in the Project area. Meetings will also be organised to take into account times accommodating the needs of women.

1) Meetings planned during the ESIA stage

JPAC will schedule and hold at least two public consultation meetings, one in Mostar and one in Konjic, after the disclosure of the documents listed above. In addition to these, JPAC will hold separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (in the premises of relevant Local Community Offices).

JPAC will inform all stakeholders about the exact date, time, and venue where the meeting will be held, at least 7, but preferably 14 days in advance, through the following channels:

- > the official website of JPAC and its Facebook page,
- > the official website of the City of Mostar, City of Konjic,
- > local newspapers in wide circulation in FBiH,
- > announcements on bulletin boards of five Local Community Offices (LCOs) (Centar, Dzepe, Bijela, Bijelo Polje and Tresanica (including its branch office "Donje Selo").

All available Project information and documents will be disclosed to the public at least 7, but preferably 14 days in advance of the meetings.

At the meetings, JPAC will present the project footprint, the expected impacts and planned mitigation measures, as well as receive feedback on the disclosure package from stakeholders.

Participants will be able to present their opinions and remarks with regard to the Project, as well as suggest possible solutions to the issues raised. The meetings will be open to all interested stakeholders, including residents of local communities in the vicinity of the project footprint. NGOs will receive a notification about the meetings by email/phone/post (as available) and will be invited to attend if interested.

The conclusions of the meetings will be agreed during the meetings and recorded. All comments and proposals will be documented and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

In addition, individual consultation meetings for specific issues may be organised at the initiative of the JPAC, the City of Mostar and City of Konjic or by any identified stakeholder groups/individuals.

2) Meetings planned during the design stage:

JPAC will organise consultations with City level authorities and LCOs on all issues of significance for the communities, including but not limited to the issues of planned disposal sites for construction waste, planned new local roads and underpasses/overpasses (considerations of sufficiency, dimensions and safety) with the aim of clearly presenting all planned additional infrastructure, hear the views of local residents in relation to access to their land and make changes, as far as practicable, to accommodate their needs.

3) Meetings planned during the construction phase:

During construction works, JPAC will hold at least one public consultation meetings for each subsection (in Mostar or in Konjic – whichever is closer to the subsection) to present the Project progress and receive feedback regarding the impacts of construction works. The meetings will be attended by the representatives of the Contractor.

Note: These meetings will be announced and arranged in the same manner as foreseen for the meetings planned during the ESIA stage. All comments and proposals will be documented and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

5.5 Consultation and Engagement Objectives and Approaches

A list of identified stakeholders and specific communication requirements are presented in the sections above. Consultation and engagement objectives and approaches are provided in Table 2 below.

Table 2: Consultation and Engagement Objectives and Approaches

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
<p>Project Affected People:</p> <p>Landowners/users will be directly affected by land acquisition.</p> <p>Note: The exact scope of land acquisition and location of affected land plots will be defined in LARPs, which will be developed for four subsections:</p> <ul style="list-style-type: none"> > Konjic (Ovcari) to Prenj Tunnel > Prenj Tunnel itself > Exit of Prenj Tunnel to Mostar North > Konjic Bypass 	<p>Acquisition of private land plots will need to be carried out for the needs of the Project.</p>	<ul style="list-style-type: none"> > Providing timely information on land acquisition activities and responses to questions/grievances. > Developing the future LARPs based on household level consultations and engagement > Presenting the LARF and future LARPs and discussing all land acquisition issues and concerns. 	<ul style="list-style-type: none"> > Targeted consultations and engagement during the development of future LARPs (household interviews, focus group discussions, key informant interviews) > Disclosure and communication as defined in the LARF (disclosure of future LARPs, public meetings).
<p>Local residents and businesses in the vicinity of the Project area</p> <p>Settlements through which the motorway directly passes: Ovcari, Tresanica, Gornje Polje, Polje Bijela, Bijela, Mladeskovici, Podgorani, Humilisani, Potoci and Kutilivac</p> <p>Settlements through which the Konjic Bypass directly passes: Ovcari (same settlement as the start of motorway section), Vrbici, Galjevo, Repovica, Donje Selo and Drecelj</p> <p>Additional settlements (all in Konjic) within the wider study zone (within a zone of 500-600 m from the</p>	<p>Construction and operation/maintenance activities that may cause disturbances to the local population (noise, dust, vibration, access restrictions, increased traffic)</p> <p>Reliability of water supply and water quality, power, sewage and other utilities</p>	<ul style="list-style-type: none"> > Providing timely and accessible information and consultations about risks and disturbances associated with the construction and operational phases. > Providing timely and accessible information on the extent, timing and duration of planned works and any expected disruptions and 	<ul style="list-style-type: none"> > Public consultation meetings, and separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (in the premises of relevant Local Community Offices) during the Project preparation stage

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
footprint) which have a potential to be affected by the Project: Prevlje, Josanica, Glavicine and Dzepe		inconveniences for all utility services.	<ul style="list-style-type: none"> > Consultations with City level authorities and LCOs on all issues of significance for the communities during the Project preparation stage > Public consultations and small group discussions at LCOs during the construction stage > Publishing information on the extent, timing and duration of planned works and any expected disruptions in public utilities on the bulletin boards in LCOs, places of worship, health centres, public service buildings and other community facilities. This will include information on the responsible authorities for each public utility service with contact details (person or persons who can be contacted in the event of disconnections). > Providing timely information to local communities on planned

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
			<p>water supply cuts and deteriorated water quality in case of an accidental pollution or temporary turbidity.</p> <ul style="list-style-type: none"> > Media/press releases > Web sites > Info-panels placed on the construction sites > Community grievance mechanism details (posted on construction sites, places of worship, online, with authorities, at public buildings/facilities in the project area (e.g., health centres, libraries, other public service areas, etc.))
<p>Representatives of religious communities (Islamic Community and Orthodox Rectory Konjic)</p> <p>Visitors of religious and cultural assets, including but not limited to:</p> <ul style="list-style-type: none"> > the mosque Donje Selo (at around 30 m from the viaduct belonging to the Konjic Bypass), > the Orthodox cemetery in the Donje Selo settlement (at around 110 m from the viaduct belonging to the Konjic Bypass), 	<p>Access restrictions to these assets due to their proximity to the planned construction sites, as well as health and safety concerns due to noise, vibrations or dust during construction or operation.</p>	<p>Providing timely and accessible information and consultations about the Project, risks and disturbances associated with the construction and operational phases, timing of any disruptions, and alternative access routes (with maps) during any periods of restricted access.</p> <p>Timely provision of alternative access roads as needed and informing relevant local communities about these options.</p>	<ul style="list-style-type: none"> > Direct communication with religious communities through group or individual meetings (face-to-face or telephone) > Info-panels placed on the construction sites and places of worship > Information on community grievance mechanism posted on mosque,

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
<ul style="list-style-type: none"> > Another Orthodox cemetery in the Mladeskovici settlement (at around 122 m from the motorway route) > Muslim cemetery Kuti in the Kutilivac settlement (at around 170 m from the motorway section) > the Orthodox church "Holy Sunday – Bijela" and the mosque "Bijela" located in the Bijela settlement (at around 415 m and 467 m respectively from the motorway section) 			church, and cemetery entrances, as well as on construction sites
Cities and LCOs: <ul style="list-style-type: none"> > City of Mostar and LCO Bijelo Polje > City of Konjic and LCOs Dzepe, Tresanica, Centar, Bijela 	Concerns regarding: the locations of construction waste disposal sites underpass/overpass sufficiency, dimensions, and safety local road connections and access community health and safety	Providing timely and accessible information and consultations about risks and disturbances associated with the construction and operational phases.	<ul style="list-style-type: none"> > Official correspondence > Public consultation meetings and small group meetings in LCOs during the Project preparation stage, and additional City/LCO meetings in the design stage
Relevant government authorities, ministries and public institutions and companies, including: <ul style="list-style-type: none"> > Federal Ministry of Environment and Tourism, > Federal Ministry for Spatial Planning, > Adriatic Sea Basin District Agency, > Railways FBiH, > Public utility enterprises (water, electricity, telecommunications) 	Issuing permits, consents and opinions in accordance with the local legislation, control of compliance with local legislation, management of the PRTR register. Reliability of water supply and water quality, power, sewage and other utilities. Forest management, conservation, and sustainable use of forest resources.	Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures, including forest management and conservation. Reporting based on national legislation requirements. Timely communication with water utilities regarding water supply in case of any accidental water	As defined by national legislation for formal permitting and approvals processes and through provision of mitigation measures foreseen under ESMP. Consultations with public utility enterprises during the planning stage on how to manage any planned or unplanned disruptions, aimed at reducing and mitigating impacts associated with disruptions to utility services, and further regular communication with these

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
<ul style="list-style-type: none"> > Cultural heritage institutions (Commission to Preserve National Monuments of BiH, Institute for Protection of Monuments of FBiH, Institute for Protection of Cultural – Historical Heritage of Herzegovina-Neretva Canton) > Forest Management Company 'Sumarstvo Prenj' 	Monitoring forest ecosystem health, including biodiversity protection and the management of forestry-related environmental impacts.	<p>source pollution or temporary turbidity</p> <p>Timely communication with other utilities regarding the extent, timing and duration of planned works and any expected disruptions and inconveniences for all utility services.</p> <p>Coordination with forestry authorities to address any environmental impacts, such as deforestation or biodiversity loss, resulting from construction activities.</p>	<p>enterprises during ground disturbance works near public utility installations to reduce the risk of accidental disconnections.</p> <p>Coordination with forestry authorities to ensure mitigation measures for any deforestation, habitat disturbance, or adverse impacts on local biodiversity, in line with environmental protection regulations.</p>
Interested non-governmental organisations (NGOs) listed above in section 4 Identification of Stakeholders, as well as other NGOs as may be identified during the disclosure and consultation period.	<p>Protection of the environment and human health</p> <p>Alignment selection and motorway design</p>	Providing timely and accessible information, communication, and consultations	<ul style="list-style-type: none"> > Public consultation and engagement meetings and individual consultation meetings as necessary (at least annually or more frequently as required) > Direct consultation and engagement on issues of concern > Local media/press releases
JPAC Employees and the Trade Union	Involvement in Project planning and implementation, safe working conditions, fair employment practices and other labour related issues	Providing information about the planned Project activities	<ul style="list-style-type: none"> > JPAC's internal communication channels to organise regular surveys, information disclosure meetings, focus group discussions with various departments

Identified stakeholder	Specific issues or interests	Consultation and engagement objectives	Consultation and engagement methods
			<p>within JPAC involved in Project implementation</p> <p>> Trainings as necessary</p>
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	Health and safety, environmental, labour practices, as well as working conditions during construction	Provision of Project labour policies, code of conduct and work safety and health regulations, environmental protection requirements, information on workers' grievance mechanism	<p>> Information through tender procedure and contracts</p> <p>> Communication via supervising engineers</p> <p>> Toolbox talks at construction sites on relevant occupational health and safety, protection of cultural assets and other topics</p> <p>> Reports on progress of works to be submitted by contractors during construction works</p> <p>> Trainings and inductions before mobilisation, including on the Code of Conduct</p> <p>> Workers' grievance mechanism</p>

5.5.1 Summary of Stakeholder Engagement and Disclosure Requirements

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table 3 below.

Table 3: Summary of Stakeholder Engagement and Disclosure Requirements

No.	Activity	Timing/further details	Responsibility
DURING THE ESIA STAGE			
1	<p>Ensure that the following Project documents are publicised on the websites of JPAC and the City of Mostar, City of Konjic and Municipality of Jablanica:</p> <ul style="list-style-type: none"> > This Stakeholder Engagement Plan (SEP), > Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management Plan (ESMP), > Public Grievance Form and Public Grievance Leaflet, > Non-technical Summary (NTS) of the environmental and social assessment of the Project, > Environmental and Social Action Plan (ESAP), > Biodiversity Management Plan (BMP), > Land Acquisition and Resettlement Framework (LARF) and subsequent Land Acquisition and Resettlement Plans (LARPs) – <i>see item 2 below for LARPs.</i> <p>Print and keep hard copies of documents at premises of JPAC (both Mostar and Sarajevo offices), the City of Mostar, City of Konjic and Municipality of Jablanica.</p>	<p>All available Project information and documents will be disclosed to the public as soon as available, i.e., at least 7, but preferably 14 days prior to the public meetings.</p> <p>The disclosure package will be publicly disclosed on the websites of the JPAC, City of Mostar, City of Konjic, Municipality of Jablanica, EBRD and EIB during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors and will remain publicly available throughout the life of the Project.</p> <p>Information about the availability of the disclosure package to be publicised through local media.</p>	PIU
2	Carry out targeted consultations and engagement with landowners/users will be directly affected by land acquisition during the development of future LARPs	During LARP development	PIU

No.	Activity	Timing/further details	Responsibility
	(household interviews, focus group discussions, key informant interviews).		
3	<p>Organise at least two public consultation meetings, one in Mostar, one in Konjic, during Project preparation (but prior to the start of construction works).</p> <p>Encourage written proposals and comments.</p> <p>Provide timely access to the documents before the meetings (at least 7, but preferably 14 days in advance).</p> <p>Publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.</p>	Stakeholders will be informed about the exact date, time, and venue where a meeting will be held, at least seven, but preferably 14 days in advance, through the websites of the JPAC, the City of Mostar, City of Konjic, Facebook page of JPAC, five LCOs as well as local media sources.	PIU
4	<p>Hold separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (e.g., in the premises of relevant Local Community Offices).</p> <p>Publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.</p>	Stakeholders will be informed about the exact date, time, and venue where a meeting will be held, at least seven, but preferably 14 days in advance, through the LCOs	PIU
5	Organise other individual consultation meetings	As needed or requested by the JPAC, City of Mostar, City of Konjic, Municipality of Jablanica, or by any identified stakeholder groups/individuals	PIU
6	Document all opinions, remarks, and possible solutions with regard to the Project raised by stakeholders during consultation meetings, and address appropriately afterwards.	After engagement activities	PIU
DURING THE DESIGN STAGE			
7	Organise consultations with City level authorities and LCOs on all issues of significance for the communities, including	During the design process	PIU (together with project designers)

No.	Activity	Timing/further details	Responsibility
	<p>but not limited to the issues of planned new local roads and underpass/overpass (considerations of sufficiency, dimensions, and safety) with the aim of clearly presenting all planned additional infrastructure, hear the views of local residents in relation to access to their land and make changes, as far as practicable, to accommodate their needs.</p> <p>Document all opinions, remarks, and possible solutions with regard to the Project raised by stakeholders during these meetings, and address appropriately afterwards. Publish a summary report of all relevant issues raised.</p>		
8	Consult with public utility enterprises and forestry authorities (such as Forest Management Company 'Sumarstvo Prenj') during the planning stage on how to manage any planned or unplanned disruptions, aimed at reducing and mitigating impacts associated with disruptions to utility services and ensuring compliance with forestry practices	During the design process	PIU (together with project designers)
PRIOR TO CONSTRUCTION			
9	Publicise information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the websites of JPAC, City of Mostar and City of Konjic, and bulletin boards in five LCOs, places of worship, health centres, public service buildings and other community facilities.	Two weeks prior to the start of construction works	PIU
10	Direct communication with religious communities through group or individual meetings (face-to-face or telephone)	Prior to start of construction	PIU
DURING CONSTRUCTION			
11	Hold at least one public consultation meeting for each subsection (in Mostar or in Konjic – whichever is closer to the subsection) to present the Project progress and receive feedback regarding the impacts of construction works.	During construction works	PIU (together with Contractor)

No.	Activity	Timing/further details	Responsibility
	Announce and arrange the meetings in the same manner as foreseen for the meetings planned during the ESIA stage.		
12	Providing timely information to local communities on planned water supply cuts and deteriorated water quality in case of an accidental pollution or temporary turbidity	During construction works	PIU (together with Contractor)
13	Ensure that community grievance mechanism details are posted on construction sites, places of worship, online, with authorities, at public buildings/facilities in the project area	During construction works	PIU (together with Contractor)
14	Regularly communicate with public utility enterprises and relevant forestry authorities (e.g., Forest Management Company 'Sumarstvo Prenj') during ground disturbance works near public utility installations to reduce the risk of accidental disconnections and ensure that forested areas are properly managed.	During construction works	PIU (together with Contractor)
ONGOING			
15	Publicise information about Project progress on JPAC website.	Periodically	PIU

6 Grievance Management

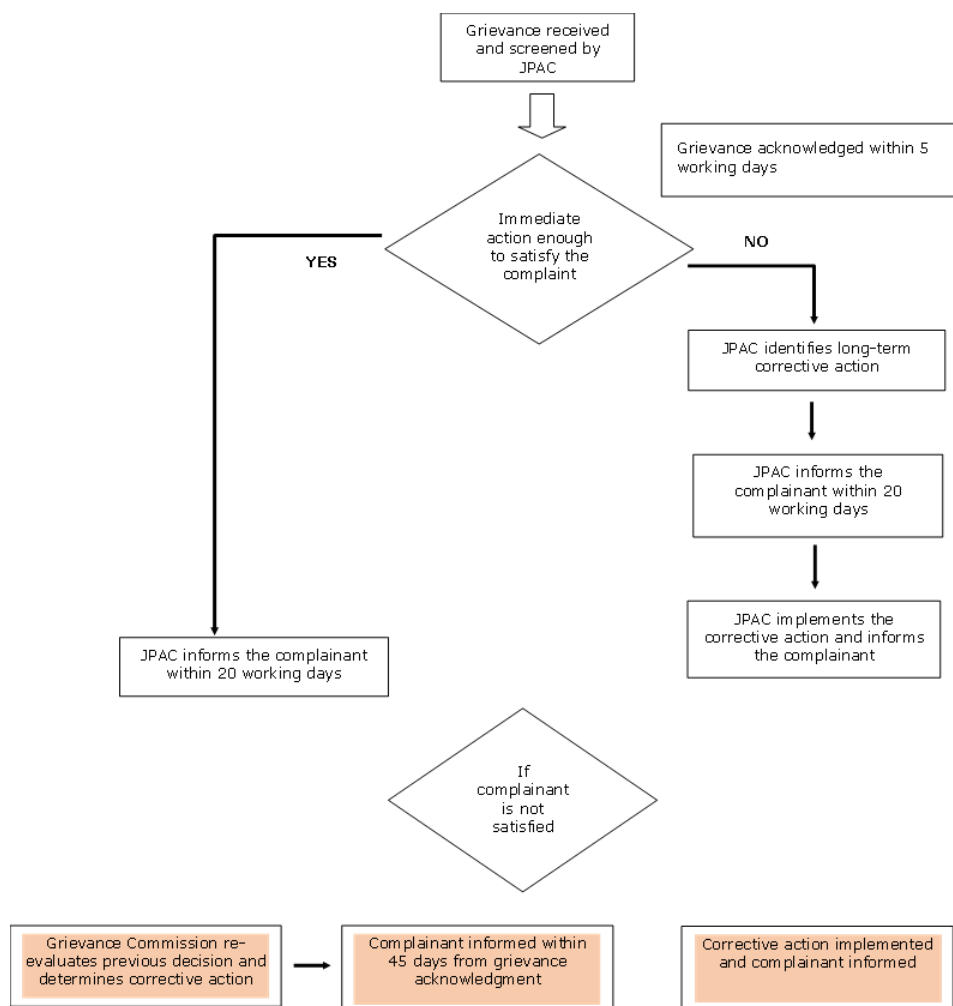
Overview

JPAC is striving to ensure that the construction of the section Konjic (Ovcari)-Prenj Tunnel-Mostar North will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. JPAC understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating, and addressing grievances from affected communities.

JPAC will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. Both JPAC and the Contractors will accept complaints associated with the Project and complainants have the right to request that their name be kept confidential. At all times, complainants may seek other legal remedies in accordance with the legal framework of FBiH, including formal judicial appeal. JPAC will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. JPAC will also report regularly to the public on the Grievance Mechanism implementation, while protecting the privacy of individuals (please see *Chapter 7 - Monitoring and Reporting*).

This chapter includes the following supporting appendices: Project Grievance Form (given in Appendix 1), Public Grievance Leaflet (given in Appendix 2), template of the Grievance Registry (given in Appendix 3), and a detailed flowchart for processing grievances (given in Appendix 4).

The following sections of this chapter elaborate the grievance procedure and steps. A summarised version of the mentioned flowchart for processing grievances is shown below for overview purposes:



Note: A separate grievance mechanism is available for workers (as part of the Construction Labour and Employment Plan, as specified in the Project ESMP).

Grievance Form and Leaflet

The Public Grievance Form (Appendix 1) will be disclosed in local language (Bosnian/Croatian/Serbian) on JPAC's website. In addition, a **Public Grievance Leaflet (Appendix 2)** will be disclosed on:

- > the websites of JPAC, City of Mostar, City of Konjic, and Municipality of Jablanica,
- > in the offices of the five LCOs) four in Konjic (Centar, Dzepi, Bijela and Tresanica) and one in Mostar (Bijelo Polje),
- > on the construction site before the commencement of construction works and maintained throughout the entire construction phase.

Submitting Grievances

Any **concerns can be brought to the attention of JPAC** verbally (personally or by telephone) or in writing by filling in the Public Grievance Form (by personal delivery, post or e-mail to the address/number given below), without any costs

incurred to the complainant. Grievances **may also be submitted anonymously** or without the use of the form if preferred.

After the start of construction works, **the Grievance Form may also be submitted directly to the Contractor** for construction works, which will forward any such received grievances to JPAC without delay (within 24 hours) to allow JPAC to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). The Contractor is obliged to hand out the Public Grievance Form, explain the grievance mechanism to the concerned citizen(s) and forward the filled-in Grievance Form to JPAC. **The Public Grievance Leaflet** concerning the grievance mechanism will be available in local language (Bosnian/Croatian/Serbian) at the construction site at all times, whether the construction site is closed or open. The leaflet will be plasticised and hung on the construction site information board to be publicly available at all times.

Recording and Acknowledging Grievances

JPAC will establish a Grievance Registry and will inform all stakeholders of the grievance mechanism by communicating the availability of this Registry, its function, the contact persons and the procedures for submitting a complaint in the affected areas. The form of the Grievance Registry is provided in Appendix 3 of this SEP and the detailed flowchart for processing grievances is enclosed in **Appendix 4**.

All grievances will be recorded in the Grievance Registry and assigned a number and acknowledged **within 5 working days**. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- > description of grievance,
- > details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project),
- > risk level to health, safety or environment (*please see the table below*),
- > date of receipt of grievance and when acknowledgement returned to the complainant,
- > description of actions taken (investigation, corrective measures, preventive measures) with time needed for each action, and
- > date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution.

Classification of Grievances

JPAC will classify the received grievances as low, medium or high risk to determine its actions in processing and responding to the grievance as follows:

Classification	Risk level	Details and response
Low	None or low	The grievance may refer to some minor construction or disruption issue or may not be related to the Project. It may also be a comment,

Classification	Risk level	Details and response
		feedback or a request instead of a grievance (in which case it is only necessary to communicate with the complainant and record it in the separate Stakeholder Engagement Registry). The PIU will acknowledge the grievance within 5 working days and conduct an investigation if required. The PIU will then document its findings and provide a resolution response within 20 working days of acknowledgment.
Medium	Possible risk and likely a one-off event	The PIU will acknowledge the grievance within 5 working days and conduct an investigation. It will provide a resolution response within 20 working days of acknowledgment. The corrective action is likely to be straight forward and will not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	<p>The PIU will acknowledge the grievance within 5 working days and will organise an investigation. Such grievances will require urgent consideration. The PIU will provide a resolution response within 20 days of acknowledgement. If more time is needed to complete the investigation, this will be communicated to the complainant within 20 days of acknowledgement.</p> <p>If necessary, the response will include a press release. The corrective action may be complex or sensitive and can have substantial cost implications.</p>

Assisting Complainants

If the grievance is vague and not clear enough, JPAC will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by JPAC, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

First-Tier Grievance Resolution

JPAC will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If JPAC is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/justification on why the issue was not addressed. The response will also contain an explanation on how the person/organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

The complainant will be informed about the proposed corrective action and the follow-up of the corrective action within 20 working days upon the acknowledgement of grievance. If JPAC is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified,

particularly for grievances classified as high risk where investigation may require more time, but in any case this will be communicated to the complainant within 20 days of acknowledgement. Preventive actions will be identified where applicable and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, JPAC will validate complainant satisfaction through providing a grievance close-out form for the resolved grievance to be signed by the complainant and JPAC to attest to their mutual satisfaction. JPAC will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

Second-Tier Grievance Resolution

If the complainant is not satisfied with the implemented corrective action or justification on why a corrective action is not required, the complaint will be directed to the ad-hoc Grievance Commission which will comprise: one representative of JPAC, one representative of the relevant Local Community Office, and one representative of a local independent NGO.

The Commission will re-evaluate the proposed or implemented corrective action or the justification on why an action is not required, and reconsider alternatives to address the complaint in a satisfactory manner. The complainant will be informed about the proposed alternative corrective action within 45 days upon the acknowledgement of grievance. Complainant satisfaction will be validated through providing a grievance close-out form for the resolved grievance to be signed by the complainant and the Grievance Commission.

If the complainant is still not satisfied with the solution, he/she can seek to use other remedies, including judicial redress in accordance with the national legislation.

FBiH

Contact Information

Contact information for enquiries and grievances:

Motorways of the Federation of Bosnia and Herzegovina

Attn: Grievance mechanism contact person

Address: Adema Buća 20, 88000 Mostar

Hamdije Kreševljakovića 19, 71000 Sarajevo

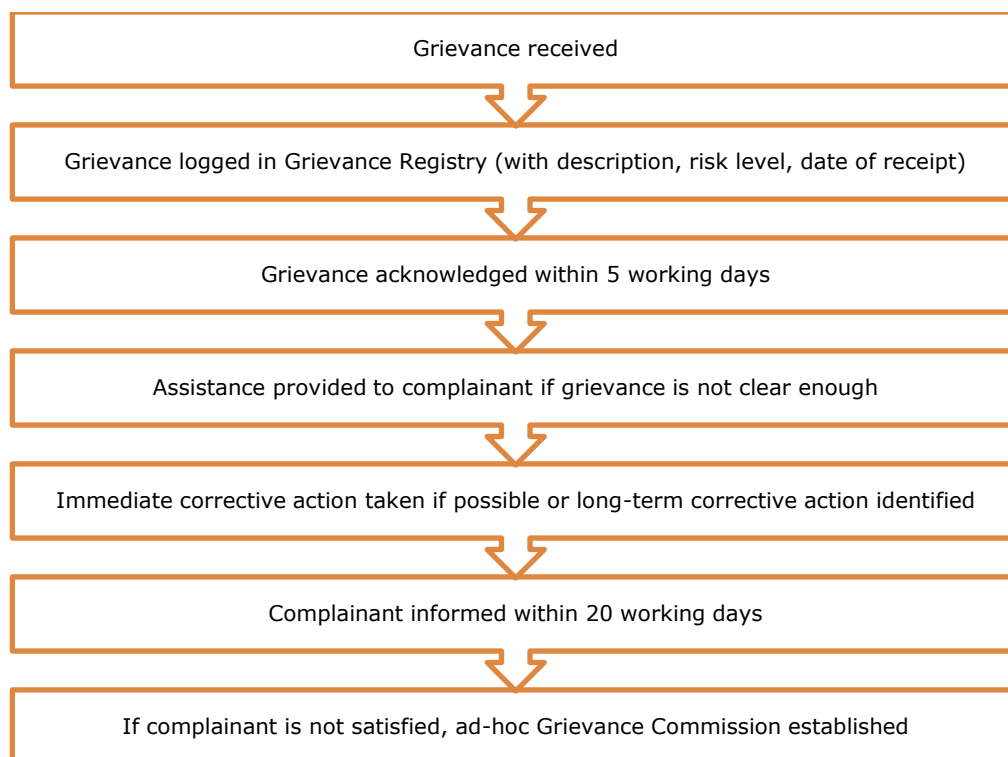
Tel: +387 36 512 300

Fax: +87 36 512 301

E-mail: prituzbe@jpautoceste.ba

Note: This contact information refers generally to the entire Project but land related grievances will be managed separately with specific contact details for each LARP to be defined in the LARPs.

Summary of Grievance Management Process



EBRD's Independent Project Accountability Mechanism

In addition to project level grievance mechanism managed by JPAC, the EBRD's Independent Project Accountability Mechanism¹³ (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

¹³ Information about IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

7 Monitoring and Reporting

JPAC will monitor the stakeholder engagement process to evaluate its success in terms of the effectiveness of the communication process and managing stakeholder relations, based on the following indicators:

1. *Engagement effectiveness*: the number of stakeholders engaged, the level of engagement and level of stakeholders' satisfaction with the engagement process
2. *Grievance resolution*: the number of grievances submitted, the time taken to resolve or respond to them and the level of stakeholders' satisfaction

The results of monitoring will be included in Monitoring Reports to be prepared by the PIU. These reports will be disclosed online on its website without any confidential information. The first report will be produced three months after the beginning of the Project, and will continue on a quarterly basis during construction works and on an annual basis during operation. The reports will include the following information:

- > Place and time of the held consultation meetings and other types of engagement activities, with information on the number of participants;
- > Issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the PIU;
- > Number and types of grievances raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism, including information on complainants' satisfaction with the resolution.

All stakeholder engagement activities will be recorded in the Stakeholder Engagement Registry (Appendix 5 of this SEP) by the PIU.

In addition, the PIU will submit Annual Environmental and Social Reports to EBRD and EIB summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the grievance mechanism.

The PIU will be responsible for managing and monitoring the Project-level grievance mechanism as well as monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD and EIB.

Appendix 1: Public Grievance Form

Reference Number	<i>(to be completed by the Project)</i>	
Full name (optional) <input type="checkbox"/> I wish to raise my grievance anonymously. <input type="checkbox"/> I request that you do not disclose my identity without my consent.		
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail	
Preferred language of communication	<input type="checkbox"/> Bosnian / Serbian / Croatian <input type="checkbox"/> English (if possible)	
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident / Grievance		
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen?		

Signature: _____
 Date: _____

Please return this form to:
 Motorways of the Federation of Bosnia and Herzegovina
 Attn: Grievance mechanism contact person
 Address: Adema Buća 20, 88000 Mostar
 Hamdije Kreševljakovića 19, 71000 Sarajevo
 Tel: +387 36 512 300
 Fax: +87 36 512 301
 E-mail: prituzbe@jpautoceste.ba

Appendix 2: Text for the Public Grievance Leaflet

JPAC is striving to ensure that the construction of the section Konjic (Ovcari)-Prenj Tunnel-Mostar North will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities. A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating and addressing grievances from affected communities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that Project activities are negatively affecting them, their community or their local environment. Examples of grievances could include, but are not limited to:

- > Increased noise, access issues or other nuisances during construction or operation;
- > Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- > Concerns about the environment;
- > Practices that endanger the health, safety and security of members of the community affected by the Project;
- > Complaints regarding the land acquisition process or entitlements;
- > Complaints regarding damage to any private assets during construction works;
- > Inadequate implementation of the Project's Stakeholder Engagement Plan by JPAC.

How can I file a grievance?

Anyone can lodge a grievance to JPAC (contact details are provided below) or the contractor (which will forward the grievance to JPAC within 24 hours) free of charge in the following ways:

- a. verbally (in person or by phone);
- b. in writing by filling in the attached Project Grievance Form (or in a different form if you wish), and filing such grievance (by hand delivery, mail, fax or e-mail).

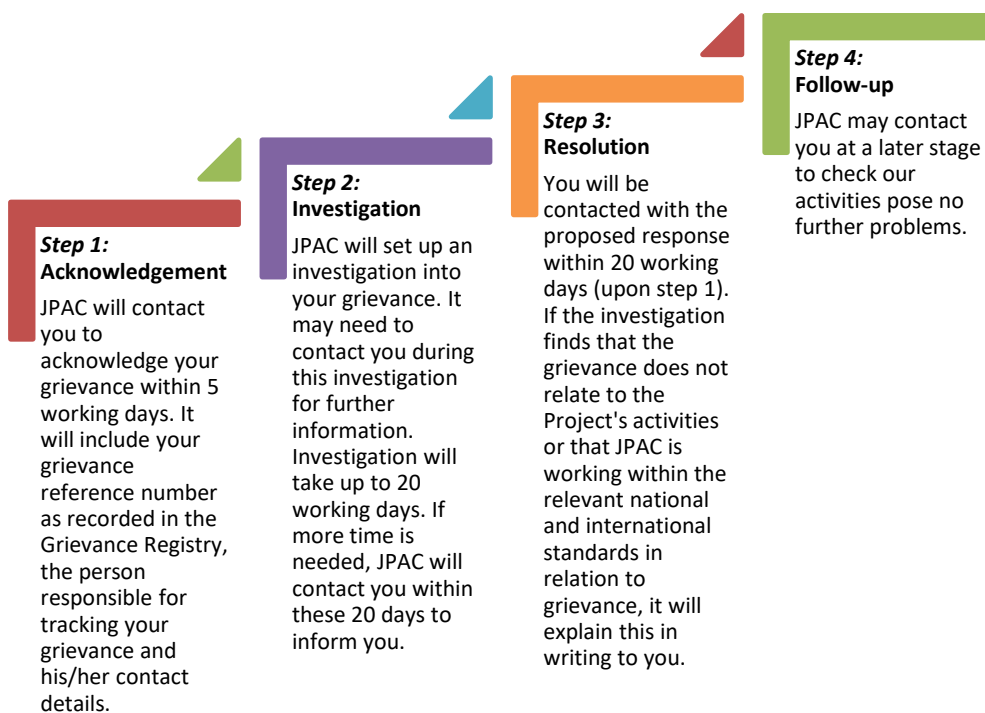
Contact details:

Motorways of the Federation of Bosnia and Herzegovina
Attn: Grievance mechanism contact person
Address: Adema Buća 20, 88000 Mostar
Hamdije Kreševljakovića 19, 71000 Sarajevo
Tel: +387 36 512 300
Fax: +87 36 512 301
E-mail: prituzbe@jpautoceste.ba

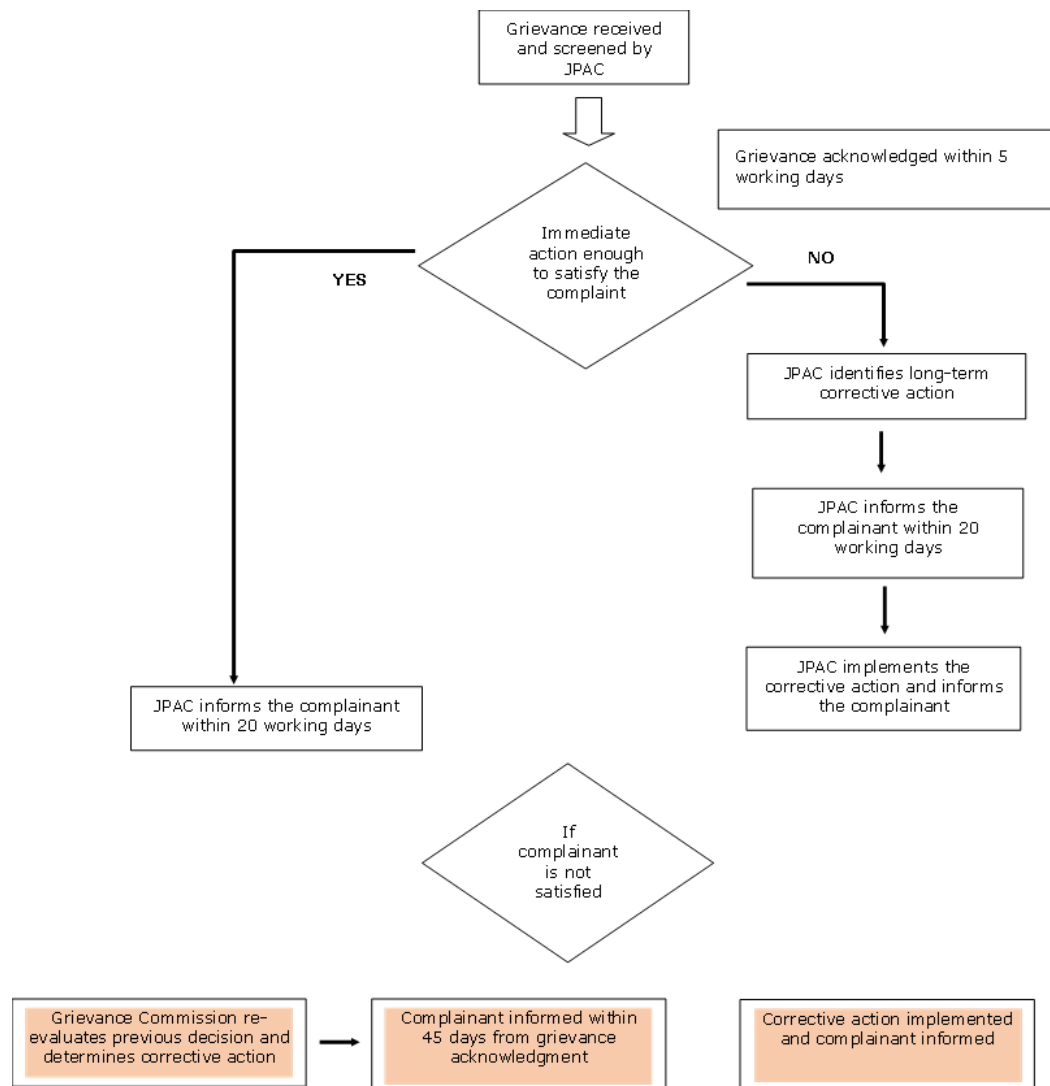
Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, JPAC will ensure that your name and contact details are not disclosed without your consent and only the persons directly involved in the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

How will JPAC process my grievance?

JPAC will take the following steps to deal with your grievance:



[The entire grievance management process is](#) explained in detail in the Stakeholder Engagement Plan for this Project publicised by JPAC. A summarised version of the steps is provided below:

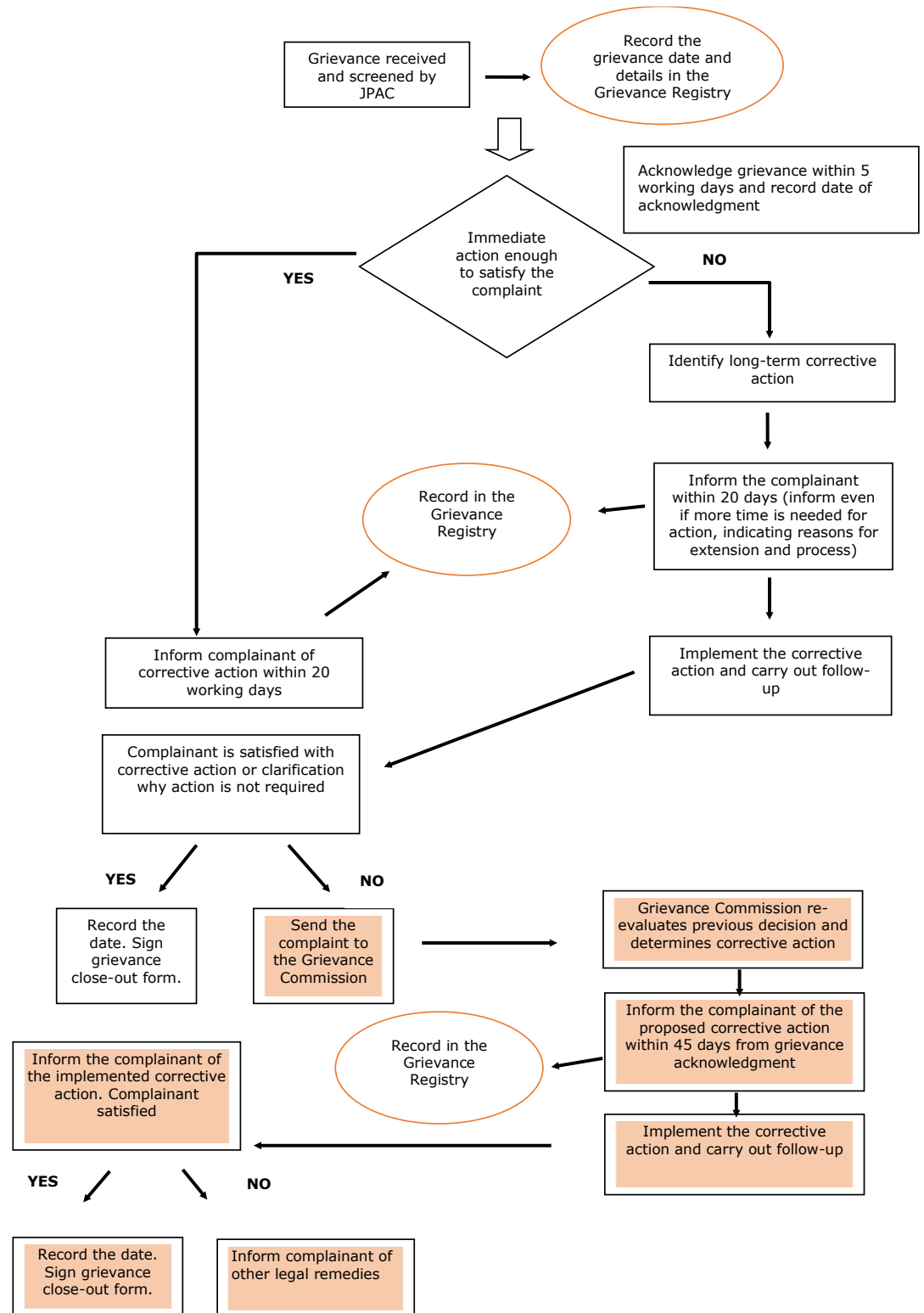


Appendix 3: Project Grievance Registry – Template

Note: Any personal data will be processed in line with the Law on Personal Data Protection (Official Gazette 49/06, 76/11 and 89/11).

	Name of complainant	Sex of complainant	Contact information	Date received	Date acknowledged	Grievance description	Risk level to health, safety or environment	Proposed solution	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/notes
1.	<i>Enter name or 'anonymous'</i>												
2.													
3.													
4.													
5.													

Appendix 4: Flowchart for Processing Grievances



Appendix 5: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with the Law on Personal Data Protection (Official Gazette 49/06, 76/11 and 89/11).

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	<i>(E.g., NGO, affected resident, cultural heritage institute...)</i>	<i>(E.g., official meeting, presentation, informal meeting...)</i>				
2.						
3.						