

COMPLAINTS MECHANISM

SG/E/2025/05

**CORRIDOR VC
MEDAKOVO – POPRIKUSE
(BOSNIA AND HERZEGOVINA)**

INITIAL ASSESSMENT REPORT

3 NOVEMBER 2025



SG/E/2025/05

CORRIDOR Vc MEDAKOVO–POPRIKUSE
(BOSNIA and HERZEGOVINA)
Initial Assessment Report

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This report is based on the information available to the EIB Group Complaints Mechanism Division up to 26 September 2025.

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

The EIB Group Complaints Mechanism

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

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

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

The Initial Assessment Report

The initial assessment generally aims to¹:

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

¹ As outlined in §§ 2.2.1 to 2.2.7 of the EIB Group Complaints Mechanism procedures, available at: [EIB Group Complaints Mechanism Procedures dated November 2018](#).

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EXECUTIVE SUMMARY

This report relates to a complaint regarding the Corridor Vc Medakovo-Poprikuse project in Bosnia and Herzegovina. The complaint was submitted by a family owning land plots and a house near the construction of the project. The complainants and JPAC agreed to engage in a collaborative dispute resolution process, facilitated by the Complaints Mechanism, to resolve the complaint issues. Consequently, the Complaints Mechanism proposes to proceed with a collaborative dispute resolution process.

1 PROJECT

- 1.1 On 9 September 2020, the EIB Board of Directors approved the financing of the Corridor Vc Medakovo-Poprikuse project (the **project**) in Bosnia and Herzegovina (BiH) for an amount of up to €340 million.² The finance contract was signed by Bosnia and Herzegovina on 28 December 2020. The project is being carried out by the state-owned motorway development company Javno Preduzece Autoceste FBiH d.o.o. (**JPAC**).
- 1.2 The project consists of the construction of a 35 km new motorway section on Corridor Vc in northern BiH, extending from Medakovo to Poprikuse via Ozimica. It will form part of the Pan-European Motorway Corridor Vc, linking Hungary and eastern Croatia to BiH and the Adriatic Sea.

2 COMPLAINT

- 2.1 On 18 April 2025, the Complaints Mechanism received a complaint from a legal advisor on behalf of a family that owns two plots of land and a house near the construction of the motorway (the **complainants**). The complaint raises concerns about the negative environmental and social impacts of the project.
- 2.2 The complainants allege that they were living in their family house, surrounded by other family members' and neighbours' houses. Few years ago, all the immediate neighbours were able to request and obtain full expropriation of their lands in connection with the realisation of the project. The complainants' land, although located closer to the motorway than some of these neighbours, was not expropriated.
- 2.3 According to the complainants, since the construction of the motorway started, the land surrounding their house, including the plot of land they used to cultivate crops, is too dusty and rocky to be used.
- 2.4 They further allege that the construction of the motorway disconnected the house from the sewage system and destroyed the pipes. Consequently, the wastewater seeps into the ground openly and causes unpleasant smells.
- 2.5 The complainants also raise concerns regarding safe access to their house. Since construction of the motorway began, they must go through the construction site to access their house. According to the complainants, this poses a security threat, as the construction site is regularly traversed by heavy machinery and trucks. The complainants also worry that in case of a medical emergency, an ambulance may have difficulty reaching their house. Additionally, they have not been informed how they would be able to access their house once the motorway becomes functional.

² More information on the project is available at: [CORRIDOR VC MEDAKOVO - POPRIKUSE](#).

- 2.6 The complainants are particularly concerned about the physical and social isolation of the elderly family member living in the house. The house used to be surrounded by family and neighbours. Currently, the neighbours are either expropriated or are on the other side of the motorway. To visit them, one must cross the construction site or take a lengthy detour.
- 2.7 The complainants also raise concerns about the risk of flooding. This is because the motorway - which is raised on an embankment - has been built between their house and the stream where rainwater would flow before the construction.
- 2.8 Additionally, the complainants allege that regulations and standards regarding safe destruction of houses were not respected when their neighbours' houses were demolished. They are concerned that the pile of rubble that remains from the destruction in front of their house is not safe. According to the complainants, looters come to take items left in the rubble, posing safety concerns to the complainants and the members of their family.

3 REGULATORY FRAMEWORK

- 3.1 The work of the Complaints Mechanism is governed by the EIB Group Complaints Mechanism Policy³ and Procedures.⁴ For admissible complaints regarding environmental and social impacts of projects financed by the EIB, the policy and procedures require the Complaints Mechanism to conduct an initial assessment of the complaint. The main objectives of the initial assessment are to clarify the concerns raised by the complainants and to determine if further work by the Complaints Mechanism is necessary and/or possible in order to address the allegation(s) or resolve the issue(s) raised by the complainants.⁵ Further work may include a compliance review or a collaborative dispute resolution process. The Complaints Mechanism should identify the relevant stakeholders who are to be involved in a possible collaborative dispute resolution process and should understand their views and willingness to resolve the issues.⁶ This report contains the results of the Complaints Mechanism's initial assessment.
- 3.2 The regulatory framework includes the EIB's policies, procedures and standards relevant to projects, in particular Environmental and Social Standard 1 "Assessment and Management of Environmental and Social Impacts and Risks", Environmental and Social Standard 6 "Involuntary Resettlement", Environmental and Social Standard 7 "Rights and Interests of Vulnerable Groups", Environmental and Social Standard 9 "Occupational and Public Health, Safety and Security" and Environmental and Social Standard 10 "Stakeholder Engagement",⁷ as well as applicable national law.

4 INITIAL ASSESSMENT

- 4.1 During the initial assessment, the Complaints Mechanism: (i) had an initial meeting with the relevant EIB Services on 12 June 2025, (ii) reviewed documents, and (iii) held separate online and in-person meetings with representatives of JPAC, the complainants and their advisor, as well as an in-person joint meeting.⁸
- 4.2 During the initial assessment, the complainants expressed that they would like to be expropriated. They noted that on several occasions, they reached out to JPAC to alert them of

³ Available at: [EIB Group Complaints Mechanism Policy](#).

⁴ Available at: [EIB Group Complaints Mechanism Procedures](#).

⁵ For more information about the objective of the initial assessment, see page iii.

⁶ § 2.2.5 of the procedures.

⁷ [Environmental and Social Standards \(2018\)](#) (the 2018 version of the Environmental and Social Standards is applicable here, as the finance contract was signed before the current version of the Standards (2022) was published).

⁸ § 2.2.2 of the Procedures.

the situation and request a resolution of their issues, but had not received any response. They expressed interest in participating in a collaborative dispute resolution process with JPAC, facilitated by the Complaints Mechanism, to discuss and resolve the complaint issues.

- 4.3 In conversations with the Complaints Mechanism, JPAC indicated that it was aware of the complainants' situation and was working on solutions to mitigate the impacts. However, it acknowledged that the complainants had not yet been informed about these efforts. JPAC indicated that it was taking steps to improve its engagement with stakeholders. It expressed interest in participating in a collaborative dispute resolution process with the complainants, facilitated by the Complaints Mechanism, to discuss and resolve the complaint issues.

5 WAY FORWARD

- 5.1 Following the initial assessment, the Complaints Mechanism proposes to proceed with a collaborative dispute resolution process considering the willingness of the complainants and JPAC to engage in a dialogue to solve the issues raised. A collaborative dispute resolution process is forward-looking in nature and seeks to come to mutually accepted and sustainable solutions. The Complaints Mechanism will coordinate the preparation and implementation of this process with the parties.⁹

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⁹ According to the policy, in the event the Complaints Mechanism facilitates a collaborative dispute resolution process, the time limits for processing the complaint may be extended in consultation with the complainant in order to allow for comprehensive engagement of the parties and manage legitimate expectations (See § 4.4.4)