



# **Guide to Grievance Mechanism by the standards of International Financial Institutions**

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So far 102 km of the Corridor Vc has been constructed and put in use. The constructed sections are: Zenica South – Kakanj , Kakanj – Sarajevo North, Sarajevo North – Sarajevo West, Sarajevo West – Tarčin, Zvirovići – Bijača (from the Međugorje interchange to the crossing border Bijača) and Svilaj - Odžak. These sections were financed from the loan funds provided by European Investment Bank (EIB) and European Bank for Reconstruction and Development (EBRD), except for the Kakanj – Sarajevo North section which was financed from the budget of the FBiH.

Table 1 Status of the sections that are still not constructed

No	Section	Length	Status
1	TUNNEL PUTNIKOVO BRDO 2 - MEDAKOVO	8.50	Preparation of tender documents
2	MEDAKOVO - OZIMICA	22.00	Planned
3	OZIMICA - POPRIKUŠE	12.90	Planned
4	POPRIKUŠE - NEMILA	5.50	Procurement in progress
5	NEMILA - VRANDUK	5.67	Procurement in progress
6	VRANDUK - PONIRAK	5.30	Under construction
7	PONIRAK - VRACA TUNEL ZENICA	2.65	Under construction
8	TUNNEL ZENICA - (ZENICA NORTH) - DONJA GRAČANICA	3.90	Under construction
9	DONJA GRAČANICA - KLOPČE	5.78	Under construction
10	TARČIN - IVAN LOT 1 TARČIN – ENT. TO TUNNEL IVAN	4.90	Procurement in progress
11	TARČIN - IVAN LOT 2 TUNNEL IVAN	2.00	Under construction
12	IVAN - OVČARI	11.40	Planned
13	OVČARI - KONJIC – TUNNEL PRENJ	10.00	Planned
14	TUNNEL PRENJ	12.00	Preparation of tender documents
15	TUNNEL PRENJ (SALAKOVAC) - MOSTAR NORTH	13.50	Planned
16	MOSTAR NORTH - MOSTAR SOUTH	15.40	Preparation of tender documents
17	MOSTAR SOUTH – TUNNEL KVANJ	9.20	Planned
18	TUNNEL KVANJ - BUNA	5.25	Procurement in progress
19	BUNA - POČITELJ	7.20	Under construction
20	POČITELJ - ZVIROVIĆI LOT 1	10.10	Under construction
21	POČITELJ - ZVIROVIĆI LOT 2	0.98	Under construction

**LEGEND:**

<b>UNDER CONSTRUCTION</b>	<b>37.91 km</b>
<b>PROCUREMENT IN PROGRESS</b>	<b>21.32 km</b>
<b>PREPARATION OF TENDER DOCUMENTS</b>	<b>35.90 km</b>
<b>PLANNED – DESIGN PREPARATION</b>	<b>79.00 km</b>
<b>TOTAL</b>	<b>174.13 km</b>

The above mentioned sections will be financed potentially with loan funds from international financial institutions (IFIs) such as EIB, EBRD, OFID and from commercial banks.

Most of the motorway sections were financed or will potentially be financed from the loan arrangements with IFIs, so this obliges JPAC to respect not only national legislation but also policies and standards of IFIs that are guided by the political objectives of EU and their principles of sustainable development, involvement of the public and taking responsibility. The implementation of these objectives and principles is carried out and monitored through the tools set out in the EBRD's Environmental and Social Policy and the EIB's Environmental and Social Standards, who share common objectives, namely to promote sustainable and inclusive growth while preserving natural and social environment through an interdisciplinary approach. The set of documents prepared for this purpose for each project financed by the EIB or the EBRD contains the following: Stakeholder Engagement Plan (SEP), Environmental and Social Action Plan (ESAP) and the Resettlement Action Plan (RAP). One of the basic tools prescribed in these documents that guarantees the implementation of the principles of sustainable development, public involvement and accountability is the Grievance Mechanism.

In addition to the institutionally available ordinary and extraordinary legal frameworks and existing institutional channels, which also protect the interests of stakeholders, JP Autoceste as client in accordance with the mentioned regulations and rules of project financiers (EIB and EBRD) must establish a formal procedure or process to manage grievances of workers and local communities<sup>1</sup>.

What is a grievance?

According to the IFC definition a grievance can be defined as “a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company’s operations, and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or to a complaint may be in the specific approaches and the amount of time needed to resolve it. The term “grievance” implies that there may be a problem. In practice, however, the nature of feedback that communities may want to bring to a company’s attention will vary, since communities often find it appropriate to use the same channels to communicate not only grievances but also questions, requests for information, and suggestions.”<sup>2</sup>

So, grievance mechanism may serve as a regular channel of communication with affected communities, where affected parties may comment on what they think the company is doing well. But however, companies should be aware that “unanswered questions or ignored requests for information have the potential to become problems and should, therefore, be addressed promptly.”<sup>2</sup>

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<sup>1</sup> EBRD Grievance Management – Guidance Note, 3 Key principles

<sup>2</sup> IFC Good Practice Note – Addressing Grievances from Project-Affected Communities, Page 4

### Why a separate grievance mechanism?

It is important for every organization to resolve grievances effectively and in a timely manner, as this ensures a good relationship with all stakeholders. In the context of the project, grievance management is an integral part of a sound stakeholder involvement strategy that is necessary for the successful execution of the project<sup>3</sup>. Establishing a separate grievance mechanism despite the existence of an appropriate legislative system is necessary because legal mechanisms are usually clogged and slow, and can generate high costs that are beyond the financial capabilities of ordinary citizens. The existence of a separate grievance mechanism helps to address the concerns that local communities may have in a timely manner before problems escalate out of control. This mechanism must be free of charge, and serve to inform affected communities about project-related activities, act preventive and address community concerns, reduce risks and help the wider process of improving positive social change<sup>4</sup>. The EBRD's Environmental and Social Policy, i.e. Performance Requirement 10, stipulates that all projects should establish a formal procedure or process for resolving stakeholder complaints, respecting the following principles<sup>5</sup>:

1. Assign a responsible person, team or function to organise the resolution of grievances;
2. Define timeframes for acknowledgement of the receipt of complaints and subsequent resolution;
3. Practical arrangements for maintaining confidentiality, reviewing and resolving grievances, including resources and organizational arrangements;
4. Information on the grievance mechanism must be readily retrievable from a company's web site, project information in hard copy must be available at project locations, and/or from company representatives.

In the case of large development projects, grievance mechanisms should be established from the start of the environmental impact assessment and throughout the construction period, until the closure of project financing, and sometimes the Bank may require the mechanism to remain active after project closure. If the projects will result in land acquisition, it is very important that the mechanism is established when compiling the census and asset inventory of the affected land area, because it is very likely that at this stage there will be many concerns and complaints, and they should be processed appropriately and promptly as described earlier in the text. Managing and resolving complaints is entirely the responsibility of the bank's client, which also applies to situations where the project involves a third party such as the contractor. In these cases, even when the complaint is transferred to a third party for resolution, it is important to understand that the responsibility for resolving the complaint remains with the bank's client<sup>6</sup>.

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<sup>3</sup> EBRD Grievance Management – Guidance Note, 2 Why a specific grievance mechanism

<sup>4</sup> Grievance Mechanism is defined in the following documents: Environmental and Social Standards of EIB; ESS6 – Involuntary Resettlement; Art. 53. ESS10 – Stakeholder Engagement ;Art. 45.

EBRD Performance Requirement 5: Land Acquisition, Involuntary Resettlement and Economic Displacement; Art. 21. Performance Requirement 10: Information Disclosure and Stakeholder Engagement; Art. 28

<sup>5</sup> EBRD Grievance Management – Guidance Note, 3 Key principles

<sup>6</sup> EBRD Grievance Management – Guidance Note, 3.4 Responsibilites

In accordance with the EBRD Environmental and Social Policy (2019), i.e. the first key principle of establishing a grievance mechanism, The grievance mechanism procedure will be conducted by the Department for Study Documentation, Social and Environmental Policy within JP Autoceste, which will be represented by the responsible / contact person for the grievance mechanism.<sup>7</sup>

The responsible person/contact person for the grievance mechanism will act both as a contact person for providing information at the level of the motorway construction project and as a contact person for the grievance mechanism, which will apply to all project activities. Will be responsible for receiving and responding to inquiries from the following two stakeholder groups:

- a) Persons directly affected by the project including the impact of land acquisition; and
- b) All other stakeholders interested in the project and/or can influence the project in the directly affected area and area of influence.

Any person or organization has the right to submit grievance. The use of this mechanism must not at any time prevent the complainant from addressing his/her grievance to the national legal system or through another available mechanism. Nor conversely, that resolving a grievance through a legal or other mechanism (such as the Bank's Ombudsman or PAM (Project Accountability Mechanism)) prevents friendly negotiations, arbitration, or mediation<sup>8</sup>.

JP Autoceste will ensure that project affected persons are fully informed about the grievance mechanism by explaining: the role and existence of the grievance mechanism, the availability of a central register for recording inquiries and feedback, their functions, contact persons and procedures on how to contact the contact person for grievance mechanism in the affected area. According to the IFC "developing safe and effective COVID-19 stakeholder engagement and grievance management is an important part of maintaining a proactive communication process and providing communities with information in a timely manner. The engagement processes should be conducted through safe but effective channels, while adhering to the health directives issued by applicable national and local authorities."<sup>9</sup> Grievance information will be readily available to potentially affected communities and other stakeholders by being published<sup>10</sup>:

- In brochures that will be constantly distributed to affected communities,
- On the bulletin board and website of the affected municipalities
- Online communication channels (digital platforms, social media, messaging apps, company website [www.jpautoceste.ba](http://www.jpautoceste.ba), online community forums)

As a result of mandated social distancing, and in some cases restrictions of movement and large gatherings, we have been required to limit activities to those who ensure safe environment. In the light of the safe and effective stakeholder and grievance management, our company is working on establishing new and safe communication channels such as encrypted apps.

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<sup>7</sup> EBRD Grievance Management – Guidance Note, 1 EBRD'S Requirements

<sup>8</sup> EBRD Grievance Management – Guidance Note, 3.6 – Relationship with other complaint or Grievance mechanisms

<sup>9</sup> IFC Interim Advice for Clients on the safe stakeholder engagement in the context of Covid -19 – Page 2

<sup>10</sup> Environmental and Social Standards of EIB: ESS6 – Involuntary Resettlement, Art. 53; ESS 10 – Stakeholder Engagement, Art. 46



## 2. TASKS OF THE RESPONSIBLE/CONTACT PERSON FOR GRIEVANCE MECHANISM

### 2.1 The purpose of grievance mechanism

The main goal of the grievance mechanism establishment, and of designating a contact person is to make sure that the company JP Autoceste is aware and adequately responds to all concerns of stakeholders. It is designed to encourage all employees, stakeholders and contractors to successfully and efficiently manage complaints at the level of the project - motorway construction on the Corridor Vc.

It will act through the cooperation of JP Autoceste and the municipalities affected by the project, consider the grievances of persons related to project activities in the affected municipalities, give recommendations for taking corrective measures to resolve grievances or reduce their impact.

JP Autoceste will make sure that it:

- Addresses grievances in accordance with the EBRD's Environmental and Social Policy and the EIB's Environmental and Social Standards, paying attention to confidentiality and legislation;
- Evaluates each complaint objectively and fully investigates all issues;
- Removes all impacts, mitigates the causes of the problem and takes all necessary actions to eliminate it;
- Continuously informs stakeholders about the progress and outcomes of the grievance management and resolution process;
- Develops training and implements procedures to ensure that all employees and contractors of JP Autoceste respect the principles of this policy;
- Complies with established reporting requirements related to grievance management and ensures that the highest priority is given to high-risk grievances, as well as those related to the code of conduct, protection and security;
- Keeps the legal department of JP Autoceste adequately informed and consulted on all grievances that have legal consequences.; and
- Publishes and raises awareness of this grievance mechanism among local communities, contractors and other stakeholders, using appropriate and easily accessible approaches.

### 2.2 Scope of work and authority of responsible/contact person of grievance mechanism

The contact person will consider grievances related to project activities, take corrective measures in order to resolve them and communicate with the affected population, i.e. stakeholders.

The contact person of the grievance mechanism, is a key point for resolving grievances and is responsible for the entire process, from receiving, investigating and resolving to closing the grievance. This may be the same person conducting stakeholder engagement activities. All requests received through the grievance mechanism will be recorded in the grievance register and sent to the responsible person of JP Autoceste. The department in charge of the register of complaints will <sup>11</sup>:

- to act independently and freely and in accordance with the provisions of ESS10 and PR 10
- create conditions for stakeholders to be able to express their concerns about project activities in order to respond promptly and remove project weaknesses;
- act efficiently and promptly,
- to be accessible, culturally acceptable, publicly advertised and well-integrated into the project management system,
- to act free of charge for stakeholders,
- to provide the option of anonymity where feasible, and guarantee the confidential management of claims if the complainant so requests;
- to be fair, transparent and inclusive;
- to be guided by commitment and dialogue;
- to be predictable in terms of the process of grievance resolving;
- to be available in the way that it will not prevent access to the mechanism based on the financial capabilities of the complainants;
- to define responsibilities in grievance management procedures;
- to create tools for handling grievances;
- to improve the quality of work standards in grievance management procedures;
- to create grievance register.

The tasks of the grievance mechanism contact person are:

1. To receive and record received grievances and to categorise them by type and severity, especially those related to:
  - a. Land acquisition, and
  - b. Other project activities (further divided into grievances received directly and through other channels such as regular legal mechanisms or other available channels (ombudsman, PAM))
2. Classification of grievances by their complexity: low, medium and high. The assessment of the complexity of the grievance is based on the potential consequence of the grievance (actual or possible). Each level of complexity is described in Table 2.

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<sup>11</sup> *Environmental and Social Standards of EIB; ESS10 and Performance Requirement 10 – Stakeholder Engagement; Art. 28; Art. 46.*

Table 2 Grievance complexity levels

COMPLEXITY LEVEL	DESCRIPTION	RESPONSIBILITY
<b>Low</b>	Grievance severity will not change the circumstances for the stakeholder. The grievance can be resolved directly at the site. Grievance should be closed as soon as possible.	JP Autoceste FBiH - Department for Study Documentation, Social and Environmental Policy within JP Autoceste
<b>Medium</b>	Grievance severity may change the circumstances for the stakeholder. Technical support of certain departments of JP Autoceste is necessary for solving it.	JP Autoceste FBiH - Department for Study Documentation, Social and Environmental Policy within JP Autoceste / Certain JP Autoceste Department
<b>High</b>	Grievance severity will certainly change the circumstances for the stakeholder. Grievance type may encourage additional stakeholder involvement. The proposal to resolve the grievance implemented by JP Autoceste does not satisfy the stakeholder, and it is necessary to engage an independent third party <sup>12</sup> .	JP Autoceste FBiH Managing Board

3. Participation in resolving grievances by proposing and taking corrective measures in case of low and medium complexity grievances, and in case of high complexity grievances the contact person forwards the grievance to the company's management with a proposal for solution, in this case the management has the authority to decide to engage the third party (mediation or arbitration)<sup>13</sup> which is explained in Flowchart 1.
4. If a certain grievance cannot be resolved or corrective action does not need to be taken, the contact person will give an explanation of the reason why the grievance cannot be resolved, and will refer the complainant who submitted the grievance to the national legal mechanisms for resolving<sup>14</sup>.

<sup>12</sup> EBRD Grievance Management – Guidance Note, 4.3 Third Party Involvement: Independent mediation or arbitration

<sup>13</sup> EBRD Grievance Management – Guidance Note, 4.3 Third Party Involvement: Independent mediation or arbitration

<sup>14</sup> EIB ESS 10 – Stakeholder Engagement, Art. 50.

## 2.3 Third party engagement: mediation or arbitration <sup>15</sup>

Establishing a second tier grievance mechanism with a certain level of independence from the client (JP Autoceste) can very often be necessary when it comes to projects that expect a significant number of grievances or receive a large number of grievances of high complexity. Such projects are considered complex and involve purchase of land. Depending on the circumstances, a second tier grievance mechanism may involve the engagement of third parties such as: local law firms, reputable NGOs, or other reputable persons. The second tier's remit would only be those grievances which have been reviewed by the first-tier internal mechanism where internal decision has been reached and the complainant is dissatisfied with the proposed resolution.

Flowchart 1 presents the relationships in the grievance resolution process between different levels in a typical grievance mechanism. Depending on the circumstances of the project and the local community, the second tier grievance mechanism may be assigned one or both of these functions:

- mediation, which should facilitate the efforts of both parties to reach an acceptable solution
- binding arbitration, where both parties undertake to accept the decision of the independent arbitrator. (an arbitrator is institutionally recognized expert in the field of the grievance subject).

Due to the significant resource requirements (time, financial and human) that the process of resolving a grievance with the help of a mediator/arbitrator or through an intermediary represents, JP Autoceste will give priority to resolving the grievance peacefully and engage in mediation only as a last resort.

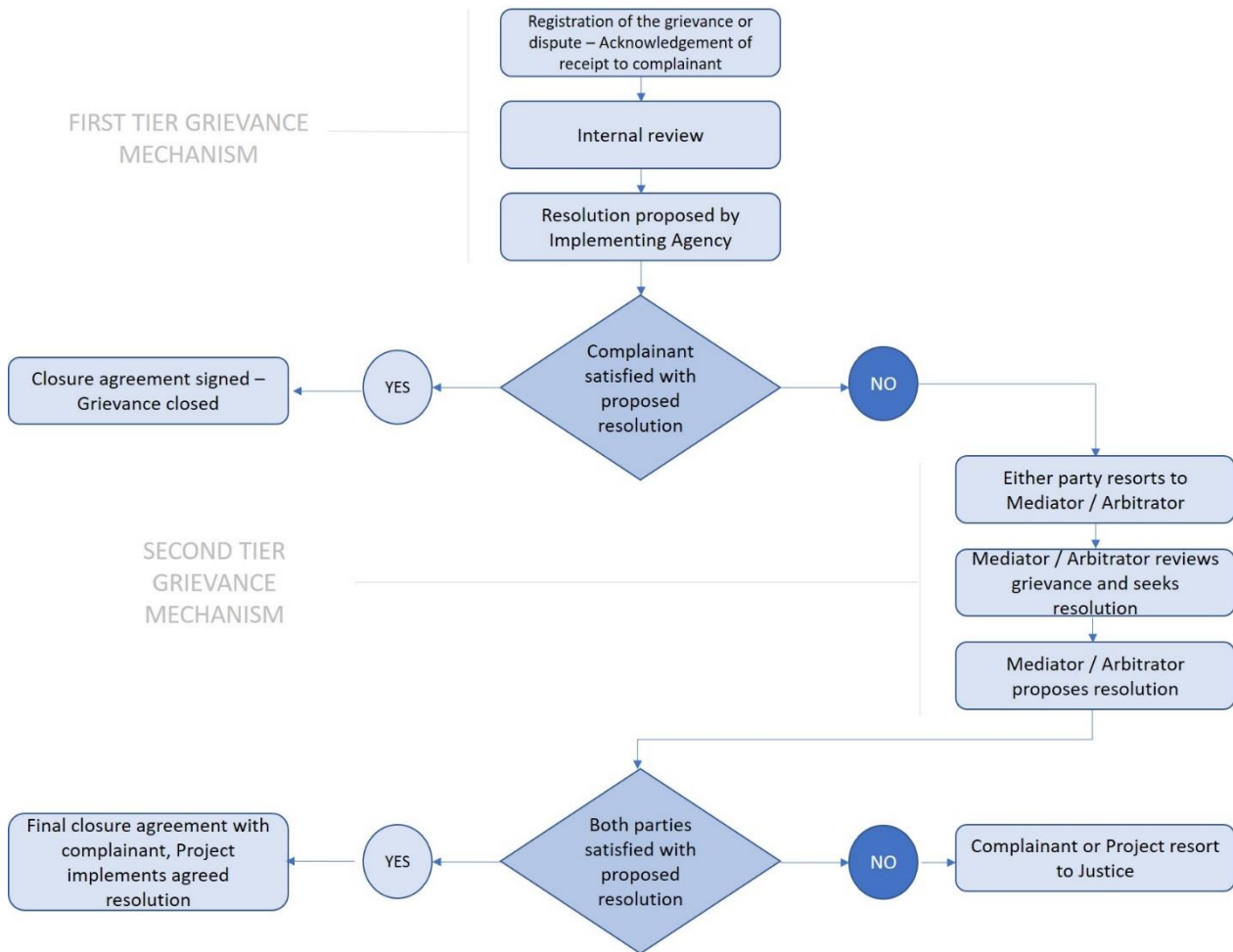
In the event that the complainant engages a third party by himself, JP Autoceste is not responsible for any costs incurred in this process, unless so agreed as part of the resolution of the grievance or unless ordered to do so by the court.

However, in case that mediation /arbitration fails, the complainant has the right to resort to national legal system.

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<sup>15</sup>EBRD *Grievance Management – Guidance Note, 4.3 Third Party Involvement: Independent mediation or arbitration*; EIB ESS 9 – *Public Health, Safety and Security, Art. 55*; EIB ESS 10 – *Stakeholder Engagement, Art. 48*.

Flowchart 1 – Grievance resolution through first tier and second tier grievance mechanism



## 2.4 Forms of submitting the grievances

All comments, questions or grievances may be submitted to the contact person of grievance mechanism in the following ways:

1. In the municipality: with the grievance form (Annex 1) is available in all project-affected municipalities, where complainants are provided with assistance in completing the form and in formulating the grievance. Immediately upon receipt of the filled grievance form, the municipality is obliged to submit it to contact person (scanned to the e-mail address specified in the form and by post service to the address also specified in the form).
2. On the construction site: the grievance form must be available at all times on the construction site where the contractor and the investor's representative (JPAC) are obliged to provide assistance in completing the form and in formulating the grievance, and are obliged to submit it to contact person (scanned to the e-mail address specified in the form and by post service to the address also specified in the form).

3. Electronically to one of the following two email addresses:
  - [info@jpautoceste.ba](mailto:info@jpautoceste.ba) from where the received e-mail is forwarded to the contact person of the grievance mechanism, or
  - [prituze@jpautoceste.ba](mailto:prituze@jpautoceste.ba) to which the contact person for the grievance mechanism has access.
4. By phone, calling the number \_\_\_\_\_, where the person answering is obliged to switch the contact to the contact person for the grievance mechanism or his deputy.
5. By fax, on the number: \_\_\_\_\_ which is communicated by standard protocol to the contact person for the grievance mechanism.
6. An electronic grievance register system operated by the grievance contact person or his/her deputy, accessed through the JPAC website [www.jpautoceste.ba](http://www.jpautoceste.ba).
7. By talking to an employee of JP Autoceste and the contractor on the project section.

## 2.5 Work policy of grievance mechanism

1. Grievances are received by the contact person of the grievance mechanism or in his absence by his deputy. The hotline for complaints and e-mail is open from Monday to Friday from 09:00 to 14:00, however if the interested party leaves a grievance (in a voice message), outside working hours or on weekends, the contact person will try to contact the interested party as soon as possible to record the details of the grievance. The deadline for recording a grievance in the central register is three (3) working days.
2. After the receipt of the grievance, the contact person must firstly identify if what was received is a genuine grievance (based on the definition of a grievance - see page 3 "What is a grievance?"). Once identified a grievance or non grievance can be channelled accordingly. Grievances are further channelled to the grievance mechanism as described below, and non-grievances are addressed through stakeholder engagement plan (every project must have a prepared SEP).
3. The contact person must immediately (within the same day), and no later than seven (7) working days notify the complainant that the grievance was received and that it is being processed.
4. If necessary, a person familiar with the subject of the grievance from a certain department within the company may be invited to provide additional information to the contact person. The contact person considers the grievance and determines the level of its complexity (low, medium or high), and acts accordingly. For a low and medium level of complexity, the contact person itself proposes measures to solve the problem, while for a high level of complexity, it submits an appeal with a proposal for a possible solution to the company's management for a decision.
5. During the execution of works, the investor's representative and the contractor, in the area of their responsibility, are obliged to participate in resolving the complaint.
6. If the contact person cannot resolve the issue which is the subject of the grievance because it is unclear or unfounded, it shall inform the complainant and invite him to reformulate his grievance. The deadline for submitting this notice is ten (10) business days. If the grievance is still unclear,

the contact person makes a decision to reject it, with a detailed record of why the grievance was not resolved. The deadline for sending the decision on rejection to the complainant is ten (10) working days.

7. If a particular grievance cannot be resolved and action is not required, the complainant shall be provided with a detailed explanation as to why the matter has not been resolved within ten (10) working days. The response will also clarify how the complainant can proceed through the second tier grievance mechanism or through the court in case he/she is not satisfied with the outcome.
8. After defining the corrective measures for resolving the grievance, the complainant shall be informed thereof within thirty (30)/forty-five (45)/sixty (60) working days depending on the level of complexity low/medium/high. If the complainant is not satisfied with the proposed solution, either party (the complainant or JP Autoceste) can contact a third party mediator or arbitrator and engage him to give an independent opinion on the issue. This triggers a second tier grievance mechanism. After the third party proposes a solution to the given problem within the agreed deadline, if both parties agree with the solution, the grievances closed, if not, the grievance can be further resolved in court.
9. The conclusion/response to the grievance is written by a contact person of the grievance mechanism and is immediately forwarded to the complainant and every other person or organisation which concerns the proposed corrective measures.
10. The contact person of grievance mechanism does not have the legal authority to resolve the land acquisition procedure or to influence it in any way.
11. Internal procedure describes in detail the authority of the contact person as well as its the work policy

Table 3 Timeframe for resolving the received grievances<sup>16</sup>

ACTIVITY	TIMEFRAME
Registering the grievance in the registry	3 days
Sending a confirmation of the receipt of the grievance to the complainant	7 days
Issuance of a decision rejecting the grievance (if applicable)	10 days
Sending feedback (if the grievance is still unresolved)	10 days
Sending feedback (when a mitigation measure is established)	30/45/60 days depending on the complexity
Sending a decision to close the grievance	30 days from the date of the agreement

## 2.6 Keeping a central register of grievances

<sup>16</sup> Indicative grievance management timeframe is given in EBRD Grievance Management – Guidance Note; 3.1 Grievance Administration

1. The contact person of the grievance mechanism is obliged to keep a register of received grievances/comments.
2. The register should have all the necessary elements so that the received grievances/comments can be classified by gender, age, etc. of the persons who submitted them as well as by the type of grievances/comments.
3. When recording the received grievance/comment, it is necessary to take into account whether the complainant is a person directly affected by the project or a member of the local community, or an organization such as NGO.
4. The register of received grievances/comments will be kept separately for grievances/comments related to the land acquisition procedure and for those received from members of the local community who are affected by any activity related to construction works at all stages.
5. The register should also be kept for grievances that arrived outside the grievance mechanism (e.g. administrative disputes, complaints about which JP Autoceste FBiH was informed through the media, etc.) The Property Legal Department conducting the expropriation procedure in front of JPAC is obliged to keep a register of administrative disputes, court cases by motorway sections, and it will deliver this register to the contact person of the grievance mechanism as often as prescribed by the internal procedure. The Representation Service will also inform the contact person of the grievance mechanism about the completion of the court cases.
6. Any grievance/comment will be recorded in the register with the following information:
  - Assigned registration number and date of receipt of the grievance
  - Way in which grievance was received
  - To which subsection of the motorway the grievance relates
  - Grievance description
  - Status of the complainant (person directly affected by the project/member of the local community), his/her name and surname (if not anonymous) and contact details
  - Date of sending the acknowledgment of receipt of the grievance to the complainant
  - Description of actions taken (date of commission meeting, investigation, proposed corrective measures)
  - Date of sending the decision rejecting the grievance with proposed corrective measures/providing feedback to the complainant
  - Date of resolving and closing the grievance
  - Date of signing the final agreement on resolving the grievance
  - Date of third party engagement (if applicable)



## 2.7 Application of resolution measures

The contact person of the grievance mechanism will discuss the proposed resolution with the affected stakeholder and agree on the appropriateness of the response and the proposed deadline for implementation. Once an agreement is reached, the contact person of the grievance mechanism will make sure that this agreement is documented and recorded in the central grievance register. The contact person can also be orally informed about the acceptance of the decision of the complaint, about which an official note will be made in the form of written consent to the proposed decision to be signed by both parties, and close the case if there are no further complaints. This will be applied in case of the low and medium complexity level.

The contact person of the grievance mechanism will inform the responsible person of JP Autoceste that a proposed resolution can be implemented and will monitor the implementation of the agreed solution. The contact person of the grievance mechanism will close the grievance resolution process after a successful resolution measure and no further action is required.

The grievance mechanism will also be used by the contractors of JP Autoceste to manage grievances related to the construction. Contractors should create their own grievance mechanism or they can adopt grievance mechanism of JP Autoceste. Their staff member/community liaison officers must be trained to process grievances.

The conditions that should be met in order for JP Autoceste to provide assistance to the contractor in managing grievances are as follows:

- The stakeholder requests an overview of the contractor's proposed resolution measure;
- The implementation of the grievance resolution measure proposed by the contractor fails;
- The grievance reappears with major negative consequences;
- The grievance concerns allegations of violations of the code of conduct, bribery, corruption and political interference;
- Difficult and/or problematic labour issues (e.g. strikes); and
- Grievance is a health, safety, environmental and/or social incident.

## 2.8 Reporting

The contact person of the grievance mechanism is obliged to prepare reports on submitted grievances.. These reports should be submitted quarterly to the Project Implementation Unit (PIU).

The grievance mechanism contact person will periodically review the grievance management process to eliminate systemic problems and ensure that the resolution process works effectively and yields effective results. The table below provides recommended indicators for monitoring, but can be further expanded or modified for the project as needed. Monitoring indicators are very important in identifying trends e.g. if most grievances are related to the same issue (such as land) that will indicate that organizational processes will need to be revised.

Table 4 Monitoring indicators

Commitment	Indicator (target is 100%)
<b>Efficiency</b> Timely resolution	Total number and types of grievances received, registered, acknowledged, processed, resolved and closed within set timeframe of 10 days (minor problems) and 30-60 days (moderate to severe problems). Number of grievances received and resolved within set timeframe. Number and percentage of grievances solved/not resolved during set timeframe. Median days to closure.
<b>Effectiveness</b> Awareness, usage, satisfaction of grievances	Number of stakeholders satisfied with solution. Number of comments received; number of grievances received. Number of grievances not completed (for various reasons). Level of awareness and understanding of the mechanism by stakeholders. Number of stakeholders satisfied with level and timing of information they received during the grievance process. Number of cases requesting a second review or third-party arbitration.
<b>Commitment</b> to integrate procedural lessons learned	Demonstrate that the root causes have been analysed and that lessons learned from case examples have been identified and more widely included in the data for audits of the grievance mechanism and contractor practices.

The contact person of the grievance mechanism of JP Autoceste will also compile monthly reports based on the following indicators:

- Total number of received grievances;
- Number of unaccepted grievances;
- Number of grievances by the level of complexity;
- Number of backlog grievances;
- Number of grievances per local area;
- Number and category of repetitive grievances; and
- Number of grievances that are closed in relation to the open grievances.

JP Autoceste will also monitor the effectiveness and relevance of the grievance mechanism for contractors and make adjustments as necessary.

### 3. ANNEX 1 – Grievance mechanism form

Reference number:		
Full name (optional)		
<input type="checkbox"/> I wish to raise my grievance anonymously. <input type="checkbox"/> I request not to disclose my identity without my consent.		
Contact information		<input type="checkbox"/> <b>By Post: Please provide mailing address:</b> _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).		<input type="checkbox"/> <b>By Telephone:</b> _____ <input type="checkbox"/> <b>By E-mail</b>
Preferred language of communication		<input type="checkbox"/> <b>Bosnian / Serbian / Croatian</b> <input type="checkbox"/> <b>English (if possible)</b>
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"/> <b>One-time incident/grievance (date _____)</b> <input type="checkbox"/> <b>Happened more than once (how many times? _____)</b> <input type="checkbox"/> <b>On-going (currently experiencing problem)</b>	
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: [pritzbe@jpautoceste.ba](mailto:pritzbe@jpautoceste.ba)

## 4. ANNEX 2 – Sample grievance register

Reference number	Way in which grievance was received	Project/subsection	Date of receipt	Grievance type	Grievance description	Complainant		Date of receipt acknowledgement	Description of actions taken	Date of resolving/closing the grievance
						Status	Gender			