

# Stakeholder Engagement Plan for EIB

## CATEGORY A PROJECT Bosnia and Herzegovina Corridor Vc in FBiH

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## Stakeholder Engagement Plan for Sub-section Medakovo - Poprikuše

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August, 2020

## Abbreviations

BiH	Bosnia and Herzegovina
EIB	European Investment Bank
EIB ESS	EIB's Environmental and Social Standards
EBRD	European Bank for Reconstruction and Development
EBRD ESP	EBRD's Environmental and Social Policy
EP	Environmental Permit
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plan
FBiH	Federation of Bosnia and Herzegovina
FMET	Federal Ministry of Environment and Tourism
JPAC	Javno preduzeće Autoceste Federacije Bosne i Hercegovine /Motorways of the Federation of Bosnia and Herzegovina
LALRP	Land Acquisition and Livelihood Restoration Plan
LC	Local Community
PIU	Project Implementation Unit
NGO	Non-governmental Organisation
NTS	Non-Technical Summary
PAP	Project Affected People
ESS	Environmental and Social Standard
PR	Performance Requirement
SEP	Stakeholder Engagement Plan

# 1 INTRODUCTION

## 1.1 Description and the Context of the Project

### Introduction

PC Motorways of the Federation of Bosnia and Herzegovina (the Company or “JPAC”), a limited liability company wholly owned by the Federation of Bosnia and Herzegovina (FBiH), is working on the development of the motorway which is a part of the Trans-European Corridor Vc connecting Budapest (Hungary) and Port of Ploče (Croatia). The total length of the Corridor Vc in FBiH is approx. 335 km, of which approx. 100 km has already been constructed and is operational. The Corridor alignment is divided into four lots, as shown in the map below.

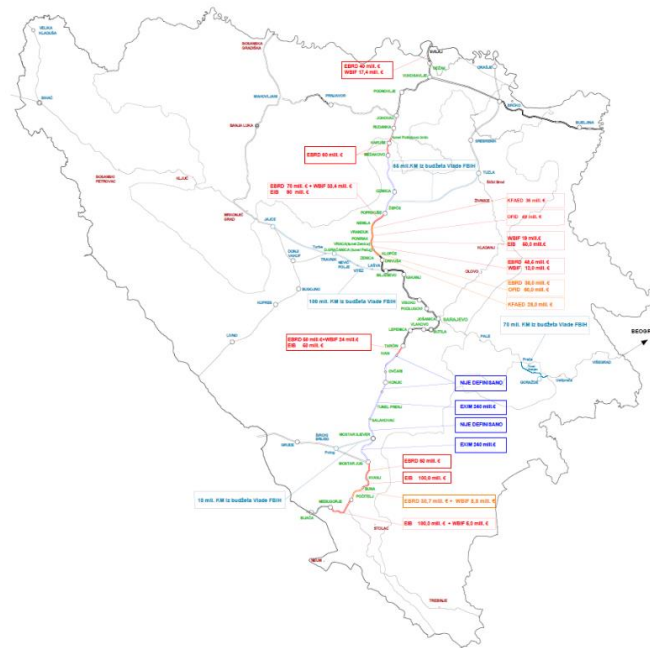


Figure 1: LOTS of Corridor Vc in Bosnia and Herzegovina

The European Investment Bank (the “EIB” or the “Bank”) is considering providing finance of a sovereign-guaranteed loan to the Motorways of the Federation of Bosnia and Herzegovina (the Company or “JPAC”). The Project is a follow-on operation to the Bank’s previous projects for the construction of four key motorway sections of Corridor Vc in FBiH. The Project involves the construction and operation of a motorway sub-section **Medakovo - Poprikuše in total length of 34.5 km** on the Corridor Vc (LOT 2).

## Brief Description of the Project

Section Medakovo – Poprikuše is 34.5 km long. It consists of two subsections: Subsection 1: Medakovo – Ozimica and Subsection 2: Ozimica – Poprikuše.

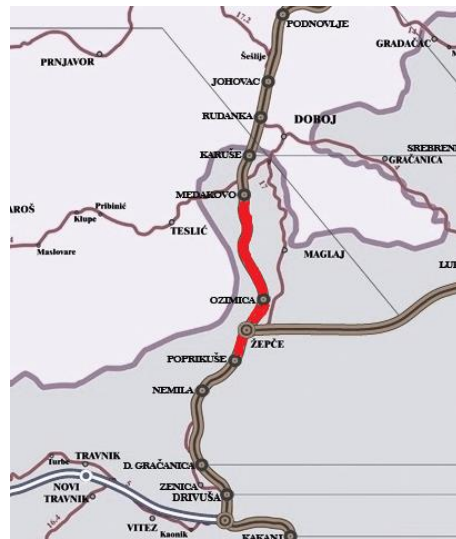
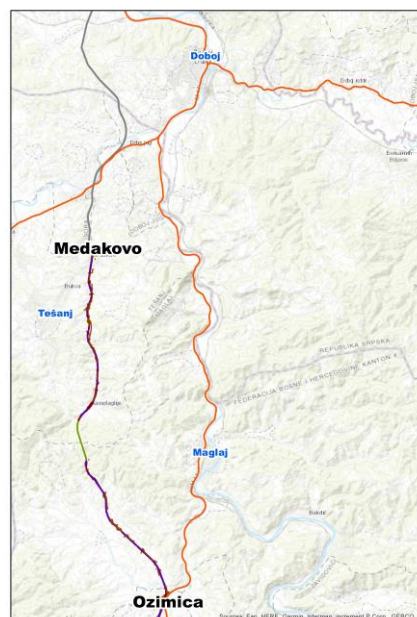


Figure 2: Subsection Medakovo – Poprikuše on Corridor Vc

## Subsection 1: Medakovo – Ozimica



The total length of part 1 of this motorway section according to the preliminary design is approximately 21.7 km. Medakovo - Ozimica subsection starts from the interchange Medakovo at km 4+100 and in the next 10 km passes through populated areas (Medakovo, Alispahići, N. Šeher, Ljubatović, etc.). In many parts it is in collision with existing rivers where river regulation is planned. Although the regulation of rivers will have a positive effect on safety from possible flooding of the surrounding areas in the future, it will on the other hand limit the route of the motorway to a narrower zone, which will cause many collisions with existing and newly designed roads. At km 7 + 700, a mutual accompanying service facility, TCC “Tugovo” TYPE 2, is planned. From km 14 + 000.00 to km 15 + 800.00 the route passes through a tunnel approximately 1800 m long. After exiting the tunnel, the route is laid toward the south. At km 20 + 200, a mutual TCC “Galovac” TYPE 1 (accompanying service facility) is planned. In the continuation, the route passes through the edges of smaller settlements and

comes at km 24 + 700 to the Ozimica interchange. Within these interchanges, toll points will be designed after which a connection to the main road is planned.

Most significant structures:

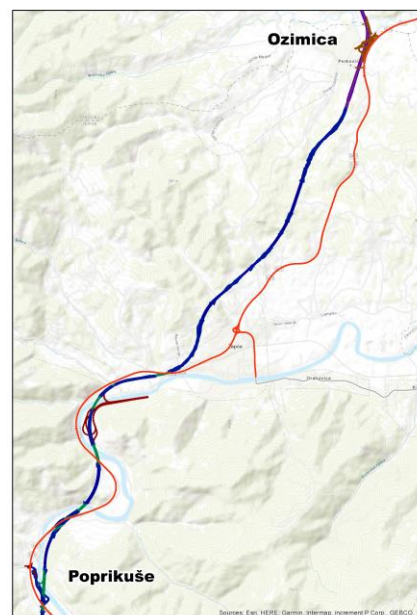
Seven bridges of different lengths are planned along the route from the shortest 84,00 m till longest 370,00 m: Bridge 1 (L=249,00 m), Bridge 2 (L=84,00 m), Bridge 3 (L=370,00 m), Bridge 4 (L=211,00 m), Bridge 5 (L=190 m), Bridge 6 (L=115 m), Bridge 7 (L=186 m),

In addition to the bridges, also underpasses are planned (16 underpasses) with widths of 9-11 m and lengths from 40 to 90 m.

Small bridges over river regulation: 18 pcs. Hydraulic passages with a span of up to 10 m: 10 pcs. Retaining walls L=1.500 m.

The route also includes one Tunnel - Crni Vrh , 2218 m long, and two TCC – type 1 and type 2.

### **Subsection 2: Ozimica – Poprikuše**



The Ozimica – Poprikuše subsection starts from the Ozimica interchange. The total length of the part 2 of this motorway section according to the preliminary design is approximately 12,8 km. The beginning of the route fits into the section Karuše - Ozimica just behind Ozimica interchange. Further route continues and in the part of the settlement Tupanovac enters to tunnel No. 1 (L=675,00m, R=650,00m) and at a distance of approximately 300m enters to tunnel No. 2 (L=225,00m, R=245,00m).

Further along the route, following objects are placed:

- bridges MO1 (L=294,00m, R=256,00m), MO2 (L/R=110,00m), MO3 (L/R=218,00m), MO4 (L=245,00m, R=282,00m),
- underpasses with lengths 40,00m and 45,00m and open road till „Gradina“ and then enters to tunnel No. 3 (L=385,00m, R=380,00m). After tunnel No. 3 the road continues downhill and near settlement Šećin Han crosses over existing main road and railway in the length of 45,00 m. After mentioned crossing, the road continues with the bridges over Bosna river, railway, and the existing main road MO5 (L=310,00m, R=270,00m), MO6 (L/R=30m), MO7 (L=256,00m, R=294,00m), MO8 (L=406,00m, R=356,00m) and enters to tunnel No. 4 in area of Brezovo Polje (L=680,00m, R=770,00m). After tunnel No. 4, the route continues again over the Bosna river with bridge MO9 (L/R=178,00m), and then the route will cross over the existing M17 road and railway with the underpass in length of 11,20 m and 15,00 m. Due to inconvenient angle at which M17 road intersects, road deviation is foreseen in length of 699,4m.

Further it continues to the tunnel No. 5 „Želeća“ (L=713,00m, R=606,00m). In front of the tunnel a ramp is foreseen for the transition from one road to another in case of works or accident on a bridge or in the tunnel. Length of the ramp is 100 m. This also marks the end of the section Ozimica - Poprikuše.

In total, 9 bridges of different lengths are planned along the route from the shortest 35,00m to the longest of 476,00m. Mostly larger and more demanding structures are planned over the Bosna river, the existing main road, and railway. In addition to the bridges, there are also planned underpasses with widths of 9-11 m and lengths from 40 to 90 m. Tubular culverts are also planned in places of intersection with watercourses, and there are two of them in the following places:

1. Km 6+722,20 L=80,5m (motorway)
2. Km 0+418,90 L=41,0m (M17).

The route in total includes five tunnels with lengths of 225,00 to 770,00m. Also, one rest area of type 2 is foreseen. All above mentioned object lengths are taken from preliminary design, and will be definite after measurement on the field for the purpose of the detail design preparation.

Update of the environmental impact assessment has been carried out in September 2019 by independent consultant, Ecoplan Ltd. Mostar, and based on it the environmental permit was renewed in September 2019.

It should be noted that possible minor amendments to the section may be planned during the development of the main design. As part of the Project, additional access roads are also yet to be designed, as they are necessary for improving the local road network and to ensure access to the land plots losing access due to motorway construction. These details will be known after the main design is prepared.

## Project Benefits

The key benefits of the Project are:

- Improved access to tourist centres, religious, recreational, catering and health facilities;
- Enhanced ability of communities to attract new business investments and economic development as a result of improved access to regional transport infrastructure;
- Improved transport services (reduced travel time of people and transport time of goods), which will improve the living and working conditions of local communities;
- Reduced traffic on local roads which can have positive impacts such as improved local air quality, noise reduction and therefore better living conditions.

## Project Categorisation

The 34.5 km motorway section from Medakovo to Poprikuše has been screened as a Category A project in line with EU Environmental Impact Assessment (EIA) Directive<sup>1</sup>.

### 1.2 Objectives and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (“SEP”) was developed by JPAC in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

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 EIB.

This SEP will be updated as necessary.

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<sup>1</sup> <https://www.eib.org/en/press/news/environmental-and-social-safeguards>



## 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*<sup>2</sup>, 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 also obliged to undertake all necessary measures to provide assistance to natural persons or legal entities seeking to exercise their rights.

It is also required, in accordance with the *Law on Public Enterprises in FBiH*<sup>3</sup>, 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*<sup>4</sup> 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 Environmental Impact Assessment**. 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. The Environmental Permit (EP) is issued after the EIA is revised and all the relevant comments received from interested parties are taken into consideration<sup>5</sup>.

In line with the *Decree on Single Methodology for Developing Spatial Planning Documents*<sup>6</sup>, **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, etc.

In addition, according to the *Law on Physical Planning and Land Use at the Level of FBiH*<sup>7</sup>, prior to the issuing of Construction Permits, 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 2(c) 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)

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<sup>2</sup> Official Gazette of FBiH, No. 32/01

<sup>3</sup> Official Gazette of BiH, No. 81/08

<sup>4</sup> Official Gazette of FBiH, No. 33/03 and 38/09

<sup>5</sup> For this Project, the local EIA Study was developed in 2019. This EIA Study was submitted to the Federal Ministry of Environment and Tourism (FMET) together with the request for an EP. EP was obtained in September 2019.

<sup>6</sup> Official Gazette of FBiH No. 63/04, 50/07 and 84/10

<sup>7</sup> Official Gazette of FBiH, No. 2/06, 72/07, 32/08, 4/10, 13/10 and 45/10



- **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 EIB Requirements

EIB has set out a comprehensive set of specific Environmental and Social Standards (ESSs) that projects are expected to meet. ESS 10 (*Stakeholder Engagement*) of EIB's Environmental and Social Standards (ESS) emphasises the importance of an 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 ESS 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 affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EIB's ESS contains specific disclosure and consultation requirements for "Category A" projects (i.e., projects which may result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified). The environmental and social impact assessment process includes a public disclosure and consultation process as specified in ESS 10. Where an Environmental and Social Action Plan (ESAP) has been agreed between EIB 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.

In line the EIB Group Transparency Policy (2019)<sup>8</sup> EIB is committed to promoting sustainable development in all of its investments, as a key contributor to economic transition. To ensure that the environmental and social practices of Bank Projects meet EIB standards, the Bank requires that Projects comply with its Environmental and Social Standards. In addition, the Bank is required to disclose certain Project information to the public in accordance with its Group Transparency Policy, to enhance transparency and accountability, improve discourse with affected stakeholders, and foster good governance. Furthermore, the EIB Complaints Mechanism (EIB-CM) <https://www.eib.org/en/about/accountability/complaints/index.htm> further affirms these commitments and has the purpose to facilitate the resolution of social, environmental and public disclosure issues among Project stakeholders; to determine whether the Bank has complied with its ESS and the Project-specific provisions. For "Category A" projects, the Bank will make available environmental and social impact assessments on the EIB website.

### 3 PREVIOUS STAKEHOLDER ENGAGEMENT

#### **Public consultations in line with environmental permitting requirements**

JPAC conducted the local EIA process for the entire Corridor Vc alignment (divided in four LOTs with respective EIAs). The project section that is considered for financing is part of LOT 2 Dobož South – Sarajevo South. The Scoping decisions for these four lots were issued in 2005 while the EIAs were approved in 2007. Public consultations were carried out in two stages: (i) after the Scoping Report and (ii) after the Final EIA Report. In both stages the documents were publicly disclosed for 30 days. Public consultations were organised in the municipalities along the corridor, including Zenica and Sarajevo (LOT 2). No significant public complaints had been recorded in respect to environmental and social issues on the project section. After the successful EIA process, Environmental Permit for LOT 2 was issued (in 2007).

In 2014 the EP was renewed based on the updated EIA. In accordance with national legislation JPAC was not obliged to conduct public consultations for this process. In 2019 EP was again renewed based on updated EIA, and again public consultations were not conducted in accordance with national legislation. JPAC initiated the environmental permitting procedure for the whole section Dobož South – Sarajevo South by preparing the EIA Study. EIA was updated in line with the EBRD requirements since financed the EIA renewal. The EIA is complied with local legislation and EBRD requirements.

#### **Public consultations in line with spatial planning requirements**

##### *Spatial Plan of FBiH 2008-2028*

Public consultations were also undertaken in 2012 in relation to the new Spatial Plan of FBiH 2008-2028 (which is still in parliamentary procedure). The Federal Ministry of Spatial Planning, on behalf of the Spatial Plan proponent (Government of FBiH), organized public hearings during a 60-day period, from 15 February 2012 until 15 April 2012. A public hearing was organized in each canton, and a central public hearing was organized in Sarajevo on 16 April 2012. The information on public hearing was sent to the Federal News Agency (FENA), and published in daily newspapers (*Dnevni Avaz* and *Oslobođenje*).

According to the Report on the consultation undertaken during the development of the Spatial Plan of FBiH 2008-2028, a public consultation meeting was organised in Mostar on 13 March 2012. Issues raised related to the Corridor Vc were not relevant to the Project section covered by this SEP.

##### *Spatial Plan for Area of Special Interest to FBiH – Motorway Corridor Vc*

The initial text of the Spatial Plan for the Motorway on Corridor Vc in FBiH was prepared in 2010 without the sections in Blagaj and Počitelj, due to opposition by local communities. It was decided at the time by the FBiH Parliament to conduct additional research and consider alternative solutions for this section within a 6-month period. In 2011, the full draft of the amended Spatial Plan was made available for public consultations. Two public hearings were organised:

- a public hearing in Mostar (November 2011), organised by the Federal Ministry of Spatial Planning, and
- a public hearing in Sarajevo (November 2011), organised by the BiH Parliament (Committee for Transport and Communication).

The Plan was then adopted by the FBiH Parliament and officially published in December 2017.

### Public consultations during preliminary design phase

During the preliminary design phase, JPAC maintained continuous communication with local community representatives of the Medakovo – Poprikuše section. Table 1 below shows the schedule of the documented communication:

No.	Date	MoM from:	Subject
1	10.01.2020	Tešanj Municipality	Local community suggestions on the presented preliminary design
2	30.01.2020	JP Autoceste	Meeting held with representatives of Tešanj Municipality, Parliament Assembly of BiH, design company Divel, design company IPSA
3	02.02.2020	JP Autoceste	Answer to the local community suggestions
4	25.02.2020	Maglaj Municipality	MoM from the presentation of motorway route (through Maglaj Municipality)
5	27.04.2020	Tešanj Municipality	Suggestions on the presented motorway route through Tešanj Municipality

Both sections Medakovo – Ozimica and Ozimica – Poprikuše are now in the process of main design preparation where the designer and JPAC are obliged to maintain this communication with local communities.

## 4 STAKEHOLDER ENGAGEMENT PROGRAM

### 4.1 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 success 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 2, section 4.5 of this document) may directly contact JPAC to make themselves and their needs known and to facilitate the effective implementation of the SEP.

### 4.2 Responsibility for SEP implementation

A Project Implementation Unit (PIU) for this motorway section will be set up after the loan agreement is signed for this subsection. PIU will be responsible for Project implementation, including the implementation of this SEP, under the supervision of the Lender. A Senior Associate for Site Level Management and Communication with Local Communities has been appointed at corporate level (within the Design Department – Division for Study Documentation, Social and Environmental Policy) with the aim to implement all activities related to stakeholders' engagement. This person will be a member of the PIU, will be the responsible person for the implementation of this SEP during the entire Project cycle, and in charge of communicating with the communities and processing grievances. The Compensation and Resettlement Coordinator will act as a contact person for enquiries (see contact information in Chapter 5 of this SEP). [Figure 5](#) shows the PIU members responsibilities for processing the grievances, while a detailed flowchart for processing grievances is given in Annex C to this SEP.

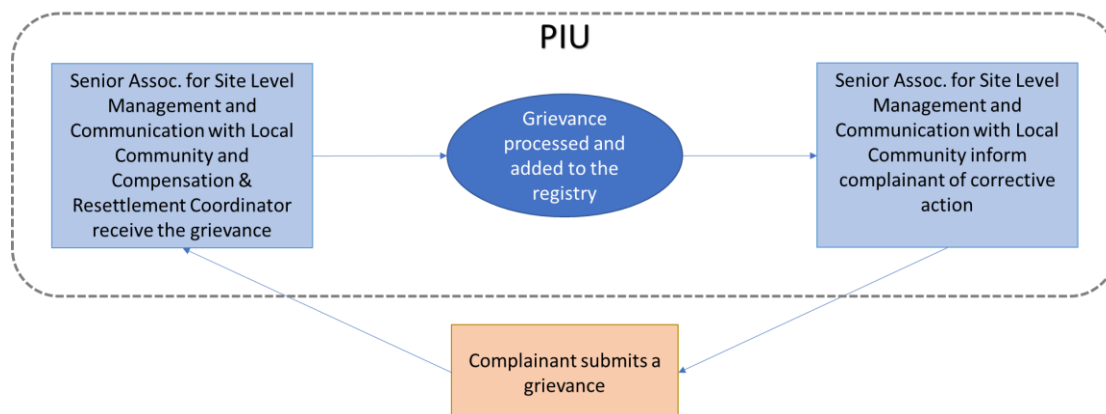


Figure 5: Scheme with PIU members responsibilities for processing the grievances

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP (see Chapter 5 for more details). The grievance mechanism requirements will be laid out in the tender documentation and contracts that will be signed with the contractors.

#### 4.3 Available Communication Tools and Resources

JPAC communicates with the public through its website ([www.jpautoceste.ba](http://www.jpautoceste.ba)), its Instagram page or its Facebook page, as well as electronic, digital and printed media (TV, newspapers, radio, online media). The website and profiles on social media are updated regularly and contain information on:

- JPAC operations (work plans, financial and audit reports, 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, through an online form, as well as through contact details provided on JPAC website. The formal Grievance Mechanism is described later in this document and a copy of the Grievance form is also provided (see Chapter 5 for more details).

#### 4.4 Planned Information and Communication Arrangements

JPAC carried out public consultations and information dissemination that reflected main issues of relevance to the Project.

##### Documents and information that were disclosed so far

JPAC already disclosed the following information:

- **Environmental Impact Assessment LOT 2 (2007)**
- **Environmental Impact Assessment LOT 2 (2019)**
- This **Stakeholder Engagement Plan** (SEP);
- **Environmental and Social Action Plan** (ESAP);
- **Environmental and Social Management Plan** (ESMP);
- **Public Grievance Form** (Annex 1) and **Public Grievance Leaflet** (Annex 2)
- **Non-technical Summary** of the environmental and social assessment of the Project;
- **Land Acquisition and Livelihood Restoration Plan (LALRP)**

##### Documents and information that are yet to be disclosed:

- **Biodiversity Management Plan** (BMP);

The documents will be publicly available in the local language (as well as English where available) immediately upon its availability, on the JPAC's website ([www.jpautoceste.ba](http://www.jpautoceste.ba)), the Municipality of Tešanj official website ([www.opcina-tesanj.ba](http://www.opcina-tesanj.ba)), the Municipality of Maglaj official website ([www.maglaj.ba](http://www.maglaj.ba)), the Municipality of Žepče official website ([www.opcina-zepce.ba](http://www.opcina-zepce.ba)) and the EIB website ([www.eib.com](http://www.eib.com)).

The documents will remain disclosed on the websites of JPAC, the municipalities of Tešanj, Maglaj and Žepče and EIB during a period of 120 calendar days prior to the consideration of the Project by the EIB'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 Buća 20, 88 000 Mostar
2. JPAC office in Sarajevo, Hamdije Kreševljakovića 19, 71000 Sarajevo
3. Municipality of Tešanj, Trg Alije Izetbegovića 11, 74260 Tešanj
4. Municipality of Maglaj, Viteška 4, 74250 Maglaj
5. Municipality of Žepče, Stjepana Radića 2, 72230 Žepče

### Planned meetings

JPAC will schedule and hold at least one public consultation meeting after the disclosure of the documents listed above. JPAC will inform all stakeholders about the exact date, time and venue where the meeting will be held, at least 7 days in advance (but preferably 2 weeks) through the following channels:

- the official website of JPAC,
- the official websites of the municipalities,
- local newspapers in wide circulation in FBiH (*Dnevni Avaz* and *Dnevni list*),
- announcements on bulletin boards of the municipalities and Local Community Offices.

All available Project information and documents will be disclosed to the public at least 2 weeks in advance of the meetings. If necessary, separate meetings will be held to ensure that the stakeholder engagement is gender-responsive.

At the meeting, JPAC will present the project footprint, the expected impacts and planned mitigation measures, as well as receive feedback on the NTS, ESAP and SEP from locally affected stakeholders. Information on land acquisition, biodiversity assessment, plans for road safety provisions and access arrangements will also be shared.

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 meeting will be agreed during the meeting and recorded. All justified comments and proposals will be considered 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 municipalities or by any identified stakeholder groups/individuals.

### Alternative approaches with COVID-19 restrictions in places

In case of COVID-19 restrictions remaining in place and affecting the ability to hold face to face public consultation meetings and individual meetings proposed in Table 2 below, a different approach will be implemented and widely communicated via social media and standard communication channels. Online public presentations will be organised instead of public consultation meetings, while online and telephone consultations will replace individual meetings. The opportunity to provide written feedback will remain.

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table 2 below.

Table 2: Summary of Stakeholder Engagement and Disclosure Requirements

No.	Activity	Timing/further detail	Responsibility
1	<p>Ensure that the following Project documents are publicised on the websites of JPAC and the municipalities:</p> <ul style="list-style-type: none"> <li>- This SEP,</li> <li>- Local EIA study,</li> <li>- Environmental and Social Action Plan (ESAP),</li> <li>- Environmental and Social Management Plan (ESMP)</li> <li>- Public Grievance Form (Annex 1) and Public Grievance Leaflet (Annex 2);</li> <li>- Non-technical Summary of the environmental and social assessment of the Project;</li> <li>- Biodiversity Management Plan (BMP);</li> <li>- Land Acquisition and Livelihood Restoration Plan (LALRP);</li> </ul>	<p>All available Project Information and documents will be disclosed to the public as soon as available, i.e. at least 2 weeks prior to the public meeting</p> <p>The documents will be publicly disclosed on the website of JPAC and the municipalities during a period of 120 calendar days prior to consideration of the Project by the EIB's Board of Directors and will remain publicly available throughout the life of the Project.</p>	<p>PIU/Senior Associate for Site Level Management and Communication with Local Communities and the municipalities: Tešanj, Maglaj and Žepče</p>
2	<p>Organise at least one public consultation meeting during Project preparation (but prior to the start of construction works)</p> <p><i>(In case of COVID-19 restrictions online public presentation will be organised)</i></p> <p>Encourage written proposals and comments Provide timely access to the documents before the meeting (at least 2 weeks in advance)</p>	<p>Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least seven days in advance (but preferably 14 days), through the websites of the JPAC and the municipalities, as well as local media</p>	<p>PIU/Senior Associate for Site Level Management and Communication with Local Communities</p>
3	<p>Organise individual consultation meetings <i>(In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings)</i></p>	<p>As needed or requested by the JPAC, municipalities or by any identified stakeholder groups/individuals</p>	<p>PIU/Senior Associate for Site Level Management and Communication with Local Communities</p>
4	<p>Document all opinions, remarks and possible solutions with regard to the Project raised by stakeholders during consultation meetings, and address appropriately</p>	<p>Ongoing</p>	<p>PIU/Senior Associate for Site Level Management and Communication with Local Communities</p>
5	<p>Publicise information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the websites of JPAC and City, and bulletin boards in Local Communities (LCs)</p>	<p>Two weeks prior to the start of construction works</p>	<p>PIU/Senior Associate for Site Level Management and Communication with Local Communities and the municipalities: Tešanj, Maglaj and Žepče</p>
6	<p>Publicise information about Project progress on JPAC website</p>	<p>Periodically</p>	<p>PIU</p>



Table 3: Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches with COVID-19 restrictions in places		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
<p><b>Project Affected People</b> Land owners/users who will be directly affected by land acquisition in the following Cadastre Municipalities:</p> <ul style="list-style-type: none"> <li>• Tešanj</li> <li>• Maglaj</li> <li>• Žepče</li> </ul>	<p>Land acquisition of private land plots will need to be carried out for the needs of the Project</p>	<ul style="list-style-type: none"> <li>• Providing timely information on land acquisition activities.</li> <li>• Presenting the draft LALRP and discuss all land acquisition issues and concerns.</li> <li>• Keeping records on land plots subject to land acquisition, uses, title holders and agreements.</li> </ul>	<ul style="list-style-type: none"> <li>• The draft LALRP will be disclosed in local languages and English on the official website of JPAC and website</li> <li>• The draft LALRP will also be made available at the premises of the JPAC and the municipalities: Tešanj, Maglaj, Žepče</li> <li>• A public consultation meeting will be organised by JPAC at the premises of the municipality offices</li> <li>• Land owners will be individually contacted and informed about the impacts of the Project on their property</li> </ul>	<ul style="list-style-type: none"> <li>• The draft LALRP will be disclosed in local languages and English on the official website of JPAC</li> <li>• The draft LALRP will also be made available at the premises of the JPAC and the municipalities</li> <li>• Targeted house-to house leaflet distribution in settlements with contact details and mechanisms for returning feedback</li> <li>• Land owners will be individually contacted by telephone</li> </ul>	<ul style="list-style-type: none"> <li>• Short-term engagement may not reach vulnerable people</li> <li>• During Covid-19, affected businesses (owners of affected land plots) may be closed which may make it difficult for JPAC to contact them.</li> </ul>	<ul style="list-style-type: none"> <li>• Face-to-face, one-to one interviews and discussions</li> <li>• Online and telephone interviews and discussions</li> </ul>
<p><b>Local residents and businesses in the vicinity of the Project area</b> The road section will be constructed in the vicinity of following settlements. These settlements are: 1. Medakovo – Ozimica:  Medakovo, Križanje, Tugovići, Hrgovci, Brezik, Jablanica, Selimovići, Koprivci, Čakrame, Karadaglije, Ivandići, Galovac, Jurišići, Ljubatovići, Liješnica, Ozimica.  2. Ozimica – Poprikuše:</p>	<p>During construction works, communities located in the vicinity of the planned construction works may experience restricted access and disturbances related to increased dust and noise due to machinery operation.</p> <p>During the operation phase, local residents will potentially be impacted by noise and exhaust gas emissions.</p>	<p>Providing timely information on risks and disturbances associated with the construction and operational phases</p>	<ul style="list-style-type: none"> <li>• Public consultation meeting, and individual meetings as necessary</li> <li>• Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the bulletin boards in Local Communities (LCs)</li> </ul>	<ul style="list-style-type: none"> <li>• Publishing information on JPAC and municipality websites</li> <li>• Disclosure focusing on online methods, local radio/TV/newspaper announcement</li> <li>• Targeted house-to house leaflet distribution in settlements with contact details and mechanisms for returning feedback</li> <li>• Follow-up calls if contact details are available</li> </ul>	<p>Short-term engagement may not reach vulnerable people</p>	<ul style="list-style-type: none"> <li>• Vulnerable people identified through discussion with local authorities</li> <li>• Face-to-face, one-to one interviews and discussions or online and telephone interviews and discussions</li> <li>• Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)</li> </ul>

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches with COVID-19 restrictions in places		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
Ozimica, Tatarbužk, Šećin Han, Varišište, Brezovo Polje, Golubinja						
<p>City and LCs:</p> <ul style="list-style-type: none"> <li>- City of Zenica,</li> <li>- LC Medakovo,</li> <li>- LC Alispahići</li> <li>- LC N. Šeher</li> <li>- LC Ljubatović</li> <li>- LC Ozimica</li> <li>- LC Tatarbudžak</li> <li>- LC Šećin Han</li> <li>- LC Varišište</li> <li>- LC Brezovo Polje</li> <li>- LC Golubinja</li> </ul>	Representing the interests of the Local Communities	Providing timely information on planned works, consultations regarding the prepared plans and documentation	<ul style="list-style-type: none"> <li>• Official correspondence</li> <li>• Public consultation meetings, and LCs consultation meetings as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Publishing information on the bulletin boards in the City and LCs</li> <li>• Official mails and written letters</li> </ul>	During Covid-19, local administration and LCs offices are not always open	<ul style="list-style-type: none"> <li>• Face-to-face, one-to one interviews and discussions</li> <li>• Online and telephone interviews and discussions</li> </ul>
<p>Relevant government authorities, ministries and public institutions, including:</p> <ul style="list-style-type: none"> <li>• Federal Ministry of Environment and Tourism</li> <li>• Federal Ministry for Spatial Planning</li> <li>• Sava River Basin Agency</li> <li>• BH-Gas Ltd</li> <li>• Railways FBiH</li> <li>• Public Enterprise Elektroprivreda HZHB</li> <li>• Elektroprenos BH</li> </ul>	Issuing permits, consents and opinions in accordance with the local legislation, control of compliance with local legislation, management of the PRTR register	Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures Reporting based on national legislation requirements	As defined by national legislation	<ul style="list-style-type: none"> <li>• Official mails and written letters</li> </ul>	During Covid-19, may be closed with difficulties to be contacted by JPAC	<ul style="list-style-type: none"> <li>• Face-to-face, one-to one interviews and discussions or telephone calls</li> <li>• Online and telephone interviews and discussions</li> </ul>
<p>Potentially interested international NGOs:</p> <p>All NGOs shall be provided with opportunities to voice</p>	Stakeholders, who are interested in the protection of the environment and human	Providing timely information, communication and consultations	<ul style="list-style-type: none"> <li>• Public consultation meetings, and individual consultation meetings as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure through the websites of JPAC and City of Zenica</li> <li>• Disclosure focusing on</li> </ul>	Short-term engagement may not reach all interested NGOs	<ul style="list-style-type: none"> <li>• Additional interested NGOs identified through discussion with local authorities</li> <li>• Face-to-face, one-to one</li> </ul>

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches with COVID-19 restrictions in places		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
their opinions or concerns throughout Project preparation and implementation.	health, are of high significance for the success of the Project.		<ul style="list-style-type: none"> <li>• Disclosure through the websites of JPAC and City of Zenica</li> <li>• Direct email communication</li> <li>• Local media/press releases</li> </ul>	online methods, local radio/TV/newspaper announcements <ul style="list-style-type: none"> <li>• Follow-up calls if contact details are available</li> </ul>		interviews and discussions
JPAC Employees, and the Trade Union	Stakeholders, who are directly or indirectly engaged in Project planning and implementation, are of high significance for the success of the Project.	Providing timely information about the planned Project activities	<ul style="list-style-type: none"> <li>• JPAC's internal communication channels</li> <li>• Trainings as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Emails to all employees</li> <li>• Virtual meeting</li> <li>• Video messages</li> <li>• Webinars</li> </ul>	<ul style="list-style-type: none"> <li>• Not all employees have email access</li> <li>• Employees may be off sick</li> </ul>	<ul style="list-style-type: none"> <li>• Telephone calls</li> <li>• Face-to-face, one-to one discussions</li> <li>• Online discussions</li> </ul>
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	Stakeholders, who are directly or indirectly engaged in Project planning and implementation, are of high significance for the success of the Project.	Provision of Project code of conduct and work safety and health regulations, environmental protection requirements	<ul style="list-style-type: none"> <li>• Information through tender procedure and contracts</li> <li>• Communication via supervising engineers</li> <li>• Toolbox talks at construction sites on relevant occupational health and safety topics</li> <li>• Monthly reports on progress of works to be submitted by contractors during construction works</li> <li>• Trainings as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Official email or written letter</li> <li>• Virtual meetings</li> <li>• Webinars</li> </ul>		

## GRIEVANCE MANAGEMENT

JPAC established a Central Complaints 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 Public Grievance Form ([Annex A](#)) will be disclosed on JPAC's website. In addition, a Public Grievance Leaflet ([Annex B](#)) will be disclosed on:

- the websites of JPAC and City of Zenica, and affected municipalities.
- in the offices of the Local communities (LCs) (Medakovo, Alispahići, N. Šeher, Ljubatović, Ozimica, Tatarbudžak, Šećin Han, Varišište, Brezovo Polje, Golubinja ) on whose territory the road section is planned to be constructed,
- on the construction site before the commencement of construction works.

Any comments or 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/comments to JPAC without delay 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 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.

All grievances will be recorded in the Central Complaints Registry and assigned a number, and acknowledged within 7 working days (the flowchart for processing grievances is enclosed in [Annex C](#)). The Registry will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by the type of grievance. Each grievance will be recorded in the registry with the following information:

- description of grievance,
- date of receipt of grievance and when acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures, preventive measures), and
- date of resolution and closure/provision of feedback to the complainant.

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

JPAC will make all reasonable efforts to address the complaint 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. The complainant will be informed about the proposed corrective action and the follow-up <sup>18</sup>

of the corrective action within 30 working days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

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.

At all times, complainants may seek other legal remedies in accordance with the legal framework of FBiH, including formal judicial appeal.

A separate grievance mechanism is available for workers.

*Contact information for enquiries and grievances:*  
Motorways of the Federation of Bosnia and Herzegovina  
Community Liaison Expert  
Address: Adema Buća 20, 88000 Mostar  
Tel: +387 36 512 352  
e-mail: [prituze@jpautoceste.ba](mailto:prituze@jpautoceste.ba)

## 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  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  
 Attention: Community Liaison Expert  
 Address: Adema Buća bb, 88000 Mostar  
 Hamdije Kreševljakovića 19, 71000 Sarajevo  
 Tel: +387 36 512 352  
 E-mail: [prituzbe@jpautoceste.ba](mailto:prituzbe@jpautoceste.ba)

## ANNEX 2 - Text for the Public Grievance Leaflet

JPAC is striving to ensure that the construction of the section Medakovo - Poprikuše, 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.

### 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 works 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 employees working on the Project;
- 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 free of charge in the following ways:

- verbally (in person or by phone)
- 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)

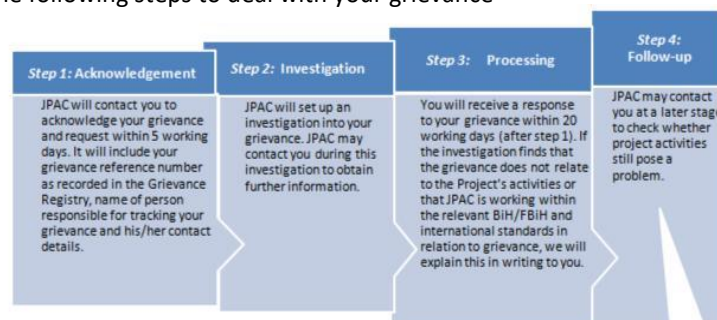
#### Contact details:

Motorways of the Federation of Bosnia and Herzegovina  
Community Liaison Expert  
Address: Adema Buća 20, 88000 Mostar  
Tel: +387 36 512 352  
e-mail: [prituze@jpautoceste.ba](mailto:prituze@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





# ANNEX 3 - Flowchart for Processing Grievances

