

CATEGORY A PROJECT
Bosnia and Herzegovina Corridor Vc in FBiH – part 3
(Tranche II)



VOLUME 6:

Stakeholder Engagement Plan for Sub-Section
Mostar South Interchange to Tunnel Kvanj

Updated: September 2025

Table of Contents

1	INTRODUCTION	4
1.1	Description and the Context of the Project	4
1.2	Objectives and Scope of the Stakeholder Engagement Plan	7
2	REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT	8
2.1	Local Legislation Requirements	8
2.2	EBRD Requirements	9
3	PREVIOUS STAKEHOLDER ENGAGEMENT	10
4	STAKEHOLDER ENGAGEMENT PROGRAM	17
4.1	Introduction.....	17
4.2	Responsibility for SEP Implementation	17
4.3	Available Communication Tools & Resources	18
4.4	Planned Information and Communication Arrangements	18
4.5	Identified Stakeholders and Specific Communication Requirements	24
5	GRIEVANCE MANAGEMENT	31
6	MONITORING AND REPORTING	34
ANNEXES		35
A.	Public Grievance Form.....	36
B.	Text for the Public Grievance Leaflet	37
C.	Flowchart for Processing Grievances.....	39
D.	Example of complaints register	40

List of Figures

<i>Figure 1: LOTs of Corridor Vc in Bosnia and Herzegovina</i>	<i>4</i>
<i>Figure 2: Mostar South Interchange and the first part of the section passing near the airport in Gnojnice Donje and the auxiliary airport runway in Ortijes.....</i>	<i>5</i>
<i>Figure 3: Part of the section passing near the auxiliary airport runway in Kosor and passing the Buna River by Buna Bridge</i>	<i>6</i>
<i>Figure 4: Part of the section passing through a tunnel and crossing the Bunica River before entering into Tunnel Kvanj in Hodbina</i>	<i>6</i>
<i>Figure 5: Scheme with PIU members responsibilities for processing the grievances</i>	<i>18</i>

List of Tables

<i>Table 1: Summary of Stakeholder Engagement and Disclosure Requirements</i>	<i>21</i>
<i>Table 2: Stakeholder Analysis and Communication Requirements</i>	<i>25</i>

Abbreviations

BiH	Bosnia and Herzegovina
EBRD	European Bank for Reconstruction and Development
EBRD ESP	EBRD's Environmental and Social Policy
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
FBiH	Federation of Bosnia and Herzegovina
FMET	Federal Ministry of Environment and Tourism
JPAC	Motorways of the Federation of Bosnia and Herzegovina
LALRP	Land Acquisition and Livelihood Restoration Plan
LC	Local Community
NGO	Non-governmental Organisation
NTS	Non-Technical Summary
PAP	Project Affected People
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan

1 INTRODUCTION

1.1 Description and the Context of the Project

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.

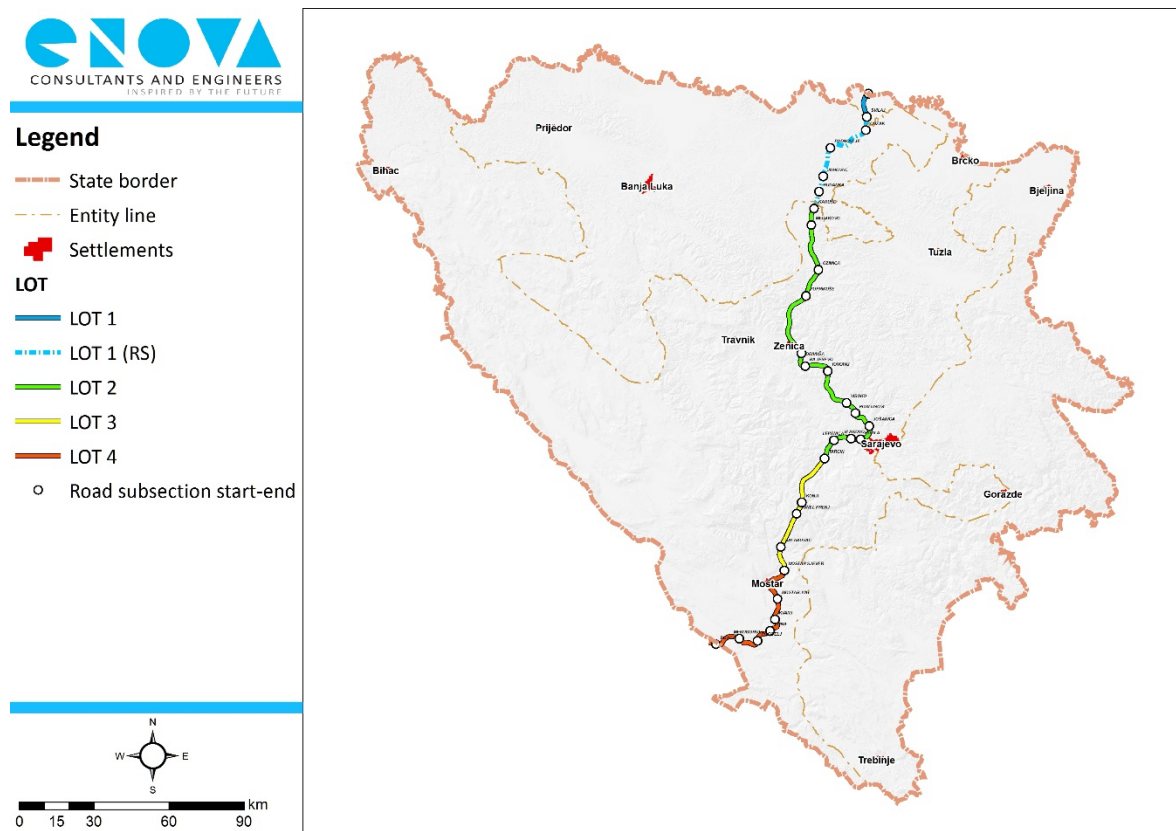


Figure 1: LOTs of Corridor Vc in Bosnia and Herzegovina

The European Bank for Reconstruction and Development (“EBRD”) approved financial support to JPAC for the construction of the new approx. **9.08 km¹ motorway section from Mostar South Interchange to Tunnel Kvanj** on the Corridor Vc (LOT 4).

¹ The length of the section in the ToR is 9.075 km. Interchange Mostar South is now part of the previous section Mostar North – Mostar South.

Brief Description of the Project

According to the Preliminary Design², the 9.08 km long subsection Mostar South-Tunnel Kvanj is the northern part of the Section Mostar South-Buna.

The subsection begins after the Mostar South interchange and ends with the entrance into Tunnel Kvanj. The interchange is located near the Mostar Airport, and represents the intersection of the motorway with the existing main road M6.1 by connecting the motorway with the southern part of Mostar. After the interchange, the alignment is located in the immediate vicinity of the Mostar Airport where a tunnel (Mostar South Tunnel L= 232m) beneath the airport is envisaged to accommodate the development of an additional runway. After exiting this tunnel, the alignment follows the existing railway Mostar-Capljina in a very narrow 32m corridor to the South. The route then passes parallel with the Mostar Airport runway towards Ortijes and Kosor settlements. The alignment then follows the auxiliary airport runway at a distance of 35-45m, crossing agricultural fields in Ortijes (Figure 2).



Figure 2: Mostar South Interchange and the first part of the section passing near the airport in Gnojnice Donje and the auxiliary airport runway in Ortijes

The subsection further crosses the Buna River by Buna Bridge (L=326m), passes through agriculture areas of Malo Polje, crosses the Bunica River with a bridge (L=211m), and a viaduct (Viaduct Brijeg L=258 m) which leads to the Hodbina Hill and further to the entrance of Tunnel Kvanj³. The subsection ends at chainage 9+125+000 km. This part of the section is shown in Figure 3 and Figure 4, where the bridges and viaduct are coloured in yellow. The part of the section from Buna River to the entrance into Tunnel Kvanj has an inclination of 5%, and a lane for slow driving (L=2465m) is foreseen.

² Preliminary Design and Study for Obtaining Urban Permit for the Motorway Section on Corridor Vc, Mostar South-Buna, developed in April 2018 by IPSA Institute Sarajevo

³ Tunnel Kvanj is not part of the subsection Mostar South-Tunnel Kvanj



Figure 3: Part of the section passing near the auxiliary airport runway in Kosor and passing the Buna River by Buna Bridge

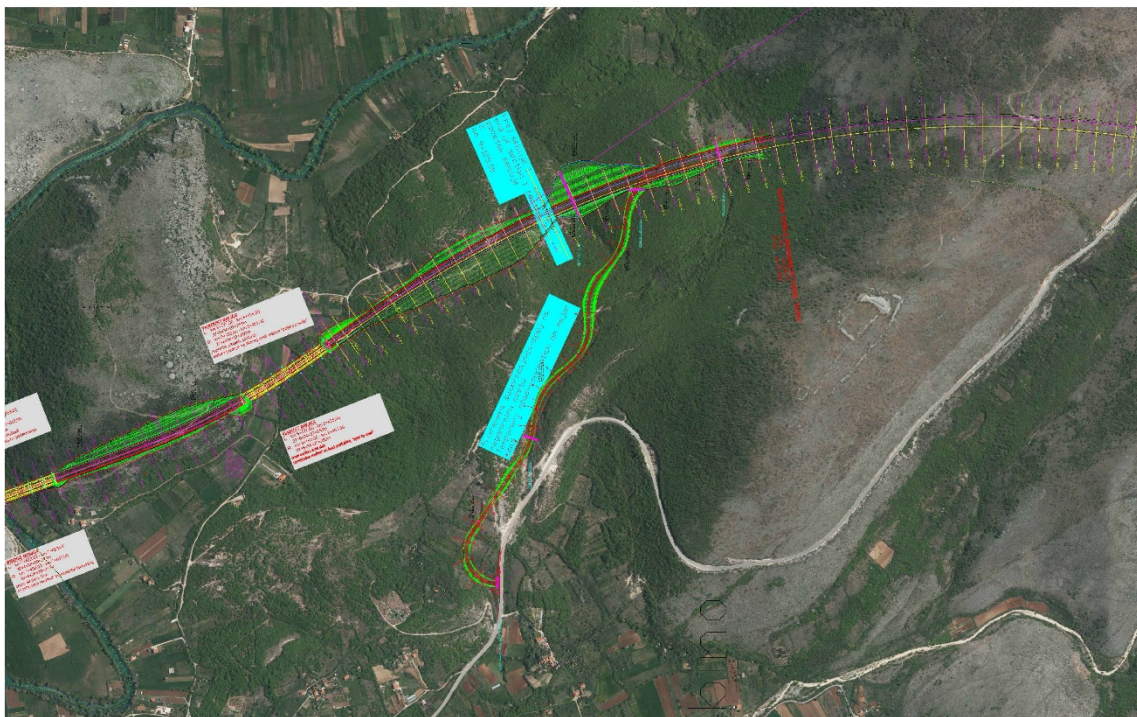


Figure 4: Part of the section passing through a tunnel and crossing the Bunica River before entering into Tunnel Kvanj in Hodbina

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 9.08 km motorway section from Mostar South Interchange to Tunnel Kvanj has been screened as a Category A project in line with EBRD's Environmental and Social Policy (2014)⁴.

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 EBRD.

This SEP will be updated as necessary.

This update was prepared in September 2025.

⁴ According to EBRD, a project is categorised A when it may result in potentially significant adverse future environmental and/or social impacts and therefore requires an environmental and social impact assessment.

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*⁵, 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*⁶, 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*⁷ 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 consideration⁸.

In line with the *Decree on Single Methodology for Developing Spatial Planning Documents*⁹, **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*¹⁰, 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:

⁵ Official Gazette of FBiH, No. 32/01

⁶ Official Gazette of BiH, No. 81/08

⁷ Official Gazette of FBiH, No. 33/03 and 38/09

⁸ For this Project, the local EIA Study was developed in 2017. This EIA Study was submitted to the Federal Ministry of Environment and Tourism (FMET) together with the request for an EP. However, JPAC agreed with FMET to make amendments to EIA Study by adding additional assessments in line with EBRD requirements since it was decided that EBRD will finance the section Mostar South-Tunnel Kvanj. The amended local EIA Study will be developed under this Assignment and submitted to FMET in July 2020.

⁹ Official Gazette of FBiH No. 63/04, 50/07 and 84/10

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

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

2.2 EBRD Requirements

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (*Information Disclosure and Stakeholder Engagement*) of EBRD's Environmental and Social Policy (ESP) 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 PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

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

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

In line the EBRD's Access to Information Policy (AIP) (2019) EBRD 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 EBRD standards, the Bank requires that Projects comply with its Environmental and Social Policy. In addition, the Bank is required to disclose certain Project information to the public in accordance with its Access to Information Policy, to enhance transparency and accountability, improve discourse with affected stakeholders, and foster good governance. Furthermore, the Independent Project Accountability Mechanism (IPAM) <https://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-evolution.html> of EBRD 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 ESP and the Project-specific provisions of its AIP. For "Category A" projects, the AIP in addition to the disclosure required of the clients under the ESP, the Bank will make available environmental and social impact assessments on the EBRD website in its Headquarters in London and in the relevant EBRD Resident Office a minimum of 120 calendar days prior to Board consideration for public sector projects.

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 4 Mostar North - South border section. 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 Mostar and Capljina (LOT 4). No significant public complaints had been recorded in respect to environmental and social issues on the project section. However, only Environmental Permit (EP) for the sections Pocitelj-Zvirovici, Zvirovici-Kravice and Kravice-Bijaca was issued based on the EIA Study for LOT 4. In addition, recently the EP for sections Tunel Kvanj-Buna and Buna-Pocitelj was issued. EP was not issued for the sections Mostar North-Mostar South and Mostar South-Tunnel Kvanj.

JPAC initiated the environmental permitting procedure for the whole section Mostar South-Buna by preparing the EIA Study. JPAC agreed with FMET to amend the EIA Study for the subsection Mostar South-Tunnel Kvanj in line with the EBRD requirements since it was later decided that EBRD will finance this section. The legally mandatory public hearing for local EIA has been organised in September 2020.

Public consultations and stakeholder engagement as part of the ESIA preparation and disclosure

Prior to the public consultation meeting the following stakeholder engagement activities were carried out:

- The ESIA Study for this sub-section prepared by the Consultant ENOVA d.o.o Sarajevo has been publicly disclosed:
 - a. on the web page of JPAC on 21.07.2020 <https://www.jpautoceste.ba/objava-studije-utjecaja-na-okolis-za-poddionicu-autoceste-na-koridoru-vc-mostar-jug-tunel-kvanj-92-km/>
 - b. on the web page of the Ministry on 29.7.2020 <https://www.fmoit.gov.ba/bs/okolisne-dozvole/javne-rasprave-i-javni-uvidi/javni-uvid-u-studiju-o-procjeni-utjecaja-na-okolis-za-investitora-jp-ceste-federacije-bih-za-dionicu-mostar-jug-tunel-kvanj-u-duljini-9-2-km>
 - c. on the web page of EBRD on 21.07.2020 <https://www.ebrd.com/work-with-us/projects/esia/corridor-vc-in-fbh-part-3.html>
- The hard copies of the ESIA Study were made available on the following locations:
 - a. JPAC office in Mostar and Sarajevo
 - b. Mostar City Hall
 - c. Local communities MZ Gnojnice, MZ Blagaj and MZ Buna
 - d. Administrative building of the Federal Ministry of Environment and Tourism in Sarajevo

The organisation of the public consultation meeting has been announced:

1. on the web page of the Ministry on 28.8.2020. <https://www.fmoit.gov.ba/bs/okolisne-dozvole/javne-rasprave-i-javni-uvidi/javna-rasprava-jp-autoceste-federacije-dionica-autoputa-mostar-jug-tunel-kvanj>.
2. in local newspapers Dnevni Avaz and Dnevni list on 28.08.2020 (see Annex 1).

The public consultation meeting was organised on 14 September 2020 in the Mostar City Hall. The meeting was organised by the Federal Ministry of Environment and Tourism in the framework of local environmental impact assessment procedure defined by the Law on Environmental Protection (Official Gazette of FBiH no 33/03, 38/09). The consultant prepared PowerPoint presentation and presented the ESIA study.

The recommendations of the public health institutions enforced at the time related to organisation of public gatherings in closed spaces due to COVID19 were followed. The meeting participation was limited to 50 participants, with possibility to organise another meeting in case of great interest. According to the participants list, the number of participants was 50. All participants were wearing masks and hand sanitisers were available. Participation via private video link was also enabled for those participants that could not join but had their colleagues at the meeting.

Following the public consultation meeting, the Ministry has prepared the minutes of the meeting in line with entity legislative requirements. The Minutes were publicly disclosed on the web page of the Ministry <https://www.fmoit.gov.ba/bs/okolisne-dozvole/javne-rasprave-i-javni-uvidi/javni-uvid-u-zapisnik-sa-odrzane-javne-rasprave-14-09-2020-za-investitora-jp-autoceste-fbih-za-dionicu-mostar-jug-tunel-kvanj>.

The Ministry received 5 written public comments on the ESIA study in November 2020 and 2 written public comments on the revised ESIA in December 2020.

Additionally, in line with the EIA procedure described in the Law on Environmental Protection, the Ministry engaged 5 independent experts to review and evaluate the Study. The experts prepared individual *Reports on Acceptability of the ESIA Study* pointing out to issues that needs to be described in more details and giving their positive recommendation to the Ministry to accept the Study and issue environmental permit for this sub-section. The reports are available on the following link:

<https://www.dropbox.com/sh/u4b5bvrkdcz51h4/AADcWoM3wR3RIAjuKQFKqzuza?dl=0>.

Environmental Permit was issued on February 17th 2021 by the Federal Ministry of Environment and Tourism. A lawsuit was initiated by a landowner in Malo Polje that challenged the Decision on the environmental permit. The lawsuit was rejected by the court and thus the environmental permit for the section Mostar South - Tunnel Kvanj became final on November 18th 2021.

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.

Presentation of the section Mostar South-Tunnel Kvanj in Blagaj

In January 2017, JPAC organised a presentation of the section route in Blagaj by JPAC. The local community expressed their concerns about impacts on ecology in the southern zone of Mostar, to settlements and agricultural land particularly orchards and vineyards. In addition, according to representatives of local communities, the proposed motorway section will negatively impact the environment and in particular it will destroy natural resources in the valley of Malo Polje. JPAC representatives explained that the chosen route was the most cost-effective and that all affected people would be properly compensated. Even if the cost was the primarily criteria chosen for the public presentation, the multicriteria analyses for the motorway section on Corridor Vc Mostar North-Buna took into consideration other criteria: eliminatory criteria (water supply sites - zone I, cultural and historical heritage (facilities and zones defined by decisions and planning documents), natural values and rarities (based on valid documents), urban structures, built industrial complexes, significant energy facilities, land of I category, amelioration), spatial-economic criteria, and spatial-ecological criteria.

Consultations with land owners/users during the land acquisition procedure

Individual hearings with PAPs

The expropriation process was initiated by JPAC by submitting a proposal for expropriation to the City of Mostar as the expropriation authority. The proposal was submitted on January 29, 2019. The City of Mostar notified the project affected persons (PAP) of the submitted proposals for expropriation. The proposal contained data on property for which expropriation was proposed, the owners of such property and the purpose for which expropriation was proposed.

During the land acquisition process, the City of Mostar convened and held individual hearings with PAP to determine the status of ownership and the compensation for the property through agreements. Minutes of all meetings were prepared. In addition, independent court experts for valuation of property (agricultural experts and construction experts) have started valuation of the existing state of land plots and assets on land in line with the provisions of the *Law on Expropriation*.

Socio-economic survey (2019)

A socio-economic survey was also conducted to solicit the opinions of the PAP about Project impacts and compensation arrangements, as well as to obtain specific data on current livelihoods and living conditions of PAP, including the identification of vulnerable categories. The survey was initially conducted during individual hearings with PAP in the period April-May 2019 by the representatives of the Department of Property and Legal Affairs of JPAC (Mostar). During this period, out of 231 PAP in total, 92 PAP were surveyed, whereas 18 PAP did not wish to be surveyed. An additional survey was organised during the development of the Land Acquisition and Livelihood Restoration Plan (LALRP) in November 2019 in order to attempt to interview the remaining 121 PAP. Only 4 PAP were present in the field at the time of the survey. Interviews were carried out with 2 affected PAP, while the other 2 did not wish to be surveyed.

Consultations with relevant government authorities, ministries and public institutions

JPAC consulted several local government authorities and public institutions during the development of the Preliminary Design document. JPAC organised several meetings with BiH Air Navigation Services Agency (BHANSNA), BiH Civil Aviation Directorate (BHDCA), Mostar Airport and Ministry of Defence of BiH in order to define the exact position of the section road in the area of Mostar Airport, in order to avoid any disturbance to daily activities of the Airport during construction and operation phase.

In addition, JPAC contacted other institutions for the purpose of obtaining initial permits necessary for the issuance of the Urban Permit, such as: Adriatic Sea Basin District Agency, BH-Gas Ltd, Railways FBiH, Public Enterprise Elektroprivreda HZHB and Elektroprenos BH.

Consultations with the settlements Malo Polje and Kosor (2019)

The residents of Malo Polje and Kosor¹¹ requested from JPAC to invest to the local community projects as a compensation for the negative impacts of the motorway. A vast majority of the requests of the local residents of Malo Polje and Kosor have been included in the tender documentation, thus ensuring that the local community projects will be implemented, except for the reconstruction of the bridge 'Lehina cuprija' which is a historical monument and must be reconstructed under specific conditions for reconstruction of cultural heritage sites. Community investment projects for motorway section Mostar South – Tunnel Kvanj are listed in the table below. Projects that were included are the projects that have direct impact from the motorway construction activities.

No.	Community investment projects for motorway section Mostar South – Tunnel Kvanj	
	<i>1. Projects in LC Kosor</i>	
1.	Road No.6	Reconstruction of the local road from the entrance to Blagaj to the separation for below Petak, approx.2730m long, 6m wide. - new asphalt, - construction of curbs and sidewalks on one side of the road over the entire length of the road 1.5m wide, - water pipe along the main route, - rain water drainage from the road, - lighting.
2.	Road No.7	L=1734m, w=3,5m - new asphalt, - shoulder making.
3.	Road No.8	L=435m, w=3,5m - new asphalt, - shoulder making.
	<i>2. Projects in LC Malo Polje</i>	
4.	Road No.9	Construction of a new two-way bridge over the Buna River along the motorway bridge with the construction of connecting roads for the connection to the local road Malo Polje - road No.10 and the connection to the local road Kosor - road No.7.
5.	Road No.10	Road from Cathedral Church to Roman Bridge L = 3540m - water pipe along the main route, - rain water drainage from the road, - full length asphalt paving 6m wide with the curbs,

¹¹ Request from local communities Kosor and Malo Polje, Municipality of Mostar, prepared on 03.05.2019 and received by JPAC 07.05.2019. Request filed under number 05-1807/19. Agreed requests of local communities were sent through the City of Mostar on 18.03.2020 under number 02-19-3969/20 and received by JPAC 25.03.2020

		- construction of sidewalks on one side of the road over the entire length of the main road 1.5m wide, - lighting, - retaining wall L=40m and guardrails, - water discharges: „Viričak“, „Orah“, „Hadžajlovina“, „Rimski most“.
6.	Road No.11	Road Bukvica – Pećine - Malo Polje - Brutak L=4950m - preparatory and earthworks, - 3,5 wide paving, - shoulders.
7.	Road No.12	Lukovac - Kaporova luka – Bočine - Podgorica L=2430m - preparatory and earthworks, - 3,5 wide paving, - shoulders.
8.	Road No.13	Paving the road to the mosque L=180m. Coast fortification of the river Buna from the muslim cemetery to Lukovac approx. 200m.

Consultations and requests from LC Blagaj and LC Kosor (2021)

On **11 February 2021**, at the invitation of the representative of LC Blagaj in the Assembly of the Herzegovina-Neretva Canton, JPAC organized a meeting and presentation of the project. It was presented at the meeting that the specific requirements of the local community are already included in the tender documentation. Representatives of the local community expressed their full support to the project.

Furthermore, Letters of support have been received from the following stakeholders:

- representatives of the business sector and associations from LC Blagaj – Letter dated 16.02.2021 and
- Malo Polje Youth Association, on behalf of LC Kosor and settlement Malo Polje – Letter dated 17.02.2021.

Consultations and meeting with representatives of Serb returnees, LC Ortijes

A meeting was held on **18 February 2021** with representatives of the Serbs of the City of Mostar and the local community of Ortijes / Laksevine. Representatives of Serb returnees Mostar, and representatives of the LC Ortijes / Laksevine as well as the lead political representative of the Serb community in the City Council expressed the support to the project Mostar South - Kvanj Tunnel.

It was pointed out at the meeting that this stakeholder group initially opposed the project as they had concerns related to compensation for the land take. Experience of the project affected people with land expropriation process and fair compensation received, at full replacement cost, helped to eliminate further concerns of this stakeholder group.

The stakeholder group has been informed that all roads which will be used by the contractor will be repaired. In addition, the stakeholders were informed about community projects associated with the motorway.

Consultations with the City of Mostar (2021)

The meetings were held on **19 March and 7 April 2021**. The representatives of the City of Mostar have communicated three additional requests for the construction of local infrastructure, i.e., rehabilitation of connecting roads along the main road M17 in the settlement of Ortiješ; reconstruction of the local road Buna - Kosor, and improvements to the local infrastructure in Ortiješ.

The City Mayor expressed full support for the project on behalf of the City of Mostar. As the newly elected Mayor, JPAC informed the Mayor about the details of the project, progress with land expropriation and operational issues on the project.

Consultation with non-governmental organization (NGOs) Bankwatch (2021)

A meeting was held on **22 and 24 June 2021** between JPAC and Bankwatch (BW) to request access to information by BW, such as more detailed maps of the Corridor Vc. Land expropriation process and progress of completion of the land expropriation has been discussed and information provided to BW. The interested party also inquired about the route selection and related spatial planning documentation. Specific details regarding key mitigation measures for aquatic ecosystems have been clarified to BW during the meeting, as well as how JPAC interacts with other stakeholders.

Additional consultative meeting with representatives of Serb returnees, Ortijes

The new management of JP Autoceste held meetings with representatives of this stakeholder group on **16 July 2021**. It was concluded at the meeting that the demands and concerns of local communities will be channeled through the City of Mostar, led by the newly elected Mayor.

Stakeholder consultations as part of Route Environmental and Social Sensitivity Mapping (2024)

In 2024, Consultant Arup carried out the Route Environmental and Social Sensitivity Mapping (RESSM). This assignment was initiated in response to concerns raised by the Requestors from Malo Polje about the project's environmental, economic, and cultural impacts, as highlighted in the 2020 request submitted to Project Complaint Mechanism, registered under case number 2020/06. In order to address Independent Project Accountability Mechanism's Recommendation 1 and Management Action Plan (Action 2), RESSM was carried out to, guided by the ESIA and other existing project documentation, with the aim of conducting a thorough assessment to identify and document sensitive E&S receptors, mapping their locations, and creating a register of all (previously and newly identified) mitigation measures and identifying any additional stakeholder engagement activities required.

Engaging with stakeholders was crucial to understanding social sensitivities, vulnerability and gathering insights on potential impacts and whether proposed E&S mitigation measures in the project ESIA (2020) are considered as adequate and if these should be supplemented with additional mitigation measures to address concerns of the stakeholders. The stakeholder consultations were carried out in the period between **28th May and 1st June** and involved the following activities:

- consultations with JPAC representatives: engagement with representatives from JPAC to discuss project implementation, land acquisition processes and the current status of the process of Contractor selection,
- consultations with people affected by the land acquisition along the alignment (in Gnojnice, Ortijes, Kosor, Blagaj, Malo Polje, Hodbina): interviews with individuals directly impacted by the land acquisition, gathering their perspectives on compensation received, resettlement, consultations, and any concerns, including the need for additional stakeholder engagement and consultations,
- consultations with indirectly affected community members (in Gnojnice, Ortijes, Kosor, Blagaj, Malo Polje, Brijeg): engaged with community members who, while not directly affected by the land acquisition, may experience indirect impacts such as changes in the traffic patterns, noise, and access

to resources, to understand their views and concerns and identify the need for any additional stakeholder engagement and consultations.

Based on the feedback gathered during the stakeholder consultations, the review of project ESIA and other previously developed documentation and the site walkover, Arup has identified additional stakeholder engagement activities that are reflected in this Updated Stakeholder Engagement Plan (please see Chapter 3.4).

Public presentation of additional studies conducted for the Mostar South – Kvanj Tunnel motorway section (2024)

On 29 October 2024, a public presentation of the additional studies conducted for the Mostar South –Tunnel Kvanj motorway section was held at the Dom kulture Blagaj. The additional studies were carried out as part of the Management Action Plan (MAP) for this motorway section, according to which the EBRD, together with JPAC, committed to carrying them out in order to reassess the impacts and determine the presence of any new sensitive receptors and to consider additional mitigation measures for the project. The meeting was attended by representatives of the EBRD (5), JPAC (7), consultants who worked on the preparation of the additional studies (Arup (4) and Enova (2)), representatives of non-governmental organizations (Ekodvogled (3) and Bankwatch (1)), representatives of the City of Mostar (3), representatives of the City Council (2), interested citizens in person (46) and interested parties via video link (12), and one representative of Mostar Airport.

On this occasion, the following documentation was presented:

- Presentation of Road Alignment Selection Process and a Review of the Mitigation Measures;
- Presentation of Route Environmental and Social Sensitivity Mapping (RESSM); including Updated Stakeholder Engagement Plan (SEP);
- Presentation of Updated Biodiversity Management Plan (BMP).

Following the presentations, attendees had the opportunity to ask questions related to the topics presented. The documents were publicly available from 8 October 2024 in local and English on the JPAC and EBRD websites.

All comments raised during the meeting including those submitted in written after the meeting were addressed. **Updated version of RSM was prepared (December 2024) and re-disclosed on JPAC and EBRD websites¹².**

Protective archaeological research and relocation of tombstones on the Mostar South –Tunnel Kvanj motorway section carried out in cooperation with the Federal Ministry of Culture and Sports (2024/2025)

In October and November 2022, JP Autoceste, in cooperation with the Federal Ministry of Culture and Sports, carried out preventive archaeological research on the Mostar South –Tunnel Kvanj motorway section as part of its regular procedure. Namely, Federal Ministry of Culture and Sports issued an expert opinion after the completion of preliminary design, that preliminary archeological research must be conducted on the project area. The elaborate on the conducted research determined that there is a necropolis with tombstones on the motorway route in the settlement of Suho Polje, and recommended that the necropolis should be relocated, which was done in line with this expert opinion of the Ministry and ESAP PR 8 prepared for this project. The competent ministry (FMCS) hired a company to carry out these works, and the

¹² Updated version of RSM can be found on the following link: chrome-extension://efaidnbmninnibpcapjpcglclefindmkaj/https://www.jpautoceste.ba/wp-content/uploads/2025/02/2024-12-11-Updated-RSSM-Report-FINAL_public-disclosure_final_ENG_clean.pdf

tombstones (3 tombstones) from the aforementioned site were relocated to another location in the settlement of Malo Polje, Mostar, in agreement with the local community, for which the contractor prepared a study and submitted it to the competent ministry. The relocation of the tombstones took place in January 2025. STAKEHOLDER ENGAGEMENT PROGRAM

3.1 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.

3.2 Responsibility for SEP Implementation

A Project Implementation Unit (PIU) for this motorway section was updated in November 2022¹³, which will be responsible for Project implementation, including the implementation of this SEP, under the supervision of the Lender. The PIU consists of 8 members. A Senior Expert Associate for Site Level Management and Communication with Local Communities has been appointed at corporate level (within the Design and Documentation Division – Department for Study Documentation, Social and Environmental Policy – Section for study documentation) with the aim to implement all activities related to stakeholders' engagement¹⁴. This person is a member of the PIU and will be the responsible person for the implementation of this SEP during the entire Project cycle, and in charge of communicating with the communities. The Compensation and Resettlement Coordinator will act as a contact person for enquiries and grievances (see contact information in Chapter 4 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.

All contractors in charge of carrying out specific Project activities had been required to implement the relevant provisions of SEP (see Chapter 4 for more details). The grievance mechanism requirements had been laid out in the tender documentation and contracts that were signed with the contractors.

¹³ JPAC Decision on Appointment of the PIU for the Construction of Motorway on Corridor Vc, Section Mostar South-Buna, Subsection Mostar South-Tunnel Kvanj (November 30, 2022)

¹⁴ Provision of information to stakeholders about the program of works, future activities, potential impacts, and mitigation and management measures; monitoring the effectiveness of stakeholder engagement activities; responsible for the stakeholder database and for managing grievances; etc.

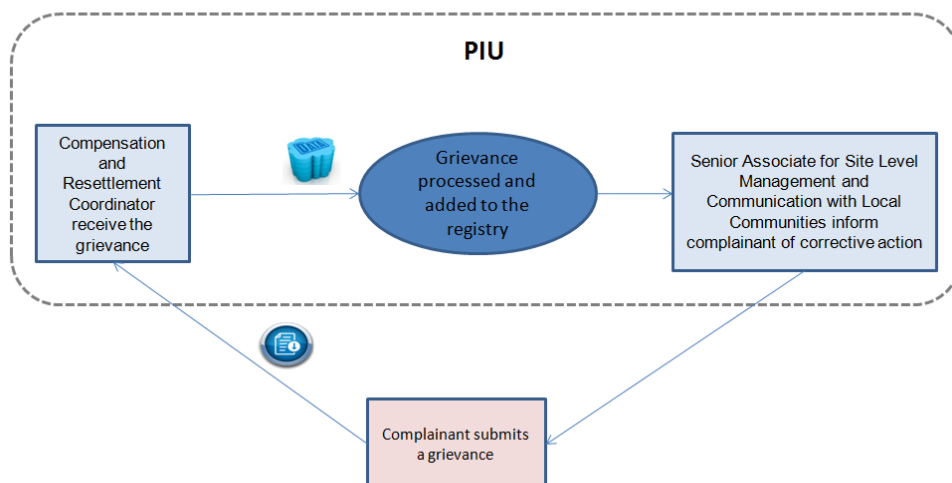


Figure 5: Scheme with PIU members responsibilities for processing the grievances

3.3 Available Communication Tools & Resources

JPAC communicates with the public through its website (www.jpautoceste.ba) and its Facebook page, as well as electronic, digital and printed media (TV, newspapers, radio, online media). The website is updated regularly and contains 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 4 for more details).

3.4 Planned Information and Communication Arrangements

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

Documents and information disclosure

JPAC will keep the following Project disclosure package available in the public domain throughout all stages of project implementation:

- This **Updated Stakeholder Engagement Plan (SEP)** as well as all previous versions of the SEP updates;
- **Environmental and Social Impact Assessment (ESIA)** including **Environmental and Social Management Plan (ESMP)**;

- **Local EIA study**, based on which the Environmental Permit will be issued by the Federal Ministry of Environment and Tourism for this Project¹⁵;
- **Public Grievance Form (Annex A)** and **Public Grievance Leaflet (Annex B)**;
- **Non-technical Summary** of the environmental and social assessment of the Project;
- **Updated Biodiversity Management Plan (BMP)**;
- **Land Acquisition and Livelihood Restoration Plan (LALRP)**;
- **Environmental and Social Action Plan (ESAP)**.

The disclosure package are publicly available in the local language (as well as English where available) immediately upon its availability, on the JPAC's website (www.jpautoceste.ba), the City of Mostar official website (www.mostar.ba) and the EBRD website (www.ebrd.com).

The ESIA disclosure package remained disclosed on the websites of JPAC, the City of Mostar and EBRD during a period of 120 calendar days prior to the consideration of the Project by the EBRD's Board of Directors and will remain publicly available throughout the life of the Project.

In addition, hard copies of the documents will be available at the following locations¹⁶:

1. JPAC office in Mostar, Adema Buća 20, 88 000 Mostar
2. JPAC office in Sarajevo, Hamdije Kreševljakovića 19, 71000 Sarajevo
3. City of Mostar, Hrvatskih branitelja 2, 88000 Mostar
4. EBRD office in Sarajevo, Fra Anđela Zvizdovića 1, 71000 Sarajevo
5. LC Buna, LC Blagaj and LC Gnojnice Donje in the premises of Local Community Offices

Additionally, JPAC has publicly disclosed the following two additional deliverables that were prepared in 2024:

- **Land Acquisition and Livelihood Restoration Close -Out Audit, Mostar South - Tunnel Kvanj - Buna (May, 2024);¹⁷**
- **Route Environmental and Social Sensitivity Mapping report (September, 2024).**

In addition to the above-mentioned documents, after collecting the data, JPAC updated and publicly disclosed the document:

- **Updated Route Environmental and Social Sensitivity Mapping report (December, 2025).**

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 website of the City,

¹⁵ The local EIA Study is not identical to the English version ESIA. The two documents are same in essence, but they are not identical in how the chapters are presented due to the rigid requirements of FBiH legislation regarding the content of the ESIA.

¹⁶ The premises of JPAC in Mostar and Sarajevo and of the City of Mostar have not been closed during COVID and expect to remain open in the upcoming period, subject to national COVID restrictions. The EBRD premises in Sarajevo have been closed during COVID and expect to remain close in the upcoming period. However, a hard copy of disclosure package will be kept at the reception of the building where EBRD premises are located (Fra Anđela Zvizdovića 1, 71000 Sarajevo). In addition, a written notification will be posted at a visible place at the entrance of EBRD offices indicating that the hard copy of the disclosure package is available at the reception and contact details for sending request for receiving electronic version of the documents.

¹⁷ The draft of this report has been available for 30 days to all Interested stakeholders for commenting. Final version was redisclosed upon finalization of the report.

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

All available Project information and documents have been 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 presented the project footprint, the expected impacts and planned mitigation measures, and received 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 were also shared.

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

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

Additional public disclosure of the documentation that has been prepared in 2024 was undertaken. Route Sensitivity Mapping document and Updated Biodiversity Management Plan were disclosed and new findings on E&S sensitivities and mitigation measures were presented at community meeting. The meeting was organised in October 2024.

During construction phase, monthly meetings between the representatives of the Investor, the contractors and the elected representatives of the local community on grievance management will be held regularly. The practice of holding regular monthly meetings has shown successful in maintaining the stakeholders engaged on other motorway sections. At the meetings, the local community representative will be able to express their concerns and discuss solutions.

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

Alternative approaches with COVID-19 or similar restrictions

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 1](#) 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 1](#) below.

Table 1: 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 City of Mostar:</p> <ul style="list-style-type: none"> • This SEP, • Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management Plan (ESMP), • Local EIA Study, • Public Grievance Form and Public Grievance Leaflet, • Non-technical Summary of the environmental and social assessment of the Project, • Environmental and Social Action Plan, • Biodiversity Management Plan (BMP), • Land Acquisition and Livelihood Restoration Plan (LALRP). <p>Print and keep hard copies of documents at premises of JPAC (both Mostar and Sarajevo offices) and the City of Mostar.</p>	<p>All available Project information and documents are disclosed to the public:</p> <p>https://www.jpautoceste.ba/en/environmental-and-social-document/</p> <p>https://www.jpautoceste.ba/en/documentation-regarding-the-requirements-of-european-bank-for-reconstruction-and-development-ebd/</p> <p>The disclosure package is publicly disclosed on the website of the JPAC, City and EBRD during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors and will remain publicly available throughout the life of the Project.</p>	<p>PIU/ Senior Associate for Site Level Management and Communication with Local Communities and the City of Mostar</p>

No.	Activity	Timing/further detail	Responsibility
2	<p>Organise at least one public consultation meeting during Project preparation (but prior to the start of construction works) <i>(In case of COVID-19 restrictions online public presentation will be organised)</i></p> <p>Encourage written proposals and comments</p> <p>Provide timely access to the documents before the meeting (at least 2 weeks in advance)</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 City of Mostar, as well as local media	PIU/ Senior Associate for Site Level Management and Communication with Local Communities
3	Organise individual consultation meetings <i>(In case of COVID-19 restrictions, online and telephone consultations will replace individual meetings)</i>	As needed or requested by the JPAC, City or by any identified stakeholder groups/individuals	PIU/ Senior Associate for Site Level Management and Communication with Local Communities
4	Document all opinions, remarks and possible solutions with regard to the Project raised by stakeholders during consultation meetings, and address appropriately	Ongoing	PIU/ Senior Associate for Site Level Management and Communication with Local Communities
5	<p>Ensure that the following Project documents are publicly disclosed on the websites of JPAC:</p> <ul style="list-style-type: none"> Updated Stakeholder Engagement Plan Updated Biodiversity Management Plan Route Environmental and Social Sensitivity Mapping 	Q3 2024	PIU/ Senior Associate for Site Level Management and Communication with Local Communities

No.	Activity	Timing/further detail	Responsibility
6	<p>Organise local community meeting to present the findings of the:</p> <ul style="list-style-type: none"> Updated Stakeholder Engagement Plan Updated Biodiversity Management Plan Route Environmental and Social Sensitivity Mapping <p>Stakeholders will be presented with structured information about the project timeline, alignment and the summary of impacts</p>	<p>Q4 2024</p> <p>Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least 15 days in advance, through the websites of the JPAC and local media</p>	PIU/ Senior Associate for Site Level Management and Communication with Local Communities
7	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)	Two weeks prior to the start of construction works	PIU/ Senior Associate for Site Level Management and Communication with Local Communities and the City of Mostar
8	Publicise information about Project progress on JPAC website.	Periodically	PIU
9	Organise awareness raising activities for the students of the Blagaj elementary school to inform them about the health and safety risks associated with the project	Prior to the start of construction works and annually afterwards	PIU/ Senior Associate for Site Level Management and Communication with Local Communities
10	Consult the local communities on their development needs that are feasible to be implemented as part of the voluntary Agreement on Friendly Environment	In advance of the Agreement on Friendly Environment development	PIU/ Senior Associate for Site Level Management and Communication with Local Communities

No.	Activity	Timing/further detail	Responsibility
11	Carry out monthly meetings with the elected local community representatives on grievance management and concern	Throughout the construction phase	PIU/ Senior Associate for Site Level Management and Communication with Local Communities, Prospective Contractor's CLO

3.5 Identified Stakeholders and Specific Communication Requirements

A list of identified stakeholders and specific communication requirements are provided in [Table 2](#) below. The specific communication requirements are in line with the EBRD briefing note on stakeholder engagement during COVID-19 restrictions.

Table 2: 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 in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
<p>Project Affected People</p> <p>Land owners/users who will be directly affected by land acquisition in the following Cadastre Municipalities:</p> <ul style="list-style-type: none"> Gnojnice Donje (beginning of section and interchange) Ortijes (section along the auxiliary airport runway) Blagaj (part of the section along the auxiliary airport runway) Kosor (part of the section along the auxiliary airport runway and crossing agricultural fields) Malo Polje (part of the section crossing the river Buna) Hodbina (entrance into Tunnel Kvanj and end of the section) 	<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"> Providing timely information on land acquisition activities. Presenting the draft LALRP and discuss all land acquisition issues and concerns. Keeping records on land plots subject to land acquisition, uses, title holders and agreements. 	<ul style="list-style-type: none"> The draft LALRP will be disclosed in local languages and English on the official website of JPAC and website of the City of Mostar The draft LALRP will also be made available at the premises of the JPAC and the City A public consultation meeting will be organised by JPAC at the premises of the City or Local Community Offices Land owners will be individually contacted and informed about the impacts of the Project on their property 	<ul style="list-style-type: none"> The draft LALRP will be disclosed in local languages and English on the official website of JPAC and website of the City of Mostar The draft LALRP will also be made available at the premises of the JPAC and the City Targeted house-to-house leaflet distribution in settlements with contact details and mechanisms for returning feedback Land owners will be individually contacted by telephone 	<ul style="list-style-type: none"> Short-term engagement may not reach vulnerable people During Covid-19, affected businesses (owners of affected land plots) may be closed which may make it difficult for JPAC to contact them. 	<ul style="list-style-type: none"> Face-to-face, one-to-one interviews and discussions Online and telephone interviews and discussions

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
<p>Local residents and businesses in the vicinity of the Project area</p> <p>The road section will be constructed in the vicinity of some of Mostar's rural settlements. These settlements are: Gnojnice, Laksevine, Ortijes, Kosor, Blagaj, Buna, Brijeg, Malo Polje, Hodbina.</p>	<p>During construction works, communities located in the vicinity of the planned construction works may experience restricted access, disturbances related to increased dust and noise due to machinery operation, and traffic safety risks.</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"> Public consultation meeting, and individual meetings as necessary 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) 	<ul style="list-style-type: none"> Publishing information on JPAC and City websites Disclosure focusing on online methods, local radio/TV/newspaper announcement Targeted house-to-house leaflet distribution in settlements with contact details and mechanisms for returning feedback Follow-up calls if contact details are available 	<p>Short-term engagement may not reach vulnerable people</p>	<ul style="list-style-type: none"> Vulnerable people identified through discussion with local authorities Face-to-face, one-to-one interviews and discussions or online and telephone interviews and discussions Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)
<p>Students of Blagaj elementary school</p> <p>The Blagaj - Malo Polje road will be used by the project machinery. The road passes by an elementary school. The school has 271 students of which 159 travel by bus from nearby villages (in particular from Malo Polje, but also from Kosor, and Pogradje).</p>	<p>During the construction works, the road will be used by the project machinery increasing traffic safety risks for elementary school students.</p>	<p>Providing timely information on health and safety risks associated with the traffic safety during construction works</p>	<ul style="list-style-type: none"> Awareness raising sessions for the elementary school students to inform them on health and safety, and especially traffic safety risks associated with the project. Publishing information on the extent, timing and duration of planned works and any expected 	<ul style="list-style-type: none"> Awareness raising sessions adapted to align with the schooling system, including the option to conduct the sessions online. 	<p>Limited hands-on learning and interactive elements</p>	<ul style="list-style-type: none"> Distribute supplementary materials, such as worksheets, videos, or interactive games, that are tailored to the students' age groups and allow for hands-on learning and engagement.

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
			disruptions and inconveniences on the bulletin boards in Local Communities (LCs)			
City and LCs: <ul style="list-style-type: none"> City of Mostar, LC Buna, Representatives of the settlement Ortijes in LC Buna LC Blagaj Representatives of the settlement Malo polje and Kosor in LC Blagaj LC Gnojnice 	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"> Official correspondence Public consultation meetings, and LCs consultation meetings as necessary 	<ul style="list-style-type: none"> Publishing information on the bulletin boards in the City and LCs Official mails and written letters 	During Covid-19, local administration and LCs offices are not always open	<ul style="list-style-type: none"> Face-to-face, one-to-one interviews and discussions Online and telephone interviews and discussions
Relevant government authorities, ministries and public institutions, including: <ul style="list-style-type: none"> Federal Ministry of Environment and Tourism Federal Ministry for Spatial Planning Federal Ministry of Culture and Sport Adriatic Sea Basin District Agency Ministry of Defence of BiH BH-Gas Ltd Railways FBiH 	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"> Official mails and written letters 	During Covid-19, may be closed with difficulties to be contacted by JPAC	<ul style="list-style-type: none"> Face-to-face, one-to-one interviews and discussions or telephone calls Online and telephone interviews and discussions

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
<ul style="list-style-type: none"> Public Enterprise Elektroprivreda HZHB Elektroprenos BH BiH Air Navigation Services Agency (BHANS), BiH Civil Aviation Directorate (BHDCA) Mostar Airport BiH Mine Action Centre Institute for the Protection of Monuments of FBiH 						
<p>Interested non-governmental organisations (NGOs)</p> <ul style="list-style-type: none"> Association of Serb Returnees Mostar, Association of Serb Returnees Ortijes, Youth Association Malo Polje Association of Farmers City of Mostar Association of Citizens of Returnees Materiz Viticultural cooperative "Mostarska žilvka" Association of Women for Rural Development "Blagaj" Mostar 	Stakeholders, who are interested in the protection of the environment and human health, are of high significance for the success of the Project.	Providing timely information, communication and consultations	<ul style="list-style-type: none"> Public consultation meetings, and individual consultation meetings as necessary Disclosure through the websites of JPAC and City of Mostar Direct email communication Local media/press releases 	<ul style="list-style-type: none"> Disclosure through the websites of JPAC and City of Mostar Disclosure focusing on online methods, local radio/TV/newspaper announcements Follow-up calls if contact details are available 	Short-term engagement may not reach all interested NGOs	<ul style="list-style-type: none"> Additional interested NGOs identified through discussion with local authorities Face-to-face, one-to-one interviews and discussions

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
<ul style="list-style-type: none"> Association of War Veterans and War Invalids of Herzegovina-Neretva Canton Association of War Veterans and War Invalids of Mostar southeast <p>Potentially interested international NGOs: All NGOs not listed above shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation.</p>						
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"> JPAC's internal communication channels Trainings as necessary 	<ul style="list-style-type: none"> Emails to all employees Virtual meeting Video messages Webinars 	<ul style="list-style-type: none"> Not all employees have email access Employees may be off sick 	<ul style="list-style-type: none"> Telephone calls Face-to-face, one-to-one discussions Online discussions
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees		Provision of Project code of conduct and work safety and health regulations, environmental protection requirements	<ul style="list-style-type: none"> Information through tender procedure and contracts Communication via supervising engineers Toolbox talks at construction sites on relevant occupational 	<ul style="list-style-type: none"> Official email or written letter Virtual meetings Webinars 		

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods (without COVID-19 restrictions in place)	Alternative approaches in case of COVID-19 restrictions or similar		
				Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term)
			health and safety topics <ul style="list-style-type: none"> • Monthly reports on progress of works to be submitted by contractors during construction works • Trainings as necessary 			

4 GRIEVANCE MANAGEMENT

JPAC established a Grievance Registry and informed 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](#)) is disclosed on JPAC's website. In addition, a Public Grievance Leaflet ([Annex B](#)) is or will be disclosed on:

- the websites of JPAC and City of Mostar,
- in the offices of the three Local communities (LCs) (LC Gnojnice, LC Blagaj and LC Buna) 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.

Grievances can be submitted in the following ways:

- In the premises of the City of Mostar by filling the grievance form,
- On the construction site by filling the grievance form or in the contractor's camp where the Grievance Box with information about Grievance Mechanism will be placed and where paper versions of the Public Grievance Form will be available,
- Electronically to one of the specified e-mail addresses in the grievance form or on the JPAC's website,
- By phone or fax on the phone numbers specified in the grievance form or on the Company's website.

The contractor(s) and the City of Mostar will forward any received grievances to the JPAC for further action without delay (within 24 hours) to allow JPAC to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). Grievances in relation to construction activities will be addressed by construction contractor(s) and their management will be monitored by JPAC. It is the obligation of the construction contractor(s) to contact the complainant after receiving a complaint in relation to construction activities, in order to be informed in detail about the reasons and basis of the grievance, and to inform JPAC in writing about this, because JPAC cannot undertake actions regarding construction related grievances without a letter from the Contractor. It is also the obligation of the contractor(s) to actively participate in resolving complaints during the execution of works and to keep records of the above. It is the obligation of the contractor(s) to have a person who will be in charge of grievance management during the implementation of this Project. The contractor(s) are 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 as stated above.

Recording and Acknowledging Grievances

All grievances will be recorded in the Grievance Registry and assigned a number, and acknowledged within 5 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 (complaints registry form enclosed in [Annex D](#)).

To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

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

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.

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.

First-Tier Grievance Resolution

JPAC will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If JPAC is not able to address the 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 of the corrective action within 20 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.

Second-Tier Grievance Resolution

If the complainant is not satisfied with the implemented corrective action or justification on why a corrective action is not required, the complaint will be directed to the second-Tier Grievance Resolution which implies third party engagement: mediation or arbitration as stated in chapter 2.3 of the Guide to Grievance Mechanism by the standards of International Financial Institutions from October 2020⁶⁵. 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 (s) 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, JPAC 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, JPAC 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.

To date, JPAC has received seven complaints through the complaint mechanism. There are five complaints registered by the EBRD's Independent Project Accountability Mechanism (IPAM) related to the Mostar South-Tunnel Kvanj section, i.e, IPAM Case 2025/06¹⁸, IPAM Case 2025/05¹⁹, IPAM Case 2025/04²⁰, IPAM Case 2023/04²¹ and IPAM Case 2020/06.²²

Contact information for enquiries and grievances:

Motorways of the Federation of Bosnia and Herzegovina

Attn: Grievance mechanism contact person

Address: Adema Buća 20, 88000 Mostar

Hamdije Kreševljakovića 19, 71000 Sarajevo

Tel: +387 36 512 300

Fax: +387 36 512 301

E-mail: prituze@jpautoceste.ba

www.jpautoceste.ba

EBRD's Independent Project Accountability Mechanism

In addition to project level grievance mechanism managed by the Company, the EBRD's Independent Project Accountability Mechanism⁶⁶ (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

¹⁸ More information available at: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/case-registry/corridor-vc-in-fbh-part-3-request-5.html>

¹⁹ More information available at: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/case-registry/Corridor-Vc-in-FBH-Part-3-Request-4.html>

²⁰ More information available at: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/case-registry/corridor-vc-in-fbh-part-3-request-3.html>

²¹ More information available at: <https://www.ebrd.com/work-with-us/projects/ipam/2023/04.html>

²² More information available at: <https://www.ebrd.com/work-with-us/projects/ipam/2020/06.html>

5 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in Monitoring Reports to be prepared by the PIU. The first report will be produced three months after the beginning of the Project, and will continue on a quarterly basis during construction works and on an annual basis during operation. The reports will include the following information:

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

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

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD.

ANNEXES

A	Public Grievance Form
B	Text for the Public Grievance Leaflet
C	Flowchart for Processing Grievances
D	Complaints register form

A. Public Grievance Form

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

Signature: _____

Date: _____

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

B. Text for the Public Grievance Leaflet

JPAC is striving to ensure that the construction of the section Mostar South-Tunnel Kvanj, 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:

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

Contact details:

Motorways of the Federation of Bosnia and Herzegovina

Attn: Grievance mechanism contact person

Address: Adema Buća 20, 88000 Mostar

Hamdije Kreševljakovića 19, 71000 Sarajevo

Tel: +387 36 512 300

Fax: +387 36 512 301

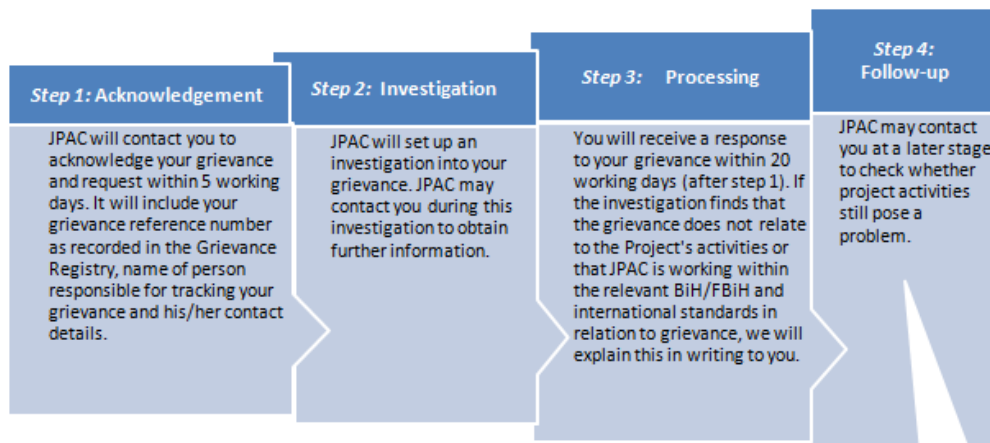
E-mail: prituzbe@jpautoceste.ba

www.jpautoceste.ba

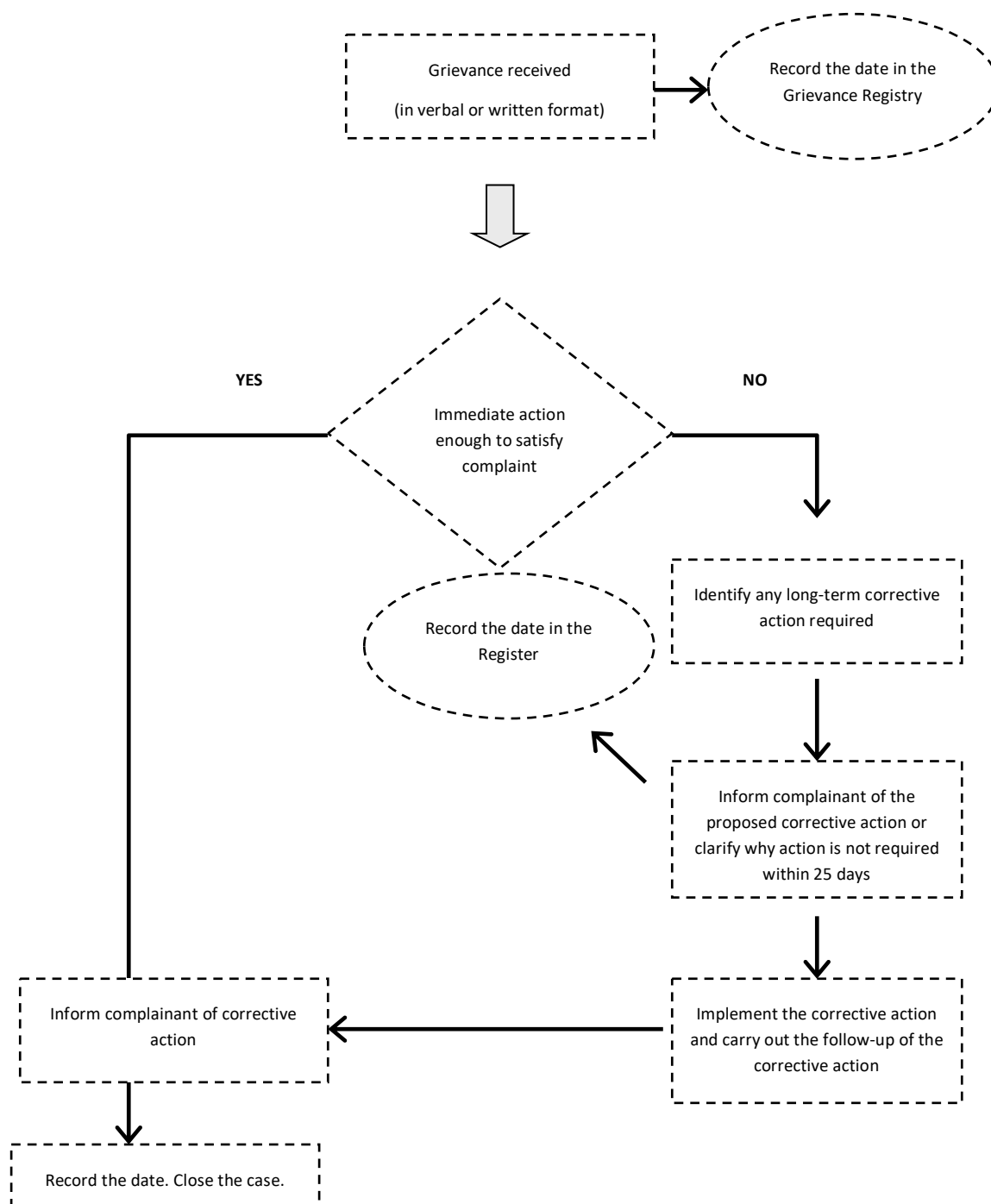
Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, JPAC will ensure that your name and contact details are not disclosed without your consent and only the persons directly involved in the investigation of your grievance will be aware of 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:



C. Flowchart for Processing Grievances



D. Example of complaints register

Reg. number	
Applicant	
Method of receiving complaints	
Project (Section)	
Contractor	
Representative of JPAC	
Date of receipt	
Type of complaint	
Date of occurrence of the disputed situation / damage, etc.	
Description of the complaint	
Location	
Date of acknowledgment of receipt	
Current situation on the ground	
Description of actions taken	
Date of resolving the case	
Notes	
Existence of administrative dispute / Court proceedings	