

Law firm [REDACTED] d.o.o  
[REDACTED] Tešanj  
Bosnia and Herzegovina  
Phone/fax [REDACTED]  
e-mail [REDACTED]  
ID-number: [REDACTED]  
VAT number: [REDACTED]

**EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT  
INDEPENDENT PROJECT ACCOUNTABILITY MECHANISM  
(IPAM)**

**SUBJECT: Request**

Dear Madam/Sir,

We would like to use this opportunity to address you as the legal representatives of [REDACTED] who is the owner and possessor of the family house [REDACTED] Municipality of Tešanj and her family members who live together with her, namely [REDACTED] and minor children [REDACTED] and [REDACTED].

We are also addressing you in the capacity of legal representatives of [REDACTED] who is the owner and possessor of the family house [REDACTED] Municipality of Tešanj, where he lives together with his mother [REDACTED] who belongs to category of 100% disabled persons.

Namely, the procedure related to our complaint about the project Corridor Vc, Section Putnikovo Brdo-Medakovo, more precisely location near the artificial Tunnel "Hrastik" has been ongoing from December 2022 and from January 2023, respectively.

More precisely, these two family houses are located on two sides of the motorway, at the exit from the "Hrastik" Tunnel, looking from the direction of Putnikovo brdo, at a distance of 10 to 13 meters from the very edge of the motorway embankment.

For almost 3 years, these families have been suffering, on a daily basis, the torture of contractors, in the form of noise, dust, night work, the inability to access their houses due to machinery, mud, works, etc., all due to the fact that the expropriation project was prepared against the professional rules and standards and to their detriment.

The family house of [REDACTED] additionally suffered considerable damage, and the stability and statics of the building are endangered, which was confirmed by a construction court expert.

On 13/02/2023, we sent a request for the protection of property rights to the European Bank for Reconstruction and Development, Sarajevo Office, indicating that the properties in question are endangered on many grounds, and that the fact they are located only 10 to 13 meters from the edge of the alignment which is located at the height of the roofs of the mentioned houses is against the social and environmental policies promoted and required by the EBRD for the projects financed by the EBRD.

In the meantime, the owners of the buildings, at their own expense, hired an environmental protection expert who confirmed the negative effects of the proximity of the motorway on the lives and health of the people living there, as well as the effects on the agricultural land, and proposed immediate displacement of the residents to a safe place as well as the expropriation of the said properties.

The requesters' communication with the EBRD led to the engagement of a third-party independent body, the Belgrade-based consultants [REDACTED] whose task was to prepare the report to identify negative impacts on property, life and buildings and propose solutions.

An on-site investigation was carried out prior to that with the representatives of [REDACTED], JPAC and EBRD, including both the representatives from Sarajevo and London.



It was agreed that after receipt of the independent Consultant's opinion, the EBRD will create a precise request to JPAC, and that JPAC will comply with that request.

In its report from November 2023, [REDACTED] described a multitude of negative impacts on the aforementioned households and proposed the subsequent expropriation of the aforementioned buildings as the only socially acceptable and socially responsive solution.

Nevertheless, after the receipt of the Consultant's opinion, the families at risk were faced with a „wall of silence“ from all stakeholders who previously participated in the attempts to solve this problem.

In the course of many conversations and correspondence with the EBRD, we received strong assurance that they understand our position, and that they share the opinion that these families urgently need to be relocated, and their properties expropriated, however, no concrete steps have been taken.

The [REDACTED] families believe that the fact that two family residential buildings are located in the protected zone of the motorway at a distance of 10 to 13 meters from the edge of the motorway, whose construction is financed by the EBRD, is against all environmental and social policies required by the EBRD in the projects it finances.

If the EBRD would allow these residential houses and families to remain where they are, without a strong intervention towards the JPAC, it would thereby harm these families and would require them to bear a disproportionately large burden of public interest at the expense of private interest and fundamental human rights guaranteed to them by the Constitution of BiH and the European Convention on Human Rights and Fundamental Freedoms.

All arguments that you will find in the attachments that we are providing (JPAC Requests dated 16/12/2022, 13/01/2023, Request to the EBRD dated 13/02/2023, [REDACTED] Report dated 30/11/2023, etc.) should be considered as integral parts of this document, both in terms of facts and in terms of presented requests.

Likewise, we are aware of the deadlines for resolving requests as the part of the procedure under the IPAM mechanism, however, in the specific case, we are asking for a faster reaction, given that the works on the site in question are in full swing and that a warmer period is approaching, which implies the intensification of the works

We demand that after the procedure has been carried out, the EBRD as a creditor orders JPAC to comply with the lending contractual terms and spending of funds, and to make changes and additions to the expropriation plan according to the already established procedure, and to expropriate the real estate owned by our clients.

Attached please find the evidence of communication with the EBRD and JPAC, as well as other evidence that corroborate the justification of our request.

We remain at your disposal to provide additional facts and evidence related to the procedure upon request.

Respectfully,

[REDACTED]  
Law Firm [REDACTED]  
[REDACTED]  
[REDACTED] lawyer  
[REDACTED] lawyer  
[REDACTED]  
[REDACTED]

Date: 11/03/2025