

STAKEHOLDER ENGAGEMENT PLAN

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**Technical assistance for the preparation of due diligence
of detailed design and cost estimate and gap analysis of
the existing feasibility study and ESIA for Foca-Hum in
BiH**

Implemented by  in consortium with 

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List of Abbreviations

BiH	Bosnia and Herzegovina
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IPAM	Independent Project Accountability Mechanism
LCO	Local Community Office
NGO	Non-governmental organisation
PIU	Project Implementation Unit
PR	Performance Requirement
PRS	Javno preduzece Putevi Republike Srpske / Public Enterprise Roads of Republika Srpska
RS	Republika Srpska
SEP	Stakeholder Engagement Plan
WB	World Bank
RAP/LRP	Resettlement Action Plan/Livelihood Restoration Plan

1 Introduction

1.1 About the Project

Project Context. The European Bank for Reconstruction and Development (EBRD) and the World Bank (WB) are considering financing for Bosnia and Herzegovina (BiH) and the Public Enterprise Putevi Republike Srpske (PRS) to construct a **13.04 km road section** which forms part of the full 19.14 km Foca-Hum road which stretches from Brod na Drini (Foca) to Hum (Scepan Polje) at the Montenegro border. A Project Implementation Unit (PIU) was established by PRS in March 2025.

Project Location and Scope. The Project route, located within Republika Srpska (RS) in southeastern BiH from Brod na Drini (Foca) to Hum (Scepan Polje) at the Montenegro border, spans 19.14 km through challenging mountainous terrain.

The route is divided into three sections, as shown in table below:

Section	Comment
Section A (5.5 km): Reconstruction of the existing road with minor realignments to improve safety and address terrain constraints	Rehabilitation works are currently underway along this segment, funded through the RS budget.
Section B (13.04 km): A newly designed alignment aimed at enhancing road geometry and accommodating higher travel speeds	Considered to be financed by EBRD and WB¹.
Section C (0.38 km): Construction of a new cross-border bridge over the Tara River	Tendering for construction has been launched. This section is jointly financed by BiH and Montenegro as part of a bilateral agreement - PRS will oversee construction on the BiH side, while Montenegro will manage its connecting section – an associated facility consisting of 2.5 km road linking the existing road Scepan Polje-Pluzine and Section C. As noted in the row above, this Section C also includes the final 250 m of Section B to be financed from state funds.

Strategic Importance. The Foca-Hum road has been recognised as a transport route of strategic importance by several key planning and policy documents in RS. It is listed among the “priority roads” in the Transport Strategy of RS for 2016-2030 and is also explicitly referenced in the Spatial Plan of RS until 2025. Additionally, the Strategy for Development of Public Roads in RS for 2016-2025 highlights this road as one of significant importance to regional connectivity. The strategic relevance of the Project was further confirmed through the Decision on Establishing Public Interest adopted by the Government of RS in 2021.

¹ Note: The final 250 m of Section B will be constructed and financed under Section C financing arrangements, in order to ensure optimal technical integration with the bridge structure and associated works located within Section C.

Key Technical Features. Key technical features include the following:

Road geometry and design speed	<ul style="list-style-type: none"> ■ Design speeds of 70 km/h for Section A and 80 km/h for Sections B and C ■ Minimum horizontal curve radii: 160 m for Section A, 200 m for Section B and 85 m for Section C
Cross-section elements	<ul style="list-style-type: none"> ■ Traffic lanes: 3.25 m width ■ Shoulder width: 1.30 m ■ Marginal strips: 0.30 m ■ Concrete gutters and drainage systems
Pavement structure	<ul style="list-style-type: none"> ■ Wearing course: Asphalt BB 11, 5 cm ■ Base course: Bituminous AGNS22, 7 cm ■ Crushed stone aggregate layer: 30 cm ■ Subgrade reinforcement as needed
Bridges and retaining structures	<ul style="list-style-type: none"> ■ A new 160 m bridge over the Tara River ■ 15 viaducts along the alignment ■ 80 retaining walls of varying lengths and heights to stabilise slopes
Drainage and environmental protection	<ul style="list-style-type: none"> ■ Closed drainage systems for surface water management ■ Erosion control measures
Traffic management and safety features	<ul style="list-style-type: none"> ■ Road signage and markings ■ Guardrails and protective barriers ■ Improved intersections and access roads

Environmental Assessment and Permitting. The environmental assessment process included three rounds. A preliminary EIA was conducted in 2015, followed by transboundary consultations with Montenegro in line with the Espoo Convention. After the consultations, the Ministry of Spatial Planning, Civil Engineering, and Ecology of RS issued a formal Decision in 2017 stating that, due to the nature and scale of the project, it was not obligatory to conduct an Environmental Impact Assessment (EIA) nor to prepare an EIA Study. However, the Decision also established that the project is subject to the obligation to obtain an Ecological (Environmental) Permit in accordance with applicable legislation. In 2024, PRS prepared new supporting documentation titled *Evidence with the Application for the Issuance of an Ecological (Environmental) Permit*. The Ministry informed the public about the submission of the ecological permit request through the daily newspaper Glas Srpske in March 2024. The documentation was published on the Ministry's website and provided to the Foca Municipality to facilitate public review, confirming the Project's continued compliance with environmental and public participation requirements. The Ministry issued an Ecological (Environmental) Permit in June 2024, valid for five years

Key environmental and spatial planning approvals for the Project – such as the Ecological (Environmental) Permit mentioned above, Water Guidelines, Urban Technical Conditions and Location Conditions – have already been obtained. Pending permits include the Building Permit, Water Consent, Water Permit and Use Permit, which will need to be secured prior to construction and operation.

Land Acquisition. The land acquisition process began in 2021, based on the original road design. It is nearly complete. Once the final Project footprint and a revised Expropriation Study (in line with RS legal requirements) are available, a Resettlement Action Plan/Livelihood Restoration Plan (RAP/LRP) will be prepared for any additional land needs. Minor design deviations (1-3 m) are anticipated, primarily due to technical improvements such as changes in retaining structures or intersections. These are expected to remain within the already designated corridor.

Involvement of World Bank in 2024. The Project forms part of the broader WB-financed ‘Sustainable, Integrated and Safe Road Infrastructure Project’.

In October 2024, PRS disclosed the following WB-compliant documents²:

- ESMF – Environmental and Social Management Framework
- SEP – Framework Stakeholder Engagement Plan
- ESCP – Environmental and Social Commitment Plan
- LMP – Labor Management Procedures
- RPF – Resettlement Policy Framework

Joint financing of the Project is currently under consideration by the EBRD and WB.

1.2 Objective and Scope of this Stakeholder Engagement Plan

As stated above, the **Framework Stakeholder Engagement Plan (SEP)** was developed and disclosed by PRS in October 2024, in accordance with WB requirements. Its purpose is to establish a structured approach for stakeholder engagement, including public information disclosure and consultations, throughout the entire project cycle.

The **Framework SEP mandates the development of site-specific SEPs** to provide a more detailed and tailored approach. These site-specific SEPs outline a structured roadmap, specifying the number and timing of engagements, target groups, media types, appropriate communication channels, discussion topics, feedback mechanisms, and other key aspects of stakeholder consultations and public information dissemination relevant to specific activities, investments, or sub-projects.

Therefore, the objective of this **site-specific SEP** is to define a stakeholder engagement program, ensuring transparent communication and consultation throughout the project’s lifecycle. It details how PRS will engage with stakeholders and provides a structured mechanism for raising concerns, submitting feedback, and lodging complaints related to the project. As a **living document**, this SEP will be periodically updated by PRS to reflect key changes in project activities, emerging developments or adjustments to the project scope.

² Available at: <https://shorturl.at/AChy8>

2 Regulatory Requirements for Stakeholder Engagement

2.1 Local Legislation Requirements

The Project and the Project implementor (PRS) are subject to several legal obligations that mandate transparency, access to information and public participation in decision-making processes. These obligations stem from Republika Srpska laws on free access to information, public enterprises, environmental protection and spatial planning, as well as international commitments such as the Aarhus Convention:

1. As a public enterprise, PRS is required to apply the provisions of the RS *Law on Free Access to Information*³, 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.
2. It is also required, in accordance with the *Law on Public Enterprises in RS*,⁴ 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.
3. In addition, the *Law on Environmental Protection of Republika Srpska*⁵ emphasises public participation as a fundamental component of environmental governance. One of its guiding principles is the **principle of public participation and access to information**, which requires authorities to involve the public in:
 - EIA procedures
 - Issuing of environmental permits

This process involves **public disclosure and consultations with a wide range of stakeholders**. Additionally, in cases where a project may have **transboundary environmental impacts**, as defined by the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), an opinion from the relevant environmental authority of the affected country must be obtained.

The specific stakeholder engagement activities undertaken for this Project are detailed in Chapter 4.1 Summary of Stakeholder Engagement Done During Project Preparation of this SEP.

4. **Public participation is a mandatory component of the spatial planning process**, as mandated by the *Law on Spatial Planning and Construction of Republika Srpska*⁶, as well as the *Rulebook on the Manner of Preparation, Content and Formation of Spatial Planning Documents*⁷. Spatial plan developers are required to specify the place, time and manner of presenting the spatial plans public consultation. Spatial plans must include evidence of public consultations, such as minutes from public hearings and other relevant records, demonstrating that public input has been considered in the planning process. Spatial plans are public

³ Official Gazette of Republika Srpska, No. 32/01 and 48/11

⁴ Official Gazette of Republika Srpska, No. 75/04 and 34/06

⁵ Official Gazette of Republika Srpska, No. 71/12, 79/2015 and 70/20

⁶ Official Gazette of Republika Srpska, No. 40/13, 2/15 decision of the Constitutional Court, 106/15 and 3/16 – corr., 104/18 - decision of the Constitutional Court, and 84/19

⁷ Official Gazette of Republika Srpska, No. 40/13

documents and must be made permanently available to the public at the relevant urban planning authority, including on its website.

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

There are no other national requirements on stakeholder engagement comparable with WB and EBRD requirements elaborated below.

2.2 World Bank Requirements

ESS 10 (Stakeholder Engagement and Information Disclosure) of the WB’s ESF recognises the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice.

Stakeholder engagement is further highlighted in **ESS1** (Assessment and Management of Environmental and Social Risks and Impacts), **ESS5** (Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement), **ESS6** (Biodiversity Conservation and Sustainable Management of Living Natural Resources), and **ESS8** (Cultural Heritage). All consultations must be conducted in line with the principles set out in ESS10.

ESS10 objectives are the following:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances allow Borrowers to respond to and manage such grievances.

A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project, and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP. The Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of

concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

2.3 EBRD Requirements

In its Environmental and Social Policy 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. **PR 10** (Information Disclosure and Stakeholder Engagement) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

Stakeholder engagement is a key component integrated throughout the Policy, with particular emphasis on **PR 1** (Assessment and Management of Environmental and Social Risks and Impacts), **PR 5** (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), **PR 6** (Biodiversity Conservation and Sustainable Management of Living Natural Resources), and **PR 8** (Cultural Heritage). All consultations are required to be conducted in accordance with the principles and standards defined in PR 10.

EBRD's PR 10 requirements can be summarised as follows:

- The stakeholder engagement process involves stakeholder identification and analysis, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- Clients must ensure that stakeholders have access to timely, relevant, and understandable information, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
- The client will undertake meaningful consultation, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.
- To respond to stakeholders' concerns related to the project in a timely manner, the client will establish an effective grievance mechanism as early as possible in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances.
- Clients are required to develop and implement a SEP that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.

2.4 Key Differences between Local Legal Framework and Lenders' Requirements

The following gaps between BiH legislation and Lenders' requirements have been identified:

- The Lenders require the development of a SEP to guide the disclosure of Project documents and consultations with affected people and other stakeholders,
- The Lenders require a very proactive approach in obtaining the public opinion and identifying and engaging with all stakeholders, as opposed to a reactive approach, i.e., responding only to comments/questions submitted and issues raised, after they have been submitted/raised,
- Particular attention is required by the Lenders in identifying and engaging with vulnerable groups,

- The establishment and implementation of a Project dedicated grievance mechanism (accessible for all stakeholders, including vulnerable groups) is required by the Lenders, in addition to national administrative and judicial grievance procedures,
- Consultations with stakeholders, according to the Lenders' requirements, should be on-going for the duration of the Project as opposed to consultations concentrated during the permitting period.

This SEP has been developed to address the above listed gaps and to ensure that all WB and EBRD requirements in connection to stakeholder engagement are being adequately addressed by the Project.

3 Project Stakeholders

3.1 Introduction

For the purposes of transparent, inclusive and effective engagement, stakeholders of the road Project have been grouped into two core categories:

- **Affected parties** – those directly or indirectly impacted by the Project and requiring close engagement.
- **Other interested parties** – those who may not be directly affected but have an institutional, regulatory or advocacy role relevant to Project implementation or oversight.

Note: The stakeholder list is not exhaustive. Additional stakeholders may be identified during implementation. PRS invites any individuals, groups or organisations who consider themselves affected or interested to reach out through designated contact points to participate in engagement activities or raise concerns.

3.2 Affected Parties

Affected parties are individuals, groups or other entities who are impacted or likely to be **impacted directly or indirectly** by the Project – either positively or negatively, and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

The following stakeholders fall within this category:

1.	<p>Local residents along the road corridor – Residents living near the planned road alignment who may experience increased dust, noise and vibrations, especially during earthworks and heavy machinery operation, temporary access restrictions to homes, land or local roads during certain phases of construction and heightened exposure to construction traffic risks, which is particularly important for children, elderly or persons with limited mobility.</p> <p>This includes the representatives and visitors of the Hum-Bastasi Mosque with an adjacent graveyard which is located approximately 20 m from a planned viaduct.</p>
2.	<p>Property owners subject to expropriation – People whose land or property has been or will be expropriated for the construction of the new road. This also includes individuals whose property is not formally subject to new expropriation, but who have constructed assets on land previously expropriated for the Buk Bijela hydropower project, and who may now need to relocate due to the Project footprint.</p>
3.	<p>Protected area managers – managers of Nature Park Tara and Nature Park Piva, as the Project alignment intersects with both protected areas, potentially impacting their biodiversity values. Additionally, although not directly intersected, National Park Sutjeska may experience impacts due to changes in regional traffic patterns and tourism flows.</p>

4.	Road users – Various groups relying on the M-18 corridor for daily travel and commercial activities, including: a) private vehicle drivers and passengers, b) freight and logistics companies transporting goods through the corridor, c) public transport operators, d) as well as a significant number of tourist buses, particularly during the summer season, when the route is heavily used by travelers heading to the Montenegrin coast.
5.	Tourism operators and rafters – Businesses operating rafting camps along the Drina and Tara Rivers, hotels, restaurants and tour companies dependent on safe and accessible infrastructure for tourism. Many of the rafting camps are members of the Association of Rafting Camps.
6.	Local fishers – Local fishers who rely on the Rivers Drina and Tara and who may experience temporary disruptions to fish populations and water quality. Many of the local fishers are members of the Sports Fishing Society “Mladica”.
7.	Local hunters – Hunters in the area who may experience changes in habitat accessibility or wildlife migration patterns. Many of the hunters are members of the Hunting Association “Bakic”.
8.	Contractors or subcontractors for construction, monitoring and supervision of works, and their employees.

3.3 Other Interested Parties

This group includes regulatory bodies, NGOs and civil society actors who may not be directly impacted by the Project but have a regulatory, oversight, advisory or advocacy role in relation to it.

The following stakeholders fall within this category:

Local government institutions	
1.	Municipality of Foca and Municipality of Pluzine – local authorities involved in land use planning and zonings.
2.	Municipal Tourism Organisations in Foca and Pluzine – local authorities responsible for tourism promotion and visitor management.
3.	Local Community Offices – representative bodies advocating for the interests of local populations.
State and entity level authorities	
4.	Ministry of Communications and Transport of BiH – the state-level authority responsible for coordination efforts and overseeing transport infrastructure policies.
5.	Republika Srpska level ministries (Ministry of Transport and Communications, Ministry of Spatial Planning, Construction and Ecology, Ministry of Health, Ministry of Agriculture, Forestry and Water Management), all of which play critical roles in permitting, environmental oversight, sectoral approvals and ensuring compliance with relevant laws and policies.
6.	Institute for the Protection of Cultural, Historical and Natural Heritage of RS – which is the responsible authority in the area and has already issued an expert opinion as part of the Location Conditions.
7.	Public Institution “Vode Srpske” – which is responsible authority for issuance of Water Acts and prescribing measures regarding public water assets. “Vode Srpske” has already issued Water Guidelines as part of the Location Conditions.
Montenegrin institutions	
8.	Montenegrin Ministry of Transport – a key cross-border partner which is co-financing the River Tara border bridge and will manage the road connection on the Montenegrin side.
9.	Traffic Administration of Montenegro – responsible for the planning, development, maintenance, and regulation of Montenegro’s road infrastructure.
10.	Montenegrin Environmental Protection Agency – ensures compliance with environmental standards.
Land and property management authorities	
11.	Republic Administration for Geodetic and Property-Legal Affairs and the Public Attorney’s Office of Republika Srpska – responsible for managing expropriation and land ownership issues.
Safety and customs authorities	

12.	Border police and customs authorities in BiH and Montenegro – responsible for ensuring efficient operation of border crossings.
13.	Traffic police – responsible for traffic safety.
Environmental and biodiversity NGOs	
14.	Environmental and biodiversity NGOs – advocacy groups and experts monitoring potential environmental impacts, including organisations focused on conservation of Nature Park Tara and Nature Park Piva and groups advocating for environmental and biodiversity protection in transboundary regions. These include: <ol style="list-style-type: none"> 1. Association “Resource Aarhus Centre in BiH” Sarajevo, 2. Centre for Environment (Aarhus Centre) in Banja Luka, 3. Environmental Movement “Ozon” – Aarhus Centre Niksic, 4. Mountaineering and Speleological Association “Vucija Stopa”, 5. Society for Research and Protection of Biodiversity 6. Centre for Protection and Research of Birds of Montenegro 7. Arbor Magna – Natural Heritage Protection Society 8. Association “Dinarica” 9. Ornithological Association “Nase ptice” 10. Centre for Karst and Speleology
Forest management authorities	
15.	Forest management companies – responsible for managing reforestation and environmental rehabilitation efforts.

3.4 Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged/vulnerable people are those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

The Foca-Hum road upgrade Project passes through sparsely populated rural areas, with a concentration of homes and activities near the start of the route. Based on the socio-economic context and field consultations, several groups and locations along the alignment may be considered **vulnerable** due to their proximity to construction activities, reliance on the local environment or limited access to alternative services and income sources.

1. Residents living close to the alignment

Residents living in close proximity to the planned road corridor (many of these residents are elderly, with potentially reduced mobility) are at elevated risk of construction-related noise, dust and vibration exposure as well as increased safety risks from heavy machinery or transport movements.

2. Small-scale farmers in the area

While agricultural activity in the Project area is generally non-commercial, a number of households depend on subsistence farming and seasonal income from livestock or the sale of products (e.g. eggs, honey, dairy) to nearby rafting camps and others. These households may face temporary access restrictions to grazing or production areas, noise and dust affecting livestock and potential disruption of product sales due to reduced tourism during construction.

Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the Project is provided in Chapter 5.1 Proposed Strategy to Incorporate the Views of Vulnerable Groups of this SEP.

4 Previous Stakeholder Engagement

4.1 Summary of Stakeholder Engagement Done During Project Preparation

During Project preparation, the following public consultation activities were conducted:

4.1.1 Disclosure and Consultations During the Spatial Planning Process

As stated previously, in RS, the *Law on Spatial Planning and Construction*⁸ is the key law in this area. A key feature is its emphasis on public participation in decision-making. The Law establishes spatial planning as an ongoing, multidisciplinary process involving strategic documents (e.g., the RS Spatial Plan) and implementation plans (e.g., zoning and regulatory plans). Drafts of spatial plans must be publicly displayed for at least 30 days with notices published in at least two media outlets. Public presentations and debates must be organised, allowing authorities, experts and citizens to discuss plans. All feedback must be reviewed, with responses provided by the responsible body.

The **RS Spatial Plan (2015-2025)**⁹ is the strategic framework at entity level for infrastructure development. It identifies the need for significant infrastructure development in the Project area, specifically mandating the full modernisation of the main road from Foca to Scepan Polje, including the construction of a bridge over the Tara River. During its development in 2014, the draft plan was open for public review in all local government offices for two months, and a set of public discussions were held. The plan was then adopted by the RS National Assembly in February 2015.¹⁰

The Project location is not covered by any municipal-level spatial planning document currently in force in Foca. No single regulatory plan fully encompasses the Project area. There are two publicly available **regulatory plans** that partially that partially address specific segments of the route:

- The *Regulatory Plan for 'Hum-Scepan Polje', including applicable amendments*, which designates a corridor for the new road alignment, marking it as the “new route”.
- The *Regulatory Plan 'Brod na Drini', including applicable amendments*, which covers the starting section of the Project route in the Brod settlement.

For both regulatory plans, the Foca Municipal Administration ensured public participation as required by the spatial planning legislation. All were made available for public review at several physical and online locations and presented through scheduled public hearings. No specific comments or objections were made to the Project.

4.1.2 Disclosure and Consultations During the Local EIA Process

Three rounds of environmental assessment were conducted:

1. A **Preliminary Environmental Impact Assessment (EIA)** procedure for the Foca-Hum road was conducted in 2015, based on the Conceptual Design developed in the same year. Following the review, the Ministry of Spatial Planning, Civil Engineering, and Ecology of RS issued a decision requiring the development of a full EIA Study.

⁸ Official Gazette of Republika Srpska, No. 40/13, 2/15 – Constitutional Court decision, 106/15 and 3/16 – correction, 104/18 – Constitutional Court decision and 84/19

⁹ Amendments to the Spatial Plan of Republika Srpska until 2025, Official Gazette of Republika Srpska, No. 71/11, 72/12, 17/14 and 15/15

¹⁰ Given the lack of available records from the 2014 consultation process, the Consultant was unable to verify whether any objections or concerns were raised at the time; however, because the Spatial Plan refers to the Foca-Scepan Polje road reconstruction only by name (without further detail) and that local communities have long awaited improved connectivity along this corridor, it is reasonable to conclude that no substantive concerns were raised during that phase.

Transboundary consultations were also conducted. In accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), the Ministry of Foreign Affairs of BiH submitted a notification to the Ministry of Sustainable Development and Tourism of Montenegro, informing them that the Ministry of Spatial Planning, Construction and Ecology of RS had initiated the preliminary EIA procedure for the Project.

The Ministry of Sustainable Development and Tourism made the relevant documentation publicly available on its official website and invited the public to submit any comments or suggestions via email to the designated contact person¹¹. No comments were received.

2. In 2017, the Ministry of Spatial Planning, Civil Engineering, and Ecology of RS initiated the **local EIA process** for the Project, triggering the legal requirements for public notification, document accessibility and stakeholder feedback. As part of the EIA review, the Ministry sought opinions from several institutions, including the Ministry of Health of RS, the Ministry of Agriculture, Forestry and Water Management of RS, the Institute for the Protection of Cultural, Historical and Natural Heritage of RS, the Municipality of Foca. Montenegro's Ministry of Ecology, Sustainable Development and Northern Region Development (via the Ministry of Foreign Trade and Economic Relations of BiH) was also contacted for an opinion but did not respond at the time.

After reviewing the inputs, issued a formal Decision in 2017 stating that, due to the nature and scale of the project, it was not obligatory to conduct an EIA nor to prepare an EIA Study. However, the Decision also established that the project is subject to the obligation to obtain an Ecological (Environmental) Permit in accordance with applicable legislation.

3. In 2024, PRS prepared new supporting documentation titled *Evidence with the Application for the Issuance of an Ecological (Environmental) Permit*. The Ministry informed the public about the submission of the ecological permit request through a daily newspaper in March 2024. The documentation was published on the Ministry's website and provided to the Foca Municipality to facilitate public review. In May 2024, the Municipality of Foca confirmed that a one-month public notification process had been conducted, during which only one objection was received. One citizen raised concerns regarding two culverts potentially affecting private land. However, an agreement with "Put Inzenjering" Trebinje confirmed that the existing culverts were in accordance with the regulatory plan. The citizen subsequently withdrew the complaint in June 2024, as noted in the Municipality's supplemental opinion.

Based on this process, the Ministry issued a new **Ecological (Environmental) Permit in June 2024**, valid for five years, confirming the Project's compliance with environmental regulations and public participation requirements.

4.1.3 Disclosure of WB Set of Framework Documents and Consultations

The public consultation process for the Set of Framework Environmental and Social Documents under WB guidelines began on October 7, 2024. The draft Environmental and Social Framework was published on the websites of PRS and the Municipality of Foca.

A public consultation notification was issued in both English and local language, and PRS and the Municipality of Foca additionally informed the Ministry of Spatial Planning, Construction and Ecology, along with other stakeholders and NGOs, via email. No comments were received on the framework documents during the consultation period, either electronically or in hard copy.

¹¹<https://www.gov.me/clanak/165591--prekograncne-konsultacije-u-vezi-procjene-uticaja-na-zivotnu-sredinu-za-projekat-rekonstrukcije-i-poboljsanja-dionice-magistral>

A public consultation meeting was held in October 2024, attended by PRS and Municipality representatives. Only one member of the public participated, raising concerns about expropriation, stating that he had received an offer and filed an appeal. After the meeting, participants received an email clarification stating that a RAP/LRP will be developed, with consultations and WB verification before public disclosure. Construction will not begin until all compensation is paid per the RAP/LRP.

4.1.4 Consultations During the E&S Due Diligence Process

Stakeholder engagement activities were undertaken during the independent E&S due diligence process for EBRD and WB. The purpose was to reach out in the early stage of the Project to stakeholders to better understand their views, interests and concerns.

Stakeholder	Date	Details
Municipality of Foca	12 February 2025	<p>The Municipality was consulted to discuss local support for the Project and the role of municipal authorities in its implementation. The Mayor stressed that successful implementation of the Project is essential for the social and economic development of Foca and the wider border area, including the Municipality of Pluzine in Montenegro. He highlighted that the community has waited over 40 years for improved road infrastructure and that public support for the Project is strong, with no recorded opposition.</p> <p>The Mayor noted that the Project would improve local living conditions, boost tourism and increase the number of foreign visitors. Foca's natural beauty and strategic location already attract tourists as part of regional "Balkan tours," but poor road conditions toward Montenegro often deter repeat visits. Rafting is the main tourist activity. The wood industry is the municipality's only industrial sector. Agricultural activity is limited, with only a few registered farms and production focused on household needs.</p> <p>The Municipality of Foca maintains close cross-border cooperation with the Municipality of Pluzine, with which it has jointly implemented several projects.</p>
Tourism Organisation of Foca	12 February 2025	<p>The Tourism Organisation was consulted to discuss the potential impacts of the Project on tourism in the region. Discussions focused on how improved infrastructure, particularly the new road, could enhance visitor accessibility and encourage tourism growth. The organisation highlighted the benefits for local businesses, including increased visitor traffic to accommodation providers, restaurants and outdoor recreation services.</p>
Local Community Office (LCO) of Brod, local residents whose houses are in close proximity to the planned route and a local restaurant owner	3 April 2025	<p>The meeting was held to understand the views and concerns of residents living near the Project route. The LCO representative explained that the population living around the Project corridor is mostly elderly, with limited agricultural activity. Some residents are employed in local sawmills or municipal services; others work seasonally abroad or in Montenegro.</p> <p>Residents stated that they had not been engaged during the EIA phase or consulted in earlier stages. The LCO president emphasised the need for direct and continuous communication with PRS going forward. Participants expressed support for the Project, especially if it results in improved local roads, which are currently gravel and affect both daily life and tourism. The residents stressed the need for better communication, opportunities for local employment during construction, and sensitivity to the proximity of homes and livelihoods near the alignment.</p>
Authorities involved in expropriation	12 February 2025	<p>The Republic Administration for Geodetic and Property-Legal Affairs and the Public Attorney's Office of Republika Srpska (Deputy Seat Foca) were consulted to review previous activities related to land acquisition and resettlement for the Project. Discussions covered the legal procedures governing expropriation, compensation mechanisms, and the responsibilities of different authorities in managing land-related concerns.</p>
Hunting Association "Bakic"	12 February 2025	<p>The Association manages a hunting ground covering 74,471 hectares, which includes the entire section of the Foca-Hum road alignment. With 528 active members, it oversees wildlife protection, population monitoring, breeding and control activities, along with commercial and tourist hunting. Activities follow a 10-year Game Management Plan and annual reporting to the RS Ministry of Agriculture.</p> <p>The area hosts diverse species, including wild boar, deer, bear, chamois, wolf, jackal, and birds of prey. No key habitats or corridors are expected to be affected by the Project.</p>

Stakeholder	Date	Details
		<p>Although roadkill is rare due to current low traffic speeds, incidents (mainly with wild boar) have occurred. The Association stressed the need for wildlife warning signs, noting they are held financially liable for vehicle collisions with animals despite lacking control over road infrastructure.</p> <p>They expressed dissatisfaction with current communication and requested formal, ongoing coordination. While improved access is welcomed, they emphasised the need for safety measures to protect both wildlife and drivers.</p>
Sports Fishing Society “Mladica”	12 February 2025	<p>The Society has 131 members and manages 240 km of rivercourses in the Foca area under a 10-year concession. Their main activities include fishery protection, restocking, catch regulation, and maintaining competition zones. Annual work plans and reports are submitted to the RS Ministry of Agriculture, Forestry, and Water Management.</p> <p>Fishing is recreational, with competitions held in May-June and the <i>Hucho Hucho</i> Cup in November-December, including routes near the Project alignment. Shortening of routes during construction was not seen as a concern.</p> <p>Key species include trout, grayling, huchen (protected), chub, and barbel. Huchen does not spawn along the affected river section. Fish populations have shifted, with grayling now more dominant due to changing water levels. Nase spawns at the Tara-Piva confluence.</p> <p>Water quality in the Drina and Tara rivers is high, though rafting causes temporary disturbance. Construction impacts (such as vibration, dust and noise) may affect fish migration but are expected to be short-term and minor.</p> <p>The Society has had no prior cooperation with PRS but is open to engagement. They may seek compensation under the RS Fisheries Law if needed and requested updates and a formal meeting during implementation.</p>
Ornithological Association “Nase ptice”	17 February 2025	<p>The Ornithological Association “Nase ptice” was consulted to obtain information on the ornithofauna baseline, discuss potential impacts of the Project on bird species and gather any data on biodiversity and previous research activities conducted in the vicinity of, or along, the proposed Project route. The association’s representative noted that no specific field data are currently available for the Project area. While the Project location was described as ecologically interesting, The Association’s representative confirmed that the lack of site-specific research prevents any definitive conclusions about the extent of potential impacts. The representative emphasised that, although major effects are not expected, this cannot be confirmed with certainty. It was agreed that the Association would provide any additional relevant data, if available.</p>
Nature Park Piva	7 March 2025	<p>A stakeholder meeting with Nature Park Piva was organised to obtain relevant information regarding the Park’s management, local biodiversity, applicable legislation related to construction within the Park, and potential impacts associated with Project implementation.</p> <p>During the meeting, it was emphasised that the Project intersects the first-degree protection zone of Piva Nature Park, where permanent construction is strictly prohibited under national legislation and the Park’s Management Plan. This was further verified by overlaying the Project layout with GIS maps of the Park’s zoning, which confirmed that the Project route only crosses a second-degree protection zone.</p>

Stakeholder	Date	Details
		<p>Additionally, it was highlighted that the current five-year Management Plan contains no provisions permitting construction within the Park's boundaries, reiterating that all activities must comply with relevant protection measures, legal frameworks, and zoning regulations. It was clarified that Nature Park Piva is part of the Emerald Network and is currently under assessment for inclusion in the Natura 2000 network, with a formal proposal expected by the end of 2026. Furthermore, a parliamentary declaration adopted between 2004 and 2007 established the Tara River as a "no-go" zone for infrastructure development, parts of which lie within the UNESCO-designated Biosphere Reserve.</p> <p>The Centre for Protection and Research of Birds of Montenegro has identified a bird migratory corridor along the Piva River canyon. It was also noted that the fish population in the Piva River is currently in a "null state," as documented in the Nature Park's Declaration Study. The region was also recognised for its high ecological value due to a substantial bear population, with bears protected under Montenegrin law. Their movements are actively monitored to understand migration patterns and behaviour. Management plans for both bears and wolves have been jointly developed for Sutjeska Nature Park (Bosnia and Herzegovina) and Piva Nature Park.</p>
Association of Rafting Camps	3 April 2025	<p>This meeting was held to understand potential impacts of the Project on tourism activities, particularly rafting, which is a key economic driver in the area.</p> <p>The representatives stated that they do not anticipate major negative impacts from the Project and expressed interest in staying engaged throughout its implementation. The rafting season runs from May to September, with peak activity in July and August, especially on weekends. Camps rely heavily on road access for international guests and requested timely updates during construction to avoid confusion or delays at the border.</p> <p>Their primary concerns during the construction phase include maintaining road access, preventing traffic congestion during peak tourist periods, and minimising dust near campsites. Trio Lux Camp specifically requested that the spoil disposal sites not be placed nearby due to concerns about dust and visual impacts.</p> <p>Camp operators also raised the issue of water supply, noting that many of their water intake points are located near the planned road route. They emphasised the need to avoid damage to these sources. Electricity supply is unreliable during storms, though camps avoid using generators where possible.</p> <p>The camps have good cooperation with local producers and contribute to the local economy by sourcing food and beverages locally. While some competition exists with Montenegrin camps, there is general cross-border cooperation.</p> <p>The president of the Association will serve as the primary contact for future communication. Of the 34 rafting camps in the area, 10 are not members of the Association but may still be affected. The group expressed a strong interest in maintaining close coordination with the contractor during construction.</p>

Stakeholder	Date	Details
Municipality of Pluzine	4 April 2025	<p>The Municipality of Pluzine was consulted due the cross-border nature of the proposed road alignment. Municipal representatives and local stakeholders shared that Crkvicko Polje, home to around 200 mostly elderly residents, is the nearest community to the planned bridge over the Tara River. About 10-15 people live near the bridge location, and a local restaurant also operates beneath the proposed alignment.</p> <p>The central concern raised during the meeting was the current location of the border crossing. Stakeholders strongly advocated for relocating the checkpoint from the Montenegrin side to the BiH side, directly in front of the new bridge. They explained that the current arrangement restricts both local and tourist mobility and significantly affects socio-economic conditions in the area. Even to access the Tara River, people must pass through border control, which is seen as unreasonable and disruptive.</p> <p>The community expressed frustration over long-standing issues of isolation and exclusion and emphasised that relocating the border crossing would improve daily life, strengthen tourism, and restore easier access between local settlements and nearby campsites.</p>
Mountaineering and Speleological Association “Vucija Stopa”	17 April 2025	<p>The Mountaineering and Speleological Association “Vucija Stopa” was consulted to obtain information regarding the presence of speleological features and associated fauna within the Project area, as well as potential impacts on these features and the association’s activities. The association confirmed that there are no caves, caverns, or other subterranean ecosystems located along the proposed Project route that would be affected by its implementation. The representative also identified the nearest known cave, Galaca, and provided its geographic coordinates. Based on this information, it was established that the cave is located approximately 3 km from the Project route, indicating no expected direct impact.</p>
Mosque and Vaqif Office representatives	17 April 2025	<p>The Hum-Bastasi Mosque representatives was consulted due to its proximity to the road corridor and its cultural and religious significance to the local community. The mosque representatives provided background on the mosque’s history and use. They confirmed that the mosque is actively used, particularly during Eid and summer months. While they did not express concerns about dust, noise or vibration during construction, they highlighted the importance of ensuring uninterrupted access to the mosque. They stressed that this is the only road serving the mosque and must remain accessible at all times.</p> <p>The representatives noted that the local community had not been engaged during earlier Project phases. They expressed strong interest in being informed earlier in any future activities. They welcomed the planned reconstruction of the access road and expressed no concerns related to the operational phase of the Project.</p>
Environmental Movement “Ozon” – Aarhus Centre Niksic	18 April 2025	<p>A meeting with “Ozon” Montenegro was conducted in order to present the Project route and to assess potential impacts that are expected from the Project. The representative emphasised the need for internal consultation and highlighted the importance of proactively informing and engaging local communities. In this context, the representative recommended initiating dialogue with the Montenegrin Ministry of Transport and the WB local offices.</p> <p>Despite recognised sensitivities, representative expressed the view that the Project is unlikely to encounter significant obstacles, particularly given that no new structural pillars are planned within the River Tara itself.</p>

Stakeholder	Date	Details
		<p>Furthermore, the necessity of ensuring that the Project aligns with existing conservation priorities was stressed, such as those outlined for Piva Nature Park, and complies with relevant international legal frameworks, including the Espoo Convention on transboundary environmental impact assessment. It was also advised that regional stakeholders should be included in forthcoming consultations.</p>
Association for Research and Biodiversity Protection	18 April 2025	<p>The Association was consulted to obtain information on the biodiversity baseline and any research activities conducted in the vicinity of, or along, the proposed Project route. The association's representative provided relevant data, particularly emphasising the presence of important bird species listed under Natura 2000, such as the golden eagle (<i>Aquila chrysaetos</i>) and the peregrine falcon (<i>Falco peregrinus</i>). In addition to these, cosmopolitan bird species and game species like the rock partridge (<i>Alectoris graeca</i>) are also present in the area. However, it was clarified that the site is not considered a key nesting habitat for birds.</p> <p>The representative also noted that the area serves as a flyover corridor for migratory raptors. While no established vulture colonies are located within the site, the nearest known colony is at Uvac, located approx. 90 km from the nearest point of the Project route. It was recommended that particular attention be given to sections of the Project where the planned infrastructure crosses tributaries. In these areas, appropriate technical and technological measures should be implemented to mitigate ecological impacts.</p> <p>Additionally, measures should be taken to prevent low-altitude crossings by songbirds from being obstructed or disrupted. The ecological value of the area was strongly emphasised, with over 1,000 species recorded and significant habitat diversity observed. Key concerns raised included potential impacts at tributary crossings, the necessity of avoiding disruptions to low-altitude bird movements, and the importance of applying protective measures in wetland zones.</p> <p>The presence of otters (<i>Lutra lutra</i>) was confirmed, and the potential presence of beavers was also noted, reinforcing the need to maintain habitat connectivity. Finally, while large carnivores are likely to be present, the area is considered somewhat spatially isolated from the Nature Park Tara.</p>
Association "Resource Aarhus Centre in BiH"	21 April 2025	<p>Stakeholder meeting with Association "Resource Aarhus Centre in BiH" was conducted regarding potential cross-border environmental impacts and the level of involvement from Montenegrin institutions. Key issue raised were regarding the other stakeholder meeting, on which it was confirmed that initial contact had already been established with NGOs, and further engagement with relevant state bodies, including the Environmental Protection Agency and the Directorate for Transport of Montenegro, are planned. It was also noted that consultations have already taken place with the municipality of Pluzine, rafting associations, and Piva Nature Park. No objections from local communities have been reported to date. As no other issues were raised both parties agreed to maintain further communication via email, if necessary.</p>

Stakeholder	Date	Details
Centre for Environment (Aarhus Centre) in Banja Luka	22 April 2025	<p>CZZS was consulted to obtain information regarding potential impacts on biodiversity and wildlife migration. The environmental risks, particularly to wildlife corridors at higher elevations, were acknowledged. However, it was further explained that mitigation measures would include the construction of bridges and the preservation of existing local roads.</p> <p>The presence of large mammals in the wider area, including the Eurasian lynx (<i>Lynx lynx</i>), was also discussed, with the importance of close monitoring further emphasised.</p>
National Park Sutjeska	24 April 2025	<p>Meeting with NP Sutjeska regarding park management, tourism and infrastructure development was conducted. Representatives highlighted that the Park is divided into designated protection zones, with the Perucica area classified under strict protection, where no active management is permitted. The Perucica forest area is located approx. 12 km from the nearest point of the Project route. The remaining areas are under second-degree protection, allowing for limited interventions such as sanitary logging. A main road traverses the Park, having existed prior to its official designation. Notably, approximately 1,400 hectares of primeval forest remain undisturbed.</p> <p>The Park also manages its own hunting ground, where activities are restricted exclusively to sanitary culling. Regular wildlife monitoring is not conducted; however, the presence of lynx (<i>Lynx lynx</i>) has been confirmed.</p>
Nature Park Tara	15 May 2025	<p>The meeting was conducted to discuss the potential implications of the Project on the protected area and its management. The representatives confirmed that the Project does not pose any concerns from their side, nor does it interfere with the Park's responsibilities related to the management of protected natural values or forest resources. On the contrary, it was noted that the improved road infrastructure is likely to enhance access to the protected area and facilitate movement along other local routes within the Nature Park. The Project was therefore viewed as potentially beneficial for the Nature Park.</p> <p>It was further clarified that the planned road alignment intersects only marginally with the edge of the protected area. According to available data and field knowledge, this section does not host any endangered flora or fauna species requiring heightened attention. The current border crossing at Hum is also located within the boundaries of the Nature Park, specifically in the third-level protection zone, and is already subject to significant anthropogenic influence and increased traffic intensity. In accordance with the Law on Nature Protection of RS¹², activities such as road restoration, maintenance and construction are permitted within this zone, provided they are implemented in line with relevant spatial planning and program documentation.</p>
Transport Directorate of Montenegro	5 June 2025	<p>The meeting focused on Section C of the road, specifically the continuation of the route beyond the planned cross-border bridge over the River Tara and the current status of design activities on the Montenegrin side.</p>

¹² Official Gazette of Republika Srpska, No. 49/24

Stakeholder	Date	Details
		<p>The Directorate confirmed that a bridge contact point has been designated, and design documentation initiated, though progress has stalled due to limited engagement from the designer. A variant route covering an additional 2.5 km in Montenegro has been developed. The Directorate has requested an elevation increase of 4 meters for the bridge. The proposed route will deviate by 20-30 m from the current M18 main road towards the future joint Paklice border crossing. While Montenegro has launched its national EIA procedure, the consultant for EIA preparation is yet to be appointed. Construction and Environmental Permit are expected to be secured by the end of the year, with the bridge permit issued by RS and confirmed by Montenegro's Ministry of Ecology, Spatial Planning and Urbanism.</p> <p>The Public Enterprise Montenegro Roads is currently preparing the tender documentation. Construction of the bridge is expected to be completed within three years of contract signing (by 2029).</p> <p>Since the route passes through Piva Nature Park and crosses the River Tara, the Environmental Protection Agency is expected to issue the Environmental Permit with specific conditions.</p> <p>No public objections have been received so far, but some may emerge during consultations. The additional road section will be funded by the Montenegrin state budget, based on current information. The cross-border bridge will be co-financed by Montenegro and BiH.</p> <p>Tourist sites, settlements and rafting camps in Montenegro are not expected to be negatively affected. Viaducts or alternative connections will be provided to link the route to the joint border crossing. A control point will be established before the crossing to facilitate access for both local residents and tourists. The connection to Pluzine will be maintained via this crossing. No grievances have been received from local residents, who have not yet been informed about the Project.</p>
Public Institution "Vode Srpske"	16 June 2025	<p>The purpose of the meeting was to clarify permitting procedures and responsibilities related to water protection, stream crossings and the potential relocation of public drinking fountains along the Project route.</p> <p>"Vode Srpske" explained that all watercourses and flood-prone land (1-in-100 year flood zone) are classified as public water assets and any construction within this area requires special oversight. According to the RS Water Law, works on public water assets are generally prohibited unless mitigation measures are in place.</p> <p>"Vode Srpske" is engaged at three permitting stages where the mitigation measures are defined: (1) optional Water Guidelines during early design and while obtaining Location Conditions; (2) mandatory Water Consent after Urban Technical Conditions are issued and before Construction Permit is obtained; and (3) final Water Permit upon construction completion and before technical acceptance.</p> <p>Several small streams cross the planned alignment, most of which are second-class watercourses. Culverts may be used where necessary, but their capacity must be based on hydraulic modelling for a 1-in-100 year flood. Spanning is preferred for larger streams to avoid maintenance issues. Management responsibility for watercourses depends on their regulatory status. Natural streams fall under the jurisdiction of "Vode Srpske," while regulated channels are managed by "Vode Srpske" if classified as first-class watercourses. Water-related structures on second-class watercourses are managed by local authorities or the respective structure owners.</p>

Stakeholder	Date	Details
		<p>The Water Management Plan (2017–2021) remains in effect pending a new version. Flood risk maps are publicly available online, though no Flood Risk Management Plan has yet been adopted. “Vode Srpske” also stressed that wastewater discharges must comply with statutory effluent standards.</p> <p>Finally, for any spoil disposal sites along the Drina riverbanks, a flood polygon analysis and geotechnical study must be carried out to prevent landslides, slope instability or river obstruction.</p>

5 Stakeholder Engagement Program

5.1 Proposed Strategy to Incorporate the Views of Vulnerable Groups

The Project recognises that certain community members may face greater exposure to Project-related impacts and may also encounter barriers in participating in public engagement processes. In particular, residents living in close proximity to the planned road alignment, including elderly persons, individuals with health issues, or persons with disabilities, as well as small-scale farmers who rely on subsistence agriculture or seasonal income, have been identified as potentially vulnerable.

To ensure inclusive participation and address the specific needs of vulnerable groups, the following targeted engagement measures will be implemented:

- **Locally accessible communication channels:** All information on public consultations, disclosure of documents, and opportunities for feedback will be announced through trusted and easily accessible local channels. These include: the LCO Brod office, public notice boards in high-traffic areas such as the public notice board near the Brod bus station, popular local gathering spots which are commonly visited by residents and serve as informal community hubs, and the notice board of the Hum-Bastasi Mosque.
- **Local meeting locations:** Consultation meetings will be held in locations that are physically close, familiar and accessible to local residents. The proposed venues include the LCO Brod office and the “Skadarlija” restaurant, both recommended by the LCO President as convenient and welcoming spaces. These venues are intended to reduce transportation needs and create a more comfortable environment for participation, especially for elderly residents or those with mobility limitations.
- **Use of non-digital media:** Announcements and reminders will also be broadcast through Radio Foca, a widely listened-to local station, to ensure broad outreach.
- **Flexible timing:** Consultation events will be scheduled with consideration for local agricultural activities. To increase participation, sessions will be held at various times including late afternoons and/or weekends to accommodate the schedules of farmers.
- **Individual or small group consultations:** For those unable or unwilling to participate in public meetings, individual or small-group consultations will be made available by PRS. These will be arranged as needed, in coordination with the LCO representative as necessary.

5.2 Documents and Information to be Disclosed

This section details the PRS’s strategy and planned activities to keep all stakeholders informed and involved throughout the Project’s lifecycle.

In addition to the set of environmental and social documents already disclosed by PRS in October 2024, PRS also plans to disclose the following documents as early as possible in the Project development process:

- This site-specific SEP with the Project Grievance Form,
- Non-technical Summary of the Project,
- Environmental and Social Management Plan,
- Biodiversity Management Plan,
- Updated Resettlement Policy Framework,
- Updated Labour Management Plan (to be disclosed exclusively by the World Bank, in line with its disclosure requirements).

The documents will be publicly available in local language(s) of Bosnia and Herzegovina/Montenegrin and English language in electronic and printed forms at:

Name of organisation	Website	Address
PRS	www.putevirs.com	Trg Republike Srpske 8, Banja Luka
Municipality of Foca	www.opstinafoca.rs.ba	Kralja Petra I, Foca

The disclosure of the documents will also be announced through notifications posted through locally accessible and well-frequented channels to ensure broad community awareness:

- The LCO Brod office
- Notice boards in high-traffic areas such as the public notice board near the Brod bus station
- Popular local gathering spots, including the “Skadarlija” restaurant and the “Antik” restaurant, which are commonly visited by residents and serve as informal community hubs
- The notice board of the Hum-Bastasi Mosque in the Project area

5.3 Planned Consultation Meetings

PRS will schedule and hold the following public consultation meetings as follows:

- **One public meeting after the Main Design is developed** – to present the Project to the public and offer a clear understanding of the Project’s scope and objectives. This meeting will also serve as an opportunity for stakeholders to provide feedback; and
- **One public meeting prior to the start of construction** – to present the detailed plan of the Project to stakeholders, including information on expected duration of construction works, the available Project-specific grievance mechanism, alternate routes and any other relevant Project specifics.

These consultations will be held at the premises of LCO Brod or in the “Skadarlija” restaurant¹³ to enable ease of access for all community members (without significant travel or logistical challenges).

PRS will inform all stakeholders about the exact date, time and venue where the meetings will be held 10 days in advance through the following channels:

1. websites of PRS and the Municipality of Foca
2. announcements posted through Radio Foca
3. local media and newspapers in wide circulation in Foca
4. Facebook page <https://www.facebook.com/focavijesti/> which publishes daily news from Foca

All Project-related comments and proposals will be considered by PRS. A brief report (“**comments matrix**”) on comments/proposals received and responses from PRS will be published on its website.

For community members who are unable or unwilling to attend public meetings, **PRS will offer the option of individual or small-group consultations**. Such meetings will be arranged on a case-by-case basis, taking into account the specific needs of each individual or group, and may be conducted at their home, a mutually agreed-upon neutral location or within the premises of the LCO Brod office. Coordination may be undertaken in close collaboration with the LCO representative.

All meetings will be documented with **Minutes of the Meeting** kept and shared with attended participants for transparency and accurate evidence of engagement and discussion points, including reflection on raised concerns, recommendations and objections, if any.

The majority of **NGOs** consulted during the development of this SEP indicated a clear preference for communication via email. In response, PRS will ensure that a link to the full Project disclosure package and invitations to consultation meetings are shared via email with all identified NGOs who have

¹³ These two locations have been proposed by the LCO President as familiar to local residents, offering accessible and comfortable spaces for community engagement.

expressed interest or are deemed relevant based on their thematic focus (e.g. environment, biodiversity, etc.). The contact list of NGOs is below, and will be reviewed and updated regularly by PRS to ensure continued relevance and inclusiveness.

Table 1: List of NGOs interested in the Project

No.	Name of NGO	E-mail
1.	Hunting Association "Bakic"	lubakic01@gmail.com
2.	Sports Fishing Society "Mladica"	srdmladica@gmail.com
3.	Association of Rafting Camps	TBA
4.	Centre for Environment (Aarhus Centre) in Banja Luka	info@czzs.org
5.	Environmental Movement "Ozon" – Aarhus Centre Niksic	office@ozon.org.me
6.	Association "Resource Aarhus Centre in BiH" Sarajevo	koordinator@aarhus.ba
7.	Mountaineering and Speleological Association "Vucija Stopa"	psdvucjastopa@gmail.com
8.	Society for Research and Biodiversity Protection	dizb.banjaluka@gmail.com
9.	Ornithological Association "Nase ptice"	naseptice@hotmail.com
10.	Centre for Protection and Research of Birds of Montenegro	czip@czip.me
11.	Arbor Magna – Natural Heritage Protection Society	arbormagna@arbormagna.rs.ba
12.	Association "Dinarica"	info@dinarica.org
13.	Centre for Karst and Speleology	info@centarzakrs.ba

5.4 Disclosure of Information on Construction Activities

PRS and its contractors will proactively disclose relevant **information on construction activities to affected communities and other stakeholders**. This includes:

- Start and end dates of major construction phases
- Working hours, including any planned works during weekends or nights
- Temporary traffic changes or detours, including expected duration and alternative access routes
- Temporary restrictions on land access or movement near construction zones
- Planned noise- or dust-intensive activities, especially near residential areas or sensitive locations
- Safety measures to be implemented to protect the public during construction

This information will be shared through the following channels:

- Public notice boards at Local Community Offices and municipal building
- Posters in frequently visited locations
- Updates on the PRS and municipal websites
- Local radio announcements

Special attention will be given to **coordination with rafting camps and tourism operators** along the Drina and Tara Rivers, who have requested timely information in order to plan their operations:

- The contractor will designate a focal point for tourism-related coordination, particularly during the rafting season.
- A monthly schedule of planned works will be shared in advance with rafting camps through the Association of Rafting Camps.
- Any unexpected changes to construction timing or traffic arrangements that could impact tourist flows will be promptly communicated to minimise disruption.
- Where feasible, construction activities that could affect river access or key tourist weekends will be adjusted, in consultation with affected operators.

The Project will maintain open lines of communication through designated contact persons and the Grievance Mechanism, allowing the public to seek clarifications or raise concerns related to construction.

5.5 Stakeholder Needs and Stakeholder Engagement Methods

The following table outlines the key Project stakeholders, presenting their specific issues or interests, the objectives of engagement, and the planned methods to ensure effective communication and feedback.

Table 2: Stakeholder engagement objectives and approaches

Identified stakeholder	Specific issues or interests	Engagement objectives	Engagement methods
AFFECTED PERSONS			
Local residents along the road corridor (including representatives and visitors of the Hum-Bastasi Mosque)	<ul style="list-style-type: none"> ■ Exposure to construction-related impacts (dust, noise, vibrations, traffic safety) ■ Temporary access restrictions to homes, land and local roads ■ Concerns regarding proximity of works to sensitive sites like the Hum-Bastasi Mosque and adjacent graveyard ■ Increased risk for vulnerable groups (elderly, children, persons with disabilities) 	<ul style="list-style-type: none"> ■ Inform residents in advance of construction phases, timing and potential impacts ■ Provide accessible grievance channels and responsive feedback loops 	<ul style="list-style-type: none"> ■ Distribute printed notices and posters in LCO Brod office, mosque notice board, and key public spaces ■ Broadcast updates via Radio Foca and local Facebook pages ■ Community meetings at LCO Brod and “Skadarlija” restaurant ■ Offer individual or small group consultations for those unable to attend ■ Deliver advance notice of works near the mosque and hold dialogue with religious representatives as needed
Property owners subject to expropriation	<ul style="list-style-type: none"> ■ Unresolved grievances regarding payment or valuation for the already completed expropriation process ■ Need for timely and clear information about design finalisation in case additional land acquisition is needed ■ For individuals whose property was previously expropriated for the Buk Bijela hydropower project but continued to use or reside on the land: need for clarity about entitlements and support 	<ul style="list-style-type: none"> ■ Ensuring that all compensation payments have been completed and properly documented for the already completed expropriation process ■ Ensure any newly affected property owners are clearly informed about their rights and entitlements in case additional land acquisition is needed ■ Clarify entitlements for those who continued to occupy previously expropriated property 	<ul style="list-style-type: none"> ■ Access to the Project’s grievance mechanism ■ Past land acquisition audit for the already completed expropriation process ■ Socio-economic survey during development of a Resettlement Action Plan/Livelihood Restoration Plan for any newly affected property owners in case additional land acquisition is needed ■ Support for those who will need to relocate
Protected area managers (Nature Parks Tara, Piva, Sutjeska)	<ul style="list-style-type: none"> ■ Potential impacts of construction on biodiversity, watercourses and protected habitats ■ Risk of disturbance to wildlife corridors and ecosystems due to noise, vibration and pollution ■ Potential for increased pressure on park resources from tourism or access roads ■ Need for alignment of project activities with national conservation regulations and park management plans 	<ul style="list-style-type: none"> ■ Ensure the Project aligns with conservation priorities and legal requirements within protected areas 	<ul style="list-style-type: none"> ■ Coordination between PRS/PIU and park authorities during design finalisation and construction ■ Early notification of works within or near protected boundaries with opportunity for input
Road users	<ul style="list-style-type: none"> ■ Temporary detours or delays due to construction activities ■ Road safety risks during construction 	<ul style="list-style-type: none"> ■ Inform road users about planned construction phases and any expected disruptions 	<ul style="list-style-type: none"> ■ Public announcements via Radio Foca ■ Clear signage along the road and at key intersections

Identified stakeholder	Specific issues or interests	Engagement objectives	Engagement methods
	<ul style="list-style-type: none"> ■ Expectations for long-term improvement in road condition and travel time 	<ul style="list-style-type: none"> ■ Promote road safety and awareness of construction zones ■ Provide advance notice of detours and alternative routes ■ Minimise travel delays and maintain access where possible 	
Tourism operators and rafters	<ul style="list-style-type: none"> ■ Potential disruption to rafting routes and river access during construction ■ Impacts on tourist flows and seasonal income due to noise, dust, or blocked access roads ■ Need for clear and timely updates on construction activities ■ Concerns over preserving the natural landscape and reputation of the area as a nature tourism destination 	<ul style="list-style-type: none"> ■ Ensure tourism activities can continue with minimal disruption ■ Enable timely adjustments to itineraries and bookings through early communication ■ Build a relationship between contractors and local tourism operators ■ Prevent economic losses during high season 	<ul style="list-style-type: none"> ■ Send the link to the Project disclosure package and invitations to consultation meetings directly to the Association of Rafting Camps ■ Assign a dedicated focal point on behalf of the contractor for tourism coordination during construction ■ Provide monthly construction schedules in advance via the Association of Rafting Camps and local tourism offices ■ Share updates on any unexpected changes to works or traffic that affect river or road access
Local fishers	<ul style="list-style-type: none"> ■ Potential disturbance to aquatic ecosystems and fish populations from construction activities (e.g. noise, sediment runoff, vibrations) ■ Temporary loss of access to fishing spots due to restricted riverbank or bridge works ■ Concern about long-term effects on fish habitat and water quality 	<ul style="list-style-type: none"> ■ Identify and minimise construction impacts on local fishing activities 	<ul style="list-style-type: none"> ■ Send the link to the Project disclosure package and invitations to consultation meetings directly to the Sports Fishing Society "Mladica" ■ Use local channels (e.g. LCO Brod office, radio announcements, public notices) to disseminate relevant updates ■ Share construction schedules and locations in advance, especially works near rivers or during spawning seasons ■ Provide access to the grievance mechanism for raising concerns
Local hunters	<ul style="list-style-type: none"> ■ Temporary or permanent disturbance to wildlife habitats due to vegetation clearance, noise and increased human activity during construction 	<ul style="list-style-type: none"> ■ Ensure that hunters are informed about the timing, location and scope of construction activities that may affect hunting areas 	<ul style="list-style-type: none"> ■ Send the link to the Project disclosure package and invitations to consultation meetings directly to the Hunting Association "Bakic" ■ Use local channels (e.g. LCO Brod office, radio announcements, public notices) to disseminate relevant updates

Identified stakeholder	Specific issues or interests	Engagement objectives	Engagement methods
			<ul style="list-style-type: none"> ■ Provide access to the grievance mechanism for raising concerns ■ Install wildlife warning signs along the road in areas identified by hunters as common wildlife crossings
Contractors and workers	<ul style="list-style-type: none"> ■ Working conditions ■ Occupational health and safety ■ Access to the grievance mechanism for workers 	<ul style="list-style-type: none"> ■ Ensure that all workers and contractors are aware of their rights, responsibilities, and available support systems ■ Ensure compliance with the RS Labour Law and WB/EBRD ESS requirements 	<ul style="list-style-type: none"> ■ Pre-construction induction sessions covering E&S obligations, community conduct expectations, safety procedures and grievance mechanisms ■ Dedicated grievance mechanism for workers (as per the Labour Management Procedure), with confidential and accessible channels
OTHER INTERESTED PARTIES			
Municipalities of Foca and Pluzine and Municipal Tourism Organisations in Foca and Pluzine	<ul style="list-style-type: none"> ■ Need for timely information on road closures, detours, or activities affecting tourist access and movement ■ Interest in maintaining local economic activity and protecting tourism flows 	<ul style="list-style-type: none"> ■ Ensure regular and transparent communication on Project activities and construction progress ■ Coordinate on public consultations and dissemination of information to the local population and tourists ■ Minimise disruption to tourism during peak season by aligning work schedules and traffic plans 	<ul style="list-style-type: none"> ■ Provide monthly work schedules to both municipalities and tourism offices, especially during rafting season ■ Share tourism-relevant changes with tourism organisations in advance, including any works affecting rafting access or river safety ■ Include Municipality of Foca representatives in the Project Grievance Redress Committee (PGRC), where appropriate (see Chapter 7 for details)
State and entity level authorities	<ul style="list-style-type: none"> ■ Sector-specific responsibilities in permitting, spatial planning, environmental compliance, public health, agriculture and forestry ■ Protection of cultural, historical, and natural heritage sites along the Project corridor ■ Management of public water resources 	<ul style="list-style-type: none"> ■ Secure and maintain all necessary approvals and permits in line with applicable laws 	<ul style="list-style-type: none"> ■ Timely submission of all required documentation and requests for permits/approvals ■ Formal correspondence with each authority during key permitting stages
Montenegrin institutions	<ul style="list-style-type: none"> ■ Oversight of Project compliance with bilateral cross-border agreement ■ Monitoring potential impacts on Montenegrin territory due to construction near the border ■ Coordination of road safety and traffic management across the border 	<ul style="list-style-type: none"> ■ Maintain open communication channels to manage any transboundary environmental, safety or social risks 	<ul style="list-style-type: none"> ■ Regular formal communication through bilateral channels and working groups (as agreed under the cross-border cooperation agreement)

Identified stakeholder	Specific issues or interests	Engagement objectives	Engagement methods
Land and property management authorities	<ul style="list-style-type: none"> ■ Finalisation and verification of land ownership and boundaries ■ Interest in any new land acquisition needed during Project design finalisation 	<ul style="list-style-type: none"> ■ Coordinate on handling disputes related to land ■ Verification and registration of newly identified land plots required for any Project changes 	<ul style="list-style-type: none"> ■ Coordination with PRS/PIU as needed during final land verification ■ Participation in grievance resolution processes where land registration status is in question
Safety and customs authorities	<ul style="list-style-type: none"> ■ Road safety management during construction, including traffic control and accident prevention ■ Enforcement of traffic restrictions, detours, and speed limits in construction zones ■ Customs procedures at or near the border crossing (Hum-Šćepan Polje) 	<ul style="list-style-type: none"> ■ Ensure timely coordination between PRS, contractors and relevant authorities to manage safety risks ■ Facilitate enforcement of temporary traffic and safety regulations during construction ■ Enable planning and coordination of customs procedures 	<ul style="list-style-type: none"> ■ Organise coordination meetings between contractors, PIU and local safety/customs authorities prior to key construction phases ■ Share construction schedules and traffic management plans in advance ■ Maintain regular communication channels with traffic police and border/customs posts
Environmental and biodiversity NGOs	<ul style="list-style-type: none"> ■ Potential impacts of road construction on protected areas, sensitive species, and river ecosystems (Drina, Tara, Sutjeska) ■ Habitat fragmentation or increased disturbance to flora and fauna ■ Adequacy of mitigation and monitoring measures during construction and operation 	<ul style="list-style-type: none"> ■ Ensure that NGOs are well-informed of potential environmental risks and mitigation plans ■ Enable opportunities for technical feedback, dialogue, and collaboration where appropriate 	<ul style="list-style-type: none"> ■ Send the link to Project disclosure package and invitations to consultation meetings directly to the identified NGOs ■ Use local channels (e.g. LCO Brod office, radio announcements, public notices) to disseminate relevant updates ■ Provide access to the grievance mechanism for raising concerns
Forest management authorities	<ul style="list-style-type: none"> ■ Prevention of soil erosion and degradation of forest ecosystems during construction 	<ul style="list-style-type: none"> ■ Ensure that forest and landscape values are protected during construction and post-construction phases 	<ul style="list-style-type: none"> ■ Maintain regular communication meetings with forestry authorities ■ Share detailed construction maps and schedules, especially where forest areas may be directly or indirectly impacted

6 Responsibilities for Implementing Stakeholder Engagement

PRS will serve as the lead entity responsible for stakeholder engagement throughout the life of the Project. To ensure successful SEP implementation, the Project has an E&S Specialist within the PIU team, who will be supported by the Communication Specialist who is also part of the PIU team.

PRS will regularly update this SEP in line with new findings, stakeholder inputs and evolving Project conditions, ensuring that the engagement strategy remains relevant and responsive. It will be responsible for the overall planning, implementation and monitoring of SEP activities, with a particular focus on meaningful communication and transparency.

As part of its responsibilities, PRS will lead the disclosure process by making the full Project disclosure package publicly accessible and will coordinate all stakeholder engagement activities, including consultation meetings and ongoing dialogue with affected and interested parties.

In addition, PRS will oversee and manage the Project-level Grievance Redress Mechanism (GRM), ensuring that all grievances are logged, addressed in a timely manner and reflected in regular monitoring updates. The GRM database will be maintained by PRS, and quarterly reports on the nature and volume of grievances will be submitted to the Lenders to demonstrate accountability and responsiveness to public concerns.

The PIU will coordinate closely and effectively with other public and competent authorities involved in the Project, including the Municipality of Foca (see the Chapter 7 Grievance Mechanism below).

7 Grievance Mechanism

Purpose. The grievance mechanism is designed to support the timely and effective resolution of complaints and concerns. It serves as a transparent and credible process that fosters trust and cooperation with stakeholders, while also providing a formal avenue for corrective actions.

Responsibilities and oversight. PRS holds full responsibility for establishing and maintaining a functioning GRM, informing stakeholders about the GRM's purpose, procedures and contact points; and coordinating with affected municipalities and local authorities to support implementation. PRS has appointed a Communication Specialist within the PIU to manage the GRM.

Structure. The Project-level GRM will operate through a tiered system, consisting of:

- **GRM Focal Point:** The appointed Communication Specialist within the PIU who will be responsible for logging all grievances and managing the grievance log.
- **Project GRM Committee:** First-tier resolution body composed of PIU members, PRS technical staff and municipal representatives as needed.
- **Second-tier Ad-hoc Grievance Redress Committee:** Second-tier resolution body coordinated by PRS, involving PRS legal and management staff and, where appropriate, representatives from competent authorities or civil society organisations relevant to the grievance subject.

Grievance submission. Grievances may be submitted through the PIU (see contact details below). Grievances can also be submitted directly to the contractor or supervision engineer once construction

starts. The contractor and supervision engineer will forward any grievances received within 3 working days to the GRM Focal Point.

Contact details for submission of grievances
Foca-Hum road in Bosnia and Herzegovina
Public Enterprise Roads of Republika Srpska – Project Implementation Unit
Communication Specialist
Tel: + 387 51 330 330
Fax: + 387 51 334 545
E-mail: ifi.projekti@putevirs.com
Address: Trg Republike Srpske 8, Banja Luka

Grievance logging. The GRM Focal Point will register all grievances in a dedicated logbook.

Each grievance will be recorded in the registry with the following information:

- description of grievance including an indication of the type (topic) of the grievance to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- 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,
- date of receipt of grievance and when acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures, preventive measures), and
- date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution.

Acknowledgment and response. Upon receiving a grievance, the GRM Focal Point will acknowledge receipt of the grievance within 3 working days to the person who submitted it¹⁴. They will outline the next steps and provide an expectation of when the complainant can expect to hear back from the project implementers. The GRM Focal Point will then involve the Project GRM Committee in investigating the submission.

Following the investigation, the GRM focal point will propose a resolution to the complainant in writing within a timeframe of 10 calendar days from the moment the complaint was acknowledged. If an issue is still pending by the end of 10 days, the complainant will be provided with an update regarding the status of the complaint and the estimated time by which a proposed resolution will be provided. Feedback for anonymous complaints will be provided on the PRS webpage.

Appeal process. In case a complainant is dissatisfied with the proposed resolution, the appeal will be forwarded to the Second-tier Ad-hoc Grievance Redress Committee, who shall decide on the lodged appeal within 30 calendar days.

Satisfaction monitoring. The PIU GRM focal point will also be responsible for designing and administering a short complainant satisfaction survey in order to capture feedback providers' satisfaction with their interaction with the parties implementing the project and the resolution proposed following the submission of their grievance.

Availability of other legal remedies. In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.).

¹⁴ If the grievance is first received by the Contractor or Supervision Engineer, the GRM Focal Point will acknowledge receipt within 3 working days of receiving it from the Contractor or Supervision Engineer.

World Bank's Grievance Redress System (GSM). Communities and individuals who believe that they are adversely affected by a WB supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service. The Service ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the WB's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org.

EBRD's Independent Project Accountability Mechanism. EBRD's Independent Project Accountability Mechanism (IPAM) is an independent mechanism that 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 E&S Policy 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.

8 Monitoring and Reporting

8.1 Summary of How SEP Will be Monitored and Reported Upon

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

Key indicators to be tracked include:

- **Number and types of grievances** received during the reporting period, including details on whether they were opened, resolved, or closed and whether resolution occurred within the timeframe set out in the grievance mechanism.
- Types and frequency of information disclosure activities, including the communication channels used.
- Details of **consultation meetings and other engagement activities**, including the date, location, number of participants, key issues raised and how stakeholder input was addressed by PRS.

8.2 Reporting Back to Stakeholder Groups

PRS will report back regularly to stakeholders as follows:

- All stakeholder engagement activities will be documented.
- All meetings held will be documented through brief minutes of meetings and shared with the participants.
- Key Project updates will be posted on the PRS website and social media.

APPENDIX 1: PROJECT GRIEVANCE FORM

Designation (entered by the PIU)	
First name and surname (not obligatory) I would like to lodge a complaint anonymously. Please do not disclose my identity without my consent.	
Contact data Signify the desired manner of contact (by mail, by telephone, by email).	By mail: <i>Provide an address for mail delivery:</i> By telephone: By email:
Description of event to which the complaint relates	What occurred? Where did it happen? To which person did it happen? What came out as a consequence of the problem?
Date of the event / complaint	
	Event that occurred once/complaint (date _____) It occurred more than once (how many times? _____) Ongoing (a problem that currently exists)
What would you want to be undertaken?	

Submit to:
Foca-Hum Road in Bosnia and Herzegovina
Public Enterprise Roads of Republika Srpska - Project Implementation Unit
Communication Specialist
 Tel: + 387 51 330 330
 Fax: + 387 51 334 545
 E-mail: ifi.projekti@putevirs.com
 Address: Trg Republike Srpske 8, Banja Luka

APPENDIX 2: TABLE FOR DOCUMENTING STAKEHOLDER ENGAGEMENT

Date/venue:
Participants:
Stakeholder concerns:
Proposals given by stakeholder(s):
How will these proposals be taken into account in project design/ implementation?
Other notes:

APPENDIX 3: TEMPLATE TO CAPTURE CONSULTATION MINUTES

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps