

2024

**DRAFT DOCUMENT – Stakeholder  
Engagement Plan (SEP) for the  
Sustainable, Integrated and Safe  
Road Infrastructure Project**



Putevi RS

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**List of Definitions for Terms Used in This Document**

<b>CONSULTATION</b>	The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
<b>ENVIRONMENTAL SOCIAL STANDARDS</b>	<b>AND</b> The 10 Environmental and Social Standards (ESSs) set out the requirements that apply to all new World Bank investment project financing enabling the World Bank and the Borrower to manage environmental and social risks of projects.
<b>PAP</b>	“Project Affected Party” is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<b>PROJECT</b>	Refers to the BiH Water and Sanitation Services Modernization Project
<b>STAKEHOLDERS</b>	Refers to individuals or groups who: (a) are affected or likely to be affected by the project ( <i>project-affected parties</i> ); and (b) may have an interest in the project ( <i>other interested parties</i> ).
<b>STAKEHOLDER ENGAGEMENT</b>	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions
<b>STAKEHOLDER ENGAGEMENT PLAN</b>	A plan which assists the Borrower to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
<b>VULNERABLE GROUPS</b>	People, especially those below the poverty line, the landless, the elderly, women and children, or other displaced persons who may not be protected through national land compensation legislation, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

**Abbreviations**

BAM	Bosnia-Herzegovina Convertible Mark
BiH	Bosnia and Herzegovina
CPF	Country Partnership Framework
CSO	Civil Society Organization
ESS	(World Bank's) Environmental and Social Standard
GDP	Gross Domestic Products
GRM	Grievance Redress Mechanism
GRC	Grievance Review Committee
LG	Local Government
OG	Official Gazette
PE	Public Enterprise
PI	Performance Indicators
PIU	Project Implementation Unit
Putevi RS	Putevi Republike Srpske
RS	Republika Srpska
SEP	Stakeholder Engagement Plan
SCD	Systematic Country Diagnostic

## 1 INTRODUCTION and PROJECT DESCRIPTION

### 1.1 Project context

Bosnia and Herzegovina's (BiH) geographical location defines its transport network as crucial for economic and regional integration, connecting the country with main trading partners (Croatia, Serbia, Montenegro), EU countries, and different regions within BiH. The current road network, carries 90% of passenger and 80% of freight transport in the country. Despite a declining population, the motorization rate has increased by over 30% in the past decade, especially in road freight traffic while geographical features make development of other forms of traffic difficult and costly. Key transport links are part of the Indicative extension of the Core and Comprehensive Trans-European Transport Network (TEN-T) to the Western Balkans. Improving these links is a priority for transport investment.

Significant investments have been made in the main road corridors over the last decade, totaling EUR 1.75 billion between 2008 and 2020, with an additional EUR 1 billion currently in implementation. However, investments in the primary road network have lagged, totaling about EUR 400 million. Many core road corridors are under construction or in the design phase, but key corridors still lack finance and maintenance, leading to a backlog.

The BiH transport sector has a complex institutional structure, administered at the state level by the Ministry of Communications and Transport (MOCT) and at the entity level by separate Ministries of Transport and Communications (MOTC). In Republika Srpska (RS), management of motorways and state road networks is entrusted to entity companies; Public Company Republic of Srpska Motorways (PC RS Motorways) manages motorways in RS, state roads by Putevi Republike Srpske (Putevi RS) while local roads are managed by municipalities and cities. Road conditions are generally good, but a significant portion of roads in fair and poor condition require intervention.

Road companies have established road inventories and asset management tools, but these need full institutionalization for effective maintenance planning. Previous projects supported the establishment of asset management systems, but outdated condition surveys reduce accuracy. The focus is now on systematically adopting economic prioritization modules for planning. Achieving long-term financial sustainability funding is challenging and road companies, they largely rely on commercial and IFI lending, but debt servicing is a growing concern due to rising interest rates and upcoming debt maturities. Other challenges include achieving long-term financial sustainability, increasing expenditure efficiency, and improving sector governance. Prioritization of new construction and maintenance is crucial, and so is investing in climate change resilience of road infrastructure for though climate, landscape and hydrology features differ in the Project covered area, impacts such as frequent flooding, soil erosion, droughts, and storms, are increasingly common.

The World Bank-supported Sustainable, Integrated, and Safe Road Infrastructure Project aims to address key issues such as expenditure efficiency, governance, climate change impacts on critical roads, improved maintenance, and enhanced safety, including resolving significant blackspots. The Project Development Objectives (PDO) will be measured using the following key results indicators:

- **Connectivity:** Reduced travel time between Brod na Drini (Foca) and Hum (Scepan Polje) on the M-18 (Route 2b of the TEN-T network).
- **Road Safety:** Reduced number of traffic fatalities on selected roads.
- **Resilience:** All project designs incorporate climate resilience best practices and recommendations from road safety inspections and audits.
- **Management:** Development and reporting of annual and multiannual business plans based on outputs from the Road Asset Management System (RAMS).
- **Financing:** Increased financial capacity to undertake maintenance and investments.

## 1.2 Brief Project description

The Sustainable, Integrated and Safe Road Infrastructure Project aims to enhance regional transport connectivity and improve road network management through the following: Upgrading sections of regional corridor route 2b, connecting Sarajevo and Podgorica; Implementing interventions to enhance climate resilience by investing in slope stability, flood protection measures, and addressing road safety black spots. This includes addressing the backlog of rehabilitation work and addressing climate and road safety vulnerabilities to achieve an overall maintainable condition while reducing network vulnerability; Providing institutional support to enhance road network management and the governance of road companies in both Republika Srpska (RS); Improving the financial sustainability of the companies through modern asset management techniques that optimize the use of limited public funds.

The focus of the Project is to enhance regional connectivity and improve the quality and sustainability of the magistral road network in Bosnia and Herzegovina (BiH). The main objectives include upgrading Route 2b, which connects Sarajevo (BiH) and Podgorica (Montenegro), as well as the reconstruction, rehabilitation and maintenance of priority magistral roads. Subcomponent 1.1 involves the upgrade of a 13.245 km section of Route 2b between Brod na Drini (Foca) and Hum (Scepan Polje), with the funding coming from an EBRD loan and WBIF grant. The current road is in poor condition, characterized by active landslides, deformations, and narrow width. The sub-project will include the repair of bridges, overpasses, and culverts, with the exclusion of the interstate bridge over the river Tara (to be funded from other sources) and will address road vulnerability to flooding and landslides. The works will be tendered through a design and build approach, with an expert mobilized to support the client in preparing the necessary documents. The subcomponent will cover the design build contract, including bridges, interchanges, and road safety audits. Subcomponent 1.2 involves the financing of selected sections of the program for the reconstruction, rehabilitation, and maintenance of priority magistral roads, improving approximately 150 km of road. The works will focus on resurfacing, pavement widening, traffic signalization improvements, structure renewal, road safety improvements, and rehabilitation of bridges and tunnels. Specific blackspot improvements have been identified, including two bridges (over rivers Drnjaca and Tatinac) in RS. These improvements will lead to a better ride quality, lower operating costs for road users, and a lower life-cycle cost for the road asset. Overall, the project aims to enhance connectivity within BiH and with neighboring countries, facilitate access to markets, and support the country's EU accession process. It will also contribute to the growth of the tourism industry in the area and improve domestic connectivity and network resilience. Project is organized in 2 components and a number of sub-components (full description is available in the Annex F).

### 1.2.1 Contingent Emergency Response Component (CERC)

The Project also includes Contingent Emergency Response Component (CERC) which is a financing mechanism designed to provide rapid access to funds in the event of a crisis or emergency. CERCs can be activated to reallocate uncommitted funds to address urgent needs without requiring project restructuring. This mechanism ensures that borrowers can quickly access necessary funds to mitigate the adverse economic and social impacts of emergencies, thereby strengthening Country's resilience and response capacity.

As CERC component activities have not yet been defined, they are not a subject to Project-level E&S due diligence, including SEP procedures. However, mandatory ESF compliance extends to CERC. To ensure that the Project CERC component is implemented compliant to ESF, the borrower will prepare CERC Manual as specified the legal agreement (LA). The CERC Manual will include a general description of the E&S assessment and management arrangements including Sustainable Integrated and Safe Road Infrastructure Project CERC Addendum to ESMF and Project-level SEP in accordance with ESCP provisions. Definition of CERC Manual and CERC component E&S due diligence procedures (including but not limited to CERC Addendum to SEP, procedures related to preparation of CERC site-specific SEPs and consequently changes in GRM) will be guided by the Project-level SEP and ESMF E&S Review Procedures, and made fully complaint to ESF and WB EHS.

Component <sup>1</sup>	Component Description	Sub-component	Project activities
1 Improved Regional Connectivity	The overall objective of this component is to improve regional connectivity and the quality and sustainability of the magistral road network in BiH. A high quality, safe network is essential to provide reliable access to jobs, markets, and services in BiH and connectivity to neighboring countries. To this end, the component will finance: upgrade and improvement of Route 2b of the TEN-T network connecting Sarajevo (BiH) and Podgorica (Montenegro), and for the reconstruction, rehabilitation and maintenance of priority magistral roads.	1.1 Upgrade of Route 2b between Brod na Drini (Foca) and Hum (Scepan Polje)	<p>(i) Upgrade of 13.245 km between Brod na Drini (Foca) and Hum (Scepan Polje) on route 2b (M-18) to improve the connectivity between Sarajevo and Podgorica. This also includes addressing issues of active landslides and ongoing deformations of the road surface, wooden bridges, damaged bridges, and curvy alignment. The entire investment will be in RS and jointly financed through an EBRD loan and WBIF grant.</p> <p>(ii) Additional design work to enhance climate resilience as the road is vulnerable to flooding and landslides. The results from a GFDRR activity on Nature Based Solutions and Network Vulnerability Assessments will inform this process.</p> <p>(iii) A road safety audit will be undertaken to inform the final detailed design.</p> <p>The bridge over Tara canyon will be financed through BiH own resources before the start of works on the project road.</p>
		1.2: Investments in a program of rehabilitation of priority national roads	<p>(i) Carry out asset management system assessment and identify a priority list of rolling investments.</p> <p>(ii) Carry out road safety audits, technical control, designs, and site supervision of the sections to be financed under the subcomponent. All activities financed through this component will be complemented by a GFDRR grant to support integration of Nature Based Solutions into road designs and for the development of a methodology to assess road network vulnerability. The methodology for vulnerability assessment will be used to screen the country's road network for climate resilience considerations.</p> <p>(ii) Finance reconstruction, rehabilitation and maintenance of selected sections of priority magistral roads (identified by the RS program). In total, this sub-component will improve about 150 km of road and associated blackspot improvements and interventions to enhance climate resilience. The works will be undertaken along the existing alignment and will include resurfacing, partial pavement widening, works concerning traffic signalization improvements, structure renewal, road safety improvements, road protection works, and rehabilitation of bridges and tunnels as well ancillary connections i.e. crossroads, access roads, drainage systems, etc.</p> <p>(iii) The Project will support reconstruction/rehabilitation design and works of two bridges, tentatively selected: Bridge on the Drinjača River and Bridge Tatinac (highly unstable and deteriorated and will be repaired to enhance the safety and resilience of the road network). The scope of works can include bridge construction or rehabilitation and will undertake structural retrofits/reconstruction to withstand climate hazards.</p> <p>Technical Assistance (TA) activities relevant for the road upgrades with road safety and resilience consideration: (a) Update to the National Guidelines for design, construction, supervision, and maintenance and related rulebooks will be supported to reflect changes in the relevant standards and laws, and to allow adoption of modern practices in the transport construction sector; (b) Support establishment of a road crash database system as per CADaS protocols on the level of BiH and in close cooperation with the Ministry of Interior and Ministry of Health will be provided;</p>

<sup>1</sup> Full description of components is provided in the Annex F



Component 2: Enhanced Road Sector Governance	<p>This component will support the BiH EU accession and reform process in the transport sector through interventions that enhance road companies' ability to manage and operate their road infrastructure efficiently and cost effectively. The selected activities will strengthen road management in BiH with a particular focus on improving the financial sustainability of the road companies, streamlining climate resilience, and enhancing road safety.</p>	<p>Subcomponent 2.1: Improved safety and resilience of the BiH road network</p> <p>This subcomponent will support implementation of elements of the road safety ecosystem including screening and prioritization of blackspot locations and design and implementation of interventions. All activities are aligned with BiH accession agenda as identified in the EU aquis report for BiH. The subcomponent will be implemented through technical assistance, goods and services, training and operating costs</p>	<p>(i) Road Safety Inspection and Blackspot improvement program: RSI will be performed on priority 1200 km road network across BiH. Recommendations from the RSI will be included in the road safety action plans of the road companies and support in the development of a program for Blackspot improvement, particularly in the RS where there has been no prior screening. Measures will be proposed to rehabilitate the road sections near these high-risk locations.</p> <p>(ii) Stability monitoring: Develop a Slope Management System including landslides and facilities monitoring. This will include monitoring equipment, patrols, support with planned road closures, signing, periodic maintenance, and minor rebuilding to reduce vulnerability.</p>
		<p>Subcomponent 2.2: Enhanced operational management</p> <p>The subcomponent will finance technical assistance (TA), and procurement of goods and services to enhance the operational management of the roads sector in BiH. It will finance activities that support the institutionalization of modern road asset management system, a system of Weigh-in-Motion to protect existing assets from overloaded trucks, and the implementation of Intelligent Transport Systems (ITS) for tunnel management. The activities will support the development of multi-year maintenance plans based on priorities developed through RAMS designed to reduce the whole life costs of the road network and the overall financial sustainability of the sector.</p>	<p>(i) Enhancing the company level Road Asset Management Systems. The project will finance enhancements to the existing RAMs to integrate a module for the systematic economic prioritization of interventions. It will finance equipment for road condition monitoring, weather stations and screening of the network for optimal decision making and identification of network vulnerability. Further institutionalization of RAMs will be supported to help optimize multiannual planning and the preparation of investment and maintenance plans.</p> <p>(ii) Implementation of a BiH wide Weigh-in-Motion system: Introduction of a weight control system will support the country in addressing overloaded trucks causing premature failure of roads. The project will finance the equipment necessary for a mixture of mobile weight control systems and fixed weigh-in-motion (WIM) systems. TA will support drafting the necessary legislation to facilitate the operations and enforcement of such a system.</p> <p>(iii) Implementation of ITS in selected tunnels: The subcomponent will support higher utilization of ITS by centralized monitoring and control of ITS systems in tunnels.</p>
		<p>Subcomponent 2.3: Project Management and Capacity building</p>	<p>Engagement on a need basis of additional experts to ensure implementation in line with WB policies (e.g. procurement, financial management, environmental and social safeguards, etc.);</p> <p>Support to relevant training and knowledge exchange activities and operating costs like office equipment, travel, printing and translation costs.</p>

		<p>This subcomponent will finance eligible expenses for both companies to enable successful implementation of the Project.</p> <p>The project will be implemented by the road company employees but they can benefit from capacity building and selected additional expert support as may be necessary in procurement, financial management, environmental and social safeguards and annual program planning.</p>	<p>Cover cost of 30 paid internships, out of which sixty percent will be women. Paid internships will be granted to students from the final year of relevant faculties or recently graduated students, enabling the companies to identify candidates that could be good addition to their institutions.</p> <p>Establishment of the online platform for dissemination of information about the project and user feedback interface.</p>
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Table 1: Project Components and Activities

Table 2: Project activities in municipalities/cities

Municipality/ City	Activity	Description of Municipalities/Cities
M18 - 13.245 km between Brod na Drini (Foca) and Hum (Scepan Polje)	<p>1. Upgrade of 13.245 km between Brod na Drini (Foca) and Hum (Scepan Polje) on route 2b (M-18) to improve the connectivity between Sarajevo and Podgorica. This also includes addressing issues of active landslides and ongoing deformations of the road surface, wooden bridges, damaged bridges, and curvy alignment.</p> <p>2. Consulting services for preparing additional design work to enhance climate resilience as the road is vulnerable to flooding and landslides.</p> <p>3. Consulting services to undertake road safety audit to inform the final detailed design.</p>	<p>Foca is a municipality located in the eastern part of Bosnia and Herzegovina, located along the Drina River, near the border with Montenegro. It is part of the Republika Srpska entity. The wider area is characterized by its rugged terrain, with the Tara and Sutjeska National Parks nearby, which are home to diverse flora and fauna, including the last remaining primeval forests in Europe and the endangered Balkan Lynx. Foca is also known for its rich history, with cultural heritage dating back to the medieval period, this includes the UNESCO-listed Mehmed Pasa Sokolovic Bridge in nearby Visegrad. The town has been subject to significant historical events. Today, Foca is a center for outdoor sports and tourism, attracting visitors for rafting, hiking, and exploring its natural beauty and historical sites. The area is prone to climate change effects such as increase occurrences of droughts, storms, soil erosion and landslides.</p>
Bridge over Drinjaca River	Reconstruction/improvements/rehabilitation of bridge over Drinjaca River as part of the 1.2 sub-component activities on specific blackspot improvements.	<p>The bridge over the Drinjača River identified as a candidate for blackspot improvement is located on the road section Tišća - Vlasenica, in the eastern part of the Republic of Srpska, in the area of the Municipality of Vlasenica. The municipality of Vlasenica is located in the eastern part of the Republic of Srpska, belongs to the Sarajevo-Zvornik region, in the part of the middle Podrinje, on the northern slopes of the mountain Javor, in the area of slightly stratified plateaus, river flows and forest areas.</p> <p>The existing bridge is in extremely poor condition, does not meet the needs of safe traffic flow and does not meet the requirements of the required load capacity. It represents a significant point for the network of transport and socio-economic aspects on the so-called "eastern direction" that stretches from Bijeljina, through Zvornik, Vlasenica, Han Pijesak, Sarajevo, Foča, Gacko to Trebinje.</p> <p>More broadly looking at the natural and economic macro regions, the position of Vlasenica is characterized by the convenience of connecting these regions and the transit tourism where the tourist flows are directed through Vlasenica to the Montenegrin coast from direction of Belgrade, Novi Sad and other towns of that part of Serbia, as well as in the winter period towards the Olympic mountains Jahorina and Bjelašnica.</p>
Bridge over Tatinac	Reconstruction/improvements/rehabilitation of bridge over Tatinac River as part of the 1.2 sub-component activities on specific blackspot improvements. The bridge is wooden and dates from Austro-Hungarian Empire time.	<p>Tatinac river is located in Kalinovik, a small municipality in RS, Bosnia and Herzegovina. It is situated in a mountainous region, surrounded by the high peaks of the Dinaric Alps, which provide a stunning natural backdrop. The area is sparsely populated, with a landscape that is both rugged and beautiful, featuring rolling hills, clear streams, and rich forests that offer a habitat for diverse wildlife. Historically, Kalinovik has been a pastoral region, with sheep farming being a significant part of the local economy. The town itself is modest, with a collection of traditional homes and a few modern amenities. It has a rich history that is reflected in its architecture and cultural monuments. Despite facing challenges related to its remote location and the legacy of past conflicts, Kalinovik is working towards developing its infrastructure and promoting eco-tourism to showcase its pristine environment and cultural heritage; however, the bridge itself is not protected as cultural heritage nor it is located in nature protected site.</p>
RS	All other activities have not identified tentative or actual locations.	<p>Republika Srpska (RS) encompasses diverse landscapes, from the flat, fertile plains of the Sava River basin to the mountainous terrains of the Dinaric Alps. The entity's capital and largest city is Banja Luka, a cultural and economic center. Republika Srpska has a predominantly Serb population (82.95%). Other nationalities include Bosnians (13.99%), Croats (2.41%), Slovenians, Russians, Ukrainians and Roma,</p>

		<p>but in much smaller percentage.</p> <p>Economically, Republika Srpska is developing, with industries such as energy, agriculture, and forestry playing key roles. It also has potential for tourism, with attractions like the Sutjeska National Park, home to the Perućica rainforest, and the Mehmed Pasa Sokolovic Bridge in Visegrad, a UNESCO World Heritage site.</p>
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### 1.3 Summary of Potential Environmental and Social Impacts

This project is rated as Substantial risk for environment and social due to the potential nature of the sub-projects’ environmental and social aspects and potential impacts including civil works and the potential impact of Technical Assistance (TA) Project elements downstream. The pre-construction phase of the M18 Sarajevo – Podgorica road project involves updating plans for road rehabilitation and construction to enhance climate resilience and safety. The project includes new road sections between Brod na Drini and Hum to improve alignment and bypass urban congestion, expected to be around 2km.

Civil works include construction, reconstruction, rehabilitation, and maintenance of roads and structures like bridges and tunnels. Technical assistance covers design, safety inspections, and other activities. Risks are expected to be diverse. Larger construction works entail risks of dust, noise, and vibrations, pollution from bridge and tunnel operations, and keeping hazardous materials like fuel and oils at site, use of large quantities of mineral materials, generation of waste, and other typical for civil works in transport sector. Long-term water disturbance from bridge works and soil disturbance from new alignments and bypasses could occur, potentially causing landslides and soil erosion. Occupational health and safety risks include injuries from falls, working at heights, and handling heavy machinery and chemicals. Climate change adds risks of heatstroke, dehydration, and storm-related dangers.

Community health and safety risks include mainly traffic disturbances and accidents, leading to additional transport costs and increased accident risks. Construction-related dust and noise pose health risks, especially in populated areas. The project is likely to generate substantial waste, including construction debris, contaminated materials, and biodegradable waste. Invasive plant species, if used for re-greening could negatively impact the environment. Some routes may affect protected areas or cultural heritage sites, impacting wildlife and habitats, but habitat fragmentation risk is low as new routes largely follow existing roads. Long-term, the project aims to improve road durability, traffic safety, and economic access. Adverse impacts are expected to be short-term, with long-term negative effects unlikely if mitigation measures are timely and effective.

The operational phase of the M18 Sarajevo – Podgorica road project involves several risks, despite the majority of work occurring on existing roads with minimal new construction. Positive impacts are expected, such as safer and faster traffic, improved connectivity, and better market access for rural areas. Traffic safety remains a concern, with Bosnia and Herzegovina’s road fatality rates being high compared to EU countries. The project aims to reduce this through addressing blackspots, improving landslide and soil erosion resistance, and enhancing road longevity with better drainage and weight-in-motion systems.

Community health and safety impacts in the operational phase are anticipated to be low in terms of noise and vibrations, as most roads are pre-existing. Bypasses will divert traffic from urban centers, which is expected to reduce noise pollution. Noise monitoring will be in place, with mitigation measures ready (defined in the site-specific ESMPs) if limits are exceeded. Improved road conditions should also decrease vibrations, and efficient drainage will reduce frost damage and erosion.

Risks from accidental situations, particularly the transport of dangerous goods in the operation phase, pose a significant threat to soil, groundwater, and human health. Regulations are in place in RS for the transport of hazardous materials, with mandatory measures to prevent accidents and minimize consequences. In case of an accident, immediate reporting and cooperation with authorities are required, with rescue and protection organized under relevant laws.

Waste management during operation will involve various types of waste, including construction debris, metals, car wrecks, and hazardous materials. Waste will be managed according to national laws, with separate collection and processing. Hazardous waste is likely to be exported in compliance with the Basel Convention.

Soil and water impacts are mainly from winter maintenance and runoff management. Poorly positioned drainage can cause

infrastructure damage, water turbidity, and soil degradation. Winter maintenance involves the use of salts and gravel, which can alter soil and water chemistry and mobilize heavy metals, potentially affecting local water and food sources. Mechanical snow removal applied whenever possible is suggested as a remedy to reduce salt usage.

## 1.4 Population in the tentative locations

As design of road rehabilitation and upgrades is not known, as well as all locations, based on the nature of the Project, it is assumed that there may be temporary closing of roads, there may be a slowdown of traffic or temporary unavailability of services (medical services, care services, mobile stores, library buses, etc.) that can impact human health and quality of life. In addition, it is possible that due to road features and safety upgrades would cause inability to use some traditional means of transport such as horse-carriage or horses for timber transport, as well as lose the existing access to road (e.g. as is unsafe or because construction of water collection system or installation of protective rails, or other road furniture). If alignment is changed, there may be loss of land (permanent), but also temporary loss of access to land, water, rivers, forest products resulting in the loss of livelihood. However, it is expected that the long-term impacts will be positive, including improvement of safety of travel, reduced number of accidents and casualties, creating conditions for faster economic development, especially tourism, etc.

### 1.4.1 Settlements in the vicinity of the Project location M18 Brod na Drini – Hum (sub-component 1.1)

Table 3: Number of population in the project coverage<sup>2</sup>

No.	INHABITED PLACE	TOTAL NUMBER OF REGISTERED PERSONS	TOTAL NUMBER OF HOUSEHOLDS	TOTAL NUMBER OF APARTMENTS
1	Brod	403	157	191
2	Bunovi	78	35	133
3	Birotići	23	14	27
4	Čelikovo Polje	-	-	9
5	Mazoče	31	16	33
6	Bastasi	17	7	19
7	Tečići	19	6	13
8	Hum	15	-	25
<b>TOTAL</b>		<b>586,00</b>	<b>235,00</b>	<b>450,00</b>

## 1.5 Project Implementation Arrangements

Project Implementation Unit will be established within Putevi Republike Srpske Public Company to implement Sustainable, Integrated and Safe Road Transport in Republika Srpska. Putevi Republike Srpske will be responsible for implementing all components and for reporting to both the World Bank and the Project Steering Committee on all Project activities and progress. The PIU will be responsible for project coordination, monitoring, and the preparation of consolidated reports. It will oversee overall implementation, including functions such as procurement, technical inputs, progress monitoring, quality control, and compliance with social and environmental safeguards (ESF), including the implementation of ESMF, SEP, LMP, and ESCP. The PIU will coordinate with other relevant competent authorities such as Putevi Republike Srpske legal department, RS Motorway Company, Ministry of Physical Planning, Construction and Ecology, Ministry of Interior, and non-government organizations.

The World Bank will provide support for the overall implementation of the project. This support will involve close cooperation with the Project Implementation Units (PIUs), review of environmental and social (E&S) due diligence documents, monitoring of E&S aspects of implementation performance and progress, conducting regular implementation support missions, provision of trainings and facilitating knowledge exchange, as well as supervision and support for the procurement process and financial management.

The World Bank will also provide training on ESF and relevant standards to build the capacity of the PIU E&S Specialist and

<sup>2</sup> Census of population, households and apartments in BiH in 2013, in the territory of the Republika Srpska - Preliminary results; Preparation of design and studies for improvement of the road on the SEETO route 2b, EIA for Component 1; 2016

relevant PIU staff. They will guide them in the preparation, implementation, and supervision of all project environmental and social instruments. Additionally, the Putevi Republike Srpske PIU will provide training on the implementation of environmental and social due diligence documents to all staff working with contractors and sub-contractors, supervising engineers, OHS specialists, etc.

## 2 PURPOSE AND OBJECTIVES OF THIS SEP

The Sustainable, Integrated and Safe Road Infrastructure Project is being developed in accordance with the World Bank's Environment and Social Plan (ESP). In line with Environmental and Social Standard ESS10 on "Stakeholder Engagement and Information Disclosure", it is required that the implementing agencies provide stakeholders with timely, relevant, understandable, and accessible information and engage with them in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation.

The main goal of this Project-level Stakeholder Engagement Plan (SEP) is to establish a framework for engaging with stakeholders, including public information disclosure and consultation, throughout the entire project cycle. The Project-level SEP details how the Project team (PIU) will communicate with stakeholders and includes a process for stakeholders to be timely informed, raise concerns, provide feedback (or be provided a feedback), or file complaints about the project and related activities. The participation of the local population is crucial for the success of the project to ensure effective collaboration between project staff and local communities, integrate needs and interests of the relevant communities and individuals into Project goals, to minimize and address environmental and social risks associated with the proposed project activities, and ultimately reach material and non-material objectives of the Project and Project Environmental and Social Commitment Plan (ESCP) in the manner compliant to WB ESF, therefore acceptable to the WB .

### 3 REGULATIONS AND REQUIREMENTS

#### 3.1 National Requirements

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 RS public consultations are legally required within the procedure for developing spatial planning documentation, as well as issuing of Environmental Permits and Construction Permits. Table 4 below contains overview of legal requirements for the public participation relevant for this Project.

Table 4: RS legal requirements for the public participation relevant for this Project

Republika Srpska	
<i>Law on Access to Information in RS (OG 20/01)</i>	<p><b>Free Access to Information</b></p> <p>The Law establishes the general right of the public to access information that is under the control of public authorities “as far as possible in the public interest”. This Law facilitates and promotes, to the greatest extent, and without delay, the publication of information under the control of a public authority, at the lowest acceptable price.</p>
<i>Law on Local Government of the RS (OG 97/16 and 36/19)</i>	<p><b>Principles of Local Government and public information</b></p> <p>This Law regulates the system of local self-government, local self-government units, manner and conditions of their formation, affairs of local self-government, bodies of local self-government units, mutual relations of the local self-government unit and the mayor, i.e. property and financing of local self-government units, acts and public work of local self-government units, the procedure of supervision over the work of local self-government units, forms of direct participation of citizens in local self-government, cooperation of local self-government units, the relationship between republic bodies and local self-government units, protection of local self-government rights and other issues exercising the rights and duties of local self-government units.</p> <p>The local self-government unit provides information and public information on issues of importance for the life and work of citizens in its area.</p> <p>The bodies of the local self-government unit ensure the publicity of work by regularly providing information to the media, by regularly holding press conferences, by regularly publishing data on the number of employees in the city or municipal administration by category of employees, by providing conditions for unhindered informing the public. changes in the organization, scope of work, schedule of working hours and other changes in the organization and work of the city or municipal administration</p>
<i>Law on Environmental Protection of the RS (OG 71/12, 79/15 and 70/20)</i>	<p><b>Public consultations during Environmental Impact Assessment (EIA) procedure</b></p> <p>This Law regulates the protection of the environment in order to preserve it, reduce risks to human life and health, and ensure and improve the quality of life, protection of all elements of the environment, information and access to information in the field of environmental protection, planning and environmental protection, strategic assessment environmental impact assessment and assessment, the process of issuing environmental permits and preventing large-scale accidents, the eco-labeling system and environmental management, the financing of environmental activities, liability for environmental damage, as well as the rights and obligations of legal and natural persons performing activities determined by this Law.</p> <p>Each individual and organization must have adequate access to environmental information held by public authorities, including information on hazardous substances and activities in their communities, as well as the opportunity to participate in decision-making.</p>
<i>Law on Public Enterprises of the RS (OG 75/04 and 34/06)</i>	<p>This Law regulates the <b>business and management of public companies in the Republika Srpska</b>, company bodies, conflicts of interest with the company, code of ethics, internal procedures, illegal and restricted activities and other issues of importance for the work of these companies.</p> <p>Public companies are obliged to make information about their financial and organizational structure available to the public, through the company's website or in another adequate way</p>
<i>Law on Spatial Planning and Construction of the RS (OG 40/13 and 2/15)</i>	<p><b>Public consultations during the issuing of construction permits</b></p> <p>This Law regulates the system of spatial planning and spatial planning, preparation, preparation and adoption of</p>



	<p>spatial planning documents, location conditions, construction land development, issuance of construction permits, types and content of technical documentation, construction of facilities and mutual relations between construction participants, use and removal of buildings, legalization of buildings, supervision over the application of this law, competence and work of the Chamber of Engineers, and other issues of importance for spatial planning, construction land and construction of buildings.</p> <p>The Government of the Republika Srpska shall issue a decree on the electronic procedure for the exchange and processing of documents and data when issuing location conditions, construction and use permits.</p> <p>The investor of the construction of the facility on the city construction land cannot be issued a construction permit until he submits proof that the determined compensation for the costs of arranging the city construction land and rent has been paid.</p>
<p><i>Law on Public Roads of the RS (89/13 and 83/19)</i></p>	<p>This law regulates the <b>legal status of enterprises acting as road managers</b>, the way of using public and uncategorized roads; management, financing, planning, construction, reconstruction, maintenance and protection of roads; concessions on public roads; realization of public-private partnership and supervision over implementation of this law.</p>

### 3.2 World Bank Requirements

The World Bank has reinforced its commitment to sustainable development through its Environmental and Social Framework ("the Framework" or ESF) which took effect in October 2018. This framework outlines 10 mandatory environmental and social (E&S) standards that borrowers must adhere to when preparing, implementing/constructing or using World Bank supported infrastructure or services. The application of these standards is believed by the World Bank to help borrowers in reducing poverty and increasing prosperity in a sustainable manner, benefiting the environment and citizens. One of these E&S standards is Stakeholder Engagement and Information Disclosure (ESS10), which focuses on stakeholder engagement. This standard emphasizes the importance of open and transparent engagement between the borrower and project stakeholders as a fundamental element of good international practice.

The objectives of ESS10 are as follows:

1. Establish a systematic approach to stakeholder engagement to help borrowers identify stakeholders and build and maintain a constructive relationship with them, particularly project-affected parties.
2. Assess stakeholder interest and support for the project and consider stakeholders' views in project design and environmental and social performance.
3. Promote and facilitate effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
4. 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.
5. Provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond to and manage such grievances.

ESF distinguishes three main types of stakeholder engagement, depending on the Project life-cycle phase: Project-level SEP that is prepared during Project preparation, as a part of overall Project E&S Due Diligence, site-specific SEPs that focus on subproject preparation (during Project implementation) and target site-specific activities and investments, including social impacts and related information dissemination and consultation needs, and SEP Implementation Reports that assess success of SEP-defined measures and actions, and are prepared during sub-project implementation. In accordance with the ESF, the Project level Stakeholder Engagement Plan (SEP), as well as site-specific Stakeholder Engagement Plans (SEPs) (tailored and prepared based on SEF-set guidelines), shall be tailored proportional to the nature, scale, and potential risks and impacts of the project. It should be disclosed (and finalized) as early as possible, in the case of Project-level SEP - prior to project appraisal, and the site-specific SEP shall be prepared, disclosed, consulted and finalized before bidding of the sub-project/activity (or finalization of the offer if the selection process does not include bidding). The Borrower should seek the input of stakeholders on the Project-level as well as site-specific SEP, including the identification of stakeholders and plans for future engagement. Any significant revisions to both types of SEP must be disclosed by the Borrower.

Site-specific SEPs are following procedures and (revisit and update) stakeholder lists defined in the project SEP and provide their further and in-depth analysis providing a detailed roadmap and practical plan on number, timeline, target groups, type of media, appropriate channels for engagement, discussions, as well as feedback provision, and other elements of stakeholder and public consultations and information dissemination specifically tied to the particular activity/investment/sub-project. Site-specific SEP will ensure that those (i) that are affected or likely to be affected by the

project (project-affected parties); and (ii) may have an interest in the project (other interested parties), are adequately and more specifically identified and engaged, and their concerns addressed and integrated to project results. SEP activities may include, but are not limited to public meetings, mass and social media platforms, informational materials, information desk and hotlines, training and workshops as well as satisfaction surveys. All stakeholder activities will be led by a principles of meaningful and early stakeholder engagement.

Preparation of the site-specific SEPs, prepared for sub-projects/specific investments will start as soon as the sub-project scope, technologies, activities and its specific location is known. As a first step, SEP will identify geographical scope of potential impact and relevant stakeholder groups present. These aspects will inform targeted stakeholder engagement programs, methods and means, the budget and desired level of engagement, which largely depend on the Sub-Project details, including the footprint, geographic location and timing of the Project activities.

The development of site-specific SEPs will start and be based on a screening to ensure relevant information that may be useful to understand the characteristics of people/communities that will be impacted by the project is included. This may include, but not limited to: environmental data, census data, socio-economic data (information on income, employment), gender data and other, and their implications from an environmental and/or social point of view will be explained. The Project description shall be kept targeted and relevant to understand the types of stakeholder groups impacted by the project. site-specific SEPs will include description and details of all consultations, that include at minimum – early consultations and SEP/ESMP public consultations. SEP will provide overview and key inputs of consultations including how early stakeholder input has influenced project design shall be included in the SEPs, lessons learned on any prior stakeholder engagement activities from past projects or ongoing similar projects, list of identified stakeholders and their analysis and will ensure that those that were identified as project-affected parties and interested parties are included in adequate type of engagement. Site-specific SEPs will further define languages of engagement, methodologies for information collection and dissemination and medias, means of engagement, timelines and describe any specific requirements or culturally appropriateness and envisaged potential constraints. It will also provide overview of public domain.

The site-specific SEPs will also expand and add a practical aspects to Project GRM procedures.

Additionally, the Borrower will establish and implement a grievance redress (and feedback) mechanism (GRM) to receive and address concerns and grievances from project-affected parties regarding the environmental and social performance of the project and sub-projects in a timely manner. The outline of site-specific consultations is available in the Annex X.

The World Bank (WB) places particular emphasis on effective, inclusive, and genuine citizen engagement through the disclosure of project-related information, consultation, and feedback mechanisms. Projects should incorporate activities designed to engage citizens and beneficiaries. The interaction between the government and citizens should be two-way, meaning that citizens should be involved in the decision-making process. When citizens provide input or feedback, the government should consider these views, address the raised issues, and provide feedback to the citizens. Empowering citizens to participate in the development process and integrating their voices in development programs is crucial for achieving positive results.

Before the introduction of ESS10 in 2014, the World Bank Group (WBG) developed a [Strategic Framework for Mainstreaming Citizen Engagement in WBG Operations](#) to systematically integrate citizen engagement in WBG-supported operations. Citizen engagement is defined within this framework as the two-way interaction between citizens and governments or the private sector within the scope of WBG interventions. This approach gives citizens a stake in decision-making to enhance intermediate and final development outcomes.

In practical terms, the World Bank's commitment to citizen engagement requires that all Investment Project Financing (IPF) operations financed with IBRD loans or IDA credits meet three criteria:

1. Project design should be oriented towards citizens, with at least one mechanism to engage beneficiaries in the specific project context.
2. Projects' results frameworks must include at least one beneficiary feedback indicator to monitor citizen engagement throughout project implementation. The indicator should demonstrate two-way citizen engagement, where the government responds to citizen inputs or feedback in some form, addressing citizens' views, resolving raised issues, or publishing a response to the feedback.
3. Projects must report on the beneficiary feedback indicator(s) by the third year of implementation.

## 4 PREVIOUS STAKEHOLDER ENGAGEMENT

### 4.1 Summary of Stakeholder Engagement Done During Project Preparation

Previous activities on the Project were done for the Sub-component 1.1. Upgrade of Route 2b between Brod na Drini (Foca) and Hum (Scepan Polje).

Regarding environment these activities include preparation of Preliminary Environmental Impact assessment (PEIA) and Environmental Impact Assessment (EIA), which were conducted by consulting firm AECOM INOCSA S.L.U. and Civil Engineering Institute „IG“ Banja Luka, in 2015. and 2016. Namely, the Client of these studies, as well as other previous studies (Feasibility Study, Traffic Study etc.) and technical documentation (Conceptual Design, Main Design) was the Delegation of the European Union in Bosnia and Herzegovina. Terms of Reference was written in 2013. by the Delegation of EU in BiH.

Since the emphasis of the PEIA and EIA was on the environment and less on the social part, these documents were not publicly reviewed or consulted. It has been recognized that public and stakeholder engagement is an effective tool to ensure project success and recognition. Hence, the project will utilise all tools, as per this SEP, to actively and meaningfully engage all identified stakeholders during the entire Project life cycle.

Project of reconstruction on the route 2b: road section Brod na Drini (Foca) – Hum (Scepan Polje) was mentioned a lot in media, due to its international importance. Local municipalities were highly interested in the project which realization would be significant for development of this rural areas.

It is concluded that the project was well received by the interested parties, and that future engagement will be recognized as a benefit for the entire area.

## 5 STAKEHOLDER DEFINITION AND IDENTIFICATION

### 5.1 Introduction

ESS10: Stakeholder Engagement and Information Disclosure, is a part of the World Bank's 2016 Environmental and Social Framework (ESF) and provides guidance for the Borrower on the application of environmental and social standards in the area of consultations and information disclosure. The objective of ESS10 is to assess the level of stakeholder interest and support for the project, enable stakeholders' views to be taken into account in project design and environmental and social performance, and 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. It also aims 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. Additionally, ESS10 provides project-affected parties with accessible and inclusive means to raise issues and grievances, and allows Borrowers to respond to and manage such grievances.

In summary, ESS10 emphasizes the importance of stakeholder engagement and information disclosure throughout the project life cycle to ensure that stakeholders' views are considered in project design and implementation, and that project-affected parties have accessible means to raise issues and grievances.

**Project stakeholders** can be defined as individuals, groups, or entities who:

- (i) are directly or indirectly impacted, positively or adversely, by the Project (also known as 'affected parties'); and
- (ii) may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence Project outcomes in any way.

Throughout the Project development, cooperation and negotiation with stakeholders often involve identifying legitimate representatives within the groups, i.e., individuals entrusted by their group members to advocate for the group's interests in engagement with the Project. Community representatives can offer valuable insight into local settings and act as key conduits for disseminating Project-related information, serving as the primary communication link between the Project and targeted communities and their established networks.

ESS 10 recognizes two broad categories of stakeholders: 1) Project Affected Parties and 2) Other Interested parties. **Project-Affected Parties (PAPs)** include those likely to be affected by the project because of actual impacts (positive and negative) or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project. The term "**Other interested parties (OIPs)**" refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

Categories "affected parties" and "other interested parties" can be divided into two broad groups: i) citizens/ citizen groups (including informal community groups, civil society organizations (CSOs), and non-governmental organizations (NGOs), and ii) government/state actors, donors and other institutions (media, businesses); whereas "vulnerable persons/ groups" always fall under the category of citizens/ citizen groups.

### 5.2 Definition and Identification

As per ESS10, Aarhus convention and other relevant regulation and guidelines, the project will adhere to the following five principles for engaging stakeholders:

1. Principle of openness: Public consultations for the project(s) will be carried out openly and transparently, free from external manipulation, interference, coercion, or intimidation.
2. Project life-cycle principle: Public consultations will take place continuously, throughout the entire life-cycle of the Project.
3. Informed participation and feedback principle: Information will be provided to all stakeholders in a format that is easily accessible and understandable, and opportunities will be given for stakeholders to relatively easily provide feedback, considering their specific circumstances. Comments and concerns will be carefully analyzed and addressed.

4. Inclusion principle: Stakeholders will be identified and invited to participate to improve communication and build effective relationships with the Project and other stakeholders. The participation process will be inclusive, and all stakeholders will be encouraged to take part in the consultation process as much as current circumstances allow. Equal access to information will be provided to all stakeholders.
5. Cultural appropriateness and meaningfulness: Engagement with stakeholders will be carried out in a meaningful way. Stakeholders will be provided timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner. The selection of engagement methods will be guided by sensitivity to stakeholders' needs and particular circumstances. Special attention will be paid to vulnerable groups, particularly women, youth, poor, the elderly, and the cultural sensitivities of diverse ethnic groups.

For the purposes of effective and tailored engagement, stakeholders of the proposed project are divided into three core categories as explained in Table 5 below. The list of identified stakeholders for each group is provided in Table 5.

Table 5: Stakeholder categorization

Stakeholder category	Definition	Broad stakeholder groups identified for the project
<b>Project Affected Parties (PAPs)</b>	Individuals, groups or other entities who are impacted or likely to be impacted directly or indirectly (actually or potentially), positively or adversely, by the project 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. On the M18 part of the road route Brod na Drini – Hum, financed under sub-component 1.1 settlements are scarce and largely inhabited due to rough terrain. More information is available in the Chapter 11.6.	Citizens/ citizen groups: Local communities - Project Beneficiaries Local communities – people living in the Project areas, affected by the Project, not necessarily using the roads Professional drivers Owners of transport businesses Other drivers using the roads that are a subject to this Project (e.g. commuters and tourists) People affected by land acquisition Local businesses affected by roadworks/closures in particular tourism and hospitality businesses Local population affected by restricted access to land and other livelihood sources (including ecosystem-services) Local population affected by impeded access to goods and services (e.g. health services) Construction workers Foreign workers (migrant workers and workers without a citizenship) Maintenance companies  Government actors (Putevi RS, Municipal and City Departments for Physical Planning, roads, construction, environmental and social issues, etc.)
<b>Other interested parties</b>	Individuals, groups or other entities who may have an interest in the Project. These stakeholders may not experience direct impacts from the project but consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.	Government actors at all levels (RS ministries of finance, public companies managing road infrastructure, inspection authorities, etc.) Citizens/ citizen groups (civil society organizations) International development partners and donors
<b>Vulnerable persons/ groups</b>	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.	Under-represented, disadvantaged individuals or groups who may be difficult to reach, illiterate or not be within the formal economy or housing market, e.g. women, older people, parts of Roma population, very poor, migrants. The listed groups are heterogenic therefore, the more detailed classification, identification of informational needs and adequate type of communication is going to be made on case-to-case basis in site-specific SEPs.

The list of identified stakeholders is based on these three categories and presented in the Table 6 below. It should be noted that this (Project-level) SEP is a “living document” which will be updated regularly throughout the project life as appropriate, including the list of identified stakeholders. However, it will still function as a framework while detailed site-specific SEPs will tailor concrete measures for meaningful consultations and citizen’s engagement related to concrete project activities.

Putevi RS is not considered a stakeholder in the sense of SEP, as it is the project implementing agency.

Table 6: Identified project stakeholders

Specific stakeholders identified		Interest in the Project
<b>Affected parties</b>		
<b>ens/citizen groups</b>	Local communities in municipalities Foca, Kalinovik and Vlasenica, and other municipalities directly impacted by the Project. This includes residential associations.	The impact of the Project implementation on the life and work of residents in local communities, covered by the realization of the Project.
	People living in the nearby of the Project implementation locations, including municipalities of Foca, Kalinovik and Vlasenica	Impact of the Project implementation on the population and residential buildings, which are located in the immediate vicinity of the Project locations. Individuals and household likely to observe changes from the environmental and social impacts of the project activities during their implementation stemming from civil works. These Project Affected Parties (PAPs) are likely to be affected by disturbances caused by the Project’s heavy vehicles traffic, construction impacts, noise and vibrations, road closures (either partial or full), changes in speed, safety furniture (that may bloc current entrances/exists to the road), etc., but may also benefit from project-related employment opportunities. Information on road regulation, closures, design, etc.
	People affected by land acquisition	Information about loss of assets attributable to the implementation needs of the Project activities.
	People affected by restricted access to land	Information about loss of livelihood attributable to the implementation needs of Project activities
	People affected by restricted access to goods and services	Information about compensation or alternative supply attributable to the implementation needs of Project activities.
	Construction workers	Occupational health and safety issues, labor rights, healthcare
<b>Governmental/public actors</b>	Putevi RS	Participation in the realization of implementation and project works. Improvement of sustainability and safety of roads.  Informing the citizens about the Project activities, and coordinate with involved Municipalities. Lead the stakeholder engagement activities at the municipal and community level during land acquisition and construction works, coordination with the Municipalities on the outreach activities. Appointing the focal point(s) for GRM.
	Municipalities of Foca, Kalinovik and Vlasenica, as well as other (currently unknown) where Project will be implemented - Spatial planning and environmental protection services	Participation in the realization of the Project, informing the citizens about the Project activities. Administratively manage the land acquisition process. Participate in stakeholder engagement activities at the municipal and community level during land acquisition and construction works, coordination with the Putevi RS on the outreach activities, local focal points for GRM.
<b>Other interested parties</b>		
<b>Governmental/public actors at all levels</b>	Ministry of Finance of the RS	Loan oversight at RS level
	Ministry of Finance and Treasury in BiH	Borrower BiH budget financial management, inclusion of BiH guarantees, authorized persons for disbursement.

	Ministry of Spatial Planning, Construction and Ecology of the RS	The main authority for spatial planning and construction and environmental permitting (EIA approval) at the RS level.
	Ministry of Health and Social Welfare of the RS	In the case of accidents, proposing corrective measures related to the OHS and labor-rights; Experienced in communication and assistance to vulnerable groups, participates in baseline surveys
	Ministry of Trade and Tourism	Keeps database of tourism and hospitality businesses, participates in baseline surveys
	Ministry of Education and Culture	Competent authority in cultural heritage preservation; Issues conditions or cultural heritage preservation and organizes and processes chance findings
	World Bank	The main investor, Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives
Financing Organizations	EBRD	Additional investor.
Citizens/citizen groups	Union of Municipalities and Cities	The impact of the Project implementation on local communities, covered by the realization of the Project. Project requirements and conditions that administrative services should meet in order to implement the Project.
	Road management companies in RS (municipal road companies)	Participation in the realization of the project, Provision of technical support to Putevi RS
	RS, BiH, Montenegro level media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder Engagement
	NGO in the RS	Protection of water areas, natural areas and biodiversity in the locations of the Project implementation.
	Construction workers/Trade unions	Occupational health and safety issues, labor rights
	Social service providers – hospital services, nurses, social welfare	Short term adverse impacts include increased amounts of time to provide services, increased costs of providing the service, costs of alternatives in provision of services. Long-term benefits of reduced cost of providing services.
Trade Associations and Chamber of commerce	Associations in hospitality and tourism industry	Short term loss of revenue and long term benefits from easier access to tourism/recreational/hospitality sites
<b>Vulnerable groups</b>		
<b>Disadvantaged/vulnerable individuals or groups</b> are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project		Affected by changes in road qualities, affected by works, potentially with impeded access to transport, impeded access to livelihood. Potentially employed as part of Contractor's workforce or otherwise benefit from works. Participation in giving feedbacks about their issues, problem regarding the water services and sanitation conditions.

### 5.3 Disadvantaged/ Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Such groups are also more likely to be excluded from the consultation process. In addition to groups and individuals that are easy to detect, it also includes groups who may be difficult to reach due to communication barriers or other reasons (language, illiteracy, travelling, reside elsewhere) and those who are in the informal housing market or informal economy and those who are very poor and may find it hard to pay regular tariffs.

Disadvantaged / vulnerable individuals or groups in the project area may include “low-income households”; women; youth; women-headed households; elder-headed households ( $\geq$  pension age) without any other household member bringing in income; persons with limited mobility; or persons with disabilities, women in rural communities, Roma groups, individuals and habitat communities. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts. The Roma population is categorized among the most vulnerable social groups, and Roma women, in particular, as they are less educated than Roma men. In case they have a job, which is very rare, it is usually some unregistered and lower paid job. However, this is not the case everywhere as Roma present a heterogeneous groups with different levels of integration to local communities. In many places Roma communities use the local (Serbian, Bosnian, Croatian) language rather than Romani language and dialects. Therefore, the communication and information approach to Roma as well as different vulnerable groups will need to be case-to-case and further defined in the site-specific SEPs.

Elderly citizens, retired, men and women of 65 and older, people with health issues and disabilities can be a good but underrated target group for citizen engagement. This is especially so if the areas are remote and services and goods are supplied in unusual ways e.g. mobile-shops, visiting nurse (e.g. making regular rounds), assistance to elderly, etc.

For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both (i) the Resettlement Plan if needed and the (ii) site-specific SEP, where needed adapting the engagement methods and approaches as designed in this SEP to bridge any engagement barriers stemming from vulnerability.



## 5.4 Gender Analysis, Actions and Indicators

Gender Equality Barometer of Bosnia and Herzegovina prepared by UNDP and BiH Ministry for Human Rights and Refugees, based on 2023 survey, highlights pervasive gender-based disparities in employment and decision-making roles. According to this survey, despite increased access to various occupations, women still face discrimination, particularly in managerial positions due to gendered family responsibilities. The majority of respondents agree that women experience discrimination related to family planning during job interviews and are often confined to lower-paid and less valued occupations. Additionally, women's family responsibilities hinder their career advancement, and they are underrepresented in higher-paying STEM fields. While both men and women believe that women are capable of holding leadership positions, there's still a prevalent belief that smaller family businesses are more suitable for women, and large companies are better managed by men. Gender-based stereotypes persist, affecting women even in higher positions. However, there's a shared belief that parental leave should be taken by both men and women to care for children. Despite these challenges, there is growing awareness of the need for gender parity in employment and family responsibilities.

The Law on Gender Equality in Bosnia and Herzegovina was adopted in May 2003 (amended in 2009, and 2010). This law regulates, promotes and protects gender equality and guarantees equal opportunities for all to citizens, both in the public and private spheres of society, and prevents direct and indirect discrimination according to gender. Full gender equality is guaranteed in all spheres of society, especially in the field of education, economy, and employment and work, social and health care, sports, culture, public life and media, regardless of marital and family status. Discrimination based on sex and gender orientation is prohibited.

The 2024 survey, though showing improvements in perception, largely corresponds to the 2015 World Bank Assessment of Gender Disparities in BiH which estimated that Bosnia and Herzegovina loses 16 percent of its gross national income due to gender disparities in labor force participation. Although the laws formally prohibiting gender discrimination, they are often not enforced due to inconsistencies in the system and traditional patriarchal social norms, e.g. women with higher education experience a longer waiting period to find work compared to men with equivalent education.

Statistics<sup>3</sup> indicate that gender inequalities in various aspects of participation in society are still very pronounced in Republika Srpska (RS):

- Political participation: Women are poorly represented in positions of political power and decision-making. Among the deputies of the National Assembly of the Republika Srpska, in 2015 women make up 21.7%, while this number increased to 26.83%<sup>4</sup> in the next elections; in the RS Council of Peoples, women make up only 14.8% of delegates, but make up almost a third of ministers (31.2%) in 2015. However, in some trades, that usually includes higher education, women are prevailing: e.g. in the Supreme Court of RS, in 2019 and 2020 women made 69.56% and 73.91% respectively. In other courts (e.g. municipal) the situation is similar<sup>5</sup>.
- Gender inequalities in education: While in 2015 more than half of women did not have education beyond primary level, meaning they lack qualifications, in the school years 2017-2021 approximately same number of boys and girls finish all levels of education<sup>6</sup>. At the same time, according to same sources, higher number of women finish tertiary education.
- Gender inequalities in the labor market: Inequalities are manifested through various dimensions, such as lower entry into the labor market, reduced employment opportunities, higher chances of unemployment, a lower share of non-agricultural employment among employed women compared to employed men, and underrepresentation in entrepreneurship and self-employment.<sup>7</sup>

Regarding transport, only 36% of women have driving licenses while the numbers are even worse when it comes to ownership of vehicles – only 22% of women own cars, opposite to 78% of men.

<sup>3</sup> 2015 World Bank Assessment of Gender Disparities in BiH

<sup>4</sup> RS National Assembly, (<https://www.narodnaskupstinars.net/?q=la/narodna-skup%C5%A1tina/sastav/narodni-poslanici>)

<sup>5</sup> Government of Bosnia and Herzegovina, Agency for Statistics of Bosnia and Herzegovina, *Women and Men in Bosnia and Herzegovina*, 2022

<sup>6</sup> Ditto

<sup>7</sup> <https://www.secons.net/files/publications/95-publication.pdf>

As for the employment of women in transport sector, we can illustrate situation with the example of PE Roads RS. There, among all employees we find 46% of women, while only 25% of management positions belongs to women.

The consultation will actively involve community members, regardless of gender, to ensure effective public participation. The project will promote access to employment and service provision opportunities. In the objective area of supporting the development of more efficient land and property markets, it is noted that properties are almost always registered to males, making it difficult for female household members to participate in benefit sharing and decision making related to displacement.

The interventions proposed in the projects will not yield their intended economic and social returns in full unless all members of the target populations and end-user beneficiaries, regardless of gender, can participate in the decision-making process and access improved facilities.

### 5.5 Stakeholder Expansion

This project aims to engage a diverse group of individuals representing various economic backgrounds with varying degrees of interest in the project. As the project evolves, it may be necessary to assess the list of stakeholders and consider broadening it to encompass other relevant parties. To facilitate this, stakeholders will be requested to complete a comprehensive questionnaire at pivotal junctures during the project's lifespan, such as following the initial call for proposals, at the midway point, or by significant project design modifications. All updates gathered will be integrated into the Monitoring & Evaluation (M&E) component of the Project.

Table 7: Expansion and update questionnaire

STAKEHOLDER EXPANSION AND UPDATE QUESTIONNAIRE	
<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>If No the Project needs to expand the Stakeholder list</i>	Is our current list focused on relevant stakeholders who are important to our current and future efforts?  <i>(Answers should be based on knowledge of the Project, feedback received and grievances registered tackling inadequate outreach, and feedback from Extension Services and TA during their Engagement)</i>
Yes No  <i>If No the Needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited</i>	Do we have a good understanding of where stakeholders are coming from, what they may want, whether they would be interested in engaging with the Project, and why?  <i>(The answers should be based on the frequency of stakeholders approaching through communication channels other than the Projects, with suggestion for inclusion of groups or eligible activities etc.)</i>
Yes No  <i>If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited</i>	Does the current engagement strategy focus adequately on potential beneficiaries of the Project from vulnerable groups?  <i>(Answers should be based on the Stakeholder engagement log relative to the gender aspects and grievances received by women focusing on insufficient inclusion and/or access to Project benefits)</i>

## 6 STAKEHOLDER ENGAGEMENT PROGRAM

### 6.1 Purpose of the Stakeholder Engagement Program

This SEP is designed to establish an effective platform for productive interaction with the affected parties and other interested parties in the implementation outcome of the project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities to:

- Ensure meaningful citizen engagement,
- Solicit feedback to inform project design, implementation, monitoring, and evaluation,
- Clarify project objectives, scope and manage expectation,
- Assess and mitigate project risks,
- Enhance project out come and benefits,
- Disseminate project information and materials,
- Address project grievances.

### 6.2 Information Disclosure

Table 8 briefly describes what kind of information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to target the wide range of stakeholder groups.

Annex B. Format table for documenting stakeholder engagement provides a template for documenting stakeholder engagement activities.

## Stakeholder Engagement Plan for RS

Table 8: Description of Information Disclosure Methods

Disclosure channel	Information/documents to be disclosed	Target stakeholders	Frequency	Responsibilities
Project web-site and/or RS web-site, RS Bulletin Board,	Project documents (including this SEP) and reports Regular updates on Project development Quarterly reports on project progress Details about the Grievance Redress Mechanism together with an electronic grievance submission form Contact details of the Putevi RS www.putevirs.com in Municipalities/Cities included in the Project Leaflet containing information on project grievance redress mechanism (GRM) Results of user-satisfaction surveys Summaries of stakeholder engagement activities (Annex B format)	All stakeholders	Project documents before Appraisal;  E&S Instruments at least 20 days before bidding.  Reports and other documents quarterly, except for the aggregate results of user-satisfaction surveys (annually) and summaries of stakeholder engagement activities (semi-annually)	PIU
Media, including traditional and social media - dedicated project Facebook, Twitter pages)	Project announcements and engagement activities Invitations to public consultations Information on planned meetings or the availability of project information Brief reports on project progress	All stakeholders	Regularly in line with project dynamics	PIU
Email	Invitations to consultation meetings Project documents	Government actors; water agencies, local communities, CSOs	As needed	PIU
Municipalities /Cities and Putevi RS bulletin boards and/or internal IT network; Putevi RS web pages, Project web Pages; Works bulleting boards (at the working sites)	Leaflet containing information on project GRM	Contractors', subcontractors', PIU and Putevi RS workers, people living in Project affected area	Start of project activities	PIU
On-site meetings, trainings and written instructions  Works bulleting boards (at the working sites)	Project GRM, OHS measures, risks during construction works, waste and hazardous materials management precautions, PPE, etc.	Workers hired during construction phase, PIU, Putevi RS workers engaged in project implementation activities, Local communities	Prior to start of construction, upgrade and modernization of infrastructure, prior to installation works, prior to safety and other investigations, and continuously as needed	PIU

### 6.3 Planned Stakeholder Engagement Activities

Project stakeholder engagement activities aim to provide specific stakeholder groups with relevant information and opportunities to express their views on topics that are important to them. The table below outlines the stakeholder engagement activities planned for the project. The types of activities and their frequency are tailored to the three main project stages: project preparation (including project design, procurement of contractors and supplies), construction, and the post-construction and operation phase.

To ensure adequate representation and participation of different stakeholders, the project will utilize various methods and techniques for stakeholder engagement direct (public consultations and meetings, surveys, etc.) as well as online and remote tools (such as TV, radio, phone, and websites) to accommodate needs of various interested and affected groups. The methods to be used during the project implementation to consult with key stakeholder groups, taking into account the needs of the final beneficiaries and, especially, vulnerable groups, are detailed in Table 9.

Table 9: Summary of proposed strategy for consultation

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation (ESMF/RPF/ESMP/SEP Disclosure, project design, procurement of contractors and supplies)	Project Affected Parties (Citizens) and Vulnerable Groups People affected by land acquisition; People residing in project area; Vulnerable households Vulnerable individuals	Land acquisition process; Assistance in gathering official documents for early land registration; Compensation rates and methodology; Project documents disclosure; Project scope and rationale; Project E&S principles; Resettlement and livelihood restoration options; Gender Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) awareness-raising; Grievance redress mechanism process.	Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Face-to-face meetings; Citizens consultation meetings; Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, leaflets, website; Information boards in the premises of the LCs, Municipalities/Cities and WUs; Grievance redress mechanism; Project Affected Parties (PAP) survey –prior to completion of resettlement; Community score cards.	Project launch meetings in Project affected municipalities and local communities; Monthly online meetings in Project affected municipalities; Survey of PAPs in Project affected municipalities and local communities; Communication through mass/social media and official municipalities web sites (as needed); Information boards with brochures/posters/leaflets in the premises of the Project affected Local Communities LCs, Municipalities/Cities (Municipalities and Transport Departments within them. ) and RS Attorney's Office and RUGIP	PIU

				- Republican Administration for Geodetic and Property Legal Relations	
	<b>Other Affected Parties (Government actors)</b> Local Government Municipalities and Cities; Municipal road maintenance and management companies in selected Municipalities and Cities Cadaster offices	Project documents disclosure; Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance redress mechanism process	Face-to-face meetings; Virtual public meetings with PAPs.	Weekly (as needed)	PIU
	<b>Other Interested Parties (Citizens)</b> Press and media at the RS level; NGOs; General public, jobseekers; Businesses and Business organizations; Workers' organizations.  <b>(Government actors)</b> RS Ministries	Land acquisition process; GBV/SEA/SH related consultation; Grievance redress mechanism process; Project documents disclosure; Project scope, Project information rationale and E&S principles;	Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Mass/social media communication- Facebook; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information boards in the premises of the LCs, Municipalities/Cities and WUs; Grievance redress mechanism; Project tours for media, local representatives; Notice board for employment recruitment.	Project launch meetings in Project affected municipalities and local communities; Monthly online meetings in Project affected municipalities; Communication through mass/social media and official municipalities web sites (as needed); Information boards with brochures/posters/leaflets in the premises of the Project	PIU

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Local Government (Municipalities and Cities) Departments;		GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, local NGOs and NGOs specifically working on GBV/SEA/SH matter.	affected Municipalities/Cities and WUs (continuous). LCs,	
	<b>Other Interested Parties (Government actors)</b> Other Government Departments from which permissions/clearances are required; Other project developers reliant on or in the vicinity of the Project and their financiers	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Grievance redress mechanism process.	Face-to-face meetings; Invitation to virtual public meetings	As needed	PIU
	<b>Other Interested Parties (Citizens)</b> Other Putevi RS Staff; Supervision Consultants; Project Design and Development Engineers; Contractors subcontractors, service providers, suppliers, and their workers/labor force	Project information - scope and rationale and E&S principles; Training on ESMF/ESMP requirements and other sub-management plans; GBV/SEA/SH awareness-raising and training on the contractors' code of conduct (which will include GBV/SEA/SH); Grievance redress mechanism process; Feedback on consultant/contractor reports..	Online trainings and workshops; Face-to-face meetings, only if needed; Invitation to virtual public meetings, virtual trainings/workshops; Submission of required reports.	As needed	PIU



Stage 2: Construction	<p><b>Project Affected Parties (Citizens) and Vulnerable Groups</b>                  People affected by land acquisition;                  People residing in project area;                  Vulnerable households</p>	<p>Land acquisition process (land registration; compensation rates and methodology; livelihood restoration)                  Grievance redress mechanism process;                  Health and safety impacts (Construction-related safety measures);                  Employment opportunities;                  Environmental concerns;                  GBV/SEA/SH awareness-raising;                  Project status.</p>	<p>Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities);                  Citizens consultation meetings;                  Individual outreach to PAPs;                  Mass/Social Media Communication - Facebook;                  Disclosure of written information - Brochures, posters, flyers, website                  Information boards in the premises of the LCs, Municipalities/Cities and WUs;                  Notice board(s) at construction sites                  Grievance redress mechanism;                  Local monthly newsletter;</p>	<p>Monthly/quarterly meetings in all affected municipalities and villages with ongoing construction;                  Communication through mass/social media (as needed);                  Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).</p>	<p>PIU</p>
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Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
			Community score cards; Citizen/PAP survey - Upon completion of resettlement and/or construction.		
	<b>Other Affected Parties (Government actors)</b> Local Government Municipalities and Cities; WUs in selected Municipalities and Cities Cadastre offices	Land acquisition process; Registration of land plots; Resettlement and livelihood restoration options; Project scope, rationale and E&S principles; Grievance redress mechanism process; Project status.	Face-to-face meetings; Virtual public meetings with PAPs.	Weekly (as needed)	PIU (Environment & Social (E&S) Consultants); PITs - Project covered Municipalities/Cities and WUs; Land acquisition department of Municipalities and Cities; Supervision and RAP consultants; Contractor/sub-contractors.
	<b>Other Interested Parties (Citizens)</b> Press and media at the RS level; NGOs; General public, jobseekers, tourists; Businesses and Business organizations; <b>Workers' organizations (Government actors)</b> RS Ministries Local Government (Municipalities and Cities) Departments;	Project information - scope and rationale and E&S principles; Coordination activities; Land acquisition process; Health and safety impacts; Employment opportunities; Environmental concerns; GBV/SEA/SH related consultation; Grievance redress mechanism process.	Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information boards in the premises of the LCs, Municipalities/Cities and WUs; Grievance mechanism; Project tours for media, local representatives; Notice board(s) at construction sites.  GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, local NGOs and NGOs specifically working on GBV/SEA/SH matter.	Monthly/quarterly meetings in all affected municipalities with ongoing construction and local communities; Communication through mass/social media (as needed); Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).	Land acquisition department of Municipalities and Cities; PUTEVI RS (Environment & Social (E&S) Consultants); PITs - Project covered Municipalities/Cities and WUs.

	<p><b>Other Interested Parties (Citizens)</b>                  Other PUTEVI RS's Staff;                  Supervision Consultants;                  Contractor, sub-contractors, service providers, suppliers and their workers</p>	<p>Project information - scope, rationale and E&amp;S Principles;                  Training on ESMF/ESMP requirements and other sub-management plans;                  GBV/SEA/SH awareness-raising and training on the contractors' code of conduct (which will include GBV/SEA/SH);                  Grievance redress mechanism</p>	<p>Face-to-face meetings;                  Trainings/workshops;                  Invitations to public/community meetings                  Submission of required reports.</p>	<p>As needed</p>	<p>PUTEVI RS (Environment &amp; Social (E&amp;S) Consultants);                  PITs - Project covered Municipalities/Cities and WUs;                  Land acquisition department of Municipalities and Cities;                  Supervision and RAP consultants;</p>
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Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
		process; Feedback on consultant/ contractor reports.			Contractor/sub-contractors;
Stage 3: Post-construction and Operation phase	<b>Project Affected Parties (Citizens) and Vulnerable Groups</b> People affected by land acquisition; People residing in project area; Vulnerable households Vulnerable individuals	Satisfaction with engagement activities and GRM; Grievance redress mechanism process; Community health and safety measures during operation phase; GBV/SEA/SH awareness-raising; Accessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)	Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Individual outreach to PAPs; Citizens consultation meetings; Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, website Information boards in the premises of the LCs, Municipalities/Cities and WUs; Grievance redress mechanism; Community score cards; PAP survey - Upon completion of resettlement	Meetings in affected municipalities and villages (six-monthly); Survey of citizens/PAPs in affected villages; Communication through mass/social media (as needed); Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).	PUTEVI RS (Environment & Social (E&S) Consultants); PITs - Project covered Municipalities/Cities and WUs; Land acquisition department of Municipalities and Cities.
	<b>Other Interested Parties (Citizens)</b> Press and media at the RS level; NGOs; General public, jobseekers, tourists; Businesses and Business organizations;  <b>Workers' organizations (Government actors)</b> RS Ministries Local Government (Municipalities and Cities) Departments;	Grievance redress mechanism process; GBV/SEA/SH related consultation; Community health and safety measures during operation phase.	Virtual public meetings, virtual trainings/workshops (separate meetings specifically for women and people with disabilities); Mass/Social Media Communication - Facebook; Disclosure of written information - Brochures, posters, flyers, public relations kits, website; Information boards in the premises of the LCs, Municipalities/Cities and WUs; Grievance redress mechanism; Project tours for media, local representatives. GBV/SEA/SH related issues would be handled and awareness on the issue including change of mind on the matter by the society at large would be addressed by implementing agencies including, local NGOs and NGOs specifically working on GBV/SEA/SH matter.	Meetings in affected municipalities (six-monthly); Communication through mass/social media (as needed); Information boards with brochures/posters/leaflets in the premises of the Project affected LCs, Municipalities/Cities and WUs (continuous).	PUTEVI RS (Environment & Social (E&S) Consultants); PITs - Project covered Municipalities/Cities and WUs; Land acquisition department of Municipalities and Cities.

## 6.4 Proposed Strategy to Incorporate the View of Vulnerable Groups

In compliance with ESS10 and the development goals of the World Bank, which emphasize shared prosperity, the Project will make every reasonable effort and utilize all available tools and methods to: (i) incorporate the needs of vulnerable groups into the Project goals, and (ii) create opportunities for vulnerable individuals and communities to benefit from the Project. To achieve this, it is essential to establish effective informational, communication, and information dissemination channels that are culturally appropriate, accessible, and understandable to all. Therefore, the project will implement special measures to ensure that disadvantaged and vulnerable groups have an equal opportunity to access information, provide feedback, or submit grievances. Project indicators will be tracked and disaggregated by gender and vulnerable groups as much as possible. The consultation activities will be inclusive, aiming to engage all segments of the local society, including vulnerable individuals.

Several strategies will be employed to effectively engage with vulnerable groups and individuals, such as partnering with nongovernmental and community-based organizations that support vulnerable and marginalized groups to develop appropriate messaging and communication strategies, partnering with specialized municipal services (e.g. for social protection and inclusion, intensified and direct communication with vulnerable groups, and other appropriate for the site-specific activities). Additionally, using minority languages/dialects or visual aids will be considered for those with low literacy, especially targeting women and Roma communities (if not using local languages, which will be established in surveys and site-specific SEP). Information will be provided in accessible formats, like Braille or large print, for those with specific communication needs. Separate small group discussions with vulnerable groups or their representatives will be regularly held for consultation, and tailored communication channels will be utilized to reach different vulnerable groups. Conducting thorough social and demographic surveys in the Project activity areas is a precondition for an effective outreach.

Where this is appropriate, focus groups and individual consultation meetings dedicated specifically to vulnerable groups will be conducted to understand their perspectives and concerns. Additional methods for enhancing participation, such as transect walks, surveys, lead interviews and resource mapping, will also be used to better include vulnerable groups in the project design and to understand the baseline conditions.

## 6.5 Disclosure and consultations of SEP

The initial version of the SEP document will be published on the official websites of the Putevi Republike Srpske, and on the official websites of the Municipalities of Foca, Zvornik and Kalinovik. Paper copy of SEP will be available at receptions of the aforementioned institutions to inform the public without access to internet. It will be accompanied by a call for comments and the call for public consultations with the defined telephone and fax numbers, and email addresses as well as postal address where comments can be sent. The public will be informed about the consultation process through available online tools, public announcements in entity newspapers, on bulleting boards of Municipalities Foca, Kalinovik and Zvornik, and Putevi RS. SEP will be available for comments and suggestions for at least 14 days before finalization. Public consultations will be organized by Putevi RS, at announced venue, and using various online channels (email, ministry website, Teams, Zoom, Facebook, etc.). Annex B. Format table for documenting stakeholder engagement template will be used for documenting these stakeholder engagement activities. SEP will address all valid comments and suggestions. Finalized SEP will also include Minutes of the Meeting, and will be redisclosed.

The SEP will be updated as necessary during project preparation, development and implementation.

## 7 GRIEVANCE REDRESS MECHANISM

Under the ESS10, the WB requires the Borrower to provide a grievance redress mechanism (GRM) to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about the environmental and social performance of implementation agency, in this case - Putevi RS. As well as SEP, the grievance mechanism will be proportionate to the risks and impacts of the Project. Project-affected parties may submit complaints regarding a Bank-financed project to the project grievance mechanism, appropriate local grievance mechanism, or the World Bank's corporate Grievance Redress Service (GRS).

The main objective of the GRM is to allow stakeholders to submit complaints, feedback, queries, suggestions, or compliments related to the overall management and implementation of the project. The GRM is intended to address issues and complaints from stakeholders in an efficient, timely, and cost-effective manner. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions.

A Project level grievance redress mechanism (GRM) will consist of a Grievance Redress Committee (GRC) administered by the Putevi RS (management and legal representatives), Project GRM Committee (PGRC) and GRM Focal Point (most likely Social Specialist in the PIU).

- CGRC will include representatives of Putevi RS and relevant competent authorities, and relevant NGO or community organization representatives (e.g. representative of the PAPs, NGO representative (female) working for Gender and GBV/SEA/SH issues, etc. depending on the subject of complaint); it will function as the second-degree complaint tier.
- PGRC presents the first tier complaint body and it will gather PIU representatives, Putevi RS technical staff and municipality representatives.
- At the first instance, all grievances will be logged by the GRM Focal Point and resolved by the municipality technical staff and the PIU (Environmental and Social Specialists, other PIU members).
- The Project Implementation Unit (PIU) will assign a staff member under the direct responsibility of the PIU Manager to be responsible for managing the GRM.

### 7.1 Grievance and feedback admission channels

The GRM shall serve as Project level information center, feedback provider, and grievance mechanism, available to those affected by implementation of all Project sub-components and be applicable to all Project activities and relevant to all local communities affected by project activities. The GRM shall be responsible for receiving and responding to grievances and comments of the following four groups:

- A person/legal entity directly affected by the project, potential beneficiaries of the Project,
- A person/legal entity directly affected by the project through land acquisition and resettlement,
- Stakeholders - people with interest in the project, and
- Residents/communities interested in and/or affected by project activities.

The GRM Focal Point will be appointed immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the PGRC and CGRC will be effective upon decision on each new sub-project has been taken. In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.).

The grievance mechanism for project workers required under ESS2 will be provided separately with details to be provided in the Labor Management Procedure.

Putevi RS holds full responsibility for establishing functioning GRM and informing stakeholders about the GRM role and function, the contact persons and the procedures to submit a complaint in the affected areas. Where possible, affected municipalities and cities will take an active role in GRM. At very least, information on the GRM will be available:

- on the Putevi RS and Project websites, <https://www.putevirs.com/>
- on the notice boards and websites of cities and municipalities,
- through social media campaigns,

- through online platforms.

**ATTENTION:** XXXXX – SOCIAL SPECIALIST AT PIU (GRM FOCAL POINT),  
 PUTEVI REPUBLIKE SRPSKE  
**ADDRESS:** TRG REPUBLIKE SRPSKE 8, BANJA LUKA  
**PHONE:** +387 051/334-500  
**FAX:** +387 051/334-545  
**E-MAIL:** INFO@PUTEVIRS.COM

The following channels will be available to stakeholders who would like to submit complaints, feedback, queries, suggestions, or compliments:

Relevant for all:

- Hotline and/or other

communication mechanisms of Putevi RS, which will be established for affected cities and municipalities;

- In-person complaints to Contractor’s representatives, construction and supervising engineer;
- Email addresses, postal addresses and phone numbers provided by the Putevi RS for citizen inquiries on their respective webpages under the “contact” section, RS and municipality notice boards, construction site billboards for citizens, stakeholders, affected parties, etc.
- Complaint boxes provided in strategic places (e.g. construction site, secluded place in Putevi RS facilities, other relevant and appropriate places that enable anonymous expressions, etc.)
- Special GRM and feedback mechanisms for vulnerable and disadvantaged groups devised under site-specific SEPs, that relate to their needs.

The updated contact information and channels for submitting complaints to the Grievance Redress Mechanism (GRM) will be included in the updated Social and Environmental Project (SEP) document, which will be made publicly available within 30 days of the project taking effect. The GRM will accept anonymous complaints and ensure they are properly addressed. Feedback on anonymous complaints will be posted online and in public spaces, such as near complaint boxes or on notice boards in relevant municipalities. Additionally, the GRM will have procedures in place for confidential reporting and the ethical handling of gender-based violence (GBV) issues. Those responsible for receiving project-related feedback will be trained to handle disclosures of GBV. Procedures will be established to promptly inform Putevi RS and the World Bank of any incidents related to sexual harassment and sexual exploitation and abuse with the consent of the survivor.

## 7.2 Processing of grievances

Any project-related feedback or grievance received via the channels listed in chapter 7.1. should be forwarded within 24 hours to the PIU GRM Focal Point, who will register the complaint/inquiry in a dedicated Logbook (Xcel or other form) and log the information. GRM Focal Point will ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. The logged information will include:

- ✓ Allocated tracking number of the case,
- ✓ Type of complaint (e.g. suggestion, question, complaint, etc.),
- ✓ Name of the Complainant (or marked anonymous),
- ✓ Contact details of Complainant,
- ✓ Way/means of submitting,
- ✓ Date when the complaint was received,
- ✓ Deadline for feedback,
- ✓ Whether the immediate acknowledgment was sent,
- ✓ Category of complaint (environmental social, land issue, restricted access, etc.),
- ✓ Language of complaint,
- ✓ Preliminary action plan.

In the process, or at the closing of the case (the latest), the following information will be added to the log:

- Name of feedback provider,
- Feedback provider's contact details,
- Nature of the feedback provided/complaint;
- Category of feedback (according to a typology to be developed in the updated SEP),
- Information about the feedback provider/complainant along categories to be developed in the updated SEP (e.g. gender, age, etc.),
- Action taken and response provided to the feedback provider/complainant,
- Date response was provided,
- Feedback provider/complainant satisfaction with response provided,
- Current status of the case,
- Any other relevant information.

### 7.3 Acknowledgment and follow-up, investigation and action

Upon receiving project-related feedback or grievances, the PIU GRM Focal Point will acknowledge receipt of the feedback/grievance within 3 days to the person who submitted it. They will outline the next steps and provide an expectation of when the feedback provider/complainant can expect to hear back from the project implementers. In the case of complaints, the PIU GRM Focal Point will then investigate the submission by reaching out to relevant actors as appropriate.

### 7.4 Grievance resolution and complainant satisfaction

Following the investigation, the PIU GRM focal point will propose a resolution to the complainant in writing within a maximum timeframe of 10 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. All grievances should be resolved within a maximum of 21 days of receipt. To enhance accountability, these timelines will be disseminated. Feedback for anonymous complaints will be provided on the Project's/RS web pages (dedicated to Project).

In case a complainant is dissatisfied with the proposed resolution, an appeal may be lodged within 15 days following the receipt of the decision with the Project Grievance Redress Committee (PGRC), who shall decide on the lodged appeal. If still dissatisfied, the Complainant can raise another appeal with the Grievance Redress Committee (GRC). An appeal to GRC again must be lodged within 15 days while response must take place within 30 days.

If the appeal is filed (as a final level GRM action) by a natural person, the competent court is Municipal Court (so called Local Court). If the dispute is between two legal entities, the District Commercial Court is competent. Srpska. If the amicable settlement of any major dispute in implementation fails for any reason, complainants may still seek a judicial settlement before the competent court.

### 7.5 Feedback and grievance monitoring and analysis

Semi-annual summaries on complaints, feedback, queries, suggestions and compliments, together with the status of implementation of associated corrective/preventative actions, will be collated by the designated PIU GRM focal point, and referred to the PIU manager. The summaries will allow to assess the volume and nature of feedback received and enhance the project's ability to address it in a timely and effective manner. These reports will also be included in the reporting to the World Bank.

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.

### 7.6 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 (GRS). The GRS 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 World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank'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 World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 8 IMPLEMENTATION ARRANGEMENTS AND RESOURCES

The Putevi RS PIU will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities are Environmental and Social Specialists engaged in the PIU, GRM Focal Point(s) and municipality representatives/appointees. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director.

The stakeholder engagement activities will be documented through SEP implementation reports, GRM logs, minutes of Stakeholder Engagement, Stakeholder Expansion forms and reports, and other necessary for implementation.

The budget estimate for the preparing and implementing SEP is [insert the total estimated amount]. The budget breakdown can be found in Annex C. See the sample budget line items listed in Annex C.

The PIU will coordinate closely and effectively with other public and competent authorities involved in the Project, such as local self-governing units (municipalities, etc.), The Table 10 (below) provides an overview of distribution of responsibilities in stakeholder engagement and information dissemination.

*Table 10: Overview of the project's stakeholder engagement implementation arrangements*

STAKEHOLDER	RESPONSIBILITIES
Putevi RS PIU	<p>Prepare the Project SEP and regularly update it in accordance with new findings and relevant developments;</p> <p>Prepare site-specific SEPs;</p> <p>Carry out baseline surveys and other social analysis needed for identification of stakeholders and effective communication;</p> <p>Plan, implement and monitor SEP activities;</p> <p>Disclose all documents, distribute outreach material;</p> <p>Lead and coordinate stakeholder engagement activities;</p> <p>Lead stakeholder engagement activities at the municipal and community level during land acquisition and construction works;</p> <p>Lead stakeholder engagement activities related to loss of livelihood, restricted access to land, goods and services (and other adverse impacts when needed) at the municipal and community level;</p> <p>Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings;</p> <p>Manage the grievance redress mechanism (GRM) at Project level, communicate grievances regularly through monitoring reports;</p> <p>Build capacity of implementing partners – Local Governments and GRM on Environmental and Social Framework (ESF) stakeholder engagement standard and its implications;</p> <p>Manage the project GRM database and submit quarterly reports (to WB) on the substance and quantity of grievances; and</p> <p>Supervise/monitor Sub-Projects and engage with stakeholders.</p>
Local Governments (Municipalities/Cities)	<p>Participate in stakeholder engagement activities at the municipal and community level during land acquisition, loss of livelihood, restricted access to land, services and goods, and construction works;</p> <p>Participate in stakeholder engagement activities related to road closures and organization of bypasses;</p> <p>Local focal points for GRM;</p> <p>Administer the Grievance in accordance with instruction of Putevi RS;</p> <p>Disclose all documents, distribute outreach material as needed;</p> <p>Facilitate information requests and grievances by transfer to the Putevi RS.</p>
Line departments in Municipalities and Cities in RS	<p>Update spatial plans and issue permits (as required);</p> <p>Respond to E&amp;S risk management requests;</p> <p>Facilitate information requests and grievances by transfer to the Putevi RS;</p> <p>Disclose all documents, distribute outreach material as needed;</p> <p>Administer land acquisition process.</p>

<p>Ministry of Spatial Planning, Construction and Ecology</p>	<p>Set environmental, disclosure, community engagement, and other conditions for infrastructure investments and civil works;                  Issue and publish construction permits;                  Approve EIAs and issue Environmental Permits, issue calls for comments regarding EIAs and permits;                  Provide expert support in resolving complaints.</p>
<p>Ministry of Transport and Communication</p>	<p>gives certain consents if necessary</p>
<p>Ministry of Interior</p>	<p>Organize, publish and actively inform the public on temporary traffic regulation;                  In the case of blasting (the stone formations), disseminate information to the public and engage with communities to ensure safety.</p>
<p>Ministry of Trade and Tourism</p>	<p>Participate in identification of stakeholders related to tourism;                  Facilitate communication with businesses that are affected by the Project whether through restricted access to land, water, goods and services or experience loss of livelihood.</p>
<p>Other stakeholders</p>	<p>Participate in the implementation of SEP activities                  Monitor/ensure project's compliance with the laws of RS                  Engage with the project's stakeholders on E&amp;S issues</p>

## 9 SEP MONITORING AND REPORTING

As with other Project documents (ESMF, E&S Instruments, ESCP, etc.) the PIU will, for Putevi RS, monitor implementation and progress, as well as report on results of the project, including monitoring of the Stakeholder Engagement Plan implementation. The PIU will be responsible for overall compilation of monitoring results, progress and implementation results which will be presented and communicated in site-specific SEP Implementation Reports. Feedback and grievances received through the project GRM will be aggregated and included to the aforementioned site-specific SEP Reports. Frequency of reporting will follow frequency of other site-specific E&S Instruments (ESIA, ESMP, etc.) unless differently agreed with the WB.

The sub-project activities will be organized in the way to provide opportunities to stakeholders, especially Project Affected Parties (PAPs) to participate in monitoring of certain aspects of Project performance and provide feedback. Putevi RS will try to facilitate cooperation with the Project affected municipalities and local NGOs to enable and encourage PAPs to submit grievances and other types of feedback on the local level (as this is likely to be more convenient and familiar to the local population). Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance.

The Social Specialist in the PIU (or other GRM/Feedback Focal Point, if appointed) will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipalities and/or Villages or other means appropriate. Minutes of meetings will be shared during subsequent public meetings, or notice boards, or other appropriate methods defined in the site-specific SEPs. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMS and phone calls will be used to respond to stakeholders whose telephone numbers are available.

SEP reporting will include the following, as a minimum:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments and other relevant requirements and objectives under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators for SEP and included in the SEP. An illustrative set of indicators for SEP monitoring and reporting is included in Annex E while SEP monitoring indicators for construction works are indicated in the Table 11.

### 9.1 Reporting back to stakeholders groups

The SEP will be revised and updated as necessary during project implementation.

Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders include the following: municipal boards notices, publishing reports on web site, direct communication and report dissemination, public consultations, etc. This reporting back to the stakeholders will be quarterly unless differently agreed between PIU, the community in question, subject to WB approval.

### 9.2 Monitoring Reports during Construction

Monitoring and implementation reports documenting the environmental and social performance of the Project during

construction will be prepared by the Social and Environmental Specialists to be engaged in the Project Implementation Unit (PIU) in the Putevi RS. Monitoring and implementation reports will be submitted to Putevi RS and the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. Table 11 proposes a comprehensive set of indicators related to SEP performance at this stage.

Table 11: SEP Indicators to be documented in Progress Reports

<b>ENGAGEMENT WITH Project Affected Parties (PAPs)</b>
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number and location of awareness raising activities related to GBV/SEA/SH delivered
Description, in general terms, of successful activities in which stakeholders have been engaged
For each meeting, number and nature of comments received, actions agreed during these meetings, and status of those actions
Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the report. They will summarize the view of attendees and distinguish between comments raised by men and women
<b>ENGAGEMENT WITH OTHER STAKEHOLDERS</b>
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Description of associations, NGOs, etc., covered by stakeholder engagement activities
Issues raised by NGOs and other stakeholders, actions agreed with them and status of those actions
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
<b>GRIEVANCE REDRESS MECHANISM</b>
Number of grievances received, in total and at the local level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of LGRC meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
Summary of issues raised by affected people and external stakeholders, disaggregated by complainant's gender and means of receipt (telephone, email, discussion), and how these issues were solved
Number of registered survivors of sexual exploitation and abuse and issues raised by the survivors
Percentage and type of reported project-related GBV/SEA/SH allegations resulted in disciplinary action
<b>WORKERS GRIEVANCES</b>
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

The reporting on Environmental and Social activities, monitoring of RAP, E&S Instruments, CHMP and SEP implementation, carried out by the Putevi RS, Contractors, and others (in the case of Associated Facilities) will be the responsibility of the Social and Environmental Specialists of the PIU during the construction phase, and will be undertaken in accordance with the requirements of the ESMF and ESCP (and other E&S Instruments).

## 10 ESTIMATED BUDGET

The Putevi RS will be responsible for planning and implementation of stakeholder engagement activities, as well as other relevant outreach, disclosure and consultation activities. Based on the needs of the SEP, the stakeholder engagement/communication budget will cover the following activities: (i) development of communication strategy, (ii) printed outreach materials and project documents (leaflets, ads, manuals, brochures, posters, etc.), (iii) media coverage expenditures, (iv) PAP surveys, (v) GBV/SEA/SH training for GMR Operators.

To ensure successful SEP implementation, the Project will hire an external Social Specialist in the PIU and part-time Communication Specialist when needed to support Pitevi RS in outreach and social performance, under the Sub-Component 2.3: Project management and capacity building.

## 11 ANNEXES

### 11.1 Annex A. Project Grievance Form

SUSTAINABLE, INTEGRATED AND SAFE ROAD PROJECT

Project Grievance Form

Designation (entered by the Project Implementation Unit)	
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	By mail: <i>Provide an address for mail delivery:</i>
Signify the desired manner of contact (by mail, by telephone, by email).	_____
	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?	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please send this Form to the following address:

**Attention**, Attention: Branka Đukić – Social Specialist at PIU in Putevi RS, Putevi RS  
 Address: Trg Republike Srpske 8, Banja Luka  
 Phone: +387 051/334-500  
 Fax: +387 051/334-545  
 E-mail: [info@putevirs.com](mailto:info@putevirs.com)

### 11.2 Annex B. Format 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:
Photos (with eh consent of present)



11.3 Annex C: Template to Capture Consultation Minutes

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

#### 11.4 Annex D: Example of a SEP Budget Table

This budget table is intended for planning and reserving financial means to support site-specific SEPs implementation. As the key inputs such as number of sub-projects, municipalities that will be involved, consultants, media, PAPs, targeted groups and other is not currently available, the Project SEP provides this template to guide sub-project SEP budgeting during Project implementation.

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
<b>1. Estimated Staff salaries* and related expenses</b>					
1a. <i>E.g., Communications consultant</i>					
1b. <i>E.g., Travel costs for staff</i>					
1c. <i>E.g., Estimated salaries for Community Liaison Officers</i>					
<b>2. Consultations/ Participatory Planning, Decision-Making Meetings</b>					
2a. <i>E.g., Project launch meetings</i>					
2b. <i>E.g., Organization of focus groups</i>					
<b>3. Communication campaigns</b>					
3a. <i>E.g., Posters, flyers</i>					
3b. <i>E.g., Social media campaign</i>					
<b>4. Trainings</b>					
4a. <i>E.g., Training on social/environmental issues for PIU and contractor staff</i>					
4b. <i>E.g., Training on Gender-Based Violence (GBV) for PIU and contractor staff</i>					
<b>5. Beneficiary surveys</b>					
5a. <i>E.g., Mid-project perception survey</i>					
5b. <i>E.g., End-of-project perception survey</i>					
<b>6. Grievance Mechanism</b>					
6a. <i>E.g., Training of GM committees</i>					
6b. <i>E.g., Suggestion boxes in villages</i>					
6c. <i>E.g., GM communication materials</i>					
6d. <i>E.g., Grievance investigations/site visits</i>					
6e. <i>E.g., GM Information System (setting up or maintenance)</i>					
6f. <i>Other GM Logistical Costs</i>					
<b>7. Other expenses</b>					
7a. ...					
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>					

\*Note: Salary costs can be indicative

## 11.5 Annex E: Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<b>GM.</b> To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	Are project affected parties raising issues and grievances? How quickly/effectively are the grievances resolved?	Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion boxes placed in the villages/project communities. Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	Records from the implementing agency and other relevant agencies
<b>Stakeholder engagement impact on project design and implementation.</b> How have engagement activities made a difference in project design and implementation?	Was there interest and support for the project? Were there any adjustments made during project design and implementation based on the feedback received? Was priority information disclosed to relevant parties throughout the project cycle?	Active participation of stakeholders in activities Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	Stakeholder Consultation Attendance Sheets/Minutes  Evaluation forms  Structured surveys  Social media/traditional media entries on the project results
<b>Implementation effectiveness.</b> Were stakeholder engagement activities effective in implementation?	Were the activities implemented as planned? Why or why not? Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?	Percentage of SEP activities implemented. Key barriers to participation identified with stakeholder representatives. Number of adjustments made in the stakeholder engagement approach to	Communication Strategy (Consultation Schedule)  Periodic Focus Group Discussions  Face-to-face meetings and/or Focus Group discussions with

		improve projects' outreach, inclusion and effectiveness.	Vulnerable Groups or their representatives
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## 11.6 Annex F: Project Components

### Component 1: Improved Regional Connectivity

The overall objective of this component is to improve regional connectivity and the quality and sustainability of the magistral road network in BiH. A high quality, safe network is essential to provide reliable access to jobs, markets, and services in BiH and connectivity to neighboring countries. To this end, the component will finance upgrade and improvement of Route 2b of the TEN-T network connecting Sarajevo (BiH) and Podgorica (Montenegro), and for the reconstruction, rehabilitation and maintenance of priority magistral roads. The upgrade of Route 2b will further regional integration with Montenegro, improve access to markets, foster the growing tourism industry in the area, and support BiH in its EU accession process. Financing of priority magistral roads will further domestic connectivity and the resilience and safety of the network. Priority investments will be determined by the merits of safety, resilience and economic return.

#### Subcomponent 1.1: Upgrade of Route 2b between Brod na Drini (Foca) and Hum (Scepan Polje)

This subcomponent will improve the connectivity between Sarajevo and Podgorica through the upgrade of 13.245 km between Brod na Drini (Foca) and Hum (Scepan Polje) on route 2b. The entire investment will be in RS and jointly financed through an EBRD loan and WBIF grant. The current road is in very poor condition as described in Annex 2. The road is only 3.5m wide, and it is characterized by many active landslides and ongoing deformations of the road surface, wooden bridges, and curvy alignment. The interstate bridge (Montenegro Border) over the river Tara was damaged during the war, and later repaired with the intention of providing a temporary solution for crossing over the Tara Canyon. The road has been closed for trucks and commercial vehicles since 2019. The bridge will be financed through BiH own resources before the start of works on the project road. The original feasibility study for the road was completed in 2015 and detailed designs were done in 2017, there is a need to perform additional geotechnical investigations and update and adjust detailed design, if and where needed. The road is vulnerable to flooding and landslides and will require additional design work to enhance climate resilience. The results from a GFDRR activity on Nature Based Solutions and Network Vulnerability Assessments will inform this process. A road safety audit will be undertaken to inform the final detailed design. Supervision will be also financed under the subcomponent.

The works will be tendered through a design and build approach, following the alignment recommended in the feasibility study for which detailed design was developed in 2017. The alignment follows the right bank of Drina River until the confluence of the rivers Tara and Piva, where the border crossing is located. The alignment runs close to the existing road, is 13,245.5 km in length, includes 14 structures (1,383 m) and work on local connecting roads (2.8 km). The design and build approach will transfer part of the risk to the contractor, which might result in slightly higher costs but would allow for more flexibility and faster implementation once the designs are approved. An expert will be mobilized to support the client in preparing the design and build tender documents as per the Bank guidelines. This subcomponent will finance the design build contract including all necessary bridges, interchanges, road safety audits and site supervision.

#### Subcomponent 1.2: Investments in a program of rehabilitation of priority national roads

This sub-component will finance selected sections of the program for the reconstruction, rehabilitation and maintenance of priority magistral roads. The needs assessments for addressing backlog rehabilitation and maintenance needs stands at about EUR 740 million, representing an unconstrained scenario. Based on the outputs from the asset management systems in both entities a priority list of rolling investments will be identified from that backlog for Bank finance. In total this sub-component will improve about 150 km of road and associated blackspot improvements and interventions to enhance climate resilience. The works will be undertaken along the existing alignment and will include resurfacing, partial pavement widening, works concerning traffic signalization improvements, structure renewal, road safety improvements, road protection works, and rehabilitation of bridges and tunnels as well ancillary connections i.e. crossroads, access roads, drainage systems, etc. The proposed rehabilitation will improve ride quality leading to lower operating costs for road users and lower life-cycle cost for the road asset.

Some specific blackspot improvements have been identified to be supported by SSTP grant finance including sections of the M17 Jablanica-Potoci road in FBiH which has an extremely poor iRap assessment score, and two bridges in RS which are in a dangerous condition. Designs were prepared, and in 2018, PC FBiH Roads commissioned the placement and replacement of the existing elastic rail guards, including the construction and reconstruction of load-bearing elements (reinforced concrete abutment, shoulders, etc.). In Republika Srpska, two bridges-Bridge on the Drinjača River and Bridge Tatinac were identified as highly unstable and deteriorated and will be repaired to enhance the safety and resilience of the road network. Bridge construction/rehabilitation will undertake structural retrofits/reconstruction to withstand climate hazards. Bridge number 350 on the River Drinjača, is located on the main road M-19.2, on the section Tišća - Vlasenica in the Municipality of Vlasenica. In BiH, the main road M-19.2 connects Kladanj and Vlasenica. The road is 30 km long and connects to the M18 highway in Kladanj, while in Vlasenica, it connects to the M19 highway and is very important from the transport and socio-economic

importance for the network. The bridge Tatinac is located on the section of the Regional Road RII-5501 (old code R-443), section Grajseljčić - Klanci, Municipality of Kalinovik.

The component will also support Technical Assistance activities relevant for the road upgrades with road safety and resilience consideration in mind. Support in the enhancement of institutional structure around road safety at state and entity levels will be also provided: (i) Update to the National Guidelines for design, construction, supervision, and maintenance and related rulebooks will be supported to reflect changes in the relevant standards and laws since 2004 and to allow adoption of modern practices in the transport construction sector; (ii) Support to establishment of a road crash database system as per CAdAS protocols on the level of BiH and in close cooperation with the Ministry of Interior and Health will be provided; and (iii) road safety audits, technical control, designs, and site supervision of the sections to be financed under the subcomponent. In addition, all activities financed through this component will be complemented by a GFDRR grant to support integration of Nature Based Solutions into road designs and for the development of a methodology to assess road network vulnerability. The methodology for vulnerability assessment will be used to screen the country's road network for climate resilience considerations.

## **Component 2: Enhanced Road Sector Governance**

This component will support the BiH EU accession and reform process in the transport sector through interventions that enhance road companies' ability to manage and operate their road infrastructure efficiently and cost effectively. The design of this component reflects screening and recommendations from the EU acquis report for BiH and further institutionalization of the reforms supported through previous bank engagements. The selected activities will strengthen road management in BiH with a particular focus on improving the financial sustainability of the road companies, streamlining climate resilience, and enhancing road safety. The activities under this component will not add GHG but will increase adaptation and resilience in the future.

### **Subcomponent 2.1: Improved safety and resilience of the BiH road network**

This subcomponent will support implementation of elements of the road safety ecosystem including screening and prioritization of blackspot locations and design and implementation of interventions. All activities are aligned with BiH accession agenda as identified in the EU acquis report for BiH. The subcomponent will be implemented through technical assistance, goods and services, training and operating costs and will support the following activities:

- Road Safety Inspection and Blackspot improvement program: RSI will be performed on priority 1200 km road network across BiH. Recommendations from the RSI will be included in the road safety action plans of the road companies and support in the development of a program for Blackspot improvement, particularly in the RS where there has been no prior screening. Measures will be proposed to rehabilitate the road sections near these high-risk locations.
- Stability monitoring: A Slope Management system including landslides and facilities monitoring will be developed. This will include monitoring equipment, patrols, support with planned road closures, signing, periodic maintenance, and minor rebuilding to reduce vulnerability.

### **Subcomponent 2.2: Enhanced operational management**

The subcomponent will finance technical assistance, and procurement of goods and services to enhance the operational management of the roads sector in BiH. It will finance activities that support the institutionalization of modern road asset management system, a system of Weigh-in-Motion to protect existing assets from overloaded trucks, and the implementation of Intelligent Transport Systems (ITS) for tunnel management. The activities will support the development of multi-year maintenance plans based on priorities developed through RAMS designed to reduce the whole life costs of the road network and the overall financial sustainability of the sector. The activities include:

Enhancing the company level Road Asset Management Systems. The project will finance enhancements to the existing RAMs to integrate a module for the systematic economic prioritization of interventions. It will finance equipment for road condition monitoring, weather stations and screening of the network for optimal decision making and identification of network vulnerability. Further institutionalization of RAMs will be supported to help optimize multiannual planning and the preparation of investment and maintenance plans.

Implementation of a BiH wide Weigh-in-Motion system: Introduction of a weight control system will support the country in addressing overloaded trucks causing premature failure of roads. The project will finance the equipment necessary for a mixture of mobile weight control systems and fixed weigh-in-motion (WIM) systems. TA will support drafting the necessary legislation to facilitate the operations and enforcement of such a system.

Implementation of ITS in selected tunnels: The subcomponent will support higher utilization of ITS by centralized monitoring and control of ITS systems in tunnels.

**Subcomponent 2.3: Project Management and Capacity building**

This subcomponent will finance eligible expenses for both companies to enable successful implementation of the Project. The project will be implemented by the road company employees but they can benefit from capacity building and selected additional expert support as may be necessary in procurement, financial management, environmental and social safeguards and annual program planning. The subcomponent will support relevant training and knowledge exchange activities and operating costs like office equipment, travel, printing and translation costs. In addition, the subcomponent will support 30 paid internships, out of which sixty percent will be women. Paid internships will be granted to students from the final year of relevant faculties or recently graduated students, enabling the companies to identify candidates that could be good addition to their institutions, with the aim to guarantee permanent employment for at least 5 women. The subcomponent will provide support in establishment of the online platform for dissemination of information about the project and user feedback interface. This will be implemented either through separate project webpage or within existing web page of the companies.

## 12 Minutes of Meeting for the Set of framework Environmental and social documents

Public consultation process for the Set of framework environmental and social documents for **Sustainable, Integrated and Safe Road Infrastructure Project** started on October 7, 2024. The draft version of the ESF was disclosed on Public Company "RS Roads" Ltd. and Foca Municipality web site.

Notification for public consultation process and public consultations meeting was published in English and local language:

<https://shorturl.at/VpDi1>

<https://shorturl.at/6r10X>

Below you can see the published news on the mentioned websites:

**ЈАВНО ПРЕДУЗЕЋЕ  
“ПУТЕВИ РЕПУБЛИКЕ СРПСКЕ”  
БАЊА ЛУКА**

Почетна О нама Регулатива Путна мрежа Дјелатност Јавне набавке Везе тражи...

**АКТУЕЛНОСТИ**

МАПА САЈТА  
ВОДИЧ О ПОСТУПКУ  
ПРИСТУПА ИНФОРМАЦИЈАМА  
ЗАХТЈЕВ ЗА ИЗД. ДОЗВОЛЕ ЗА  
ВРШЕЊЕ ВАНРЕД. ПРЕВОЗА  
СЕТ ОКВИРНИХ ДОКУМЕНАТА

**СТАЊЕ ПУТНЕ МРЕЖЕ**

СТАЊЕ НА ПУТЕВИМА

**СЛУЖБА ЗАШТИТЕ**

ЗАХТЈЕВИ ЗА САГЛАСНОСТ

**ПРОЈЕКАТ ОДРЖИВЕ, ИНТЕГРИСАНЕ И БЕЗБЈЕДНЕ ПУТНЕ  
ИНФРАСТРУКТУРЕ – Set okvirnih ekoloških i socijalnih  
dokumenata** Print

**Датум: 07.10.2024**

У склопу припреме Пројекта одрживе, интегрисане и безбједне путне инфраструктуре (П502979) који ће се финансирати из средстава Свјетске Банке, Путеви Републике Српске као јединица одговорна за имплементацију пројекта обавезује се да ће пројекат водити у складу са Еколошким и социјалним смјерницама Свјетске Банке (Environmental and Social Framework of the World Bank, 2018).

У складу са овим смјерницама израђен је сет докумената који се тиче препознатих утицаја овог пројекта на животну средину и друштво, те ће се даље активности спроводити у складу са истим.

Документи се овим путем стављају на јавни увид, те је на исте могуће доставити коментаре или питања на адресу [info@putevirs.com](mailto:info@putevirs.com).

У току имплементације се очекује израда докумената Пројекта о процјени утицаја на животну средину и друштво који ће се предложити и конкретне мјере ублажавања утицаја. Исти ће такође бити предметом јавног увида и расправе, те ће се стални процес консултација са свим заинтересованим странама одржавати за вријеме трајања пројекта.

Јавна расправа ће се одржати у просторијама Општине фоча, у уторак 29.10.2024. године са почетком у 10h.

**НАПОМЕНА:** Обзиром да је сет оквирних докумената званично завршен и објављен на овој страници прије него су се установиле размијере природних непогода и поплава које су недавно погодиле БиХ, ЈП "Путеви РС" је донијело одлуку да се у пакет ових докумената накнадо уврсти CERC компонента (Contingency Emergency Response Component). Ова компонента представља Контингентну хитну реакцију која омогућује механизам финансирања дизајниран да обезбиједи брз приступ средствима у случају кризе или ванредног стања. На овај начин се осигурава да зајмопримци могу брзо приступити потребним средствима за ублажавање негативних економских и друштвених утицаја ванредних ситуација, чиме се јача отпорност и капацитет земље за брзу реакцију.





Насловна || Вијести || Фоча + || Управа + || Скупштина Општине + || ОИК Фоча + || Контакт

Одјељење за просторно уређење и стамбено комуналне послове Општинске управе Општине Фоча заказује

**ЈАВНУ РАСПРАВУ**  
о Пројекту одрживе, интегрисане и безбједне путне инфраструктуре

У склопу припреме Пројекта одрживе, интегрисане и безбједне путне инфраструктуре (П502979) који ће се финансирати из средстава Свјетске Банке, Јавно предузеће „Путеви Републике Српске“ као јединица одговорна за имплементацију пројекта обавезује се да ће пројекат водити у складу са Еколошким и социјалним смјерницама Свјетске Банке (Environmental and Social Framework of the World Bank, 2018).

Пројекат одрживе, интегрисане и безбједне инфраструктуре обухвата више компоненти од којих се прва односи на реконструкцију магистралног пута првог реда М – I III на дионици Брод На Дрини (Фоча) – Хум (Шћепан Поље).

У складу са овим смјерницама израђен је сет докумената који се тиче препознатих утицаја овог пројекта на животну средину и друштво, те ће се даље активности спроводити у складу са истим.

Документи се путем званичне интернет адресе Јавног предузећа „Путеви Републике Српске“ ([www.putevirs.com](http://www.putevirs.com)) стављају на јавни увид, те је на исте могуће доставити коментаре или питања на адресу [info@putevirs.com](mailto:info@putevirs.com).

У току имплементације се очекује израда докумената Пројекције утицаја на животну средину и друштво који ће се предложити и конкретне мјере ублажавања утицаја. Исти ће такође бити предметом јавног увида и расправе, те ће се стални процес консултација са свим заинтересованим странама одржавати за вријеме трајања пројекта.

Јавна расправа ће се одржати у просторијама Општине Фоча, у такозваној „Сали ДПО“ у уторак 29.10.2024. године са почетком у 10h.

Позива се заинтересована јавност да узме учешће у Јавној расправи коју ће водити овлашћени представници ЈП „ПутевиРС“.

In addition, via e-mail, representatives of Roads RS and Foca Municipality informed the Ministry of Spatial Planning, Construction and Ecology, as well as other interested parties and non-governmental organizations, about the consultation process and public inspection.

**Public consultation meeting was held on October 29, 2024.**

**The meeting started at 10 a.m.**

Public consultation meeting was organised jointly for the set of framework environmental and social documents for Sustainable, Integrated and Safe Road Infrastructure Project. This set of framework documents consists of:

ESMF – Environmental and Social Management Framework

SEP – Stakeholder Engagement Plan

ESCP – Environmental and Social Commitment Plan

LMP – Labor Management Procedures

RPF – Resettlement Policy Framework

At the public consultation meeting following representatives from Roads RS were present: Mrs. Tamara Mladenović Piljagić and Mrs. Branka Đukić.

In front of Foca Municipality, Mr. Ranko Popović was present.

List of attendees that joined public consultation meeting:

PROJEKAT ODRŽIVE, INTEGRISANE I BEZBJEDNE PUTNE INFRASTRUKTURE  
SET OKVIRNIH EKOLOŠKIH I SOCIJALNIH DOKUMENATA

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LIST OF PARTICIPANTS /  
LISTA UČESNIKA / CA

29. oktobar 2024. godine, Opština Foča

JAVNA RASPRAVA

Br. No	Ime i prezime Name and surname	Institucija Institution	Funkcija Function	Kontakt (telefon i email) Contact (phone no. and email)	Potpis Signature
1.	Česka Matijević	Opština Foča	Član Javnosti	065-0	[Redacted]
2.	Popović Nebojša	Opština Foča	Član Javnosti	066/8	[Redacted]
3.	BRANKO Popović	OPŠTINA FOČA	NAČELNIK ODJELZENIK	066/8 464	Popović
4.	RIEVAĐ ČELIK		GRADANIN	066/8 571	[Redacted]
5.	Perišić Zorica		GRADANIN		[Redacted]
6.	Sušica Bulatović	Opština Foča		067/1	[Redacted]
7.	Branka Čaućević	Opština Foča		065/1	[Redacted]
8.	Munijadžić		PROJEKTOVAČ	065/4	[Redacted]

At the beginning of the meeting, Mrs. Tamara greeted everyone present and presented basic information about the project and a set of framework documents. All components of the Project (including CERC component) were explained. Mrs. Branka presented the documentation, emphasizing the purpose, approach and importance of creating documents.

The identified environmental and social risks, potential impacts of the project, as well as instruments and measures for their mitigation and/or elimination are presented.

**The cover page of the presentation:**

After presentation, Mr. Ranko Popović took the floor stating the significance of the Project for the entire region, primarily emphasizing the Component 1.1 Upgrade of Route 2b between Brod na Drini (Foca) and Hum (Scepan Polje).

Mr. Dzevad Celik had a comment regarding expropriation for this Component, stating that he had received an offer for expropriation and that he had filed an appeal against it. The comment was received with the reply that all procedures will be carried out in accordance with the legislation in RS as well as with WB standards, and that this case will be taken into consideration.

Afterwards, to all participants of the public hearing - via email was sent additional clarification regarding expropriation. The clarification stated: during the implementation of the Sustainable, Integrated and Safe Road Infrastructure Project, specific RAP (Resettlement Action Plan) documents will be created for each sub-project (as well as for the Route 2b Improvement Project between Brod na Drina and Šćepan Polje). During the preparation of the RAP document, all identified persons affected by the expropriation will be consulted. The RAP documents prepared in this way must be verified by the World Bank and then publicly consulted. The start of the works will not begin until all compensations have been paid in accordance with the RAP document.

During the consultation period no comments were received on Set of Framework Environmental and Social Documents, nor electronically nor via hard copy.

**Photos:**

