

**STAKEHOLDER ENGAGEMENT PLAN  
(SEP)**

for

**Just Transition in Select Coal Regions of  
Bosnia and Herzegovina**

DRAFT

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**LIST OF ABBREVIATIONS**

BiH	Bosnia and Herzegovina
CGC	Central Grievance Committee
CSO	Civil Society Organization
CGRC	Central Grievance Redress Committee
EIA	Environmental Impact Assessment
EPBiH	JP Elektroprivreda Bosne i Hercegovine d.d. Sarajevo [Power Utility]
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FBiH	Federation of Bosnia and Herzegovina
FMERI	Federal Ministry of Energy, Mining and Industry
GM	Grievance Mechanism
GRS	Grievance Redress Service
GC	Grievance Committee
LMP	Labor Management Procedures
LGRC	Local Grievance Redress Committees
M&E	Monitoring & Evaluation
MOFTER	BiH Ministry of Foreign Trade and Economic Relations
OIP	Other Interested Parties
PAP	Project Affected Parties
PIE	Project Implementing Entity
PIU	Project Implementation Unit
PCB	Project Coordination Body
LULRP	Land Use and Livelihood Restoration Plan
LULRF	Land Use and Livelihood Restoration Framework
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment
SEL	Stakeholder Engagement Log
SEP	Stakeholder Engagement Plan
VG	Vulnerable Groups
WB	World Bank



## 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 AND SOCIAL STANDARDS</b>	The 10 Environmental and Social Standards (ESS) set out the requirements that apply to all new WB investment project financing enabling the WB and the Borrower to manage environmental and social risks of projects.
<b>PAP</b>	„Project affected party“ is any person/party who is affected or likely to be affected by the project because of actual impacts 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..
<b>OIP</b>	Other interested parties - 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.
<b>STAKEHOLDERS</b>	Refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).
<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>	The 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 living below the poverty line, the landless, the elderly, women and children, or other displaced persons who cannot be protected by domestic legislation in terms of land compensation, 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.

## 1 INTRODUCTION

### 1.1 Project Description and Context

The World Bank (WB) is considering to support Bosnia and Herzegovina (BiH) through the support the State level of BiH and the Federation of BiH to a Just Transition in the selected coal regions in BiH for improved social and environmental outcomes. Geographically the Project will be implemented throughout F BiH, supporting measures of State level institutions and F BiH.

The Project development objective (PDO) is to support the Just Transition **in the Selected Coal Regions project** in BiH. Per World Bank definition<sup>1</sup>, a Just Transition addresses the needs of workers and surrounding communities affected directly or indirectly by the shift away from coal; provides clear energy access to millions of people; repurposes mining lands and other assets for new economic use; and creates a shared vision (nationally and regionally) for the country's energy transition pathway.

The Project is designed to achieve its objectives through the **following four components with subcomponents**, as follows:

#### 1. Component 1: Institutional Strengthening and Project Management

##### *Subcomponent 1.1: State-level Measures on Just Transition*

- *Committee on Just Transition*
- *Annual Just Transition Forum*

##### *Subcomponent 1.2: F BiH-level Measures on Just Transition*

- *Institutional Strengthening for a Just Transition in F BiH*
- *Policy Development, Legal and Regulatory Updates*

#### 2. Component 2: Repurposing of Post-Mining Lands (Banovici and Kreka) and Closure of Select Underground Works (Zenica)

##### *Subcomponent 2.1: Assessing, Planning and Executing Repurposing*

##### *Subcomponent 2.2: Planning and Executing Closure of Select Underground Work(s)*

#### 3. Component 3: Renewable Power Generation in RMU Banovici and Kreka Mine

#### 4. Component 4: Support to Labor Transition in Banovici and Zenica Mines

##### *Subcomponent 4.1: Financial Obligations*

##### *Subcomponent 4.2. Support the Transition of Mine Workers*

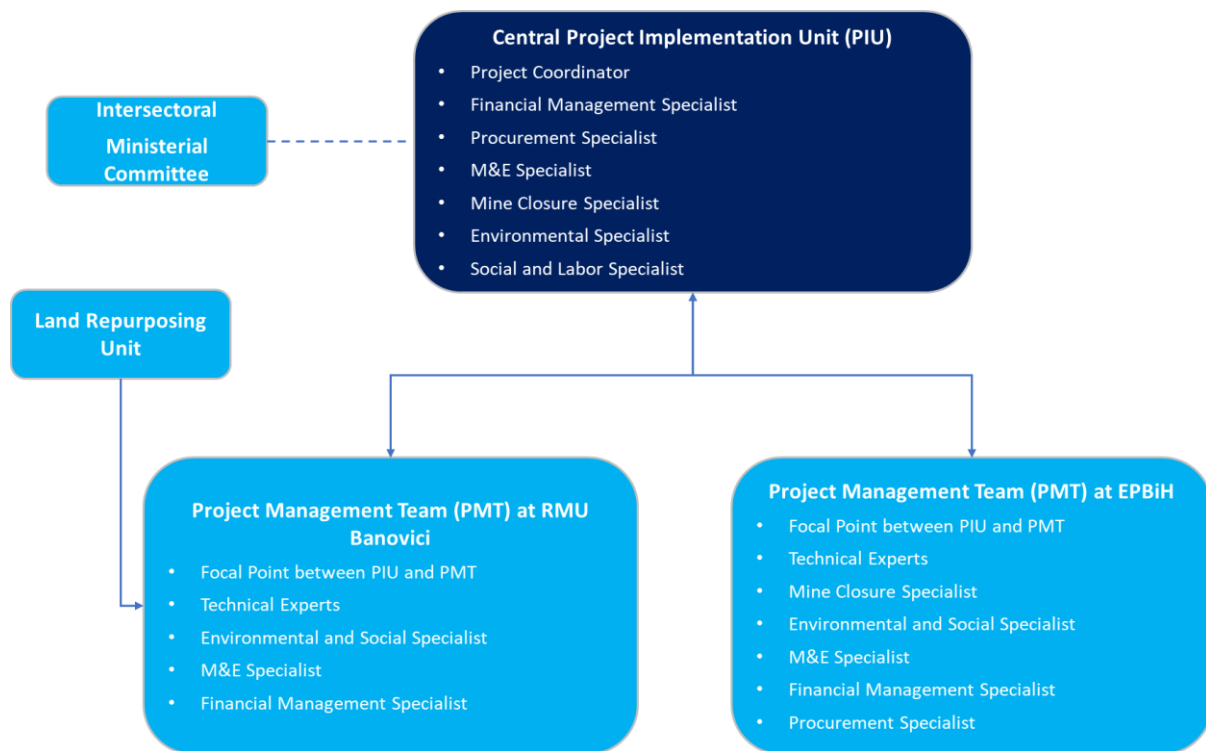
##### *Subcomponent 4.3: Community-delivered productive measures for affected unemployed workers and community engagement*

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<sup>1</sup> See *Just Transition Away from Coal Official Talking Points*. November 2023. World Bank.

Each component of the Project operation reflects an agreed design with the beneficiaries (**Banovici, Zenica, Kreka, and EPBiH**) and builds on prior work and findings from the Just Transitions ASA.

**The Project will be managed by FMERI through a Project Implementation Unit (PIU), supplemented by Project Management Teams (PMTs) in RMU Banovici and EPBiH.** The PIU in FMERI will be established no later than one month following the Effective Date of the project and will include several key members. The PIU will be responsible for channeling resources to the PMTs to strengthen them as required. The PMTs will provide technical support to the PIU for the activities relevant to their respective companies. Also, Intersectoral Ministerial Committee – Federation of BiH Steering Committee (SC) will be established, to support Energy Sector Just Transition Project in FBiH, appointed by the Decision made by the Government of the Federation of Bosnia and Herzegovina and which responsibilities are defined in the Section 7.1.



**Figure 1 Proposed project implementation arrangements**



## 1.2 Purpose of the Stakeholder Engagement Plan

Pursuant to the WB requirements, stakeholder engagement is an inclusive process implemented throughout project life-cycle, and it is most effective when initiated at early stage of project development. Engagement should begin as early as possible in the preparation of the project, because timely identification and consultation with stakeholders enables the views and opinions of these groups to be respected during the development and implementation of the project.

Stakeholder engagement is continuous and iterative process, through which the Borrower identifies, communicates and facilitates two-way dialogue with persons affected by project decision and activities, as well as with other stakeholders interested in the Project. The different needs of various groups and individuals are respected, especially those who are in a disadvantageous position and who are at risk.

In order to adequately meet the needs of different groups, communication and information channels were created for all identified stakeholders in accordance with their needs. A participatory process will be used to obtain comments and suggestions related to the Project design, which can help improve the Project design and bring more benefits at the local level.

The requests, needs and expectations of the stakeholders will be identified before the design of the Project, while the PIU will be obliged to establish sustainable communication with stakeholders, in order to regularly inform them about the project, as well as to report on potential changes.

The aim of this Stakeholder Engagement Plan (SEP) is to improve and facilitate decision-making related to the Project and to create opportunities for timely active participation of all stakeholders, as well as to give all stakeholders the opportunity to express their opinions and concerns that may affect Project decisions. The purpose of this SEP is, therefore, to improve stakeholder engagement throughout the lifecycle of the Project, as well as to implement the stakeholder engagement in accordance with the legislation in the Federation of BiH, as well as the requirements of the Environmental and Social Standards (ESSs) of the World Bank (WB).

Considering the key role of the lignite sector in the economy and society of BiH as well as in the overall energy sector of the country and its Entities, the stakeholders of this Just Transition is very large and diverse, both sectoral and geographically. The potential risks and impacts of the Just Transition may also be comprehensive, which further underlines the need for a wide-reaching and comprehensive stakeholder engagement, covering the employees of directly affected lignite mines and associated power plants, indirect workforces in the coal value chain, government authorities at Municipal, Cantonal, Entity, and State level, affected communities, labor unions, NGOs and CSOs, academics, researchers, private sector, national social and environmental public-sector agencies, and the media. The stakeholders to the lignite transition are thus found at the State, and Entity level and below, and are of various interest and degree of influence.

Of particular concern is the impact of transition on already poor and vulnerable groups: at country-level, informal employment amounts to 30% of total employment and over 16% of all workers are employed on temporary contracts, and 24.5% of workers are working poor. A

higher incidence of in-work poverty is recorded among self-employed (36%) and temporary workers (27.8%), part-time (39.9%) and young workers (31.4%) aged 18-24 years<sup>2</sup>. Women also display lower employment rate, higher unemployment, and higher level of informal employment than men.

### **1.3 Scope and structure of the Stakeholder Engagement Plan**

The scope of the SEP follows the World Bank's Environmental and Social Standard 10 (ESS10). The engagement is planned and will be implemented as an integral part of the Project.

This SEP provides general guidance on how to engage the stakeholders in all phases of the Project. In general, the SEP is developed to: (a) identify and analyze stakeholders including potential beneficiaries of the Project who may be excluded or have problems accessing the benefits of the Project; (b) establish a framework for engagement modalities for consultation and disclosure; (c) enable establishment of platforms to influence decisions related to the Project; (d) define the roles and responsibilities of various actors in the implementation of the SEP; and (g) assist in the implementation and management of the Grievance Mechanism (GM).

The SEP consists of the following chapters:

1. Introduction
2. Regulatory framework
3. Summary of previous stakeholder engagement activities
4. Identification and analysis of stakeholders
5. Stakeholder engagement program
6. Resources and responsibilities for the implementation of the Stakeholder Engagement Plan
7. Grievance mechanism
8. Monitoring and reporting

## **2 REGULATORY FRAMEWORK**

### **2.1 Environmental and Social Standard of the World Bank on the Stakeholder Engagement and Information Disclosure (EES10)**

The WB has, in its Environmental and Social Framework (“Framework”) which became effective in October 2018, committed to taking the path that leads to sustainable development. The Framework specifies the mandatory requirements in the form of 10 standards that Borrowers must apply.

One of those 10 standards is the Stakeholder Engagement and Information Disclosure 10 (ESS 10) which addresses stakeholder engagement. This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

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<sup>2</sup>[www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---sro-budapest/documents/publication/wcms\\_774439.pdf](http://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---sro-budapest/documents/publication/wcms_774439.pdf)

Objectives of ESS10 are the following:

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

According to the definition provided in the ESS10, “stakeholder” refers to individuals or groups who:

- are affected or likely to be affected by the project (project-affected parties); and
- may have an interest in the project (other interested parties).

The ESS10 contains a list of activities within the stakeholder engagement process which need to be implemented by the Borrowers. The stakeholder engagement will involve the following:

- stakeholder identification and analysis;
- planning how the engagement with stakeholders will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances; and
- reporting to stakeholders.

Under ESS10, Borrowers are required to develop and implement a SEP proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before Project Appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. Borrowers are required to update the SEP if significant changes are made to the SEP.

The SEP describes the timing and methods of engagement with stakeholders throughout the life-cycle of the project as agreed between Bank and Borrowers, distinguishing between project affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to project affected parties and other interested parties, as well as the type of information to be sought from them. According to ESS10 the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.

Borrowers are required to develop within the SEP a procedure on addressing and responding to grievances (grievance mechanism to receive and facilitate resolution of project affected parties concerns and grievances). Borrowers are required to implement the grievance

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

## 2.2 Regulations and Requirements at BiH/FBiH levels

*Public participation* in decisions making process in BiH is regulated at all levels of governments in BiH. This is regulated both by the regulations that directly regulate the *obligations of public consultations* and *freedom of access to information* under control of public body, and by regulations that regulate other specific policy areas such as environmental protection, programming of development, and others, as shown in Table 1 below. BiH has acceded the *Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters* in 2008.

**Table 1: BiH/FBiH legal requirements for the public participation relevant for this Project**

<b>State level of Bosnia and Herzegovina</b>	
<i>Law on Freedom of Access to Information in Bosnia and Herzegovina</i> <sup>3</sup>	<p><b>Freedom of Access to Information</b></p> <p>The Law ensures that every natural and legal person has the right to access information that is under the control of a public authority, and every public authority has a corresponding obligation to publish such information. An exception to the publication of the requested information is established only in cases specified by law.</p>
<i>Rules of Consultations in Legislative Drafting</i> <sup>4</sup>	<p><b>Consultations in Legislative Drafting</b></p> <p>The Rules define the general legal framework for consultations with interested public and civil society organizations, i.e., „the groups of citizens that do not belong to the government sector “. The Rules stipulate the obligation of the ministries and institutions to maintain the list of organizations and individuals interested in legislative activities of the relevant institution, which is regularly updated to include new-interested organizations and individuals. All interested citizens and legal entities can directly participate in the drafting of legal regulations. The Rules set the minimal obligations with regards to consultations, which include the obligation of the institution to present the draft of the legal act on its website with invitation for submission of written comments within at minimum 15 days, or 30 days if the document has a significant impact on the public, as well as to submit the draft to the individuals and organizations that are on the institution's list of interested individuals and institutions for public consultations. The Rules also stipulate a special regime of consultations when it comes to legal acts that have „a considerable impact on public“. The legal acts that have a considerable impact on public are those that lead to changes in legal or economic status, harmonization of legislative with</p>

<sup>3</sup> Law on Freedom of Access to Information in Bosnia and Herzegovina (Official Gazette of BiH, No. 28/00, 45/06, 102/09, 62/11 and 100/13).

<sup>4</sup> Published in the "Official Gazette of BiH, No. 5/17.

	<p>international standards and legislative with ecological impact. In case the legal act is qualified as of considerable impact on public, the institutions are obliged to make an additional effort in identifying institutions and individuals that may have an interest in the legislative drafting or that will mostly be affected by it, which are not on the list of organizations or individuals interested in legislative drafting activities of the institution. The forms of additional consultations at the discretion of the respective institution include: seeking written and oral comments through announcements or publication of draft legal acts in printed media; information and education on draft legal act through radio and television; announcements and publishing of draft legal acts on Internet; direct submission of draft legal act to organizations and individuals beyond the institution's list of organizations or individuals; public meetings or round tables with selected organizations or individuals; or working groups that include experts and representatives of organizations and individuals.<sup>5</sup> Pursuant to the revised Rules on Consultations, and in collaboration with EU Delegation to BiH, a web platform (<a href="http://www.eKonzultacije.ba">www.eKonzultacije.ba</a>) for online consultation with citizens and civil society organizations was developed and launched in April 2016.</p>
<p><i>Uniform rules for drafting legal regulations in the institutions of Bosnia and Herzegovina</i><sup>6</sup></p>	<p><b>Regulatory Impact Assessment</b></p> <p>Public participation is also regulated through the provisions on <i>mandatory impact assessment of laws or other policy documents (RIA)</i>. Provisions on RIA was adopted with the aim of contributing to the strengthening of transparency through the involvement of citizens, civil society organizations (trade unions, employers' associations, informal civic groups or initiatives, associations, foundations, private institutions), representatives of academia, chambers and other legal or natural persons influence the laws that are enacted, or that will be included in their implementation, including the public, in the process of drafting, proposing, monitoring the implementation, reporting and evaluation of laws.</p>

<sup>5</sup> See more on <http://europa.ba/wp-content/uploads/2016/11/Mapping-study-of-CSOs-in-BiH.pdf>

<sup>6</sup> Official Gazette of Bosnia and Herzegovina, no. 11/05, 58/14 and 60/14

<p><i>Agreement on Cooperation between the Council of Ministers of BiH and non-governmental organizations in BiH</i></p>	<p><b>Agreement on Cooperation with NGO-s</b></p> <p>In December 2017, the <i>Agreement on Cooperation between the Council of Ministers of BiH and non-governmental organizations in BiH</i> was signed, to establish common values, principles, and priorities of such cooperation. This strengthens the obligation of State level bodies to cooperate with the private sector which will strengthen its capacity to participate in the processes of creating and implementing public policies, thus contributing to their quality and successful implementation. The <i>Sector for Legal Aid and Civil Society Development</i> at the <i>Ministry of Justice of BiH</i> oversees monitoring the implementation of this agreement. The <i>Advisory Council</i> has also been established for cooperation with non-governmental organizations, in 2018.</p>
<p><b>Federation of Bosnia and Herzegovina</b></p>	
<p><i>Law on Free Access to Information in Federation of BiH<sup>7</sup></i></p>	<p><b>Free Access to Information</b></p> <p>This Law ensures the rights of citizens to information and stipulates that all citizens and legal entities have the right to access information in the control of a public authority, and each public authority has a corresponding obligation to disclose such information. An exception to the publication of the requested information is established only in cases specified by law.</p>
<p><i>Law on Principles of Local Self-Governments<sup>8</sup></i></p>	<p><b>Art. 24 to 32 - Local Communities (mjesne zajednice)</b></p> <p>Local self-government in local units of self-government is achieved in <b>local communities as the mandatory form of local self-government</b> established by the council, as well as in urban communities and other forms of local self-government in accordance with the statute of a local unit of self-government. Through the bodies of the local community, citizens in a local community decide on issues of importance for their life and work in the area of the local community by initiating and participating in debates, cooperation and engaging in accordance to Article 25 of the Law.</p> <p><b>Article 43 – Direct participation of citizens in decision-making process in local units of self-government</b></p> <p>Citizens have rights to directly decide on issues from within the competencies of bodies of local units of self-government by means of referendum, local assembly of citizens and other forms of direct declaration of will. Citizens are entitled to submit their proposals through civic initiatives, associations of citizens, nongovernmental</p>

<sup>7</sup> “Official Gazette of FBiH”, No. 32/01 and 48/11;

<sup>8</sup> “Official Gazette of FBiH”, No. 49/06;



	<p>organizations, or in any other way as may be provided by the statute, or they may introduce any other mechanisms of participatory democracy, as long as they are not prohibited by the law.</p> <p><b>Article 56 - Obligatory consultations of local self-governments in the process of legal acts development</b></p> <p>The Law obliged the Federal and Cantonal authorities to consult local self-government units to the greatest extent possible in the process of adopting regulations that directly concern them. Consultation is carried out by the Federal and Cantonal authorities through the association of municipalities and cities. This is significant because it is difficult to find a regulation that does not directly refer to the local self-government unit, i.e. the population, both in regulating rights and obligations, and in their implementation.</p>
<p><i>Law on Environmental Protection of Federation of Bosnia and Herzegovina<sup>9</sup></i></p>	<p><b>Public consultations during Strategic Environmental Impact Assessment (SEA), Environmental Impact Assessment (EIA) and Environmental permit procedures; Strategic Impact Assessment of Federation of BiH Strategy for Environment;</b></p> <p>One of the main principle of the Law is <i>public participation and access to information</i> in realization of environmental protection issues. Every individual and organization must have adequate access to information related to the environment, which is at disposal to public authorities, bodies and organizations, including information about hazardous substances and their activities in their communities, as well as the possibility of participating in decision-making. Chapter VI of the Law (art. 34 to 43) regulates in details access to environmental information and public participation.</p> <p>The Law stipulates the obligation of public authorities to ensure <i>public participation when adopting planning environmental protection documents</i>.</p> <p>In the case of <i>Strategic Environmental Impact Assessment (SEA)</i>, the Law establishes a mandatory phase of participation of interested bodies and organizations; public participation; consultations with interested bodies, organizations and the public of other Entity, i.e. the Brčko District of BiH, or another country, if the execution of a plan, program or strategy may have an impact on the environment of another entity, the Brčko District of BiH or another country.</p> <p>This Law also regulates the <i>Environmental Impact Assessment (EIA)</i> procedure and prescribes that public hearings must be organized for projects that require an Environmental Impact Assessment. The Federal</p>

<sup>9</sup> “Official Gazette of FBiH”, No. 15/21;

	<p>Ministry of Environment and Tourism is obliged to organize a public discussion about the project in the area closest to the location of the given project. The EIA must be made available to the public and a copy sent to relevant authorities and other interested parties, allowing 30 days for submitting comments, after which a public hearing is organized, and the public invited via printed (or electronic) media/radio/TV, at least 15 days in advance.</p> <p>Public consultation is obligatory for issuance of an <i>Environmental permit</i>. The Competent ministry (Federal or Cantonal) informs the public, interested parties and the local self-government unit about the submitted application for the issuance of an <i>environmental permit</i> by publishing it in at least one of the daily newspapers in the territory of the Federation of BiH, and on the ministry's website.</p>
<p><b>Provision of Aarhus Convention<sup>10</sup></b></p>	<p><b>Aarhus Convention</b></p> <p>BiH has acceded the <i>Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters</i> in 2008. The Aarhus Convention grants the public rights regarding <b>access to information, public participation and access to justice</b>, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of a public authority”. In line with the Convention, Borrowers are required to:</p> <ul style="list-style-type: none"> <li>• <i>Respond to requests from the public for environmental information</i> (any member of the public can make a request, regardless of citizenship, nationality or domicile);</li> <li>• <i>Regularly collect and disclose environmental information to the public</i> and notify the public that the information is available; and provide emergency information.</li> </ul> <p>The main pillars of the Aarhus convention are incorporated into the F BiH <i>Law on environment protection</i><sup>11</sup>. The competent authorities are obliged to ensure public participation in environmental impact assessment procedures and environmental permitting procedures. Representatives of the public who participated in the decision-making process have the right to file an appeal against the decision or to initiate an administrative</p>

<sup>10</sup> Official Gazette of BiH-MU", No. 8/08;

<sup>11</sup> Law on Environmental Protection (“Official Gazette of FBiH” No 15/21).



	dispute if there is no second instance body and have the right to initiate proceedings to protect their rights before the competent court.
<i>Decree on Single Methodology for Developing Spatial Planning Documents</i> <sup>12</sup>	<p><b>Public consultations for spatial planning documents</b></p> <p>In line with the Decree, public participation must be ensured during all stages of development of spatial planning documents. Spatial plan developers are required to prepare a Public Participation Program, which includes provisions for public involvement at all stages. In addition, spatial planning documents must contain evidence of public consultations, such as Minutes from public hearings, etc.</p>
<i>Law on Physical Planning and Land Use at Federation of Bosnia and Herzegovina Level</i> <sup>13</sup>	<p><b>Public consultations during the issuing of construction permits</b></p> <p>According to the Law, prior to issuing of Construction Permits, Federal Ministry of Physical Planning has to provide public access to the Main Design, and inform the public by means of a public announcement. The public is allowed 15 days for submission of comments.</p>
<i>Regulation on the rules for participation of the interested public in the procedure of preparation of Federal legal regulations and other acts</i> <sup>14</sup>	<p><b>Consultations in legislative drafting</b></p> <p>All interested citizens and legal entities can directly participate in the drafting of legal regulations. It defines the general legal framework for consultations with interested public and civil society organizations, i.e., „the groups of citizens that do not belong to the government sector “. The Rules stipulate the obligation of the ministries and institutions to maintain the list of organizations and individuals interested in legislative activities of the institution in question, which is regularly updated to include new-interested organizations and individuals.</p>
<i>Law on development planning of Federation of Bosnia and Herzegovina</i> <sup>15</sup>	<p><b>Participation in Strategic planning</b></p> <p>The process of public participation in BiH is also regulated by the Law and bylaws on <i>strategic planning and development governance</i>. The Law incorporate the principle of publicity, transparency, and partnership with representatives of the business and academic community, the non-governmental sector, other interest groups and citizens and the media, in determining development priorities, as well as the principle of social inclusion, gender equality and equal opportunities for all citizens that include non-discrimination, gender equality, rights to cultural, religious and linguistic diversity of all citizens, and the rights of children, the elderly and persons with</p>

<sup>12</sup>Official Gazette of FBiH No. 63/04, 50/07 and 84/10;

<sup>13</sup> Official Gazette of FBiH, No. 2/06, 72/07, 32/08, 4/10, 13/10, 45/10, 85/21 and 92/21);

<sup>14</sup> "Official Gazette of the FBiH", No 51/12;

<sup>15</sup> "Official Gazette of the FBiH" No 32/17;

	<p>disabilities. The law is based on the principles of <i>publicity and transparency, gender equality and equal opportunities for all citizens</i>. Public participation is regulated in more details by the secondary legislation, such as <i>Regulation on the preparation of strategic documents in the Federation of BiH</i><sup>16</sup>. Consultations on strategic documents are carried out by the person in charge of drafting strategic documents. The consultation process begins with publication on the website of the holder of the strategic documents, delivery to competent institutions at lower, same and higher levels of government relevant for strategic documents, organizing public presentations, collecting and considering proposals and suggestions. Consultations last a minimum of 30 days. It is prescribed that competent institutions as formal actors, individual citizens, interest groups, NGOs, universities and other informal actors should be included in the consultation process.</p> <p><i>Federation Development Programing Institute</i> is a public institution of the Federation responsible for the overall process of strategic planning in the Federation of BiH.</p>
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### 3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The first public consultations on decarbonization u BiH took place over the course of the preparation of the *Road Map for Just Transition in Coal Regions BiH*, within the project “*Support to a Just Transition in Coal Regions of Bosnia and Herzegovina*”, under the auspices of WB and MoFTER. Within this framework, in the period from July 2021 to April 2022, more than 20 meetings were held with 81 different groups of actors, attended by 132 stakeholders. Stakeholders were representatives of and government institutions and organization, the energy industry, labor unions, the research and academic community, civil society organizations, and local communities located within and around the mining areas. It was discussed about the planning of decarbonization, how it should be planned and implemented and what would be the consequences for the country and for coal dependent communities. Until then, there has not been any broader public political debate in BiH on decarbonization.

Participants expressed concerns in relation to coal transition focusing on job losses, the risk of mining communities turning into ghost towns due to lack of alternative economic opportunities, and a stress on the importance of local government in the implementation of the transition process. Concerns were also expressed regarding the alternatives for provision of sufficient amounts of electricity supply after the mine closure, bearing in mind that BiH is currently an electricity exporter. The participants mostly stated that they did not have enough information about the obligations undertaken by BiH in terms of decarbonization, nor did they have knowledge about what a Just Transition really entails. The need for ensuring alignment of laws

<sup>16</sup> “Official Gazette of the FBiH”, No 74/19;

across different levels of government, and readjustment of tertiary education to serve the post-coal requirements were also emphasized.

This was also confirmed by the World Bank's, together with the Energy Community Secretariat survey<sup>17</sup>. The survey identified an overall low level of awareness of the concept of the Just Transition. In BiH, 80% of respondents replied "no" or "not sure / maybe" when asked if they were familiar with the concept of the Just Transition. Similarly, 69% of BiH respondents replied that they were not familiar with the efforts of Western Balkans to support and develop sustainable energy alternative resources complementary with the energy transition. For those that responded "yes" (i.e., were familiar), most responses indicate an understanding that the Just Transition is: (1) related to the transition to renewable energy sources, and (2) that it means closure of coal mines and thermal power plants. With regards to the key information that BiH respondents believe should be shared and discussed with the public in coal regions, the number of jobs that will be lost and number of jobs created due to the energy transition was a priority, followed by costs of switching to renewable energy. Television reports and having expert conversations and explanations on popular TV programs were considered the top two best channels to reach and engage the BiH public on dialogue about the energy transition.

Most respondents in BiH expressed that improvement of local environmental conditions and global climate conditions are the most important positive outcomes of the Just Transition. Job losses and increase in electricity prices were the main concerns about potential negative outcomes of the transition in BiH.

Planning for the reorganization and restructuring of the Zenica Coal Mine is underway, and old unproductive mine pits will need to be closed due to safety reasons. This will lead to the reduction in employees. Zenica commenced workforce reductions for Stara Jama pit in late 2023 based on eligibility for retirement, voluntary and involuntary retrenchment.<sup>18</sup> The company prepared the retrenchment plan in line with national law requirements, which is also aligned with World Bank requirements. The consultation with unions and the public employment service were carried out in October and November 2023. Zenica mine also established grievance mechanism for workers to raise any concerns associated with retrenchment and union representatives are members of these grievance committees.

## 4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 4.1 Introduction

ESS10 recognizes two broad categories of stakeholders:

- 1) project-affected parties and
- 2) other interested parties.

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<sup>17</sup> *Western Balkans Coal Regions in Transition Public Perceptions Survey*, carried out across Bosnia & Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia, 2021.

<sup>18</sup> This will not be financed from the Project. The same process for consultations will be followed for other retrenchment that will be part of the Project.

**Project-affected parties** 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** refer 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.

**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.

## 4.2 Stakeholder Identification and Mapping

Stakeholder identification and mapping were performed for all Project components and sub-components. A list of all stakeholders is shown in the Table 2 below. The Table 2 identifies the main State, Entity, Cantonal and Municipal level stakeholders of the post-lignite transition, other interested parties, and vulnerable groups. When mapping the stakeholders from the governmental sectors, the competences established by Constitutions and laws in the creation and execution of relevant policies, BiH, Federation of BiH and Cantonal and Municipal institutions and bodies, were taken into account. The main actors/implementers of the project actions were also identified as **Project Implementing Entities (PIE)**. These actors will have an impact on other people affected by the project. These actors will be responsible for the implementation of stakeholder engagement. The different stakeholder groups obviously differ significantly in terms of their active engagement in the lignite transition as well as in their ability to influence the outcome of the political process related to post-lignite transition<sup>19</sup>.

**Table 2. Stakeholder Identification**

<b>COMPONENT</b>	<b>SUB-COMPONENT</b>	<b>STAKEHOLDER</b>	<b>PAP OIP VG PIE</b>
<b>Component 1. Institutional Strengthening and Project Management</b>	<b>Subcomponent 1.1: State Measures on Just Transition</b>	Ministry of Foreign Trade and Economic Relations of BiH	<i>PIE</i>
		"Elektroprivreda BiH" d.d. Sarajevo	<i>PIE</i>
		Coal Mines Banovići, Kreka, and Zenica	<i>PIE</i>
	<i>Committee on Just Transition and Annual</i>	Federal Ministry of Energy, Mining and Industry	<i>PIE</i>
		TPPs Tuzla and Kakanj	<i>OIP</i>
		State Regulatory Commission for Electricity	<i>OIP</i>

<sup>19</sup> Influence is seen as reflecting the level of resources and power each stakeholder group is assessed to hold, relevant to the issue of post-lignite transition.

COMPONENT	SUB-COMPONENT	STAKEHOLDER	PAP OIP VG PIE
	<i>Just Transition Forum</i>	Independent system operator in BiH and Elektroprivreda BiH (NOS)	OIP
		BiH Ministry of Finance and Treasury	OIP
		Directorate for European Integration	OIP
		Federal Ministries responsible for: Spatial Planning; Finance; Environment and Tourism;	OIP
		FBiH Regulatory Commission for Energy	OIP
		FBiH Operator for renewable energy sources and efficient cogeneration	OIP
		BH Gas d.o.o. Sarajevo; Sarajevogas d.o.o. Sarajevo	OIP
		Chamber of Commerce in the FBiH	OIP
		RS Ministries responsible for: Energy and Mining; Spatial Planning, Construction and Ecology; Finance	OIP
		Foreign Trade Chamber of BiH	OIP
		Government of Brcko District of BiH	OIP
		RS Energy Regulatory Commission	OIP
		RS "Operator of the incentive system (Elektroprivreda RS " a.d. T rebinje)	OIP
		Chamber of Commerce of the RS	OIP
		"Elektroprivreda RS " a.d. T rebinje ,	OIP
		" Elektroprivreda HZHB " d.d. Mostar	OIP
		Gas promet a.d. Pale, Gas-res d.o.o. Banja Luka, Sarajevo - Gas a.d. Istočno Sarajevo	OIP
		Academic Community	OIP
		HoR of BiH PA: Committee for Gender Equality and Committee for Transport and Communications	OIP
		HoP of BiH PA Committee on Foreign and Trade policies, Customs, Transportation and Communications	OIP
	NGOs/CSOs	OIP	
	<b>Subcomponent 1.2:</b> FBiH Measures on Just Transition:  <i>Institutional Strengthening for a Just Transition in FBiH</i>  <i>Policy Development, Legal and Regulatory Updates</i>  <i>Peer-to-Peer Learning and Project Management</i>	Federal Ministry of Energy, Mining and Industry	PIE
		Federal Ministries responsible for: Finance; Spatial Planning; Environment and Tourism; Agriculture, Water Management and Forestry; Labor and Social Policy; Health, Education and Science; Issues of Veterans and Disabled People of the Defense and Liberation War; Development, Entrepreneurship and Crafts	OIP
		Federal Employment Agency and cantonal employment offices	OIP
		Prime Minister of Government of Canton Tuzla	OIP
		Prime Minister of Government of Canton Zenica-Doboj	OIP
		Environmental Protection Fund of FBiH	OIP
		FBiH Regulatory Commission for Energy	OIP
		Federal Institute for Pension and Disability Insurance	OIP
		Federal Institute for Development Planning	OIP
		FBiH Gender Center (FBiH Government)	OIP
		FBiH Associations of Employers	OIP
		Committee on Energy, Mining and Industry of FBiH PA (House of Representatives)	OIP
Committee of Economy of the FBiH PA (House of Peoples)		OIP	
FBiH Inspectorate	OIP		
<b>Component 2:</b>  <b>Repurposing of Post-Mining Lands (Banovic and Kreka) and Closure of Select Underground Works (Zenica)</b>	<b>Subcomponent 2.1:</b> <i>Assessing, Planning and Executing Repurposing</i>	Mines Banovići, Zenica and Kreka	PIE
		Elektroprivreda BiH	PIE
		Municipalities Tuzla and Banovići	PAP
		Informal land users	PAP
		Affected local communities	PAP
		Tuzla Canton and Zenica-doboj Canton Ministries responsible for: spatial planning; environmental protection; agriculture, water management and forestry; finance;	OIP
		Federal ministries responsible for: mining, agriculture, environment and spatial planning	OIP
		Federal Agropedology Institute	OIP

COMPONENT	SUB-COMPONENT	STAKEHOLDER	PAP OIP VG PIE
		Institute for Spatial Planning and Urbanism of Tuzla Canton	OIP
		Institute for Spatial Planning and Construction of Zenica-doboj Canton	
		Relevant Inspectorates in Tuzla Canton and Zenica-doboj Cantons	OIP
		NGOs/CSOs	OIP
		Media (TV, radio, electronic)	OIP
		Contractors, service providers, equipment and material suppliers	OIP
	<b>Subcomponent 2.2:</b> Planning and Executing Closure of Select Underground Work(s)	Mines Banovići, Zenica, Kakanj and Kreka	PIE
		Federal Ministry of Energy, Mining and Industry	PIE
		Elektroprivreda BiH	PIE
		Contractors, subcontractors, supervision consultants, service providers, equipment and material suppliers	PIEs
		Federal Ministries of spatial planning, environment, agriculture	OIP
		FBiH Inspectorate	OIP
		Competent Municipality administrations	OIP
		NGOs/CSOs	OIP
		Media (TV, radio, electronic)	OIP
<b>Component 3: Renewable Power Generation in Banovici and Kreka Mines</b>	Mines Banovici and Kreka	PIE	
	Federal Ministry of Energy, Mining and Industry	PIE	
	Elektroprivreda BiH	PIE	
	Contractors, subcontractors, supervision consultants, service providers, equipment and material suppliers	PIE	
	Federal Ministry of Spatial Planning	OIP	
	FBiH Regulatory Commission for Energy (FERK)	OIP	
	FBiH Operator for renewable energy sources and efficient cogeneration	OIP	
	Informal land users	PAP	
	Municipality administrations	OIP	
	NGOs/CSOs	OIP	
	Media (TV, radio, electronic)	OIP	
	<b>Component 4: Support to Labor Transition in Banovici and Zenica Mines</b>	<b>Subcomponent 4.1</b> <i>Financial obligations</i>	Mines Banovići and Zenica
Workers of Mines Banovići and Zenica			PAP
Elektroprivreda BiH			PIE
<b>Subcomponent 4.2</b> <i>Support the Transition of Mine Workers</i>		FBiH Labor Union of Miners	PAP
		FBiH Independent Labor Unions of Mine Employees	PAP
		Labor Unions of Mines Banovići and Zenica	PAP
<b>Subcomponent 4.3</b> <i>Productive measures for other affected unemployed workers and community engagement</i>		FBiH Ministry of Energy, Mining and Industry	PIE
		Local Communities where mines are located	PAP
		Cantonal and municipal employment offices	PAP
		Contractors, service providers, equipment and material suppliers	PIEs
		Federal Ministry of Labor and Social Policy	OIP
		Zenica-Doboj and Tuzla Cantons Governments	OIP
		Zenica-Doboj and Canton Tuzla Ministries responsible for Labor, Social Policy; Education, Agriculture, Economy	OIP
		FBiH Ministry of Health	OIP
		Federal Institute for Pension and Disability Insurance	OIP
		Federal Ministry for the Issues of Veterans and Disabled People of the Defense and Liberation War	OIP
		FBiH Ministry of Finance	OIP
		FBiH Association of Employers	OIP
		Consultancy services - various experts and trainers	OIP
		Vulnerable individuals /groups such as: returnees and internally displaced people, Roma, people with disabilities, the elderly, and unemployed youth women, poor	VG
		NGOs/CSOs	OIP



<i>COMPONENT</i>	<i>SUB-COMPONENT</i>	<i>STAKEHOLDER</i>	<i>PAP</i> <i>OIP</i> <i>VG</i> <i>PIE</i>
		Media (TV, radio, electronic)	<i>OIP</i>

### 4.3 Disadvantaged/Vulnerable Individuals and Groups

During the preparation for the implementation of the Project, it is important to recognize that the ability to face and engage in the planned social changes would differ significantly among different social and age groups in the FBiH. As indicated above, there are groups in the coal regions who would be particularly vulnerable in view of a Coal Transition, comprising returnees and internally displaced people, people with disabilities, the elderly, and unemployed youth, unemployed, women, poor and marginalized groups like Roma, as well as ‘energy poor households’, unable to afford sufficient heating in their households. Such individuals and groups are 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. Hence, it is important to ensure that the stakeholder engagement strategy be socially inclusive also of the more vulnerable or disadvantaged sections of society.

The Project will take special measures to ensure that disadvantaged/vulnerable individuals or groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of Social specialist by PIU will help to ensure proactive outreach to all population groups. Awareness raising will be conducted in villages to ensure higher participation of targeted population. Focus groups or individual consultation meetings dedicated specifically to disadvantaged/vulnerable individuals or groups will be conducted to gauge their views and concerns.

To ensure that they are not left behind and that their concerns be heard, local NGOs and CSOs may assist in reaching out to these vulnerable groups and try to engage them in consultations. In addition, through-out the transition process, it would be important to arrange special outreach to young people, since their commitment and engagement in the transition process is vital for the country and coal regions. Reaching the youth would involve close cooperation with the educational institutions of the region, youth, and sports clubs as well as the employment offices, and any other organization/association targeting youth.

Of particular concern is the impact of transition on already poor and vulnerable groups: at country-level, informal employment amounts to 30% of total employment and over 16% of all workers are employed on temporary contracts, and 24.5% of workers are working poor. A higher incidence of in-work poverty is recorded among self-employed (36%) and temporary workers (27.8%), part-time (39.9%) and young workers (31.4%) aged 18-24 years<sup>20</sup>. Women also display lower employment rate, higher unemployment, and higher level of informal employment than men.

The human development and economic development trends show vulnerability. The 2018 human development index was 0.769, placing the country in the high human development

<sup>20</sup>[www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---sro-budapest/documents/publication/wcms\\_774439.pdf](http://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---sro-budapest/documents/publication/wcms_774439.pdf)

category. Of critical importance, the population is shrinking and ageing. Out-migration is an urgent challenge, representing a loss of young people and skilled workers upon which future sustainable development will depend. Unemployment stands high at 15.7%<sup>21</sup>, particularly among young people (47.3%), women, persons with disabilities, and Roma.<sup>22</sup>

In addition, a total number of 2,193 persons, that is, 21.61% of the total number of workers in all the coal mines are disabled, of which 2,049 are workers with occupational disability and 144 are war invalids. The highest number of disabled is in the Kreka mine, comprising 544 persons, which is 24.79% of the employees. The disabled employees will be particularly vulnerable in the transition process and targeted social protection efforts will be required.

A particularly marginalized group is the Roma, who is the largest ethnic minority group, comprising 25,000-50,000 persons living in what UNICEF describes as multidimensional, chronic poverty. The largest number live in Tuzla Canton (15-17 000), followed by Sarajevo Canton and Zenica-Doboj Canton.<sup>23</sup> The Roma employment rate is less than others, and significantly less for Romani women (30% less for women against 16% less for men). The rate of Roma without any employment experience is also significantly higher than of others. Roma live in severe poverty, on half the income of the total population in the country.<sup>24</sup>

#### 4.4 Summary of stakeholder engagement needs and Analysis of their Interest and Influence

Identified stakeholders and level of their influence cross-referenced with the interest they may have in the Project will determine the type and frequency of engagement activities necessary for each stakeholder. Adding and populating a matrix (influence and interest) such as the one presented in the Table below can be helpful to determine where to concentrate stakeholder engagement efforts.

**Table 3: Influence and interest matrix**

Level of Influence				Level of Interest
<b>High</b>	Involve/engage	Involve/engage	Partner	
<b>Medium</b>	Inform	Consult	Consult	
<b>Low</b>	Inform	Inform	Consult	
	<b>Low</b>	<b>Medium</b>	<b>High</b>	

The table below identifies the key stakeholders in the Project, the nature of their interest in the Project and level of their interest in and influence over the Project and is based on the color code as given in the matrix above.

<sup>21</sup> Labor force survey, Agency for Statistics of Bosnia and Herzegovina, 2019.

<sup>22</sup> USDSEK Decarbonisation of Residential Sector in Bosnia and Herzegovina, SIDA, April 2020.

<sup>23</sup> <https://www.osce.org/files/f/documents/2/a/110495.pdf>

<sup>24</sup> [www.rcc.int/romaintegration2020/files/user/docs/Roma%20Inclusion%20Index%202015.pdf](http://www.rcc.int/romaintegration2020/files/user/docs/Roma%20Inclusion%20Index%202015.pdf)



Table 4: Level of stakeholder engagement based on their level of interest and level of influence

Project stakeholder group		Nature of interest	Level of Interest	Level of Influence	Level of engagement
Individuals	Workers employed in coal mines (RMUs): Low-skilled, semi-skilled and high-skilled workers	Interested in employment opportunities and/or financial support; social security; reallocation; re-skilling; alternative employment; trainings;	High	Medium	Engage
	Workers employed in firms supplying inputs to mines	Jobs and income; social security; reallocation; re-skilling; alternative employment;	High	Medium	Consult
	People affected by land repurposing	Interest in project impact on their property and livelihoods and understanding the compensation procedure	High	Medium	Consult
	Informal land users	Land repurposing	High	Medium	Consult
	Vulnerable: women-headed households; persons with limited mobility; or persons with disabilities; unemployed; unemployed youth and women; people with lack of education; low literacy and ICT knowledge	Interested in accessibility, affordability of project investments and how the project will affect them	High	Medium	Consult
	Consultancy services: various experts / trainers	Interested in participating in various bidding procedures; consultancy opportunities in job search training, digital literacy skills, basic entrepreneur skills, etc	High	Medium	Consult
Legal entities	RMU Banovići, Kreka, and Zenica	Stakeholder engagement; Land repurposing, reclamation, renewable power generation; closure of underground mine works (Raspotočje pit in RMU Zenica)	High	High	Involve/engage
	TPPs Tuzla and Kakanj	Coal supplied from RMU Zenica (among Kakanj and Breza)	High	Medium	Consult
	Elektroprivreda BiH	Stakeholder engagement; Coal Mines owned by "Elektroprivreda BiH"; joint stock company – 90,37% owned by Federation of BiH;	High	High	Involve/engage
	Independent Labor Union of Miners in FBiH; Independent Labor Union of Mine employers in FBiH; Labor Unions of Mines Banovići, Zenica, and Kreka;	Protecting and defending the interests of all workers in the mining sector; negotiate transition packages	High	Medium	Involve/engage
	Sub-contractors/constructions	Sub-contractors across the value chain of coal mining and electricity production; Interested in participating in various bidding procedures;	High	Medium	Involve/engage
	Sub-contractors/services	Sub-contractors supplying services across the value chain of coal mining and electricity production; Interested in participating in various bidding procedures;	High	Medium	Involve/engage
	Local businesses	Business opportunities	High	Medium	Consult
	Ministry of Foreign Trade and Economic Relations BiH (MOFTER)	Policy formulations, coordination and harmonization of plans and activities of Entities, in the areas of energy, environmental protection, development and use of natural resources (among others); harmonization with and reporting on international treaties	High	Medium	Partner
Ministries of Finance on BiH, FBiH and Cantonal levels	Loan oversight; Budgets;	High	High	Consult	

## Stakeholder Engagement Plan

Project stakeholder group		Nature of interest	Level of Interest	Level of Influence	Level of engagement
Government Agencies and institutions	Municipalities in Cantons Tuzla and Zenica-Doboj and Local Communities (mjesne zajednice)	Determination of the local self-government unit's natural resource management policy and distribution funds generated on the basis of their use; Spatial and urban plans; social protection, education, culture and sports; Land reclamation and repurposing; Issuance of various permits;	High	High	Involve/engage
	Federal Employment Institute; Cantonal employment institute; local employment offices (Tuzla and Ze-Do Cantons)	Strengthening the capacity of Cantonal and local employment offices; Implementation of policies and measures in the field of work and employment, social security of the unemployed, improvement of employment, professional orientation, training and retraining; Labor measures	High	Medium	Partner
	PIU / Federal Ministry of Energy and Mining	Implementing agency for the Project in FBiH. Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination, and procurement and financial management activities in FBiH.	High	High	Partner
	Federal Ministry of Labor and Social Policy	Support to labor transition; employment policy, safety at work, pension and disability insurance, social security and solidarity, protection of civilian victims of war, protection of persons with disabilities, social protection	High	Medium	Involve/engage
	State Regulatory Commission for Electricity	Regulator of electro-energy sector; issuance of the licenses	Medium	Low	Inform
	BiH Ombudsman	Covers HR complaints, equality, monitoring of Freedom of Information Act; prohibition of discrimination	Low	Low	Inform
	FBiH Operator for renewable energy sources and efficient cogeneration	Operationalization of the system of incentives for the production and purchase of electricity from plants that use renewable energy sources and efficient cogeneration	Medium	Low	Inform
	Elektroprenos BiH (NOS)	Approval of the connections to the transmission network	High	Low	Consult
	Independent system operator in BiH (ISO)	Manages the entire BiH transmission network to ensure continuous electricity supply	Medium	Low	Inform
	Federal Ministries responsible for: spatial planning; environment; agriculture; education; development, entrepreneurship and crafts,	Relevant for remediation, repurposing and reclamation of post-mining land, closure of the mine in Zenica; self-employment;	High	High	Involve/engage
	Federal Environmental Fund	Collection and distribution of financial resources for environmental protection	Medium	Medium	Consult
	FBiH Regulatory Commission for Energy (FERK)	Approval of power generation, electricity supply rates; determining the reference price of electricity for plants that use renewable sources and cogeneration	High	Medium	Consult
	FBiH Gender Center (FBiH Government)	Monitors the position of women and the implementation of their guaranteed rights; has the right to investigate the violation of the Law on Gender Equality in BiH, at the request of ministries, citizens and non-governmental organizations or on its own initiative	High	Medium	Consult
	Chambers of Commerce in the FBiH and relevant Cantons	Participation in drafting regulations and measures of development policies, economy support;	Medium	Medium	Consult

### Stakeholder Engagement Plan

Project stakeholder group		Nature of interest	Level of Interest	Level of Influence	Level of engagement
	Federal Institute for Pension and Disability Insurance	Pension services	Medium	Medium	Involve/engage
	BiH Directorate for European Integration	Coordination of approximation to the EU Acquis	Medium	Low	Inform
	ZE-DO Canton Ministries responsible for: spatial planning; environmental protection; agriculture, water management and forestry; finance;	Land reclamation and repurposing; financing of agriculture policy; Labor measures	High	High	Involve / engage
	Tuzla Cantonal Ministries responsible for: spatial planning; environmental protection; agriculture, water management and forestry; economy, finance;	Land reclamation and repurposing; financing of agriculture policy; Labor measures	High	High	Involve / engage
	Various Governmental Inspectorates such as Mining, Labor, Construction, Agriculture, Energy	Interested in enforcement of legal requirements in all aspects of project implementation	High	Medium	Inform
	FBiH Gender Center	Monitors the position of women and the implementation of their guaranteed rights; Provides professional assistance	High	Medium	Inform
	WB	Interested in achievement of Project Development Objectives and compliance to E&S Standards of the Project	High	High	Partner
Academia	Academic community/faculties, research institutions and centers	Interested in sharing knowledge and contributing to capacity building activities	Medium	Low	Inform
Associations, NGO	Association of Employers of the FBiH (UP); and other	Represents the interests of employers and provides the necessary support in business development; Potential concerns over regarding environmental and social impacts and project designs. The project may provide a knowledge sharing avenue.	High	Medium	Consult
	NGOs/CSOs	Community engagement activities; Interested in project benefits. Interest in environmental and social aspects of project as well as community health and safety	High	Medium	Involve/engage
Media	Media (TV, radio, electronic)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	Medium	Low	Inform
Vulnerable groups	Persons living below the poverty line; women; youth; women-headed households; elder-headed households without any other household member bringing in income; persons with limited mobility; or persons with disabilities; People with low literacy and ICT knowledge	Interested in accessibility, affordability of project investments and how the project will affect them	High	Medium	Consult

## 4.5 Stakeholder Expansion

This Project will have various groups of people and economically differentiated groups who are interested in the project on different levels. The Project may need to revisit the list of stakeholders and verify if there is a need to expand the list and engage with other stakeholders in course of the Project implementation. A potential update will be part of the periodic update of the SEP.

**Table 5: 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>	<p>Is our current list focused on relevant stakeholders who are important to our current and future efforts?</p> <p><i>(Answers should be based on knowledge of the Project, feedback received and grievances registered tackling inadequate outreach, and feedback from Stakeholder Engagement)</i></p>
<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>If No the needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited</i>	<p>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?</p> <p><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></p>
<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited</i>	<p>Does the current engagement strategy focus adequately on potential beneficiaries of the Project from all vulnerable groups?</p> <p><i>(Answers should be based on the Stakeholder engagement log relative to the gender aspects and grievances received by all vulnerable individuals/groups focusing on insufficient inclusion and/or access to Project benefits)</i></p>

## 5 STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1 Principles of Stakeholder Engagement

In order to meet best practice approaches, the Project will apply the following principles of stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communication and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups.

### 5.2 Purpose and Timing of Stakeholder Engagement

Stakeholder engagement is designed to establish an effective platform for productive interaction with the project affected parties and other interested parties about the outcome of the Project implementation. 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 outcome and benefits;
- Disseminate Project information;
- Address Project grievances.

### 5.3 Information disclosure

Drafts of all documents required as per provisions of the ESF (i.e. ESMF, ESCP, SEP, LMP, LALRF) will be publicly disclosed at least 15 days before the public consultation on the website of the PIU and the World Bank. Disclosure packages will include:

1. Project announcement, including:
  - a. Brief description of the project
  - b. Description of the agreement on public consultations (time, place...)
  - c. Methods of submitting comments and feedback
  - d. Key deadlines
2. Appropriate draft documents

The public disclosure of the draft documents of the Project will be announced via written and electronic media as well as on social media and website of the PIU, as part of the described overall stakeholder engagement activities described above.

The PIU will review the comments on all disclosed documents. The main comments will be incorporated into the final version of the documents and disclosed, together with a Report on public consultations, i.e. (i) a list of the media in which the announcement was published, (ii) the content of the announcement, (iii) the time of publication, (iv) a list of the received feedback, (v) minutes from public consultations, (vi) list of participants.

Site-specific management instruments developed to manage environmental and social risk and impacts such as Environmental and Social Management Plans (ESMPs), Resettlement Plans (RPs) will be disclosed in the same manner as E&S due diligence documents prepared during Project preparation. PIU will be responsible for conducting related public consultations, collecting and incorporating feedback into the final version of the documents and re-disclosing the documents.

During the Project implementation, the Environmental and Social Specialists, engaged by the PIU, will prepare quarterly reports on E&S performance of the activities implemented in respective sub-project locations which will include an update on implementation of the stakeholder engagement plan. The quarterly reports will be disclosed on the website of the PIU.

During the Project implementation, quarterly updates from the GM shall be available on the website of the PIU. The updates shall be disaggregated by gender, type of grievances and updated regularly.

Contractors' documents related to management of environmental and social risks (these may include ESMPs, Traffic Management Plan, Codes of Conduct for Employees and Contracted workers etc.) shall be made available at PIU's and Contractors' website, as appropriate. Information on timing of civil works and related information shall be made public via various media, newspaper and radio, as soon as possible and at least 2 weeks prior to actual execution.

Table 6 briefly describes what kind of information will be disclosed, in what forms, and the types of methods that will be used to communicate this information to target the wide range of stakeholders group.

Table 6: Information disclosure methods

Target stakeholders	Information/documents to be disclosed	Disclosure channel	Timing/ Frequency	Responsibilities
All stakeholders	<ul style="list-style-type: none"> <li>Project ESF documents (ESMF, SEP, LALRF, LMP)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI</li> </ul>	Upon completion of the drafts documents to enable public consultations, then disclose final versions	<ul style="list-style-type: none"> <li>PIU/FMERI</li> </ul>
	<ul style="list-style-type: none"> <li>Sub-project ESMPs, RAPs</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Local Governments</li> </ul>	Upon completion of the drafts documents to enable public consultations, then disclose final versions	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>Brief reports on project progress</li> <li>Summaries of stakeholder engagement activities</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/ FMERI and Local Governments</li> </ul>	Quarterly	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>Beneficiary surveys (including mine workers and community members beyond the mine)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Local Governments</li> </ul>	Annually	<ul style="list-style-type: none"> <li>Transition Committees at state, the entity and municipal levels</li> </ul>
	<ul style="list-style-type: none"> <li>Project announcements (timing of project activities and related information)</li> <li>Invitations to public consultations</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Local Governments</li> <li>Publications via various media and press releases</li> </ul>	Regularly in line with project dynamics	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>Roadmap for Just Transition in Coal Regions of BiH</li> </ul>	<ul style="list-style-type: none"> <li>Workshop with key stakeholders / focus groups</li> <li>Websites of PIU/MoFTER/FMERI and Local Governments</li> <li>Republika Srpska governments' websites</li> <li>Publication of the draft Roadmap for Just Transition in Coal Regions of BiH</li> <li>Local Radio &amp; TV coverage</li> <li>Publications via various media and press releases</li> </ul>	Upon completion of the drafts documents to enable public consultations, then disclose final versions	<ul style="list-style-type: none"> <li>Council of Ministers of BiH/MoFTER/ PIU/FMERI</li> <li>Responsible departments in Cantons and Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>FBiH Strategy on Just Transition</li> <li>Plan for Implementation of FBiH Strategy on Just Transition</li> <li>Relevant laws and/or their amendments on spatial planning, environment, public employment service, social assistance,</li> </ul>	<ul style="list-style-type: none"> <li>A series of workshops with key stakeholders 7 focus groups</li> <li>Publication of the draft FBiH Strategy on Just Transition and the Plan</li> <li>Websites of PIU/MoFTER/FMERI and Local Governments</li> <li>Publications via various media and press releases</li> </ul>	Upon completion of the drafts documents to enable public consultations, then disclose final versions	<ul style="list-style-type: none"> <li>FBiH Parliament</li> <li>Government of FBiH</li> <li>PIU/FMERI</li> <li>Responsible departments in Canton and Local Governments</li> <li>FBiH Employment Agency and Cantonal</li> </ul>

Stakeholder Engagement Plan

Target stakeholders	Information/documents to be disclosed	Disclosure channel	Timing/ Frequency	Responsibilities
		<ul style="list-style-type: none"> <li>Local Radio &amp; TV coverage</li> </ul>		
	<ul style="list-style-type: none"> <li>Land Repurposing Master Plans for Banovići, Zenica and Kreka Mines</li> <li>Renewable Power Generations and Feasibility Studies for Banovici and Zenica Mines</li> <li>Labor Transition Plans for Banovici and Zenica Mines</li> <li>Zenica Mine Closing Plan (starting with Raspotočje pit Section)</li> <li>Lands Repurposing Plan for Zenica Mine</li> <li>Closure plans for the selected underground works for Zenica, Kreka and Kakanj</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Local Governments</li> <li>Notice boards at coal mines</li> <li>Publications via various media and press releases</li> </ul>	Upon completion of the drafts documents to enable public consultations, then disclose final versions	<ul style="list-style-type: none"> <li>Elektroprivreda BiH / Banovići Mine /Government of FBiH/ FMERI / Responsible departments in Local Governments</li> </ul>
All PAPs and Vulnerable individuals/households	<ul style="list-style-type: none"> <li>Information about the Grievance Redress Mechanism (GRM) process (incl. info on local admission points)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Local Governments</li> <li>Notice boards / info-desks of Local Governments/local communities in sub-project areas</li> <li>Leaflet containing information on GRM</li> <li>Publications via various media and press releases</li> </ul>	Upon sub-projects identification	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
PAPs and Vulnerable individuals/households: <ul style="list-style-type: none"> <li>Labor Unions of FBiH, Banovići, Zenica and Kreka</li> <li>Workers of Mines Banovici, Zenica and Kreka;</li> <li>Local businesses communities</li> <li>Local communities</li> <li>Unemployed workers;</li> </ul>	<ul style="list-style-type: none"> <li>Establishment of In-House Labor Transition Units in the Mines</li> <li>Information on Voluntary Cash Incentives and productive measures to support the transition into alternative work</li> <li>Information on strengthening the capacity of local and Cantonal Employment Offices</li> <li>Labor Market Measures</li> <li>Measures and early retirement incentives</li> </ul>	Websites of: <ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Local Governments/local communities in sub-project areas</li> <li>Cantonal Employment Offices</li> <li>Local Employment Offices</li> <li>Publications via various media and press releases</li> </ul> Notice boards / info desk at coal mines Face to face meetings – if needed Consultations with communities and workers	Upon sub-projects identification	<ul style="list-style-type: none"> <li>Mines Banovići, Zenica, Kakanj and Kreka, and Labor Unions</li> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> <li>Cantonal Employment Offices</li> <li>Local Employment Offices</li> </ul>



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Target stakeholders	Information/documents to be disclosed	Disclosure channel	Timing/ Frequency	Responsibilities
		Written information – brochures, posters, leaflets, websites		
<p>PAPs:</p> <ul style="list-style-type: none"> <li>People affected by land use change</li> <li>Informal land users</li> </ul> <p>Vulnerable individuals/households</p>	<ul style="list-style-type: none"> <li>Land acquisition process</li> <li>Resettlement and livelihood restoration options</li> <li>Compensation rates and methodology</li> <li>GRM to address resettlement related complaints (incl. info on local admission points)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Cantonal and Local Governments</li> <li>Notice boards / info-desks of Local Governments/local communities in sub-project areas</li> <li>Consultations with communities, and face to face meetings if needed</li> <li>Leaflet containing information on GRM</li> <li>Publications via various media and press releases</li> </ul>	Upon identification of sub-projects' land use change and resettlement requirements	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
<p>OIPs</p> <ul style="list-style-type: none"> <li>Sub-contractors, suppliers</li> <li>Sub-contractors, services</li> <li>Sub-contractors, construction</li> </ul>	<ul style="list-style-type: none"> <li>Process of Repurposing of Selected Areas of the Mine Banovići</li> <li>Design and Construction of Renewable Power Generations</li> <li>Lands Repurposing of Former Mining Lands in Mine Zenica</li> </ul>	<ul style="list-style-type: none"> <li>Contractors' website</li> <li>Hard copies of Project and sub-projects' documents in companies' premises/works sites</li> </ul>	Before start of works/services	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Contractors/sub-contractors/supervision consultants/ service providers/suppliers</li> </ul>
<p>OIPs:</p> <ul style="list-style-type: none"> <li>Supervision consultants,</li> <li>Various consultancy services: experts and trainers</li> </ul>	<ul style="list-style-type: none"> <li>Labor GRM process</li> <li>OHS measures, risks during construction works, waste and hazardous materials management precautions, PPE</li> <li>Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>Contractors' website</li> <li>Hard copies of Project and sub-projects' documents in companies' premises/works sites</li> </ul>	Before start of works/services	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Contractors/sub-contractors/supervision consultants/ service providers/suppliers</li> </ul>
<p>OIPs:</p> <ul style="list-style-type: none"> <li>Representatives of BiH, FBiH and Cantonal Governments and Ministries;</li> <li>Municipalities in Zenica–Doboj and Tuzla Cantons</li> <li>Cantonal and Local Employment Offices</li> <li>Local NGOs/CSOs</li> <li>FBiH Association of</li> </ul>	<ul style="list-style-type: none"> <li>Invitations to meetings</li> <li>Invitations to public consultations</li> <li>Project documents</li> </ul>	<ul style="list-style-type: none"> <li>Official correspondence (e-mail/ Fax/ post)</li> </ul>	Regularly in line with project dynamics	<ul style="list-style-type: none"> <li>PIU/FMERI</li> </ul>

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Target stakeholders	Information/documents to be disclosed	Disclosure channel	Timing/ Frequency	Responsibilities
<ul style="list-style-type: none"> <li>Employers</li> <li>Academic community /faculties, research institutions and centers</li> <li>BiH Foreign Trade Chamber, and Chambers of Commerce of FBiH, Cantons and Municipalities</li> </ul>				
<p>OIPs:</p> <ul style="list-style-type: none"> <li>Media (TV, radio, electronic)</li> </ul>	<ul style="list-style-type: none"> <li>Project announcements (timing of project activities and related information)</li> <li>Invitations to public consultations</li> <li>Information on planned meetings</li> <li>Other relevant project information, as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>Official correspondence (e-mail/ Fax/ post)</li> </ul>	Regularly in line with project dynamics	<ul style="list-style-type: none"> <li>PIU/FMERI</li> </ul>

## 5.4 Planned Stakeholder Engagement Activities

Stakeholder engagement activities are proposed to provide stakeholders with relevant information and opportunities to voice their views on topics that matter to them. Stakeholder engagement will also be gender appropriate. The project will encourage the participation of women and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits. The project will carry out targeted consultations with vulnerable individuals and groups to understand their concerns/needs in terms of accessing information.

The activity types and their timing are adapted to the three main project stages:

- Project preparation (including preparation of ESMF, ESCP, LMP, LALRF, and SEP; preparation of site-specific LALRPs and ESMPs);
- Project implementation (including calls for grant applications, procurement of contractors and supplies, provision of services/civil works);
- Project monitoring (during and after project implementation).

Specific SEP strategies for stakeholder engagement for all Project activities shall be prepared when more details of the activities and their locations are known. Each specific SEP strategy for stakeholder engagement shall revisit the list of identified stakeholders and their analysis and 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.

Consultations and involvement of employees in decision-making is regulated by the Labor Act. The Law regulates establishment of the **Council of Employees** (Art 119). An employer employing at least 30 employees shall be entitled to establish a Council of employees to act on their behalf with the employer in protection of their rights and interests. If no Council of Employees was established with the employer, the trade union shall have the obligations and the powers of the Council of employees in accordance with the law. It shall be established at the proposal of the representative trade union or at least 20% of employees working with the employer.

When it comes to the consultations related to retrenchment, Article 109 of the Labor Act in the FBiH establishes an obligation for an employer who employs more than 30 workers, and who, **in the next three months**, intends to cancel the employment contract of at least five workers due to economic, technical or organizational reasons, is obliged to **consults with the Council Employees and the Trade Union**. The employer is obliged to draw up a **Redundancy Management Program**. Consultation on this Program must begin at least 30 days before the notice of dismissal is given to the affected workers. The Program in written form must be submitted to the Council of employees and Trade Union before the consultation begins, and shall contain, in particular, the following information:

- reasons for the anticipated cancellation of the employment contract;
- the number, category and gender of workers whose contracts are subject to dismissal;
- measures that the employer believes can be used to avoid some or all of the planned layoffs (eg, reassignment of workers to another position with the same employer, retraining where necessary,

- temporary reduction of working hours);
- measures that the employer considers could help workers find employment with another employer;
- measures that the employer considers can be taken in order to requalify the worker for employment with another employer.

If within a period of one year from the termination of the employment contract, the employer intends to employ workers with the same qualifications and level of professional education or in the same workplace, before employing other persons, he is obliged to offer employment to those workers whose employment contracts have been cancelled.

Although the Labor Act prescribes obligatory consultations with the Council of Employees and Trade Unions, there is no obligation prescribed to provide a summary of the received feedback from the Council of Employees or Trade Union, and a brief explanation of how the feedback was taken into account, or the reasons why it is not, as it has been requested by ESS10. Neither the method of the Workers' Council's declarations nor the results and conclusions of the conducted consultation, nor to whom it is submitted, are prescribed. However, the Article 17 of the **Law on Council of Employees**<sup>25</sup> obliged the employers to consult and obtain the prior consent on the issues that are of interest to the economic and social situation of the employees, and especially about the employer's intention to cancel the employment contract for more than 10% of the employees, but at least five, due to economic, technical or organizational reasons, and about the employment, transfer and dismissal plan, and other reasons. The employer's decision made contrary to the provisions of this Act on the obligation to consult with the employees' council is null and void.

However, in exercising individual rights arising from labor relations, an employee may seek the exercise of these rights before the employer, competent court and other authorities, in accordance with the Labor Act (art 113). Article 113 of the Labor Act prescribed the instruments on protection of the individual rights arising from labor relations. An employee may request the employer to respect such right within 30 days from the day on which the decision that had violated his right was delivered, and/or from the day on which the violation of the right came to his knowledge. If the employer fails to meet such request within 30 days from the day on which the request for the protection of the right was filed or an agreement on peaceful dispute resolution referred to in Article 116(1) of the Labor Act was reached, the employee may file a legal action with the competent court within further 90 days. However, an employee who did not submit to his employer the request may not seek protection of the violated right before the competent court, except in the case of the employee's request for the payment of damages or another monetary claim arising from labor relations.

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<sup>25</sup> "Official Gazette of the FBiH" no. 38/04.

Table 7: Summary of proposed strategy for consultation

Target stakeholders	Topic of consultation	Consultation method	Location/frequency	Responsibilities
<b>Project preparation (including preparation of ESMF, ESCP, LMP, LALRF, and SEP; preparation of site-specific LALRPs and ESMPs);</b>				
All key stakeholders	<ul style="list-style-type: none"> <li>Project ESF documents (ESMF, SEP, LALRF, LMP)</li> </ul>	Public consultation meetings	Tuzla Cantons Zenica Dobojo Canton  After approval of the documents by the WB	<ul style="list-style-type: none"> <li>MoFTER</li> <li>PIU/FMERI</li> </ul>
	<ul style="list-style-type: none"> <li>Sub-project ESMPs, RAPs</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Cantons and Local Governments</li> </ul>	Upon completion of the draft documents	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Cantons and Local Governments</li> </ul>
All stakeholders	<ul style="list-style-type: none"> <li>Brief reports on project progress</li> <li>Summaries of stakeholder engagement activities</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/ FMERI and Local Governments</li> </ul>	Quarterly	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Cantons and Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>Project announcements (timing of project activities and related information)</li> <li>Invitations to public consultations</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Cantonal and Local Governments</li> <li>Publications via various media and press releases</li> </ul>	Regularly in line with project dynamics	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Cantons and Local Governments</li> </ul>
	<ul style="list-style-type: none"> <li>Beneficiary surveys (including mine workers and community members beyond the mine)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/ FMERI and Local Governments;</li> <li>Focus Groups;</li> </ul>	Annually	<ul style="list-style-type: none"> <li>Transition Committees at state, the entity and municipal levels</li> </ul>
	<ul style="list-style-type: none"> <li>Roadmap for Just Transition in Coal Regions of BiH</li> </ul>	<ul style="list-style-type: none"> <li>Workshop with key stakeholders in BiH</li> <li>Publication of the draft Roadmap for Just Transition in Coal Regions of BiH</li> <li>Websites of MoFTER, PIU/FMERI, RS and FBiH Governments, Cantons, and Local Governments</li> <li>Local Radio &amp; TV coverage</li> </ul>	Upon completion of the document / (and regularly after amendments)	<ul style="list-style-type: none"> <li>Council of Ministers of BiH, MoFTER, PIU/FMERI, RS Ministry of Energy and Mining</li> <li>Responsible departments in Canton Local Governments</li> </ul>

Target stakeholders	Topic of consultation	Consultation method	Location/frequency	Responsibilities
		<ul style="list-style-type: none"> <li>Publications via various media and press releases.</li> </ul>		
<b>Project implementation (including calls for grant applications, procurement of contractors and supplies, provision of services/civil works)</b>				
<ul style="list-style-type: none"> <li>Workers of Banovici, Zenica, Kakanj and Kreka Mines</li> <li>Labor Unions</li> <li>Local businesses communities</li> <li>Local communities</li> <li>People affected by land use change / resettlement</li> <li>Informal land users</li> <li>Cantonal and Local Employment Offices</li> <li>Municipalities in Zenica–Doboj and Tuzla Cantons</li> <li>Chambers of commerce</li> <li>Vulnerable groups /households</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholders' needs for capacity building, equipment, services</li> </ul>	<ul style="list-style-type: none"> <li>Consultation meetings</li> </ul>	Before the procurement of goods and services	<ul style="list-style-type: none"> <li>Elektroprivreda BiH</li> <li>PIU/FMERI</li> <li>Responsible departments in Canton and Local Governments</li> </ul>
<ul style="list-style-type: none"> <li>Workers in mines</li> <li>Local businesses communities</li> <li>Local communities</li> <li>Vulnerable individuals/households</li> <li>People affected by land use change / resettlement</li> <li>Informal land users</li> <li>Cantonal and Local Employment Offices</li> <li>Local NGOs/CSOs</li> <li>Academic community /faculties</li> <li>Representatives of FBiH, and Cantonal Governments</li> <li>Municipalities in Zenica–Doboj and Tuzla Cantons</li> </ul>	<ul style="list-style-type: none"> <li>Land Repurposing Master Plan for Banovići Mine</li> <li>Lands Repurposing Plan for Zenica Mine</li> <li>Lands Repurposing Plan for Zenica Mine</li> <li>Renewable Power Generations and Feasibility Studies for Banovici and Zenica Mines</li> <li>Labor Transition Plans for Banovici and Zenica Mines</li> <li>Zenica Mine Closing Plan (starting with Raspotočje pit Section)</li> <li>Information about the Grievance Redress Mechanism (GRM) process (incl. info on local admission points)</li> </ul>	<ul style="list-style-type: none"> <li>Public and separate meetings</li> <li>A series of workshops with key stakeholders</li> <li>Publication at websites of PIU/FMERI and Cantonal and Local Governments</li> <li>Publications via various media and press releases</li> <li>Local Radio &amp; TV coverage</li> <li>Disclosure of hard copies of the documents at designated public locations in affected local communities</li> <li>Notice boards / info-desks of Local Governments/local communities in sub-project areas</li> <li>Leaflet with information on GRM</li> </ul>	Upon completion of the drafts documents	<ul style="list-style-type: none"> <li>Elektroprivreda BiH</li> <li>Government of FBiH</li> <li>PIU/FMERI</li> <li>Responsible departments in Canton Local Governments</li> <li>Banovići and Zenica Mines</li> </ul>

Target stakeholders	Topic of consultation	Consultation method	Location/frequency	Responsibilities
<ul style="list-style-type: none"> <li>• People affected by land use change / resettlement</li> <li>• Informal land users</li> <li>• Vulnerable individuals/households</li> </ul>	<ul style="list-style-type: none"> <li>• Land use change process</li> <li>• Compensation rates and methodology</li> <li>• LMPs (applicable to the Project) for potential job seekers</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings with PAPs</li> <li>• Websites of PIU/FMERI and Cantonal and Local Governments</li> <li>• Notice boards / info-desks of Local Governments/local communities in sub-project areas</li> <li>• Leaflet containing information on GRM</li> <li>• Publications via various media and press releases</li> </ul>	<p>Upon identification of sub- projects' land use change and resettlement requirements</p>	<ul style="list-style-type: none"> <li>• PIU/FMERI,</li> <li>• Elektroprivreda BiH</li> <li>• Responsible departments in Local Governments</li> </ul>
<p>PAPs and Vulnerable individuals/households:</p> <ul style="list-style-type: none"> <li>• Labor Unions of FBiH, Banovići, Kreka, Kakanj and Zenica</li> <li>• Workers of Mines Banovici, Kreka, Kakanj and Zenica;</li> <li>• Local businesses communities</li> <li>• Local communities</li> <li>• Sub-contractors</li> <li>• Cantonal and Local Employment Offices</li> <li>• Various consultants / trainers</li> <li>• Local NGOs/CSOs</li> <li>• Academic community /faculties, research institutions and centers</li> <li>• Chambers of Commerce</li> <li>• FBiH and Cantonal governmental institution</li> </ul>	<ul style="list-style-type: none"> <li>• Establishment of Labor Transition Units in the Mines</li> <li>• Voluntary Cash Incentives and productive measures to support the transition into alternative work</li> <li>• Strengthening the capacity of local and Cantonal Employment Offices</li> <li>• Labor Market Measures</li> <li>• Measures and early retirement incentives</li> <li>• Productive measures for other affected unemployed workers and community engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Public/community meetings,</li> <li>• Trainings/workshops;</li> <li>• Separate consultation meetings for vulnerable / women;</li> <li>• Individual outreach to APs;</li> <li>• Mass/Social Media communication;</li> <li>• Disclosure of written information - brochures, posters, leaflets, websites;</li> <li>• GRM;</li> <li>• Local monthly newsletter;</li> <li>• APs/VIGs satisfaction survey.</li> </ul>	<p>Upon identification of sub-projects and as needed</p>	<ul style="list-style-type: none"> <li>• PIU/FMERI,</li> <li>• Elektroprivreda BiH</li> <li>• Mines Banovici, Kreka, Kakanj and Zenica</li> <li>• Cantonal and Local Employment Offices</li> <li>• Contractors/ sub-contractors</li> </ul>
<ul style="list-style-type: none"> <li>• Contractors, sub-contractors, supervision consultants, service providers, equipment and material suppliers, and their worker</li> </ul>	<ul style="list-style-type: none"> <li>• E&amp;S principles, risks and mitigation measures</li> <li>• Sensitization to inclusion/exclusion, labor issues, gender-based violence risks</li> <li>• Workers' GM process</li> <li>• OHS measures, risks during construction works, waste and</li> </ul>	<p>Trainings</p>	<p>Upon signing of contracts</p>	<ul style="list-style-type: none"> <li>• PIU/FMERI</li> <li>– Contractors/sub-contractors/supervision consultants/service providers/suppliers</li> </ul>

Target stakeholders	Topic of consultation	Consultation method	Location/frequency	Responsibilities
	hazardous materials management precautions, PPE <ul style="list-style-type: none"> <li>Code of Conduct</li> </ul>			
PAPs: <ul style="list-style-type: none"> <li>People affected by land use change / resettlement</li> <li>Informal land users</li> </ul> Vulnerable individuals/households	<ul style="list-style-type: none"> <li>Land use change process</li> <li>Resettlement and livelihood restoration options</li> <li>Compensation rates and methodology</li> <li>GRM to address resettlement related complaints (incl. info on local admission points)</li> </ul>	<ul style="list-style-type: none"> <li>Websites of PIU/FMERI and Cantonal and Local Governments</li> <li>Notice boards / info-desks of Local Governments/local communities in sub-project areas</li> <li>Leaflet containing information on GRM</li> <li>Publications via various media and press releases</li> </ul>	Upon identification of sub- projects' land use change and resettlement requirements	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Responsible departments in Local Governments</li> </ul>
OIPs: <ul style="list-style-type: none"> <li>Supervision consultants,</li> <li>Various consultancy services: experts and trainers</li> </ul>	<ul style="list-style-type: none"> <li>Labor GRM process</li> <li>OHS measures, risks during construction works, waste and hazardous materials management precautions, PPE</li> <li>Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>Contractors' website</li> <li>Hard copies of Project and sub-projects' documents in companies' premises/works sites</li> </ul>	Before start of works/services	<ul style="list-style-type: none"> <li>PIU/FMERI</li> <li>Contractors/sub-contractors/supervision consultants/ service providers/suppliers</li> </ul>
OIPs: <ul style="list-style-type: none"> <li>Media (TV, radio, electronic)</li> </ul>	<ul style="list-style-type: none"> <li>Project announcements (timing of project activities and related information)</li> <li>Invitations to public consultations</li> <li>Information on planned meetings</li> <li>Other relevant project information, as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>Official correspondence (e-mail/ Fax/ post)</li> </ul>	Regularly in line with project dynamics	<ul style="list-style-type: none"> <li>PIU/FMERI</li> </ul>
<b>Monitoring</b>				
Beneficiaries of grants	Collect feedback on satisfaction with Grant program application and implementation support	<ul style="list-style-type: none"> <li>Satisfaction survey for program beneficiaries</li> </ul>	Six months after grant disbursement	<ul style="list-style-type: none"> <li>PIU/FMERI</li> </ul>



Once the sub-projects are identified, PIU will organize project **launch meetings** and consult the PAPs and OIPs on the project documents. The respective Local Governments will assist the PIU in organization of public/community meetings in all settlements throughout the project's lifecycle. The Project will include targeted consultation meetings for vulnerable/women to better understand needs, expectations, and concerns of these population groups in relation to the Project. The feedback received at these meetings will be documented along with measures that the Project will take to address the feedback received.

**Mass/social media communication:** The PIU shall engage a Social Specialist who shall be inter alia responsible for outreach and assisting the PIU in disclosure, dissemination of information and communication with the local population. Information on the Project will be communicated to the public on regular basis in various types of media, such as local and national TV, radio, newspapers, electronic media web portals, social media.

**Communication materials:** PIU will disclose written information to the public via a variety of communication materials including brochures, leaflets, posters, etc. PIU will also update its website regularly (at least on a quarterly basis) with key project updates and reports on the project's environmental and social performance both in English and Bosnian/Serbian/Croatian. The website will also provide information about the grievance mechanism for the project.

**Grievance mechanism:** A specific grievance mechanism will be set-up for the Project. A leaflet containing GRM procedure shall be created by the PIU and disseminated to the PAPs and other interested parties in public meetings during each phase of the project, as well as placed in local communities' offices, to help local residents become familiar with the grievance redress channels and procedures. Internal GRM training will also take place for LGs' and contractors' staff. Information on GRM process will also be made available at PIU and LGs websites. The grievance mechanism is described in more detail in Chapter 7.

**Information Desks** will be set up in affected LGs' premises to provide local residents with information on stakeholder engagement activities, construction updates, contact details of the PIU. Hard copies of project documents, brochures, leaflets will be made available at these information desks.

**Satisfaction survey:** PIU will conduct sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iii) quality of the communication and dialogue with the internal stakeholders (PIU, Contractor, GRM, etc.) during construction works. The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. The survey data will be disaggregated by age, gender and location. Survey results with proposed corrective measures will be published on PIU website and discussed at consultation meetings. The survey will be carried out twice during the project's lifecycle: once around the mid-implementation phase, and once towards the end of the project's implementation.

**Trainings, workshops:** Trainings on a variety of social and environmental issues will be provided to relevant government or non- government service providers, contractors, and their

workers. Issues covered will include sensitization to inclusion/exclusion, labor issues, gender-based violence risks, etc.

### **5.5 Proposed Strategy to Incorporate the View of Vulnerable Groups**

The Project will take special measures to ensure that disadvantaged and vulnerable individuals and groups have equal opportunity to access information, provide feedback, or submit grievances. To the extent possible, project indicators will be tracked and disaggregated by gender and vulnerable groups. The consultation activities will be based on the principle of inclusiveness, i.e. engaging all segments of the local society, including vulnerable individuals and groups.

Some of the strategies that will be adopted to effectively engage with vulnerable individuals and groups will be:

- communication and partnership with community-based organizations providing support to vulnerable and marginalized individuals and groups (such as the Red Cross, organizations dealing with people with disabilities, women organizations) to develop messaging and communication strategies to reach these groups;
- where necessary use appropriate local language or visual aids in case of low literacy;
- provide information to people who have specific communication needs in accessible formats, share messages in understandable ways for people with intellectual, cognitive and psychosocial disabilities;
- regularly hold separate small group discussions with vulnerable groups/their representatives to consult with these groups;
- use adequate communication channels tailored to the needs of vulnerable individuals and groups (e.g. TV/radio for the elderly and rural/distanced communities).

## 5.6 Strategy for Engagement of Vulnerable Groups

The Project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. To the extent possible, project indicators will be tracked and disaggregated by gender and vulnerable groups. The consultation activities will be based on the principle of inclusiveness, i.e. engaging all segments of the local society, including vulnerable individuals and groups.

Some of the strategies that will be adopted to effectively engage with vulnerable individuals and groups will be:

- communication and partnership with community-based organizations providing support to vulnerable and marginalized groups (such as the Red Cross, Roma information center, organizations dealing with people with disabilities, women organizations) to develop messaging and communication strategies to reach these groups;
- where necessary use appropriate local language or visual aids in case of low literacy;
- provide information to people who have specific communication needs in accessible formats, share messages in understandable ways for people with intellectual, cognitive and psychosocial disabilities;
- regularly hold separate small group discussions/consultations with vulnerable groups/their representatives to consult with these groups, in areas that are easily accessible for them;
- use adequate communication channels tailored to the needs of vulnerable groups (e.g. TV/radio for the elderly and rural/distanced communities).

## 5.7 Timeline

The timeline for major project phases will be defined at a later stage. After each public consultation, there will be a deadline for submission of further comments in writing (on-line, by letter etc.) of 15 days. Information and contact details for the receipt of written comments will be shared during the consultation meetings.

## 5.8 Review of Comments

PIU will be responsible for gathering comments from the stakeholders (written or oral) for ESF documents, as well as other disclosed documents. During the public consultations on disclosed documents, oral comments will be gathered and summarized in the Minutes of the consultations. The minutes of consultations will be supplemented with any written comments received within the deadline after the consultation.

Comments will be reviewed immediately upon arrival by the PIU's Environmental and Social Specialist. The comments will be entered into a form with official responses to each issue raised. This response form, as part of the Minutes of the consultations, will be shared on website of the PIU. The Minutes and response form will be available in English and local languages.

## 5.9 Future Project Phases

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the SEP and GM. During the Project implementation phase, the Environmental and Social Specialist, engaged by PIU, will prepare quarterly reports on E&S performance for the PIU which will include an update on implementation of the SEP (reports of stakeholder engagement activities). The quarterly reports will be disclosed on the website of the PIU.

During the Project implementation quarterly updates from the GM shall also be available on the website of the PIU. The updates shall be disaggregated by gender, type of grievances and updated regularly.

#### **5.10 Consultation on Stakeholder Engagement Plan**

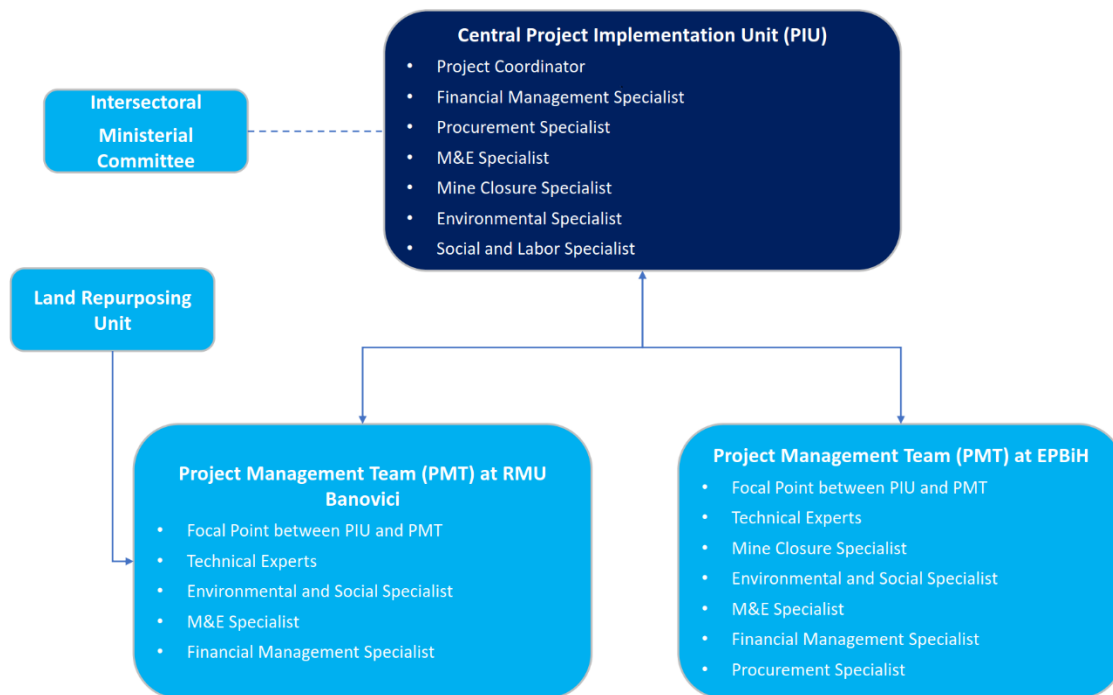
The SEP document (both in English and in Bosnian/Croatian/Serbian) will be published on the official websites of the PIU/FMERI in FBiH, and on the official websites of the LGs, as well as sent directly to relevant stakeholders with an invitation to provide written comments. The public will be informed about the consultation process through available online tools, public announcements in media, notice boards in local communities, etc. Consultations will be organized by PIU using various online channels (e-mail, PIU/FMERI websites, social media, etc.), and records of these virtual discussions will be reflected in the final document of the SEP.

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

## 6 RESOURCES AND INSTITUTIONAL RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT PLAN

### 6.1 Roles and responsibilities

The Project will be managed by FMERI through a **Project Implementation Unit (PIU)**, supplemented by **Project Management Teams (PMTs) in RMU Banovici and EPBiH**. The PIU in FMERI will be established no later than one month following the Effective Date of the project and will include several key members. The PIU will be responsible for channeling resources to the PMTs to strengthen them as required. The PMTs will provide technical support to the PIU for the activities relevant to their respective companies.



*Figure 1 Proposed project implementation arrangements*

The establishment of a **Committee on “Just Transition”** is foreseen, appointed by the Council of Ministers of Bosnia and Herzegovina, in close cooperation with the two entities and Brcko Distrikt of Bosnia and Herzegovina..

In addition, the project will support an annual **Forum on Just Transition** to promote and exchange knowledge and experience, and discuss issues related to Just Transition. The Ministry of Foreign Trade and Economic Relations (MOFTER) will lead implementation of these activities. The project will support costs related to the Secretariat function of the Committee and the annual Forum. These costs will be financed by the additional grant that is still to be identified and secured.

An **Inter-Sectoral Ministerial Committee – Federation of BiH Steering Committee (SC)** will be established, consisting of the Prime Minister and Ministers of relevant Ministries. The committee

will: (i) coordinate with vertical and horizontal levels of governments the activities related to development of Just Transition projects in the Federation of Bosnia and Herzegovina; (ii) provide maximum contribution and invest efforts to meet joint objectives, needs and directions by proposing activities, which fall under its responsibility, towards Just Transition projects development in the Federation of Bosnia and Herzegovina ; (iii) follow up preparation and development of energy sector just transition strategic documents in the Federation of Bosnia and Herzegovina; (iv) provide contribution to activities under FMERI Minister’s actual responsibilities related to preparation and closure of mines in the Federation of Bosnia and Herzegovina; and (v) by its activities, contribute to mobilization of financial resources necessary for energy sector just transition in Bosnia and Herzegovina.

A **Post-Closure Mine Monitoring Unit** will be established under the JP EPBiH with links to the Cantonal ministry to maintain and monitor closed coal mines to ensure public safety and environment.

**In-House Labor Transition Units (LTUs) in the mine’s HR departments will be established**, to provide coordinated support before layoffs, prepare workers for a labor transition ahead of layoffs, and to initiate coordination with municipality and local employment offices. **LTUs will be established in Banovići and Zenica mines**, complemented by a **focal point for EPBiH** at their headquarters. LTUs will provide information on rights, support programs, labor market information, along with non-technical skills training and career counseling. They will also identify workers eligible for additional project-funded redeployment measures, such as upskilling and outplacement to ease their transition.<sup>26</sup> Approximately 100 workers from the Zenica mine will benefit from these additional redeployment measures.

**Table 8: Responsibilities of key actors/stakeholders in SEP Implementation**

STAKEHOLDER	RESPONSIBILITIES
PIU and Federal Ministry of Energy, Mining and Industry	<ul style="list-style-type: none"> <li>• Planning, implementation and monitoring of SEP activities;</li> <li>• Leading and coordinating stakeholder engagement activities;</li> <li>• Coordination/supervision of contractors on SEP activities;</li> <li>• Collecting stakeholders’ feedback through meetings, workshops, satisfaction surveys;</li> <li>• Managing CGRC, collecting grievances from LGRC, management and resolution of grievances; communication of grievances regularly through monitoring reports;</li> <li>• Building capacity of implementing partners – Local Governments on GRM and ESF stakeholder engagement standard and its implications;</li> <li>• Managing the project GRM database and submission of quarterly reports on the substance and quantity of grievances;</li> <li>• Supervision/monitoring of sub-projects and engaging with stakeholders.</li> </ul>

<sup>26</sup> These services can include (i) intensive individual career counselling, (ii) outplacement services, (iii) retraining and upskilling based on labor demand or, (iv) entrepreneurship training, based on needs. In addition, depending on an ongoing survey to assess workers’ preferences for alternative employment, this may include the option of providing mobility grants to incentivize individuals to relocate to regions with higher demand for the worker’s labor.

Local Governments	<ul style="list-style-type: none"> <li>Assisting PIU in organizing stakeholder engagement activities at the local level during land use change and construction works;</li> <li>Coordinate with the PIU on the outreach activities;</li> <li>Manage the LGRC, collect and send grievances to the CGRC;</li> <li>Disclosure of all documents, distribution of outreach material as needed;</li> <li>Facilitate the organization of stakeholder workshops to present project progress and collect feedback about project services.</li> </ul>
Line departments in LGs	<ul style="list-style-type: none"> <li>Update spatial plans and issue permits (as required);</li> <li>Respond to E&amp;S risk management requests;</li> <li>Administers land use change process.</li> </ul>
Mines Banovici/ Zenica/ Kreka // EPBiH	<ul style="list-style-type: none"> <li>Support stakeholder identification and inclusion;</li> <li>Coordinate with the PIU, provide support and participate in stakeholder engagement;</li> <li>Official correspondence with authorities;</li> <li>Discloses all documents, distributes outreach material as needed;</li> <li>Monitoring and identification of the needs and expectations of the local community, evaluation of needs and expectations and giving suggestions on how to meet reasonable expectations and needs;</li> <li>– Consultations during the land use change process;</li> <li>Establish an In-House Labor Transition Unit and in-house support for workers;</li> <li>Develop Mine Closure Plans;</li> <li>Lead and supervise the reclamation and repurposing activities;</li> <li>Recording and management of grievances related to land acquisition / resettlement / retrenchment;</li> <li>Preparation of project presentations and their updating;</li> <li>Coordination/supervision of contractors on SEP activities;</li> <li>Comment on the findings of studies;</li> <li>Facilitate timely exchange of information and decision-making processes.</li> </ul>
Other stakeholders	<ul style="list-style-type: none"> <li>Participate in the implementation of SEP activities;</li> <li>Monitor/ensure Project’s compliance with the laws of FBiH;</li> <li>Lodge their grievances using the GRM defined in the SEP;</li> <li>Help the Project to define mitigation measures.</li> </ul>

## 6.2 Planned budget

PIU 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 budget items:

- (i) Staff salaries (Social specialist) and related expenses (e.g. travel costs);
- (ii) Organization of events (meetings, trainings, workshops);
- (iii) Conducting surveys (citizens’ satisfactory surveys, sample-based grant beneficiary surveys);
- (iv) Printed outreach materials and project documents (brochures, leaflets, posters, manuals, etc.);
- (v) Grievance Redress Mechanism (training on GRM, establishment of local admission points, GRM communication materials);
- (vi) Other expenses.

A tentative budget for implementing the SEP over five years is presented in Table 9. PIU will review this plan every six months to determine if any changes to stakeholder classification or engagement are required. If so, the plan will be updated, and a new revision distributed. The budget will be revised accordingly.

**Table 9: Stakeholder Engagement Plan - Estimated Budget (5 years)**

Stakeholder engagement activities	Quantity	Unit cost (USD)	Total cost (USD)
1. Staff salaries and related expenses			
<i>Environmental and Social Specialists</i>	6	30,000	180,000
<i>Travel expense for staff</i>	1	10,000	10,000
2. Events			
<i>Public meetings</i>	15	300	4,500
<i>Other meetings</i>	10	300	3,000
3. Communication campaigns			
<i>Communication material (posters, flyers)</i>	1	1,500	1,500
<i>Media awareness raising campaign for grant program</i>	1	15,000	15,000
4. Trainings			
<i>Training for PIU and PMT staff</i>	1	500	500
<i>Training for contractors' staff</i>	4	500	2,000
5. Surveys			
<i>Grant beneficiary survey</i>	4	1,500	6,000
6. GM			
<i>Training of GM committees</i>	1	500	500
<i>GM leaflets</i>	1	1,500	1,500
<b>TOTAL</b>			<b>224,500</b>

## 7 GRIEVANCE MECHANISM

Grievance includes complaints and suggestions on project implementation. Key objective of grievance mechanism is to ensure efficient manner to address grievances. The WB expects each project to establish such a mechanism in line with ESS 10, at early stage of project development in order to be able to address specific issues in adequate and timely fashion.



The Project will help improve the existing institutional grievance mechanisms to ensure all grievances are recorded and monitored, with the aim to increase transparency and accountability, as well as to reduce risk of Project's adverse environmental and social impact.

A Project level GRM will consist of a Central Grievance Redress Committee (CGRC) established and administered by the PIU and sub-project specific Local Grievance Redress Committees (LGRC) (collectively referred to as GRM) established and administered by the Local Governments. The PIU will ensure that the involved Local Governments dedicate one officer to the task of admission of grievances (local municipal officer).

The CGRC shall be effective immediately after effectiveness of the Project, in order to manage and appropriately answer complaints during its different phases while the LGRC shall be effective upon decision on each new sub-project has been taken. The CGRC will be responsible for: collecting data from LGRC serving as local admission points on the number, substance and status of complaints and uploading them into the project database. Representatives of CGRC and LGRC will exchange all information on received complaints, records, and possibly other important information on sub-projects once a week.

To ensure GRM access, potential beneficiaries, communities and other stakeholders may submit grievances through channels as outlined below. The GRM will provide the opportunity for stakeholders to receive continued feedback on the sub-projects and also to provide resolution of their individual grievances during implementation. Therefore, the GRM shall serve as both Project level information center and grievance mechanism, available to those affected by implementation of all Project sub-components and is 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 use change and resettlement;
- Stakeholders - people with interest in the project; and
- Residents/communities interested in and/or affected by project activities.

However, the grievance mechanism for project workers required under ESS 2 will be provided separately with details provided in the Labor Management Procedure.

This GRM will also enable submission of grievances related to SEA/SH. The person engaged to administer these types of grievances should have specific experience and undergo training to be able to respond to these issues.

PIU and the Local Governments respectively are responsible 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. Information on the GRM will be available:

- on the websites of the PIU;

- on the notice boards and websites of Local Governments;
- through social media campaigns;
- through leaflet on GRM process.

Specific email addresses, phone numbers, all complaint channels, etc. will be provided upon adoption of this SEP and establishment of the GRM.

Feedback and complaints received through GM will be aggregated and included in regular quarterly reports. During project implementation, the SEP can be updated based on the identification of new stakeholders and/or the need for different forms of engagement of stakeholders.

## 7.1 Raising Grievance

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GRM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. All grievances can be filled anonymously. The access points and details on local entry points shall be publicized and shall be part of the awareness building once locations of the sub-projects are known. A sample grievance form is provided in **Annex 1** of this SEP.

## 7.2 Grievances Administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the GRM shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 3 days from logging it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The GRM will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and grievant be informed about the final decision not later than 30 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures, as made available under the FBiH legal framework. Logging a grievance with the GRM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by the BiH legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within 3 days from logging, the GRM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the PIU website.

The GRM shall keep a grievance register log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. However, the personal data of each grievant shall be protected under the Law on Personal Data Protection. Each grievance will be recorded in the register with the following information at minimum:

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

To avoid multiple Grievances by the same person on the same subject, simply because different admission channels exist, the LGRC and the CGRC shall weekly exchange information on grievances received and compare the Grievance logs. The grievance register log at the level of the LGRC will contain notes on all submissions received through the local admission channel. The centralized log at the level of the CGRC will contain notes on potentially duplicated submissions. Multiple submissions, on same events, by same grievant shall be resolved by one decision, which will be stated and the grievant appropriately informed.

In case a grievance cannot be resolved in manner satisfactory to the complainant he/she has the right for an appeal. In such cases the resolution of the grievance will be reviewed by a commission at the level of PIU/FMERI. This will serve as second tier grievance level. The commission will consist of three appointed members that are not directly involved in Project implementation. The commission will acknowledge the receipt of the appeal within 3 days and issue the final decision within 5 days of the receipt of the appeal. The decision of the commission will entail a detailed explanation of the grievance resolution process as well as the explanation of the final decision and guidance on how to proceed if the outcome is still not satisfactory for the complainant.

### **7.3 Grievance and Beneficiary Feedback Reporting**

The role of the GRM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep the Central grievance log administered by the PIU. In order to allow full knowledge of this tool and its results, quarterly updates from the GRM shall be available on the websites of the PIU/FMERI. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

### **7.4 Grievance Log**

PIU will maintain centralized grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type,
- Category,

- Deadline for resolving the appeal, and
- Agreed action plan.

Each complaint should be assigned with an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

- Name of the grievant, location and details of the grievance,
- Date of submission,
- Date when the Grievance Log was uploaded onto the project database,
- Details of corrective action proposed,
- Date when the proposed corrective action was sent to the complainant (if appropriate),
- Date when the grievance was closed out,
- Date when the response was sent to the grievant.

### 7.5 Grievance Admission Channels

Any grievance can be brought to the attention of the GRM by filling the grievance form in hard copy or on-line, or in any other format as chosen by the grievant. The sample grievance form is provided in **Annex 1**. Any type of grievance can be submitted by mail, fax, phone, e-mail or in person using the below access details:

Attention: PIU, Grievance Mechanism Address: Str.  
\_\_\_\_\_, Sarajevo 71000

Phone:

Email:

This avenue will be used until the above GRM are established. Approaches to the details of each LGRC will be known at later stages, and distributed. Information on these details will be part of the Engagement Strategy and will be published according to the information disclosure procedure as provided in this SEP.

### 7.6 Monitoring and Reporting on Grievances

The CGRC will be responsible for:

- Collecting, summarizing and analyzing data from LGRC serving as local admission points on the number, substance and status of complaints and uploading them into the single regional database;
- Maintaining the grievance logs on the complaints received at the regional and local level;
- Monitoring outstanding issues and proposing measures to resolve them;
- Disclosing quarterly reports on GRM mechanisms.

The quarterly monitoring reports to the WB shall be submitted through the PIU, which shall include a section related to GRM which provides updated information on the following:

- Status of GRM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any corrective measures taken.

## 7.7 WB Grievance Redress System

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 WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the WB's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the WB Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 7.8 Grievance in the national legislation

In addition to the GRM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.), some of which are listed in this section.

The FBiH Law on Administrative Procedure regulates how public administrative bodies in BiH decide on the rights, obligations or legal interests of citizens, legal entities, or other parties. Regulations on public administration in BiH, prescribe the obligation of administrative bodies to resolve requests received within prescribed deadlines at all levels of government. Governmental bodies are obliged to **consider and respond to complaints** and proposals submitted by all natural and legal persons, including complaints about the work and the work and attitude of employees. These laws and regulations exist both at the level of the State of BiH and in its Entities. In the administrations of BiH (Law on administration<sup>27</sup>), the complaint must be responded to within eight days from the day of receipt of the complaint, i.e a written response must be given on the measures taken in relation to a petition, proposal, or complaint. The administrative procedure is initiated by the competent authority ex officio or at the request of the party. The body responsible for resolving decides on the matter which is the subject of the proceedings. The party has the right to appeal

<sup>27</sup> Law on Administration ("Official Gazette of BiH", No 32/02, 102/09 and 72/17);

against the decision made in the first instance. An appeal against the decision shall be filed within 15 days from the day of delivery of the decision. Certain issues of procedure for a certain administrative area may only exceptionally, by a special law, be regulated differently than regulated by this law, if it is necessary for different treatment in these matters, provided that they may not be contrary to the principles of this law.

Article 76 of the **Law on Organization of Administration Bodies in FBiH**<sup>28</sup> stipulates the right of citizens to submit petitions and complaints to the head of the administrative body, and in the municipality - the municipal mayor, that is, in the city - the mayor. They can be submitted in the case if civil servants in administrative bodies do not resolve citizens' requests within the prescribed time limits, or from citizens they are looking for unnecessary and redundant evidence, or they are looking for evidence that they must obtain by official duty, or if in any other way they delay the resolution of the request citizens, or prevent have the right to with such behavior. Actions like that represent a serious breach of official duty.

The head of the administrative body is obliged to investigate the petition or complaint immediately, and no later than within five days from the date of receipt of the petition or complaint, and if she/he finds that it is founded, she/he is obliged to take measures provided for by law (initiate disciplinary proceedings or take other measures) against the official whose work the petition or complaint relates to, and at the same time submit a written response to the person submitting the petition or complaint on the measures taken. Citizens may also contact the **administrative inspection**.

The **Board for Appeals** was established in the FBiH, based on the FBiH Law on Civil Service. The Board decides on appeals sent from: federal civil service bodies; civil service bodies of municipalities, cities and cantons (Herzegovina-Neretva, Central Bosnia, Zenica-doboj, Sarajevo, Una-Sana, Tuzla, Herceg-Bosnia and Bosnia-Herzegovina). The Board is responsible for deciding on all appeals filed against the decisions of the heads of civil service bodies, appeals filed against the decisions of the disciplinary commissions and on appeals filed against the decisions of the director of the FBiH Civil Service Agency. Appeal cases are formed on the occasion of an appeal against a first-instance act that decided on employment rights in the field of admission to the civil service, assignment to a workplace, transfer, promotion, performance evaluations, salaries and benefits, suspension, disciplinary responsibility, termination of civil service, as and other rights from the employment relationship of civil servants and state employees.

In addition, Article 46 of the **Law on Principles of Local Self-Government in the Federation of BiH**<sup>29</sup> stipulates that bodies of local units of self-government shall have the duty to enable citizens and legal entities to submit letters and objections to their work, the work of their institutions and agencies, and improper conduct of employees in those agencies in communication with citizens who seek to achieve their rights and interests or fulfill their civic duty. Bodies of local units of self-government are obliged to provide citizens and legal entities with a reply to their letters and objections within 30 days from the date of letter or objection.

**The Institution of the Human Rights Ombudsman in BiH** is an independent institution that deals

<sup>28</sup> "Official Gazette of the FBiH", no 35/05).

<sup>29</sup> "Official Gazette of the FBiH", no 49/06).

with the protection of the rights of natural and legal persons, and in accordance with the Constitution of Bosnia and Herzegovina and the international agreements contained in the appendix to the Constitution. It has a broad mandate and may be addressed by each natural person or institution that has legitimate interests. The Institution of the Ombudsman is also the central institution for protection against discrimination, and that it can act towards all natural and legal persons, according to the **BiH Law on Prohibition of Discrimination**, and the enforcement of the **BiH Law on Freedom of Access to Information**. Any natural or legal person who has a legitimate interest, regardless of citizenship, race, gender, religious or national affiliation, can apply to the Human Rights Ombudsman of Bosnia and Herzegovina. A complaint addressed to the Institution will not cause any criminal, disciplinary or any other sanctions for its applicant.

Complaints may be filed in writing, by mail, fax, or email, or through personal contact. The Head Office is in Banja Luka, with Regional Offices in Sarajevo, Mostar, and District of Brcko. In addition, there is Field Office in Livno.

In case The Ombudsman determines that a violation of rights, recommendations to the relevant organs/institutions of will be issued with directions for how to restore the violated rights or how to remedy poor administrative performance. The Ombudsman institution assists the citizen on how to utilize the most adequate legal remedies or advise them which institution to address.

The Ombudsman has authority to review all official documents related to administrative files and request the cooperation of an official authorized to resolve administrative matters in administrative proceedings and other officials especially in obtaining the necessary information, documents and files related to the administrative matter which is the subject of the administrative procedure, and it can request annulment of the decision. The Ombudsman institution in 2019 registered more than 3 000 cases of which around 80% relates to violations of civil and political rights, rights in the judiciary and administration and economic, social, and cultural rights.<sup>30</sup> The Ombudsman can issue authoritative, but legally non-binding recommendations – and it is not unusual for the relevant authorities to ignore the recommendations from the Ombudsman.<sup>31</sup>

The Ombudsman mandate has several functional elements, which include not only the handling of complaints and individual procedures initiated ex officio, but also monitoring and preventive action. It has established a mechanism for monitoring the situation in this area in such a way that it monitors the execution of the obligations of the public body established by the BiH Law of on Freedom of Access to Information, and acts on the complaints sent to it by the parties.

## 8 MONITORING AND REPORTING

PIU will document, and communicate the progress and results of the Project, including monitoring of the SEP. The PIU will be responsible for overall compilation of progress and results.

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<sup>30</sup> [https://ombudsmen.gov.ba/documents/obudsmen\\_doc2020121715362648eng.pdf](https://ombudsmen.gov.ba/documents/obudsmen_doc2020121715362648eng.pdf)

<sup>31</sup> In 2019, the Ombudsman issued 304 recommendations in 374 cases 2019, of which 105 were fully implemented, nine partially implemented, but as many as 124 recommendations received no response from the responsible authority (ibid).

## 8.1 Monitoring Reports

Monitoring reports documenting the environmental and social performance of the Project will be prepared by the PIU and submitted to the World Bank quarterly as part of the overall progress reporting requirements. These reports will include a section regarding stakeholder engagement and grievance management. Table below proposes a comprehensive set of indicators related to SEP performance at this stage. The achievement of indicators shall rely on information from the Stakeholder Engagement Log and the Grievance Log.



**Table 9: SEP Indicators to be documented in Progress Reports**

ENGAGEMENT WITH APs
Number and location of formal meetings with APs
Number and location of informal meetings with APs
Number and location of community awareness raising or training meetings
Number of men and women that attended each of the meetings above
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project environmental and social management system
ENGAGEMENT WITH OTHER STAKEHOLDERS
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, LGs, local CSOs/NGOs)
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
GRIEVANCE RESOLUTION MECHANISM
Number of grievances received, in total and at the local level, at PIU headquarters, 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 CGRC and LGRC meetings, and outputs of these meetings
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods

*Note: Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the quarterly report. They will summarize the view of attendees and distinguish between comments raised by men and women.*

The reporting on environmental and social activities conducted by PIU and the Supervision and ESMP and RAP Monitoring will be the responsibility of the Environmental and Social Specialists during the construction phase, and will be undertaken in accordance with the requirements of the ESMP and RAP.

## **8.2 Involvement of Stakeholders in Monitoring Activities**

The Project provides several opportunities to stakeholders, especially project affected parties to monitor certain aspects of Project performance and provide feedback. LGRC at the level of each affected Local Government will allow APs to submit grievances and other types of feedback. Citizen/AP surveys at the project mid-point and end stages will also allow APs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with PIU staff, will allow APs and other local stakeholders to be heard and engaged.

## **8.3 Reporting Back to Stakeholder Groups**

PIU through the Social specialist will report back to APs and other stakeholder groups, primarily through public meetings in project affected Local Governments and/or villages. Minutes of meetings will be shared during subsequent public meetings. 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. Summaries of stakeholder engagement activities will be publicly disclosed on quarterly basis on the websites of PIU and Local Governments. A template for documenting stakeholder engagement activities (Stakeholder Engagement Log) is provided in Annex 2.

## ANNEX 1: PROJECT GRIEVANCE FORM

Reference number:	
Full name ( <i>optional</i> )	
Contact information ( <i>optional</i> )  <i>Please mark how you wish to be contacted (mail, telephone, e-mail).</i>	<input type="checkbox"/> By post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By _____ telephone: _____ <input type="checkbox"/> By _____ e-mail: _____ _____ <input type="checkbox"/> On website
Preferred language of communication	<input type="checkbox"/> Bosnian/Croatian/Serbian <input type="checkbox"/> English (if possible) <input type="checkbox"/> Other _____
Description of incident for grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of incident / grievance	
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen?	

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

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

Please return this form to:

	Attention: PIU
	Address:
	Phone:
	Fax:
	E-mail:
	Web:

**ANNEX 2: STAKEHOLDER ENGAGEMENT LOG**

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