

NERETVICA RIVER SMALL HYDROPOWER PLANTS PROJECT (FBIH)

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STAKEHOLDER ENGAGEMENT PLAN

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1. INTRODUCTION

1.1 Description and Context of the Project

JP Elektroprivreda Bosne i Hercegovine d.d. Sarajevo (“EPBiH” or the “Company”), a public utility responsible for generation, distribution and sale of electricity in Bosnia and Herzegovina, is considering the options to construct and operate 15 small hydropower plants (“sHPP”) on the Neretvica River in Konjic Municipality (the “Project”). The combined installed capacity of these run-of-river plants will be approximately 26MW.

Construction will be organised in three phases, each including the construction of four to six plants, as outlined in Table 1 below.

Table 1: Construction phases and estimated start/end dates

Construction phase	sHPP to be constructed	Estimated start date/end date
Phase Ia	Srijanski Most and Gorovnik Usce	April/May 2018 - April/May 2019
Phase Ib	Crna Rijeka and Gorovnik	March/April 2019 - March/April 2020
Phase II	Podhum 1, Podhum 2, Donji Obalj, Pozelevka and Mala Neretvica – usce	March/April 2020 - March/April 2021
Phase III	Obascica, Duboki Potok 2, Ruste, Plavuzi, Prolaz, Duboki Potok 1	March/April 2021 - March/April 2022

The estimated time for construction of each plant is one year and the operational life is 50 years.

It is anticipated that the Project will include the construction of:

- 15 Tyrolean type water-intake structures with concrete weirs ranging from 0.9 to 3.1m height
- 34km pipelines for transporting the water from the intake structures to the powerhouses with diameters ranging from 500 to 1800mm
- 15 powerhouses made up of either two Francis type turbines or one Pelton type turbine, with capacities ranging from 0.4 to 3.8MW
- approximately 5km of new access roads and reconstruction of 10km of existing local roads
- approximately 10km of underground cables for connecting the Phase I plants to the existing substation in Buturovic Polje and approximately 15km of underground cables for connecting the Phase II and III plants to the new on-site substation
- new on-site 110/35kV substation which is envisaged to be built as part of construction Phases II and III for connection of Phase II and III plants to the grid (location yet to be identified)
- new associated 110kV OHL, approximately 12km long, from the new on-site substation to the existing 110kV OHL Jablanica-Sarajevo, to be built as part of construction of phases II and III
- minor rehabilitation works at three existing sub-stations (Buturovic Polje, Jablanica and Ostrozac)
- spoil and borrow pits (sites yet to be identified)

A scoping report has been developed and is disclosed in parallel with this SEP. Additional information regarding the potential project configuration is included in the scoping report.

1.2 Objective and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (“SEP”) was developed by EPBiH in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to express their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the project, particularly prior to and during the construction and operation of the SHPP and to carry out stakeholder engagement in line with national laws and international best practice.

This SEP will be updated as necessary to reflect Project progress and to ensure that the public is informed on potential future environmental and social impacts associated with the Project (during the scoping stage) and the evaluated impacts (during the development of the full Environmental and Social Impact Assessment).

2. REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

2.1 Overview

As part of EPBiH's ongoing commitment to good corporate governance and its Project stakeholders, this SEP is designed to meet international best practice such as the EBRD Performance Requirements (PR) and the laws of the FBiH. BiH has signed and ratified the United Nations Economic Commission for Europe's Aarhus Convention, which relates to access to information, public participation in decision-making, and public access to justice in relation to the environment and is in line with EBRD's PRs. Therefore, the laws of FBiH are broadly aligned with EBRD's PRs.

Furthermore, EPBiH's Corporate Governance Code stipulates that the Company ensures access to reliable, current and consistent information in a regular, timely and uniform manner for all its stakeholders, and that information is publicly disclosed on its website and/or daily newspapers and other media.

2.2 Local Legislation Requirements

As a public enterprise, EPBiH is required to establish communication with stakeholders in accordance with the *Law on Free Access to Information in FBiH*¹ and EPBiH's internal *Decision on Free Access to Information Possessed by EPBiH*² – i.e. to provide access to information to all stakeholders, including every natural person or legal entity. In the framework of its capabilities, it is also obliged to undertake all necessary measures to provide assistance to natural persons or legal entities seeking to exercise their rights.

As a public enterprise, EPBiH is required, in accordance with the *Law on Public Companies in FBiH*³, to operate on the principle of freedom of access to information, and make publicly available on its website all information regarding its work, organisation and financial management.

In addition, the *Law on Environmental Protection of FBiH*⁴ stipulates that every person and every organisation must have adequate access to information regarding the environment which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision making process. This Law also regulates the Environmental Impact Assessment (EIA) procedure and prescribes that public hearings must be organised for projects that require an Environmental Impact Assessment. The EIA is made available to the public and a copy sent to relevant authorities and other interested parties, allowing 30 days for submitting comments, after which a public hearing is organised, and the public invited via printed (or electronic) media/radio/TV, at least 15 days in advance. The Environmental Permit is issued after the EIA is revised and all the relevant comments received from interested parties are taken into consideration⁵.

2.3 International Best Practice and the EBRD Policies on Stakeholder Engagement

EPBiH has committed to follow the provisions of EBRD's Environmental and Social Policy (2014)⁶, i.e. Performance Requirement 10: Information Disclosure and Stakeholder Engagement, which

¹ Official Gazette of FBiH, No. 32/01

² Adopted in 2011, and amended in 2012

³ Official Gazette of BiH, No. 81/08

⁴ Official Gazette of FBiH, No. 33/03 and 38/09

⁵ For this Project, the EIAs for all 15 sHPP were developed in 2009, and all the environmental permits were issued successively in the period 2010-2013. Since these permits are valid for only five years, some of the permits have expired. The permits for the first four sHPP were extended in October 2016.

⁶ Available at: <http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

have been taken into account in the preparation of this SEP as an example of International Best Practice. This document covers information disclosure, consultation and grievance redress, as explained in more detail below.

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. EBRD's **PR 10: Information Disclosure and Stakeholder Engagement** the importance of an open and transparent engagement between the project, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EBRD's Environmental and Social Policy contains specific disclosure and consultation requirements for "Category A" projects (i.e., projects which could result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified). The ESIA process includes a scoping stage to identify the potential future environmental and social impacts associated with the project. The ESIA process will also include a public disclosure and consultation process as specified in PR 10. The project will engage in a scoping process with interested parties and identified stakeholders at an early stage of the ESIA process to ensure identification of key issues to be assessed as part of the ESIA. As part of the scoping process, stakeholders should be able to provide comments and recommendations on a draft SEP and other scoping documents. Also, where an Environmental and Social Action Plan (ESAP) has been agreed between EBRD and the project, the project must disclose the ESAP to the affected parties. The project must keep the ESIA in the public domain throughout the life of the project, but it may be amended, from time to time, with additional information, or archived following project completion, as long as it is available on request in a timely manner.

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

3. PREVIOUS STAKEHOLDER ENGAGEMENT

Friendly Environment Program

A Friendly Environment Program for the purpose of construction of 15 sHPP in Neretvica was implemented by EPBiH as part of its social responsibility activities. Program activities were publicized with the aim of informing the public about the plans for construction of sHPP and the effects to be achieved by such construction. A total of 1,200,000 KM (approx. 615,000 EUR) has been allocated for various projects, selected by the Konjic Municipality and the Local Communities⁷ in the Project area as follows:

- Projects of reconstruction, adaptation and/or construction of infrastructure facilities for Local Community Jasenik and Local Community Neretvica including adaptation of four schools, construction of a local water supply network, and reconstruction of a stadium
- Road infrastructure for Local Community Jasenik and Local Community Neretvica including asphaltting and concreting of local roads

The Program was completed in December 2016.

Public hearing for the environmental permits

During the environmental permitting process in 2010, the EIAs prepared for all 15 sHPP were made available to the public in hard copies in the premises of the Federal Ministry of Environment and Tourism, EPBiH, Local Communities, Ecological Society "Zeleni Neretva", and online on the web page of FMoET. A public hearing was held in the premises of the Primary school "Parsovići" in Parsovići - Buturović polje in April, 2010.

The public was invited to the public hearing through the local radio station Konjic, daily newspapers, and via notice boards at Local Communities.

The following stakeholders attended the public hearing: (i) representatives of Local Communities Jasenik and Buturović Polje, (ii) Ecological non-governmental organisation "Zeleni Neretva", (iii) Municipality of Konjic, (iv) Ministry of Trade, Tourism and Environmental Protection of Herzegovina-Neretva Canton, (v) Agency for Watershed of the Adriatic Sea, (v) Organisation of Sports Fishermen "Konjic", (vi) local population. In accordance with the Law on Environment FBiH, 30 days were left for providing comments and suggestions on the EIAs.

Tentative stakeholder meetings

Tentative stakeholder meetings were held for the purposes of a supplementary Environmental and Social (E&S) analysis for the EBRD in October and November, 2016. In addition to all the stakeholders previously consulted during the environmental permitting process, tentative stakeholder meetings included newly identified stakeholders (as a result of the snow-ball method⁸).

⁷ Local Communities are a form of community self-government, through which citizens decide on issues of significance for living and working on the territory of Local Communities.

⁸ Snowball method of sampling is an approach for locating information-rich key informants, used by researchers to identify potential subjects in studies where subjects are hard to locate.

4. STAKEHOLDER ENGAGEMENT PROGRAM

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs. The Company and the Municipality recognise that meaningful and timely engagement with Local Communities, Project Affected People (PAPs)⁹ and other stakeholders can enable the success of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended local benefits.

Project stakeholders have been identified in order to address the different consultation requirements. Stakeholders include persons or groups that are:

- directly and/or indirectly affected by the Project (including land owners that may be subject to land acquisition activities, the settlements proximal to the Project and the users of the Neretvica River who live remotely such as hunting or fishing associations);
- have certain interests in the Project and its activities;
- have the ability to affect the Project itself and its final outcome.

However, any stakeholders that are not identified including vulnerable people may directly contact EPBiH to make themselves and their needs known to EPBiH to facilitate the effective implementation of the SEP (see contact information in Chapter 5).

4.1 Responsibility for SEP Implementation

A Project Implementation Unit (PIU) has been established for the Project, consisting of representatives of EPBiH, responsible for the implementation of the SEP during the entire Project cycle, and in charge of communicating with the communities.

4.2 Available Communication Tools

EPBiH has developed a system for regular and direct communication with stakeholders, including the following channels of communication and information disclosure:

- Telephone, mail, fax or e-mail inquiries;
- Official website of EPBiH (<http://www.elektroprivreda.ba>);
- Disclosure of information through Local Community Offices (LCOs);
- Public announcements communicated to the media (local radio and television stations, daily newspapers).

4.3 Planned Information and Communication Arrangements

EPBiH will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project. Details on documents and information to be disclosed and timing of public consultations (planned meetings) are provided below and summarized in Table 2.

Documents and information to be disclosed

EPBiH intends to disclose the following documentation and information regarding the Project:

- This **Stakeholder Engagement Plan** (SEP);

⁹ i.e. land owners who will be directly affected by land acquisition

- **Project Grievance Form** (see *Appendix 1: PROJECT GRIEVANCE FORM*), **Public Grievance Leaflet** (see *Appendix 2*) and **Information Request Form** (see *Appendix 3*);
- **Environmental and Social Scoping Report** (which will be made public on the EPBiH website, and the public will be able to provide comments and recommendations to the report);
- **Draft Environmental and Social Impact Assessment (ESIA)**;
- **Final ESIA**;
- **Non-technical Summary** of the ESIA;
- Any **land acquisition planning documents**;
- **Information on the risks and disturbances associated with the construction and operation**, and **updates regarding the implementation progress of the Project**;
- **Environmental parameters** (environmental data monitored by hydropower schemes, such as inflow, outflow and reservoir level data, meteorological parameters measured at the sites, physical and chemical quality parameters monitored in the operator);
- **Summaries of Monitoring Reports** and **summaries of Annual Environmental and Social Reports** (described in Chapter 7).

These documents and information will remain in the public domain for the entire duration of the Project cycle.

Project Poster

The PIU will prepare and update as necessary an informative Project Poster which will include, at a minimum, brief information on the Project, the period of Project implementation, a simple illustration of Project locations and the contact persons.

Planned meetings

EPBiH will schedule and hold meetings with the representatives of different stakeholder groups as detailed below. Stakeholders will be informed about the exact date, time and venue where a meeting will be held at least seven days in advance (but preferably 14 days), through disclosure through the websites and bulletin boards of EPBiH and Konjic Municipality, as well as local media.

- **Scoping report disclosure and consultation:** the draft scoping report will be disclosed on the webpage of EPBiH and the Municipality of Konjic, and will be available in hard copies in the premises of the Local Community Offices. A scoping meeting will be organised (not earlier than two weeks after disclosure of document) to present the draft document to interested parties and identified stakeholders, who will be provided with the opportunity to submit comments and recommendations during the meeting or subsequently in writing.
- **Full ESIA consultation:** a series of public meetings to present and discuss the draft ESIA will be organised. Stakeholders will be provided with the opportunity to submit comments and recommendations to the draft ESIA both in writing and at the public meeting. Any such comments or recommendations will be considered and included in the final ESIA. The draft ESIA will be publicly disclosed on the websites of EBRD and EPBiH during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors.
- **Public consultation meetings** will be held on a regular basis, at least every six months, during Project preparation and implementation, i.e. prior to and during the construction works.

At least one public meeting will be organised prior to initiation of construction works. Such meetings will be aimed at providing regular gatherings of all stakeholders and will be open for all interested and affected parties.

During these meetings, the participants will be able to present their opinions and remarks with regards to the Project, as well as to suggest possible solutions of the issues raised, which will be documented and addressed appropriately in the Project Implementation

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Monitoring Reports in regard to the received grievances and follow up action taken to be prepared by the PIU.

- **Local Community consultation meetings** are aimed at engaging communities potentially affected by the construction activities into the consultation process, and will be organised on a needs basis, e.g. if Local Community members do not attend public meetings in Local Communities “Jasenik” and “Neretvica”.
- **Individual consultation meetings** will be aimed at engaging individual stakeholder groups regarding specific issues, and will be organised on a needs basis. This type of meetings can be initiated by the Konjic Municipality, EPBiH or by any identified stakeholder groups/individuals.
- **Land owner meetings** will be organised according to the national legislation, and held in the premises of the Municipality of Konjic.

Table 2: Summary of Stakeholder Engagement Activities

	Activity	Timing/further detail	Responsibility
1)	<p>Publicize available Project documents on EPBiH's website (www.elektroprivreda.ba), including:</p> <ul style="list-style-type: none"> • SEP • Project Grievance Form • Public Grievance Leaflet • Information Request Form • Environmental and Social Scoping Report • Draft Environmental and Social Impact Assessment (ESIA) • Final ESIA • Non-technical Summary of the ESIA • Any land acquisition planning documents <p>Deliver hard copies of documents to the Municipality of Konjic and to representatives of Local Community Offices for disclosure.</p>	<p>All available Project information and documents will be disclosed to the public as soon as available, but at least seven days in advance prior to the first public meeting, and at least 30 days prior to the start of construction works.</p> <p>The public will be invited to provide comments and recommendations on the Environmental and Social Scoping Report as well as the draft ESIA.</p>	PIU
2)	<p>Ensure the above listed Project documents are publicized on Konjic Municipality website (www.konjic.ba)</p>	Same as above	PIU Konjic Municipality
3)	<p>Prepare and keep all documents in hard copy in EPBiH premises at</p> <p>Public Company Elektroprivreda BiH Sarajevo Address: Vilsonovo Šetalište 15, 71 000 Sarajevo</p>	Same as above	PIU
4)	<p>Organise public consultation meetings (including consultation meetings on draft scoping report and draft ESIA)</p> <p>Encourage written proposals and comments</p> <p>Provide timely insight into documents for stakeholders before every meeting (at least 2 weeks)</p>	<p>Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least seven days in advance (but preferably 14 days), through disclosure through the websites and bulletin boards of EPBiH and Konjic Municipality, as well as local media</p>	PIU
5)	Organise Local Community consultation meetings	As needed or requested by LCOs	PIU
6)	Organise individual consultation meetings	As needed or requested by Konjic Municipality, EPBiH or any identified stakeholder groups/individuals	PIU
7)	Document all opinions, remarks and possible solutions with regards to the Project raised by stakeholders during consultation meetings, and address	Ongoing	PIU

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	Activity	Timing/further detail	Responsibility
	appropriately		
8)	Publicize information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via websites of EPBiH and Konjic Municipality and bulletin boards in LCOs	Two weeks prior to the commencement of construction works	PIU Konjic Municipality LCOs
9)	Publicize information about Project progress on EPBiH website, including: <ul style="list-style-type: none"> • Information on the risks and disturbances associated with the construction and operation, and updates regarding the implementation progress of the Project • Environmental parameters • Summaries of Monitoring Reports • Summaries of Annual Environmental and Social Reports 	Periodically	PIU
10)	Prepare and post Project Poster on EPBiH website	At the same time as publication of SEP	PIU
11)	Ensure Project Poster is posted on website and premises of Konjic Municipality, and delivered to LCOs "Jasenik" and "Neretvica" for posting on bulletin boards	Same as above	PIU Konjic Municipality LCOs

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Table 3: Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement requirements
<p>Project Affected People</p> <p>Land owners/users who will be directly affected by land acquisition</p>	<p>Land acquisition of private land plots will need to be carried out for needs of the Project, neither physical resettlement of households or businesses nor economic displacement are expected to occur.</p>	<p>Providing timely information on land acquisition activities</p> <p>Obtaining confirmation on issues reported in scoping report</p> <p>Keeping records on land plots subject to land acquisition, uses, title holders and agreements</p>	<ul style="list-style-type: none"> • Land owners will be individually contacted and informed about the impacts of the Project on their property • Delivering relevant documentation to Local Community Offices (LCOs) on whose territory land acquisition is planned (particularly land acquisition planning documents)
<p>Local residents and businesses in the vicinity of the Project area</p> <p>Local communities located in the proximity of the planned construction/reconstruction works which may experience access restrictions and/or disturbances</p>	<p>During construction works, communities located in the vicinity of the planned construction works may experience restricted access and disturbances related to increased noise due to machinery operation, increased dust, waste disposal, potential disruptions to water and electricity supply, etc.</p>	<p>Providing timely information on risks and disturbances associated with the construction period and the hydropower plant operation</p>	<ul style="list-style-type: none"> • The extent, timing and duration of planned construction works and any expected disruptions and inconveniences will be publicly disclosed through the websites of the EPBiH and Konjic Municipality, public bulletin boards in the premises of the EPBiH and the Municipality, as well as the bulletin boards of LCOs “Jasenik” and “Neretvica” • Posting the Project Poster in affected Local Communities and updating when necessary • Public consultation meetings, and LCO meetings as necessary
<p>Affected vulnerable groups</p> <p>People who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by Project impacts than others and who may be limited in their ability to claim or take advantage of project benefits, such as:</p> <ul style="list-style-type: none"> • children inhabiting the vicinity of the construction site or passing the construction sites on a daily basis • people with special needs 		<p>Proactively providing information and assistance in interpreting and understanding the provided information and documentation if needed.</p>	<ul style="list-style-type: none"> • Access to information for vulnerable groups will be facilitated by the PIU in cooperation with the Municipal Department for Social Affairs, as appropriate for each person/family according to their specific needs and/or situation • Posting the Project Poster in affected Local Communities and updating when necessary • Public consultation meetings, and individual meetings as necessary

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Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement requirements
<ul style="list-style-type: none"> • elderly people <p>During field visits, minorities or vulnerable groups by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status and disability were not identified.</p> <p>According to discussions with representatives of Local Community Offices and other stakeholders during the field visits, the majority of population in the nearby villages are elderly.</p>			
<p>Municipality and LCOs</p> <ul style="list-style-type: none"> • Municipality of Konjic • LCO Jasenjic • LCO Neretvica 	<p>Representing the interests of the Local Communities</p>	<p>Providing timely information on planned works, consultations regarding the prepared plans and documentation</p>	<ul style="list-style-type: none"> • Official correspondence • Public consultation meetings, and LCO consultation meetings as necessary • Posting the Project Poster in affected Local Communities
<p>Government authorities, relevant cantonal and federal ministries and public institutions, including:</p> <ul style="list-style-type: none"> • Federal Ministry of Environment and Tourism • Federal Ministry of Sports and Culture • Ministry of Trade, Tourism and Environmental Protection of Herzegovina-Neretva Canton • Ministry of Agriculture, Water and Forestry of Herzegovina-Neretva Canton • Ministry of Traffic and Communication of Herzegovina-Neretva Canton • Adriatic Water Area Agency 	<p>Issuing permits and opinions in accordance with local legislation</p>	<p>Consultations with relevant government authorities concerning the Project activities (environmental permitting, water and urban planning permits, etc.)</p>	<ul style="list-style-type: none"> • Regular contacts through internal communication channels • Public consultation meetings

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Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement requirements
Users of the water body/beneficiaries of space¹⁰: <ul style="list-style-type: none"> • Organisation of Sports Fishermen “Konjic” • Hunting Association “Neretvica” Buturović polje Konjic • Forest Enterprise “Prenj Konjic” 	Use of natural resources according to planning documents in the fields of fishing, hunting and forestry	Providing timely information, communication and consultations	<ul style="list-style-type: none"> • Disclosure through the websites of EPBiH and Konjic Municipality, and local media • Public consultation meetings, and individual consultation meetings as necessary
Interested local non-governmental organisations (NGOs) <ul style="list-style-type: none"> • NGO “Zeleni Neretva” Potentially interested international NGOs: <p>The list of potentially interested NGOs may also include regional or international groups such as Riverwatch, EuroNatur, World Wildlife Fund (WWF), Central and Eastern Europe Bankwatch Network, Regional Environmental Centre for Central and Eastern Europe (REC) – even though such organisations have not yet demonstrated a specific interest in this project, all shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation.</p>	Note: Any organisations interested in the Project can send their contact details to the PIU to be included in the <i>Table of Interested Organisations</i> in this SEP and notified directly about Project events.	Providing timely information, communication and consultations	<ul style="list-style-type: none"> • Disclosure through the websites of EPBiH and Konjic Municipality, and local media • Public consultation meetings, and individual consultation meetings as necessary • Posting the Project Poster in affected Local Communities
Employees and workers of EPBiH and the Employees’ Union <ul style="list-style-type: none"> • EPBiH representatives • Employees’ Union 	Stakeholders of high significance for the Project’s success who are directly or indirectly engaged in Project planning and implementation	Providing timely information about the planned Project activities	<ul style="list-style-type: none"> • EPBiH’s internal bulletin board • Trainings as necessary
Contractors or subcontractors for construction, monitoring and		Provision of Project code of conduct and work safety and	<ul style="list-style-type: none"> • Information through tender procedure and contracts • Communication via supervising engineers

¹⁰ As defined under local legislation: associations or organisations entitled to use and manage certain space based on an approval by the relevant government authorities.

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Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement requirements
supervision of works, and their employees		health regulations, environmental protection requirements	<ul style="list-style-type: none"> • Toolbox talks at construction sites on relevant occupational health and safety topics • Monthly reports on progress of works to be submitted by contractors during construction works • Trainings as necessary

5. GRIEVANCE MECHANISM

EPBiH (namely, its PIU) will establish a Grievance Registry, and will inform all stakeholders of the grievance mechanism by communicating the availability of this registry, its function, the contact persons and the procedures for submitting a complaint in the affected areas. The Project Grievance Form (*Appendix 1*) and the Public Grievance Leaflet (*Appendix 2*) will be disclosed on EPBiH's website.

Any comments or concerns can be brought to the attention of the PIU verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post, fax or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

All grievances will be recorded in the Grievance Registry and assigned a number, and acknowledged within seven calendar days (the flowchart for processing grievances is enclosed in *Appendix 4*). The Registry will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the registry with the following information:

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

If the grievance/complaint is vague and not clear enough, the PIU will assist and provide counsel in formulating/redrafting the submission, in order for the grievance/complaint to become clear, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project.

The PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 25 calendar days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

If the PIU is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

If the complainant is not satisfied with the implemented corrective and preventive action and/or a justification on why the corrective action is not required, the complaint will be directed to the second-instance Grievance Commission to be established ad hoc. The Commission will consist of:

- one representative of EPBiH (other than the person directly involved in resolving the grievance described in the previous steps),
- one representative of the Konjic Municipality,
- one representative of the relevant LCO.

The Commission will re-evaluate the previously carried out corrective and preventive action and/or the justification on why an action is not required, and reconsider alternatives to address the complaint in a satisfactory manner. The complainant will be informed about the proposed alternative actions and of the implementation of actions within 25 calendar days upon the acknowledgement of grievance by the Grievance Commission.

At all times, complainants may seek other legal remedies in accordance with the legal framework of FBiH, including formal judicial appeal.

A separate grievance mechanism is available for workers.

Contact information for enquiries and grievances:

Attention: Ms Nizama Koldžo-Kupusović, Project Implementation Unit

Public Company "Elektroprivreda BiH" Sarajevo

Address: Vilsonovo Šetalište 15, 71 000 Sarajevo, Bosnia and Herzegovina

Tel.: +387 33 75 1866

Fax: +387 33 75 1748

E-mail: mheneretvica@elektroprivreda.ba

6. FORMAL REQUEST FOR INFORMATION IN LINE WITH LOCAL LEGISLATION

In parallel to the above described mechanism for submitting grievances and enquiries, all interested and affected parties may submit also a formal request for information in line with the provisions of the *Law on Free Access to Information (LFAI) in FBiH* described in more detail in the previous chapters of this SEP.

In case the PIU receives a formal request for access to information, it will apply the provisions and procedures set out by the mentioned Law. The formal request is submitted in written form in one of the three official languages in FBiH. The request for access to information may be submitted personally (with the receipt seal, date and signature), by regular mail, fax and electronic mail.

In case the PIU does not have the information requested, and in case it does not have access to the information requested, it is required, within eight calendar days of receipt, to forward the request to the competent institution or legal entity, as well as notify the requester about the undertaken measure. Within 15 calendar days of receiving the request, the PIU is obliged to notify the requester whether he/she has been granted access to the requested information¹¹.

In case the PIU grants access to requested information completely or partially, it will notify the requester.

The official form for requesting access to information can be found in Appendix 3 to this SEP.

7. MONITORING AND REPORTING

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

- Place and time of carried out consultation meetings (including other types of engagement activities) with information on the number of participants and which bodies or villages they represent;
- Issues and concerns raised during consultation meetings and information on how the issues raised during the meetings were taken into consideration by the PIU, including the implemented corrective measures meant to address the grievances;
- Number and types of grievances raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism.

In addition, the PIU will submit Annual Environmental and Social Reports to EBRD summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. The PIU will be responsible for monitoring all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD.

¹¹In case of exceptions and the need to examine the confidential commercial information or information of public interest, the deadline may be prolonged, according to the LFAI. The requester must be notified of all actions and reasons for prolonging the deadline.

Appendix 1: Project Grievance Form

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

Signature: _____
Date: _____

Please return this form to:
Attention: Project Implementation Unit
Public Company «Elektroprivreda BiH» Sarajevo
Address: Vilsonovo Šetalište 15, 71 000 Sarajevo, Bosnia and Herzegovina
Tel.: +387 33 751 866
Fax: +387 33 751 033
E-mail: mheneretvica@elektroprivreda.ba

Appendix 2: Suggested Text for Public Grievance Leaflet

JP Elektroprivreda Bosne i Hercegovine d.d. Sarajevo (“EPBiH”) is striving to ensure that the construction and operation of the Neretvica River Small Hydropower Plants Project will not result in adverse impacts for those living near the Project site or for other potentially affected stakeholders. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that Project activities are negatively affecting them, their community or their local environment. Examples of grievances could include, but are not limited to:

- Mishandling of the land acquisition process;
- Increased noise, access issues or other nuisances during construction works;
- Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- Concerns about the environment;
- Negative impacts on downstream water quality;
- Practices that endanger the health, safety and security of employees working on the Project;
- Inadequate implementation of the Project’s Stakeholder Engagement Plan by EPBiH.

How can I submit a grievance?

Anyone can submit a grievance to EPBiH (contact information given below) without any costs incurred to the complainant, in the following ways:

- a. verbally (in person or by telephone)
- b. in writing by filling in the attached Project Grievance Form or in other form if preferred, and sending it to EPBiH (by personal delivery, post, fax or e-mail)

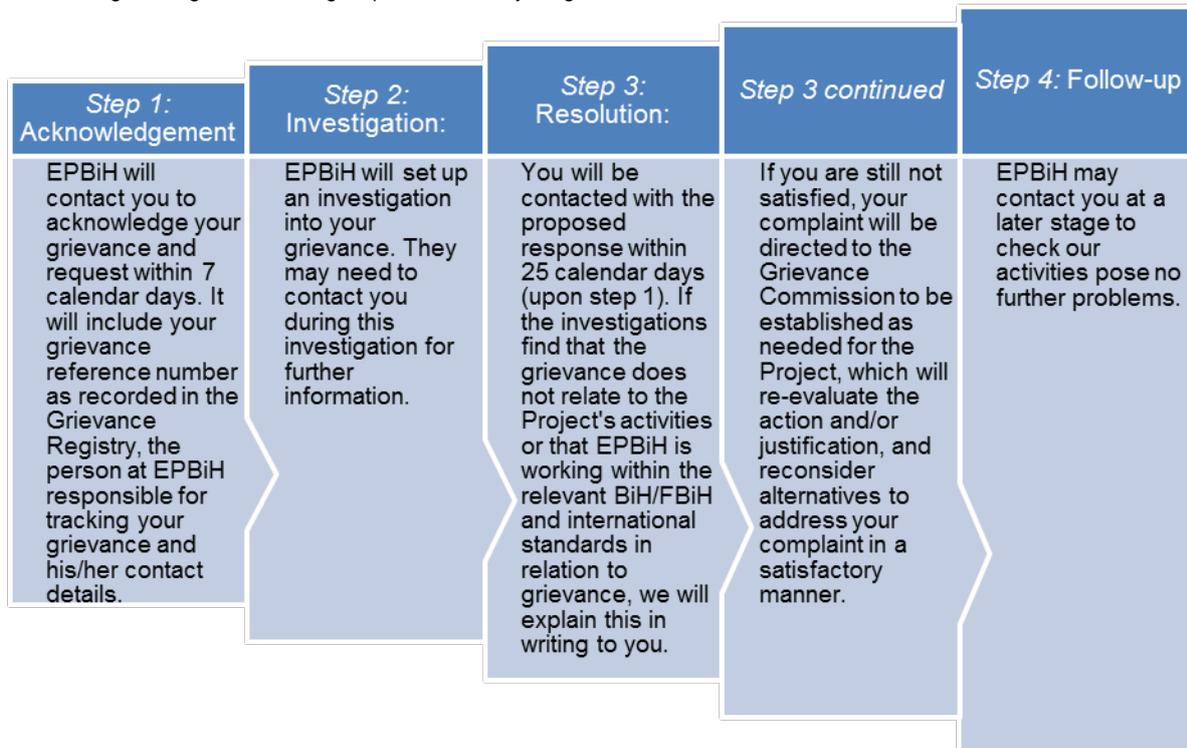
Contact information:

Attention: Project Implementation Unit
Public Company “Elektroprivreda BiH” Sarajevo
Address: Vilsonovo Šetalište 15, 71 000 Sarajevo, Bosnia and Herzegovina
Tel.: +387 33 751 866
Fax: +387 33 751 033
E-mail: mheneretvica@elektroprivreda.ba

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, EPBiH will ensure that your name and contact details are not disclosed without your consent and only the EPBiH team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

How will EPBiH deal with my grievance?

EPBiH will go through the following steps to deal with your grievance:



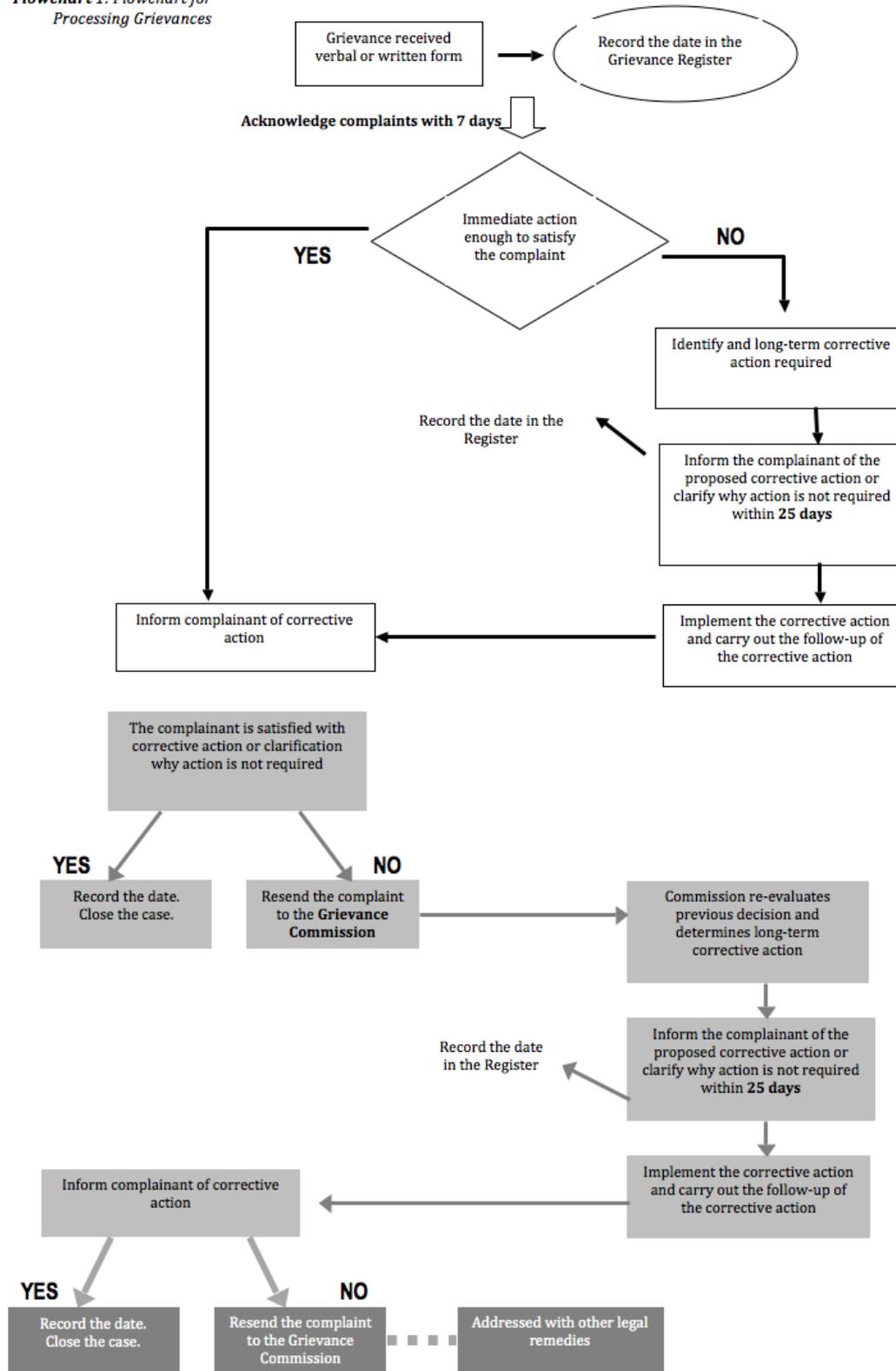
Appendix 3: Formal Access to Information Request Form

(in accordance with the Law on Free Access to Information of FBiH)

ACCESS TO INFORMATION REQUEST
_____ Name and last name of requester
_____ Address
_____ Telephone/telefax/e-mail
Date _____
PUBLIC COMPANY "ELEKTROPRIVREDA BiH" D.D. SARAJEVO Address: Vilsonovo šetalište 15, Sarajevo Bosnia and Herzegovina Tel: 387 33 751 737, +387 33 751 866 Fax: 387 33 751 033
SUBJECT: ACCESS TO INFORMATION REQUEST On the basis of the Law on Free Access to Information in FBiH, I request access to the following information: _____ _____ _____
(Indicate precisely which information you are requesting and describe as precisely as possible).
Indicate in which manner would you like to access the information: a. direct inspection, b. duplication of the information, c. delivery of information to the home address, d. delivery of information electronically – by e-mail (if possible).
Requester _____

Appendix 4: Flowchart for Processing Grievances

Flowchart 1: Flowchart for Processing Grievances



Appendix 5: Table of Interested Organisations

Note: Any organisations interested in the Project can send their contact details to the PIU to be included in the *Table of Interested Organisations* and notified directly about Project events.

	Name	Address
1)	Organisation of Sports Fishermen "Konjic"	Tel/fax: +387 36 727 268 Mob: +387 61 498123, 060 34 58 461 e-mail: osrkonjic@gmail.com web: www.osrkonjic.org
2)	Hunting Association "Neretvica" Buturović polje Konjic	Petrakijina 24, Sarajevo 71000 Tel: +387 668 209
3)	Enterprise "Šumarstvo Prenj d.o.o. Konjic"	Sarajevska 31, Konjic Tel: +387 36 726 209
4)	Ecological Society "Zeleni Neretva"	Omladinska 4 Konjic Tel/ Fax : +387 36 728 470 Email: zeleni.n@bih.net.ba