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FEDERACIJA BOSNE I HERCEGOVINE
FEDERALNO MINISTARSTVO
PROSTORNOG UREĐENJA



ENERGY EFFICIENCY IN PUBLIC BUILDINGS – FBiH STAKEHOLDER ENGAGEMENT PLAN

NOVEMBER 2025

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List of Abbreviations

EBRD	European Bank for Reconstruction and Development
EE	Energy Efficiency
FBiH	Federation of Bosnia and Herzegovina
FMSP	Federal Ministry of Spatial Planning
IPAM	EBRD's Independent Project Accountability Mechanism
NTS	Non-technical Summary
PIU	Project Implementation Unit
PR	(EBRD's) Performance Requirement
SEP	Stakeholder Engagement Plan

1 Executive Summary

The Federal Ministry of Spatial Planning (FMSP), with support from the European Bank for Reconstruction and Development (EBRD), is implementing an energy efficiency improvement project across 61 public buildings in the Federation of Bosnia and Herzegovina. The targeted buildings include administrative and government offices, medical institutions, social care facilities and correctional institutions. The Project aims to improve energy performance, reduce greenhouse gas emissions and lower operational costs while enhancing indoor comfort and climate resilience.

This Stakeholder Engagement Plan (SEP) has been developed to guide all stakeholder communication and feedback processes for the Project. The SEP identifies stakeholders and outlines specific communication requirements for each group of key stakeholders, which include:

- Users and staff of public buildings, such as patients and visitors.
- Institutional authorities responsible for compliance, permitting and approvals.
- Contractors and subcontractors involved in construction, monitoring and supervision activities.

Construction works will be carried out while the public buildings remain operational. As such, the SEP includes a Communication and Coordination Procedure to minimise disruptions and ensure safety during implementation. Special provisions will be made for sensitive sites such as hospitals.

The SEP also establishes a Project-level grievance mechanism that is accessible, confidential and responsive to all stakeholders. Grievances may be submitted in various forms and will be processed and addressed by FMSP in accordance with defined timelines.

Finally, all stakeholder engagement activities and grievance outcomes will be tracked and reported through regular updates to EBRD. This SEP is a living document and will be updated as needed to reflect changes in Project scope, stakeholder needs or feedback.

The table below lists all FMSP obligations under this SEP:

Obligation	Description
Document disclosure	Disclose the SEP, Non-Technical Summary (NTS) of the Project, Public Grievance Leaflet and Grievance Form in local and English language, online and in print.
Feedback collection	Provide a one-month period for stakeholders to submit feedback after document disclosure and designate a contact person for communication. Review all submitted comments and suggestions; prepare and publish a 'comments matrix', summarising feedback and FMSP responses.
Develop and maintain a grievance mechanism	Establish an accessible, confidential and effective grievance mechanism for the public and process grievances according to clear steps. Acknowledge grievances within 5 calendar days, resolve or respond within 10 days, and maintain a Grievance Registry with full case tracking.
Ensure visibility of grievance mechanism	Display the Public Grievance Leaflet and Grievance Form at public building entrances prior to start of works and make them available online.
Develop a Communication and Coordination Procedure	Jointly with contractors, define coordination protocols, meeting schedules and special provisions (e.g., for prisons or hospitals).
Inform the public about construction works	Publish notice of construction works at least 30 days in advance on FMSP's and institutions' websites and at all building entrances.
Monitor and report engagement activities	Track stakeholder engagement activities, grievances and feedback in regular Environmental and Social Reports to EBRD.
Update SEP as needed	Periodically revise the SEP to reflect changes in Project activities or new stakeholder input.

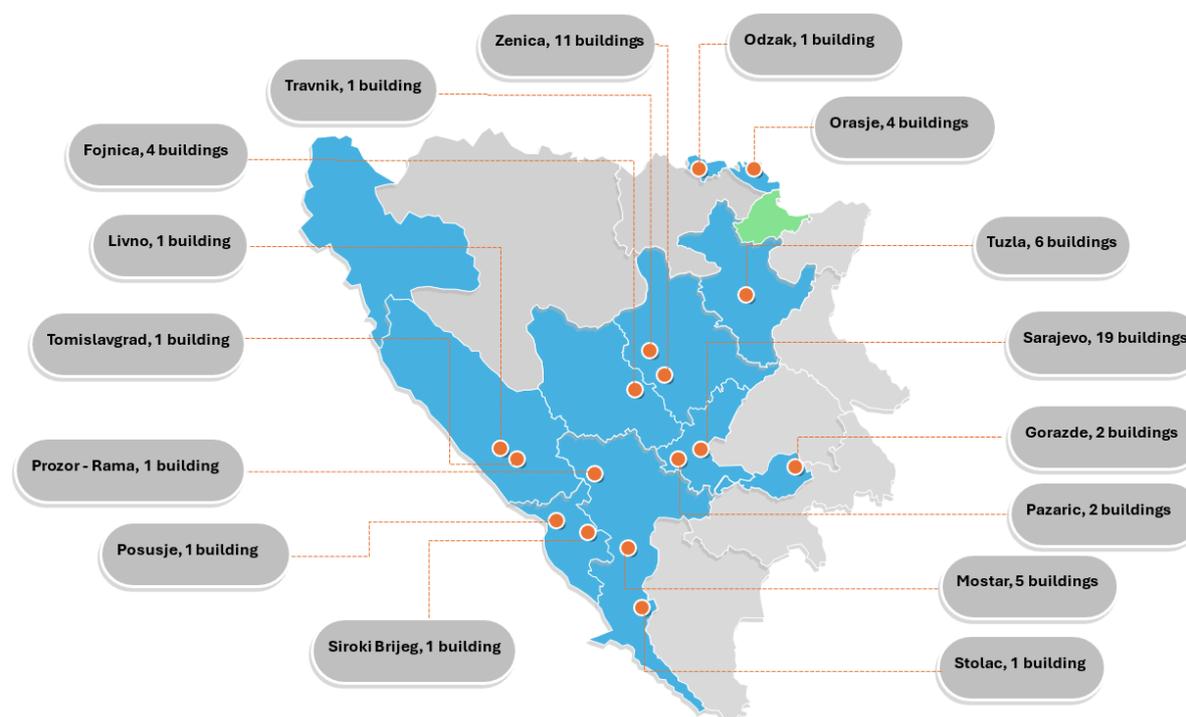
2 Introduction

2.1 Project Context

Context. EBRD is considering providing financing to the Federal Ministry of Spatial Planning (FMSP) to support energy efficiency (EE) improvements in public buildings across the Federation of Bosnia and Herzegovina (FBiH) (the Project). The Project will target 61 public buildings, including administrative and government buildings, medical institutions, social and healthcare institutions and correctional facilities, implementing a range of EE measures to enhance energy performance, reduce greenhouse gas emissions and lower energy consumption.

Decisions regarding construction or renovation of the public buildings involved in this Project are made by FMSP. FMSP will therefore be responsible for overall Project implementation, including tender announcements and the selection of contractors and supervisors. FMSP has established a Project Implementation Unit (PIU) to act as the central body responsible for project planning, procurement, coordination and reporting.

Project buildings. The Project buildings are located throughout the entire FBiH, predominantly in urban environments, in 9 cantons and 16 municipalities. The following figure presents geographical distribution of Project buildings.



The table below provides an overview of all buildings included in this Project.

Table 1: List of public buildings within the Project

Municipality/ City	Public Building
Fojnica	1. Institution for Social Care and Health Nursing – Drin, House 4
	2. Institution for Social Care and Health Nursing – Drin, House 5
	3. Institution for Social Care and Health Nursing – Drin, House 8
	4. Institution for Social Care and Health Nursing – Drin, Department A
Gorazde	5. Tax office Gorazde
	6. Federal Institute for Pension and Disability Insurance – Administrative Service for the Bosnian-Podrinje Canton, headquartered in Gorazde
Hadzici	7. Institution for Social Care, Health Support, Education and Training – Pazaric, Centre for Education and Training

Municipality/ City	Public Building
	8. Institution for Social Care, Health Support, Education and Training – Pazarić, Administrative Building
Livno	9. Privatisation Agency of the Herceg-Bosnia Canton 10
Mostar	10. University Clinical Hospital Mostar - Paediatrics Clinic
	11. Headquarters of the Federal Institute for Pension and Disability Insurance – Mostar
	12. Union Bank Mostar
	13. Mostar Correctional Facility
	14. Government of the Federation of Bosnia and Herzegovina, headquartered in Mostar
Odzak	15. Tax Office Odzak
Orasje	16. Orasje Correctional Facility - New Administration Building
	17. Orasje Correctional Facility - Former Administration Building
	18. Orasje Educational and Correctional Facility – Building 4
	19. Orasje Educational and Correctional Facility – Building 5
Posusje	20. Tax Office Posusje
Prozor-Rama	21. Tax Office Prozor - Rama
Sarajevo	22. Clinical Centre of the University of Sarajevo – Organisational Unit for Scientific Research and Professional Development (K-022)
	23. Clinical Centre of the University of Sarajevo - Clinic for Oncology (K-024)
	24. Clinical Centre of the University of Sarajevo - Old Radiology Clinic (K-026)
	25. Clinical Centre of the University of Sarajevo - III Internal Medicine - Cardiology Clinic
	26. Clinical Centre of the University of Sarajevo - Infectious Diseases Clinic
	27. Clinical Centre of the University of Sarajevo - Nephrology Clinic
	28. Clinical Centre of the University of Sarajevo - Administration
	29. Clinical Centre of the University of Sarajevo - Technical and Economic Department
	30. Clinical Centre of the University of Sarajevo - Old Surgery Unit
	31. Clinical Centre of the University of Sarajevo - Technical Sector (K-002)
	32. Clinical Centre of the University of Sarajevo - Diagnostics and Polyclinic (K-028)
	33. Clinical Centre of the University of Sarajevo - Central Medical Block (K-031)
	34. Tax Administration of the Federation of Bosnia and Herzegovina
	35. Federal Ministry of Culture and Sports
	36. Police Hall Sarajevo
	37. Institute for Transfusion Medicine of the Federation of Bosnia and Herzegovina
	38. Government of the Federation of Bosnia and Herzegovina
	39. Federal Institute for Employment
	40. Public Institution Center for the Education of Judges and Prosecutors in the FBiH
	Siroki Brijeg
Stolac	42. Tax Office Stolac
Tomislavgrad	43. Tax Office Tomislavgrad
Travnik	44. Federal Institute for Pension and Disability Insurance – Administrative Office for the Central Bosnia Canton, headquartered in Travnik
Tuzla	45. University Clinical Center Tuzla - House for Parents of Children in Hospice Care
	46. University Clinical Centre Tuzla - Clinic for Psychiatry
	47. University Clinical Center Tuzla – Common Services Unit “Plava baraka”
	48. Tuzla Correctional Facility – Main Building
	49. Tuzla Correctional Facility – Kozlovac, Separate Building
	50. Tuzla Canton Ministry of Finance
Zenica	51. Zenica Correctional Facility – Pavilion 2
	52. Zenica Correctional Facility – Pavilion 3
	53. Zenica Correctional Facility – Pavilion 4

Municipality/ City	Public Building
	54. Zenica Correctional Facility – Pavilion 5
	55. Zenica Correctional Facility – Pavilion 6
	56. Zenica Correctional Facility – Pavilion 7
	57. Zenica Correctional Facility – Pavilion 8
	58. Zenica Correctional Facility – Workshop and Education Facility
	59. Zenica Correctional Facility – New Administration Building
	60. Zenica Correctional Facility – Former Administration Building
	61. Tax Administration of the Federation of Bosnia and Herzegovina - Cantonal Tax Office Zenica

Planned measures. The Project will involve the following measures:

No.	EE measures
1.	Thermal insulation of external walls
2.	Thermal insulation of the ceiling towards the attic
3.	Replacement of existing external windows and doors
4.	Improvement of the efficiency of the HVAC system – boiler replacement
5.	Improvement of the efficiency of the HVAC system – replacement of thermostatic valves
6.	Lighting system replacement
7.	Establishment of an energy management system for buildings
No.	Non-EE and RES measures
1.	Interior adaptation of the building
2.	Exterior adaptation of the building
3.	Installation of solar panels
4.	Reconstruction and rehabilitation of the sewerage network

Project benefits. The introduction of EE measures in the Project buildings will reduce energy consumption, greenhouse gas emissions and operating costs. This will be further supported by reducing fossil fuel use through boiler replacement. Insulating building envelopes and replacing windows and doors will enhance indoor comfort and improve the buildings' resilience to climate change. Roof insulation will address risks from strong winds and heavy precipitation, while replacing deteriorating materials will improve durability and safety. The removal of asbestos cement roofing will contribute to a healthier environment for building occupants and workers. The reconstruction and rehabilitation of the sewerage network will improve the reliability of wastewater collection and discharge, thereby enhance hygiene and reducing the risk of localised pollution. Floor insulation will reduce thermal bridging and improve comfort and longevity. These EE measures will also support the country's national climate and energy goals.

Categorisation. The Project is categorised "B"¹ in accordance with EBRD's Environmental and Social Policy 2019.

A detailed description of the planned works is provided in the **Non-technical Summary** which is part of the Project's disclosure package along with this Stakeholder Engagement Plan.

¹ An EBRD project is categorised B when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures.

2.2 Objectives and Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by FMSP in order to clearly outline how it will engage with interested and affected parties throughout the Project. The main goal of this SEP is to support informed decision-making and ensure that all stakeholders have timely opportunities to participate, express their views and raise any concerns that could influence Project outcomes.

This SEP is a live document that will be periodically updated by FMSP as necessary to reflect key changes in Project activities or any new developments in the Project scope.

Note: At this stage, no specific stakeholder engagement activities have been conducted by FMSP. All future engagement will follow the framework set out in this SEP.

3 Regulatory Requirements for Stakeholder Engagement

3.1 Local Legislation Requirements

The FBiH *Law on Free Access to Information* ensures the access to information for all stakeholders, including every natural person or legal entity. Therefore, FMSP must take all necessary measures to assist individuals and entities in exercising their rights. The Law also requires FMSP to operate under the principle of freedom of access to information, making all details regarding its operations, organisation and financial management publicly available on its website.

In 2008, Bosnia and Herzegovina ratified the Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters. The Convention states that it applies to all levels of government and “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].” Accordingly, FMSP is required to provide access to environmental information to the public and respond to requests from the public for environmental information.

3.2 EBRD Requirements

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

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

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

3.3 Aligning with EBRD’s Requirements

There are several key differences between local legislation and the standards set by EBRD. One major requirement of the EBRD is the preparation of a Stakeholder Engagement Plan (this document), which provides a structured approach to sharing project information and conducting consultations. The EBRD also requires that

both the SEP and a Non-Technical Summary of the project be made publicly available for category B projects to ensure transparency and accessibility of information.

In addition, the EBRD calls for the establishment of a dedicated grievance mechanism for all projects. This mechanism must be easily accessible to all stakeholders and is intended to function alongside existing legal and administrative channels.

This SEP has been developed to address these gaps and to ensure that this Project fully complies with the EBRD's requirements for open and transparent stakeholder engagement.

4 Project Stakeholders

Project stakeholders have been identified to ensure that all necessary consultation needs are met. These stakeholders include individuals or groups who are directly or indirectly affected by the Project, those who have an interest in its activities, as well as those who may influence the Project or its final outcome.

The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in the next chapter. It should be noted that any stakeholders not identified at this stage of the Project may directly contact FMSP to make themselves and their needs known, and to facilitate the effective implementation of this SEP.

1) Personnel/visitors/patients/users of public buildings

The primary stakeholders for the Project include personnel, visitors, patients, temporary occupants and users of institutions included in the Project. No temporary relocation or off-site resettlement is planned; all works will be conducted with users in-situ, using phased or localised implementation. Therefore, the Project foresees that work schedules will be closely coordinated with each public building to ensure service continuity and minimise disruption. Facilities providing continuous care (such as hospitals and social institutions) will require stricter coordination, with contractors to plan construction to avoid impacts on essential services and vulnerable users.

The following outlines specific characteristics of each type of institution in relation to their respective occupants and users:

- Administrative and government buildings (tax offices, pension and disability insurance offices, ministries, banks): These institutions operate Monday to Friday, typically from 8:00 am to 4:30 or 5:00 pm, and are closed on weekends and public holidays. Due to the services they offer, they receive a high number of visitors during working hours.
- Medical institutions (public hospitals, clinical centres): These institutions provide continuous healthcare services, operating 24/7 basis to ensure patient care, monitoring and emergency response. Ambulatory patients and hospital visitors are generally allowed access only during designated visiting hours. Some specialised clinics, such as Radiology and Oncology, are equipped with highly sensitive and highly valuable equipment (e.g., scanners, X-ray machines, MRIs, etc.) which are particularly vulnerable to vibrations and other external impacts. Because of the constant operation of these facilities and the sensitivity of their patients and equipment, careful coordination between medical staff and contractors will be essential to minimise disruptions during construction works.
- Social and healthcare institutions: These institutions employ a range of personnel, including educators and medical professionals. In addition to staff, they provide on-site accommodation for beneficiaries who live on-site and require specialised care due to mental or physical disabilities. Operating 24 h a day, these facilities must maintain uninterrupted services, making close coordination between management and contractors essential to avoid disruptions, particularly given the vulnerability of their residents.
- Correctional facilities (prisons of both closed and semi-closed types): Correctional facilities accommodate both security staff and inmates who remain on-site 24 h a day. Due to inherent security risks associated with such institutions, strict access protocols are enforced. These may include advance notice for all visitors, mandatory identity verification, restrictions on personal belongings and supervised movement within the facility. Since potential hazards include noise, restricted movement in confined areas, exposure to construction tools or materials that could be misused, disruption to security infrastructure, etc. construction activities will have to be carefully coordinated with prison authorities.

Construction activities can create various health and safety risks for building users, staff and visitors. These include poor air quality from dust during demolition and drilling, exposure to chemicals and strong odours from paints and adhesives, and increased noise and vibration from heavy machinery that may disturb patients or damage sensitive equipment. Electrical system upgrades may also pose fire or electrocution risks if not handled properly. Additionally, EE works could block or disable important fire safety systems, such as hydrants, alarms, evacuation routes or emergency access points.

Patients and persons with disabilities as listed above are a particularly sensitive (vulnerable) category who may have increased sensitivity to factors such as noise, dust and other challenges associated with ongoing construction activities.

Construction may cause traffic congestion or temporary closure of pathways, potentially affecting institutional access. While most sites have multiple access points, this risk will need to be managed through planning.

The Project has foreseen adequate measures to eliminate or minimise all these risks, as described in detail in the Non-technical Summary which is part of the disclosure package together with this SEP.

2) Authorities overseeing compliance and approvals

Planned EE works will be carried out upon obtaining formal consent from the relevant municipal/city level authorities since the implementation of EE measures are classified as “routine maintenance”, i.e., works that do not affect structural integrity, use, size or appearance of a building. Such works do not change the intended use of the originally constructed building, nor do they alter the conditions defined in the original urban planning consent or construction permit issued at the time of construction. This process does not require an extensive design and approval procedure but is instead managed through the submission of a formal request outlining the proposed measures, followed by the issuance of consents².

In addition, before any construction works begin on buildings located within protected historical-urban landscape or potentially subject to cultural heritage protection, a formal approval must be obtained from the federal and/or cantonal institutions³. The involvement of these institutions is essential to ensure that all interventions within the Project are in line with legal requirements related to heritage protection (approval of materials, colour schemes, etc.).

3) Contractors or subcontractors for construction, monitoring and supervision of works, and their employees

The contractors or the supervision engineer have not been selected yet but are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.

The challenges for contractor’s workers in all Project buildings will involve general construction risks. A specific issue will be handling of asbestos-containing materials in some buildings. Prior to the commencement of any works, a survey will be required for all buildings, and tailored Management Plans will need to be developed as necessary before any construction work begins.

² Only of the Project buildings (a government building in Mostar) is in a state of advanced disrepair. Due to its condition, it cannot be included under standard “routine maintenance” obligations after EE measures are applied. A more detailed approach will be required, including tailored design documentation. This may also trigger the need for reconstruction or other construction permits beyond those related to EE works.

³ While federal-level approval is generally required for works in these protected zones, cantonal institutions may also be involved where they exist (not all cantons have cultural heritage institutions). Responsibilities can sometimes be unclear due to variations between cantons, but this is typically resolved through the standard permitting process.

5 Stakeholder Engagement Program

Effective stakeholder engagement relies on transparent information disclosure and meaningful consultations. This section details the FMSP's strategy and planned activities to keep all stakeholders informed and involved.

5.1 Document Disclosure and Public Feedback Process

FMSP will disclose the following documents as early as possible in the Project development process:

- this SEP, the Public Grievance Leaflet (Appendix 1 of this SEP) and Project Grievance Form (Appendix 2) of this SEP), and
- the Non-technical Summary (NTS) of the Project.

The documents will be publicly available in local and English language in electronic and printed forms on the website of FSMP (<https://fmpu.gov.ba>) and its physical address: Hamdije Cemerlica 2, Sarajevo.

Once the documents listed above are made publicly available, stakeholders will have a period of one month to submit their feedback, including any opinions or concerns related to the Project. FMSP will clearly communicate the contact person responsible for collecting feedback, along with the specific timeframe and instructions for submitting comments.

All input received during this period will be carefully reviewed and considered by FMSP. At the end of the public review, a summary report (referred to as a “comments matrix”) will be prepared. This report will include an overview of all comments and proposals submitted by stakeholders, along with FMSP’s responses and explanations on how the feedback was addressed. The comments matrix will be published on FMSP’s website to ensure transparency and inform stakeholders.

5.2 Communication and Coordination Procedure

To enhance coordination throughout the construction period, FMSP will establish a Communication and Coordination Procedure after the contractor is selected, including:

- A formal coordination mechanism among construction managers and representatives of institutions outlining the processes for scheduling, executing and supervising construction activities, with a special emphasis on coordinating noisy construction works.
- Ensuring that staff are regularly informed about potential H&S issues and providing updated on EE measures being implemented as well as instruction on handling any safety incidents related to the works.
- Definition of the required frequency of coordination (e.g. daily, weekly or as mutually agreed), based on the sensitivity of each facility and the nature of works.
- Where necessary and possible, allowing for construction works to be scheduled outside regular working hours (e.g. evenings, weekends) to minimise disruption to core services or accommodate institutional needs.
- Special provisions for correctional facilities which operate under strict entry and exit protocols, requiring prior notification and approval/clearance of entry.

Note: The Communication and Coordination Procedure will be drafted by FMSP and the contractor, and circulated to all institutions for review and formal approval prior to the start of construction activities. The Procedure will reflect the specific operational needs of each institution and incorporate their feedback on preferred coordination arrangements.

5.3 Informing the Public About Construction Works and the Grievance Mechanism

FMSP will also commit to providing clear information about the planned construction activities. This will be ensured through publication of a notice detailing the start and duration of the works, accompanied by the Public Grievance Leaflet and the Project Grievance Form, at least 30 days before the start of works through:

- the websites of FMSP and all the involved public institutions
- displaying the notice at the entrances to all 61 public buildings

5.4 Engagement Objectives and Methods

The list of identified stakeholders and specific communication requirements are provided in the table below.

As noted previously, this list of stakeholders below may not be final, and any stakeholders not identified at this stage of the Project may directly contact FMSP to make themselves and their needs and interests known. The SEP will be updated accordingly by FMSP. Suggestions for improvement of proposed communication methods are also welcome and can be sent to FMSP.

Table 2: Engagement objectives and methods

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
Personnel/visitors/patients/users of public buildings	Construction-related concerns related to health and safety if not properly managed, such as poor air quality from dust during demolition and drilling, exposure to chemicals and strong odours from paints and adhesives, and increased noise and vibration from heavy machinery that may disturb patients or damage sensitive equipment, etc.	<ul style="list-style-type: none"> • Access to Project documents online and in printed form, and opportunity to provide feedback to the Project documents • Regular coordination meetings between the public building managers and the contractor, per the Communication and Coordination Procedure (see section 5.2 above) • Notice detailing the start and duration of the works and containing information on the grievance mechanism displayed at the entrances to all public buildings • Responding to inquiries/ grievances through the Project grievance mechanism (see Chapter 6) 	<ul style="list-style-type: none"> • Project disclosure package (SEP, NTS, Public Grievance Leaflet, Grievance Form) and comments matrix • Regular information on potential H&S issues and updates on EE measures being implemented per the Communication and Coordination Procedure • Information on the extent, timing and duration of planned works • Information on grievance mechanism
Authorities overseeing compliance and approvals	Control of compliance with national legislation	<ul style="list-style-type: none"> • Official communication channels • Monitoring based on national legislation requirements 	<ul style="list-style-type: none"> • Permitting requirements, monitoring/audit reports
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	Health and safety; implementation of Asbestos-Containing Material Management Plans in relevant buildings, labour and working conditions; environmental setting and impacts	<ul style="list-style-type: none"> • Regular communication with public building managers • Information through contracting • Toolbox talks at construction sites on health and safety topics • Responding to inquiries/ grievances through the workers' grievance mechanism 	<ul style="list-style-type: none"> • Communication and Coordination Procedure • Work safety and health regulations, environmental protection requirements • Information on workers' grievance mechanism

6 Grievance Management

Overview. FMSP will ensure that the implementation of the Project will not result in adverse impacts for personnel, visitors, patients and users of public buildings. The PIU within FMSP has set up a Project-level grievance mechanism for receiving, evaluating and addressing grievances. The mechanism will address concerns promptly and effectively in a transparent manner, free from manipulation, interference, coercion, discrimination, intimidation and retaliation, and it will be accessible to all affected parties, at no cost.

This chapter includes the following supporting appendices:

- Text for Public Grievance Leaflet (Appendix 1),
- Project Grievance Form (Appendix 2) and
- Template of the Grievance Registry (Appendix 3).

The following sections of this chapter elaborate the Project grievance procedure and steps. A separate grievance mechanism is available for workers.

Visibility of the grievance mechanism. The visibility of the grievance mechanism will be ensured through:

- Disclosing the Public Grievance Leaflet and Project Grievance Form together with SEP and NTS as early as possible in the Project development process.
- Prior to the start of construction, ensuring that each public building displays a notice detailing the start and duration of the works on their main entrances accompanied by the Public Grievance Leaflet and Project Grievance Form.

Submitting grievances. Any concern 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 or e-mail to the address/number given below). Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of construction works, the Project Grievance Form may also be submitted directly to the contractor (e.g. construction site manager) and/or supervision engineer.

Any grievances received by the contractor/supervision engineer will be forwarded to the PIU without delay (within 24 hours) to allow PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

Recording and acknowledging grievances. PIU will record all grievances in the Grievance Registry. Written and non-anonymous grievances will be acknowledged within 5 calendar days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- description of grievance, including an indication of the **type (topic) of the grievance** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as:
 - i. grievances related to any gender-based violence and harassment
 - ii. grievances related to other construction nuisances such as improper waste management, noise, dust, etc.
- details about the **complainant profile**, to understand who and where is most affected by negative impacts of the Project (*note: this information will be considered confidential and only disclosed to FMSP staff working on grievances*)
- **date of receipt** of grievance and **date of acknowledgement** returned to the complainant
- **description of actions** taken (investigation, corrective measures, preventive measures)
- **date of resolution and closure**/provision of feedback to the complainant

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

Grievance resolution. 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 may be identified if relevant. The complainant will be informed about the proposed immediate action or any long-term action within 10 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. The PIU will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

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, if relevant, an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

At all times, complainants may seek other legal remedies in accordance with the local legislation, including formal judicial appeal.

Project Implementation Unit – Energy Efficiency in Public Buildings in FBiH

Ministry of Spatial Planning of FBiH

Email: info@fmpu.gov.ba

Tel: +387 33 726 500

Address: Hamdije Cemerlica 2, Sarajevo

Website: www.fmpu.gov.ba

EBRD's Independent Project Accountability Mechanism. In addition to the Project-level mechanism managed by FMSP, the EBRD's Independent Project Accountability Mechanism (IPAM)⁴, as an independent tool which aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD-financed projects or to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

⁴ Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

7 Monitoring and Reporting

The results of the stakeholder engagement process will be included in regular **Environmental and Social Reports to EBRD** which will be prepared by FMSP. The reports will include, in particular, the following information:

- **Number and types (topics) of received grievances** raised in the reporting period by **type (topic) of the grievance** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as: grievances related to any gender-based violence and harassment, grievances related to other construction nuisances such as improper waste management, noise level, dust, etc.;
- **Number and types of information disclosure and engagement activities** through all channels, with information on issues and concerns raised and information on how the issues raised were taken into consideration by the FMSP.

The FMSP will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the implementation and updating of this SEP and reporting to EBRD.

8 Appendices

Appendix 1: Text for Public Grievance Leaflet

The FBiH Ministry of Spatial Planning is striving to ensure that the establishment and development of the **FBiH Public Buildings Energy Efficiency Project** brings positive outcomes to personnel/visitors/patients/users within the Project buildings. While every effort will be made to minimise disturbances, we recognise that concerns may still arise. If you are affected by the Project in any way, we encourage you to share your concerns or grievances with us.

What kind of grievance can I lodge? A grievance is any concern or complaint related to the Project's activities. Anyone can submit a grievance if they feel that Project activities are negatively affecting them or their environment. Examples of grievances could include, but are not limited to:

- > Increased noise, access issues or other nuisances during construction works within the Project buildings
- > Blocked building entrances
- > Poor waste management practices
- > Unsafe construction zones
- > Damaged property
- > Lack of timely information about the scope or schedule of works

How can I submit a grievance? Anyone can submit a grievance to FMSP (contact information given below) or the contractor/supervision engineer on site (once construction starts) 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 by personal delivery, post or e-mail

Contact information:

<p>Project Implementation Unit – Energy Efficiency in Public Buildings in FBiH</p> <p>Ministry of Spatial Planning of FBiH</p> <p>Email: info@fmpu.gov.ba</p> <p>Tel: +387 33 726 500</p> <p>Address: Hamdije Cemerlica 2, Sarajevo</p> <p>Website: www.fmpu.gov.ba</p>
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Any grievances you submit to the contractor/supervision engineer will be forwarded to the FMSP to allow the Ministry to further process the grievance/comment.

You may choose to submit your grievance anonymously. If you provide your name and request confidentiality, your identity and personal details will not be disclosed without your consent. Only staff directly handling your case will have access to this information. If full investigation of the grievance is not possible without revealing your identity, FMSP will inform you first.

How will the FMSP deal with my grievance? The FMSP will go through the following steps to deal with your grievance:

Step 1: Acknowledgement

- > Within 5 calendar days, FMSP will confirm receipt of your grievance (if not submitted anonymously).
- > You will receive a reference number, the name of the responsible person and their contact details.
- > If your grievance is unclear, we will assist you in rephrasing or clarifying it.

Step 2: Investigation

- > FMSP will assess your grievance and, if needed, request additional details from you.
- > A thorough investigation will be initiated.

Step 3: Response

- > Within 10 calendar days of acknowledging your grievance, FMSP will provide a formal response. You will be informed of corrective actions taken or planned.
- > If your grievance is not related to the Project or no breach is found, a written explanation will be provided.

Step 4: Follow-up

- > FMSP may contact you later to confirm that the issue has been resolved and that there are no continuing concerns.

Appendix 2: Project Grievance Form

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

Signature: _____

Date: _____

Please return this form to:

<p>Project Implementation Unit – Energy Efficiency in Public Buildings in FBiH Ministry of Spatial Planning of FBiH Email: info@fmpu.gov.ba Tel: +387 33 726 500 Address: Hamdije Cemerlica 2, Sarajevo Website: www.fmpu.gov.ba</p>
