The transport Corridor Vc is a motorway planned to run for 330 kilometers through Bosnia and Herzegovina. Various sections of this corridor are being financed by the EIB and the EBRD. In 2018, the EIB signed a loan of EUR 100 million for the Mostar South- Tunnel Kavnj section of the corridor.

In 2017, a group of citizens came to the EIB Complaints Mechanism with the concern that the route eventually selected for construction on the Mostar South section was not the one that was subject to the Environmental and Social Impact Assessment process. The selected route would cross a large agricultural valley near Blagaj, which will result in the destruction of valuable arable land and would have a negative impact on a cultural site, a quarry that supplied the stones for the old bridge of Mostar – also a UNESCO World Heritage site. The investigation is still ongoing.

**Non-transparent decision-making**

CEE Bankwatch Network mission to the project in October 2020 documented that the Corridor Vc route south of Mostar was planned to run through the Neretva valley, but due to strong local opposition, in 2011 this was changed to a route on the nearby plateau. In 2015-2016 yet another decision was made, in the national parliament, to return the route down into the valley again, on a somewhat different alignment. This decision was not subject to prior Environmental Impact Assessment process and the public consultations despite the route runs through villages and fertile agricultural land in the valley, as well as twice crossing extremely valuable river ecosystems. In addition, the multi-criterial analyses of route variants, conducted in the past, were not available to the public at the time of consultations, including to affected communities.
Recent public consultations conducted in 2020 for the limited part of the section in question, revealed objections voiced by people in local communities. Many interested people were denied access to the ESIA consultations in September 2020, due to Covid-19 restrictions. Other opportunities for on-line consultations were not provided.

**A threat to the fragile balance of interests of different ethnic groups in this post-war community**

The impacts of the route on the property and livelihoods of Serb war returnees, who have rebuilt their lives in the South Mostar area in the last two decades, have been marginalised and not given due regard. This has resulted in concerns about divisive and politicised decisions that go against the peacebuilding efforts and against the Dayton Peace Agreement. Local people have submitted two court cases alleging discrimination, which are currently ongoing.

Ethnic minorities should be treated as vulnerable groups that require additional safeguards and consultations, according to the EIB’s social standards, however, the 2020 ESIA (and also previous EIA Reports) fails to provide either detailed analysis or adequate mitigation measures.

The failure to conduct transparent and inclusive consultation on the ESIA only increased the sense of injustice among impacted communities and narrowed the prospects of a successful resolution of their grievances.

**Illusory public consultations**

Furthermore, in an assessment published on 6 January 2021 by the EBRD Accountability Mechanism, both the EBRD and its client commented that the route selection was a done deal and the ESIA consultations or problem-solving facilitated by the mechanism would be unlikely to reverse a decision made in the past which is a clear indication that the consultation process was not meaningful and did not take place when all options are open, as required by the Aarhus Convention and the EIB’s environmental standards.

**Biodiversity at risk**

There are concerns about the impact of the selected valley route on biodiversity. The ESIA and critical habitat assessment suffer from numerous inadequacies, including lack of fieldwork, outdated fish data, lack of analysis whether the project meets the critical habitats conditions of the EIB’s environmental standards, a flawed approach to applying the EU’s Habitats Directive, lack of information about gravel extraction, and unrealistic mitigation measures.

**Recommendations**:

Thus we call on the EIB to require for the project a solid and transparent Environmental Impact Assessment process with meaningful, inclusive and non-discriminatory public participation in line with the EIB’s environmental and social standards.