

Corridor Vc motorway, Bosnia and Herzegovina



Photo: CEE Bankwatch Network

Background

The 330-kilometre Corridor Vc motorway in Bosnia and Herzegovina is being co-financed by the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB) and the Western Balkan Investment Framework (WBIF), as well as public budgets in Bosnia and Herzegovina. Since 2007, the EBRD and the EIB have signed loans totalling EUR 1.8 billion for the BiH section of the Corridor. The European Union has also provided grants amounting to EUR 413 million through the Western Balkans Investment Framework (WBIF).¹

In February 2021, the EBRD approved a EUR 60 million loan to finance the construction of a motorway section from the Mostar South Interchange to Tunnel Kvanj, approximately 8.7 kilometres in length. The project has effectively been blocked for more than a year, and in the meantime, the Bank's accountability mechanism has been conducting a compliance review of the project. In July 2022, the EBRD is expected to approve an additional EUR 50 million in financing for the North Mostar – South Mostar section.

For more information

Fidanka Bacheva-McGrath
EBRD policy officer
CEE Bankwatch Network
fidankab@bankwatch.org

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¹ WBIF, [Mediterranean Corridor: Construction of Road Corridor Vc in Bosnia and Herzegovina](#), accessed 3 May 2022.

Main concerns

Major changes to the spatial plan in 2017 without public consultations

The present valley route for the highway sections surrounding Mostar has never been consulted with the public, in breach of the Aarhus Convention and the EBRD's Environmental and Social Policy.

Between 2011, when public consultations were held, and the adoption of the project-level spatial plan by the Federation of Bosnia and Herzegovina's parliament in early 2017, major changes to the route took place. Around 2010 and 2011, after protests from local communities, the route was moved from the Neretva valley up to the Podvezlje ridge. Then in 2016, it was again moved down to the valley, with a slightly different routing. No public consultations were held, only an informal presentation in January 2017 – a few days before the House of Representatives adopted the spatial plan – at which local people vigorously opposed the changes.²

The selection of the route lacks transparency and is not legitimately justified by adequate studies on the impacts on biodiversity and local communities. The lack of adequate studies on the impact the route will have on local communities has also been confirmed by the ruling of the Mostar municipal court on covert discrimination against war returnees in December 2021.³ The multi-criteria analyses (MCAs), which Bankwatch obtained in 2021, do not properly explain the decision to move the motorway route back into the valley.

On 28 December 2021, the municipal court in Mostar ruled that the Federation of Bosnia and Herzegovina's decision to build the Corridor Vc motorway through Kosor, Malo Polje, Blagaj, Ortiješ and Lakševine constituted covert discrimination against affected people by failing to conduct public consultations and justifying the changes to the spatial plan in 2017. The court also acknowledged that the war returnees have a disadvantaged position in realising their social and economic rights in the Federation. As a result, although the Mostar court does not have the competence to annul the spatial plan, it ruled that the plan and the decision to declare the Corridor Vc a project of public interest cannot be applied to the complainants, leaving the plan and the decision de facto unable to be implemented.

Furthermore, on 28 April 2022, affected residents from Malo Polje filed another lawsuit against the Federation of Bosnia and Herzegovina in defence of their constitutionally guaranteed freedom of opinion and association as well as the right to property and to participate in public affairs, which they hold were violated by the spatial plan in 2017.

Economic displacement and land acquisition irregularities

According to the EBRD's Environmental and Social Policy 2014, ethnic minorities are categorised as vulnerable groups who should be informed and their particular needs and concerns consulted in order to safeguard their

² Bljesak.info, [Burna rasprava u Blagaju: Autocesta će proći samo ako nas pobiju!](#), 22 January 2017.

³ Voice, [PRESUDA: Izmjenom trase Koridora 5c diskriminisan dio stanovništva u Mostaru](#), Voice, 17 January 2021.

rights. However, the disproportionate impact on the Serb minority and war returnees in the villages south of Mostar was not assessed in the 2020 environmental and social impact assessment (ESIA).⁴

The resettlement process in the subsection Mostar South interchange – Tunnel Kvanj has brought with it a string of irregularities,⁵ the most urgent of which is that landowners within the influence area of the project have not been directly consulted on the motorway and its accompanying impacts on their lives.

A 2021 Bankwatch report found that the project promoters' assessment of the project overlooked the proportionately more significant impacts on plots inside the project's 500-metre buffer zone in the subsection from the Mostar South interchange to tunnel Kvanj. In the project's impact assessment, this area covers a total of 1,071.32 hectares that may be indirectly affected during the construction and operation phases. The census and the socioeconomic survey conducted for the project, however, narrowly focuses on directly impacted persons who own land or houses located on the motorway route, but not those who own neighbouring plots. The EBRD's Independent Project Accountability Mechanism (IPAM) is currently looking into this issue.

Critical habitats under threat

The biodiversity studies for the section south of Mostar are not only insufficient, but also cover only a very small area around the adopted route defined in the spatial plan. They do not take into account the potential impacts of the motorway on subterranean fauna such as that found in the Bunica springs area. As a result, a new route design based on the existing biodiversity studies would still put critical habitats in danger.

The environmental assessment lacks sufficient baseline studies and significantly underestimates the impacts that will be caused by the construction and operation of the motorway in the Mostar South interchange – Tunnel Kvanj section. Apart from jeopardising the EBRD's rules on critical habitats, building two bridges across the rivers Buna and another one over the river Bunica could damage the spawning habitat of the globally endangered soft-mouthed trout, *Salmo obtusirostris*. The Buna, Bunica and Neretva rivers were declared protected areas during Yugoslav times, and Bosnia and Herzegovina should continue to protect them – but these protection regimes were not taken into account when approving the spatial plan or in any of the environmental impact assessment procedures. Moreover, the potential Natura 2000 site that includes Buna and Bunica was not assessed according to the Habitats Directive.

Additionally, the Neretva valley and surrounding mountains have extremely valuable and unexplored subterranean biodiversity with many endemic species. The caves, springs, subterranean waters and other karst features unique for Europe could be destroyed due to tunnel drilling or pollution during the motorway construction or exploitation. The subterranean biodiversity has not been researched at all, and the impacts of the motorway are unknown. In fact, much of this biodiversity might be destroyed before it is even discovered.

On the Prenj section

⁴ CEE Bankwatch Network, [Connecting or Dividing? The South Mostar section of Corridor Vc in Bosnia and Herzegovina](#), CEE Bankwatch Network, 21 January 2021, 14-15.

⁵ Đenana Kaminić-Puce, [Mostar postaje veliko gradilište: Mještani uznemireni, trasa im ide kroz imanja](#), NI, 17 February 2022.

In 2016, it was announced that a new route for the Prenj tunnel had been found, which was 18 kilometres shorter than the original version.⁶ No information about the environmental and social impacts of the new variant has ever been presented to the public and no consultations took place for this route change. Environmental impact assessments are being carried out for separate sub-sections, but since the spatial plan is already adopted, there is no real chance for the public to have an impact on the choice of route. This clearly contravenes Article 6.4 of the Aarhus Convention, which states: ‘Each Party shall provide for early public participation, when all options are open and effective public participation can take place.’

Conclusion and recommendations

By proceeding with this motorway project, which is based on an unlawful and illegitimate spatial plan, the EBRD risks confirming locals’ perceptions of foreign financiers as bolstering non-democratic actors’ desires to further cement the country in state capture. Furthermore, Bosnia and Herzegovina’s current political and constitutional crises are simply another warning that disruption and instability fuelled by high-level politicians remain a constant threat.

With the aforementioned unresolved issues in mind, as well as the ongoing IPAM compliance review, the EBRD should refrain from approving any new section of the corridor until the entire route around Mostar has been thoroughly researched and reassessed, including the section from Konjic across Prenj, the Prenj-Mostar North section, the Mostar North – Mostar South section, the section between the Mostar South interchange and Kvanj, and tunnel Kvanj. Even if the EBRD does not finance all of these components, the sections should be evaluated together in order to develop a coherent proposal and prevent bottlenecks. Therefore:

- **The EBRD must not accept the current spatial plan for the Corridor Vc as legitimate or workable.** Any consideration of other parts of the Corridor Vc in the Federation of Bosnia and Herzegovina, such as the Mostar North – Mostar South subsection, must be situated within a comprehensive re-assessment of the route between Konjic and Počitelj.
- **The EBRD needs to ensure compliance with its environmental and social standards for the entire section of the Corridor which is not yet built, from Konjic to Počitelj.** The project promoter, JP Autoceste, with assistance from the EBRD, should carry out a comprehensive assessment of the entire route, reassess alternative route options, and organise new public consultations based on improved environmental and social studies.
- **The EBRD also needs to ensure compliance with its social standards and assess the implications of the ruling on the discrimination case with regard to the adoption of the spatial plan in 2017.**⁷
- **The North Mostar – South Mostar section cannot and should not be considered separately from neighbouring sections, as is the case in the ongoing environmental impact assessment process.**

⁶ Edib Bajrović, [Koridor 5c preko Prenja: Stavovi “Za” i “Protiv”](#), *NI*, 12 March 2016.

⁷ CEE Bankwatch, [War returnees won discrimination case over re-routing of the EBRD and EIB financed motorway](#), *CEE Bankwatch Network*, 20 January, 2022.