



# ASSISTANCE TO CITIZENS IN THE FIGHT AGAINST CORRUPTION

QUARTER III 2023



**USAID**  
OD AMERIČKOG NARODA





# Description of the Project

The program “Assistance to Citizens in the Fight against Corruption (ACFC)” is implemented by the Centers for Civic Initiatives, the lead implementer, and Transparency International (TI BiH) and the Center for Media Development and Research (CRMA), the implementing partners. The project is funded by the United States Agency for International Development (USAID). The implementation period is from September 2019 to September 2024.

The program aims to increase citizens’ participation in combating corruption, and all of its activities are designed to encourage strong and sustainable anti-corruption activism across the country and across all levels. The purpose of the ACFC project is to help civil society become representative and credible in the fight against corruption.

The following activities are realized within the project:

- Monitoring and advocacy for anti-corruption legislation in the following areas: conflict of interest, whistleblower protection, public procurement, and abuse of public resources in election campaigns;
- Engagement of citizens and building a culture that rejects corruption;
- Coordination and building capacities of organizations involved.



**CORRUPTION IS NOT AN INDIVIDUAL PROBLEM !!!**



Are you a group of citizens facing corruption in your community and because of that you cannot exercise your own right or that of a broader group of people?

Do you suffer the consequences of bad decisions made amid the misuse of power or unlawful government conduct?

More information about how to receive assistance for your anti-corruption initiatives is available at the following link:

**063 396 536**

[protivkorupcije@ccibh.org](mailto:protivkorupcije@ccibh.org)

# Map of anticorruption activists across Bosnia and Herzegovina



Contact them via their FB pages!

Find our more at [antikorupcija.info](http://antikorupcija.info)

- Banja Luka**
  - CA "Restart Srpska"
  - Union of the Employers' Association of Republika Srpska
  - Association "Think good"
  - CA "Road of Justice"
  - ICG "Save Karanovac"
  - Center for Education "Pro Educa"
  - The Association "Perpetuum Mobile – Institute for Youth and Community Development"
  - The Association for Promotion of European Standards and Improvement of the Business Environment – Capital
  - Helsinki Citizens' Assembly Banja Luka
- Bijeljina**
  - Helsinki Committee for Human Rights
  - ICG "Stop illegal exploitation of gravel in Bijeljina"
- Bjelašnica**
  - ICG "To Stop Illegal Construction on Bjelašnica and Igman"
- Brčko**
  - ICG "For Transparent Financing of Non-Profit Organizations from the Budget of the Brčko District"
  - Youth Center Vermont
  - CA "Demos"
  - ICG "For recognized diplomas from accredited higher education institutions in the Brčko District of BiH"
- Breza**
  - ICG "To Remove an Illegal Waste Dump in Nedići, Breza"
- Bugojno**
  - ICG "Poriče"
- Bužim**
  - The Association of Dystrophics Bužim
- Doboj**
  - ICG "For the legal exploitation of minerals from the Bosna river"
  - ICG "STOP to unaccredited universities in the RS"
  - ICG "Remove Hexane from Kotorsko"
  - Center for Humane Politics
  - Citizens Association Tolerance of Diversity (ToPeeR)
- Drvar**
  - ICG "Drvar Without Italian Waste"
- Foča**
  - ICG "Drvar Without Italian Waste"
- Goražde**
  - ICG "Save Drina"
  - ICG „Goražde Without Pesticide“
- EastSarajevo**
  - NGG "Stop izgradnji mHE na ICG "STOP to the Construction of mHps on the river Kasindolska"
- Women's Interactive Rural Center (ŽIR)
- Jablanica**
  - ICG "For Doljanku"
- Konjic**
  - ICG "Neretvica - Let Me Flow"
- Kozarska Dubica**
  - ICG "React Against Irregularities Threatening the Health and Environment"
- Kreševo**
  - ICG "Stop Quarries Without Permits"
- Kakanj**
  - ICG "Nature Park Trstionica and Boriva"
- Livno**
  - CA "the Center for Citizens' Cooperation"
- Maglaj**
  - ICG "For Legal Exploitation of Minerals in the Upper Section of the river Bosna"
  - Association Fojničani
- Mostar**
  - CA "Because We Care"
  - ICG "Initiative against the construction of Buna 1 and 2 mHp"
  - ICG "Stop to illegal construction in Bijeli Brijeg"
  - ICG "No to construction on Buna and in my Blagaj"
  - ICG "Citizens' Initiative Kutī"
  - The Association for Improving Quality of Living – Futura Mostar
  - Association Bura info
- Petrovo**
  - ICG "Keepers of Ozren"
- Prijedor**
  - Consumer Protection Association "DON Prijedor"
  - ICG „Be My Voice“
- Sarajevo**
  - ICG "Hastahana park"
  - ICG "Initiative KCUS"
  - ICG "Zgrada"
  - Association „Ja BiH u EU“
  - Employers' Association in the Federation of BiH
  - BIRN BiH
  - Association "Baby Steps"
  - Association Union of the Fund's Employees
  - Forestry and Environment Action
  - Aarhus centa
  - ICG "Last minute rescue – Let's save Dobrinja"
  - The Union for Sustainable Return and Integrations in BiH
  - Association of Public Procurement Professionals, Trainers and Officers in BiH (UPTIS)
  - ICG „We Want Drinking Water and Clean Air – against the Illegal Construction on Bjelašnica and Igman
- ICG "Stop Construction Threatening Citizens -Aleja lipa"
- Sanski Most**
  - ICG "Life on Coal -NO to Exploitation that Endangers Life"
- Šipovo**
  - ICG "Farmeri"
- Tešanj**
  - ICG "Non-transparent spending of budget funds for water supply to citizens"
  - ICG "Keepers of Usora"
- Trebinje**
  - CA "Stop mobbing"
  - ICG "Movement for Restitution Trebinje"
- Trnovo**
  - ICG "Stop to Disposal of Illegal Waste at the Krupačke stijene Waste Dump"
- Tuzla**
  - The civic movement "Waking Up"
  - ICG "Initiative against the landfill for slag and ash from the thermal power plant in local community Šićki Brod"
  - The Association "Forum of Tuzla Citizens"
- Visoko**
  - ICG "To Prevent Abuse in Issuing Operation Permits to Organizers of Games of Chance (betting, lotteries, etc).
- Višegrad:**
  - ICG "Defend the Rivers of Višegrad"
  - ICG "Remove Illegal Waste Dump on the Outskirts of a Tourist Town"
- Vitez**
  - ICG "Courageous Women of Kruščica"
  - Initiative "Illegality of Spending the Building Maintenance Funds in Vitez"
- Vlasenica**
  - ICG „Eco Activists Vlasenica“
- Zenica**
  - ICG "Air guards"
  - ICG "Movement for change"
  - ICG "The Illegible Unemployed"
- Zvornik**
  - ICG "STOP to illegal gravel pits on the Drina river"
  - ICG "Stop the Construction of an Asphalt Base in Tršić"
  - ICG "Justice for (Hotel) Drina"
- Žepče**
  - ICG "Stop illegal exploitation of gravel in the area of Žepče and Zavidovići"



## THE FBiH GOVERNMENT'S BUDGET REBALANCE FOR 2023 SECURES AN ADDITIONAL BAM 10 MILLION FOR THE FBiH SOLIDARITY FUND

The FBiH Parliament has adopted the FBiH Government's Budget Rebalance Proposal for 2023, securing an additional BAM 10 million for the FBiH Solidarity Fund. Moreover, the FBiH Government made a conclusion calling on the cantonal governments and cantonal health insurance funds with budget surplus to join the efforts of the FBiH Government in solving the problem of treatment for severely ill patients in the FBiH and provide part of the funds needed for their treatment by the end of the year.

The associations perceive the FBiH Government's allocation of BAM 10 million as a positive gesture. However, they also warn that this should only be the beginning of work on the final arrangement of funding of the FBiH Solidarity Fund, i.e., fulfillment of the Government's legal obligations, and such work must be completed as soon as possible.

"We hope to receive the other BAM 60 million for therapy and health services needed by approximately 1,740 patients currently on waiting lists in FBiH," the Association states. "The ill had to stand up and fight for their rights," they state, upset that they had to do the work of the Fund. The Fund should have pointed out the lack of funds rather than waiting for twenty-one years during which the Government owed money and prevented it from helping severely ill patients.



The associations of patients and beneficiaries of the Solidarity Fund services are clear - they demand funding that will help abolish waiting lists for the severely ill in FBiH. They want to end the unacceptable practice where people and their families, because of the callousness of the authorities, have to engage in public campaigns to raise money for medical treatment. The first test of the Government's commitment to solving this problem will be the draft of the FBiH Budget for 2024, in which the Government will declare its stance on the importance of financing the FBiH Solidarity Fund and the rule of law.

The Law on Health Insurance stipulates that the work of the Fund is financed from contributions for mandatory health insurance, the FBiH Budget, and other revenues. This Law prescribes the Government's obligation to determine the percentage of compulsory allocation of funding for the work of the Solidarity Fund for each calendar year, based on the proposal of the Health Ministry, from the total collected contributions for mandatory health insurance in the Federation of Bosnia and Herzegovina. The same Law obligates the Government to fund the work of the Solidarity Fund from the FBiH Budget - in the amount identical to the funds provided on the basis of contributions for mandatory health insurance! However, since the formation of the FBiH Solidarity Fund in 2002, the Government has never fully complied with this obligation, which directly affected the ability of the Fund to provide appropriate service to the citizens and patients. The violation of the Law created waiting lists for seriously ill patients, making it impossible for them to exercise their right to health care. As of September 30, 2023, more than 1,740 patients eligible for the right to treatment through the FBiH Solidarity Fund cannot realize their right solely due to the lack of funds in the Fund.





## **A NEW VICTORY FOR THE CITIZENS OF JABLANICA - THE COURT ANNULS THE PERMIT FOR THE OPERATION OF THE MHP “ZLATE,” AND FERK REJECTS THE INVESTOR’S APPLICATION FOR A PERMIT**

The citizens’ association “For Doljanka” from Jablanica won a great victory in its fight to protect the river Doljanka. The latest verdict of the Cantonal Court in Mostar annuls the license for the operation of the “Zlate” power plant in Jablanica, and the Regulatory Commission for Energy in the Federation of Bosnia and Herzegovina (FERK) has rejected the application filed by EKO-VAT d.o.o. Jablanica for a license for the production of electricity and the status of qualified producer. FERK finally followed the law, which resulted from a long-term legal battle of the Association of Citizens “For Doljanka.” At the end of 2020, the Association initiated an administrative action against FERK’s Decision to grant a license to the company “EKO-VAT” d.o.o. Jablanica. In the explanation of its verdict, the Cantonal Court in Mostar pointed out exactly those violations the Association pointed out to FERK and other institutions. In its fight to protect the river, the Association has won six verdicts, and institutions have less and less space to circumvent the laws. Moreover, the permit for the MHP “Zlate” operation has finally been canceled after numerous attempts to legalize the operation by disregarding laws.

Activists say that they responded to responsible, unscrupulous, and often corrupt individuals representing institutions at all levels of government in Bosnia and Herzegovina, that they will continue their fight, and that every verdict in their favor means wind in their backs. After this verdict, they are contemplating filing criminal charges against FERK. “As time passes, we are increasingly aware of the magnitude of the problem we are dealing with, but we will not give up. Once we have exhausted all legal remedies in Bosnia and Herzegovina, we are prepared to initiate proceedings before international courts. Especially now, when the six court rulings confirm and substantiate our doubts and claims.”

Every verdict is a triumph for the Association and a step closer to preserving the Doljanka River; however, a few more steps remain before achieving a complete victory. The “Zlate” MHP Zlate still has a building permit, but a lawsuit has been filed against it, and it is expected that the outcome will also favor the citizens.

What is certain is that the Association illuminated the road to justice. Numerous illegalities tested the group’s commitment, and, at one time, it all seemed like a battle with windmills. Nevertheless, verdict after verdict and victory after victory brought the group closer to the future in which the river Doljanka remains untouched for generations to come. The group’s fight continues, and a few steps remain on the way to complete victory. The activists remain ready for any challenge.





## CONSTRUCTION OF A HOSPITAL ON AGRICULTURAL LAND MISSING A BUILDING PERMIT AND IN CONFLICT WITH THE LAWS AND THE WILL OF THE CITIZENS SUSPENDED AFTER ACTIVISTS FILE A REPORT

The Republika Srpska Building Inspector announced the halt of construction works in Pridvorci in Trebinje following a request for urgent inspection filed by the Movement for Restitution Trebinje. According to the available information, the report says that “in the construction diary of July 20, 2023, the “supervisory body” (Directorate for Reconstruction and Construction of Republika Srpska), in line with its powers, issued a stop work order on the building that does not comply with the construction permit for preparatory works.”

For more than two years, citizens of Trebinje have been protesting against irregularities in connection with the construction taking place on agricultural land in the City of Trebinje. Because of violation of the law and non-compliance with procedures, they initiated two criminal charges and an appeal to the Constitutional Court of Bosnia and Herzegovina. In the meantime, the group has received a decision from the Republika Srpska Constitutional Court challenging the decision of the City of Trebinje on the subdivision and sale of agricultural land in another location and establishing that the decision of the City of Trebinje is unconstitutional in that case. In addition, the citizens of Trebinje filed a lawsuit against the RS Ministry of Spatial Planning, Construction, and Ecology for committing a series of irregularities in the permitting of temporary construction works on agricultural land in the Pridvorci community in Trebinje.

In the lawsuit, the citizens point out that the Ministry has issued a construction permit for temporary construction works, even though the law requires that preparatory works be carried out based on a construction permit. Following inspection, the construction works were suspended, awaiting a building permit. However, a partial decision was soon issued granting a building permit where many irregularities were observed. The group is preparing a lawsuit against that document. The construction works have resumed based on that partial decision. But the citizens will not give up. They claim they will use all legal remedies to achieve their goal and will not allow construction on agricultural land.



## **ACTIVISTS' ACTIONS YIELD RESULTS: PROOF THAT THE VOICE OF CITIZENS STILL COUNTS**

Activists fighting for the legal and controlled exploitation of gravel in Republika Srpska have won several victories, and their persistence and regular monitoring of the situation brought concrete results. The first success story comes from Polum near Bratunac, where the locals protested the planned start of gravel mining on the Drina River. The locals sent a report to the Republika Srpska Administration for Inspection Affairs because the contractor did not have documentation proving resolved property relations. Although the contractor had concluded a contract with the Vode Srpske company for the maintenance of riverbeds, dislocation, and extraction of materials, the unresolved issues of access roads and locations for material disposal and the protests of the locals resulted in the supervisory authority ordering the halt of all further work at this location.

After Bratunac, positive news also came from Doboj. The Department for Inspection Affairs of the City of Doboj has issued a decision on the removal of illegally built buildings along the Bosna riverbed because the investor does not have a building permit. In addition, the Department banned any construction works on the site and ordered that everything be returned to its original state. The buildings in question occupy an area of 760 square meters and a supporting reinforced wall 70 meters long.

Next is Zvornik, where the police and the Prosecutor's Office responded to numerous complaints from activists. In Šepko near Zvornik, the gravel miners have decided to circumvent the law and do not perform the works according to the issued consents and contracts. Members of the Zvornik Police Department and members of the Criminal Police Department of the RS Ministry of Interior, under the supervision of the District Public Prosecutor's Office in Bijeljina, took measures to prevent the illegal exploitation of gravel and sand.

Activists have shown that irregularities can be stopped, and positive changes can be created if there is persistence. They call on all citizens to join them in raising their voices against the illegal destruction of water resources, endangering people's lives, and putting the interests of individuals before the interests of the community.



## **TIGHTER PENALTIES AND MORE RESPONSIBILITY OF COMPETENT INSTITUTIONS ARE NECESSARY TO IMPROVE WATERCOURSE MANAGEMENT**

Activists who advocate for the legal and controlled exploitation of gravel in the Federation of Bosnia and Herzegovina (FBiH) have joined forces to advocate for systemic solutions and changes to solve this long-standing problem.

In late September, an initiative was filed with the FBiH Ministry of Agriculture, Water Management, and Forestry, demanding that the new FBiH Law on Waters and implementing regulations introduce amendments and tighter penal provisions for the extraction and exploitation of river material.

Past practice has shown that perpetrators of misdemeanor offenses get minimum sentences, which do not deter them from committing the same or similar offense again.

In addition, when imposing fines, chief inspectors issue misdemeanor orders that set a minimum fine. In contrast, to impose larger fines, it is necessary to initiate misdemeanor proceedings before the competent court, which the competent inspectorates rarely do.

The submitted initiative proposes positive changes i.e., that new penalties should be included in the penal provisions for offenses committed by legal entities to prohibit gravel mining in the restricted area less than 100 meters from the outer part of the embankment and to sanction gravel mining that is contrary to the prescribed water act or that is being carried out without a water act. It was proposed that the fines for legal entities increase - the legal minimums should be at least doubled, and the legal maximums should be harmonized with the provisions of the FBiH Law on Offences that allow for fines up to 200,000.00 KM. Regarding fines for natural persons, the initiative proposes a range from 2,000.00 to 20,000.00 KM.

Besides the flawed sanction process and minimal fines, the problem is also the lack of responsibility on the part of the competent institutions, which is a direct consequence of the absence of punitive legal measures for irresponsible behavior. The initiative proposes the introduction of sanctions for persons in institutions, which would improve and align their practices with the obligations and responsibilities emanating from the law.



**STOP**  
NEAKREDITOVANIM  
VISOKOSKOLSKIM  
USTANOVAMA

## **STUDENT ACTIVISTS PROTECT THE RIGHTS OF STUDENTS - AN APPEAL TO THE EDUCATION INSPECTORATE!**

Student activists from the informal group of students “Accredited Higher Education Institutions - Recognized Degrees” have been pointing out problems with the accreditation of higher education institutions in the Republika Srpska for more than two years. They protect students’ rights and promote compliance with legal regulations. Even though the Prijedor University of Economics and Informatics has been prohibited from operating after the rejection of its application for accreditation for Public Administration studies, this university continued to enroll students for regular studies for the academic year 2023/2024. The only exception was the Public Administration Study Program, where no enrollments occurred. Having learned that it is a matter of disregarding the Decision of the Republika Srpska Agency for Higher Education of March 17, 2023, the activists decided to turn to the Education Inspectorate and request an extraordinary inspection.

The reason for the direct address was the potential violation of the rights of students who intended to choose the university for their further education. A direct consequence of such enrollments would be the impossibility of obtaining a valid degree because Prijedor College lost the possibility of providing education to students. Although there is an obligation to ensure further continuation and completion of education for students already studying at this Higher Education Institution, this is not possible through classes at this Higher Education Institution.

On July 18, 2023, the activists filed their first request with the Republika Srpska Administration for Inspection Affairs. Because of the importance of protecting students’ rights, the activists sent a reminder on September 21, 2023, calling for immediate action and inspection of the University of Prijedor. On September 28, 2023, the Republika Srpska Administration for Inspection Affairs, Sector of Inspection for Education and Sports, Department of Banja Luka, officially confirmed that this college cannot enroll students and conduct classes. The Administration imposed work ban measures on the Prijedor College of Economics and Informatics.

The activities of student activists resulted in success because students are looking for both knowledge and recognized degrees.

[More on antikorupcija.info](https://antikorupcija.info)



## **MORE THAN 800 SANSKI MOST RESIDENTS SIGNED A PETITION AGAINST COAL MINING, CALLING ON SANSKI MOST MUNICIPALITY TO URGENTLY IMPLEMENT MEASURES TO PROTECT THE CITIZENS**

“Life on Coal” is a civic initiative against coal mining in Sanski Most, threatening the environment and the lives of citizens in this municipality. The group filed a petition with the Municipal Administration containing more than 800 signatures from citizens demanding an immediate response to solve the challenges faced by the residents of this municipality.

By signing the petition, the citizens demand actions to address problems arising from coal exploitation, such as soil and air pollution, threats to dairy production and animal husbandry, destruction of residents’ private plots, disruption of residents’ daily activities, and impact on the overall quality of life.

The problem emerged after the Decision on the transfer of the concession to a private company from Posušje without the consent of the original concession holder “Kamengrad Mine,” which is why the Supreme Court of FBiH annulled the Decision and referred the case back to the competent Ministry for further processing.

The group demands that competent cantonal and FBiH authorities find a solution to this problem as soon as possible and implement measures to protect the interests of the citizens of Sanski Most. In addition, the FBiH Ministry of Energy and Mining must act according to the Decision of the Supreme Court of FBiH in connection with adopting the Decision on the transfer of the concession. The group also demands a faster response from competent inspection authorities.



## Activists from Bugojno Patiently Wait for a Ruling: Is the end to the problems of the Poriče residents in sight?

Civic activists from Poriče in Bugojno continue their fight against a quarry in their neighborhood; they monitor the status of criminal charges and hope the verdict will be passed soon in their favor. The activists filed criminal charges with the Central Bosnia Canton Prosecutor's Office against the mayor of Bugojno municipality, the Head of the Department for the Economy, other responsible persons in the Bugojno Municipal Council, and four members of the Local Community Council on the grounds of suspicion that they had favored the investor and acted outside the scope of their official positions by issuing the Decision to grant a preliminary consent for the opening of a quarry in the Poriče community.

“We don't know what the decision will be, but we hope that it will be in favor of the locals because we are sure that the evidence submitted to the prosecutor's office is sufficient to revoke the Municipal Council's decision on granting consent to the investor without any submitted documentation, sketch or blueprint, a plan, a project proposal or anything like that,” the activists point out. Activists do not give up on their goal to defend their houses and neighbors from investors, who still, according to the information they receive from institutions, have not received a single permit and cannot legally obtain one. However, they point out that the situation on the ground is changing and that they notice the growing nervousness of investors and those supporting them and trying to quell the protests of the locals through intimidation.

“They are not used to someone opposing them, standing in the way of their arrogance and the government's lack of concern for citizens. They send us threats, open mail, spread stories about how someone is financing us and do everything to make our lives miserable,” the activists added. Activists continue their struggle. In addition to hoping for an imminent verdict, they are also patiently waiting for a session of the Municipal Council, which has not been held for months, to put the controversial Decision out of force and start the procedure for revocation of the concession contract for the Bukovački potok in Poriče.



## **CITIZENS OF SARAJEVO PERSIST IN THEIR DEMANDS - THEY ASK FOR A DECISION TO STOP ILLEGAL CONSTRUCTION ON BJELAŠNICA AND IGMAN**

The citizens of Sarajevo are not giving up their fight against illegal construction in Bjelašnica and Igman. The informal group of citizens called “We Want Drinking Water and Clean Air - AGAINST Illegal Construction on Bjelašnica and Igman” protests uncontrolled construction and ecocide on the Olympic mountains and has gained considerable support from citizens in a very short time. The group organized a protest in front of the Sarajevo Canton building to call on the cantonal authorities to stop illegal construction in the area. The gathered citizens called on the cantonal authorities not to allow the city of Sarajevo to lose drinking water and clean air!

“In this way, we wanted to draw the public’s attention to the fact that if this type of construction on Bjelašnica and Igman does not stop, there is a great chance that Sarajevo will lose drinking water and clean air. The FBiH Spatial Plan provides the highest degree of protection for the mountains Igman and Bjelašnica; however, since 2004, massive construction of residential buildings and apartments and impermissible clearance of forests have taken place on these mountains. Despite all the rules and regulations for construction, water protection zones, and wastewater, a reckless violation of all procedures occurs. The Office for Combating Corruption and Quality Management of the Canton of Sarajevo observed irregularities in permits for forest clearing and building permits and filed a criminal charge with the Cantonal Prosecutor’s Office in Sarajevo for forest clearing in four cases, and building permits issued for thirteen facilities. “It is because of all this that we are asking for an immediate reaction from the authorities,” the representatives of the informal group say in their statement.

In addition, the group has launched a petition calling on the authorities to stop further illegal construction and destruction of nature on Bjelašnica and Igman because construction on these Olympic mountains is not in accordance with the applicable regulation, i.e., the 1987 Decision on the Protection of Drinking Water Sources. The citizens of Sarajevo use every opportunity to draw attention to the importance of the problem of uncontrolled construction and urbicide on Bjelašnica and Igman and demand action.

## REPORTED CORRUPTION IN CENTRAL BOSNIA CANTON

In the Central Bosnian Canton, a series of meetings have taken place with the residents of Kordići to claim that illegal logging is taking place in this area. Five sawmills have been reported to the competent authorities demanding investigations, and we are still waiting for the response. Visuals for the campaign were also prepared, and a billboard was placed in Bugojno.



## JURIČIĆ: VIEWS OF THE PEOPLE OF PROZOR/RAMA MUNICIPALITY WILL BE RESPECTED WHEN ISSUING ENVIRONMENTAL PERMITS

The river Volujak or Volujčiča, as some call it, is located in the eastern parts of the Municipality of Prozor/Rama. It originates from several sources under Gorača and Divan Mountain. It is about 19 kilometers long and forms a canyon that is sometimes over 600 meters deep.

It is rich in brook trout and crayfish, which live only in clean water and are on the IUCN red list of threatened species. That is why it is unsurprising that the Volujak is the most pristine river in the Rama region. Therefore, constructing a mini hydropower plant on its course would be an environmental disaster. The Aarhus Center in Bosnia and Herzegovina submitted a request to terminate the contract in question or revoke the concession for the Volujak plant. In a conversation on this topic, the mayor of Prozor-Rama Municipality, Josip Juričić, pointed out:

In our June 2, 2023 letter, we explained our positions related to the concession. The Municipality of Prozor-Rama, as a concessionaire and a signatory to the Concession Agreement, will not undertake any actions that may cause harm to the Municipality. We follow the regulations in this area and take actions that we consider correct. We note that the new legal solutions, which you also mentioned, set August 2025 as the deadline for concessionaires to obtain an electric power permit, and the actions that must precede are obtaining various permits in procedures in which the public, especially the locals living in the vicinity of the territory of the concession, must be involved. After August 2025, those who do not obtain permits in accordance with the law will remain without concessions. Unilateral termination of the contract could be a hasty act, and the concessionaire could use it to claim some compensation, which is not in our interest... (but) we will, in our discussions with the FBiH Minister of Environment and Tourism, adhere to our principles, and will explicitly insist on the need to respect the views of the local population.“





## **THE AARHUS CENTER IN BIH AND ZELENİ NERETVA SAY: DEFENDING NERETVICA MEANS THE WIND IN OUR BACK FOR NEW LEGAL BATTLES AND VICTORIES**

The official confirmation by Elektroprivreda BiH that the 2009 MHP Concession Contract on Neretvica has been terminated is the result of the persistent and dedicated work of the Aarhus Center, the “Zeleni Neretva” Association and, of course, residents, especially those from the Association “Let me flow! Neretvica,” who directly participated in this legal process. That’s why the victory belongs to this team. Neretvica is an example of everything being possible with persistence and commitment. That’s why we continue to fight for the Ljuta River, where they also want to build mini-hydroelectric plants that would destroy some of the world’s endemic river animal species. Legal adviser of the Aarhus Center in Bosnia and Herzegovina, Nina Kreševljaković, and the president of the Association for Environmental Protection “Zeleni Neretva,” Amir Variščić, commented on this victory:

*Nina: “Passing by Neretvica, which symbolizes our resistance, gives me extra strength and courage to continue even stronger and bolder. We managed to defend the river from Elektroprivreda, from the state. Such success gives us hope that dealing with private investors will be even easier; it’s just important to stay persistent. The fight for the Ljuta has been going on for over a decade, but I think we are currently at a stage where we can say with certainty that we will save this river as well. The investor’s permits expired long ago, and the works have not officially commenced. Unfortunately, the concession contract is still in force, but we will do our best to make it a thing of the past. Currently, the investor for the small hydropower plants “Lakavica usce” and “Palež” legally cannot extend the building permit or urban planning consent because they were already extended once, and the works have not begun, which means that all legal possibilities for the realization of this project have been exhausted. Construction permits are still pending for the other planned small hydroelectric power plants on the Ljuta River.”*

*Amir: “Foreign companies conduct themselves differently here than in their home countries. We have seen this in various examples, and the cases of Neretvica and Ljuta demonstrate this. Regarding Neretvica, where the concessionaire is the domestic public company EPBiH, it was much easier to get concrete information, and the whole project was still much more transparent than the case with Ljuta. The Slovenian company, the concessionaire for the construction of the MHP on Ljuta, behaved irresponsibly and non-transparently, and that privilege is generally given to private companies by politicians. In addition, private companies often “play dirty,” and the authorities determine the limits to which they can go. That is what it is like all over the world, and that is what it is like here. Today, we have a similar situation with Ljuta, where the public needs real information about what is happening with the MHE project. The concession contract (as well as the related annexes) has expired, the Slovenian concessionaire is in bankruptcy, and the administration of the City of Konjic, for reasons unknown to us, is still not saying anything about this case.”*

# THE FIGHT AGAINST CORRUPTION IN MATERNITY HOSPITALS

Based on the experiences that women shared with us, which include the names and surnames of doctors and medical staff who are linked to inhumane, illegal, corrupt, and unethical treatment of women in labor, often with very painful and sometimes tragic outcomes, we filed a criminal charge with the Cantonal Prosecutor's Office of Zenica-Doboj Canton so that investigations can be carried out and those responsible adequately sanctioned. We clearly state that such behavior is unacceptable and will be sanctioned. It is the only way to stop such practices and to finally take responsibility for everything wrong that has happened so far.

The criminal charge for criminal acts of corruption and malpractice has been filed against the doctors and staff of the Zenica Cantonal Hospital, based on the names listed in 52 birth experiences.

On this occasion, the Association "BABY STEPS" organized a press conference on Thursday, September 21, 2023 in Sarajevo. Five TV channels and many journalists from print and online media attended the press conference. The Association was represented by Amila Tatarević, president of the Association, and associate Samir Forić, assistant professor at the Department of Sociology at the Faculty of Political Sciences in Sarajevo.





## **AN INITIATIVE WAS LAUNCHED IN WEST HERZEGOVINA CANTON TO CHANGE THE LEGISLATIVE FRAMEWORK ON EMPLOYMENT IN THE PUBLIC SECTOR**

The Center for Civic Cooperation from Livno held a press conference and presented the Analysis of the legislative framework in the field of employment in the public sector in West Herzegovina Canton/Canton 8, - Results of the monitoring of corruption in the field of employment in the public sector. The press conference held on September 27 in Široki Brijeg gathered representatives of the cantonal authorities, institutions, political parties, and other interested citizens and presented the results of the monitoring and analysis of the legislative framework in the field of employment in the public sector. After the presentation, letters were drawn up asking the legislative authority to support the campaign and the effort to implement the recommendations into the legislative framework in the field of employment in the public sector of West Herzegovina Canton/C8. In addition to the above, the Center for Civic Cooperation from Livno implemented four informative street actions from October 17-20, 2023, in Ljubuški, Široki Brijeg, Grude, and Posušje. At the street actions, citizens had the opportunity to express their support for the initiative to change the legislative framework for employment in the public sector of West Herzegovina/C8.

The street actions aimed to inform the population of West Herzegovina County/Canton 8 about the research findings. Volunteers also distributed promotional material explaining the shortcomings of the legislative framework and recommendations. The Center for Civic Cooperation carried out the research and analysis with the support of legal experts and analysts. All interested citizens from West Herzegovina Canton/C8 had the opportunity to find out more information about the legislative framework for employment in the public sector and about the necessary changes that decision-makers should implement in the coming period so that all residents have the opportunity for equal and transparent application and employment in the public sector in this area of BiH. By implementing activities within the project “Supporting the Involvement of Citizens of Cantons 8 and 10 in the Fight against Corruption in Employment in the Public Sector,” the aim is to encourage the active participation of citizens in detecting and solving specific problems related to corruption, nepotism, and hiring along political lines. The street actions were successful, and the residents of the canton were informed about the subject matter. The greatest interest was among citizens in Grude and the weakest in Ljubuški. Citizens are invited to report employment irregularities, and interested persons are informed that they can contact the Center for Civic Cooperation if they are experiencing problems and if their labor rights are reduced or threatened.



## RIGHT TO ACTIVISM

The Helsinki Citizens' Assembly Banjaluka is implementing the "Right to Activism" campaign with one essential goal: to improve the image and perception of civil society organizations in public and among citizens and stop the further shrinking of space for civil society, especially having in mind the recent adoption of the disputed Draft Law on the Special Register and Transparency of the Work of Non-Governmental Organizations and its direct targeting of certain NGOs. Also, this campaign aims to create a stimulating environment in which civil society organizations will be recognized as credible stakeholders in the protection of human rights, the fight against corruption, and the promotion of democracy. The campaign promotes messages showing that civil society organizations' representatives are not domestic traitors but fighters for various rights and against violence.

Accordingly, the conference "Civil Society in Republika Srpska - Challenges and Perspectives" was held in Banja Luka on September 22 and 23. The conference brought together representatives of civil society organizations to discuss in one place the state of society, especially in the civil sector, in light of the changes to the Criminal Code and the adoption of the Draft Law on a Special Register and Transparency of the Work of Non-Profit Organizations. The participants shared the experiences of their organizations in these challenging and, by all means, difficult times, from the pandemic to the adoption of restrictive laws. They agreed that the draft law should be withdrawn entirely because of its controversialities - it is discriminatory, and it continues the repressive pressure on civil society organizations.

Additionally, at the protest gathering at Trg Krajine in Banja Luka on October 24, and before the public discussion about the so-called "Draft Law on NGOs," it was pointed out that such a law makes absolutely no sense and that the government wants to create additional pressure and make it more difficult for civil society organizations to operate and do their work. Protesters demanded the withdrawal of the disputed Draft Law from the procedure. The protest walk was announced for that day, but the police banned it; however, a gathering was allowed where civil sector representatives reiterated their opposition to the unconstitutional and disputed Draft Law.



## **BURA INFO HOLDS A ROUND TABLE CONFERENCE: UNORGANIZED PARKING AND PLACES THAT DON'T EXIST ARE FOR SALE IN MOSTAR**

The Association “Bura Info” organized a public debate on the topic “How to solve the issue of charging for neighborhood parking in Mostar?” within the project “Let’s Return Usurped Parking to Citizens.” Mario Ćosić from Bura info points out that no city in the Federation of Bosnia and Herzegovina implements neighborhood parking charges. “We are not against charging for street parking. That is necessary for the City. However, citizens have used space around buildings for 50 years, and we believe that it is inappropriate and antisocial to hit them in their wallets. At the BiH level, there is currently no such charge. We believe that the legal successor of the land around the buildings is the state and not the City of Mostar, which the Court will ultimately determine.” When asked about the fact that citizens pay for parking that no one guarantees, Ćosić said: “No one guarantees us a parking space when we pay for parking. That’s the first problem. The second problem is that courtyards around the buildings have been tended to by the tenants. Who will take over now? Who will be doing that now? Whose are the courtyards now? What are the obligations of the City of Mostar? So non-transparent”. City councilor Silvio Bubalo points out that the decision has been wrong from the beginning and that the problems are overpriced ticket prices and discrimination against citizens. “The decision has been wrong from the beginning, and I tried to warn about it. First of all, neighborhood parking is not a good way to introduce this decision for a simple reason: nowhere in the Federation of Bosnia and Herzegovina is it charged except in Mostar. Second, it is too expensive. My residence is in Bijeli Brijeg, and the ticket costs 360 KM. That is too much for me. Every person who lives in Mostar should be able to buy a ticket at an affordable price. Lawyer Milenko Krčum tells the media more about the lawsuits and legal actions. “My lawsuit is based on the right of servitude. The lawsuit is limited in terms of the subject matter and the manner of discussion. It will only be discussed whether there is interference with the right of servitude. The Association refers to something completely different. The Association’s legal argument is that the City does not ensure the participation of thousands of citizens at the earliest stage of decision-making in matters related to the environment. I believe that the issue of organizing the activities of a public parking lot, i.e., under the balcony for tenants, is a matter of importance for the environment. The Aarhus Convention, which all countries have signed, including BiH, to ensure the participation of the interested public and local communities at the earliest stage of decision-making in matters of environmental importance, to ensure access to information, which is not problematic now, and to ensure access to the Court. Unfortunately, the legal order of BiH is not in harmony with the acquis of the Council of Europe, so it is impossible to initiate an administrative dispute against the decision of a collective body, the representative body of the local self-government unit of the City,” Krčum said.



### » IRINA LOVRIĆ: HYPOCRISY OF BIH MINISTER OF SECURITY NENAD NEŠIĆ «

Irina Lovrić, the first person in BiH to have been granted the status of a protected whistleblower by the Agency for Prevention of Corruption and Coordination of the Fight Against Corruption (APIK) in accordance with the Law on the Protection of Persons Who Report Corruption in the Institutions of Bosnia and Herzegovina, and who despite her status was still exposed to mental and physical abuse, reacted to the statements of the Minister of Security of Bosnia and Herzegovina, Nenad Nešić, regarding the crime committed in Gradačac, reminding him of his rewarding of convicted abusers of women. Her open letter is available in its entirety.

For more, please visit [www.antikorupcija.info](http://www.antikorupcija.info)



### » ALIFAKOVAC TENANTS FILE A CRIMINAL CHARGE AGAINST RESPONSIBLE PERSONS IN THE MUNICIPALITY OF STARI GRAD «

The informal group of citizens “Zgrada,” (Building), which has been fighting for a long time against illegal construction in the Old Town of Sarajevo, filed a report with the Cantonal Prosecutor’s Office in Sarajevo against the competent authorities of the Municipality of Stari Grad Sarajevo for committing a criminal offense and suspicion of abuse of position and other criminal offenses prescribed by the FBiH Criminal Code. The group published a press release.

For more, please visit [www.antikorupcija.info](http://www.antikorupcija.info)

### » WHAT IS IT ABOUT CHIEF PROSECUTORS OF THE STATE PROSECUTOR’S OFFICE - CAN THEY COMPLY WITH THE REGULATIONS AND SEE THE END OF THEIR TERMS WITHOUT BEING EITHER DISMISSED OR UNDERGOING JUDICIAL OR DISCIPLINARY PROCESS?«

It is simply unbelievable that the chief prosecutors in this country cannot comply with the regulations and that, for this reason, since the establishment of the Prosecutor’s Office of Bosnia and Herzegovina in January 2003, none of them completed their terms without being engaged in various scandals and controversies, dismissed, and investigated by prosecutor’s office, which they themselves headed until recently, or by the Court of Bosnia and Herzegovina. It seems that the same fate is in store for the current chief prosecutor, Milanko Kajganić, against whom Transparency International recently filed a report with the Office of the Disciplinary Prosecutor for disregarding regulations aimed at reducing the risk of corruption, which also led to the dismissal of his predecessor. Transparency International published a press release.



# PRATIMO TENDERE

## PRATIMO TENDERE IDENTIFIES RISKS IN PUBLIC PROCUREMENTS

The Pratimo Tendere portal continuously monitors public procurement. During July - September 2023, the portal's monitoring network collected and published data on 976 public procurement procedures, which brought the total number of monitored procurements in the last year (October 1, 2022 - September 30, 2023) to 3125 procedures with a total value of 558.67 million KM (excluding VAT). The table below shows identified corruption risks.

### 3125 MONITORED PUBLIC PROCUREMENTS (PP)



**LOW RISK**

**716 PP**

**23% PP**



**MEDIUM RISK**

**1460 PP**

**47% PP**



**HIGH RISK**

**949 PP**

**30% PP**

### 558.679.004,51 BAM (EXCLUDING VAT)

VALUE OF MONITORED PUBLIC PROCUREMENTS



**LOW RISK**

**40.699.604,05 KM**

**7,28%**



**MEDIUM RISK**

**364.098.568,38 KM**

**65,17%**



**HIGH RISK**

**153.880.832,08 KM**

**27,54 %**

# PUBLIC CALL FOR VOLUNTEERS FOR ANTI-CORRUPTION MONITORING OF PUBLIC PROCUREMENT

Over 70 young people from Bosnia and Herzegovina have participated in the anti-corruption monitoring of public procurement. The recruitment call is open permanently, allowing volunteers to apply throughout the year. The Pratimo Tendere portal also published a public call for volunteers in September 2023.

## Track tenders, track your money!


**Web:** [www.pratimotendere.ba](http://www.pratimotendere.ba)

**Facebook:** <https://www.facebook.com/pratimotendere.ba/>

**Instagram:** <https://www.instagram.com/pratimotendere.ba/>

**Twitter:** <https://twitter.com/PratimotendereB>

## JAVNI POZIV VOLONTERIMA ZA UČEŠĆE U BORBI PROTIV KORUPCIJE U JAVNIM NABAVKAMA



---

**Nudimo vam:**

- edukaciju u oblasti monitoringa javnih nabavki
- mogućnost sticanja iskustva u antikorupcijskom aktivizmu
- izgradnju sopstvenih kapaciteta
- rad u stimulativnom okruženju
- podršku u učenju i savladavanju izazova
- potvrdu o stečenom iskustvu

**Od vas očekujemo:**

- da ste u dobi od 18 do 30 godina
- da ste ambiciozna osoba spremna na učenje
- da ste spremni aktivno učestvovati u borbi protiv korupcije
- da ste otvoreni za sticanje novih iskustava
- da ste spremni savjesno i odgovorno realizovati preuzete zadatke

CV i pismo namjere pošaljite na





## ANTI-CORRUPTION ACTIVITIES OF TRANSPARENCY INTERNATIONAL BIH

- Aleksandar Milješić, Acting Head of the Department for Culture, International Cooperation, Sports, and Non-Governmental Organizations in Prijedor, resigned from his post as a councilor in the Prijedor City Assembly after Transparency International BiH reported him to the competent Ministry for performing several incompatible functions. Milješić submitted the decision on terminating his mandate to the City Assembly, which the Central Election Commission confirmed on June 26, 2023.
- The Appeals Commission of the Republika Srpska annulled the decision of the Commission for the Determination of Conflict of Interest, establishing that the former adviser to Željka Cvijanović and former minister in the Government of the RS Slobodan Župljanin was not in a conflict of interest. The Commission's decision follows an appeal by Transparency International in BiH against the decision of the Commission for the Determination of Conflict of Interest, which released Župljanin from responsibility for violating the law with the explanation that the procedure could not be carried out because he no longer performed the function of an advisor.
- Transparency International in Bosnia and Herzegovina won a second lawsuit against the Ministry of Transport and Communications of the Republika Srpska due to the illegal concealment of the concession contract for the construction of the Banjaluka-Prijedor Highway concluded in 2018 with the Chinese company Shandong Hi-Speed International (SDHS). Although in the first verdict, the District Court in Banja Luka clearly states that the public has the right to know the financial conditions under which the project was agreed upon, the Ministry refused to approve access to the contract and issued a new decision that ignores the essence of the court verdict.
- Bosnia and Herzegovina needs an urgent reform of the electoral legislation to strengthen integrity and restore citizens' trust in the electoral process before holding local elections. That is why solving the issues concerning vote count and voter list manipulations, trading seats on election committees, misuse of public resources, and illegal financing of political parties is necessary. These are the key messages of the "Improving Electoral Integrity" conference organized by Transparency International in BiH in July 2023, which also presented the final report of the monitoring of the 2022 election process.
- Transparency International in Bosnia and Herzegovina sent comments to all caucuses in the National Assembly of the Republika Srpska on the Draft Law on the Special Register and Transparency of the Work of Non-Profit Organizations. The proposal to regulate the work of only a number of non-profit organizations, apart from being discriminatory, is not in accordance with the European Convention on Fundamental Human Rights and Freedoms, the Constitution of the Republika Srpska and Bosnia and Herzegovina, and the laws on associations and foundations and the tax procedure of the Republika Srpska.



CENTRI CIVILNIH INICIJATIVA  
ЦЕНТРИ ЦИВИЛНИХ ИНИЦИЈАТИВА

# PUBLIC CALL

**FOR PROJECTS IN THE FIGHT AGAINST CORRUPTION!**

THROUGH YOUR WORK, YOU FIGHT AGAINST  
CORRUPTION IN VARIOUS FIELDS, SUCH  
AS HEALTH, EDUCATION, JUSTICE, ENVIRONMENTAL  
PROTECTION, PUBLIC SPENDING...?

**APPLY FOR A PROJECT!**

Podržano od:



**USAID**  
OD AMERIČKOG NARODA

## CONTINUOUS CALL FOR ANTI-CORRUPTION PROJECTS, CIVIC INITIATIVES AND CAMPAIGNS

The Call for BiH CSOs (associations of citizens and foundations) to submit their project proposals is geared toward fighting corruption and solving specific local-level problems or toward advocacy initiatives addressing the higher government levels.

The applicants are required to submit the application form and other documents, as requested in the application, exclusively via the online application platform available at

<http://tender.protivkorupcije.ba/>



SUPPORTED BY



**USAID**  
OD AMERIČKOG NARODA

This publication is made possible with the support of the American People through the United States Agency for International Development (USAID).  
The contents of this publication are the sole responsibility of the Centers for Civic Initiatives (CCI) and do not necessarily reflect the views of USAID or the United States Government.