



# ASSISTANCE TO CITIZENS IN THE FIGHT AGAINST CORRUPTION PROJECT

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**USAID**  
OD AMERIČKOG NARODA



CENTRI CIVILNIH INICIJATIVA  
CENTRI GRAĐANINSKOG AKTIVIZITETA



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# Project description

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 anti-corruption activities across Bosnia and Herzegovina



Contact them through their FB pages!

Learn more at [antikorupcija.info](http://antikorupcija.info) portal

- Banja Luka**
  - CA "Restart Srpska
  - Union of the Employers' Association of Republika Srpska
  - Association "Think good"
  - CA "Road of Justice"
  - ICG "Save Karanovac"
- Bijeljina**
  - Helsinki Committee for Human Rights
  - ICG "Stop illegal exploitation of gravel in Bijeljina"
- 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"
- 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 "Let's save the Foča rivers"
- Goražde**
  - ICG "Save Drina"
- EastSarajevo**
  - ICG "STOP to the Construction of mHps on the river Kasindolska"
- ŽIR**
  - Women's Interactive Rural Center (ŽIR)
- Jablanica**
  - ICG "For Doljanku"
- Konjic**
  - ICG "Neretvica - Let Me Flow"
- Kreševo**
  - ICG "Stop Quarries Without Permits"
- Livno**
  - CA "the Center for Citizens' Cooperation"
- Maglaj**
  - ICG "For Legal Exploitation of Minerals in the Upper Section of the river Bosna"
- Mostar**
  - CA "Because We Care"
  - ICG "Initiative against the construction of Buna 1 and 2 mHp"
  - ICG "Stop to illegal construction in Bijeli Brijeg"
  - Association of Public Procurement Professionals, Trainers and Officers in BiH (UPTIS)
  - ICG "No to construction on Buna and in my Blagaj"
  - ICG "Citizens' Initiative Kuti"
- Prijedor**
  - Consumer Protection Association "DON Prijedor"
- Sarajevo**
  - ICG "Hastahana park"
  - ICG "Initiative KCUS"
  - ICG "Illegal construction in the municipality of Stari Grad"
  - 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"
- Šipovo**
  - ICG "Farmeri"
- Trebinje**
  - CA "Stop mobbing"
- Trnovo**
  - ICG "Stop to Disposal of Illegal Waste at the Krupačke stijene Waste Dump"
- Tuzla**
  - CA "The Look of Nature"
  - ICG "Initiative against the landfill for slag and ash from the thermal power plant in local community Šićki Brod"
- Višegrad:**
  - ICG "Defend the Rivers of Višegrad"
- Vitez**
  - ICG "Courageous Women of Kruščica"
  - Initiative "Illegality of Spending the Building Maintenance Funds in Vitez"
- Zenica**
  - ICG "Air guards"
  - ICG "Movement for change"
- Zvornik**
  - ICG "STOP to illegal gravel pits on the Drina river"
- Žepče**
  - ICG "Stop illegal exploitation of gravel in the area of Žepče and Zavidovići"
- Tešanj**
  - ICG "Non-transparent spending of budget funds for water supply to citizens"



## Civic activists across BiH marked the International Anti-Corruption Day



On the occasion of the International Anti-Corruption Day, December 9, 2021, the civic activists across Bosnia and Herzegovina had taken their activities to the streets and reminded the public of illegal activities and irregularities they are fighting against in their local communities by holding press conferences, distributing leaflets and launching petitions. This day was also marked by those civic activists who are pushing the very limits of their fight, annulling illegal permits, demolishing floors of illegally built buildings and walls, stopping investors from destroying natural resources, and changing legislation. It is on that day that all of them, symbolically, had invited all the citizens to join them in the fight against corruption and to fight irregularities in their local communities together. They also sent a unique message to the citizens of Bosnia and Herzegovina that all those fighting unlawfulness and irregularities in their local communities can succeed in the fight against corruption by raising their voice. They said: “We will end lawlessness by perseverance!”



*“We have demonstrated our power – after years of warning that Kotorsko near Doboј stores enormous amounts of dangerous chemicals without any security, as many as 40 tons of hexane have finally been removed from this community.”*

Mehmed Trnjanin, IGC “Remove Hexane from Kotorsko”, Doboј

*“Unaccredited higher education institutions have for years created more barriers than open doors for their students. Our activism and public campaign successfully point out the problems in higher education and encourage better inspection and control.”*

Nevena Rodić, IGC “Stop Unaccredited Universities”, Doboј





*“I can say freely – if we had not been there to pressure the competent inspection authorities to stop illegal and uncontrolled extraction of gravel from the Bosna River and if the inspection had not responded to our reports, the extraction would have continued at the same or higher rate.”*

Zumra Gušo, IGC “Stop Illegal Gravel Extraction in Maglaj”, Maglaj

*“The operation of the Planina quarry has been affecting our health and homes for years. Now when this issue is raised again, our fight is our activism against a threat to our natural rights. We will not allow the institutions to put the economic interests of some private companies before our lives!”*

Aleksandar Novaković, IGC “Stop Blasting Explosives in Karanovac”, Banja Luka



*“The illegal construction of small hydroelectric dams would have continued unnoticed if it had not been for our fight. Don’t permit illegal construction on our rivers!”*

Naza Spahić, IGC “For Doljanka”, Jablanica

*“Fifteen small dams would have been built despite the irregularities and evident violations of legislation, if it had not been for the courage and determination of the residents of the Neretvica valley. There is no stronger force than that of a man and their courage to fight against anarchy.”*

Ibrahim Turak, IGC “Let Me Flow – Neretvica”, Konjic



*“If it had not been for us, another illegal building would have been built next to this building in Bijeli Brijeg in Mostar. Do not permit illegal building in your local community!”*

Mario Ćosić, IGC “Stop Illegal Building in Bijeli Brijeg”, Mostar



*“Thanks to our fight, a solution for the illegal Uborak waste dump will have to be found. You and your fight can make a difference.”*

Omer Hujdur, IGC “Because We Care – Uborak”, Mostar

*“We persist in our fight against the irregularities and procedural errors found in the construction of three small dams on the Kasindolska River. All three environmental permits for the construction of the dams on the Kasindolska River were revoked due to legal actions and strong civic activism.”*

Sara Tuševljak, IGC “Stop Construction of Small Hydroelectric Dams on the Kasindolska River”, East Sarajevo



*“If Goražde citizens had not raised their voices against numerous irregularities, building a wall more than two meters high would have continued, and we, the residents of the Luka community, would have been separated from our Drina River, the symbol of this town.”*

Dženis Ćulov, IGC “Save the Drina River”, Goražde



# BUILDING PERMIT FOR THE SMALL HYDROPOWER PLANT “ZLATE” ON THE RIVER DOLJANKA REVOKED



The citizens' association “For Doljanka” from Jablanica is running years-long campaign as to put a spotlight on the illegal construction of SHPP Zlata on the river Doljanka. They had used all available means throughout their fight to prove that a number of legal provisions were violated during issuance of the documents necessary for its construction, primarily by the Local Community Council, Jablanica Municipal Council, the mayor of Jablanica municipality, cantonal ministries and ultimately also by the Federation Ministry of Environment and Tourism. The first evidence that the citizens' claims were justified was the ruling of the Sarajevo Cantonal Court that revoked the Environmental permit issued by the Federation Ministry of Environment and Tourism, remitting the case back for reconsideration. The Federation Energy Regulatory Commission (FERC) refused to revoke the operating license for this SHPP after the ruling, and in the meantime, whilst the proceeding was ongoing, the Federation Ministry amended the FBiH Law on Environment Protection as to favor the investor again. A second proceedings was completed in December of 2021, this time before the Mostar County Court, which revoked the building permit issued by the Ministry of Construction of Herzegovina-Neretva Canton, due to a number of irregularities identified in the permits obtaining process. This ruling further fortified the will of activists to persevere in their fight to achieve the goal, even if they had to present their claims before the international courts.



*“The illegal construction of small hydroelectric dams would have continued unnoticed if it had not been for our fight. Don't permit illegal construction on our rivers!”*

Naza Spahić, IGC “For Doljanka”, Jablanica



## Finally – construction of small HPPs on Buna river channels prohibited



The years long fight of the citizens a Mostar suburb, Buna, and the Citizens' Association "The flower of May" has finally been rewarded. The City Council of the City of Mostar adopted a Conclusion removing the small HPPs Buna 1 and Buna 2 from the new Spatial Plan, thus preventing the construction of these small HPPs at the mouth of the Buna River, South of Mostar. It has to be recalled that both Buna 1 and Buna 2 small HPPs were included in the Spatial plan of the City of Mostar, which was adopted at the last session of the previous convocation of the City Council, without having a single session of public discussions held. Although the investor had really tried to provide the necessary documentation, the investor's application for the zoning permit was rejected twice thanks to civic activism and perseverance, and the Court in Sarajevo revoked the environmental permit issued by the Federation Ministry of Environment due to a number of violations of the law made during the documentation issuing process. The conclusion of the Assembly of Herzegovina-Neretva Canton on the review of the concession contract for these small HPPs is now before the Government of Herzegovina-Neretva Canton. In the meantime, the citizens of the entire Mostar are awaiting adoption of a new Spatial Plan in which there will be no small HPPs on the Buna River as well as many other illegally built facilities in the City of Mostar.



## Another win of the civic activists for the Kasindol River!

The District Court in Banja Luka had in December 2021 rendered a ruling revoking the building permit for the small hydropower plant “Samar” on the Kasindol River. According to the ruling, the RS Ministry of Physical Planning, Construction and Ecology has to pass a new administrative act within 30 days, taking due account of the court’s legal understanding and the court’s remarks regarding the procedure. The District Court in Banja Luka upheld the lawsuit of the Aarhus Resource Center in which it was pointed out that the laws were violated, as well as the Constitution of the Republika Srpska, and had thus rendered such a ruling. This was yet another victory of the activists gathered around the informal group of citizens “Stop the construction of small HPPs on the Kasindol River” who have been fighting for years against the construction of three small HPPs on the Kasindol River in Istočno Sarajevo. It has to be mentioned that earlier in 2021 the District Court in Banja Luka had revoked environmental permits for all small hydropower plants: Podivič, Samar and Slapi. The project to build three small hydropower plants on the Kasindol River has been unlawful from the very beginning because the public was not adequately involved and no spatial planning alignment was done, so the time came to face the consequences of circumventing and disrespecting laws and procedures. The example of the Kasindol River shows that strong legal and public action can show the importance of preserving the environment through the fulfillment of all legally prescribed conditions and procedures.



Learn more at [antikorupcija.info](https://antikorupcija.info) portal



## AN OFFICIAL REQUEST TO TERMINATE THE CONCESSION CONTRACT FOR CONSTRUCTION OF A SMALL HPP ON NERETVICA RIVER FILED!

The Service for Physical Planning, Construction and Reconstruction of the Municipality of Konjic had during the summer 2021 rejected the request of the power supply company Elektroprivreda BiH d.d. for issuance of a permit for the construction of the small HPPs Gorovnik Ušće and the small HPP Sirijanski most, explaining that the investor had failed to submit the energy permit within the legally prescribed period! This officially meant that there was no construction of small hydropower plants on the Neretvica River because the investor does not have needed permits to build them. The Citizens' Association "Neretvica - Let me flow", which has been fighting the construction of 15 small hydropower plants

on the Neretvica River for years already, had then filed a criminal report to the Cantonal Prosecutor's Office of Herzegovina-Neretva Canton against the responsible persons in the Konjic Municipality on suspicion of having committed the crime of abuse of office or authorities and negligence of service during the issuance of now already revoked permits. However, courageous and persistent activists from "Let me flow" movement did not give up, and had on December 15, 2021 submitted a request to the municipal administration to cancel/terminate the concession contract for the construction and the use of small hydropower plants in the Neretvica River Basin.

*"The substance of the request is the following: Considering the fact that Article 11 of the Contract reads that Elektroprivreda BiH shall put all 15 small HPPs into commercial operation by the end of 2013 at the latest, and that appropriate annex has not been drafted, paragraph 3 of the aforementioned Article clearly states: "The Concessionaire has the right to terminate this Agreement". We are demanding termination of the contract."*

Ultimately, this would mean an official end to the project of building 15 small hydropower plants on the Neretvica River, something that activists and Konjic residents hope will happen.



*"It is theirs to try, and ours not to cave in and we guarantee that they will not get it,"*

**Vejsil Hondo, Konjic.**



## THE CASE OF UNLAWFUL OPERATION OF A QUARRY AND A LIME FACTORY IN KREŠEVO TURNED OVER TO THE PROSECUTOR'S OFFICE!

The courageous citizens of Kreševo gathered in the Kreševo Citizens' Movement managed to raise the case to the public level in a little over half a year in which they were leading a public campaign against unlawful work of the quarry and the lime factory, and degradation of human health. They also managed to “force” the competent inspection bodies to take concrete action. The citizens of Kreševo received a confirmation from the Federation Administration for Inspection Affairs in September that the company BFS d.o.o. Kreševo does not have a valid decision on water permit and that, after all facts were determined, a Decision was issued “prohibiting the use of facilities and plants used for processing mineral raw materials, limestone and dolomite”, but discharge of sludge into the Kreševčica River was noticed again thereafter. However, the Federation Water Inspector had in October 2021 forwarded a folder of cases to the competent Prosecutor's Office concerning possible environmental pollution and non-compliance with the administrative measures that the Federation Water Inspector imposed on BFS d.o.o. for the operation of the lime factory and the quarry in Kreševo. Kreševo Citizens' Movement launched a petition in October urging the competent institutions to take actions under their competence and to address observed irregularities by prohibiting the operations of the lime factory and the quarry until they meet all conditions for operation so as not to pollute the environment and endanger the health of local citizens. The purpose of the petition is for the citizens of Kreševo to present their unique request, which is that the time has come for the quarry and the lime factory to start working in line with the law.





## CIVIC ACTIVISTS FROM ZENICA FIGHT IRREGULARITIES!

Informal groups of Zenica citizens “Air Guardians” and “Movement for Change” held a joint street action in Zenica on the occasion of the International Anti-Corruption Day, announcing the beginning of their activities and activism in their city.

On that occasion, activists handed out an information leaflet to the citizens of Zenica as to draw their attention to the problem of misuse of funds from the Environmental Protection Fund of the Federation of BiH, which are paid annually to the account of Zenica-Doboj Canton, and which are intended for environmental protection projects and air quality preservation and improvement.

The informal group of citizens “Air Guardians” has come together around the idea that aims to increase transparency and purposeful spending of the funds disbursed from the FBiH Environmental Protection Fund by the Government of Zenica-Doboj Canton, focusing on the air protection projects. Although Zenica-Doboj Canton has been for many years now facing the problem of poor air quality that adversely affects the citizens’ health, the general impression is that not enough is being done to solve this problem whose negative impact is not negligible at all. The activists of the informal group of citizens “Air Guardians” sent an official initiative to the Government of ZDC in mid-December, requesting more significant funds to be planned by the Program for spending the funds of the FBiH Environmental Protection Fund for the projects and activities that would improve air quality in Zenica-Doboj Canton and the City of Zenica either through direct projects or through the air protection LOT. On the other hand, the citizens of Zenica, gathered around “Movement for Change”, are not satisfied with the fact that the drafts of three new Master Plans for the city area are to be adopted without prior adoption of the Zoning plan, which is outdated and needs to be harmonized with the new Spatial Plan of Zenica, whereafter more detail plans such as a Master plan can be made. The citizens feel that adoption of individual master plans exclusively favors numerous investors and the City administration is changing these master plans only for the purpose of building new commercial and residential buildings. The citizens want to stop this practice of the mayor and the City Council of Zenica by putting the Decisions on the adoption of three draft master plans of September 30, 2021 out of force due to irregularities observed in this procedure. Members of “Movement for Change” started the campaign with a clear message to the authorities of the City of Zenica that the public space of the city is a public good!!

# AUDIT FINDINGS ON THE REGULATION OF DRINA RIVER WATERCOURSE SUNK “VODE SRPSKE” AND CONFIRMED THE SUSPICIONS OF CIVIC ACTIVISTS



The claims of informal groups of citizens from the territory of Zvornik and Bijeljina, who are fighting to regulate watercourse management in the Drina River Basin, that the authorities had made serious omissions, with some elements of corruption as well, concerning riverbed and submersible land maintenance, dislocation and extraction of material from this river and from the land along its banks were confirmed. At the end of last year the Supreme Office for the RS Public Sector published the findings of a report in which most serious results of a report in which the public institution “Vode Srpske” was most seriously criticized, denying thus official claims made by this institution that “the public should know that illegal gravel exploitation in RS exists, but to a lesser extent”. The Performance Audit Report “Exploitation of river material as a segment of integrated regulation and protection of Drina River watercourse” covers the period from 2017 concluding that the sites where dislocation and extraction of materials from Drina River watercourse were not determined in line with the evaluated state of the watercourse, identified needs and priorities, nor were the necessary planning documents adopted. “The illusions that the exploitation of gravel and sand from watercourse and coastal land of the Drina River is carried out with issued water permits and other necessary documents have been shattered, because the auditor’s findings stated exactly the opposite. In fact, our statements and suspicions expressed during the Street Action in Bijeljina at the end of the year concerning the corruption and non-transparency of the procedures for awarding works contracts for extraction of materials from watercourse were confirmed”, said Dušan Aćimović, member of the group “Let’s protect the Drina riverbed and destruction of its banks in Zvornik”.



The audit also established that the achievement of set goals in terms of watercourse regulation and dislocation and extraction of materials was not monitored, nor were the effects of the existing method of exploitation of river material from the Drina River watercourse determined. Also, it was determined that the dislocation and extraction of materials from the Drina River watercourse are carried out under circumstances of incomplete and insufficiently harmonized regulations, and their incomplete implementation. Namely, the competent institutions have not established a planned approach to the dislocation and extraction of materials from watercourses as part of the integrated planning of the regulation and protection of Drina River watercourse.



## **Brčko – an oasis of unaccredited higher education institutions**

According to a research conducted by an informal group of students and others interested in regulating higher education in the Brčko District there are formally four Universities with 23 faculties, one College, organizational unit of the Istočno Sarajevo University and Mostar University to 83.000 inhabitants that this special administrative unit of BiH has according to the last Census. Two faculties of the Sarajevo University are also formally registered in the Register of the Brčko District Government. According to official data, a total of five higher education institutions are registered in the register of the Department of Education of the Government of the Brčko District of BiH. However, only eMPIRICA is registered in the National Register of Accredited Institutions in BiH kept by the Agency for Development of Higher Education and Quality Assurance in BiH, and the Agency confirmed this in its responses to the members of the informal group of citizens “A stop to unaccredited higher education institutions” who are engaged in fighting the corruption in this sector. Representatives of the informal group of citizens “A stop to unaccredited higher education institutions” further determined that the Department of Education of the Brčko District Government did not enter other higher education institutions, which are known to operate in the District, in its Register. One of them is the Faculty of Economics, which is a member of the University of Istočno Sarajevo. The University Department for Business Engineering and Management Banja Luka in the Brčko District of BiH, which is located in the building of the Serbian Orthodox Church of Brčko Municipality, also has not been registered. The Faculty of Economics, as well as six other faculties, are also part of this University Department in Brčko. The Brčko University “Economics Academy” of the Brčko District of BiH is also not registered in the National Register, nor is it registered with the Government Department of Education, although this private higher education institution was established by the Decision of the Brčko District Assembly of BiH in October last year. It consists of three faculties and a Research and Development Center.

All in all, the overall impression is that the situation in the Brčko higher education is chaotic and that those who have decided to fight for the order and attainment of the goal to have only accredited higher education institutions issuing the diplomas are facing a very demanding job. This particularly true as according to the Framework Law on Higher Education in BiH only an accredited higher education institution can issue academic degrees and diplomas.



# Real price of medicinal products

Once the analysis “Real price of medicinal products”, which is the first of its kind in the region, was completed its results were discussed both by the experts and the general public in BiH. The analysis showed that BiH citizens pay for the most expensive medicinal products compared to Serbia, Montenegro and Croatia, and the reason for that is that the legislation in BiH was passed under the influence of various lobbies and is exclusively subordinated to the interests of wholesalers and retail pharmacy chains in BiH. More than 200 media reports on this topic show that the public is very interested in this project, and the professional public has not remained silent, so there have already been reactions from the pharmaceutical chambers of RS and the FBiH, and the BiH Agency for Medicinal Products and Medical Devices. One of the results of the analysis was that supervision of the medicinal products market in BiH, worth over 700 million KM, is practically non-existent, and the Supervisory Body for the Implementation of the Rulebook on price control, pricing of medicinal products and reporting on prices of medicinal products in BiH has started to work following an intensive media campaign and pressure exerted by the Association Think Good. The association Think good held the first press conference on October 6, presenting the results of the analysis, and only a month later the Government of RS responded and reduced the retail margin on medicinal products from 20 to 18 percent, which angered the Pharmaceutical Chamber of RS, but also some retail pharmacy chains. Furthermore, the Association Think good held a press conference on November 19, 2021 in Sarajevo to present the initiative for amendments to the Rulebook on price control, pricing of medicinal products and reporting on prices of medicinal products in BiH that was forwarded to the BiH Agency for Medicinal Products and Medical Devices and the BiH Council of Ministers of BiH and already accepted. The initiative was accepted by the Supervisory Body after the representatives of the Association Think Good (Uroš Vukić and Sasa Stevanović) presented the analysis at the session and explained that the points made in the initiative are nothing that does not already exist in the region. Despite attempts to obstruct the entire process, the Supervisory Body, which did not sit before, adopted the initiative and forwarded it to the Director of the Agency for Medicinal Products and Medical Devices and the BiH Council of Ministers of BiH for further procedure. Adoption of this initiative, and ultimately amendments to the Rulebook on price control, pricing of medicinal products and reporting on prices of medicinal products in BiH, citizens in BiH and health insurance funds across BiH would save between 35 and 50 million KM without jeopardizing a single job in Bosnia and Herzegovina. In the continuation of the project, the Association of Think good will submit an initiative to the entity governments in BiH to amend the regulations governing the medicinal products market following the model in Serbia and Croatia, where the retail margin on medicinal products is differentiated, meaning that an increase in price of a medicinal product implies a decrease in retail margin, which will certainly reflect in lower prices of medicinal products, saving the citizens a lot of money.



# Without any connections and fair

The project “Without any connections and Fair” is just a step to encourage young people to fight corruption and to learn how to do it. Greater knowledge about the harmfulness of corruption and reduction of tolerance for corrupt behavior strengthens the rule of law and citizens’ trust in institutions. We want to reinforce and promote the tools for successful advocacy of concrete anti-corruption measures by concluding memorandums of understanding. Therefore, the first memorandum was concluded in Zenica on December 14, 2021 with the partner organization Reaktiv from Zenica. Apart from Reaktiv, the memorandums were also concluded with the Center in the Orahovica community, the Association Albatros Zenica, Studio Theater, Association “Kreativci” Zenica , and the Association of Children and Young People with Diabetes. The representative of the Youth Organization “Centar”, which is a partner organization on the project, signed the memorandum on December 23 in Sarajevo, followed by signing of the MoU in Mrkonjić Grad by the following organizations: the Association of Citizens “C.E.Z.A.R”, Youth Club “Diamond”, Institute for Youth and Community Development “Perpetum mobile”, Association “Cheers” and Association “Bridge”. The signing of memorandum continued in Sarajevo on December 24 and 28, 2021 with partner organizations Munja Social Innovation Incubator and Youth Initiative for Human Rights – YIHR and their partner organizations AIESEC in Bosnia and Herzegovina, Bosnian Representative Association for Valuable Opportunities (BRAVO), Organization “Rights for All”, Initiative and Civil Action (ICVA), PRONI Center for Youth Development, Mediacentar Sarajevo, Youth News Organization in Bosnia and Herzegovina, Association for Youth Development and Support Plus Ultra. The signing of the MoU continued in Tuzla on December 29, 2021 with the partner organization Youth Resource Center Tuzla - ORC Tuzla and their partner organizations Tuzla Community Foundation, Tuzla Citizens’ Forum, Tuzla Citizens’ Association “MULTI”, Tuzla Youth Movement Revolt, Youth Council of Tuzla Canton, Activist Movement Cardboard Revolution, Tuzla. The interviews with the institutions were recorded after responses to the sent letters were received. Our interlocutors were Hasim Šabotić, Director of the Agency for Prevention of Corruption and the Coordination of the Fight against Corruption, Erduan Kafedžić, Head of the Sarajevo Canton Anti-corruption Office, Boris Grubešić, spokesman of the Prosecutor’s Office and Emsad Dizdarević, program manager of Transparency International BiH. They spoke about the role of institutions and anti-corruption mechanisms. Young people, who were part of the teams, agreed to participate in creating stories about the teams, and the stories were filmed in December. They spoke about the role and contribution of young people in supporting the fight against corruption, as well as the role of institutions in this process, presenting their experience in the project and the cases they had worked on.



# By education and informing the citizens we raise awareness about necessity of anti-corruption efforts in Canton 10

The Center for Civic Cooperation from Livno had conducted activities to collect information on irregularities in public sector recruitment process under the project “Support to engaging the citizens of Canton 10 in the fight against Corruption in Public Sector Recruitment Process”. The current situation was analyzed based on the answers collected through the questionnaire and the legislation in force in Canton 10, which were also used to identify shortcomings and make recommendations to improve the legislation in Canton 10.

The activity of collecting information on recruitment process in the public sector was conducted in October, November and December. The CGS team prepared and sent Questionnaires to the addresses of 27 institutions and public companies. These questionnaires were sent to the institutions and companies in line with the FBiH Freedom of Information Act. It should be noted that a number of institutions/companies did not respond within the legally prescribed deadline, but with the intervention made by the project team, majority of the institutions that failed to respond within the first deadline submitted completed questionnaires subsequently. On the other hand, 3 institutions/companies did not respond at all. The intention of this activity was to gain a better insight into the course and process of recruitment, the implementation of recruitment procedures, appeal procedures and the presence of fraud in the public sector recruitment process.

As part of the long-standing CGS project “Together for Workers’ Rights” another anonymous online survey was conducted in parallel with this activity. A total of 181 people from BiH answered the online survey, whereof 88.4% had experienced irregularities in the public sector recruitment process. The most common answer, 114 respondents or 63%, which the respondents listed as the reason for not being recruited is that they knew in advance who will get the job. It is interesting to compare the answers given by institutions and public companies and the answers given by people who applied to the vacancies. Respondents from BiH expressed their dissatisfaction with the recruitment procedure and indicated the presence of corruption, rigging and favoritism in the procedure, while on the other hand public institutions and companies denied irregularities and explained how all recruitment procedures and process are conducted in line with the Law and regulations. The expert team used the conducted analysis to make recommendations for amendments to the Laws covering recruitment in public sector in Canton 10, which will be presented through promotional materials and at a press conference to be held in mid-January in Livno.



## Fight against corruption in maternity hospitals

The focus of the project “Fight against corruption in maternity hospitals” during the last quarter of 2021 was on establishing the cooperation with maternity hospitals and other relevant institutions, as to directly reduce corruption rate in the maternity hospitals through joint action of all relevant actors. A big step forward has been made in this field, as the Association managed to bring together the representatives of Agency for Quality Improvement and Accreditation in Healthcare in FBiH, the Sarajevo Canton Anti-Corruption Office and the General Hospital “Prim.dr. Abdulah Nakaš”. The cooperation was made official in early December through a press conference attended by representatives of the aforementioned institutions, as well as representatives of the Association BABY STEPS. In their statements participants pointed out that the improving the conditions, i.e. raising the standards in the provision of health care in all maternity hospitals represent the foundation for reducing corruption in maternity hospitals. Furthermore, an important element of this fight is education of both the citizens and the staff of maternity hospitals that giving and receiving gifts and “envelopes” in a medical institution substitutes a crime, i.e. that “treating a person to anything” is just a euphemism for corruption, which is punishable by law. The participants expressed their readiness and will to work together on these issues, all with the aim of reducing corruption in a place where there should not be any - a place where mothers give birth to their children. Five major media outlets were present at the press conference.

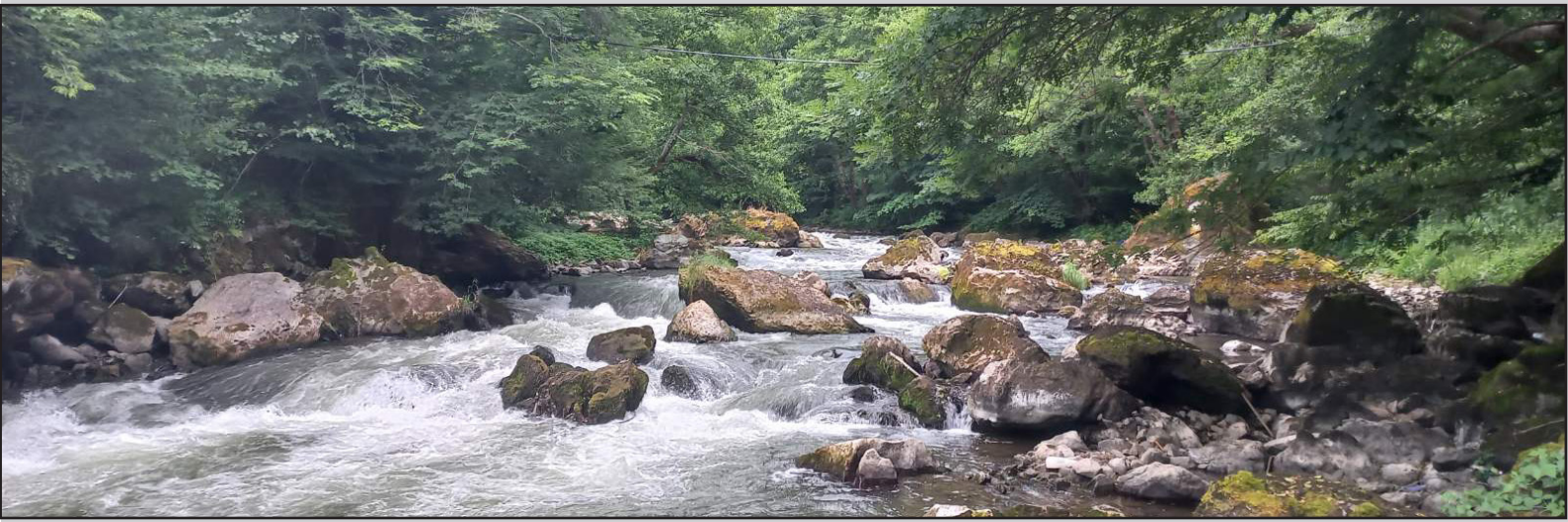


A Memorandum of Cooperation was signed between the Association BABY STEPS and the Agency for Quality Improvement and Accreditation in Healthcare in FBiH during December. The signing of a Memorandum of Cooperation between the Association BABY STEPS and the Sarajevo Canton Anti-Corruption Office was also announced. The cooperation agreed with the two maternity hospitals—the maternity ward of the General Hospital “Prim. dr. Abdulah Nakaš” in Sarajevo, and the maternity hospital of the University Clinical Center of RS in Banja Luka, which are among the largest in the country, has to be singled out as the largest progress made on the project. Cooperation with these maternity hospitals will be realized in the area of improving the corruption reporting mechanisms. Although the focus during the given period was on cooperation with institutions, this project is, at its core, linked to real people and real stories. That is why activities that will give mothers and their families a voice and an opportunity to get information are continuously being carried out. The activities to collect anonymous personal experiences of mothers and to raise awareness through signing of the petition were continued. The Association set up an information desk in the SCC Center (Sarajevo) at the end of October, where all those interested could get information about the problem of corruption in maternity hospitals/wards and sign the petition, which was also available online. A total of 2.000 persons have signed the petition so far.



## Municipal Council of Travnik said “NO” to planning of new small HPPs!

In line with the citizens' demands and requests expressed at the public discussions the Municipal Council Travnik gave a negative opinion on planning of new small hydropower plants in the Spatial plan of the Central Bosnia Canton 2005-2025. According to the adopted opinion the Municipal Council will not consent to construction of small hydropower plans if there is no consent of the local community on whose territory the construction is planned. The informal group of citizens "Let's raise our voice for our rivers" has in cooperation with the Association "Resource Aarhus Center in BiH" conducted many activities since June aimed at protecting the rivers in the Central Bosnia Canton. One of these activities was a civic initiative seeking legal protection of the rivers in Central Bosnia Canton, which collected 2.605 citizens' signatures. A day before the Municipal Council's session the activists organized a press conference in front of the Municipal Council's building with the message "BE WISE SAVE UGAR", urging all councilors to protect the rivers of Travnik. Activists are partially satisfied with this decision of the Municipal Council of Council, but they are not satisfied with the fact that Municipal Council did not request all small HPPs whose construction has not started yet to be removed from the Spatial plan, and the investors only have concession contracts that were signed earlier and they hope an opportunity will arise in the future to revise these contracts.



# Municipal Council of Jajce adopted the Declaration “Municipalities without dams”

The Declaration “Municipalities without dams” was adopted by the Municipal Council of Jajce during October, and it shows clear political will of the local authorities to protect current and future generations and their rights to water and sound environment. Furthermore, at the proposal of the Association “Resource Aarhus Center in BiH” and activists from Jajce, the Municipal Council adopted a Conclusion that it will not allow planning of new small hydropower plants in this municipality, nor the issuance of concessions for these facilities. The adoption of the declaration was preceded by the plans for construction of two small HPPs on the Pliva River, one of which was to be built only 300 m from the Pliva waterfall, prompting engagement of the citizens who collected more than 6.000 signatures against the construction of small HPP “Pijavica” and small HPP “Elektrobosna”. The declaration “Municipalities without dams” was drafted by members of the Coalition for protection of rivers in BiH, and the Executive Director of the Association “Resource Aarhus Center in BiH” presented it to the councilors at the session of the Municipal Council of Jajce. The members of the Association Aarhus have been providing legal and professional assistance to the citizens of Jajce in their fight against the construction of two small hydropower plants on the Pliva River from the very beginning, and in that context they had, together with other representatives of the Coalition for protection of rivers, held a meeting with the mayor of this municipality in June 2021 at which they presented the Declaration for the first time, explaining why it has to be adopted.



## The House of Peoples adopted draft Law amending the Law on Electricity in FBiH!

The House of Peoples of the FBiH Parliament adopted proposal for the Law amending the FBiH Law on Electricity on the International Anti-Corruption Day, December 9, 2021, and all delegates present had voted “IN FAVOR” of the law. Such a positive result can be attributed to strong activism of members of the Coalition for the protection of rivers in BiH who exerted strong media pressure, strongly supported by the BiH citizens, and who sent individual letters of support for adoption of the Law at the initiative of the Association “Resource Aarhus Center in BiH” and the Foundation Atelier for Social Changes “ACT”. The conclusion of the House of Representatives of the FBiH Parliament on accepting the draft Law on Electricity in FBiH was adopted after the HoR returned the draft to a regular procedure on April 27, 2021 and discussed it. According to the Conclusion the FBiH Government, which was the proponent of the draft Law, was tasked to prepare a proposal for the Law by June 15, 2021 and to forward it to parliamentary procedure. However, as the House of Peoples did not consider the aforementioned draft, the Government was not able to continue the usual procedure and to prepare a proposal for the Law. The Association “Resource Aarhus Center in BiH” had therefore launched a campaign during September and October to accelerate the adoption of the Law by the House of Peoples.

# Virus za koji ima lijek!

Podrška građanima u borbi  
protiv korupcije u zdravstvu



## A virus for which there is a cure

The citizens' association Stop Mobbing and the partner association Kap are implementing a project for the prevention of corruption in health care "A virus for which there is a cure!", which achieved significant results in the past period. A survey was conducted among the citizens and the patients in BiH on a sample of 2.000 respondents, and "Analysis of perceptions, experiences and attitudes of citizens about corruption in the health care in BiH" was published. The value of this analysis lies in the fact that it is the first of its kind realized during the Covid-19 pandemic and it revealed that every third citizen in BiH knowingly gives money or a gift, i.e. a bribe for a health service as to get a better treatment or to get treated at all when using the services of public healthcare. The survey revealed that patients in RS give bribes mostly in the form of gifts (56%) and money (44%), which is most frequently done for a surgical treatment and diagnostic tests. Similar results are in the Federation of BiH. In the part related to the provision of health services and corruption during the pandemic, 89% of respondents in RS stated that they were denied health services, while 36% of respondents in FBiH had the same experience. The most commonly denied services to patients during a pandemic are specialist medical examinations. In order to receive health care "83% of respondents in RS and 78% in FBiH get treated in privately owned clinics", which raises the question of how justified it is to pay public health services.



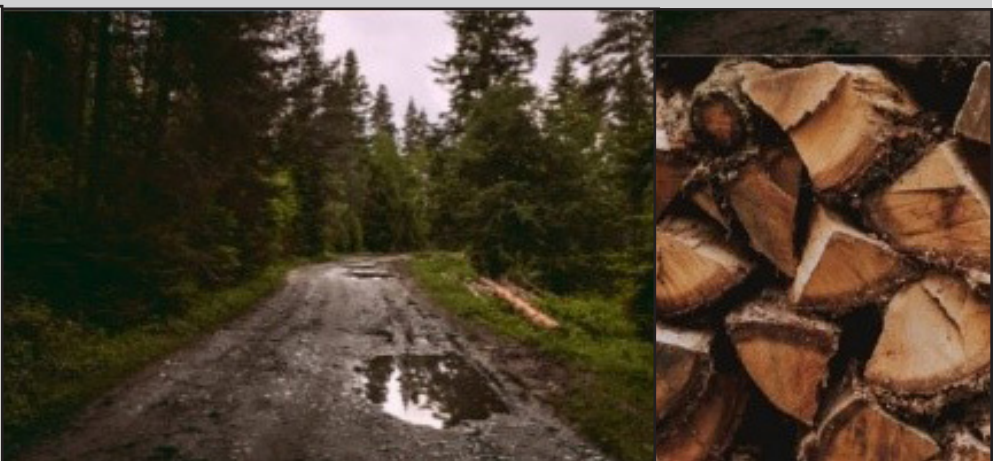
Street actions were organized to collect citizens' signatures of support in RS for the adoption of the Law on Rights, Duties and Responsibilities of the Patients in RS. The street actions were organized in Trebinje, Doboj, Banja Luka, Novi Grad, Prijedor, Gradiška, Ljubinje, Nevesinje, and 3.075 signatures were collected. The petition was handed over to Ljubiša Krunic, an MP in the NA RS, who will launch an initiative for adoption of the Law on the Rights, Duties and Responsibilities of the Patients in RS. Adoption of the aforementioned Law in RS would narrow the space for corruption in health care, because prevention and sanctioning of various irregularities in the public health sector will be guaranteed by the law once this area is regulated. Street actions were organized to collect signatures for the Initiative by which citizens and patients in FBiH demand more consistent implementation of the Law on Rights, Duties and Responsibilities of the Patients in FBiH. The signatures were collected in Bihać, Cazin, Bužim, Sarajevo, Zenica, Tuzla, Mostar, Gračanica, Kalesija, and Tomislavgrad. A total of 2.000 signatures were collected and handed over to the Federation Ministry of Health on December 23, 2021 and it was closely followed by the media. A billboard was put up in Banja Luka near the building of the RS Government as a reminder of the importance of adopting the Law on Rights, Duties and Responsibilities of the Patients in Republika Srpska. The billboard is used to remind the RS Government that Republika Srpska does not have the Law on the Rights, Duties and Responsibilities of the Patients, which makes room for corruption and other illegal activities in the health care. Furthermore, the citizens and the patients were able to make short two-minute videos and to present their experience with the corruption and nonobservance of the patients' rights. The intention of this part of the project is to spark the citizens' interest, to encourage and to motivate them to report cases of corruption in health care, and to mobilize the media to report more agilely on this issue, thus increasing the level of transparency and accountability of the BiH healthcare system. The videos are broadcast on social networks, and the media (Free Europe, Una TV) also use them as an illustration for reports about corruption. The two associations produced 5 out of 10 planned short video stories.

# **Systematically and uncompromisingly against systemic corruption in the public sector that undermines the right to work and dignity of persons with disabilities in the Federation of BiH**

The Association Trade Union of the Fund's employees held a series of meetings with persons with disabilities in the last quarter of 2021, with the aim to encourage persons with disabilities and their activities. Another result of their activities is the success they had at terminating the privileged status of more than 50 companies in the FBiH as companies that employ persons with disabilities, since they actually do not have this status as they no longer employ persons with disabilities.

The termination of the status of a company for the employment of persons with disabilities for more than 50 of them is a concrete result of our activities. Now, these companies will neither be able to abuse their status nor the funds from the budgets at different levels of authority, which is a positive outcome of our activities.

**STOP**   
**ILEGALNIM**  
**AKTIVNOSTIMA**  
**U SEKTORU**  
**ŠUMARSTVA**



## **Application for anonymous reporting of illegal activities in forestry with the help of citizens**

The Forestry and Environmental Action Initiative (FEA), which runs the campaign Application for anonymous reporting of illegal activities in forestry with the help of citizens, underlined that the application was downloaded 183 times from the Google Play, and 104 times from the Apple Store in the last quarter of 2021. The total number of reports of illegal activities in forestry for the Sarajevo Canton territory in the reporting period was 16, while a total of 6 reports were registered for Zenica-Doboj Canton. The FEA organization has on December 27, 2021 started a four-month media promotion of the application through the online portals in Sarajevo Canton and Zenica-Doboj Canton. During the reporting period, the FEA continuously promoted the availability of the "Let's Protect Forests" application through social networks, online portals, TV guest appearances and meetings with the stakeholders.

## Ilegalne aktivnosti u šumarstvu

Prema Zakonu o šumama Kantona Sarajevo, u šumama i na šumskom zemljištu zabranjene su aktivnosti:



stavljanje u promet drveta bez otpremnog iskaza



odlaganje otpada, smeća ili zagađujućih tvari



nedrvne šumske proizvode (ljekovito, jestivo, aromatsko bilje, gljive, šumski plodovi, i sl.) stavljanje u promet bez odobrenja korisnika državnih šuma i šumskog zemljišta ili vlasnika šume



Bez odobrenja korisnika ili vlasnika šume zabranjeno je:



postavljati logore/kampove u šumi



smještati pčelinjake



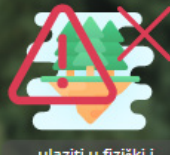
sakupljati nedrvne šumske proizvode u količini koja prelazi 1 kg



ulaziti u područja, šumske ceste ili izletišta gdje se vrši sječa



ulaziti u područja namijenjena za lov



ulaziti u fizički i znakovima označena šumska područja i zatvorene šumske ceste



On the occasion of the International Anti-Corruption Day, the FEA team conducted a two-day online campaign to raise awareness about the fight against corruption in the forestry sector. Lejla Hukić, project coordinator, gave the following statement: “The presence of corruption affects poor and underdeveloped communities the most, diverting investments away from people and areas where they are most needed, negatively affecting the stability, security and development of BiH society and the country. This is, among other things, especially felt in the forestry sector, one of the most important economic branches, where the consequences do not affect only the society, but also the natural capital and resources that are degraded and destroyed daily. FEA strengthens its positive impact on all segments of society through the implementation of the mentioned project, with a special emphasis on strengthening cooperation with competent authorities willing to invest in improving their efficiency by building strong anti-corruption mechanisms and instruments, as well as continuously raising public awareness on this issue.”



*“The problem of corruption and illegal activities is that it has multiple dimensions and starts with an individual, going through groups to the entire system, sector, etc. Therefore, the key postulate is to change the attitudes among individuals and continuously raise awareness of the entire society about the far-reaching consequences of even the smallest illegal activities, because everything starts from a single tree.”*

Ajla Dorfer, Regional Program Director

# Youth against corruption: Don't be the weakest link

The Center for the Development of Youth Activism (CROA) has on October 29, 2021 organized an anti-corruption café “It can be different” with the writer Nenad Veličković as part of the campaign “Youth Against Corruption: Don't Be the Weakest Link”. Students who were at the anti-Corruption Café had a unique opportunity to openly talk with the professor at the University of Sarajevo, Nenad Veličković, about corruption, being successful without engaging in corrupt practices, personal integrity, independence, working and achieving the goals by solely relying on one's own resources. The students also had the opportunity to ask questions about phenomena they observe and that disturb or make them feel insecure about their education or the future. The answer given to many time heard question “why students do not stand against bad legal solutions or practices that endanger them” was that they do not know their rights and duties, that they fear failure, that they do not have support of their colleagues or even the ones they think should be reacting.

On November 13, 2021 the students talked to the award-winning young artist Marko Kusmuk as part of the anti-corruption café “It can be different” held at the Faculty of Economics in Pale. The goal of this anti-corruption café - to talk about being successful without engaging in corrupt practices, personal integrity, independence, working and achieving the goals by solely relying on one's own resources - was completely achieved. Students asked questions about the motivation behind being successful field, and sought recipes on how to tackle the fear of failure. Additionally, on November 19, 2021 the students had the opportunity to talk to the Dean and 19.11.2021. The students also had a conversation with the dean and vice-deans of the Faculty of Economics in Istočno Sarajevo. The students had the opportunity to talk with Dean Radomir Božić, Vice Dean Marko Đoga and Professor Damjan Danilović about their thoughts and suggestions on how to improve the fight against corruption in this and similar institutions. Stop to buying of exams, equal conditions for all, success without any favoritism are just some of the attitudes that students presented to the teaching staff and had raised many important issues for responsible and transparent education. The majority of students assessed that it is possible to succeed in Bosnia and Herzegovina and that success is possible without corruption, and that it is up to each individual to choose which path to take. “Corruption is present everywhere, but we need to start from ourselves and I believe that young people who are eager for knowledge and success will not resort to corruption, because there are always consequences and some is held accountable at the end, and the truth comes out,” said student Danilo Klačar. During the conversation students and teaching staff paid special attention to the anti-corruption mechanisms that this Faculty is developing - a box for anonymous reports of corruption, open doors to the classrooms of all responsible persons ready to talk about irregularities. An open conversation between students and the management of the Faculty of Philosophy, University of Istočno Sarajevo, held on November 26, 2021, touched upon many topics in the field of anti-corruption and prevention of corruption in education, as well as ways to improve existing anti-corruption mechanisms. As doc. dr. Vuk Vučetić said “there is an open relationship between teachers and students. All possible problems are solved in communication with students, so practically no corrupt practices can happen.”



CROA organized an action of students of the Sarajevo Faculty of Pharmacy in the Campus of the University of Sarajevo on October 26, 2021, which was approved by the Chancellor of the University of Sarajevo. The event was attended by 40 students who exchanged views on the problem of corruption, learned about the possibilities of receiving legal counseling within the project. Students were also invited to future events organized by the project, and received promotional materials aimed at raising awareness of the importance of a joint fight against corruption in education.

The activists of the Student Organization of Istočno Sarajevo and the Association CROA talked with students on November 10, 2021 at an event organized in the entrance hall of the Faculty of Economics, University of East Sarajevo (Pale), discussing the problem of corruption in education and the importance of building a culture of zero tolerance to corruption. The goal of the action was to raise awareness and mobilize students to stand up against corruption and motivate young people to say NO to corrupt practices at their faculties, but also in life. The legal aid service provided by the CROA Association under the project was also promoted at the event. Students were informed that they can seek legal assistance via e-mail [pravnapomoccroa@gmail.com](mailto:pravnapomoccroa@gmail.com), with a focus on anti-corruption issues at universities and their organizational units. Students of the University of Sarajevo have decided to mark the International Anti-Corruption Day online on December 10, 2021 in cooperation with CROA. Symbolically, one anti-corruption message was published every hour, between 10 a.m. and 8 p.m.



# Anti-corruption campaign and raising public awareness about the work of the Prosecutor's Office in RS

Citizens' Association Put pravde (the Path of Justice) is working to raise citizens' awareness of the inadequate work of the judiciary, pointing out the possibilities for the citizens' engagement, which would result in greater involvement of civil society in this problem and ultimately to more adequate work of the prosecutor's office and thus the judiciary itself. Research on "Knowledge of the work of the Prosecutor's Office, the level of institutional trust and perception of corruption" was completed in October 2021, which showed that citizens think there is a high degree of corruption in the Prosecutor's Office, but are not sufficiently familiarized with the reporting mechanisms. The completion of the research was followed by the Third International Conference "Justice for David" entitled "Anti-Corruption Campaign and Raising Public Awareness of the Work of the Prosecutor's Office in Republika Srpska" that was held on October 30, 2021. The results of the research were presented at the Conference.



Participants of the conference were representatives of the Citizens' Association Put pravde, Davor Dragičević, Justice for David activist, Eric Larson, international prosecutor and anti-corruption expert, Ifet Feraget, lawyer, and representatives of other NGOs and media, as well as numerous Justice for David activists. In his opening remarks Davor Dragičević gave a chronologically overview of his activities conducted in terms of the Prosecutor's Office during 2018, as well as the issues he faced in communicating with the Prosecutor's Office.



During the conference Erick Larson delivered a lecture on "Integrated investigations in cases of corruption, including the role of the Republika Srpska Prosecutor's Office." It was pointed out that integrated investigations imply a holistic approach of the entire government and civil society, involvement of the police, prosecutor's offices and administrative bodies, the public and civil society, as well as open-source resources with a primary focus on the use of administrative procedures. Corruption in BiH, including the RS and the judiciary, is widespread and endemic. It is important to adopt a package of "integrity reforms" and to exert pressure on the prosecutor's office and courts to resolve cases efficiently and quickly at all levels.

It is necessary for civil society to “stop having a relationship with corrupt officials”. Every citizen should report corruption. These are some of the conclusions of the Conference. Project activities of the anti-corruption campaign and raising public awareness about the work of the Prosecutor’s Office in Republika Srpska and the research “Knowledge of the work of the Prosecutor’s Office, the level of institutional trust and perceptions of corruption” were presented during the plenary session.



December 25, 2021 marks three years since police repression was carried out on people gathered around the Justice for David group. On the occasion of this anniversary Sofija Grmuša, President of the Citizens’ Association “Put Pravde”, addressed the gathering and pointed out the most important conclusions and recommendations derived from the research:

- There is an urgent need to educate the general public about how the prosecutor’s office works, what its competencies are, and what kind of hierarchical organization have the prosecutor’s offices from the local to the national level.
- It is necessary to conduct special education of the general public about the office of the disciplinary prosecutor, what his responsibilities are and how the office of the disciplinary prosecutor works, how to prepare and to submit reports for inadequate work of the prosecutor’s office.
- It is necessary to bring the topics of the work of prosecutor’s offices as close to the public as possible through the media, portals and social media channels, using educational material. Citizens must know how to prepare and to submit a report themselves without a lawyer and high financial costs.
- It is necessary to empower citizens to be actively involved and to report the inadequate work of prosecutors through education, the media and presentation of basic information on the given topic.
- It is necessary to launch an initiative to change the law in the part concerning the duration of criminal proceedings, and the rational limitation of the work of the prosecutor’s office and decision-making.
- Access to information in the possession of the prosecutor’s offices should be sought through their public relations services. It is necessary to launch an initiative to organize round tables and panels with representatives of prosecutor’s offices
- It is necessary to go public with the data related to the work of the RS Prosecutor’s Office, the number of cases taken over and resolved, or typically the number of unresolved cases and the number of conducted investigations.
- Statistical analysis of the number of cases taken over, number of investigations conducted and other data for every prosecutor’s office and all prosecutors should be made publicly available to the general public.



**Husein UPFBiH**



**Nikola Mlakic**

**Marinko Miličević**

## Corruption free business operations!

After a meeting with the Focus Group for Drafting the Law amending the Law on Games of Chance, where members unanimously supported the proposed initiative without amendments, the FBIH Association of Employers forwarded the material to all permanent members of the Specialized Body for consideration and to the Federation Ministry of Finance, which is responsible for the Law and its implementation. The main goal of adopting the Law amending the Law on Games of Chance is to reduce corruption of civil servants and officials. The aim of the amendments is to achieve compliance with applicable regulations and to ensure equal treatment to everyone. All members of the Specialized Body unanimously supported the initiative to amend the Law. The FBiH Ministry of Finance has already earlier expressed its support to the proposed amendments to the Law on Games of Chance. It was concluded that all members of the Specialized Body will submit their proposals and comments in writing aimed at getting the highest quality legal solution. Representatives of the FBiH Ministry of Finance had informed us in a meeting that the preparation of the Law amending the Law on Games of Chance is planned, and that the Association will be actively involved in its drafting, which is planned for the next year. A meeting of the Specialized Body for drafting the texts of the Law amending the FBiH Law on Road Transport was held on October 29, 2021. The task of the Specialized Body is to analyze proposal of the Law made by the legal team of the BiH Association of Employers in cooperation with an external expert, and to give its views and proposals aimed at drafting the final text of the law. The issue of the obligation to perform preventive technical inspection is regulated in different ways by regulations at the national and Federation level. Regulations at the Federation level are not harmonized with regulations at the level of BiH, and FBiH bodies are obliged to make the necessary alignment. FBiH regulations were not changed and aligned with these changes after more than four years, and the consequence thereof is that two provisions regulate the same thing differently. Therefore, business operators are exposed to fines, because inspectors can choose which regulation to apply and whether to penalize the subject of supervision for failing to perform a preventive technical inspection. The conclusion of the meeting is that amendments to the FBiH Law on Road Transport will be initiated, as well as amendments to the FBiH Rulebook on Preventive Technical Inspections of Motor Vehicles and Trailers, in order to harmonize the with the Law on Basics of Road Safety in BiH. The adoption of the proposed amendment will not leave any room for inspection bodies to conduct inspections under different, mutually non-compliant laws and they will not have the possibility to apply one or the other, or to choose whether to sanction the subject of supervision or not.

Director of the FBiH Association of Employers and project manager Mladen Pandurević, as well as representatives of the Group of Road Transport Employers of FBiH Nedžad Siočić and Safudin Čengić, held a meeting with the Minister of Transport and Communications of FBiH Denis Lasić and his associates on November 16, 2021. The interlocutors also discussed the initiative of the Association of Employers of BiH to amend 2 articles in the FBiH Law on Road Transport. The first proposal is to delete the obligation that a person engaged in transport operations by motor vehicle must have at least III degree of professional qualification as driver of motor vehicles, because this obligation results in lack of people who can perform these operations. Furthermore, the request is made to align national and entity laws and bylaws in the part that prescribes the obligation to perform preventive technical inspection of trucks. After the FBiH Association of Employers had on October 20, 2021 submitted the two initiatives with the proposals of laws that were so far finalized through the project to the FBiH Government it contacted the Office of the Secretary of the FBiH Government to obtain information on their status. The first initiative concerns a set of laws (the FBiH Law on Inspection Procedure, Law amending the Law on Administrative Procedure, the FBiH Law amending the Law on Misdemeanors and the FBiH Law on amending the Law on Inspections) regulating the work of inspection bodies i.e. they reduce the risk of occurrence of corrupt activities. The second initiative contains a set of laws (the Law amending the BiH Law on Food, the Law amending the FBiH Price Control Law and the Law amending the FBiH Law on Internal Trade) whose amending will harmonize different penalties for the same offense. The information received from the Secretary of the FBiH Government was that action were taken in response to the initiatives, and that the proposals of the laws were forwarded to the BiH Ministry of Foreign Trade and Economic Relations, the BiH Food Safety Agency, the FBiH Ministry of Justice and the FBiH Ministry of Trade that are responsible for the aforementioned laws. Finally, the Association of Employers of Sarajevo Canton has, in cooperation with legal experts and the project team of FBiH Association of Employers, prepared amendments to the draft Law on Utility Taxes of Sarajevo Canton. Amendments to Articles 19 and 20 of the Law on Utility Taxes stipulate the fines must be set in a certain range, namely the ratio between the initial and the maximum fine must be 1:5 in order to significantly reduce the risk of corrupt activities of the competent inspection bodies. This does not leave the possibility for the competent inspection bodies to request bribes from the subject of inspection supervision in order to determine more lenient penal provisions by applying discretionary assessment. The Association of Employers of Sarajevo Canton will submit Amendments to the draft Law on Utility Taxes of Sarajevo through the Economic and Social Council for the Sarajevo Canton, where it will be subject of consideration.

**POSLODAVCI  
PRIJAVITE  
KORUPCIJU!**

  
Poslovanje **bez** korupcije!



# Let's scan corruption!

As part of the Let's scan Corruption project, the citizens' association Demos organized a street action on November 6 to promote the project and the problem of the procurement of CT and MRI devices for Brčko healthcare. Damjan Dundžić, project coordinator, pointed out that it is very important for the public to receive the information contained in the reports, because the public deserves to know why we have been suffering for so many years, all because of unsuccessful attempts to procure these devices. "We can speculate about the reasons why the past public procurements of CT device ended ingloriously, but the word of expert has much more weight to it, which is one of the main reasons why they are engaged on the project. We believe that this is the only right way to fight, or rather to prevent corruption, because the public is the best filter for all potentially dishonest actions, and on this occasion we sincerely ask all media outlets to be with us in our future battles for a society with less corruption because we are aware that this is a plague of modern societies that is very difficult to eradicate."

Božidar Jović, president of citizens' association Demos "Let's scan corruption" pointed out that Demos is satisfied with the purchase of the CT device. "As we know, a CT device was procured for the "Brčko Health Center" in the past period and we from the organization are happy because we believe that our pressure has made a great difference when it comes to the procurement of the device which, admittedly, is not fully operational yet, but we hope it will be very soon, once all professionals operating this device are fully trained", said Jović. The head of the Department of Health and other services also gave a statement after all the media reports on the action: [https://nula49.com/brcko/sead-sadic-borba-protiv-korupcije-vodi-se-istinom-a-ne-dezinformacijama/?fbclid=IwAR20fktD5jotHjHYOgdqL2q7VKDkBy1yYyr3BYlaoBnVB5M0eHj9\\_4NAzmk](https://nula49.com/brcko/sead-sadic-borba-protiv-korupcije-vodi-se-istinom-a-ne-dezinformacijama/?fbclid=IwAR20fktD5jotHjHYOgdqL2q7VKDkBy1yYyr3BYlaoBnVB5M0eHj9_4NAzmk), whereafter Demos also issued a press release: <https://nula49.com/brcko/ug-demos-odgovorio-sadicu-ct-nije-100-u-funkciji/?fbclid=IwAR3BX8fdtdaMVjNfNRLsqv5Wly43SsBsJOant6L3Y84SxYYZxfgTH2gYs5o>.

A street action was held on the Anti-corruption Day to distribute materials that indicate corruption and the fight against corruption. "The figures speak of the devastating nature of negative demographic statistics; according to the "UN Population Analysis and Projection for 2020-2070" conducted by the UN, less than 1.6 million people will be living in BiH, which is less than the population of Belgrade! If we know that corruption is the biggest reason for the degradation of society, we have a moral and legal obligation to react as socially responsible members of that society. Their focus in the forthcoming period will be on the recruitment in the entire public sector in Brčko District of BiH, and especially in the Department of Education, where they have noticed most unlawful activities with elements of corruption. It should not be happening that we have qualified persons at the employment bureaus, and that certain teachers in schools have excess of classes and salaries exceeding 2.200 KM. Those who work must have contracts that guarantee them all labor rights, and not the contracts that do not guarantee them the right to health care. This goes for all employees in public institutions and public enterprises. "Ambrosia must be uprooted and everyone in BiH must start from their own backyard. Brčko District of BiH is my yard, help us do this!"

### “FOLLOWING THE REPORT OF CIVIC ACTIVISTS, THE POLICE DISCOVERED LARGEST GRAVEL CRIMINAL WHO TOOK 2.3 MILLION KM WORTH OF GRAVEL”

The Doboj Police Administration has, in its today's press release, signed by spokesperson Dragana Kerkez, stated that it submitted a report on committed crime to the District Public Prosecutor's Office Doboj on September 30, 2021 against a person, initials P.D. from Derventa due to reasonable suspicion that the person had in the period from May 1, 2017 to July 18, 2017 committed the crime “Abuse of authority in economy” and in the period from July 18, 2017 to March 31, 2021 the crime “Unlawful conduct in business operations” and “Unlawful capturing and exploitation of natural resources and goods of public importance.”



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### “CITIZENS SAID NO! TO HEAVY METAL MINES IN OZREN”

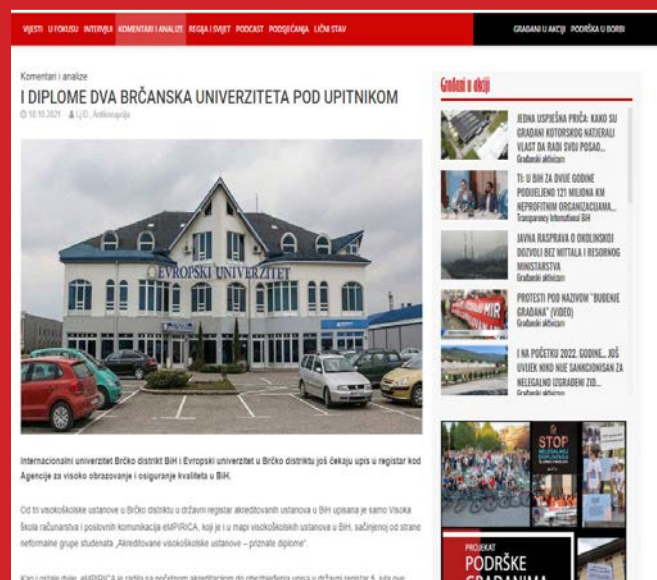
Although the government supports the activities of “Lykos Balkans metal”, the local citizens protested against the announcements that drilling on four planned wells will begin this week, for which platforms and access roads have been prepared. Especially Sočkovac, which is marked in historical documents as an area with large nickel deposits.

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### “DIPLOMAS OF TWO BRČKO UNIVERSITIES UNDER QUESTION MARK”

The eMPIRICA College of Computer Science and Business Communications is the only higher school institution amongst the three in Brčko District of BiH that is registered in the national register of accredited institutions in BiH, and it can also be found in the map of higher education institutions in BiH, compiled by the informal group of students “Accredited Higher Education Institutions - Recognized Diplomas”.

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## ANNUAL REPORT ON PUBLIC PROCUREMENT MONITORING PRESENTED: RISKY SPENDING 133 MILLION KM

The Portal for monitoring of risky public procurements “We monitor tenders” (Pratimo tendere) and the Association CRMA presented the annual results of anti-corruption monitoring of public procurement. Based on the monitoring of 5.426 public procurement procedures, total value 138,364,947.59 KM (excluding VAT), the elements of risk were identified in 88.68% of monitored public procurements, and observed through monetary value, 96% of spending is risky. “We are talking about 133 million KM spent on risky public procurements,” said Slobodan Golubović, editor of the portal during presentation of the results on December 8, 2021.

The data show strong trends of corruption, discrimination and non-transparency in public procurement, and the most common mechanisms are conclusion of direct agreements to avoid more transparent procedures, public procurement without adequate planning, discrimination of bidders through the conditions defined in the tender documents. “The goal of this project is to directly involve citizens in the fight against corruption, because they are the ones who are most affected by corruption in Bosnia and Herzegovina. BiH citizens are victims of corruption. Public procurements are one of the main sources, the generator of corruption in BiH, which is quite logical because the money is there. We have pointed out those public procurements that are risky, i.e. which are susceptible to corruption”, said Eldin Karić, Executive Director of the Association CRMA .



Monitoring report is available at the portal Pratimo tendere, link:  
<https://www.pratimotendere.ba/bs-Latn-BA/articles/5316/predstavljen-godisnji-izvjestaj-o-pracenju-javnih-nabavki-skoro-90-tendera-oznaceno-kao-rizicno>

**PRATIMOTENDERE.BA**



**PRATIMO  
TENDERE**

# “GREEN FLAGS” OF PRATIMO TENDERE PORTAL AWARDED

The portal Pratimo tendere and the Association CRMA awarded prizes for good practices in public procurement. The winners of the “Green Flag” of the portal are the Public enterprise for Urban Transport of Passengers “Mostar bus” for lawful and good practice of public procurement planning; Public enterprise “Putevi Brčko” Brčko District of BiH for transparent and non-discriminatory tender documentation, Public Institution Gerontology Center Banja Luka for lawful and good practice of monitoring the implementation of the contract. By awarding of the “Green Flag” on the occasion of marking the International Anti-Corruption Day, portal “Pratimo tendere” symbolically honors public institutions and enterprises that have shown good anti-corruption practice in conducting public procurement.



## NEW MEMBERS OF THE MONITORING NETWORK

New members have joined the Public Procurement Monitoring Network. A group of volunteers has been continuously working on monitoring public procurement procedures since October 2021, and civil society organizations that were selected through a public call have joined them since December. The OCDs are: Center for Youth Activism Development (CROA), Association of Criminalists, Criminologists and Security Managers (KKMS) and the Association of Professionals, Trainers and Public Procurement Officers in BiH (UPTIS). The monitoring network identifies corruption, non-transparency and discrimination in public procurement through the portal Pratimo tendere, revealing to the BiH citizens how and where their money is spent.



**Monitor tenders, monitor your money!**

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

Facebook: [pratimotendere.ba](https://www.facebook.com/pratimotendere.ba)

Instagram: [pratimotendere.ba](https://www.instagram.com/pratimotendere.ba)

Twitter: [PratimotendereB](https://twitter.com/PratimotendereB)



## ANTI-CORRUPTION ACTIVITIES OF TRANSPARENCY INTERNATIONAL BIH

Following the request for monitoring the public procurement procedure for the hotel “Rajska dolina” of the Catering Service of the Government of Republika Srpska sent by Transparency International in BiH to the BiH Public Procurement Agency, which filed a report for “potential violation of the Public Procurement Law due to the existence of a probable crime” to the RS Public Prosecutor’s Office - Special Department for combatting corruption, organized crime and the gravest forms of economic crime. Apart from the RS Public Prosecutor’s Office, the information about the case was forwarded to the Basic Court in Banja Luka, i.e. the Department for Infringements, to which the Public Procurement Agency submitted a request to initiate infringement proceedings. As part of the cooperation with the USAID E-Government project, Transparency International in BiH had on October 5, 2021 in Sarajevo delivered a training to the civil society organizations and volunteers monitoring the implementation of public procurement procedures within the USAID project “Assistance to Citizens in the Fight against Corruption”. The topic of the training was Appeal Procedure in public procurement process. On the occasion of the International Anti-Corruption Day, Transparency International in Bosnia and Herzegovina organized a conference entitled “Reform Challenges in the Fight against Corruption in BiH”, which was held on Thursday, December 9, 2021 in Sarajevo.

“Authorities at all levels in Bosnia and Herzegovina are blocking legislative reforms in seven areas that are key to fighting corruption, and there are increasing attempts to make the situation worse,” was the main message sent from the conference.

Transparency International in BiH presented an interactive map of corruption reporting - [prijavikorupciju.org](http://prijavikorupciju.org) where the visitors can report corruption and gain insight into the status of their case. The platform consists of a corruption reporting form that provides the option of anonymity, but also a corruption reporting folder, which provides insight by the number, status and area of reporting.





# **PUBLIC CALL FOR PROJECTS LEADING CIVIC INITIATIVES AND CAMPAIGNS IN THE FIELD FIGHT AGAINST CORRUPTION**



## **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/>



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