

**Federation Road Asset Management Enhancement Project -
FRAME (P511815)**

**Resettlement Due
Diligence Review - RDDR
(Audit) and Resettlement
Action Plan - RAP**



2025.

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Abbreviations

B&H / BiH	Bosnia and Herzegovina
CH	Cultural Heritage
CHS	Community Health and Safety
CGC	Central Grievance Committee
CSOP	Construction Site Organization Plan
EA	Environmental Assessment
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
E&S	Environmental and Social
FIS	Federal Institute of Statistics
FBiH	Federation of Bosnia and Herzegovina
GC	Grievance Committee
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
LMP	Labor Management Plan / Procedures
OHS	Occupational Health and Safety
PAP	Project Affected Person
PC Roads of FBiH	Public Company Roads of Federation of BiH
PIMT	Project Implementation and Management Team
PDO	Project Development Objective
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
RDDR	Resettlement Due Diligence Report
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SE	Supervision Engineer
TCI	Total Condition Index
WB	World Bank

1. Project information¹

The *Federation Road Asset Management Enhancement Project (FRAME, P511815)* is financed through a World Bank loan and grant under the *Safe and Sustainable Transport Program (SSTP)*, and implemented by the Public Company Roads of the Federation of Bosnia and Herzegovina (PC Roads FBiH).

The **Project Development Objective (PDO)** is to *improve transport connectivity and enhance road network management, and, in case of an eligible crisis or emergency, to respond promptly and effectively to it.*

The Project is structured around the following components:

- Component 1.1. **Investments in a program of climate-resilient rehabilitation of priority national roads;**
- Component 1.2. **Road safety and resilience improvements;**
- Component 2.1. **Enhanced road sector asset management;**
- Component 2.2. **Enhanced sector finance and governance;**
- Component 3. **Contingent emergency response component.**

The Project will be implemented during the period **2025–2030**, and covers the **network of main roads in the Federation of Bosnia and Herzegovina**.

The rationale for the Project is to address long-standing needs for safer and more climate-resilient transport infrastructure, strengthen institutional capacity for modern asset management, and improve the overall efficiency and sustainability of the road sector in the Federation of Bosnia and Herzegovina.

1.1. Sub-Project information

The project titled “Reconstruction of the ‘North Entrance to Mostar’ Intersection” involves the reconstruction and geometric redesign of a critical traffic node located at the intersection of Main Roads M17 (section 014) and M17.4 (section 101) in the Zalik Neighborhood, City of Mostar, Federation of Bosnia and Herzegovina.

This location is positioned at a vital connection point between the Pan-European Corridor Vc (M17) and the urban road network leading directly into Mostar city center. The junction also lies in proximity to key facilities such as the INA fuel station, private access points, and residential buildings.

The existing intersection is currently configured as an at grade, three legged junction with limited traffic control and substandard geometric conditions. Sharp turning angles, poor visibility, wide curves, inconsistent signage, and unregulated access points contribute to its designation as a traffic black spot, with a documented history of frequent and severe traffic accidents.

The main objectives of the project are to:

- Enhance road safety for all users, including vehicles, pedestrians, and cyclists
- Improve traffic flow and reduce congestion at one of the main entrances to Mostar

¹ Data available from the Project Appraisal Document (PAD), prepared by the World Bank.

- Address hazardous traffic conditions and mitigate accident risks
- Upgrade the intersection to comply with modern design and safety standards
- Facilitate smoother access to regional and international transport corridors

The planned intervention includes the construction of a modern roundabout integrated with a cut and cover tunnel, designed to separate through and turning movements, reduce conflict points, and enable efficient and safe circulation. The new infrastructure will accommodate the existing Average Annual daily Traffic (AADT) of 13,868 vehicles, with capacity to absorb expected traffic growth over the coming years.

This sub-project is being implemented under the Federation Road Asset Management Enhancement Project (FRAME, ID P511815), with financial support from the World Bank. It is one of several priority interventions identified for reducing high risk locations and improving road safety across the Federation of Bosnia and Herzegovina.

1.2. Sub-project information (PAD)²

Mostar North junction is among the top five most unsafe locations on the FBiH road network as per the latest black spot analysis. At the location, the city road merges with the main road, i.e., the road M17.4 northern access road for the city of Mostar. The existing intersection is a T-intersection, with a left turn lane from the direction of Neum and Čapljina. The connection to the M17 from the direction of Mostar and the exit from the M17 from the direction of Neum are extremely unfavourable for all types of vehicles and, as such, represents a safety risk. Although there is traffic signage limiting the speed on the intersection segment, due to the large horizontal radius and the width of the traffic lanes on the segment of the intersection from the direction of Sarajevo towards Neum, vehicles often exceed the speed limit. The access roads for the petrol station and the private structures in the intersection zone pose additional safety challenge. The design solution consists of an intersection with a circular shape, with a tunnel below the newly-designed traffic surfaces. The roundabout has been designed with 4 branches: branch Mostar center, branch Sarajevo, branch Neum (Čapljina) and a branch for residential buildings up the road and the nearby hotel. The value of the roundabout's outer radius is $R=21.50$ m with an inner radius $R=15.0$ m. The width of the driving lane has been adopted at 6.5m, with another driving lane for oversized vehicles with a width of 2.0 m. Pedestrian traffic in intersection zone is handled by introduction of one-sided pedestrian path on the branch from the direction Mostar center – Neum on the branch segment towards the hotel. The width of the pedestrian path is 1.6m. A separate branch running below the main road M17 has been predicted from the direction of Mostar to Sarajevo by building a tunnel using the system "Cut and Cover". The tunnel has been designed to a length of 150 m, in compliance with the possibility of its adequate backfilling. The entrance portal is positioned immediately before the intersection with the branch roundabout – Čapljina, while the exit portal is positioned behind the access roads for private residential buildings and the hotel. The design has been considered solid but has not been yet subject to RSA, which might indicate some additional safety improvements.

1.3. Status of Expropriation

The expropriation process for the "North Entrance to Mostar" sub-project is ongoing and consists of both completed and pending activities. A number of land plots have already been expropriated;

² Data available from the Project Appraisal Document (PAD), prepared by the World Bank.

however, additional parcels still need to be acquired in order to enable full implementation of the approved design solution.

An Urban Planning Permit was initially issued on 29.01.2021 under reference number UP-I-07/2-19-13974/20. Upon review of the document, it was noted that the City of Mostar Urban Planning Department had omitted certain cadastral parcels in point 1 of the decision. As a result, a correction was requested, and a revised Urban Planning Permit was issued on 26.05.2021 under reference number UPI-07/2-19-13974/20-1.

Following the issuance of the revised permit, the process of expropriation commenced. Certain challenges were encountered with specific plots, including difficulties in reaching agreements with some landowners, as well as technical considerations related to underground fuel storage tanks and associated infrastructure belonging to the INA fuel station. In order to avoid impacts on this infrastructure, modifications to the project design were introduced. Consequently, a further adjustment of the Urban Planning Permit became necessary.

According to applicable legislation, an Urban Planning Permit may only be amended once. Since the first amendment resulted from an omission made by the City of Mostar, there was no legal mechanism to accommodate a second amendment. Therefore, it was necessary to initiate a new procedure for the issuance of a permit. The City of Mostar issued a Consent (No. 02-23-222/23) on 05.01.2023 for the newly presented technical design solution, and subsequently, a formal request for a new Urban Planning Permit was submitted on 16.03.2023. The procedure for the issuance of this new permit is currently ongoing.

In line with this request, the land parcels listed in Annex A are a Summary of Acquired Parcels and in Annex B are subject to expropriation. These parcels, together with those already acquired, are analyzed in detail within this RDDR. Annex B contains the updated list of plots to be expropriated, while point 4. Socio-Economic Survey provides the socio-economic analysis of the affected land and asset owners.

The RDDR assesses past land acquisitions and resettlement activities for sub-projects under the FRAME Project, determining compliance with national legislation and the World Bank ESS5. It identifies gaps and recommends corrective actions where necessary.

Field	Details
Sub-project Name	"Reconstruction of the 'North Entrance to Mostar' Intersection"
Location / Municipality	Mostar
Cadastral Parcels that where expropriated:	91, 90, 89, 32/6, 40/2, 88/2, 59/1, 41/2, 88/3, 87/2, 39/2, 59/5, 73/2, 74/2, 33/2, 2096, 93, 118, 92, 32/4, 31/2, 32/5
Total number of parcels that where expropriated:	22
Total number of parcels pending expropriation (including full, partial, and temporary expropriation):	10
Implementing Agency	PC Roads of FBiH
Date of Land Acquisition / Expropriation	10.01.2022.-05.01.2023.
Type of Land Acquisition	Expropriation

2. Description of Land Acquired and impacts

Item	Details
Land Use Prior to Acquisition	The land was not used for any particular purpose as it was located alongside the main road
Area Acquired (m ² / ha)	12.799 m ² / ≈ 1,28 ha
Number of Affected Persons (if any)	16
Type of Impacts	Economic displacement - on a small portion parcels with olive trees/ None – for the majority of parcels
Assets Lost (Structures, Crops, Trees, Other)	No structures, on 3 parcels: crops/trees, no other losses.
Notes / Observations	All affected plots are located along the main road, with no physical displacement. In most cases, the land was unused. Minimal impacts relate to the loss of several crops/trees. Compensation for expropriated land was carried out in line with national legislation.

The acquisition process covered a total of **12,799 m² (≈1.28 ha)** of land situated along the main road. The majority of the land was unused prior to acquisition, with the exception of a few parcels where olive trees and minor crops were planted. In total, **16 individuals and entities** were formally recorded as affected through the expropriation process, including both private landowners and public land.

No physical displacement occurred as there were no residential or commercial structures present on the affected plots. The impacts are therefore limited to **economic displacement**, primarily associated with the loss of several crops and trees on three parcels, while all other parcels involved only transfer of ownership of unused land. No restrictions on access were reported.

Overall, the scale of impacts is considered **minor**. Compensation was provided in line with national legislation, ensuring that affected persons received adequate payments for the expropriated land and assets. Consistency with **ESS5 requirements** will be further confirmed through the preparation of site-specific RAPs for remaining parcels.

3. Eligibility, Compensation, and Entitlement Matrix

3.1. Cut-off Date

In this project, instead of an universal cut of date, the date is individual for each parcel and is the date of the onsite verification that happened between December of 2021. and April 2023. due to inconsistencies between land registry records and actual ownership of parcels. So eligibility for compensation and assistance was determined through on-site verification. Each affected person (PAP) was individually identified, consulted, and informed of their rights during the field survey.

For the project section implemented under the existing regulatory plan, stakeholders were also involved through a public call and community presentations, including a public consultation meeting, ensuring that PAPs were aware of the project and its potential impacts prior to expropriation. These consultations, held in late 2020 and mid-2021, confirmed that the main concerns of affected persons

related to maintaining safe and reliable access to their properties, especially residential homes and business premises. Participants emphasized the need for clarity on how access would be arranged during and after construction. The Project team, together with the City authorities, assured PAPs that access to residential properties would be preserved at all times, while connections to business properties would be secured in line with road safety requirements.

Although preliminary discussions were already held with some affected persons, the formal cut-off date for eligibility will only be established following the issuance of the new urban permit and the declaration of public interest. This cut-off date will be aligned with the completion of the census and socio-economic survey of Project Affected Persons (PAPs) and the inventory of affected assets. Only those persons and assets identified as of this date will be eligible for compensation and assistance, in accordance with World Bank ESS5 requirements.

3.2. Compensation and entitlements

For the Project, all Project-Affected Persons (PAP) who experience losses due to land acquisition, restriction of access, or resettlement will be entitled to fair and timely compensation in accordance with the applicable Federation of Bosnia and Herzegovina (FBiH) legislation and the World Bank Environmental and Social Standard 5 (ESS5). Eligibility is established based on the cut-off date as defined in section 3.1. of this document, including formal legal owners, recognized claimants under national law, and informal occupants without recognized rights. Compensation and assistance aim to fully restore or improve livelihoods and living standards to pre-displacement conditions. Entitlements are categorized as follows:

- **Loss of land (permanent acquisition):** Formal owners and recognized claimants will receive compensation at full replacement cost, covering all related costs. Informal occupants will be provided with resettlement and livelihood restoration assistance.
- **Loss of residential or commercial structures:** Owners and occupants are entitled to compensation at replacement cost, relocation assistance, and support for business re-establishment where relevant. – Not applicable for this subproject
- **Loss of crops, trees, and other assets:** Compensation at fair market value will be provided, based on asset type and productive value.
- **Temporary land use:** Compensation will cover loss of use during the temporary occupation period, and land will be restored post-occupation. – Not applicable for this subproject.
- **Restricted access to land or resources:** PAPs losing access to communal, customary, or other resources will be compensated or offered alternative access.
- **Livelihood impacts:** Assistance such as job training or business support will be available for persons losing income or economic opportunities. – Not applicable for this subproject
- **Vulnerable groups:** Additional targeted support will be provided to ensure equitable treatment of vulnerable households.

A detailed Entitlement Matrix outlining eligibility and compensation measures is provided in 3.2.1. of this document. This matrix ensures transparent, consistent, and fair implementation of compensation throughout the FRAME Project.

3.2.1. Entitlement Matrix (Project-affected Persons – PAPs)

Type of Loss / Impact	Affected Person(s)	Entitlement / Compensation	Remarks
1. Permanent Loss of Land	Formal owners and recognized claimants	Full replacement cost compensation including land value, registration fees, taxes, and transfer costs.	Compensation paid prior to land acquisition.
2. Loss of Crops, Trees, and Other Assets	Land users and owners	Compensation at current market value based on crop/tree type and productive value; replacement or cash compensation options.	Includes perennial and seasonal crops.
3. Temporary Land Occupation	Landowners and users	Compensation for loss of use during occupation period; restoration of land to original condition after use.	Based on duration and impact of occupation.
4. Restricted Access to Land or Resources	Individuals or communities with access rights	Compensation or provision of alternative access or resources to mitigate loss of access.	Includes communal, customary, or traditional rights.

4. Socio-Economic Survey

4.1. PAPs already affected by expropriation

Survey Coverage

The socio-economic survey was conducted to assess the concerns and feedback of landowners affected by the expropriation process for the project. Out of a total of 16 different landowners were identified, and surveys were successfully carried out with 8. One parcel is co-owned by five individuals, which, when treated as one ownership unit, reduces the effective number of landowners to 12. Among these, two landowners currently have temporary representatives whose addresses remain unknown, which prevented their participation at this stage. Of the eight respondents, six were visited in person on 19 September 2025, while two were interviewed via email. Attempts were also made to contact two additional landowners through field visits and inquiries with the local municipal administration, but without success. These people will be interviewed before expropriation is finalised

Key Concerns Raised

The surveyed landowners raised several issues. Two expressed concerns about whether access to their parcels would be guaranteed under the revised project design, while one additionally raised concerns regarding sewage connections, as assurances had been given during the initial expropriation process that this would be resolved within the project. These concerns were clarified during the survey, with explanations provided regarding guaranteed access to residential properties and confirmation that sewage connections are covered under the current project design. Respondents expressed satisfaction with these clarifications. However, several participants voiced dissatisfaction with the lack of timely updates. It was explained that once the urban permit is issued, the project will be presented publicly and subject to formal consultations, which was accepted as reasonable by the landowners.

Compensation and Livelihoods

Beyond these concerns, all of the respondents confirmed that they had received full compensation for expropriated assets in line with agreements and expressed satisfaction with the fairness and transparency of the process. Owners who had fruit and vegetable crops on their parcels confirmed that they were satisfied with the additional compensation provided for agricultural losses. None reported negative impacts on their subsistence, as all continued cultivation on other plots they owned, maintaining the same level of self-sufficiency as before.

4.2. PAPs yet to be affected by expropriation

Future Expropriations

The above findings relate to parcels already expropriated under the previous urban and project design. With respect to the new set of parcels subject to expropriation under the updated urban plan (application submitted, currently pending approval), there are ten parcels—three public and seven private—corresponding to four private ownership entities (two companies and two individuals). One company, already expropriated during the initial phase, was consulted again and expressed willingness to accept the new expropriation, albeit reiterating concerns about sewage and access for both residential and business premises. Two individual landowners could not be approached at this stage due to discrepancies between land registry and cadastre records, with ownership to be

determined during the expropriation proceedings. Discussions with the second company have been postponed, as the new project design differs significantly from the earlier version and the regulatory plan has yet to be adopted. Once the regulatory plan and urban permit are finalized, targeted consultations will be undertaken with these owners, in addition to public hearings.

4.3. Conclusion

Overall, the survey results indicate that the landowners are satisfied with the compensation process and supportive of the project. Concerns were largely centered around information flow, access to parcels, and sewage infrastructure, all of which can be effectively addressed through continued stakeholder engagement, transparent communication, and integration of technical clarifications into the upcoming public consultation process.

5. Compliance Review

Criteria	Assessment	Evidence / Remarks
Was the acquisition conducted in accordance with national law?	Compliant	Expropriation was carried out by the competent authorities in line with the national Expropriation Law. Supporting documents: contracts, court/expropriation decisions, cadastral extracts.
Was compensation paid at replacement cost?	Compliant	Compensation was paid as per court/expropriation decisions in monetary value consistent with market rates. Payment receipts available.
Were grievance mechanisms available and functional?	Compliant	Avenues for appeal and complaints existed through the administrative and court system; several affected persons used these mechanisms in line with national procedures.
Were vulnerable groups identified and adequately considered?	Partially	No specific vulnerability assessment was conducted; however, no evidence of particularly vulnerable groups among the affected persons was identified.
Were any expropriation procedures or compensation delayed?	Partially	One expropriation involved a parcel with five owners whose addresses were unknown, as well as one more which has one owner. The court appointed a temporary legal representative until the owners come forward. Funds for compensation will be placed in a separate escrow account, covering the court expert valuation plus 40%. All other parcels were compensated on time.

Were there any disputes or unresolved claims?	Yes (minor, resolved)	A few disputes were raised by affected landowners regarding compensation amounts. These were resolved by adjusting the expropriation payments to reflect the owners' requests for higher valuations.
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The review of expropriation procedures for the parcels already acquired under the FRAME Project indicates that, overall, the process was largely compliant with national legislation and the principles of ESS5. All expropriations were carried out under the applicable national Expropriation Law, with supporting documentation available including court decisions, cadastral extracts, and contracts. Compensation payments were made in line with assessed market values, and in most cases were completed on time.

Two expropriation involving owners with unknown addresses required the appointment of a temporary legal representative by the court. Funds for compensation for these parcels will be deposited into a dedicated escrow account, covering the court expert valuation plus 40%, ensuring that the affected owners will receive due compensation once they come forward.

Minor disputes arose from a few affected landowners concerning the amount of compensation. These requests were resolved in accordance with **Article 47 of the Expropriation Law**, by adjusting payments to reflect the requested increases in expropriation values. All claims are now closed.

Grievance mechanisms were available and functional through the administrative and judicial system, allowing affected persons to raise concerns, although no significant issues were reported. Vulnerable groups were not formally identified during the initial expropriation, but no evidence suggests that any particularly vulnerable individuals or households were adversely affected.

Overall, while a small number of parcels required special arrangements due to absentee owners and minor disputes, the expropriation process is considered **largely compliant**, with all identified issues addressed or mitigated.

6. Stakeholder Engagement Review

Item	Assessment / Notes
Consultations with affected persons	Partially conducted – Some consultations were held with directly affected landowners prior to expropriation; for absentee owners, legal representatives were involved. Meeting minutes and notifications are available.
Involvement of host communities (if relevant)	Not applicable
Records of grievances and resolutions	Maintained and resolved – A few disputes were raised regarding compensation amounts and were resolved in line with Article 47 of the Expropriation Law, adjusting payments where requested. Evidence includes amended payment records and court/expropriation decisions.
Evidence of informed consent for voluntary donations	Not applicable – All land acquisitions were conducted through expropriation; no voluntary land donations were used for these parcels.

7. Gap Analysis and Corrective Actions

7.1. Gaps and Mitigating Measures³

While the national legal framework in FBiH provides a generally sound basis for addressing land acquisition and property rights, several gaps exist when compared to the World Bank's ESS5. The FRAME Project will follow the **stricter requirements of WB ESS5**, depending on which is more protective of affected persons.

Area	National Legal Framework	ESS5 Requirement	Mitigating Measures for FRAME
Compensation eligibility	Only formal legal owners or those with legal claims are eligible.	Includes formal owners, informal users, and those with no legal rights.	FRAME RPF ensures that all categories of displaced persons per ESS5 are identified and compensated or assisted.
Livelihood restoration	Focus is on compensation for land/assets; livelihood support not explicitly required.	Requires support to restore or improve livelihoods of affected persons.	FRAME sub-projects will include livelihood restoration measures as needed.
Vulnerable groups	No specific provisions.	Requires identification and additional support for poor or vulnerable persons.	FRAME RPF includes provisions to identify and assist vulnerable people.
Public participation	Limited requirements for consultation.	Requires meaningful consultation, disclosure, and participation.	Public engagement and disclosure will be integrated into sub-project planning and implementation.
Grievance mechanism	No formal requirement for a project-level GM.	Requires accessible and transparent GM for displaced persons.	FRAME will ensure an operational GM is in place throughout the project cycle.
Monitoring and evaluation	No requirement for monitoring of outcomes.	Requires monitoring of resettlement outcomes and impacts.	FRAME will include M&E mechanisms in site-specific RAPs if needed.

7.2. Corrective Actions

Identified Gap (vs. ESS5)	Recommended Corrective Action	Responsible Party	Timeline
Vulnerable groups not formally identified prior to expropriation	Conduct socio-economic assessment for remaining parcels; identify vulnerable households and	PIMT	Before RAP preparation for remaining parcels

³ Data available from the Resettlement Policy Framework (RPF), prepared by the PC Roads FBiH.

	provide appropriate measures		
Limited stakeholder consultation with absentee owners	Engage through legal representatives; document all communications and ensure affected persons are informed	PIMT	Ongoing for absentee owners
Compensation process partially misaligned with ESS5 replacement cost principle	Maintain escrow funds for absentee owners and adjust payments where required to meet replacement cost standards	PIMT	Ongoing until owners claim funds
Minor disputes regarding compensation not initially resolved per ESS5	Apply Article 47 adjustments; ensure documentation of all resolutions and confirm payments align with ESS5	PIMT	Completed; documentation archived
No systematic verification of compliance with ESS5 for prior expropriations	Conduct RDDR for all already expropriated parcels to confirm compliance and document lessons learned	PIMT	Completed

8. Conclusions

Overall Compliance:

The review of expropriation procedures for parcels acquired for the **Reconstruction of the ‘North Entrance to Mostar’ Intersection** prior to the involvement of the World Bank indicates that the process was largely compliant with both **national legislation** (Law on Expropriation of FBiH) and the **World Bank ESS5** requirements. Compensation was generally provided in line with assessed values, grievance mechanisms were available, and affected persons were consulted where possible. Minor deviations were identified, primarily related to absentee owners and a few disputes over compensation amounts, which were resolved in accordance with the Expropriation Law (Article 47).

Recommendations / Corrective Actions (CAPs):

Maintain funds in escrow for parcels with absentee owners until they claim compensation.

Ensure documentation of consultations and engagement through legal representatives for absentee owners.

Confirm and document that all minor disputes over compensation have been fully resolved.

Conduct a socio-economic review of the remaining parcels to identify any vulnerable households and ensure ESS5 compliance.

Sub-Project Implementation:

Based on the findings of this RDDR, **the sub-project of FRAME can proceed** on the parcels acquired prior to World Bank involvement **without the need for additional compensations**, provided that the above corrective actions are implemented and monitored by the PIMT. For the remaining parcels where expropriation or acquisition has not yet occurred, this RAP sets out the procedures and measures to ensure compliance with World Bank ESS5..

9. Grievance Redress Mechanism (GRM)

9.1. Grievance Redress Mechanism (GRM) for Previously Expropriated Persons

For the Mostar sub-project, the land acquisition process had already been completed prior to project implementation. Therefore, affected persons did not have access to the Grievance Redress Mechanism (GRM) that is provided under the RPF and SEP for any new expropriations. Instead, their concerns were addressed through direct communication with the City authorities (Department of Urbanism), who served as the main channel for receiving and forwarding complaints to the Project Implementation Unit. In practice, one-on-one consultations were carried out with each landowner during the expropriation process, and all issues were discussed directly on site. Although no formal written records of these grievances exist, the socio-economic survey conducted confirms that the affected persons expressed satisfaction with the overall process. The main concerns raised related to maintaining access to the main road. Affected households were assured that both legally and morally, the Project is obliged to ensure continued access to residential properties. For business properties, direct access to the main road will only be allowed where no local or service road is available, in order to ensure higher road safety standards.

9.2. GRM for PAP's that will be expropriated

The Grievance Mechanism (GM) serves as a platform for receiving, addressing, and managing complaints, comments, and suggestions related to the Project. Its primary goal is to ensure an efficient means of addressing grievances. As per World Bank outlined in ESS10, each project must establish such a mechanism early in the project preparation stage to promptly address specific issues.

The Project has developed a grievance mechanism to record and monitor all grievances systematically. This initiative aims to enhance transparency and accountability while minimizing the risk of adverse environmental and social impacts.

The Project's GM is comprised of two tiers: Grievance Committees (GCs) established and managed by the PC Roads FBiH, and a Central Grievance Committee (CGC) overseen by the Federal Ministry of Transport and Communication, commonly known as the Project's Grievance Mechanism.

To ensure access to the GM, potential beneficiaries, communities, and other stakeholders can submit grievances through specified channels. The GM will facilitate ongoing feedback on project activities and provide resolutions for individual grievances during implementation. Thus, the GM will serve as both an information center and grievance mechanism at the project level, accessible to all affected by project components and relevant to local communities impacted by project activities.

The GM will handle grievances and comments from the following groups: individuals or entities directly affected by the project, potential beneficiaries, those impacted by land acquisition and resettlement, stakeholders with an interest in the project, and residents or communities affected by project activities.

Furthermore, legal remedies available under national legislation, such as courts, inspections, and administrative authorities, will remain accessible.

However, the grievance mechanism for project workers required under ESS2 will be provided separately, with details outlined in the Labor Management Procedure.

Despite the Project's low assessed risk of Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) the GM will be equipped to address SEA/SH grievances as a precautionary measure. These grievances will be managed separately by trained experts, following the same process value chain and timeframes detailed in Chapter 9.2.2.

PC Roads FBiH is responsible for establishing operational GMs and informing stakeholders about their roles, contact persons, and complaint procedures in affected areas. Information regarding the GM will be disseminated through various channels, including the websites of the PC Roads FBiH, social media campaigns, and leaflets detailing the GM process.

9.2.1. Raising Grievances

Efficient grievance management hinges on a set of core principles crafted to uphold the fairness of both the process and its outcomes. The grievance procedure is designed to be accessible, efficient, straightforward, comprehensible, and free of charge for the complainant. Any grievance can be brought to the attention of the GM in person, via telephone, or in writing by completing the grievance form online, or by sending it via email, post, fax, or personal delivery to the designated addresses. Anonymity is maintained for all grievances, and details regarding admission points will be widely disseminated as part of awareness-building efforts. A sample grievance form is provided in Annex E of this document for reference.

9.2.2. Grievances Administration

Grievances will be handled and managed at the initial tier grievance level – the Grievance Committees (GCs). Each grievance must follow a set of mandatory steps: receipt, assessment and assignment, acknowledgment, investigation, response, follow-up, and closure.

Upon receipt, the GM will swiftly conduct an initial assessment to ascertain the nature and severity of the grievance. Within three days of receiving the grievance, the GM will acknowledge its registration and provide the grievant with basic next steps. Subsequently, the GM will delve into the issue from the perspective of the grievant, aiming to understand their concerns and desired actions. It will then proceed to investigate the facts and circumstances, providing a final decision to the grievant no later than 15 days after the grievance was lodged. Closure of the grievance occurs once the implementation of the resolution has been confirmed. Even in cases where no agreement is reached or the grievance is rejected, all efforts and actions taken toward resolution will be documented.

For anonymous grievances, after acknowledgment within three days of logging, the GM will investigate the grievance and issue a final decision within 15 days of logging, which will be disclosed on the PC Roads FBiH website.

The GM will maintain a grievance register log, documenting grievances received through all admission channels while protecting the personal data of each grievant under the Law on Personal Data Protection. Each grievance will be recorded in the register with essential details including a description of the grievance, date of acknowledgment returned to the grievant, actions taken (such as investigation or corrective measures), date of resolution or provision of feedback, verification of implementation, and closure.

If a grievance cannot be satisfactorily resolved, the grievant has the right to appeal. The Central Grievance Committee (CGC) will handle such appeals, serving as the second-tier grievance level. The CGC will acknowledge receipt of the appeal, including a detailed explanation of the resolution process and the final decision, along with guidance if the outcome is still unsatisfactory to the grievant.

If resolution cannot be achieved through the CGC, the grievant may resort to formal judicial procedures available under the legal framework of FBiH. Logging a grievance with the GM does not prevent seeking resolution from official authorities, judicial or otherwise, at any time as provided by the FBiH legal framework.

9.2.3. Grievance and Beneficiary Feedback Reporting

In addition to addressing grievances, the GM will also be responsible for retaining and organizing comments/grievances received and maintaining the Central Grievance Log, which will be administered by the E&S Specialist. To ensure a comprehensive understanding of this tool and its outcomes, updates from the GM will be accessible on the websites of the PC Roads FBiH. These updates will be regularly refreshed and will provide a breakdown by gender and type of grievances.

9.2.4. Grievance Log

PC Roads FBiH will maintain the Central Grievance Log to ensure that each grievance is assigned an individual reference number and is accurately tracked and recorded until actions are completed. When receiving feedback, including grievances, the following information will be defined:

- Type
- Category
- Deadline for resolving the appeal
- Agreed action plan

The log will contain the following details:

- Name of the grievant, location, and details of the grievance
- Date of submission
- Date when the Grievance Log was uploaded onto the project database
- Details of proposed corrective action
- Date when the proposed corrective action was sent to the grievant (if appropriate)
- Date when the grievance was closed out
- Date when the response was sent to the grievant

9.2.5. Grievance Admission Channels

Any grievance can be brought to the attention of the GM by completing the grievance form either in hard copy or online, or in any other preferred format by the grievant. A sample grievance form is provided in Annex B. Grievances of any type can be submitted by mail, fax, phone, email, or in person using the following access details:

Attention: PIMT, Workers' Grievance Mechanism

Address: Terezija br. 54, 71000 Sarajevo

Phone: +387 33 250 370; Fax: +387 33 250 400

E-mail: info@jpcfbih.ba

<https://jpcfbih.ba/bs/kontakt>

This avenue will be utilized until the aforementioned GMs are established. Details regarding each GC will be provided at later stages and disseminated accordingly. Information on these details will be incorporated into the Engagement Strategy and will be published following the information disclosure procedure outlined in this document.

9.2.6. *Monitoring and Reporting on Grievances*

The Grievance Committee (GC) will have the following responsibilities:

- Collecting, summarizing, and analyzing grievances, acting as local entry points for recording the quantity, substance, and status of complaints, and inputting them into the Project GM database.
- Monitoring unresolved issues and recommending actions for their resolution.
- Compiling reports on GM activities.
- Maintaining the Central Grievance Log.

The Central Grievance Committee (CGC) will be tasked with:

- Addressing grievances that were not satisfactorily resolved at the GC level.

PC Roads FBH will be responsible for including a section related to GM in the monitoring reports submitted to the World Bank. This section will provide updated information on the following:

- Status of GM implementation, including procedures, training, public awareness campaigns, and budget allocation.
- Qualitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback) and the number of resolved grievances.
- Quantitative data on the types of grievances received and responses provided, as well as issues addressed and grievances that remain unresolved.
- Level of satisfaction with the measures taken in response.
- Any corrective actions implemented.

9.2.7. *WB Grievance Redress System*

Communities and individuals who believe that they are adversely affected by a WB-supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of non-compliance with WB policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been allowed to respond. For information on how to submit complaints to the WB's corporate Grievance Redress Service (GRS), please visit

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the WB Inspection Panel, please visit

www.inspectionpanel.org.

10. ANNEXES

Annex A – Summary of Acquired Parcels – North Entrance to Mostar Intersection

No.	Cadastral Borough	Land Plot No.	Land Use Type	Public / Private Ownership	Complete / Partial Acquisition	Total Area of Plot (m ²)	Total Affected Area (m ²)	Structures on Land	Other Assets (trees, crops, etc.)	Affected Auxiliary Assets	Other Assets on Land (unaffected)	Physical Displacement (Yes/No)	Notes
1	Mostar I	91	Arable Land	Private	Complete	198	198	None	None/Minimal crops	None	None	No	-
2	Mostar I	90	Arable Land	Private	Complete	188	188	None	None	None	None	No	Crops and trees
3	Mostar I	89	Arable Land	Private	Complete	227	227	None	None	None	None	No	-
4	Mostar I	32/6	Vineyard	Private	Partial	17	17	None	Trees/Crops	None	None	No	Article 47
5	Mostar I	32/6	Vineyard	Private	Partial	23	23	None	Trees/Crops	None	None	No	Article 47
6	Mostar I	40/2	Arable Land	Private	Complete	121	121	None	None	None	None	No	-
7	Mostar I	88/2	Construction Site	Private	Complete	500	500	None	None	None	None	No	Article 47
8	Mostar I	59/1	Meadow	Private	Complete	561	561	None	None	None	None	No	-

9	Mostar I	41/2	Arable Land	Private	Complete	37	37	None	None	None	None	No	-
10	Mostar I	88/3	Construction Site	Private	Complete	186	186	None	None	None	None	No	Article 47
11	Mostar I	87/2	Orchard	Private	Complete	45	45	None	Trees/Crops	None	None	No	Article 47
12	Mostar I	39/2	Access Road	Private	Complete	28	28	None	None	None	None	No	Owners unknown, temporary legal representative appointed
13	Mostar I	59/5	Meadow	Private	Complete	107	107	None	None	None	None	No	Owners unknown, temporary legal representative appointed
14	Mostar I	73/2	Meadow	Private	Complete	76	76	None	None	None	None	No	Only parcel with formal grievance ended up going to court, resolved - crops or trees

15	Mostar I	74/2	Mea dow	Private	Complete	11	11	None	None	None	None	No	trees
16	Mostar I	59/7	Mea dow	Private	Complete	534	534	None	None	None	None	No	discontinued
17	Mostar I	65/2	Yard	Private	Complete	46	46	None	None	None	None	No	discontinued
18	Mostar I	33/2	Uncl assifi ed Road	Public	Complete	2	2	None	None	None	None	No	-
19	Mostar I	2096	Uncl assifi ed Road	Public	Complete	1,538	1,538	None	None	None	None	No	-
20	Mostar I	93	Stree t	Public	Complete	6,712	6,712	None	None	None	None	No	-
21	Mostar I	118	Uncl assifi ed Road	Public	Complete	2,142	2,142	None	None	None	None	No	-
22	Mostar I	92	Uncl assifi ed Road	Public	Complete	835	835	None	None	None	None	No	-
23	Mostar I	32/4	Vine yard	Private	Complete	146	146	None	None	None	None	No	crops
24	Mostar I	31/2	Cons tructi on Site	Private	Complete	28	28	None	None	None	None	No	crops
25	Mostar I	32/5	Vine yard	Private	Complete	71	71	None	None	None	None	No	-

The parcels acquired for the reconstruction of the 'North Entrance to Mostar' Intersection were primarily privately owned and located along the main road. Most parcels were classified in the cadaster as arable land, meadow, vineyard, or construction site; however, in reality, the land was largely unused and did not support active agricultural or commercial activities. Physical displacement did not occur on any parcel, and impacts were generally limited to land acquisition.

Losses of crops or trees occurred on a limited number of parcels (Nos. 2, 14, 15, and 24). Parcels 4, 5, 7, 10, and 11 had adjustments to compensation amounts in accordance with Article 47 of the Expropriation Law. Parcels 12 and 13 are owned by individuals whose addresses are unknown and have temporary legal representatives appointed to handle compensation. Parcel 14 was the only parcel with a formal grievance that required court intervention, which was resolved successfully. Parcels 16 and 17 were originally identified for expropriation. However, following the submission of grievances by the respective owners and the subsequent recognition that the project design would be revised, the expropriation process for these parcels was discontinued. Under the revised design, if required, these parcels may be subject to temporary expropriation.

All other parcels were acquired without dispute, grievance, or significant impact to land use. No structures were affected, and auxiliary assets on the majority of parcels were either absent or minimal. Overall, the acquisition process complied with national legislation, and any remaining issues will be addressed through RAPs for the relevant parcels.

Annex B – Summary of Parcels that need to be Acquired – North Entrance to Mostar Intersection

No	Cadastral Borough	Land Plot No.	Land Use Type	Public / Private Ownership	Complete / Partial Acquisition	Total Area of Plot (m ²)	Total Affected Area (m ²)	Structures on Land	Other Assets (trees, crops, etc.)	Affected Auxiliary Assets	Other Assets on Land (unaffected)	Physical Displacement (Yes/No)	Notes
1	Mostar I	59/7	Meadow, 2nd class	Private	Complete	534	534	None	None	None	None	No	
2	Mostar I	26	Unclassified road	Public	Partial	1955	76	None	None	None	None	No	
3	Mostar I	109	Unclassified road	Public	Complete	733	741	None	None	None	None	No	
4	Mostar I	38/1	Pasture, 2nd class	Private	Partial	2487	431	None	None	None	None	No	
5	Mostar I	115/1	Infertile land / Barren land	Public	Partial	691778	3474	None	None	None	None	No	
6	Mostar I	94/1	Commercial building and yard	Private	Partial	14602	356	Commercial building	None	None	None	No	
7	Mostar I	95	Meadow, 2nd class	Private	Complete	597	600	None	None	None	None	No	
8	Mostar I	51/1	Arable land	Private	Partial	537	4	None	None	None	None	No	

			(field), 3rd class										
9	Mostar I	59/7	Meadow	Private	Temporary expropriation	534	534	None	None	None	None	No	
10	Mostar I	65/2	Yard	Private	Temporary expropriation	46	46	None	None	None	None	No	

Annex C: QUESTIONNAIRE FOR LAND OWNERS OR USERS (already expropriated)

(For the purposes of the FRAME Project – P511815)

Survey date: _____

Start time: _____ h, _____ min

Enumerator's name: _____

Number and location of expropriated land (FRAME Project section):

Respondent's name: _____

Contact phone: _____

EXPROPRIATION DATA

Question	Answer
1. Was the entire plot expropriated or only a part?	<input type="checkbox"/> Entire plot <input type="checkbox"/> Part of the plot
2. Area of expropriated part	_____ m ²
3. Did you lose any other property (structures, fences, wells, etc.)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Purpose of these structures	_____
– Construction status	<input type="checkbox"/> With permit <input type="checkbox"/> Without permit
4. Did you receive the full compensation?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Type of compensation	<input type="checkbox"/> Cash <input type="checkbox"/> Replacement land
– If cash: Are you satisfied with the compensation amount?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– If NO (did not receive in full): Reason	_____

REPLACEMENT OR NEW LAND

Question	Answer
5. If you received cash compensation, did you purchase new land?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Area of new plot	_____ m ²
– Location	_____
– Additional costs (taxes, fees) not reimbursed	<input type="checkbox"/> YES <input type="checkbox"/> NO if YES: _____
6. If you received replacement land: Are you satisfied?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Is the new plot equal in quality and size?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Area of new plot	_____ m ²
– Were you able to negotiate the location?	<input type="checkbox"/> YES <input type="checkbox"/> NO

ADDITIONAL EXPROPRIATION

Question	Answer
7. Did you request expropriation of other nearby plots?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– If YES: Was the request approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Area of additionally expropriated land	_____ m ²

Question	Answer
– Are you satisfied with the outcome?	<input type="checkbox"/> YES <input type="checkbox"/> NO

USE OF THE PLOT BEFORE EXPROPRIATION

Question	Answer
8. Was the plot used for agricultural purposes?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Crops/plantations	_____
– Purpose of use	<input type="checkbox"/> Own needs <input type="checkbox"/> Sale/extra income
– If income: Registered agricultural producer?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Did you receive compensation for crops and trees?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– Did you continue farming elsewhere?	<input type="checkbox"/> YES <input type="checkbox"/> NO if NO: why? _____
9. Was the land used by anyone other than the owner?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– If YES: Who, purpose, duration, and whether compensation was received	_____

HOUSEHOLD DATA

Question	Answer
10. Number of household members	_____
11. Are there vulnerable categories in the household?	<input type="checkbox"/> YES <input type="checkbox"/> NO
– if YES: <input type="checkbox"/> Children <input type="checkbox"/> Elderly <input type="checkbox"/> People with Disabilities	
<input type="checkbox"/> Single parent household	
<input type="checkbox"/> Other: _____	
– Were their needs taken into account?	<input type="checkbox"/> YES <input type="checkbox"/> NO

INFORMATION AND INCOME

Question	Answer
12. Satisfaction with information during expropriation process	<input type="checkbox"/> 1 – Fully satisfied <input type="checkbox"/> 2 – Partially <input type="checkbox"/> 3 –Dissatisfied
– If 2 or 3: Why and what could have been improved	_____ _____
13. Main source of household income	<input type="checkbox"/> Employment <input type="checkbox"/> Agriculture <input type="checkbox"/> Pension <input type="checkbox"/> Other: _____
14. Impact of expropriation on household income	<input type="checkbox"/> 1 – No impact <input type="checkbox"/> 2 – Positive <input type="checkbox"/> 3 –Negative
– Explanation	_____

COMMENTS (for the enumerator)

Enumerator's comments and observations: _____

Survey end time: _____ h, _____ min

Verified by (signature): _____

Verification date: ____ . ____ . 2025.

Coordinator's comment: _____

Annex D: QUESTIONNAIRE FOR LAND OWNERS OR USERS

(For the purposes of RAP preparation – FRAME Project, P511815)

Date of interview: _____

Start time of interview: _____ h, _____ min

Enumerator's name: _____

Land plot number and location (FRAME Project sub-section): _____

Respondent's name: _____

Contact phone: _____

1. LAND AND PROPERTY DATA

Question	Answer
1. Respondent's status in relation to the land	<input type="checkbox"/> Owner <input type="checkbox"/> User (If user: relation to owner) _____
2. Total area of the plot	m ²
3. Are there any structures or other assets on the plot?	<input type="checkbox"/> YES <input type="checkbox"/> NO If YES, which:
Type of structure/asset	<input type="checkbox"/> House <input type="checkbox"/> Auxiliary building <input type="checkbox"/> Fence <input type="checkbox"/> Well <input type="checkbox"/> Crops <input type="checkbox"/> Trees <input type="checkbox"/> Installations <input type="checkbox"/> Other: _____
Statuses of structure	<input type="checkbox"/> Legalized (with permit) <input type="checkbox"/> Not legalized (without permit)

2. USE OF THE PLOT

Question	Answer
4. Is the plot used for agricultural purposes?	<input type="checkbox"/> YES <input type="checkbox"/> NO
If YES, which crops/plantations:	
Purpose of production	<input type="checkbox"/> own consumption <input type="checkbox"/> Sale/extra income
Registered agricultural producer	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Is the plot used for residential, business, or other purposes?	<input type="checkbox"/> YES <input type="checkbox"/> NO If YES, which:
6. Is the plot used by anyone else?	<input type="checkbox"/> YES <input type="checkbox"/> NO If YES, who and for what purpose:

3. HOUSEHOLD DATA

Question	Answer
7. Number of household members	Adults: _____ Children: _____
8. Are there vulnerable groups in the household?	<input type="checkbox"/> YES <input type="checkbox"/> NO If YES: <input type="checkbox"/> Children <input type="checkbox"/> Elderly <input type="checkbox"/> People with disabilities <input type="checkbox"/> Single parent household

	<input type="checkbox"/> Socially vulnerable <input type="checkbox"/> Ethnic minority <input type="checkbox"/> Other: _____
9. Main source of household income	<input type="checkbox"/> Employment <input type="checkbox"/> Agriculture <input type="checkbox"/> Pension <input type="checkbox"/> Social assistance <input type="checkbox"/> Other: _____
10. Total monthly household income	<input type="checkbox"/> < 500 BAM <input type="checkbox"/> 500–1,000 BAM <input type="checkbox"/> 1,000–1,500 BAM <input type="checkbox"/> > 1,500 BAM

4. BUSINESS ENTITY DATA *(to be completed only if there is a business activity)*

Question	Answer
11. Name of business entity	
12. Type of activity	
13. Year established	
14. Number of employees	Permanent: Temporary:
15. Average annual income (last 3 years)	BAM
16. Main expected problems due to the Project:	<input type="checkbox"/> Loss of customers <input type="checkbox"/> Business interruption <input type="checkbox"/> damage of equipment <input type="checkbox"/> Other:
17. Preferred form of compensation:	<input type="checkbox"/> Cash <input type="checkbox"/> Replacement land/premises <input type="checkbox"/> Other:

5. IMPACT OF EXPROPRIATION

Question	Answer
18. Will expropriation affect household/business income?	<input type="checkbox"/> NO <input type="checkbox"/> YES, positively <input type="checkbox"/> YES, negatively
Explanation	
19. Most fair type of compensation in your opinion	<input type="checkbox"/> Cash compensation <input type="checkbox"/> Replacement land <input type="checkbox"/> Replacement structure <input type="checkbox"/> Combination <input type="checkbox"/> Other:

6. ADDITIONAL COMMENTS BY RESPONDENT

ANNEX E: Sample Grievance Form

Grievance Form

Protocol Number	
Name and Last name (optional)	
Contact Info We urge you to check the box in which way you want to be contacted	<input type="checkbox"/> By post (Address): <hr/> <input type="checkbox"/> By phone: <hr/> <input type="checkbox"/> By e-mail: <hr/>
Preferred language	<input type="checkbox"/> Bosnian/Croatian/Serbian <input type="checkbox"/> English
Grievance description	What happened? Where did it happen? Who did it? What was the result?
Date of grievance and the number of times it occurred	
<input type="checkbox"/> One time (date: _____) <input type="checkbox"/> It happened more than once (How many times did it happen? ____) <input type="checkbox"/> Ongoing (It happened recently)	
Preferred outcome?	

Table for the register of grievances

Serial number	Method of the due date of complaint	Project	Date of receipt	Complaint type	Complaint description	Applicant		Date of confirmation of receipt	Description of actions taken	Date of resolution
						Age	Gender			