

May 14, 2026

**MEMORANDUM TO THE EXECUTIVE DIRECTORS AND ALTERNATES
INTERNATIONAL DEVELOPMENT ASSOCIATION**

The Inspection Panel

Notice of Non-Registration on a Request for Inspection

**Western Balkans, Serbia: Sava and Drina Rivers Corridors Integrated Development
Program (P168862)**

Summary

1. In accordance with paragraph 18 of the Resolution of the World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service (the “Resolution”),¹ I hereby inform you that on April 8, 2026, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) related to the Western Balkans: Sava and Drina Rivers Corridors Integrated Development Program (the “Program”).
2. The Request was submitted by two individuals from Serbia. The Requesters asked for their identities not to be disclosed for fear of retaliation for submitting the Request to the Panel. The Requesters allege that they were coerced to remove facilities from their property to make way for project-related works, which has left the property unprotected. The Requesters further allege that they are not properly informed whether or how they will be compensated for their additional structures which will be affected by the Project. A redacted copy of the Request for Inspection is attached as Annex I.
3. The Panel’s initial due diligence concluded that the Request did not meet one of the criteria for registration, as there was insufficient evidence that the concerns raised in the Request have been brought to the attention of Management. I am therefore notifying you that the Panel is not registering this Request.

The Program

4. The Program was approved on August 6, 2020, for IBRD financing of grant of US\$ 302.80 million equivalent for the first phase of the Sava and Drina River Corridors Integrated

¹ The World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service, [Resolution No. IBRD 2025-0001 and Resolution No. IDA 2025-0001](#) (March 7, 2025) (the “Resolution”).

Development Program. The Program involves multiple implementing agencies.² The objective of Phase 1 of the Program is to improve flood protection and enhance transboundary water cooperation in the Sava and Drina Rivers Corridors. The expected closing date of the Program is November 30, 2027.

The Request

5. The Requesters allege they were coerced, through threatening letters and aggressive phone calls, to remove a fence and a summer house from their property to make way for project-related works. The Requesters told the Panel that they have been compensated for the summer house and compensation for land is currently being processed.

6. The Requesters alleged that there is a lack clarity on whether or how they will be compensated for additional structures at their property that they believe will be affected by the Project, including the removal of an access bridge, adding that they only received verbal assurance that an access road would be built as a replacement, and as a substitute for monetary compensation. They further allege that their properties have remained unprotected after the removal of the fence, with no safety measures put in place by the relevant authorities, leaving young children exposed to stray dogs and a nearby river.

Panel's Observations and Determination

7. In accordance with the Panel's Operating Procedure³ and following its review of information and engagement with the Requesters, the Panel determined that the Request met the following criteria for Registration:

- is not frivolous, absurd, or anonymous,
- at the time of the submission of the Request the loan has not been closed and less than 95% of the loan has been disbursed,
- the subject matter of the Request does not concern issues of procurement, and
- the Panel has not previously made a recommendation on the issue raised.

8. The Panel considers that Management was not made aware of the issues raised in the Request. Therefore, one of the criteria, as set out in paragraph 14 of the Resolution and paragraph 14(d) of the Operating Procedures — requiring that the issues in the Request be brought to the attention of Management — has not been sufficiently satisfied. I therefore notify you that the Panel is not registering this Request.

² Bosnia and Herzegovina Ministry of Communication and Transport, Brcko District, FBiH Ministry of Agriculture, Water Management and Forestry, International Sava River Basin Commission, Montenegro Ministry of Agriculture, Forestry and Water Management, Republic of Serbia Ministry of Agriculture, Forestry and Water Management, Republic of Serbia Ministry of Construction, Transport and Infrastructure, Republika Srpska Ministry of Agriculture, Forestry and Water

³ Inspection Panel Operating Procedures (November 2025).

9. The non-registration does not preclude the possibility of a future Request for Inspection related to this Program.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ibrahim Pam', with a large loop at the top and a horizontal line at the bottom.

Ibrahim Pam

Attachment

Copy to:

Mr. Ajay Banga, President, International Development Association

Ms. Antonella Bassani, Regional Vice President for Europe and Central Asia, ECAVP

Requesters (Confidential)

**Request for Inspection
(Redacted)**

Complaint (Request for Inspection) Form

To: The Chair

The Chair, Inspection Panel

The World Bank Accountability Mechanism, MSN: MC 10-1007, 1818 H St., NW, Washington, DC 20433, USA. Fax: +1(202)-522-0916. Email: ipanel@worldbank.org

(Please answer the questions below as best as you can. Once the form is submitted, we will contact you to collect any additional necessary information.)

Section 1: Complaint

1. What harm do you believe the World Bank-financed project caused or is likely to cause to you or your community? Please describe in as much detail as possible.

We were (me and my family) pressured by the [REDACTED] to remove the fence that surrounded the plot on which the house was built, and we also had to remove the summer house from the plot. We received letters stating that if we do not remove the fence, it will be removed with construction machines at our expense. In other words, we would pay for the removal of the fence with our own money. After removing the fence and summer house, nothing was done for two years to use the river. This is a remark on the arrogant behavior and constant pressures by the authorities from the Novi Pazar Administration. They often called my brother on the phone and screamed at the pressure to remove the summer house. I personally talked to [REDACTED] and asked him to keep the summer house until the river in front of my house is used. The [REDACTED] also attended the conversation. My request, more precisely the request, was not accepted, allegedly because the World Bank, in other words, the contractors, demand that it be removed. They did not listen to our request that the fence and the summer house be on the plot until the work began. Because of this arrogant behavior on the part of the employees of the City Administration of Novi Pazar, my family and I were exposed to great stress. We have a problem with stray dogs entering the land where the house is built. On one occasion, a huge dog was lying on the stairs in front of the front door of the floor where the brother lives with his wife and four children. It could happen that the children were terrified. No one will take care of that. Second, the plot on which the house was built remained open as it is, for the access of animals that threaten the safety of my brother's children and his wife. No one has ever deigned to put up a protective fence, which would protect the children from dogs and from being exposed to the danger of the high level of the river, which flows close to the house. This reckless behavior is unacceptable. Another problem we have is that the bridge that my father built with his own money will probably not be paid for. As things stand now, we will not receive financial compensation from the City Administration for the costs of building the bridge. There is concern that we will not be paid for the costs: for the gate in the yard, the walls with which the yard is fenced, as well as the blocks with which the plot on which the house is built. We also do not know where the new bridge will be built. Please note that this bridge is the only approach to the house. We have a verbal explanation that the reason for the lack of monetary compensation for the bridge is supposedly the road that will be built and which will be compensation for the bridge. That is unacceptable! We do not have clear information whether the road will be asphalted at all. We are asking for the road to be asphalted and for us to be shown a document that proves it. There is a justified suspicion among citizens that only preparatory work for asphalt will be done, and that the road will not be asphalted. We also have objections regarding the width of the road. According to the information that we have, the road will be so wide that it will pass under our window, in other words through the bedroom. There is absolutely no need for such a wide road. That is unacceptable!

2. What is the name of the World Bank project? (If known)

Regulation of the Josanica river

3. Where is the World Bank project located? (Please include country name)

Serbia

4. Do you live in the project area?

Yes, I do.

5. Have your concerns previously been reported to the World Bank? If yes, please provide the details about those communications and explain why you are not satisfied with the Bank's response.

No, I have not been previously reported to the World Bank.

6. If known, please list the World Bank's operational policies procedures you believe have not been followed.

7. Do you expect any form of retaliation or threats for filing this complaint?

Yes, I do. I could expect a threat or retaliation from the [REDACTED]. There could be pressure from the [REDACTED]. If it happens, I hope you will do everything that is in your power to protect me and my family from such unpleasantness.

8. In addition to receiving information about the Compliance investigation process, would you also like to receive information about the option of dispute resolution?

Yes, I would like to receive information about that.

Section 2: Contact Information

9. Are you complainants or a representative of complainants*?

Complainants: I am a Complainants Representing a complainant or community: Other: (Please explain)

10. Would you like your name and contact details to be kept confidential? (We will not disclose your identities to anyone without your prior consent.) Yes **(Yes, I would like that my name and contact details be kept confidential.)** No

11. Complainants' or representatives' names (minimum two names and signatures are required):

	Complainant /Representative 1	Complainant /Representative 2
Name	[REDACTED]	[REDACTED]
Address	[REDACTED]	
Phone		
Email	[REDACTED]	

12. By completing and submitting this form, we authorize the Inspection Panel to investigate the issues as described in this form.

Signature 1	Signature 2
[Redacted]	[Redacted]

Signatures (more signatures can be sent as an attachment):

NOTES:

- **If you are a representative of complainants, we will need a letter from the complainants authorizing you to represent them.*
- *Please attach supporting documents, if available.*
- *If you have any difficulty in completing the form, please contact the World Bank Accountability Mechanism at Email: jpanel@worldbank.org or by phone: +1-202-458-5200.*

Special notes in the complaint

The specific remarks in the complaint refer to: in addition to inadequate and untimely information provided by the administration, the remarks are as follows: if the road goes through, my house will lose value because a part of the plot will be taken, then the way of living will completely change, and the very concept of life will be altered. So my household members will not have the privacy they had, the peace we had will be completely lost, and the current access to the house will be more distant than it is now. Children will lose their play space, or almost won't have any in the yard. I note that since the first public debate I attended, there have been many contradictions. I note that at first it was mentioned in the discussion that only rivers would be used, but later information about roads appeared. The first public discussion I attended has a lot of contradictions. Everything is quite confusing, and there is a lot of manipulation in terms of the availability of information.