

# Independent Reporting Mechanism

Action Plan Review:  
Bosnia and Herzegovina  
2025–2027

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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## Section I. Overview

**Bosnia and Herzegovina (BiH)'s third action plan includes promising commitments to simplify registration procedures for non-governmental organizations, develop an open data portal, and regularly publish public procurement contracts. Most commitments carry forward unfinished or partially finished reforms from the previous cycles. The complexity of public administration reform and overlapping governance processes may present challenges for implementation.**

BiH's third action plan (2025-2027) has 10 commitments, seven of which directly continue initiatives in the first two plans.<sup>1</sup> The IRM has identified three commitments as the most promising. Commitment 3 is a new initiative and aims to simplify the registration procedure for associations, foundations, and non-governmental organizations (NGOs). This commitment could reduce the occurrence of negative decisions on applicants' requests and enable greater transparency and efficiency in the registration procedure. Commitments 4 and 6 could lead to significant improvements in the transparency and accessibility of public information. Commitment 4 aims to support the development of the pilot of BiH's first national open data portal, an unfulfilled commitment from the previous action plan. Commitment 6 aims to publish all public procurement contracts in BiH to the platform launched during the previous cycle.

Most of the other commitments would either continue practices from the previous action plans or offer modest changes to these practices and policies. This is the case for commitments aimed at raising civil society awareness of beneficial ownership (Commitment 1), improving proactive transparency practices in public institutions (Commitment 5), facilitating public access to statistical data (Commitment 7), and improving budget allocation transparency (Commitment 8). A new initiative involves assessing the vulnerability of the NGO sector to money laundering and terrorist financing (Commitment 2) but lacks a clear open government lens of advancing either transparency, participation, or accountability.

During the co-creation process, two meetings of the Advisory Council (BiH's multi-stakeholder forum for OGP) and a series of interdepartmental consultative meetings were held.<sup>2</sup> In addition, from 19 February to 6 March 2025, consultations were carried out via the e-consultation platform<sup>3</sup> but received no responses.<sup>4</sup> The Ministry of Justice of BiH invited all institutions to

### At a Glance

#### MEMBERSHIP

**2014**      **Joined OGP**

#### COMMITMENTS

**9/10**      **Open government lens**

**1/10**      **Substantial potential for results**

#### PROMISING COMMITMENTS

- Commitment 3: Simplification of the registration procedure for associations and foundations through computer software
- Commitment 4: Coordination of the open data ecosystem development
- Commitment 6: Transparent public procurement contracts

**Met the minimum requirements during co-creation: No**

participate in discussions for the action plan, but the number of institutions involved remained the same as in the previous cycle.<sup>5</sup> On 7 March 2025, the Ministry of Justice of BiH prepared a Consultation Report and sent it to the Council of Ministers of BiH for consideration, along with the action plan.<sup>6</sup> The Council of Ministers of BiH adopted the action plan on 8 July 2025.

At the time of the action plan's adoption, the Government of BiH had not passed the state budget for the fiscal year 2025. Until the state budget was finally passed in November 2025,<sup>7</sup> the state government of BiH operated largely on a temporary funding basis, meaning that institutions received limited monthly amounts based on the previous year's model, preventing normal planning and investment at the state level. In addition, the Government of BiH expects there to be a similar delay in passing the budget for 2026, causing the same temporary funding situation. This means some commitments requiring large financial investments, such as the NGO registration simplification (Commitment 3) and initiatives from the Agency for the Prevention of Corruption and Coordination of the Fight against Corruption of BiH (Commitments 9 and 10), may not be implemented within the planned deadlines.<sup>8</sup> BiH's OGP implementation is heavily dependent on external project financing, creating structural vulnerabilities. A civil servant noted that the completion of projects that co-financed commitments from the previous action plan, such the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) project that supported the Public Administration Reform Coordinator's Office (PARCO), could undermine the implementation of commitments in the current plan.<sup>9</sup> Nevertheless, civil society members of the Advisory Council remain committed to the OGP process, despite political complexities affecting previous action plans.<sup>10</sup> A civil society representative believes that the measures in the third action plan are ambitious but also noted that it is crucial to link the measures of the OGP action plans and other strategic documents in order to improve implementation.<sup>11</sup>

The European Commission's 2024 Progress Report on BiH states that the country's European Union (EU) integration has been "relatively slow", partly due to internal political instability and the lack of progress on electoral and constitutional reforms.<sup>12</sup> The European Commission approved BiH's Reform Agenda in December 2025, unlocking around 975 million EUR in financing for BiH under the EU's Reform and Growth Facility for the Western Balkans.<sup>13</sup> While this support is much needed for BiH, it is conditional on implementation of the Reform Agenda.

In 2024, Modriča (in Republika Srpska) and Travnik became the first municipalities in BiH to join the OGP Local program.<sup>14</sup> In 2025, the Brčko District Assembly expressed its desire to work with TI BiH and join OGP, either through an Open Parliament initiative or by joining OGP Local. The Advisory Council plans to host members of the Brčko District Assembly to offer them good practices and possibly enable the establishment of an open government multi-stakeholder forum (like the Advisory Council) in the Brčko District Assembly, consisting of MPs and civil society representatives. Given the highly decentralized government structure in BiH, the national OGP process could be strengthened by finding closer synergies with BiH's OGP Local members or by encouraging greater expansion of OGP Local. Government members of the Advisory Council also indicate that they would like the OGP Support Unit to engage more proactively in BiH by supporting the activities implemented by Advisory Council members.<sup>15</sup>

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<sup>1</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027, <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-action-plan-2025-2027/>. Implementation of the action plan will last until 31 August 2027, which is also specified as the deadline for the implementation of activities, except for those activities that will be implemented on a continuous basis.

<sup>2</sup> Ministry of Justice, Minutes from regular meetings of the Advisory Council of the Open Government Partnership initiative, <https://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA>

<sup>3</sup> The e-consultation platform, [www.ekonsultacije.gov.ba](http://www.ekonsultacije.gov.ba)

<sup>4</sup> Report on e-consultations held with the interested public. Topic: Preliminary draft of the Action Plan of the Council of Ministers for the implementation of the Open Government Partnership initiative 2025-2027.

<sup>5</sup> Selma Džihanović-Gratz, interview by the IRM.

<sup>6</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027, <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-action-plan-2025-2027/>

<sup>7</sup> Sarajevo Times, BiH gets a budget for the current year in November, amounting to 1.5 billion BAM, <https://sarajevotimes.com/bih-gets-a-budget-for-the-current-year-in-november-amounting-to-1-5-billion-bam/>

<sup>8</sup> Mubera Begić, Vedrana Faladžić (PARCO), interview by the IRM, 2 December 2025.

<sup>9</sup> Ibid.

<sup>10</sup> Lejla Bičakčić (Center for Investigative Reporting - CIN), interview by the IRM, 27 November 2025; Emsad Dizdarević, (Transparency international BiH), interview by the IRM, 26 November 2025.

<sup>11</sup> Lejla Bičakčić, Minutes from 12th meetings of the Advisory Council of the Open Government Partnership initiative from 20 January 2025, <https://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA>

<sup>12</sup> European Commission, Bosnia and Herzegovina 2024 Report, accessed 15 November 2025, [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024_en)

<sup>13</sup> European Commission, Commission approves Bosnia and Herzegovina's reform agenda, [https://enlargement.ec.europa.eu/news/commission-approves-bosnia-and-herzegovinas-reform-agenda-2025-12-04\\_en](https://enlargement.ec.europa.eu/news/commission-approves-bosnia-and-herzegovinas-reform-agenda-2025-12-04_en)

<sup>14</sup> PARCO, Travnik and Modrica joined the Open Government Partnership, 17 April 2024, [https://parco.gov.ba/hr/2024/04/17/travnik-i-modrica-prikljucili-se-partnerstvu-za-otvorenu-vlast/?utm\\_source=chatgpt.com](https://parco.gov.ba/hr/2024/04/17/travnik-i-modrica-prikljucili-se-partnerstvu-za-otvorenu-vlast/?utm_source=chatgpt.com)

<sup>15</sup> Dizdarević, interview by the IRM; Begić, interview by the IRM; Faladžić, interview by the IRM.

## Section II. Promising Commitments

This section analyzes commitments with the most promise to achieve notable results, according to IRM assessment. Promising commitments address a policy area important to stakeholders or the national context. They must be verifiable, have an open government lens, and a modest or substantial potential for results. This review looks at challenges, opportunities, and recommendations to support implementation.

**Table 1. Promising Commitments**

<b>Commitment 3</b> aims to develop software to assist with NGO registration and potential amendments to the acts.
<b>Commitment 4</b> aims to support the creation of a central open data portal and its operability, as well as the active role of institutions in publishing data.
<b>Commitment 6</b> aims to make all data on concluded public procurement contracts publicly available via the public procurement portal <a href="http://www.ejn.gov.ba">www.ejn.gov.ba</a> .

### **Commitment 3: Simplification of the registration procedure for associations and foundations (non-governmental organizations) through computer software that automatically generates the required registration documents**

Implementers: Ministry of Justice of Bosnia and Herzegovina, Regional School of Public Administration (ReSPA)

For a complete description, see Commitment 3 of the Bosnia and Herzegovina Action Plan 2025-2027

#### **Context and Objectives:**

Reliable public data on the number of associations, NGOs, and foundations registered at the state level in BiH are not available, but media estimates place the figure at around 25,000.<sup>1</sup> The Law on Associations and Foundations of BiH regulates the procedure for registration of NGOs and trade unions at the state level, as well as registration of changes and deletion of associations, foundations, and offices/representative offices of foreign NGOs.<sup>2</sup> The “Rulebook on the manner of maintaining the Register of Associations and Foundations of BiH and foreign and international associations and foundations and other non-profit organizations” defines the contents of the registry and documentation for non-profit organizations.<sup>3</sup> The procedure is designed to prevent money laundering and terrorist financing, and to increase transparency of the work of NGOs.<sup>4</sup> However, it is often a bureaucratic<sup>5</sup>, demanding, lengthy, and expensive process.<sup>6</sup> Applicants must submit numerous documents and forms to the Ministry of Justice of BiH during registration. The most demanding part of the registration process is the preparation of documents prescribed by law (founding act, statute, decisions on the appointment of NGO bodies, statements, and other documents).<sup>7</sup>

Inter-institutional communication was frequently conducted by phone or post, while amendments and legal changes were likewise exchanged by mail, resulting in lengthy procedural delays.<sup>8</sup> The process often involves additional costs related to hiring lawyers or professionals, and drafting and submitting all necessary documents to the Ministry of Justice of BiH for the legal registration of the appropriate form of NGO.<sup>9</sup> Communication is often delayed due to reliance on conventional postal correspondence rather than electronic communication.

NGOs contend that it is difficult to know who to follow up with on the progress of their case when they submit a request.<sup>10</sup> Legislative procedures are often complex and most of the procedural burden is placed on the applicants—citizens and legal entities.

Under this commitment, the Ministry of Justice of BiH will develop a software solution on its official website to facilitate the registration of NGOs. The software will be supported by the eGovernment of the Council of Ministers of BiH.<sup>11</sup> The Ministry of Justice of BiH will establish a free computer program on its website allowing applicants to choose the appropriate package, depending on the type of organization they want to register.<sup>12</sup> Digital templates will be available on the website to simplify the process of registration and updating changes to registration data for associations and foundations. Transparency International BiH (TI BIH) proposed this commitment in the Advisory Council during the action plan co-creation process.<sup>13</sup> The software will be supported through the Regional School of Public Administration (ReSPA),<sup>14</sup> funded by the European Commission.<sup>15</sup> The old approach significantly extends the processing time, particularly when delivery attempts occur in the absence of the recipient, resulting in returned mail and repeated delivery procedures.<sup>16</sup>

### **Potential for results: Modest**

This measure would be an important step in reducing the burden of drafting the documents necessary for NGO registration.<sup>17</sup> The new software would generate the legislative documents on its own, based on the data and information entered by applicants on the one hand, as well as imperative legal norms on the other.<sup>18</sup> The introduction of standardized online forms would streamline and simplify procedures<sup>19</sup>, and improve clarity for the non-governmental sector on documentation requirements.<sup>20</sup> However, the potential benefits to the mechanism itself are mainly a procedural improvement and not a structural change. Thus, the IRM assesses the commitment as having modest potential for results.

This commitment is a priority of the NGO sector to increase their understanding of what they need to write and how to compile that documentation.<sup>21</sup> By making standardized templates available online, the commitment would make the procedures of registration and re-registration more transparent and accessible for associations. It could also simplify administrative processes and advance the digitalization of public administration in accordance with the Strategic Framework for Public Administration Reform.<sup>22</sup>

The commitment could also encourage more organizations to register at the BiH level.<sup>23</sup> In recent years, several legal developments in the Republika Srpska have been identified as narrowing the space for the operation of CSOs. One of the most frequently cited was the 2025 Law on the Special Register and Publicity of the Work of Non-Profit Organizations, which establishes a separate register for organizations receiving foreign funding and introduces additional reporting and oversight requirements. Critics argued that such measures stigmatize organizations and restrict their activities, particularly in areas related to public advocacy.<sup>24</sup> The law was suspended in March 2025 and annulled by the Constitutional Court in May 2025, and formally repealed by the RS Assembly in October 2025.<sup>25</sup> In addition, amendments to the Criminal Code of Republika Srpska in 2023 that reintroduced criminal liability for defamation have raised concerns about potential pressures on civil society, journalists, and activists.<sup>26</sup> Certain provisions of the Law on Public Order and Peace have also been criticized for potentially

limiting freedom of expression in public and online spaces.<sup>27</sup> These developments have forced many organizations from the Republika Srpska to register at the BiH level from 2024.

### **Opportunities, challenges, and recommendations during implementation:**

BiH does not have a single, fully operational system of qualified electronic signature at the state level in accordance with the EU's eIDAS standards. This could pose a challenge for the full automation of administrative processes, including this commitment.<sup>28</sup> Citizens and NGOs may still have to print, sign, and physically deliver some documentation. Moreover, the electronic tax payment system can be a challenge to navigate for organizations that do not yet have payment cards for legal entities and prefer to use private bank cards for these purposes.<sup>29</sup>

For implementation, the IRM recommends the Ministry of Justice of BiH and other implementing entities consider the following steps:

- To avoid misunderstandings and delays, make all templates easily accessible in a single place, ensuring clarity and uniformity. Standardizing all required forms and documents would reduce errors, prevent inconsistent submissions, and increase transparency if all documents are available in the three official languages of BiH.
- Partner with one or more associations of NGOs with legal expertise so that they are kept informed about the developments and can advise and support NGOs most effectively.
- Maintain flexibility in paying fees on the system for a certain period by enabling organizations to pay at the bank and upload invoices until organizations introduce a card payment system.
- Offer ongoing support and guidance for applicants. The ministry could establish a helpdesk (online and/or phone) and short instructional videos or FAQs to help applicants understand documentation requirements and correct completion of forms.
- Simplify administrative procedures by targeted regulatory amendments. This could be done by reducing the number of documents or approvals needed, aligning regulations with digital or online procedures, and eliminating overlapping responsibilities between institutions.
- Review and streamline existing legal and procedural requirements to eliminate unnecessary steps and reduce the burden placed on citizens and NGOs.
- Actively raise public awareness of the new digital tools to maximize their adoption and impact. Conduct an outreach campaign so NGOs, citizens, and legal entities know about the platform, understand how to use it, and trust the new system.
- Ensure long-term sustainability of the software solution. Public institutions could secure funding and continuous maintenance, updates, cybersecurity, and user feedback loops to ensure the system remains functional, secure, and responsive to user needs.

### **Commitment 4: Coordination of the open data ecosystem development (public data good)**

#### **Implementers: Public Administration Reform Coordinator's Office (PARCO)**

For a complete description, see Commitment 4 of the Bosnia and Herzegovina Action Plan 2025-2027

#### **Context and Objectives:**

BiH ranked 124<sup>th</sup> out of 198 countries in the 2024 Open Data Inventory ranking.<sup>30</sup> The country's public data ecosystem lacks comprehensiveness, accessibility, and standardization, hampering

transparency, data-driven policy-making, research, and oversight.<sup>31</sup> BiH does not have a centralized open data portal covering the entire public sector. According to the action plan, major inhibiting factors include the lack of high-level prioritization of open data, lack of awareness of the benefits of open data, lack of IT staff, and lack of systematic database record-keeping and basic information management practices in institutions.<sup>32</sup>

In the second action plan (2022-2024), the Public Administration Reform Coordinator's Office (PARCO) committed to develop and pilot BiH's first central open data portal. However, the Service for Maintenance and Development of Electronic Business and e-Government in the General Secretariat of the Council of Ministers of BiH could not reach an agreement on the technical and financial maintenance of the portal.<sup>33</sup> PARCO has carried this commitment into the third action plan. PARCO's role in the third action plan is to establish cooperation with key BiH institutions to define and agree on an institutional framework for the functioning of the portal.<sup>34</sup>

Under this commitment, PARCO will submit a decision to the Council of Ministers outlining how the portal will be sustained in line with the Law on Free Access to Information 2023.<sup>35</sup> According to the Law on Freedom and Access to Information, the General Secretariat of the Council of Ministers of BiH is responsible for establishing a Central Portal of Public Information for its permanent availability (Article 15 of the Law).<sup>36</sup> PARCO has clarified that the open data portal created for this commitment will be used as the basis for the portal operated by the General Secretariat within the framework of a Council of Ministers website project supported by UNDP.<sup>37</sup> This will ensure that all work completed by PARCO is integrated into the General Secretariat's portal and adheres to the Law on Free Access to Information.<sup>38</sup> In addition, the promotion and advocacy activities at other government levels for opening data sets are aligned with the Strategic Framework for Public Administration Reform and action plan 2018-2022.<sup>39</sup>

### **Potential for results: Modest**

Institutions publish information in accordance with the Instructions on the Development and Maintenance of Official Websites of Institutions of BiH and in accordance with the Law on Freedom and Access to Information.<sup>40</sup> However, data publication in BiH remains fragmented, dependent on individual institutions. This commitment would pilot and promote a central open data portal in public institutions. In addition to supporting transparency and data reuse, a centralized portal could contribute to BiH's alignment with the EU *acquis*, particularly in public sector information and digital governance.<sup>41</sup> The EU Open Data and Re-use of Public Sector Information Directive (Directive (EU) 2019/1024) sets clear expectations regarding proactive publication, machine-readable formats, and the reuse of public data.<sup>42</sup> While BiH is not yet required to fully comply with this directive, progress toward a state-level open data portal is an important preparatory step toward future alignment with these standards.

The academic community stands to gain from streamlined access to accurate and verifiable information. Such access enhances the quality of research conducted and enables more effective monitoring of societal, educational, and economic trends, while also facilitating the development of evidence-based solutions to various challenges.<sup>43</sup> A persistent challenge in journalistic work is the lack of publicly available information, as institutions often refuse access. Proactive publication of such data would enhance the quality of reporting, enabling citizens to make better-informed decisions.<sup>44</sup> From a media perspective, the portal would enable systematic access to information that is crucial for institutional accountability and uncovering systemic problems in the public sector.<sup>45</sup> Instead of individual requests for access to

information, open data enables continuous monitoring of the system, which significantly speeds up and improves investigative journalism and allows journalists to identify potential conflicts of interest, recurring suppliers, concentration of public money with certain companies, or non-transparent engagements through service contracts.<sup>46</sup> Such analyses often reveal systemic patterns of clientelism, political recruitment, or inefficient spending of public funds, which are topics of great public interest and a frequent focus of investigative stories. However, it is not known when this decision will be implemented. Moreover, the commitment does not specify the number of institutions that will be part of the promotion of the portal. If the system is not well planned, technically well developed, and if the data is not regularly updated and available in usable formats, there is a risk that it will not meet expectations.<sup>47</sup> Therefore, the IRM assesses this commitment as having modest potential for results.

### **Opportunities, challenges, and recommendations during implementation:**

According to PARCO, the greatest potential challenges for this commitment could be a lack of proactive civil society engagement in developing measures, information sharing, and undertaking joint activities, including training and advocacy.<sup>48</sup> The Council of Ministers, in the same session where they adopted the action plan, also adopted the civil society development strategy which covers CSO-government cooperation for 2025-2029, which creates a framework for deeper engagement. This strategy could be relevant for the implementation of this commitment, and more generally in the context of enabling civic space in BiH.<sup>49</sup>

For implementation, the IRM recommends PARCO consider the following steps:

- As political disagreement over the implementation of this commitment has persisted over two action plans, it will be important to ensure strong political endorsement for the open data agenda as a cross-government reform. The Council of Ministers could make a formal decision to assign responsibility and hosting arrangements. This could help to ensure seamless integration of PARCO's open data portal into the General Secretariat platform to avoid duplication, fragmentation, and sustainability risks.
- Include civil society in the process of identifying the pilot institutions for the portal, in addition to the selection of data with the highest potential for usefulness and reusability.
- Provide specialized training for civil servants on data management, principles of open data and principles of the Personal Data Protection Law 2025 and Law on Free Access to Information 2023.
- Implement public awareness campaigns targeting civil society, academia, media, private sector, and citizens to increase understanding of open data benefits.
- Proactively engage civil society members of the Advisory Council as well as the staff of public institutions in designing the portal. This could entail proposing joint activities, such as participation in trainings, policy consultations, and awareness-raising initiatives.

### **Commitment 6: Transparent public procurement contracts**

Implementer: Public Procurement Agency of BiH

For a complete description, see Commitment 6 of the Bosnia and Herzegovina Action Plan 2025-2027

### **Context and objectives:**

Under this commitment, the Public Procurement Agency of BiH aims to regularly publish all public procurement contracts through the public procurement portal ([www.ejn.gov.ba](http://www.ejn.gov.ba)), established during the second action plan. The commitment envisages establishing a legal framework, creating a module for publishing public procurement contracts on the public procurement portal and enabling the publication of a search for published public procurement contracts, according to the parameters of the public procurement procedure for which the public procurement contract was concluded, as well as according to the content of the published public procurement contract.

According to the 2024 European Commission progress report on BiH, procurement remains vulnerable to corruption and the country needs to develop the e-procurement system to ensure transparency.<sup>50</sup> Under the Public Procurement Law of 2024, the key provisions of each contract must be published on the public procurement portal,<sup>51</sup> but the publication of the full contract is not envisaged. Introducing this measure would require further alignment with EU directives, the creation of a new legal framework, and an overall increase in transparency and accountability in the management of public funds in BiH.<sup>52</sup> In line with the Public Procurement System Development Strategy of BiH 2024–2028, the draft of the new Public Procurement Law and its explanatory notes are undergoing public consultations before adoption. The draft law introduces the requirement to publish complete contracts, forming the basis for developing a module for publicly disclosing the register of public procurement contracts.<sup>53</sup>

### **Potential for results: Substantial**

This commitment would make public procurement data available in open format and in a single searchable portal for the first time in BiH.<sup>54</sup> Access to data on the spending of public funds could significantly strengthen the integrity and accountability of public sector organizations.<sup>55</sup> Publishing public procurement contracts increases transparency, makes oversight easier, and helps reduce corruption.<sup>56</sup> This measure would allow users to search for published public procurement contracts, according to the parameters of the public procurement procedure for which the public procurement contract was concluded and according to the content of the published public procurement contract.<sup>57</sup> This measure will increase transparency and improve the accountability of public funds management in BiH.<sup>58</sup> According to a PARCO representative, publishing public procurement contracts will provide deeper insight into the implementation of public procurement procedures and the monitoring of contract implementation. This would simplify the work of competent authorities such as financial audit offices, prosecutors' offices and other law enforcement agencies, if necessary, and NGOs, thus reducing the impact of corruption in this area.

A coordinated legislative framework that legally obliges institutions to publish data (e.g. through amendments to secondary legislation or alignment with access to information rights and digital standards) will move from the current "publish when you want" to a systemic legal and normative obligation to publicly publish data in an interoperable format, thereby strengthening the legal basis for transparency.<sup>59</sup> According to civil society representatives, publishing contracts is not only important for civil society that follows this topic, but also for companies and third parties, which can then draw information from this data, or, by processing it, create new products like academic research and investigative articles.<sup>60</sup> One civil society representative noted that whenever processes are transparent and institutions know the public can observe them, irregularities are more likely to be corrected.<sup>61</sup>

### **Opportunities, challenges, and recommendations during implementation:**

In February 2025, BiH adopted the Personal Data Protection Act,<sup>62</sup> which extends protection beyond traditional personal information to digital identifiers (such as IP addresses, e-mail addresses, and online identifiers), as well as biometric and other modern categories of data. In publishing public procurement contracts, challenges may arise related to compliance with personal data protection legislation.<sup>63</sup> Additional harmonization will be required, along with addressing other legal issues associated with publishing contract information.<sup>64</sup> Another potential challenge is a lack of political support for certain contracts being approved or published to the portal.<sup>65</sup>

The portal will primarily be of interest to citizens and non-governmental organizations, who will be able to review contracts in a simple way.<sup>66</sup> It will be important that information about the portal is communicated to the public and media to reach as many citizens as possible.<sup>67</sup>

During implementation, the IRM recommends the Public Procurement Agency of BiH consider the following steps:

- Consider creating a legal obligation to publish all procurement contracts and amendments or budget changes within or beyond the initial contract terms without delay, limiting exemptions strictly to cases supported by clear, transparent, and lawful justification.
- Launch a nationwide communication campaign to inform citizens, journalists, companies, and researchers about the new portal. Use media partnerships, social networks, infographics, and clear guides on how to use the platform.
- Establish oversight committees bringing together civil society, the private sector, and independent institutions to monitor use of the portal.
- If possible, introduce an automated system ensuring that contracts and amendments or budget changes within or beyond the initial contract terms, cannot be finalized without the necessary documentation, accompanied by a requirement for contracting authorities to publicly justify any delays in publication.

### **Other commitments**

Other commitments that the IRM did not identify as promising commitments are discussed below.

Under **Commitment 1**, the Ministry of Justice of BiH aims to raise awareness among CSOs about the importance of beneficial ownership transparency. It continues a commitment from the 2022-2024 action plan, where the Ministry of Justice of BiH held four workshops, engaging over 70 CSOs.<sup>68</sup> Similarly, the new commitment calls for holding four workshops. While raising awareness among CSOs has value, it is a small step toward transparency of beneficial ownership in BiH. As with the previous commitment, the IRM assesses the current commitment as having unclear potential results. Going forward, the Ministry of Justice of BiH could take steps to establish a beneficial ownership register in BiH.

Under **Commitment 2**, the Ministry of Justice of BiH aims to assess the vulnerability of NGOs to money laundering and terrorist financing abuses. The ministry will also cooperate with relevant institutions and the NGO sector to raise awareness and strengthen their capacities for preventing such occurrences. This commitment is aligned with the recommendations of the Financial Action Task Force (Recommendation 8 and Recommendation 1) and the latest EU package of regulations on combating money laundering and terrorist financing. While

identifying risks could support the sustainability of the NGO sector, the commitment would not increase transparency in the work of NGOs. It also does not guarantee that the institutional framework of BiH for combating money laundering and terrorist financing will be strengthened. Therefore, the IRM assesses it as having unclear potential for results.

Under **Commitment 5**, PARCO aims to strengthen proactive transparency among public institutions. PARCO plans to update the Policy and Standards (to be adopted by the Council of Ministers of BiH), promote proactive publication among civil servants and institutional leadership, and build staff capacity. The commitment also involves measuring user satisfaction, monitoring progress, and piloting the standards in at least two municipalities—one in the Federation of BiH and one in Republika Srpska. This commitment continues initiatives from the first (2019-2021)<sup>69</sup> and second (2022-2024)<sup>70</sup> action plans. Since 2018, government institutions of BiH are required to proactively publish 38 categories of information, including annual budgets, public procurement documents, and work plan.<sup>71</sup> However, many institutions do not publish basic information. While the new commitment might go further than the previous ones by adopting new or amended proactive transparency standards, this long-term pattern suggests that institutional behavior and priorities have not changed. As there are no administrative consequences for non-compliance, institutions have little incentive to prioritize proactive transparency. Additionally, it is unclear if the new or amended transparency standards will go further than the existing requirements from 2018. As with the previous commitments related to this area, the IRM assesses this commitment as having unclear potential results.

Under **Commitment 7**, the Agency for Statistics of BiH aims to facilitate public access to statistical information. The commitment calls for implementing a system for regular retrieval of administrative data from key registers (including signing agreements with the institutions that own the data), raising awareness of the importance of using administrative data for statistical purposes, and continued implementation of online databases for creating and downloading customized statistical tables. It continues commitments from the first and second action plans, the latter not completed by the end of the action plan (December 2024).<sup>72</sup> By making statistical databases more accessible and adaptable, the measure enhances transparency, strengthens public trust, and improves opportunities for research and analysis. As with the previous commitment, the current initiative has modest potential for results, but this will depend on cooperation and data quality outside the control of the Agency. The commitment does not offer enforcement mechanisms and does not directly address structural problems in administrative data management.

Under **Commitment 8**, the Ministry of Finance and Treasury of BiH aims to publish updated, easy-to-understand, and accessible budget data. It builds on earlier commitments from the Ministry of Finance and Treasury of BiH to encourage institutions to produce citizens' budgets.<sup>73</sup> For the new commitment, the ministry will publish detailed quarterly reports on the expenditure of budget funds, including information on any deviations from planned amounts and the reasons for such deviations. The ministry will also involve new budget beneficiaries in the preparation and publication of the Budget for Citizens and provide guidance to BiH institutions on publishing documents in accordance with the Law on Freedom of Access to Information. The Ministry of Finance and Treasury of BiH can recommend or instruct budget beneficiaries to publish data in open formats, but it cannot sanction non-compliance. Therefore, many institutions still fail to publish basic financial and operational information, and some may resist publishing sensitive financial details, leading to partial or selective implementation. However,

depending on the uptake by institutions, the quarterly reports could shed light on how public funds are being spent. Therefore, the IRM assesses this commitment as having modest potential for results.

Under **Commitment 9**, the Agency for the Prevention of Corruption and Coordination of the Fight against Corruption of BiH (APIK) aims to establish a register of budgetary allocations from the budget of BiH institutions. This builds on a commitment from the second action plan where APIK and TI BiH established voluntary criteria for state institutions on publishing information on the amount and purpose of public funds allocated to media and CSOs.<sup>74</sup> The commitment has unclear potential for results because its implementation depends on multiple institutions with mixed levels of cooperation to provide regular, complete, and accurate budget allocation data. This could prove challenging in BiH's highly fragmented institutional landscape. APIK cannot compel institutions to submit data or sanction non-compliance. The IRM recommends the APIK clarify how it will implement the register and the scope and functionality of the register. Considering the previous commitment, APIK could consider working with the Council of Ministers to mandate institutional participation rather than relying on voluntary cooperation.

Under **Commitment 10**, APIK aims to develop a comprehensive communication strategy of the Agency and establish a specialized team in APIK and anti-corruption bodies in BiH, tasked with public relations and media promotion. This is a new commitment. However, in the second action plan APIK created the new website that consolidated anti-corruption information at all levels of government. While a communication strategy could improve the transparency and visibility of APIK's work, it is unlikely to address core anti-corruption problems in BiH. Therefore, the IRM assesses this commitment as having unclear potential for results.

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<sup>1</sup> Večernji.ba, According to the State Register, there are 25,000 NGOs in BiH, 15,000 have submitted reports, see: [https://www.vecernji.ba/vijesti/po-drzavnom-registru-u-bih-ima-25-000-nvo-izvjesce-predalo-15-000-1275965?utm\\_source=chatgpt.com](https://www.vecernji.ba/vijesti/po-drzavnom-registru-u-bih-ima-25-000-nvo-izvjesce-predalo-15-000-1275965?utm_source=chatgpt.com)

<sup>2</sup> Official Gazette of Bosnia and Herzegovina, No. 32/01, 42/03, 63/08.

<sup>3</sup> Rules on the manner of maintaining the register of Associations and Foundations of Bosnia and Herzegovina and foreign international associations and foundations and other nonprofit organizations, see: <https://euresurs.ba/wp-content/uploads/2024/08/Pravilnik-o-nacinu-vodjenja-registra-udruzenja-i-fondacija-BiH-i-stranijh-mediju-narodnih-udruzenja-i-fondacija-i-drugih-neprofitnih-organizacija.pdf>.

<sup>4</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.

<sup>5</sup> Nermin Mahmutović (editor in chief of portal Fokus.ba), correspondence with the IRM, 16 March 2026.

<sup>6</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027; Selma Džihanović-Gratz (Ministry of Justice of Bosnia and Herzegovina), interview by the IRM, 18 November 2025.

<sup>7</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.

<sup>8</sup> Lejla Bičakčić (Center for Investigative Reporting - CIN), interview by the IRM, 27 November 2025; Dizdarević, interview by the IRM.

<sup>9</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.

<sup>10</sup> Selma Džihanović-Gratz (Ministry of Justice of Bosnia and Herzegovina), interview by the IRM, 18 November 2025.

<sup>11</sup> Minutes from the 11th session of the Advisory council of the Initiative "Open Government Partnership".

<sup>12</sup> Nedžad Salman (Ministry of Justice of Bosnia and Herzegovina). Minutes from the 12th session of the Advisory Council of the OGP Initiative from 20 January 2025.

<sup>13</sup> Emsad Dizdarević (Transparency international BIH), Minutes from 12th meetings of the Advisory Council of the Open Government Partnership initiative from 20 January 2025, <https://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA>

<sup>14</sup> Regional School of Public Administration, Handjiska-Trendafilova: Continued support of the European Commission is a strong endorsement of ReSPA's mission and future direction, <https://www.respaweb.eu>

<sup>15</sup> Džihanović-Gratz, interview by the IRM.

<sup>16</sup> Stefan Blagić (RESTART Srpska), correspondence with the IRM, 16 March 2026.

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- <sup>17</sup> Emsad Dizdarević (Transparency International BiH), interview by the IRM, 26 November 2025.
- <sup>18</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.
- <sup>19</sup> Mladen Bubonjić (PhD Doctor of Philosophy, Independent University of Banja Luka), correspondence with the IRM, 16 March 2026.
- <sup>20</sup> Džihanović-Gratz, interview by the IRM. Dizdarević, interview by the IRM.
- <sup>21</sup> Alen Vejzagić (CPI Foundation), interview by the IRM, 2 December 2025.
- <sup>22</sup> Official Strategic Framework for Public Administration Reform 2018-2022 (abbreviated SFPAR) of Bosnia and Herzegovina.
- <sup>23</sup> Vejzagić, interview by the IRM. Dizdarević, interview by the IRM.
- <sup>24</sup> OSCE, <https://odhr.osce.org/odhr/586530>
- <sup>25</sup> Balkan Insight, <https://balkaninsight.com/2025/05/29/bosnias-constitutional-court-scraps-serb-entitys-disputed-laws/bi/>
- <sup>26</sup> Balkan Insight, <https://balkaninsight.com/2023/07/20/bosnian-serb-assembly-criminalises-defamation-despite-free-speech-concerns/bi/>
- <sup>27</sup> Balkan Insight, <https://balkaninsight.com/2015/02/06/bosnian-serbs-adopt-net-censorship-law/bi/all-balkan-countries/>
- <sup>28</sup> Dizdarević, interview by the IRM.
- <sup>29</sup> Vejzagić, interview by the IRM.
- <sup>30</sup> Open Data Watch, <https://odin.opendatawatch.com/Report/countryProfileUpdated/BIH?year=2024>
- <sup>31</sup> See Open Data Watch Inventory Country Report, <https://odin.opendatawatch.com/ReportCreator/ExportCountryReportUpdated/BIH/2024>
- <sup>32</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027, <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-action-plan-2025-2027/>
- <sup>33</sup> Open Government Partnership, Bosnia and Herzegovina Results Report 2022-2025, <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-results-report-2022-2024/>
- <sup>34</sup> Vedrana Faladžić (PARCO), interview by the IRM, 2 December 2025.
- <sup>35</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027. <http://www.sluzbenilist.ba/page/akt/fRNPvuRCliQ=>
- <sup>37</sup> Mubera Begić (PARCO), interview by the IRM, 2 December 2025.
- <sup>38</sup> Ibid.
- <sup>39</sup> PARCO, Strategic framework for PAR and action plan for period 2018-2022, [https://parco.gov.ba/en/rju/o-rju-2/strateski-okviri-za-rju/?utm\\_source=chatgpt.com](https://parco.gov.ba/en/rju/o-rju-2/strateski-okviri-za-rju/?utm_source=chatgpt.com)
- <sup>40</sup> Ibid.
- <sup>41</sup> Open Government Partnership, Bosnia and Herzegovina Results Report 2022-2025.
- <sup>42</sup> Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the reuse of public sector information, <https://eur-lex.europa.eu/eli/dir/2019/1024/oj/eng>
- <sup>43</sup> Bubonjić, correspondence with the IRM.
- <sup>44</sup> Siniša Vukelić (executive director and editor in chief of portal Capital.ba), correspondence with the IRM, 16 March 2026.
- <sup>45</sup> Denis Džidić (executive director and editor of the Balkan Investigative Reporting Network in Bosnia and Herzegovina - BIRN BiH), correspondence with the IRM, 16 March 2026.
- <sup>46</sup> Ibid.
- <sup>47</sup> Mahmutović, correspondence with the IRM, 16 March 2026.
- <sup>48</sup> Vedrana Faladžić, Mubera Begić (PARCO), interview by the IRM, 2 December 2025.
- <sup>49</sup> Balkan Civil Society Development Network, Bosnia and Herzegovina Adopts Strategy for Civil Society Development 2025–2029, 15 July 2025, <https://balkanacd.net/bosnia-and-herzegovina-adopts-strategy-for-civil-society-development-2025-2029/>
- <sup>50</sup> European Commission, Bosnia and Herzegovina 2024 Report, [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024_en)
- <sup>51</sup> Official Gazette of BiH, Law on Amendments to the Law on Public Procurement, “No. 50/24, July 23, 2024.
- <sup>52</sup> Belma Šećibović (Public Procurement Agency of Bosnia and Herzegovina), interview by the IRM, 2 December 2025.
- <sup>53</sup> Šećibović, interview by the IRM.
- <sup>54</sup> Open Government Partnership, Bosnia and Herzegovina Results Report 2022-2025, <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-results-report-2022-2024/>
- <sup>55</sup> Ibid.
- <sup>56</sup> Emsad Dizdarević (Transparency International BiH), interview by the IRM, 26 November 2025.
- <sup>57</sup> Dario Kihli (Public Procurement Agency of Bosnia and Herzegovina), interview by the IRM, 2 December 2025.
- <sup>58</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.
- <sup>59</sup> Alen Vejzagić (CPI Foundation), interview by the IRM, 2 December 2025.
- <sup>60</sup> Vejzagić, interview by the IRM. Bičakčić, interview by the IRM.
- <sup>61</sup> Lejla Bičakčić (Center for Investigative Reporting - CIN), interview by the IRM, 27 November 2025.
- <sup>62</sup> Official Gazette of BiH, Law on the protection of personal data, <https://www.paragraf.ba/propisi/bih/novi-zakon-o-zastitilicnih-podataka.html>

<sup>63</sup> Šećibović, interview by the IRM.

<sup>64</sup> Ibid.

<sup>65</sup> Dizdarević, interview by the IRM; Bičakčić, interview by the IRM.

<sup>66</sup> Kihli, interview by the IRM; Bičakčić, interview by the IRM.

<sup>67</sup> Bičakčić, interview by the IRM.

<sup>68</sup> Open Government Partnership, IRM Bosnia and Herzegovina Results Report 2022-2024, p 15,

[https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina\\_Results-Report\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina_Results-Report_2022-2024_EN.pdf)

<sup>69</sup> Open Government Partnership, IRM Bosnia and Herzegovina Transitional Results Report 2019-2021, p 10,

[https://www.opengovpartnership.org/wp-content/uploads/2022/06/Bosnia-Herzegovina\\_Transitional-Results-Report\\_2019-2021\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/06/Bosnia-Herzegovina_Transitional-Results-Report_2019-2021_EN.pdf)

<sup>70</sup> Open Government Partnership, IRM Bosnia and Herzegovina Results Report 2022-2024, p 14,

[https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina\\_Results-Report\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina_Results-Report_2022-2024_EN.pdf)

<sup>71</sup> Open Government Partnership, Bosnia and Herzegovina, Institutional Transparency,

<https://www.opengovpartnership.org/members/bosnia-andherzegovina/commitments/BA0006/>

<sup>72</sup> Open Government Partnership, IRM Bosnia and Herzegovina Results Report 2022-2024, p 16,

[https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina\\_Results-Report\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina_Results-Report_2022-2024_EN.pdf)

<sup>73</sup> Open Government Partnership, IRM Bosnia and Herzegovina Results Report 2022-2024, pp 15-16,

[https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina\\_Results-Report\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina_Results-Report_2022-2024_EN.pdf)

<sup>74</sup> Open Government Partnership, IRM Bosnia and Herzegovina Results Report 2022-2024, p 17,

[https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina\\_Results-Report\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2025/10/Bosnia-Herzegovina_Results-Report_2022-2024_EN.pdf)

## Section III. Methodology

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM reviews commitments using three indicators:

**1. Verifiability:** The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

**2. Open Government Lens:** The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized, or underrepresented groups?

Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, etc.)? Will the government improve legal, policy, institutional, or practical conditions related to civic space such as freedom of expression, association, and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking, or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

**3. Potential for Results:** The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g. websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Svjetlana Ramic Markovic as researcher and Jeff Lovitt as external expert reviewer. During the internal review process, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).<sup>1</sup> The IRM methodology, product quality, and review process are overseen by the IEP.<sup>2</sup>

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<sup>1</sup> Open Government Partnership, International Experts Panel, accessed 15 July 2024, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>2</sup> For more information, see: Open Government Partnership, Overview – Independent Reporting Mechanism, accessed 15 July 2024, <https://www.opengovpartnership.org/irm-guidance-overview>.

## Annex I. Commitment Data<sup>1</sup>

### **Commitment 1: Raising awareness and informing civil society organizations about the importance of beneficial ownership**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

### **Commitment 2: Risk assessment of NGOs' vulnerability to misuse for money laundering and financing of terrorism**

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

### **Commitment 3: Simplification of the registration procedure for NGOs through computer software that automatically generates the required registration documents**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

### **Commitment 4: Coordination of the open data ecosystem development (public data good)**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

### **Commitment 5: Improving transparency in the institutions of BiH**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

### **Commitment 6: Transparent public procurement contracts**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

### **Commitment 7: Use of administrative data sources and continued implementation of online databases for users**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

**Commitment 8: Enhancing budget transparency and access to public finance information**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

**Commitment 9: Establishment of an electronic register of budgetary allocations from the budget of BiH institutions**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

**Commitment 10: Institutionalization of public communication on the corruption prevention system**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

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<sup>1</sup> Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, see: <https://www.opengovpartnership.org/documents/bosnia-and-herzegovina-action-plan-2025-2027/>

## Annex II. Action Plan Co-Creation

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.<sup>1</sup> Countries are encouraged to aim for the full ambition of the standards and to meet the minimum requirements.<sup>2</sup> The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.<sup>3</sup>

**Table 2. Compliance with Minimum Requirements**

Minimum requirement	Met?
<p><b>1.1 Space for dialogue:</b> In BiH, the Advisory Council of the Open Government Partnership Multi-Stakeholder Forum Initiative (Advisory Council) serves as the multi-stakeholder forum for OGP. The Advisory Council's rules of procedure are available on the website of the Public Administration Reform Coordinator's Office (PARCO)<sup>4</sup> and on the website of the Ministry of Justice of BiH.<sup>5</sup> The minutes of the Advisory Council's meetings are available on the Ministry of Justice of BiH's website.<sup>6</sup></p> <p>During the co-creation process of the third action plan (May 2024-February 2025), the Advisory Council met three times: on 28 May 2024 and 16 October 2024 to discuss the plan and draft the commitments, and on 20 January 2025 to finalize the plan and submit it to the Council of Ministers of BiH for consideration. From 19 February to 6 March 2025, a consultation on the draft action plan was held on BiH's e-consultation platform.<sup>7</sup> Although the action plan mentions that "a series" of Advisory Council and interdepartmental consultative meetings were held from May to December 2024, there are no minutes of these meetings on the Ministry of Justice of BiH's OGP repository. The Council of Ministers of BiH officially adopted the action plan at its 84<sup>th</sup> session on 8 July 2025. The Advisory Council met on 16 December 2025, the first meeting since the adoption of the action plan.</p>	Yes
<p><b>2.1 OGP website:</b> The Ministry of Justice of BiH maintains an OGP section on its official website, including publishing all relevant reports, minutes of Advisory Council meetings, and a brief description of the co-creation process.<sup>8</sup> There is also a separate OGP website (<a href="http://ogp.ba">http://ogp.ba</a>), which is inactive. The domain for this website continues to be paid but there is a problem with the server.<sup>9</sup></p>	Yes
<p><b>2.2 Repository:</b> The Ministry of Justice of BiH publishes the current and past action plans, relevant reports, and minutes of Advisory Council meetings on the OGP section of its website. The website was updated at least twice a year with evidence regarding the co-creation process.<sup>10</sup></p>	Yes
<p><b>3.1 Advanced notice:</b> The Ministry of Justice of BiH did not publish a co-creation timeline and overview of opportunities for stakeholders to participate on the OGP website at least two weeks before the start of the action plan co-creation process (May 2024), as required under Standard 3. There was no publicly available invitation on the website before or during the consultation process or in the information on the e-consultation process. The Ministry of Justice of BiH sent invitations for the Advisory Council two weeks in advance<sup>11</sup></p>	No

while the e-consultations were available to the public during the period 19 February to 6 March 2025 at <a href="http://www.ekonsultacije.gov.ba">www.ekonsultacije.gov.ba</a> . <sup>12</sup>	
<b>3.2 Outreach:</b> The Ministry of Justice of BiH sent an invitation for participation in the co-creation process to all institutions, but no institution took part. <sup>13</sup> No other outreach activities were implemented. Some Advisory Council members have voiced concern that although the Advisory Council's meetings are open to the public, limited promotion of the OGP process resulted in low levels of attendance. <sup>14</sup>	Yes
<b>3.3 Feedback mechanism:</b> Stakeholders' inputs were gathered during Advisory Council meetings and through an online consultation of the draft action plan from 10 February to 6 March 2025, in line with the Rules for Consultations in Drafting Legal Regulations. <sup>15</sup>	Yes
<b>4.1 Reasoned response:</b> The Ministry of Justice of BiH submitted a report on the two-week online consultation, together with the action plan proposal, to the Council of Ministers of BiH for consideration and adoption. <sup>16</sup> The minutes of the Advisory Council meetings demonstrate open discussions on all topics between government and non-government representatives. <sup>17</sup> Several non-government representatives expressed satisfaction with the level of open dialogue with the government. <sup>18</sup> The OGP point of contact in the Ministry of Justice of BiH emphasized that the lack of engagement during the online consultation period indicated low public interest. <sup>19</sup>	Yes
<b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable

<sup>1</sup> Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

<sup>2</sup> Open Government Partnership, Independent Reporting Mechanism, IRM Guidelines for the Assessment of Minimum Requirements, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf).

<sup>3</sup> On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024, <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; For information on the OGP Procedural Review Policy see: <https://www.opengovpartnership.org/procedural-review/#IC>.

<sup>4</sup> Public Administration Reform Coordinator's Office (PARCO), OGP, <https://parco.gov.ba/hr/ogp/>

<sup>5</sup> PARCO, Rules of Procedure of the Advisory Council of the Open Government Partnership Initiative, <https://parco.gov.ba/wp-content/uploads/2019/03/Poslovnik-Savjetodavno-vijece.pdf>

<sup>6</sup> Ministry of Justice, OGP, <http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=hr-HR>

<sup>7</sup> Report on the conducted consultations with the interested public, see: <https://ekonsultacije.gov.ba/consultations/reports/1085846>.

<sup>8</sup> Ministry of Justice, OGP, <http://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=hr-HR>.

<sup>9</sup> Alen Vejzagić (CPI Foundation), interview by the IRM, 2 December 2025.

<sup>10</sup> Ibid.

<sup>11</sup> Selma Džihanović-Gratz (Ministry of Justice of Bosnia and Herzegovina), interview by the IRM, 18 November 2025.

<sup>12</sup> Open Government Partnership, Bosnia and Herzegovina Action Plan 2025-2027.

<sup>13</sup> Džihanović-Gratz, interview.

<sup>14</sup> Mubera Begić, Vedrana Faladžić (PARCO), interview by the IRM, 2 December 2025.

<sup>15</sup> Ministry of Justice, Rules for Consultations in Drafting Legal Regulations, see: [https://mpr.gov.ba/web\\_dokumenti/default.aspx?id=11087&langTag=bs-BA](https://mpr.gov.ba/web_dokumenti/default.aspx?id=11087&langTag=bs-BA).

<sup>16</sup> Report on consultations held with the interested public, Preliminary draft of the Action Plan of the Council of Ministers of Bosnia and Herzegovina for the implementation of the Open Government Partnership initiative 2025-2027, correspondence with the Ministry of Justice, 19 November 2025.

<sup>17</sup> Ministry of Justice, Minutes from 11th and 12th Advisory council sessions, <https://www.mpr.gov.ba/reload/default.aspx?id=10936&langTag=bs-BA>.

<sup>18</sup> Alen Vejzagić, interview. Bičakčić, interview. Emsad Dizdarević, interview.

<sup>19</sup> Džihanović-Gratz, interview. Kihlj, interview.