



Report on the Roma Civil Registration Information Campaign

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OSCE Mission to Bosnia and Herzegovina

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1. The Context

As a part of the OSCE Mission to Bosnia and Herzegovina's efforts to improve the human rights situation in one of the most vulnerable ethnic minority groups in Bosnia and Herzegovina (Roma), the Human Rights Department conducted the project/information campaign in all the municipalities where Roma with identified registration problems reside.

The purpose of the report is to raise awareness of the relevant actors about the problem of lack of identification documents of Roma children. The report is envisaged to reach Roma leaders, government institutions, NGOs, hospitals, international organizations and all other actors who could get involved in reducing the number of unregistered children, and in order to assist better integration of Roma in the BiH society and all its segments.

1.1 Background

Civil registration is a procedure to collect and record the vital events of a person's life, such as birth, marriage and death. People without a birth certificate in Bosnia and Herzegovina are unable to access rights such as education and health care or to participate in civic life.

In 2003, the Roma NGO Kate Acha, with the support of the OSCE Human Rights Department (HRD), conducted a Civil Registration Pilot Project, which consisted of an information campaign; meetings with local authorities; the collection of documents from parents or advising them on how to obtain these documents; and assistance to Roma with the actual registration.

The reasons identified during the pilot project for Roma parents not to register their children were as follows:

- Lack of awareness on the part of Roma of the legislation that obliges all citizens to register newborn children;
- Complex procedures for registering children after the statutory 15 day period from the date of birth, including the requirement upon parents to produce supporting documents or witnesses to verify the identity of their child;
- Costs associated with the late registration, transport and other expenses;
- Hospitals refusing to issue a document stating that the child was born, since a lot of Roma mothers are not covered by health insurance and cannot afford to pay hospital fees;
- Difficulty for parents of children born abroad to get hold of documents from the countries where children were born;
- For children born during and after the war, the breakdown of civil services and the displacement of Roma families from their pre-war homes.

Based on the information collected during the Pilot Project, in 2004 the HRD developed a Roma Civil Registration Information Campaign to be conducted across the country, in all municipalities where Roma population resides and registration appears to be a problem. The Campaign was prepared during the months of July and August. It took place in September 2004. As a follow-up activity, the OSCE HRD visited Municipal registry offices to check the results of the Campaign.

1.2 The Human Rights Obligations of the Government

Despite their obligation to register every child at birth, many governments do not recognize birth registration as a priority. Limited understanding of birth registration means that

governments are often passive about the issue and do not pay sufficient attention to promoting it in their countries. BiH is one of those countries that have taken a passive approach towards the issue. To the knowledge of the Mission, there have been no cases where the registration of a Roma child was denied. The problem is more in the fact that BiH government has not taken an active approach in order to reduce this problem.

Concerning state obligations regarding civil registration, Bosnia and Herzegovina has ratified the UN Convention on the Rights of the Child, which states in Article 7 that:

“1. The child shall be registered immediately after birth and shall have the right from birth to a name, the right to acquire a nationality and, as far as possible, the right to know and be cared for by his or her parents.

2. States Parties shall ensure the implementation of these rights in accordance with their national law and their obligations under the relevant international instruments in this field, in particular where the child would otherwise be stateless. “

Bosnia and Herzegovina has also ratified or succeeded to other international human rights instruments which put obligations on relevant governmental authorities regarding civil registration for Romani children and members of the Roma community in general. For example, Article 24 of the International Covenant on Civil and Political Rights stipulates that “[e]very child has the right to acquire a nationality.”

Further, on the issue of statelessness (i.e. persons without nationality), BiH is obligated under Article 32 of the 1954 Convention Relating to the Status of Stateless Persons to “as far as possible facilitate the [...] naturalization of stateless persons. They shall in particular make every effort to expedite naturalization proceedings and to reduce as far as possible the changes and costs of such proceedings.”

BiH is also obligated under the Convention on the Reduction of Statelessness to prevent statelessness through loss of nationality due to changes in personal status. Article 8 of the Convention provides that “[a] Contracting State shall not deprive a person of his nationality if such deprivation would render him stateless.” Further, Article 9 provides that “a State may not deprive any person or group of persons of their right to nationality on racial, ethnic, religious or political grounds.”

1.3 Aims and Objectives of the Campaign

The main activity of the Roma Civil Registration Information Campaign was to provide information to Roma communities about the value of civil registration and the procedures that must be followed; and to inform public officials of their obligations to communicate and register all births in BiH. The output of the Campaign was the increased awareness of the population about the registration, and the Campaign’s main objective was to increase the registration of Roma children in order to improve access to their rights.

1.4 Target Group

The Roma Civil Registration Information Campaign targeted people with a direct interest in civil registration; people who would potentially come into contact with Roma in the course of the civil registration process; and people with legal obligations with respect to civil registration.

1.5 Methodology

The Roma Civil Registration Information Campaign was developed and coordinated by the HRD Head Office of the OSCE Mission to Bosnia and Herzegovina. The identification of Roma settlements where registration was an issue as well as the field implementation of the Campaign were conducted by the OSCE Field Offices' focal points and local Roma activists. The Campaign took place in September 2004 and included 29 municipalities, containing 92 Roma settlements.¹

Legal Aid Centers of the national NGO Vasa Prava ('VP') had a crucial role in the Campaign. Their contact information was included in the campaign information materials so that Roma could ask for further assistance and additional information about the registration process, especially in cases of particular complexity. In some areas, VP sent their mobile teams to visit Roma settlements during the campaign and provided additional support to the inhabitants.²

2. Campaign Activities

- A briefing session was organized in OSCE Head Office, during which all the focal points from the OSCE field offices were informed about the Campaign and given clear instructions on how to conduct it;
- VP field offices were informed about the Campaign and they agreed to provide Roma with further legal assistance;
- Posters and leaflets were designed, printed and sent to the field. The information materials contained basic information about civil registration and contact information about VP field offices;
- Roma Activists from settlements covered by the Campaign were hired and briefed by the OSCE field offices' focal points to work on the Campaign in the Roma settlements;
- Prior to the Campaign, the OSCE focal points, along with Roma activists, visited the settlements and conducted a pre-assessment of the situation with regard to registration;
- The OSCE focal points held meetings with municipal registry offices in order to inform them about the Campaign;
- Roma activists distributed posters and leaflets;
- The Campaign itself was conducted in two ways:
 - "Public forums" were organized in Roma settlements where the lack of civil registration affected many people. Due to a large number of Roma interested in the Campaign, Roma activists organized public discussions to inform Roma of the purpose of the Campaign, registration procedures, legal obligations for registering children and other useful information. They were also informed that VP offices were willing to provide them with further assistance in this matter;
 - Some of the Roma activists visited Roma families individually and informed them about the registration, explained the registration procedure to them and

¹ The list of municipalities and Roma settlements covered by the Campaign can be found in Annex 1, at the end of this report.

² For example, in Samac (area covered by OSCE FO Orasje), OSCE agreed with VP that a VP lawyer would visit Roma individuals who needed assistance in registration. The OSCE provided the lawyer with a list of persons who claimed they needed to be registered. Another example is Mostar area, where VP teams were present during the briefing session between the OSCE field offices focal points and Roma activists. On this occasion, future cooperation was agreed between VP and Roma representatives, and VP committed itself to providing Roma with all the necessary legal assistance regarding civil registration.

assisted parents in obtaining documents for the registration of their children. They were also informed about VP's involvement. Individual visits allowed Roma activists to focus their efforts on settlements where there were not many unregistered children, and therefore it was decided to use the Roma activists' involvement in a more effective way by concentrating their efforts on helping individuals gather the documentation necessary for civil registration;

- Press statements were issued by the OSCE regional centres. Many radio and TV stations visited the settlements to get additional information about the Campaign, which was widely covered by the local media.

3. Campaign Results

It was premature to assess its results in terms of how many children were registered immediately after the Campaign, as in many cases this would be a lengthy process due to its legal complexities. This was left to be done as a follow-up activity. However, a number of other important results were achieved during the Campaign:

- The Roma population was widely informed about the rights and obligations related to the issue of civil registration. The focus was put on the benefits of registration. According to the reports from the OSCE focal points, the awareness of Roma about the importance of civil registration was increased: they understood better that the registration is for the benefit of their children in terms of future possibilities in education, health care and other social benefits;
- Contacts between the Roma population and municipal registry offices were established, which would help Roma in completing the registration more easily in the future;
- Contacts between Roma population and the local Legal Aid Centres were established, and as a result Roma will be able to seek further legal assistance if needed in the future;
- In some areas, Roma were exempted from paying taxes for late registration;
- Awareness about the problem was raised by the Campaign through media and Roma activists;
- All the Roma activists involved in the Campaign showed a high level of involvement and performed their duties in a professional manner. During the Campaign, the cooperation between OSCE and Roma population was strengthened, and Roma activists with whom it is possible to cooperate in the future were identified.

The Civil Registration Campaign was planned so that it would coincide with the beginning of the school year, in order to get more children enrolled. According to the reports from the field, the registration is likely to be taken more seriously by Roma parents if they have a direct link to its benefits, which can be seen at once if immediately after the registration children start attending school.

As a follow-up activity, the following information on the number of Roma registered since the beginning of the Campaign was gathered by the OSCE focal points at the end of January 2005:

Area of responsibility covered by the OSCE Regional Centre Banja Luka:

Persons identified without the birth certificate: 37

Out of these 37, persons obtained a birth certificate: 14

Area of responsibility covered by the OSCE Regional Centre Mostar:

Persons identified without the birth certificate: 11
Out of these 11, persons obtained a birth certificate: 0

Area of responsibility covered by the OSCE Regional Centre Sarajevo:

Persons identified without the birth certificate: 12
Out of these 12, persons obtained a birth certificate: 10

Area of responsibility covered by the OSCE Regional Centre Tuzla:

Persons identified without the birth certificate: 422
Out of these 422, persons obtained a birth certificate: 126

The total number of persons that obtained their birth certificate since the beginning of the Campaign until the end of January is 218.

Note These figures do not necessarily reflect the extent to which the registration problem is present in a particular area, nor the level of effectiveness of the Campaign in different areas. They simply show the results of the Campaign in terms of the number of Roma registered. The number of Roma registered in a certain area depended on various factors: in some areas, the Roma population is larger than in the others; in some areas, the registration problem is not as large as in the others, etc.

4. Follow-up Activities/Further work

In October 2004, the Roma Officer (RO) at the Head Office organized a debriefing session on the Roma Civil Registration Information Campaign for the focal points assigned to work on it. At this meeting, the Campaign actions, findings and results were presented by the focal points in the field. Based on the input from the field staff, a list of follow-up activities for the field was produced and those activities were carried out by the field staff in the following months.

Since it is very difficult to achieve civil registration only through a campaign, the purpose of the follow-up activities was to ensure that, through increased awareness of all parties involved, civil registration of Roma becomes more frequent and more efficient in the future.

The list of the follow-up activities related to the civil registration of Roma carried out by the HRD field staff:

1. Post-campaign assessment. The OSCE focal points involved in the Campaign assessed the Campaign results. This was done through meetings with municipal registry offices in order to find out how many Roma were registered in the period from September 2004 to January 2005.
2. Exemption from paying taxes. Some of the Roma activists involved in the Campaign succeeded in obtaining exemption for individuals from paying taxes to municipalities for late registration. The OSCE focal points shared this information with other Roma activists in their area of responsibility, so that they could try to do the same for individuals who still have to be registered.³ It should be remarked that exemption from taxes is only possible for taxes required by the municipality, and not for those asked by the police.

³ Legally, there is no provision regulating exemption from taxes for late registration. It was through the good cooperation and willingness of local authorities that some Roma were exempted from paying taxes.

3. Meeting with the local police. Focal points held meetings with the local police and let them know of the initiative for raising awareness among the Roma population about the importance of the registration. The purpose of this meeting was to bring the Campaign to the attention of the local police, since they might have more people than usual coming and applying for the late registration at the same time.⁴
4. Meeting with hospitals: legal obligations. The OSCE focal points will meet with hospitals. According to the Law on Registry Books (for the RS: OG no. 18/99; for Federation: RBIH OG no. 20/92), health care institutions are obliged to send a list of children born in their facilities to the registry offices within the prescribed deadline. At the meetings, the OSCE focal points will bring the issue to the attention of hospital directors, reminding them of their legal obligations and encouraging them to establish a system for sending information on children born in their institutions to the respective municipal registry offices within the deadline prescribed by the law.
5. Meeting with centres for social welfare. During the Campaign, situations were identified where parents or guardians of Roma children were not interested in their registration. Usually, the cases identified during the Campaign were of children not properly taken care of in a more general way, so the registration would be just one of the issues of concern. It was recommended that centres for social welfare (CSW) bear in mind that the children might have a registration problem as well when looking into this category of children. It was agreed that the OSCE focal points would schedule meetings with local CSWs and let them know about the Campaign and about this particular problem. The OSCE focal points would not point out nor disclose specific names identified in the course of the Campaign.
6. Vasa prava (VP). Generally, the co-operation between the OSCE focal points and the VP field offices was good. However, in some areas VP field offices were more active than in others. In some areas, VP mobile teams committed themselves to visiting the Roma settlements to provide legal assistance to individuals in the registration procedures. Therefore, it was decided that other OSCE focal points should contact VP field offices from their area of responsibility, report on the best practices observed in other areas and try to achieve the same.

Further work

After the follow-up activities have been carried out by the OSCE focal points from the field, the Roma Officer will visit the OSCE regional centres in order to identify the role of the OSCE in further improvement of civil registration of Roma in the future at the regional level. This is due to the fact that the regional workload on Roma registration issues varies according to the number of Roma communities present in different AoRs. It is also due to the fact that the OSCE does not have the capacity to get involved in all activities related to the improvement of the civil registration of Roma.

5. General Recommendations and Conclusions

The OSCE Mission to Bosnia and Herzegovina, in co-operation with Roma activists from the field, successfully completed the Campaign. However, the issue of lack of registration among the Roma population in BiH has not been resolved as a result of the Campaign. It is important that the Roma population in BiH understand why the registration is a key to the enjoyment of their rights and a non-discriminatory access to public services for all individuals. Furthermore, registration of Roma is an issue requiring special attention by all

⁴ The local police is a part of the process of the late registration, as opposed to the registration within the deadline defined in the Law, in which case an individual is obliged to go only to the municipal registry office.

public officials involved in the process, and local organizations and civil society at large need to support the actions of local authorities with their expertise.

5.1 Recommendations for different actors

1. Public Institutions:

Provide all necessary pre-conditions for the registration, having in mind the specific background of the problem of Roma not registering their children. Co-operation between health institutions and municipal registry offices should be strengthened, awareness-raising among Roma should be conducted on a regular basis, and the issue should be closely followed at the local level. According to the Law on Registry Books (for the RS: OG no. 18/99; for Federation: RBIH OG no. 20/92), health institutions are obliged to send a list of children born in their facilities to the registry offices within the deadline prescribed.

During the whole process, the sensitivity of the issue should be taken into consideration, since Roma are often not aware of the registration deadlines, and once they miss the deadline, they do not want to register their children for fear of having additional obligations, such as paying additional taxes and eventually being fined for not abiding by the law. Therefore, the approach should be to focus on the benefits acquired by children if their parents register them rather than stressing the consequences of not abiding by the legal obligations.

2. Roma Community Leaders:

During the Campaign, it was noted that many Roma do not register due to the lack of information on relevant procedures. While the burden of informing individuals about rights and services must fall with the Government, some responsibility for the small registration percentage comes from the Roma themselves. Roma leaders need to take a more active approach in promoting civil registration of children from their settlements, both by informing the parents about the importance of it and by providing guidance to individuals on how to navigate the relevant procedures. Activism and continual engagement of Roma representatives within individual communities will be key to the future improvement of the situation. This particularly needs to be done because civil registration represents a key way for Roma to avail themselves of existing forms of social services and to become more involved in public life and society in general.

3. Non-Governmental Organisations:

All NGOs (Roma and non-Roma, local and international) are strongly encouraged to assist the Roma population in the civil registration process. Local Roma NGOs and advocates should focus on assisting the Roma population in overcoming practical obstacles that prevent their registration, while other NGOs should dedicate resources to building the capacity of Roma organisations. This recommended approach entails raising awareness of the importance of registration, providing Roma with information about the registration procedures, along with assisting individual cases in obtaining documents necessary for the registration.

4. International Organisations:

International agencies and other organisations operating in BiH should support or help develop Roma and non-Roma NGO initiatives promoting civil registration and greater civic responsibility and integration. International organisations can be particularly helpful in helping NGOs to locate and secure sources for funding projects related to registration. All actors should include capacity-building elements as a core component of projects involving Roma NGOs.

International organisations should also have a role in encouraging local governmental institutions to act in compliance with the existing legislation and, most importantly, with international human rights standards by which BiH is bound. International organisations should increase their engagement in assisting the registration of refugees, as the legislation pertaining to refugees is different. This is particularly related to the category of “children born abroad whose parents are not citizens of BiH”, mentioned in the text below.

5.2 Specific issues to take into consideration when dealing with Roma registration issues in the future

Children born at home

One of the issues raised during the individual discussions with the OSCE Focal Points from the field is what to do with children who were born at home. Point 4 above (the legal obligations of health care institutions) addresses only the issue of children born in hospital, but there is no clarity on how to deal with cases where children are born at home, when there is no strategy or initiative from any institution (e.g. centre for social welfare, municipality, health care institutions, etc.) to record such births. According to the findings from the Campaign, a significant number of Roma children are born at home. This issue is left for further discussion and should be taken into account by all actors who are involved in the civil registration of Roma. The Government needs to find a sustainable solution to this problem.

On 21 July 2005, the BiH Council of Ministers adopted the National Strategy for Roma and its purpose is to address specific needs of Roma in a more structured way. One of the issues covered in the Strategy is civil registration and identification documents. The positive sides of this document are that it explicitly recognizes not only that the difficulties in life of Roma exist, but also that extensive work and commitment from all levels of Government are needed to address these systemic problems. However, although the initiative of adopting the Strategy at the state level has been recognized by the international community as a positive first step towards resolving the problems faced by Roma, its structure and lack of concrete steps and responsible bodies for its implementation as well as the lack of specified budget has been highly criticized.

As a follow-up step, the Ministry of Human Rights and Refugees has agreed to use the Strategy as a starting point in developing and adopting action plans on different topics from the Strategy in the future, making them more specific and more simple to implement.

In conclusion, there is insufficient strategy on how to address the issue of the lack of registration of Roma children in the Strategy, and therefore, there has to be more effort put by the Government in the future in order to overcome this problem.

Children born abroad

Obviously, children who were born abroad do not fall under the general procedures covered by this Campaign, but that does not lessen the urgency of their problems. The registration procedures for these children are different: they should be further investigated and taken into consideration by all actors who decide to deal with Roma civil registration issues in the future. There should be a mechanism established for those who were forcibly returned in BiH from abroad after the war. Ensuring that the BiH citizens obtain their personal documents before returning to BiH should be a part of the voluntary return scheme. Also, the governments of countries from which Roma are forcibly repatriated to BiH need to be more active in understanding the practical limitations of Roma that were born abroad and then returned to BiH. Prior to their return, these individuals need to be assisted in obtaining all necessary documents available in the host country that are needed for civil registration.

Children born in BiH whose parents are not citizens of BiH

This is a very important note for further work on civil registration by all possible actors in the future. During the Campaign, many children whose parents are not citizens of BiH were identified, several of whom originated from Kosovo. Late registration in such cases is particularly complex and requires special assistance for children and parents alike when applying for such aid when dealing with it. The OSCE did not deal with cases from this particular group as part of this effort, but recommends that such individuals should be prioritized for action in the immediate future.

Empowerment of Roma NGOs

The OSCE focal points identified the need for Roma NGOs to undergo training in order to learn basic things about the NGO sector, such as: how to prepare a project proposal, how to lobby for funds, etc. Both international organisations and donors should look into the possibility of incorporating such training as a component of their projects.

Annex 1:

List of Municipalities and Roma Settlements covered by the Campaign

	ROMA SETTLEMENT	MUNICIPALITY	OSCE FIELD OFFICE
1.	Karaula	Travnik	FO Travnik
2.	Turbe	Travnik	FO Travnik
3.	Beslije	Travnik	FO Travnik
4.	Ocice	Vitez	FO Travnik
5.	Kruscica	Vitez	FO Travnik
6.	Hrastovi	Kiseljak	FO Travnik
7.	Svinjarevo	Kiseljak	FO Travnik
8.	Kupresani	Jajce	FO Bugojno
9.	Buca Potok	Novi Grad	FO Sarajevo
10.	Anex	Novi Grad	FO Sarajevo
11.	Stari Ilijas	Ilijas	FO Sarajevo
12.	Butmir	Ilidza	FO Sarajevo
13.	Rupin do	Zavidovici	FO Zenica
14.	Dragovacki put	Zavidovici	FO Zenica
15.	Zeljeznicka stanica	Zavidovici	FO Zenica
16.	Town center	Zavidovici	FO Zenica
17.	Gracanica	Zenica	FO Zenica
18.	Lukovo polje	Zenica	FO Zenica
19.	Kamenolom	Zenica	FO Zenica
20.	Kanal	Zenica	FO Zenica
21.	Banlozi	Zenica	FO Zenica
22.	Travnicka str.	Zenica	FO Zenica
23.	Radakovo	Zenica	FO Zenica
24.	Blatusa	Zenica	FO Zenica
25.	Crkvice	Zenica	FO Zenica
26.	Babina rijeka	Zenica	FO Zenica
27.	Town center	Zenica	FO Zenica
28.	Varda	Kakanj	FO Zenica
29.	Povezice	Kakanj	FO Zenica
30.	Zeljeznickak satnica	Kakanj	FO Zenica
31.	Town center	Kakanj	FO Zenica
32.	Kriz	Visoko	FO Zenica
33.	Ljtvovik	Visoko	FO Zenica
34.	Gracanica	Visoko	FO Zenica
35.	Perutac	Visoko	FO Zenica
36.	Mostre	Visoko	FO Zenica
37.	Muhsinovici	Visoko	FO Zenica
38.	Town center	Visoko	FO Zenica

	ROMA SETTLEMENT	MUNICIPALITY	OSCE FIELD OFFICE
39.	Olanovica	Kalesija	FO Zvornik
40.	Staro selo	Kalesija	FO Zvornik
41.	Ciljuge I	Zivinice	FO Tuzla
42.	Ciljuge II	Zivince	FO Tuzla
43.	Sjever I	Zivinice	FO Tuzla
44.	Sjever II	Zivinice	FO Tuzla
45.	Bisinska str./Bare	Zivinice	FO Tuzla
46.	Nevrenca	Zivinice	FO Tuzla
47.	Oskova	Banovici	FO Tuzla
48.	Cubric	Banovići	FO Tuzla
49.	Veseli brijeg	Banovići	FO Tuzla
50.	Skahovica	Gracanica	FO Tuzla
51.	Donja orahovica	Gracanica	FO Tuzla
52.	Grabovica	Gracanica	FO Tuzla
53.	Rsljevo	Gracanica	FO Tuzla
54.	Kiseljak	Tuzla	FO Tuzla
55.	Crvene njive	Tuzla	FO Tuzla
56.	Krojcica	Tuzla	FO Tuzla
57.	Mosnik	Tuzla	FO Tuzla
58.	Mosnicki potok	Tuzla	FO Tuzla
59.	Miladije	Tuzla	FO Tuzla
60.	Svatovac	Lukavac	FO Tuzla
61.	Lukavac mjesto	Lukavac	FO Tuzla
62.	Kuljeno	Lukavac	FO Tuzla
63.	Copor	Bijeljina	FO Bijeljina
64.	Rupace	Bijeljina	FO Bijeljina
65.	Wild west	Bijeljina	FO Bijeljina
66.	Modricki lug	Vukosavlje	FO Orasje
67.	Dzahmetovaca	Modrica	FO Orasje
68.	Strazevac	Modrica	FO Orasje
69.	Vojvode Putnika	Modrica	FO Orasje
70.	Potok mahala	Modrica	FO Orasje
71.	Pozarike	Gradacac	FO Orasje
72.	Begovina	Gradacac	FO Orasje
73.	Kralupe	Konjic	FO Mostar
74.	Ostrozac	Konjic	FO Mostar
75.	Bokulja	Jablanica	FO Mostar
76.	Sljunkara	Jablanica	FO Mostar
77.	Karasebes	Mostar	FO Mostar
78.	Sjeverni logor	Mostar	FO Mostar
79.	Vrapcici	Mostar	FO Mostar

	ROMA SETTLEMENT	MUNICIPALITY	OSCE FIELD OFFICE
80.	Autobuska stanica	Mostar	FO Mostar
81.	Ruzica	Bihac	FO Bihac
82.	Tekija	Bosanska Krupa	FO Bihac
83.	Svetinja	Bosnska Krupa	FO Bihac
84.	Veseli Brijeg	Banja Luka	FO Banja Luka
85.	Dubrave	Gradiska	FO Banja Luka
86.	Zeravica	Gradiska	FO Banja Luka
87.	Lipovaca	Gradiska	FO Banja Luka
88.	Laminci/Brezinci	Gradiska	FO Banja Luka
89.	Rovine	Gradiska	FO Banja Luka
90.	Rudnicka street	Prijedor	FO Prijedor
91.	Kozarska Street	Prijedor	FO Prijedor
92.	Hambarine	Prijedor	FO Prijedor