

Republic of Croatia

**Ministry of Justice and Public Administration
And
State Geodetical Administration**

**Integrated Land Administration and Justice
Services Project**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

January 22, 2024

OPN

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Croatia (the Borrower) will implement the Integrated Land Administration and Justice Services Project (the Project), with the involvement of the Ministry of Justice and Public Administration (MoJPA) and State Geodetic Agency (SGA), as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing (P180605) for the Project, as set out in the referred agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through the MoJPA and SGA, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower, represented by the Project Director of the Project Implementation Unit (PIU) within the MoJPA. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s), that takes into account the necessary measures to handle grievances related to Gender Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment (GBV/SEA/SH).</p>	<p>Submit semi-annual (progress) reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 30 calendar days after the end of each reporting period.</p>	PIU
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Develop an internal incidents and accidents reporting procedure as a supplement to the Environmental and Social Management Framework (ESMF) to comply with the requirements in the ESCP.</p> <p>Subsequently, at the Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>No later than one (1) month after the Effective Date</p> <p>Provide subsequent report to the Bank within a timeframe acceptable to the Bank</p>	PIU
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms/entities to provide monthly monitoring reports on ESHS performance to PIU in accordance with the metrics specified in the respective bidding documents and contracts. Assess the contractors’ environmental and social performance as part of the semi-annual progress reports.</p> <p>Share contractors and supervising firms/entities’ reports upon the Bank’s request.</p>	<p>Semi-annually following effectiveness as part of the semi-annual project’s reports.</p> <p>Upon the Bank’s request.</p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE Establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an experienced environmental expert and an experienced social expert.</p> <p>Assess the overall project’s capacity for environmental and social risk management and hire additional experts based on needs.</p>	<p>Establish the PIU, including the experienced environmental and social experts, no later than forty-five (45) days after the Effective Date and thereafter maintain throughout Project implementation.</p> <p>During project implementation.</p>	<p>PIU</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1. Adopt and implement an Environmental and Social Management Framework (ESMF), consistent with the relevant ESSs.</p> <p>2. Prepare, disclose, consult upon, adopt, and implement the site-specific appropriate Environmental and Social Instruments, as set out in the ESMF, including, <i>inter alia</i>, Environmental and Social Management Plan (ESMP), ESMP Checklists, a Cultural Heritage Management Plan (CHMP), when required according to the ESMF and report their implementation. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. Only low and moderate E&S risk activities as classified by the Bank shall be eligible for financing. Further eligibility conditions shall be defined in the ESMF.</p>	<p>Adopt the ESMF no later than one (1) month after the Effective Date and thereafter implement throughout Project implementation.</p> <p>Adopt the relevant E&S instrument before launching the bidding process for the respective Project activities that require the adoption of such E&S instrument and thereafter implement throughout Project implementation.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>SOCIAL ASSESSMENT (SA) Implement recommendations presented in the Project’s social assessment dated October 2023 which was commissioned as part of the Project preparation.</p>	Implement recommendations presented in the social assessment to inform design of site-specific activities and management of risks throughout Project implementation.	PIU
1.4	<p>MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	As part of the preparation of procurement documents and respective contracts. Supervise compliance by contractors throughout Project implementation.	PIU
1.5	<p>TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), designs, capacity building, training, and any other technical assistance (TA) activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	PIU
1.6	<p>ASSOCIATED FACILITIES In the event that associated facilities are identified during the screening of site-specific activities (or otherwise identified), ensure that the activities in the identified associated facility are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the preparation and implementation of relevant ESF instruments (e.g., the ESMP, LMP, CHMP, ESMP Checklist, Control List of Materials, management of contractors, SEP, etc.).</p>	Prior to bidding of contracts where presence of Associated Facilities is identified.	PIU
1.7	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING In the case of retroactive financing of a past or ongoing activity, conduct an environment and social audit and take any remedial actions required to ensure compliance with the relevant ESSs in a manner acceptable to the Bank.</p>	Prior to the submission of a withdrawal application for expenditures related to the activity subject to retroactive financing.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedure (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationship, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP no later than one (1) month after the Effective Date and thereafter implement the LMP throughout Project implementation.	PIU
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Ensure that all contractors develop occupational health and safety measures (OHS) in the OHS Management Plan and are included in the ESMPs/ESMP Checklists for site-specific activities, including emergency preparedness and response measures, project workers training to heighten awareness of possible risks (PPE, first aid, firefighting equipment, etc.), injuries, based on ESMF defined principles and procedures commensurate with the risks and impacts of the site-specific activities. Monitor that OHS standards are met at workplaces in line with national occupational health and safety legislation, ESS2 OHS requirements, WB EHS guidelines, and WHO and WB guidelines on infection Pre prevention.</p>	Same timeframe as for the adoption and implementation of E&S instruments under Action 1.2 (2) above.	PIU
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging project workers and thereafter maintain and operate it throughout Project implementation.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Incorporate into the E&S instruments required for site-specific activities a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the adoption and implementation of the E&S instruments under Action 1.2 (2) above.	PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the E&S instruments to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the E&S instruments under Action 1.2 (2) above	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the site-specific E&S instruments to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of E&S instruments under Action 1.2 (2) above.	PIU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p>	Same timeframe as for the adoption and implementation of E&S instruments under Action 1.2 (2) above.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the E&S instruments to be prepared in accordance with the ESMF.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>LAND ACQUISITION and RESTRICTIONS ON LAND USE</p> <p>1. Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p> <p>2. Prepare, consult, adopt and implement Resettlement Action Plans (RAPs) in case involuntary land acquisition is envisaged for project activities in line with the RPF and ESS5.</p>	<p>1. Adopt the RPF no later than one (1) month after the Effective Date and thereafter implement the RPF throughout Project implementation.</p> <p>2. Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and (as applicable) displaced people have been resettled and moving allowances have been provided.</p>	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Not relevant as this Project will not finance activities that can adversely impact biodiversity and/or sensitive natural areas.</p>	N/A	N/A
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the site-specific ESMP/ESMP Checklist consistent with ESS8.</p>	Same timeframe as for the adoption and implementation of the ESMPs under Action 1.2 (2) above	PIU
8.2	<p>CHANCE FINDS</p> <p>Incorporate chance finds procedures consistent with ESS8 in the relevant E&S instruments (ESMF, ESMP/ESMP Checklist/CHMP).</p>	Same timeframe as for the adoption and implementation of the ESMP under Action 1.2 (2) above	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant as this Project will not finance financial intermediaries.	N/A	N/A
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>1. Update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them free of manipulation, interference, coercion, discrimination, and intimidation. Update the SEP to facilitate stakeholder engagement at the sub-project level.</p>	Update and adopt the SEP no later than one (1) month after the Effective Date and thereafter implement and update the SEP throughout Project implementation to facilitate engagement at the sub-project level.	PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM (GRM)</p> <p>Establish, publicize, maintain, and operate an accessible GRM to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The GRM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Same timeframe as for the adoption and implementation of the SEP	PIU
CAPACITY SUPPORT			
CS1	ESF training shall be provided to members of the PIU, the PIU E&S specialists, MoJPA staff, Project workers, including general ESF training and thematic training on relevant ESSs and preparation of environmental and social instruments at the site-specific level.	General ESF training shall be organized no later than one (1) month after the establishment of the PIU and thematic ESS training shall be organized during the project implementation. For project workers, this training shall be provided upon contract award of site-specific activities and prior to implementation of the site-specific activities.	PIU
CS2	Specific training shall be provided to contractor workers on monitoring and reporting under ESF, waste management, GRM, OHS and asbestos when deemed needed.	Upon contract award of site-specific activities and prior to implementation of the site-specific activity.	PIU