

Republic of Croatia

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

INTEGRATED LAND ADMINISTRATION AND JUSTICE SERVICES PROJECT

STAKEHOLDER ENGAGEMENT PLAN

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ABBREVIATIONS

CEPEJ	European Commission for the Efficiency of Justice
CO	Cadastral Office
CSO	Civil Society Organization
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GRM	Grievance Redress Mechanism
ILAS	Integrated Land Administration Systems Project
IPF	Investment Project Financing
J4B	Justice for Business Project
JIS	Joint Information System
LRO	Land Registry Offices
MoJPA	Ministry of Justice and Public Administration of the Republic of Croatia
M&E	Monitoring and Evaluation
NGO	Non governmental organization
OG	Official Gazette
OHS	Occupational Health and Safety
OSS	One Stop Shop
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SGA	State Geodetic Administration
USKOK	Office for Suppression of Corruption and Organized Crime
WB	World Bank

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1. Introduction and project description

The Government of Croatia has made steady progress in land and justice sector reforms, including with the support of the Integrated Land Administration Systems Project (ILAS) (P122219) and the Justice for Business Project (J4B) (P167247) funded by the World Bank. At its core ILAS aims to build functional land administrations systems to benefit systems by strengthening property rights, enhancing delivery of land administration services, increasing land data, and reducing costs of registration. The J4B project contributes to improving the delivery of justice services to citizens and businesses and simplification of business regulatory procedures. Despite progress in these sectors obstacles to development persist. With cadaster and land registry functions under separate entities the importance of functional integrations is of key importance for Croatia. The effectiveness of court case processing remains below EU standards set by European Commission for the Efficiency of Justice (CEPEJ) and e-services can be increased. Outdated and poorly maintained court, and cadaster and registry offices infrastructure do not adequately meet the needs of citizens and businesses, or service providers, with offices often scattered across locations.

The activities of the Integrated Land Administration and Justice Services Project (hereinafter: Project) build upon the achievements of previously funded World Bank projects aiming at the development objectives of increased digitization, institutional integration, and improved services for citizens. The proposed implementing agencies of the Project are the Ministry of Justice and Public Administration (MoJPA) and the State Geodetic Administration (SGA).

The Project Development Objective is to improve functional integration of land administration and court institutions to enhance services for citizens. In order to reach the development objective the Project will include 6 components.

Component A: Integrated Digital Land Registry and Court Services will finance activities that will support the digitization and integration of land registry court data and services. It will continue the digitization of paper and land registry and court records, making them more resilient to disaster and more easily shareable through the Joint information system (JIS) and other online systems.

Component B: Integrated Digital Services of State Registers and Geospatial will support enhanced geospatial data. Data from about two-thirds of counties in Croatia are not yet included in the infrastructure cadaster. Mapping and recording the location of infrastructure supports land use planning.

Component C: Further Digital Integration of Land Register and Cadaster includes enhancements to the JIS and One Stop Shop (OSS), such as: (i) improving data quality and maintenance; (ii) recording of real property prices; (iii) simplifying online access to land records; (iv) upgrading of mobile apps (My Properties); (v) simplifying the process of recording construction rights; (vi) further digitization of cadaster processes; and (vii) extension of JIS access to lawyers.

Component D: Integrated Court, Land registry Offices (LRO) and Cadaster offices (CO) Infrastructure will provide construction of court, registry and cadaster infrastructure to international and EU standards to support improved service delivery and establishment of a new structure for addressing appeals of land disputes. This component would support construction of new infrastructure to support integrated cadaster, land registry and court services and establish a Land Court of Appeals. This component will support construction of new infrastructure in areas possibly to include Novska, Rijeka, Bjelovar and Velika Gorica. This component will also support provision of new ICT cabling to improve digital services in thirty COs.

Component E: Institutional capacity building, policy analysis, and Project Management will support

Project Implementation Unit (PIU) operations and Monitoring and Evaluation (M&E) activities. It will also finance capacity building programs and the implementation of public awareness campaigns and customer satisfaction surveys. Capacity building programs to be financed via Component E will include topics such as (i) cadaster and land registry laws; (ii) individual reconciliation of cadaster and land registry data; (iii) land registry renewal; (iv) joint cadaster and land registry procedures; (v) use of MoJPA and SGA e-services by public and professional users; and (vi) management training.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

1.1. Digitalization and integration of Land Registry and Court Services, and institutional capacity building (Component A, B, C, E)

Component A, B, C include activities that will support the digitization and integration of land registry court data and services, improvement of digital services of cadastre and geospatial data and further digital integration of land registry and cadastre. Component E refers to capacity building, policy analysis, and project management.

The above-mentioned components include sub activities such as digitization of paper and land registry and court records, improvement of geospatial data, of the infrastructure cadastre, performing surveys and enhancement of the JIS and OSS as well as capacity building programs and public awareness campaigns. New cadastral surveys and land register establishment/renewal will be conducted to improve accuracy and corrections to cadastre and land registry records, which will provide citizens and landowners with clearer land rights.

These project activities will take place nationwide and, at the moment of project appraisal, exact locations of cadastral surveys are not known.

1.2. Infrastructure Integration of Land registry and Cadastre (Component D)

The component D of the project will support the construction of integrated infrastructure for courts, land administration offices and cadaster offices with the aim to support improved and integrated service delivery. Also, under Component D. small scale works for the improvement of 30 cadaster office's locations will be implemented. The works are of limited nature and will consist mainly in the improvement of technical installations (electrical wirings, internet cables and similar small interventions). The new infrastructure will be designed and built in line with international and EU standards and will be in Novska, Rijeka, Velika Gorica and Bjelovar.

1.3. Integrated infrastructure in Velika Gorica

Currently the Municipal and County Court including land registry offices and the Cadaster Department in Velika Gorica are scattered across several locations in the city. Most premises are in the very center of the City of Velika Gorica, are in lease but still inadequate both in terms of quality and quantity of space. The judicial bodies being relocated include Municipal and County Courts in Velika Gorica, County and Municipal State Attorney's Offices in Velika Gorica, and Real Property Cadaster Department Velika Gorica. Working conditions for employees and court users are not in line with judicial best practice and international standards (e.g., there is one single entrance for all users, including employees and litigants). It is important to stress that some of the Courts (County Court, Municipal Court) have jurisdiction on cases of underage children and youth but are not equipped to hold remote trials, which is required by national law for juvenile cases. Furthermore, adequate access for persons with disabilities is not adequately ensured. At this stage of project appraisal, the location of the planned new court and land administration building is yet not known.

1.4. Integrated infrastructure in the City of Rijeka

The Municipal Court in Rijeka is faced with significant challenges in its daily operation and organization of judicial activities, being scattered across seven different facilities in Rijeka. Currently, the court archives are in two private apartments on the lease, and the Misdemeanor Court and the Land Registry are in separate locations. In addition, the Family Court is planned to be opened soon, and it will also be located outside the main courthouse. Similar challenges are faced also by other judicial bodies located in the city. More precisely it has been detected that new infrastructure is needed to host the Municipal Court including Land registry offices, Commercial Court, Administrative Court, Centre for Mediation, Municipal State Attorney's Office, County State Attorney's Office, USKOK (Office for Suppression of Corruption and Organized Crime) and Regional Cadaster Office.

At this stage of project appraisal, the exact location of the planned new integrated infrastructure is yet not known. A possible area could be within around publicly owned 42 ha for which the City of Rijeka is developing a new Urban plan. Public consultations for new urban plan are planned by the end of 2023. Generally, in certain parts of the 42 ha the City of Rijeka leases the land to citizens for their city gardens and agricultural and leisure purposes. The city has signed the land lease agreement with each user and for the price of about EUR 0.30/m². In line with contract provisions, the City of Rijeka can terminate the Contract, among other things, due to the repurposing of the space, whereby users of the gardens must move out and leave the space restored to its original state within 15 days from the notification. More precise data on the total area under lease, number of persons and /or entities that have signed the contract, the number and surface of gardens or other information on the use of the land have been requested and will be included within the Project's Social Assessment. It is possible that the new development plan could cause some discontent/social risks to the overall project/social context. Once the exact location of the new judiciary and cadaster integrated infrastructure will be known, if it will be within the area under the new Urban plan, current users of land should be consulted through the sub-project SEP, and any risks and impacts will be addressed through tools and solutions foreseen within the Project's Environmental and Social Management Framework, and/or, if deemed necessary, through an abbreviated Resettlement Action Plan (RAP).

1.5. Integrated infrastructure in Novska

Novska is a smaller regional center in Sisak-Moslavina County to which residents of neighboring municipalities also gravitate, using higher-order functions such as the judiciary, cadaster, and land registry. Novska has a court Permanent Service that is part of the Municipal Court in Kutina. It currently uses city spaces that are incompatible with modern standards and technological requirements. The cadaster and land registry are temporarily located in the nearby city administration building. There is a noticeable lack of space for judges, employees of all services and for users. The way of connecting with users and communication within individual bodies are not appropriate, which slows down the work process, creates a poor working environment and reduces user satisfaction. The construction of the new judicial building of the Municipal Court Kutina-Permanent Service Novska and the accommodation of the Cadaster office and the Land Registry Department are envisaged to functionally connect them and implement guidelines of new standards in judicial infrastructure. The location planned for the new court building is in Potočka street no. 10 in the center of Novska. Construction is planned on building land kč.br. 1030, k.o. Novska area of 2,277 m² owned by the Republic of Croatia, pursuant to the Agreement on financing works for the construction of an office building for the purpose of accommodating judicial authorities and offices of the State Geodetic Administration. Project design services for the design of the new integrated infrastructure must be contracted. The location was once used as a city market and a shop with household goods. With the construction of the new market, the need to use this space for this purpose disappeared. The space in which the store used to be used by the City Red Cross Society as an occasional warehouse when receiving and distributing goods to users. Other premises are used by the Association for Breeding Small Animals Novska and the Club of Pigeon Breeders Novska for

occasional exhibitions and competitions. Users do not have a contract on the use of space. During the project preparation phase representatives of the current space users have been contacted to inform them on the plans for the site, the fact that they will be asked to leave the spaces they are currently using and to collect their opinion, worries and eventual needs arising from their relocation. They confirmed their support to the project and the support that was provided by the town authorities in finding alternative spaces for their activities.

1.6. Integrated infrastructure in Bjelovar

The new infrastructure will host the Commercial Court, the County, and the Municipal State Attorney's Offices. It is planned on the same plot of land where the existing building of the judicial bodies of the city of Bjelovar is located, next to the existing building, at the address Ivša Lebovića, Bjelovar. The parcel in question is fully owned by the Republic of Croatia, i.e. the Ministry of Justice and public Administration. In the new infrastructure the Commercial Court will be located on the upper ground floor of the building and on the first floor, while the Municipal State Attorney's Office and the County State Attorney's Office will be located on the second and third floors. By moving to the new infrastructure, the current space of the Commercial Court, which is located in the neighboring building, will be returned to the City of Bjelovar and additional space will be freed up in the existing building. The space that will be freed up will be used for the expansion of the judicial bodies that remain in the old building, namely the Municipal Court and the County Court, but also for the return of the Misdemeanor department and of the land registry office from the currently leased space in other parts of the town. All of the above will provide all these bodies with significantly better working conditions and thus functioning. The organization of the new layout of the plot will enable an additional rear entrance for employees to the existing building, as well as the definition of a prohibited area for the public in front of the prison building.

1.7. Improvement of 30 cadastre office locations (cabling)

Small scale refurbishing works are foreseen in 30 chosen cadaster offices across Croatia. The works are of limited nature and will consist mainly in the improvement of technical installations (electrical wirings, Internet cables and similar small interventions).

2. Legal and institutional framework

2.1. Organization of judicial system in Croatia

The Constitution of the Republic of Croatia provides that authority is organized according to the principle of tripartite separation of powers, so that legislative authority is exercised by the Croatian Parliament, executive authority by the Government and judicial authority by the courts. Judicial office is held by judges appointed by the State Judicial Council. The judicial system of the Republic of Croatia consists of the judiciary (courts), autonomous and independent judicial bodies (public prosecutor's offices), the executive (Ministry of Justice and Public Administration), autonomous and independent bodies (State Judicial Council and Council of Public Prosecutors), an autonomous and independent service (legal profession), an autonomous and independent public service (notaries) and a public institution (Judicial Academy).

The task of MoJPA is to preserve the fundamental values of the legal order, to ensure the conditions for its sound functioning and to further develop the judicial system.

The Courts Act (OG 28/13, 33/15, 82/15, 82/16, 67/18, 126/19, 130/20, 21/22, 60/22, 16/23) regulates the organization, remit and jurisdiction of the courts. In the Republic of Croatia, judicial authority is exercised by the courts as separate bodies of state authority. Judicial authority in the Republic of Croatia is administered by the ordinary and specialized courts, and the Supreme Court of the Republic of Croatia, which is also the highest court in the Republic of Croatia. Ordinary courts are courts which deal with matters over which no specialized court has jurisdiction. These are the municipal courts and county courts. Specialized courts are courts which deal with matters over which

the law has given them jurisdiction. They are commercial courts, administrative courts, misdemeanor courts, the High Commercial Court of the Republic of Croatia, the High Administrative Court of the Republic of Croatia and the High Misdemeanor Court of the Republic of Croatia.

The courts are further divided into courts of first and second instance. Proceedings to settle a legal matter are brought before the courts of first instance. These are the municipal, administrative, misdemeanor and commercial courts. The courts of second instance take decisions on appeal against decisions of courts of first instance and carry out other tasks laid down by law. These are the county courts (in relation to municipal courts), the High Commercial Court of the Republic of Croatia (in relation to commercial courts), the High Misdemeanor Court of the Republic of Croatia (in relation to misdemeanor courts) and the High Administrative Court of the Republic of Croatia (in relation to administrative courts). Municipal and misdemeanor courts are established for the territory of one or more municipalities, one or more towns or parts of an urban area, whereas the county, commercial and administrative courts are established for the territory of one or more counties. The High Commercial Court of the Republic of Croatia, the High Administrative Court of the Republic of Croatia, the High Misdemeanor Court of the Republic of Croatia, and the Supreme Court of the Republic of Croatia are established for the territory of the Republic of Croatia.

The Public Prosecutor's Office is an autonomous and independent judicial body that is authorized and obliged to act against perpetrators of crimes and other punishable offences, to take legal action to protect the assets of the Republic of Croatia and to submit legal remedies to protect the Constitution of the Republic of Croatia and the legislation. The Public Prosecutor's Office of the Republic of Croatia has been established to cover the entire territory of the Republic of Croatia; municipal public prosecutor's offices have been set up to deal with municipal courts and public law bodies; and county public prosecutor's offices have been set up to deal with county, commercial and administrative courts. Municipal public prosecutor's offices are subordinate to the county public prosecutor's offices; the county public prosecutor's offices and dedicated public prosecutor's offices are subordinate to the Public Prosecutor's Office of the Republic of Croatia.

The Prosecutor-General of the Republic of Croatia is head of the Public Prosecutor's Office of the Republic of Croatia. The Territories and Registered Offices of Public Prosecutor's Offices Act (OG 67/18, 21/22) streamlined the network of public prosecutor's offices, creating 15 county public prosecutor's offices and 25 municipal public prosecutor's offices. The Zagreb-based Office for the Prevention of Corruption and Organized Crime is a dedicated public prosecutor's office specializing in the prosecution of corruption and organized crime, which covers the entire territory of the Republic of Croatia.

2.2. Land administration system

The land administration system is composed of several key institutions and sectors with respective legal frameworks of which the most important ones are:

- The Ministry of Justice and public administration oversees and develops land administration policies and land-related laws and regulations. The Land Registration Management Sector within the MoJPA is a special unit responsible for managing the Land Registry Offices which are subordinate to the municipal courts.
- The State Geodetic Administration: is the central authority responsible for geodetic and cartographic activities that manages the cadaster, the national geodetic reference systems, and topographic mapping. It also ensures the accuracy, integrity, and availability of land-related spatial data. The SDA performs tasks within its scope in the Central Office in Zagreb and in 20 regional cadaster offices. Regional offices carry out tasks within their competence in departments (95) and branches (36) in accordance with the Law on State Survey and Real Estate Cadaster ("Official Gazette" No. 112/18, 39/22). Cadastral offices provide different types of

services to citizens including issuance of copies of the cadastral plan, issuance of transcripts/excerpts of title deeds, Issuance of extracts from the Land Data Base, Issuance of various certificates and certificates based on the registered cadastral data. In addition to the above, cadastral offices review and confirm geodetic reports prepared for citizens by natural or legal persons who have the consent of the State Geodetic Administration to perform professional geodetic work. Procedures conducted in cadastral offices are prescribed by the Act on State Survey and Real Estate Cadaster (OG 112/18, 30/22)

- Courts: Land registers are public registers in which data on the legal status of real estate relevant for legal transactions are entered. Land registers are kept in the land register departments of municipal courts.

2.3. Right to access information

The Act on the Right of Access to Information (OG 25/13, 85/15, 69/22) regulates the right to access information and the reuse of information held by public authorities. This Act, among other, defines the principles of the right to access and re-use of the information, restrictions on the right to access information, procedure for exercising and protecting the right to access information on, scope. The right of access to information is founded on the principles of public and free access, timely, complete and accurate information, the principle of equality, the principle of the availability of information and, pursuant to Article 5, paragraph 1, point 5 of the Act, this right "*entails the right of a user to request and receive the information, as well as the obligation of the public authorities to provide access to the information requested, that is, to publish the information even when no particular request has been made, when publication stems from their obligation prescribed by law or some other general regulation*"¹.

Aarhus Convention

Croatia is party to the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters done at Aarhus, Denmark, on 25 June 1998, which is based on three pillars:

- **The right to information:** citizens have the right to access environmental information held by public authorities upon request;
- **The right to participate** in decision-making during the preparation of plans, programs, policies and legislation relating to the environment; and
- **The right to justice:** citizens have the right to access justice regarding environmental matters; to challenge a refusal or inadequate response to request for information; and to challenge the legality of a plan or challenge actions or omissions that contravene national environmental law.

Any member of the public has the right to submit communications to the Aarhus Convention Compliance Committee concerning alleged non-compliance of a party with the Convention.

General Data Protection Regulation (GDPR)

Croatia ensured implementation of EU Regulation (EU) 2016/679 through adoption of the Act on the Implementation of the General Regulation on Data Protection (OG 42/2018), which is adopted in May 2018 and requires organizations to safeguard personal data of natural persons (individuals) and to uphold the privacy rights of natural persons in the EU territory.

The GDPR includes seven principles of data protection that must be implemented and eight privacy rights that must be facilitated. It also empowers member state-level data protection authorities to enforce the GDPR with sanctions and fines. The authorities can levy harsh fines against those who

¹ <https://vlada.gov.hr/access-to-information/15017>

violate privacy and security standards prescribed by GDPR, with penalties reaching into the tens of millions of euros. A Data Protection Officer, as an employee within an organization, is responsible to inform and advise the organization and with monitoring of organizations compliance with the GDPR.

All projects subject to the screening process and environmental impacts assessment, as regulated by environmental protection legislation, must undergo a public consultation process. Also, in line with Act on the Regulatory Assessment (OG 44/17) consultation with the interested public in the process of adopting new regulations is obligatory as well as assessment of their potential benefits and costs on citizens of the Croatia.

Additionally, the Act on the Regulatory Assessment (OG 44/17) stipulates consultations with the interested public in the process of adopting new regulations as well as assessment of their potential benefits and costs on citizens of Croatia. The consultations of new legislation is conducted via Government central web portal e-Consultations: <https://esavjetovanja.gov.hr/ECon/Dashboard>

3. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

3.1. Environmental risk and impact

The impact on the environment is expected from the execution of civil works through the implementation of the component D: Integrated Court, LROs and COs Infrastructure. This component will support construction of infrastructure in areas possibly to include Novska, Rijeka, Bjelovar and Velika Gorica. This component will also support provision of new ICT cabling to improve digital services in thirty COs.

Expected environmental impacts under Component D are typical for the civil works and they include: Air pollution - emission of dust due to excavation and construction/reconstruction; Emission of noise – due to excavation and construction/reconstruction; Surface or ground water pollution (including accidental spillage of machine oil, lubricants); Soil pollution and/or erosion; Generation and management of wastes (municipal waste, small quantities of construction and hazardous waste e.g. asbestos); Traffic disturbance; Cultural and historical heritage (chance finds and impact on protected cultural and historical entity); Impact to nature - no impact to biodiversity under construction activities. The potential risks and impacts under this Project can be characterized as predictable, temporary and predominantly reversible; low to moderate in magnitude; site-specific and have low probability of serious adverse effects to human health and/or the environment, easily mitigated and managed. Environmental impacts under other components are not expected as they are aimed to support the digitization and integration of land registry court data and services; enhanced geospatial data; enhancements to the JIS and OSS. Possible impacts identified for civil works can be easily removed or mitigated by applying of good construction practice and proper organization of the construction site.

3.2. Social risks and impacts

Social risks identified for Component A, B and C include barriers to access for land justice services faced by certain vulnerable groups. Those barriers could be further exacerbated by moving to digital delivery (especially for the elderly or other populations with reduced digital skills). Further social risk might relate to the implicated potential disputes during cadastral survey and land registration activities (Component C) is non-existent. The cadaster surveys provides free public procedure for settlement of any previous dispute and uncertainty, it also improves legal certainty of land ownership. Other eventual claims on properties due to restitution from the Yugoslav era, family disputes, inheritance and any other issues of land registration are separate procedures available to the citizens. Eventual other social risks arising from the cadastral surveys is avoided, minimized, and reduced by tools already established by relevant national legislation pertaining to this activity, such as the act on the Law on State Survey and Real Estate Cadaster and the bylaws deriving from it.

Naturally, the activities will also be mitigated through WB and Project specific tools such as the GRM and the project Stakeholder engagement plan.

Most of the social risks are identified for the Component D consisting the in the construction of new integrated court, land registry and COs infrastructure. These are as follows:

Community health and safety

Community health and safety risks are typical for construction works:

- Increased noise and vibrations caused by increased traffic, use of machinery and equipment at the construction site.
- Traffic accidents for pedestrians caused by increased and inadequately organized traffic (transportation of materials, equipment and workers);
- Temporary closing of roads without ensuring adequate transport routs may cause inconvenience for local population.
- Disruptions in utility services due to accidents or planned interventions (water, gas, electricity).
- Poor occupational health and safety practices
- Inadequate disposal of waste from construction site polluting the community environment (including inadequate management of asbestos waste and exposure of local community with asbestos – if proved to be presence of asbestos on any of the sites).

In addition, potential community risks related to foreign labor influx are present. Although contractors and workers employed in construction activities are likely to be locally based, there is a potential of labor influx and contractor may engage foreign workers (local from outside the sub-project area or foreigners). In Croatia the number of foreign workers is increasing, especially in construction sector. The majority of workers still come from the countries in region with similar cultural patterns and for which language does not pose barrier and thus can easily integrate in community (e.g., Serbia, Bosnia Herzegovina). However, the number of foreign workers from distant countries (e.g., Nepal, India, Filipins, Bangladesh, etc.) which have a different culture and language, is significantly raising. Potential risks and impact on community related to foreign workers due to difficulty of their integration into community are present (e.g., the feelings of anxiety and fear for unsafe environment among the residents when there are foreign workers living in the same building or in vicinity). For planned infrastructure activities Component D, the number of foreign workers and related potential risks will probably be of small scale. For sub-project planned in City of Rijeka the number of foreign workers and the scale of potential impact can be higher although not directly caused only by project activity. Given that the City of Rijeka is planning the development of a new urban zone, apart from the construction of a courthouse in the new urban zone, the implementation of other infrastructural projects will most likely take place and possible in parallel with court construction (financed from other sources). This may cause a greater labor influx and concentration of foreign workers in the community which can lead to higher number of complaints from local community.

Labor management risks

This Project will most likely include all categories of project workers defined by ESS2, except community workers (direct workers, contracted workers, and primary supply workers). For infrastructure activities beside direct workers (persons employed or engaged directly by the MoJPA such as social, and environmental experts, architects, civil engineer, procurement, financial management employed within the PIU, etc.) both low- and high-quality skilled workers, are expected to be engaged by contractors and sub-contractors (construction company, supervision company, and company performing project management). Beside the OHS risks potential labor risks in relation to civil works are related to working conditions and treatment of the project workers (e.g., employment and working conditions, membership and participation in workers' or employers' associations or in any other professional organization, etc.). It can be expected that the greater number of low skill

workers will be engaged, including the foreign workers as previously described. Foreign workers can be seen as a vulnerable group due to their non-existent social networks, obstacles in exercising all social rights, and higher general exposure to potential discrimination.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

With respect to GBV, the risk is low as there will only be small to medium size civil works.

Lack of communication and information exchange

There are potential risks of poor or a lack of communication and information exchange among relevant stakeholders including local community. For all civil works continuous stakeholder engagement through all project cycle should be ensured as well as easily accessible GRM mechanisms, both for public and project workers. In this sense special attention should be given for sub-project located in City of Rijeka and Velika Gorica as exact locations of the new infrastructure are not known. As a possible location of the new infrastructure in Rijeka is the new urban zone that is being planned by the city, there is a possibility of citizens resistance to changing the Cities landscape. In line with relevant acts on urban planning the City of Rijeka is obliged and with conduct public consultations on the new Urban plan by the end of 2023. PIU representatives (at least the social specialist) will be present during these consultations to collect the first public feedback. Due to other social risks identified (especially as the risks related to land acquisition, restriction on land use and involuntary resettlement that cannot be excluded for Rijeka and Nova Gorica) meaningful consultation and stakeholder engagement shall be conducted during the whole life-cycle of the of the subprojects.

Risks related to land acquisition, restrictions on land use and involuntary resettlement.

For two projects sites (Rijeka, Velika Gorica) risks related to land acquisition, restrictions on land use and involuntary resettlement as defined by WB ESS5 cannot be excluded because exact locations of future courts are not defined yet. During the choice of the exact location a mitigation hierarchy approach will be adopted by anticipating and avoiding risks and impacts (including while choosing / determining the exact location). Where avoidance will not be possible the risks will be minimized or reduced and then mitigated. Regarding the Location in Novska the risk related to land acquisition, restrictions on land use and involuntary resettlement as defined by WB ESS5 is not high as the current users of the space are familiar with the plans for the location and currently do not oppose it.

Most social risks identified for Component D are typical for construction works. The civil works to be performed are small to medium in magnitude and as such the impacts can be easily and predictably avoided, minimized and mitigated by proper organization of construction site, continuous communication with all stakeholders and through other ESF tools and national legislation, in particular through the development and implementation of project and sub-project stakeholder engagement plans and grievance redress mechanisms as well as through the development and implementation of labor management procedures. Further tools foreseen in EES4 will be developed as needed given that the exact location of planed infrastructure investment in Rijeka and Velika Gorica are not known.

4. OBJECTIVES OF STAKEHOLDER ENGAGEMENT PLAN

The SEP defines a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the Project team, including the Project Implementation Unit (PIU) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the Project and any activities related to the Project.

The key objectives of the SEP can be summarized as follows:

- Build ownership over the project outcomes among key stakeholders to promote collaboration, enhance probability of successful outcomes through ensuring key stakeholder participation.
- Start early in the project planning process in order for the initial feedback to be gathered from the participants and to enable modifications in the project design, as needed.
- Avoid, minimize, or reduce social risks that can negatively affect and/or jeopardize improvement of and functional integration of cadaster, land administration and other judiciary institutions through proactively identifying risks and concerns with stakeholders and preventing or mitigating these risks through transparent and agile communication channels.
- Provide guidance for stakeholder engagement.
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities.
- Identify the most effective methods, timing, and structures through which to share project information, and to ensure regular, accessible, transparent, and appropriate consultation.
- Develop a stakeholders engagement process that provides stakeholders with an opportunity to influence project planning, design, and implementation by generating structured channels for ongoing feedback from all project beneficiaries and partners.
- Establish formal grievance/resolution mechanisms.
- Define roles and responsibilities for the implementation of the SEP.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

Meaningful stakeholder engagement under this SEP is based on the following principles:

- Recognition that stakeholders are critical partners in project design and implementation and not just “beneficiaries”.
- Communication is based on a two-way flow that goes beyond a “public relation” or information dissemination campaigns (one-way flow)
- Adoption of transparent, agile, and accessible means for informed participation by diverse stakeholders with varying means and capacities
- Is based on a structured process (instead of a sole event), allowing for stakeholders to become informed, process and analyze information, provide feedback, and receive reports back on whether and how their feedback was considered.

5. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Summary of stakeholder engagement activities (Pre-appraisal and negotiation phase)

Pre-appraisal phase

- Stakeholders	Issues discussed	Methods for Engagement
<ul style="list-style-type: none"> - MoJPA staff - SGA staff 	<ul style="list-style-type: none"> - Consultations on problems and obstacles for further improvement and integration of cadaster, land registry and other court services - Consultation on potential solutions and activities to be included in the Project. - Consultations on the objectives and scope of the project, draft description of activities, definition of budget and project indicators - Identification on current and future needs related of SGA and MoJPA staff, staff of judiciary bodies and of 	<ul style="list-style-type: none"> - Meetings (physical and virtual) - Presentations - Phone and e-mail communication

	<p>other training stakeholders.</p> <ul style="list-style-type: none"> - Identification of subproject locations, definition of needs, problems and identification of possible solutions - Identification of potential training activities 	
<ul style="list-style-type: none"> - Management staff of cadaster branch office - Management staff of land registry and courts 	<ul style="list-style-type: none"> - Consultations on problems of current infrastructure (buildings) as well as on infrastructural needs for improvement and integration of cadaster, land registry and other court services - Consultation on the extent of the new integrated infrastructure in terms of content, presentation of WB requirements, including of ESF and related Standards 	<ul style="list-style-type: none"> - Meetings (physical and virtual) - Presentations - Phone and e-mail communication
<ul style="list-style-type: none"> - Local self-government units (municipality level) 	<ul style="list-style-type: none"> - Consultation on the extent of the new integrated infrastructure in terms of content, presentation of WB requirements, including of ESF and related Standards. - Identification and consultation on possible land plots for the new infrastructure, definition of status, problems and opportunities 	<ul style="list-style-type: none"> - Meetings (physical and virtual) - Presentations - Phone and e-mail communication
<ul style="list-style-type: none"> - Current users of land / plots where new infrastructure will be located (Novska) 	<ul style="list-style-type: none"> - Presentation of project and related activities - Presentation of tools deriving from ESF - Presentation of plans for future infrastructure, needs, timeline for relocation and support provided to find alternative location - Collection of needs, worries, opinions 	<ul style="list-style-type: none"> - Meetings (physical and virtual) - Presentations - Phone and e-mail communication

5.2. Summary of stakeholder engagement activities (Negotiation phase)

- Stakeholders	Issues discussed	Methods for Engagement
<ul style="list-style-type: none"> - CSO organizations representing plaintiffs and defendants and other vulnerable 	<ul style="list-style-type: none"> - Consultations on problems and obstacles for presentation of project and related activities - Presentation of project risks 	<ul style="list-style-type: none"> - Meetings (physical and virtual) - Presentations

justice system users (i.e. NGOs dealing with protection of victims and witnesses, gender equality, rights of minorities, elderly persons, persons with disabilities) - Chamber of notaries, bar associations, Chamber of geodetic engineers	- Presentation of tools deriving from ESF - Presentation of plans for future infrastructure, needs, timeline for relocation of current land users and support provided to find alternative location - Collection of needs, worries, opinions	
- MoJPA staff - SGA staff - Representatives of other national authorities (i.e. Ministry of finance)	- Final definition of the scope of the project, description of activities, definition of budget and project indicators, financial agreements on the project	- Meetings (physical and virtual) - Presentations - Phone and e-mail communication

6. STAKEHOLDER IDENTIFICATION AND ANALYSIS

With support from the World Bank (WB), the MoJPA and SGA have prepared this SEP and will implement it to ensure that stakeholder engagement is conducted based on timely, relevant, understandable, and accessible information. The implementing agencies supported by PIU will ensure that both the format and location of the consultations are inclusive and accessible.

The SEP includes a Grievance Redress Mechanism (GRM) which will allow all stakeholders working on the project to review and provide their views and raise any potential concerns.

The first step in the SEP is to identify the key stakeholders to be consulted and involved.

For the purposes of effective and tailored engagement, project stakeholders can be divided into the following core categories:

- **Project Affected Parties (PAP)** – persons, groups and other entities within the project area of influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

6.1. Stakeholders of component A, B, C, E

Project Affected Parties	Other Interested Parties	Vulnerable groups
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<ul style="list-style-type: none"> - Local and regional self-government units (municipalities and counties) - General public / citizens (owners and users of land and buildings), - CSO organizations representing plaintiffs and defendants and other vulnerable justice system users (i.e. NGOs dealing with gender equality, rights of minorities, elderly persons, persons with disabilities) - Chamber of notaries and notaries, Lawyers and bar associations, chamber of geodetic engineers 	<ul style="list-style-type: none"> - National and local media channels <p>Internal stakeholders:</p> <ul style="list-style-type: none"> - MoJPA - SGA and its local branches - Court Management staff and staff - land administration departments - Geodetic firms - IT firms 	<ul style="list-style-type: none"> - Persons with disabilities - Women - Low-income persons - Minorities - Elderly and persons with limited access to digital technologies - Persons with no title (Persons occupying land without formal rights to title or use).
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6.2. Stakeholders of component D

Project Affected Parties	Other Interested Parties	Vulnerable groups
<ul style="list-style-type: none"> - Management staff of cadaster branch offices located in new integrated infrastructure. - Staff of cadaster branch offices located in new integrated infrastructure. - Management staff of judicial bodies located in new integrated infrastructure (court presidents, state attorneys) - Staff of judicial bodies located in new integrated infrastructure (judges, court advisors, land registry personnel, clerks, secretaries, technical and maintenance staff, cleaning staff, deputies of state attorney offices) - Staff of judiciary police protecting new integrated infrastructure. - Lawyers and bar association, - Vulnerable groups and CSO organizations representing plaintiffs and defendants and other vulnerable justice and cadaster system users (i.e. NGOs dealing with protection of victims and 	<ul style="list-style-type: none"> - Representatives of local self-government units (mayors of towns and cities of selected locations, towns, and city council members) - Ministry of Culture and Media (cultural heritage bodies) issuing permits and special conditions for specific construction requirements. - National and local media channels covering the area under the jurisdiction of courts and cadaster branch offices located in new integrated infrastructure. <p>The following internal</p>	<ul style="list-style-type: none"> - Victims and witnesses - Persons with disabilities - Women - Children and minors - Low-income persons - Minorities - Elderly and persons with limited access to digital technologies - Persons with no title - Foreign workers

witnesses, gender equality, rights of minorities, elderly persons, persons with disabilities) <ul style="list-style-type: none"> - Inhabitants of neighboring buildings who may be impacted by the construction works (e.g., dust, noise, traffic disturbances). - Owners and/or users of land where new integrated infrastructure will be located (if applicable) - General public 	stakeholders can also be included in the category of “other interested parties”: <ul style="list-style-type: none"> - MoJPA - SGA - PIU - Parties involved in construction activities: Contractors, OHS specialist, Supervision engineer, Designer, Design auditor. 	
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6.3. Vulnerable Groups

During the risk assessment the following vulnerable groups were identified:

- Victims and witnesses with a focus on victims and witnesses that are women, children and minors, low-income persons, minorities.
- Persons with disabilities
- Women
- Low-income persons
- Minorities
- Elderly, persons with limited access to digital technologies
- Persons with no title
- Foreign workers

The following table shows the likely impact that project activities will have on the vulnerable groups while the topics and frequency of engagement is described in following paragraphs.

Group	Impacts
<ul style="list-style-type: none"> - Persons with disabilities 	<ul style="list-style-type: none"> - Digitalization with enhancement of JIS and OSS website accessibility for visually impaired and persons with dyslexia in line with what is already in implementation. - New cadastral surveys and land register establishment/renewal increase legal certainty with no costs and horizontally without discrimination - Integrated infrastructure designed in line international standards of service and relevant national legislation ensuring unimpeded access, movement, residence, and work for persons with disabilities and reduced mobility.
<ul style="list-style-type: none"> - Women 	<ul style="list-style-type: none"> - Social services and courts are “power users” of the Real Property Registration and JIS as they can access information on all registered assets of a person through his/her personal data (in case of divorces, inheritance etc.) - Digitalization of land and court records allow saving time and potential losing of earning due to absence from work, speeding up the property division process during, reducing the risk of economic poverty and enhancing economic independence and inclusion. - Integrated infrastructure designed in line international standards of service including through separate circulation where feasible and waiting

	<p>areas for victims, witnesses, and court personnel as well as inclusive design focused on gender aspects, security and safety standards and procedures for both internal and exterior areas and the use of safety related equipment as necessary.</p>
- Low-income persons	<ul style="list-style-type: none"> - Harmonization of parcels of the land surface and cadastral parcels improves legal certainty of land ownership, increases the value of the land, is free for all residents. - Integrated infrastructure with improved working conditions of the CSOs of the "Network of support and cooperation for victims and witnesses of criminal acts" or created prerequisites for the establishment / improvement of departments for supporting victims and witnesses at county courts
- Minorities	<ul style="list-style-type: none"> - Cadaster survey in locations with Roma population increase legal certainty of land use and, if possible, legalization of ownership with positive effects related to housing, use of space, respect for spatial order, increase in issuance of necessary permits (diminishing illegal construction) - Cadaster survey in locations with other minorities do not have identified negative impacts (solutions exist to contact members of minorities that are not residents in Croatia) - Integrated infrastructure with improved working conditions of the CSOs of the "Network of support and cooperation for victims and witnesses of criminal acts" or created prerequisites for the establishment / improvement of departments for supporting victims and witnesses at county courts
- Elderly, persons with limited access to digital technologies	<ul style="list-style-type: none"> - Digitalization of services, primarily land registry and cadaster could hinder access to those justices for persons da do not have access do digital technologies. - The new integrated infrastructure includes physical information points and tools where persons that do not have access do digital technologies will be able to obtain information, documentation, and guidance.
- Persons with no title	<ul style="list-style-type: none"> - Harmonization of parcels of the land surface and cadastral parcels significantly improves legal certainty, increases the value of the land, including for persons with no title (i.e. Roma population) - Within component D related to construction of new infrastructure (for Rijeka and Velika Gorica where locations are not known), risks related to land acquisition, restrictions on land use and involuntary resettlement can not be excluded. The groups shall be protected through WBs ESF requirements, particularly ESS5 (RPF, RAPs) and project and subproject SEPs and GRMs.
- Victims and witnesses	<ul style="list-style-type: none"> - Integrated infrastructure designed in line international standards of service including through best solutions for user access and public spaces through separate circulation where feasible and waiting areas for victims, witnesses, and court personnel; inclusive design focused on gender aspects, security and safety standards and procedures for both internal and exterior areas and the use of safety related equipment as necessary.

	- Improved working conditions of the civil society organizations included in the "Network of support and cooperation for victims and witnesses of criminal acts" or created prerequisites for the establishment of departments for supporting victims and witnesses at county courts.
- Foreign workers	- The project will develop Labor management procedures in line with the requirements of EES2. Provisions of project LBM will include, among others, requirement, for the Contractor to prepare and enforce a Code of Conduct for Workers, a functional Worker GRM and Project GRM.

6.4. Relevant stakeholder group: stake and nature of interest

Stakes and nature of interest of relevant stakeholders' group is as follows:

Stakeholder	Stake/nature of interest in the project	Interest	Influence
Project-affected parties			
- Local and regional self-government units (municipalities and counties)	<ul style="list-style-type: none"> - Harmonized data land surface, cadastral parcels and land registry improve legal certainty of land ownership and thus increases the value of the land, free for all residents of the area under survey with positive impacts for persons with low income. - Higher quality/modern and integrated infrastructure with improved service delivery to citizens. - Enhanced of attractiveness potentially contributing to positive economic and/or demographic trends. 	High	Medium
- General public / citizens (citizens under jurisdiction of bodies located in new infrastructure, owners and users of land and buildings for component (A, B, C and D))	<ul style="list-style-type: none"> - Improved quality and efficiency of service through integrated digital services of official registries and spatial data, digitized court records, and digital integration of land registry and cadaster - Harmonized data land surface, cadastral parcels and land registry improve legal certainty of land ownership and thus increases the value of the land, free for all residents of the area under survey with positive impacts for persons with low income. - Greater efficiency and modernized integrated infrastructures provide improved services, comfort and better accessibility. 	High	Medium
<ul style="list-style-type: none"> - Chamber of notaries and notaries - Lawyers and bar 	- Improved quality and efficiency of service through integrated digital services of official registries and spatial data, digitized court records, and digital integration of land	Medium	Medium

associations	<p>registry and cadaster</p> <ul style="list-style-type: none"> - Increased workload and work opportunities (notaries) as integral part of Cadaster survey processes 		
<ul style="list-style-type: none"> - Management staff and staff of cadaster offices located in new integrated infrastructure. - Management staff and staff of judicial bodies located in new integrated infrastructure. - Staff of judiciary police 	<ul style="list-style-type: none"> - Manage a higher quality/modern cadaster office / court with improved and integrated infrastructure. - Satisfied staff due to the enhanced working environment. - Improvement in quality and efficiency of service delivery. - Opportunity to influence and contribute to infrastructural design improvement; Improvement of safety and security measures Improved quality and efficiency of service through integrated digital services 	High	High
<ul style="list-style-type: none"> - Chamber of notaries and notaries, lawyers and bar associations, chamber of geodetic engineers 	<ul style="list-style-type: none"> - Greater efficiency and modernized integrated infrastructures provide improved services, comfort and better accessibility. Improved quality and efficiency of service through integrated digital services of official registries and spatial data, digitized court records, and digital integration of land registry and cadaster 	High	High
<ul style="list-style-type: none"> - Inhabitants of neighboring buildings 	<ul style="list-style-type: none"> - Enhanced attractiveness of the neighborhood due to new integrated infrastructure 	Medium	Medium
<ul style="list-style-type: none"> - Owners and/or users of land where new integrated infrastructure will be located (if applicable). 	<ul style="list-style-type: none"> - Rights of owners and/or users protected through implementation of tools foreseen in ESF such as RPF and RAPs, Project, and Subproject GRM and SEP 	High	High
<ul style="list-style-type: none"> - CSO organizations representing plaintiffs and defendants and other vulnerable justice and cadaster system 	<ul style="list-style-type: none"> - Design of the new integrated infrastructure in line with international standards - Digital services in line with principles of accessibility for visually impaired - improved spaces for CSOs and departments supporting victims and witnesses, low income persons. 		

users	- Improved legal certainty of land ownership, and of the value of land under survey that is free for citizens		
Other interested parties			
- National and local media channels	- Provided timely information to national and local population on: <ul style="list-style-type: none"> o Improved quality and efficiency of service through integrated digital services o New infrastructure Implementation of cadaster survey at local lever 	Medium	Medium
- Geodetic firms - IT firms - Contractors, OHS specialist, Supervision engineer, Designer, Design auditor	- Increased workload and work opportunities gaining knowledge and experience on how to design, perform design audit, implement construction works, supervise and perform occupational health and safety supervision on project financed by the WB, assuring compliance with ESF standards and using related tools	High	Medium
- Ministry of Culture and Media	- Preservation of cultural heritage (if applicable)	High	High
- MoJPA - SGA - PIU	- Higher quality/modern and integrated infrastructure with improved service delivery to citizens. - Digitalized and improved services for LRO and CSOs	High	High

7. STAKEHOLDER ENGAGEMENT PROGRAM

7.1. Purpose and timing of stakeholder engagement program

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. Stakeholder engagement activities envisaged under the project and their frequency will be precisely defined for subprojects with infrastructure investments through the preparation of the site specific stakeholder engagement plans and adapted three main subproject stages (preparation; implementation/construction; post-construction). Subproject SEPs will be prepared during project appraisal or in the first phases of project implementation depending on the specific situation at the level of each location, but always prior to the commencement of the design phase.

Stakeholder engagement activities for Component A, B, C, E

Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
- Local and	- Presentation of	- Meetings,	- Once before	Contracted

Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
regional self-government units	<ul style="list-style-type: none"> - cadaster survey process - Presentation of GRM - Satisfaction on cadaster survey 	<ul style="list-style-type: none"> - Presentations and printed materials - Phone, e-mail communication, project GRM - General satisfaction survey 	<ul style="list-style-type: none"> - and one once during cadastral survey - Once after cadastral survey (satisfaction survey) 	Geodetic firm under supervision of PIU
<ul style="list-style-type: none"> - General public / citizens (owners and users of land and buildings) 	<ul style="list-style-type: none"> - Presentation of cadaster survey process - Presentation of GRM - Satisfaction on cadaster survey and other project activities 	<ul style="list-style-type: none"> - Presentations and printed materials - Project GRM - General satisfaction survey 	<ul style="list-style-type: none"> - Once before and one once during cadastral survey - Once after cadastral survey (satisfaction survey) 	Contracted Geodetic firm under supervision of PIU
<ul style="list-style-type: none"> - Chamber of notaries and notaries, Lawyers and bar associations , chamber of geodetic engineers 	<ul style="list-style-type: none"> - Satisfaction with new work methodologies and developed tools 	<ul style="list-style-type: none"> - Meetings - Presentations - Project GRM - General satisfaction survey 	Before and after implementation of specific activities	PIU
Other interested parties				
<ul style="list-style-type: none"> - National and local media channels 	<ul style="list-style-type: none"> - Information on project activities and results 	<ul style="list-style-type: none"> - Meetings - Phone - e-mail - Press releases 	Before and after implementation of specific activities	PIU, MoJPA and SGA PR service
<ul style="list-style-type: none"> - MoJPA - SGA and its local branches - Court Management staff and 	<ul style="list-style-type: none"> - Satisfaction with implemented activities and their results 	<ul style="list-style-type: none"> - Meetings - Phone - e-mail - GRM 	Continuously during project implementation	PIU

Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
staff of LRO				
- Geodetic firms - IT firms	- Satisfaction with new work processes	Meetings Phone e-mail GRM	After implementation of specific activities	PIU
- Persons with disabilities - Women - Low-income persons - Minorities - Elderly and persons with limited access to digital technologies - Persons with no title	- Presentation of project activities - Collection of needs - Presentation of GRM - Satisfaction with implemented activities and their results (cadaster survey, digitalization)	- Presentations and printed materials - Project GRM - General satisfaction survey - Meetings	- Once before and one once during cadastral survey (if needed) - Once after cadastral survey (satisfaction survey)	PIU

7.2. Stakeholder engagement activities for Component D

Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
DESIGN PHASE				
- Management staff and staff of cadaster and judicial bodies located in new integrated infrastructure. - Judicial police staff	- Present project and subproject, timeframes, WBs ESF and related tools - Collect needs and feedbacks related to infrastructure - Present project and subproject GRM	- Meetings and printed materials - Presentations - Mail - Phone	Monthly	Designer under the supervision of PIU

<ul style="list-style-type: none"> - Lawyers and bar association - Vulnerable groups and CSO organizations representing plaintiffs and defendants and other vulnerable justice and cadaster system users 	<ul style="list-style-type: none"> - Present project and subproject, timeframes, WBs ESF and related tools - Collect needs and feedbacks related to infrastructure - Present project and subproject GRM 	<ul style="list-style-type: none"> - Meeting - Presentation and printed materials - Mail - Phone 	<p>At least once during design phase</p>	<p>Designer under supervision of PIU</p>
<ul style="list-style-type: none"> - Owners and/or users of land where new integrated infrastructure will be located (if applicable) 	<ul style="list-style-type: none"> - Present project and subproject, timeframes, WBs ESF (if relevant focus on RPF and related tools) - Present project and subproject GRM - Collect needs and feedback 	<ul style="list-style-type: none"> - Meetings and printed materials - Presentation - Mail - Phone 	<ul style="list-style-type: none"> - At least 2 meetings and presentation during design phase - Screening in line with RPF (if necessary) - Continuous mail and phone communication 	<p>PIU</p>
<ul style="list-style-type: none"> - Local self-government unit - National and local media channels Ministry of Culture and Medi 	<ul style="list-style-type: none"> - Present project information and progress updates 	<ul style="list-style-type: none"> - Meetings - Phone - E-mail - Presentation materials 	<ul style="list-style-type: none"> - Once during design phase 	<p>PIU</p>
<ul style="list-style-type: none"> - Designer, Design auditor 	<ul style="list-style-type: none"> - Present and control alignment with relevant legislation and ESF - Time plans - GRMs - Collecting feedback 	<ul style="list-style-type: none"> - Meetings - Phone - E-mail - Presentation materials 	<ul style="list-style-type: none"> - Monthly level 	<p>PIU</p>

Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
CONSTRUCTION PHASE				
<ul style="list-style-type: none"> - Management staff and staff of cadaster and judicial bodies located in new integrated infrastructure. - Judicial police staff 	<ul style="list-style-type: none"> - Present progress updates, potential difficulties, deviations from timetables - Rising awareness and functioning of project GRM and labor GRM - Collect grievances and satisfaction on grievance resolution 	<ul style="list-style-type: none"> - Meetings - Presentations and printed materials - Mail - Phone 	Monthly	PIU
<ul style="list-style-type: none"> - Lawyers and bar association - Vulnerable groups and CSO organizations representing plaintiffs and defendants and other vulnerable justice and cadaster system users - Inhabitants of neighboring buildings 	<ul style="list-style-type: none"> - Present project information and progress updates. - Disclose all relevant project documents. - Informing on parking restrictions and regulation for traffic safety - Rising awareness on GRM - Collect feedback 	<ul style="list-style-type: none"> - Presentation and printed materials - Meetings 	- Once during phase	PIU
<ul style="list-style-type: none"> - National and local media channels - Representatives of local self-government units 	<ul style="list-style-type: none"> - Present project information and progress updates. 	<ul style="list-style-type: none"> - Presentation materials 	- Once during phase	PIU

- General public				
- Contractors, OHS specialist, Supervision engineer, Designer, Design auditor.	<ul style="list-style-type: none"> - Present and control alignment of with relevant legislation and ESF - Rising awareness and control functioning of project GRM and labor GRM - Time plans - Collecting feedback from project and labor GRM 	<ul style="list-style-type: none"> - Meetings - Phone - E-mail - Presentation materials 	- Monthly level during phase	PIU
Stakeholder	Topic(s) of engagement	Methods used	Location/ Frequency	Responsibilities
POSTCONSTRUCTION PHASE				
<ul style="list-style-type: none"> - Management staff and Staff of cadaster and judicial bodies located in new integrated infrastructure. - Judicial police staff 	- Collecting level of satisfaction on implemented works and enhanced working conditions.	<ul style="list-style-type: none"> - Meetings - Presentations 	- Once during phase	PIU
<ul style="list-style-type: none"> - Lawyers and bar association - Vulnerable groups and CSO organizations representing plaintiffs and defendants and other vulnerable justice and cadaster system users 	- Collecting level of satisfaction on implemented works and related services.	<ul style="list-style-type: none"> - Meetings - Presentations 	- Once during phase	PIU

- National and local media channels	- Present project information and progress updates.	- Presentation materials	- Once during phase	PIU
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For infrastructure sub-projects located in Rijeka and Velika Gorica, certain stakeholder engagement activities will be carried out during the E&S screening process and project risk classification. These activities will be more precisely defined in site specific SEPs. If proofs to be necessary, the same approach will be applied for infrastructure sub-projects in Novska and Bjelovar.

8. RESOURCES AND RESPONSIBILITIES

The development of project SEP and subproject SEPs (that will be developed at least for subprojects in Rijeka, Velika Gorica, Bjelovar and Novska), as well as the implementation of stakeholder engagement activities will be the responsibility of the Implementing agencies with support of PIU that will engage a Social Specialist. All stakeholder engagement activities mentioned in table above will be financed by the budget of the implementing agencies and/or project funds. The PIU social specialist will regularly monitor on the implementation of the SEP and subproject SEPs and report to the WB.

9. INFORMATION DISCLOSURE

The implementing agencies with support of PIU will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. Stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available project-related information as early as possible is important.

Site-specific documents and tools developed within the WBs ESF will constitute an integral part of bidding documents for contractors. These site-specific tools will be timely disclosed and discussed with public.

Documentation and information on updates from the project activities and the result of consultation with stakeholders will be disclosed by PIU throughout next information dissemination channels:

- MoJPA website: <https://mpu.gov.hr/>
- SGA website: <https://dgu.gov.hr/>
- National and local media
- Bulletin boards of judicial building and cadaster offices
- Bulletin boards of towns and cities where project activities are implemented.

10. CONSULTATION SCHEDULE

The consultation strategy adopted by the project is to focus on stakeholder engagement at the sub-project level through the implementation of the subproject stakeholder engagement plans.

The Project SEP as well as other E&S instruments were presented during stakeholder engagement activities carried out prior to project appraisal and negotiation through MoJPA web site and within specifically organized meetings and workshops. The E&S instruments were published on the project dedicated page of the MoJPA for more than 30 days, specifically from the 8th of December 2023 to the 8th of January 2024. This allowed to provide relevant information on project activities to stakeholders, enabling them to submit written comments, suggestions or grievances related to project activities. During this period, however, no comments or suggestions were received.

Before project appraisal and negotiation a meeting was held presenting the Project to current users of the plots where the future integrated infrastructure in Novska will be located. During the meeting

they expressed their support to the project and gave positive feedbacks. Moreover, the project, the ESF and the related instruments were presented to stakeholders in a dedicated workshop held online and physically in the premises of the MoJPA in December 2023. Stakeholders invited to participate in the presentation were organizations representing vulnerable groups and the vulnerable justice system users (i.e. NGOs dealing with protection of victims and witnesses), organizations dealing with issues related to gender equality, rights of minorities, elderly persons and persons with disabilities. Stakeholders that were present during the presentation included representatives of the Croatian Chamber of Certified Geodetic Engineers and Croatian Chamber of Notaries as well as representatives of the local self-government units but they had no specific comments, grievances or suggestions on the project.

The sub-project level stakeholder engagement plan will also be published on the project dedicated page of the implementing agencies web site. Furthermore, the sub-project level engagement plan will be presented to management staff of cadaster and judicial bodies during dedicated meetings and, through them, to the rest of the staff by e-mail communication. If particular social risk occurs while choosing the exact location of the new integrated infrastructure (with focus on ESS5) as well as during design phase and implementation of works increased stakeholder engagement activities will be foreseen within the subproject level SEPs. Increased stakeholder engagement activities will focus on transparent information and increasing knowledge and awareness of stakeholders on project and subproject GRM procedures.

11. MONITORING AND REPORTING

Reporting is an integral part of the monitoring process as it provides valuable insight into project processes as well as decision-making information to the Project Implementation Unit (PIU) and WB teams. Consequently, it enables timely interventions and adjustment of corrective measures. Unless differently agreed with the WB Environmental and Social Specialists, the PIU will report on the implementation of SEP and subproject SEP in regular progress reports and upon request of WB Environmental and Social Specialists.

Stakeholders will be kept informed on project environmental and social performance on the implementation of project SEP and GRM, as well as on the project's overall implementation progress through short reports published on MoJPA and SGA websites.

At the level of each subproject SEP particular focus of monitoring and reporting:

- during the phase related to choosing the exact location of the new integrated infrastructure will be on the potential ESS5 risks and dedicated GRM mechanisms
- during design phase on the involvement and collection of needs of the court users, court and cadaster staff and management staff and dedicated GRM mechanisms
- during implementation / construction phase on the involvement and collection of needs of the court users, court and cadaster staff and management staff and construction workers as well as on the dedicated Labor related GRM mechanisms

During implementation of works regular weekly meetings are foreseen among "construction" stakeholders (contractors, supervising engineer, construction project manager (where relevant), designer; occupational health and safety (OHS) specialist) and monthly meetings with PIU and implementing agencies representatives. The Supervising engineer is obliged to write minutes from the held meetings and distribute it to all stakeholders on confirmation. The monitoring of implementation implies constant communication among contractors, supervising engineer, construction project manager (where relevant), designer; occupational health and safety (OHS) specialist, the PIU and implementing agencies representatives and the management staff of cadaster and judicial bodies. Monitoring also includes control of reports submitted by the Supervising Engineer and on-the-spot checks. PIU will conduct on-the-spot checks in all stages of the project (ad hoc or related to the payments). During the implementation of the contract, it is possible to hold additional ad hoc meetings (regardless of the party organizing it) at which the PIU is required to

participate depending on the assessment, to monitor the implementation and to resolve possible difficulties related to the implementation of the contract.

More particularly, the supervising engineer or the designated responsible person will report on relevant ESF tools to the PIU, monthly. In the case of significant non-compliance, the PIU will, without delay, inform the WB Environmental and Social Specialists of the nature, size, and scope of the impact. Unless differently agreed with the WB Environmental and Social Specialists, the PIU will report on implementation compliance with ESF tools in regular progress reports (when reporting on SEP) and upon request of WB Environmental and Social Specialists. In the case the Contractor breached the measures defined in relevant ESF tools and/or applicable national regulation, and non-compliance is confirmed, the PIU will propose corrective measures as well as the timeframe (deadline) for the implementation. If the corrective measures are not implemented and compliance criteria does not meet within the defined timeframe, the PIU can consider withholding the payment until the Contractor responds to these requirements and requests and compliance is accomplished and re-confirmed (either through a location inspection or desk review).

12. GRIEVANCE REDRESS MECHANISM

A Grievance Redress Mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints, feedback, questions, and suggestions from citizens and affected communities at the level of the project.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and will follow the required procedures. All grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism.

12.1. Objectives of the project based GRM

The project based GRM is intended to serve as a mechanism to:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the project.
- Strengthen accountability to beneficiaries, including project-affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns.

Having an effective GRM in place will also serve the objectives of reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

12.2. Project-based GRM overview and structure

The GRM will be accessible to a broad range of project stakeholders who are likely to be affected directly or indirectly by the project. The GRM can be used to submit complaints, feedback, queries, suggestions, or compliments related to the overall management and implementation of the project activities. The GRM's functions are based on the principles of transparency, accessibility, inclusiveness, fairness, impartiality, responsiveness and ensures mechanism for lodging Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) complaints.

The GRM procedures is disclosed and published on the project dedicated page of the implementing agencies website, available on the bulletin boards towns and cities where the news integrated

infrastructures will be located and where cadaster survey will be implemented. GRM mechanisms will be presented to stakeholders in line with subproject SEP provisions. GRM related obligations will be included in procurement / bidding procedures for acquiring services of technical design, supervising engineer, construction project management, occupational health, and safety (OHS) specialist and every other relevant service as well as during construction (contractor and subcontractor obligations).

Specific subproject SEP with containing information on project GRM will be developed.

- during the phase related to choosing the exact location of the new integrated infrastructure in order to screen, avoid, mitigate risks related to ESS5
- during design phase to collect needs of the court users and court and cadaster staff and management staff
- during implementation / construction phase to collect needs of the court users and court and cadaster staff and management staff and construction workers (focus on migrant workers and dedicated Labor related GRM mechanisms)

Once a grievance is received, the PIU Social Specialist, PIU members and, if relevant, implementing agencies staff, will determine whether the complaints warrant further consideration as a relevant grievance. If the matter has standing, grievance information will be registered, reported, and tracked in a grievance log by the PIU Social Specialist. The information recorded in the Grievance log include: name of complainant (if treated as non-confidential), location and address of Complainant (if available), grievance description, level of impact, person responsible for managing the grievance, findings of grievance investigation, description of measures undertaken to settle the grievance, feedback from Complainant on level of satisfaction regarding grievance resolution or non-resolution, date of acknowledgement of receipt and of settlement response, status.

All grievances will be acknowledged within 7 days; and responded to no later than 30 days. If the grievance is deemed as non-relevant (not occurred because of project related activities), the PIU Social Specialist will record the reason and inform the complainant with explanation.

A grievance will be considered “resolved” or “closed” when a resolution has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. In certain situations, however, the Project may “close” a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. The PIU will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

Workers GRM

A grievance mechanisms will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measure will be put in place to make the grievance mechanism easily accessible to all such project workers. Project workers should be able to raise concerns regarding unsafe or unhealthy work situations through the grievance mechanism.

The workers GRM will include:

- A channel to receive grievances such as comment/complaint form, suggestion boxes, email.
- Stipulated timeframes to respond to grievances.
- A register to record and track the timely resolution of grievances.

- A responsible person/section/committee to receive, record and track resolution of grievances.

The PIU will review the records and report on the workers grievances, response time and resolution status in a semi-annual report to the WB. The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The point of contact regarding project and workers grievance management is the PIU Social Specialist:

Marija Herceg Selandari
marija.hercegselandari.ext@mpu.hr

Other mechanisms that can be used to submit complain related to the project are those established by the WB (described below).

12.3. WB's complaint mechanisms practice

Project stakeholders and citizens can also submit complaints regarding the project activities through the World Bank Grievance Redress Service (GRS). Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to existing project-level grievance-redress mechanism or to the WB's (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel (IP), which determines whether harm occurred, or could occur, because of the WB noncompliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management (BM) has been given an opportunity to respond. For information on how to submit complaints to the WB's GRS, please visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the WB's Inspection Panel, please visit www.inspectionpanel.org.