

Republic of Croatia

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

Integrated Land Administration and Justice Services Project

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

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Abbreviations and Acronyms

CEPEJ	European Commission for the Efficiency of Justice
CHMP	Cultural Heritage Management Plan
CO	Cadaster offices
EEW	Electrical and Electronical Waste
ESCOP	Environmental and Social Codes of Practice
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
IFC	International Financial Corporation
ILAS	Integrated Land Administration Systems Project
IP	Inspection Panel
J4B	Justice for Business Project
JIS	Joint information system
LMP	Labor Management Procedures
LRO	Land registry offices
MoJPA	Ministry of Justice and Public Administration
MoPPCSA	Ministry of Physical Planning, Construction, and State Assets
NGO	Nongovernmental Organization
OHS	Occupational Health and Safety
OSS	One Stop Shop
PAP	Project Affected Persons
PDO	Project Development Objectives
PIU	Project Implementation Unit
RAP	Resettlement Action Plans
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SGA	State Geodetic Administration
SH	Sexual Harassment

1. EXECUTIVE SUMMARY

The World Bank will be supporting Ministry of Justice and Public Administration (MoJPA) and the State Geodetic Administration (SGA) in implementing the Integrated Land Administration and Justice Services Project. The objective of the project is to (i) improve functional integration of Croatia's land and justice institutions; and (ii) enhance services for citizens. The project will support activities listed below.

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 activities will take place nationwide with the exception of component D that includes construction of new infrastructure in areas possibly to include Novska, Rijeka, Bjelovar and Velika Gorica. Specific locations of subprojects in Rijeka and Velika Gorica are not known at this stage, because

the most suitable land plots where the new integrated infrastructure will be built are still under consideration. The subproject locations will be known within the first year of project implementation.

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of proposed Project activities and propose suitable mitigation measures to manage these risks and impacts. It maps out the Republic of Croatia laws and regulations and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

Potential environmental risks

Environmental risks for all activities are expected to be low to moderate, due to the project design and as they are carried out in the regulatory and functional EU institutional environment. Component that carry out environmentally significant activities is Component D: Integrated Court, LROs and COs Infrastructure. Environmental risks are predominately linked to the construction of new integrated infrastructure (construction of new buildings in Bjelovar, Novska, Velika Gorica and Rijeka). The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the project activities are neither complex nor large, do not involve activities that have a high potential for harming people or the environment, and it is expected that the chosen location will be far from environmentally sensitive areas. As such, the potential risks and impacts are (i) predictable and expected to be temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the project; and have (iv) low probability of serious adverse effects to human health and/or the environment. These impacts most commonly include: dust and noise due to excavation, demolition and construction; management of demolition / construction wastes and accidental spillage of machine oil, lubricants, etc.; possible management of small amount of hazardous materials and waste like asbestos or paints and varnishes; traffic disturbance; small scale surface or ground water pollution; soil pollution or erosion; OHS related risks etc. It is possible that management of larger amounts of pesticide-contaminated soil will also take place.

No adverse impacts on biodiversity and habitats are expected because all locations are outside protected areas and NATURA 2000 Network.

Risks related to cultural and historical heritage can be considered low because the locations for construction planned in Velika Gorica and Rijeka are located in urban areas that are not protected by the Law on the Protection and Preservation of Cultural Property. The location in Novska is located within the historical architectural complex (urban settlements) and the zone of partial protection of historical structures. As it is about the construction of a new building, and there are no buildings on the plot with the status of protected cultural property, conservators only have the possibility of controlling the intervention in terms of adapting the design to the environment.

The location in Bjelovar is located within the complex of court buildings and prisons in Bjelovar, which is a protected cultural property under the designation Z-2922. For this location, the main and detailed project is produced and it respects all the conditions of the conservation department, which we can consider minimal as far as the construction of the building itself and landscaping are concerned. Any artefacts or other possible "chance finds" is not expected during excavation.

Potential social risks

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 related to the implicated potential disputes during cadastral survey and land registration activities (Component C) is nonexistent. The cadaster surveys provide free public procedure for settlement of previous disputes and improve legal certainty of land ownership. Other eventual claims on properties (such as claims for the restitution of land seized during the Yugoslav era, family disputes, inheritance and any other issues of land registration) on the land under the cadastral survey remain 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 in Bjelovar, Novska, Velika Gorica and City of Rijeka as well as small refurbishing works for 30 COs are typical for construction activities: occupational health and safety (OHS) and community health and safety risks, labor management risks. Additionally, potential land use issues and involuntary resettlement issues cannot be excluded at this stage. Also, there are potential risks of poor or a lack of communication and information exchange among stakeholders. The civil works to be performed are small to medium in magnitude and as such the impacts can be easily and predictably mitigated by proper organization of construction site and continuous communication with all stakeholders and by developing specific tools foreseen in Environmental and Social Framework (ESF).

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).
- Potential community risks related to foreign labor influx are present.

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 - consultants to perform specialized tasks (e.g., 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 Gender Based Violence (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 risks related to land acquisition, restriction on land use and involuntary resettlement that cannot be excluded. Considering the above, meaningful consultation and stakeholder engagement shall be conducted during the whole life-cycle 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.

The Project will not finance any activities listed in the International Financial Corporation's (IFC)s Exclusion list not any sub-projects rated substantial or high E&S risk.

Risk management and mitigation measures

These identified risks will be managed and mitigated through the application of:

- E&S Screening questionnaire that identifies potential E&S risks and issues of sub-projects and provides key data for determining risks and adequate instrument for site-specific sub-projects;
- The Environmental and Social Management Framework (ESMF) is an instrument that examines the risks and impacts when a project consists of a series of subprojects, and/or the location or scope of intervention is unknown and the risks and impacts cannot be determined until the sub-

project details have been identified. Since some of the specific sub-project locations will be determined during the project implementation, the ESMF was found to be the most appropriate environmental and social due diligence instrument. Draft ESMP for known locations (in Bjelovar and Novska) will be prepared as an annex to the Project ESMF and updated and finalized during the Project implementation (before works are contracted). The ESMF ensures that the identified sub-projects are correctly assessed and mitigated from environmental and social point of view to meet requirements of the WB ESF and its applicable Environmental and Social Standards (ESS), as well as national environmental and social legislation. It sets out the principles, rules, guidelines, procedures and codes of practice for the management of environmental and social issues that might arise during Project implementation, and as such constitutes a set of measures for the development of subproject level E&S instruments - Environmental and Social Management Plans (ESMPs) and or ESMP Checklists with/without Cultural Heritage Management Plans (CHMPs).

- ESMP is an instrument that details the material measures to be taken during the implementation and operation of a project to eliminate, mitigate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and the actions needed to implement these measures. Subproject ESMPs or ESMP Checklists will be prepared during design phase, but always prior to the commencement of the construction phase.
- CHMP is prepared based on the nature and scale risks to cultural heritage, and impacts on, cultural heritage. It includes measures for identifying and managing the cultural heritage (both required by the national competent authorities and regulation as well as Good International Industry Practices (GIIP) and ESF), together with monitoring arrangements. Subproject CHMPs will be prepared during design phase, but always prior to the contracting of the construction phase.
- The stakeholder engagement processes, in line with project and sub-project level stakeholder engagement plans implemented and/or overviewed by the PIU social specialists. A Project Stakeholder Engagement Plan (SEP) has been prepared during Project appraisal phase, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here:
<https://mpu.gov.hr/UserDocsImages//dokumenti/Projekti/Svjetska%20banka//SEP-EN.pdf>
- 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.
- Project 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 GRM is an integral part of the project SEP and was, thus, prepared during project appraisal phase.
The point of contact regarding grievance is the PIU Social specialist, Marija Herceg Selandari, e-mail contact: marija.hercegselandari.ext@mpu.hr.
- Specific sub-project grievance mechanisms are an integral part of the subproject SEPs and will be prepared depending on the specific situation at the level of each location

- Labor management procedures (LMP) categorize and elaborate how the project workers (direct workers but also workers of third parties) will be managed, in accordance with the requirements of national law and ESS2. The LMP has been prepared during Project appraisal phase. The LMP can be found here:
<https://mpu.gov.hr/UserDocsImages//dokumenti/Projekti/Svjetska%20banka//LMP.pdf>
- Resettlement policy framework (RPF) is a tool that clarifies resettlement principles, organizational arrangements, and design criteria to be applied to subprojects in the event risks related to land acquisition, restrictions on land use and involuntary resettlement would occur. It has been prepared during Project appraisal phase. If needed, during project implementation the proposed subproject locations could be screened to assess whether land acquisition may be required and to what extent. Following the screening process if related risks and potential impacts occur, a Resettlement action plan shall be prepared as a further tool ensuring that all project activities adhere to the requirements of RPF. The RPF can be found here:
<https://mpu.gov.hr/UserDocsImages//dokumenti/Projekti/Svjetska%20banka//RPF.pdf>

Implementation Arrangements.

Project actions dealing with Social and Environmental Framework will be managed by the PIU for the two implementing agencies, MoJPA and SGA, and financed via Component E. Both agencies have considerable experience implementing WB-financed projects. A single PIU will manage implementation of project activities, representing both MoJPA and SGA. Where activities are joint activities implemented by MoJPA and SGA both entities will have signing authority. Where activities fall under the mandate of a single entity only that entity will have signing authority.

Monitoring

Implementation progress of the Project will be monitored based on completed procurements, project disbursements, and achievement of the results indicators. Under ILAS and J4B, the PIU has developed a comprehensive M&E system to monitor the progress of the project activities. This M&E system will be modified as needed to ensure adequate monitoring of the Project Development Objectives (PDO), meeting Environmental and Social Commitment Plan (ESCP) goals and requirements and intermediate results indicators and periodic reporting. In addition to implementation support missions conducted by the Bank every six months, the PIU will be required to submit biannual progress reports to its management and the Bank for review. A Mid-Term Review will be carried out by the Bank at the mid-point of project implementation to assess the overall project progress, identify critical implementation issues, and make any necessary revisions to the project design or schedule.

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 tools developed as a result of ESF in regular progress reports and upon request of WB Environmental and Social Specialists.

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

- 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 and of 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 conformation. 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. As above stated, 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 ESMP) 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/or incompliance is recorded, 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 responses to these requirements and requests and compliance is accomplished and re-confirmed (either through a location inspection or desk review).

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based the World Bank’s Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: <https://mpu.gov.hr/UserDocsImages//dokumenti/Projekti/Svjetska%20banka//SEP-EN.pdf>

2. INTRODUCTION

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the Integrated Land Administration and Justice Services Project. The project will support improvement of functional integration of Croatia's land and justice institutions and enhancement of the services for citizens nationwide in Croatia through the digitization and integration of land registry court data and services; enhanced geospatial data; enhanced digital integration of land register and cadaster; improved service delivery and establishment of a new structure for addressing appeals of land disputes through the rehabilitation of court, registry and cadaster infrastructure to international and EU standards in Novska, Rijeka, Bjelovar and Velika Gorica. The Ministry of Justice and Public Administration (MoJPA) and State Geodetic Administration (SGA) will be implementing the Project activities.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Republic of Croatia. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), the Resettlement Policy Framework and the Labor Management Procedures.

The high draft of the ESMF will be disclosed on MoJPA and SGA websites prior to appraisal. Public consultations will last for at least 15 days. The ESMF will be finalized, consulted, WB approved and redisclosed on MoJPA and SGA websites by loan agreement effectiveness date. Feedback will be provided for all relevant comments and questions.

The objectives of the public disclosure are:

- To inform the public and stakeholders about the objectives and project developments and the expected of environmental and social effects.
- To collect information and data from the public and/or the communities that may be affected by the project.
- To amend the project and ESMF accordingly in order to achieve sustainability objectives.
- To ensure participation of the public and local communities in process and support for the project.

The ESMF will be considered final when the relevant comments and provided feedback, submitted during the disclosure period, will be: (i) addressed in the ESMF and (ii) incorporated in a separate chapter or annex. Once finalized, ESMF will be re-disclosed on the MSE web site.

3. Project Description

The World Bank will be supporting Ministry of Justice and Public Administration (MoJPA) and the State Geodetic Administration (SGA) in implementing the Integrated Land Administration and Justice Services Project. The objective of the project is to (i) improve functional integration of Croatia's land and justice institutions; and (ii) enhance services for citizens. A short description of project components follows.

Component A. Integrated Digital Land Registry and Court Services This component 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 JIS and other online systems. With the passage of the Court Fees Act, which entered into force on January 1, 2019, and reduces court fees when using e-communication, MoJPA is working to increase the use of its ICMS and Case Tracking System (CTS) to promote the adoption of e-communication between court users and the courts. MoJPA also seeks to ensure the interoperability of the ICMS and CTS with separate information systems and databases managed by other government entities. The activities will directly contribute to digital transformation (scanning and digitizing of land court records), enhanced management of business processes, asset management and management of IT contracts and systems. Additional scanning of land registry records and court decisions will increase public access to land data while legal professionals will have increased access to court decisions and court staff better access to land records needed to resolve court cases.

Component B: Integrated Digital Services of State Registers and Geospatial This component 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. LiDAR surveys will also be implemented to generate precise, 3D topographical data that is also needed for land use planning and disaster risk management and recovery efforts. The Croatian Positioning System (CROPOS) will be upgraded to ensure transmission of real-time positioning data, which will result in more accurate geospatial data from land surveys. The SGA Digital Archive will also be further enhanced to increase the number of documents it contains and improve data quality. Under the ILAS project, more than two-thirds of land transactions have moved online and, per recent land registration legislative changes, all land transactions are being submitted online. Development and implementation of a proposed Virtual Assistant for the SGA will help citizens and businesses navigate online services.

Component C: Further Digital Integration of Land Register and Cadaster Under Component C, enhancements will be made to the JIS and 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. As part of the Multi-Annual Plan for

Cadastral Surveys in Construction Areas for 2021 - 2030, new cadastral surveys and land register establishment/renewal will be conducted to improve accuracy and corrections to cadaster and land registry records, which will provide citizens and landowners with clearer land rights. These activities will also feed into the improved accuracy of the cadastral data layer accessible via the JIS for more informed climate change adaptation and mitigation planning initiatives. To speed up needed land data corrections, MoJPA has developed a system to delegate certain tasks to notaries to expedite the process and reduce burdens on court clerks. The activities under this component will also allow for opportunities to use interoperable data for service improvement, such as providing judges enhanced access via JIS and ICMS data links to full case files for cases involving property and automatic digital notification to initiate changes to land records based on court decisions. The component activities will also support updates to the methodology for developing Croatia's Building Registry, upgrades of the IT system if required, and piloting and rollout. The Building Registry information system is interoperable with the JIS. The data produced will be shared with public institutions to inform energy analysis, disaster and flood simulations, resource management and overall climate-smart decision-making for green and sustainable development, including energy efficient, low-carbon buildings. E-services will improve access for citizens and businesses and will support the shift to mandatory online applications for land transactions. Additional avenues for land and justice data sharing will be explored, such as issues concerning inheritance of real estate, family law (divorce, alimony and child support), debt and gender-based violence (protection orders).

Component D: Integrated Court, LROs and COs Infrastructure This component would provide construction of new court, registry and cadaster infrastructure to international and EU standards supporting improved service delivery. This component builds on the successful experience of the J4B project rehabilitating the Zagreb Municipal Civil Court and judicial facilities in Vinkovci, Kutina and Varaždin, and renovation of the Zagreb Land Registry Office through ILAS. This component will support construction of infrastructure in areas possibly to include Novska, Rijeka, Bjelovar and Velika Gorica. Sites would include cadaster and LROs and would allow for functional integration with courts and provide a model for future new or renovation of court and cadaster facilities. With the shift to online submission of land transactions and increasing remote hearings for courts, the building designs can consider that office space needs may decrease the need for face-to-face contact. Design will also reflect global trends in providing user-friendly spaces, including for courts facilitating services for cases involving families and children. At the moment of project appraisal the exact locations of the planned new integrated infrastructure in Rijeka and Velika Gorica are not yet known. A possible area in Rijeka could be within around publicly owned 42 ha for which the City of Rijeka is developing a new Urban Plan. The city of Rijeka leases a part of the area to citizens for their city gardens, agricultural and leisure purpose. Public consultations for new Urban Plan are planned by the end of 2023.

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 This component 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. A joint PIU is already supporting implementation of ILAS and J4B, and the same team will support implementation of the project, with adjustments to staffing as needed. At a minimum, the PIU will include a project manager, M&E specialist, procurement specialist, financial management (FM) specialist, information technology specialist, civil engineer, architect, and social specialist. 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. Component D's public awareness activities will aim to inform both professional users and the public about the e-services introduced by MoJPA and SGA and the benefits of data quality improvement as a result of project activities. MoJPA and SGA will also conduct customer satisfaction surveys concerning the use of new e-services as part of the M&E activities.

The Ministry of Justice and Public Administration (MoJPA) and the State Geodetic Administration (SGA) will coordinate project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities.

The Component A will be implemented solely by the MoJPA as it is related to the Integrated Digital Land Registry and Court Services and foresees implementation of activities that are under the competence of the Ministry and that include, among others, scanning and digitizing land and court records, improvements of e-services in courts, land registry and cadaster.

The Component B will be implemented solely by the SGA as it is related to the Integrated Digital Services of Official Registries and Spatial Data and foresees implementation of activities that are under the competence of the SGA such as improvement of infrastructure Cadaster, carrying Lidar surveys, improvements to CROPOS and of the SGA digital archive.

The Components C, D, and E will be implemented jointly.

The Component C supports further digital integration of Land registry and Cadaster. The responsibility for each sub-component depends on the nature of foreseen activities and different competencies of the two institutions.

The Component D will be implemented jointly by the SGA and MoJPA as it is related to Infrastructure Integration of Land registry and Cadaster. As Component D relates to construction of new buildings of whole courts not just Land administration services (LRO's and CO's), MoJPA will take lead in implementation, while SGA will provide inputs and supervise the questions of spaces for CO's. The SGA will be responsible for the implementation of the subcomponent that includes improvement (cabling) of 30 CO's locations.

The Component E "Institutional Capacity Building, Policy Analysis, and Project Management" will be implemented jointly by the SGA and MoJPA

Project activities (sub-projects) that may have environmental risks and impacts.

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 towns of Novska, Rijeka, Bjelovar and Velika Gorica. This component will also support provision of new ICT cabling to improve digital services in thirty COs. Some small refurbishing works are also possible under Component D. Risks related to Component A include (i) generation of large amounts of waste documents (potentially recyclables) and their processing or landfilling; OHS risks related to management of old documents and working in insufficiently aired, dusty and potentially mold-contaminated facilities (e.g. basement repositories/archives). Under Component D (and possibly A) purchase and installation of larger amounts of IT equipment (e.g. servers) may be required, with potential implications related to electrical and electronic waste (EEW) of equipment, heat production in use phase and energy consumption (for work, cooling, etc.).

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.

Project activities (sub-projects) that have 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 potential disputes during cadastral survey and land registration activities (Component C) if overlaying claims on property and land arise especially in the case of inheritance, family disputes, issues of land registration of claimants with no title and pending land claims from property seized during the Yugoslav Communist Government. Nevertheless, cadaster surveys improve legal certainty of land ownership and is free for all residents while eventual claims on properties due to restitution from the Yugoslav era, family disputes, inheritance and any other issues of land registration are separate procedures that are taken into consideration and noted during the process.

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:

- involuntary land acquisition and changes in land use for cases where the exact location of the future infrastructure is not known (Rijeka and Velika Gorica)
- Community health and safety risks related to civil works.
- Labor risks for direct, contracted, and primary supply works, related to OHS terms of employment and potential use of migrant workers less aware of their rights, unable to communicate and could face discriminatory treatment by employees of local communities.
- Potential overlap in use of entries / exits and corridors of prisoners and justice users as the Bjelovar court if the proposed works are not re-designed.

4. ENVIRONMENTAL AND SOCIAL POLICIES, REGULATIONS, AND LAWS

4.1 Republic of Croatia Legal Framework

Laws and pursuant delegated and implementing acts related to cadaster, geodetic activities and land registries are relevant for the implementation of Component A, B, and C as they lay down provisions establishing, regulating, managing and implementing land registry, cadaster, state survey, national spatial data and digitalization.

- Law on State Survey and Real Estate Catastre (Official Gazette 112/18, 39/22)
- Law on the National Spatial Data Infrastructure (Official Gazette 56/13, 52/18, 50/20)
- Law on geodetic activities (Official Gazette 25/18)
- Law on Land Registers (OG 63/19, 128/22)
- Law on Compensating for the Property Seized during the Yugoslav Communist Rule (OG 92/96, 39/99, 92/99, 92/99, 131/00, 27/00, 65/01, 118/01, 80/01, 81/02, 98/02 and 98/19)

Laws, and pursuant delegated and implementing act related to environmental and nature protection, protection of water resources, protection against fires as well as waste management are relevant for the implementation of Component D (but also A and C and possibly others) as they lay down provisions that have to be met while choosing the location, designing and constructing infrastructure as well as to assure compliance with the ESF. These include, but are not limited to:

- Environmental Protection Act (OG 80/13, 153/13, 78/15, 12/18, 118/18),
- Nature Protection Act (OG 80/13, 15/18, 14/19, 127/19),
- Water Act (OG 66/19, 84/21),
- Waste Management Act (OG 84/21),
- Fire Protection Act (OG 92/10, 114/22),
- Act on the Transport of Dangerous Goods (OG 79/07),
- Act on the Protection and Preservation of Cultural Property (OG 69/99, 151/03, 157/03, 100/04, 87/09, 88/10, 61/11, 25/12, 136/12, 157/13, 152/14, 98/15, 44/17, 90/18, 32/20, 62/20, 117/21, 114/22),
- Air Protection Act (OG 127/19, 57/22),
- Energy Efficiency Act (OG 127/14, 116/18, 25/20, 32/21, 41/21),
- Noise Protection Act (OG 30/09, 55/13, 153/13, 41/16, 114/18, 14/21),

- Act on Climate Change and Protection of the Ozone Layer (OG 127/19),
- Ordinance on construction waste and waste containing asbestos (OG 69/16),
- Act on water for human consumption (OG 30/23).

Laws, and pursuant delegated and implementing acts related to spatial planning, construction, protection and conservation of cultural heritage are relevant for the implementation of Component D as they lay down provisions that have to be met while choosing the location, designing and constructing infrastructure as well as to assure compliance with the ESF, part related to the environmental protection.

- Civil Obligations Act (OG 35/05, 41/08, 125/11, 78/15, 29/18, 126/21, 114/22, 156/22),
- Act on the Protection and Preservation of Cultural Heritage (OG 69/99, 151/03, 157/03, 100/04, 87/09, 88/10, 61/11, 25/12, 136/12, 157/13, 152/14, 98/15, 44/17, 90/18, 32/20, 62/20, 117/21, 114/22),
- Building Act (OG 153/13, 20/17, 39/19, 125/19),
- Spatial Planning Act (OG 153/13, 65/17, 114/18, 39/19, 98/19),
- Roads Act (OG 84/11, 22/13, 54/13, 148/13, 92/14, 110/19 144/21, 114/22, 114/22, 04/23),
- Standardization Act (OG 80/13).

Laws, and pursuant delegated and implementing acts related to occupational safety, labor, gender, anti-discrimination and foreigners, and right to access information are relevant for the implementation of Component D and to all the other components of the Project, as they lay down provisions that have to be met while choosing the location, designing and constructing infrastructure as well as in everyday works of implementing agencies and/or providers of services, works and equipment, and to assure compliance with the ESF.

- Occupational Safety Act (OG 71/14, 118/14, 94/18, 96/18),
- Labor Act (OG 93/14, 127/17, 98/19, 151/22, 64/23),
- Gender Equality Act (OG 82/08, 69/17),
- Anti-Discrimination Act (OG 85/08, 112/12),
- Constitutional Act on National Minorities Rights (OG 155/02, 47/10, 80/10, 93/11, 93/11),
- Act on Representativeness of Employers' Associations and Trade Unions (OG 93/14, 26/15),
- Pension Insurance Act (OG 157/13, 151/14, 33/15, 93/15, 120/16, 18/18, 62/18, 115/18, 102/19, 84/21, 119/22),
- Act on International and Temporary Protection (OG 70/15, 127/17),
- Foreigners Act (OG 133/20, 114/22, 151/22),
- The Act on Citizens of Member States of the European Economic Area and Their Family Members (OG 66/19, 53/20, 144/20 | 114/22),
- Ordinance on the residence of citizens of third countries in the Republic of Croatia (OG 20/22, 155/22),
- Decision of the Government of the Republic of Croatia on the introduction of temporary protection in the Republic of Croatia for displaced persons from Ukraine, March 2022.

Main Croatian legislation on right to access information:

- Act on the Right of Access to Information (OG 25/13, 85/15, 69/22)
- Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention)
- General Data Protection Regulation (GDPR)

4.2 National Environmental and Social Assessment and Permitting

Environmental assessment

The environmental impact assessment is the process of assessing the acceptability of the intended intervention with regard to the environment and determining the necessary environmental protection measures, in order to reduce the impacts to the smallest possible extent and achieve the greatest possible preservation of the quality of the environment. The assessment procedure is already carried out in the early stages of project planning, before the issuance of a location permit or other approval for a project for which the issuance of a location permit is not mandatory.

The Environmental Protection Act and the Regulation on Environmental Impact Assessment (OG 61/14 and 3/17) (Regulation) prescribe the implementation of the environmental impact assessment procedure. By adopting these regulations, the procedure was systematically regulated and harmonized with the relevant EU directives. In addition, the adopted regulations are based on the provisions of the international agreement, which the Republic of Croatia confirmed by the Law on Ratification of the Convention on Environmental Impact Assessment across State Borders (Official Gazette - International Agreements, 6/96).

In the List of interventions in Annex I, which is an integral part of the Regulation, interventions are listed for which the procedure for assessing the impact of interventions on the environment must be carried out. In the List of Interventions in Annex II., interventions are listed for which the procedure for assessing the impact of interventions on the environment for which the Ministry is responsible. In Annex III. interventions for which an assessment of the need to assess the impact of interventions on the environment for which the administrative body in the County or in the City of Zagreb is the competent authority. The criteria on the basis of which it is decided on the need to assess the impact of the intervention on the environment are listed in Annex V, which is an integral part of the Regulation.

The assessment procedure is initiated at the written request of the investor of the project, and the content of that request is prescribed in Article 80 of the Environmental Protection Act. The mandatory content of the Environmental Impact Study, which is an integral part of the request, is prescribed in more detail in Annex IV. of the Regulation. The impact of the intervention on the environment, its evaluation and acceptability is evaluated by a commission appointed by the Ministry for interventions that are specified in the Lists of interventions from Annex I and Annex II. Regulation, and the administrative body in the county, i.e. in the City of Zagreb, for interventions from Annex III. When the competent authority receives a request for an environmental impact assessment, it informs the public about it. The information contains basic information about the intervention, location, operator of the intervention, the competent authority, other participants in the procedure, the method of

implementation of the assessment procedure, the method of participation of the public and the interested public, and the method of informing about the outcome of the procedure.

Neither activity or component of the project, project activities or planned sub-projects are described in Annex I, Annex II of Annex III of the EIA regulation as triggering EIA or Environmental Study, thus confidently considered not subject to EIA. Eventually and if considered plausible as a precaution, for investments in the integrated infrastructure within component D (or any other) it could be possible to perform an assessment of the need for environmental impact assessment (screening). During this procedure the competent authority (Ministry or administrative body in the county or in the City of Zagreb), based on individual tests in accordance with the established criteria determines whether the planned project can have significant impacts on the environment and decides on the need for assessment.

Location and building permitting process

In the Republic of Croatia designing, construction and construction works supervision is regulated by the Construction Act and the Physical Planning Act, by-laws based on these acts and technical regulations¹. According to Physical Planning Act, the implementation document for interventions/projects defined in physical plans is a location permit, while under the Construction Act it is a construction permit. Ministry of Physical Planning, Construction and State Assets is competent authority for issuing: location permit for interventions planned by the national physical plan (except in nature park for which the permit is issued by the competent administrative body in the county), interventions defined by the special Regulation and interventions that take place in the area of two or more counties and the City of Zagreb. For issuing location permits for other interventions, the county administrative body is responsible. The Construction Act regulates the designing, construction, use and maintenance of construction works and the procedure and conditions for obtaining construction and use permit. By this Act essential requirements for health and occupational safety, environment protection and energy efficiency for construction works are defined. All construction works must be performed in such way to comply with these requirements. Construction and use permits are issued by the MoPPCSA, the administrative bodies of large cities (over 35.000 inhabitants), the City of Zagreb and the county. The MoPPCSA may delegate the authority to issue an individual permit to the administrative body of the big city, the City of Zagreb or the county. Without the construction permit, the removal of the building or its part can be carried out (Article 153 of the Construction Act), but it is necessary to have a project for the removal of the building. This applies only to buildings and works for which it is not necessary to obtain a building permit, as defined by the Ordinance on simple and other buildings works and works (OG 112/17, 334/18, 36/19, 98/19, 31/20, 74/22). This Ordinance defines simple and other buildings and works that can be built without a building permit in accordance with the main project and without main project, buildings that can be removed without a removal project. Also, this Ordinance defines the obligation to report the start of construction works and professional supervision of these buildings. The Ordinance on building maintenance (OG 122/14, 98/19) regulates the maintenance of buildings. This Ordinance

¹ detail list of legislation is available at: <https://mgipu.gov.hr/pristup-informacijama/zakoni-i-ostali-propisi/88>

prescribes the conditions for maintaining and improving the fulfilment of basic requirements for construction, energy performance of buildings and unimpeded access and movement in construction, as well as the manner of fulfilling and documenting the fulfilment of these requirements and properties.

Dangerous substances

The main regulations which define conditions for the transport of dangerous substances including hazardous waste in certain branches of transport are: Act on the Transport of Dangerous Substances (OG 79/07) that entered into force on January 1, 2008 and implements the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) as well as the corresponding Annexes A and B, which are amended every other year. This Act stipulates the obligations of persons participating in transport, the conditions for packaging and vehicles, the conditions for appointing safety advisers, rights and obligations, competence and conditions for training persons participating in the transport; competence state authorities and overseeing law enforcement. Thereby, it prescribes preventive safety measures and the procedure in case of an accident, measures in case of spillage or leakage of dangerous substances, documentation that must be possessed during the transport of dangerous substances and other requirements that must be met during the transport of dangerous substances.

Fire protection

Act on Fire Protection (OG 92/10,114/22) is an umbrella regulatory act on prevention, protection and safety from fire. Covenants of the act define stakeholders, responsibilities and responsible persons, rules and procedures that organize the fire-prevention system in Croatia including education, certification, organisational units and requirements, etc. Amongst other things, the Act defines that (i) every natural and legal person, state authority and local and regional self-government unit is obliged to act in a manner that cannot cause a fire; (ii) every natural and legal person, state authorities and local and regional self-government units is responsible for implementation of fire protection measures determined by the provisions of this Act and its by-laws adopted on the basis of care, plans and fire risk assessments, decisions of local and regional self-government units and other general acts in the field of fire protection. The Act also defines repercussions and responsibility for non-implementation of fire protection measures, causing fires, as well as for the consequences arising from it in accordance with the provisions of the law and decisions of local and regional self-government units. In addition to covenants described in the previous section (3.1.2) defining responsibility for maintaining plants, devices and installations of electrical, gas, ventilation and other purposes, chimneys and fireplaces, as well as other devices and installations, which can cause the occurrence and spread of fire and must have documentation on maintenance, Act on fire Protection requires Owners, users of buildings, construction parts and other real estate and premises, e.g. building managers are obliged to own devices, equipment and means for extinguishing fires. Further, according to the Act, each building or its part, depending on its purpose, must be maintained during its duration in such a way as to meet the essential requirement of fire protection. Each space or its part, depending on its purpose, must be maintained in a way that meets the prescribed fire protection measures. Firefighting is further organised under the Act on Firefighting (OG 125/19,114/22).

Procedure of obtaining necessary fire safety special conditions, permits and permissions

In the Republic of Croatia designing, construction and construction works supervision is regulated by the Construction Act and the Physical Planning Act, by-laws based on these acts and technical regulations.

Construction Act stipulates that fire safety is a basic requirement for buildings. Firesafety and fire protection requirements are further elaborated in the aforementioned as well as in the Fire Protection Act. The Fire Protection Elaborate in accordance with the Fire Protection Act serves as a basis for the creation of the main project, from which data is obtained for the design of fire protection measures in the main project.

In accordance with the Law on Construction, before submitting the request to the administrative authority for the issuance of a building permit, the investor is obliged to obtain special conditions from the public law authorities which in case of fire safety is the Ministry of Interior, Directorate for Fire Protection, and in line with the primary regulation being the Regulation on Fire Resistance and Other Requirements that Buildings Must Meet in Case of Fire (OG 29/13, 87/15). For aspects such as the calculation of fire compartment areas, fire load, the need for the introduction of certain systems (e.g. installation and tech. spec of sprinklers), and other not regulated by the Regulation on Fire Resistance(...) or other Croatian regulations, foreign guidelines and other regulations used as recognized rules of technical practice (Österreichisches Institut für Bautechnik OIB, British Standard (BS), National Fire Protection Association (NFPA), etc.) must be applied for the part not defined by Croatian regulation. If foreign guidelines are applied, only one guideline can be used, not a combination of different guidelines, and this must be done with the mandatory application of the relevant EU standards, which are accepted as the national standards.

In addition to the request for the determination of special conditions or confirmation (consent) submitted by the investor, it is necessary to attach the Fire Protection Elaborate (if there is an obligation prescribed by a special regulation) and one copy of all the books of the Main Project.

After the inspection of the Fire Protection Elaborate and the books of the Main Project in the field of fire protection, the Ministry of Interior will:

Issue a certificate if all necessary and prescribed fire protection measures have been defined and applied in the Fire Protection Elaboration, which is the basis for the creation of the Main Project (i.e. they contain all fire protection measures that would otherwise be prescribed through special conditions) and the Main Project is in fully compliant with the Fire Protection Elaborate;

or

Determine special construction conditions in the field of fire protection and request by letter from the applicant that, within 15 days, the Fire Protection Elaborate and the main project harmonize with the special conditions determined in this way, which are not defined in the Fire Protection Elaborate or all the necessary and prescribed measures have not been applied fire protection that the building in question must satisfy. If the applicant submits a harmonized fire protection report and the main project within the deadline, a certificate is issued, and if the fire protection report and the main project are not submitted or are still not in compliance with the prescribed and required fire protection measures, the request will be rejected by the Decision

or

The request will be rejected by the Decision if all the necessary and prescribed fire protection measures defined by the Fire Protection Elaborate have been applied (they contain all the necessary prescribed special conditions) but the Main Project is not aligned with the Fire Protection Elaboration.

Implementation of the conditions and decisions of the Ministry of Interior, Directorate for Fire Protection, is mandatory and cannot be altered. If there are Croatian regulations and/or laws for a specific issue related to fire protection, their application is mandatory, regardless of whether they are stricter or more lenient compared to foreign guidelines. If this is not the case, and the designer relies on foreign guidelines instead of existing Croatian regulations, the Ministry will not issue a confirmation of the main project and the conditions for obtaining a building permit will not be met.

After the completed works, which were carried out on the basis of the building permit and special conditions issued by the Ministry of Internal Affairs, Ministry of Internal Affairs inspects the completed works during the technical inspection. If the works are carried out according to the Fire Protection Elaborate and Main Project, Ministry of Internal Affairs issues a certificate on the basis of which a use permit is obtained.

As a member of the European Union, the Republic of Croatia has harmonized its fire protection regulations and standards in line with EU directives. If in some parts of the fire protection regulation there are no clearly defined guidelines regarding some technical elements, then good practices are taken from internationally recognized guidelines such as American Fire Protection Association (National Fire Protection Association - NFPA), the guidelines of Austrian Construction Institute (Österreichisches Institut für Bautechnik - OIB) or other.

Protection of cultural heritage

Historical buildings, cultural and historical entities and landscapes are protected as cultural heritage by the Act on the Protection and Preservation of Cultural Property (OG 69/99, 151/03, 157/03, 100/04, 87/09, 88/10, 61/11, 25/12, 136/12, 157/13, 152/14, 98/15, 44/17, 90/18, 32/20, 62/20, 117/21, 114/22) - further in text Act on Cultural Heritage. Competent authority is Ministry of Culture and Media. Among other, this Act defines types of cultural property and protection and preservation of cultural heritage. The Ministry of Culture and Media, based on official decision, determines the cultural heritage, and defines protection measures and the obligation to sign in the Cultural Heritage Register. In the Cultural Heritage Register of the Ministry of Culture and Media it is possible to check whether a certain building/area/item is protected as a cultural heritage: <https://registar.kulturnadobra.hr/> This information can also be requested from the Conservation Department of the Ministry of Culture and Media (conservation departments are organized by counties). In the case that certain property of local significant is not determinate under protection as a cultural property (as defined by Act on Cultural Heritage) a representative body of the county, City of Zagreb or municipality may declare it as a protected, if it is located in their territory. Protection of the cultural heritage is also part of physical planning process and building permitting process, regulated by Construction Act and Physical Planning Act. According to Act on Cultural Heritage for work performance on cultural heritage, it is necessary to obtain prior approval from the competed body (Ministry of Culture or County/City CH Department).

Obtaining prior approval is regulated by the Ordinance on Documentation for Prior Granting of Works on Cultural Property (OG 134/15). Obtaining this approval is an integral part of the location and building permitting processes. It is also necessary to obtain this approval for interventions that can be performed only on the basis of the main project or without main project. For projects/interventions for which location permit is required, for the purpose of conceptual design preparation, the competent body, at the request of the competent body for issuing location permit, determines special conditions for protection of cultural heritage. Special conditions established for the purpose of making the conceptual design can be used to prepare the main design required for the issuance of a building permit. During the building permitting process, the compliance of the main project with special conditions (i.e. special conditions for protection of cultural heritage determined by location permit) are checked and certificate that the main project is prepared in accordance with the special conditions for the protection of cultural heritage must be issued. For complex interventions on cultural heritage for which it is necessary to conduct preliminary research and / or assessment of the impact on cultural heritage the competent authority is authorized to determine the special conditions in a form of conservation study. For the construction of simple and other buildings and works within the cultural-historical entity/area, on an individual cultural property, as well as works in the area within the boundaries of the cultural property, which can be performed without location / building permit, in accordance with the main design, before commencement of the work it is necessary to obtain special conditions for the protection of cultural heritage. For the projects/interventions that can be performed without location/building permit and without main design it necessary to obtain prior approval from the competent body (if necessary competent body will determine special conditions). Prior approval is also issued for: conservation, restoration, relocation of cultural heritage and other similar works, conservation Department of the Ministry of Culture and Media, and for the City of Zagreb the City Institute for the Protection of Cultural and Natural Monuments in Zagreb more complex intervention is an intervention that refers to several developmental historical layers of a building (construction and stylistic) that are not visible in the existing condition or it is an intervention on a building made by complex application of several different materials, which is not documented to protect and preserve cultural heritage under Act on Cultural Heritage. Simple and other construction works and works defined by Ordinance on simple and other construction works and works (OG 112/17, 34/18, 36/19, 98/19, 31/20). Works that can be performed: a) without location/building permit and without main design, b) without location / building permit, in accordance with the main design / standard design, c) in the event of construction damage when people and assets are directly in danger, without building permit construction can be restored to the original condition in line with the act according to which it was built or the by project of the existing condition operation of industrial and other facilities and sites, rehabilitation and adaptation of cultural heritage etc.

Protection of landscape

No specific law or regulation/ordinance that regulate landscape issues were adopted in Croatia. Some sectoral approaches, such as the protection of cultural heritage and protection of nature and the environment, partly include landscape issues, while spatial planning is recognized as a common and integrative instrument of its protection. Integrated approach and an important degree of landscape protection in Croatia has been formally established by the Acceptance of the European Landscape

Convention Act (OG 12/2002). Legal protection of the landscape, aligned with the EU Environmental Acquis as the rest of the national legislation, is also covered by: Physical Planning Act (OG 153/13, 65/17, 114/18, 39/19, 98/19), Environmental Protection Act (OG 80/13, 153/13, 78/15, 12/18, 118/18), Nature Protection Act (OG 80/13, 15/18, 14/19, 127/19), Act on the Protection and Preservation of Cultural Property (OG 69/99, 151/03, 157/03, 100/04, 87/09, 88/10, 61/11, 25/12, 136/12, 157/13, 152/14, 98/15, 44/17, 90/18, 32/20, 62/20, 117/21, 114/22). Three Ministries: Ministry of Economy and Sustainable Development, Ministry of Culture and Media and the Ministry of Physical Planning, Construction and State Assets are responsible for landscape care. The spatial planning system is the main tool for landscape conservation. Spatial planning documentation includes landscape issues.

Main obligations deriving from national social legislation.

The right to equality and non-discrimination is a fundamental human right protected by the Constitution of the Republic of Croatia and other legal acts such as the Constitutional Act on National Minorities Rights, the Labor Act, the Gender Equality Act and the Anti-discrimination Act, Foreigners Act. Fundamental obligations and rights arising from employment relationships and principles of prevention and occupational safety rules are stipulated by the Labor Act and Occupational Safety Act. Labor Act manages relationship between parties involved in the process of employment. It protects and applies to any physical person that has concluded an employment contract with an employer. Fundamental obligations and rights arising from employment relationships are stipulated by the Article 7 of the Labor Act. This Article defines that the employer shall be obliged to ensure work for an employed worker and pay remuneration for the work performed, and the worker shall be obliged to complete the work following the instructions provided by the employer in line with the nature and type of work. Furthermore, according to paragraph 2, the employer shall be entitled to determine the place and the manner of performing the work and shall respect the workers' rights and dignity. Paragraph 3 outlines that the employer shall be obliged to ensure safe working conditions with no detrimental effects on the health of the worker, following a special law and other regulations.

The national policy, principles of prevention and occupational safety rules, obligations of the employer, rights and obligations of workers, including supervision and misdemeanor liability in the Republic of Croatia, are regulated by the Occupational Safety and Health Act. The Act defines measures to protect workers from psychosocial risks (stress) and psychophysiological effort at work, for the Conservation with the aim of prevention and education of all stakeholders. The Act sets out the general principles of risk prevention at work and protection of health, rules to eliminate risk factors, procedures of training of workers and procedures of information and consultation of employees and their representative with employers and their authorized persons. The intention is to raise awareness and encourage preventive action not only by employers but also by employees. The employer is obliged to implement occupational health and safety measures based on the general principles of prevention. These include risk avoidance, risk assessment, prevention of risks at their source, adjustment of work to the employees in relation to the design of the workplace, the choice of work equipment and the mode of operation and work processes to relieve monotonous work. Employers must consider issues such as adaptation to technical progress, replacing hazardous substances or processes with the non-hazardous or less hazardous. They are also required to develop a consistent comprehensive prevention policy by connecting technology, organization of work, working conditions, human relationships, and the

influence of work environment. They must give preference to collective protective measures over individual ones, appropriately train and inform employees, and make all protective equipment available free of charge. The Ordinance on the Occupational Health and Safety on Temporary Construction sites (OG 48/18) defines measures and activities for the protection of workers on temporary construction sites. For example, requirements for evacuation roads and emergency exits, fire detection, sanitary equipment and first aid, etc. are defined by this Ordinance. The occupational safety rules apply to all project phases from design to implementation. The investor is the first of the stakeholders of the occupational safety and health system when it comes to the design, construction, and use of constructions. Because of that he is obliged to apply general principles of prevention and occupational safety rules at all stages of project design and preparation. Accordingly, during the design preparation, study on safety at work should be prepared. This study should elaborate the manner of applying the occupational safety rules when using buildings intended for work. When preparing the main project and during the construction works responsible person for occupational health and safety must be appointed (by investor, building owner, concessionaire etc). Pursuant to Article 74, paragraph 3 of the Occupational Safety and Health Act, the contractor of works on a temporary construction site is obliged to submit a site registration to body competent for labour inspection (State Inspectorate), at the latest one day prior to the commencement of the works (for Temporary construction site is any work place where construction and other works are performed and whose incomplete list is given in Annex I. of this Ordinance 71 especially dangerous works defined in Annex II of the Ordinance and if the duration of works is longer than 10 days). The content of site registration is defined in Annex III of the Ordinance. Copy of the site's registration must be available at the construction site in a visible place. Registration of the construction site, where the works will be carried out by two or more contractors, is the obligation of the investor, concession holder or other person for which the construction works are performed. The contractor who performs the construction works is obliged to arrange the site and to ensure that the works are carried out in accordance with the occupational health and safety regulations. It is therefore necessary to prepare Construction Work Plan. The content of Plan is defined in Annex IV of the Ordinance. The Construction Work Plan must be available at the construction site, and its preparation is obligation of the investor, concessionaire, or other person for whom the construction works are performed. If only one contractor performs construction works, then he is not obligated to prepare Construction Work Plan, and only must send notification to the State Inspectorate.

The Republic of Croatia has ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182). Working hours, the Labor Act in chapter 8 defines the working time, starting with the definition of working time (Article 60), while Article 61 stipulates that full-time work shall not exceed 40 hours a week. Articles 66 and 67 define the flexibility of working time. Thus, the duration of workers' working time may be evenly or unevenly distributed over days, weeks, or months. Therefore, where working time is unevenly distributed, its duration may in one period be longer than full-time work or part-time work, and shorter in another. Laws and regulations define the patterns of working time, collective agreement, agreement between the works council and the employer, working rules, or employment contract. Rest breaks and vacations are also defined by Labor Act. Daily break is defined by the Articles 73 and 74, while Article 75 regulates a weekly break period. According to these Articles the worker who works at least six hours a day is entitled to a daily period of

rest (a break) of a minimum of 30 minutes. The part-time worker or two or more employers with total daily working hours at all employers of at least 6 or 4.5 hours is entitled to a break at each employer proportionate to his contracted part-time work. The rest period is counted in working time. The worker is entitled to a minimum daily rest period of 12 consecutive hours per 24-hour period; a weekly minimum uninterrupted rest period of 24 hours plus the hours of regular rest; and the minor is entitled to a weekly minimum continuous rest period of 48 hours. The rest must be used by the worker on Sundays or the day before or day after Sunday. Where the worker is not in a position to use the rest period as previously mentioned, he or she must be afforded equivalent periods of compensatory weekly rest right after his working time with no weekly rest, or with a shorter period of rest. As an exception, the shift workers or workers who due to 72 objective reasons or organization of work cannot use the rest period must be afforded a weekly minimum uninterrupted rest period of 24 hours, without counting the daily rest. Remuneration and compensation are regulated by Article 90-97 of the Labor Act. According to Article 90, the employer is obliged to calculate and pay remuneration to the worker in the amount provided through law, collective agreement, working regulations, or employment contract. The Article 91 regulates equal pay for women and men, while the Article 94 stipulates that the worker has a right to an increased remuneration for arduous working conditions, overtime, and night work, and for work on Sundays, holidays, and on other days that are not working days according to the law.

The Labor Act in Article 7 in paragraph 4 prohibits any direct or indirect discrimination in labour and working conditions, including the selection criteria and requirements for employment, advance in employment, professional guidance, education, training, and retraining. The employer is also obliged to protect the workers' dignity during the work in case of acts, uncalled for and contrary to the Labor Act and special legal provisions, of superiors, collaborators, and persons with whom the worker contacts regularly while performing his tasks. The Articles 31-32 define prohibition of discrimination of pregnant workers, women who have recently given birth or are breastfeeding, while the Article 39 vetoes discrimination regards advance in employment or the exercise of other rights. Some other forms of discrimination are any not allowed by the Labor Act: prohibition of discrimination of the members of the works council (the Article 157-158); and discrimination on the ground of membership or non-membership in an association or participation or non-participation in various activities (the Article 166).

The Labor Act includes provisions that allow workers to resolve disputes in cases where there is a disagreement between the employer and the employee over the essential terms of conditions of a labor agreement and other aspects of work. Such disagreement will be resolved in compliance with the procedures. Reference Collective Agreement for Construction (OG 115/15, 26/18, 93/20, 104/20, 94/22) in the section on protection of workers (Article 70) stipulates that a worker who believes that an employer has violated his right from employment may, within 15 days from the delivery of the decision violating his right, or from the day of finding out about the violation of the right, demand the right to be consumed. Written decisions on the consummation of the rights and obligations of the worker are delivered directly to the worker or delivered by registered mail to the last address reported by the worker to the employer. The employee is obliged to inform the employer immediately in case of change of address. If the Employer's letter addressed to the worker at the address reported to the employer by the employee is returned undeliverable due to the refusal of receipt or the unknown or incorrectly

reported address, it shall be posted in writing on the notice board at the premises of the employer, and the contracting parties agree that this is a proper delivery to the worker performed. Furthermore, notwithstanding the procedure for the protection of rights referred to in Article 70 of the Collective Agreement, an employee who considers that he or she has been unfairly treated by other worker, associate or management of the company may appeal on him or her to a superior employee or management of the company and may apply for mediation and the works council.

Gender equality

Gender equality is first guaranteed by the Constitution of the Republic of Croatia, and then developed further in the Gender Equality Act. Provisions on gender equality are also found in other laws, such as the Anti-Discrimination Act (2009), the Labour Law (since 1995), the Law on Same-Sex Communities (2003) (repealed by the Law on Life Partnership of Persons of the Same Sex (2014)), the Law on Elections of Representatives to the Croatian Parliament, the Law on Local Elections and the Law on Protection from Domestic Violence (since 2003).

In 2003, upon the proposal of the Croatian Government, the first ombudsperson for gender equality was appointed by the Croatian Parliament in accordance to the Gender Equality Act adopted in 2003 for the first time (Official Gazette 116/03).

Anti-Discrimination Act

At the national level, the Anti-Discrimination Act ensures the protection and promotion of equality as the highest value of the constitutional order of the Republic of Croatia. The Act defines, inter alia, the concept of discrimination, forms (direct and indirect discrimination, harassment and sexual harassment, incitement to discrimination, failure to provide reasonable adjustment and segregation), scope, judicial protection mechanisms, the jurisdiction of the Ombudsperson as the central body for combating discrimination and of special ombudspersons, and a significant instrument of shifting the burden of proof from the plaintiff to the defendant. The law defines discrimination as putting at a disadvantage any person as well as a person associated by kinship or other ties on the basis of some of the explicitly stated discriminatory grounds, as well as on the basis of a misconception of the existence of any of the grounds, without being one of the situations covered by the exceptions specified in the Act. In addition to the institutional and procedural forms of protection, as prescribed by the Law, it is especially emphasized that in the Republic of Croatia discrimination is prohibited in all areas of life and that it is forbidden to discriminate against everyone. The aforementioned Act provides protection against victimization according to which no one should be put in a disadvantaged position because they have reported discrimination in good faith, attended discrimination, refused an order for discriminatory treatment or in any way participated in a procedure conducted for discrimination.

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"².

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

Additionally, 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.

4.3 World Bank Standards and Key Gaps with the National Framework

The project will follow the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, development of

² <https://vlada.gov.hr/access-to-information/15017>

formal E&S protection system and Project management capacity, the environmental and social risk of the project is categorized as moderate.

Environmental risk category is categorized as moderate. The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the project activities are neither complex nor large, do not involve activities that have a high potential for harming people or the environment, and it is expected that the chosen location will be far from environmentally sensitive areas. As such, the potential risks and impacts are (i) predictable and expected to be temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the project; and have (iv) low probability of serious adverse effects to human health and/or the environment. Routine safety precautions are expected to be sufficient to prevent impacts on human populations and/or the environment.

The Social risk for the Project is assessed as moderate. The primary social risk of the Project are related to potential disputes that could arise when carrying out cadaster survey and land registration activities if overlaying claims on property and land arise, involuntary land acquisition and changes in land use for construction of judicial infrastructure in Novska, Rijeka, Velika Gorica and Bjelovar, barriers to access for land justice services faced by certain vulnerable groups that could be further exacerbated by moving to digital delivery, potential overlap in use of entries / exits and corridors of prisoner and justice users at the Bjelovar Court, community health and safety risks related to civil works, labor risks for direct, contracted and primary supply workers related to OHS, terms of employment and potential discrimination of migrant workers

As a member of the European Union, the Republic of Croatia has harmonized its environmental regulations and standards in line with EU directives. It can be concluded that the environmental regulations are in general in line with WB safeguards and policies. Several differences between national legislation and WB ESS were identified, regarding ESS1, ESS3, ESS5 and ESS10. In relation to social impacts, the Croatian legislation is in line with WB safeguards and requirements in terms of human health and safety, public consultation, or provisions for addressing the relation and impact of the project to neighboring properties and communities. National legislation is in compliant with all ESS2 prescriptions, and no differences have been identified. Detailed information on relation between ESSs and national legislation are given below.

Table. Relevant World Bank ESS and Key Gaps with the National Framework - preliminary overview

E&S Standard	Relevance
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	According to ESS1 Borrower must conduct environmental and social assessment of all projects proposed for Bank financing to help ensure that projects are environmentally and socially sound and sustainable. Croatian legislation defines different mechanisms for environmental assessment of projects. The environmental legal, regulatory and policy framework in Croatia is ensured through the following main instruments:

	<p>Environment Impact Assessment, Location and Building permitting process (opinion of competed authorities for meeting environmental conditions has to be issued as a part of permitting procedure, e.g. for water protection, protections of cultural heritage, etc.), Physical Planning (preparation of physical plan is subject of strategic environmental assessment). Although for certain projects/interventions legally is not specifically required to conduct procedure of environmental assessment, assessment is at least partly ensured by application of these mechanisms (elimination and/or mitigation of possible negative environmental and social impact from a planned project is ensured). However, the aforementioned instruments are not covering all areas of ESF concern (e.g. indoor air quality) while instruments such as ESMP and ESMP Checklists are not required under the national E&S system. Maybe the weakest spot in the national regulation is monitoring and reporting that does not exist on a predetermined/planned regular basis, but it is rather ad hoc (especially in practice).</p> <p>Environmental and social assessment national and WB instruments cannot be directly compared, and alignment and application of these instruments have to be checked for every project/sub-project.</p> <p>ESS1 is risk-based, unlike EIA Regulation that is largely process based and triggered predominantly by thresholds and types of interventions.</p>
<p>ESS2: Labor and Working Conditions</p>	<p>There is no gap on the labor policy level.</p>
<p>ESS3: Resource Efficiency and Pollution Prevention and Management</p>	<p>For hazardous waste management according to ESS3, waste owner must obtain documentation on handing over waste to the final destination. National legislation does not define such an obligation. Waste owner decides voluntarily whether to be provided with information on the final destination.</p> <p>According to the national legislation owner’s responsibility ceases when waste is handed over to the authorized company. If authorized company is waste collector which is a common case, and if waste owner does not request this information, the final destination will be unknown. However, the law requires that hazardous waste is appropriately stored/landfilled/processed by authorized companies. There may also be differences in requirements of WB EHS Guidelines and national and supranational (e.g. EU BREFS) emission and E&S management requirements. Therefore, all these WB and national system relevant guidelines must be consulted while stricter one applied.</p>
<p>ESS4: Community Health and Safety</p>	<p>There may be differences in requirements of WB EHS Guidelines and national and supranational (e.g. EU BREFS) emission and E&S management</p>

	requirements. Therefore, all these WB and national system relevant guidelines must be consulted while stricter one applied. Assessment of Life and Fire safety alignment was not carried out.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Overall, the national legislation reflects the provisions of the Bank’s ESS5 however, there are some differences to be noted. Under national legislation, the emphasis is put on the definition of formal property rights and on how the property acquisition for public purposes is to be implemented and compensated whilst for ESS5 lack of title should not be a bar to compensation and rehabilitation measures as economic rehabilitation of all affected people needs to be addressed (including those who do not have formal legal rights on assets and those who have no recognizable legal right). Also, national legislation requirements on public consultations and participation for acquisition of privately owned land by the State in the public interest require only notification to affected landowners. Only in case of expropriation of many properties (more than ten) and several property owners (more than ten), the beneficiary of the expropriation is obliged to submit proof of the announcement of the offer to the property owners. According to the provisions of ESS 5 the Borrower should engage with affected communities through the process of stakeholder engagement described in ESS10. Disclosure of relevant information and meaningful participation of affected communities and persons should take place during the consideration of alternative project designs, and thereafter throughout the planning, implementation, monitoring, and evaluation of the compensation process, livelihood restoration activities, and relocation process.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	This Standard is not relevant as the project activities will have no negative impact in terms of biodiversity conservation or on protected areas.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	This Standard is not relevant. Croatia does not have distinct ethnic, social and/or cultural groups as covered by ESS7. Thus, this standard is not relevant
ESS8: Cultural Heritage	There is no gap at the policy level. Preliminary assessment points out that there is a gap in treatment of intangible cultural heritage. There may also be a gap in monitoring and reporting requirements.

ESS9: Financial Intermediaries	<p>This Standard is not relevant.</p> <p>This standard is not applicable as the project does not envision involvement of financial intermediaries.</p>
ESS10: Stakeholder Engagement and Information Disclosure	<p>According to national legislation, preparation of SEP is not required.</p> <p>Although the procedures related to public information disclosure and grievance mechanism in the process of EIA are comprehensively and in detail covered by national legislation and in line with ESS10 requirements, the preparation of program like SEP for specific project is not required by national legislation.</p> <p>As it is mentioned, public consultation and engagement is covered in national legislation, including the right to address petitions, request information on projects carried by public bodies, consultation of neighbors and communities, etc.; however, the processes for reaching potentially impacted persons and communities also can be improved to incorporate WB principles, by engaging actively with these persons/groups, especially with vulnerable groups where such situations will surface. According to national legislation public consultation process is a part of EIA procedure and is not conducted for every project/sub-project. Public consultations of other E&S instruments are not regulated or required.</p>

5. POTENTIAL ENVIRONMENTAL AND SOCIAL RISK IMPACTS AND STANDARD MITIGATION MEASURES

5.1 Environmental risks and impacts

The impact on the environment is expected from the execution of civil works through the implementation of the component D: Integrated Court, LRO and CO Infrastructure. The implementation of the component D 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 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.

Risks related to Component A include (i) generation of large amounts of waste documents (potentially recyclables) and their processing or landfilling; OHS risks related to management of old documents and working in insufficiently aired, dusty and potentially mold-contaminated facilities (e.g. basement repositories/archives). Under Component C (and possibly A) purchase and installation of larger amounts of IT equipment (e.g. servers) may be required, with potential implications related to electrical and electronic waste (EEW) of equipment, heat production in use phase and energy consumption (for work, cooling, etc.).

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** (including pesticide-contaminated soil), **seismicity**;
- **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.
- **OHS related risks**
- **Climate change and climate change resilience** related risks.

Expected environmental impacts under Component A and C are:

- Generation and management of wastes (electrical and electronic waste and disposed documents).

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, as explained in text below.

Overview of Key Mitigation in Design Phase

According to the national legislation all civil works must be designed and built in such a way that it, throughout its life cycle, they: have no threat to the hygiene or health and safety of workers or neighbors; have no exceedingly high impact on the environmental quality or on the climate during its construction; allow no leakage of toxic gases, emissions of dangerous substances, volatile organic compounds, greenhouse gases or dangerous particles into the air, emission of dangerous radiation; allow no release of dangerous substances into ground water, marine waters, surface waters or soil, release of dangerous substances into drinking water or substances which have an otherwise negative impact on drinking water, discharge of untreated waste waters, emission of flue gases or faulty disposal of solid or liquid waste; allow no shortcomings in parts of the construction work or on surfaces within the construction work.

This means that all civil works must be designed and conducted in such a way that do not present unacceptable risks of accidents or damage in service or in operation such as slipping, falling, collision, burns, electrocution, injury from explosion, burglaries, etc. In particular, must be designed taking into consideration accessibility and use for disabled persons. Regarding noise protection, noise perceived by

the workers or people nearby has to be kept to a level that will not threaten their health and will allow them to sleep, rest and work in satisfactory conditions. Additionally, construction works must be energy-efficient, using as little energy as possible and conducted in such a way that the use of natural resources is sustainable. Appropriate OHS measures will be incorporated into the design to prevent and protect workers from occupational injuries and illness.

Fire protection in Croatia is designed and implemented within a strong institutional and regulatory framework diligently enforced by the Ministry of Interior, Directorate for Fire Protection, and in line with the primary regulation being the Regulation on Fire Resistance and Other Requirements that Buildings Must Meet in Case of Fire (OG 29/13, 87/15). For aspects such as the calculation of fire compartment areas, fire load, the need for the introduction of certain systems, and other not regulated by the Regulation on Fire Resistance(...) or other Croatian regulations, well recognised and accepted international standards are applied (such as Österreichisches Institut für Bautechnik OIB, British Standard (BS), National Fire Protection Association (NFPA), etc.) and in line with WB EHS. Design and implementation of applied standards must be aligned to EU fire protection standards, that are also the national standards.

Construction sub-projects in Component D will also consider the following environmental risks in the preparation (design) phase:

- **energy efficiency** - increasing energy efficiency of buildings in line with Technical regulation on rational use of energy and thermal protection in buildings (OG 128/15, 70/18, 73/18, 86/1, 102/20) and selection of energy efficient appliances (minimally category B in accordance with EU Directive 92/75/EC established an energy consumption labelling scheme),
- **water use efficiency** - increasing water efficiency in line with requirements of Decision of Croatian Waters, by e.g. use of tap aerators, sensors, dual flush, storm water collection and use, also WB GIIP for water management. If possible, water will be harvested and used for adequate purposes (flushing, cleaning outside surfaces, watering plants and lawns, etc.),
- **light pollution** – this risk will be minimized by following Protection from Light Pollution Act (OG 14/19) regulates the principles of protection, the entities that implement protection, the method of establishing lighting management standards for the purpose of reducing the consumption of electricity and other energy and the mandatory methods of lighting, and measures to protect against excessive lighting are established, restrictions and prohibitions related to light pollution, planning of construction, maintenance and reconstruction of lighting, and responsibility of manufacturers of lighting products. Lighting will be designed to comply with best practices and minimize light pollution, both in design of appliances as well as number of installed appliances, micro locations, etc.
- **climate change abatement and resilience** through choice of energy efficient and low carbon consumption heating and cooling systems, application of DNSH (Do No Significant Harm) principles: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to the circular economy, including waste prevention and recycling, prevention and reduction of air, water and soil pollution. In addition, the design of the building, greening and landscape will recognize other opportunities to address climate changes resilience such as choice of building elements colors (especially the façade), distribution of rooms and technical rooms, shading,

type and height of greenery, water collection design, etc. This will be done without compromising safety.

- **earthquake resistance of buildings** will be addressed through application of EU standard Eurocode 8: Design of structures for earthquake resistance. EN 1998 Eurocode 8 applies to the design and construction of buildings and other civil engineering works in seismic regions. Its purpose is to ensure that in the event of earthquakes (i) human lives are protected; (ii) damage is limited; and (iii) structures important for civil protection remain operational.

Overview of Key Mitigation in Implementation Phase

Air pollution

Emissions to air can be reduced to minor levels or eliminated through standard practices of good site management, such as water sprinkling to limit dust emissions in the area near the construction materials and non-asphalted roads, covering of surfaces with plastic coverings during material storage and transportation, limiting vehicles speed in the area and access roads, periodical cleaning of location and access roads, efficient use of modern attested construction machinery to minimize emissions, provided with mufflers and maintained in good and efficient operation condition. To minimize dust (mainly PM10) adequate locations for storage, mixing and loading of construction materials should be established. Material collection, material retention time at the site should be reduced to a minimum, in order to minimize exposure to wind. There may be dust emissions taking place during documentation management, in this case the potential impact can be mitigated through diligent application of OHS measures.

Emission of noise

To remove/mitigate noise pollution emission of noise must be in compliance with legally defined limits under the Noise Protection Act (OG 30/09, 55/13, 153/13, 41/16, 114/18, 14/21). The permitted equivalent noise level of the construction site is 65 dB(A). In the period from 08:00 to 18:00, it is allowed to exceed the equivalent noise level of an additional 5 dB (A). It is desirable to carry out works in the period from 8 to 18 hours and not to carry works during the nights. Community / public should be informed in advance of any work activities to occur outside of normal working hours or on weekends. All equipment must be maintained in good operating condition and be attested. During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible.

Surface or ground water pollution

Surface or ground water pollution can be prevented by proper organization of construction site, by regular maintenance of vehicles and machinery in service centers outside the site locations and responsible handling of liquid waste. Adding oil activities should be carried out on the part of the construction site that is derived from an impermeable working surface. In the case of an accident, any hazardous liquid should be removed from the soil using adsorption materials such as sand, sawdust or mineral adsorbents. Such waste material should be collected in tanks, stored in the space provided for hazardous waste storage and handed over to licensed companies. The probability of this negative impact also can be reduced by preventing hazardous spillage coming from tanks, containers (mandatory

secondary containment system, e.g. double walled or bunded containers), construction equipment and vehicles (regular maintenance and check-ups of oil and gas tanks), by parking (manipulate) machinery and vehicles only on asphalted or concrete surfaces with surface runoff water collecting system. The design must resolve the surface runoff in a way that prevents localized flooding.

Soil pollution and/or erosion

Possibility of soil pollution or erosion can be reduced by regular maintenance and servicing of machines, by avoiding fuel and lubricant storage on site and by adhering the measures and standards for construction machinery. If installation of fuel storage tanks will be needed, they should have secondary tanks with sufficient volume to contain a spill from the largest fuel tank in the structure. The containment area will have a device (pump) to remove accumulated water. If identified, soil erosion and landslides will be prevented through risk-based use of screens, geonets, gabions, greening, application of concrete, etc. Management of pesticide-contaminated soil has to be done in accordance with national health and safety and waste management legislation, WB EHS and GIIP. It is also necessary to determine limitations in the further use of the polluted site.

Generation and management of wastes

Each type of generated waste on the location has to be temporary stored in separate waste container which have to be labelled with waste type name and waste code and located at the solid surface foreseen for that purpose on the construction site. Construction waste has to be disposed exclusively in the designated locations (licensed landfills). The final destination of all waste will be determined and recorded while records of all waste flows must be kept.

Management of hazardous materials, EE waste and disposed documents

Management of hazardous waste (asbestos waste, waste electrical and electronic equipment) has to be done in accordance with national health and safety and waste management legislation, WB EHS and GIIP. Final waste disposal has to be done by licensed waste management companies of which records will be kept. EE waste should be separated from mixed municipal waste and from other types of waste and managed in accordance with Ordinance on waste electrical and electronic equipment management (OG 42/14, 48/14, 107/14, 139/14, 11/19, 7/20).

Disposed documents should be managed in accordance with national health and safety and waste management legislation. It should be separated from mixed municipal waste and from other types of waste with the aim of recycling if possible. Management of dusty waste paper in potentially mold-contaminated facilities must comply with national health and safety and waste management legislation, WB EHS and GIIP.

Traffic disturbance

Traffic management must be conducted in accordance with provisions of traffic legislation (e.g., appropriate lighting, traffic safety signs, barriers and flag persons that are seen easily or are easy to follow, road speed should be clearly posted, safe pedestrian corridors will be ensured). Transport should be avoided on access roads during rush hours.

Cultural and historical heritage

Procedure for chance findings and protection of cultural and historical heritage is legally defined in the regulatory framework and supervised by competent authorities (Ministry of Culture and its regional and local departments, county and municipal offices) and must be applied. If during construction works some archaeological finds are encountered, works have to be stopped immediately and the competent authority informed. Works will resume only after appropriate measures have been taken as required by relevant authority and after it confirms that works may continue. In the case sub- project is carried out in the protected facility or culture protected zone, Cultural Heritage Management Plan satisfactory to WB will be prepared as a part of environmental assessment document (ESMP or ESMP Checklist) or as a stand-alone document. CH management shall be also guided by ESS8 and GIIP.

Impact to nature

To protect biodiversity the movement of heavy machinery has to be restricted to the road corridor. Handling of equipment and machinery have to be professional and careful to try to break out accidents such as fires or spills of large amounts of harmful substances into the environment, and thus adversely impact on the present flora and fauna.

Work along watercourses and on watercourses and canals should be limited to as small an area as possible. It should be avoided, where possible, cutting of trees and other natural vegetation. In the case of removing vegetation, to prevent unnecessary loss of vegetation in the project area it is necessary to clearly mark the areas where vegetation will be removed. For the restoration of the removed natural vegetation cover, only autochthonous plant species that occur in the vegetation communities present in the wider area of the sub-project should be used.

It is desirable that the potential removal of vegetation is planned for the period when birds do not nest. All birds that nest they need to protect until their birds can fly. In case of finding the nests of endangered bird species, their disturbance should be prevented, and the central state body responsible for nature protection informed about the discovery.

Where possible, the area under construction/reconstruction has to be fenced to lessen even occasional disturbance and dust on habitats and biodiversity. If noise barriers need to be constructed, they should be opaque or with a design and density of stickers that will prevent birds from entering the barriers as much as possible. Natural 2000 Network and PA management plans will be consulted and taken into account in environmental assessments and prescribing mitigation measures. If risk is identified, works will be designed to avoid breeding and other important periods of vulnerable and endangered wildlife, if any is present in the area. Biodiversity protection measures will address site- specific issues and be integrated to sub-project ESMPs and ESMP Checklist.

OHS related risks

OHS risks typical for civil works are expected and if properly managed (in accordance with the positive national legislation) and WB EHS and GIIP they are not to produce significant risks.

Measures relating to OHS are aimed at protecting project workers from injury, illness or impacts associated with exposure to hazards encountered in the workplace or while working. Appropriate OHS measures will be incorporated into the design and implementation of the project to prevent and protect workers from occupational injuries and illness.

5.2 Social risks and impacts and mitigation measures

Social risks and impacts and mitigation measures for components A, B and C

For Components A, B, and C eventual social risks could arise related to the implementation of cadastral surveys 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). Overlaying claims on property and land could arise in the case of inheritance, family disputes, issues of land registration of claimants with no title and pending land claims from property seized during the Yugoslav Communist Government.

Those risks can be avoided, minimized, and reduced by tools already established by relevant national legislation pertaining to geodetic activities, such as the act on the Law on State Survey and Real Estate Cadaster. Then, they could be mitigated through Project ESF instruments and activities such as the implementation of the stakeholder engagement activities as defined by Project and relevant sub-project SEPs, as well as through establishment and operationalization of GRM.

Mitigation measures foreseen in relevant national legislation

The issue of compensating for the property seized during the Yugoslav Communist Rule in the Republic of Croatia has been governed by the Law on Compensating for the Property Seized during the Yugoslav Communist Rule. In cases in which requests of compensations are in areas under cadastral survey negative impacts are not likely to occur and are mitigated by the fact that these are separate procedures defined by laws and bylaws (i.e. during survey it is noted that the property is under compensation procedure). Cadastral data describing cadastral parcels can only be changed on the basis of a geodetic study and an administrative decision issued by the CO. The decision is made according to the rules of the administrative procedure, and for any change of data that changes data on cadastral parcels, the registered right holders must be notified by delivery of that decision, and only after it becomes effective, the CO can change the data in the cadastral operation. The CO for the registration of owners in the land registers also issues an administrative decision, and the change will be made according to the rules as stated in the case of data changes on cadastral parcels. Owners can be registered in title deeds also based on the decision of the land registry department ex officio. The CO will not inform separately about this, because the interested parties have already received the decision from the land registry department. Buildings and other structures are registered in the cadaster plot. Recording and changing data on buildings and other structures in the CO can only be done on the basis of the geodetic plan and the administrative decision issued by the CO in the manner already described. A corresponding act of use can be attached to the report. To change the method of use of a cadastral plot, in addition to authorized geodetic companies, it is possible to contact the CO, where the cadastral officers go out for a field survey and prepare the corresponding geodetic study.

When real estate (parcels of the land surface, cadastral parcels) entered in the cadaster and land book do not correspond to the actual condition on the ground, this condition can be changed on the basis of the corresponding geodetic study. Given that, due to various social and historical reasons, this mismatch is present in larger areas, the State Geodetic Administration and the Ministry of Justice have launched

an extensive program of arranging the cadaster and harmonizing it with the actual situation on the ground. The basis of this program are cadastral surveys. Given that the cadastral survey is being carried out for an area, all interested parties in that area must be informed about its implementation. The decision on the cadastral survey is made by the director of the State Geodetic Administration and that the decision must be published in the Official Gazette. In addition to the above, information on the implementation of the cadastral survey is also published in local newspapers. In all local self-government units, in the area where the survey is carried out, public meetings of citizens are held where the procedure of the new cadastral survey is explained to interested persons and instructions are given for marking land boundaries with visible permanent (boundary) marks. At the main road entrances to the area under survey, boards are placed to mark the work site. When a cadastral survey is carried out in a cadastral municipality, the holders of the rights to the land are obliged within the period determined by the Decision on in the cadastral survey to mark, with permanent markings visible and at their own expense the boundaries of the land on which they have the right of ownership, other rights or which they manage. Holders of the right to commemoration are invited in writing. When all the necessary data are collected and processed by the cadastral survey, the cadastral survey report is prepared. Collected and processed data are exposed to public inspection. The public inspection of cadastral data is carried out by the commission of the State Geodetic Administration at the same time and related to the establishment or renewal of the land registry, which is performed by the commission of the land registry department of the competent municipal court. Cadastral data collected and processed within the framework of the cadastral survey, with a written invitation, are presented to the persons who, in the elaboration of the cadastral survey, are stated as holders of rights to real estate, and these persons confirm by signature during the presentation process that the cadastral survey data have been presented to them and that they agree with the state of the collected data. Persons who do not agree with the state of the collected data can object to that state. Unfounded complaints will be rejected by a decision made in the administrative procedure, and an appeal against that decision is allowed. After the cadastral data has been presented to the party and the party agrees with this information, the party approaches the commission of the land registry department, which, based on the available documents and statements of the interested parties, compiles. After the commission of the State Geodetic Administration exposes all cadastral parcels for public inspection, and the commission of the land registry department of the municipal court compiles all land registry entries for a cadastral municipality, by the decision of the minister responsible for judicial affairs, the land register is opened, and by opening the land register, the correct procedure is opened according to Law on Land Registers. Obligatory procedures related to informing right holders about cadastral survey and to the presentation to public of data collected by cadastral survey with possibility to file objections are defined by the provisions of article 45 of the Law on State Survey and Real Estate Cadaster ad are precisely defined in the "Ordinance on exposure to public inspection of cadastral survey study OG 59/2020" (OG 59/2020).

The cadaster surveys provide free public procedure for settlement of previous disputes and improve legal certainty of land ownership. Other eventual claims on properties (such as the claims related to restitution of land from the Yugoslav era, family disputes, inheritance and any other issues of land registration that are not resolved within the cadaster survey) remain a separate procedure available to the citizens.

The above-described mechanisms that are part of relevant national legislation translate in a relatively low number of grievances and disputes during cadaster and land registry procedures. In 2022 of the total of land registry cases received across the Country only 0,27% were grievances / complaints. During the year 2022, 62.808 particles were exposed for public consultation and 146 complaints were filed against cadastral surveys/exposures. The number of complaints is small because, within the cadastral survey procedures, first instance grievances are expressed in front of a commission composed of, among others, representatives of local COs and courts, and are usually resolved immediately and on the spot. So, the complaints that are filed are the ones that were not addressed or resolved in the first instance.

To conclude, at this stage the exact locations of the cadastral survey that will be implemented within the scope of the Project are not known. The potential social risks that might arise will be limited and mitigated by the above-described mechanisms established by relevant national legislation. Furthermore, the Project will establish a grievance redress mechanism and implement related processes during the whole life cycle, with the aim to receive and facilitate resolution of concerns and grievances of project-affected parties. This, together with the implementation of stakeholder engagement processes, in line with project and sub-project level stakeholder engagement plans implemented and/or overviewed by the PIU social specialists, will improve accessibility of information, increase awareness among the stakeholders and establish two-way dialogue between affected and concerned stakeholders thus contributing to their empowerment, building trust and deterring future conflicts.

Social risks and impacts and mitigation measures for components D

Risks identified in relation to civil works activities in component D (construction of new integrated infrastructure in Novska, Velika Gorica, City of Rijeka and Bjelovar, including some small refurbishing works possible for 30 COs) are typical for construction activities: occupational health and safety (OHS) and community health and safety risks, labor management risks. Additionally, potential land use issues and involuntary resettlement issues can not be excluded. The civil works to be performed are small to medium in magnitude and as such the impacts can be easily and predictably mitigated by proper organization of construction site and continuous communication with all stakeholders and by developing specific tools foreseen in ESF.

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 routes 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, Philippines, 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 local residents when there are foreign workers living in the same building or in vicinity).

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 - consultants to perform specialized tasks (e.g. 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.

Child or forced labor

No instances of child or forced labor are likely to happen under the project as legislation on employment and labor are fully harmonized with the International Labor Organization (ILO) conventions (particularly ILO Forced Labor Convention No. 29 ratified by the Republic of Croatia) and the European Union Directives inclusive of convention on forced labor and convention on elimination of child labor and protection of children and young persons. Therefore, persons under the age of 18 will not be employed under the Project. Additionally, there is a long established practice and tradition in Croatia that prevents these risks.

Lack of adequate 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 will 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.

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. The location in Bjelovar is a publicly owned land in proximity of the existing Court (current yard and parking plot of the court) so there are no risks related to land acquisitions.

Conclusion

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 application of the WB ESF instruments and Environmental, Health and Safety (EHS) Guidelines, WHO guidelines and other good international industry practice (GIIP). As a result of E&S screening-proportional E&S instruments, based on adequate social assessment, will be developed. Labor management procedures (LMP) in relation to the requirements of national legislation and ESS2 will ensure adequate address of any potential risk regarding projects workers engagement, including potential sexual harassment (SEA/SH) risks. A Grievance Redress Mechanism (GRM), for receiving, evaluating, and addressing project-related complaints, feedback, questions and suggestions, at the level of the project and as well as respective sub projects, will be established. GRM will be set up in a way to ensure secure mechanism for lodging SEA/SH complaints. A separate GRM for grievances from project workers, including employees of contractors/sub-contractors will also be set up. Further tools foreseen in EES4 will be developed as needed given that the exact location of planned infrastructure investment in Rijeka and Velika Gorica are not known. For the two locations, at this point risks related to land acquisition, restrictions on land use and involuntary resettlement cannot be defined but also cannot be excluded so a Project Resettlement Policy Framework (RPF) is prepared and, if needed, followed by location-specific resettlement policy plans to satisfy the provisions of ESS5 and the requirements of national legislation. Along with Project SEP for each sub-project with investments in infrastructure, a dedicated stakeholder engagement action plan will be prepared, disclosed, and consulted.

4.1 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

Victims and witnesses

Victims and witnesses will benefit from the effort of the project (component D) to steer the design of the new court facilities toward international standards of service allowing for better court performance and user experience. This includes, if applicable, 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. Furthermore, the new infrastructure will improve working conditions of the civil society organizations included in the "Network of support and cooperation for victims and witnesses of criminal acts" or create the prerequisites for the establishment of departments for supporting victims and witnesses at county courts.

Within this vulnerable group a particular focus is given to the following subgroups that are addressed as specific vulnerable groups

- Victims and witnesses that are women
- Victims and witnesses that are children and minors
- Victims and witnesses that are low-income persons
- Victims and witnesses that are minorities

The group will be engaged through activities foreseen in project SEP as well as sub-projects SEPs that will be implemented during the whole life cycle, with the aim to assure accessibility of information, increase awareness among the vulnerable group, collect their needs and contribute to their empowerment. **Persons with disabilities**

In this context persons with disability are persons with permanent or temporary physical, mental intellectual and/or sensory impairments, which in interaction with various obstacles in the space can prevent their participation in society on an equal basis. This group will benefit from construction of court facilities (component D) as the detailed design (and thus the works) will be developed in line with the "Ordinance on ensuring the accessibility of buildings for people with disabilities and reduced mobility" (OG 78/2013) which prescribes the conditions and method of ensuring unimpeded access, movement, residence, and work for persons with disabilities and reduced mobility. Furthermore, the design of the court facilities will meet international standards of service allowing for better court performance and user experience - including fore persons with disabilities.

Persons with disabilities will benefit from the activities foreseen in Component A, B and C. The digitization and integration of cadaster, land registry, and court data will be performed taking into consideration website accessibility for the visually impaired in line with what is already in implementation. An example is the OSS portal that allows adjustments of the visuals for visually impaired and/or sensory impairments (through bigger font or contrast regulation) ad for persons with dyslexia. Improvement of digital services lowers the need to visit physically courts or COs avoiding the interaction of persons with disabilities with various obstacles in the space and improving their capacity to participate in society on equal basis. New cadastral surveys and land register establishment/renewal will be conducted to improve accuracy and corrections to cadaster and land registry records in

construction areas, which will provide citizens and landowners with clearer land rights horizontally, without negative effects for persons with disabilities.

Women

Victims and witnesses that are women: both women and men can be victims or witnesses but a particular focus is on women as they are most victims in cases of gender-based violence / offences. They will benefit from the effort of the project (component D) to steer the design of the new court facilities toward international standards of service. This includes best solutions for user access and public spaces through separate circulation where feasible and waiting 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. The group will be engaged through activities foreseen in project SEP that will be implemented during the whole life cycle, with the aim to assure accessibility of information, increase awareness among the vulnerable group, collect their needs and contribute to their empowerment.

Processing of cases that are more likely to impact vulnerable women: Related to supporting links between courts and land administration systems in cases that impact women (division of assets for divorce and inheritance, assessment of assets for child support, alimony and access to information on housing and addresses) the social services and courts are “power users” of the Real Property Registration and Cadaster Joint Information System (JIS) as they can access information on all registered assets of a person through his/her personal data (which is not possible for “normal” users / citizens).

In conclusion, activities of digitalization of land and court records, integration of digital services of official registries and spatial data and of further digital integration of Land registry and Cadastre have a potentially multiple positive effects for woman and other vulnerable groups like: saving time and consequently potential losing of earning due to absence from work by removing physical travel, paper documents, and long queues at government offices; speeding up the property division process during, for example, divorce proceedings or the division of property from inheritance, thereby reducing the risk of their economic poverty, GBV, and enhancing their economic independence and inclusion. Additionally, harmonization of parcels of the land surface and cadastral parcels that are entered in the cadaster and land registry with the actual condition on the ground significantly improves legal certainty of land ownership and thus increases the value of the land. An additional benefit of digital land administration and court services is opening space for improvement of other government sectors relevant for social issues by linking digitalized land administration and court services with other institutions, e.g. Ministry of Labor, Pension System, Family and Social Policy.

Children and minors

Children can participate in court proceedings, directly as defendants, victims or witnesses, or indirectly if the decisions significantly affect their lives. This may be the case in divorce or custody proceedings. They will benefit from the effort of the project (component D) to steer the design of the new court facilities toward international standards of service. This includes dedicated spaces and court equipment that meets the provision of national legislation allowing children to feel comfortable and safe to participate

effectively in proceedings. Components A, B and C will not have negative impact on this vulnerable group.

Low-income persons

Victims and witnesses that are low-income persons: Low income in the Republic of Croatia are entitled to free legal aid. The purpose of free legal aid is to achieve equality of all before the law, to ensure the effective exercise of legal protection and access to court and other public bodies. In general, this vulnerable group will benefit from the construction of new infrastructure D, that is from the improved working conditions of the civil society organizations included in the "Network of support and cooperation for victims and witnesses of criminal acts" or by newly created prerequisites for the establishment / improvement of departments for supporting victims and witnesses at county courts. Components A, B and C will have a positive impact on this vulnerable group, for the low-income residents of areas where cadastral surveys will be performed. Harmonization of parcels of the land surface and cadastral parcels that are entered in the cadaster and land book with the actual condition on the ground significantly improves legal certainty of land ownership and thus increases the value of the land. Furthermore, it is free for all residents of the area under survey and thus not constitute discrimination based on income.

Minorities

In general, this vulnerable group will benefit from the construction of new infrastructure in component D, that is from the improved working conditions of the civil society organizations included in the "Network of support and cooperation for victims and witnesses of criminal acts" or by newly created prerequisites for the establishment / improvement of departments for supporting victims and witnesses at county courts. Furthermore, component C that includes cadastral survey impact positively on this vulnerable groups. Examples of this contribution are cadaster surveys that were conducted in the past in the Međimurje County. In the past twenty years, large financial resources have been invested both from the World Bank and from the County budget with the aim to explore the spatial distribution of Roma-populated locations, develop urban planning of Roma populated locations and to develop a County program for the legalization of Roma populated locations. Creating conditions for urban planning of Roma-populated areas, and urbanization itself, has resulted in raising the quality of Roma housing. To consider the current situation and the starting point for the development of concrete, efficient and appropriate measures for its systematic improvement the CO in Čakovec and authorized geodetic companies performed, as a first step and a necessary prerequisite, the research of the spatial arrangement and condition of Roma locations, the size, number and condition of facilities, equipment, etc. Situational drawings, subdivision studies were made in accordance with county activity programs and urbanistic bases with the aim to improve the state of space and environment of Roma populated locations. Further steps include resolution of property-legal relations on the land. In the case of resolving the above on state-owned land, they are, if there are no obstacles, resolved by sale, direct bargain, assignment without compensation, allocation for use, transfer of ownership to local self-government units or in some other appropriate way, depending on the possibilities. Recently, the arrival of persons for Roma nationality to the CO in Čakovec is intensifying in order to collect documentation related to the issuance of spatial documentation (building permits) and arranging ownership

relationships. It was also noticed that the newly formed plots are respected in terms of boundaries, shapes, purposes. Positive events related to housing, use of space, respect for spatial order, issuance of necessary permits are related mainly to the younger part of the Roma population, but the overall positive effect of the Cadaster survey is tangible.

5.3 Elderly and persons with limited access to digital technologies

Digitalization of services, primarily land registry and cadaster could hinder access to those justices for persons who do not have access to digital technologies. As a mitigation measure, the new infrastructure under Component D will include physical information points and tools where persons that do not have access to digital technologies will be able to obtain information, documentation, and guidance.

5.4 Foreign workers

Given the current shortage of workers in the construction sector, foreign workers (either domestic or international) might be deployed to work on the project (component D). Contractors may engage migrant workers subject to meeting national requirements for work permits or a work registration certificate. Any person who is not a Croatian citizen (does not have Croatian citizenship) is considered a foreigner. Conditions for the residence and work of third-country citizens in the Republic of Croatia are governed by the provisions of the Foreigners Act (OG 133/20, 114/22, 151/22) and the Ordinance on the residence of citizens of third countries in the Republic of Croatia (OG 20/22). From January 1, 2021, there is no limit to the number of foreign workers that can be hired within Croatia. If a Croatian employer wants to hire a non-EU national, then they must request permission from the state employment agency - Croatian Employment Service before they can request a work and residence permit for a foreign worker. According to National Report Croatia the integration of migrant workers in Croatian society presents a major challenge, since Croatia lacks a consistent and pro futuro oriented migration and integration policies. Therefore, it would appear that migrant workers from third countries enjoy the basic rights and security in Croatia, but do not have equal opportunities. Migrant workers have no valid access to professional development, while the necessary language requirement is fully dependent on the capacities of individual employers. The project developed Labor management procedures in line with the requirements of EES2. Provisions of project LMP include, among others, requirement, for the Contractor to prepare and enforce a Code of Conduct for Workers and a functional project grievance redress mechanism (GRM). All contractors will be required to have a written contract with their workers materially consistent with objectives of ESS2. The working conditions and terms of employment of migrant workers should be the same or substantially equivalent to those of non-migrant project workers performing the same type of work. This applies to migrant project workers employed or engaged directly by the Borrower or through a third party.

5.5 Persons with no title

Persons with no titles might be homeless individuals or persons without stable housing that face significant hardships including social exclusion. Persons with no titles could be persons using a land (or a property) but having no formally registered right on it. This vulnerable group is particularly sensitive to risks related to land acquisition, restrictions on land use and involuntary resettlement. As exact location

of planned infrastructure investment in the cities of Rijeka and Velika Gorica are not known, the related risks for this vulnerable group cannot be defined but also cannot be excluded. Component C that includes cadastral survey might positively on this vulnerable group as harmonization of parcels of the land surface and cadastral parcels that are entered in the cadasters and land registry with the actual condition on the ground significantly improves legal certainty of land ownership and thus increases the value of the land. Furthermore, it is free for all residents of the area under survey with positive impacts for persons with low income (as the majority of persons with no title are).

6. Procedures and Implementation Arrangements

6.1 Environmental and Social Review of Project Activities (Sub-projects)

The environmental and social risk management procedures will be implemented as a part of the Project's subproject selection process. Any sub-project on an IFC list of excluded activities or screened to potentially have significant or high risk activities will not be eligible for financing. The E&S review process starts with E&S screening. In summary, the procedures for Project activities aim to do the following:

Table Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Assessment and Analysis: Subproject identification	Screening	<ul style="list-style-type: none"> - During subproject identification, ensure subproject eligibility by referring to the <i>Exclusion List in table below.</i> - For all activities, use the <i>Screening Questionnaire and Reporting Form in Annex 1</i> to identify and assess potential environmental and social risks and impacts, and carry out pre-identification of mitigation measures for the subproject. Identify E&S risk management instruments to be prepared / adopted and implemented for the sub-project - Identify the documentation, permits, and clearances required under the government's Environmental Regulation. - Submit for review and no objection by the World Bank results of E&S screening (E&S Screening report in an agreed form) with proposed risk rating and E&S Instrument
b. Formulation and Planning: E&S Assessment, Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	<ul style="list-style-type: none"> - Based on <i>Screening Report</i> adopt and/or prepare relevant environmental and social procedures and plans. - Carry out E&S assessment for activities requiring, Environmental and Social Management Plans (ESMPs) or ESMP Checklist, submit the first ESMPs or ESMP Checklist, for prior review and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding). - For activities requiring development of ESMP/ESMP

		<p>Checklist/CHMP, subproject SEP will be developed by the PIU and submitted for review and no objection by the World Bank prior to initiating bidding processes for the design of the infrastructure.</p> <ul style="list-style-type: none"> - Ensure that the contents of the ESMPs, ESMP Checklist, LMP are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the Project and, if relevant, sub-project SEPs. - Complete all documentation, permits, and clearances required under the government’s Environmental Regulation. - Train staff responsible for implementation and monitoring of plans. - Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.
<p>c. Implementation and Monitoring: Implementation support and continuous monitoring for projects</p>	Implementation	<ul style="list-style-type: none"> - Ensure implementation of ESMPs, ESMPs Checklist, LMP and other plans through site visits, regular reporting from the field, and other planned monitoring. - When needed, define corrective actions and ensure their implementation. - Track grievances/beneficiary feedback. - Continue awareness raising and/or training for relevant staff, volunteers, contractors, communities and other concerned stakeholders in accordance with the Project as well as subproject SEPs. - Report in line with ESCP and site-specific E&S instruments.
<p>d. Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis</p>	Completion	<ul style="list-style-type: none"> - Assess whether plans have been effectively implemented. - Ensure that physical sites are properly restored.- Conduct stakeholder activities and collect feedback in line with Project and site-specific SEPs

More detail for each stage is provided below.

a. Subproject Assessment and Analysis – E&S Screening

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project’s eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

Table 5. Exclusion List

- Weapons, including but not limited to mines, guns, ammunition, and explosives
- Support of production of any hazardous good, including alcohol, tobacco, and controlled substances
- Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law
- Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats
- Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes
- Activities involving changing forestland into agricultural land or logging activities in primary forest
- Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides)
- Construction of any new dams or rehabilitation of existing dams including structural and or operational changes; or irrigation or water supply subprojects that will depend on the storage and operation of an existing dam, or a dam under construction for the supply of water
- Activities that involve the use of international waterways
- Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures
- Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development
- Any activity on land that has disputed ownership or tenure rights
- Any activity that will cause physical relocation of households or will require the use of eminent domain
- Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA)
- Any activity that will require Free, Prior and Informed Consent (FPIC) as defined in ESS7.

As a second step, the MoJPA and SGA with the support of environmental and social specialists of the PIU will use the ***E&S Screening Report in Annex 1*** to identify and assess relevant environmental and social risks specific to the activities, and identify the appropriate E&S instruments. The *Screening Report* also lists the various mitigation measures and suggests instruments that are relevant for the specific activities (such as Environmental and Social Management Plan (ESMP), ESMP Checklist, Cultural Heritage Management Plan (CHMP), the Labor Management Procedures, etc.)

The MoJPA and SGA with the support of environmental and social specialists of the PIU will also identify the documentation, permits, and clearances required under the government's Environmental Regulation. The final decision on subproject risk classification and identified measures and E&S risk management instruments to be prepared / adopted and implemented requires no objection from WB Environmental and Social Specialists, who confirms the risk and the E&S risk management instruments. For subprojects with potential impacts on communities or other stakeholders, to gain meaningful feedback for identification of adequate measures, a proportionate level of stakeholder engagement will be conducted during sub-project risk screening.

b. Subproject Formulation and Planning – E&S Assessment

Based on the process above and the Screening Report, the MoJPA and SGA with the support of environmental and social specialists of the PIU will adopt the necessary environmental and social management instruments templates of which are already included in the Annexes of this ESMF (such as the ESMP).

If site-specific ESMPs are necessary, the MoJPA and SGA with the support of environmental and social specialists of the PIU will prepare these ESMPs and other applicable documents as needed. The MoJPA and SGA will compile ESMPs and other applicable documents. The contents of the ESMPs, or other E&S instrument, depending on the screening procedure, will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If multiple subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared.

E&S assessment and preparation of the E&S instruments will be based on the feedback gained through the stakeholder engagement activities as defined by Project SEP and, where applicable sub-project SEPs.

If the risks related to land acquisition, restrictions on land use and involuntary resettlement could occur (especially for the locations in Rijeka and Velika Gorica), the Resettlement policy framework (RPF) guides the preparation of abbreviated Resettlement Action Plans (RAPs). The Project Implementation Unit (PIU) shall carefully screen the proposed subproject locations to assess whether land acquisition may be required and to what extent. An example of a potential template for the land acquisition, restrictions on land use and involuntary resettlement screening process is given in Annex I of the RPF. Following the screening process and determination of potential impacts, the PIU shall report the findings of the screening process to the WB and prepare site-specific RAPs, ensuring that all project activities adhere to the requirements of this RPF. The RAPs will be submitted to the WB for no-objection prior to disclosure and once the agreements have been made with the Project affected persons (PAP). Project activities that will cause physical and/or economic displacement will not commence until such specific plans have MoJPA and SGA of Justice websites.

The E&S instruments must be prepared prior to bidding procedures and submitted to the World Bank for prior review and no objection. After the approval is obtained, the E&S instruments shall be publicly

disclosed and consulted. The finalized E&S Instruments will reflect relevant comments obtained in the public consultations and include minutes of public consultations.

The MoJPA and SGA with the support of environmental and social specialists of the PIU will also complete the documentation, permits and clearances required under the government's Environmental and Social Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The environmental and social specialists of the PIU should provide such training to field staff.

The environmental and social specialists of the PIU should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The environmental and social specialists of the PIU will provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The environmental and social specialists of the PIU should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

c. Implementation and Monitoring – E&S Implementation

MoJPA will lead and coordinate project activities and will be responsible for overall implementation of ESSs. E&S management of the Project will be assumed by the existing PIU at MoJPA. This PIU is experienced and trained in the implementation of safeguards as well as the ESF. It includes an experienced environmental expert as well as a social expert who has been working closely with the Bank team under the J4B project. As the environmental expert is currently engaged part-time on environmental management (while also acting as the supervising engineer), additional environmental management capacity will be engaged during Project implementation if/when deemed necessary. The social expert may need to hire additional help to manage social risks and promote social inclusion activities for both projects simultaneously. For sub-projects that trigger ESS8, if advised by the competent/local authorities, the PIU shall receive in-house or outsourced CH expertise for proper implementation of the Cultural Heritage Management Plan. Regardless of their experience and past Safeguards and ESF trainings taken, the World Bank will organize project specific ESF trainings for the entire PIU and relevant MoJPA and SGA staff.

Implementation progress of the Project will be monitored based on completed procurements, project disbursements, and achievement of the results indicators. In addition to implementation support missions conducted by the Bank every six months, the PIU will be required to submit biannual progress reports to its management and the Bank for review. A Mid-Term Review will be carried out by the Bank at the mid-point of project implementation to assess the overall project progress, identify critical implementation issues, and make any necessary revisions to the project design or schedule.

During implementation, the MoJPA and SGA with the support of environmental and social specialists of the PIU will conduct regular monitoring visits. If there are contractors implementing subproject activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, with MoJPA and SGA with the support of environmental and social specialists of the PIU oversight.

The MoJPA and SGA with the support of environmental and social specialists of the PIU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports will be submitted to the World Bank on biannual basis.

Throughout the Project implementation stage, the MoJPA and SGA with the support of environmental and social specialists of the PIU will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures.

The social specialists of the PIU will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

If the environmental specialist or social specialist or any member of the PIU becomes aware of a serious incident in connection with the project related to human health and safety, environment, CH and other relevant), which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality, losing limbs, injuring internal organs and similar life-endangering accidents are automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

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 conformation. 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. As above stated, 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 ESMP) 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 in 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).

d. Review and Evaluation – E&S Completion

Upon completion of Project activities, the MoJPA and SGA with the support of environmental and social specialists of the PIU will review and evaluate progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, the environmental specialists of the PIU will monitor activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The MoJPA and SGA with the support of environmental and social specialists of the PIU will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

5.4 Implementation Arrangements

The project will be managed by two implementing agencies, MoJPA and SGA, and financed via Component E. Both agencies have considerable experience implementing WB-financed projects. A single

PIU will manage implementation of project activities, representing both MoJPA and SGA. Where activities are joint activities implemented by MoJPA and SGA both entities will have signing authority. Where activities fall under the mandate of a single entity only that entity will have signing authority.

The PIU will include a project manager supported by a technical team and administrative staff. The technical team will include at least one M&E specialist responsible for general coordination and monitoring, FM specialist, procurement specialists, environmental specialist, social specialist and architects. Administrative staff will include administrative assistants and translators. The PIU will also help coordinate and oversee the implementation teams and will work with other teams working on complementary projects/technical assistance financed outside of the project. It will be responsible for the preparation of the Terms of Reference for technical experts who will be recruited for the implementation teams. It will also be responsible for the preparation, update and disclosure of ESF instruments as well as overall ESF and national legislation compliance throughout project implementation.

The table below summarizes the roles and responsibilities regarding the implementation arrangements for **environmental and social management**.

Table. Implementation Arrangements

Level/ Responsible Party	Roles and Responsibilities
PIU / Implementing agencies	<ul style="list-style-type: none"> - Diligently carry out environmental and social review of project activities. - Carry out E&S assessments and prepare relevant ESF instruments; - Provide support, oversight, and quality control to contractor staff working on environmental and social risk management. - Collect, review, and provide quality assurance and approval to Screening Forms and ESMPs as relevant. Keep documentation of all progress. - Oversee overall implementation and monitoring of environmental and social mitigation and management activities, compile progress reports from subprojects, and report to the World Bank on a biannual] basis. - Train field staff and contractors who will be responsible for implementing the ESMF/ESMPs.. - Ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms and identified and prepared E&S instruments, e.g. ESMP, ESMP Checklist, CHMP, and other applicable. - Ensure project activities do not fall under the Negative List. Fill out Screening Forms for relevant subproject activities. - If relevant, complete site-specific ESMPs for subproject activities - If relevant, complete and implement RAPs for sub-project activities - Prepare, publicly consult, and disclose project and sub-projects stakeholder engagement plans, and revise documents as necessary

	<ul style="list-style-type: none"> - conduct stakeholder engagement activities as defined in Project SEP and sub-project SEPs, - Establish and manage the Grievance Mechanism (GRM) and prepare GRM reports - Oversee implementation and monitoring of environmental and social mitigation measures, and report progress and performance - Provide training to local contractors and communities on relevant environmental and social mitigation measures, roles, and responsibilities. <p>Ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms and E&S instruments such as ESMP, ESMP Checklist, CHMP, LMP, SEP and other deem needed.</p>
Contractors	<ul style="list-style-type: none"> - Comply with the Project's environmental and social mitigation and management measures as specified in the site-specific ESMP, ESMP Checklist, CHMP, LMP, permits and contract documents, as well as national and local legislation. - Report on implemented measures and E&S compliance when requested. - Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. - Implement timely required corrective measures.

5.5 Proposed Training and Capacity Building

Proposed Training and Capacity Building Approach

Level	Responsible Party	Audience	Topics/Themes that May Be Covered
National level	World Bank	National staff responsible for overall implementation of ESMF	<p>ESMF and approach:</p> <ul style="list-style-type: none"> - Identification and assessment of E&S risks - Selection and application of relevant E&S risk management measures/instruments - E&S monitoring and reporting - Incident and accident reporting - Application of LMP, including Code of Conduct, incident reporting, SEA/SH, Application of SEP and the grievance/beneficiary feedback mechanism
National level	PIU	Contractors	<p>ESMF and approach:</p> <ul style="list-style-type: none"> - Identification and assessment of E&S risks - Selection and application of relevant E&S risk management measures - E&S monitoring and reporting - Incident and accident reporting - Application of LMP, including Code of

			Conduct, incident reporting, SEA/SH, - Application of SEP and the grievance/beneficiary feedback mechanism - Application of ESMPs or ESMP Checklist, CHMP, LMP, and other as relevant
Subproject level	Contractors	Workers	- Basic OHS measures and Personal Protective Equipment - Community health and safety issues - Worker Code of Conduct - SEA/SH issues, prevention, measures - Grievance redress mechanism - Workers' grievance redress

6.2 Estimated Budget

The following table lists estimated cost items for the implementation for the ESMF, which have been included in the overall project budget:

Table - ESMF Implementation Budget

Activity/Cost Item	Potential Cost (USD)
Trainings for staff (venue, travel, refreshments etc.)	5.000,00
Trainings for contractors (venue, travel, refreshments, etc.)	1.000,00
Printing of awareness raising materials / grievance redress materials	1.000,00
Preparation of site-specific ESMPs and other site-specific E&S instruments	Included in costs for PIU
Cost of obtaining clearances or permits	Included in costs for design
Implementation of site-specific ESMPs and other site-specific E&S instruments	Included in costs for PIU
Environmental and social staff (for different levels)	Included in costs for PIU
Travel and accommodation budget for environmental and social staff site visits	Included in costs for PIU

7. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here:

<https://mpu.gov.hr/UserDocsImages//dokumenti/Projekti/Svjetska%20banka//SEP-EN.pdf>

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, have been disclosed in draft for stakeholder consultations on the following website:

<https://mpu.gov.hr/istaknute teme/projekti/zajmovi-svjetske-banke/projekt-integrirane-zemljisne-administracije-i-pravosudnih-usluga/poziv-na-javno-savjetovanje-call-for-public-consultations-27635/27635>.

Key feedback, if any, on the disclosed ESMF and SEP will be available on the same web page.

Annex 1. Screening Form

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** included in the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

1. Subproject Information:

Subproject Title	
Subproject Location	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads), community centers, schools, bridges and jetties?			If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?			If "Yes": 1. Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents.
Will construction or renovation works require new borrow pits or quarries to be opened?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Does the project lead to any risks and impacts on, individuals			If "Yes": Apply relevant measures described

or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. ³			in the ESMF and SEP.
ESS2			
Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply LMP
Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": Apply LMP
Is there a possibility of infections of disease spread related to the location or works? Is there a need for extra or special types of health protection?			
Is there a risk that women may be underpaid when compared to men when working on the project construction?			If "Yes": Apply LMP
ESS3			
Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Do any of the construction works involve the removal of asbestos or other hazardous materials?			If "Yes": Apply asbestos guidance provide in the ESCOP
What types of hazardous waste is expected and in approximately (descriptive) quantities?			
Is there a possibility of historical pollution at the site? What type?			
Are there major pollutants in the vicinity?			
Is there an existing infrastructure at the site that is potentially polluting or dangerous (e.g. old diesel tanks, boilers, AC systems, gas installations, and similar)?			
Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g.,			If "Yes": Apply Fertilizer and Pest Management Plan in Annex 7.

³ "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			
ESS4			
Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply LMP in Annex 4 and relevant measures in SEP.
Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If "Yes": Apply LMP in Annex 4.
Is there a risk that SEA/SH may increase as a result of project works?			If "Yes": Apply LMP in Annex 4.
Would any public facilities, such as schools, health clinic, church be negatively affected by construction?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5			
Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)? ⁴			If "Yes": Refer to and apply the project Resettlement Framework (RF).
Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Refer to and apply the project RF.
Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Refer to and apply the project RF.
Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?			If "Yes": Refer to and apply the project RF.
Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?			If "Yes": Refer to and apply the project RF.
Is private land required for the subproject activity being voluntarily donated to the project? ⁵			If "Yes": Refer to and apply the project RF.
ESS6			
Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats ⁶			If "Yes": Exclude from project.

⁴ Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

⁵ Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

whether directly or indirectly, or which would lead to adverse impacts on natural habitats? ⁷			
Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
Will this activity require clearance of trees, including inland natural vegetation? To what extent?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Exclude from project if more than x hectares of tree and vegetation cutting is expected. 2. Include E&S risk management measures in bidding documents.
Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
ESS8			
Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 4.
Does the sub-project include interventions in the cultural heritage?			
Can the project activities impact cultural heritage?			
Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 4.

3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

Name and title of person who conducted screening:

Date of screening:

⁶ Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

⁷ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

Annex 2. Environmental and Social Codes of Practice (ESCOP)

To manage and mitigate potential negative environmental impacts, the project applies Environmental Codes of Practice (ESCOPs); outlined in this document. The ESCOPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the Borrower and contractors. ESCOP creates a basis for preparation of a site-specific E&S Instruments such as ESMP and ESMP Checklist.

The ESCOPs in this section relate to infrastructure subprojects (general guidelines and technical guidelines)

General ESCOP for Infrastructure Subprojects

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during construction	<ul style="list-style-type: none"> a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase) b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase) c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase) 	Designer, Contractor
2. Soil erosion	<ul style="list-style-type: none"> a) Schedule construction during dry season. (Planning phase) b) Contour and minimize length and steepness of slopes. (Implementation phase) c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase) d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase) e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm fronds, jute mats, etc.). (Post-Implementation phase) 	Designer, Contractor
3. Air quality	<ul style="list-style-type: none"> a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase) b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase) c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. (Implementation phase) d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase) e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase) 	Contractor
4. Water quality and availability	<ul style="list-style-type: none"> a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase) b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, 	Contractor

	<p>poured into or thrown into water bodies for dilution or disposal. (Implementation phase)</p> <p>c) Avoid the use of waste water pools particularly without impermeable liners.</p> <p>d) Provision of toilets with temporary septic tank. (Implementation phase)</p> <p>e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of river beds or flooding of settlements. (Implementation phase)</p> <p>f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase)</p>	
5. Solid and hazardous waste	<p>a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase)</p> <p>b) Collect, store and transport construction waste to appropriately designated/controlled dump sites. (Implementation phase)</p> <p>c) On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 metres from rivers, streams, lakes and wetlands. (Implementation phase)</p> <p>d) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase)</p> <p>e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase)</p> <p>f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase)</p> <p>g) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase)</p>	Contractor
6. Asbestos	<p>a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase)</p> <p>b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase)</p> <p>c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase)</p> <p>d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. (Implementation phase)</p> <p>e) Removed ACM must not be reused. (Implementation and post-implementation phase)</p>	Contractor
7. Health and Safety	<p>a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase)</p> <p>It is useful to consider:</p> <ul style="list-style-type: none"> • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? 	Designer Contractor

	<ul style="list-style-type: none"> • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? <p>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</p> <p>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase):</p> <ul style="list-style-type: none"> • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge and experience to perform the task. • Check that the place (eg a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground. <p>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</p> <p>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</p> <p>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</p> <p>g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase)</p> <p>h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase)</p> <p>i) Ensure structural openings are covered/protected adequately. (Implementation phase)</p> <p>j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase)</p> <p>k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase)</p> <p>l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase)</p> <p>m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase)</p>	
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	<p>n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase)</p> <p>o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)</p>	
8. Other	<p>a) No cutting of trees or destruction of vegetation other than on construction site. The implementing agencies will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase)</p> <p>b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase)</p> <p>c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase)</p> <p>d) No disturbance of cultural or historic sites. (Planning and implementation phases)</p>	Designer Contractor

Specific ESCOPs for Infrastructure Subprojects

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Buildings		
In general	<p>a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase)</p> <p>b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase)</p> <p>c) Restrict use of asbestos cement tiles as roofing. (Implementation phase)</p> <p>d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)</p>	Designer Contractor
Electrification		
Solar power supply	<p>a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase)</p> <p>b) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases)</p> <p>c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase)</p>	Designer Contractor

Annex 3. Environmental and Social Management Plan (ESMP) Template

Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMP should be customized for each specific subproject location and activities.

1. Subproject Information

Subproject Title:	
Estimated Cost:	
Start/Completion Date:	

2. Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map of the location to the ESMP.

3. Subproject Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads or transmission lines, or communication campaigns that accompany service provision).

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase.

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation		Impact/Mitigation Monitoring		
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.

7. Attachments

ESCOPs, site specific SEP etc.

IV. Review & Approval

<p>Prepared By:(Signature) Position: Date</p>	
<p>Reviewed By:(Signature) Position:Date</p>	<p>Approved By:(Signature) Position: Date</p>

Annex 4. Chance Find Procedures

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

In the event that during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures take into account requirements related to Chance Finding under national legislation including the Act on the Protection and Preservation of Cultural Heritage (OG 69/99, 151/03, 157/03, 100/04, 87/09, 88/10, 61/11, 25/12, 136/12, 157/13, 152/14, 98/15, 44/17, 90/18, 32/20, 62/20, 117/21, 114/22)

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible authorities take over. These authorities are identified in the Act on the Protection and Preservation of Cultural Heritage and connected bylaw .
- Notify to the MoJPA, SGA and PIU staff and the relevant authorities under national legislation immediately.
- The relevant authority identified in the Act on the Protection and Preservation of Cultural Heritage and connected bylaw would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the authority identified in the Act on the Protection and Preservation of Cultural Heritage and connected bylaw determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the authority identified in the Act on the Protection and Preservation of Cultural Heritage and connected bylaw determines chance find is an isolated chance find, the authority would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.
- PIU shall notify the WB Environmental specialist of a finding without a delay. The Contractor and PIU will follow instructions of the competent authority and re-commence works only then the competent authority allows works (in a written form). Key records will be kept.