

**Government of the Republic of Croatia/Ministry
of Justice and Public Administration,
Justice for Business Program, P167247**

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

January, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Croatia through the Ministry of Justice and Public Administration (MoJPA) as the main implementing agency will implement the Justice for Business Program (the Project). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.
2. The Republic of Croatia will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Republic of Croatia will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plan Checklists (ESMP Checklists), Cultural Heritage Management Plans (CHMPs), the Stakeholder Engagement Plan (SEP), the Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The Republic of Croatia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Republic of Croatia as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Republic of Croatia, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Ministry of Justice and Public Administration (for the Republic of Croatia) will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Ministry of Justice and Public Administration (for the Republic of Croatia). The Ministry of Justice and Public Administration will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Republic of Croatia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental impacts related to construction (e.g. asbestos removal and waste disposal), health, and safety impacts (e.g. stability of buildings, accidental situations, etc.), as well as impacts to cultural heritage (chance findings, additional needs or requests for conservation and similar).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit regular monitoring reports on the environmental, social, health and safety performance of the Project, including implementation of the ESCP, and any E&S due diligence document prepared or to be prepared and implemented (ESMP Checklist and CHMP; depending of the type of the subproject) for the Project, in form and substance acceptable to WB.</p>	<p><i>Every six months throughout Project implementation in conjunction with the Project's progress reports, or as concluded after progress review.</i></p>	<p><i>Project Implementation Unit (PIU) within the Ministry of Justice and Public Administration (MoJPA)</i></p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify within 24 hours any incident or accident related to the project or that has an impact on it, and that has or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example, occupational accidents that could result in serious injury, minors, injuries, falls, vehicle accidents, larger spills of chemicals, oils, fuels, etc.</p> <p>The MoJPA will provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it and include any information provided by any Contractor/Subcontractor or supervising engineer. Incident and accidents reporting requirements will be incorporated into the project implementation and procedures manuals.</p>	<p><i>Any incident or accident shall be notified immediately after taking note of the incident or accident, report to the Task Team Leader of the Bank</i></p>	<p><i>PIU Project Coordinator</i></p>
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Contractors will provide monthly monitoring reports to the Project Implementing Unit.</p>	<p><i>Monthly and upon request from the PIU (in the case of incidental or unexpected situations)</i></p>	<p><i>PIU to place the requirement clause in the contract</i></p> <p><i>Contractor</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure (PIU) with qualified staff to support management of environmental and social risks of the Project including environment and social specialists responsible for ensuring full compliance with the ESF and relevant instruments.</p>	<p><i>An organizational structure including environmental and social specialist is established after Project effectiveness. The organizational structure, including the specialists, should be maintained throughout Project implementation</i></p>	<p><i>MoJPA</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Update satisfactory to WB, redisclose, publicly consult and implement, the Environmental and Social Management Plan (ESMP) Checklists and Cultural Heritage Management Plans (CHMPs) for sub-projects in Vinkovci, Zagreb (Phase II) and Kutina.</p> <p>SEP will be prepared as a tool for identification and engagement and solicit feedback by different stakeholders on project and sub-project level but as well as to identify and manage social and environmental risks and impacts from the project and proposing appropriate mitigation measures for implementation during the project realization.</p>	<p><i>ESMP Checklists for Vinkovci, Zagreb and Kutina were prepared, disclosed and consulted prior to appraisal. ESMP Checklist for Zagreb Phase I was updated and redisclosed in February 2021, prior to bidding of works. The ESMP Checklists will be updated, redisclosed and publicly consulted before bidding of works (for Vinkovci, Kutina and Zagreb Phase II). CHMPs for Vinkovci and Zagreb have been prepared, disclosed and consulted, and will be updated and redisclosed if necessary, before bidding of works. Once prepared, ESMP Checklists apply throughout Project implementation. ESMP Checklists will be updated as necessary to be in line with final designs and submitted for the Bank approval before launching the bidding process for the respective locations. Once approved, the ESMP Checklists are carried out throughout Project implementation</i></p> <p><i>Initial SEP is prepared and will be updated and redisclosed by January 31, 2022</i></p>	<p><i>MoJPA will prepare ESMP Checklists or update existing ESMP Checklists and CHMPs with the support of PIU ESS</i></p> <p><i>ESMP Checklist will be implemented by contractor and supervising engineer.</i></p> <p><i>SEP will be implemented by PIU</i></p>
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Prepare, satisfactory to the WB, publicly consult and implement, the (ESMP) Checklists and CHMP for sub-project in Varazdin.</p>	<p><i>ESMP Checklist for Varazdin will be prepared during project implementation and will be disclosed and consulted before bidding of works.</i></p>	<p><i>MoJPA will prepare ESMP Checklists</i></p> <p><i>ESMP Checklist will be implemented by contractor and supervising engineer.</i></p> <p><i>SEP will be implemented by PIU</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>MoJPA will develop and implement procedures for managing Contractors and subcontractors. Incorporate the obligation of prepared an Environmental Health and Safety (EHS) plan/Labor Management Procedures (LMP) into the contractual agreements with contractors and subcontractors. Environmental and Social obligations will be included in all bidding documents including the contractual agreements.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Prior to signature of contracts</i></p> <p><i>Implementation of the management tools and instruments required throughout Project implementation</i></p> <p><i>Supervision of contractors throughout Project implementation</i></p>	<p>PIU</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop maintain and implement, throughout Project implementation, labor management procedures consistent with national legislation and ESS2, and ensure they are available to Project workers and all sub-contractors engaged. The Labor management procedures (LMP) will address all issues identified in ESS2, including the applicable requirements regarding non-discrimination and equal opportunity. Update, adopt, and implement the LMP that have been developed for the Project.</p>	<p><i>LMP will be refined further by Project effectiveness.</i></p> <p><i>Prior to performing work.</i></p> <p><i>LMP to be applied throughout Project implementation</i></p>	<p>PIU</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Develop, maintain, and operate a grievance mechanism for Project workers -as described in the LMP and consistent with national labor legislation and the ESS2 requirements. related labor and employment matters, easily accessible and promptly disclosed to Project workers, in line with ESS2 and labor laws in Croatia.</p>	<p><i>Project Grievance Mechanism has been developed and will be maintained and operated throughout project implementation. Information about grievance mechanism is disseminated to project workers.</i></p>	<p><i>Project Manager (PIU)</i></p> <p><i>Funding from project resources and contractor budget</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational health and safety measures (OHS), including emergency preparedness and response measures, project workers training to heighten awareness of possible risks (PPE, first aid, firefighting equipment, etc.), injuries and to mitigate impacts on local communities.</p>	<p><i>Contractual obligation Maintained throughout Project implementation Before commencement of works at any of the sites.</i></p> <p><i>LMP to be applied throughout Project implementation</i></p>	Project Manager (PIU)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: The Contractor will develop and implement measures and actions defined in ESMP Checklists. All waste streams that will be generated on spot should be identified and monitored</p>	<p><i>Contractual obligation Maintained throughout Project implementation.</i></p>	Contractors
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC MANAGEMENT PLAN: As part of its bid, the successful Contractor is required to submit a preliminary TMP. Before work commencement, an updated TMP will be submitted and will form part of ESMP or ESMP Checklist.</p>	<p><i>During project implementation</i></p>	PIU
4.2	<p>CONSULTATION AND COMMUNITY AWARENESS: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project and include these measures in the ESMP Checklists.</p>	<p><i>The ESMP Checklists shall be disclosed with adequate time to facilitate public consultations prior to start of any works. Grievance mechanisms will be available throughout project implementation</i></p> <p><i>Throughout project implementation</i></p>	PIU
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS: Chance find procedures will be part of all contracts involving any works under the project.</p>	<p><i>Prior to commencement of works and maintained throughout construction. Throughout Project Implementation</i></p>	Contractors
8.2	<p>CULTURAL HERITAGE MANAGEMENT PLANS: Update satisfactory to WB, redisclose, and implement, the Environmental and Cultural Heritage Management Plans for Vinkovci and Zagreb</p>	<p><i>Prepare before appraisal, update and redisclosed before bidding of works, if necessary, implement during project implementation</i></p>	PIU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Develop, disclose and implement Stakeholder Engagement Plan (SEP)) consistent with ESS10, in a manner acceptable to the Bank The SEP may be amended and updated (and redisclosed) as needed during Project implementation.</p>	<p><i>An initial SEP was prepared in November 2019 and disclosed in January 2020. SEP will be revised and redisclosed satisfactory to the WB by January 31, 2022.</i></p> <p><i>The SEP shall be implemented throughout the Project implementation period.</i></p>	PIU
10.2	<p>GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism (GM), as described in the SEP. The SEP includes a commitment to communicate to stakeholders the establishment of the grievance mechanism to ensure that affected stakeholders are aware of its existence and familiar with the process for submitting grievances to such grievance mechanism.</p>	<p><i>Throughout Project implementation. Regular maintenance of grievance database.</i></p>	PIU (Project Manager)
CAPACITY SUPPORT (TRAINING)			
CS1	MoJPA should have on board Environmental and Social Specialist (ESS).	<p><i>Environmental and Social Specialist has been engaged since February 2021</i></p>	MoJPA
CS2	<p>Relevant Ministry Staff training on:</p> <ul style="list-style-type: none"> - SEP - ESMP Checklist preparation, updates and oversight - LMP oversight <p>And other topics as relevant</p>	<p><i>Throughout Project Implementation, at minimum once a year.</i></p>	PIU ESS
CS3	Training for the contractors on implementation of environmental and social due diligence documents	<p><i>Throughout of the project implementation, preferred timing would be after the signing of the contract and before commencement of works</i></p>	PIU ESS