

**The Republic of Croatia**

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**Ministry of Science and Education  
(MoSE)**

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**SEE Croatia: Towards Sustainable, Equitable  
and Efficient Education, P170178**

**Draft for Appraisal**

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

**June 11, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Croatia (hereafter the Borrower), through the Ministry of Science and Education (MoSE) as the main implementing agency shall implement the SEE Croatia: Towards Sustainable, Equitable and Efficient Education Project (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 shall 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 shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP), Environmental and Social Management Plan Checklists (ESMP Checklists), Cultural Heritage Management Plans (CHMPs), the Stakeholder Engagement Plan (SEP), 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 shall 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 Science and Education (for the Republic of Croatia) shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the Ministry of Science and Education (for the Republic of Croatia). The Ministry of Science and Education shall 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></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&amp;S due diligence document prepared or to be prepared and implemented (ESMP, ESMP Checklist and CHMP; depending on the type of the subproject), stakeholder engagement activities, functioning of the grievance mechanism(s). E&amp;S reporting within the Project Progress Report, shall be in form and substance acceptable to WB.</p> <p>Ensure frequency and content of monitoring reports are detailed in the Project Operations Manual and implemented accordingly.</p>	<p><i>Every six months throughout Project implementation period, starting from the Loan Agreement Effective date</i></p>	<p><i>Project Implementation Unit (PIU) within the Ministry of Science and Education (MoSE)</i></p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank within 48 hours of 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. The report shall 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.</p> <p>As per Bank's request, MoSE shall prepare a report on the incident or accident with a detailed Root Cause Analysis(RCA) to be submitted within 30 business days of the incident to the Bank.</p> <p>Detailed incident report and accidents reporting requirements shall be incorporated into the project implementation and procedures manuals.</p>	<p><i>The incident reporting procedure shall be prepared within 30 days following Loan Agreement Effective date (as a standalone or as a part of the POM) and Maintained throughout Project implementation.</i></p> <p><i>Notify the Bank within 48 hours after learning of the incident or accident. Report on the incident or accident with a detailed Root Cause Analysis (RCA) to be submitted within 30 business days of the incident to the Bank.</i></p>	<p><i>PIU Project Coordinator</i></p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require all Contractors to provide monitoring reports on ESMP, LMP and SEP implementation to Supervising Engineer and the Project Implementation Unit (PIU). Such reports shall be submitted to the Bank by PIU upon request.</p>	<p><i>Monthly and upon request from the PIU throughout the project implementation (e.g. in the case of incidental or unexpected situations)</i></p>	<p><i>PIU</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>		
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b> Establish and maintain an organizational structure (PIU) with qualified staff to support management of environmental and social risks of the Project including a full-time engaged environmental and full-time social specialist responsible for ensuring full compliance with the ESF and relevant instruments. PIU will also include communications specialist.</p>	<p><i>An organizational structure including the full-time environmental and full-time social specialist as well as a communications specialist will be established within 30 days following Loan Agreement Effective date. The organizational structure, including the Environmental and Social specialist, shall be maintained throughout Project implementation</i></p>	<p>MoSE</p>
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b> Disclose, publicly consult, finalize and implement, the existing draft Environmental and Social Management Framework (ESMF), which sets out policies and procedures to address the environmental and social risks and impacts of the Project in accordance with ESS1 and other relevant ESSs in a manner acceptable to the Bank.</p>	<p><i>Project's draft ESMF shall be disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date .</i></p> <p><i>Implemented throughout Project duration.</i></p> <p><i>Project activities shall not commence before the ESMF is finalized and final version disclosed.</i></p>	<p>MoSE prepares and finalizes ESMF.</p>
<p>1.3 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b> Prepare, adopt, disclose, publicly consult, finalize and implement, the Environmental and Social Management Plan (ESMP), the Environmental and Social Management Plan Checklists (ESMP Checklists) and Cultural Heritage Management Plans (CHMPs) for the selected sub-projects.</p>	<p><i>ESMP, ESMP Checklist and CHMP, when required, shall be prepared approved by the WB, disclosed, consulted and finalized before bidding and contracting of commencing works.</i></p> <p><i>ESMP, ESMP Checklist and CHMP, shall be integrated into bidding and contracting documentation.</i></p> <p><i>Implemented throughout Project duration.</i></p>	<p>PIU</p> <p>ESMP, ESMP Checklist and CHMP shall be implemented by contractor and supervising engineer.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>MoSE shall develop and implement procedures for managing Contractors and subcontractors.</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>Ensure contractor prepares and maintains Contractor’s ESMP, including:</p> <ul style="list-style-type: none"> <li>• Occupational health and safety plan</li> <li>• Waste management plan</li> <li>• Traffic management plan</li> <li>• Training plan for ESHS risks</li> <li>• Emergency Response Plan for the project</li> <li>• Grievance Redress Mechanism</li> <li>• Demobilization plan after completion of works.</li> </ul> <p>Environmental and Social obligations, in the form of the ESMP, ESMP Checklist and CHMP, shall be included in all bidding documents including the contractual agreements.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Incorporate into Contracts 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>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Project shall be carried out in accordance with national legislation and applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Labor Management Procedures (LMP) and sections on Environment Health and Safety shall be included in the ESMF, POM, ESMP, ESMP Checklists and the.</p>	<p><i>LMP is included in the ESMF. The project’s draft ESMF, which includes the LMP shall be disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date.</i></p> <p><i>Project activities shall not commence before the ESMF, which includes the LMP, is finalized and final version disclosed.</i></p> <p><i>LMP to be applied throughout Project implementation</i></p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>                      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>Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.</i></p>	<p>PIU</p>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b>                      Develop and implement occupational health and safety measures (OHS) as an integral part of ESMP/ESMP Checklist, 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>OHS measures and will be prepared before the commencement of works at any of the sites and shall be implemented throughout Project implementation</i></p>	<p>PIU</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Relevant aspects of this standard shall be considered, as needed, under action 1.2 and 1.3 above, including, waste management, hazardous waste management, resource efficiency, water and soil protection, etc. All waste streams that shall be generated on spot should be identified and monitored.</p>	<p><i>The project's draft ESMF, which includes resource efficiency and pollution prevention and management shall be disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date and Implemented throughout Project duration.</i></p> <p><i>ESMP or ESMP Checklist, shall be prepared during project implementation and shall be approved by the WB, disclosed, consulted and finalized before contracting and commencing works.</i></p> <p><i>ESMP or ESMP Checklist shall be integrated to bidding and contracting documentation.</i></p> <p><i>Project activities shall not commence before the ESMF is finalized and final version disclosed.</i></p>	<p>PIU</p>

ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	<p><b>COVID-19 AND SH/SEA PREVENTION</b></p> <p>As part of LMP/POM and the ongoing COVID pandemic, prepare a checklist and guidance note for all workers to ensure health and safety of workers and community. Consider any labor influx or prevention of gender related violence risks as well.</p> <p>Obligate the Contractors to adopt the Code of Conduct included in the contractor’s LMP and provide training to all workers to manage Sexual Exploitation and Abuse / Sexual Harassment risks in the sub-projects.</p>	<p><i>LMP is included in the ESMF. The project’s draft ESMF, which includes the LMP shall be disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date. These provisions will be implemented throughout the project lifetime.</i></p> <p><i>Contractors obligation to be included in the bidding documents. C-LMP will be finalized prior to commencement of works and implemented throughout the project lifetime.</i></p> <p>PIU</p>

<p>4.2</p>	<p><b>TRAFFIC MANAGEMENT PLAN:</b>                  As part of its bid the successful Contractor is required to submit a preliminary TMP. Before work commencement updated TMP shall be submitted to PIU Environmental Specialist and Social Specialist and shall form part of ESMP or ESMP Checklist, as defined in the ESMF.</p>	<p><i>TMP, as a part of ESMP or ESMP Checklist, shall be prepared during project implementation and shall be WB approved, disclosed, consulted and finalized before contracting and commencing works. ESMP or ESMP Checklist shall be integrated into bidding and contracting documentation.</i></p> <p><i>Project activities shall not commence before the ESMF is finalized and final version disclosed.</i></p> <p><i>Implemented throughout Project duration.</i></p>	
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<p>4.3</p>	<p><b>CONSULTATION AND COMMUNITY AWARENESS</b></p>	<p><i>Project's draft ESMF shall be disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date</i></p> <p><i>ESMP or ESMP Checklist, shall be prepared during project implementation and shall be WB approved, disclosed, consulted and finalized before contracting and commencing works.</i></p> <p><i>ESMP or ESMP Checklist shall be integrated to bidding and contracting documentation.</i></p> <p><i>Project activities shall not commence before the ESMF is finalized and final version disclosed.</i></p> <p><i>Grievance mechanisms shall be available throughout project implementation</i></p> <p><i>Implemented throughout Project duration.</i></p>	<p>PIU</p>
<p><b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b></p>			

6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b>                  Relevant aspects of this standard shall be considered, as needed, under action 1.2 and 1.3 above, including risks to biodiversity, adverse impacts to habitats and impacts to protected areas and Natura 2000. If ESS6 is screened relevant to a particular activity, biodiversity risks and impacts shall be efficiently addressed through preparation and implementation of ESMP or ESMP Checklist, as defined in the ESMF (natural habitats and biodiversity protection measures will be integrated into ESMP/ ESMP Checklists for such sub-projects).                  For potentially impacted areas ESMP/ESMP Checklists will also reflect requirements of Natura 2000 Network management plans and protected areas management plans.</p> <p>No works triggering significant issues in sensitive and valuable areas shall be financed.</p>	<p><i>Project's ESMF will be disclosed, consulted prior to the appraisal.                  ESMP or ESMP Checklist, shall be prepared during project implementation and shall be WB approved, disclosed, consulted and finalized before contracting and commencing works.                  ESMP or ESMP Checklist shall be integrated to bidding and contracting documentation.</i></p> <p><i>Project activities shall not commence before the ESMF is finalized and final version disclosed.</i></p> <p><i>Implemented throughout Project duration.</i></p>	PIU
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS:</b> Chance find procedures shall be incorporated to ESMP/ESMP Checklist and as such part of all contracts involving any works under the project.</p>	<p><i>The chance finding procedures will be included in the ESMF. Project's draft ESMF shall disclosed prior to the appraisal. ESMF will be finalized, consulted, WB approved and re-disclosed within 30 days following Loan Agreement Effective date.</i></p>	PIU

8.2	<p><b>CULTURAL HERITAGE MANAGEMENT PLANS:</b> Prepare, adopt, and implement, the Cultural Heritage Management Plans (CHMP) for sub-projects that may impact protected cultural heritage buildings, archeological sites and zones and other such resources.</p> <p>Engage Cultural Heritage (CH) expert supervision of works at cultural heritage sites. CH expert will be a part-time, outsourced expert, not a member of PIU staff. CH expert will report to PIU Project Manager and will be engaged prior to commencement of works at CH sites.</p>	<p><i>Cultural Heritage Management Plans (CHMPs) shall be prepared, disclosed, publicly consulted and finalized as stand-alone documents or a part of ESMP or ESMP Checklist prior to Bidding of works and incorporated into Bidding documents</i></p> <p><i>ESMP or ESMP Checklist and CHMP shall be integrated to bidding and contracting documentation.</i></p> <p><i>Engage Cultural Heritage expert supervision for works at cultural heritage sites prior to works commencement.</i></p>	PIU
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>SEP PREPARATION:</b> Prepare SEP consistent with ESS10, in a manner acceptable to the Bank. Relevant aspects of this standard shall be considered, as needed, including action 1.2 and 1.3 above. As part of the ESMF, prepare, adopt, and implement measures to manage specific risks and impacts (such as behavior of project workers, labor influx, sexual exploitation and abuse or harassment, potential for community exposure to communicable diseases) to the community arising from Project activities; include these measures in the ESMP or the ESMP Checklists and other instruments to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p>	<p><i>Draft SEP shall be prepared and disclosed before Appraisal. The SEP shall be finalized, consulted, WB approved and redisclosed within 30 days following Loan Agreement Effective date</i></p>	PIU
10.2	<p><b>SEP IMPLEMENTATION:</b> The SEP may be amended and updated (and redisclosed) as needed during Project implementation.</p>	<p><i>Throughout Project life cycle</i></p>	PIU

10.3	<p><b>PROJECT GRIEVANCE MECHANISM:</b>                  Accessible grievance mechanism (GM) and grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.</p>	<p><i>The GRM shall be included in the SEP. Draft SEP shall be prepared and disclosed before Appraisal.</i></p> <p><i>The SEP (including the GRM) shall be finalized, consulted, WB approved and redisclosed within 30 days following Loan Agreement Effective date</i></p> <p><i>Maintenance and operation throughout project implementation. Regular maintenance of grievance database.</i></p>	<p><i>PIU (Project Manager)</i></p>
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS2	<p>Relevant Ministry Staff and PIU training on:</p> <ul style="list-style-type: none"> <li>- ESMF</li> <li>- SEP</li> <li>- ESMP/ESMP Checklist preparation, disclosure and oversight</li> <li>- LMP oversight</li> <li>- CHMP preparation, disclosure and oversight</li> <li>- World Bank ESF</li> </ul> <p>And other topics as relevant.</p>	<p><i>Throughout Project Implementation, at minimum once a year.</i></p>	<p><i>PIU Environmental Specialist and Social Specialist</i></p>
CS3	<p>Training for the contractors on implementation of environmental and social due diligence documents</p>	<p><i>Throughout of the project implementation, preferred timing would be after the signing of the contract and before commencement of works</i></p>	<p><i>PIU Environmental Specialist and Social Specialist</i></p>