

Republic of Croatia

State Geodetical Administration

INTEGRATED LAND ADMINISTRATION AND JUSTICE SERVICES PROJECT

**SUBPROJECT STAKEHOLDER ENGAGEMENT PLAN
STATE SURVEYS**

November 2025

1. Introduction

This Stakeholder Engagement Plan (SEP) outlines the approach for identifying, engaging, and communicating with stakeholders throughout the implementation of the State survey activities. The SEP is prepared within the Integrated Land Administration and Justice Services Project supported by the International Bank for Reconstruction and Development (IBRD) (hereinafter: World Bank), in line with World Bank Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure, which requires Borrowers to ensure meaningful, accessible, inclusive, and ongoing engagement with all project-affected parties.

The SEP focuses on the legally defined processes by relevant national legislation to ensure meaningful, inclusive, and transparent engagement, in line with ESS10.

2. Project description

The World Bank support the Ministry of Justice, Public Administration and Digital Transformation (MoJPADT) and the State Geodetic Administration (SGA) in the implementation of the Integrated Land Administration and Justice Services Project. The objective of the project is to (i) improve functional integration of Croatia's land registry and justice institutions; and (ii) enhance services for citizens. Project activities are:

Component A. Integrated Digital Land Registry and Court Services supports 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 supports enhanced geospatial data. Data from about two-thirds of counties in Croatia are not yet included in the infrastructure cadaster system. Collection, management and maintenance of data on built 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 support construction and refurbishment (and or reconstruction) of court, registry and cadaster infrastructure adhering to international and EU standards to support improved service delivery. This component will support civil works (construction of new integrated infrastructure or refurbishment of existing infrastructure) and design activities to support integrated cadaster, land registry and court services. This component will support design activities and construction of new integrated infrastructure in areas to include Novska and Bjelovar, design activities and refurbishment / reconstruction in Vinkovci and Zagreb Municipal Civil court (MCC) – Phase II. Additionally, this component will finance design activities of Zagreb Justice Square – phase II, Rijeka and Velika Gorica. This component will also support provision of new ICT cabling to improve digital services in thirty COs as well as small scale adaptation of branch offices of Zagreb Regional Office.

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 MoJPADT and SGA e-services by public and professional users; and (vi) management training.

3. State survey

The State survey is one of the activities of the Component C of the Project and the process of collection and processing of all necessary data for the purpose of establishing cadastral parcels, recording buildings, recording special legal regimes on land, recording land use, as well as preparing cadastral survey reports for the purposes of establishing the real property cadaster, and renewing/establishing and supplementing land registers. The cadastral survey is carried out by the SGA in agreement with the MoJPADT, while certain activities within the cadastral survey are performed by legal and natural persons authorized or possessing SGA permission to carry out expert geodetic tasks, selected through public procurement procedures. Right holders actively participate in all procedures within the survey, as follows:

- Marking boundary breakpoints and other land boundaries (hereinafter: boundaries) with visible permanent boundary markers,
- Measuring land boundaries and collecting data on cadastral parcels,
- Presentation of the cadastral survey report,
- Land register renewal, and
- Land register and cadastral documentation opening.

Key phases of the State survey:

Informing rights holders about cadastral survey

The cadastral survey is carried out for a specific area, and all interested persons in that area must be informed of its implementation. The Act on State Survey and Real Property Cadaster (OG 112/18, 39/22, 152/24) prescribes that the Decision on the Cadastral Survey is issued by the Director General of the State Geodetic Administration and that this Decision must be published in *the* Official Gazette. Information on the implementation of the cadastral survey is also published in local media and on the SGA website. In all local self-government units, within the area where the survey is being conducted, public meetings of citizens are held, where interested persons and land rights holders are informed about the importance and procedure of the cadastral survey, and their rights and obligations. At the main road entrances to the area under survey, signboards are placed indicating the site under the survey.

Marking of land boundaries with visible permanent boundary markers

The holders of rights to cadastral plots are invited in writing to mark the boundaries of the land and are obliged, within the deadline set by the Decision on cadastral survey and by the date stated in the invitation to mark, to carry out the marking of land boundary breakpoints. The professional assistance provided to them in this process and the permanent boundary markers used to mark the boundaries of the land are provided by experts who carry out geodetic work within the framework of cadastral survey free of charge.

Measuring land boundaries, collecting data and preparing reports

After the boundaries of the cadastral plots have been marked, the necessary measurements and data collection are carried out. The presence of the holders of rights and geodetic experts on the cadastral plots is mandatory during the measurement.

Presentation of the cadastral survey report

After the data has been collected and processed within the framework of cadastral survey, a cadastral survey report is prepared and presented to the holders of rights and persons possessing legal interest. The start of the presentation is announced in the public media (e.g. local radio station, cadastral office and local government unit bulletin boards). Rights holders are invited to appear in writing and are presented with the data stated in the census sheets and on the cadastral plan. In the process of presenting the study, the rights holder confirms that the data has been presented to him and signs a statement confirming that he agrees with the data presented in the census sheet and the extract from the cadastral plan. If the rights holder expresses disagreement with data on the cadastral parcel during the presentation, a note is drawn up. Based on such note, a new field inspection is required, after which the rights holder is invited to another presentation. If the rights holder still does not agree with the presented data and refuses to sign the statement, this is considered a complaint, which is submitted to the competent cadastral office for resolution, which decides on the complaint with an administrative decision containing instructions on legal remedies.

Land register renewal

After its presentation and quality control, the cadastral survey report is verified at the State Geodetic Administration Head Office, and a notification of the verified report is submitted to the MoJPADT and the competent court, which initiate a renewal of the land register. As part of the land register renewal, land registry extracts are drawn up, of which the court informs the right holders, and if necessary, hearings are held.

The notification instructs the right holders that, if they consider data in the draft land registry file to be inaccurate, they can exercise their rights in the corrective procedure, and the right holders are explained which data can be subject to complaints. Complaints relating to data on the cadastral parcel number, address, shape, surface area, development and the type of use of the cadastral parcel (sheet A I) are submitted to the competent cadastral office, while applications and complaints relating to the second section of the possession sheet (sheet A II), the ownership sheet (sheet B) and the encumbrances sheet (sheet C) of the LDB file are submitted to the competent court electronically via a notary public or lawyer.

Land register and cadastral documentation opening (procedure of providing public access to open cadastral and land registry data)

After the competent court has compiled all land registry files, it issues a decision to open the land register, which it submits to the State Geodetic Administration, on the basis of which the SGA Director-General issues a decision to open the cadastral documentation, which is published on the bulletin boards of the SGA, the competent municipal court, and in other manner deemed appropriate.

The cadastral documentation of the real property cadaster is opened on the day the land register is opened.

When the cadastral documentation is opened, the State Geodetic Administration publishes an announcement that the procedure for public access to the opened cadastral documentation is initiated on the bulletin board of the SGA, the e-Bulletin board of the competent municipal court, the competent cadastral office, the local government unit, or in other manner deemed appropriate.

The announcement is published at the same time as the announcement by the competent court on initiating the corrective procedure stipulated by the law governing the keeping of land registers.

The announcement states, among other things, that public access to data of the open cadastral documentation is allowed, inviting all persons who believe that something not entered in that cadastral documentation should be entered or that an entry should be changed, supplemented or deleted, to submit their complaints to the existing entries to the cadastral office or the City of Zagreb office within the specified deadline for public access to open cadastral documentation data.

The period for public display of open cadastral documentation data may not be shorter than one month or longer than three months, starting from the date of publication of the announcement on the bulletin board of the State Geodetic Administration.

Putting the cadastral documentation into use

The cadastral documentation is put into official use on the day of expiry of the deadline specified in the announcement.

Legal acts regulating the process of State Surveys are:

- Law on State Survey and Real Estate Cadaster (Official Gazette 112/2018, 39/22, 152/24)
- Land Registration Act (Official Gazette --)
- Ordinance on Cadastral Survey (Official Gazette 59/2020)

4. Objectives of the SEP

The key objectives of this SEP are to:

- Identify stakeholders with legally defined roles and interests in cadastral survey processes.
- Ensure early, clear, and accessible information to right holders and other interested stakeholders.
- Enable active participation of right holders and interested parties in all legally defined steps
- Ensure that parties can effectively protect their rights and interests through transparent procedures, including appeals and grievance mechanisms.
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

5. Principles of the SEP

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

- Engagement will be legally compliant with relevant national legislation regulating State surveys
- Engagement will be aligned with ESS10 (transparent, inclusive, and ongoing) and non-discriminatory (all right holders and interested parties are treated equally)
- Engagement will be documented: all notifications, meetings, and grievances are recorded
- Recognition that stakeholders are critical partners and not just “beneficiaries”
- Communication is based on a two-way flow that goes beyond a “public-relations” or information dissemination campaigns (one-way flow)
- Adoption of transparent, agile and accessible means for informed participation by diverse stakeholders with varying means and capacities
- Is based on a structured process allowing for stakeholders to become informed, process and analyze information, provide feedback, and receive reports back on whether and how their feedback was taken into account.

6. Key Risks & Mitigation Measures

Risks	Mitigation measures
Fear among right holders that the cadastral survey will cause loss of rights	Clear communication that the survey does not remove rights, simple-language information through multiple channels
Lack of participation in boundary marking, data presentation or public display of open cadastral documentation data	Multi-channel outreach (local radio, municipal boards, online), accessible materials
Land boundary disputes between neighbors during marking or data verification	Repeated notifications, individual invitations, flexible scheduling,
Misunderstanding of deadlines, procedures, rights to objection and appeal	Clear, repeated communication of deadlines; instructions at public display;
Misinterpretation of cadastral vs. land registry responsibilities	Communications of describing “who does what”; Early data requests to competent authorities;
Incorrect mapping of special legal regimes due to incomplete or outdated data	Strict TORs, monitoring, required training in SEP, LMP, GRM, Code of Conduct
Large volume of objections overwhelming COs, LROs, and courts	Multi-channel outreach for vulnerable groups (local radio, municipal boards, online) and adapted materials (large print, simple wording)
Errors in survey data (boundaries, areas, buildings, land use)	Transparent procedures, formal complaints and GRM established
Pressure, frustration or tense interactions between surveyors and citizens	Regular coordination between SGA, MoJPADT, COs, LROs, PIU, contractor (contracted geodetic firms)
Contractors failing to meet technical or E&S requirements	Strong emphasis in communication: absence does NOT cause loss of rights, multiple participation opportunities, explicit reassurance in all materials
Citizen confusion or misinformation	
Increased workload.	

Vulnerable groups unable to attend public display or understand documents Distrust of authorities	bilingual notices eventually and cooperation with minority councils (if needed)
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7. Stakeholder identification and analysis

Stakeholders	Brief description	Role within the Survey
Right Holders (including vulnerable groups)	Registered in the cadaster under previous regulations, owners, co-owners, authorized persons, managers of public goods and holders of real rights, persons in possession of a parcel or real estate but are not registered in the cadaster register or in the land register, and persons who have a legal interest in participating in the procedures of Cadaster survey	Must mark land boundaries with permanent visible boundary markers. They participate in: boundary marking, measurement and data collection on parcels and buildings, attending presentation of the study data and signing a statement of agreement with the presented data (or declare their disagreement). Are invited to a presentation for public display of cadastral data.
Legal and natural persons with a legal interest (including vulnerable groups)	Legal and natural persons with a legal interest	Participate based on their status and interest if the legal interest in initiating the procedure for implementing changes is proven (e.g. by a preliminary agreement or contract, a decision of a competent authority, the consent of the owner, or a request for the resolution of property relations)
Holders of rights under “special legal regimes”	Holders of rights under “special legal regimes” (easements, protection zones, concessions, etc.)	Their rights are recorded as “special legal regimes on land” during survey; their existence and documentation are ensured by competent authorities, participate based on their status and interest.
Residents / users in the survey area (including vulnerable groups)	May be owners, users, tenants, or informal possessors or just residents in the area under Survey	Need to be informed about survey scope, timings, and implications They can attend public meetings, public display, submit objections.
State Geodetic Administration	Central authority responsible for state survey and cadaster.	Proposes multi-annual and annual Programs to the Government in the part related to the real estate cadaster (with the consent of the MOJPADT). It is responsible for determining the areas where the cadastral survey will be conducted. Issues a Decision on the cadastral survey in accordance with the Program.

		<p>The SGA Central Office confirms the cadastral survey report after the completed presentation, and before the land register renewal.</p> <p>By decision of the Director, a person from the competent cadastral office is authorized to supervise cadastral survey tasks.</p> <p>Monitors contract implementation with the contractor and persons authorized to supervise.</p>
Local cadastral offices and the City of Zagreb cadastral office	Local cadastral offices and the City of Zagreb cadastral office	Keep area registers (regional parts of register of spatial units) and implement monitoring and supervision of on implementation of the cadastral survey at local level
Geodetical firms / contractors	Geodetical firms contracted after a procurement procedure-	Key roles include: execution of professional geodetic work (field and desk-based), preparation of the terrain, professional assistance and permanent boundary markers, set up signs marking the site, organization of public meetings to inform the public about the survey, prepares a cadastral survey report, presents the report to right holders, performs a field inspection if the right holder does not agree with the presented data and submits reports to the competent cadastral office in the event of a complaint.
Ministry of Justice, Public Administration and Digital Transformation	Policy making, strategic and coordinating authority over the land registry system.	Participates in coordination of the State survey, in particular in coordination with Municipal Courts – Land Registry Department (LROs) (ensuring synergy between the contractors, SGA, Cadaster offices (COs) and LR. Is responsible for prior approval of the multi-year and annual Programs proposed by SGA.
Municipal Courts – Land Registry Department	Maintain land registers.	Coordinate with SGA and the cadastral survey contractor, draw up draft LR files, and, if required, hold hearings.
Local Self-Government Units	Local Self-Government Units	<p>Support in the dissemination of information via local media.</p> <p>Host public meetings and support logistical aspects.</p> <p>Provide logistical support (providing space for field offices and presentation of cadastral survey reports) and network infrastructure (high-speed Internet).</p>

8. Stakeholder engagement activities implemented in line with national regulation and enhanced stakeholder engagement activities

The procedures for stakeholder information and engagement to be implemented by the Geodetic Contractor are elaborated in detail in the applicable regulatory framework and established practice and include standardized invitations, record-keeping, and regular reporting.

Standardized communication tools to be used by the Contractors already exist in the form of templates prepared by the SGA, including: written invitations, announcements for local newspapers, radio announcements, and guidance for rights holders distributed at public meetings and published on websites. Pre-designed leaflets, roll-ups, and posters are also available.

In addition, the SGA uses the publicly accessible website of the Multi-Annual Cadastral Survey Program¹ as an official information and communication tool for citizens and other stakeholders. The website publishes general information on the implementation of cadastral surveys and land register renewal, including a description of the procedure and its phases, the rights and obligations of rights holders, and the roles of the institutions involved. It also contains guidance for citizens on participation in the procedure, information on boundary marking and data presentation, and a list of documentation to be prepared during specific phases. Notices on the implementation of cadastral surveys by cadastral municipalities, frequently asked questions, information on the possibilities and procedures for submitting objections and appeals, relevant legislation and by-laws, and SGA contact details are also published. Communication tools, such as informational leaflets in PDF format, are available for download on the website.

By contract, the Geodetic Contractor has a contractual obligation to organize at least one public meeting, submit the meeting date to the SGA, prepare announcements in accordance with predefined templates and publish them in local newspapers (once), purchase radio airtime for message broadcasting (once), and organize meetings with public property managers and the State Attorney's Office (DORH), in accordance with applicable regulations. These activities represent the minimum standard of public information applied in all cadastral survey procedures.

However, within the State surveys to be implemented within the ILAJS existing communication mechanisms and the standardized communication tools will be enhanced by expanding the information conveyed to the population.

The following additional information will be incorporated into local newspaper announcements, radio messages, guidance for rights holders distributed at public meetings and published on websites, the content of the Multi-Annual Cadastral Survey Program website, and existing leaflets, roll-ups, and posters:

¹ <https://www.visegodisnijiprogram.dgu.hr/>

- information that persons who, due to disability, health conditions, or other objective reasons, are unable to participate in cadastral survey activities in person may request assistance from a close person or authorize another person to participate on their behalf, thereby reinforcing the inclusiveness of the procedure and ensuring that vulnerable groups have effective access to information and opportunities for participation;
- a request to residents to, at their own discretion, share information on the implementation of the cadastral survey with neighbors, family members, or friends who they believe may not receive the information through standard communication channels.
- Information that the absence does not lead to loss of ownership rights/titles.

The above enhancements to existing communication tools will be implemented under a separate communication campaign contract financed by World Bank funds. Such a campaign will use the upgraded tools and would also finance additional radio and local newspaper announcements.

9. Phases of Stakeholder Information and Engagement

Phase 1 – Decision on the Cadastral Survey

The SGA adopts a decision on the implementation of the cadastral survey. The decision is published in the Official Gazette, on the SGA website, other public media, and through local self-government units. The purpose of this phase is to formally inform the public about the commencement of the procedure and to ensure early awareness for all rights holders. No individual rights are determined at this stage; the phase serves to ensure transparency and to prepare stakeholders for subsequent phases of the procedure.

Phase 2 – General Public Information (prior to field activities)

The Geodetic Contractor carries out the following activities:

- installation of information boards at the main road entrances to the survey area;
- publication of announcements in local newspapers (one announcement financed by the Geodetic Contractor; additional announcements financed through the communication campaign);
- announcements on local radio stations (one announcement financed by the Geodetic Contractor; additional announcements through the SGA communication campaigns).
- organization of at least one public meeting, accompanied by the distribution of information materials (leaflets and oral guidance).

During public meetings, citizens may raise open questions and receive responses, and oral explanations are provided regarding the procedure, rights, and obligations. At this stage, the SGA verifies that the activities have been carried out (through the SNI system) and performs a review of the supporting evidence (announcements, photographs, minutes). This phase is of an informational nature and does not involve individual decision-making; however, it represents a key preparatory step for subsequent phases.

For the surveys implemented within the ILAJS project, complaints related to the conduct or communication of the contractor during this phase, which do not constitute statutory objections, may be submitted to the SGA central office.

Phase 3 – Invitation to Boundary Marking (individual interaction)

The Geodetic Contractor delivers written invitations to rights holders for boundary marking and provides permanent boundary markers and professional assistance in the field. This phase involves direct interaction with rights holders on site, joint boundary marking, and the collection of data obtaining consent. If a rights holder does not respond to the invitation, boundaries are determined based on neighboring parcels or existing cadastral data, and the procedure is not suspended. Non-response does not imply a loss of rights, and the rights holder retains the possibility to submit objections in later phases.

For the surveys implemented within the ILAJS project, complaints related to the conduct or communication of the contractor during this phase, which do not constitute statutory objections, may be submitted to the SGA central office.

Phase 4 – Presentation of the Cadastral Survey Elaboration

This phase is the key phase for lodging objections and appeals, or expressing disagreement with data presented. The Geodetic Contractor is obliged to present the cadastral survey elaboration to rights holders and other persons with a legal interest. At this stage, possible responses by citizens include:

- consent (confirmation of agreement);
- expression of disagreement, accompanied by oral and written explanations of the reasons.

In cases of disagreement, a record is prepared and a field inspection is conducted; if disagreement persists, the record is treated as a formal objection and submitted to the competent cadastral office. The competent cadastral office decides on the objection by administrative decision, against which an appeal to the SGA is permitted. The appeal does not have a suspensive effect.

For the surveys implemented within the ILAJS project, complaints related to the conduct or communication of the contractor during this phase, which do not constitute statutory objections, may be submitted to the SGA central office.

Phase 5 – Public Display of open Cadastral Data

The SGA publishes a notice on the public display of cadastral data, which lasts from one to three months. During this period, any person may review the data and submit an objection (in writing or orally). Objections are decided by the competent cadastral office by administrative decision, against which an appeal to the SGA is permitted, without suspensive effect. This phase allows for an additional verification of data and represents an important legal safeguard prior to the finalization of the cadastral records.

For the surveys implemented within the ILAJS project, complaints related to the conduct or communication of the contractor during this phase, which do not constitute statutory objections, may be submitted to the SGA central office.

Phase 6 – Renewal of the Land Register (judicial phase)

The court informs rights holders about the land register renewal procedure and delivers notifications on draft land register entries and invitations to hearings, as well as a public notice on the opening of the rectification procedure. During this phase, rights holders may submit their own documents and other

evidence for the protection of their rights. Objections related to ownership data and encumbrances are resolved within the rectification procedure, including through the filing of lawsuits for correction. The cadastral survey itself does not establish, transfer, or extinguish ownership rights; ownership is determined exclusively within land register procedures and judicial proceedings.

Phase 7 – Subsequent Legal Remedies

After the cadastral records and land register are put into official use, additional legal mechanisms for the protection of rights remain available. Data on cadastral parcels may be amended based on a verified geodetic elaboration and a final administrative decision, while ownership data may be corrected through rectification procedures, court judgments, and other legally prescribed procedures. This ensures that persons who did not participate in earlier phases or who come forward at a later stage have access to effective legal remedies.

10. Risks of exclusion of vulnerable groups

The overall risk of exclusion of vulnerable groups in the context of cadastral survey activities is assessed as low to moderate, due to the procedural nature of the survey, the multiple legally mandated notification phases, and the use of both mass and individual communication channels. Nevertheless, specific sub-groups may face heightened barriers to access or participation if targeted mitigation measures are not applied.

- Elderly persons and persons with reduced mobility as well as persons with disabilities or health-related limitations may experience physical constraints limiting in-person participation. This risk is mitigated through clearly identified contact points of the Geodetic contractor, as well as through the explicit and formally recognized option to participate via an authorized representative or a trusted close person.
- Risks faced by persons exposed to digital exclusion, including those with limited access to or familiarity with digital tools, are mitigated through the continued and systematic use of traditional communication channels. These include local newspapers, radio announcements, printed informational materials, and in-person public meetings, which remain integral components of the information and engagement strategy.
- Illiterate persons or persons with low literacy levels are assessed to represent a limited risk group, given the high national literacy rate and low incidence of illiteracy in the Republic of Croatia. However, to further reduce any residual risk of exclusion, the project incorporates radio announcements, oral explanations during public meetings, and direct field-level communication. These measures ensure that essential information, rights, and available procedures are accessible and understandable regardless of reading ability.
- Members of the diaspora and absent rights holders may face a higher risk of delayed or indirect access to information. This risk is mitigated through repeated public disclosures, individual invitation procedures where applicable, and the explicit encouragement of information sharing through family, neighbor, and local community networks. This layered communication approach helps ensure that information reaches persons who may not be physically present or reachable through standard channels.

Through the combination of these measures, the SEP applies a proportionate and inclusive stakeholder engagement approach that aligns with the principles of ESS10 and reduces the risk of exclusion.

Stakeholder engagement plan

Stakeholders	Benefits	Risks	Key Messages	Areas where Feedback is Sought	Methods for Engagement
Right holders (including vulnerable groups)	<ul style="list-style-type: none"> - Legal certainty of parcel boundaries and area - Updated records - Easier future transactions (sales, inheritance, mortgages) - Free cadastral survey (no survey cost for right holders) 	<ul style="list-style-type: none"> - Fear of losing land or rights - Boundary disputes with neighbors - Lack of understanding of procedures, deadlines, and legal effects 	<ul style="list-style-type: none"> - The cadastral survey does not take away rights; it records the actual situation and improves legal certainty - Participation in boundary marking, data checking and public display is an opportunity to protect your interests - Absence from meetings does not automatically cancel your rights - GRM and formal objections/appeals are available 	<ul style="list-style-type: none"> - Accuracy of parcel boundaries, area and land use - Correct identification of right holders and co-owners - Formal objections, appeals or grievances 	<ul style="list-style-type: none"> - Local media (newspapers, radio, online portals) - Notice boards at access points to the survey area - Postal invitations to boundary marking, field measurements, presentation of elaborates, and public display - Individual sessions during presentation of cadastral survey elaborates - Public access to open cadastral documentation data - Formal objection and appeal procedures - SGA website and information materials
- Legal and natural persons	- Opportunity to align cadastral	- Lack of awareness that they may	- You have the right to request changes	- Clarity of instructions on	- Local media

with a legal interest (including vulnerable groups)	<p>data with legal documents (contracts, court decisions)</p> <ul style="list-style-type: none"> - Clearer situation for ongoing or future legal procedures 	<p>participate and submit documents</p> <ul style="list-style-type: none"> - Risk that their interests are not reflected if they are passive 	if you have a legal interest and supporting documents	<p>how to prove legal interest</p> <ul style="list-style-type: none"> - Formal objections, appeals or grievances 	<ul style="list-style-type: none"> - Notice boards Public displays Formal objection and appeal procedures <p>SGA website</p>
- Holders of rights under “special legal regimes”	<ul style="list-style-type: none"> - Accurate spatial representation of protected areas, infrastructure corridors etc. - Stronger legal enforceability 	<ul style="list-style-type: none"> - Incomplete or outdated data provided to SGA - Later disputes if special regimes are wrongly mapped 	<ul style="list-style-type: none"> - Importance of timely and complete data delivery to ensure correct reflection of special legal regime 	<ul style="list-style-type: none"> - General understanding of the cadastral survey 	<ul style="list-style-type: none"> - Local media (newspapers, radio, on line portals) - Public displays - SGA website - Phone and e-mail communications
- Residents / users in the survey area (including vulnerable groups)	<ul style="list-style-type: none"> - Better quality spatial data and maps for local planning and services- Indirect improvement of legal security in the area 	<ul style="list-style-type: none"> - Misperception that all residents must take individual actions 	<ul style="list-style-type: none"> - Clarify who must take action and when - benefits for local development and planning 	<ul style="list-style-type: none"> - General understanding of the cadastral survey 	<ul style="list-style-type: none"> - Local media (newspapers, radio, on line portals) - Notice boards on all major access points to the area under Survey - Public displays - SGA website

<ul style="list-style-type: none"> - State Geodetic Administration / PIU 	<ul style="list-style-type: none"> - Modernized, higher-quality cadastral aligned with land registry - Improved reputation due to transparent and participatory process - Experience in applying WB ESF 	<ul style="list-style-type: none"> - External risks (e.g. large number of objections, political pressure, media criticism) - Perception of bureaucratic or non-transparent procedures 	<ul style="list-style-type: none"> - SGA is committed to lawful, transparent and inclusive implementation - SEP and GRM established to complement legal procedures 	<ul style="list-style-type: none"> - Adequacy of engagement methods - Functioning of formal objections and appeals, - GRM and handling of objections 	<ul style="list-style-type: none"> - Phone and email communication - Coordination meetings with MoJPADT, cadastral offices, and LROs - Internal reporting and supervision
<ul style="list-style-type: none"> - Regional cadastral offices and the City of Zagreb cadastral office 	<ul style="list-style-type: none"> - Updated cadastral operations - Sinergy of data with LRO, improved legal certainty - Increased trust from citizens 	<ul style="list-style-type: none"> - High volume of inquiries during State survey - Pressure from citizens regarding disputed boundaries or issues not within COs competence 	<ul style="list-style-type: none"> - The state survey will improve data accuracy, reduce future workload 	<ul style="list-style-type: none"> - Identification of eventual bottlenecks in service provision during survey phases - Feedback on cooperation with surveyors, municipalities, LROs, and special-regime authorities etc. - Observations on vulnerable groups who struggle with 	<ul style="list-style-type: none"> - Coordination meetings with SGA central office - Email/phone communication

				access or understanding	
- Geodetical firms / contracts	- Professional experience carrying out surveys - Opportunity to apply WB ESF and strengthen reputation	- Pressure from tight deadlines - Tense interactions with right holders in disputes -	- Clear technical specifications and expectations from SGA - Requirement to respect code of conducts, Labor management procedures and SEPs and share information on GRM - GRM also available for complaints on contractor conduct	- Clarity and feasibility of work plans - Feedback on typical citizen questions and disputes	- Regular coordination meetings with SGA/PIU - Reports through SNI - Email/phone communication
- Ministry of Justice, Public Administration and Digital Transformation /PIU	- Improved legal security and reduced court caseload - Improved public services, fewer disputes - Stronger institutional coordination between MoJPADT,	- Increased short-term workload for LROs - Misunderstanding by citizens regarding the Ministry's role -	- The cadastral survey improves legal certainty, and reduces long-term burden on courts - Digital transformation will enhance access to land information for all citizens	- Issues arising from State survey that require court involvement - Measures to improve public communication and reduce misunderstanding	- Phone, e-mail communication and meetings with MOJPADT, SGA and local self-government units, COs and LROs. - Regular reporting - Participation in GRM review

	SGA, COs and LROs				
- Municipal Courts – Land Registry Department	- Synergy of data between cadaster and land registers Reduced future workload due to fewer unclear cases	- Increased short-term workload during survey - Risk of citizen confusion between cadastral and land registry issues	- States survey is an opportunity to clean up legal discrepancies - Clear referral of citizens to the correct institution (cadaster vs. land registry)	- Coordination procedures between SGA, MOJPADT, COs and LROs	- Phone, e-mail communication and meetings with MOJPADT, SGA and local self-government units, COs and LROs.
- Local Self-Government Units	- More accurate data for spatial planning, local development - Higher attractiveness and investment potential in the area	- Complaints from citizens about lack of information or support - Political sensitivity of disputes between neighbors or vulnerable groups	- State survey supports is a fair and transparent process - Local authorities are partners in informing citizens and organizing meetings	- Practical issues in organizing public meetings and information campaigns	- Coordination meetings - Provision of ready-made info materials for bulletin boards and websites - Email and phone communication - Participation in public meetings
- Local and national media	- Opportunity to inform the public about an important reform improving legal security and transparency	- Misinterpretation or sensationalist reporting	- SGA can provide accurate information on State survey - Media can help prevent misinformation	- Clarity and timeliness of press materials	- Press releases and media briefings - Provision of fact sheets, Q&A documents - Provision of standardized radio and newspaper announcement

<ul style="list-style-type: none"> - Vulnerable groups: Roma communities, elderly, persons with disabilities, low-income households, diaspora / absent owners, informal land users 	<ul style="list-style-type: none"> - Better recognition of de facto land use and occupation (within legal constraints) - Potential for improved access to services and future regularization processes 	<ul style="list-style-type: none"> - Not receiving or understanding notifications - Inability to attend meetings or public display - Distrust of authorities and fear of negative consequences 	<ul style="list-style-type: none"> - State survey does not legalize or punish - Special efforts made to ensure you can participate - Absence does not automatically remove rights, but participation helps protect them 	<ul style="list-style-type: none"> - Barriers in accessing information and procedures - Specific needs for adapted communication (language, format, location, timing) 	<ul style="list-style-type: none"> - Local media (newspapers, radio, on line portals) - Notice boards - Invitations (postal notices) to boundary marking, field measurements, presentation of cadastral survey report (elaborate), public display of cadastral data - Individual Sessions during presentation of Cadastral Survey Report - Public displays - Formal objections and appeals - SGA website - Accessible information materials (simple language, large font)
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11. Previously implemented stakeholder engagement activities

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

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

Following the reconstruction of the project the SEP has been updated to reflect changes in project activities the E&S instruments were disclosed and published on the project dedicated page of the MoJPADT and SGA.

This sub-project level stakeholder engagement plan (State Survey SEP) was subject to public consultations with no comments received, and will also be published on the project dedicated page of the implementing agencies web site. Furthermore, the sub-project level engagement plan will be presented to management staff of cadaster and judicial bodies during dedicated meetings.

12. Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints, feedback, questions and suggestions from citizens and affected communities at the level of the project. The mechanism focuses not only on receiving and recording complaints but also on ensuring that they are addressed in a timely and appropriate manner. While feedback and concerns should, wherever possible, be handled at the level closest to where they arise, all complaints are registered and processed in accordance with the procedures described below.

Key definitions of grievance and complaint are as follows:

- Complaint: an expression of dissatisfaction that is related to an impact caused by a project activity, which has affected an individual or group. Adversely, the interests of an individual or group and the individual or group want a proponent or operator (or contractor) to address and resolve it. A complaint is normally of a less serious nature than a grievance;
- Grievance: a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected by a project activity which, if not addressed

effectively, may pose a risk to operations and the livelihood, well-being or quality of life of the claimant(s). The grievance mechanism described in this section includes both complaints and grievances.

Given the highly regulated nature of cadastral surveys in the Republic of Croatia, it is important to clearly distinguish between statutory legal remedies and the Project GRM. The Project GRM is not intended to resolve legal cadastral disputes, including disputes related to parcel boundaries, ownership rights, encumbrances, or other matters that are strictly regulated by law. Such matters are addressed exclusively through legally prescribed procedures under the Act on State Survey and Real Property Cadaster and the Land Register Act, including objections during prescribed phases, administrative review by competent cadastral offices, appeals to the State Geodetic Administration (SGA), and judicial proceedings.

In this context, the Project GRM functions primarily as a support, facilitation, and referral mechanism, and is intended to:

- facilitate coordination and follow-up between contractors, cadastral offices, the SGA, and the Project Implementation Unit (PIU);
- ensure transparent tracking and reporting of grievances relevant to project implementation
- provide information and guidance to stakeholders on applicable legal remedies and competent authorities;

Complaints and grievances may be submitted at any stage of the cadastral survey process, regardless of the procedural phase. The following institutional contact point is publicly disclosed and serve as formal access points for grievance submission:

State Geodetic Administration
Gruška ulica 20
10000 Zagreb
Tel: +385 1 616 54 04
Fax: +385 1 616 54 84
info@dgu.hr

Grievances may be submitted through multiple channels, including: in person; in writing; verbally by telephone; by email; by fax. No mandatory standardized grievance submission form is required, in order to avoid unnecessary administrative barriers and to ensure accessibility of the mechanism for all stakeholders, including vulnerable and underserved groups.

At the project management level, the Project Implementation Unit (PIU) will request that the State Geodetic Administration forward all complaints received through the above channels. These complaints are tracked, coordinated, and reported within the framework of the Project GRM.

As a general rule:

- receipt of a grievance is acknowledged to the complainant within five (5) working days;
- resolution of the grievance, or referral to the competent authority, is undertaken within thirty (30) days, depending on the nature of the issue and institutional competence.

Grievances are examined and addressed within the mandates of the relevant institutions. Where irregularities in contractor performance are identified, corrective measures may be required by the SGA in line with contractual and regulatory provisions.

The Project GRM is operationally integrated into the existing supervision and oversight framework of the cadastral survey system. Grievances are received through institutional channels, addressed within the competencies of cadastral offices and the SGA, and monitored by the PIU for project reporting purposes. This approach ensures effective grievance handling and oversight without establishing parallel or duplicative grievance structures, and remains proportionate to the level of social risk and the expected volume of grievances.

Worker Grievance Mechanism

In addition to the above, contractors and subcontractors are required to ensure that a grievance mechanism is available to all workers engaged under the project. Workers are informed of the existence of this mechanism, and it is designed to be easily accessible, confidential, and free of retaliation.

13. Monitoring and reporting

The procedures for informing and engaging stakeholders that must be implemented by the Geodetic Contractor are elaborated in detail in the applicable regulations and established practice, and include standardized invitations, record-keeping, and regular reporting. All contractor activities (including public meetings, media announcements, field-level invitations, minutes, and supporting evidence) are planned and monitored through the State Geodetic Administration's application system "System of New Surveys (SNI)" and OSS Presentation.

Within the SNI system, a dynamic survey plan is defined by survey phases, a monthly obligation to upload evidence (invitations, announcements, receipts, photographs, minutes and data collected through surveying) is prescribed, and oversight and validation by the State Geodetic Administration (SGA) both at the central and local cadaster office level are enabled. The system is used, inter alia, to monitor the technical supervision plan (implemented by a designated person within the competent local cadastral office), the contractor's dynamic work plan (approved by the supervising authority and the responsible person at the SGA central office in Zagreb), the status of all contracted activities, and evidence of actions undertaken (photographs, documents, receipts, announcements, etc.).

The Geodetic Contractor is subject to continuous supervision by the SGA through a two-tier oversight structure. The first level of supervision over the implementation of the survey is carried out by a designated person within the competent local cadastral office, who monitors the implementation of activities both in the field and within the SNI system. The person responsible for supervision at the local cadastral office level prepares monthly progress reports on the activities implemented. The second level of supervision and coordination is carried out by the SGA central office in Zagreb, which, through the SNI system, approves the contractor's dynamic plans, reviews the status of activities, and, where necessary, issues instructions or requests corrective measures.

Considering the above, all stakeholder engagement and outreach activities carried out by Geodetic Contractors are documented, evidenced and monitored through the SNI system. Contractors are required to upload evidence of completed engagement actions and activities (invitations, publications, meeting minutes, photos, receipts and other supporting documentation) and to submit monthly reports on implementation progress and engagement actions. The competent local cadastral office supervisor and the SGA central office review and verify evidence and progress in SNI, enabling continuous oversight and quantitative/qualitative monitoring of SEP implementation.

With regard to grievance management, complaints and grievances are received through the formally disclosed institutional channels related grievances. The SGA ensures that information on such complaints, including their status and resolution, is systematically communicated to the Project Implementation Unit (PIU) for the purposes of project-level monitoring, coordination, and reporting under the Project GRM.

At the project level, the PIU consolidates information received from the SGA on stakeholder engagement activities and grievances and includes this information in regular project monitoring and reporting. This includes summaries of engagement activities implemented by Geodetic Contractors, the number and type of complaints received, the status of their resolution or referral to statutory legal mechanisms, and any corrective measures applied. Upon request, this information is made available to the World Bank for project supervision and compliance review.

Stakeholder information and outreach activities implemented under the separate communication campaign are monitored and documented in accordance with the campaign contract and reporting requirements. The PIU oversees implementation of the communication campaign and consolidates information on campaign activities (including media outputs, public events, and distribution of materials) together with SGA and contractor-level engagement data. This consolidated information forms part of the overall SEP monitoring framework and is reported to the World Bank as part of regular project progress reporting.