



ELMED Etudes SARL

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Tunisia-Italy Power Interconnector Project

Environmental and Social Impact Assessment (ESIA)

Section 11 – Environmental and Social Management Plan (ESMP)

Draft for Consultations

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1. INTRODUCTION

This document contains the Environmental and Social Management Plan (ESMP) for the project, i.e. the management tool that provides the assurance that the mitigation measures developed for the significant impacts identified by the ESIA are implemented and maintained throughout the project lifecycle. The ESMP outlines management strategies for safety, health and environment stewardship in the project implementation and defines how the project proponent's commitments will be implemented to ensure sound environmental practice.

The objectives of the ESMP are to:

- Describe the committed construction, operation and decommissioning management measures to be implemented as outlined in the ESIA;
- Describe specific additional measures required to implement construction related good practice, World Bank Group requirements and national legislation;
- Identify the roles and responsibilities of the environmental and social management organization of the Project;
- Communicate environmental and social expectations and requirements within the Project team.

The ESMP refers to the planned works of the Elmed project financed by the World Bank, which comprise all activities in Tunisia, both marine and terrestrial. All works in Italy are considered as Associated Facilities and are therefore not included in the scope of the present document.

2. ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES

The proposed environmental and social measures to reduce and mitigate the Project's impacts during the project development, preconstruction, construction, operation and maintenance, and decommissioning phases are summarized in the following tables.

For each potential impact, the proposed management measures are described, together with parties responsible for their implementation.

Whereas key biodiversity management measures for flora and fauna are included in this ESMP, more detailed management measures are outlined in the Biodiversity Management Plan (BMP).

It is noted that measures proposed for the decommissioning phase should be considered merely conceptual, given the uncertainty regarding when and how decommissioning will take place.

2.1 Project development

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Stakeholder Engagement and Human Rights (including SEA – Sexual Exploitation and Abuse and SH – Sexual Harassment)	<ul style="list-style-type: none"> Stakeholders and local communities not meaningfully consulted and informed of the project impacts and benefits Protests and disruptions form potential affected persons (PAPs) Failure to obtain community acceptance of the project Lack of transparency with the public; non-ability of individuals and civic groups to participate in public life; lack of freedom of information and Control of corruption (transparency/participation in public life); gaps in facilitating citizen engagement; lack of participation in public life. 	<ul style="list-style-type: none"> Faulty or incomplete implementation of the SEP Absence of consultation with project affected persons (PAP) and local authorities 	<ul style="list-style-type: none"> Development and implement an ESS10-compliant Stakeholder Engagement Plan (SEP) Development and Implementation of SEAISH plan Implementation of the SEP and conduct of meaningful engagement with local and affected stakeholders Conduct of a stakeholder mapping exercise to identify PAPs and vulnerable groups Development of a stakeholder database Revision and updating of Project social baseline Provision of information on employment opportunities that will be offered by the project Development and Implementation of Grievance Redress Mechanism Hiring and training of Community Liaison Officers (CLOs) 	During design phase [STEG]	<ul style="list-style-type: none"> Absence of complaints from stakeholders (local communities, NGOs and authorities) Record keeping of stakeholder and community meetings 	<ul style="list-style-type: none"> Development of SEP budgeted in World Bank's TA Project SEP Execution Plan: \$ 30,000 Implementation of SEP throughout Project Development, Implementation and Operation Phases: \$ 120,000 Development of SEAISH plan budgeted in World Bank's TA Project SEAISH Execution Plan: \$ 30,000 Implementation of SEAISH plan: \$ 100,000
Land Acquisition, Restrictions to Land Use and Involuntary Resettlement	<ul style="list-style-type: none"> Non-identification of PAPs Gaps in Entitlement Framework (focus on legal compliance/informal settlers) Lack of focus/gaps in livelihood restoration Social conflicts and project failure Absence of social license to operate and community support Lack of compensation for physical/economic displacement 	<ul style="list-style-type: none"> Incorrect design of the OHL Line route designed without any consultation with stakeholders (authorities, local communities, NGOs, etc.) 	<ul style="list-style-type: none"> Develop and implement a ESS5-compliant Action Plan (RAP) based on the Resettlement Policy Framework (RPF) Identification of potential impacts and PAPs (landowners/users, land use, valuation, etc.) Effective participation of local stakeholders and PAPs and authorities in the entire process 	RAP to be developed at least 6 months prior to the start of the construction phase [STEG]	<ul style="list-style-type: none"> All PAPs, including informal settlers are consulted prior to the commencement of construction works Absence of complaints from stakeholders and PAPs RAP adopted prior to construction works 	<ul style="list-style-type: none"> Development of Resettlement Framework budgeted in TA Project Development of RAP, including LRP: \$ 90,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Terrestrial biodiversity	<ul style="list-style-type: none"> Impacts on habitats/species conservation concern (forest, shrub, wetlands, IBARAMSAR, flora and fauna) Disturbance and loss of natural habitats Increase of mortality for species (flora, birds, bats) 	<ul style="list-style-type: none"> Incorrect design of the OHL Missing information on critical habitats and vulnerable species Line route designed without any consultation with stakeholders (authorities, local communities, NGOs, etc.) 	<ul style="list-style-type: none"> Design team to include fauna (ornithologist) experts to conduct specific surveys in order to identify critical natural habitats/species and sites with high risk of mortality for birds and bats Conduct a monitoring survey for birds, bats and other critical species within the OHL corridor and near the existing power transmission line Definition of adequate mitigation measures for habitats/critical species 	During design phase [Design Contractor / STEG]	Monitoring	Monitoring costs included in Environmental and Social Monitoring Plan. Design measures and team included in project design costs
EMF	Increase in general public exposure to EMF	Converter stations, OHL, terrestrial underground cables	Project layout definition and siting of new facilities aimed at ensuring that no direct impact on sensitive receptors occur: CS and OHL siting, cable route definition mostly on existing roads	Measure incorporated into the Project design [Design Contractor / STEG]	Monitoring	Included in project design cost
Landscape	Visual impacts and changes of landscape features	Converter stations	Project layout definition and siting of new facilities aimed at ensuring that no direct impact on sensitive receptors occur.	Measure incorporated into the Project design [Design Contractor / STEG]	-	Included in project design cost
Landscape, vegetation	<ul style="list-style-type: none"> Visual impacts and changes of landscape feature Loss of natural vegetation 	Construction works (removal of vegetation)	Design restoration of pre-construction conditions as much as possible (e.g. re-vegetation) in temporary construction yards and construction areas Design for: <ul style="list-style-type: none"> Rainwater tank De-oiling tank Civil discharges connected to the public sewerage 	Measure incorporated into the Project design [Design Contractor / STEG]	-	Included in project design cost
Soil and Groundwater	Potential soil/groundwater contamination	Accidental fuel or hazardous materials spills	Design for: <ul style="list-style-type: none"> Rainwater tank De-oiling tank Civil discharges connected to the public sewerage 	Measure incorporated into the Project design [Design Contractor / STEG]	-	Included in project design cost
Marine biological environment	<ul style="list-style-type: none"> Disturbance of benthic habitats Disturbance of pelagic environment 	<ul style="list-style-type: none"> Marine cables' landfall construction Marine cable laying in the nearshore (up to 40m depth) Marine cable laying in deep waters 	<ul style="list-style-type: none"> HDD will be used for the construction of the marine cables' landfall, avoiding direct interferences with the coastal environments and related habitats Design for applying the best available technologies suitable to local seabed features 	Measure incorporated into the Project design [STEG]	Monitoring	Included in project cost

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Marine biodiversity	<ul style="list-style-type: none"> Disturbance of benthic habitats Disturbance of pelagic environment 	Marine operations cables laying	<ul style="list-style-type: none"> Desktop study to provide information on potential presence of biodiversity in the area of works Overview of potential impacts of the marine cables on marine biodiversity Project route study to avoid sensitive habitats Nearshore and offshore surveys to describe benthic habitats 	Activities already carried out [ELMED]	Survey reports	Activities already carried out

2.2 Pre-construction and construction phase

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Air quality	Increase in atmospheric concentration of Particulate Matter induced by dust diffuse emissions	<ul style="list-style-type: none"> Excavation, levelling, compacting and gravelling of the construction site, access road and construction yard; Aggregate material handling/stockpiling at the construction site, access road and construction yard; Wind action on exposed surfaces; Vehicle transit on unpaved construction areas. Land clearing activities, levelling, excavation, grading for the installation of towers' foundations and the needed access roads. 	<ul style="list-style-type: none"> Watering unpaved surfaces to reduce wheel generated dust Vehicle speed limited to 40 km/h, reduced to 15-20 km/h on the construction site, to minimize dust generated by the transit of vehicles Covering/humidifying of materials that can be transported by wind (e.g. topsoil, aggregate) where possible; this measure allow to abate by 90% dust resuspension caused by winds on active stockpiles (WRAP Fugitive Dust Handbook). All stockpile materials with high risk to produce airborne dust will be covered, in particular during windy periods. 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Monitoring Inspections by the Contractor of access roads and construction sites for excessive nuisance due to dust. Contractor shall maintain records of complaints on dust, and follow-up with corrective measures 	\$ 1,500 x 40 months = \$ 60,000
Noise	Increase in atmospheric concentration of macro pollutants (primarily NOx and CO) induced by vehicles and machinery exhaust emissions	<ul style="list-style-type: none"> Heavy equipment (e.g. bulldozers, graders, rollers,) and engine-driven machinery (e.g. drilling machines, pumps etc.) involved in the construction activities; Exhaust emissions from light and heavy-duty vehicles travelling to and from the construction sites (induced traffic emissions). 	<ul style="list-style-type: none"> Use of best available technologies for equipment and machinery; Regular maintenance and inspection of machinery performed in accordance with manufacturer instructions; Vehicles and machinery will be turned off when not in use 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Monitoring Inspections by the Contractor of all equipment and machinery used during construction. Contractor shall maintain records of complaints on air quality, and follow-up with corrective measures 	Included in the construction contract
Noise	Increase in background noise levels due to construction equipment and machinery	Use of heavy equipment and machinery during civil works	<ul style="list-style-type: none"> Switch off equipment when not in use; Limit noise activities to the least noise – sensitive time of the day; Location of noise equipment as far as practicable from nearby receptors Regular maintenance of equipment and machinery in order to ensure noise emissions in accordance with technical specifications All major construction plant and equipment will comply with international noise emission limits Transportation activities and the delivery of construction materials during working hours Notify local community/public located within 500 m from the worksites before starting noise activities (residents must be informed at least 24 hours in advance) Vehicle movements shall be limited to a speed limit of 30 km/h 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Inspections by the Contractor of construction areas for excessive noise nuisance. Contractor shall maintain records of complaints on noise and follow-up with corrective measures Noise level within standard fixed by local authority and by International Standards Maintenance logbook of vehicle and machinery 	Included in the construction contract
Geology, geomorphology and soil	Potential soil and subsoil contamination	<ul style="list-style-type: none"> Leaks from the use of construction machinery and storage of fuel refueling activities Discharge of wastewater 	<ul style="list-style-type: none"> Operational procedure to prevent and manage potential soil and subsoil contamination Excavated soil management procedures Providing emergency response kits 	Development prior to, and implementation during, construction phase	<ul style="list-style-type: none"> Inspections by the Contractor Hazardous materials management plans 	\$ 5,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
	<ul style="list-style-type: none"> Potential soil disturbance and degradation 	<ul style="list-style-type: none"> Inadequate management of solid waste Accidental spills of hazardous and non-hazardous material Drilling fluids (bentonite sludge) and cuttings associated to HDD operation Excavation activities and opening borrow pits for material to be used for the installation of towers Inadequate management of excavated materials 	<ul style="list-style-type: none"> Use the best available technologies for the equipment and machineries Periodic maintenance of the equipment Contaminated soil should be stripped and stored on suitable impermeable surfaces Waste management procedure (segregation of hazardous and non-hazardous waste; Implement a construction equipment/material inventory management system; Ensure regular surveillance of any spillage on nearby properties: land filling must be restricted within the boundary of project's activities (HDD site, CS area and locations of towers foundations) Drilling and drilling mud management procedures 	<ul style="list-style-type: none"> Development prior to, Contractor Approval and control: STEG 	<p>approved by STEG prior to initiation of Construction phase.</p> <ul style="list-style-type: none"> Soil surface/volume contaminated (target=0) Rate of treated contaminated soil (target=100% of stripped and stored volume) 	
	<ul style="list-style-type: none"> Potential soil disturbance and degradation 	<ul style="list-style-type: none"> Land clearing and vegetation removal in worksites and under the line corridor Machinery operations and movement of vehicles during the construction Excavation activities 	<ul style="list-style-type: none"> Excavated topsoil will be stored in a dedicated topsoil storage site When construction work is over, topsoil will be reinstated at the construction site. Excavations with appropriate slopes to keep the excavation face safe. Temporary construction yards will be restored Restoration of compacted soils by tilling. Conduct specific survey on the OHL corridor to avoid areas with high risk of erosion/landslide Anti-erosion actions (corrective measures) on areas affected by erosion. 	<ul style="list-style-type: none"> Development prior to, and implementation during, construction phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Soil surface affected (compacted, eroded) Topsoil stored and brought back to its original site Rate of treated compacted soil Excess spoil and soil covered with topsoil and revegetated Number of operations on eroded areas 	\$ 20,000
	<ul style="list-style-type: none"> Land take 	<ul style="list-style-type: none"> Construction yards Construction of access roads Temporary worksites Land clearing and excavation activities 	<ul style="list-style-type: none"> Preliminary assessment of construction sites to be used by the Contractor Optimization/reducing of construction site number (i.e using the Mlaâbi site as a construction site) Adequate site restoration after construction activities are completed 	<ul style="list-style-type: none"> Development prior to, and implementation during, construction phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Number of used construction sites 	\$ 30,000
Freshwater Resources (Surface Groundwater)	<ul style="list-style-type: none"> Potential groundwater contamination Alteration of groundwater 	<ul style="list-style-type: none"> Leaks from the use of construction machinery and storage of fuel Refueling activities Discharge of wastewater Inadequate management of solid waste Accidental spills of hazardous and non-hazardous material Drilling fluids (bentonite sludge) and cuttings associated to HDD operation 	<ul style="list-style-type: none"> Operational procedure to prevent and manage potential soil and subsoil contamination: Waste management procedures Excavated soil management procedures Drilling and drilling mud management procedures Providing emergency response kits Use the best available technologies for the equipment and machineries Periodic maintenance of the equipment Contaminated soil should be stripped and stored on suitable impermeable surfaces Ensure regular surveillance of any spillage on nearby properties: land filling must be restricted 	<ul style="list-style-type: none"> Development prior to, and implementation during, construction phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Inspections by the Contractor Hazardous materials management plans approved by STEG prior to initiation of Construction phase. No pollution detected All contaminated materials adequately stored No complaints from stakeholders (local communities, NGOs and authorities) 	\$ 5,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Biodiversity Terrestrial section -	<ul style="list-style-type: none"> Loss of natural vegetation and habitats (habitat fragmentation) Disturbance and loss of fauna Introduction of invasive species Impact on ecosystem service (species with high value and providing services for local community or for carbon sequestration/regulation of water flow/erosion prevention and maintenance) Lighting and Biodiversity: The issue of artificial light from vehicles, machines and light bulbs at camps raises a potential biodiversity issue in terms of migratory birds and bats. Artificial lighting is known to present a risk to bat foraging success and calls for a lighting strategy and use of suitable (eg. yellow band with lighting, avoidance of UV lighting). Similar considerations may apply to the sub-stations and their operation. 	<ul style="list-style-type: none"> Excavation activities and opening borrow pits for material to be used for the installation of towers Inadequate management of excavated materials Corridor vegetation cutting and clearing for the installation of towers and OHL Filling, levelling and grading of land Towers construction: tower foundations, tower assembly and erection, attachment of the conductors and improvement of access roads. Earth movement, aggregate material handling, excavation, mechanical works and vehicle movements Use of engine driven vehicles and machinery (i.e. excavators, bulldozers, side booms, trucks, cars): injuring and crushing plants within the corridor Construction yards Construction of access roads 	<p>within the boundary of project's activities (HDD site, CS area and locations of towers foundations)</p> <ul style="list-style-type: none"> Preliminary assessment of construction sites to be used by the Contractor (minimum distance to keep from watercourses and reservoirs) The Contractor must integrate the results/recommendations of the BAP to ensure the protection of natural habitats and species Consult with the competent authorities (Ministry of Agriculture and Forest Department DGF, APAL) and stakeholders (association and NGO such as AAO and ATVS) prior to any vegetation removal and clearing) Undertake an additional floral/fauna inventory during wet season to verify if there are any protected species within the project's area, in particular for "<i>Leopoldia maritima</i>" (considered as vulnerable VU by IUCN) and the "<i>Thorectes puncticolis</i>" (considered as EN by IUCN) around the HDD construction sites Provide training for workers on biodiversity value and need to avoid any disturbing or destroying flora and fauna Conserve the connectivity and integrity of existing natural water channels to reduce impact of vegetation removal on herpetofauna, invertebrates and other species Avoid construction activities during breeding/nesting season in forested areas and near IBA/RAMSAR sites Avoid complete clearing of the RoW and protect trees located adjacent to the construction sites Demarcate the boundaries of construction areas (CS, towers, HDD, HVDC, access roads) and vegetation disturbance will be limited to within the boundaries and train workers to remain within demarcated construction sites Integrate natural topographical features into the project construction plans to conserve the natural topography of the construction areas Use existing roads as far of possible to reach the construction sites and restrict movement of construction vehicles (heavy machines) strictly to pre-designated routes Ensure an adequate management of spoil and soil to prevent any damage outside the construction areas Offset the loss of any natural vegetation removed along RoW of the OHL and near the 	<ul style="list-style-type: none"> Development prior to, and implementation during, construction phase Development: Contractor and Social Approval and control: STEG Monitoring activities: Monitoring Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Compliance with BAP guidelines Area of lost/disturbed vegetation Number of complaints from stakeholders (local authorities, AAO, ATVS) 	\$ 30,000 Flora/fauna inventory included in Environmental and Social Monitoring Plan costs Lighting strategy: \$ 5,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Biodiversity Avifauna	<ul style="list-style-type: none"> Habitat alteration and disturbance (breeding and nesting) 	<ul style="list-style-type: none"> Removal of vegetation, trampling and clearing of RoW of the OHL line. These activities will lead to the alteration of natural habitat used by birds for feeding and roosting. Removal of trees and shrubs Construction of tower foundations Dust and waste generated by heavy machines and vehicles Noise generation due to the operation of vehicle and machinery Potential oil/fuel spill 	<ul style="list-style-type: none"> CS and along the access roads used during construction phase At the end of construction, all disturbed areas and used roads must be restored Reduce external soil supply (from other regions) to avoid any introduction of invasive species Noise mitigation/management measures (see above) Limiting of vehicles speed, preventing possible wildlife-vehicles collisions 	Development prior to construction phase <ul style="list-style-type: none"> Development: Monitoring Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Compliance with BAP guidelines All disturbed areas are completely repaired 	\$ 10,000 Monitoring costs included in Environmental and Social Monitoring Plan costs
	<ul style="list-style-type: none"> Monitoring of bird mortality (collision and electrocution): conduct a field survey of bird mortality on the existing power transmission lines in Cap Bon region to identify areas with high risk for birds. This survey will help the Contractor to optimize the design of OHL line and avoid passing through these high-risk areas. A qualified ornithologist will be involved with the design team. The monitoring should cover all the area to be crossed by the OHL line and around the existing power transmission lines, it will also allow to: <ul style="list-style-type: none"> Identification of priority sites (IBA and RAMSAR sites near the OHL corridor and used by birds) and avifauna species, such as <i>Neophron percnopterus</i> (Egyptian vulture, EN), <i>Falco cherrug</i> (Saker Falcon, EN), <i>Falco vespertinus</i> (Red-footed Falcon, VU) and other considered highly vulnerable due to the risks of collision and electrocution due to the presence of power transmission lines. Other bird species are likely to have their feeding and/or nesting sites disturbed due to construction activities, such as <i>Oxyura leucocephala</i> (White-headed Duck, EN), <i>Marmaronetta angustirostris</i> (Marbled Teal, VU) and other water birds. Awareness and training plans for workers with the participation of DGF department and AAO (NGO) Implementation of monitoring activities during construction works Consult stakeholders and local community to collect information on bird incidents or hits and areas with high risk of mortality should be identified Before establishing the final design of the OHL, bird-use areas (breeding, nesting, etc) should 					

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Biodiversity - Bats	<ul style="list-style-type: none"> Habitat alteration and disturbance Loss of habitat for bats 	<ul style="list-style-type: none"> Removal of vegetation, trampling and clearing of RoW of the OHL line. These activities will lead to the alteration of natural habitat used by bats for feeding and roosting. Removal of trees and shrubs used by foliage roosting bats. Construction of tower foundations Dust and waste generated by heavy machines and vehicles Noise generation due to the operation of vehicle and machinery Potential oil/fuel spill 	<p>be reported to guide appropriate routing of the OHL and its roads access</p> <ul style="list-style-type: none"> Assessing potential species that may be present on the RoW of the OHL line (field survey) to verify the absence of some bat species along the construction areas, such as Myotis capaccinii (VU), Miniopterus schreibersii (VU), Rhinolophus blasii (LC), etc. (in particular near mountain areas Beni Ayech, Djebel Ressay and Zaghouane) Use of existing roads as far as possible to reduce any disturbance for bat habitats by vegetation removal Clearance of vegetation should be minimized, in particular for OHL sections crossing areas occupied by forest and shrub (near Beni Ayech, between Grombalia and Jebel Ressay) Given the small foundation footprint of towers, minimize the length/volume of woody vegetation clearance Keep existing vegetation in the RoW as floral species present in the region will never reach the conductor The Contractor should integrate bat protection during the design of the OHL line and towers should be placed away from wetlands and any water points Waste management procedure to avoid/reduce any waste accumulation on construction site Switching off engines not in use to reduce noise duration and intensity 	<p>Development prior to, and implementation during, construction phase</p> <ul style="list-style-type: none"> Development: STEG and Approval and control: STEG 	<ul style="list-style-type: none"> Compliance with BAP guidelines All disturbed areas are completely repaired 	<p>Flora/fauna inventory included in Environmental and Social Monitoring Plan costs</p> <p>All other costs included in project costs.</p>
Landscape	<ul style="list-style-type: none"> Visual disturbance and physical changes of the landscape features due to the construction sites and activities 	<ul style="list-style-type: none"> Land clearance and removal of existing vegetation Earthmoving, levelling, excavation and back-filling activities Land clearing activities, levelling, excavation, grading for the installation of towers' foundations and the needed access roads Vehicle transit and transportation activities Temporary presence of active workites with storage of materials and equipment 	<ul style="list-style-type: none"> Rehabilitate disturbed areas around construction sites in order to restrict extended periods of exposed soil Restore temporary workites immediately after construction (e.g. once construction operations of a tower are completed and before moving on to the next tower the previous tower construction site should be restored and all generated materials and waste removed). Maintain construction sites in orderly condition and do not distribute material over many sites before usage Planting of screening trees around Converter Station areas 	<p>Development prior to, and implementation during, construction phase</p> <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Inspections by the Contractor All affected areas are restored after construction activities No complaints from stakeholders (local communities, NGOs and authorities) 	\$ 30,000
Marine biodiversity - General	<ul style="list-style-type: none"> Displacement of species Removal of benthic species 	<ul style="list-style-type: none"> Seabed disturbance Potential contaminant release from sediment Underwater noise and disturbance from vessel and installation activity 	<ul style="list-style-type: none"> Use HDD for the construction of the marine cables' landfill, avoiding direct interferences with the coastal environments and related habitats Use the best available technologies suitable to local seabed features 	<p>Throughout construction phase</p> <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Approval of STEG on cable route Approval of STEG on cable laying techniques to be used 	<p>Included in the construction contract</p>

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Marine biodiversity - <i>Posidonia oceanica</i> and <i>Cymodocea nodosa</i>	<ul style="list-style-type: none"> Uprooting Increased sedimentation Establishment of <i>Caulerpa sp.</i> in <i>P. Oceanica</i> habitats (Kelibia, Tunisia) 	<ul style="list-style-type: none"> Seabed disturbance 	<ul style="list-style-type: none"> Plan works to avoid periods of migration of sensitive species Reduce residence time of vessels and related equipment in marine waters 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Approval of STEG on action plan presented by contractor Number of inspections carried out by STEG on the implementation of the action plan Average residence time of vessels and related equipment in marine waters kept to a minimum 	Included in the construction contract
Marine biodiversity - Actinopterygii and Chondrichthyes	<ul style="list-style-type: none"> Increased turbidity Suspension of contaminants Alteration of sediments Displacement of species due to noise and overall disturbance during cable laying activities 	<ul style="list-style-type: none"> Seabed disturbance Vessel and installation machinery 	<ul style="list-style-type: none"> Use HDD for the construction of the marine cables' landfill, avoiding direct interferences with the coastal environments and related habitats Use the best available technologies suitable to local seabed features for minimizing sediment disturbance and suspension. Plan works to avoid growth period of <i>Caulerpa sp.</i> (Kelibia, Tunisia) 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Real-time turbidity measurements Real-time measurement of contamination in the water column Real-time measurement of increases of temperature Average residence time of vessels and related equipment in marine waters kept to a minimum 	Included in the construction contract
Marine biodiversity - Aves	<ul style="list-style-type: none"> Avoidance of area of works 	<ul style="list-style-type: none"> Noise generated by vessels Noise generated by marine cable installation operations 	<ul style="list-style-type: none"> Reduce residence time of vessels and related equipment in marine waters 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Average residence time of vessels and related equipment in marine waters kept to a minimum 	Included in the construction contract
Marine biodiversity - Bivalvia and Anchozoa	<ul style="list-style-type: none"> Increased turbidity Suspension of contaminants Alteration of sediments Dislodging of species in the cable burial site 	<ul style="list-style-type: none"> Seabed disturbance 	<ul style="list-style-type: none"> Use HDD for the construction of the marine cables' landfill, avoiding direct interferences with the coastal environments and related habitats Use the best available technologies suitable to local seabed features for minimizing sediment disturbance and suspension. 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Real-time turbidity measurements Real-time measurement of contamination in the water column Real-time measurement of increases of temperature Number of species dislodged in the cable burial site 	Included in the construction contract

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Marine biodiversity - Reptilia	<ul style="list-style-type: none"> Increased turbidity Avoidance of area of works Accidental collision with cable laying vessels 	<ul style="list-style-type: none"> Seabed disturbance Underwater noise and disturbance from vessel and installation activity 	<ul style="list-style-type: none"> Observers on board of ship Use the ploughing technique on the remaining route for cable laying in deep waters therefore minimizing sediment disturbance and suspension. Reduce residence time of vessels and related equipment in marine waters 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Hiring of MMO Real-time measurements Average residence time of vessels and related equipment in marine waters kept to a minimum 	\$ 2,000 x 4,5 months = 9,000 USD
Marine biodiversity – Mammalia (Cetaceans)	<ul style="list-style-type: none"> Avoidance of area of works Accidental collision with cable laying vessels 	<ul style="list-style-type: none"> Underwater noise and disturbance from vessel and installation activity 	<ul style="list-style-type: none"> MMOs during construction Reduce residence time of vessels and related equipment in marine waters 	Throughout construction phase <ul style="list-style-type: none"> Implementation: Contractor Control: STEG 	<ul style="list-style-type: none"> Hiring of MMO Average residence time of vessels and related equipment in marine waters kept to a minimum 	\$ 2,000 x 4,5 months = 9000 USD
Land use and livelihood impacts	<ul style="list-style-type: none"> Economic displacement of farmers using lands within the RoW of the OHL (with or without legal compliance such as farmers on state-owned land) Restriction of farming within the RoW with consequent livelihood impacts Reduction of areas available for agricultural activities 	<ul style="list-style-type: none"> Corridor vegetation cutting and clearing for the installation of towers (OHL) Earth movements Construction yards Construction of access roads Exclusion/safety zone along RoW 	<ul style="list-style-type: none"> Clearance and vegetation removal activities to be restricted to the minimum area Strictly follow procedures of the Resettlement Framework Policy (RFP) and the Resettlement Action Plan (RAP), to be conducted before the construction phase) Monitoring and update of the RAP/LRP: socio-economic baseline that screens and identifies PAPs, additional assistance for severely affected persons/ vulnerable groups, compensation at replacement value, reinstatement after construction etc. The borrower to ensure full compensation is paid to PAPs in compliance with the RPF and RAP. 	Development prior to, and implementation during, construction phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> All PAPs compensated of non-compliance reports Absence of complaints received from stakeholders Number of public grievances 	Included in the cost budgeted in the Resettlement Framework and to be updated in the RAP
Archaeological and cultural heritage	<ul style="list-style-type: none"> Potential disturbance or destruction of archaeological sites and/or objects. 	<ul style="list-style-type: none"> Civil works in general: site preparation, excavations and earthworks 	<ul style="list-style-type: none"> Develop and implement a chance find procedure. Training of workers about the value of historical and cultural heritage For the OHL consult with INP experts before choosing the final location of towers and access roads. 	Development prior to, and implementation during, construction phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Disturbance of archaeological sites and/or objects. Number of complaints received from stakeholders (authorities and civil society) 	\$ 10,000
Community health and safety	<ul style="list-style-type: none"> Risk of accidents and physical injuries involving residents from increased road traffic Trespass by unauthorized persons into construction work areas with consequent risk of accidents / injury and/or loss of livestock (e.g. local herders) 	<ul style="list-style-type: none"> Construction activities Worksites 	<ul style="list-style-type: none"> Require all Contractors and Subcontractors to comply with relevant STEG's health and safety requirements Prepare and implement an ESS2 and ESS4-compliant Community Health and Safety Plan Prepare and implement a Traffic and Transport Plan prior to the start of any transport activity to ensure that the transport process is properly and adequately managed Ensure that work sites are fenced off and that signs are posted around work faces and construction sites to inform people of the risks associated with trespassing 	Development prior to and implementation during, construction phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Community Health and Safety Plan approved by STEG before starting of works Training records Records of accidents Records of complaints 	Community Health and Safety Plan: \$ 70,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
	<ul style="list-style-type: none"> Increased stress-related disturbances (noise, dust, light, and air pollution). Potential health risks due to limitations to access local healthcare facilities. Sexual Abuse/sexual harassment (SEA-SH) of seasonal workers and migrants 	<ul style="list-style-type: none"> Construction activities Transportation and traffic Presence of the construction workforce The provision of health care for the workforce (both primary and secondary, i.e. hospital care) has the potential to affect access to health care for communities (due to competition for resources) with the potential for worsening health outcomes Low quality of the local public transportation services and limited healthcare facilities. Presence of Project workforce from outside the Project area 	<ul style="list-style-type: none"> Fluorescent strips to delimit other areas of the construction site prohibited to the public Installation of panels indicating and informing local population about the progress of the work Undertake a program of stakeholder engagement and consultation to raise awareness among local communities of the risks of trespassing on sites, the meaning of signs and the dangers of playing on or near equipment or entering fenced areas Notify landowners along the line route about the construction schedule and activities. Emergency Response Plan (ERP), taking into account access to health care, major incidences, multiple casualty events and pandemics. Develop and implement a Code of Conduct for Project Workers throughout the Supply Chain; implement the SEA-SH Action Plan Development of training and awareness-raising activities on SEA-SH; Development of grievance mechanism for seasonal workers and migrants Prepare a Supply Chain Management Plan and ensure that contractors implement it Take all necessary precautions and make proactive and thorough investigations to ensure the origin and sourcing of 		<ul style="list-style-type: none"> Community Health and Safety Plan approved by STEG before starting of works Training records Records of work accidents Distributional accident data Grievances related to community health and safety in grievance log reports Number of Education and Awareness trainings on safety risks of entering construction areas (for both workers and local communities) Capacity/need assessment of equipment and personnel of hospitals and emergency health facilities. Number of interactions, agreements entered with suitable healthcare facilities. Contractors complying with STEG's code of conduct; Number of awareness-raising activities; Number of workers participating to awareness-raising activities; Number of allegations or complaints from 	

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Labor influx	<ul style="list-style-type: none"> The influx of project workers (and/or in-migration of opportunists) could lead to impacts on the health, safety and security of the community, such as risky diseases, inappropriate conduct, as well as SEA-SH risks for women form the local communities. There are H&S and social risks related to worker accommodation / worker camps for project workers, including labor influx and in-migration Pressure on local infrastructure (e.g housing, health) from influx of project workers, including inflation in the cost of housing and food 	<ul style="list-style-type: none"> Influx of project workers Arrival of opportunistic in-migrants 	<p>equipment, components, materials and other supplies used in the construction of the converter stations, the underground line and the OHL so that they are not manufactured and supplied by firms (or subcontractors) that do not comply with the policies and standards of the donors</p> <ul style="list-style-type: none"> Categorically prohibit and ban (i) the abusive employment of children or vulnerable persons and (ii) the practice of forced labor, human trafficking and slavery in line with the LMP 	<p>Development prior to, and implementation during, construction phase</p> <ul style="list-style-type: none"> Implementation: <ul style="list-style-type: none"> STEG (direct workers); Contractor (contracted workers); Primary Suppliers (primary supply workers) Control: STEG 	grievance mechanism.	Influx Management Plan: \$ 70,000
			<ul style="list-style-type: none"> Prepare and implement an Influx Management Plan in accordance with the World Bank Good Practice Note - "Assessing the Risk of Adverse Impacts on Communities from Project-related Labor Influx, June 2021" Monitor for influx and associated impacts (e.g. inflation, social conflict) in accordance with the Influx Management Plan Carry out culturally appropriate engagement with local communities to raise awareness of SEA-SH risks, including via separate women-only engagement forums Establish, communicate and implement a Project Hiring Policy, maximizing local employment to minimize the risk of uncontrolled influx / in-migration and ensure that contractors abide by this policy To address the risk of an increase in prostitution and teenage pregnancies, carry out regular awareness-raising in the local communities of the project Contractor to induce workers to the Code of Conduct and strictly enforce the Code of Conduct to prevent unwanted behavior Carry out regular training of contract workers on key social risks and issues, including SEA-SH Prohibit access by unauthorized personnel into the worker camps and work areas Carry out periodic sensitization forums for employees on ethics, morals, general good behavior and the need for the project to co-exist with the neighbors, in line with the Project Code of Conduct 		<ul style="list-style-type: none"> Demographic change in local communities Incidence of STDs and teenage pregnancies Incidence of crime Number of grievances Incidence of social issues (eg SEA-SH, crime) Monitoring cost of basic goods and services 	

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Occupational Health and Safety (OHS)	<ul style="list-style-type: none"> Working on construction sites involves generic H&S risks for workers, as it increases the risk of injury or death from accidents Discrimination and sexual violence or harassment within workers Risks of exposure to chemicals and electromagnetic fields 	<ul style="list-style-type: none"> Inadequate H&S risks assessment and prevention; Inadequate maintenance of tools and machinery; Inadequate PPE or incorrect use of PPE; Workers' potential misconduct and discriminatory/discriminating behavior; Lack of skills/experience of workers. 	<ul style="list-style-type: none"> Establish a Project Accommodation Strategy and determine whether a camp-based or a distributed (community-based) accommodation approach will be followed Engage with the communities on whether camp or distributed accommodation approach is preferable. If a camp-based strategy is followed, engage with the communities on the best siting for the camps If a camp-based strategy is adopted, prepare and implement a Worker Accommodation Plan in accordance with the applicable content of the IFC/EBRD publication entitled: "Workers' accommodation: processes and standards - A guidance note (2010) Inform all non-local temporary workers of the duration of contract and the expectation that they will leave the area when contract expires 	Development prior to, and implementation during, construction phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Submission of OHS Plan Preparedness and Response Plan Number of workers attending OHS training; Hours of OHS training/worker Rate of contractors' compliance with STEG's OHS procedures; Number of trainings or awareness activities on human rights and discrimination; Number of complaints regarding discrimination and sexual harassment within SC; Number of trainings on pesticides hygiene; Number of injuries at work; Number of injuries with absence; Number of casualties; Number of tools/machineries that have been maintained in the last three months; 	OHS Plan: \$ 65,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
			<ul style="list-style-type: none"> Only allow workers with experience or technical skills to perform activities on electrical systems or cables; Appoint supervisors monitoring the compliance with OHS procedures during activities on electrical systems or cables; Before starting excavation activities, carefully map the position of other underground service cables; Implement an Electromagnetic Fields Safety Program; Provide workers with personal exposure monitoring equipment and shielding materials; Train workers on hygiene practices concerning pesticides and provide adequate PPE; Analyze PCB levels around the existing conversion station and provide adequate PPE. Prepare a Framework H&S Plan for Workers and Communities Require Contractors to prepare a H&S Plan for Workers and Impacted Communities that meets the requirements of the STEG Plan and addresses issues including: Implement measures to prevent the spread of HIV/AIDS (e.g. through the provision of free condoms to workers), and other communicable diseases such as Covid-19 Ensure compliance with ESS2 and Tunisian OHS legislation Carry out periodic sensitization forums for employees on ethics, morals, general good behaviors and the need for the project to co-exist with the neighbors Adopt a Project Code of Conduct that covers key issues such as SEA-SH and related issues Equipment of the camps with sanitary facilities, septic tank, bins, dumpsters, etc. Installation in the camps of a rest area and a canteen equipped to be able to heat up food; Development of awareness-raising activities on sexual harassment for workers along SC 		<ul style="list-style-type: none"> Number of workers provided with PPE adequate to their tasks; Number of OHS supervisors; PCB levels around conversion stations; Power of electromagnetic fields in work areas. 	

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Employment, Income and LWC	<ul style="list-style-type: none"> Unfair working conditions (including unfair treatment, discrimination, including gender-based discrimination (e.g. unequal pay, SEA-SH), discrimination against vulnerable workers, child and forced labor, non-observance of basic rights such as freedom of association and collective bargaining) Corruption, lack of ethics and integrity, on the part of contractors and primary suppliers Unrealized opportunities for local employment (e.g. failure to give priority for unskilled work to local community members) Unrealized opportunities to train local workers (e.g. key vocational skills, good OHS practices) Failure to provide local communities with timely information on work opportunities and requirements 	<ul style="list-style-type: none"> Use of contractors and primary suppliers (workers engaged through third parties) High unemployment rate and skills gap in the local project areas Prevalence of irregular employment and unfair terms of employment in the Project's Area of Influence 	<ul style="list-style-type: none"> Adopt a Human Resources Plan, in line with the Project Hiring Policy Staff grievance policies and mechanisms for complaints about unfair treatment, unfair working conditions or sexual harassment Implementation of the Labor management procedure (LMP) and contractor LMPs (C-LMP) (Contractors and Primary Suppliers) Implement the Code of Conduct The Project contractor will develop and implement a transparent recruitment process and communicate the same through the project area via leaders and via the CLOs to manage expectations and opportunistic influx Priority for unskilled employment will be given to the local community to minimize in-migration Maximize local employment opportunities and provide training and upskilling 	Throughout construction phase <ul style="list-style-type: none"> Implementation: STEG (direct workers); Contractor (contracted workers); Primary Suppliers (primary supply workers) Control: STEG 	<ul style="list-style-type: none"> Number and reports of STEG's activities related to pre-engagement, background screening and ongoing due diligence of construction contractors and primary suppliers, including evidence of labor-related remediations. Number of individual contracts of employment issued in accordance with national law's and WB's ESF requirements Number of toolboxes talks on labor law issues and the number of grievance mechanism during construction. Number of complaints filed in the grievance mechanism regarding discrimination, sexual harassment or working conditions; Number of awareness-raising activities regarding sexual harassment; Number of workers participating to awareness-raising activities. Number of individual training registers Grievances related to fishing activities in grievance log reports 	\$ 65,000
Infrastructures and Public Services	<ul style="list-style-type: none"> Increased traffic and disturbance of traffic flow Possible damage to infrastructure during construction activities; Temporary limitation in access to health facilities; Increased pressure and potential disruption to local utilities for households reliant on local services (e.g., electricity, water, waste); Temporary disruptions to local utilities. 	<ul style="list-style-type: none"> Worksites in general (CS, OHL, terrestrial cables); HVDC underground cables route along existing roads; Establishment of temporary, construction-associated facilities Unreliable water supply, inadequate waste separation and treatment facilities and high rates of waste production in the Project's footprint.; 	<ul style="list-style-type: none"> Adopt and implement a Corporate Social Responsibility (CSR) policy, with specific commitment to avoid, minimize, mitigate, offset and/or compensate all Project's potential adverse impacts on Infrastructures, Utilities and Services. Implement the Project Stakeholder Engagement Plan Waste management plan Grievance Policy and Procedure Prepare and implement a Transport and traffic management plan 	Development prior to, and implementation during, construction phase <ul style="list-style-type: none"> Development: STEG and Contractor approval and control: STEG 	<ul style="list-style-type: none"> Transport and traffic management plan approved by STEG before starting of works Number of focused consultations with specific stakeholders whose livelihood activities are close to construction activities 	\$ 55,000

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
		<ul style="list-style-type: none"> Maintenance of underground cables. 	<ul style="list-style-type: none"> Notify landowners along the line route about the construction schedule and activities Geophysical survey to ascertain the presence of utilities services along terrestrial cable Engagement with utilities with underground cables or pipes along STEG's cables lines; Development of grievance mechanism regarding disruption to utilities caused by Project activities 		<ul style="list-style-type: none"> Reinstatement (km) of roads damaged as a result of the movement of project vehicles or construction activities Capacity assessment of local utilities companies before construction phase Number of consultations with utilities companies Grievances related to infrastructures and public services in grievance log reports 	

2.3 Operation phase

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Geology, geomorphology and soil	Potential soil and subsoil contamination in the converter station area	<ul style="list-style-type: none"> Equipment and maintenance activities in the CS area Accidental spillage of transformer oil from CS site Surface runoff from spillage site Maintenance equipment Inadequate management of waste 	<ul style="list-style-type: none"> Waste management procedures Maintenance protocols Providing emergency response kits Site specific Emergency Response Plan prepared for clean-up and decontamination Presence of a rainwater management system at the CS Periodic maintenance of the equipment and ensure proper spill control and management at site and along the OHL line Monitor and detect any contamination on soil 	Project lifetime/ STEG	<ul style="list-style-type: none"> Plans to be adopted prior to beginning of operation phase. Visual inspections during operation phase Soil contaminated (target=0) Rate of treated contaminated soil Number of complaints received from stakeholders (authorities and civil society) 	\$ 3,000 x year
Freshwater Resources (Surface and Groundwater)	<ul style="list-style-type: none"> Potential groundwater contamination Alteration of groundwater 	<ul style="list-style-type: none"> Equipment and maintenance activities in the CS area Accidental leakage and spillage of fuel and chemical stored that can contaminate the surface water body and wetlands located in the proximity Failure of the rain waters and oily water drainage and management system of CS 	<ul style="list-style-type: none"> Waste management procedures Maintenance protocols Providing emergency response kits Site specific Emergency Response Plan prepared for clean-up and decontamination Presence of a rainwater management system at the CS Periodic maintenance of the equipment and ensure proper spill control and management at site and along the OHL line Monitor and detect any contamination on soil 	Project lifetime/ STEG	<ul style="list-style-type: none"> Plans to be adopted prior to beginning of operation phase. Visual inspections during operation phase Soil contaminated (target=0) Rate of treated contaminated soil Number of complaints received from stakeholders (authorities and civil society) 	\$ 2,000 x year
Air quality	<ul style="list-style-type: none"> Increase in atmospheric concentration of macro pollutants (NOx and Cox) Potential fugitive emissions of SF6 	<ul style="list-style-type: none"> Vehicles employed for maintenance activities during 	<ul style="list-style-type: none"> Maintain all vehicles and equipment if SF6 is to be used, equipment with low leakage 	Project lifetime/ STEG	<ul style="list-style-type: none"> Emissions monitoring Visual inspections 	\$ 2,000 x year

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Noise	<ul style="list-style-type: none"> Increase of noise level due to the operation of CS Increase of noise due to the operation of OHL line 	<ul style="list-style-type: none"> operation phase Operation of transmission line and CS station (insulator for electrical switching equipment, cables, transformers, etc.) Operation of the transformer units and the cooler systems, which are the key noise emission; Wind effect, in case of strong winds Corona effect due to the electrical discharges during the OHL operation 	<ul style="list-style-type: none"> rate must be used as a priority Provide training for maintenance staff on good maintenance practices to prevent SF6 leakage Planting and maintaining trees surrounding the CS to reduce noise for human and ecological receptors Conduct noise monitoring/inspection in case of complaints from communities 	Project lifetime/ STEG	<ul style="list-style-type: none"> during operation phase Noise level is within standard fixed by local authority and by WBG standards Absence of complaints from local residents 	\$ 2,000 x year
Biodiversity (flora-fauna)	Loss/disturbance of vegetation and habitat due to routine clearance of RoW	<ul style="list-style-type: none"> Vegetation maintenance activities on RoW Accidental leakage and spillage of fuel or chemical from stored electrical equipment 	<ul style="list-style-type: none"> No chemical products to be used during vegetation maintenance under the RoW Vehicle movements shall be limited to a speed limit of 20 km/h in forest areas and near wetlands sites 	Project lifetime/ STEG	Visual inspections during operation phase	-
Biodiversity-Bird	<ul style="list-style-type: none"> Habitat fragmentation Increase of mortality of birds by collision or electrocution 	<ul style="list-style-type: none"> Presence of the OHL transmission line considered as a physical barrier and potential disruption of the 	<ul style="list-style-type: none"> Bird diverters should be installed in places considered as bird-use or with high risk of collision Conduct an annual monitoring of avifauna Assessment of mitigation measure effectiveness 	Project lifetime/ STEG	<ul style="list-style-type: none"> Visual inspections during operation phase Compliance with the requirements of the BAP plan 	Markers, diverters and other mitigation measures included in the cost of the project.

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
		<p>aerial habitat along the RoW</p> <ul style="list-style-type: none"> Accidental leakage and spillage of fuel and chemical stored from electrical equipment 	<ul style="list-style-type: none"> Conducting regular revisions of measures taken to protect birds Monitoring of birds perching, in particular for raptors species, after construction of the transmission line in order to identify "high birds perching" areas Install "raptor roost deterrents or anti-roosting devices" (pole cap/cone, bird spider, bird spikes) to reduce the electrocution risk Increase the visibility of the OHL line by installing line markers: aerial spheres (using different colors, with light to increase visibility at night, to be placed in the center of the span), spirals and bird flight diverters (reduce the line vibration and increase visibility); suspended devices, tree wires to prevent collision and electrocution of birds Provide bird nesting platforms on some pillars Add insulation to poles and wires in order to reduce any risk of electrocution of birds Restrict maintenance activities to the daily time Vehicle movements shall be limited to a speed limit of 20 km/h in forest areas and near wetlands sites Maintenance activities should be planned outside breeding season for most resident species including bats Vehicle movements shall be limited to a speed limit of 20 km/h in forest areas and near wetlands sites 		<ul style="list-style-type: none"> No mortality of birds No nest destroyed during maintenance operations 	<p>Monitoring costs are detailed in Environmental and Social Monitoring Plan</p>
Biodiversity-Bat	<ul style="list-style-type: none"> Habitat alteration and disturbance Increase of Bat mortality (collision and electrocution) 	<ul style="list-style-type: none"> Vegetation maintenance activities on RoW Vehicle movement during maintenance activities Accidental leakage and spillage of fuel 		Project lifetime/ STEG	<ul style="list-style-type: none"> Visual inspections during operation phase Compliance with the requirements of the BAP plan No mortality registered 	-

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Occupational Health and Safety (OHS)	There will be some generic risks to workers health and safety from working on operational sites, as it increases the risk to injury or death due to accidents	<ul style="list-style-type: none"> and chemical stored from electrical equipment Maintenance and operation activities 	<ul style="list-style-type: none"> Prepare an OHSP and adopt its recommendations/provisions of the OHSP. Training specific to plant and site Carry out regular audits Install signs on transmission towers with information on public safety risks and emergency contact information in Arabic and French. 	Project lifetime/ STEG	<ul style="list-style-type: none"> Training records Records of work accidents 	\$ 25,000
Economy, Employment and LWC	<ul style="list-style-type: none"> Unfair working conditions (including fair treatment, non-discrimination, vulnerable workers, gender pay gaps and sexual harassment, child and juvenile labor, freedom of association and collective bargaining) Corruption, ethics, integrity, sustainability of contractors and primary suppliers 	<ul style="list-style-type: none"> Use of contractors and primary suppliers (workers engaged through third parties) Worksites High unemployment rate 	<ul style="list-style-type: none"> Human Resources Policy and Procedures Staff grievance policies and mechanisms for complaints about unfair treatment or unfair working conditions Worker Code of Conduct Labor management procedures (Contractors and Primary Suppliers) Code of Ethics 	Project lifetime/ STEG	<ul style="list-style-type: none"> Number and reports of STEG's activities related to pre-engagement, background screening and ongoing due diligence of contractors and primary suppliers, including evidence of labor-related remediations. Number of individual contracts of employment issued in accordance with national law's and WB's ESF requirements Number of toolbox talks on labor law issues and the number of grievance 	Operation budget

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Community Health, Safety, and Security	<ul style="list-style-type: none"> Safety risk to the local communities once the project is operational Risks of electrocution 	<ul style="list-style-type: none"> Converter stations High voltage Lines Local communities' concerns over safety issues associated with the project once it is operational, which could affect community wellbeing and their perception of the safety of the project. 	<ul style="list-style-type: none"> Grievance Procedure Corporate Responsibility (CSR) policy Community education program on safety to alleviate concerns. STEG operational policies and procedures (safety)Installation of warning and awareness panels against the dangers of high voltage at the various sites and along the transmission line 	Project lifetime/ STEG	mechanism during construction.. <ul style="list-style-type: none"> Number of panels of education and awareness interactions on safety risks related to the project during the operational phase Number of grievances related to safety risks in grievance log reports 	\$ 35,000

2.4 Decommissioning phase

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Air quality	Increase in atmospheric concentration of Particulate Matter induced by dust diffuse emissions	<ul style="list-style-type: none"> • Excavation, levelling, and compacting of the gravelling of the construction site, access road and construction yard; • Aggregate material handling/stockpiling at the construction site, access road and construction yard; • Wind action on exposed surfaces; • Vehicle transit on unpaved construction areas. • Land clearing activities, levelling, excavation, grading for the installation of towers' foundations and the needed access roads. 	<ul style="list-style-type: none"> • Watering unpaved surfaces to reduce wheel generated dust • Vehicle speed limited to 40 km/h, reduced to 15-20 km/h on the construction site, to minimize dust generated by the transit of vehicles • Covering/humidifying of materials that can be transported by wind (e.g. topsoil, aggregate) where possible; this measure allow to abate by 90% dust resuspension caused by winds on active stockpiles (WRAP Fugitive Dust Handbook). • All stockpile materials with high risk to produce airborne dust will be covered, in particular during windy periods. 	Throughout decommissioning phase <ul style="list-style-type: none"> • Implementation: Contractor • Control: STEG 	<ul style="list-style-type: none"> • Monitoring • Inspections by the Contractor of access roads and decommissioning sites for excessive nuisance due to dust. • Contractor shall maintain records of complaints on dust, and follow-up with corrective measures 	15,000 USD
Noise	Increase in atmospheric concentration of macro pollutants (primarily NOx and CO) induced by vehicles and machinery exhaust emissions	<ul style="list-style-type: none"> • Heavy equipment (e.g. bulldozers, graders, rollers,) and engine-driven machinery (e.g. drilling machines, pumps etc.) involved in the decommissioning activities; • Exhaust emissions from light and heavy-duty vehicles travelling to and from the construction sites (induced traffic emissions). 	<ul style="list-style-type: none"> • Use of best available technologies for equipment and machinery; • Regular maintenance and inspection of machinery performed in accordance with manufacturer instructions; • Vehicles and machinery will be turned off when not in use 	Throughout decommissioning phase <ul style="list-style-type: none"> • Implementation: Contractor • Control: STEG 	<ul style="list-style-type: none"> • Monitoring • Inspections by the Contractor of all equipment and machinery used during decommissioning. • Contractor shall maintain records of complaints on air quality, and follow-up with corrective measures 	Included in the decommissioning contract
Noise	Increase in background noise levels due to construction equipment and machinery	Use of heavy equipment and machinery during civil works	<ul style="list-style-type: none"> • Switch off equipment when not in use; • Limit noise activities to the least noise – sensitive time of the day; • Location of noise equipment as far as practicable from nearby receptors • Regular maintenance of equipment and machinery in order to ensure noise emissions in accordance with technical specifications 	Throughout decommissioning phase <ul style="list-style-type: none"> • Implementation: Contractor • Control: STEG 	<ul style="list-style-type: none"> • Inspections by the Contractor of construction areas for excessive noise nuisance. • Contractor shall maintain records of complaints on noise and follow-up with corrective measures • Noise level within standard fixed by local authority and by WBG standards 	Included in the decommissioning contract

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
<ul style="list-style-type: none"> Geology, geomorphology and soil 	<ul style="list-style-type: none"> Potential soil and subsoil contamination 	<ul style="list-style-type: none"> Leaks from the use of construction machinery and storage of fuel refueling activities Discharge of wastewater Inadequate management of solid waste Accidental spills of hazardous and non-hazardous material Excavation activities Inadequate management of excavated materials 	<ul style="list-style-type: none"> All major construction plant and equipment will comply with international noise emission limits Transportation activities and the delivery of construction materials during working hours Notify local community/public located within 500 m from the worksites before starting noise activities (residents must be informed at least 24 hours in advance) Vehicle movements shall be limited to a speed limit of 30 km/h Operational procedure to prevent and manage potential soil and subsoil contamination Excavated soil management procedures Providing emergency response kits Use the best available technologies for the equipment and machineries Periodic maintenance of the equipment Contaminated soil should be stripped and stored on suitable impermeable surfaces Waste management procedure (segregation of hazardous and non-hazardous waste; implement a construction equipment/material inventory management system; Ensure regular surveillance of any spillage on nearby proprieties: land filling must be restricted within the boundary of project's activities 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Maintenance log book of vehicle and machinery Inspections by the Contractor Hazardous materials management plans approved by STEG prior to initiation of Construction phase. Soil surface/volume contaminated (target=0) Rate of treated contaminated soil (target=100% of stripped and stored volume) 	<ul style="list-style-type: none"> 5000 USD
<ul style="list-style-type: none"> Potential soil disturbance and degradation 	<ul style="list-style-type: none"> Land clearing and vegetation removal in worksites and under the line corridor Machinery operations and movement of vehicles during the construction Excavation activities 	<ul style="list-style-type: none"> Excavated topsoil will be stored in a dedicated topsoil storage site When construction work is over, topsoil will be reinstated at the construction site. Excavations with appropriate slopes to keep the excavation face safe. Temporary construction yards will be restored Restoration of compacted soils by tilling. 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Soil surface affected (compacted, eroded) Topsoil stored and brought back to its original site Rate of treated compacted soil Excess spoil and soil covered with topsoil and revegetated Number of operations on eroded areas 	<ul style="list-style-type: none"> 20000 USD 	<ul style="list-style-type: none"> 30000 USD
<ul style="list-style-type: none"> Landtake 	<ul style="list-style-type: none"> Construction yards Construction of access roads Temporary worksites Land clearing and excavation activities 	<ul style="list-style-type: none"> Preliminary assessment of construction sites to be used by the Contractor Optimization/reducing of construction site number Adequate site restoration after construction activities are completed 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Number of used construction sites 	<ul style="list-style-type: none"> 30000 USD 	

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
<ul style="list-style-type: none"> • Freshwater Resources (Surface and Groundwater) 	<ul style="list-style-type: none"> • Potential groundwater contamination • Alteration of groundwater 	<ul style="list-style-type: none"> • Leaks from the use of construction machinery and storage of fuel • Refueling activities of • Discharge wastewater • Inadequate management of solid waste • Accidental spills of hazardous and non-hazardous material • Excavation activities • Inadequate management of excavated materials 	<p>Operational procedure to prevent and manage potential soil and subsoil contamination:</p> <ul style="list-style-type: none"> • Waste management procedures • Excavated soil management procedures • Providing emergency response kits • Use the best available technologies for the equipment and machineries • Periodic maintenance of the equipment • Contaminated soil should be stripped and stored on suitable impermeable surfaces • Ensure regular surveillance of any spillage on nearby proprieties • Preliminary assessment of construction sites to be used by the Contractor (minimum distance to keep from watercourses and reservoirs) 	<p>Development prior to, and implementation during, decommissioning phase</p> <ul style="list-style-type: none"> • Development: Contractor • Approval and control: STEG 	<ul style="list-style-type: none"> • Inspections by the Contractor • Hazardous materials management plans approved by STEG prior to initiation of Construction phase. • No pollution detected • All contaminated materials adequately stored • No complaints from stakeholders (local communities, NGOs and authorities) 	5000 USD
<ul style="list-style-type: none"> • Biodiversity Terrestrial section 	<ul style="list-style-type: none"> • Loss of natural vegetation and disturbance and loss of natural habitats (habitat fragmentation) • Disturbance and loss of fauna • Introduction of invasive species • Impact on ecosystem service (species with high value and providing services for local community or for carbon sequestration/regulation of water flow/erosion prevention and maintenance) 	<ul style="list-style-type: none"> • Corridor vegetation cutting and clearing for the removal of towers and OHL • Filling, levelling and grading of land • Earth movement • Use of engine driven vehicles and machinery (i.e. excavators, bulldozers, side booms, trucks, cars) • Construction yards • Construction of access roads 	<p>Development prior to, and implementation during, decommissioning phase</p> <ul style="list-style-type: none"> • Development: Contractor • Approval and control: STEG 	<ul style="list-style-type: none"> • Area of vegetation lost/disturbed • Number of complaints from stakeholders (local authorities, AAO, ATVS) 	5000 USD	

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Landscape	<ul style="list-style-type: none"> Visual disturbance and physical changes of the landscape features due to the construction sites and activities 	<ul style="list-style-type: none"> Land clearance and removal of existing vegetation Earthmoving, levelling, excavation and back-filling activities Vehicle transit and transportation activities Temporary presence of active work sites with storage of materials and equipment 	<ul style="list-style-type: none"> Rehabilitate disturbed areas around construction sites in order to restrict extended periods of exposed soil Restore temporary work sites immediately after construction. Maintain construction sites in orderly condition and do not distribute material over many sites before usage 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Inspections by the Contractor All affected areas are restored after construction activities No complaints from stakeholders (local communities, NGOs and authorities) 	15000 USD
Land use	<ul style="list-style-type: none"> Economic displacement for farmers using lands within the RoW of the OHL Restricting of farming within the RoW Reduction of areas available for agricultural activities 	<ul style="list-style-type: none"> Corridor vegetation cutting and clearing Earth movements Construction yards of access roads 	<ul style="list-style-type: none"> Clearance and vegetation removal activities to be restricted to the minimum area Strictly follow procedures of the Resettlement Framework Policy (RFP) and the Resettlement Action Plan (RAP), to be conducted later before the construction phase) The Promoter would ensure full compensation is paid to affected persons in compliance with the procedures of the RFP and RAP studies Conduct consultations with stakeholders (landowners and land users) to inform them about the construction activities and expected impacts and the grievance mechanism, fixed by the RAP/RFP, to raise their complaints. 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> All potential affected persons (PAPs) are fully compensated Absence of non-compliance reports Number of complaints received from stakeholders (authorities and civil society) Number of public grievances 	Included in the decommissioning contract
Community Health safety	Risk of accidents and physical injuries involving residents	Construction activities	<ul style="list-style-type: none"> Require all Contractors and Subcontractors to comply with relevant STEG's health and safety requirements. Prepare and implement a Community Health and Safety Plan Fencing and guarding of areas intended for company use (base camp, extraction areas, work sites, etc.) Fluorescent strips to delimit other areas of the construction site prohibited to the public Installation of panels indicating and informing local population about the progress of the work 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Community Health and Safety Plan approved by STEG before starting of works Training records Records of accidents Records of complaints 	Included in the decommissioning contract
	Increased stress-related disturbances (noise, dust, and air pollution).	<ul style="list-style-type: none"> Construction activities Transportation and traffic 	<ul style="list-style-type: none"> Prepare and implement a Community Health and Safety Plan 	<ul style="list-style-type: none"> Development prior to, and implementation during, decommissioning phase Development: Contractor 	<ul style="list-style-type: none"> Community Health and Safety Plan approved by STEG before starting of works Training records 	Included in the decommissioning contract

Environmental and/or Social Components	Potential Impacts	Sources of Impact	Management Measure	Implementation Timing / Responsibilities	Performance Indicators	Costs
Occupational Health and Safety (OHS)	Working at the decommissioning site will present some generic health and safety risks to workers, as it increases the risk of injury or death from accidents	Construction activities	<ul style="list-style-type: none"> Notify landowners along the line route about the construction schedule and activities. Prepare an occupational health and safety plan and adopt and implement its recommendations. Prepare an emergency preparedness and response plan that considers a range of organizational, operational and preventive measures in the event of an emergency. Require all Contractors and Subcontractors to comply with relevant STEG's health and safety requirements. Training specific to construction site Nursing facilities in each camp Distribution of personal protective equipment (PPE) to all workers Organization of training sessions in Health-Safety-Environment for the personnel operating on the site Organization of regular information and awareness campaigns for workers and residents against STIs/AIDS, waterborne diseases and COVID-19 Agreement with a clinic or a private doctor to carry out regular visits to the camps, monitor the health of the workers, monitor compliance with hygiene conditions 	<ul style="list-style-type: none"> Approval and control: STEG Development prior to, and implementation during, decommissioning phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Records of work accidents Training records Records of work accidents 	Included in the decommissioning contract
Labor Working Conditions	Degradation of workers' living conditions	<ul style="list-style-type: none"> Worksites during and after works 	<ul style="list-style-type: none"> Equipment of the camps with sanitary facilities, septic tank, bins, dumpsters, etc. Installation in the camps of a rest area and a canteen equipped to be able to heat up food Require all Contractors and Subcontractors to comply with relevant STEG's health and safety requirements. 	Development prior to, and implementation during, decommissioning phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Number of complaints 	Included in project cost
Infrastructure	Increased traffic and disturbance of traffic flow	<ul style="list-style-type: none"> Construction activities Transportation and traffic 	<ul style="list-style-type: none"> Prepare and implement a Transport and traffic management plan Notify landowners along the line route about the construction schedule and activities. 	Development prior to, and implementation during, decommissioning phase <ul style="list-style-type: none"> Development: Contractor Approval and control: STEG 	<ul style="list-style-type: none"> Transport and traffic management plan approved by STEG before starting of works 	Included in the decommissioning contract

					
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3. ESMP MANAGEMENT

The ESMP is a live document and should be amended during project construction and operation to reflect any changes which occur to the design and performance or the relevant environmental and social conditions. The Contractor and Sub-contractors during the construction phase and the Proponent during the operational phase shall comply with the ESMP requirements as applicable to the tasks they are employed to undertake. Due to differences in legislation and different policies of the two national companies, Terna and Steg, that compose ELMED ETUDES, separate plans have been developed for the Tunisian section and for the Italian section of the project.

The present document refers to the Tunisian components, that will be contracted by STEG as Project Proponent.

3.1 Project development

The following ESF-compliant action plans have been developed for the project:

- SEP: Stakeholder Engagement Plan.
- BAP: Biodiversity action plan
- SEA/SH: Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan
- LMP: Labor Management Procedure
- ESCP: Environmental and Social Commitment Plan

3.2 Pre-construction and construction phase

The Construction Contractor will prepare the following mitigation and management plans, to be approved by STEG:

Environmental management plans

- Dust management plan
- Noise management plan
- Silt management plan
- Soil management plan
- Waste management plan
- Storage management plan
- Transport and traffic management plan
- Water management plan

Social management plans

- Community Health and Safety Plan
- Labor Influx Plan
- Stakeholder Engagement Plan
- Community grievance plan
- Traffic and Transport Plan
- Labor grievance mechanism
- Occupational health and safety plan
- Construction workers' accommodation plan
- Cultural heritage chance finds procedure
- Human Resource Plan and Local Employment Policy
- Supply Chain Management Plan (including relevant Code of Conduct for Project Workers)

					
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Emergency action plans

- Spill prevention plan
- Ground contamination action plan
- Emergency preparedness and response plan

3.3 Operation phase

For the operation phase of the project STEG will prepare the following mitigation and management plans:

Environmental management plans

- Waste management plan
- Hazardous materials management plan
- Water management plan

Social management plans

- Labor management plan
- Labor grievance mechanism
- Occupational health and safety plan
- Stakeholder Engagement Plan
- Community Health and Safety Plan

Emergency action plans

- Spill prevention plan
- Emergency preparedness and response plan

3.4 Decommissioning phase

Activities in the decommissioning phase will be akin to those related to the construction phase: consequently, the plans to prepare and their responsibilities will be the same.

					
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4. MONITORING

4.1 Introduction

Monitoring is a key tool in analyzing the environmental and social impacts of the project and a tool for providing information to STEG on adaptive management responses that may be needed to avoid, improve, or reduce these impacts.

Monitoring aims to examine changes induced by the project to environmental and social components. It is aimed at determining whether these variations are attributable to the project and then to seek any corrective actions that can reduce the impacts to acceptable levels.

Three monitoring phases are established, corresponding to project development phases:

- Pre-construction Phase (PCP);
- Construction Phase (CP);
- Operational Phase (OP).

Pre-construction Phase: this phase aims to provide the environmental and social baseline, before any change related to works. This phase must end before the beginning of construction works.

Monitoring during construction phase: it covers the construction period of the project, from the opening of construction sites up to their complete dismantling and site restoration. This is the phase with the greatest variability as it is closely linked to the progress of works. The aim of monitoring during construction is:

- to evaluate changes to environmental and social baseline conditions;
- to assess the efficiency of mitigation actions;
- to report the occurrence of any critical issue so to act promptly.

Operational Phase Monitoring: this stage is divided into pre-operation and operation phase of the works and should not start before the complete dismantling and restoration of sites. Monitoring can last for some years after the completion of the works, its duration depending on the specific environmental component being monitored. The aims of OP Monitoring are:

- to evaluate changes to environmental and social baseline conditions;
- to assess the efficiency of mitigation actions;
- to verify the overall environmental impacts caused by the project and indicate any need for further measures to contain the unforeseen effects;
- to provide information on environmental and social performance to permitting authorities as needed.

The choice of the environmental components to be monitored, as significant to characterize the quality of the environment, considers both the sensitivity and vulnerability of the environmental context, and the impact estimations and mitigation interventions envisaged by the ESIA.

In particular the location of the monitoring points was defined based on:

- the sensitivity of the territory (presence of sensitive receptors, areas of naturalistic value, ecc.);
- the magnitude of the expected impact, as illustrated in the ESIA.

The data provided by the monitoring should enable direct comparison with national and international benchmarks and other international requirements; as well as standards and guidelines identified in the ESIA.

4.2 Monitoring organization

STEG will be responsible for the implementation of all activities described in the present monitoring plan.

In particular:

- STEG will appoint a qualified Contractor to carry out activities for both terrestrial and marine environment monitoring;

					
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- At the same time, STEG will promptly analyzes, through its organization or qualified consultants, all monitoring data, in order to spot any significant changes induced by the project to the environment, and to compare them with the ESIA's predictions.

4.3 Monitoring programme

The following tables illustrate the monitoring program conceived for the TUNITA project. For each environmental and social component, the following information are given:

- Monitoring methods;
- Monitoring objectives;
- Location of monitoring points/areas;
- Monitoring frequency in the three project phases.

Monitoring activities regard all areas involved by the project, both terrestrial and marine. Areas involved by associated facilities both marine and terrestrial (Italian side) will not subject to monitoring, apart that related to Italian regulations.

Monitoring reports shall be provided by the monitoring contractor at the end of each monitoring campaign. A yearly monitoring report, with critical analysis of all data, shall be provided each year; the report will include graphs and comments of the evolution of environmental components, together with a description of works and activities carried out during the reference period.

4.4 Terrestrial domain - Tunisian side

Environmental/social Component	Monitoring Method	Standards/Targets	Location	Frequency	Cost
Air quality	<p>Exhaust emission monitoring</p> <ul style="list-style-type: none"> visual inspection of construction sites and all access roads Inspection of complaints <p>Ambient air quality</p> <ul style="list-style-type: none"> Visual inspection Air quality monitoring Inspection of complaints Inspection of maintenance records of vehicles and equipment Visual inspection of construction sites and access roads (tower location, CS, HDD and HVDC locations) Visual inspection of vehicles/machines and maintenance and refueling areas Inspection of spill reports and storage areas Inspection of maintenance records Check the condition of disturbed sites after restoration actions Sampling and laboratory analysis (pH, Temperature, turbidity, etc.) Visual inspection to detect any pollution sign (oil, waste, etc.) Visual inspection to verify the presence of sanitation facilities (number and condition) 	<p>Avoid significant degradation of baseline conditions</p> <p>Avoid significant degradation of baseline conditions (national standard: NT 106.04)</p> <p>Minimize erosion at construction sites and at access roads</p> <p>Avoid soil contamination</p> <p>Reforestation</p> <p>Avoid water contamination and any degradation of baseline conditions (National standard NT 106.02)</p> <p>Avoid river's obstruction</p> <p>Avoid significant degradation of baseline conditions International (WBG) and local (Municipality of Tunis) standards Noise level below 55 dB daytime (WBG)</p> <p>Avoid significant degradation of baseline conditions</p>	<ul style="list-style-type: none"> All construction vehicle and equipment Construction sites (HDD, HVDC, CS, OHL and other sites to be used by the Contractor) Unpaved roads used by the Contractor Construction sites (HDD, HVDC, CS, OHL and other sites to be used by the Contractor) Sensitive areas (riverbanks, forest area, agricultural lands, etc.) Construction sites (HDD, HVDC, CS, OHL) Along the RoW and access roads of the OHL Landfall site of Kélibia Miaâbi CS Other construction sites near sensitive receptors (residential areas) 	<ul style="list-style-type: none"> Regularly during CP phase PCP/CP: two times per year (summer and winter season) PCP/CP: 1000 USD per campaign, total 40 x 1000 = <u>20,000 USD</u> PCP/CP: observation CP: after relevant construction PCP/CP: two times per year (summer and winter season) PCP: 1 noise monitoring campaign per site (baseline characterization) CP: 1 noise monitoring campaign per site per year CP: within 24 hours of request or noise complaint by worker or external party (local community) OP: 1 noise monitoring campaign for CS area Before beginning of operation phase OP: one annual periodic measurement during operation 	<p>CP: 500 USD per month, total 40 x 500 = <u>20,000 USD</u></p> <p>PCP+CP: 1000 USD per campaign, total 10 x 1000 = <u>10,000 USD</u></p> <p>PCP+CP: 1000 USD per month, total 45 x 1000 = <u>45,000 USD</u></p> <p>PCP+CP: 250 USD per campaign, total 10 x 250 = <u>2,500 USD</u></p> <p>PCP: 1000 USD per campaign, total 4 x 1000 = <u>4,000 USD</u></p> <p>CP: 1000 USD per campaign, total 20 x 1000 = <u>20,000 USD</u></p> <p>OP: 1000 USD per campaign, total 1 x 1000 = <u>1,000 USD</u></p> <p>PCP: 1000 USD per campaign, total 5 x 1000 = <u>5,000 USD</u></p>
Soil integrity					
Water quality					
Noise	<ul style="list-style-type: none"> Noise measurements (baseline) Noise monitoring campaign include both short term measurements (e.g. 1h for two sensitive receptors) + long term measurements (e.g. 24h for one sensitive receptor) Visual inspection of maintenance records and complaints (local residents, visitors and workers) Instrumental measurements in case of complaints 				
Electromagnetic fields	<ul style="list-style-type: none"> Measurement of electric field and magnetic field Inspection of complaints from workers or local residents 				

Environmental/social Component	Monitoring Method	Standards/Targets	Location	Frequency	Cost
Landscape	<ul style="list-style-type: none"> Visual inspection (no project vs with project) Photographic documentation Interviews with stakeholders and affected persons and inspection of their complaints Check the condition of the project area after restoration actions 	International standards ICNIRP (guidelines 1998) and IEC 61786(1998) Avoid significant degradation of baseline conditions	<ul style="list-style-type: none"> Construction sites (HDD, HVDC, CS, OHL) Along access roads and RoW the OHL line 	phase (at least for the first two years of OP) <ul style="list-style-type: none"> PCP: 1 campaign CP: 2 campaigns per year OP: after land restoration 	OP: 1000 USD per campaign, total 5 x 1000 = <u>5.000 USD</u> PCP: 4000 USD per campaign, total 1 x 4000 = <u>4.000 USD</u> CP: 4000 USD per campaign, total 7 x 4000 = <u>32.000 USD</u> OP: 4000 USD per campaign, total 1 x 4000 = <u>4.000 USD</u>
Flora Loss of forested areas	<ul style="list-style-type: none"> Forest inventory and field observations with the support of local authority in charge of forest (DGF department of Forest) Visual inspection of planning documents and observation of final design of the project (OHL line) Inspection of vegetation removal operations Inspection if DGF (Forestry department) was involved during vegetation cutting operations Compensatory tree re-planting actions Inspection of complaints from stakeholders (local community, local NGO, etc.) Visual inspection 	Avoid significant degradation outside the RoW, in particular for the OHL line Avoid and reduce project footprint into terrestrial and costal natural areas Reduced areas of lost natural/forested areas	<ul style="list-style-type: none"> Along RoW of the OHL line, in particular where forested habitats are found (Beni Ayech, Khanguet El Hojjei, Jebel Ressas and Sidi Fre) Disturbed construction sites 	<ul style="list-style-type: none"> PCP: 1 campaign CP: 1 campaign per year During land clearance and vegetation removal within the RoW After relevant construction 	PCP: 3000 USD per campaign, total 1 x 4000 = <u>3.000 USD</u> CP: 600 USD per month, total 24 x 600 = <u>14.400 USD</u>
Flora Extraction of trees	<ul style="list-style-type: none"> Field survey and observation of rehabilitated areas Visual inspection 	Vegetation recovery on rehabilitated areas (density and diversity)	<ul style="list-style-type: none"> Along RoW of the OHL line, in particular where forested habitats are found (Beni Ayech, Khanguet El Hojjei, Jebel Ressas and Sidi Fre) Disturbed construction sites Replanting sites 	<ul style="list-style-type: none"> PCP: 1 campaign During land clearance and vegetation removal within the RoW After relevant construction (CP) 	CP: 1000 USD per campaign, total 1 x 1000 = <u>1000 USD</u> OP: 1000 USD per campaign, total 3 x 1000 = <u>3000 USD</u>
Flora Vegetation success of rehabilitated areas	<ul style="list-style-type: none"> Field survey and observation: when the final design of the OHL line is known (final location of towers), an avifaunal inspection could be 	Compliance with BAP guidelines Avoid habitat loss	<ul style="list-style-type: none"> Along RoW of the OHL line and near the CS of Mlaabi Forested areas 	<ul style="list-style-type: none"> PCP/CP: 4 times in a year OP: 4 times in a year for the first 3 years of operation (mortality, evaluation of 	PCP: 5000 USD per campaign, total 4 x 5000 = <u>20000 USD</u>

Environmental/social Component	Monitoring Method	Standards/Targets	Location	Frequency	Cost
<p>Fauna Bat conservation</p>	<p>performed along the final line route and its access roads to identify sensitive bird receptors (breeding areas, nesting sites, interaction with the migration corridor)</p> <ul style="list-style-type: none"> Verify the list of species affected by the project and the proposed measures Inspection of suggestion/complaints from stakeholders, in particular DGF and AAO (Friends of Birds Association, a Tunisian NGO) monitoring of applied mitigation measures: identification of high-risk areas (burying these areas if possible), installation of bird flight diverters, anti-electrocution insulation devices on pylons) 	<p>Avoid nest destruction and disturbance of breeding areas (especially for threatened species or those placed in the Red List of IUCN)</p> <p>Avoid/reduce any direct or indirect impacts on water storages around the overhead line</p> <p>No mortality (by collision/electrocution)</p>	<ul style="list-style-type: none"> Sites at valleys and mountain meadows 	<p>mitigation effectiveness)</p> <p>measures</p>	<p>CP: 2000 USD per campaign, total 7 x 2000 = <u>14000 USD</u></p> <p>OP: 2500 USD per campaign, total 12 x 2500 = <u>30000 USD</u></p>
<p>Fauna Bat conservation</p>	<ul style="list-style-type: none"> Field survey to verify the absence of critical species 	<p>Compliance with BAP guidelines</p> <p>Avoid habitat loss and disturbance</p> <p>No mortality</p>	<ul style="list-style-type: none"> Along RoW of the OHL line and near the CS of Mlaâbi Forested areas Sites at valleys and mountain meadows 	<p>PCP/CP: 4 times in a year OP: 4 times in a year for the first 3 years of operation (mortality, evaluation of mitigation effectiveness)</p>	<p>PCP: 5000 USD per campaign, total 4 x 5000 = <u>20000 USD</u></p> <p>CP: 2000 USD per campaign, total 7 x 2000 = <u>14000 USD</u></p> <p>OP: 2000 USD per campaign, total 12 x 2000 = <u>24000 USD</u></p>

4.5 Marine domain

Environmental/social Component	Monitoring Method	Standards/Targets	Location	Frequency	Cost
Posidonia oceanica and Cymodocea nodosa	Visual survey (Scuba-diving; ROVs) using permanent transects or quadrats	<ul style="list-style-type: none"> • Minimum impact on beds • Recolonization of cable laying trench • Stable upper and lower limits of the Posidonia oceanica meadows • Stable meadow cover and shoot density • No invasion by <i>Caulerpa taxifolia</i>, <i>Caulerpa racemosa</i> or other alien species. • Distribution map • Density 	Cable corridor from the HDD exit point to 40m depth (nearshore)	<ul style="list-style-type: none"> • PCP: 1 survey (Baseline) • CP: 1 survey at the end of cable-laying works • OP: 2 surveys/year (spring and autumn) for the following 3 years 	PCP: <u>USD 20,000</u> CP: <u>USD 20,000</u> OP: USD 20,000 per survey x 2 surveys per year x 3 years = <u>USD 120,000</u>
Caulerpa sp.	Visual survey (Scuba-diving; ROVs) using permanent transects or quadrats	<ul style="list-style-type: none"> • No change in average number of species recorded from baseline 	Cable corridor from the HDD exit point to 40m depth (nearshore, Tunisia)	<ul style="list-style-type: none"> • PCP: 1 survey (Baseline) • CP: 1 survey at the end of cable-laying works • OP: 2 surveys/year (spring and autumn) for the following 3 years • PCP: 12 surveys over one year (1/month; Baseline); • Seasonally (4 times/year, Baseline), fishery catch/effort data per taxonomic group/species • CP: Continuous surveying through ROV; • 1 additional survey at the end of cable-laying works (before Operation Phase); • OP: 1 survey/year for the following 3 years 	PCP: <u>USD 10,000</u> per survey x 12 = <u>USD 120,000</u> CP: <u>USD 120,000</u> OP: USD 10,000 per survey x 3 = <u>USD 30,000</u>
Actinopterygii and Chondrichthyes	<ul style="list-style-type: none"> • Visual survey (Scuba-diving; ROVs) • Fishery landing data 	No change in average density of species recorded from baseline	Cable corridor between Tunisia and Italy landing points	<ul style="list-style-type: none"> • PCP: 1 survey in winter (Baseline); • CP: Continuous surveying (ship-based, daily during cable laying works) • OP: 1 survey/year (winter) for the following 3 years 	PCP: <u>USD 20,000</u> (to account for vessel rental) CP: Cost of avifauna expert to be included during the construction works onboard the ship: USD 2000 per month x 4,5 months = <u>USD 9000</u> OP: USD 20,000 x 3 = <u>USD 60,000</u> PCP: <u>USD 10,000</u> per survey x 4 = <u>USD 40,000</u> CP: <u>USD 20,000</u> OP: <u>USD 40,000</u> (first year) OP: USD 10,000 per survey x 2 surveys per year x 2 years = <u>USD 40,000</u>
Aves	Ship-based/aerial based surveys using fixed line transect counts	No change in average density of species recorded from baseline	Cable corridor between Tunisia and Italy landing points	<ul style="list-style-type: none"> • PCP: Seasonally (4 times/year; Baseline) • CP: 1 survey at the end of cable-laying works (before Operation Phase) • OP: Seasonally (4 times/year) for the first year • Bi-annually for the next 2 years 	PCP: <u>USD 10,000</u> per survey x 4 = <u>USD 40,000</u> CP: <u>USD 20,000</u> OP: <u>USD 40,000</u> (first year) OP: USD 10,000 per survey x 2 surveys per year x 2 years = <u>USD 40,000</u>
Bivalvia and Anthozoa	Visual survey (Scuba-diving; ROVs) using permanent transects or quadrats	<ul style="list-style-type: none"> • Minimum loss in density for individuals in both taxonomic groups • Recolonization of cable laying trench 	Cable corridor from the HDD exit point to 40m depth (nearshore)	<ul style="list-style-type: none"> • PCP: Seasonally (4 times/year; Baseline) • CP: 1 survey at the end of cable-laying works (before Operation Phase) • OP: Seasonally (4 times/year) for the first year • Bi-annually for the next 2 years 	PCP: <u>USD 10,000</u> per survey x 4 = <u>USD 40,000</u> CP: <u>USD 20,000</u> OP: <u>USD 40,000</u> (first year) OP: USD 10,000 per survey x 2 surveys per year x 2 years = <u>USD 40,000</u>

Environmental/social Component	Monitoring Method	Standards/Targets	Location	Frequency	Cost
Reptilia - Marine turtles	Ship-based surveys using fixed line transect counts	No change in average density of turtles recorded from baseline	Cable corridor between Tunisia and Italy landing points	<ul style="list-style-type: none"> PCP: Seasonally (4 times/year; Baseline) CP: Continuous surveying (ship-based, daily during cable burying works) OP: Seasonally (4 times/year) for the next 3 years 	PCP: USD 20,000 x 4 = <u>USD 80,000</u> CP: Cost of reptiles expert to be included during the construction works onboard the ship: USD 2000 per month x 4,5 months = <u>USD 9000</u> CP: Cost of MMO to be included during the construction works onboard the ship: USD 2000 per month x 4,5 months = <u>USD 9000</u> OP: USD 20,000 x 4 surveys per year x 3 years = <u>USD 240,000</u> PCP: <u>USD 5,000</u> CP: <u>USD 5,000</u> OP: USD 5000 x 3 = <u>USD 15,000</u>
Mammalia - Cetaceans	Ship-based/aerial based surveys using fixed line transect counts	No change in average density of turtles recorded from baseline	Cable corridor between Tunisia and Italy landing points	<ul style="list-style-type: none"> PCP: 2 surveys (Bi-annually; Baseline) CP: Continuous surveying (ship-based, daily during cable burial works) OP: 2 surveys (Bi-annually) for the next 3 years 	PCP: 1 campaign CP: 1 campaign at the end of cable-laying works OP: 3 yearly campaigns
Sediments	Sampling with Van Veen grab sampler Chemical analysis on samples: total N and P, Metals (Hg, Cd, Pb, As, Cr total, Cr VI, Cu, Ni, Zn, Fe, Mn, total Hydrocarbons, PAH.	Avoid soil contamination	Along the electrode and power cable routes on both Italian and Tunisian sides: <ul style="list-style-type: none"> one point in correspondence to HDD exit point; two points along the cable section within 40 m depth. 	<ul style="list-style-type: none"> OP: 5 yearly campaigns 	OP: USD 10000 x campaign: total = <u>USD 50000</u>
Sediments – EMF and thermal radiation	Deploying EMF and thermal radiation sensors with memory capacity at regular intervals (retrieval, download, redeployment)	EMF and thermal radiation are at negligible levels	On top of the marine cable on both Italian and Tunisian sides up to 40m depth	<ul style="list-style-type: none"> PCP: Monthly for 12 months (Baseline) CP: Continuous (during sediment disturbance activities) OP: Monthly for year 1; seasonally (4 times/year) for the next 2 years 	PCP: USD 500 per measurement campaign x 12 = <u>USD 6000</u> CP: <u>USD 10,000</u> OP: USD 500 per month x 12 = <u>USD 6,000</u> (Year 1)
Water column - physio-chemical parameters	In situ monitoring by multiparametric CTD probe	As per most recent national standards/targets (different for Italy and Tunisia)	Cable corridor from the HDD exit point to 40m depth (nearshore)	<ul style="list-style-type: none"> PCP: Monthly for 12 months (Baseline) CP: Continuous (during sediment disturbance activities) OP: Monthly for year 1; seasonally (4 times/year) for the next 2 years 	OP: USD 500 per month x 4 x 2 = <u>USD 4,000</u> (Years 2 and 3)
Water column - chlorophyll, nutrient	"Rosette" device equipped with Niskin bottles, sampling at different depths for analysis at the laboratory	As per most recent national standards/targets (different for Italy and Tunisia)	Cable corridor from the HDD exit point to 40m depth (nearshore)	<ul style="list-style-type: none"> PCP: Monthly for 12 months (Baseline) CP: Continuous (during sediment disturbance activities) OP: Monthly for year 1; seasonally (4 times/year) for the next 2 years 	

					
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5. MANAGEMENT

5.1 Company Organization and Role Responsibilities

5.1.1 Employer (STEG)

As the proponent of the Project, the employer will assume overall responsibility for implementing conditions dictated by the ESMP during construction and operation, and provide appropriate staff, financial resources, equipment and support systems to implement the ESMP effectively. STEG will ensure that its staff has the right skillset and dedication, as well as those contractors, and suppliers understand their obligation to comply with the requirements set out in the ESMP through various means, including mandatory staff inductions and contract conditions that are consistent with the commitments of the ESMP.

STEG is responsible for ensuring a suitably competent and experienced team will implement ESMP responsibilities for the Project, either if the positions are filled within existing STEG staff or specifically for the Project. Senior positions will have their environmental and social responsibilities and accountabilities clearly outlined. These descriptions will form part of the contractual obligations for each senior position, with specific accountabilities and responsibilities communicated through the Project Manager.

In particular the delivery of compensation for any land acquisition is under the full responsibility of the employer.

To allow for the Project preparation and implementation processes to be carried out effectively, it is proposed that an Environmental and Social Project Implementation Unit (ESPIU) be created, which will report directly to the Project Manager.

Project Manager

The Project Manager will have overall responsibility for occupational health and safety, environmental management and social performance, including the management of community relations and resettlement aspects of the Project and for ensuring the effective implementation of the policies, programs and procedures of STEG. The dedicated, on-site ESPIU will support the Project Manager to manage and monitor safety, health, and environmental issues associated with Project activities. In addition, is required to inform the Bank of any serious injuries or fatalities within 48 hours of its occurrence.

Environmental and Social Project Implementation Unit (ESPIU)

The ESPIU should be set-up at least one year before the beginning of construction works, and will follow ESMP procedures during the construction and operation phases of the project. At minimum, it will comprise a team of professionals hired on long-term basis (at least 2-year contracts) who will have the following responsibilities:

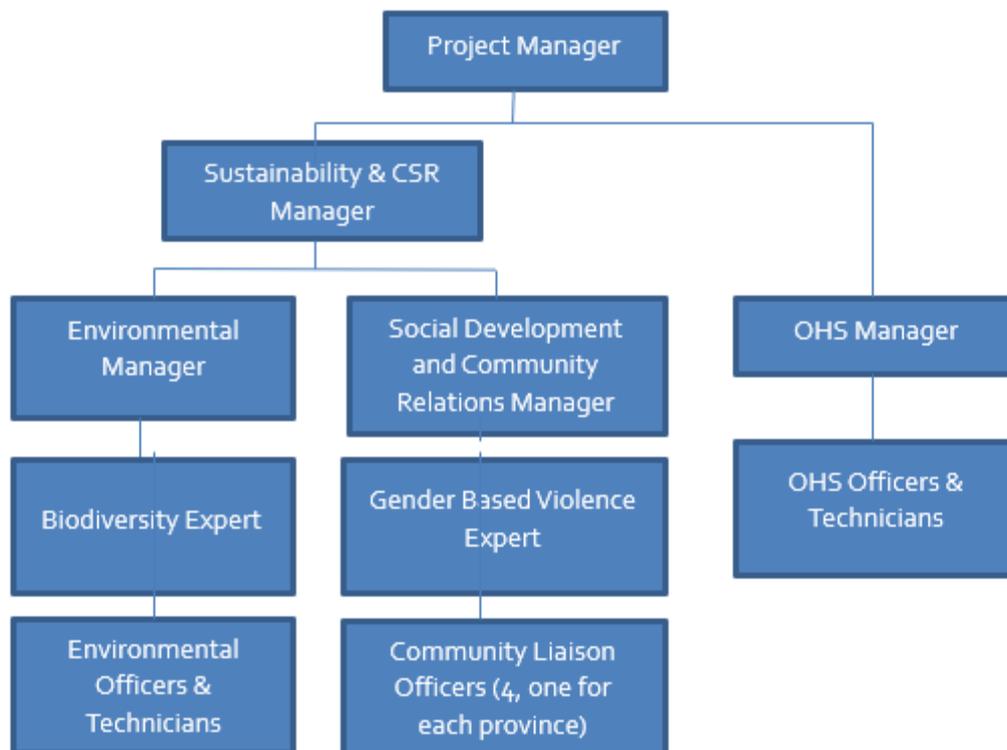
- Establish and maintain appropriate management systems and monitoring programs described in the ESMP are implemented to comply with legal obligations, ESIA commitments, and environmental and social international standard requirements such as the World Bank's ESS;
- Review environmental and social data and submit reports regarding progress of implementation, effectiveness of environmental and social management measures and monitoring data, and relevant environmental information and data required by regulators, including reporting to the appropriate regulatory authorities on significant reportable incidences as per regulations;
- Monitor the environmental and social compliance and performance of Project activities (including of contractors, vendors and suppliers) with the requirements of this ESMP and supporting management plans and procedures. Recommend appropriate actions or modifications as required for non-conformances within and continual improvement of the management system;
- Train STEG personnel and contractors as appropriate on Project environmental and social issues, and provide relevant environmental and social induction;

- Design and implement restoration / rehabilitation of disturbed areas and oversee RAP implementation.
- Establish, train and ensure readiness of the emergency response teams;
- Provide technical environmental and social support to construction and operations as necessary; and
- Proactively consult and engage with relevant government authorities, communities and other stakeholders - including dissemination of Project updates and regular, meaningful, inclusive and participatory consultations with affected communities.
- Establish and maintain a stakeholder database.

The department managers (Environmental, Social and OHS managers) will report directly to the head of the ESPIU, the Sustainability and CSR Manager on site, who will be part of the Project’s management team. The ESPIU is responsible for the day-to-day implementation and continuous improvement of the environmental components of the ESMP including rehabilitation activities, compliance monitoring and reporting.

The organizational structure of STEG’s ESPIU (long-term assignment staff) is presented in Figure 3 1.

- Environmental Manager: direct point of contact for project environmental issues;
- Social Performance Manager: direct point of contact for social aspects;
- Biodiversity Specialist: direct point of contact for all marine and terrestrial biodiversity issues, including coordination and analysis of the related monitoring activities;
- Gender Based Violence Expert: ensures issues related to sexual harassment and gender-based violence between workers and with communities are effectively dealt with respect to the applicable laws and rules
- OHS Manager: direct point of contact for project Health and Safety issues and for Labour Grievance Mechanism;
- Community Liaison Officers (at least one for each of the four governorates) : direct point of contact for community/ stakeholder issues.



ESPIU External Specialists

					
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When required, STEG will appoint external Environmental, Social and OHS specialists (e.g. human rights specialist) to assist with the implementation of the commitments made in this ESMP and associated policies, procedures and management plans for the Project. Independent audits of the Project will be conducted regularly (e.g. every year during operations – or more frequently if deemed necessary) to assess compliance and conformance with safety, health, environmental and social requirements, procedures, and management plans.

ESPIU Contractors, Suppliers and Vendors

Contractors, suppliers, and vendors to the Project will be contractually required to comply with the various commitments of STEG policies, procedures, and management plans (including this document).

In the event of non-conformance (e.g. identified during an environment, community relations and / or OHS department inspection or audit), the contractor, supplier, or vendor will be required to take corrective action according to the requirements of the relevant department. Resolution of non-conformance will be conducted according to the terms of the contract.

5.1.2 Construction contractor

The Construction Contractor will be responsible for complying with all relevant national and international legislation and adhere to all mitigation measures specified in this ESMP.

Prior to the commencement of construction works the Construction Contractor will be required to develop the individual plans within the ESMP and ensure their implementation.

The Construction Contractor will prepare and develop an Implementation Plan for the ESMP, including implementation schedule.

During construction, the Construction Contractor will assume overall responsibility for implementation and monitoring of the ESMP. In addition, to comply with the World Bank's ESF, the implementer will be responsible for complying with the Project's ESCP.

The Construction Contractor's organization must have sufficient, adequate and competent resources available to fulfil the environmental and social requirements established in this ESMP and supporting documentation.

The Construction Contractor is responsible for the ongoing management of potential environmental and social impacts of all contract activities, regardless of whether these are undertaken by the Construction Contractor itself or by Sub-contractors. All Sub-contractors must meet all requirements.

The Construction Contractor shall appoint, for the overall duration of the works, the following key figures:

- Environmental and Social Manager;
- Community Liaison Officer;
- Cultural Heritage Specialist / Archaeologist.

Environmental and Social Manager

The Construction Contractor's Environmental Manager will:

- take responsibility for mitigation and management of potential environmental and social issues on site;
- liaise with the Employer ESPIU team regarding site visits and briefing sessions;
- liaise with Sub-contractors regarding the ESMP requirements;
- organize and maintain briefing session records and mitigation and monitoring documentation;
- respond to site inspection findings;
- receive and respond to any complaints from external parties.

Community Liaison Officer

The Construction Contractor's Community Liaison Officer (CLO) will liaise with all relevant stakeholders and keep them informed about the project during the construction phase.

Cultural Heritage Specialist / Archaeologist

A qualified Cultural Heritage Specialist (CHS) should be retained by the Construction Contractor for the duration of the construction works to provide oversight of the Chance Finds Procedure and remain on-call on an as-needed-basis.

The responsibilities of the CHS include:

- Consultation with relevant key stakeholders (in Italy Archaeological Superintendency);
- Follow the procedures for the documentation and assessment of Chance Finds and determine if additional investigations are required;
- Follow the protocols for consultation with the national regulatory bodies to design and implement additional investigations (if required);
- Undertake record keeping and chain of custody for movable finds (in Italy according to procedures defined by the Archaeological Superintendency);
- Follow expert verification procedures;
- Produce Chance Find reports for issue to the Construction Contractor;
- Provide initial Chance Find training to the Contractor's and Sub-contractors' employees.

5.1.3 Subcontractors

All Sub-contractors must meet all requirements in relation to the Contractor's discharge of their responsibilities in terms of ongoing management of potential environmental and social impacts of all contract activities.

5.2 Capacity development and training

Effective environmental and social management is based on a collaborative approach involving shared responsibilities among stakeholders. In this context, the successful implementation of the ESMP is encouraged through an institutional support and capacity building program. An effective capacity building program should encompass the following points:

- completion of an organizational capacity assessment prior to construction;
- development and implementation of a stakeholder awareness program directed at relevant stakeholders;
- regarding execution of the ESMP, monitoring environmental and social performance, and understanding individual responsibilities;
- provide the institutions responsible for monitoring the ESMP with the tools, techniques, and support necessary;
- promote community involvement in project development, environmental and social performance, and continuous improvement.

During construction, the Construction Contractor will develop and implement an HSE Training Plan outlining training requirements, topics, and areas of capacity building, courses, and staff requiring training. The Contractor will also identify the knowledge and skills necessary for implementation of the ESMP and associated management plans.

The Construction Contractor will ensure that all workers have been inducted and will regularly monitor that occupational health and safety requirements are implemented. The Client's representative should audit that all requirements are met. Where occupational health and safety requirements are not being implemented relevant workers will immediately be trained and instructed to implement these requirements.

During operation it will be responsibility of STEG to develop and implement an HSE Training Plan for its employers, outlining training requirements, topics, and areas of capacity building, courses, and staff requiring training.

In both phases (construction and operation) all personnel involved in management and implementation of ESMP will be adequately trained. Training records will be maintained to provide evidence for auditing/inspection purposes.

Training should include:

- Why the environment needs to be protected and conserved;
- How construction/operation activities can impact on the environment;

- Impact mitigation measures;
- Awareness of the ESMP;
- Awareness of emergency and spills response provisions;
- Social responsibility during construction/operation, related in particular to local population.

5.2.1 Communities awareness and training

Experience gained from transmission line projects reveals that some inhabitants still construct various structures within the RoW and that accidents with locals may occur as a result. The risk of accidents could be reduced by offering training and informative material adapted to local communities. Communities could also play an active role for supervision and environmental and social monitoring, since they live near the OHL. Training, which targets local communities, will therefore reduce line related risks and allow for community level involvement in monitoring, including for example, monitoring of bird mortality, nesting, and carcass management.

5.3 Auditing of ESMP

STEG will designate adequate technical staff to review regularly the ESMP to assess its effectiveness and relevance as follows:

- A full review annually;
- Relevant sections of the ESMP will be reviewed following any reportable incident, or any significant non-compliance;
- Relevant sections of the ESMP will be reviewed following an addition, up-date or change order to the ESMP, or a sub-plan;
- Relevant sections of the ESMP will be reviewed at the valid request of stakeholders, PAPs or the local communities.

The review of the ESMP will include analysis of the data collection and analysis of data, monitoring reports, incident reports, non-compliances, corrective actions implemented, complaints/grievances and feedback from stakeholders, consultation meeting minutes and training records to evaluate the effectiveness of ESMP procedures.

To ensure that the ESMP is being implemented the following activities will be undertaken:

- During construction, the Construction Contractor's HSE Manager will carry out daily and weekly site walkovers to verify and ensure compliance to the ESMP;
- A brief audit report will be regularly compiled by the Construction Contractor's HSE Manager;
- During operation, site walkovers will be carried out on a monthly base by the maintenance team, and a monthly audit report will be prepared;
- External audits will be undertaken on a regular frequency during both construction and operation phases.

Audit reports will include incident/grievances forms, consulting with local communities and PAPs, and auditing performance of environmental and social management measures within the ESMP.

5.4 Non-conformance and Corrective Action Procedure

During construction and operation, the Construction Contractor and Employer, respectively, will implement a nonconformance and corrective action process to record issues reported by internal and external stakeholders.

The procedure for addressing non-conformance and corrective actions will include:

- A Non-Conformance Report (NCR) to record any environmental incident and work that has not been carried out in accordance with the ESMP and/or sub-plans;



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- A Corrective Action Report (CAR) where a deficiency is identified because of monitoring, inspection, surveillance and valid complaints.