

# Tunisia-Italy Power Interconnector Project

## Environmental and Social Impact Assessment (ESIA)

### Stakeholder Engagement Plan (SEP)

#### Tunisia

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## ABBREVIATIONS

Acronyms	Description
<b>ESF</b>	Environmental and Social Framework
<b>E&amp;S</b>	Environmental and Social
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESIA</b>	Environment and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESS</b>	Environmental and Social Standard
<b>GRM</b>	Grievance Redress Mechanism
<b>HSE</b>	Health, Safety and Environment
<b>IA</b>	Implementation Agency
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labour Organization
<b>KPI</b>	Key Performance Indicator
<b>LMP</b>	Labour Management Procedure
<b>LWC</b>	Labor and Working Conditions
<b>M&amp;E</b>	Monitoring and Evaluation
<b>NGO</b>	Non Governmental Organisation
<b>NEET</b>	Neither in Employment or Education Training
<b>OHS</b>	Occupational Health and Safety
<b>OIP</b>	Other Interested Parties
<b>PAP</b>	Project Affected People
<b>PMU</b>	Project Management Unit
<b>PS</b>	Performance Standard
<b>RAP</b>	Resettlement Action Plan
<b>RPF</b>	Resettlement Policy Framework
<b>SDB</b>	Stakeholder Data Base
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SEP</b>	Stakeholder Engagement Plan
<b>SGBV</b>	Sexual and Gender Based Violence
<b>SMPs</b>	Social Management Plans
<b>STEG</b>	Société Tunisienne de l'Electricité et du Gaz
<b>WB</b>	World Bank
<b>WGRM</b>	Worker Grievance Redress Mechanism

## 1. INTRODUCTION

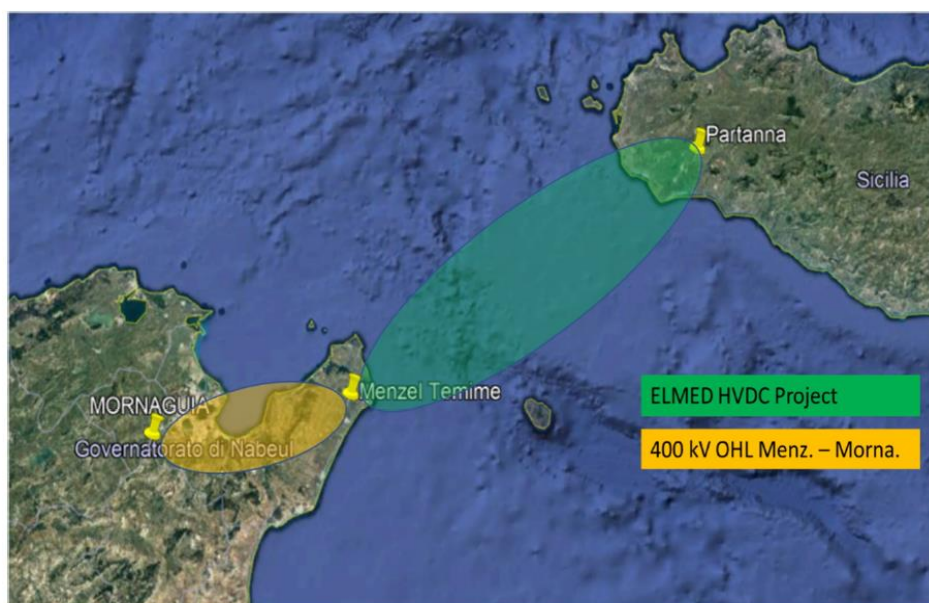
### 1.1 Project Background

The Tunisia-Italy Power Interconnector (“Elmed Interconnector”) is a bidirectional HVDC (High Voltage Direct Current) submarine electricity interconnection between Tunisia (Cap Bon) and Italy (Sicily), with a transmission capacity of 600 MW. The Project will connect Tunisia's power grid to the larger European network and aims to increase the interconnection capacity - and thus the security and sustainability of supply - of the Euro-Mediterranean system by creating a link between the European and Northern African energy systems.

The Project is being implemented by ELMED Etudes, a joint venture between the Italian Transmission System Operator (TSO), Terna (Rete Elettrica Nazionale S.p.a) and the Tunisian energy utility STEG (Société Tunisienne de l'Électricité et du Gaz), which is in charge of the Tunisian side. The World Bank will finance the converter station and Tunisian grid investments, with the submarine cable in Tunisian waters being financed by the European Investment Bank (EIB), Kreditanstalt für Wiederaufbau (KfW) and the European Bank for Reconstruction and Development (EBRD), in parallel financing. On the other hand, the submarine cable is considered by the World Bank as an associated facility. Therefore the Borrower (the Republic of Tunisia) needs to apply the World Bank's Environmental and Social Framework (ESF) for the submarine cable (and other environmental and social (E&S) standards of parallel funders, as appropriate).

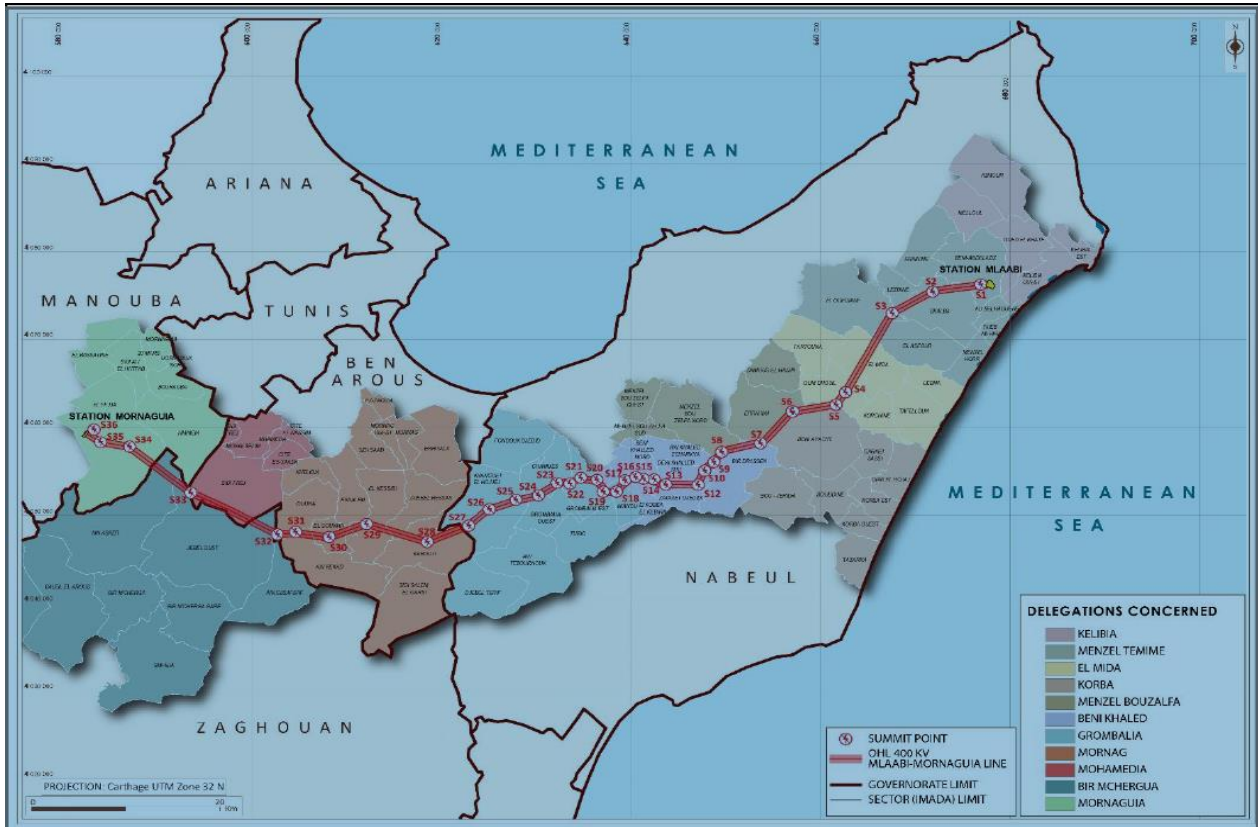
### 1.2 Project Description

The project involves the creation of a new marine high-voltage DC cable interconnection between Sicily on the Italian side and the Cap Bon peninsula in Tunisia (see **Figure 1**). On the Tunisian side, the project consists of a) a 10km underground cable from the marine cable landfall area to an Alternating/Direct Current (AC/DC) converter station in Mlaaba municipality, in the Cap Bon area; b) a new 400/225 kV substation in Grombalia; c) a new 400 kV double-circuit OHL of 65 km length from the new HVDC converter station to the 400 kV Grombalia 2 substation; and (iv) a new 400kV single-circuit OHTL of 51 km from Grombalia 2 substation to the existing Mornaguia substation in the greater Tunis area (see **Figures 2 and 3**),

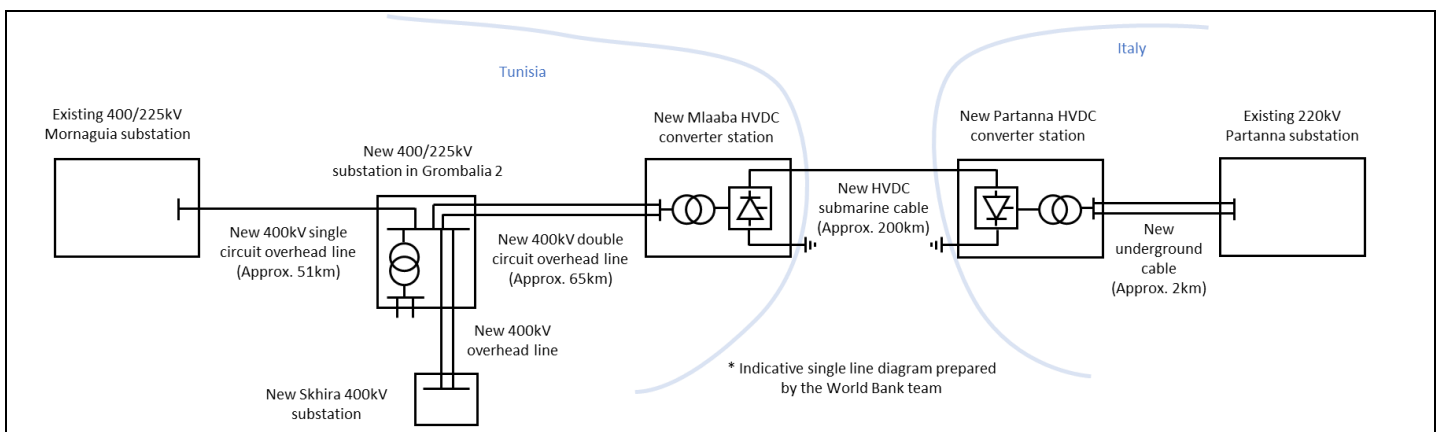


**Figure 1.1: Project Map**

The overhead line (OHL) crosses areas belonging to six delegations in the Nabeul governorate: Menzel Temime , El Mida, Korba, Menzel Bouzalfa, Beni Khalled and Grombalia; two delegations in the governorate of Ben Arous: Mornag and Mhamedia; one delegation in the governorate of Zaghouan: Bir Mchergua; and one delegation in the governorate of Manouba: Mornaguia. Associated works include facilities required during construction (work sites, crossings, construction sites, access roads) (see **Figure 2**).



**Figure 1.2: Route of the OHL and Administrative Units**



**Figure 1.3: Schematic diagram of the Project and associated facilities**

The potential social and environmental risks and impacts of the project are summarised in the ESIA.



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### 1.3 Purpose of Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) is an update on<sup>1</sup> that provided in 2018. This SEP states the requirements and processes for STEG to manage and facilitate future engagement through the Proposed Project's life in Tunisia. It is a guide to engagement with a focus on stakeholder identification, consultation planning and execution, including providing information and recording results and commitments by STEG to stakeholders. It also addresses grievances. Recording the ongoing engagement actions and results will need to be documented and updated as engagement occurs to influence the Proposed Project's activities and to inform ongoing and future stakeholder engagement.

The SEP defines a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to improve and facilitate decision-making and create a platform for communication that actively involves, and fosters in a timely manner, a common understanding between all project stakeholders, and that all groups are provided sufficient opportunities to voice their opinions and concerns, which may influence project decisions. The SEP is a useful tool for managing communications between STEG, their proposed project sponsors, project beneficiaries and project-affected persons.

The key objectives of the SEP can be summarized as follows:

- Understand the stakeholder engagement requirements of ESS10 and Tunisian legislation;
- Guide forward stakeholder engagement such that it meets good international practice;
- Identify key stakeholders that are affected and/or able to influence the proposed Project and its activities;
- Identify the most effective methods and structures through which to disseminate project information and to ensure regular, accessible, transparent, appropriate and meaningful consultations;
- Guide STEG to build mutually respectful, beneficial and lasting relationships with stakeholders;
- Develop and implement stakeholder engagement processes that provide stakeholders with an opportunity to influence project planning and design;
- Establish an effective Grievance Redress Mechanism;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on findings;
- Assist STEG in securing and maintaining a social license to operate throughout the life of the Project; and
- Provide tools and systems for the ongoing documentation of stakeholders, their concerns, grievances, and resolutions undertaken

### 1.4 Content of SEP

**Section 2** of the SEP defines the requirements of ESS10, other Work Bank documents and National laws and regulations. **Section 3** describes the stakeholder engagement activities conducted to date in Tunisia and their content. **Section 4** comprises an analysis and mapping of the stakeholders affected by the project or that have an interest in it. **Section 5** describes the stakeholder engagement programme, providing general information and recommendations on the activities that should be structured and carried out during the project lifecycle. **Section 6** defines roles, responsibilities and resources involved in the engagement activities. **Section 7** describes the Grievance Redress Mechanism (GRM), and **Section 8** describes monitoring, evaluation and reporting regarding the SEP activities.

### 1.5 Execution Plans

STEG will prepare an Execution Plan and related checklists summarising the key tasks identified in the SEP for Community Liaison Officers (CLOs) and contractors charged with implementing the SEP. These

<sup>1</sup> Republic of Tunisia, Feasibility Studies of the Tunisia -Italy Power Interconnection – Stakeholder Engagement Plan, ELMED Etudes SARL, April 2018

    			
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instruments will be summarised and incorporated into the Project Operational Manual (POM), which the borrower will submit to the Bank for approval. STEG will retain overall responsibility. These execution plans may be brought together in a simple booklet, in accessible French and Arabic language, explaining the requirements of the SEP and related social management plans. This booklet will be disseminated to all project direct workers and contractors.

## 1.6 SEP Update

This SEP will be updated as project development proceeds. This is particularly the case after stakeholder ESIA review, project appraisal, and final route selection. The SEP provides tools such as the Stakeholder Data Base to maintain ongoing documentation in these areas.



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## 2. ESS10 AND LEGAL REQUIREMENTS

### 2.1 Introduction

The Project is subject to a combination of World Bank requirements, national regulatory requirements and relevant international standards covering stakeholder engagement. This section summarises applicable World Bank, international legal and relevant Tunisian regulatory requirements. It is noted that the more stringent applies in the case of conflict between these standards.

### 2.2 ESS10 Requirements

Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure (ESS10) applies to the borrower's stakeholder engagement activities. Borrowers must identify and engage with relevant stakeholders around the World Bank-financed projects. A Stakeholder Engagement Plan (SEP) - this document - is required and should be consulted upon and disclosed in the country and by the World Bank before project appraisal.

The SEP will be carried out throughout project implementation and must be updated regularly to reflect possible changes in the stakeholder environment. The preparation of the SEP will be supported by an engagement process that includes stakeholder identification, analysis and mapping, alongside engagement planning, and disclosure of information to interested and affected stakeholders. It consists of meaningful consultation that is conducted in a culturally appropriate and gender and inter-generationally inclusive manner. Borrowers will ensure that a grievance redress mechanism (GRM) is established for the project, as described in ESS10, which is culturally appropriate and accessible to project-affected persons and considers the availability of judicial recourse and customary dispute settlement mechanisms. The GRM shall include procedures for handling SEA/SH cases.<sup>2</sup>

Actions to be completed before Bank Project Appraisal include the preparation, disclosure and implementation of the following:

- An ESIA, including a cumulative impact assessment and a biodiversity assessment;
- A Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan;
- A Resettlement Policy Framework (RPF);
- A SEP, including a GRM with specific procedures for SEA/SH case handling;
- A Labour Management Procedure (LMP);
- An Environmental and Social Management Plan (ESMP) to be embedded in the ESIA, including a worker camp management plan (if needed);
- A Biodiversity Action Plan (BAP);

### 2.3 Other World Bank Requirements

The scope of the present ESIA does not derive from requirements of national legislation, but from requirements of World Bank's Environmental and Social Framework. This framework sets out the World Bank's commitment to sustainable development through a set of Environmental and Social Standards (ESS), constituting mandatory requirements for the Borrower and the project.

According to the ESS Guidelines, the Environmental and Social Assessment should include an analysis of the proposed project's positive and negative physical, biological, social, economic and cultural potentials. It must include identifying and assessing the proposed project's direct, indirect and cumulative impacts in the area of influence defined by the Consultant.

The Environmental and Social Assessment will contain an assessment of the alternatives, including the "without project" scenario and a review of the direct and indirect impacts of the proposed project, include an discussion of alternate and preferred alternatives, and provide a framework for mitigation measures,

<sup>2</sup> World Bank, Concept Social and Environmental Review Summary – Italy-Tunisia Electrical Integration, ESRSCO3060, 10/24/2022, pp. 8

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monitoring activities, and strengthening of institutional measures that will need to be integrated into the project design and implementation (ESMP). As part of this process, it is expected that consultations will be undertaken, and the environmental and social study will be disclosed to the public.

Particular attention is to be paid to vulnerable people and communities in designing and implementing the consultation process. During public consultations, relevant project documents must be disclosed to stakeholders, PAPs and local NGOs with particular attention to vulnerable peoples. The SEP prepared and disclosed by STEG before project appraisal must be updated afterwards, based on new available information (e.g. final line route, land owners).

*Note: The draft ESIA (English version) was published on the STEG website ([www.steg.tn](http://www.steg.tn)) on 7 February 2023. The executive summary of the ESIA in French was published on the STEG website the same day.*

## 2.4 Tunisian Legal Requirements

Decree No 91-362 of 13 March 1991 regarding the preparation of environmental impact assessments, modified by the Decree No 2005-191 of 11 July 2005, provides the legislative framework regarding EIA in Tunisia. However, powerlines are exempt from this legislation. Additional requirements pertaining to public consultation and information disclosure include<sup>3</sup>:

- Organic Law No 2016-22 of 24 March 2016, on the information access right, which defines the access right to any information concerning programs, projects, benefits, financial aspects, owners;
- Organic Law No 2016-22 of 24 March 2016, on the information access right, which defines the access right to any information concerning programs, projects, benefits, financial aspects, owners, etc.;
- Decree No 328-2018 of 29 March 2018 concerning public consultation;
- Organic Law on n° 2018-29 of May 9, 2018, on Local Authorities Code, notably Section 5 of participatory democracy and open government from article 29 to article 37
- Law No 2011-41 of 26 May 2011, regarding access to administrative documents
- Article 38 of the Tunisian Constitution (July, 25, 2022), the State must guarantee the right of access to information;
- Article 139 of the Constitution, local authorities shall adopt all mechanisms of participatory democracy and open governance to guarantee the participation of citizens in the preparation of land use planning and development projects.

Organic Law No. 2016-22 of 24 March 2016 defines the right of access to information related to public administration programs and projects, benefits, financial information, etc.. While the ESIA is not clearly mentioned in the law but can be requested through an access to information form but is subject to acceptance or refusal by the competent authority. However, an appeal is possible to the national body of access to information created by the law mentioned above and functional since August 2017 by Government Decree No. 2017-918 of August 17, 2017, appointing members of the body of access to information.

Overall the provisions on social impacts and consultation in relation to EIAs remain very general in Tunisia. Although, per Article 32 of the Tunisian Constitution (2014), the State guarantees the right to information and access to information, To date, there is no obligation to publish EIA reports. However, several public companies such as STEG have started to publish EIA reports of new projects on their sites following the requirements of international financial institutions.

However, following Organic Law No 2018-29 of 9 May 2018 on Local Authorities Local elected councils are compelled to guarantee effective participation of population and Civil Society in preparation, implementation and evaluation of development projects and programs (Article 29). A local grievance mechanism is also

<sup>3</sup> ELMED Etudes SARL, Tunisia-Italy Power Interconnector Project ESIA and RAP Inception Report, 6/10/2022

			
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provided for by the same law (Article 30) as well as a referendum that the Local elected councils might initiate on development projects at the local level (Articles 31-33 ).

For the Tunisian side, the public consultations should be managed by STEG for the submarine cable, land-based and underground components and for the overhead line between Mlaâbi and Mornaguia.

					
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### 3. STAKEHOLDER ENGAGEMENT TO DATE

#### 3.1 World Bank Requirements

In accordance with World Bank standards, at least two public consultations are required during the drafting of the ESIA documents, with the first one aimed at collecting public concerns and the second one taking place during the drafting of the ESIA report. For the OHL, at least one public consultation is required.

#### 3.2 Initial Consultations in 2021

The first public consultations related to the Project were held on 8 June 2021 with the Governate of Nabeul with the presence of the authorities, public administration representatives, STEG, the ESIA Consultants (IDEACONSULT) and other stakeholders. The meeting introduced the relevance of this strategic project for the region and the country and collected concerns.

After this first contact, the ESIA Consultants initiated interviews with Nabeul's regional and local authorities from July through December 2021. These interviews were focused on providing information about the three alternatives for the landing points and to collect suggestions and comments in this regard, to present the options for the underground cable between the proposed landing point in each delegation (Kélibia, Menzel Temime and Menzel Horr) and the location of the Mlaâbi sub-station as well as with regard to the OHL route.

These engagements were conducted with representatives of Nabeul Governorate (local authorities, governor), local authorities and representatives of Menzel Temime, along with local sectoral Chiefs (Omdas) and community representatives, and representatives of the Delegations of Grombalia (town hall and technical services) of the communities of d'El Mida, Beni Khalled, Zaouiet Jedidi, Fondouk Jedid, and Kélibia, along with representatives of the local offices of SONEDE, STEG, and agricultural services, sectoral chiefs of Beni Khalled, Sidi Toumi and Kobba Kebira and the State Sanitation Services "ONAS". A summary of the consultations carried out to date is listed in **Annex 1**.

#### 3.3 Consultations in 2022/2023

To strengthen the participatory process, the Consultant organized, in coordination with ELMED/STEG, public consultations in each of the four concerned Governorates, during February-March 2023. The specific objectives of public consultation sessions include:

- i. Presenting the main results of the ESIA;
- ii. Collecting opinions, comments and recommendations from stakeholders;
- iii. Describing and considering the different feedbacks;
- iv. Informing on Project analysis of alternatives.

Targeted audiences include::

- v. Representatives of the Regional Authorities: Governorates (Nabeul, Ben Arous, Zaghouan and Manouba);
- vi. Representatives of the Regional Directorates of Agriculture (+ Forests), Equipment, Energy, State Domains, Environment, ANPE, APAL, Culture and Heritage;
- vii. Representatives of Local Authorities, including those of the Municipalities concerned;
- viii. Representatives of Civil Society: NGOs and other associations active in the field of environment and local development;
- ix. Representatives of the local populations/communities.

A summary of these consultations is also provided in **Annex 1**.

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*Note: STEG is conducting an administrative consultation with several ministries and administrations for the OHL component to obtain their input and opinion regarding the proposed OHL route. The ESIA study describes and considers the feedback provided as part of the stakeholder engagement process.*

### 3.4 Consultations with NGOs

In addition, the Consultant has started a consultation process with the civil society representatives in the project area of influence, specifically in the Governorates of Ben Arous, Manouba, Zaghouan and Nabeul (see below). This process began with a working session with the Association “Les Amis des Oiseaux” (AAO), an NGO specialising in observing bird migration and counting and proposing measures to limit the impact on birdlife in the project area. The head of the association emphasised the need to conduct investigations to identify bird mortality hot spots along existing HV lines and involve the AAO in the design of the proposed OHL.

The civil society consultation process involved the following steps:

- Step 1:** The Consultant identified the most active associations in the field of the environment, nature protection, ecology and local development to establish a mailing list. The list of NGOs consulted on the project's impacts is set out in **Table 3.4** below.

**Table 3.4: List of NGOs consulted in the framework of the ESIA**

NGOs Consulted	Field of Intervention	Intervention Area	Contact Details
1. <b>Ecologistes Sans Frontières ESF</b>	Ecology, Biodiversity	Governorate of Ben Arous, Manouba, Zaghouan and Nabeul (National Level)	<a href="mailto:ecolof@gmail.com">ecolof@gmail.com</a>
2. <b>Association Internationale pour la Coopération et le Développement Durable AICD</b>	Nature Protection, Local Development	Governorate of Ben Arous, Manouba, Zaghouan and Nabeul (National Level)	<a href="mailto:aicd.tunisie@gmail.com">aicd.tunisie@gmail.com</a>
3. <b>Association de Développement et Citoyenneté ADC</b>	Local and social Development, Environment	Governorate of Zaghouan	<a href="mailto:akram.benaissa@yahoo.fr">akram.benaissa@yahoo.fr</a>
4. <b>Green Heart Tunisia</b>	Environment	Governorate of Manouba	<a href="mailto:coeurvert123@gmail.com">coeurvert123@gmail.com</a>
5. <b>Association Jebel Abderrahman pour l'Environnement et le Développement Durable AJAEDD</b>	Local Development, Environment	Mountain of Abederrahmane, Center of Cap Bon, Governorate of Nabeul	<a href="mailto:maesdaecovert@gmail.com">maesdaecovert@gmail.com</a>
6. <b>Association de l'Environnement et du Développement de Soliman AEDS</b>	Local Development, Environment	Soliman Delegation, South west of Cap Bon, Governorate of Nabeul	<a href="mailto:aedssoliman@gmail.com">aedssoliman@gmail.com</a>
7. <b>Association culturelle et Environnementale de Kélibia ACEK</b>	Environment, Culture	Kélibia Delegation, North East of Cap Bon, Governorate of Nabeul	<a href="mailto:jenhani.wahid@gmail.com">jenhani.wahid@gmail.com</a> , <a href="mailto:a.c.ekelibia@gmail.com">a.c.ekelibia@gmail.com</a>
8. <b>Association Tunisienne de Protection de la Nature et de l'Environnement ATPNE - Korba</b>	Environment,	Korba Delegation – lagoons of Cap Bon, Governorate of Nabeul	<a href="mailto:houdaboufaied@yahoo.fr">houdaboufaied@yahoo.fr</a>
9. <b>Association pour la Sauvegarde de Patrimoine Ecologique et Naturel du Cap Bon ASPEN</b>	Bird Watching, Ecology	Haouaria Delegation – North Cap Bon, Governorate of Nabeul	<a href="mailto:miladibayrem@gmail.com">miladibayrem@gmail.com</a>



						
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**2. Step 2:** The Consultant designed a survey form and sent it to the identified NGOs. The survey questionnaire includes:

- a general presentation of the project (with a map identifying the route of the lines and the stations),
- a table with information about the NGO and
- five questions about the project's impacts and the mitigation measures to be implemented.

Below an example of a sample response to the survey questionnaire is provided. It relates to the ASPEN Association, whose responses were as follows:

**Question 1: Briefly present your Association: Name, Date of creation, field of intervention, main actions**

Name: Association pour la Sauvegarde de Patrimoine Environnemental et Naturel du Cap-Bon

Acronym: ASPEN

Date of creation: 2008

Main activities:

- The study and preservation of ecosystems, biodiversity and natural landscapes on the Tunisian territory, particularly the Cap Bon and especially the marine and protected coastal area (Archipelago of Zembra and the mountain and coast of Haouaria);
- Raising public awareness of the importance of the richness of the natural and environmental heritage and the need to safeguard it;
- Involvement of the local population in activities to limit anthropic pressures on the ecosystem and the environment, particularly solid waste pollution, especially plastic.

**Question 2: Are you familiar with the Project: ENVIRONMENTAL AND SOCIAL IMPACT STUDY AND RESETTling ACTION PLAN FOR THE TUNISIA - ITALY INTERCONNECTION?**

I have been aware of this project for a long time (almost 2004) due to my geographical location at the north-eastern end of Cap Bon, at the entrance to the Gulf of Tunis, and I have also been exposed in the last few days on social networking sites to the news that the European Union has agreed to fund this project.

**Question 3: To what extent do you think the project will have negative impacts and risks on biodiversity in the areas crossed by the HV lines, particularly on birdlife (Specify the intensity and type of impact)**

• **CONSTRUCTION PHASE**

The access of large, long, heavy machinery to the construction site (during the construction and pre-construction phase) and the planned transits will primarily impact the existing soil and flora, which may be sensitive to direct destruction by trampling and/or passing machinery and dusting of foliage. Construction activities and land clearing will mark this phase. In addition to the fact that this degradation of the soil and vegetation cover will destroy key species for the supply of birds and bats (mainly insects), it will cause the disturbance of bird nesting in the vicinity of the projected sites.

Indeed, the 3 main potential impacts of construction activities on birdlife will be

- The destruction and degradation of breeding bird habitats and nests, both on the vegetation and on the ground, mainly related to the installation of the construction site and its infrastructures and the creation of access roads. This leads to fragmentation and loss of habitat used by birds for breeding and feeding.
- Bird mortality caused by collisions with site vehicles.
- Disturbance and disturbance, especially noise, caused by the operation of heavy machinery and construction workers. The last two impacts will also affect bats.

• **OPERATION PHASE**

The risks to birds can be addressed based on their flight behaviour. These risks will result in 3 significant impacts on avifauna:

- The risk of collision of birds with power lines and poles; this risk is accentuated by bad weather or by night flight for certain species, particularly migratory birds, especially since it is known that more than the majority



of the movements of gliding birds, including raptors, take place at risky altitudes, especially during the two migrations

- The risk of disturbance generated by workers during maintenance activities.
- The risk of a barrier effect manifests itself by removing certain bird species, especially gliders, during migration to alternative routes, initially less favourable and qualified as risky (other power lines, roads, hunting areas, etc). Sedentary birds hardly feel this impact.

**Question 4: What measures and/or actions do you recommend, as an association, to reduce the risks and negative impacts on negative impacts on biodiversity (birdlife)?**

Potential impacts can be more or less severe on biodiversity depending on the project phases and/or areas of use. To properly investigate the sensitivities of the targets (landscape, fauna, flora etc.) and the magnitude of each impact revealed, a specific impact study following standardized and approved protocols must be carried out along the project area which will cross sensitive areas and several types of critical mountain and wetland habitats.

We therefore recommend a full study through a biodiversity expert who can be contacted if required.

**Question 5: Do you have any additions, remarks or additional observations? If so, please list them below.**

No additional observations.

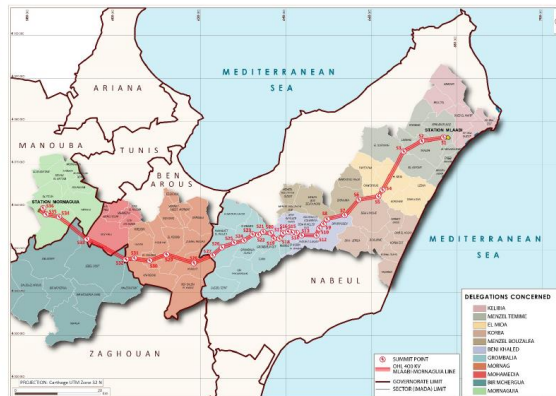
### QUESTIONNAIRE PARTIE PRENANTE

#### ETUDE D'IMPACT ENVIRONNEMENTAL ET SOCIAL EIES ET PLAN D'ACTION DE REINSTALLATION PAR POUR L'INTERCONNEXION TUNISIE / Italie

projet ELMED consiste à relier l'Italie à la Tunisie par câble électrique sous-marin HVDC d'environ 200 km de longueur. L'interconnexion comprendra aussi une rpsante terrestre dans chaque pays permettant de connecter les deux stations de conversion à la partie sous-marine. La composante tunisienne comprend également la liaison aérienne qui sera mise en place entre la station de Menzel Temime et la station de Monragula sur 124 km. IDEACONSULT intervient pour l'élaboration de l'étude d'impact environnemental et social EIES et du plan d'action de réinstallation PAR des différentes composantes du projet.

Les prestations qui seront assurées par le bureau sont les suivantes :

Accompagner le Client ELMED dans le choix de différentes options de pose et d'atterrissage du câble afin de minimiser au maximum les impacts négatifs sur l'environnement et le milieu humain. Une attention particulière sera attribuée aux milieux naturels fragiles et protégés (herbier sous-marin, sites RAMSAR, sites IBA, etc.) lors de l'élaboration des options de pose et d'atterrissage du câble ; Identifier les impacts directs, indirects et cumulatifs sur les différentes composantes de l'environnement concerné par le projet (biodiversité terrestre et marine, pollution, paysage, archéologie, milieu humain, etc.) ; Informer les parties prenantes et les populations affectées PAP à travers des consultations publiques organisées dans les zones concernées par le passage du câble



Nom de l'association	Association pour la Sauvegarde de Patrimoine Environnemental et Naturel du CapBon (ASPEN)
Responsable de l'Association	Kamel El Jed (Président)
Personne ayant rempli le questionnaire	Bayrem Miladi (Ecogarde AMCP Zembra)
Date	20 janvier 2023

**1. Présentez succinctement votre Association : Nom, Date de Création, domaine d'intervention, principales actions (vous pouvez joindre un document de présentation)**

- **Nom** : Association pour la Sauvegarde de Patrimoine Environnemental et Naturel du CapBon
- **Acronyme** : ASPEN
- **Date de création** : 2008

**Activité principale de l'ASPEN**

- L'étude et la préservation des écosystèmes, la biodiversité et les paysages naturels sur le territoire Tunisien particulièrement le Cap BON et surtout l'aire marine et côtière protégée (Archipel de Zembra et la montagne et les côtes de Haouaria) ;
- Sensibilisation du public sur l'importance de la richesse du patrimoine naturel et environnemental et la nécessité de le sauvegarder ;
- Implication de la population locale dans les activités de limitation des pressions anthropiques sur l'écosystème et l'environnement particulièrement la pollution en déchets solides surtout le plastique.

**2. Avez-vous eu connaissance du Projet : ETUDE D'IMPACT ENVIRONNEMENTAL ET SOCIAL EIES ET PLAN D'ACTION DE REINSTALLATION PAR POUR L'INTERCONNEXION TUNISIE - ITALIE ?**

J'ai pris connaissance à ce projet depuis longtemps (presque 2004) vu ma situation géographique à l'extrémité nord-est du cap Bon, à l'entrée du golfe de Tunis, et j'ai également été exposé dans les derniers jours sur les sites de réseaux sociaux aux nouvelles que l'Union européenne a accepté de financer ce projet.

	<p><b>3. Dans quelle mesure, pensez-vous, que le projet aura des impacts négatifs et des risques sur la biodiversité dans les zones traversées par les lignes HT, notamment sur l'avifaune ? (précisez l'intensité et le type d'impacts)</b></p> <p><b>PHASE DE CONSTRUCTION</b></p> <p>L'accès des engins exceptionnels, longs et volumineux sur le lieu des travaux (en phase de construction et pré construction) et les transits envisagés impacteront en premier lieu les sols et la flore existante qui sont peut-être sensibles à la destruction directe par piétinement et/ou passage d'engins et l'empoussièrement des feuillages. Cette phase sera marquée par les activités de construction et de défrichage des sols. Outre que cette dégradation du sol et couvert végétal détruira des espèces clés pour l'approvisionnement des oiseaux et des chauves-souris (insectes essentiellement) elle causera la perturbation de la nidification des oiseaux aux abords des emplacements projetés. En effet, les 3 principaux éventuels impacts qu'exerce les activités de construction sur l'avifaune seront :</p> <ul style="list-style-type: none"> <li>-La destruction et la dégradation des habitats et des nids d'oiseaux nicheurs, tant sur la végétation que sur le sol, liées principalement à l'installation du chantier et ses infrastructures et la création des routes d'accès. Ceci entraîne une fragmentation et perte d'un habitat utilisé par les oiseaux pour se reproduire ou s'alimenter.</li> <li>-La mortalité des oiseaux causée par les collisions avec des véhicules du chantier.</li> <li>-Dérangement et perturbation, surtout sonore, causés par le fonctionnement des machines lourdes et les travailleurs de la construction. Les deux derniers impacts concerneront aussi les chauves-souris.</li> </ul> <p><b>PHASE D'EXPLOITATION</b></p> <p>Les risques encourus par les oiseaux peuvent être abordés en se basant sur leur comportement en vol. Ces risques engendreront 3 impacts majeurs sur l'avifaune :</p> <ul style="list-style-type: none"> <li>-Le risque de collision des oiseaux contre les lignes et poteaux électriques ; ce risque est accentué par mauvais ou par le vol de nuit pour certaines espèces particulièrement les migrateurs surtout qu'il est connu que plus que la majorité des mouvements des oiseaux planeurs y compris les rapaces fréquentent des altitudes à risque, surtout pendant les deux migrations.</li> <li>-Le risque de perturbation générée par les travailleurs au cours des activités d'entretien.</li> <li>-Le risque de l'effet barrière qui se manifeste par l'éloignement de certaines espèces d'oiseaux, surtout les planeurs, pendant la migration vers des itinéraires alternatifs, initialement moins favorables et qualifiées de risquées (autres lignes électriques, routes, espaces de chasse, etc). Cet impact est peu ressenti chez les oiseaux sédentaires.</li> </ul>	
	<p><b>4. Quelles sont les mesures et/ou les actions que vous préconisez, en tant qu'association, pour diminuer les risques et les impacts négatifs sur la biodiversité (avifaune).</b></p> <p>Les impacts potentiels peuvent être plus ou moins sévères sur la biodiversité selon les phases de projet et/ou les zones de fréquentation. Afin d'investiguer correctement les sensibilités des cibles (paysage, faune, flore etc) et la magnitude de chaque impact révéler, une étude d'impact spécifique suivant des protocoles standardisés et approuvés doit être effectuée le long de la zone de projet qui traversera des zones sensibles et plusieurs types d'habitats critiques montagnards et humides. Nous recommandons alors une étude complète à travers un expert en biodiversité qu'on dispose les coordonnées si vous en avez besoin.</p> <p><b>5. Avez-vous des ajouts, remarques ou observations complémentaires ? si oui prière de les lister ci-dessous</b></p>	

- 3. Step 3:** The Consultant met with institutions and NGOs active in the field of the environment to present the conclusions of the Environmental and Social Impact Assessment (ESIA) and the draft Biodiversity Management Plan (BMP) consult them on the ELMED Project. The meeting was held on 22 March 2023, at STEG's head office. The key issues identified during these consultations are summarised in **Table 3.5** below.

**Table 3.5: Key Issues from NGO Consultations**

Institution	Questions / Comments	Answers (STEG / Consultant)
IUCN	What is the energy source for the Project? Is it solar energy?	It is an interconnection between the electricity networks of Tunisia and Italy, supplied from different energy sources
AAO-BIRDLIFE	Has the Consultant obtained from STEG the history of the collision of birds with power lines?	STEG has no history for the collision of birds with High Voltage (HV) lines. Records of collision cases are limited to Medium Voltage (MV) lines where interventions and maintenance operations are more frequent. In addition, according to a STEG official, bird collisions with HT lines are rare.
AAO-BIRDLIFE	How was the width of the collision risk zone for avifauna determined knowing that there are	The risk of collision with the overhead line is at two levels: <ul style="list-style-type: none"> <li>• Risks of collision of migratory birds whose migration corridor is known. The superimposition of the line's route with this corridor made it possible to clear a collision risk zone extending over ten kilometres. The mitigation measures for these risks consist of</li> </ul>

Institution	Questions / Comments	Answers (STEG / Consultant)
	several wetlands in the Cap-Bon area with bird movements between these feeding areas, rest, etc. ?	installing anti-collision beacons on the section of the overhead line interfering with the bird migration corridor (10 km) <ul style="list-style-type: none"> <li>Collision risks for birds moving locally between the different wetlands and forests on either side of the overhead line route. The mitigation measures consist of providing anti-collision devices to be installed at the level of the sections of the line following the conclusions of the investigations and additional studies intended to better understand the behavior and movement of birds in the project area.</li> </ul>
<b>AAO-BIRDLIFE</b>	Will the overhead line pass through the Jbel Sidi Abderrahmen ridge? Isn't the risk of bird collision greater at this level?	The overhead line will pass at the foot of Jbel Sidi Abderrahmen. This mountain forms the limit of the bird migration corridor.  This section of the overhead line runs parallel to the bird migration corridor and therefore, the risk of collision is low
<b>IUCN</b>	Have compensation measures been considered?	The Project is not likely to cause impacts on the flora requiring compensation measures. It is above all the avoidance and reduction measures that have been favored within the framework of the ESIA, the ESMP and the BMP.
<b>IUCN</b>	The IBAT tool for characterizing biodiversity at the scale of the project's area of influence was used, but have additional investigations been planned?	Yes, a detailed program of additional investigations is drawn up as part of the ESMP and the BMP. These additional investigations are intended to ensure better knowledge of biodiversity and ecosystem services at the scale of the project's area of influence.
<b>IUCN</b>	Where can new comments and questions from other IUCN specialists be sent?	As part of the Stakeholder Engagement Plan (PEPP) developed for the Project, STEG will designate a resource person who will oversee the implementation.  For the moment, comments and questions can be addressed to the representative of STEG and that of the Consultant. Please note that these emails must arrive before 03/24/2023 to be taken into consideration before submitting the deliverables to the World Bank.
<b>AAO-BIRDLIFE</b>	What is the area of the Posidonia meadow impacted by the work to lay the submarine cable?	The horizontal directional drilling technique will allow the submarine cable to pass under the Posidonia meadow approximately 1,000 m from the coast. A furrow of 15 to 20 cm will be dug in the meadow on the rest of the area. The area of the Posidonia meadow impacted by the work is therefore limited.
<b>AAO-BIRDLIFE</b>	Why not consider underground cable passage over a longer distance, avoiding negative impacts and risks,	It's a matter of cost.  Underground cable costs 10 times more than overhead line.
<b>AAO-BIRDLIFE</b>	What about optimizing the route of the submarine cable?	ELMED has entrusted the RINA/COMETE consortium with underwater studies and investigations in Tunisia and Italy. These studies made it possible to choose an optimized route considering the existing constraints.
<b>IUCN</b>	Why only the Association des Amis des Oiseaux	The invitation has been sent since last week to 18 Associations, NGOs and Institutions active in the field of the environment. These associations

    			
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Institution	Questions / Comments	Answers (STEG / Consultant)
	(AAO) participated in this meeting?	have been consulted by email since January 2023 but only a few have responded

Details on meeting attendance with NGOs is provided in **Annex 3**.

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#### 4. SYNTHESIS OF ENGAGEMENT PROCESS TO DATE

In the first stage, information on the project was limited to the meetings held with the regional authorities (Governorates and delegations) and the notice of inquiry displayed in the headquarters of the delegations. This WAS established by the Ministry of Industry, Mines and Energy (Ministry supervising STEG) pursuant to the decree of May 30, 1922 (see Figures below).

To this end, Notices of Inquiry were posted in Arabic and in French providing information about the ELMED Project, stating that:

- The technical file relating to the project, including the list of private owners concerned by the passage of the line will be made available to the public, at the headquarters of the governorate of Nabeul, from the publication of this notice of inquiry and until at the end of a period of three days from its insertion in the Official Journal of the Republic of Tunisia.
- The interested parties can read this file and submit their observations or possible complaints to the governorate concerned.

The key issues identified during the first engagements carried out in Nabeul Governorate in 2021 include the following:

- The need to present the plans and technical data of the Project to the competent authorities before the start of the works to obtain the necessary authorisations/permits;
- The need for the ESIA consultants to consult the local and regional authorities, in particular: the Regional Directorate for Equipment and Housing, the Coastal Protection and Planning Agency and any other service deemed important for the realization of the Project;
- The routing of the underground cable through the urban part of Menzel Temime and the impacts of the works on existing infrastructure, economic activities and traffic;
- The feasibility of avoiding the urban center of Menzel Temime to avoid this problem;
- The impact of the project on agricultural activities and the need to put in place compensation measures for the people affected;
- The preference for the route of the line to go through state lands to reduce the impact on private properties and to avoid conflicts with local populations, in particular in areas of arboriculture;
- The preference for an underground cable instead of an aerial component through critical areas, with the buried alternative following existing roads to minimize the impact on the landscape and the damage to private properties (agricultural land);
- Concerns over the routing of the 400kv OHL close to areas earmarked for urban and commercial expansion by the town hall of Beni Khalled; and
- Concerns over the impact of the OHL on agricultural land (citrus orchards) and the impact of a new OHL on phytosanitary treatment operations, applied by plane.
- Concerns over the social impact of the OHL, especially in the part of the delegation bordering with Beni Khalled;
- Concerns over the adequacy of compensation for farmers impacted by the OHL, with a preference for land compensation equivalent to that impacted by the project instead of receiving monetary compensation;
- The project needs to improve the existing electricity network (transition to a three-phase system) and electrification of the area, which is poorly served by electricity with many cuts (especially during the summer), to enhance the social acceptability of the Project.

In addition, ELMED received responses from stakeholders who sent correspondence to the Ministry of Industry, Energy and Mines. The synthesis of the different opinions obtained is presented in **Table 4** below.

**Table 4: Synthesis of Institutional Stakeholder Feedback in 2022**

Date	Stakeholder(s)	Opinion
September 22, 2022	Regional Director of State Domains and Lands Affairs (Nabeul)	<ul style="list-style-type: none"> <li>- Assign a representative from STEG to participate in the necessary topographic survey</li> <li>- Provide the plans of the project's perimeter of intervention</li> </ul>
October 06, 2022	Minister of Interior	<ul style="list-style-type: none"> <li>- The need to meet international safety standards</li> <li>- Carry out the work at a distance of 25 m from the axis of regional road 27 and 20 m from the axis of other roads</li> <li>- Take into account the existing irrigation channels around the Mlaâbi dam</li> <li>- Coordinate with the different competent administrations for the installation of the water chambers</li> </ul>
October 10, 2022	Representatives of Industrial Property Agency (AFI)	Minutes of meeting: <ul style="list-style-type: none"> <li>- The agency agrees to the granting of a subdivision for the station in the Mlaâbi in the industrial Zone</li> <li>- The plot boundaries for the station have been determined</li> <li>- The lines should not cross the allotments in the industrial estate</li> </ul>
24 October 2022	Minister of National Defense	<ul style="list-style-type: none"> <li>- The Ministry has no objections to the implementation of the Project</li> <li>- Send the details of the project components to the Consultative Commission for Maritime Activities in accordance with Decree No. 1836 of 15 September 1997</li> </ul>

Since February 2023, STEG has set up a complete team for the management of the project and has organized in each of the four governorates a day of information and consultation of stakeholders on the project as well as a meeting of information and consultation of NGOs and institutions active in the field of the environment. The results of these consultations are summarized above.

In addition, the French version of the ESIA summary (in two parts) has been published on the STEG website ([www.steg.com.tn](http://www.steg.com.tn)) for wide dissemination, pending the finalization of the environmental and social studies reports and their publication on the websites of STEG and the World Bank.



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## 5. FORWARD STAKEHOLDER ENGAGEMENT

In keeping with the provisions of ESS10, stakeholder consultation will be a continuous process throughout the Project and will be expanded to include PAPs and vulnerable groups. The list of stakeholders will be updated as consultations continue per the direction in Chapter 4 of this SEP. The ESIA study will describe and consider public feedback and the stakeholder engagement process.<sup>4</sup> The SEP will be updated regularly. However, tools outlined in this SEP will be used in ongoing consultation to maintain a formal and accessible record for daily use by CLOs and others involved in engagement processes. These tools include:

- Stakeholder List (Section 4.1, 4.2)
- Stakeholder Data Base (Section 4.2)
- Stakeholder Prioritisation (Section 4.3)
- List of Impacts and risks identified through consultation (Annex 2)
- Library of documents and information provided during consultation or on line (Section 5.2, 5.2.1)

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<sup>4</sup> Ibid., p 46

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## 6. STAKEHOLDER ANALYSIS AND MAPPING

### 6.1 Stakeholder Analysis

Stakeholder analysis determines the likely relationship between stakeholders and the Proposed Project. It helps to identify the appropriate consultation methods for each stakeholder group during the life of the Proposed Project. To this end, a process for determining the environmental and social risks and impact of the Project/Proposed Project will be established, along with identifying stakeholders and their stakes. The risks and impacts identification process will be based on recent environmental and social baseline data at an appropriate level of detail.

Ongoing stakeholder identification and analysis will be carried out to identify:

- Who will be adversely affected by potential environmental and social impacts in the Proposed Project's area of influence;
- Who are the most vulnerable among the potentially impacted, and where special engagement efforts are necessary;
- At which stage of the Proposed Project development will stakeholders be most affected (e.g. procurement, construction, operations, decommissioning);
- What are the various interests and concerns of Proposed Project stakeholders and what influence might this have on the Proposed Project;
- Which stakeholders might help to enhance the Proposed Project design or reduce Proposed Project costs;
- Which stakeholders can best assist with the early scoping of issues and impacts;
- Who strongly supports or opposes the changes that the project will bring and why;
- Whose opposition could be detrimental to the success of the Proposed Project;
- Who is critical to engage with first, and why; and
- What is the optimal time schedule of actions.

Since the Proposed Project is expected to involve physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts on affected communities and other stakeholders, the Project will identify the affected communities. It will meet the relevant requirements described below.

### 6.2 Stakeholder Identification and Analysis

ESS10 provides the definition of "stakeholder" that refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties P-AP); and (b) may have an interest in the project (other interested parties OIP). The following analysis is based on the initial stakeholder mapping and analysis performed in 2018 and updated in 2020.

Given the lack of a national standard model of a SEP, STEG is following the content prescribed in ESS10. Actions have started with the identification of local communities partially affected and/or directly involved in the development of the Proposed Project. With the assistance of the ESIA and RAP Consultant, the Stakeholder Analysis and Categorization process will be fine-tuned and completed. Categories of local Stakeholders are identified in Table 6.1 below and categories of national stakeholders are shown in Table 6.2. These tables are indicative and should be expanded as needed. Starting with stakeholder identification and carrying through stakeholder contacts and engagement the following information will be recorded in a Stakeholder Data Base (SDB):

- Name;
- Organisation;
- Contact details;
- Direct or indirect impacts by the Project;
- Issues and/or impacts related to the Project;

    		
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- Influence;
- Risks to Project;
- Prioritisation;
- Commitments made to stakeholders.

Concerning 'commitments', it is important to note that during the meetings, it is probable that STEG will receive requests for further information or undertakings in terms of additional meetings, impact mitigations or benefits. Any undertakings to these requests must be recorded as part of the meeting results and database and should be assigned and followed up accordingly.

The SDB is an important tool in maintaining the stakeholders' records, interests, and actions that need to be undertaken. The SDB should also recognise the responsible function in STEG for addressing the action, the timing and recording completion. The SDB becomes an essential source of information for any audits or reviews by management, the World Bank or other parties.

**Table 6.1: Local Community Stakeholder Categories**

Local communities subcategories	Tunisia
Landowners whose property is impacted by the proposed project (PAP)	Citizens interested by the establishment of easement rights.
Associations representing local interests	Associations representing – at local level – economic interests (e.g. Agricultural Cooperatives, UTICA), social interest (nonprofit organizations) and environmental interests (Les Amis des Oiseaux, Association de la Protection de la Nature El Haouria)
Local media	WEB, Radio Cap FM, National TV Channels
Local administrators (local authorities) (PAP)	Governorates (Ben Arous, Nabeul and Manouba); Mayors of the Region and theirs Delegates
Local suppliers/contractors and subcontractors	Suppliers/Contractors of civil works of the Grand Tunis and Cap Bon Areas
Landowners whose property is crossed by an existing line (PAP)	Landowners whose land is already subject to an easement right
Local committees (against the project) (PAP)	To be identified
Local politicians (PAP)	Trade Unions (UGTT) and Political Parties
Local opinion makers	Local community influencer, variable roles depending on the specific community
Infrastructural sector companies	Companies owning infrastructure with local presence (e.g. Gas, Railways, Roads, Telecommunication)
Other citizens impacted by the proposed project (PAP)	Citizens immediately outside the easement zone (only visual impact, no property crossed)
Other local authorities	Regional offices of the Ministries of Agriculture (DG des Forets, RC Developpement Agricole, DG des Peches) and of the Environment (APAL, ANPE), Institut National du Patrimoine
Other citizens impacted by existing lines	To be identified
Community Based Organisations (CBO) (PAP)	Such as mosques and churches

The map of the actual local stakeholders impacted / interested by the Project will be defined together with the ESIA and RAP consultant. While PAPs will receive priority attention the analysis of all Stakeholders will identify the level of ongoing engagement required for each case. Table 6.2 below sets out a **preliminary**

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identification of Project stakeholders at the national and community level. The list will be expanded as needed, with full details on each stakeholder recorded in the SDB.

**Table 6.2: Stakeholder Identification**

Level	Sub Category	Stakeholders
National Level Stakeholders	Central Administration	Environment Ministry Ministry of Energy Ministry of Agriculture Ministry of Equipement, Housing and Spatial Planning STEG National Environment Agency Agence (ANPE) Agency for the Protection of the Coastal Zone (APAL) National Agency for the Management of Wastes (ANGED) National Institute of Cultural Heritage (INP) Agency for Industrial Development (Agence Foncière Industrielle - AFI)
	Other (associations)	Association "Les Amis des Oiseaux" (friends of birds) Tunisian Association for the Protection of Nature and the Environment (ATNPE) Tunisian Association for the Protection of the Environment and Archéological Sites (ATPESA) Union of workers in construction companies NGOs focused on gender issues (e.g. Association of Tunisian Women for Research and Development ("AFTURD"), Association Tunisienne des Femmes Démocrates, National Observatory for the Fight against Violence against Women <a href="https://www.facebook.com/profile.php?id=100069006046542">https://www.facebook.com/profile.php?id=100069006046542</a> )
Regional and Local Stakeholders (identified as part of the ESIA)	Regional authorities and communities (délégations and commune)	Gouvernorates: Nabeul, Ben Arous, Zaghouan et Manouba and Délégations Communes : Kélibia, Menzel Temime, Korba, El Mida, Menzel Bouzelfa, Beni Khalled, Zaouiet Djididi, Grombalia, Fondouk Jedidi, Mornag, Mohamedia, Bir Mchergua et Mornaguia Neighbouring populations located along the OHL and the underground cable and the converter station Sectors/Imadas crossed by the project
	Regional Administration	Regional deveelopment directorates (Nabeul, Ben Arous, Zaghouan and Manouba) Regional Agricultural Commissariates (one in each gouvernorate) Regional représentation of ANPE (National Environment Agency - North East Region) Regional Environment Directorates Regional Directoratees of Equipment/Infrastructure (one per gouvernorate) STEG SONEDE (Société Nationale d'Exploitation et de Distribution des Eaux - National Company for the Exploitation of Water) ONAS (Office Nationale de l'Assainissement - National Office for Sanitation) Regional Représentation of APAL (National Agency for Coastal Protection) in Nabeul Regional Représentations of the INP (National Institute for Professional Education)
	Populations	Propriétaires (Private landowners) Communities et neighbouring persons in the AoI Shopkeepers Artisans

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Level	Sub Category	Stakeholders
		Industries Farmers, fishermen and cultivators
	Other	Association - Friends of Birds (Cap Bon section) Industrial Zone of Menzel Yahia (existing zone, close to the landfill of the cable) Industrial Zone of Mlaâbi (in construction)

*Note: As noted below in Section 6.2, a key action for the project will be to carry out further stakeholder identification and mapping to inform the forward engagement process prior to construction.*

### 6.2.1 Disadvantaged / Vulnerable Individuals or Groups

Disadvantaged/vulnerable individuals and groups are those who may be more adversely affected by the Project impacts and/or more limited than others in their ability to take advantage of the Project's benefits. They may not have the voice and agency to express their concerns or understand the impacts of the project, and can thus be excluded from stakeholder engagement or project benefits.

Vulnerable groups in this project Area have been identified in the ESIA report and may include persons with disabilities, illiterate people, large families with more than five dependent children below 15 years (legal employable age with some limitations), youth, youth between 15-29 years neither in employment nor in education or training (NEETs), women and women-headed households, households registered as poor, elderly households with no means of livelihood (or not earning) and households with disabled members, as well as internally displaced persons and migrants or transient users of lands affected.

The project will incorporate differentiated measures to ensure that these groups receive project-related information, are consulted with, and have the means to participate and express their views and concerns on the project. During consultations with communities and individuals, discussions will include the identification of vulnerable groups and the undertaking of separate and inclusive meetings. After conducting public consultations with the residents, issues and concerns expressed by vulnerable and disadvantaged groups, along with actions to address them, will be recorded in the SDB. If additional means of engagement are required these will be further developed and highlighted in the SEP.

## 6.3 Summary of Stakeholder Interest in and Influence over the Project

A key part of the mapping is the prioritization of the stakeholders in terms of the degree they are concerned with, or impacted by the Project and the degree to which they can impact the Project. This will be done through input from the respective stakeholders and the Project's assessed impact on the stakeholders. As is noted in Section 6.2.1, Table 4.3 provides the system by which stakeholders will be assessed.

This mapping also provides a means of defining the degree of contact that STEG should maintain. In general, Project information should be available to all stakeholders, however, more attention will be devoted to ensuring information is given and input received with those of high and medium importance.

**Table 6.3: Stakeholder Prioritisation Matrix**

		Ability or Likelihood to Influence or Impact the Project		
		Low	Medium	High
Level of Interest in the Project	High		High stakeholder concern	
	Medium	Not critical to project's success		Highly critical to project's success
	Low		Low stakeholder concern	

Note:  
**Red stakeholder** = high/critical importance, ongoing contact  
**Green stakeholder** = medium importance, keep informed  
**White stakeholder** = interest group – information should be made available

Using the tool in Table 6.3 in assessing the stakeholder priorities, their 'interest' and 'influence' on the project were preliminarily identified to comprehend their situation better and manage them appropriately an **indicative** list is included in Table 6.4. This Table needs to be expanded to include all stakeholders. As noted above, as contact with the stakeholders proceeds their actual level of interest should be reconfirmed and their positioning can be adjusted accordingly. For each category or groupings of categories specific plans should be made for the future timing of engagement activities, the engagement format and the information to be provided. As engagement occurs subsequent meetings will be arranged on the feedback received.

**Table 6.4: Stakeholder with Interest and Influence on the Project**

		Ability or Likelihood to Influence or Impact the Project		
		Low	Medium	High
Level of Interest in the Project	High		Tunisian Association for the Protection of Nature and the Environment (ATNPE) Tunisian Association for the Protection of the Environment and Archéological Sites (ATPESA)	Environment Ministry Ministry of Energy Ministry of Agriculture Community Leaders Land Owners
	Medium	General public	Markets (both formal and informal traders) Restaurants and Event Halls Shops and other businesses Other services	Civil Society Organizations, including ecological groups Press and Media
	Low		Police and traffic enforcers	



## 7. STAKEHOLDER ENGAGEMENT PROGRAM

### 7.1 General Considerations

Consultation, which is important when new power lines are to be constructed in a specific area, consists of a voluntary process of prior engagement with local institutions (regional and local administrations, park authorities, NGOs etc.) and the citizens of local communities directly affected by the works (P-AP). This process involves sharing the infrastructure development needs and likely impacts on stakeholders, a willingness to listen to opinions and concerns and the search for shared solutions regarding the positioning of new infrastructure or the reorganization of existing structures along with the minimisation of construction-related and operational impacts.

In the context of the Proposed Project, stakeholder and public consultation is a process consisting of essential steps that will be completed and improved throughout the Project cycle, in particular during the preparation of the ESIA, the RAP, obtaining land access prior to construction and addressing any ongoing issues identified through continued consultation or through the grievance management process.

The main objectives of the consultation process include informing stakeholders about the Project and its impacts (positive and negative) to enable them to articulate their points of views, concerns and values. This process will ensure greater transparency and accountability in decision-making regarding project design and implementation.

To this end, STEG and their consultants will organize public consultation meetings and events during the project preparation process, with emphasis on the ESIA and RAP reports in order to gather the views of the various stakeholders and the general public and to deal with them within the ESIA and the RAP in a way that is technically, socially and economically feasible. Table 7.1 outlines in generic terms the Project Cycle, the methods of consultation that should be employed along with the expected outcomes as consultation proceeds.

It is noted that whereas during November 2022 the Project is completing the draft ESIA, RPF and other key initial studies, stakeholder consultation has only just begun in Tunisia. The pace and intensity of consultation will thus have to accelerate rapidly over the coming months, during which the Project will be reviewed by the World Bank, to ensure stakeholders are informed of the ESIA and involved in the final route selection and impact mitigation planning process.

**Table 7.1: Consultation Through the Project Lifecycle**

Phase	Project Cycle	Method of Consultations and Information	Expected Output/Outcome
1	Project Preparation	Public consultations Written Project description / information handouts – addressing impacts, mitigations, benefits GRM introduced Small group meetings Pamphlets Facebook page Radio	<b>Output</b> i) Stakeholders identified and mapped - allowance for further additions or changes in SH prioritisation ii) Safeguards instruments (Environmental and social impact assessment [ESIA], Environmental and Social management Plan [ESMP] and resettlement Action Plan [RAP]) prepared timely, distributed and discussed with PAP and other stakeholders. iii) Project management contact information (eg CLO and on site contractor) shared with stakeholders. <b>iv) Grievance mechanism is prepared</b> <b>Outcome</b>

Phase	Project Cycle	Method of Consultations and Information	Expected Output/Outcome
			v) Awareness about project objectives raised among stakeholders through meetings and information documentation. vi) Project-affected parties (PAP) - as a priority- informed about project adverse impacts, mitigation measures and project benefits. vii) Awareness about project impacts raised among stakeholders, and consensus reached, about project benefits. viii) Public awareness raised, and project benefits understood. ix) Shareholders informed. Identify degree of support for the project. x) Stakeholders informed about GRM
2	Project Implementation	Public consultations Small group meetings, Pamphlets Facebook page Radio &TV	<b>Outcome</b> i) Safeguards instruments implemented in consensus. ii) PAP understand the mitigations of impacts effecting them and are not worse off, then before the project. iii) Grievances resolved amicably wherever possible but not restricting judicial options if needed, iv) Social risks reduced
3	Project Completion	Inauguration ceremony Pamphlets Facebook page Radio TV	<b>Output</b> i) Clients from the private sector, the public sector and households, are informed about and receive benefits of the project. <b>Outcome</b> ii) Clients are favourable to the project. iii) Safeguards instruments implemented successfully.

## 7.2 The Consultation and Participation Recommended Actions

In compliance with Tunisian regulatory requirements and ESS10, additional stakeholder engagement will be carried out, both in relation to the project as a whole and, once the final OHL route has been determined, in relation to physical and economic displacement. A key action in this respect will be to ensure ongoing stakeholder identification and mapping to inform the forward engagement process before construction.

In addition, once the details on project design and construction have been finalised, consultations will be held with representative authorities and agencies managing public utilities affected by the construction of the project, to define the best approach to reduce impact and risks.

Going forward, stakeholder engagement will emphasise information and communication, including actions to monitor the Project, the management of stakeholder expectations, explaining the objectives and mobilizing stakeholders through a participative, transparent and inclusive approach. This will allow for collecting and considering all opinions and suggestions in a constructive and realistic manner. Civil society will be provided information regarding the required stakeholder engagement and the content of the SEP. This will help reduce

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the exclusion risks mentioned by Article 32 of the Tunisian New Constitution on the right of access of the public to information and participation.

The potential impacts and mitigation actions identified during the ESIA process and the supporting technical studies, including the ESMP, will be integrated with the SEP information dissemination process and will be the structural basis of the information to be communicated and discussed with stakeholders. Similarly, after the identification of landowners and entities having the right to compensation due to land expropriation (if any), the Project sponsors will organize meetings with them to exchange information and identify their reactions. Proposals and suggestions will be registered, analysed and, when reasonable, included in the future of land acquisition and the RAP as necessary. Before its finalization, a workshop will be organized where the chosen actions will be presented to the stakeholder for discussion and validation.

In order to address the specific risks of sexual and gender based violence (SGBV), and sexual exploitation and abuse and sexual harassment (SEA/SH), the Project will engage with and carry out awareness raising among the affected labour and community population (especially vulnerable women and girls) on SEA/SH risks, informing them of their rights, how to report through the project GRM, the existing referral pathways and response support protocol for such incidents, as described in the SEA/SH Action Plan. Relatedly, the Project will map out available SEA/SH services (e.g. shelters, legal, financial and health support), especially in the wider project area (establish quality and capacity) and develop a referral pathways in project area. In support of this, engagement as needed will be carried out with existing service providers such as recognised Tunisian NGOs focused on SGBV and gender issues as well as relevant international agencies present in Tunisia (e.g. UNHCR, ILO, IOM, UNDP).

Engagement will be undertaken with local communities and farm workers to build understanding regarding the risks associated with the construction and operation of the OHL. Particular attention will be given to building understanding regarding the risks of agricultural and other activities and works in the vicinity of the OHL.

Activities involving the affected populations are summarized as follows:

- i) Expand the initial (ie 2021 consultations) awareness-raising, information and consultation campaign targeting affected populations, civil society representatives, concerned ministries and technical entities, as well as local and regional elected officials, focused on the Project, its local, regional, and national impacts and risks and recommended corrective measures;
- ii) Launch of an awareness-raising, information and consultation campaign targeting affected populations, civil society representatives, concerned ministries and technical entities, as well as local and regional elected officials, specifically focused on displacements, compensation, and other negative impacts, including temporary adverse effects during construction works. The topics include the procedures followed and stages involved; rights of Project Affected People; GRM; procedures for determining compensation amounts (unit prices; criteria, land requirements, and other subjects that may arise during the meetings);
- iii) Launch of an awareness-raising, information and consultation campaign targeting affected populations, civil society representatives, concerned ministries and technical entities, as well as local and regional elected officials, specifically focused on the environmental aspects, negative impacts and related mitigation measures;
- iv) Open houses for affected populations, civil society representatives, local elected officials, and concerned ministries and authorities. Briefing on the project and its progress; discussion of the “displacement and compensation” situation; exchanges of views on the environmental aspects; discussion of problems as experienced by affected persons and entities; and identification and discussion of solutions and suggestions and of the redress mechanism made available to affected persons and entities as part of the project. In all, three (3) open houses

						
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will be held during the project preparation period, starting with the launch of studies. STEG will listen, provide information and document participants' demands and follow-up requests. All stakeholders will be able to participate, depending on the topics and their availability (responsible ministry, local and regional authorities, donors). This measure is key to reaching vulnerable groups that may not have access to mass media and written information networks;

- v) One-on-one meetings will also take place particularly with the priority stakeholders. These will be based on both the needs of the project for information, permits, land access etc. and also on feedback received from stakeholders for more consultation.

These activities, intended for stakeholders directly affected by the project, will facilitate the process of becoming better acquainted with these stakeholders and their actual issues, problems and priorities and, more specifically, involve them in problem-solving. These activities facilitate learning from experience and making adjustments when feasible. They are supplemented with communication and information actions targeting the general public (e.g. via a Project website), the media and elected officials, to raise their awareness of the importance of the social and economic implications of the Project for the affected regions, and for Tunisia in general. It is recognised that while public communication tools (media) are important, they cannot be relied on to reach all stakeholders; thus, face-to-face engagement will continue to be necessary.

Specific communication materials will be prepared for the specific meetings and project phases. All communication materials can be provided directly to stakeholders during meetings or on request.

STEG or its consultants will be responsible for organising and managing consultation events. It will be assisted by a full-time E&S focal point at STEG. It will also participate in the ESIA and consultation validation process. The entity responsible for organising and conducting each meeting will be responsible for drafting and submitting minutes, in the week following the event, to STEG, with a copy to the oversight authority. The latter will ensure that its team participates regularly in these launches and meetings.

As indicated in the below action plan, detailed minutes containing the following information will be kept for each launch and each meeting:

- date and place of the meeting;
- nature and objective of the meeting;
- subjects addressed;
- number of participants and who they represent;
- problems raised;
- pending issues; and
- commitments made by STEG for further sections with particular stakeholders.

The engagement activities are grouped by topic in the following action plan. During consultations, all comments made by the public and concerned stakeholders can be forwarded to a dedicated address, in writing, by normal mail or by email, from the day the consultation process starts for about a month. Participants to those meetings are allowed to provide their requests and express their concerns. Requests for responses will be answered by mail or/and via email within two weeks

The aggregated questions and comments, together with the related answers, are published on STEG's website, while detailed minutes on the outcomes of the entire consultation, as well as on all questions, requests, suggestions, any other emerging issue, and a statistical analysis summary will be presented to the concerned parties that can contribute to the resolution of the issues at hand. From the STEG website, it will be also possible to access social media profiles on Facebook, Twitter and/or LinkedIn, which represent a growing opportunity for interaction for the company. Moreover, stakeholders who require clarifications or want to report an issue can contact the STEG Ethics Committee or the Audit Unit. Contact information (addresses, e-mail, and telephone numbers) can be found and is kept up to date on the website.

**Table 7.2: Action Plan for Implementation of the SEP<sup>5</sup>**

n	Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected output
1	<b>Consultations for finalization of the ESIA and the RAP</b>	Ongoing individual and group interviews, questionnaires and focus groups to address any additional potential impacts on communities due to the route, construction and operation of the project. RAP-related engagements, in line with the RPF/RAP, related to physical and economic displacement and related compensation measures	Affected communities, including, local and regional authorities, technical entities, particularly experts from key ministries (e.g. environment, energy, labor) for the ESIA, related agencies at national and governorate level and concerned NGOs	During the finalization of the ESIA and the RAP	As soon as the SEP is approved	Project areas in Tunisia	STEG or specialized contractor	ESIA and RAP with a detailed section on stakeholder participation
2	<b>ESIA and RAP consultation and validation workshops</b>	Individual and group consultations to present the ESIA and RAP results	Affected communities, including fishermen, local and regional authorities, technical entities, particularly experts from key ministries involved in the ESIA approval and concerned NGOs	Once	Between the last draft and the final report	Project areas	STEG or specialized contractor	ESIA and RAP: Finished products
3	<b>Consultations for preparation the construction phase</b>	Individual and group interviews, questionnaires and focus groups to address any issue on the communities of the construction and operation project's stages. Socialisation of the GRM	Representative authorities and the agencies managing public utilities interest by the project construction's activities and local communities	During the preparation the construction phase	Once the project has been approved	Project areas	STEG or specialized research firm	Detailed minutes, including recommendations and suggestions per meeting
4	<b>General awareness-raising campaigns</b>	Information meetings on the project, its objectives, risks and advantages and its implications Engagement with local stakeholders, especially agricultural workers and land users regarding health and	Affected population, including vulnerable persons, local and regional authorities, NGOs, technical entities, and resource persons	Once or twice before the launch of the technical studies and once or twice during the preparation period	To be determined once the project is approved	Head office of the concerned municipalities or any other place suitable.	STEG or any other institution recruited by STEG in collaboration with the focal points	Detailed minutes, including recommendations and suggestions per meeting

<sup>5</sup> Information and data will be gender disaggregated.





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n	Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected output
		safety aspects in respect of working in the vicinity of OHL as well as for infrastructure and road works in the vicinity of the underground cable						
5	<b>Information campaigns focused on land use, property and land purchase issues</b>	Information meeting on land use and real property issues and related implications: acquisition, compensation, procedures, redress mechanism.	Affected population, including vulnerable persons, local and regional authorities, NGOs, technical entities, and resource persons  The possibility of additional meetings with women	Once or twice before the launch of the technical studies and once or twice during the preparation period	To be determined once the project is approved	Head office of the concerned municipalities or any other place suitable	STEG or specialized entities recruited by STEG in collaboration with the focal points	Detailed minutes, including recommendations and suggestions per meeting and for each country
6	<b>Information campaigns focused on Environmental and related issues such as SEA/SH risks</b>	Information meetings on environmental and related issues (e.g. permanent and temporary impacts, risks, mitigation measures). Engagement with local communities to raise awareness of the risk of SEA/SH and relevant mitigations, including referral pathways for victims and available resources to support victims	Affected population, including Vulnerable persons, local and regional authorities, NGOs, technical entities, and resource persons	Once or twice before the launch of the technical studies and once or twice during the preparation period.	To be determined once the project is approved	Head office of the concerned municipalities or any other place suitable	STEG or specialized entities recruited by STEG in collaboration with the focal points and experts from the national environmental agency	Detailed minutes, including recommendations and suggestions per meeting and for each country
7	<b>Open houses</b>	Meetings, open discussions and compilation of complaints	Stakeholders and general public	Three half-day meetings: One at the start of preparation of the studies, one in the middle and one when preparation of the technical studies is concluded	To be determined once the project is approved	Head offices of the concerned municipalities	STEG	Detailed minutes
8	<b>One-on-one meetings with priority stakeholders</b>	Meetings to gather information on project, permits, land access etc. and also on feedback	Key stakeholders	Based on project needs	To be determined once the project is	Project areas in Tunisia	STEG or specialized entities recruited by STEG in	Detailed minutes, including recommendations and suggestions



    					
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n	Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected output
		received from stakeholders for more consultation.			approved		collaboration with the focal points and experts	per meeting and for each country
9	<b>Communications support</b>	Creation of a website providing up-to-date information in the progress of the project with a section reserved for questions and answers.	General public and stakeholders	Continuous	As soon as the SEP is approved	STEG website	STEG	Continually available information and exchanges

### 7.2.1 Communication materials

Specific communication materials will be prepared for the specific meetings and project phases. All the information will be provided in Arabic and will be available on the specific website, where an English version will be present.

The Design phase's communication materials will focus on the project's potential impacts and mitigations, the grievance mechanism and how to report comments or observations, the engagement activities' schedule and the timeline to present comments. For the meeting with the specific PAP group, the presentations will focus on the relevant area of the project as shown below.

**Table 7.3: Presentations' Topics for PAP Meetings**

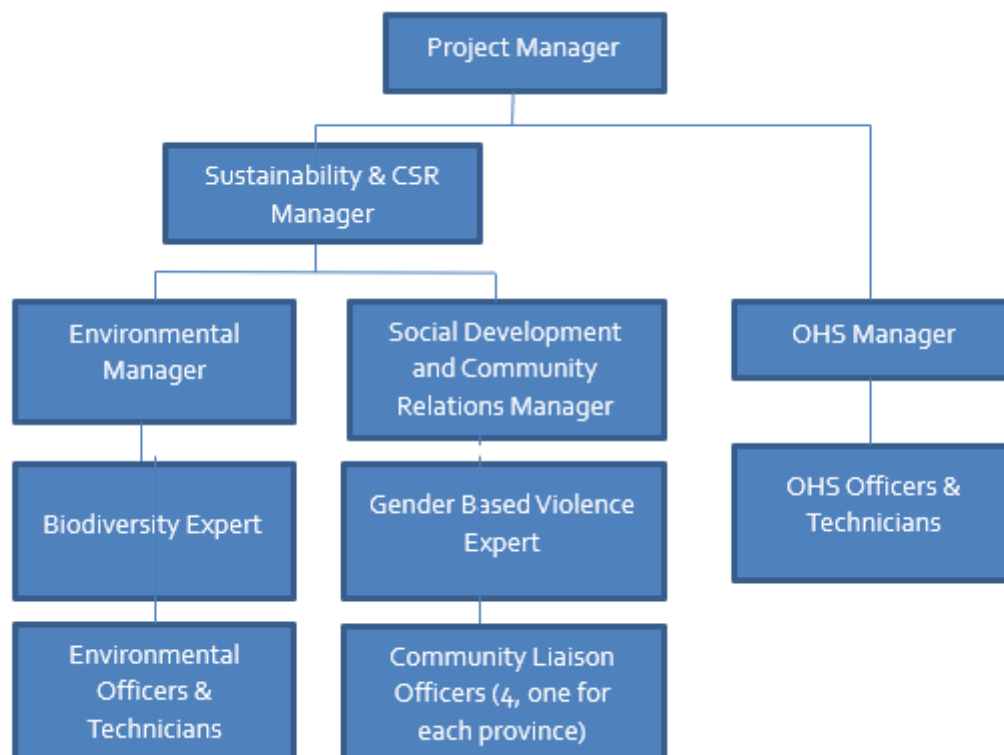
PAP group	Presentations' topics
Land users and/or property owner near the converter station	Converter station construction and potential impact on agricultural and livelihood activities due to project land take and loss of assets (e.g. olive or fruit trees), and timeframe of activities
Land users and/or property owners along the underground cable route	Underground cable construction, impact on the road and timeframe of activities
Property owners along OHL	OHL construction, impact on local agricultural and livelihood activities, including crop spraying, impacts on roads and traffic and timeframe of activities, compensation and livelihood restoration; and health and safety precautions regarding agricultural and other works in the vicinity of the OHL
Activities operating in Landfall area	Landfall construction, restrictions on local fishing activities and bathing, potential impact of project land take on existing agricultural and livelihood activities and loss of assets (e.g. olive or fruit trees), compensation and livelihood restoration, and timeframe of activities

The construction's communication material will present the construction activities, timeframe, mitigation of the impacts and grievance mechanism. They will be presented as flyers, totems in municipalities and informative panels nearby the construction areas.

The post-construction and operation phase's communication materials will focus on the timeline of the project, the purpose, nature, and scale of the project, management of the operational phase and mitigation of the impacts, activities carried out in the operation phase, grievance mechanism and further relevant information. This information will be provided as flyers, totems in municipalities and informative panels nearby the converter station and the landfall area.

## 8. ROLES, RESPONSIBILITIES AND RESOURCES

STEG will prepare an organisation to support the implementation of the SEP. This will specify the overall ownership/responsibility for the SEP and identify the SEP focal points in STEG. A starting point is STEG's overall organizational structure, with long-term assignment staff currently organised as follows:



In terms of the conduct of stakeholder engagement, STEG's current organisational structure provides for a Social Performance Manager, who is the direct point of contact for all social aspects, including stakeholder engagement; and the Community Liaison Officers (at least one for each of the four governorates), noting that the CLOs will be the direct point of contact for community / stakeholder issues. A specific organigram will be prepared as appropriate. This will address, inter alia, the following aspects:

- Management / coordination of the stakeholder database
- Delivery of benefits (Social Investment)
- Continued consultation role following the completion of construction
- Maintenance of the GRM
- Maintenance of STEG website.

It is noted that the construction contractor will be required to appoint an environmental and social manager, who will, inter alia, be responsible for:

- Mitigation and management of potential on-site environmental and social issues;
- Liaising with the STEG's ESPIU team regarding site visits and briefing sessions;
- Liaising with Sub-contractors regarding the ESMP requirements;
- Organising and maintaining briefing session records and mitigation and monitoring documentation;
- Responding to site inspection findings; and
- Receiving and responding to any complaints from external parties.

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The contractor CLOs, for their part, will rerequired to liaise with all relevant stakeholders and keep them informed about the Project during the construction phase, and provide feedback to the Project on stakeholder feedback and manage the contractor-specific GRM.

*Note: More detailed job descriptions will be prepared by STEG prior to contracting.*

## Resourcing

As set out in the ESMP, a provisional allowance of \$30,000 has been made for the preparation of the SEP execution-related documents and tools aimed at field staff tasked with implementing the SEP. The provisional budget for the implementation of the SEP throughout Project Development, Implementation and Operational Phases is estimated at \$ 120,000. A more precise budget will be prepared prior to contracting.

## Next Steps

In accordance with the ESMP, the following actions will be confirmed and undertaken going forward:

- Section 1.5 Development of execution plans for the CLOs and other persons involved in stakeholder engagement
- Section 3: Consultations with stakeholders in choosing the preferred route of the OHL, including with PAPs and vulnerable groups
- Section 3: Addressing the feedback obtained during the consultations carried out with stakeholders and incorporating this into the design of the Project
- Section 3: Provision of written responses to stakeholder concerns listed (see Annex 1) and the incorporation of these into the SEP Execution Plans and the provision of these responses as part of the next round of consultations
- Sections 6.2 and 6.4: The conduct of a stakeholder mapping exercise and the development of the Stakeholder Data Base
- Sections 6.2, 6.3 and 7.2: The need for ongoing stakeholder identification and mapping as part of the Execution Plans
- Section 7.2: The disclosure of this SEP to the public, as part of ongoing consultation activities and via the STEG website
- Section 7.2: The preparation and distribution to the public, local stakeholders and responsible parties of information documents about the project and the ESIA (including the non-technical summary of the ESIA)
- Table 7.2: To be converted into Execution Plan(s) with individual task assignments
- Table 7.2: The need to confirm that STEG will consult on finalising the ESIA and on the route selection
- Section 9: Finalising the GRM format, including the provision of contact details, phone, email and the publication, dissemination of and consultation on the GRM to local stakeholders and responsible parties
- Sections 9.6 and 9.7: The need to define an organisational chart indicating the responsible persons for implementing the GRM.

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## 9. GRIEVANCE REDRESS MECHANISM

### 9.1 Introduction

A grievance is a complaint or concern raised by individuals or organizations who judge that they have been adversely affected by the project during any stage of its development. Grievances may take the form of specific complaints for actual damages or injury, general concerns about project activities, incidents and impacts, or perceived impacts.

Complaints should be addressed promptly using an understandable and transparent process that is readily acceptable to all segments of affected stakeholders. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both the Project owner and stakeholders. The mechanism must not impede access to other judicial or administrative remedies. It is an attempt to resolve issues amicably.

The Grievance Mechanism provides a formal avenue for stakeholders to register concerns and for these to be addressed in good faith and through a transparent and impartial process. Grievances are monitored to signal any escalating conflicts or disputes.

This section details the proposed Grievance Mechanism that will be implemented in this project. It also proposes a specific means for its dissemination among the various stakeholders to ensure their awareness of its existence, content, and procedures.

### 9.2 Grievance Redress Mechanism

STEG will establish a GRM, the main objective of which is to facilitate the receipt, response to and resolution of external stakeholder concerns and complaints about the Project. The GRM can also be used by laborers working for the construction enterprises during the implementation phase, although the World Bank's ESF of requires a worker-specific GRM. Specifically, ESS2 requires that:

- The mechanism be accessible, unbiased and cost-effective;
- All grievances received in connection with the project must fall within the context of the project;
- The GRM established by the Project does not replace the complainants' option of accessing the judicial recourse but is a convenient mechanism for the resolution of project-related grievances;
- Issues raised in the consultations for project preparation need a response during the consultations and should not be deferred but mitigation will be provided in the safeguards documents or the project design. These are not complaints but opinions on anticipated impacts or issues with other projects, since this project is still under preparation;
- The GRM for labor is an essential component of the LMP and Contractor's ESMP;
- The SEP needs to have information about the contact points responsible for receiving complaints and responding to them along with the mechanism responsible to resolve issues. STEG contact points to receive complaints and respond to them are:
  - Office address
  - Office phone
  - Email address

For further reference, see Section 7 of the Labor Management Procedure.

### 9.3 Recording and Receiving Grievances

Grievances may be lodged by a variety of different means; oral (verbal, phone call), letter, e-mail, audio message, phone message, grievance box or others). The main uptake channels are as follows:

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- Address: STEG/Direction Centrale de l'Equipement (DCEQ), 38 Rue Kamel Ataturk 1080 Tunis
- Post Address: BP 190,1080 Tunis Cedex
- Email: dpssc@steg.com.tn
- Phone Number (DCEQ): +216 71 335 737
- Fax (DCEQ):+216 71 335 213
- Hotline number: 80 100 444

Registration of grievances will start during project preparation and continue through to completion. STEG will ensure that grievance boxes, for example, are located in non-conspicuous locations and that the process and mechanism of lodging grievances is meaningfully communicated to local stakeholders, including via the Project CLOs as part of the ongoing engagement process.

*Note: During the project preparation phase grievances in relation to the Proposed Project can be submitted to the Owner of the project, STEG.*

Grievances, concerns and suggestions can also be submitted directly by mail or by email to the same dedicated address during the Project life-cycle. They also can be made on the STEG website. In all instances, an initial acknowledgement will be given as soon as possible but no later than within two weeks.

## 9.4 Acknowledgement and Registration

Grievances that are forwarded to or made will be recorded on a standard Grievance Form. The name of the localities, the date recorded, the name of the complainant, and the name of the person who received the grievance are noted together with the proposed date for resolution. If the grievance is received directly by phone or verbally in a meeting, it will be recorded directly into the Grievance Form. Anonymous grievances will be recorded and investigated to the degree possible.

Once the grievance is recorded, the stakeholder will be provided with a copy of the Grievance Form signed by the complainant and by the staff member responsible. This copy serves as an acknowledgement that the grievance has been received.

## 9.5 Site Inspection

As necessary, STEG will organize a site inspection to check the validity and severity of the grievance. This inspection will be undertaken within seven days of receiving the complaint. The assigned individual will then work with other relevant members of the Project team to investigate the problem and identify measures to resolve the grievance as appropriate. This could involve the provision of information to clarify the situation and undertaking measures to remedy actual problems or compensate for any damage that has been caused.

In addition, specific problems to the project could then be dealt with during the advancement meetings at STEG on a regular basis, according to the nature of the complaint. When a grievance is found not to be a real problem, a clear explanation will be provided to the complainant.

During Implementation, grievances relating to project implementation can be submitted to the contractor, the supervision engineer, STEG. Each actor will follow the grievance procedures established above.

## 9.6 Response

A formal response detailing how the grievance has been resolved will be provided to each complainant within 30 days. When a resolution is delayed, the complainant will be provided with regular updates on progress. Following up with the complainant will be necessary to ensure that the matter is resolved and the complainant



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is satisfied. If grievance cannot be resolved to the satisfaction of both parties the responder and manager will offer a further meeting with the complainant.

## 9.7 Reporting on the GRM

The Project will prepare monthly reports on the implementation of GRM for the Project. In addition, periodic reports on the GRM implementation will be included in the periodic reporting to the funding agencies. The reports will provide an overview of grievances, directly or indirectly related to the project implementation. Additional information will include:

- Nature of the grievances;
- Available information on the complainants (including demographic – student, parent, gender, etc.);
- Information on where the grievances were received and in what format;
- Information on the status of the grievances (resolved, under review, etc.);
- Information on how grievances were resolved; and
- Information on unresolved grievances and why they are not yet resolved.

The reports may also include recommendations for improving the GRM or project design. These recommendations should be based on the monitoring of the GRM, specifically its functionality and the types of grievances that have emerged. To this end, STEG will nominate a dedicated and well-trained person to be in charge of monitoring the GRM.

## 9.8 Awareness Raising of the GRM

Information about the GRM will be disseminated in a simple 'brochure' written in Arabic for Tunisia and made available and explained to stakeholders during consultation meetings and upon request. The GRM should be accessible to vulnerable peoples including illiterate or disabled through company (eg CLO) support in completing the grievance submission. The brochure will contain two sections:

- Section One: Project objective (three paragraphs):
  - (i) one paragraph describing the overall aim of the project,
  - (ii) one paragraph on the components(s) requiring land purchases and those causing environmental and social problems other than land purchases, and
  - (iii) one paragraph on the purpose of the brochure (publicize the GRM and provide a brief overview of the project).
- Section Two: Description of the proposed GRM, covering in one or two pages the following points:
  - Who the stakeholders are (including SEA/SH);
  - What their rights of redress are under the GRM and through what avenues;
  - Who stakeholders should contact locally and at the project unit level, if necessary (hence the necessity of appointing a STEG and SEP focal point), including name, email address, telephone number and any other useful information; and
  - Description of the tasks and responsibilities of the focal point, including the responsibility and obligation to respond in writing within a period of two weeks.

Finally, the brochure will indicate that the focal point must necessarily write a narrative report whenever a grievance is filed, indicating the nature and date of the grievance and the solution adopted, addressed to the project agencies (STEG), with a copy to the project manager at the World Bank.

## 9.9 GRM to address SEA/SH grievances

In accordance with the SEA/SH Action Plan (Section 6), the project GRM will be strengthened to make it responsive to SEA/SH. The Project will set up the GRM based on local resources and mechanisms on SEA/SH response and the WB guiding model. Under this model, SEA/SH allegations can be reported, like

    			
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any other project-related grievance, using multiple channels, including the regular project-level GRM channel. Specific procedures for SEA/SH, including confidential reporting with safe and ethical documenting of SEA/SH cases will be prepared, outside the project GRM channels, especially to address high risk situations.

					
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## 10. MONITORING AND REPORTING

### 10.1 Involvement of Stakeholders in Monitoring Activities

The ELMED project provides several opportunities to stakeholders, especially Project-Affected Peoples (PAP), to monitor certain aspects of Project performance and provide feedback. The Grievance Resolution Mechanism will allow PAP to submit grievances and other types of feedback. Citizen/PAP and OIP meetings at the project stages will also allow PAP and OIP to provide feedback on project performance concerns and observations.

### 10.2 Reporting Back to Stakeholder Group

Reporting to stakeholder groups and evaluating the stakeholder process is considered vital to ensure that STEG point of contact can respond to identified issues and change the schedule and nature of engagement activities to make them more effective. It is desirable that all issues must be resolved at all levels and professionally. For a clear and understandable review, everything should be used as informational and in the form of presentation. All interested parties should be informed of all stages and the solution to all problems.

STEG representative will report back to PAP and OIP through public meetings. Feedback received through the GRM will be responded to in writing and verbally, to the extent possible. SMS' and phone calls will be used to respond to stakeholders whose telephone numbers are available.

The website will be used to present and make available public meeting minutes and responses to stakeholders' concerns and observations. Social media (primarily through the Project website (or social media platform) for P-AP and other stakeholders) will also be used to report back to different stakeholders.

## ANNEX 1 - RECORD OF STAKEHOLDER ENGAGEMENT ACTIVITIES

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
8 June 2021	Governorate of Nabeul <ul style="list-style-type: none"> <li>Local Authorities</li> <li>Governor</li> </ul>	ELMED IDEA		<p>Local authorities and administration expressed their concerns regarding the project, notably as regards:</p> <ul style="list-style-type: none"> <li>The need to present the plans and technical data of the Project to the competent authorities before the start of the works in order to obtain the necessary authorisations/permits;</li> <li>The consultants in charge of the technical and environmental studies must consult the local and regional authorities, in particular: the Regional Directorate for Equipment and Housing, the Coastal Protection and Planning Agency and any other service deemed important for the realization of the Project;</li> <li>Presentation of a technical file of the boat to be used by the marine consultant with the characteristics of the equipment to be used during the investigation work on the submarine cable;</li> <li>The possibility of creating a management unit at the regional level to ensure the progress of the studies and the realization of the Project; this unit could be chaired by the Delegate of Menzel Temime (location of the Mlaâbi conversion station and the underground cable).</li> </ul>
12 August 2021	Local authorities, representative of Menzel Temime, local sectoral Chiefs (Omdas) and community representatives	IDEA	Menzel Temime	<p>To discuss the route of the underground cable in the Menzel Temime area (see Map 1), from the landfall of the cable to the converter station, specifically the two landfall options on the table. Key points on options are as follows:</p> <p><b>Kélibia Landing Site (Option 1):</b></p> <ul style="list-style-type: none"> <li>No constraints for the rural section of the underground cable</li> <li>Problems in urban part of Menzel Temime: works envisaged will have a significant impact on the existing infrastructure, street furniture, economic activities and traffic.</li> <li>It would be better to avoid the urban center of Menzel Temime to avoid this problem. The Urban Development Plan of Menzel Temime includes a planned ring road which could be a solution for laying the cable between the underwater part and the Mlaâbi converter station. This option will avoid residential areas. However, the planned ring road is unlikely to be built before 2027 at the earliest.</li> </ul> <p><b>Sidi Jameledine Landing Site (Option 2)</b></p> <ul style="list-style-type: none"> <li>No specific environmental constraints to report for this variant.</li> <li>The width of the track leading from the landing point to the RR27 and the roads RR27 and RR45 is sufficient and does not pose any access problem.</li> <li>Like variant 1, the Sidi Jameledine option crosses the urban area of Menzel Temime and Sidi Jameledine and the installation work will have a significant impact on these two agglomerations (traffic disruption, damage to street furniture, contamination, etc.).</li> <li>It would be appropriate to modify the route of this variant is to follow the existing tracks outside the urban areas mentioned. The planned ring road option (described in the Urban Plan) is also possible for variant 2.</li> </ul> <p><b>Menzel Horr Landing Site (Option 3)</b></p> <ul style="list-style-type: none"> <li>Presence of a RAMSAR site (No. 1707) on the cable crossing line (at the level of the landing point).</li> <li>The urban part affected by the passage of the cable is the largest among the three variants proposed. This option will cause more damage to existing homes and infrastructure and disrupt traffic in the town of Menzel Horr and Menzel Temime.</li> <li>This option seems to be the most restrictive from a terrestrial point of view, the variant passes through two very populated agglomerations and the costs related to the compensation of people affected by the works during the construction phase may amount to very high sums. It would be preferable to avoid the urban task of the two cities in</li> </ul>

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
				<p>question by following the tracks that are outside the agglomeration or the planned ring road (proposed in the Plan d'Aménagement et d'Urbanisme PAU de Menzel Temime).</p> <p><b>Mlaâbi Converter Station</b></p> <ul style="list-style-type: none"> <li>Presence of the Mlaâbi dam: environmental constraint given the importance of this site for migratory birds (IBA site).</li> <li>We must not forget another important impact on birds of all Ramsar-classified ecosystems, which risk flying over the station and the HV overhead lines. This is data to be taken into consideration by the appropriate measures in the ESIA.</li> <li>A potential risk of pollution for Oued Tafekhsite</li> <li>Absence of another alternative for setting up this station.</li> <li>The AFI has still not started development work on the industrial zone in question (creation procedure launched or not yet??).</li> <li>The project will have an impact on the agricultural activity practiced with the need to put in place compensation or compensation measures for the people affected.</li> </ul>
30 November 2021	Delegation of Grombalia, Town hall of Grombalia and its technical services, Town Hall of Fondouk Jedidi, Head of sector/Imada Grombalia Est, Head of sector/Imada Niano, Head of sector/Imada Chammes, directorate of equipment and housing, representative of SONEDE, representative of STEG, agricultural services).	IDEA	Délégation de Grombalia	<ul style="list-style-type: none"> <li>For the administrations it is necessary to target state lands (public) to install this new project. This approach will make it possible to reduce/avoid conflicts with the populations in the event of passage on private land.</li> <li>The route proposed by STEG for the 400 kV HV line is outside the area covered by the urban development plan of the municipality of Grombalia. The representatives of the town hall recommended the passage through state lands in order to reduce the impact of the line on private properties and to avoid conflicts with local populations, in particular in areas of arboriculture.</li> <li>The representative of the equipment management thinks that it is more appropriate to propose an underground cable instead of an aerial component. A buried alternative following the existing roads: the C43 road linking Menzel Temime to Menzel Bouzelfa and then the one leading to Borj Cedria. According to him, this alternative will minimize the impact on the landscape and the damage to private properties (agricultural land); an idea not shared by the STEG services which justify their choice (overhead line) by the high costs associated with the installation of an underground cable.</li> <li>Fondouk Jedidi town hall: the municipal area encompasses 3 sectors or imadas (Fondouk Jedidi, Khanguet El Hoje and Chammes). The area of Khanguet El Hoje is dominated by state land (belonging to the state) unlike Chammes where the majority of land belongs to individuals (private land). According to the town hall and heads of sectors, the proposed OHL will cause more problems in the Chammes area.</li> </ul>
29 November 2021		IDEA	Délégation de Menzel Bouzelfa	<ul style="list-style-type: none"> <li>According to the representatives of the delegation, the southern part of the delegation (ERRAHMA) is dominated by land owned by the State (state land) but illegally occupied by farmers (field crops: cereals).</li> <li>As for the bordering area with Beni Khalled (AITHA): arboriculture is the main occupation (citrus and olive groves) with several orchards and irrigated perimeters (having a status of safeguard and protection by Tunisian law). The lands in this part of the delegation are mostly private lands.</li> <li>According to the delegate, the social impact of the HT line will be greater in the second part of the delegation (bordering with Beni Khalled) than in the southern part (Errahma) because of the land. Farmers located in the border area with Beni Khalled often ask to be compensated differently by claiming new land equivalent to that impacted by the project instead of receiving a sum of money.</li> </ul>

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
1 December 2021	Local Authorities of the Délégation d'El Mida (Representatives, Maire's Office, Heads of Services of d'El Mida and Oum Dhoul).	IDEA	Délégation d'EL MIDA	<ul style="list-style-type: none"> <li>The delegation comprises six sectors or imadas and a single commune (El Mida). The total population of El Mida is 28,000 with approximately 8,000 households.</li> <li>The main activities: agriculture (rainfed cereals, livestock) with some industries (textiles and agri-food).</li> <li>The proposed route of the line is outside the area covered by the urban development plan of the municipality of El Mida and crosses agricultural land (rainfed cereals).</li> <li>The authorities request the consultation of the populations who will be impacted by the Project and to define an indemnity and compensation process that meets their expectations.</li> <li>In order to guarantee the acceptability of the project by the local populations, the representatives of the town hall asked for the improvement of the existing electricity network (transition to the three-phase system).</li> </ul>
10 December 2021	Representatives of Beni Khalled including: <ul style="list-style-type: none"> <li>Maire's Office,</li> <li>Maire's office of Zaouiet Jedidi</li> <li>Sectoral Chiefs of Beni Khalled, Sidi Toumi and Kobba Kebira</li> <li>Local Infrastructure and Habitat Services</li> <li>Agricultural Services Water Distribution Services (SONEDE)</li> <li>STEG</li> <li>Sanitation Services "ONAS"</li> </ul>		Délégation de Beni Khalled Délégation de Zaouiet Jedidi	<p>The delegation of Beni Khalled is made up of two municipalities: Beni Khalled and Zaouiet Jedidi.</p> <ul style="list-style-type: none"> <li>Stakeholders have expressed some concerns about the implementation of the Project according to the configuration proposed in the delegation of Beni Khalled:</li> <li>Towards the southern part of the delegation, the town hall of Beni Khalled plans to develop an industrial zone and a residential subdivision (procedures in progress according to the town hall) over 50 ha and the 400 kV overhead line risks having a negative impact on the completion of the this project. They ask to move the route to the northern part of the delegation or even go directly through the delegation of Soliman. This point was widely discussed between the STEG services and the mayor, each party defended its project (residential development vs 400 kV power line).</li> <li>The main concern of the town hall is to protect homes (populations) and agricultural land (citrus orchards).</li> <li>Representative of CRDA (agricultural services): according to him, the indemnification/compensation procedure practiced by STEG for electricity transmission lines does not meet the expectations of populations and farmers. They consider that the sum granted to the affected people (270 Tunisian dinars or about 85 euros for each pylon installed).</li> <li>The Beni Khalled area is crossed by a HT line (90 kV), this line since its installation has blocked the phytosanitary treatment operations, applied by plane, from the northern part of the region (Soliman). Citrus orchards located behind the line (southern part of Beni Khalled) are no longer treated automatically (by plane) but manually by supplying phytosanitary products to farmers to apply them directly to the trees. According to the agricultural services, the manual treatment did not achieve the expected results. The installation of a new HV line, along the route proposed by STEG, risks aggravating the situation by depriving other orchards of the aerial spraying operations of phytosanitary products. Given this, they recommend making changes to the preliminary route by placing it further south behind the existing line.</li> </ul>
10 December 2021		IDEA	Délégation de Korba	<ul style="list-style-type: none"> <li>Urban planning and passage of the overhead line in the delegation (towards the Beni Ayech area, northern limit of the delegation): the municipality of Korba has an urban development plan and the municipal area currently covers 18,436 ha. The sector/Imada of Beni Ayech (administrative division in Tunisia, the country is divided into governorates, each governorate is divided into delegations, which are in turn divided into sectors or imada), has a very old and not updated development plan (only available in paper format).</li> <li>The people met, in particular from the town hall of Korba, mentioned the problems encountered during the construction of the trans-med project (gas pipeline) between Algeria and Italy. c</li> <li>The area/sector of Beni Ayech is an agricultural area and the populations cultivate annual crops.</li> <li>A recommendation expressed by the delegation and shared by the town hall is the improvement of electrification in the Beni Ayech area. According to the delegation, this area is</li> </ul>



Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
				poorly served by electricity with many cuts, especially in summer. Improving household electrification (switching to the three-phase system) could ensure the acceptability of the Project among local populations.
30 December 2021	Local authorities of Kélibia (Representatives of the Maire's Office)	IDEA	Délégation de Kélibia	<ul style="list-style-type: none"> <li>The main activities present in the delegation: fishing, agriculture (arboriculture and cereal growing), tourism, industry, etc.</li> <li>The industrial zone of Menzel Yahia houses certain industrial units (packaging of sardines, tobacco, etc.).</li> <li>The area chosen for the landing is located outside the area covered by the urban development plan of Kélibia but inside the plan of the industrial zone of Menzel Yahia.</li> <li>The Delegate of Kélibia pointed out that the site chosen by ELMED for the landing of the submarine cable (near the industrial zone of Menzel Yahia) is an area which could contain certain archaeological and historical monuments. He asks that STEG/ELMED must consult the competent administrations, in particular the National Heritage Institute (INP), and recommends carrying out investigations in order to ensure that the project will have no impact on heritage. culture of the area. This information was transmitted to ELMED (meetings were organized between the INP, ELMED and IDEACONSULT and georadar investigations have since been conducted by the Technical Consultant COLENCO, the results of which are available in the archaeological study).</li> <li>The representatives of the commune of Kélibia recommended that the impact of the project on the port of Kélibia, on the wetlands of the region and on the avifauna be carefully studied, in particular for the aerial component (although this part is not does not directly impact delegation).</li> </ul>
19 October 2022	Governorate of Manouba Governor General Secretary Manouba's Governorate Delegate of Mornaguia Maire of Bassatine Maire of Mornaguia Head of District STEG (Manouba) Regional Director (Ministry of Equipment) Representatives of the Regional Directorate of: Agricultural development State Domains Ministry of Energy	ELMED	Governorate of Manouba	<p>The local and regional authorities and the regional administration have expressed comments and recommendations on the project, including:</p> <ul style="list-style-type: none"> <li>The project is very important for Tunisia, as it will strengthen the national electricity network in a challenging global energy context.</li> <li>The local and regional authorities will support the implementation of the project by facilitating administrative procedures and obtaining the necessary permits;</li> <li>The need to present the technical details of the Project components to the competent authorities at local and regional Levels;</li> <li>The main stakeholders must be consulted by the consultants in charge of the technical and environmental studies;</li> <li>In order to reduce/avoid possible conflicts with local communities and individuals, it will better target "State Owned Land"</li> </ul>
22 February 2023	Governor, Delegates, Ministry of National Defense, Maritime Guard of Kelibia, General Directorate of Forestry (DGF), Industrial Land Agency (AFI), National Environmental Protection Agency (ANPE), Coastal Protection and Development Agency (APAL), Industry Promotion	ELMED/STEG, IDEACONSULT	Governorate of Nabeul	<p><b>Stakeholders' interventions</b></p> <p>Representative of the Regional Directorate of Equipment: STEG has been given the necessary authorisations to carry out the necessary studies. A copy of the project route must be provided before the start of the works.</p> <p>Representative of the General Directorate of Forestry: The project's route crosses private and public forest areas, which requires the necessary licences to be obtained before work starts. STEG could create an application for all petitions and a follow-up to avoid any disruption of the project. A meeting between STEG and the GD of forestry could be organized.</p> <p>Representative of the Coastal Protection and Development Agency (APAL): The project concerns, in part, the public maritime domain, which makes it necessary to sign a concession between the ministries of energy and environment, which requires a financial, technical and environmental feasibility study.</p>

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
	Agency (API), Regional Directorate of Equipment (DREH), Regional Commissariat for Agricultural Development (CRDA), Regional Development Directorate (DDR), Regional Delegation of State domain and land affairs, State Lands Board (OTD), Tunisian Union of Agriculture and Fisheries (UTAP), Civil protection,			<p>Representative of the Ministry of National Defense: He highlighted the need to respect the data confidentiality, to provide the Ministry with the geophysical study carried out, and to mark the project route on national and international maps.</p> <p>Representative of the Industrial Land Agency (AFI): he noted the need to coordinate with AFI before the creation of a junction chamber in the industrial zone of Sidi Yahya in Kelibia, and to provide STEG's network requirements (water, sanitation, telecommunications, etc.) to be taken into account in the development studies for the industrial zone.</p> <p>Representative of the Maritime Guard of Kelibia: The decree n° 1836 of 1997 of 15 September 1997 must be respected. A coordination with the Naval Guard services is required when using the vessels during the project implementation stages. Comments from the representatives of ELMED ETUDES</p> <p>Coordination has been made with all the ministries concerned STEG will contact all the services concerned to obtain the necessary authorisations. For the maritime line, a call for tender will be prepared with specialised international companies.</p> <p>Concerning the underground cable, a route will be followed along the roads, with the commitment to restore the situation to what it was after the completion of the works.</p> <p>A meeting will be scheduled with representatives of the Ministry of Defence and APAL in order to provide further clarification and to adjust the procedures.</p> <p><b>Governor's recommendations</b></p> <ul style="list-style-type: none"> <li>The regional authority supports the efforts of all parties to facilitate the timely launch of the works</li> <li>The need to comply with the necessary arrangements with all stakeholders to avoid any delay.</li> <li>Carry out field visits to the selected roads in coordination with the relevant departments</li> <li>The need to provide all concerned services with the necessary documents and data before the launch of the project.</li> <li>The need to establish local committees under the supervision of the delegates to solve the various problems that may be raised by the citizens concerned by the progress of the project.</li> </ul>
24 February 2023	Governor, Delegates, Regional Directorate of Environment, Regional Commissariat for Agricultural Development (CRDA), Regional Development Directorate (DDR), Regional Delegation of State domain and land affairs, Water exploitation and distribution company (SONEDE), Tunisie Telecom,	ELMED/STEG, IDEACONSULT	Governorate of Zaghuan	<p><b>Stakeholders' interventions</b></p> <ul style="list-style-type: none"> <li>Representative Regional Directorate of State Domains and Land Affairs: He underlined the need for coordination with the central and regional services of the Ministry as the aerial route crosses a lot of state-owned land, and to carry out authorization operations for the construction of pylons and lines. In order to evaluate the required compensation, tests must be carried out by agricultural forensic experts.</li> <li>Representative of Water exploitation and distribution company (SONEDE - Zaghuan): She wondered whether the increase in the production capacity of the Mornaguia power plant and the gas turbines had been taken into account</li> <li>Representative of the Regional Commissariat for Agricultural Development (Water Department): He questioned the extent of the impact of the power line on the farm and stressed the need to carry out the necessary tests and to highlight the percentage of this impact, even if it is low or lower than what has been determined by the World Health Organisation (WHO).</li> <li>Representative of the regional telecommunications services: He asked about the impact of the electromagnetic field on the health of the local population.</li> </ul>

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
				<p><b>Comments from the representatives of ELMED ETUDES</b></p> <ul style="list-style-type: none"> <li>The construction of the pylons will occupy an area of about 200 m2 so the land remains for its owner. However, the files will be studied on a case-by-case basis and tests related to the erection of the pylons and the passage of the power lines will be carried out.</li> <li>04 studies have been prepared, including the study of the consolidation of the network, which took into account these data mentioned, so that we can achieve exchanges between networks in an optimal way. He also pointed out the existence of an ambitious programme within the framework of the country's strategy for the export of electrical energy to Italy. This programme is known as 30-30-30, planned for the year 2030, with 30% of energy production from renewable energy sources, and 30% reduction of carbon emissions.</li> <li>STEG has been asked about the impact of electromagnetic fields for similar projects in other regions and the results of the measurements carried out have shown that the effect is insignificant.</li> </ul> <p><b>Governor's recommendations</b> He stressed the need to coordinate with the various public actors and to make a concerted effort to overcome difficulties, particularly those relating to land, while ensuring that the administrative steps are taken to ensure that the project is launched on time.</p>
28 February 2023	Governor, Delegates, Municipalities, Industrial Land Agency (AFI), National Environmental Protection Agency (ANPE), National Heritage Institute (INP), National Sanitation Office (ONAS), Agricultural Investment Promotion Agency (APIA), Regional Commissariat for Agricultural Development (CRDA), Regional Development Directorate (DDR), Regional Delegation of State domain and land affairs, regional office of consumer protection, Regional Directorate of Social Affairs, Regional Women's Commissariat, Regional Directorate of Employment,	ELMED/STEG, IDEACONSULT	Governorate of Manouba	<p><b>Stakeholders' interventions</b></p> <ul style="list-style-type: none"> <li>Representative of the regional administration of the State domains: She requested to have the necessary documents (plans, certificates of ownership of agricultural land) so that her services can determine the land titles and the status of the farmers, which will avoid all obstacles during the construction phase.</li> <li>The representative of the Regional Commissariat for Agricultural Development: She indicated the need to provide the technical files and plans of the agricultural land that may be affected by the project. This will avoid problems related to the irrigation canals. She asked to involve the CRDA services during the field visits.</li> <li>The representative of the National Heritage Institute (INP): She asked to involve the services of the INP during the field visits in order to enable them to understand the route.</li> <li>The Mayor of Borj El Amri mentioned the repeated interruption of electricity in the delegation of Borj El Amri and asked to study the possibility of reinforcing the delegation's network in the framework of the project.</li> <li>The president of the regional office of consumer protection in Manouba called for the intensification of the awareness and information campaign on this project.</li> </ul> <p><b>Comments from the representatives of ELMED ETUDES</b></p> <ul style="list-style-type: none"> <li>Project representatives have committed to providing the necessary documents to the various stakeholders and to involve them in the field visits.</li> <li>Concerning the repeated interruption of electricity in Borj El Amri: STEG is in the process of reinforcing the network, notably at the level of the El Fejja station, and consequently the region will no longer experience interruptions in electricity as of June 2023.</li> </ul> <p><b>Governor's recommendations</b> He stressed the strategic importance of the project, its involvement in strengthening the national network and the need for local authorities to support its implementation.</p>
22 March 2023	Governor, Delegate, Municipalities, National Environmental Protection Agency	ELMED/STEG, IDEACONSULT	Governorate of Ben Arous	<p><b>Stakeholders' interventions</b></p> <ul style="list-style-type: none"> <li>The Delegate of Mohammedia insisted on the need to extend the project to the delegation of Mohammedia, stressing that it will be a support to its success.</li> </ul>

Date	Stakeholder(s)	Project Representatives	Location	Issues Raised
	(ANPE), National Sanitation Office (ONAS), Regional Directorate of Equipment (DREH), Regional Commissariat for Agricultural Development (CRDA), Regional Delegation of State domain and land affairs, Regional Union of Agriculture and Fisheries, Technical Service of the municipality of Mornag, NGO "Amal", Water exploitation and distribution company (SONEDE), Tunisie telecom,			<ul style="list-style-type: none"> <li>○ The Representative of the Regional Directorate of Equipment suggested prior coordination to designate interventions on the public road domain.</li> <li>○ The representative of the Regional services of State Domains called for providing the necessary technical documents and creating a regional working group to identify owners and estimate easement needs.</li> <li>○ The representative of the Regional Commissariat for Agricultural Development insisted on the need to obtain all authorizations and take the necessary precautions to preserve migratory birds and avoid fires.</li> <li>○ The representative of the Technical Service of the municipality of Mornag insisted on avoiding the project's negative impacts on the populations.</li> <li>○ The President of the Regional Union of Agriculture and Fisheries noted that farmers are suffering from the pressure of projects that cross the irrigated perimeters. They are unable to develop their activities for fear that their land will be affected. He asked to take this aspect into account and to move away as much as possible from the irrigated perimeters.</li> <li>○ The representative of the local civil society (NGO "Amal") asked to carry out preliminary consultations with agricultural lands' owners, which will be included in the project.</li> </ul> <p><b>Comments from the representatives of ELMED ETUDES</b> Project officials have indicated that all stakeholder recommendations are, or will be, taken into account.</p> <p><b>Governor's recommendations</b> He recommended the need for coordination between the various central and regional administrations involved in the implementation of this project, in order to avoid possible delays in its implementation.</p>

## ANNEX 2 - IDENTIFIED RISKS AND IMPACTS THROUGH CONSULTATION

Need	Risk
Information on project plans to authorities	<ul style="list-style-type: none"> <li>• Delay in approvals</li> <li>• Lack of awareness of project needs and services from authorities</li> <li>•</li> </ul>
Information on subsea operations	<ul style="list-style-type: none"> <li>• Lack of awareness of authorities</li> <li>• Impact on by ELMED for the landing of the submarine cable is archaeological and historical monuments. (near the industrial zone of Menzel Yahia)</li> <li>• Risk of lack of studies into heritage. culture of the area.</li> <li>• Lack of studies on the port of Kélibia, on the wetlands of the region and on the avifauna</li> </ul>
Information on underground cable	<ul style="list-style-type: none"> <li>• Low concern in rural areas</li> <li>• Significant impact on existing infrastructure, roads, traffic and economic activities</li> <li>• Minimize impacts of Option 2 with Menzel Temime planned ring road which (2027) between the underwater part and the Mlaâbi converter station or routing around communities</li> <li>• Option 3 will impact Menzel Horr Landing Site Presence of a RAMSAR site</li> </ul>
Converter Station	<ul style="list-style-type: none"> <li>• Presence of the Mlaâbi dam: environmental constraint given the importance of this site for migratory birds (IBA site).</li> <li>• Impact on birds of all Ramsar-classified ecosystems, which risk flying over the station and the HV overhead lines.</li> <li>• Risk of pollution for Oued Tafekhsite</li> <li>• Lack of of an alternative for setting up this station.</li> <li>• Impact on the agricultural activity practiced with the need to put in place compensation or compensation measures for the people affected.</li> </ul>
Power Lines	<ul style="list-style-type: none"> <li>• Conflict conflicts with the populations in the event of passage on private land, in particular in areas of arboriculture. Minimize impacts on private lands by using lands (public) to install this new project.</li> <li>• Impact on existing homes</li> <li>• The OHL will have more impact than a totally UG cable. Minimize the impact on the landscape and the damage to private properties (agricultural land)</li> <li>• The OHL will have impacts on municipal and built up areas – potential for conflict</li> <li>• Potential conflict on state land illegally occupied by farmers (field crops: cereals) .</li> <li>• Impact on arboriculture (citrus and olive groves) with orchards and irrigated perimeters (having a status of safeguard and protection by Tunisian law). The lands in this part of the delegation (Menzel Bouzelfa) are mostly private lands.</li> <li>• Impact of power lines on aerial spraying</li> <li>• Risk of conflict due to social impact of the OHL in Beni Khalled on the land. Farmers often ask to be compensated differently by claiming new land equivalent to that impacted by the project instead of receiving a sum of money.</li> <li>• Impact of power line on development of industrial zone in Beni Khalled</li> <li>• In adequate indemnification program practiced by STEG for electricity transmission lines does not meet the expectations of populations and farmers.</li> </ul>

	<ul style="list-style-type: none"><li>• Past compensation programs (eg Trans Med pipeline) have been inadequate</li></ul>
Consultation	<ul style="list-style-type: none"><li>• Inadequate consultation with the populations who will be impacted by the Project to define an indemnity and compensation process that meets their expectations.</li><li>•</li></ul>
Benefits	<ul style="list-style-type: none"><li>• Risk of acceptance by the local populations, due to lack of local benefit - the improvement of the existing electricity network (transition to the three-phase system).</li><li>• Need for improved electrification delivery and in house services</li></ul>



## ANNEX 3: MEETING WITH NGOS

The Consultant carried out a meeting with institutions and NGOs active in the field of the environment to present the conclusions of the Environmental and Social Impact Assessment (ESIA) and the draft Biodiversity Management Plan (BMP) and to consult them on the ELMED Project. The meeting was held on 22 March 2023, at STEG's head office.

### Photos of the meeting



### List of participants

Lieu : Siège Social de la STEG (38, rue Kamel Atatürk – Tunis)

Date : Mercredi 22 Mars 2023

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