THE REPUBLIC OF TUNISIA

<u>Tunisia-Italy Electricity Integration and</u> <u>Renewable Energy Ecosystem</u> Project <u>(P179240)</u>

NEGOTIATION DRAFT

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

April 28, 2023

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Confidential

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Tunisian Company of Electricity and Gas (Société Tunisienne de l'Electricité et du Gaz (STEG) (the Borrower), under the tutelage of the Ministry of Industry, Energy & Mines, will implement the Tunisia-Italy Electricity Integration Project (P179240), (the Project), as set out in the IBRD Loan Agreement and the GCF Financing Agreement with STEG, except for Subcomponent 3.3, which will be implemented by the Republic of Tunisia through a Project implementation unit (PIU) under the Ministry of Higher Education and Scientific Research (MESRS) as set out in the IBRD Loan Agreement and the GCF Financing Agreement with the IBRD Loan Agreement and the GCF Financing Agreement with the Republic of Tunisia. The International Bank for Reconstruction and Development (Bank) has agreed to provide financing for the Project, "Tunisia-Italy Electricity Integration and Renewable Energy Ecosystems Project (P179240)" as set out in the referred agreements.
- 2. The Borrower shall ensure that the Project and its Associated Facilities (namely the submarine cable in Tunisian waters) is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the IBRD Loan Agreement and GCF Financing Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
- 3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project and its Associated Facilities, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
- 4. As agreed by the Bank and the Borrower(s), this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower, STEG, under the tutelage of the Ministry of Industry, Energy & Mines (except for Component 3.3. that will be implemented by the MESRS) and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the STEG and MESRS for component 3.3.

MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MON	IITORING AND REPORTING	•	
A	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project and its Associated Facilities, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s), including but not limited to grievance logs.	Three months after the Effective Date, and thereafter throughout the Project implementation.	STEG MESRS PIU for component 3.3.
B	INCIDENTS AND ACCIDENTS Promptly notify the Bank of any incident or accident related to the Project and its Associated Facilities which has, or is likely to have, a significant adverse effect on the environment ,the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.	Notify the Bank no later than 48 hours after learning of the incident or accident and 24 hours in case of SEA/SH or fatality. Furnish the Bank with a summary report that includes a description and analysis of the root causes of the incident or accident and mitigation or prevention measures not later than 10 days after notification of the incident (unless a different timeframe is agreed with the Bank), as per the Bank's request Provide subsequent report to the Bank within a timeframe acceptable to the Bank Submit the monthly reports to the Bank annexes	STEG MESRS PIU for component 3.3.
С	CONTRACTORS' MONTHLY REPORTS In contracts for works using the Bank's standard procurement documents (SPDs), contractors and Owner Engineer firms are required to provide monthly monitoring reports. STEG shall require contractors and supervising firms to	Submit the monthly reports to the Bank annexes to the reports to be submitted under action A above.	MESRS PIU for component 3.3.

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MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank.		
	The contractors shall submit these reports to STEG.		
ESS 1	: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AN	ID IMPACTS	
1.1	ORGANIZATIONAL STRUCTURE: A- establish and maintain an organizational structure with qualified staff and adequate resources to support management of ESHS risks and impacts of the Project, including a social development specialist, a biodiversity specialist (with experience in avian issues and transmission line), an environmental specialist and a gender/Gender-based Violence (GBV) specialist, all with experience and qualifications acceptable to the Bank.	An organizational structure with environmental and social development specialists (including a Gender/GBV specialist) shall be hired by 90 days after Effective Date. This structure shall be maintained throughout Project implementation. The Biodiversity Specialist and a Gender/GBV specialist shall be hired by three months after	STEG MESRS PIU for component 3.3.
	B- Hire an Owner Engineering Firm that will have at least one Senior Environmental Expert, one senior Social Development Expert and one senior Biodiversity Expert (with experience in avian issues and transmission lines) employed on a full-time basis, all with experience and qualifications acceptable to the Bank, and maintained throughout Project implementation.	Effective Date and shall be maintained throughout the project implementation (see also 6.3) B- The Owner Engineering Firm is hired and in place prior to the signing of key contracts for component 1 and 2 and shall be maintained throughout Project implementation.	

MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME		
1.2	 ENVIRONMENTAL AND SOCIAL INSTRUMENTS All instruments shall be adopted and implemented and consistent with the relevant ESSs 1. The Borrower has prepared and disclosed an environmental and social impact assessment (ESIA) for the Project and Associated Facilities. Its recommendations, which are indicated in the Environmental and Social Management Plan embedded in the ESIA (ESMP), shall be implemented in a manner acceptable to the Bank. The ESIA shall be in full consistency with the Biodiversity Management Plan (BMP), the Checklist E&S requirements in the contracts between STEG and contractors, and clauses applicable to ensure consistency with the Bank's Environmental and Social Framework (ESF). 2. Prepare, disclose, consult upon, adopt and implement an ESIA with and embedded site specific ESMP for the new sub-station and overhead transmission line (OHL) at Grombalia. This ESIA and its ESMP shall be consistent with ESF. 	 . 1. The ESIA was prepared and disclosed on April 13,2023. The mitigation measures contained in the ESIA (ESMP) shall be implemented throughout Project implementation. The ESIA reflecting the findings and recommendations of the final BMP shall be updated and disclosed prior to the start of the bidding process. 2. Adopt and disclose the ESIA (including site-specific ESMPs) prior to the start of the bidding process and maintained throughout implementation 	ENTITY/AUTHORITY STEG MESRS PIU for component 3.3.	
	3. Provide the contractors with the overarching guidance, prescriptions, legal requirements and permits needed during civil works. Therefore, the Borrower, shall prepare a general ESMP to this end in form of Sediment and Erosion Management Plan, Waste Management Plan, Community HS Plan, Supply Chain Management Plan, Water Management Plan, Quary and materials management plan, Emergency response plan and a Traffic management plan. The contractor shall then prepare site/route-specific or work-specific plans, based on the guidance provided in the ESMP to that end and thereafter adopt and implement these measures consistent with ESSs.	3. Adopt the general ESMP depicting the overarching guidance, prescriptions, legal requirements and permits needed during civil works, prior to the start of the bidding process and maintained throughout implementation		
1.3	MANAGEMENT OF CONTRACTORS 1.Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. 1. Prior to the preparation of bidding	STEG MESRS PIU for component 3.3.	

ΜΑΤΙ	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY	
	 contracts with contractors and Owner Engineer. Thereafter ensure that the contractors and Owner Engineer comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. 2. Under procurement contracts and granted contracts include the requirement for contractors to prepare a Contractor Environmental and Social Management Plan (C-ESMP) and ensure they are implemented. 	documents 2. The C-ESMP shall be submitted by the contractors, once the Contract is signed and prior to the start of works.		
1.4	TECHNICAL ASSISTANCE During the implementation of this Technical Assistance (TA) (capacity building), the Bank will review the Terms of Reference (for example, the RE training and teaching materials to be prepared for the center of excellence should also include appropriate E&S aspects (the selection of trainees/trainers should be inclusive and not discriminatory, measures should be put in place to prevent and respond to sexual exploitation and abuse of trainees by trainers, and sexual harassment of amongst staff members, etc.) to ensure consistency with the ESSs. Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are conducted in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs and thereafter ensure that outputs reflect and comply with the terms of reference approved by the Bank.	Prior to the commencement of the bidding process (call to tender) and subsequently throughout Project implementation.	STEG MESRS PIU for component 3.3.	

MATI	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	ASSOCIATED FACILITIES Ensure that the activities in the identified Associated Facilities (the submarine cable in Tunisian territorial waters (101 km), owned by STEG) are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the ESIA (including ESMP), Resettlement Plan(s) (RP), ESMPs, Labor Management Procedure (LMP), management of contractors, and Stakeholder Engagement Plan (SEP).	Throughout Project implementation	STEG
ESS 2	: LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES 1-Adopt and implement the LMP of the project including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and Owner Engineer.	1-The LMP have been prepared and disclosed on the web sites of STEG and the Bank on April 13, -2023.	STEG MESRS PIU for component 3.3.
	2-Sign an agreement with contractors to ensure their compliance with all the applicable obligations in the LMP and the labor code in force in Tunisia.	2- Before the contract signing with relevant contractors and maintained throughout Project implementation.	
	3-Prepare a standalone Occupational Health and Safety Plan (OHSP).	3-Prior to the commencement of the bidding process.	

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MATE	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. Require contractors carrying out the works to establish, operationalize and maintain a grievance mechanism for Project workers, as described in the labor management procedures, and in accordance with the provisions of ESS 2, to be reflected in the C-ESMP.	The labor grievance mechanism shall be operational prior to the hiring of the Project workers and is maintained throughout Project implementation.	STEG MESRS PIU for Component 3.3.
ESS 3 3.1	: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT WASTE MANAGEMENT PLAN	Prior to the start of works under Components 1	STEG
	Develop, adopt and implement a Waste Management Plan (WMP), to be included in the C-ESMP, consistent with ESS3.	and 2 of the Project, and thereafter implemented throughout Project implementation.	
	: COMMUNITY HEALTH AND SAFETY		
4.1	TRAFFIC AND ROAD SAFETY Require and ensure that Traffic and Transport Plan is prepared, disclosed, adopted and implemented to manage traffic and road safety risks and is incorporated into C- ESMP.	After signing the contract with the Contractor and prior to the commencement of works, and thereafter implemented throughout Project implementation.	STEG
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, community health and safety standards, and include mitigation measures in the ESMP and OHSP. Develop, adopt and implement measures and actions to assess and manage the risks and impacts to local communities arising from Project activities, including risks related to labor influx such as the spread of COVID-19, sexual	The measures to manage risks related to labor influx have been included in the ESMP, which is part of the final ESIA that has been disclosed on April 13, 2023.	STEG
	abuse and exploitation (SEA), and the emergency response plan, as specified in the ESMP in points 1.3 and 1.4 and the SEA/SH Prevention and Response Plan (see point 4.3 below). As per the ESIA, the C-ESMP shall integrate measures on community health and safety, community grievance, and shall be prepared prior to the start of		

MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY	
	works.			
	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES The Recipient shall require contractors to develop, adopt and implement a standalone OHS Plan.	A standalone OHS Plan shall be developed before the commencement of works.	STEG	
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Prevention and Response Action Plan, to assess and manage the risks of SEA and SH, consistent with ESS4.	Adopt the SEA/SH Action Plan prior to the publication of bidding documents, and thereafter implement the SEA/SH Action Plan throughout Project implementation	STEG MESRS PIU for component 3.3	
ESS 5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTL	EMENT		
5.1	RESETTLEMENT POLICY FRAMEWORK Prepare, disclose, consult upon, adopt and implement a Resettlement Framework (RF) for the Project, consistent with ESS5.	The RF was adopted and disclosed on April 13, 2023, and thereafter implement the RF throughout Project implementation.	STEG	
5.2	RESETTLEMENT PLANS Prepare, disclose, consult upon, adopt and implement a resettlement plan (RP) for each activity under the Project for which the RF requires such RP, as set out in the RF, and consistent with ESS5. The activities include construction of Tunisia High Voltage Direct Current (HVDC) converter station in Mlaabi, the substation in Grombalia (if needed) overhead lines and the landing site.	Prepare, disclose, consult upon, adopt, and implement the respective RAPs prior to the taking of land and the start of works, including ensuring that before any taking of land and related assets, full compensation and livelihood restoration measures, as needed, in line with the requirements in the RAP has been provided to the Project Affected People and as applicable, displaced people have been resettled and moving	STEG in collaboration with Ministry of State Property and Land Affairs, Industrial Land Agency (IFA), Office of Topography and Cartography (OTC), Ministry of Agriculture and relevant Directorates:	

MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		allowances have been provided.	
5.3	GRIEVANCE MECHANISM Ensure that the RF, RAPs and SEP provide detailed information on the grievance mechanism (GM) to which complaints and feedback on involuntary resettlement under the Project can also be directed.	The GM shall be operational before the start of resettlement activities under each investment and maintained throughout Project implementation.	STEG
ESS 6	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING N	IATURAL RESOURCES	
6.1	BIODIVERSITY RISKS AND IMPACTS Update the Draft BMP which shall contain details about the mitigation measures to be implemented, especially for each of the critical habitats as well as an approach for compensatory measures as needed prior to the start of works that is consistent with ESS6 (see section 6) and implement a BMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.	The Draft BMP shall be updated and redisclosed after the completion of a full Critical Habitat Assessment (CHA) and field surveys prior to start of bidding process STEG shall share the report of the two studies with the Bank prior to the start of works. The ESIA was updated and redisclosed. Updated BMP prior to engaging contractors	STEG
	Update, redisclose and implement ESIA after the completion of the required biodiversity survey (s) mentioned in 6.2 and the updating of Draft BMP.		
	For the marine aspects, conduct a final routing study and ensure that the selection of burial methods are shared with the Bank to inform the finalization of the BMP in a manner acceptable to the Bank.		

MAT	ERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
6.2	STEG shall conduct biodiversity field survey(s) as required by ESS6 on Habitats, Birds, Bats, and Mammals acceptable to the Bank and shall incorporate the key findings into the BMP. The Borrower shall submit the Terms of Reference (TORs) for the surveys for a non-objection to the Bank prior to the launch of the bidding process.	The Surveys shall be conducted prior to the launch of the bidding process.	STEG
6.3	STEG shall conduct a full Critical Habitat Assessment (CHA) study in a manner satisfactory to the Bank and shall incorporate the key findings into the BMP.	Prior to the signing of the civil works contract(s) and the start of any works.	STEG
6.4	SEG shall finalize and re-disclose the BMP acceptable to the Bank and shall demonstrate that adequate human and financial resources shall be devoted to ensuring full compliance with ESS 6 requirements (including how the mitigation strategy will achieve the No Net Loss for Natural Habitat and how the net gain on biodiversity will be attained for Critical Habitat).	STEG shall submit an updated BMP to the Bank which shall contains details about the mitigation measures to be implemented especially for each of the critical habitats as well as an approach for compensatory measures prior to the start of works.	STEG
		The Final BMP shall be finalized and disclosed prior to the start of works.	
6.5	Implement the updated BMP in a manner consistent with ESS6 and acceptable to the Bank that provides a detail roadmap of the key mitigation measures that shall be developed and implemented throughout project implementation.	The updated BMP and shall be implemented throughout the life of the project.	
6.6	Develop and implement a robust biodiversity monitoring and evaluation program for the operational phase of the project as enunciated in the BMP. STEG shall implement adaptive management in this regard, based on the results of the monitoring.	As part of the BMP and shall be implemented throughout the life of the project	STEG
		The post-construction monitoring protocol for birds shall be submitted to the Bank for its non- objection prior to the end of construction (no later than 3 months prior to the end of construction	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
6.6	Require contractors to adopt and implement relevant biodiversity measures	The C-ESMP shall be prepared prior to the	STEG
	and actions as required in the ESMP, BMP and C-ESMP mentioned in actions	commencement of civil works and thereafter shall	
	1.3 and 1.4 above and as required in the C-ESMP in accordance with the	be implemented throughout the duration of the	
	ESMP and BMP.	Contractor works	
ESS 8	: CULTURAL HERITAGE		
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the C- ESMP, in accordance with the guidelines of the ESIA prepared for the Project, including: (i) the hiring of an archaeologist during construction in order to monitor excavation activities, (ii) conducting an archaeological assessment by STEG under the supervision of the National Heritage Institute (NHI) department prior to the commencement of construction works in particular for the OHL line in an manner that consistent with ESS8.	Adopt the CHMP prior to the commencement of works, and thereafter implement the CHMP throughout Project implementation.	STEG
			STEG
ESS 9	: FINANCIAL INTERMEDIARIES		
Not R	elevant	under	
ESS 1	0: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE
10.1	STAKEHOLDER ENGAGEMENT PLAN The SEP has been prepared, consulted and disclosed prior to appraisal, including a grievance mechanism (GM), consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	The SEP has been prepared, consulted and disclosed on April 13, 2023. The SEP shall be implemented throughout the life of the Project and updated if necessary.	ENTITY/AUTHORITY STEG MESRS PIU for component 3.3.

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY	
10.2	 PROJECT GRIEVANCE MECHANISM 1. Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), to receive and facilitate resolution of concerns and grievances as described in the SEP, to promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in accordance with ESS10. Adequate resources shall be provided for the operation of the GM. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. STEG shall document all Project related grievances in a formal manner, in 	 1.The GM shall be operational prior to the start of works and shall be updated in conjunction with any update of the mechanism and the SEP throughout Project implementation 2.The existing GM under PASE Project shall 	STEG MESRS PIU for component 3.3.	
	 accordance with the principle of safety and confidentiality, and ensure timely handling and resolution of complaints to close complaint cases. 2. While the Project GM is pending to be established and operationalized, The GM of the STEG under the PASE Project (P168273) shall be used. This has multiple uptake channels including through telephone, email, online form on the STEG 's website. These channels are materially consistent with requirements of ESS 10 and will be used to receive, process and address project related grievances received from complainants. 3. In addition, also the Ministry of Higher Education and Scientific Research that will be implementing component 3.3, a GM is in place including hotlines and emails, at Ministry Level, and platforms at University Level. These channels are materially consistent with requirements of ESS 10 and will be used to receive, process and address at University Level. These channels are materially consistent with requirements of ESS 10 and will be used to receive, process and platforms at University Level. These channels are materially consistent with requirements of ESS 10 and will be used to receive, process and address project related grievances received from complainants. 	remain operational until the Project GM under 1 above becomes operational.		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	 Training of STEG on ESF should be provided to ensure that obligations entered into under the ESCP are properly monitored and implemented by operational bodies and senior officials of the administrations concerned. Training of STEG, MESRS PIU (for component 3.3), contractors and workers on the appropriate and consistent use of Personal Protective Equipment (PPE). Training on Biodiversity post construction monitoring Training on the grievance mechanism for the PMU and other persons responsible for its operationalization (members of the local community, contractors' personnel, etc.) Training of the contractors' workers on transmissible diseases prevention measures and protocols. Awareness training for workers on measures to combat sexual abuse and gender-based violence Awareness training for local communities on electrocution risks Emergency preparedness and response (e.g., natural disasters or any other risk) Training on Grievance Mechanism (GM) 	No later than 90 days after the Effective Date and maintained throughout Project implementation.	STEG MESRS PIU for component 3.3.