

Environmental and Social Action Plan – Tozeur & Sidi Bouzid solar PV Project (May 2024)

Number	Action	Deliverable	Deadline	Applicable to
PS 1				
1	The PE will be required to develop a project specific ESMS and OHSMS in line with MIGA PS1 requirements, first for the construction period with a revised version for the operation period.	Submit to MIGA the ESMS and OHSMS manuals.	Before the beginning of construction activities	Tozeur & Sidi Bouzid
2	The PE will be required to develop Environmental & Social Management Plans (ESMPs) and Occupational Health & Safety Management Plans (OHSMPs) to be in line with Tunisian laws, MIGA’s PSs and WBG EHS guidelines for the construction and operations phases.	ESMPs & OHSMPs	Before the beginning of construction activities	Tozeur & Sidi Bouzid
3	The PE will be required to hire an E&S Manager covering both sites, and one HSSE Manager and one CLO per site.	Responsibility assigned to a suitably qualified person. Name and contact of the responsible person provided to MIGA	Before the beginning of construction activities	Tozeur & Sidi Bouzid
4	The PE will be required to develop an Emergency Response Plan (ERP).	ERP	Before the beginning of construction activities	Tozeur & Sidi Bouzid
5	The PE will be required to recruit an independent E&S consultant to conduct a post construction E&S audit of the Project, including activities under STEG's control, with reference to the ESAP and regulatory E&S requirements and implement any identified corrective action.	Audit report Evidence of corrective actions implementation	At the end of construction activities	Tozeur & Sidi Bouzid
6	The PE will be required to update the SEP by including all potential people affected by the Project (PAP) and defining a clear timeline for their engagement.	Updated SEP	Before the beginning of construction activities	Tozeur & Sidi Bouzid
PS 2				
7	The PE will be required to prepare a transparent procedure for the recruitment of local workers by Scatec Solar Tunisia Construction SARL and its subcontractors and consult the local authorities and employment bureau before finalizing the procedure and implementing it.	Procedure prepared and finalized before construction. Procedure implemented during construction	Before and during construction	Tozeur & Sidi Bouzid
8	The PE will require STEG and contractors to develop a grievance mechanism meeting PS2 requirements and available to their workers and their sub-contractors and monitor its effectiveness and ensure that workers are informed of their right to resort to Scatec’s grievance mechanism in case their concerns are not satisfactorily handled.	Grievance mechanism prepared Scatec’s contractors. Grievance mechanism prepared by STEG and included in contractors legally binding documentation. Effectiveness monitored by Scatec	Before the beginning of construction activities During construction and operation	Tozeur & Sidi Bouzid
9	The PE will be required to prepare and implement a workers grievance mechanism, meeting PR2/PS2 requirements, for the operation activities under Scatec control.	Grievance mechanism	Before the beginning of operation activities	Tozeur & Sidi Bouzid

10	The PE will be required to design, build and operate the Project with a work environment that is suitable for both men and women (notably with separate toilets and change/rest rooms), and specifying on job announcement that positions are open to both men and women.	Clause included in contracts. Suitable work environment. Equal opportunities recruitment demonstrated	During construction and operation	Tozeur & Sidi Bouzid
	The PE will be required to implement the accommodation camp in line with MIGA PS 2 and with <i>IFC/EBRD guidance note for workers accommodation: Process and Standards</i> and conduct monthly inspections of the workers accommodation	Monthly inspections carried out by Scatec ESHS manager, and non-compliances addressed. Non-compliances reported in regular reports to MIGA	During construction	Sidi Bouzid
11	The PE will be required: (i) to appropriately communicate to Project employees the Scatec HR policies translated in French and Arabic and meeting Tunisian legislation and MIGA PS2 requirements. (ii) to ensure that all employee contracts are consistent with Tunisian labor codes and MIGA PS2 requirements. All employees (including those employed by contractors and subcontractors) will be provided with a contract in French/Arabic. (iii) during induction training, to ensure that the new hires are made aware of the terms and conditions of their employment, including the HR Policy, DEIB policy and Code of Conduct, as part of the hiring package.	Scatec HR policies in French and Arabic. Policies attached to workers contracts. Employee Induction training records.	Before the beginning of construction activities During the hiring process, before the new hire starts working	Tozeur & Sidi Bouzid
12	The PE will be required to develop a traffic management plan	Traffic management plan	Before the beginning of construction activities	Tozeur & Sidi Bouzid
13	The PE will be required to set up an H&S Committee composed of worker representatives to provide feedback and recommendations on H&S matters, in accordance with Tunisian regulations.	H&S Committee minute of meeting	During construction	Tozeur & Sidi Bouzid
14	The PE will be required to put in place appropriate monitoring requirements and conduct audits of staff (quarterly during construction, then annually during operation) to obtain assurance that the contractors and their sub-contractors maintain statutory compliance with host country law, the employers labor requirements, and PS2 provisions. The PE will also monitor and document STEG's E&S performance and work with STEG towards compliance with host country laws and MIGA's E&S requirements.	HR audits and inspections carried out, and non-compliance addressed. Non-compliances reported in regular reports to MIGA	During construction and operation	Tozeur & Sidi Bouzid
15	The PE will be required to include in all sub-contracts for the construction and operation of the Project (i) an obligation to act in compliance with MIGA's PSs, (ii) an obligation to implement any corrective action required by MIGA in case of established non-compliance, and (iii) an obligation to implement the ESAP actions under their responsibility, if any. The PEs will also document their engagement with STEG for STEG to implement the same requirements.	Clause included in contractor's contracts. Corrective actions (if any) implemented.	Before the beginning of construction activities	Tozeur & Sidi Bouzid

16	The PE will be required to: (i) conduct a supply chain risk assessment of the nominated primary solar suppliers and develop supply chain risk assessment procedure and a screening mechanism against risks for alleged forced labor in the solar supply chain; and (ii) incorporate or require the EPC Contractor to incorporate the provisions related to child labor and forced labor in each contractual agreement it or the EPC contractor enters into with a solar supplier.	Supply chain risk assessment report Clauses in contracts	Before the procurement of solar panels	Tozeur & Sidi Bouzid
PS3				
17	The PE will require its contractors: (i) to develop and implement a Water Management Plan for construction and operation. (ii) if the waterless technology is not used, to submit to MIGA's approval a "best available technology" study comparing waterless and with- water solutions from a technico- economic and E&S perspective.	Water Management Plan Waterless technology or "best available technology" study	Before the beginning of construction activities During design	Tozeur & Sidi Bouzid
18	The PE will be required to implement speed limit and to require its contractors to use water spraying or compacted gravel on earth roads during the construction period to prevent dust formation.	Clause included in contractor's contract. Evidence of speed limit signage	Before the beginning of construction activities	Tozeur & Sidi Bouzid
19	The PE will require its contractors to develop a Waste Management Plan including specifics for management of broken, expired, or surplus PV panels, in line with good international industry practices, national laws and MIGA's PS3 requirement.	Waste Management Plan	Before the beginning of construction activities	Tozeur & Sidi Bouzid
20	The PE will be required to ban the use of herbicides or pesticides during the construction and operation period, in particular for vegetation control, and include this ban in the contractors' contracts.	Ban included in contractors' contracts.	During construction/operation	Tozeur & Sidi Bouzid
PS 4				
21	The PE will request its contractors to implement Community Health and Safety and Worker Influx actions in line with the PE's HSSE program. The actions will include an assessment of worker influx and will include: (i) a communicable disease (including HIV/AIDS and sexually transmitted infections) awareness and prevention program for site workers as well as local communities; (ii) requirements for adequate on-site medical facilities; (iii) a community grievance mechanism; (iv) GBV awareness sessions; and (v) provisions for periodical monitoring of social related effects of the influx of migrants.	Community Health and Safety and Worker Influx actions	Before the beginning of construction activities	Tozeur & Sidi Bouzid
22	The PE will be required to (i)conduct a Security Risk Assessment and (ii)develop and implement a Security Management Plan as part of the HSSE Management Program, for the construction and operations phases (including site access control and register) in line with MIGA's PS4 including IFC's "Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts" and the Voluntary Principles on Security and Human Rights, and provisions as part of the established monitoring and reporting requirements described in PS1	(i) Security Risk Assessment report (ii) audits of the established security (quarterly during construction, then annually during operation)	Before the beginning of construction activities	Tozeur & Sidi Bouzid
PS 5				

23	The PE will be required to manage any land related claim within its external grievance redress mechanism, and if needed, will collaborate with the Ministry of State Domain to ensure that complains are addressed in compliance with Tunisian Laws and PS5 requirements	Grievance Redress Mechanism's log.	During construction and operation.	Tozeur & Sidi Bouzid
24	The PE will be required to engage a E&S consultant to: (i) update the inventory of the LARF identify and consult the potential PAP, and if applicable, (ii) compensate the affected persons accordingly, before the PV sites construction, in line with MIGA PS5 requirements, and to (iii) assess the STEG land acquisition process against the MIGA PS5 requirements	Updated LARF report Evidence of compensation if applicable	Before the beginning of land clearing/preparation activities	Tozeur & Sidi Bouzid
PS6				
25	The PE will be required to propose biodiversity-related actions and monitoring as part of the Project ESMP for Tozeur.	Tozeur ESMP with biodiversity actions and monitoring aligned with Lenders ESDD recommendations	Before the beginning of land clearing/preparation activities	Tozeur
26	The PE will be required to (i)propose biodiversity-related actions and monitoring as part of the Project ESMP for the Sidi Bouzid, including compliance with national law with respect to risks related to nationally protected species, and aligned with the lender ESDD recommendations. (ii)require STEG to propose biodiversity-related actions in line with lender ESDD recommendations to mitigate and monitor biodiversity risks related with the OHTL in the proximity of the IBAs.	Sidi Bouzid ESMP with biodiversity actions and monitoring aligned with Lenders ESDD recommendations	Before the beginning of land clearing/preparation activities	Sidi Bouzid
PS8				
27	PE will be required to: (i)prepare a Chance Find Procedure before PV sites clearing; (ii)train workers on the nature of potential chance finds, and the way to manage them; and (iii)engage with local communities to confirm that there are no sites of cultural significant importance within the Project footprint.	Chance Find Procedure Workers' training log Evidence of engagement with local communities	Procedure prepared before works start and approved by Scatec. Workers trained during their induction training	Sidi Bouzid Sidi Bouzid & Tozeur Sidi Bouzid & Tozeur