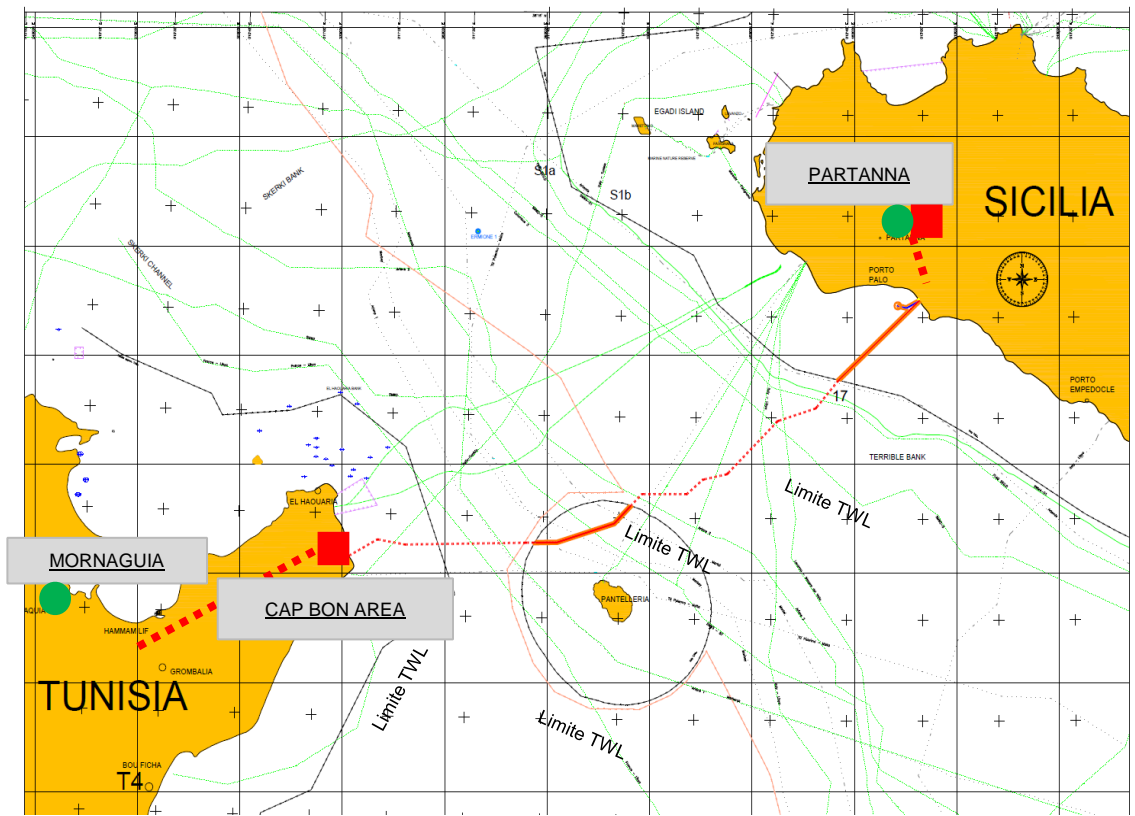


Republic of Tunisia  
FEASIBILITY STUDIES OF THE  
TUNISIA – ITALY POWER INTERCONNECTION

Stakeholder Engagement Plan

ELMED ETUDES SARL

As Implementing Agency



April 2018

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## GLOSSARY

**Consultation:** The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

**Dialogue:** An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.

**Community Based Organizations (CBOs):** Organizations that are established by communities and comprise community members. Examples of CBOs include farming cooperatives.

**Corporate Responsibility (CR):** A concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders.

**Community social investments:** Contributions (monetary, staff time or gifts in kind) that are made to stakeholders and bring benefits to these stakeholders over and above an operation's core activities. The beneficiaries of these contributions can range from local to national and international stakeholders. These investments are generally aimed at addressing needs within a target community. The scope of these activities could range from donations to charities that link with business needs and strategies, for example capacity building and skills development, amongst residents for employment purposes, and local procurement.

**ELMED Etudes SARL:** a limited-liability company established on April 20, 2009 and registered in Tunisia.

**Engagement:** A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader "stakeholder engagement" strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the project.

**Environmental and Social Impact Assessment (ESIA):** An assessment comprising various social and environmental studies which aim to identify project impacts and design appropriate mitigation measures to manage negative impacts, and to enhance positive project impacts.

**Feasibility/Pre-Construction phase:** The phase of a project which includes the Environmental and Social Impact Assessment, and financial and engineering feasibility studies.

**Life of Interconnection:** Number of years that are estimated for the asset in operation.

**Livelihoods:** The financial and/or subsistence activities undertaken by households to meet their daily needs. Typically, rural households undertake multiple livelihood strategies that include subsistence farming and informal trading.

**Local communities:** Refers to groups of people living in close proximity to a project that could potentially be impacted by a project ("Stakeholder", in contrast, refers to the broader group of people and organizations with an interest in the project).

**Non-Government Organizations (NGOs):** Private organizations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.

**Partnerships:** In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

**Pre-Feasibility phase:** The phase of a project which includes a Screening Study to identify social and environmental fatal flaws, and a Scoping Study to identify and assess the social and environmental issues of a proposed project and evaluate project design alternatives prior to proceeding to project feasibility.

**Preparation Studies:** *inter alia*, (a) a terrestrial survey feasibility study to determine potential routes and landing points of the Proposed Project for the area converter station, the direct current cable route from the landing point of the marine cable on the coast to the converter station on land and the AC cable route from the converter station to the grid node in both Tunisia and Italy's territories; (b) a marine survey feasibility study to determine potential routes and landing points of the submarine direct current cable; (c) a network study to determine (i) the electrical Proposed Project scheme; (ii) the feasible technology; and (iii) the performance required to the direct current system; (d) an environmental and social impact study, which shall include a Social and Environmental Impact Assessment/Environmental and Social Management Plan ("ESIA/ESMP") and a Resettlement Action Plan ("RAP"); (e) the development of the financial model for the financial viability of the Proposed Project; and (f) a market study, which shall include, *inter alia*, the integration of Maghreb electricity markets and Europe.

**Project:** Support to the GOT in evaluating the feasibility of the Proposed Project.

**Project Area:** A geographical area within which direct and indirect impacts attributable to a project can be expected. Typically, a Project Area is: (i) unique to a project (ii) larger than the actual footprint of a project, and encompasses socio-economic issues and impacts, as well as issues and impacts associated with other disciplines (e.g. environment, health and safety). Defining the Project Area is used to determine a project's area of influence and responsibilities. It also provides guidance on the area within which impacts need to be monitored, and managed, and it also assists with defining project stakeholders that should be engaged an ESIA process. **Proposed Project:** Tunisia – Italy Power Interconnector (HVDC 600MW submarine cable between Partanna – Sicily – and Cap Bon peninsula – Tunisia)

**Proposed Project Sponsors:** STEG (Société Tunisienne de l'Electricité et du Gaz) and TERNA S.p.A.

**Stakeholder:** Any group or individual who can affect or is affected by a company and its activities.

**Stakeholder Engagement Plan:** A plan which assists managers with effectively engaging with stakeholders throughout the life of the plant and specifying activities that will be implemented to manage or enhance engagement.

**Sustainable Development:** Development can be sustainable if it *meets the needs of the present without compromising the ability of future generations to meet their own needs.*<sup>1</sup>

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<sup>1</sup> World Commission on Environment and Development, Our Common Future (Oxford, New York University Press, 1987)

## LIST OF ABBREVIATIONS AND ACRONYMS

CBO	Community Based Organizations
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EMP	Environment Management Plan
ESIA	Environmental Social Impact Assessment
ESMP	Environmental and Social Management Plan
GOT	Government of Tunisia
HVDC	High Voltage Direct Current
NGO	Non-Governmental Organization
SEP	Stakeholder Engagement Plan
STEG	Société Tunisienne de l'Electricité et du Gaz Tunisian Company of Electricity and Gas
TERNA	Terna is the private Italian transmission system owner-operator
ToR	Terms of Reference
TSO	Transmission System Operator
WB	World Bank
WBG	World Bank Group

Please also include: GIF, ESMAP, IBRD, OP, SEA and other missing acronyms

## **1. INTRODUCTION**

### **1.1. Purpose and scope**

The Italian and Tunisian Transmission System Operators (TSO), TERNA and STEG, started the development of a project for connecting the Italian and Tunisian electrical networks at the end of 2000s.

On 29 June 2007, the Governments of Italy and Tunisia signed a Joint Declaration instructing STEG and TERNA to develop a project interconnecting the national power systems of both Countries.

To reach this purpose, STEG and TERNA established the Tunisian joint-company (50%-50%) **ELMED Etudes Sarl** whose mission is to carry out all the necessary studies and activities **preceding the construction of the power infrastructure**.

Since then, preliminary studies have been carried out to identify as preferred option a high voltage direct current (HVDC) 600 MW submarine cable linking the converter stations to be built at Partanna (Sicily – Italy) and in the Cap Bon peninsula (Tunisia).

The Proposed Project is a major infrastructure project linking an emerging market country with a highly industrialized European country. As well as the economic benefit of providing surplus European electricity to a country in need of electricity, the project has political ramifications in that it strengthens ties of a stable yet fragile North African country to Europe.

Up to now, no Scoping Consultations have been held for the preparation of the Social Impact Assessment to provide stakeholders with an opportunity to raise their concerns. Further feasibility studies will be needed before STEG and Terna take their Investment Decision.

To carry out these further studies the Government of Tunisia (GOT) is going to sign an ESMAP Grant Agreement and a GIF Grant Agreement. Both Agreements state that the Government of Tunisia shall cause ELMED Etudes to carry out the Preparation Studies.

This Stakeholder Engagement Plan (SEP) will assist ELMED Etudes and the Sponsors with managing and facilitating future engagement through the Proposed Project's life. This version of the SEP is an initial guide to engagement and will need to be revised following Proposed Project's activities to inform on-going stakeholder engagement.

### **1.2. Objectives of the Stakeholder Engagement Plan (SEP)**

The SEP seeks to define 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 ELMED Etudes, TERNA, 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 Tunisian and Italian legislation;
- Provide guidance for stakeholder engagement such that it meets the standards of International Best 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 and appropriate consultations;
- Guide ELMED Etudes, STEG and TERNA to build mutually respectful, beneficial and lasting relationships with stakeholders;
- Develop a stakeholders' engagement process that provides stakeholders with an opportunity to influence project planning and design;
- Establish formal grievance/resolution mechanisms;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings; and
- Assist ELMED Etudes, STEG and Terna with securing and maintaining a social license to operate throughout the life of the Proposed Project.

## **2. STAKEHOLDER ENGAGEMENT STANDARDS APPLICABLE FOR THE PROJECT**

The GOT has negotiated a financial package with GIF and ESMAP, for which the International Bank for Reconstruction and Development (IBRD) acts as Technical Partner. According to IBRD's Operational Policies, and in particular those dedicated to "Environmental Assessment" (OP 4.01) as well to the "Involuntary Resettlement" (OP 4.12), projects funded by IBRD are required to comply with procedures pertaining to Public Consultations. Likewise, the proposed project has to comply with Italian and Tunisian legal requirements frameworks.

### **2.1 Italian requirements**

The Proposed Project has also to be compliant with the Italian legislation, which provides for a Strategic Environmental Assessment (SEA), a coordination tool aimed at integrating environmental concerns into the planning process, by considering its effects on the

environment. According to European Union Directive 2001/42/EC, the SEA process should aim at guaranteeing high levels of environmental protection and promoting sustainable development. According to current legislation (Legislative Decree 152/2006), transposing the above-mentioned Directive 2001/42/EC, the SEA procedure is divided in 6 phases: Preliminary Analysis, Environmental Report, Consultation Process, Evaluation, Decision, and Monitoring.

As the Proposed Project has been included in the 3<sup>rd</sup> List of Project of Common Interest (PCI), it is subject to clause 9 of the EU Reg. Reg. 347/2013. According to this article, each Member State shall publish a manual of procedures for the permit granting process applicable to the PCI. The manual issued by the Italian Ministry of Economic Development provides that for each PCI a public participation and consultation plan, giving the most information on the project, must be submitted and public consultation must be carried out.

## 2.2 Tunisian requirements

The Tunisian legislation rules the Environmental and Social Impact Assessment by the Decree N ° 91-362 of March 13th, 1991 modified by the decree N ° 2005-191 of July 11th, 2005. Projects funded by International Financial Institutions must be also compliant with Environmental, Health and Safety Directives (EHS Guidelines) of the World Bank Group. According to the World Bank Environmental Screening the Proposed Project is classified as Category "A", as it is *“likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. This impact may affect an area broader than the sites or facilities subject to physical works.*

The ESIA should include an analysis of the positive and negative physical, biological, social, economic and cultural potentials of the proposed project. It must include the identification and assessment of the direct, indirect and cumulative impacts of the proposed project in the area of influence to be defined by the Consultant.

For the social aspects, it is essential to give much importance to the aspects of involuntary displacement, acquisition of land and job losses and economic opportunities.

The analysis will include 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 Environmental and Social Management Plan (ESMP) of the preferred alternative, and provide a framework for mitigation measures, monitoring activities, and strengthening of institutional measures that will need to be integrated into the project design and implementation. As part of this process, it is expected that a series of Public consultations will be undertaken, and the environmental and social study will be disclosed to the public.

The ESIA will take into account the natural environment (air, land and water), the health and safety of the population, social aspects (involuntary displacements of people, economic impacts and acquisition of land, indigenous populations (if applicable) and cultural heritage), and trans-boundary and global environmental issues (climate change, depletion of the ozone layer, pollution of international waters, and adverse effects on biodiversity).

The World Bank's Environmental Assessment Policy (Operational Policy 4.01) requires that for all Category A projects during the Environmental Assessment process, *“the borrower consults project-affected groups and local nongovernmental organizations (NGOs) about the project's environmental aspects and takes their views into account. The borrower*



*initiates such consultation as early as possible. For Category A projects, the borrower consults these groups at least twice: (a) shortly after environmental screening and before the terms of reference for the EA are finalized; and (b) once a draft EA report is prepared. In addition, the borrower consults with such groups throughout project implementation as necessary to address Environmental Assessment – related issues that affect them”.*

The policy also calls for adequate disclosure of documents “*For meaningful consultations between the borrower and the project-affected groups and local NGOs on all Category A and B projects proposed for IBRD or IDA financing, the borrower provides relevant material in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted”.*

Key elements for stakeholder engagement and consultations include the following:

- Promote and provide means for adequate engagement with affected communities throughout the project cycles that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated;
- Take account of the outcome of the engagement process with affected communities in the identification of risks and impact associated with the project;
- Maintain stakeholder engagement as a continuous process that involves stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to affected communities;
- Identify the range of stakeholders that may be interested in project activities and to facilitate a dialog with all stakeholders through a process of external communications;
- Provide affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of the proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process, and (v) grievance mechanism;
- Undertake a process of consultation in a way that provides the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them;
- For projects with potentially significant adverse impacts, to conduct an informed Consultation and Participation (ICP) process that will result in the affected communities’ informed participation. This process should be documented, and particular care taken to avoid or minimize adverse impacts on affected Communities, and will inform those affected about how their concerns have been considered;
- Establish a grievance mechanism to receive and facilitate resolution of affected communities’ concern and complaints about the project’s environmental and social performance.

Particular attention is to be paid to vulnerable individuals and communities in designing and implementing consultations.

### 3. STAKEHOLDER ANALYSIS AND IDENTIFICATION OF STAKEHOLDERS

### **3.1. Stakeholder analysis**

Stakeholder analysis determines the likely relationship between stakeholders and the Project/Proposed Project and helps to identify the appropriate consultation methods for each stakeholder group during the life of the Project/Proposed Project.

To this purpose, a process for identifying the environmental and social risks and impact of the Project/Proposed Project will be established, along with identification of 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. The stakeholder 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 : the range of stakeholders that may be interested in being involved and how external communications might facilitate a dialog with all stakeholders.

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

## 3.2. Stakeholder categorization

### 3.2.1. Terna side

Stakeholder profiles and a stakeholder map are used as tools on the local level.

A relationship of mutual trust between the company and its stakeholders, in 2015 TERNA described the relevant criteria and means in a “Stakeholder Management Model” guideline, which is in line with the AA1000 Stakeholder Engagement Standard (SES) developed by AccountAbility.

The model consists of a few basic parts that are regularly updated:

- Stakeholder map;
- The ranking of stakeholders by their importance, reflecting the degree of dependence and influence of each stakeholder with respect to Terna;
- The matrix of engagement techniques that guides Terna’s approach to stakeholder engagement activities; and
- The system for monitoring engagement activities, enabling the Company to summarize stakeholders’ opinions, their expectations and their level of satisfaction with Terna.

A specific engagement program is conducted each year to identify the actions to be taken in order to bring Terna’s relations in line with best practices and to ensure that the most influential stakeholders are listened to on a regular basis.

The categories of stakeholders identified within the map are:

- People in the organization
- Electricity system operators
- Suppliers
- Regulators of concessions
- Business partners
- Customers of non-regulated activities
- Shareholders
- Credit providers
- Public-decision makers and authorities
- Media and opinion-makers
- The community
- Local communities

The definition of “Local Communities” category is the following: *“Stakeholder of various kinds, interested in activities performed in a given area (local community) in all stages of the business, from grid development to line maintenance. Among the selected stakeholders, some are **directly or indirectly affected**, and some can **exert political influence or have decision making power** or act as **local opinion maker on political decisions.**”*

### 3.2.2. STEG side

Given the lack of a national standard model of a Stakeholder Engagement Plan, STEG has started this activity from the identification of Local communities partially affected and/or directly involved in the development of the Proposed Project. With the assistance of the Consultant to be engaged for carrying out the Environmental and Social Impact Assessment and Resettlement Plan, the Stakeholders Analysis and Categorization will be fine-tuned and completed.

The sub categories of the macro category “Local communities” are reported in the table below

<b>LOCAL COMMUNITIES SUBCATEGORIES</b>	<b>TUNISIA</b>	<b>ITALY</b>
LANDOWNERS WHOSE PROPERTY IS IMPACTED BY THE PROPOSED PROJECT	Citizens interested by the establishment of easement rights.	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)	Associations representing – at local level – economic interests (Confindustria, Confapi, Confartigianato, Confagricoltura, CIA, Coldiretti, Federalberghi, Employers’ associations), social interest (nonprofit organizations) and environmental interests (WWF, Legambiente, Lipu, FAI)
LOCAL MEDIA	WEB, Radio Cap FM, TV national channels	Media, TV, Radio of local reference
LOCAL ADMINISTRATORS (LOCAL AUTHORITIES)	Governorates (Ben Arous, Nabeul and Manouba); Mayors of the Region and theirs Delegates	Mayors, Mayors’ Delegates, Members of the Municipality and Provincial Assemblies, their representing bodies (ANCI)
LOCAL SUPPLIERS/CONTRACTORS AND SUBCONTRACTORS	Suppliers/Contractors of civil works of the Grand Tunis and Cap Bon Areas.	Current and prospective suppliers
LANDOWNERS WHOSE PROPERTY IS CROSS BY AN EXISTING LINE	Landowners whose land is already subject to an easement right	Landowners whose land is already subject to an easement right
LOCAL COMMITTEES (AGAINST THE	To be identified	To be identified

ELECTRICITY INFRASTRUCTURE)		
LOCAL POLITICIANS	Trade Unions (UGTT) and Political Parties	Members of the National Parliament with local constituency
LOCAL OPINION MAKERS	Local community influencer, variable roles depending on the specific community	Local community influencer, variable roles depending on the specific community (e.g. Parson ...)
INFRASTRUCTURAL SECTOR COMPANIES	Companies owning infrastructure with local presence (e.g. Gas, Railways, Roads, Telecommunication)	Companies owning infrastructure with local presence (e.g. Gas – SNAM, Railways – Ferrovie dello Stato, Roads – ANAS, Telecommunication – TELECOM)
OTHER CITIZENS IMPACTED BY THE PROPOSED PROJECT	Citizens immediately outside the easement zone (only visual impact, no property crossed)	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	Prefectures, Forestry Corp, Entities responsible for environmental aspects (Enti Parco and Comunità Montane)
OTHER CITIZENS IMPACTED BY EXISTING LINES	To be identified	To be identified
COMMUNITY BASED ORGANISATIONS (CBO)	Such as mosques and churches	Such as churches and mosques

The map of the actual local stakeholder impacted/ interested by the Proposed Project, will be defined together with the independent Consultant for the Environmental and Social Impact Assessment and Resettlement Action Plan.

#### 4. POTENTIAL RISKS LINKED TO THE PROJECT

The potential risks linked to the Proposed Project can be resumed and classified in the following three clusters: land acquisition; construction works and operation hazards.

##### 4.1 Landowners affected by the Proposed Project

These risks are generally linked to loss of properties including and not limited to land and land related assets, infrastructure and livelihood:

- Compensation price perceived as too low;
- Long and Slow payment procedures;
- Land tenure regime;
- Eligibility problems;
- Budget problems

In order to minimize and manage potential risks, from the initial planning phase of the Proposed Project, the Sponsors will reach out to local communities in the area where the project will be implemented, involving local authorities and citizens by public meetings. The aim is to listen to stakeholders' opinion in order to inform the planning, the design and the implementation of the project and agree on the best location for the new infrastructure, identifying the optimal corridor based on the classification of land/sea according the so-called "ERPA criteria" (Exclusion, Repulsion, Problems and Attraction) and with the support of GIS (Geographic Information System) technology, which includes all information relating to different types of land use and related protection constraints (regional, naturalistic, cultural, landscape, etc.).

Meetings will be organized and stakeholders participating in the event will be asked for their opinion via a questionnaire. Six areas are generally surveyed: familiarity with the sponsors, information on the project, eventual areas for improvement, usefulness of the meeting, the need for further information and a final opinion.

The construction of new power lines involves the use of between approximately 30 and 250 square meters of land – usually agricultural – for each pylon. Although the sponsors are legally authorized to use an expropriation procedure to obtain the use of land, they prefer solutions based on mutual consent, involving payment of one-off compensation for easement on private property. Attempts to reach a consensual solution do not always succeed, making enforcement measures necessary. The RAP will guide the process to be followed for any land take related issue.

When building a substation that occupies much more land, the sponsors usually purchase the necessary land.

The marine and terrestrial survey studies, together with the ESIS, will help define the best and less controversial route, by considering also the technology choice (underground lines rather than the aerial solution).

Reaching a consensual solution entails lengthy and difficult procedures. Outcomes are usually positive, but during the process local opposition may persist. In these cases, the sponsors are willing to examine the situation and seek alternative solutions – even ones that are technically more complex than those originally identified – provided that they are compatible with the general interest of maintaining the safety, efficiency and cost-effectiveness of the electricity service.

#### **4.2 Risks linked to construction works**

The impact of the construction site on the environment will be managed via the operating manual "The management of environmental aspects during infrastructure construction" prepared by Terna, which is in line with existing Italian regulations.

This operating manual introduces the role of the environmental contact point, a person tasked with monitoring the environmental requirements contained in the legislation and in the opinions of

authorities with responsibility for the environmental, as well as compliance with legal obligations. The environmental contact point also monitors the indications set out in ISO 14001 certification, relating to complaints/reports, environmental accidents, waste, and the consumption of energy and natural resources.

Special attention is to be paid to the identification of areas and access roads to sites which, if compatible with technical and design requirements, are located in areas of reduced natural importance. On completion of the construction work, the areas concerned are restored to their original state. If these areas regard natural or semi-natural habitats, in addition to the normal restoration works, specific interventions are implemented, based on natural engineering techniques, such as re-naturalization, aimed at creating environments suitable for species or plant and/or animal communities (habitat reconstruction); native live plants, which do not require irrigation or special fertilization, materials, even if only inert; infrastructure; and other measures designed to provide favorable living conditions for animal species.

The ISO 4001 standard includes also such aspects as prevention of groundwater contamination and limitation of damage to vegetation, the management of accidents, the minimization of atmospheric and noise pollution, the use of vehicles, and the proper management of waste and excavated earth. These aspects have been enhanced on a voluntary basis with additional precautionary principles. Internal audit campaigns regarding construction sites enable any deviation to be identified.

### **4.3 Risks linked to operation**

In terms of environmental impacts of the Proposed Project, the most significant risks do not regard the use of natural resources or the emission of pollutants, but rather the physical presence of power lines and power stations and their interaction with the surrounding natural and man-made environment.

Therefore, the most significant environmental aspects of the sponsors' activities, in addition to the occupancy of land, will be the visual impact on the landscape, electric magnetic fields, and the effect of power lines on biodiversity, especially birdlife and marine flora.

Greenhouse emissions and hazardous waste are relevant within the context of operations. The sponsors have adopted an Environmental Policy that sets out their commitment to containing and reducing the environmental impact, which in some cases goes beyond legal requirements, when this does not compromise the protection of other general interests provided for under their concessions.

Protection of the population from exposure to electric and magnetic fields is precisely defined by law. The legislation provides for (i) exposure limits, (ii) safety thresholds, (iii) quality targets. The sponsors will carry out inspections to ensure compliance with the limits laid down by the regulations in force and will seek innovative technological solutions in order to mitigate the impact of magnetic fields. If any complaints or requests are received from competent administrative bodies and authorities, the necessary data to assess the actual exposure to electric and magnetic fields generated by the infrastructure will be provided.

The potential impacts of the Proposed Project on **biodiversity** are twofold. On the one hand, the route of the lines may be a factor in increasing biodiversity and protecting certain species as pylons, with their bases, make it impossible for land to be used for intensive agriculture and constitute "islands" where biodiversity can flourish. On the other hand, their presence has potentially negative effects on biodiversity, in particular on birds and protected areas or areas of natural interests. In order to minimize this kind of risks, special devices will be installed along the sections of lines with frequent bird traffic, which, with their visual impact and the noise they generate when blown by the wind, make the power lines easier to see for bird in flights. For other assets, likes electricity substations, camouflage systems can be created.

**Security and resilience of the electricity system** is one of the main drivers of the Sponsors' objectives. The Proposed Project will be included in their Resilience Plan, which includes a list of maintenance/repair works (including scheduled intervention after an accurate assessment of the state of its components). The tools used to support maintenance activities are subject to continuous innovation, as regards identification of the most suitable intervention (MBI- Monitoring and Business Intelligence, a tool used to support decision making), the scheduling and execution of operations (WFM – Work Force Management) and the adoption of modern aerial inspection techniques for the electricity grid.

## 5. CONSULTATION PROCESS

### 5.1 General consideration

Consultation, which is especially important when new lines are being constructed in a specific area, consists of a voluntary process of prior engagement with local institutions (regional and local administrations, park authorities, etc.) and the citizens of local communities directly affected by the work. This process involves the sharing of the infrastructure development needs with local institutions, a willingness to listen to stakeholder opinions and the search for a shared solution regarding the positioning of new infrastructure or the reorganization of existing structures.

In the context of the Proposed Project, stakeholder and public consultation is an important step that will be completed and improved throughout the Proposed Project cycle, in particular during the preparation of the ESIA, the RAP, and any other potential mitigation instruments.

The main objective of the consultation process is to inform stakeholders about the Proposed Project and its impacts (positive and negative ) and to enable them to articulate their different points of views, concerns and values. This process will ensure greater transparency and accountability in decision-making and in the Proposed Project design.

In that regard, STEG, TERN 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 EIES and the RAP in a way that is technically, socially and economically feasible.

#### Consultations Throughout Project Cycle

	Project Cycle	Method of Consultations and Information	Expected Outcomes
			<ul style="list-style-type: none"> <li><b>i)</b> Awareness about project objectives raised among stakeholders.</li> <li><b>ii)</b> Project affected persons (PAPs) informed about project adverse impacts, mitigation measures and their entitlements.</li> <li><b>iii)</b> Contact information shared with stakeholders.</li> </ul>



1	Project preparation	<p>Public consultations</p> <p>Small group meetings</p> <p>Pamphlets</p> <p>Facebook page</p> <p>Radio</p>	<p><b>iv)</b> Awareness about project impacts raised among stakeholders, and consensus reached, about project benefits.</p> <p><b>v)</b> Public awareness raised, and project benefits understood.</p> <p><b>vi)</b> Shareholders informed, and endorsing the project.</p> <p><b>vii)</b> Safeguards instruments (Environmental and social impact assessment [ESIA] and resettlement Action Plan [RAP] prepared timely, in consensus with PAPs and other stakeholders.</p> <p><b>viii)</b> Grievance redress mechanism prepared in consensus, and timely.</p>
	Project Implementation	<p>Public consultations</p> <p>Small group meetings</p> <p>Pamphlets</p> <p>Facebook page</p> <p>Radio &amp;TV</p>	<p><b>i)</b> Safeguards instruments implemented in consensus.</p> <p><b>ii)</b> PAPs take stock of their entitlements and are not worse off, then before the project.</p> <p><b>iii)</b> Grievances resolved amicably.</p> <p><b>iv)</b> Social risks reduced</p>
	Project Completion	<p>Inauguration ceremony</p> <p>Pamphlets</p> <p>Facebook page</p> <p>Radio</p> <p>TV</p>	<p><b>i)</b> Clients from the private sector, the public sector and households, are informed about the benefits of the project.</p> <p><b>ii)</b> Clients are favorable to the electricity companies, and pay their bills timely.</p> <p><b>iii)</b> Safeguards instruments implemented successfully.</p>

## 5.2 The consultation and participation recommended actions

A Stakeholder Engagement Plan (SEP) with emphasis on information and communication, including an action plan, will be implemented to monitor the Proposed Project, to manage the expectations, to explain the objectives and to mobilize all stakeholders through a participated, transparent and inclusive approach. This approach will allow to collect and to consider all opinions and suggestions in a constructive and realistic manner. The civil society participation to the preparation and implementation of the SEP will help reduce the exclusion risks mentioned by art. 32 of the Tunisian New Constitution on the right of access of the public to information and participation. Civil society's participation is also requested by the Regulation 347/2013 of the European Union ratified by the Italian Ministry of the Economic Development that provides for a mandatory public consultation to the projects with environmental and social impacts. When funded by financial institutions, the public consultation must respect their safeguard policies.

The mitigation actions resulting from the ESIS and the technical studies will be integrated in the SEP and they will be the structural base of the information to be communicated and discussed with the stakeholders.

Similarly, after the identification of landowners and entities having right to compensation due to land expropriation (if any), the Sponsors will organize meetings with them to exchange information and reactions. Proposals and suggestions will be registered, analyzed and, when reasonable, included in the future of land acquisition (RAP - Resettlement Action Plan). Before its finalization, a workshop will be organized where the chosen actions will be presented to the stakeholder for discussion and validation.

The activities involving the affected population of both Countries are summarized as follows:

- 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, focused on the project, its local, regional, and national impact, the risks it entails and recommended corrective measures;
- 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 the work. The topics include the procedures followed and stages involved; PAP rights; redress mechanisms; procedures for determining compensation amounts (unit prices; criteria, land requirements, and other subjects that may arise during the meetings);
- 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;
- Open houses for affected populations, civil society representatives and local elected officials, as well as 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, 3 open houses will be held during the project preparation period, starting with the launch of studies, during which STEG, TERN and ELMED will listen, provide information and document participants' demands and 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.

These activities, intended for stakeholders directly affected by the project, would facilitate becoming better acquainted with them and their actual problems and priorities, and more especially, would involve them in problem solving. These activities would also facilitate learning from experience and making adjustments when feasible. They will be supplemented with communication and information actions targeting the general public, the media and elected officials, to raise their awareness of the importance of the social and economic implications of this project for the affected regions in both countries, and for the two countries in general. The activities are grouped by topic in the following action plan.

## Action Plan for Implementation of the SEP<sup>2</sup>

Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected outcomes
<b>General awareness-raising campaigns</b>	Information meetings on the project, its objectives, risks and advantages and its implications	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 for both Tunisia and Italy.	ELMED or any other institution recruited by STEG and TERNA in collaboration with the focal points	Detailed minutes, including recommendations and suggestions per meeting
<b>Information campaigns focused on real property and land purchase issues</b>	Information meeting on real property issues and related implications: acquisition, compensation, procedures, redress mechanism. For Tunisia, the possibility of additional meetings with women	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 for both Tunisia and Italy	ELMED or specialized entities recruited by STEG and TERNA in collaboration with the focal points	Detailed minutes, including recommendations and suggestions per meeting and for each country

<sup>2</sup> Information and data will be gender disaggregated.

Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected outcomes
<b>Information campaigns focused on environmental issues</b>	Information meeting on environmental issues and related implications: Permanent and temporary consequences, risks, mitigation procedures. For Tunisia, the possibility of additional meetings with women.	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 for both Tunisia and Italy	ELMED or specialized entities recruited by STEG and TERNA in collaboration with the focal points and experts from the environmental ministries of the two countries	Detailed minutes, including recommendations and suggestions per meeting and for each country

Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected outcomes
<b>Communications support</b>	1. Creation of a website in Tunisia and in Italy (STEG and TERNA) providing up-to-date information on 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 and TERNA sites	To be determined	Continually available information and exchanges

Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected outcomes
<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 and TERNA and ELMED	Detailed minutes

Activities	Actions and topics	Audience	Frequency	Date	Place	Implementing entity	Expected outcomes
<b>Consultations for preparation of the EIES and the RAP</b>	Individual and group interviews, questionnaires and focus groups	Affected communities, including fishermen, local and regional authorities, technical entities, particularly experts from the environmental ministries for the EIES and concerned NGOs	At the start and during the preparation of the EIES and the RAP	As soon as the SEP is approved	Project areas in Tunisia and Italy	ELMED or other specialized research firms in the two countries	EIES and RAP with a detailed section on stakeholder participation
<b>EIES and RAP consultation and validation workshops</b>	One workshop for each of the two produced in each country	Affected communities, including fishermen, local and regional authorities, technical entities, particularly experts from the environmental ministries for the EIES and concerned NGOs	Once for each country	Between the last draft and the final report	Project areas in Tunisia and Italy	ELMED or specialized research firms in the two countries	EIES and RAP: Finished products

As indicated in the above action plan, detailed minutes containing the following information will be kept for each launch and each meeting: (i) date and place of the meeting; (ii) nature and objective of the meeting; (iii) subjects addressed; (iv) number of participants and who they represent; (v) problems raised; and (vi) pending issues. Each of the entities responsible for implementing the SEP in the two countries will also be responsible for drafting and submitting minutes, in the week



following the event, to STEG and TERNAL, with a copy to the oversight authority. The latter will ensure that its team participates regularly in these launches and meetings.

In each country, the entity responsible for implementing the SEP, in this case ELMED or its consultants, will be responsible for organizing and managing these events. It will be assisted full-time by an environmental and social focal point at STEG and at TERNAL. It will also participate in the EIES and RAP consultation and validation process.

If the focal point position exists at STEG and at TERNAL, it will be filled by internal appointment with precise terms of reference. If the position does not exist, a formal recruitment process will be undertaken prior to the launch of the studies. The two focal points, individually and in coordination with one another, will be primarily responsible for the participative aspects of communication in terms of the development of topics and the methodology to be used and followed, and will work in close collaboration with ELMED and its consultants. Accordingly, terms of reference will be prepared for the two focal points by STEG and TERNAL or by ELMED, within the following 30 days, to ensure that they are recruited or appointed on time.

In each of the two countries, these specific actions will be supplemented and supported by the creation of two websites, one at STEG and the other at TERNAL, with the possibility of discussing the advantages and risks and the possibility of making suggestions. These activities will be implemented according to the schedule indicated in the action plan.

This action plan will be constantly updated and adjusted as information becomes available and based on any design changes implemented during the project preparation process.

During the project execution phase, the two websites as well as the grievance redress mechanism will remain active to ensure the availability of a constant listening and discussion system.

For all activities intended for the general public, the media and elected officials will obligatorily and necessarily cover the topics of compensation and expropriation, redress procedures, approaches adopted and procedures followed. This will be reflected in the terms of reference that STEG, TERNAL and ELMED will prepare for the specialized enterprises recruited for that purpose. The criteria for the recruitment of specialized enterprises will necessarily include experience in participative communication and the capacity to work with the affected populations. Preparation of the terms of reference will begin as soon as the SEP is approved by the funding agencies.

## **6. GRIEVANCE REDRESS MECHANISM (GRM)**

### **6.1 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, its content and its procedures.

## **6.2 GRM Mechanism**

Based on STEG and TERNAs experience, ELMED Etudes will establish a Grievance Redress Mechanism, whose main objective is to facilitate resolution of various stakeholders' concerns and complaints about the Project. It can also be used by laborers working for the construction enterprises during the implementation phase, although the new ESF of the WB requires a specific GRM for labor.

- This mechanism will be accessible, unbiased and cost-effective
- All grievances received in connection with this project must fall within the context of the project and cannot refer to development problems in general.
- The GRM established by the project does not replace the complainants option of accessing the judicial recourse but is a convenient mechanism for 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 Contractor's ESMP.
- The SEP needs to have information about the contacts points responsible for receiving complaints and responding to them along with the mechanism responsible to resolve issues. STEG, TERNAs and ELMED contact points to receive complaints and responding to them are: XX
- Communities, individuals and other stakeholders who believe that they are adversely affected by a World Bank (WB) supported project may also submit complaints to the WB's Grievance Redress Service (GRS). The project-level grievance redress mechanisms and the GRS ensure that complaints received are promptly reviewed to address project-related concerns. Further, project affected communities and individuals may also submit their complaint/s to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, because of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS),

please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

### **6.3 Receiving and recording the grievances**

Grievances may be lodged by a variety of different means; oral (verbal, phone call), letter, e-mail, audio message, phone message or others). Registration of grievances will start during project preparation and continue till completion.

*During project preparation- Grievances on the Proposed Project can be submitted to the Owners of the project (STEG and TERNA)*

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 a period of about a month. Participants to those meetings are allowed to provide their requests and express their concerns. Every single request will be answered by mail or/and via email within two weeks. Grievances, concerns and suggestions can also be submitted directly by mail or by email to the same dedicated address during all the project cycle. They also can be made on STEG and TERNA's websites. In all instances, answers will be given within two weeks.

The aggregated questions and comments, together with the related answer, are published on STEG and TERNA's websites, 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 websites homepage it will be also possible to access social media profiles on Facebook, Twitter and LinkedIn particularly, which represent a growing opportunity for interaction for the company.

Moreover, stakeholders who require clarifications or want to report an issue can contact the Ethics Committee or the Audit Unit. Contact information (addresses, e-mail, and telephone numbers) can be found and are kept up to date on the website.

### **6.4 Acknowledgement and Registration**

Grievances that are forwarded to or made shall be recorded on a standard grievance form. The name of the localities, the date recorded, the name of the complainant, the name of the person who received the grievance are noted together with the proposed date for resolution. If the grievance is received directly, it shall be recorded directly into the Grievance Form.

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

## **6.5 Site Inspection, Investigation and Resolution**

As necessary, ELMED Etudes shall organize a site inspection to check the validity and severity of the grievance. This inspection shall be undertaken within seven days of receiving the grievance. The assigned individual shall 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 provision of information to clarify the situation, undertaking measures to remedy actual problems or compensate for any damage that has been caused.

In addition, specific problems to the project could be then dealt with during the advancement meetings at ELMED Etudes, or at STEG or at TERNAL, 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 shall be provided to the complainant.

*During Implementation* – Grievances during project implementation can be submitted to the contractor; to the supervision engineer; to ELMED Etudes, or to STEG or and TERNAL. Each actor will follow the grievance procedures established above.

## **6.6 Response**

A formal response detailing how the grievance has been resolved shall be provided to each complainant within 30 days. When resolution is delayed, the complainant shall 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 is satisfied.

## **6.7 Reporting on the GRM**

The Environmental consultant shall 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 should provide an overview of grievances, directly or indirectly related to the project implementation. Additional information should 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, ELMED will nominate a dedicated and well trained person to be in charge of monitoring the GRM.

## **6.8 Awareness raising of the GRM and its dissemination**

Information about the SEP will be disseminated in a simple brochure, written in Arabic for Tunisia and in Italian for Italy, and made available to stakeholders upon approval of the SEP.

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;
- 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 an ELMED or 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 and TERNA and ELMED), with a copy to the project manager at the World Bank.

## **7. CONTACT DETAILS FOR THE PUBLIC**

Pending the establishment of a specific contact, during the Project implementation, the contact will be that of xx

## **8. BUDGET**

The implementation of the SEP needs human and material resources, whose entity depends on the impact of the Proposed Project on the local communities and the number of stakeholders. Before the launch of the technical studies, and specifically of the ESIS, they cannot be properly estimated. A preliminary budget of the communication costs linked to the Feasibility Studies has been included in the PPSD.

Based on the results of the studies, it will be possible define specific actions, the need of equipment and human resources and detail a budget on the following cost items:

- Communication and dissemination;
- Human Resources
- Materials

- Additional Studies
- Monitoring
- Training and technical assistance
- Management Costs
- Contingency

## **9. CONCLUSION**

This communication and stakeholder engagement plan is simple, functional and pragmatic. It is a living document that will be constantly updated as new information becomes available. Successful implementation of the plan will require constant coordination, as it will be implemented in two historically, culturally, socially and economically different countries. A delay or failure – even partial – in one of the two countries could cause a delay or disruption in implementation in the other. It bears repeating, then, that special emphasis must be placed on coordination. It is important to note, however, that the risk will be greatly reduced, as the entity responsible for overall implementation of the SEP is a Tunisian-Italian firm, ELMED, working simultaneously in both countries.

## **ANNEXES**

Annex 1 – Description of the stakeholders (to be completed by the client)

Annex 2 – Stakeholders' classifications (empty)

Annex 3 – Public Grievance Form (example)

## Annex 1 – Description of the stakeholders

At Italian Level

Stakeholder/sub-group	Relevant functions	Role in the project	Power/Influence	Perception of process/inputs
The Ministry of Economic Development (MSE)	Responsible for national energy policy.		High power	High interest in the Proposed Project and its impacts
Region Sicily				
Trapani Province				
Municipalities				



**Annex 2 – Stakeholders’ classification (to be completed)**

**Annex 3 – Public Grievance Form**

<b>Public Grievance Form</b>				
Grievance Reference Number [to be filled in by responsible person]:				
Contact Details	Name			
	Address:			
	Tel.:			
	e-mail:			
How would you prefer to be contacted? Please tick a box	By Post	By Phone	By Phone (? same as precedent)	

STEG, TERNAL and their consultants will also prepare a consultation and communication program describing how the substantive issues will be addressed in a bi-directional manner with government stakeholders, residents of the project area of influence, universities and research institutes, government organizations and citizens.

The meetings will involve representatives of various stakeholders. For each meeting, a report will be made, including the agenda, the list of participants and a summary of the problems (questions asked, answers provided). A leaflet describing the project will be given to the participants.

It is expected that consultation and participation meetings will take place, as appropriate, at several locations in the project areas, particularly where significant impacts (positive or negative) are expected. These locations will be determined once the ESIA and the RAP are initiated.

Specifically, the consultation and communication program will include an information dissemination and project consultation approach in the affected area that ensures:

- a. that men and women and vulnerable groups receive timely and appropriate information to make informed decisions;
- b. consultations are conducted at locations and with groups of people who are informed in terms of interests in the project area;
- c. that the approach itself is accepted by the social groups concerned and their representatives; and
- d. the result are decisions that respond to the interests and concerns of men, women and vulnerable groups in the project area, and advance project objectives.

Before beginning the authorization procedures for their works, TERNAL and STEG will publish a Plan of Public Consultations. Public meetings, referred to as "Terna -STEG Meetings", will be organized in order to meet local communities and explain the need to develop the grid which necessitated the work, explaining the implementation methods, as well as the alternatives that were identified and, above all, being available to receive comments and clarification requests and providing immediate feedback.

Technical meetings ("committees") will be held with the relevant Region(s) for sharing the route. Other relevant institutional stakeholders will be invited to express their concerns. At the end of this "conciliation process", the parties will sign an agreement on the chosen route.

The first public consultation will be planned after the preliminary environmental screening in order to take into consideration the issues that could affect local stakeholders according to the Environmental and Social Assessment.

This means the scheduling of a series of activities, starting from a press conference in which will be specified the scheduling of public meetings with Municipalities, local authorities, communities and other stakeholders. The number of the meetings planned will depend on the results of the preliminary studies (for this reason also the detailed budget will be available later).

During this initial consultation a summary of the proposed project’s objectives, description and potential impact will be provided. When the draft of the Environmental and Social Assessment is available the principal data will be made publicly available and the in-depth consultation will take place.

During the in-depth consultation process (hereinafter referred to as "Terna -STEG Meetings"), stakeholders will acquire, in dedicated sessions, detailed information on the implementation of the project, its objectives and its impacts. A leaflet will also be distributed.

Concerned municipalities and local authorities will receive communication and information concerning the “TERNA-STEG Meetings” dates in advance in order for them to disseminate the information and provide adequate public spaces for the meetings. In each affected municipality, brochures informing about the purpose of the meeting, the date and place will be distributed.

The events will also be advertised on Terna's and STEG’s websites, in two national newspapers and on the local radios.

Generally during such meetings, groups of 10-15 people will be convened along a path where various stands will illustrate all the technical details of the work (regional energy situation and motivation of the work, authorization path and role of municipalities and other concerned local authorities, design elements and site, environmental, social and territorial aspects arising from the realization of the work, forms for collecting observations and questions).

Participants will be encouraged to ask questions and, at the end, to fill in a feedback note.

A dedicated web page will be created to let the public consult the progress made in the preparation and implementation of the project. It will also provide the contact information to use to convey comments, suggestions and objections.

The timing, proposed communication methods and media for each categories of stakeholder are presented below.

Stakeholder/s	Type of communication and Proposed Method	Responsibility	Timing
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<ul style="list-style-type: none"> <li>• People residing (or using land and sea) and owners of businesses operating in project affected areas.</li> <li>• Region</li> <li>• Provinces</li> <li>• Municipalities</li> <li>• citizens</li> <li>• Local entities</li> <li>• other interested parties (including NGOs)</li> </ul>	<ul style="list-style-type: none"> <li>• Information delivered to residents/owners of business through a FIRST PUBLIC CONSULTATION to present the new project and study area examined with the first environmental surveys</li> <li>• Multiple meetings, called “Terna incontra”.</li> <li>• Web site for uploading requests, comments and concerns.</li> </ul> <p>Dedicated mail and email address where comments, concerns and requests can be posted.</p>	<p>Terna and STEG Development Team</p>	<p>Approximately 3 months after the signature of contracts for Terrestrial and Marine Feasibility Studies, but after the Contract with the ESIA Consultant has been signed.</p> <p>Note: ESIA and RAP Consultants should participate in these Public Consultation Meetings, since what is being discussed and agreed on will affect their work program. Minutes of meetings and signed attendance sheets should part of the ESIA and RAP reports.</p>
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<ul style="list-style-type: none"> <li>• People residing (or using land and sea) and owners of businesses operating in project affected areas.</li> <li>• Ministry of Economic Development</li> <li>• Region</li> <li>• Provinces</li> <li>• Municipalities</li> <li>• citizens</li> <li>• Local entities</li> <li>• other interested parties (including NGOs)</li> </ul>	<p>SECOND PUBLIC CONSULTATION after the completion of the Feasibility Studies, the Draft Final ESIA and RAP requested by the World Bank</p> <ul style="list-style-type: none"> <li>• Opening Press Conference</li> <li>• Multiple meetings, called “Terna incontra”.</li> <li>• Web site for uploading requests and concerns.</li> </ul> <p>Dedicated mail and email address where comments, concerns and requests can be submitted.</p>	<p>Terna – STEG Development Team</p>	<p>Approximately 1 year after the 1<sup>st</sup> Public Consultation, but after the Draft Final ESIA is available because this Public Consultation is on the Draft Final ESIA Report.</p>
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<p>Relevant National and Provincial Level authorities:</p> <ul style="list-style-type: none"> <li>• Ministry of Economic Development</li> <li>• Ministry for Environment, Land and Sea Protection</li> </ul>	<p>REQUEST FOR PROJECT PERMITS</p>	<p>Terna – STEG Development Team in collaboration with ESIA Consultants</p>	<p>After the completion of the second public consultation</p>
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<p>Relevant authorities:</p> <ul style="list-style-type: none"> <li>• Ministry of Environment, Land and Sea Protection</li> <li>• Commission for Architectural and Landscape Heritage</li> <li>• Ministry of Health</li> <li>• Ministry of Infrastructure and Transport</li> <li>• Ministry of Cultural Heritage and Activities and Tourism</li> <li>• Ministry of Defense</li> <li>• Ministry of Foreign Affairs</li> <li>• Municipalities of Region Sicily</li> <li>• other interested parties (eg ENEL Distribution, RFI, ANAS, SNAM RETE GAS, owner of exploration permits on the sea bed, etc.).</li> </ul>	<p>TECHNICAL MEETINGS</p>	<p>Terna – STEG Development Team and ESIA and RAP Consultants</p>	<p>During the authorization process (and, if necessary during the carrying out of the Feasibility Studies, the ESIA and RAP in case of critical issues)</p>
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### 1.1.The public consultation and the authorization process: planned activities

The following list provides a brief explanation of the process which will be followed up by TERNA and STEG from the signature of contracts for feasibility studies up to the permit granting:

1. About 3 months after the signature of the Feasibility Studies contracts, but after the Contract with the ESIA Consultants has been signed, TERNA and STEG will hold the first Public Consultation on the TOR for the ESIA, to present the new project and preliminary corridors and to request feedback on concerns from affected parties. ESIA and RAP Consultants should participate in these Public Consultation Meetings, since what is being discussed and agreed on affects their work program. Minutes of meetings and signed attendance sheets will be part of the ESIA and RAP reports;
2. As the "Italy-Tunisia" project is a candidate for the inclusion in the third PCI list, in case of positive result, Terna will be compliant with the requirements and procedures of the Reg.347/2013. That implies the conduct of a mandatory public consultation phase to be approved by the Ministry of Economic Development. Therefore, Terna will transmit to the Ministry of Economic Development a public participation and consultation plan on the results of the Feasibility Studies;
3. After the formal approval by the Ministry, the consultation plan can start to be implemented;
4. Terna sends the results of the public consultation to the Ministry of Economic Development and to the Ministry for Environment, Land and Sea Protection and submits the application for project permits pursuant to the combined provisions of the Decree Law 29/08/2003 n.239, converted with modifications in Law 27/10/2003 n.290.
5. The Ministry approves the consultation results and starts up the permit procedure. Upon receipt of the documentation, the Ministry of Economic Development verifies the completeness of the submitted documentation and notifies the start-up of the permit procedure to the relevant competent bodies and authorities for the purpose of receiving their opinions.
6. Terna will publish the Notice to the Public of the opening participation in the administrative procedure in newspapers, local radio and on public notice board (called "Albi Pretori").
7. In addition, Terna will require the opinions, assent and no objection of the relevant authorities, including the Municipalities, the Commission for Architectural and Landscape Heritage (landscape constraints) and the Commission for Archaeological Heritage (archeological constraint ), the Ministry of Health (Electromagnetic Fields), the Region -

Environment Directorate (Evaluation Impact Assessment), State Forestry Authority (hydrogeological constraint), Basin Authority (hydrogeological risk), Ministry of Infrastructure and Transport (Supervision structure on motorway dealers) and other interested parties (eg ENEL Distribution, RFI, ANAS, SNAM RETE GAS, owner of exploration permits on the sea bed, NGOs, etc.).

8. Once the publication phase is over, the Ministry of Economic Development will convene the Conference of Services (“Conferenza dei Servizi”, CdS), as per Art. 14-bis of L. 241/1990, where all the subjects involved in the work are called to express their opinion on the project.
9. Based on the positive results of the Conference and the formal assent given by the affected Regions, the relevant Ministries will proceed with the permit granting.

#### 1.2. Project preparation and application for project permits

Based on the results of Feasibility studies, ESIA, RAP and especially on outcomes of the consultation process, Terna will prepare the preliminary project of the interconnection with Consultants’ support. The whole documentation will serve for the permit application to competent authorities (Ministry of Economic Development and Ministry for Environment, Land and Sea Protection). In particular, the documentation will be organized as follows:

1. A Work Plan (“Piano Tecnico delle Opere”, PTO): a document consisting of a set of reports, which take into account the results of Stakeholder consultation (ex. Illustrative technical report, Fire report, Geological report, town-planning scheme of the interested municipalities, etc..).
2. Specialist reports concerning the analysis and description of environmental constraints potentially impacted, attached to the PTO (such as: Landscape Report, Archaeological Report, Impact Assessment Report if necessary).

## 6. RESOURCES AND RESPONSIBILITIES

In the current state of progress, the main stakeholders involved in the implementation of the SEP aspects are:

- STEG and TERNA as owners of the Proposed Project. STEG and TERNA, by means of their Tunisian joint-venture, ELMED Etudes Sarl, are responsible for the implementation and monitoring of Project activities to ensure they are consistent with the requirements of the ESMP. STEG and TERNA will provide ELMED

Etudes with all the resources and support necessary to ensure that the ESMP requirements, including the SEP, are met;

- ELMED Etudes Sarl
- Consultant to support with SEP: ELMED Etudes will be hiring a consultant to implement the SEP during the Project implementation, including the above-mentioned consultations and submission of the required consultation reports.
- TERNA and STEG will both nominate or hire a focal point to be in charge of the coordination with and the monitoring of ELMED and its consultants in charge of the preparation and implementation of the SEP, the RAP and the ESIA.

The Project owners shall be responsible for the execution of the ESMP measures. The consultant to be hired shall be a qualified environmental and social professional with experience in similar projects, including ensuring compliance with requirements of EHS. The consultant will be in charge of the supervision, control and monitoring, and its monthly reports to ELMED Etudes will contain a section on safeguards compliance of the Project.

ELMED will be responsible for the implementation of the SEP. Its main responsibilities will include:

- Manage the implementation, including the preparation of consultation materials, the implementation of the consultations, the review of finding from the consultations, and the integration of relevant findings into project implementation;
- Keep abreast of attitudes, expectations, and problems occurring within the communities;
- Carry out an internal and external communication system (with communication actions);
- Periodically update the SEP, as needed; and
- Provide feedback on the implementation of the SEP, including submitting inputs to regular reporting of ELMED Etudes to the World Bank.