Voltalia- Menzel (51664)

Project Basic Information

Country: Tunisia	Region: North Africa and Horn of Africa	Project No.: 51664
Project Legal Name: Voltalia- Menzel	Company Legal Name: Menzel Solar Plant	
Project Business Sector: V-BF - Solar - Renewable Energy Generation	Owning Department /Division: Regional Industry - INF Africa	
Environment Category: B		

IFC's Disclosure Requirements

Date of initial ESRS disclosure
11/17/2025

Date of revised ESRS disclosure

Date of clearance by client for factual accuracy
11/7/2025

Board Approval Date

Project Description

The proposed investment seeks to support a 130MWp solar photovoltaic ("PV") project in Tunisia (the "Project") which was awarded in 2024 by the Government of Tunisia, following a competitive tender to Voltalia ("Voltalia" or the "Company"). Voltalia is a France based renewable energy company headquartered in Paris. The Project Company, a special purpose vehicle, Menzel Parc Solaire (" MPS") is registered locally.
The project will consist of (i) a utility grade grid-connected PV array power system; (ii) a 200m new Overhead Transmission Line (OHTL); and (iii) upgrade and connection to an existing 145km OHTL. The power system will consist of approximately 185,000 N-type TOP with double-sided double glazing panel installed on a horizontal single-axis beam tracker with 60o tilt. Preliminary design indicates that the plant will include string inverters stations, converting direct current from the panels to alternating current, and a substation, converting to appropriate voltage for connection directly to the national grid with no storage batteries required.
Connection to the grid will be through a new 200m OHTL that will connect to the existing 145km OHTL via a Loop-In Loop-Out (LILO) connection. The 200m OHTL will be constructed on project land. The 145km OHTL connects to the Bouchamma and Mdhilla substations. The 145km OHTL will be upgraded from 150kV to 225 kV voltage capacity and the upgrade works consist only of changing isolator on the towers, as the existing cable is deemed adequate for a voltage of 225kV and additional power. The existing 145km OHTL is owned by the Société Tunisienne de l'Electricité et du Gaz (Tunisian Company of Electricity and Gas – "STEG") and has been in operation for more than 40 years by the latter.
The power plant will also include ancillary structures such as an office and data control building, warehouses and workshops, and internal roads. The plant will be completely fenced. Access to the site is via the existing regional road, RN15 connecting to an existing untarred access track of 4km. The access track was used mostly by the landowner to access the site. The project is still in the design stage and is expected to be completed within 18 months after groundbreaking under a turnkey, fixed price Engineering Procurement and Construction ("EPC") contract. The selection of the EPC contractor is in process and construction activities are expected to commence in Q1 2026. MSP is expected to operate the plant for 25 years and then hand it over to the Government of Tunisia as per the Power Purchase Agreement (PPA).
The proposed project site is located in the Gabes Governorate in the delegation of Menzel Habib and within El Mehemla sector. The nearest community to the project site is El Mehamla village, located 2.3 km to the north from the project site. The town of Menzel Habib lies 11 km away, while the city of Gabes is situated 70 km from the solar PV plant. The project will be established on a 200 hectares plot that belongs to a private owner, under one land title. The land is leased from one landowner under a willing lessee, willing lessor arrangement. The plot is uninhabited, free of any structures and was being used for herding activities by the owner. MSP will lease the plot for a period of 25 years. For the 200m new OHTL, it will be constructed within the perimeter of the project site, which will be under the same lease agreement. As for the existing 145km, it has an established 14m (each side) legal Right of Way (RoW). No changes to the RoW are planned as part of this project, hence no further land acquisition will be required for the existing OHTL as per the defined requirement of STEG.
The project is expected to employ approximately 450 workers, of whom 100 would be skilled and 350 unskilled, during the peak construction phase. During the Operation and Maintenance ("O&M") phase, the plant will be operated by MPS, and likely to employ around 20 employees working in shifts. The E&S policies and procedures at the level of the Project Company will reflect those of Voltalia.

Overview of IFC's Scope of Review

IFC's Environmental and Social (E&S) review included a 4-day site visit (26-29 August 2025) to the project site, Bouchemma Substation, existing OHTL, and Sidi Mansour Ramsar Site. The visit involved meetings with key stakeholders, including surrounding communities of El Mehamla, the Governors of Gabes and Menzel Habib, and several national agencies (waste, agriculture, forest protection, environmental protection, STEG, archeology, and cultural heritage). The company's ESIA consultant team also participated, providing updates on the ESIA and project development.
IFC's appraisal focused on the company's capacity to manage E&S risks and comply with Tunisian regulations, IFC Performance Standards (PSs), and World Bank Group Environmental Health Safety (EHS) Guidelines. Documents reviewed included: (i) company and MSP capacity to manage ESHS risks; (ii) ESIA and supporting documents; (iii) HR policies and procedures, especially on working conditions, employment terms, and OHS for staff, contractors, and primary labor supply chain issues (e.g., forced and child labor); (iv) land acquisition and RoW surveys; (v) community health, safety, and security policies; (vi) stakeholder engagement plan, including early engagement with communities and stakeholders; (vii) baseline social and biodiversity conditions on the OHTL; and (viii) cultural heritage.
Voltalia is an existing IFC client. IFC's appraisal also considered their E&S performance on existing investments under supervision (link to project disclosure below). The company's E&S performance for these projects has been satisfactory. The company's existing projects in IFC portfolio include:
o https://disclosures.ifc.org/project-detail/ESRS/45644/karavasta-solar
o https://disclosures.ifc.org/project-detail/ESRS/35467/adenium-jordan-zahrat-al-salam

Identified Applicable Performance Standards

While all Performance Standards are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards.

PS1-Assessment and Management of Environmental and Social Risks and Impacts
PS2- Labor and working conditions
PS3-Resource Efficiency and Pollution Prevention
PS4-Community Health, Safety and Security
PS6-Biodiversity Conservation and Sustainable Management of Living Natural Resources
PS8-Cultural Heritage

Environmental & Social Categorization and Rationale

This is a Category B project according to IFC's Policy on Environmental and Social Sustainability as the Environmental and Social ("E&S") impacts associated with the project are limited, generally project-specific and can be addressed through the implementation of good international industry practices. Furthermore, it is possible to design and implement engineering and management measures to mitigate adverse impacts during construction and operation. The environmental and social risks are moderate and for those that have been identified, the client's ESHS management system and the agreed E&S Action Plan ("ESAP") provides appropriate mitigation.

Environmental & Social Mitigation Measures

(Observations that are not to be disclosed must be recorded in ESG360)
IFC's appraisal considered the environmental and social management planning process and documentation for the Project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in the paragraphs that follow and (if applicable) in an agreed Environmental and Social Action Plan (ESAP). Through implementation of these measures, the Project is expected to be designed and operated in accordance with Performance Standards objectives.

Applicable PSs summary
PS1 - Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social Policy and Management System
At the corporate level, the company has policies on health, safety, environment, social (HSES), sustainability, ethics, and human rights, demonstrating its commitment to quality, injury and illness prevention, reducing environmental pollution, and ensuring compliance with statutory and regulatory requirements. These policies align with IFC PS requirements and apply to all Voltalia projects, including Menzel Habib. They will be shared with all project personnels, including contractors. Therefore, MSP is not expected to develop its own policies but adopt Voltalia's and, where needed, develop project-specific procedures and plans.

Voltalia has a corporate HSES management plan defining process to identify and manage HSES risks, including mandatory requirements for MSP and contractors (detailed in its 'HSE Minimum Requirements'). This plan will guide EPC and O&M contractors, who will be contractually required to develop project-specific Environmental and Social Management Plans (ESMPs) aligned with Voltalia's E&S policies. Together with ESIA provisions, the corporate plan outlines requirements and standards underpinning the project's ESMPs. As per ESAP#1, MSP will develop and implement a project-level HSES management plan detailing processes and standards for construction, ensuring adequate E&S management and supervision. It will require EPC and O&M contractors to implement a project-specific EHS/OHS management system and ESMPs in line with IFC PSs, WBG EHS Guidelines, Voltalia policies, and ESIA provisions. Voltalia/MSP will review and approve all plans before construction starts.

Aligned with corporate policies, the company has developed procurement and contractor/supply chain management procedures setting minimum requirements to integrate E&S obligations into contracts. These requirements, aligned with IFC PSs and the Contractor Management Guidance Note, have been included in all RFPs and the draft EPC contract.

Identification of Risks & Impacts
The company developed an ESIA in accordance with local legislation, IFC PSs and WBG EHS provisions and guidelines, and good international practice. The ESIA assessed all relevant baseline conditions (e. g. air quality, noise, traffic, biodiversity, etc.), analysis of alternatives, climate change risk assessment, impacts along with relevant mitigating measures and expected residual impacts once mitigants are implemented, and a framework ESMP. As outlined above, the project includes a 200m OHTL that will be built and operated by Voltalia, which will connect to the existing 145km OHTL. The 200m OHTL will be constructed within the project site. The ESIA also included the baseline condition and impact due to the upgrade of the existing OHTL. The project ESIA was disclosed via multiple meetings with all stakeholders and selected focus groups in August 2025 within the nearby communities of El Mehamla and Menzel Habib. Flora, Fauna and Avifauna fatality surveys were carried out over various periods (refer to PS6) to assess baseline and expected impacts on biodiversity.

To address E&S risks in procurement and supply chains (refer to PS2), Voltalia has implemented structured processes, including vendor prequalification and selection procedures, a PV Module Supply Chain Risk Assessment, an Ethics Guide, and a Code of Conduct that defines Voltalia's E&S commitments (including those related to labor practices and human rights). These commitments are integrated into all contracts signed with suppliers.

Management Programs
As part of the ESIA study, a framework ESMP has been developed, which provides a summary of the E&S management plans, monitoring requirements and mitigation measures applicable to the construction and operation phases of the project. As per ESAP#2, the EPC and O&M contractors will develop a Construction Environmental and Social Management Plan ("CESMP") and Operation Environmental and Social Management Plan ("OESMP"). The CESMP and the OESMP will be based upon the ESIA framework ESMP, the project-level HSES management plan, Voltalia's E&S policies, IFC PSs requirements. The latter plans will be reviewed and approved by the Lenders prior to use. Construction and operations phase E&S management and monitoring will be shared between the company and EPC/O&M contractors, who will be contractually bound to fulfill their ESMP responsibilities.

The CESMP will comprise a series of sub-plans, including but not limited to: waste management; pollution prevention (covering emissions, spill response, etc.); water management (covering supply, treatment, disposal, etc.); stormwater management, hazardous materials; emergency preparedness and response; community health, safety, and security; road safety and traffic control; accommodation management; local recruitment and labor management; influx management; environmental monitoring plan; stakeholder engagement (including grievance handling); contractor management plans; gender-based violence and sexual harassment, and biodiversity management plans. As for the OESMP, it will consist of a suite of sub-

plans, which will include but not be limited to: waste management; pollution prevention (including emissions, spill response, etc.); water management; hazardous materials; emergency preparedness and response; community health, safety and security; road safety and traffic management; biodiversity management including reptiles and pest management; environmental monitoring plan and stakeholder engagement (including grievance management).

With respect to the 145km OHTL, upgrade works will be carried out over a period of 2-3 months during the winter season. The OHTL will have to be de-energized by STEG for works to proceed, hence requiring close coordination between STEG and MSP. As per ESAP#3, the project will establish an EHS/OHS coordination procedure with STEG aimed at achieving compliance with the IFC PSs during construction and operations of the OHTL. The procedure will detail the type and frequency of the engagement and the proposed steps the project will take to ensure STEG and its selected EPC and subcontractors comply with relevant PSs standards and WBG General and sector specific EHS guidelines. This procedure will further detail the need for developing intervention plans considering HSES of workers as needed for the upgrade works.

Organizational Capacity & Competency
The company has at a corporate level an E&S Head, that has overall responsibility for the project's ESHS and OHS management. The E&S head is supported by an Europe+ regional E&S Advisor. The company has good capabilities to manage a range of ESHS and OHS issues as well as understanding of IFC and international best practice provisions and standards. At the project level, MSP intends to hire a local E&S Coordinator and EHS resources, and a dedicated local Community Liaison Officer. The EPC and O&M contractors will be required to have qualified personnel to oversee all E&S issues including an EHS manager, and EHS/OHS officers based on the size of the workforce.

As per ESAP#1, the company will finalize the project related EHS organogram for both MSP and the selected EPC and O&M contractors before start of construction.

Emergency Preparedness & Response
The company has developed a corporate Emergency Preparedness and Response ("EPR") procedure that sets out minimum requirements and guidelines for the identification and response to possible emergency situations. The corporate HSES management plan further outlines the requirement for this plan to be fully developed by the selected EPC contractor. As per ESAP#2, Voltalia/MSP and the EPC and O&M contractors will develop a project specific EPR plans in accordance with IFC PS1 and PS4 provisions.

This plan will cover preparedness and responses to a range of potential emergency scenarios including but not limited to: medical emergencies (including on-site injuries, pandemic type outbreaks, snakes and scorpion bites); fire, extreme weather conditions such heatwaves and floods; transport incidents and major hydrocarbon spills. Security related incidents, acts of sabotage/vandalism, terrorism etc. will be addressed with a separate Security Management Plan (ESAP 9 see below). The response plan will include a communication protocol to alert local authorities, communities as appropriate, as well as the management team in addition to specific responses and evacuation procedures. Regular drills and emergency training and exercises will be developed.

Monitoring & Review
The company will be responsible for reviewing and formally auditing their contractors with regards to their HSES performance and compliance against project standards, national requirements and IFC PS. As part of its project level HSES management plan (ESAP#1), MSP will establish specific procedures, based on corporate guidelines and framework, and allocate resources to monitor and measure the effectiveness of theirs and their contractor's management plans / programs as well as compliance with relevant Tunisian legal requirements. E&S / OHS monitoring requirements of the EPC contractor for their own activities and that of their subcontractors will be defined within their management plans (ESAP#2) and approved by Voltalia/MSP. The implementation will be closely followed by the company during construction activities.
The project-level HSES management plan will also outline the minimum monthly reporting requirements of the EPC contractor. These reports will include coverage of the contractor's E&S / OHS performance in accordance with reporting requirements outlined within the project ESIA, ESMPs and IFC PS requirements. Clear Key Performance Indicators ("KPIs") will be developed as part of the reporting.

Voltalia has a Contractor and Supply Chain Procedure in place specifying selection, contractual agreements, auditing, monitoring and supervision requirements for contractors and suppliers. The company will implement the requirements outlined in these procedures at the project level; in particular, covering child, forced labor, and significant safety issues requirements.

PS2 – Labor & Working Conditions
The project is expected to employ up to 450 workers during the 18-month construction peak, including 100 skilled and 350 unskilled laborers, most will be engaged by the EPC contractor and sub-contractors. The workers are expected to come from the surrounding communities. A few expatriates may be retained for oversight and specialized construction. Given strong expectations for local jobs, Voltalia/MSP will coordinate with the EPC contractor and local authorities to maximize and fairly manage community recruitment. Around 20 workers will be employed during the project's O&M phase.

Human Resources Policies and Procedures
Voltalia maintains group-level Human Resources (HR) policies broadly aligned with IFC PS2, covering recruitment, rights, obligations (including non-discrimination and equal opportunity), freedom of association, collective bargaining, and grievance mechanisms. Key documents include the Ethics Guide & Code of Conduct and the Group Diversity, Equity & Inclusion Policy. Voltalia also enforces a Human Rights Policy that commits to rejecting child and forced labor, discrimination, harassment, abuse, or violence, while promoting equal opportunities. These policies apply to all Voltalia subsidiaries, contractors, and workers, and will be implemented for this project.

As per ESAP#4, MSP will prepare for both construction and operations phases project-specific "Worker's Handbook". The Worker Handbook will include (i) Labor Policy statements addressing non-discrimination, equal opportunity, prevention of child and forced labor, freedom of association, and prevention of Gender-Based Violence and Sexual Harassment ("GBVSH"); (ii) HR procedures, including local recruitment, with measures to promote gender equality; worker induction; terms and conditions of employment; disciplinary actions (including GBVSH-related); and workforce demobilization post-construction; (iii) Workers' Code of Conduct emphasizing respectful behavior in host communities and zero-tolerance for GBVSH; and (iv) Labor Grievance Mechanism (including contractors and third-party workers) enabling receipt and resolution of optionally anonymous grievances, including a separate gender-related issues like GBVSH and discrimination, handled sensitively and confidentially. These HR policies, procedures, Code of Conduct, and Grievance Mechanism will apply to all project workers, including those employed by contractors and sub-contractors (e.g., security providers), and will be translated into French and Arabic (or as relevant), easily accessible, and clearly communicated during induction and through sensitization and training. MSP will also ensure the EPC and O&M contractors' processes fully align with these policies and that the HR function is adequately staffed with experienced personnel.

No workers' accommodation camp will be set up during the construction phase as the project intends to hire from the surrounding communities. If needed, workers will be accommodated in the surrounding villages. As part of its project-level HSES management plan (ESAP#1), MSP will develop an overarching Accommodation Management Procedure that will articulate the minimum requirements for workers accommodation including provision of basic services and welfare facilities, consistent with PS2 requirements and the IFC/EBRD guidance note on Workers Accommodation: Process and Standards. These provisions will guide, if necessary, the development of a project specific accommodation management plan by the company or its contractors or subcontractors (ESAP#2) should workers be accommodated in the surrounding villages. MSP will require its EPC and O&M to develop a transportation management plan assessing and addressing the risks associated with transporting workers to and from the worksite (ESAP#2).
Working Conditions and Term of Employment
The project will ensure that all employment contracts comply with Tunisian labor codes and IFC PS2 requirements. Every employee (including those hired by contractors and subcontractors) will receive a contract in French/Arabic specifying terms of employment, working conditions (including health and safety standards), wages and benefits, working hours, overtime arrangements and compensation, annual and sick leave, vacation, holidays, and other statutory leaves. Contracts for construction-phase workers will clearly state the short-term nature of the project and indicate the expected employment duration.
In line with ESAP#4, Voltalia/MSP will establish a project-specific policy affirming that workers will not be restricted from joining unions or other workers' organizations. This applies to both direct and third-party workers during construction and operations phases. The project will ensure that child or forced labor is never employed at any stage. The company will enforce contractual provisions with contractors and suppliers, including verification of identification and age.

Occupational Health and Safety(OHS)
Key OHS risks for the Menzel Habib project include slips and falls, hazards from moving machinery on-site, heavy lifting, traffic accidents, exposure to electric shocks and burns, bites from venomous snakes and scorpions and safety concerns during panel module assembly. Voltalia corporate HSES management plan

covers various mentioned aspects, such as: a robust training program for staff and contractors; Job Safety Analysis and Risk and Hazard Assessment with related management procedures; PPE requirements; Permit to Work System; Lock Out-Tag Out System; OHS signage standards; medical support provisions; rest and welfare facilities; access protocols; induction and refresher Toolbox Talks; incident reporting and investigation; and performance monitoring. As part of ESAP#1, MSP will put in place similar requirements within the project-specific HSES management plan and will further include provisions to manage project-specific risks such as presence of venomous reptiles and high outdoor temperatures and further ensure these are included in the CESMPs and OESMPS(ESAP#2).

EPC and O&M contractors will also be contractually obligated to deploy an adequate number of qualified Health and Safety ("H&S") supervisors to ensure compliance with contractual OHS provisions. A H&S Committee comprising worker representatives will be established to provide feedback and recommendations on safety matters, in line with Tunisian regulations. An OHS plan and related procedures will also be prepared for the operation and construction phases (ESAP#2). As per ESAP#5, Voltalia/MSP will implement strict monitoring requirements, including third-party audits during both construction and operations, to ensure contractors and subcontractors maintain compliance with national laws, employer labor standards, and PS2 provisions. The monitoring frequency will be quarterly throughout the construction phase and semi-annually in the first two years of operations.

Labor risk within the supply chain
To manage E&S risks in procurement and supply chain, Voltalia has formalized processes, including vendor prequalification and selection, a PV Module Supply Chain Risk Assessment, an Ethics Guide, and a Code of Conduct defining Voltalia's E&S commitments (including labor practices and human rights). These commitments are incorporated into supplier contracts. The Code of Conduct (CoC), aligned with IFC PSs, requires adherence to host country regulations and internationally recognized standards. These processes describe how i) supply chain mapping is undertaken; ii) Third Party Risk assessment and background checks are conducted (covering risks such as forced labor, child labor, and labor conditions); and iii) follow-up assessments are implemented, including monitoring to track due diligence and risk management effectiveness.

Additionally, short-listed suppliers must provide a list of key component sub-suppliers to assess potential risks. Voltalia also maintains a list of approved suppliers and sub-suppliers which EPC and O&M contractors will be allowed to work with. The PV module suppliers are also required to sign a forced labor declaration form to comply with Voltalia's CoC and E&S standards. Similarly, key component sub-suppliers are also required to sign the same forced labor declaration form to confirm that all contracting practices are in accordance with the local laws and international labor standards. Voltalia/MSP reserves the right to terminate its contracts with any suppliers that repeatedly do not comply with the material obligations of the CoC. Voltalia/MSP will require their EPC supplier/s to engage an independent, reputable and experienced third-party consultant, to conduct an audit of their respective supply chain. This audit will be undertaken to verify labor and working conditions' compliance with the local regulations and international best practices. The audit report and any suggested corrective actions will be made available to IFC (ESAP#6).

PS3 – Resource Efficiency & Pollution Prevention

Resource Efficiency – Greenhouse Gases
Greenhouse gas emissions during construction are expected to be minimal, mainly from fuel use in generators, transport, on-site equipment, and machinery. Although quantities have not been calculated, they are expected to be low and well below 25,000 tCO2eq/year. The Project is expected to provide around 200 Gigawatt Hour (GWh) of electricity per year and, it is estimated to result in about 126,000 tCO2eq/year GHG emission avoidance.

Resource Efficiency – Water Consumption & Availability
Estimated water requirements are 5,500m³ during construction and 10m³/month during operations. Water during construction will mainly be for dust suppression, concrete production, minor batching for substation, control and admin buildings, and domestic use. Consumption will be accurately quantified once key elements (e.g., batching, worker accommodations) are defined. During O&M, water use will focus on panel cleaning, prioritizing dry brush-cleaning. Wet cleaning may be needed when dust adheres due to rain or humidity, estimated at no more than four times per year.
At appraisal, the construction water source was not identified. The ESIA includes a sustainability review of groundwater use, concluding minimal aquifer depletion risk due to low demand. As per ESAP#2, MSP will develop a Water Management Plan for construction and operations, based on ESIA findings and

sustainability assessment. The plan will ensure efficient water use, especially for panel cleaning, and outline monitoring procedures. It will detail potable/non-potable water quality, sustainable sourcing, resource efficiency measures (e.g., water-saving taps), training, KPIs, roles, and protocols for monitoring water quality in storage tanks.

Pollution Prevention
During construction, minor and insignificant pollution to air, water, and soil, and increased noise levels are anticipated; these can be mitigated through standard pollution prevention measures outlined in the different environmental management plans. Wastewater will be collected in impermeable tanks and transported by a licensed contractor to the nearest municipal treatment plant. During operations, no significant pollution impacts are expected except wastewater from panel cleaning and regular household waste. The company will implement pollution prevention measures per national law, IFC PSs, and ESIA provisions.
The project will generate non-hazardous waste (paper, wood, plastic, scrap metals, glass) and limited hazardous waste (transformer oils, paints, batteries, electronic waste). Overall volumes during both phases are expected to be low. As per ESAP#2 and 1, MSP and EPC/O&M contractors will develop a waste management plan aligned with local laws, Voltalia HSES guidelines, IFC PS3, and WBG EHS provisions. The plan will commit to waste reduction, maximize reuse/recycling, and outline processes for storage, segregation, tracking, transport, and disposal/treatment. It will include full waste traceability, third-party selection criteria, management of broken/expired PV panels, hazardous storage requirements, disposal solutions per good international practices, and ensure hazardous waste contractors are licensed.. As part of the project-level HSES management plan (ESAP#1), each licensed facility will be assessed for suitability to ensure safe disposal/treatment for human health and the environment.

Pollution Prevention – Hazardous Materials
Hazardous materials during construction and operation include hydrocarbons, oils, lubricants, and paints.. An impermeable storage area with restricted access will be established onsite as required by local legislation. A project-specific hazardous material and spill prevention management plan is developed for both phases by the EPC and O&M, based on the existing corporate hazardous material management policy (ESAP#2). The plan will cover transport, storage, refueling, emergency response, community awareness, training, inspections, maintenance, monitoring, reporting and compliance with national legislation and align with IFC PS3 and WBG EHS Guidelines.

Stormwater management
The southwestern boundary of the project site is bordered by a seasonal water stream, which typically flows for three to four weeks per year during particularly wet seasons. A hydrology study was conducted as part of the project design, identifying flood risks along both the southeastern and southwestern boundaries of the site. To mitigate these risks, a safety buffer will be maintained between the project infrastructure and areas prone to flooding, as determined by the hydrology assessment. Furthermore, as part of ESAP#2, MSP, along EPC contractor and O&M team will develop a Stormwater Management Plan for both the construction and operational phases. The construction-phase plan will include the design of appropriate stormwater drainage systems tailored to the site's conditions.

PS4 – Community Health, Safety & Security
Community Exposure to Disease
The project is located in a sparely populated rural area, with the nearest residential area, located approximately 2.3km from the site. Although, the project intends to maximize recruitment from local communities to the extent possible, the large construction related workforce needs may lead to an influx of workers into the region. As stated earlier, no workers accommodation camp will be set up for the construction phase. Any accommodation of workers by the company or its contractors will need to meet the requirements of IFC/EBRD's guidance note Worker Accommodation: Process and Standards.
As per ESAP#7, the project will develop and implement a Community Health and Safety and Worker Influx Plan. The plan will include an assessment of worker influx at a cumulative level given other development projects within the area 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 ("CGM"); and (iv) provisions for periodical monitoring of social related effects of the influx of migrants. The implementation of this plan, together with the project Code of Conduct, measures to maximize local recruitment in the local procurement and employment procedure and plan, and the Worker Accommodation Plan (if needed, as per ESAP#2), will help manage the risks and impacts of population influx.

Road Safety & Traffic Management

During construction, the dominant vehicle movement patterns will be in relation to the transportation of construction material and equipment over the 18-months construction period. Increases in traffic related to the transportation of project components may represent a safety risk for the other road users and communities adjacent to the roads being used. The project ESIA has identified the road network and estimated road traffic; this information will be used by the project to develop a traffic management plan to bring in equipment and workers along with the associated impacts and mitigation.

As per ESAP 8, MSP shall undertake a Transportation Risk Assessment and guided by the findings, develop a Project Traffic and Transport Management Plan. The plan will define transport routes to be used for equipment deliveries based on the risk assessments undertaken to evaluate road traffic and conditions with the aim of minimizing impacts. It will also define a safety inspection program for the project (especially for local subcontractors) and implement ongoing monitoring of vehicles and proper use of safety measures.

The south part of the site is crossed by the existing commercial railway, which is used particularly for transport of phosphate. The new 200m OHTL will cross above the existing railway, and minimum legal height of 12m will be maintained. Access to the other side of the railway will be via existing designated crossing. In order to ensure workers' safety during construction and operation, the site will be fenced, and a minimum safety distance of 20m will be maintained between the site and railway. Furthermore, safety risk related to the railway will be covered under the OHS management plan (ESAP#2)

Security Personnel
A permanent fence will be erected around the perimeter of the site. Security and access control to the site will be provided on a 24-hour basis by a third-party security company retained by the EPC and O&M contractors during construction operations. Security guards will not be armed. Per ESAP#9, the project will develop a Security Risk Assessment and Security Management Plan for construction and operations phases based on HSES procedures, assessment findings, and PS4 requirements, including IFC's "Good Practice Handbook" and Voluntary Principles on Security and Human Rights. The plan will ensure security procedures are communicated to communities to foster understanding and minimize conflicts. During construction and operations. MSP will conduct regular audits of security provisions as part of monitoring and reporting under PS1 (per ESAP#1 and 4).

Community Safety of the existing OHTL
Key health and safety risks associated with high voltage power lines are: (i) electrical shock due to contact; (ii) overhead electric lines falling on the ground; and (iii) electromagnetic radiation from the power lines for which a safe distance must be kept. The RoW for the existing 145 km OHTL was established 40 years ago extending 14 meters on each side of the T-Line. For the planned upgrade works, MSP and its EPC contractor will request STEG to facilitate temporary access to the RoW. This access will be limited to a maximum duration of two months, with activities occurring no more than two days per week. STEG remains in control of the operation of the existing OHTL that MPS project and other entities are connected to. In alignment with ESAP#10, MSP, in collaboration with STEG, will undertake (i) conduct a comprehensive risk assessment on potential health and safety hazards for construction and operation of the transmission line due to its upgrade from 150kV to 225 KV voltage to meet the project capacity focusing on the areas of encroachment of the established RoW to repair, construct, or maintain transmission lines and towers, and (ii) communicate the outcomes of this assessment to STEG for appropriate follow-up actions, and provide best effort support on the implementation of necessary measures as required in accordance to IFC PSs.
Access to the transmission pylons is already established, as STEG performs bi-annual maintenance on the OHTL. The project will utilize these existing access routes, and therefore, no socio-economic or safety impacts whether temporary or permanent are anticipated during the upgrade works.

PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
The project site is in the "Saharan Halophytic Ecoregion" (WWF) and is characterized by a generally flat relief and an altitude between 95 and 111 meters. Hydrologically, the site is bordered to the east by the Wadi El Herriga and to the west by a tributary of the Wadi El Oussif. The landscape is characterized by sparse vegetation, composed of species adapted to conditions of water stress and sometimes high salinity. Other existing infrastructure in the vicinity includes a track from Route Nationale 15 (RN15), a railway line connecting Gabes to Gafsa, an existing 150 kV high-voltage overhead power line, and agricultural activities including olive trees.
The PV site is not located within an internationally recognized or Protected Area. The nearest Key Biodiversity Area is the Sebkhet Sidi Mansour (Ramsar site, KBA, IBA – 3km to the north). During rainy years, this site irregularly hosts large numbers of migratory waterbirds including threatened species such as Marbled Teal (Marmaronetta angustirostris, IUCN - NT), and White-headed Duck (Oxyura leucocephala, IUCN - EN).

The overhead grid connection and existing overhead lines do not pass through any internationally recognized or Protected Areas, but are within 5km of 3 such areas: (i) Chott el-Jerid (Ramsar, IBA, KBA, UNESCO proposed) is a large endorheic salt lake, however the area closest to the project is not typically the most inundated area (this is much further from the project, at-least ~20km); (ii) the second area is Sebkhet Sidi Mansour, described above; and (iii) the third is Chott Elguetar (Ramsar, KBA, IBA), a seasonal intermittent saline lake. When water is present in the site it is important for breeding and wintering water birds.
Tunisia has 42 Ramsar sites, many of which have dried out significantly in recent years as a result of climate change (the Mediterranean region has been designated a climate change hotspot), and do not typically perform the ecological function for which they were originally declared. No long-term data on the hydrology or avifauna of these sites exists. This is the case with the Ramsar sites close to this project. Local ornithological experts believe that these sites now hold water extremely seldom and they are no longer significant avifaunal receptors.
Flora surveys in May 2023 and March 2025, and satellite imagery identify the vegetation on site as typically steppe, with very sparse plant cover and an unremarkable floristic diversity. The site plants on

Stakeholder Engagement

To date, stakeholder engagement activities (informant interviews, focus group discussions including with youth groups and herders and other meetings) have been conducted as part of the ESIA process with the nearby communities. In addition, meetings were held on August 2025, with local government entities in the governorate of Gabes. Issues raised during these engagement activities relate to equitable access to employment and other economic opportunities and consideration of corporate social responsibility programs. The ESIA contains a framework Stakeholder Engagement Plan ("SEP"), which has identified stakeholders affected by the project, provided a summary of past stakeholder engagement activities, and presented a future stakeholder engagement strategy and plan. A full-time Community Liaison Officer will be retained to manage stakeholder relations between the project and the communities and to support the project's E&S manager.

MSP will also develop a Community Development Plan focusing on socio-economic development projects during the operation phase (ESAP#2).

Community Grievance Mechanism ("CGM"):
The SEP provides an outline of a CGM that allows for submission and management of grievances (including the lodging of anonymous grievances), reporting, and feedback loops. Per ESAP#13, the project will establish and maintain a project level CGM prior to the start of the construction phase and for the duration of the project in line with PS1 requirements. The CGM will be accessible for all types of complaints including those regarding GBVSH and gender-based discrimination, in a sensitive and confidential manner and allow for external redress using relevant independent parties where a resolution cannot be achieved internally. The Community Liaison Officer will also serve as a grievance officer and will act as the interface between EPC contractor and the local stakeholders on community matters including the recruitment of local workers and management of grievances as a result of the EPC actions and activities.

Broad Community Support

Not Applicable

BCS Comment :

Local Access of Project Documentation

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Environmental & Social Action Plan (ESAP)

Is there an ESAP to be disclosed for this project?
Yes

Mitigation Measures / Environmental & Social Action Plan (ESAP)

SNo	Description	Anticipated Completion Date
1	Voltalia will develop a Biodiversity Management Plan, including (i) no net loss strategy (ii) a 'snake and scorpion management protocol' in the BMP to ensure these animals are safely handled and relocated when encountered, without impact on staff or animal, (iii) a 'chance find procedure' for birds and other animal mortality at the PV facility and (iv) means for the effective and timeous implementation of all aspects of the BMP during both the construction and operations phases	12/31/2025
2	MSP will require the EPC and O&M contractors to develop a Construction Environmental and Social Management Plan ("CESMP") and Operation Environmental and Social Management Plan ("OESMP"). Sub-plan based on the risk related to the projects will be developed accordingly.	7/30/2027
3	The project will develop and implement a Community Health and Safety and Worker Influx Plan	1/30/2026
4	MSP will develop and implement (i) a Cultural Heritage Site Management Plan that will include avoidance protocols, in-situ preservation of known sites, monitoring procedures, contractor management measures; and (ii) a Chance Find Procedure, ensuring that contractors and employees are trained and sensitized to follow proper protocols in the event of discovering archaeological resources during land clearance or mechanical excavation.	1/30/2026
5	MSP will establish an EHS/OHS coordination procedure with STEG to ensure IFC PS compliance during OHTL construction and operations. The procedure will define engagement type and frequency and outline steps to ensure STEG and its EPC/subcontractors meet PS standards and WBG EHS guidelines. It will also address intervention plans for worker HSES during upgrade works.	1/30/2026
6	Voltalia/MSP will implement a project-level HSES management plan detailing construction processes and standards for E&S management, monitoring, and supervision.	1/30/2026
7	MSP will recruit an independent auditor to undertake labor and OHS audit during both construction and operations. The monitoring frequency will be quarterly throughout the construction phase and semi-annually in the first two years of operations.	1/30/2026
8	MSP will establish and maintain a project level Community Grievance Mechanism (CGM) prior to the start of the construction phase and for the duration of the project in line with PS1 requirements. The CGM will be accessible for all types of complaints including those regarding GBVSH and gender-based discrimination, in a sensitive and confidential manner and allow for external redress using relevant independent parties where a resolution cannot be achieved internally.	1/30/2026
9	Voltalia/MSP, in collaboration with STEG, will undertake (i) conduct a comprehensive risk assessment on potential health and safety hazards for construction and operation of the transmission line due to its upgrade from 150kV to 225 KV voltage to meet the project capacity focusing on the areas of encroachment of the established RoW to repair, construct, or maintain transmission lines and towers, and (ii) communicate the outcomes of this assessment to STEG for appropriate follow-up actions, and provide best effort support on the implementation of necessary measures as required in accordance to IFC PSs.	1/30/2026

10	The project will develop a Security Risk Assessment and Security Management Plan for construction and operations phases based on IMS procedures, assessment findings, and PS4 requirements, including IFC's "Good Practice Handbook" and Voluntary Principles on Security and Human Rights.	1/30/2026
11	Voltalia/MSP will require their EPC supplier/s to engage an independent, reputable and experienced third-party consultant, to conduct an audit of their respective supply chain. This audit will be undertaken to verify labor and working conditions' compliance with the local regulations and international best practices. The audit report and any suggested corrective actions will be made available to IFC.	2/28/2026
12	MSP along with the EPC shall undertake a Transportation Risk Assessment and guided by the findings develop a Project Traffic and Transport Management Plan	1/30/2026
13	MSP will prepare a project-specific Worker's Handbook for construction and operations phases aligned with IFC PS2 requirements. Policies and procedures will apply to all project workers, including contractors and subcontractors (e.g., security providers), translated into French and Arabic, easily accessible, and communicated during induction and training. MSP will ensure EPC and O&M contractors align with these policies and maintain adequate HR staffing.	1/30/2026

Activity Log/Comments

Workflow Initiated by Bibi Najiah Kaudeer (Draft Environmental and Social Review Summary) Nov 09, 2025 10:24 PM ET

Comments:

Cleared by Mariana Tschumi (ESRO Clear) Nov 11, 2025 08:48 AM ET

Comments:

CRU Member Approved and Appraisal Disclosure Initiated by Ejura Phoebe Audu Nov 17, 2025 03:40 PM ET

Comments:
Client clearance letter received on 11/7/2025.

Supporting Documents

S.No.	Document Details