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## Environmental and Social Data Sheet

### Overview

Project Name:	GAFSA-KHOBNA SOLAR
Project Number:	2025-0608
Country:	Tunisia
Project Description:	<i>The project consists of the construction and operation of two solar PV plants and their transmission infrastructure, located in Tunisia, with power purchase agreements awarded through government tenders. The Gafsa PV plant has a capacity of c. 120 MWp (100 MWac) and an overhead transmission line of c. 12 km in 150 kV, and is located in the Gafsa governorate. The Khobna PV plant has a capacity of c. 237 MWp (198 MWac) and an overhead transmission line of c. 45km in 225 kV, and is located in the Sidi Bouzid governorate.</i>
E&S Risk categorisation	<i>High as per paragraph 4.18 of E&amp;S Policy</i>
Project included in Carbon Footprint Exercise <sup>1</sup> :	yes
(Details for projects included are provided in section: "EIB Carbon Footprint Exercise".)	

### Environmental and Social Assessment

The project has been categorised as High risk according to the EIBG's Environment and Social Policy (2022). It was determined that an ESIA was needed for both PV plants and related infrastructure under the EIB E&S Standards. Therefore, the project is categorized as High Risk.

#### Environmental Assessment

The promoters of each project are special purpose vehicles incorporated in Tunisia for the sole purpose of owning and operating the project, ultimately owned by Qair, the sponsor of the project.

On the basis of national legislation on environmental impact assessment, the PV plants and the transmission lines do not require an environmental impact assessment under the national legislation. In line with EIB Standard 1, the promoter determined - further to the classification of the project under national legislation - that an ESIA was needed for each of the 2 projects, each ESIA covering the PV plant and the related interconnection infrastructure.

The ESIA reports assessed relevant baseline conditions (e.g., air quality, noise, traffic, biodiversity), made an analysis of alternatives, cumulative impacts, mitigation measures,

<sup>1</sup> Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO<sub>2</sub>e/year absolute (gross) or 20,000 tonnes CO<sub>2</sub>e/year relative (net) – both increases and savings.



expected residual impacts after mitigation, and outline the summary of the E&S management plans and monitoring requirements and mitigation measures that will be required for the construction and operation phases of the project. The ESIA reports also covered baseline conditions and impact assessment along the overhead transmission line (OHTL). The ESIA reports included biodiversity and avifauna surveys for the project sites and OHTL.

The project is expected to have overall limited environmental impacts. The ESIA reports indicate limited air emissions, minimal wastewater generation, and minor use of hazardous materials. Management plans will include dust control measures and waste handling procedures during construction. During operation, the main impacts are related to loss and fragmentation of modified habitats with no particular high biodiversity value, barrier effect, and birds' collision risk with the overhead transmission lines. While the cleaning of the modules will prioritize dry solutions, wet cleaning may be needed when dust adheres due to rain or humidity. The promoters will develop a water management plan for construction and operations, ensuring efficient use, proper storage and quality monitoring, and analyse among others the water use competition provide mitigation as necessary. In both cases, the water is expected to be sourced by water trucks from the nearest municipality, within a 5-10km radius from the sites.

### Gafsa

The 120 MWp (100 MWac) Gafsa project is located in the Gafsa governorate. The site spans about 224 hectares, 4 km from Gafsa city center and 5 km from Mdhila. The plant access is via an existing 12 km track along a railway on the northern boundary. The grid connection will be through a new 12 km OHTL to the existing Mdhila substation.

The project site is relatively flat, and the soil is unsuitable for cultivation, mainly due to salt accumulation. The landscape has sparse vegetation adapted to water stress and high salinity. Nearby infrastructure includes a railway and a phosphate mining and processing plants. A semi-permanent wadi lies south of the PV site and will be crossed by the OHTL.

The PV site is not within any protected areas, the nearest being Chott Elguetar (Ramsar, Important Birds Area) about 12km east from the PV site and OHTL. It is a seasonal saline lake important for breeding and wintering water birds when water is present. No IUCN threatened or protected plant species were recorded, and all other fauna recorded on site is Least Concern nationally and globally.

Avifaunal surveys conducted on site have recorded several bird species, mostly passerines such as wheatears and larks. No evidence of migration routes was identified from baseline data on site or literature sources. Mainly three species of conservation concern were observed, however, all observations consisted of isolated or transient individuals. The promoter will install bird flight diverters on the full length of the OHTL and will undertake a bird mortality monitoring programme.

### Khobna

The 237 MWp (198 MWac) Khobna project is located in the Sidi Bouzid governorate. The project site covers around 267 hectares and is about 3 km from Mezzouna. Connection to the grid will be through a new 45 km OHTL that will connect to the existing Meknassy substation. Other existing infrastructure in the vicinity includes an existing overhead transmission line, agricultural activities, and another PV plant nearing construction completion, immediately adjacent. The project will connect to the grid via a new 45 km long overhead 225kV powerline northwards. In its southern sections, the OHTL will run adjacent to an existing OHTL until the Bouhedma national park boundary where it will divert eastwards to avoid the park, remaining outside its buffer zone.

The PV site is not located within any protected areas but is close to two such areas. The Sebket Noual, a wetland of international importance (Ramsar, Important Bird Area) is located ~4 km north-east of the PV site and ~1 km east of the central section of the OHTL line. The Bouhedma National Park (Important Birds Area) lies ~14km north of the PV site and immediately west of the northern section of the OHTL; around 20m from the buffer zone and therefore outside the rights of way. This park is home to steppe habitats and associated protected species and qualified as an Important Birds Area as a result of 'bioregion restricted assemblages', although none of the qualifying bird species are threatened species. The ESIA



report concluded that the Khobna PV plant and its associated OHTL are not expected to generate a significant impact on the conservation objectives or qualifying features of those designated sites in view of the foreseen mitigation measures. An adaptive management strategy will also be put in place to identify and mitigate unexpected significant residual negative impacts.

The project site is characterized by species adapted to dry and sandy conditions. No IUCN threatened plant species were recorded. Two plant species classified as threatened by the Tunisian Red List are protected (IUCN Red List, Least Concern) and one species is included in the IUCN Red List as Vulnerable. An appropriate monitoring programme will be developed and inform the need for additional measures to ensure conservation objectives of these species in case those are impacted by the project.

Avifauna surveys have been conducted covering multiple seasons and including transects and vantage points on both the PV site and OHTL. Recorded bird species include several nationally Red Listed species and two IUCN listed: Pallid Harrier (*Circus macrourus*, IUCN - NT) and European Turtle Dove (*Streptopelia turtur*, IUCN - VU). No evidence of migration routes was identified from baseline data on site or literature sources. Critical Habitat is not triggered for any species, although several high value biodiversity features are identified for recorded and potentially present species. A standalone Biodiversity Management Plan (BMP) has been drafted as part of the ESIA report. The BMP includes the requirement for the installation of bird flight diverters on the full length of the OHTL, including nocturnal devices in the vicinity of the Ramsar site, as well birds mortality monitoring programme.

#### **Climate Assessment:**

The project substantially contributes to the climate change mitigation objective. Residual risks from physical climate hazards are deemed low. The project has been assessed for Paris alignment and is considered to be aligned both for low carbon and resilience goals against the policies set out in the Climate Bank Roadmap, the Bank's Energy Lending Policy and the Bank's Energy Sector Orientation.

#### **EIB Carbon Footprint Exercise**

The direct CO<sub>2</sub> equivalent emissions of this project are negligible. In accordance with the Bank's current Carbon Footprint methodology, it is calculated that, based on the avoidance of electricity generation from a combination of existing and new power plants in Tunisia (combined margin for intermittent electricity generation), the total relative effect of the project is a net reduction in CO<sub>2</sub> equivalent emissions by 311 kt CO<sub>2</sub>e/yr.

For the annual accounting purposes of the EIB Carbon Footprint, the project emissions will be prorated according to the EIB lending amount signed in that year, as a proportion of project cost.

#### **EIB Paris Alignment for Counterparties (PATH) Framework**

The counterparty Qair (Head of Group) is in scope and screened out of the PATH framework, because it is not considered high emitting nor high vulnerability.

#### **Social Assessment**

The promoter has developed project-specific Resettlement Policy Frameworks (RPFs) defining each projects' approach, principles and objectives towards economic displacement, including provisions for a grievance mechanism and vulnerable groups. Based on detailed socio-economic and inventory surveys, project-specific Livelihood Restoration Plans (LRPs) will then be developed and implemented in accordance with the requirements of the lenders to address economic displacement, following the principles set under the RPFs.

Project-specific E&S management plans will be developed, including Labour Management Plan and Community H&S Plans, with particular attention to worker accommodation, worker influx,



work in extreme heat conditions, workers grievance mechanism, gender-based violence and harassment risks to workforce and communities, including measures to mitigate potential influx of people and gender-based violence and harassment risks.

Public reports have raised concerns regarding the possibility of use of forced labour in the supply chain of solar PV panels. The sponsor assesses its suppliers through a structured process that begins during pre-qualification and tendering. Suppliers are screened for environmental and social risks, labour standards, and compliance with sponsor's Code of Conduct and Sustainability Requirements.

#### Gafsa

The project will not result in any physical displacement, and the route of the line and access road have been selected to minimise impact on land use. The PV plant is on privately owned land, which the promoter is leasing through a willing lessee/lessor arrangement. The plot is uninhabited and was previously used for large scale plantation, however, has been abandoned for the past four years, due to unavailability of fresh water. The plot is also used on seasonal basis by local herders (including the use of temporary shelters), who have confirmed their ability to find alternative land. The access track to the plant will be partly enlarged, while remaining within the existing railway authority domain, with no physical displacement expected. The OHTL will cross private, collective, and state-owned parcels, and could affect agricultural and grazing activities. However, no structures have been identified on the way and therefore physical displacement is not expected. The ESIA report indicates that only one privately owned plot of land used for agriculture would be directly affected by a pylon, while the rest of the route crosses pastureland or uncultivated land, with no dwellings.

Increased traffic may pose safety risks for other road users and nearby communities. The last section of the access road runs along an existing railway. A school is also located along the access route. The promoter will develop a Transport Management Plan to minimize impacts and manage the risks, by establishing a safety inspection program and by implementing monitoring.

#### Khobna

The PV plant plot of land is part of the private domain of the Tunisian state and has specifically been chosen for its flat, homogeneous terrain, which is ideal for solar infrastructure. The project will not result in any physical displacement, and the final route of the overhead transmission line and access road have been selected to minimise impact on land use.

The PV plant plot is uninhabited; however, a few structures found on the project land are used as temporary shelters by two herders from the nearby village. The project plot is also used for herding activities mainly by the two identified herders on a seasonal basis and loss of access to grazing areas within the plot is expected. The OHTL will traverse multiple privately titled parcels and state-owned parcels and is expected to affect agricultural (e.g. olive groves) and grazing activities. No structures have been identified along the OHTL; therefore, physical displacement is not expected. The restrictions of use related to the rights of way of the transmission line are not expected to lead to loss of livelihood, as the ESIA report did not identify any tall trees or vegetation that would require removal due to restriction of use. However, this shall be confirmed in the LRP. The national legislation provides a right of way for electricity lines, allowing power lines to cross land, including agricultural areas, without needing to buy the land or expropriate it. Regarding occupation of land for the transmission line (e.g. for the pylons), temporary occupation agreements will be concluded, and the promoter (through the national utility "Société Tunisienne de l'Electricité et du Gaz" that will ultimately own and operate the lines upon completion) can ultimately resort to legal proceedings that essentially forces a landowner to accept the occupation of their land.

An archaeological site was discovered on the initial route of the overhead transmission line, and appropriate diversion has been decided following consultation with the competent authority. A 1km buffer zone has been established, beyond national requirements, to ensure no interaction between the project and the site. A precautionary chance find procedure will be established to handle any accidental archaeological discoveries during the construction phase.



## Public Consultation and Stakeholder Engagement

Stakeholder engagement activities, including interviews, focus group discussions, and other meetings, have been conducted as part of the ESIA process with nearby communities. Meetings were also held with local government entities in the governorates of Gafsa and Sidi Bouzid (for Khobna). Issues raised include equitable access to jobs, economic opportunities, and consideration of corporate social responsibility programs.

Stakeholder Engagement Plans (SEPs) have been developed, identifying affected stakeholders, summarizing past engagement, and outlining a future strategy. The SEPs outline Community Grievance Mechanisms for submitting and managing grievances.

A full-time Community Liaison Officer will manage stakeholder relations and support the project's E&S manager. The Community Liaison Officer will also act as grievance officer and interface with local stakeholders on community matters, including local recruitment and grievances related to construction activities. The promoter will also develop Community Development Plans focusing on socio-economic projects during the operation phase.

## Other Environmental and Social Aspects

The sponsor has an Environmental and Health & Safety ("H&S") Management Systems, along with relevant policies at corporate level and standards procedures for project development and implementation. Comprehensive Health and Safety, Social and Environmental (HSSE) management systems will be developed for the project, including the development of specific management plans appropriately cascaded to sub-contractors.

The ESIA reports include the summary of the E&S management plans, monitoring requirements, and mitigation measures that will be required for construction and operation phases. The Environmental and Social Management Plans (ESMPs) will be further developed and implemented for the construction and operational phases. The ESMPs will outline the set of management processes and procedures at project level, including the roles and responsibilities and measures to be developed/taken by the various actors for duly addressing any project-related environmental and social risks and impacts, in line with the requirements of the ESIA reports.

In addition, the project will include subsequent measures and actions aligned with the Bank's Environmental and Social Standards in the form of Environmental and Social Action Plans (ESAPs), following the co-lenders procedures.

## Conclusions and Recommendations

This operation is acceptable to the Bank from an environmental and social point of view under the following conditions:

- Finalization of the ESAPs prior to financing.
- The promoter will undertake to ensure that the land acquisition required for the project is carried out in accordance with the requirements of the EIB E&S Standards, and document and report on the land acquisition process accordingly to the Bank, including by preparing LRPs to the satisfaction of the Bank prior to construction of the relevant components.
- The promoter will develop and implement project-specific Environmental and Social Management Plans prior to the start of construction (including traffic management plan, waste management plan, biodiversity management plan, labour management plan, etc).
- The project shall comply with the EIB Environmental and Social Standards, which foresee a zero tolerance of forced labour. The promoter undertakes to make reasonable efforts to assess and address the labour risks associated with the solar PV panels used in the project, including by using reasonable efforts to carry out appropriate due diligence throughout its supply chains, with the aim of avoiding the use of forced labour in the supply chains of the solar panels that will be used for this project. The outcome will be reported to and reviewed by the Bank.