

Gap Analysis & Disclosure Pack for Category A Project: Project El-Med - Tunisia

13 August 2023

Environmental and Social Action Plan



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Services Limited (ESAS)

Prepared for:

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		Signatures			
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1. Introduction

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing finance through a loan to *Société Tunisienne de l’Électricité et du Gaz* (“STEG”). STEG is Tunisia’s 100% state-owned vertically integrated national electricity and gas utility company and is administered by the Ministry of Industry, Mines and Energy. STEG has the monopoly on the distribution and transmission of electricity and gas and acts as the single buyer for all electricity generated. STEG controls electricity generation through its monopoly position as the sole owner of the 5,944 MW domestic installed capacity, which is provided through 25 power plants.

The proceeds of the loan will be used to finance a 600 MW interconnection between Tunisia and Italy: a 200 km 600 MW High-voltage-Direct Current (“HVDC”) marine cable interconnection between two landing points in Cap Bon Tunisia and a single landfall site in Sicily, Italy.

The project is co-financed by the World Bank (WB), European Investment Bank (EIB), and KfW Development Bank (the Lenders).

The Italian and Tunisian governments signed a joint declaration in 2007 instructing both transmission system operators TERNAspa. and STEG, to develop an electrical network interconnecting project targeting markets in Africa and Europe to develop renewable energy on the African continent, increase Tunisian energy security, and foster integration of European and African energy markets. Since then, the Project has been the subject of several studies that have informed the design of the Project. These studies have been managed by a special purpose company (ELMED Etudes Sarl), a joint venture company between TERNAspa and STEG.

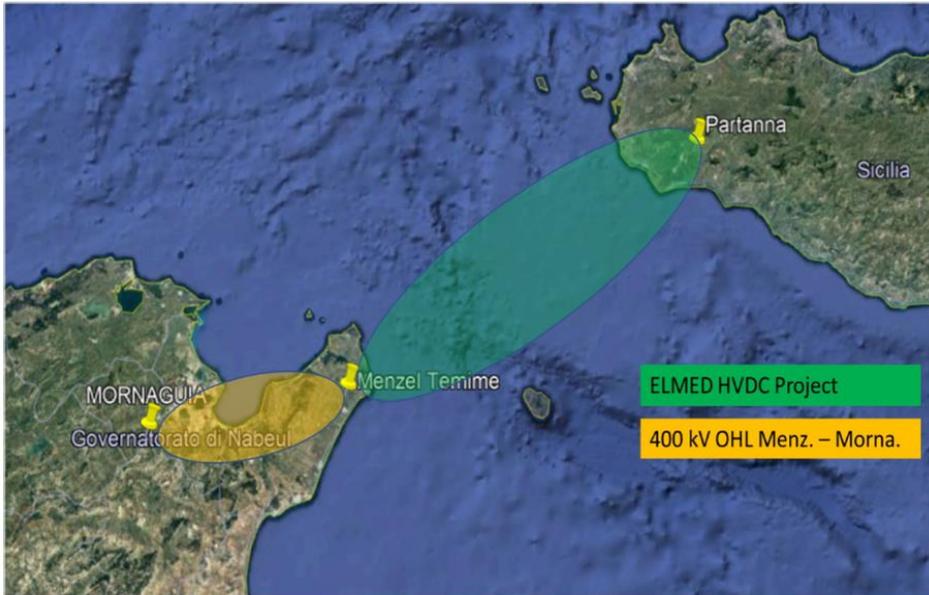
As the Project involves the development of a greenfield facility, the EBRD (and WB) have assigned it a Category A, requiring a comprehensive Environmental and Social Impact Assessment (ESIA) and review of associated documents, followed by their public disclosure for a minimum of 120 days.

The Bank has engaged Environmental and Social Advisory Services Limited (ESAS), an Independent Consultant to undertake an “Assignment” to carry out a gap analysis of the existing ESIA disclosure package against the EBRD requirements for ESIA.

2. Project summary

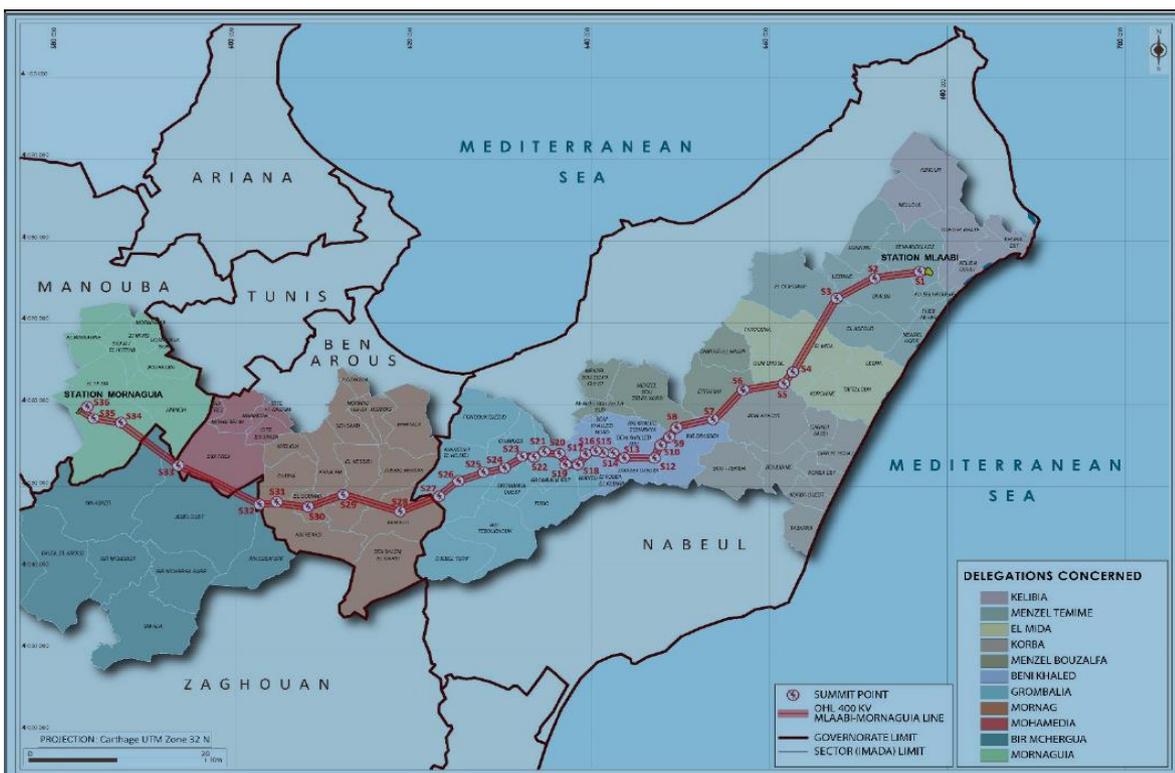
The Project involves the installation of a new sub-marine high-voltage DC cable interconnection between Sicily on the Italian side and the Cap Bon peninsula in Tunisia (see Figure 2.1). On the Tunisian side, the project consists of a) a 10km underground cable from the marine cable landfall area at Poste Mlaabi at Cap Bon to an Alternating/Direct Current (AC/DC) converter station in Mlaaba municipality, in the Cap Bon area (funded by EBRD); b) the HVDC converter station in Mlaaba (funded by the World Bank); c) a new 400/225 kV substation in Grombalia (funded by the World Bank); d) a new 400 kV double-circuit OHTL of 65 km length from the new HVDC converter station to the 400 kV Grombalia 2 substation (funded by The World Bank); and e) a new 400kV single-circuit OHTL of 51 km from Grombalia 2 substation to the existing Mornaguia substation in the greater Tunis area (funded by the World Bank).

Figure 2.1. Map of the new interconnector cable between Tunisia and Italy



The OHTL crosses several delegation administration units in the Nabeul governorate: Menzel Temime (this is the location of the Tunisian-side landfall station), El Mida, Korba, Menzel Bouzalfa, Beni Khaled and Grombalia; two delegations in the governorate of Ben Arous: Mornag and Mhamedia; one delegation in the governorate of Zaghouan: Bir Mchergua; and one delegation in the governorate of Manouba: Mornaguia.

Figure 2.2. Map of the OHTL and intersection with delegation administrative units



The following associated facilities¹ have been identified for the Project:

- Tunisia: new electrical substation to be located in Grombalia, connecting the OHTL to the existing electrical grid; and
- Italy: all project components on the Italian side, both terrestrial and marine.

3. Preliminary ESAP

This ESAP has been developed for the Project based on the outcomes of the environmental and social assessment. The ESAP contains mitigation and performance improvement measures and actions that address the identified social and environmental gaps. The mitigation measures are actions designed to ensure that the Project will operate in compliance with national legislation as well as EBRD's ESP in all relevant stages of the Project. The ESAP focuses on the avoidance of identified environmental and social impacts where possible, or on the mitigation measures to minimize or reduce possible impact to acceptable levels.

The responsibility for the Tunisia ESAP implementation, in accordance with the proposed measures and defined time schedule, lies with STEG. Specific personnel, including a person responsible for Environmental, Social, Health & Safety (ESHS) management and, implementation of the ESAP should be designated within STEG.

STEG will have also to ensure that employees with direct responsibility for activities relevant to the Project E&S performance are adequately qualified and trained so they have the necessary knowledge and skills to perform their work. STEG must establish procedures to monitor and measure the progress in ESAP implementation.

Regular (monthly) progress reports on ESAP implementation should be prepared by STEG and approved by the person responsible for ESHS management. As part of their regular reporting to EBRD, STEG will provide updates on their progress in implementing the ESAP.

The ESAP is presented in the form of a table containing a number of fields as follows:

- ESAP Item 'No.' contains a unique number for each action of the ESAP;
- 'Action' summarises the action STEG is required to undertake. The action tables within the ESDD provide more specific details on the gap to be addressed, to enable the Project to be in compliance with Lender requirements;
- 'E&S Risks' summarises the ESHS issue identified during the ESDD phase that needs to be addressed by the Project;
- 'Requirement' details the legislative, Lender or Good Practice requirement the Project is expected to meet;
- 'Timeframe' provides indications of when the action should be completed. The timeframe for ESAP implementation is to be agreed between the Project and the Lenders; and

¹ Defined in ESP 2019 as facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.

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- 'Target and Evaluation Criteria' outlines the required deliverable against which the ESAP item will be tracked and evaluated against to close out the item.

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
PR1	Assessment and Management of Environmental and Social Impacts and Issues					
1.1	<p>STEG to undertake a navigational risk assessment reflecting the physical presence of the cable laying vessel and supporting vessels.</p> <p>STEG to include the findings of the assessment in the tender documentation so that the construction contractor is required to prepare a Navigational Risk Management Plan.</p> <p>STEG to ensure that the Construction Contractor discloses the Navigational Risk Assessment to the relevant authorities in Tunisia and Italy and organises a meeting to discuss the content of the plan.</p>	The management of E&S risks and impacts arising from the Project.	EBRD PR1	STEG	<p>Navigation Risk Assessment is prepared by 30 September 2023 and included in tender documentation</p> <p>Contractors to submit the Navigational Risk Management Plan to STEG for approval at least 3 month prior to the commencement of construction</p>	<p>EBRD approved Navigational Risk Management Plan.</p> <p>Stakeholder engagement records/minutes of meeting.</p>
1.2	<p>STEG to prepare a Construction Contractor Management Plan that describes how the actions of the contractor will be monitored during the construction stage of the Project. The scope of the CMP should include the following topics as a minimum:</p> <ul style="list-style-type: none"> • Human resources management • Occupational health and safety • Community health and safety 	Risk of poor environmental and social performance by the construction contractor.	EBRD PR1	STEG	By 30 September 2023 and in any case as part of tender documentation and no later than 3 months prior to the start of construction.	EBRD approved Construction Contractor Management Plan.

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
	<ul style="list-style-type: none"> Onshore traffic and transport management Security management Emergency preparedness and response Terrestrial noise and vibration Waste management Hazardous materials management Marine sediment and turbidity control Pollution prevention (including suspended solids) and MARPOL requirements for marine vessels 					
1.3	STEG to enhance their internal organisational capacity to ensure that they will be able to monitor environmental and social risks and impacts during the construction stage, and during operations.	Risk of inadequate internal organisational capacity to manage significant E&S risks generated by the Project.	EBRD PR1	STEG	Initial training to be completed 6 months after the signing of the loan agreement and no later than 6 months prior to the start of construction	EBRD approved Training Plan. Training Evaluation Report.
1.4	STEG to ensure that their legal department tasked with overseeing implementation of the Livelihood Restoration Plan are suitably trained in the key differences between national legislation and EBRD's ESP and accompanying PR1, PR5 and PR10.	Risk of a lack of understanding in relation to the requirements of PR1, PR5 and PR10 and how they should be applied to the Project.	EBRD PR1 / PR5	STEG	6 months after the signing of the loan agreement and in any case no later than 3 months before the commencing of the land acquisition	EBRD approved Training Plan. Training Evaluation Report.

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
1.5	STEG to prepare and implement an ESMP Monitoring and Evaluation Procedure that initially focuses on the construction stage and will later be updated prior to the operations stage.	Risk of inadequate monitoring to demonstrate non-compliances with the ESMP.	EBRD PR1	STEG	12 months after the signing of the loan agreement and in case no later than 3 months prior to the commencement of the ground clearance	EBRD approved ESMP Monitoring and Evaluation Procedure. Monitoring Records.
1.6	STEG to prepare and implement an Environmental and Social Management System covering the construction stage and update the ESMS prior to the start of the operational stage.	Risk of poor E&S management	EBRD PR1	STEG	12 months after the signing of the loan agreement and in any case no later than 3 months prior to the start of construction	EBRD approved ESMS covering the activities to be undertaken during the construction stage.
PR2	Labour and Working Conditions					
2.1	STEG to undertake a site-specific assessment to identify the optimum location of the worker accommodation (if required), taking into consideration the presence of nearby E&S receptors, the risk of spreading COVID-19, and other risk factors. STEG to use the results to prepare a Workforce Accommodation Plan.	Existing EIA Study does not adequately assess risks associated with the incoming workforce and worker accommodation.	EBRD PR2	STEG	3 months prior to the start of construction	EBRD approved Site Selection Report for worker accommodation. EBRD approved Workforce Accommodation Plan.
2.2	STEG to update the existing Labour Management Procedure to reflect the comments included in the ESAS Gap Analysis Report.	Risk of poor working conditions amongst the contracted workforces.	EBRD PR2	STEG	3 months after the signing of the loan agreement	EBRD approved Labour Management Procedure.

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
2.3	STEG to develop a Supply Chain Audit Protocol associated with the risk of human right (including labour) violations within the Construction Contractor, and also within supply chain companies used by the Construction Contractor.	There is a risk that foreign-based companies who are 'primary suppliers' to the Project (these are companies who directly provide goods or materials essential for the core operational functions of the Project have workplaces where labour violations occur.	EBRD PR2	STEG / Construction Contractor	6 months after the signing of the loan agreement	EBRD approved Supply Chain Audit Protocol.
PR3	Resource Efficiency and Pollution Prevention and Control					
3.1	STEG To develop within the ESMS (Item 1.16) comprehensive requirements for preventing pollution (to air, water and land) both in terms of construction and operation of terrestrial elements (landfill facilities, substation and OHTL) as well as marine aspects (including turbidity/ pollution risks during installation as well as MARPOL aspects) and include these into the tender documentation for construction contractors.	Risk of pollution and damage to the environment	EBRD PR3	STEG	6 months after the signing of the loan agreement	Comprehensive pollution control measures within the ESMS, construction and operation and maintenance plans
3.2	Construction Contractor to develop and implement a comprehensive Pollution Prevention Plan (covering air, water, and land pollution as well as waste management), as part of the construction ESMS, with clear processes and Methods Statement for	Risk of environmental pollution from the inappropriate management during	EBRD PR3	STEG / Construction Contractor	An outline of the Pollution Prevention Plan to be included in contractor bidding documents.	Pollution Prevention Plan outline to be included in the bidding documents.

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
	<p>preventing pollution associated with all terrestrial and marine aspects.</p> <p>The Pollution Prevention Plan shall define how emissions will be monitored and controlled and include and 'Adaptive Management' process (and trigger action levels where appropriate) to reduce emissions where levels are deemed excessive.</p>	<p>construction/ installation.</p>			<p>Approved Pollution Prevention Plan 3 months prior to the start of construction.</p>	<p>EBRD approved Pollution Prevention Plan.</p>
PR4	Health, Safety and Security					
4.1	<p>STEG to develop within the ESMS (Item 1.16) comprehensive requirements for:</p> <ul style="list-style-type: none"> a. Occupational Health & Safety Plan b. Community Health and Safety Plan <p>The ESMS must define the required approach hazard identification, risk assessment and control.</p> <p>The requirements should include both construction and operation phases for both terrestrial and marine aspects and reflect EBRD PR4, National and EU requirements as well as applicable Good International Practice standards.</p>	<p>Risk of accident/ injury</p>	<p>EBRD PR4</p>	<p>STEG</p>	<p>Draft Plans to be submitted to EBRD 6 months after the signing of the loan agreement.</p> <p>Approved Occupational Health & Safety Plan and Community Health and Safety and Security Plan prepared 3 months prior to the start of construction.</p> <p>An outline of the Construction Contractor Health & Safety Plan and Community Health and Safety and Security Plan to be</p>	<p>EBRD approved Occupational Health & Safety Plan (STEG)</p> <p>EBRD approved Community Health and Safety and Security Plan (STEG)</p>

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
					included in contractor bidding documents.	
4.2	<p>Construction Contractor to develop and implement a comprehensive</p> <p>a. Occupational Health & Safety plan</p> <p>b. Community Health, Safety & Security Plan,</p> <p>As part of the construction ESMS (for both terrestrial and marine aspects), which includes a comprehensive Risk Register and associated risk controls informed by application of the Hierarchy of Hazard Control.</p> <p>The Plan shall define detailed procedures and processes to control risk</p> <p>The draft plan(s) shall be subject to approval by STEG as well as Lenders</p>	Risk of accident/injury	EBRD PR4	STEG / Construction Contractor	Approved Health & Safety Plan and Community Health and Safety and Security Plan prepared 3 months prior to the start of construction.	<p>EBRD approved Occupational Health & Safety Plan (Construction Contractor)</p> <p>EBRD approved Community Health and Safety and Security Plan (Construction Contractor)</p>
PR5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
5.1	STEG to update the existing Resettlement Framework based upon the comments made in the ESAS Gap Analysis Report and ensure that this is compliant with relevant PR5 requirements. Disclose updated Resettlement Framework at Project locations and STEG website	The Resettlement Framework is incomplete.	EBRD PR5	STEG using support from an external consultant	By 15 November 2023	EBRD approved Resettlement Framework
5.2	STEG to prepare a Livelihood Restoration Plan in accordance with PR5. The LRP to contain a detailed analysis of land-related impacts, as this information is not provided in the ESIA to the required level of detail.	Land-related risks and impacts have not yet been adequately assessed.	EBRD PR5	STEG using support from an external consultant	3 months prior to the signing of the Loan agreement	EBRD approved Livelihood Restoration Plan

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PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	<p>STEG to conduct a Critical Habitat Assessment (CHA) for the coastal and marine area of the Project. The CHA will be a desktop study based on existing project baseline information, complemented by resources available on the internet (e.g., IBAT, UN/CBD Ecologically or Biologically Sensitive Area description of Sicilian Channel). The assessment should use the criteria and thresholds in EBRD's Guidance Note 6 (2020). The precautionary principle should be applied where information is insufficient to make a definitive assessment, such as deep water corals, or the occurrence of species not confirmed in the baseline but where other sources indicate its potential regular occurrence in the area of influence.</p> <p>The CHA shall at least cover the following species:</p> <p>Marine turtles: species present in to be defined Aol (to include feeding, nesting patterns and especially seasonality).</p> <p>Marine mammals: species list, population status including seasonal presence in the K-IMMA (Tunisia) and EBSA (Sicilian Channel covering both Tunisia and Sicily).</p> <p>IUCN marine species: to cover specifically species such as Maltese skate (Critically endangered) and</p>	Risk of impacts to critical habitats and species, including critically endangered and/or formally protected).	EBRD PR6	STEG	<p>Critical Habitats Assessment shall be completed and report provided to EBRD for review and comments by 30th September 2023.</p> <p>Final CHA, incorporating EBRD comments, shall be feed into the updated Biodiversity Impact Assessment of the ESIA. A Biodiversity Impact Assessment addendum to the ESIA shall be disclosed no later than 30 October 2023</p> <p>Revised Biodiversity Management Plan to be submitted to EBRD for review and comments no</p>	<p>EBRD approved Marine Survey and Assessment Report (the (ESIA for Tunisia and VINCA for Italy).</p> <p>EBRD approved Biodiversity Action Plan and Management Plans.</p>

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
	<p>great white shark (where the Strait of Sicily appears a key area for their reproduction at Mediterranean level) Fish: (e.g. bluefin tuna, swordfish, anchovy).</p> <p>Birds: to cover resident, migratory species especially given the transboundary nature of the project. The data is limited for both Tunisia and Italy. A number of species could be affected synergistically (collisions, bird mortality,) given the adjacent associated facilities and the transboundary nature of the project. focusing on bird collisions and mortality.</p> <p>The findings of the Critical Habitats Assessment shall inform further assessment of biodiversity impacts (such as, for example, underwater noise, increased turbidity and sedimentation; accidental release of drilling fluid, introduction of invasive alien species, etc, etc.) and relevant mitigation and monitoring measures and augment the existing ESIA with Biodiversity Impact Assessment and Mitigation Plan based on the findings of the CHA, as needed. Impacts to any receptors that trigger the categorization of Critical Habitat or Priority Biodiversity Feature (per ESAP #6.1 above) must be analysed in the revised Biodiversity Impact Assessment Section/Addendum of the ESIA. The updated mitigation plan must follow the Mitigation Hierarchy and achieve No Net Loss for Priority Biodiversity Features and the habitat that</p>				<p>later than 30 October 2023 and final Biodiversity Impact Assessment disclosed no later than 30 November 2023.</p>	

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
	<p>supports them, and a Net Gain for Critical Habitat features and the habitat that supports them. This may require avoidance of deepwater corals, if present in the AOI. The Mitigation Plan must also include specific monitoring requirements to ensure that Net Gain and No Net Loss targets are achieved.</p> <p>Update the Biodiversity Management Plan. The revised Biodiversity Management Plan shall take into account the Associated Facilities and other ongoing and planned development activities in the area and include adaptive management provisions to allow for the future assessment and mitigation of unforeseen impacts. The adaptive management component should include quantitative mortality thresholds that trigger additional mitigation necessary to achieve No Net Loss for birds that are Priority Biodiversity Features.</p>					
6.2	<p>STEG to commission a suite of rapid field pre-construction surveys to rule out presence of critical habitat species that might be adversely affected by the construction activities. Pre-construction surveys shall cover the following:</p> <p>Nearshore habitats at Tunisia landfall site: to provide a quantitative assessment of key habitats with a specific focus on <i>Posidonia oceanica</i> seagrass meadows.</p>	<p>Risks to specific habitats and species which have not been adequately assessed in the ESIA (Tunisia) and VINCA (Italy).</p>	EBRD PR6	STEG	3 months before start of any construction.	<p>EBRD approved Marine Survey and Assessment Report (the ESIA for Tunisia and VINCA for Italy).</p> <p>EBRD approved Biodiversity Action Plan and</p>

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
	<p>Nearshore habitats at Italy landfall site: to provide additional and more specific assessment on habitats and species in the context of the Natura 2000 site given its immediate proximity to the proposed landfall site.</p> <p>Focus should ultimately be on the fact that the Strait of Sicily and this part of the Mediterranean more generally is considered a biodiversity hotspot and must be seen holistically rather than sector by sector and/or nationally.</p>					Management Plans.
6.3	STEG to formally approve Management Plans, Biodiversity Action Plan and other relevant documentation and include them into the tender documentation.	Risk of impacts to critical habitats and species, including critically endangered and/or formally protected).	EBRD PR6	STEG	30 November 2023	Letter of approval of the Management Plans, Biodiversity Action Plan and other relevant documentation.
PR8	Cultural Heritage					
8.1	STEG to prepare a cultural heritage risk assessment associated with the potential presence of underwater archaeological receptors in Tunisia and use the results to prepare a Cultural Heritage Management Plan that manages potential risks to both terrestrial and marine cultural heritage receptors. Engagement with the relevant government regulators will be required during completion of the above.	Risk of damage to terrestrial and marine cultural heritage receptors. Risk of regulatory enforcement action.	EBRD PR8	STEG	30 November 2023	EBRD approved Cultural Heritage Management Plan

No.	Action	Environmental & Social Risks	Requirement (Legislative, EBRD PR, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria
PR10	Information Disclosure and Stakeholder Engagement					
10.1	STEG to undertake additional public consultation with specific stakeholder groups, including farmers, artisanal fishermen, residents of affected communities (where not included in the above), local women, and young people, to provide them with accurate information about the Project, potential risks and impacts during construction and operation, and raise awareness of the grievance mechanism. Additional efforts must be undertaken to engage in a culturally appropriate manner with vulnerable people who may be directly impacted by the Project, such as those within impacted farmer or fishermen households. stakeholder feedback obtained	There is a risk of in accurate perceptions about the Project developing due to a lack of information.	EBRD PR10	STEG	Commence additional stakeholder consultations in October 2023 and conduct on the ongoing basis to provide an update on the ongoing project activities, impacts assessment and mitigation measures.	Stakeholder engagement summary and a description of how the outcome of engagements have been used to inform the management of E&S aspects in the ESMS.
10.2	STEG to develop a range of project information tools that can be used to disclose accurate information to stakeholders, prior to the start of construction, and disclose this information in accordance with the SEP.	There is a risk of in accurate perceptions about the Project developing due to a lack of information.	EBRD PR10	STEG	30 November 2023 and review and update on regular basis	Project information tools and stakeholder engagement records reflecting their disclosure.
10.3	STEG to implement the updated SEP, review its content on an annual basis, and update the document so that it reflects the relevant stage of the Project.	There is a risk of in accurate perceptions about the Project developing due to a lack of information.	EBRD PR10	STEG	Immediately and for life of the Project	Records demonstrating implementation of the SEP.
10.4	STEG to implement the Grievance Mechanism included in the SEP which must be able to receive anonymous grievances. Awareness of the grievance	There is a need to manage negative perceptions towards the Project	EBRD PR10	STEG	Prior to disclosure and disclosed for a period of 120 days	Updated Grievance Register, and evidence of how

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	mechanism must be raised so that it is accessible to stakeholders.	prior to the start of construction, and during construction and operation.			as outlined in the SEP	awareness of the mechanism has been raised amongst stakeholders.