


NON-TECHNICAL SUMMARY OF THE ENVIRONMENTAL & SOCIAL ASSESSMENT REPORT

**50 MW SOLAR AND 10 MW/20MWH BATTERY ENERGY STORAGE
SOLUTION (BESS) WITH ASSOCIATED TRANSMISSION LINE PROJECT
IN BENI MHIRA, GOVERNORATE OF TATAOUINE – TUNISIA**

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REPORT: **NON-TECHNICAL SUMMARY (NTS) OF ENVIRONMENTAL AND SOCIAL ASSESSMENT REPORT (ESAR) 50 MW SOLAR AND 10 MW/20MWH BATTERY ENERGY STORAGE SOLUTION (BESS) WITH ASSOCIATED TRANSMISSION LINE PROJECT IN BENI MHIRA, GOVERNORATE OF TATAOUINE – TUNISIA**

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REPORT REVIEW		
DATE	VERSION	REFERENCE
06 February 2026	00	Draft Version
01 March 2026	01	Final Version

This report has been prepared by Environmental Assessment and Management (EAM) with all reasonable care and diligence in accordance with the terms of our contract with the client, including our General Terms and Conditions of Business, and taking into account the resources allocated in agreement with the client.

We accept no liability to the client or any other party in respect of any matter outside the scope described above.

This report is confidential to the client and we accept no liability of any kind to third parties who may become aware of this report, in whole or in part.

This report has been prepared in accordance with EAM's Integrated Management System.






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ABREVIATIONS & ACROMYNES

AC	Alternating Current
BESS	Battery Energy Storage Solution
DC	Direct Current
DGRE	Directorate-General for Water Resources
E&S	Environmental & Social
EAM	Environmental Assessment & Management
EBRD	European Bank for Reconstruction
EPC	Engineering, Procurement, and Construction
ESAP	Environmental and Social Action Plan
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
GHI	Global Solar Irradiance
HV	High Voltage
IBA	Important Bird Area
IUCN	International Union for Conservation of Nature
kV	Kilovolt
KWh	kilowatt-hour
LC	Least Concern
MV	Medium Voltage
MW	Megawatt
OHTL	Overhead Transmission Line
PBFs	Priority Biodiversity Features
PV	Photovoltaic
RL	Local Route
RoW	Right of Way
STEG	Tunisian Electricity and Gas Company

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1 INTRODUCTION

As part of its energy transition strategy, Tunisia has set itself the target of achieving a share of renewable energies in the electricity mix of 35% by 2030 and 50% by 2035. This will result in the installation of a total functional renewable capacity of 4,850 MW by 2030 and 8,350 MW by 2035 using photovoltaic and wind.

The Tunisian Electricity and Gas Company (STEG), hereafter referred to as “the Developer” plans to build a 50 Mega Watt (MW) Photo Voltaic (PV) solar power plant and 10MW/20MW Battery Energy Storage Solution (BESS) in Beni Mhira within the governorate of Tataouine with associated high-voltage 1.2 km grid infrastructure hereafter referred to as “the Project”. The Tunisian Electricity and Gas Company (STEG) is a state-owned organization whose main missions are:

- Electrification of the country;
- Development and implementation of the natural gas transport and distribution network;
- Implementation of electrical infrastructure: production, transport, and distribution.

This document is the Non-Technical Summary (NTS) of the Environmental and Social Assessment Report (ESAR) for the 50 PV plant and 10 MW/20MWh BESS with associated TL project in Beni Mhira, governorate of Tataouine. It has been prepared in accordance with the Environmental and Social Policy (ESP - 2024) of the European Bank for Reconstruction and Development (EBRD).


1.1 PROJECT CATEGORISATION

The Project is classified as **Category B** considering EBRD’s Environmental and Social Policy (ESP, 2024) considering that the preparation of an ESIA report is not required.

1.2 AIM OF THE E&S ASSESSMENT REPORT (ESAR)

An Environmental and Social Assessment Report (ESAR) has been prepared in accordance with the Environmental and Social Policy (ESP - 2024) of the European Bank for Reconstruction and Development (EBRD). For this purpose, Environmental Assessment and Management (EAM) has been contracted by EBRD as an Environmental and Social (E&S) Advisor, to support the preparation of the ESAR. This assignment was carried out through a review of project documentation, remote meetings, one site visit for the environmental and social assessment (biodiversity, archaeology, landscape and environment) and stakeholder engagement conducted in January 2026.

The objective of the E&S Assessment Report (ESAR) is to identify and assess the potentially significant existing and future adverse environmental and social impacts associated with the STEG’s proposed Project, assess compliance with applicable laws in Tunisia, the EBRD Environmental and Social Policy (2024) and Environmental and Social Requirements (ESRs),

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determine the measures needed to prevent or minimise and mitigate the adverse impacts, and identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and/or the associated current operations. The assessment process has been designed to ensure that it is commensurate with, and proportional to, the potential impacts and issues of the Project.

2 DESCRIPTION OF THE PROJECT

2.1 PROJECT LOCATION

The Project is located in the Ksar Mehira sector of the Beni Mhira delegation, which is part of the Tataouine governorate. The nearest community to the Project site is Beni Mhira 15 km located to the northwest which has a population of approximately 8,190 divided into 2,134 dwellings (RGPH,2024).

The PV site is located in a rural area around 1 km from the local road RL1011 on the southwest and around 3 km from unclassified road on the northeast.

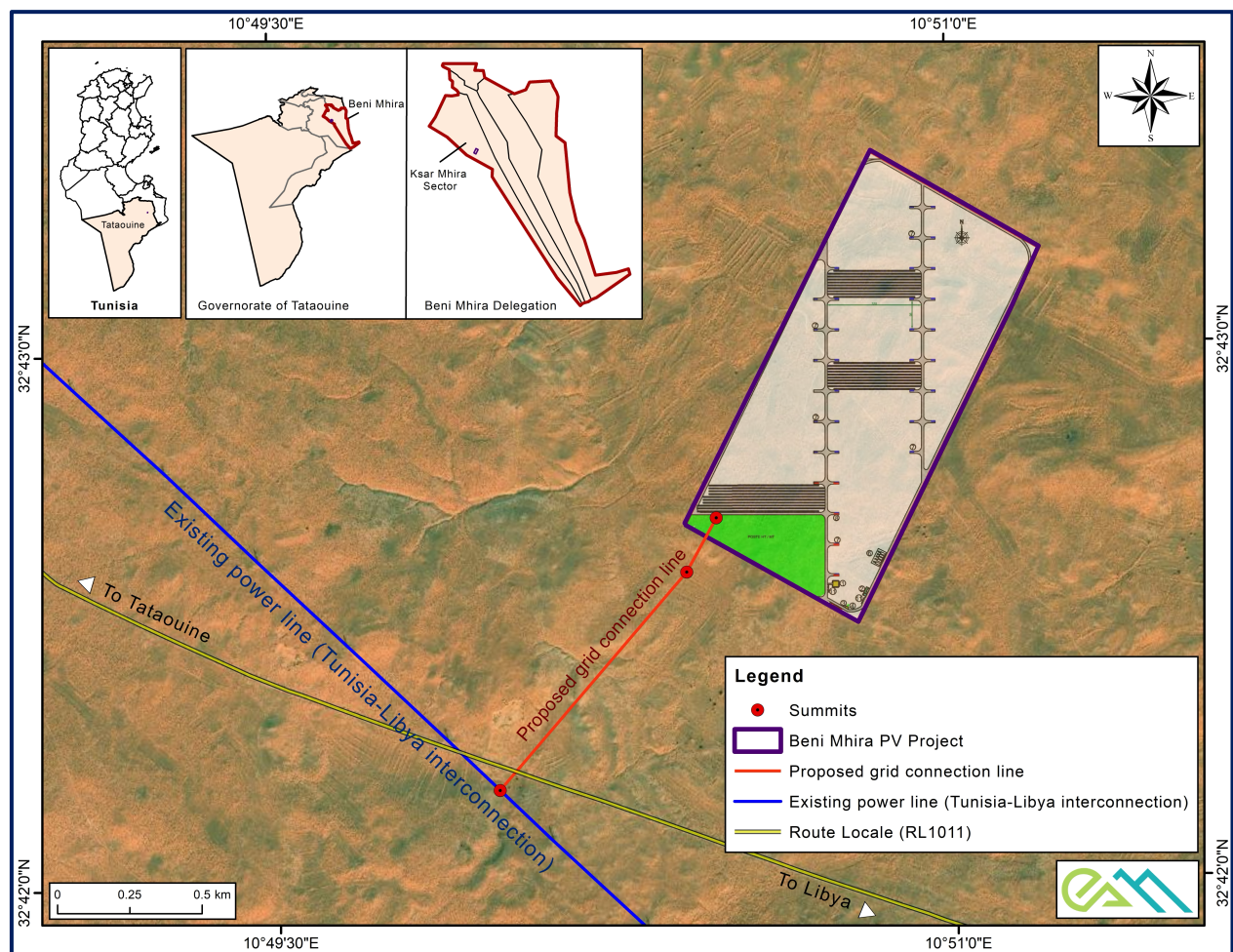


Figure 2-1 : Project location map

The Developer (STEG) will construct the solar arrays, the BESS and the HV/MV station on land ceded by the community land management of Zorgane «مجلس تصرف الزرقان», the landowner, to STEG, covering an area of **100 ha**. A purchase agreement was signed between the community land management of Zorgane and STEG and registered on December 19, 2017.

The geomorphology at the PV plant site is predominantly flat, with only minor topographic

variations. The land is used predominantly for grazing activities, with livestock movement occurring in scattered herds carried out by four (04) herders from the local community of Beni Mhira, managing approximately 210 camels.

The OHTL will have 3 summits (these designate a change in the direction of the OHTL) and mainly crosses land belonging to the community land management of Zorgane (1.1 km – 91%), the remainder crosses lands belonging to the community land management of Mhamedia “محمدية”.

The site is in a rural area, and the nearest infrastructure consists of an existing 225 kV OHTL connecting Tataouine to Rouis (Libya) located approximately 1.2 km from the PV site. The site is accessible via the local road RL1011.

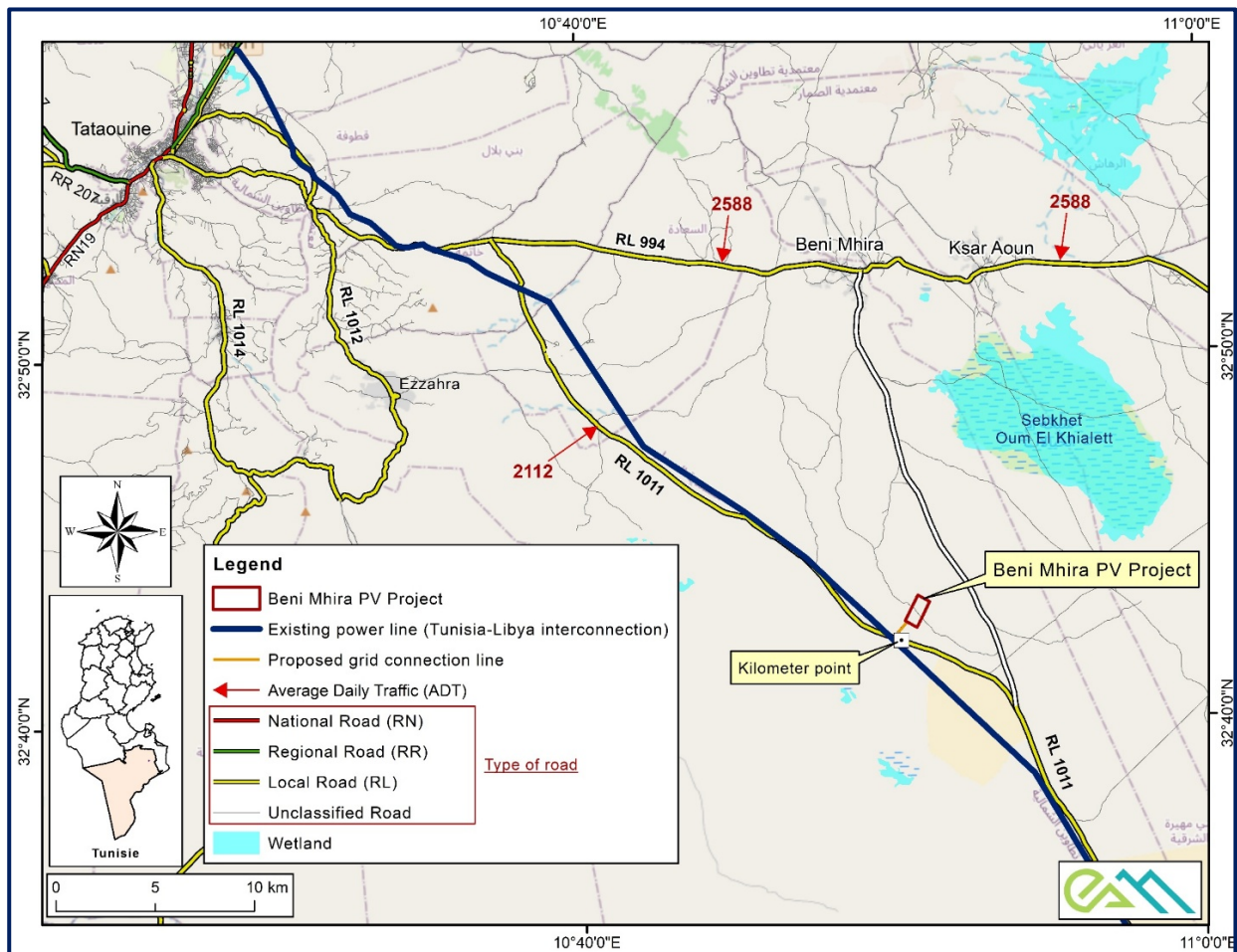


Figure 2-2 : STEG infrastructure and local road network

2.2 DESCRIPTION OF THE PROJECT COMPONENTS

2.2.1 Solar PV Plant

PV solar cells convert solar energy (radiation from the sun) into electricity using semiconductors (photovoltaic material that exhibit the photovoltaic effect); following the exposure of the PV panel to light, voltage is created in the material as photons from sunlight

excite electrons in those materials into a higher state of energy, allowing them to act as charge carrier for an electric current.

Solar cells produce Direct Current (DC) electricity from sun light, which can be used for grid connected power generation. However, electricity at the grid is usually in a different form (known as Alternating Current (AC)) and thus inverters are used to convert the DC current to AC current. In addition, cells produce electricity at a certain voltage which must be matched to the grid it connects to. Therefore, transformers are used to convert the output from the panels to a higher voltage that matches the grid.

The figure below presents the layout of the key components of the solar PV plant. It should be noted that the information shown is based on preliminary data and design details provided by the Developer.

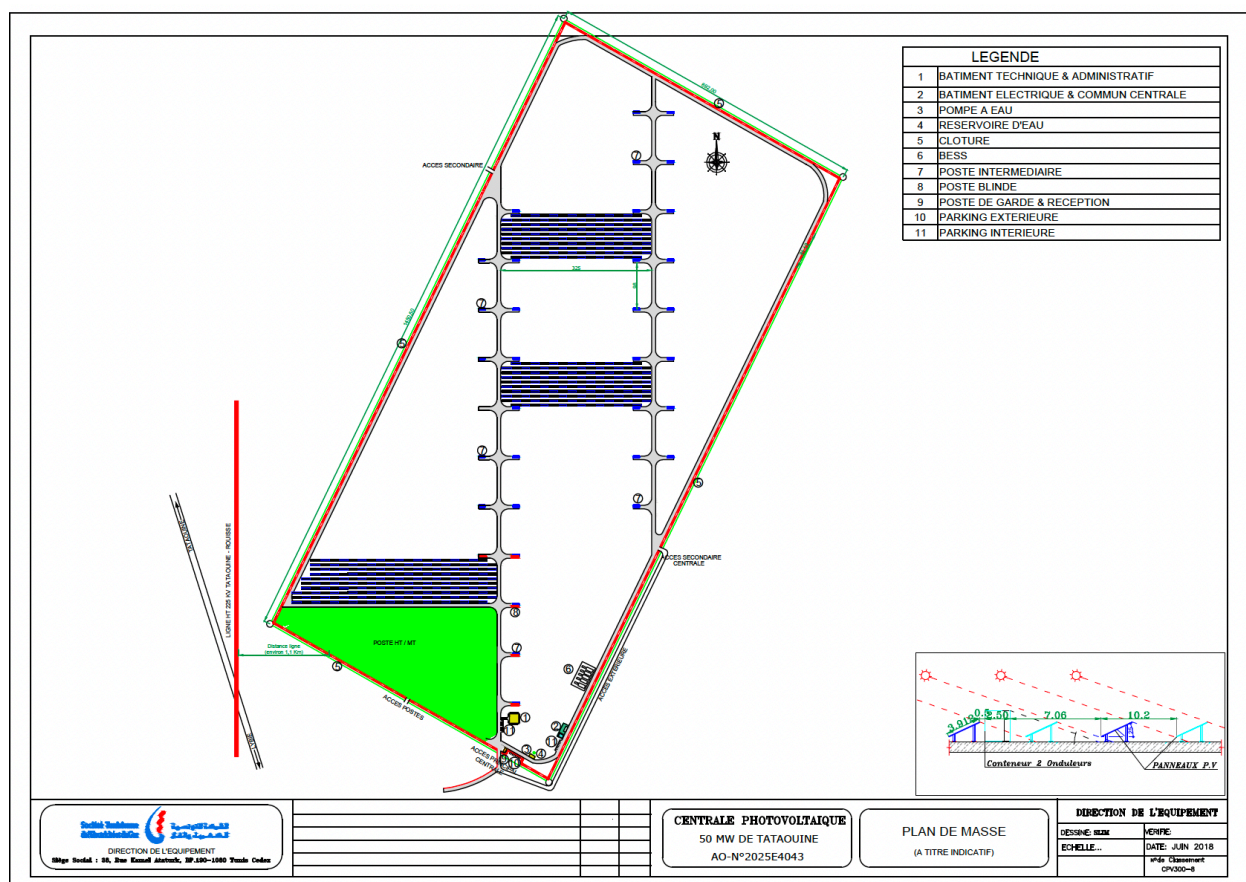



Figure 2-3: Layout plan for the solar PV Plant

2.2.2 Battery Energy Storage Solution

The Project will also involve the establishment of a 10MW/20MWh Battery Energy Storage Solution (BESS). The BESS will operate on an independent basis (separately from the PV plant) and be developed close to the existing sub-station.

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The BESS facility will serve the following main functions¹:

- Storage of electrical energy from power sources feeding into the project associated utility grid during off-peak grid time, and the dispatch of the operating reserves in the event of grid congestion (i.e., instances of power demand exceeding power supply).
- Stabilization of the frequency of the project-associated utility grid by provisioning power reserves to equalize power demand and power supply within the grid.

2.2.3 HV/MV substation (Hight Voltage / Medium Voltage)

The Project site will also include HV/MV substation for connecting and discharging the electrical energy produced.

2.2.4 Access Road

The PV site will also include a dedicated access road connecting the local road RL1011 to the Project site, with an approximate length of 1 km. This access road will be used during both the construction and operational phases.

2.2.5 Dimensions of the OHTL 225kV

The Project comprises the installation of a 1.2 km Overhead Transmission line with 3 summits (departure / arrival and corner pylons) linking HV/MV station to the National Grid through the Tataouine to Rouis (Libya). The number of pylons has been estimated between 4 to 5 and the distance between alignment pylons is between 350 and 500 m depending on the specific route and topography.

The footprint of the pylons is between 120 and 400 m² each as this depends upon the final type and design of pylon used. The location and spacing of the pylons will be decided by the EPC Contractor and so the actual land plots impacted by the OHTL pylons will not be known during the E&S Assessment.

Construction of the OHTL will comply with STEG's design criteria for minimum spacing:


(i) Minimum above-ground heights

Table 2-1: Minimum above-ground heights

Description	Minimal height
Ordinary terrain	8 m
Plantation (olive trees)	9 m
High traffic road	10 m
Railroads	11 m

(ii) Minimum distances from houses / dwellings

¹ Source: Compass Energy Storage

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For 225 kV high voltage lines, the horizontal distance measured from the line axis to the dwellings shall be at least equal to the following values:

Table 2-2 : Minimum distances from houses/dwellings

Description	Minimal distance
Immediate vicinity of Conductors	30 m
Immediate vicinity of the Towers	Height of the tower

(iii) Right of Way

- Electricity transmission and distribution projects require Rights-of-Way (RoW) to protect the system from windfall, contact with trees, branches, utilities, buildings, and other potential hazards that may result in damage to the system, or power failures, and also to protect local community residents and land users.
- During the planning phase of the OHTL, it is anticipated that a RoW ranging from 60 m (30 m on each side of the 225kV OHTL). It is recommended that STEG ensure that the regulatory framework and all necessary authorisations are in place to guarantee long-term compliance with the defined ROW. This includes confirming that land access rights, easements, and any relevant permits are legally secured and enforceable during operation.
- It is noted that, under current STEG’s technical standards, the standard RoW for a 225 kV transmission line is defined as: 14 m on each side of the line axis, and 25 m around pylons and associated infrastructure. The adoption of a 30 m RoW therefore represents a more conservative approach, consistent with EBRD Performance Requirements and international standards.

(iv) Minimum distances to roads

- A minimum distance of 40 m between the towers and the axes of agricultural roads.
- A minimum distance of 50 m between the towers and the axes of the classified roads.
- A minimum distance of 65 m between the towers and the axes of the highway.
- A minimum distance of 200 m between towers and road intersections.


For safety reasons during the unrolling works, the constructor must locate the anchoring towers at a distance (d) ≥ 150 m from classified roads.

2.3 SUMMARY OF PROJECT ACTIVITIES

The Project will be developed in a three-phase sequence:

2.3.1 Planning and Construction Phase

Construction activities are scheduled to begin in July 2026, with a construction phase lasting approximately **15 months**, covering all Project infrastructure. The project is expected to be

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operational in October 2027. The peak workforce during construction is expected to be 375 skilled and unskilled workers with priority given to local community.

The non-local workforce will be accommodated in a worker camp, or in housing in the village of Beni Mhira. The type and location of the facility used will be made by the EPC contractor.


2.3.2 Operational Phase (25 years)

This includes activities to be undertaken by the Project Operator. Activities expected to take place mainly include the normal daily operation of the PV Plant and the routine maintenance activities of the PV Project (e.g. PV module cleaning, inverter servicing, checks on structural integrity, storage and disposal of broken PV panels, etc.). Commercial operation of the Project is expected to commence in October 2027 and continue for a period of 25 years.

The workforce for the operational stage is expected to comprise 20 people, mostly skilled roles.

2.3.3 Decommissioning phase

After the 25 years operational period, several options may be considered for the next phase, including site rehabilitation and panel replacement, complete decommissioning, or alternative project configurations.

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3 PROJECT ALTERNATIVES

3.1 SITE SELECTION ALTERNATIVES

The land proposed for the development of the solar plant was voluntarily made available by the community land management of Zorgane. From a technical perspective, the site meets the key criteria required for solar PV development, including:

- The **site selection process** was initiated by the community land management of Zorgane, which voluntarily proposed Beni Mhira location to STEG for the development of the Project. This proactive approach represents a strategic advantage, as it enables STEG to extend its infrastructure into an undeserved and remote region.
- **Good solar irradiance:** Tataouine enjoys extremely favourable sunshine conditions, with average GHI (Global Solar Irradiance) ranging from 92.6 kWh/m² in December to 253.8 kWh/m² in July, with an annual average of 2,029.5 kWh/m² per year (2015-2024)
- **Proximity to the road network:** access to the project site will be from the regional road RR-1011.
- **Proximity to the electricity network:** The Project site is located approximately 1.2 km Existing 225 kV transmission line “Tataouine – Rouis (Libya)”.
- **Natural Landscape of the Site:** PV solar developments generally require a flat terrain for the installation of the various Project components to include the PV arrays. The Project area in general can be characterized as being dominantly of fairly flat surfaces and therefore site preparation and earthwork activities are not expected to be substantial.
- **Vast open lands:** The Project site is located in sparsely populated area, approximately 15 km from Beni Mhira local community. The Beni Mhira sector is characterized by vast open lands making it suitable large-scale power generation capacity.


3.2 BESS ALTERNATIVES

The option of integrating a BESS 10 MW/20MWh was evaluated as a means to reinforce the electricity supply to the nearby village of Beni Mhira. The installation of on-site storage could enhance the reliability of electricity supply by allowing excess solar generation to be stored during daylight hours and dispatched during periods of low solar production or peak demand.

3.3 THE “NO PROJECT” ALTERNATIVE

The “no Project alternative” assumes that the PV plant will not be developed. In this scenario, the area selected for the project would remain unchanged in terms of physical layout and land use. The site would retain its current characteristics as privately owned, undeveloped land used informally, mainly for extensive livestock grazing.


In the case of this project, it is important to weigh the significant positive impacts on the economy and the environment resulting from the development of the project against the

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negative environmental and social impacts expected at the specific site. The comparison clearly concludes that the "no project" alternative is not a preferable option.

4 PROJECT E&S AUTHORISATION PROCESS


Based on Decree no. 2005-1991 of 11 July 2005 on environmental impact assessment (EIA), which defines the categories of units subject to environmental impact assessment and the

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categories of units subject to specifications, only electricity generation units with a capacity of at least 300 MW are subject to EIA. Consequently, the project to build the Tataouine solar power plant and 10 MW /20MWH BESS with (TL), which has a capacity of 50 MW (less than 300 MW), does not require an EIA.

In accordance with the Order of the Minister of Industry, Energy, and Small and Medium-Sized Enterprises of November 15, 2005, establishing the nomenclature of dangerous, unhealthy, or inconvenient establishments as completed and amended by the Order of the Minister of Industry and Technology of February 23, 2010, and the Order of the Minister of Industry of October 24, 2012, the presence of battery energy storage solution, classifies the Project site as a third-category installation under Section 1601 (Accumulators), as the maximum direct current power exceeds 2.5.


Accordingly, a safety study is required. This study will be part of the application file for the classified facility permit and will primarily aim to assess the Project's compliance with applicable regulatory requirements and Civil Protection requirements.

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5 STAKEHOLDER ENGAGEMENT OUTLINES

During development of the ESAR, stakeholder consultations were undertaken with engagement conducted on January 12th, 2026 with the following key outcomes :

- Regional governmental entities: The Governor of Tataouine urged that the project proceed without delay and requested authorities to fast-track all required permits. The Delegate of Beni Mhira explained that the site lies on land voluntarily ceded by the Zorgane community and noted that one OHTL pylon crosses Mhamedia land, requiring constructive land discussions. The Regional Development Commission suggested exploring grazing corridors for camels and sheep. Civil Protection emphasized the need for a safety study due to the BESS, as the project falls under Category 3 (Accumulators).
- Beni Mhira community (men focus groups): Beni Mhira is a rural agricultural community that depends mainly on olive cultivation and livestock grazing, with no representation for semi-nomadic groups. The area lacks industrial activities, apart from a small salt-production operation. Residents reported several service deficiencies, including frequent electricity outages, unreliable drinking water, limited telecommunications, and the absence of civil protection services. Health infrastructure exists but is poorly equipped, notably the local health center which does not have an ambulance. Community members expressed interest in receiving training in renewable energy to improve their employment opportunities during the project.
- Beni Mhira community (women focus groups): Women are active in the public sector, traditional crafts such as Margoum weaving, and family farming. A recently established training center provides young rural women with professional training in sewing, hairstyling, aesthetics, and pastry. No cases of violence against women have been reported.

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6 KEY ENVIRONMENTAL AND SOCIAL BASELINE FINDINGS

6.1 CLIMATE

According to Le Houérou's (1967) bioclimatic classification, the proposed site of the Beni Mhira solar power plant and its associated transmission line is located within the Upper Saharan climate zone. Over the last decade, rainfall in the project area has ranged from 0.6 mm in July to 22.4 mm in November. The average annual temperature over the period 2015–2024 is about 22.2°C, with extreme temperatures ranging from approximately –2.8°C in winter to about 48.6°C in summer. The average annual global horizontal irradiation (GHI) is around 2,029.5 kWh/m². Relative humidity varies between 36% and 63%. Wind conditions are mainly influenced by winds from the northeast and south sectors, accounting for about 16% and 14.3% of occurrences respectively, with an average annual wind speed of approximately 3.03 m/s.

6.2 CLIMATE CHANGE RISK AND SOURCES OF NATURAL HAZARDS


The solar PV plant site has a dry climate and irregular rainfall, with no history of flooding, so it is not at risk of floods. In the Beni Mhira area of Tataouine, summer temperatures can go over 40 °C and reach up to 48.6 °C, creating a high climate risk, causing heat stress and lowering productivity during construction, and can also reduce the efficiency of solar panels during operation. The area is also exposed to sandstorms, like the one on 22 November 2022, with winds up to 94 km/h in Tataouine, which can temporarily stop construction and reduce solar power output because of dust, making it a medium to high risk. The site has low earthquake activity (intensities II to IV on the MSK scale) and is only slightly affected by lightning, with about one strike per km² per year.

6.3 AIR QUALITY AND NOISE

The Beni Mhira PV project site is located in a rural, arid, and sparsely populated area with good air quality, mainly influenced by natural mineral dust and occasional minor emissions from nearby roads. Ambient noise is low and intermittent, coming mostly from the wind and occasional vehicle traffic, with the nearest industry 9 km away and the closest community, Beni Mhira, about 15 km from the site.

6.4 LANDSCAPE AND VISUAL ASPECTS

The landscape is generally flat to gently rolling, typical of open Saharan environments. Soils are poorly developed, with frequent outcrops of the underlying geological substrate. Intensive grazing on the site has significantly reduced vegetation cover. The site is crossed by an unpaved track and, to the southwest, by the local RR1011 road and the Tataouine–Rouis (Libya) transmission line. To the east, the desert region of Dahar is distinguished by its Jebel, while to the north, Jebel Rehach slopes gently southwards towards the Sebket Oum El

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Khialat salt depression. Overall, the combination of plateaus, hills, and desert plains creates a varied visual setting while influencing the distribution of soils and vegetation.

6.5 NATURAL REGIONS, GEOLOGY, TOPOLOGY & GEOMORPHOLOGY AND SOILS

According to the map of natural regions, the study site is part of the El Ouara region and lies within the southeastern Tunisian sedimentary basin. It is mainly composed of Quaternary formations dating from the Middle to Upper Pleistocene, showing a succession of distinct layers: the surface layer (0 to -2 m) consists of beige to whitish gypsiferous silty tuff, sometimes accompanied by localized crusts; between -2 and -5 m, reddish gypsiferous silty sand is found; and the layer between -5 and -10 m is composed of clayey sand ranging from beige to reddish. The site's geomorphology is predominantly flat, with minor topographic variations, elevations ranging from 120 to 130 m, and slopes not exceeding 3%. However, wind erosion has locally promoted the formation of nebkhas, with the arid climate and exposure to prevailing winds enhancing these processes. From a pedological point of view, soils are poorly developed, with low organic matter and limited fertility, and gypsiferous soils are also present.

6.6 SURFACE WATER AND HYDROGEOLOGY


The study area is drained by intermittent wadis that remain dry for most of the year and flow towards Sebket Oum Khaylat, with water present only during occasional flash floods. Groundwater resources in the area are represented by two main aquifer systems: the phreatic aquifer of Oum El Khialet and the deep Triassic evaporitic aquifer (Middle Triassic dolomites). According to the DGRE 2015 report, the phreatic aquifer is accessed through 256 wells, extracting approximately 0.44 Mm³ per year, with an exploitation rate of 29% and a total dissolved solids content of 3 g/L, indicating that the aquifer is underexploited and has significant potential for sustainable use. The deep Triassic evaporitic aquifer provides about 2.8 Mm³ per year, of which 83% is used for agriculture and 1% for industrial purposes, leaving 12% available, with salinity ranging from 1.0 to 5.4 g/L. It is important to note that geotechnical drilling to a depth of 10 meters did not reach the phreatic aquifer.

6.7 BIOLOGICAL AND ECOLOGICAL RESOURCES

Habitats and flora, fauna and avifauna are based on the field survey conducted on 11 January 2026

Habitat and flora

the Project area is dominated by arid habitats with low structural complexity, patchy vegetation, and limited floral diversity, reflecting harsh soil conditions and low regeneration potential. the recorded flora species reflect a steppe and xerophytic vegetation community dominated by taxa adapted to water stress, salinity, and soil degradation. Most species are

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common across southern Tunisia, and no endemic, or threatened plant species according to the IUCN global red list (2025) were identified within the Project area

Fauna

All recorded species are classified as Least Concern (LC) or Not Evaluated (NE) under the global IUCN Red List (2025), and no endemic or nationally protected species were identified during the survey. The observed habitats are homogeneous, of low ecological complexity, and do not show any particular sensitivity.

Avifauna


The project area (Solar PV plant and OHTL Route) indicates a low ornithological carrying capacity, with an avifauna assemblage of sedentary and widespread species, and an absence of key functional groups suggesting a degraded ecosystem with limited ecological niches and reduced ecological sensitivity. During this winter survey no threatened or endemic species were recorded and no PBFs were identified. Given its degraded condition, the Project site is also unlikely to function as an important migratory stopover. Regional BirdLife data suggest the potential occurrence of raptors of conservation interest in the wider landscape, but their key habitats are associated with distant protected areas, making regular use of the Project site unlikely

6.8 PROTECTED AREAS

The project site and the OHTL route do not contain any protected areas within a 10 km radius, and the site's harsh environmental conditions (water stress, saline soils, and low vegetation cover) limit its ecological attractiveness. Although two protected areas are located more than 30 km away (Sidi Toui IBA and Oued Dkouk RAMSAR/KBA), their influence on the site is considered minimal, but additional surveys across all seasons are recommended to confirm the absence of associated bird species.

6.9 SPECIES OF CONSERVATION INTEREST

At this stage, no Critical Habitat has been triggered for any species of global or national conservation concern likely to occur within the Project Aol. Survey data to date do not indicate the presence of species or populations meeting the quantitative thresholds defined under EBRD ESR6. However, some avifauna species, while not directly recorded within the project area, are considered Priority Biodiversity Features (PBFs) due to their potential presence or known passage through the region. These include Bonelli's Eagle (Endangered nationally (ME 2022)), Egyptian Vulture (Endangered according to IUCN 2025 and Critically Endangered nationally (ME 2022)), Golden Eagle (Vulnerable nationally (ME 2022)), and Lanner Falcon (Endangered nationally (ME 2022)).

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6.10 SOCIAL BASELINE CONDITIONS

Socio-economic status of the population

According to the 2024 General Population Census, the Delegation of Beni Mhira has a population of 8 190 inhabitants living in 2 134 dwellings. The Governorate of Tataouine faces significant socio-economic challenges, with a high unemployment rate estimated at 24.8%, which rises to 28.5% among higher education graduates and reaches 42% among young female graduates. Employment is mainly concentrated in the services sector (59.5%), followed by construction (22.4%) and manufacturing (8%), while the local economy also relies on agriculture and livestock. The industrial sector is limited and dominated by 93 agri-food units, and tourism remains modest, with 14 establishments offering a total bed capacity of 581. Despite these constraints, access to basic services is high, with 98.7% of households connected to the electricity network. However, persistent structural challenges, including a poverty rate of 17.8%, higher than the national average of 15.2%, along with limited private sector presence, continue to hinder the socio-economic development of the region


6.11 LAND (PAST AND CURRENT USE, LAND TENURE, PERMANENT OR TEMPORARY ACQUISITION INCLUDING ANY LEGACY LAND ACQUISITION ISSUES)

The Developer (STEG) will construct the solar arrays and the BESS on land ceded by the community land management of Zograne “مجلس تصرف الزرقان”, the landowner, to STEG, covering an area of 100 ha. A purchase agreement was signed between the community land management of Zograne and STEG and registered on December 19, 2017.

The project site occupies bare land and covers an area of 100 ha. There is recent evidence of land use for grazing activities. Outside the PV site, there are three abandoned contemporary reservoirs and a recently built Majel-type reservoir have been identified to the west of the PV plant site.

Grazing activities are carried out by the community that has voluntarily made the land available to the project. The land is already fully degraded, and its current use is limited to extensive grazing. It should be noted that the environmental conditions within the project site are similar to those of the surrounding areas outside the site, with no distinctive land use or ecological value.


The OHTL will have 3 summits (these designate a change in the direction of the OHTL) and mainly crosses land belonging to the community land management of Zograne (1.1 km – 91%), the remainder crossing the lands belonging to the community land management of Mhamedia “محمدية”. The land intersected by the OHTL is used for grazing activities.

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6.12 ARCHAEOLOGICAL AND CULTURAL HERITAGE

The archaeological survey conducted on January 11, 2026, at the PV solar plant site and along the transmission line concluded the following:

- Two protohistoric funerary mounds were identified within the project plot, at waypoints 32.718088 N / 10.849859 E and 32.718438 N / 10.849938 E. Another tumulus, likely similar, was observed outside the plot, at waypoint 32.706542 N / 10.834482 E, approximately 150 m north of the proposed transmission line.
- In terms of tangible cultural heritage, three abandoned contemporary reservoirs and one recently constructed cistern of the Majel type were identified to the west of the PV plant plot, illustrating traditional knowledge related to the collection and management of rainwater.
- Finally, the region is distinguished by its natural and intangible heritage, notably dromedary breeding and the presence of open-air enclosures, reflecting traditional pastoral practices and the cultural significance of the Tataouine area.

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7 IMPACT ASSESSMENT AND MITIGATION MEASURES

7.1 IMPACTS DURING CONSTRUCTION PHASE

Assessment and management of environmental and social risks


- The construction of the PV solar power plant and the high-voltage line will temporarily cause local visual and landscape disturbances due to the presence of machinery, earthworks, temporary structures, and dust emissions. However, these effects will remain direct, localized, short-term, and fully reversible, as the site is distant from tourist facilities and sensitive viewpoints, with low visual sensitivity.
- The capital spends by the developer and the EPC contractor for the acquisition of materials and services (construction, PV equipment, BESS, OHTL, machinery, tools, PPE, catering, accommodation, and logistics) will lead to increased revenues and profits for the local companies involved. These expenditures could also result in a temporary increase in the workforce employed by these companies
- During construction, approximately 375 local workers, mainly from the Beni Mhira delegation, will be employed by the EPC contractor, directly benefiting from salaries and training opportunities in Health, Safety, and Environment (HSE). This experience will allow them to improve their skills and facilitate access to other jobs in the construction sector after the project. The impact is positive, contributing to the sustainable increase of household income and the development of local skills.

Labour & Working Conditions

- During the construction phase, the workforce, mainly local but including non-local workers, could be exposed to inadequate working conditions, including long hours, underpayment, poor-quality accommodation, and risks of gender-based sexual harassment (GBVH). These conditions can affect workers' health, well-being, safety, as well as their income and legal benefits. To address this, the project includes comprehensive measures: accommodation compliant with IFC/EBRD standards, mandatory HSE training, a Code of Conduct, grievance and reporting mechanisms, regular monitoring, and awareness-raising on workers' rights and GBVH prevention. Clear HR policies and transparent recruitment procedures promoting local workers and the inclusion of women will be applied, along with supply chain monitoring. Overall, these measures aim to reduce negative impacts, protect workers' well-being, and ensure compliance with legislation and international best practices

Resource efficiency and pollution prevention and control

- The construction of the PV plant and the high-voltage line will cause localized disturbances to the soil and geomorphology due to earthworks, excavations, and the installation of pylons, but the flat terrain limits the extent of the impacts. The use of fuels


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and lubricants carries a risk of localized contamination, which will be managed through prevention and supervision measures. With proper management and cleaning protocols, most soil impacts will be reversible, although significant spills could have long-term effects

- The construction of the PV plant and the high-voltage line will temporarily generate dust, diesel emissions, and noise associated with machinery, excavations, and equipment transport. These nuisances will be limited and managed through the Pollution Prevention Management Plan, including dust suppression, equipment maintenance, and work scheduling. Given the low population density and the absence of sensitive receptors nearby (the nearest village is 15 km away), the impacts are considered minor.
- Water will be used temporarily during construction for concrete, dust suppression, and personnel needs, with moderate volumes (approximately 3,000 m³). The Oum El Khialet phreatic aquifer is underexploited, ensuring sustainable and reversible water use for the project.
- During construction, the project will generate both hazardous and non-hazardous waste, with volumes expected to remain limited. Non-hazardous waste will be sent to regional landfill sites, while hazardous waste will require secure on-site storage and transport to approved facilities, sometimes outside the region. Improper management could lead to soil and groundwater contamination, but with a strict Waste Management Plan and proper practices, these impacts are avoidable.

Health, safety and security

- The construction of the project exposes workers to various occupational risks, including falls, electrocution, injuries, heat stress, and venomous animal bites, in a desert and rural context. These risks may lead to temporary or permanent impacts on health and safety. The EPC will implement an Occupational Health and Safety Management Plan, an Emergency Response Plan, and a Worker Accommodation Plan in accordance with IFC/EBRD standards, including training, protective equipment, monitoring, and audits. These measures aim to reduce accidents, protect workers' health, and enhance their skills for future employment.
- In the Beni Mhira region, Tataouine governorate, summer temperatures can become very high, regularly exceeding 40°C and sometimes reaching 45 to 46°C or even higher (an absolute record of 48.6°C was recorded in July between 2015 and 2024), during intense heat waves recorded in southern Tunisia, including Tataouine (source: INM). These extreme thermal conditions are classified as a high climate risk for the area, with an increased risk of heat stress for outdoor workers and a decline in productivity during the project's construction phases.

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- During the construction phase, the transport of materials, equipment, and personnel on public roads, as well as the use of construction machinery, presents risks to the health and safety of pedestrians, road users, and property owners. These risks include accidents, injuries, fatalities, or property damage, with local and regional extent and medium significance. Management measures will be implemented, such as traffic planning, temporary signage, vehicle control, and awareness-raising for drivers and the public. Community grievance mechanisms, internal training, and regular monitoring will ensure safety and minimize impact


Biodiversity conservation and sustainable management of living natural resources

- The construction of the PV plant and the high-voltage line will require the clearing of vegetation for infrastructure, access roads, and pylon foundations, causing direct and indirect ecological impacts. The project area is located in an arid to hyper-arid environment with low vegetation cover (less than 5%) and habitats of low ecological value, mainly open steppes, wastelands, and bare areas. No endemic or nationally or globally threatened plant species were identified on the site.
- The construction of the PV plant and the high-voltage line will cause direct and indirect impacts on the local terrestrial fauna, notably through vegetation clearing, earthworks, trampling, and trench excavation. Faunal diversity is low and mainly consists of species adapted to desert conditions, with no endemic or threatened species. With appropriate mitigation measures such as relocation of small animals, installation of wildlife-friendly fencing, and staff training, these impacts will remain localized, temporary, and manageable
- During construction, project activities may disturb the local birdlife through noise, vibrations, vegetation clearing, and temporary habitat modification, causing bird displacement and potential degradation of nesting and feeding sites. The winter inventory shows low diversity of sedentary and disturbance-tolerant species, with no threatened or endemic species on the site. Although some raptors of conservation interest may occur in the regional landscape, their primary habitats are distant, making their use of the project site unlikely.

Land acquisition restrictions on land use and involuntary resettlement

- The PV solar power plant and transmission line project will be implemented on land that is already highly degraded and voluntarily provided by local communities, with no expropriation or displacement. This land has no particular ecological, productive, or infrastructural value. The impact on land access and existing land uses is therefore negligible.

Cultural Heritage

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- The archaeological survey identified two protohistoric tumuli on the site and another nearby, as well as several traditional reservoirs illustrating rainwater management. Construction could damage these resources, resulting in a direct and potentially irreversible local impact. To minimize risks, sensitive areas will be demarcated, supervised by archaeologists, and a chance find procedure will be applied for any unexpected discoveries. In the event of significant finds, the competent authorities will decide on appropriate measures, including preservation, conservation, or controlled exhumation of human remains. The project also provides an opportunity to enhance the understanding and valorization of local cultural heritage.

7.2 OPERATIONAL PHASE

Assessment and management of environmental and social risks


- The project will positively impact the regional and national economy through local procurement, tax revenues, and employment opportunities for the Beni Mhira community, including women, youth, and vulnerable groups. It will also enhance electricity access and grid reliability, diversify energy supply, reduce fossil fuel dependence, and support the growing energy needs of neighboring communities

Labour & Working Conditions

- The integration of the supply chain into the project presents a risk of non-compliance with labor laws by contractors and subcontractors, including poor working conditions, child or forced labor, and exploitation of vulnerable persons. This risk is indirect but persistent as long as subcontractors are involved in operation and maintenance. It can be mitigated through strict controls, regular audits, a supplier code of conduct, and grievance mechanisms for workers. With these measures, the project can prevent violations and maintain legal compliance and its reputation.

Resource efficiency and pollution prevention and control

- During operation, around 20 workers will maintain the PV plant, consuming a small amount of water (120 m³/year). Modules will be primarily cleaned using a dry method to minimize water use. The impact is minor, local, and reversible, as water consumption is low and sourced from a non-sensitive area. Mitigation includes coordinating with authorities, using waterless cleaning, monitoring consumption, and preparing a water management plan.
- During operation, the PV plant and OHTL will generate small amounts of hazardous, municipal, and technical waste, as well as limited sanitary wastewater. Waste will be collected, sorted, and transported to approved facilities, minimizing environmental impacts. The impact is minor, local, and reversible, provided proper management is implemented. Mitigation measures include monitoring waste management, using sealed

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tanks for wastewater, tracking waste, and inspecting third-party transporters and treatment facilities

Health, safety and security

- During the operational phase, the main issues relate to occupational health and safety, exposure to electromagnetic fields (EMF), and fire risk, particularly in connection with the Battery Energy Storage System (BESS). As operations are largely automated, risks mainly arise during maintenance activities, including working at height, live electrical equipment, BESS-related hazards, slips, falls, and fire. EMFs generated by the PV plant, substation, BESS, and OHTL remain well below international exposure limits and do not pose a significant risk to nearby communities. Fire risk, although low, is controlled through strict preventive measures such as cooling systems, fire detection, appropriate firefighting equipment, vegetation management, and continuous site monitoring.
- The BESS is classified as Category 3 – Accumulators (Category 1601) and therefore requires the preparation of a dedicated Safety Study, in accordance with the requirements of the Tunisian Ministry of the Interior. This Safety Study will identify major accident scenarios, assess associated risk levels, define prevention, protection and emergency response measures, and ensure the Project’s compliance with Civil Protection requirements.
- During operation, intense heat waves (regularly exceeding 40°C) can also affect the efficiency of photovoltaic modules (whose output decreases with heat) and increase the demand for thermal management of the facilities.
- Overall, through the implementation of a project-specific Occupational Health and Safety Plan, an Emergency Preparedness and Response Plan, and a dedicated BESS Safety Study, and by complying with national and international standards, operational risks are considered manageable and acceptable.

Biodiversity conservation and sustainable management of living natural resources

- During operation, activities are limited to maintenance and inspections of the PV site, causing minimal ecological disturbance. The shade created by the panels promotes vegetation regeneration and the creation of microhabitats, providing co-benefits for local fauna, particularly reptiles and small mammals. Mitigation measures include natural recolonization, ecological awareness training for staff, waste management, and wildlife-friendly fencing design. Annual vegetation monitoring will ensure regeneration and assess the effectiveness of the implemented measures.
- During operation, the main potential impact of the overhead transmission line is the risk of bird collision and electrocution, but the short 1.2 km line, the degraded condition of the site, and the absence of threatened species make this risk low. The impact is direct and

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irreversible for affected individuals but limited to the local area and of low magnitude. Regular bird monitoring, the installation of alternative nesting platforms, and documentation of any incidents will help mitigate the risk. Measures will be adjusted based on the results of the first two years of monitoring and subsequent ornithological Social Environment

7.3 DECOMMISSIONING PHASE

The decommissioning of the PV plant will involve the removal of structures, technical equipment, cables and fencing, with environmental and social impacts similar to those identified during the construction phase. A decommissioning plan shall be prepared in advance, prioritising the recycling of project components and, as a last resort, disposal in approved waste management facilities in Tunisia. The implementation of such a plan, in line with international good practice and EBRD requirements, will ensure that environmental and social impacts at the end-of-life phase of the Project are properly managed.

7.4 CUMULATIVE IMPACT ASSESSMENT SUMMARY

The ESAR assessed the cumulative impacts related to other existing or planned projects in the region. Although no large-scale photovoltaic plants are located within a 50 km radius, a few small local installations, including a 1 MW plant in Bir Thalathine, have been identified, but their direct cumulative impact with the Beni Mhira Project is considered negligible. Several medium- to large-scale photovoltaic projects, including a planned 200 MW plant under the national “500 MW PV” program, are still in the planning phase and located more than 50 km away, which greatly limits any direct cumulative effects on the site.


7.5 IMPACTS SUMMARY

The purpose of this section is to assess the impacts that are expected to occur during construction and operational phases. During decommissioning phase, the impacts are very similar to the construction phase but generally shorter in duration

Table 7-1 :Assessment of residual impacts during construction

Impact title	Initial impact	Management Plan with the control measures	Residual impact
<i>Impact on the physical environment</i>			
Landscape and visual setting The physical presence of the Solar PV plant and OHTL will alter the landscape and have visual impacts.	Minor	(none)	Negligible
Soil, groundwater and surface water drainage The presence and operation of heavy machinery inside the PV site, at pylon locations, and along temporary access roads, leading to changes in the geology and geomorphology of the area, causing soil disturbance and degradation. The use of machinery leading to local contamination from leaks and spills	Minor	Specifics mitigation measures Pollution Prevention Management Plan (The prevention of soil, groundwater and surface water contamination)	Negligible
Air and noise emissions The generation of air and noise emissions from construction machinery leading to the generation of a nuisance and air pollution.	Negligible	Pollution Prevention Management Plan	Negligible
Water resources The use of water for cement mixing and the workforce leading to a reduction in the availability of this resource to other users.	Low	Water resources Management Plan	Minor
Waste and wastewater	Moderate – due to the lack of regional disposal facilities for hazardous waste, even if this is to be generated in small quantities.	Pollution Prevention Management Plan (Wastewater and drainage) Waste Management Plan	Minor
<i>Impacts on the biological environment</i>			
Potential impacts on habitats and species of flora	Minor	Specifics mitigation measures for Biodiversity Conservation and Sustainable Management of Living Natural Resources	Negligible
Potential impacts on fauna	Minor		Negligible
Potential impacts on avifauna	Minor		Negligible


Impact title	Initial impact	Management Plan with the control measures	Residual impact
<i>Impacts on social environment</i>			
Land acquisition, restrictions on land use and involuntary resettlement land access restrictions	Negligible	Land access agreements Stakeholder Engagement Plan (SEP) and Project Grievance Mechanism	Negligible
Archaeology and cultural heritage	Moderate as potential presence of tumuli within a limited area of the proposed project site	Chance find Procedure	Minor
Labor and working conditions	Moderate – as the entire workforce will potentially be exposed to poor working conditions.	Worker Accommodation Plan Worker Code of Conduct Worker Grievance Mechanism Human Resources Management Plan and human resources policies	Minor
Potential labor violations within the supply chain	Major – as the suppliers to be used are unknown.	Supply Chain Management Plan	Minor
National, Local and Regional Economy The capital spend by the EPC Contractor on businesses supplying materials and services, leading to an increase in revenue to the owners of the businesses used and potentially an increase in their workforce.	Minor (+)	(none)	Minor (+)
Employment and management of the workforce The use of an installation workforce from the generation or continuation of employment, and the provision of training opportunities, leading to a sustained or increase in household income.	Moderate (+) as the continuation of employment will benefit the household and reduce their socio-economic vulnerability	(none)	Moderate (+)
Employment and management of the workforce The generation of a limited number of local employment opportunities, leading to intra- and inter- community tensions arising from high expectations of the number of local employment opportunities.	Major – As the decision as to ‘who’ is offered a temporary position (and therefore ‘who is not’ provided with such an opportunity) could result in protests and frustration towards the Project	Local Recruitment Plan Human Resources Management Plan and human resources policies	Minor
Community health and safety risks from road transport The road transport of materials and personnel using the public road network, use of construction machinery, and the presence of excavations, leading to health impacts to pedestrians and other road users, and local people.	Moderate – as Tunisia has a poor road safety record and adjacent land users may not be familiar with frequent large truck movements taking place along local roads.	Traffic and Transport Management Plan	Minor
The occupational health and safety risks to the workforce leading to injuries or fatalities.	Moderate – as mistakes made could have fatal consequences	Worker accommodation Plan Occupational Health and Safety Management Plan Emergency Response Plan	Minor

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Impact title	Initial impact	Management Plan with the control measures	Residual impact
		Avoid carrying out excavation work in harsh weather conditions (heavy rain (1 mm for at least one hour or 10 mm cumulative daily), wind (60 km/h), temperatures: below -2°C, extreme temperatures and fog.	
The use of security personnel to guard equipment and other areas leading to a reduction in the wellbeing of local residents	Minor	Security Management Plan Security Personnel Code of Conduct	Minor

Table 7-2 : Assessment of residual impacts during operational phase

Impact title	Initial impact	Management Plan with the control measures	Residual impact
<i>Impacts on the physical environment</i>			
Water requirements	Minor	Environmental and Social Management Plan	Negligible
Solid and liquid waste	Minor	Environmental and Social Management Plan	Negligible
<i>Impacts on the biological environment</i>			
Potential impacts on Flora and Terrestrial Fauna from maintenance activities and permanent infrastructure (PV plant and OHTL)	Minor	Specifics mitigation measures for Biodiversity Conservation and Sustainable Management of Living Natural Resources	Negligible
Potential impacts on avifauna from collisions between birds and bats with the OHTL wires.	Minor	Specifics mitigation measures for Biodiversity Conservation and Sustainable Management of Living Natural Resources	Negligible
<i>Impacts on social environment</i>			
Local and regional economy	Moderate – as the continuation of employment will benefit the household and reduce their socio-economic vulnerability.	(none)	Moderate (+)
Improving access to and reliability of electricity through the development of renewable energy production infrastructure.	Major - Due to its regional scope, sustainability, and social benefits.	(none)	Minor (+)
Potential labor law violations within the supply chain	Moderate - If no preventive measures are put in place, the risk may materialize and affect the project's reputation and legal compliance.	Supply Chain Management Plan	Minor
The generation of occupational health and safety risks to the workforce leading to injuries or fatalities.	Moderate	Occupational Health and Safety Management Plan Preparedness and Response Plan (EPRP)	Minor

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Impact title	Initial impact	Management Plan with the control measures	Residual impact
Potential impacts on human health related Electromagnetic Fields (EMF)	Negligible	Occupational Health and Safety Management Plan	Negligible
Fire risk	Minor to moderate – Technically low risk but requiring rigorous prevention, detection, and rapid response measures.	Fire risk prevention and management plan Emergency preparedness and response plan	Minor to moderate

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8 MANAGEMENT OF IMPACTS AND ISSUES

The purpose of this section is to outline measures to avoid, minimise, mitigate, or compensate for environmental and social impacts to acceptable levels. The measures are described under the title of a management plan.

8.1 STEG'S EXISTING ESMS AND INTERNAL ORGANISATIONAL CAPACITY

STEG has an E&S Management Framework (May 2020) for the Energy Sector Improvement Project which describes the various processes and procedures for managing E&S risks and impacts in accordance with the World Bank's E&S Framework.

To implement its Environmental and social Management System (ESMS), STEG has established the following elements:

- Safety and Environment Department (Direction Sécurité & Environnement (DSE)). Operationally, the DSE provides assistance, training, conducts audits and inspections, and raises staff awareness of E&S issues.
- Central Equipment Division (Direction Centrale de l'Equipement (DCEQ)) which oversees the construction phase of all STEG and is also responsible for implementing and monitoring E&S requirements on construction sites, in alignment with the DSE.

8.2 MANAGEMENT PLANS DURING CONSTRUCTION PHASE


The following project-specific management plans must be designed and implemented to manage impacts prior to the start of construction.

The following will be developed by the STEG (Developer):

- HR policies and procedures that reflect the combined requirements from Tunisian legislation and ESR2, including a Worker Grievance Mechanism.
- Permit and Consents Register.
- Stakeholder Engagement Plan and Project Grievance Mechanism.
- Environmental and Social Management Plan.
- Contractor Management Plan.
- Emergency Preparedness and Response Plan (EPRP).

The following management plans will be developed by the EPC contractor:

- HR policies and procedures
- Local Recruitment Plan
- Utilities Management Plan
- Worker Code of Conduct and Security Personnel Code of Conduct
- Worker Grievance Mechanism
- Human Resources Management Plan and human resources policies
- Worker Accommodation Plan (if required)

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- Security Management Plan (if required)
- Emergency Preparedness and Response Plan
- Occupational Health and Safety Management Plan
- Traffic and Transport Management Plan
- Pollution Prevention Management Plan
- Waste Management Plan
- Chance Find Procedure
- Training Plan
- Supply Chain Management Plan
- Change Management Procedure
- Community Health and Safety Plan


8.3 MANAGEMENT PLANS DURING OPERATIONAL PHASE

During operation of the Project the management of impacts identified shall be integrated into an Operations ESMS, using the Construction ESMS as a basis. The Operations ESMS shall include the following management plans:

- Stakeholder Engagement Plan and Project Grievance Mechanism to provide information to stakeholders during operation of the Project, in the form of an Annual Environmental and Social Performance Report.
- Worker Code of Conduct.
- Worker Grievance Mechanism.
- Human Resources Management Plan.
- Emergency Response Plan.
- Occupational Health and Safety Management Plan.
- Pollution Prevention Management Plan.
- Supply chain management plan.
- Local Employment Plan.
- Community Management Plan.

8.4 MANAGEMENT PLANS DURING DECOMMISSIONING PHASE

It is recommended that STEG develops and adopts a comprehensive decommissioning plan. This measure will ensure that environmental and social requirements associated with the end-of-life phase of the Project are adequately addressed, in line with international good practice and lenders (EBRD) requirements.

	NON-TECHNICAL SUMMARY (NTS)	MARCH 2026
	50 MW SOLAR AND 10 MW/20MWH BESS WITH ASSOCIATED TL	VERSION:01
	PROJECT IN BENI MHIRA, GOVERNORATE OF TATAOUINE	PAGE:38 /38

9 COMMUNICATIONS

The Project is classified as Category B considering EBRD’s Environmental and Social Policy (ESP, 2024), which means that a comprehensive ESAR and review of associated documents must be carried out, followed by their public disclosure for a minimum period of 30 days.

STEG intends to disclose, as a minimum, the following Project disclosure package:

- The Non-technical Summary (this report);
- The Stakeholder Engagement Plan (SEP);

STEG Website: <https://steg.com.tn/>

The documents will remain available on STEG and EBRD websites for a period of 30 calendar days prior to the project being reviewed by the EBRD Board of Directors and will remain available to the public throughout the duration of the project.

STEG has implemented a grievance mechanism that can be used by any person or group who wishes to raise a concern or request additional information. A complaint can be received in several forms and through different channels:

- by post to the following address: 38 Kamel Ataturk Street, 1080 Tunis, Tunisia
- by e-mail (wbenkhaled@steg.com.tn)
- by telephone call to: Project Manager and Head of department DPEC/DEMPE/DCEQ: Wajdi BEN KHALED (+216) 27 633 222.