



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 01/02/2020 | Report No: ESRSA00315



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Tunisia	MIDDLE EAST AND NORTH AFRICA	P169955	
Project Name	TN-Sustainable Oasis Landscape Management Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	12/2/2019	3/25/2020
Borrower(s)	Implementing Agency(ies)		
	Ministry of Local Affairs and Environment - DGEQV		

Proposed Development Objective(s)

To strengthen integrated management of oasis landscapes in targeted governorates in Tunisia.

Financing (in USD Million)	Amount
Total Project Cost	65.75

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The economic policies of the two decades preceding the 2011 revolution delivered widely recognized achievements, including growth rates above the regional average, impressive progress in human development indicators and reduced poverty. However, they failed to address, and even exacerbated, the deep-rooted distortions in the economy that closed the channels—in particular, productive employment and job creation—for a more equal and inclusive society.



The proposed operation is in line with the Government’s development vision and reform agenda and will strongly support recent sectoral policies and strategies, namely: (i) Strategy for Sustainable Development of Oasis Ecosystems (2015) and its Plan of Action, which is based “on the principles of territoriality, integration and participation of all stakeholders as well as the empowerment of local operators' organizations”; (ii) the strategies, plans and action plans arising from the strategic development study of the greater southern region, 2015-2035 elaborated by the South Development Office; and (iii) the National Strategy for the Green Economy. This project seeks to address some of these constraints by supporting the intensification of localized sustainable production and improving market access for the beneficiary group (i.e. the local bottom 40 percent), while reducing pressure on the overall fragile oasis landscape of these lagging regions. Through improved oasis landscape management in targeted regions, the project aims to shift the incentives towards a win-win situation by improving incomes for beneficiaries, while simultaneously regenerating agricultural, and pastoral areas of the southern region. Oasis ecosystems including rangelands have high potential for addressing rural economic diversification and employment creation needs through the promotion of ecotourism customized to their specific characteristics, fragility, and the diversity of their natural, human, and cultural resources. The proposed operation will set up a holistic and integrated territorial approach for transformational change leading to inclusive development, shared growth and sustainable development of oases ecosystems. Indeed, these ecosystems will be resilient to climate change only if the equilibrium between their natural resources and human communities is maintained. The sustainability of these areas depends largely on the proper use of the available water, soil and biodiversity. . The Project will be implemented in all of the 267 Tunisian oases, of which 141 are considered modern and 126 traditional. Tunisian oases, which shelter about 10 percent of the total Tunisian population, cover a total area estimated at more than 41,000 ha from the Mediterranean coast to the East, down to the dunes of the Grand Erg Oriental in the West and from the mountainous chain of Gafsa in the North to the Saharan dune fields in the South. Oases are mainly concentrated in four governorates: Gabes (49 traditional oases); Gafsa (7 traditional oases and 6 modern); Kébili (41 traditional and 71 modern); and Tozeur (29 traditional and 64 modern). According to their geographical situation, three types of oases have been identified in Tunisia: coastal oases (17% of the total area of the oases), mountain oases (6% of the total oasis area) and Saharan oases (77% of the total oasis area) - all including traditional and modern oases. In these four southern governorates, the 267 oases represent 9% of total irrigated land, 0.8% of the country's agricultural land, 30% of irrigated tree area, 25% of irrigated forage crops, and 10% of irrigated vegetable crops. In these oases, the areas are of the order of 41,000 ha which are spread over 54,000 plots for 50,000 farmers, i.e., an average area per plot of 0.75 ha and 0.82 ha on average per oasis. The Project Development Objective (PDO) of the proposed operation is to strengthen integrated management of oasis landscapes in four targeted governorates in Tunisia. A holistic, system-wide approach will aim at integrating both horizontal (water, land and other natural resources) and vertical (food value and supply chain) dimensions. A range of entry points, identified and defined through a bottom-up, participatory approach, will meet national priorities to transform food and land-use systems in a manner that generates multiple global benefits. Furthermore, the approach will contribute to the creation of an environment conducive to large-scale restoration of degraded oasis ecosystems landscapes for sustainable production and ecosystem services, contributing to land degradation neutrality in Tunisia and supporting Tunisia’s commitment to the National Action Program to Combat Desertification and based on investment designed to scale-up and out best practices. In this frame, mitigating measures for potential leakage (negative offsite effects as opposed to positive spillover effects) beyond the project area will also be considered. While some investments will be implemented at the governorate level and will benefit all stakeholders, this component will also provide financing grants to support strategic and technically feasible investments (subprojects) that emerge from PDPOs. Activities are exclusively related to water, soil and agriculture improvement and rangeland management, livelihoods diversification, and renewable Energy and small infrastructure. The Project Operational Manual will spell out funding mechanisms, eligible investments, eligible project promoters, and evaluation and



performance criteria. The main objective is to foster sustainable regional investments and economic growth through the provision of co-financing grants. These grants will in turn finance the acquisition of goods, technical assistance, infrastructure improvement, technical studies, and training. The direct beneficiaries of this component are local communities, farmers, and their organizations. Strategic investments (subprojects) that emerge from territorial planning (particularly from PDPOs) will be supported to sustain key entry points.: Sub-component 2.1: Sustainable Water and Land Management practices and biodiversity conservation Sub-component 2.2: Basic infrastructure assets and Energy breakthroughs for renewable energy Sub-component 2.3: Improving economic development and local livelihoods Component 3: Project Coordination and Management, and Monitoring and Evaluation The duration of the proposed Project is five years. The total cost is estimated at about USD 75 million

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The Project will be implemented in all of the 267 Tunisian oases, of which 141 are considered modern and 128 traditional. Traditional oases are characterized by fragmented and reduced parcels ; high density of palm trees (>200 trees/ha); predominance of common varieties; sharecropping system; earth irrigation systems; high density of fruit trees and great diversity of species; household economy oriented. Modern oases, are characterized by private plantations covering more than a third of the total irrigated area in the oasis regions - the promoter pays for all the facilities, including planting and water. Tunisian oases, which shelter about 10 percent of the total Tunisian population, cover a total area estimated at more than 41,000 ha from the Mediterranean coast to the East, down to the dunes of the Grand Erg Oriental in the West and from the mountainous chain of Gafsa in the North to the Saharan dune fields in the South. Oases are mainly concentrated in four governorates: Gabes (49 traditional oases); Gafsa (7 traditional oases and 6 modern); Kebili (41 traditional and 71 modern); and Tozeur (29 traditional and 64 modern). In terms of geographical locations, three types of oases have been identified in Tunisia: coastal oases (17% of the total area of the oases), mountain oases (6% of the total oasis area) and Saharan oases (77% of the total oasis area) - all including traditional and modern oases. The potential direct beneficiaries of the are estimated at about 1,1 million people, or about 200,000 households, which are exposed to a persistent downward impoverishment trajectory, due to numerous factors, such as: growing production costs; decreasing size of family land; reduced quotas of water for irrigation and deteriorating terms of trade for agricultural products.

Traditional oases are mainly threatened by unsustainable land management practices; overexploitation of water resources; the extension of palm groves (with consequent waterlogging of the irrigation network); increased salinization of soils; loss of soil fertility; invasion of land and habitat by sand; loss of biodiversity; fires; illegal exploitation of collective land systems (where water is technically accessible at low cost and high short-term economic benefits); proliferation of illegal drilling; the development of monoculture plantations (Deglet Nour); urbanization at the expense of cultivated areas; overexploitation of rangelands around oases; the uncontrolled tourism development (with overexploitation of natural resources, especially water); the virtual absence of waste management practices; non-compliance with phytosanitary regulations; poor control of water quality (for irrigation and human use).

Any activity funded under : Component 1, Improve the environmental and economic management of oasis landscapes and its Sub-component 1.1: Promoting oases as part of the national heritage; Component 2, and its Sub-component 2.1: Sustainable Water and Land Management practices and biodiversity conservation Sub-component 2.2: Basic infrastructure assets and Energy breakthroughs for renewable energy Sub-component 2.3: Improving economic



development and local livelihoods may cause risks/impacts and are relevant to the ESSs. Notably: ESS1 (Assessment of Management of Environmental and Social Standards); ESS2 (Labor and working conditions); ESS3 (Resource Efficiency and Pollution Prevention and Management); ESS4 (Community Health and Safety); ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement); ESS6 (Biodiversity Conservation and systematic Management of Living Natural Resources); ESS8 (Cultural Heritage); ESS10 (Stakeholder Engagement and Information Disclosure. Component 3 is: Project Coordination and Management, and has two sub-components; Subcomponent 3.1: Coordination, Management and Monitoring & Evaluation and Subcomponent 3.2: Communication.

D. 2. Borrower’s Institutional Capacity

The borrower (the Ministry of Local Affairs and Environment) has laid a solid institutional foundation for managing environmental and social risks, through the 6 pilot Oasis project. Actions taken include: i) avoid activities that are susceptible to inducing land acquisition; ii) training of PIU staff and other beneficiaries in environmental and social risk management; iii) preparing, implementing, monitoring and evaluating project investments through a stakeholder engagement mechanism; iv) preparing periodic reporting. As in the pilot Oasis project, the day to day monitoring of Environmental and social mitigation measures will be carried out by the beneficiary associations and the regional focal points who, summarized the various reports into monthly progress reports submitted to the PMU coordinator. The institutional organization for E&S management risks for this project is as follow:

A dedicated E&S senior specialist at the PIU in the central level and at least 4 E&S regional experts will be responsible for: (i) Preparing the Simplified data sheet (ii) preparing TORs and hiring consultants to prepare the Environmental and social Management Plans (ESMPs) and the Resettlement Plans (RP) as needed; (iii) ensuring that all ESMPs/RPs and other mitigation measures are included in bidding documents ; (iv) monitoring the implementation of ESMPs/RPs (v) periodic reporting on the E&S risk management to the World Bank.

Likewise, as in the pilot project, a consultant will be hired on a full-time basis the first year of project implementation to assist the PMU coordinator to ensure compliance in the preparation and implementation of the simplified data sheets, the ESMF and the RFP, in particular; (i) reviewing the ESMF and RPF implementation reports; (ii) reviewing and synthesizing the environmental and social monitoring reports received from regional coordinators; (iii) conducting periodical supervision of subprojects and (iii) preparing progress reports on the implementation of the ESMF and the RPF. The contract of the consultant will be switched to part time consultancy for the following two years. The project will support the PIU at central and regional level and all other stakeholders with a strong capacity building program.

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II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

Based on the PAD and the outputs of the ESMF, the Project is classified as Moderate Risk. The Project is not highly complex, its ES scale and impact is large to medium and the effects of the Project on areas of high value or sensitivity as the traditional oases are expected to be lower than High Risk Projects. The potential for indirect and cumulative impacts exist, but they are less severe and more readily avoidable or mitigated than for High or substantial Risk Projects. Even the impacts of sub activities to be funded by the project are expected to be positive, the specificity of Oases ecosystems make that some risks/impacts are identified mainly linked to Biodiversity degradation, soil quality



degradation, water resources and ecosystem services in the oases if these activities are not implemented correctly. Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of High/substantial Risk Projects.

It's also noted that the Project is being developed in a legal/regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, and where the legislation or regulations do not adequately address the risks and impacts in these areas. However, the borrower has some experience in developing and implementing such type of project in a pilot area of 6 oases. The borrower capacity and experience managing a larger area and activities could be readily addressed through implementation support. The Environmental and Social institutional arrangement proposed from the central to the local level will be able to ensure environmental and social compliance during the project implementation.

Social Risk Rating

Moderate

Project social risks are deemed moderate. The rationale of this classification is as follows. The Project Development Objective (PDO) is to promote integrated development of oasis ecosystems in four governorates in Tunisia. Potential social risks and impacts related to the project may include, but not be limited to: land acquisition; poor management of labor in project units and among contractors, social exclusion of groups which are economically or socially vulnerable; restrictions in access to resources through the establishing management plans and control measures; and poor management of grievances and expectations. These risks will be oasis specific. Project activities will be confined within the boundaries of the oasis and will: a) employ the procurement of local contractors for civil works, there is a potential for a limited labor influx according to the RPF ; b) employ stakeholder engagement as the central mechanism for sub-project identification, preparation, implementation, monitoring and evaluation; and c) establish grievance redress mechanisms to strengthen project ownership and prevent potential conflicts between beneficiaries. Land acquisition is highly unlikely inducing involuntary resettlement is highly unlikely; only temporary land acquisition for civil works is expected. Likewise, restrictions in access to resources through the establishing management plans and control measures, both that oasis have time-honored management plans and control measures based on traditional consultations and equal access to resources, and any planning of such activities will be subject to community consultations and decision making, to avoid restrictions to access. This assessment is based on information assembled from the Concept Note (CN), the RPF, the PAD and the OASIS pilot project implementation reports, including aide memoirs and the midterm review reports.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The main Environmental risks/impacts identified are linked to component 2 through its all 3 sub-components. Indeed, any activity to be funded under this component, even if they have positive impacts, may cause negative indirect and cumulative impacts on the fragile ecosystem of the oasis, especially the traditional ones, characterized by an increasing anthropic pressure with latent urbanization, water resources scarcity, degradation of soils threatened mainly by salinization and gradual disappearance of the three layers of vegetation, key element of biodiversity of flora and fauna. Any building/rehabilitating physical investment/infrastructure in or nearby oases may generate additional wastes and increase land speculation. Implementing new cultivations modes may threaten the natural

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ecosystem and local biodiversity if we introduce invasive species, pests or overuse of pesticides . Development of ecotourism may increase the number of people circulating in the oases thereby increasing the risk of degradation and disturbance to fauna and flora and accidental outbreaks of fires. Use of renewable energy for water pumping may increase the pressure on water resources and worsen the problem of soil salinization. Some other risks/impacts are also linked to ecosystem services and the use of living natural resources. Indeed, the oases are provisioning food, fresh water to local populations, protect the areas against natural hazards as the advance of the desert, and are area of importance for recreations and aesthetic enjoyment. Social risks and impacts related to the project may include, but not be limited to: land acquisition; social exclusion; poor management of labor in project units and for contractors and poor management of grievances and expectations.

Oasis are the generic project locations, but as project specific sites within the oasis are yet to be identified an ESMF and an RPF have been prepared. All subprojects screened as High risks will not be funded. The ESMF has also developed provisions to ensure that labor aspects, including child labor and labor influx, are properly addressed in during project implementation.

A water balance analysis has been prepared and covered the geographic areas of the oasis in the governorates of Kebili, Tozeur, Gafsa and Gabes.

A cumulative impact assessment (CIA) on Biodiversity and Ecosystem Services will be carried out during project implementation. The TORs for this CIA is part of the ESMF. The findings and outcomes of the cumulative impact assessment will guide the project implementation.

The ESMF incorporate all available baseline data from Tunisian Oasis Monography prepared as part of the former pilot oasis project. The ESMF propose indicators related to cumulative impacts on Biodiversity and Ecosystem Services as part of the monitoring and evaluation system of the project. These indicators could be linked to; number of species introduced by project activities, Volume of water consumed by project activities, Quality of soils in project activities areas, Number of persons visiting the oasis areas after introducing new project activities, surface areas gained from desert advance etc...

The RPF screens out potential land acquisition inducing involuntary resettlement and land restrictions, and provides guidelines for the preparation of a resettlement plan (RAP).

The ESMF and the RPF will be part of the Project Operations Manual (OM), which will be prepared at appraisal. ESMF and RPF were disclosed in borrower and WB websites on October 11th 2019.

Other potential social risks and impacts related to project investments may include, but not be limited to: social exclusion; poor management of labor in project units and for contractors, exclusion of groups which are economically or socially vulnerable; and poor management of grievances and expectations. The client has prepared a Stakeholder Engagement Plan (SEP) prior to Appraisal. The SEP includes both other interested parties (OIPs), various beneficiaries and directly impacted project affected persons (PAPs).

ESS10 Stakeholder Engagement and Information Disclosure



The client has prepared a stakeholder engagement plan (SEP), prior to appraisal. The SEP includes both other interested parties (OIPs), various beneficiaries and directly impacted project affected persons (PAPs), including disadvantaged and vulnerable groups. Primary stakeholders include: Ministry of Local Affairs and Environment (MALE), individual farmers at oasis and oasis farmers' associations. Additional stakeholders are: the inhabitants of the oasis; farm produce traders; labor representation and unions; representation of enterprises and employees; other CSOs involved in oasis affairs; NGOs, and directly impacted project affected persons (PAPs) including disadvantaged and vulnerable groups. The PMU will prepare a Stakeholder Engagement Plan (SEP) prior to Appraisal consistent with the requirements of ESS10. The draft SEP was subject to a meaningful stakeholder consultation and inputs before it's finalized for appraisal. The PMU will put in place, as part of the ESMF, procedures for external communications on environmental and social matters proportionate to the risks and impacts of project activities consistent with the requirements of ESS10. The ESMF include a project-level grievance mechanism to respond to public enquiries and concerns.

SEP was disclosed in borrower and WB website on October 11th 2019.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Environmental and social risks/impacts related to OHS are expected to be low, for the following reasons. First, as in the pilot project, civil works are expected to be minor. Second, a key purpose of the project is to enhance the environmental management of oasis resources and reduce social insecurity. Further, the project will build on participatory planning and implementation of project activities, in line with the stakeholder engagement plan. Risks related to OHS could be induced by minor civil works. OHS measures will address, identification of potential hazards to workers, provision of preventive and protective measures, training of project workers and maintenance of training records, documentation and reporting of occupational accidents, diseases and incidents, emergency prevention and remedies for injuries, disability and disease.

Direct workers in the project management unit (PMU) will be civil servants, consultants, the others will be contractors and community workforce on voluntary basis. The PMU of the Ministry of Local Affairs and Environment (MALE), prepared a labor management procedure and contractors will prepare labor management plans. These procedures will set out the way project workers will be managed in accordance with the requirements of national laws and ESS2. The procedures will include requirements for: working conditions and terms of employment; nondiscrimination and equal opportunity; worker's organizations; child labor and minimum age; forced labor; grievance mechanisms and occupational health and safety with other specific provisions concerning community workers. The Labor management procedure indicated that 2500 to 3000 community workers on voluntary basis will be involved in the project.

The MALE will incorporate the requirements of ESS2 into contractual agreements with contractors together with appropriate noncompliance remedies. The ESMF identified related OHS risks/impacts and mitigation measures to be incorporated into labor management procedure as well as contractors labor management plans.

The LMP was disclosed in borrower and WB website on October 11th 2019

ESS3 Resource Efficiency and Pollution Prevention and Management



The project will promote the sustainable use of energy through development of new sources of renewable energy (PV, solar pumping). Other sub activities as implementation of new cultivation modes, , development of ecotourism or new value chains may create potential Risks/impacts on water resources in the area.

A water balance analysis has been prepared. Main Results of the study confirmed the scarcity and the fragility of water resources in the oases areas. The project will implement the recommendation of the study. The water balance Analysis was disclosed on borrower and WB website on October 11th 2019

The ESMF integrated findings of water balance analysis and has screened out subprojects with substantial/high risk/impacts on oasis water resources. During construction phase, the activities may also present Risks/Impacts linked to generation of wastes including hazardous wastes, emission to air and noise and indirect use of pesticides even if the project is encouraging the bio certification process through its component 1. The ESMF assessed all these risks/impacts and mitigated them through ESMPs to be prepared during project implementation.

ESS4 Community Health and Safety

Communities health and safety issues are associated to typical risks/impacts of construction sites as vehicle traffic, dust, noise, vibrations, hazardous material, labor influx and specific hazards including structural and site access issues and accidental outbreaks of fires.

Subprojects will be mainly implemented in private properties, the project will not retains security forces to safeguard its personnel and property.

The ESMF assessed key challenges related to risks/impacts, propose solutions to avoid if not possible mitigate them through ESIA/ESMPs that will be prepared during project implementation.

Other risks/impacts are linked to ecosystem services and the use of living natural resources as the oases are provisioning food, fresh water to local populations and protecting the area against natural hazards as the advance of the desert Oases are also areas of importance for recreations and aesthetic enjoyment.

A Cumulative Impact Assessment on ecosystem services will be conducted during the first year of the project implementation and will be updated during mid-term review. The findings and outcomes of the cumulative impact assessment will inform the project implementation.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Minor civil works and new or modified land management schemes may induce Land acquisition, reduced access rights, restrictions on land use and involuntary resettlement. Acquisition of land is, however, expected to be very limited in magnitude, as oasis are settlements with time-honored land title schemes that date many generations



back. It is very unlikely, that project activities will induce changes to such entrenched traditions. Physical displacement is not expected, but economic displacement cannot be excluded. The pilot Oasis project induced only temporary land acquisition for civil works. The same is expected for the current project. Quantity of land to be potentially temporarily affected, is estimated at less than half an hectare. The Resettlement Policy Framework has estimated for the entire project, the number of project affected households to 200-300 households, and the number project affected persons (PAPs), estimated at 1000 -1600 persons. In the unlikely situation of physical displacement or permanent land acquisition, the scale of involuntary resettlement or land acquisition will be permissible at any given oasis site at 12 households or less, subject to consultations and decision by the oasis communities.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Any activity to be funded will generate Risks/impacts on the fragile ecosystem of the oasis characterized by gradual disappearance of the three layers of vegetation, key element of biodiversity of flora and fauna. Physical investment/infrastructure, new innovative cultivation modes, use of new sources of renewable energy sources, development of ecotourism activities or creating new value chains may also cause quality degradation of soils already threatened by salinization . Even Oases ecosystems may be considered as Modified habitats where human activity has substantially modified an area’s primary ecological functions and species composition, these ecosystem can still be fragile with biodiversity values.

The ESMF assessed all these risks/impacts where significant risks and adverse impacts on biodiversity have been identified. The screened out all sub activities with Substantial/high impacts/risks on Biodiversity and proposed necessary measures to avoid/mitigate residual ones.

A Cumulative Impact Assessment on Biodiversity will be conducted during the first year of the project implementation and will be updated during mid-term review. The findings and outcomes of the cumulative impact assessment will inform/be integrated into project design.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There are no communities in the identified project areas that fulfill the Bank's definition of indigenous people, although popular culture may associate oasis with indigenous people. This ESS is not considered relevant to the Project.

ESS8 Cultural Heritage

The ESMF prepared by the borrower has already provided “Chance finds” procedures. These provisions will be systematically incorporated in the budding documents for all activities that will need digging. Through the cultural heritage assessment, the PMU, will deeply assess the potential risks and impacts of the project in the its targeted sites. If deemed appropriate, the PMU will prepare a Cultural Heritage Management Plan. The plan should include relevant mitigation measures including among other : relocating or modifying the physical footprint of the sub project; conservation and rehabilitation in situ; relocation of cultural heritage; documentation; strengthening the capacity of national and subnational institutions responsible for managing cultural heritage affected by the project;



establishment of a monitoring system to track the progress and efficacy of these activities; establishment of an implementation schedule and required budget for the identified mitigation measures; and cataloguing of finds. As part of the cultural heritage assessment, the MALE will carry out meaningful consultations by identifying, in accordance with ESS10, stakeholders that are relevant for the cultural heritage that is known to exist or is likely to be encountered during the project life cycle. Stakeholders will include, as relevant: (a) project affected parties, including individuals and communities within the country who use or have used the cultural heritage within living memory; and (b) other interested parties, which may include national or local regulatory authorities that are entrusted with the protection of cultural heritage and nongovernmental organizations and cultural heritage experts, including national and international cultural heritage organizations. All consultations will be documented in the environmental and social assessment and/or in Cultural Heritage Management Plan.

ESS9 Financial Intermediaries

This ESS is not expected to be relevant to this project. The project will not employ the services of financial intermediaries.

B.3 Other Relevant Project Risks

The Project is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, and where the legislation or regulations do not adequately address the risks and impacts in these areas

The general political economy of Tunisia is yet to be fully stabilized, after the revolution. Unemployment is still at 15 %. Tax increases on fuel or other sensitive commodities could trigger civil unrest, in a fragile environment. These are factors that could jeopardize project preparation and implementation schedule.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
: Establish an organizational structure with qualified staff to support management of E&S risks (at least appointment of one E&S focal point at the PMU level and one E&S focal point within each of the Regional Project Implementation Units (RPIUs) These focal points will be responsible of the day to day	12/2019

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implementation of ESMF and RF. Maintain as necessary throughout Project implementation.	
ENVIRONMENTAL AND SOCIAL ASSESSMENT: Implement the environmental and social Framework (ESMF) and the Resettlement Policy Framework (RPF) [Throughout project implementation]	10/2019
MANAGEMENT TOOLS AND INSTRUMENTS: Develop and implement ESMPs and RAPs, when relevant, in accordance with the ESMF and RPF. [Before any commencement of works]	07/2020
Develop and implement procedures for managing contractors and subcontractors. Include systematically Environmental and Social provisions in all bidding documents, with an obligation for each contractor to prepare C- ESMP Incorporate systematically the contractual obligation to prepare an Environmental Health and Safety (EHS) plan proportionate to the work scoping..	07/2020
Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations from national authorities throughout Project implementation .[Before any commencement of works or initiation of activities that require permits, consents and/or authorizations]	07/2020
CAPACITY BUILDING PLAN: Prepare and implement an E&S Capacity Building Plan (for MALE staff and other stakeholders) that shall include clear timeframe and budget for its implementation. [Prior to the commencement of works]	07/2020
REPORTING TO WB: Prepare and submit a separate Environmental and Social semiannual performance reports to the World Bank [Each February 15 and July 15]	07/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
SEP PREPARATION: Prepare, disclose a Stakeholder Engagement Plan (SEP) including arrangements for grievance mechanism.	10/2019
SEP IMPLEMENTATION: Implement the SEP. Throughout Project implementation	06/2020
Quarterly reports. Starting May 2020	07/2020
ESS 2 Labor and Working Conditions	
The PIU will Implement the labor management procedures (LMP) that was prepared during project preparation.	10/2019



The PIU will strengthen and implement systematically Occupational Health and Safety (OHS) measures in all project's sites.	
Contractors will prepare and implement proportionate sites specific and when relevant Labor Management plans. Prior to the commencement of works at any of the sites.	07/2020
EMERGENCY PREPAREDNESS AND RESPONSE: Ensure that emergency preparedness and response measures are incorporated in the OSH plans,, [Prior to the commencement of works at any of the sites]	07/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: The contractor will Develop and implement measures and actions in work ESMP/EHS plan to manage waste and hazardous materials. [Prior to the commencement of works at any of the sites]	07/2020
WATER RESOURCES MANAGEMENT: MALE will implement the recommendations of the water balance analysis [As per project effectiveness]	07/2020
ESS 4 Community Health and Safety	
Incorporate in the C-ESMPs/EHS plans remedies measures for Community Health and Safety including traffic and road safety, Labor influx risks, (GBV) (SEA) risks and risks related to the use of security personnel	07/2020
MALE will prepare a Cumulative Impact Assessment on Ecosystem services. [First year of project implementation and Mid-term review]	10/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Preparation of a Resettlement Policy Framework (RF) - By Appraisal. Preparation of potential resettlement action plan (RAP), after Board, but before commencement of civil works which include involuntary resettlement	10/2019
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
BIODIVERSITY RISKS AND IMPACTS: The contractor will Incorporate in the C-ESMP/EHS and implement remedies measures and actions for terrestrial habitat alteration and biodiversity protection..[Prior to the commencement of works]	07/2020
CUMULATIVE IMPACT ASSESSMENT: MALE will prepare a Cumulative Impact Assessment on Biodiversity. [First year of project implementation and Mid-term review]	08/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	

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Not relevant	
ESS 8 Cultural Heritage	
CHANCE FINDS: Incorporate Chance find management procedures into all contracts involving any works under the project. [Bidding document]	07/2020
CULTURAL HERITAGE MANAGEMENT PLAN: MALE will prepare a Cultural Heritage Management Plan First quarter of project implementation	11/2020
ESS 9 Financial Intermediaries	
Not Relevant	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

The Tunisian E&S framework is not being considered to be relied on in whole or in part.

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IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Implementing Agency(ies)

Implementing Agency: Ministry of Local Affairs and Environment - DGEQV

V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

Task Team Leader(s):	Taoufiq Bennouna
Practice Manager (ENR/Social)	Pia Peeters Cleared on 07-Nov-2019 at 14:25:30 EST
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 21-Mar-2019 at 19:22:28 EDT
Practice Manager	Lia Sieghart (PMGR) Concurred on 21-Mar-2019 at 19:50:59 EDT