

Jbel-Sendouq Khalladi
Wind Farm and 225kV Power Line Project
Tangier, Morocco

Non-Technical Summary

August 2015

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Definitions and Abbreviations

Abbreviation	Meaning	Definition
ACWA	ACWA Power	Part owner of the Khalladi Wind Farm Project.
BM	Build Margin	
BPP	Biodiversity protection Plan	
CDER	Centre de Développement des Energies Renouvelables au Maroc	
CIA	Cumulative Impact Assessment	
CNEIE	Comite National des Etudes d'Impact sur L'Environnement	
CTF	Clean Technology Fund	
EBRD	European Bank for Reconstruction and Development	
EF	Emission Factor	
EIE	Etude d'Impact Environmental	
EMS	Environmental Management System	
EPC	Engineering Procurement and Construction	Entity responsible for the detailed design and construction of the Windfarm. Will implement the requirements of the EIA and ESMMF and other environmental/Social Management – Monitoring plans.
EPs	Equator Principles	
ESAP	Environmental and Social Action Plan	
EIA	Environmental and Social Impact Assessment	
ESMMF	Environmental and Social Management and Monitoring Framework	
GHG	Green House Gas Emissions	
IFC	International Finance Corporation	
IFI	International Finance Institution	
LAP	Land Acquisition Plan	
MW	Mega Watt	

Abbreviation	Meaning	Definition
NTS	Non Technical Summary	
O&M	Operation and Management	Entity responsible for the operation and management of the project, implementation of the EIA, ESMMF and other environmental/Social Management – Monitoring plans. For this project, NOMAC a subsidiary management branches of ACWA Power will be the designated O&M.
OM	Operating Margin	
ONE	L'Office National de l'Electricité	
PPA	Power Purchase Agreement	20 year term
PL	Power Line	
PR	Performance requirement	
SEP	Stakeholder Engagement Plan	
SIA	Social Impact Assessment	
UPC	UPC Renewable	Part owner of the PPA project.
WF	Windfarm	
	ESIA Disclosure Package	In order to develop a best practice, integrated ESIA for the WF and PL, and in line with EBRD's PRs, the existing EIE and supporting environmental management reports needed to be updated to ensure that appropriate impact identification, mitigation and monitoring plans were developed following the E&S assessment of the WF and PL project. As such, in addition to the EIE, the following documents have been prepared for the disclosure package: <ul style="list-style-type: none"> • Project Description • Biodiversity Protection Plan (BPP) • Social Impact Assessment (SIA) • Stakeholder Engagement Plan (SEP) • Land Acquisition Review and Livelihood Restoration Framework (LARLRF) • Environmental and Social Management and Monitoring Plan (ESMMF) • Non Technical Summary (NTS) • Environmental and Social Action Plan (ESAP) • Flicker effect impact assessment • Noise impact assessment The EIE approved in 2012 will also be disclosed together with the documents listed above, as part of the disclosure package.
-	Project Owner	The Consortium of ACWA Power and UPC renewables.

Abbreviation	Meaning	Definition
-	Site access Road	New or upgraded roads that lead from existing arterials, though the villages to the entrance of the Wind farm.
-	Subcontractor	Construction and Operation subcontractors are contractually bound to implement the EIA, ESMMF and other environmental/Social management and monitoring plans has provided by the EPC/O&M.
-	120MW Khalladi Windfarm	The 40 turbines positioned along the ridge of the Jbel Sendoug, permanent access roads, underground cables and other support facilities, and the overhead Power Line extending from Meloussa to Tetouan.
-	Turbine tracks	Tracks are located on the ridge, and are the connecting paths between the turbine platforms.
-	Underground cable	This cable is located on the ridge, and runs parallel to the turbine track. The cable contains all of the electricity lines from each turbine and eventually runs underground to the substation in Meloussa. Again this cable will parallel the access road from the ridge at the wind farm to the substation. The easement required for the underground cable does not exceed 2 metres on either side of the cable.
5 Capitals	5 Capitals Environmental and Management Consulting	

1 INTRODUCTION

The Khalladi Windfarm Facility is a 120MW windfarm, which will be built in the region of Tangier along the ridge of the Jbel Sandouq, in the Kingdom of Morocco, under Law 1309 (private ownership).

The Project Developer, UPC prepared an *Etude d'Impact Environnemental (EIE)* (hereafter referred to as the Environmental Impact Assessment, EIA) of the Wind Farm (WF) in July 2011 and obtained the approval of the EIA by the Comité National des Etudes d'Impact sur L'Environnement (CNEIE) in July 2012. The validity of the approval covers a period of 5 years, in which time construction should have commenced.

In 2014, ACWA Power acquired a share in the Khalladi Wind Farm project and has since sought funding support from the European Bank for Reconstruction and Development (EBRD), an International Finance Institution (IFI).

In addition to the WF, L'Office National de l'Electricité et de l'Eau Potable (ONEE) had originally envisaged that the construction of the 225kV Power Line (PL) for the WF, would be undertaken under a separate contract. However, discussions with ACWA Power have led to the agreement that the PL would be constructed under the same EPC as the WF. As such, the environmental and social impacts from the construction and operation of the PL would need to be studied and relevant mitigation and management measures developed as part of the environmental and social documentation for the Wind Farm.

In order to develop a best practice, integrated ESIA for the WF and PL, and in line with EBRD's PRs, the existing EIE and supporting environmental management reports needed to be updated to ensure that appropriate impact identification, mitigation and monitoring plans were developed following the E&S assessment of the WF and PL project.

5 Capitals Environmental and Management¹ Consulting have prepared the following documents for the disclosure package:

1. Project Description
2. Biodiversity Protection Plan (BPP)
3. Social Impact Assessment (SIA)
4. Stakeholder Engagement Plan (SEP)
5. Land Acquisition Review and Livelihood Restoration Framework (LARLRF)
6. Environmental and Social Management and Monitoring Plan (ESMMF)

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7. Non Technical Summary (NTS)
8. Flicker effect impact assessment
9. Noise impact assessment
10. Environmental and Social Action Plan (ESAP)

The present document is the Non-Technical Summary, which provides an overview of the main elements of the WF and PL projects and summarises the main environmental impacts and recommended mitigation measures.

The above reports will be provided in French and Arabic. The NTS and ESAP will also be available in English

1.1 Regulatory Framework

The EIA and supplementary disclosure documents have been prepared in accordance with Moroccan Law No. 11-03 for the Protection and Improvement of the Environment and Law No. 12-03 for the Environmental Study Impact Process of Morocco.

Equally, the environmental and social requirements of the EBRD, have been taken into consideration for the preparation of the disclosure package. The EBRD's Environmental and Social Policy (May 2014) has been developed to ensure that funding is provided to environmentally sound and sustainable development projects. As such the Policy serves as a technical reference source to support the implementation of the EBRD's 10 Performance Requirements (PR), which are intended to prevent and mitigate undue harm to people and their environment in the development process. The 10 PRs provide guidelines for the identification, preparation, and implementation of programmes to offset or mitigate against any negative impacts resulting from the development of a projects.

2 PROJECT DESCRIPTION

The proposed Khalladi Windfarm project and 225kV Power Line project is located within the Tanger-Tetouan Region of Morocco. Specifically, the 120MW Windfarm will be built on the ridge of the Jbel Sendouq, which is located approximately 50Km east of Tangiers. The PL will run 24km in a south-easterly direction, starting from the middle western flank of the Jbel Sendouq and culminating at the Tetouan Substation, located approximately 10km west of Tetouan.

The WF is located within the Province of Fas Anjra and crosses through the Communes of Qsar Saghir, Meloussa and Khmis Anjra. The PL is located within the Provinces of Fas Anjra and Tetouan and crosses though the Communes of Sadina, Khmis Anjra, and Souk kdim.

Figure 2-1 General Project Location WF and PL



3 PROJECT BACKGROUND

3.1 Rationale of the Project

The government of Morocco's energy policy "*Programme National de Développement des Énergies Renouvelables et de l'Efficacité Énergétique*" has committed to producing approximately 10% of its power from wind resources. Of all the forms of renewable energy production, wind energy is considered one of the "cleanest", as it does not directly contribute to GHG emissions, does not use water, and does not require the use or storage of large volumes of hazardous chemicals on site. Furthermore, the long-term impacts from wind farms are minimal as these installations do not restrict the land use of the area where the wind farm is operating, nor do they permanently alter the topography of the area.

Aside from the environmental benefits of using renewable sources for energy production, the economic benefits include a decrease in reliance of foreign imported fuels, less exposure to the price fluctuation of convention fuels and the reduced risk of disruption of supply. Furthermore, with continued improvements in technology, the energy output of each turbine is increasing whilst the cost of materials and manufacturing is decreasing, thereby improving the cost benefits of such power stations.

3.2 Alternatives

Under Moroccan and international guidelines for environmental impact assessments, the evaluation of various project location and design alternatives were considered, in order to ensure that the objectives of the proposed project have accounted for social, ecological, economic and technological options.

The following project alternatives were considered:

No Project

The "No Project" option is not a viable alternative, as the objective of the renewable energy law is to diversify the sources and production measures of power for the Kingdom of Morocco.

Alternative project location

The *Centre de Développement des Énergies Renouvelables au Maroc* (CDER) identified several regions across the country that would enable the successful implementation of wind farm, and the Tanger-Tetouan region ranks highly amongst these.

Within this region, 4 sites were evaluated on the following factors, in order to identify the most suitable site:

- Ecological Condition
- Land Use
- Accessibility for construction and operation.
- Archaeology
- Visual and Noise impacts
- Wind resource

The assessment singled out the Jbel-Sendouq (Khalladi) site, as it provided the greatest (120MW) and most reliable source of wind, was easily and safely accessible, was not within or near to any areas of archaeological importance, the ridge is uninhabited and the impacts to ecology were reduced given the extensive alteration and loss of the natural habitats from long-term and continued resource extraction in the region.

Alternative layout and production technologies

The alignment, number of turbines, and type of turbines chosen for the proposed project was determined on the basis of total required power output, available technology, constructability on site, and wind strength and direction patterns.

As such, the design of the wind farm has optimised the alignment of the turbines against the direction of wind, and has optimised the number of turbines against the potential output of each turbine. The result is that the Windfarm will comprise of 40 turbines, with an individual output of 3MW, and will follow the alignment of the main ridge of Jbel Sendouq, with offshoots along three spurs located at the northern end of the Windfarm.

With regards to the Power line, UPC Renewables started looking into the preferred alignment for connecting the Meloussa Substation to the Tetouan Substation in 2010. The selection of the preferred alignment was based on a constraints analysis of social, engineering, maintenance and cost issues with relation to the evaluation of the following criteria:

- Voltage drop over distance
- Accessibility for construction and operation
- Suitability of terrain for facilitating the installation of the pylons and wires
- Availability of land for maintenance of a buffer zone
- Prudent avoidance of inhabited areas due to EMF

Once the general area of the Power line was identified, the refinement of the alignment focused on avoiding houses, structures or valuable land-uses and reaching voluntary agreements with all land owners. As such a local employee was hired to approach land owners and find out what would be the most suitable alignment. When a landowner

expressed his reluctance to reach an agreement, the alignment was modified to avoid his land.

UPC Renewables considered several alternatives in connection with the transmission line for the Khalladi 120 MW power project. These included both medium voltage and high voltage transmission line options. The medium voltage option had the advantage of requiring a simple upgrade to an existing 60 kV line running adjacent to the project site. Given the quantity of power being evacuated, this option was dismissed as being technically not feasible.

The final design of the 225kV PL resulted with an alignment of approximately 24km, with 75 pylons. The design and material selection of the pylons and wires will be in conformance to the technical specifications of the ONEE.

Finally it should be noted that micro-siting changes may still occur, and therefore the exact location of turbines, pylons, road alignments may vary slightly in accordance with Environmental and Social considerations raised during the stakeholder engagements and specialists ecological surveys.

4 SUMMARY OF ENVIRONMENTAL AND SOCIAL IMPACTS, MITIGATION AND MANAGEMENT MEASURES

The following subchapters comprise the "Supplementary Package" for Public Disclosure and summarise the baseline environmental and social condition and provides the overall impact evaluation of the construction and operation of the proposed project. The detailed mitigation measures recommended to minimise the impacts of these projects is provided in the following reports:

1. EIA July 2012
2. *Cahier des Charges Environnemental*, July 2012
3. Biodiversity Protection Plan (BPP)
4. Social Impact Assessment (SIA)
5. Stakeholder Engagement Plan (SEP)
6. Land Acquisition Review and Livelihood Restoration Framework (LARLRF)
7. Environmental and Social Management and Monitoring Plan (ESMMF)
8. Environmental and Social Action Plan (ESAP)

4.1 Ecological Environment

Of the seven habitats identified in the buffer areas of the WF and Power Line only Cork Oak woodland (9330 *Quercus suber* woodlands) is listed on Annex I of European Habitat Directive (92/43/ECC). According to EBRD Performance Requirement 6, the cork oak would be

considered as a Priority Biodiversity Feature; therefore any loss of cork oak woodland that cannot be avoided would require an offset strategy to achieve No Net Loss of this sensitive habitat. The area of Cork Oak woodland likely to be impacted by construction activities is just 0.25% of the area of Cork Oak woodland identified in the wider study area, corresponding to 0.07ha. The cork oak woodland in total is approximately 26.6ha and is fragmented over three locations in relation to the Wind Farm only.

Of the two hundred and eighty flora species observed in the buffer area of the WF, none are listed in Annex I of the Habitat Directive (92/43/ECC), and of those that would be found in the project footprints, none are listed above Least Concern on the IUCN Red list. However, a total of 24 species of Flora are considered as "Very Rare" in Morocco. Where they cannot be avoided, an offset strategy will be developed to achieve No Net Loss.

Of the twenty 26 species of reptiles and amphibians (herpetofauna) likely to occur in the buffer area of the WF, only one species the *Salamandria Algira*, is listed Vulnerable on the IUCN red list of threatened species, and has suitable habitat in the footprint of the WF project. However, the development of the proposed project is unlikely to result with any negative impacts to *Salamandria sp.* as measures to avoid direct harm of the reptiles have been recommended. These measures include the requirement to identify any hibernacula prior to the start of construction, to undertake a translocation program of any reptiles that may be impacted by the construction activities, and to construct hibernacula in suitable habitat within the project area, but outside the footprint of impact. Finally, monitoring of the reptiles will be carried out to ensure the success of the translocation program. The implementation of the mitigation strategy will be managed and undertaken by a professional environmental consultant and experienced ecologist, who will be contracted by the project developer.

Of all the birds observed in the buffer area, only the Egyptian Vulture is listed Endangered on the IUCN red list. According to BirdLife Morocco the phonological status of Egyptian Vulture is 'Passage Migrant', and is not breeding in the surrounding region of the proposed Khalladi Windfarm or the power line (source, Grepon-BirdLife Morocco).

Of the bats species likely to occur in the buffer area, four species are listed as Near Threatened on the IUCN Red List: Mediterranean Horseshoe Bat, Maghreb Mouse-eared Bat, Giant Noctule and Schreiber's Bent-winged Bat. However, none were observed during the surveys and suitable habitat, particularly for horseshoe bats in the footprint is marginal. The species that were actually observed in the footprint were all common.

The findings of the baseline studies for the WF, indicates that the site would NOT qualify as SPA (Natura 2000) even if it were located in Europe. Just two species within the buffer area

(9330 *Quercus suber* woodlands and *Miniopterus schreibersii*) were identified as Annex I and Annex II respectively under the Habitats Directive, during the surveys undertaken onsite. With this information we cannot consider the study area as a candidate for SAC qualification.

The summary baseline observations for the ecology of the Powerline, is that the majority of the land is significantly impacted by permanent and long-term agricultural activities. As such the habitat value for flora and fauna is low. Furthermore, no fauna, and flora of conservation concern were observed during the field surveys.

In conclusion, the proposed development location for the Khalladi Windfarm only (not the power line) is considered to have a Priority Biodiversity Feature according to EBRD Performance Requirement 6. An offset strategy has been proposed and this is described in Chapter 6 of the BPP.

With regards to the impacts from the construction and operation of the WF and PL, the main impacts, prior to implementation of the mitigation measure would be collision risks for avifauna, which ranks as major negative, prior to mitigation measures. The impact to the Cork Oak woodland ranks as moderate, given that the proportion of habitat that will be impacted is 0.25% of the total habitat found within the footprint of the WF project. The residual impacts for construction and operation, following the implementation of the recommended mitigation measures and monitoring activities, would be negligible for habitat, flora and fauna.

The residual impact for avifauna collision reduces to negligible following the implementation of the proposed mitigation measures, which include the implementation of a "shut down on demand" program for two turbines, particularly during peak migration for birds and reducing the blade speed to 3-5m/s between March and September for bats, if monitoring demonstrates significant mortality. Furthermore, with the additional implementation of construction and operation monitoring and targeted remediation measures recommended by an offset monitoring programme, these impacts can be further reduced in order to achieve No Net Loss.

4.2 Social and Economic Environment

The proposed WF and PL project will cross into a combined total of five communes and seventeen Douars as shown in the tables below. The combined population for these Douars is approximately 12,000, although some Douars have as little as 168 (Brareq), whilst the largest Douar has 1,200 (Bounzel).

Table 4-1 Douars of the Khalladi Windfarm

Province	Commune	Douar (Population)
Fahs Anjra	Meloussa	Ghzielech
		Aïn Hamra
		Lanjriech/Msiaad
		Brarek/Oqal
	Qsar Sghir	Aïn Rmel
		Dhar Foual
	Khmis Anjra	Fahamine
		Mlalah

Table 4-2 Douars of the Power Line

Province	Commune	Douar
Fahs Anjra	Khmis Anjra	Fahamine
		mlalah
		Dar Kachana
		Zaouia
		Bni Atab
		Boulaichich
Tetouan	Sadina	Ouad Akla
		Keddane
		Jaabak
		Sadina
	Souk Kdim	Bounzal

With regards to the WF project, the development will be on the ridge of the Jbel Sendouq, the land use of the ridge is grazing and the land status is communal. Therefore, the land on the ridge is accessible to any resident of the neighbouring Douars.

The Power line will pass through communal, Habous and private land. The land uses in the area are all agricultural, with the communal and Habous lands essentially used for grazing, whilst the private lands are cultivated.

Given the predominant land use of the Douars, the principal source of employment activity is agricultural, with many of the residents earning a second source of income from worker or commercial activities.

There are no ethnic minorities, indigenous peoples or internally displaced people in the project area. The social survey undertaken in the affected communities included 125 surveyed households and showed that most of them (110 out of 125) meet one or more of

the vulnerability criteria outlined below. Vulnerability levels are high in the project area when compared to the average values in rural Morocco. Two key causes of this high vulnerability are the type of agricultural activities undertaken in the project area (cereal and vegetable planting and extensive grazing, with traditional farming methods, low value added and access only to local markets) and the difficulty in accessing services (with secondary education and doctors only being available at the capital of the communes).

Vulnerable people are those who due to any specific characteristic, such as gender, age, ethnicity, disabilities, economic situation or social status, may be more adversely affected by the land acquisition process or have a more limited ability to take advantage of compensation or livelihood restoration measures than others. In the context of the project, we can identify the following vulnerable groups:

- Women, as in rural morocco have traditionally been and still tend to be less involved in public affairs and have less access to financial resources and the judiciary system than men. Women headed households are particularly vulnerable;
- The illiterate, as they have difficulties accessing information and participation mechanisms;
- Disabled people, seriously ill people or the elderly, particularly when living alone;
- Households that have very limited resources, below the poverty line as per the relative poverty threshold;

Stakeholder consultation was undertaken in 2012 and again in 2015 to discuss the likely impacts of the project with the affected communities and therefore to develop targeted mitigation measures and livelihood restoration measures to offset these impacts.

The details of the stakeholder consultation and the recommended mitigation measures and management plans are given in the Social Impact Assessment (SIA) report, Stakeholder Engagement Plan (SEP) and Land Acquisition Review and Livelihood Restoration Framework (LARLRF).

The results of the social impact assessment, found that negative impacts to the Douar communities would be negligible, and in fact mostly positive impacts would come about from the implementation of the recommended mitigation measures and social programs recommended in the mentioned reports.

Finally, continued engagement with the Douar populations will be undertaken through the implementation of the SEP during the lifecycle of the project. As such, any grievances that may arise during the construction and operation phase of the project will be remediated.

4.3 Environmental and Social Management Plan

The requirements for the Environmental and Social Management and Monitoring Plan for construction and operation are presented in the *Cahier des Charges Environmental* July 2012, and the supplementary ESMMF, which has been prepared for the disclosure documents. The ESMMF serves as a basis for the preparation of comprehensive management plans in order to avoid, prevent, reduce or rectify environmental and social impacts that may arise during both construction and operation of the WF and PL.

Issues covered within the ESMMF include: environmental and social management staff roles and responsibilities, environmental and social requirements and compliance, environmental training and social awareness programmes, and monitoring, recording, inspection and auditing protocol.

The following actions will be implemented to ensure management and monitoring of the WF and PL during construction and operational phases is in accordance with international best practices:

1. Prepare a detailed Construction Environmental and Social Management Plan and ensure that a full-time Environmental/Social Co-ordinator is appointed to manage and oversee day - day environmental/Social management/monitoring activities, training and reporting.
2. Independent environmental audits will be undertaken quarterly to monitor compliance with MEMEE standards and this information reported to the lenders and regulators.
3. Prior to WF operations commencing, an EMS consistent with ISO 14001 will be developed and implemented by the Operations & Maintenance Company. This will be subject to external auditing in the future.

The EPC contractor is required to have an Environmental, Health and Safety Management system independently certified to ISO14001 and OHSAS 18001 respectively.

The EPC contract requires the EPC contractor to develop and implement a project specific HSE management plan to ensure compliance with good utility and international practices and standards, which includes worker accommodation and labour standards. The EBRD Performance Requirement 2 further covers these issues. During the operation phase, the Project Owner is held to the same standards.

ONEE and the EBRD, will receive, review and comment on the routine monitoring reports supplied by the EPC and Operator.

Finally, an Environmental and Social Action Plan (ESAP) has been prepared that includes various measures to be implemented by the Project Company to ensure that the project is developed and operated in accordance with GIP. These include but are not limited to the development and implementation of an Environmental and Social Management System (ESMS), a Human Resource Policy, the finalisation of Land Acquisition and Livelihood Restoration Plan (LALRP), implementation and continued updating of the Stakeholder Engagement Plan (SEP), implementation of the grievance mechanisms, and implementation of the Biodiversity Protection Plan (BPP).

5 COMMUNICATIONS

5.1 Public Consultation and Disclosure

The EIA and supporting documents are available for public review on the website of the EBRD and project proponent, as indicated in the subchapter 5-3. In addition, a Stakeholder Engagement Plan (SEP) has been developed by ACWA Power and is available on the company website. The purpose of the SEP is to provide up to date information regarding the project activities, phases and status to concerned and interested parties.

The SEP outlines the strategies that the project proponent is implementing to mitigate and manage the environmental and social impacts of the projects, and the mechanisms that the proponent and stakeholder can use for establishing contact and exchanging such information. As such the SEP includes a Grievance Mechanism, which the stakeholder may use to communicate any problems or complaints to the Project Company.

5.2 Grievance Mechanism

The Project Company has developed a grievance procedure, which aims to receive and facilitate resolution of the stakeholder's concerns and grievances about the Project's environmental and social performance. It seeks to resolve concerns promptly, using a transparent process that is culturally appropriate and readily accessible at no cost and without retribution to the party that originated the issue or concern. The mechanism covers any type of complaint whatever the subject and nature, and will include the following steps:

- 1) Submission and registration of the complaint (by post, online, at the project gate, during Community Liaison Officers visits to the affected Douars)
- 2) Confirmation of receipt with identification of resolution strategy
- 3) Follow up with complainant for agreed resolution and projected timeline for implementation
- 4) Update of the grievance log and management plans

This mechanism is discussed in more detail in the Stakeholder Engagement Plan for this project.

The below contact information may be used to review the EIA, supporting documents, and for lodging a grievance.

5.3 Contacts and Information

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