



CPG Modernisation Project, Tunisia

Stakeholder Engagement Framework

EBRD

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Prepared by:

SLR Consulting France SAS

2 Square Roger Genin, Grenoble, 38000

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SLR Consulting France SAS
2 Square Roger Genin, 38000 Grenoble, France
T: +33 6 23 37 14 14
www.slrconsulting.com



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Acronyms

Acronym	Full text
ANPE	Agence Nationale de Protection de l'Environnement (National Agency for Environmental Protection)
CLO	Chief Liaison Officer
CPG	Compagnie des Phosphates de Gafsa
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessments
ESIA	Environmental and Social Impact Assessments
FPIC	Free, Prior, and Informed Consent
GBVH	Gender-based violence and harassment
GRM	Grievance Redress Mechanism
KPI	Key performance indicators
MIME	Ministry of Industry, Mines and Energy
NGO	Non-Governmental Organisation
ONM	Office National des Mines (National Offices of Mines)
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SEF	Stakeholder Engagement Framework



1 Introduction

1.1 Background

This Stakeholder Engagement Framework (SEF) has been developed for the Modernisation Project (hereafter, the Project) to be implemented by the Compagnie des Phosphates de Gafsa (CPG) under financing from the European Bank for Reconstruction and Development (EBRD). The Project will involve the partial replacement of the existing mobile mining fleet and the installation of filter presses, including associated tailings dams, at a selection of sites belonging to CPG.

The number of filter presses to be installed, including associated tailings dams, and the specific locations of the Modernisation Project have not yet been determined. Consequently, it is not yet possible to develop a Stakeholder Engagement Plan (SEP), as stakeholders cannot be identified.

Once the location and final requirements of the Project are defined, a SEP will be developed to cover all of CPG's operations. This SEP will be prepared according to the approach outlined in this document. As such, this SEF's objective is to set out the overarching principles that will guide CPG's commitments to transparent and inclusive engagement in line with EBRD 2019 Performance Requirement (PR) 10.

1.2 Contents of the SEF

The SEF sets out the overarching principles that will guide CPG's approach to stakeholder engagement and grievance management.

It includes:

- A review of national legislative requirements as well as EBRD performance requirements for stakeholder engagement (see Section 2).
- Guiding principles for the identification of affected and interested stakeholders, including vulnerable groups (see Section 3).
- A provisional Stakeholder Engagement Programme (see Section 4).
- A Community Grievance Redress Mechanism (see Section 5).
- Roles and responsibilities required for the implementation of the SEF (see Section 6).
- A system to monitor the implementation of the SEF (see Section 7).

2 Legislative Requirements

2.1 National Legislative Requirements

Stakeholder engagement in Tunisia is formally recognised in legislation as a component of democratic governance and public participation.

The 2014 Constitution recognises the right to information in Article 32 and to democratic participation at local levels in Article 139. Additionally, Organic Law No. 2016-22 (24 March 2016) and Government Decree No. 2018-328 (29 March 2018) guarantee access to public information and enable public participation in policymaking, while Decree-Law No. 2011-41 (26 May 2011) grants the right to access administrative documents from public institutions. Finally, it establishes procedures for public consultations and participation for the development of policies, strategies and reforms.

In terms of engagement in the context of development projects or infrastructure, Decree No. 2005-1991 of 11 July 2005, establishing the procedures for conducting Environmental Impact Assessments (EIA), defines the requirement for engagement of Project-affected stakeholders



via EIA disclosure at municipal offices for a fixed period. However, the decree does not require any in-person engagement or more comprehensive disclosure via a public hearing. Additionally, the Mining Code does not explicitly require stakeholder engagement or public disclosure of EIAs.

Consequently, national stakeholder engagement practices are not fully aligned with EBRD requirements (see Section 2.2).

2.2 EBRD Performance Standards

The EBRD outlines requirements for stakeholder engagement primarily under ESR 10: Information Disclosure and Stakeholder Engagement.

This ESR applies to all projects financed by the EBRD and sets the framework for engaging with affected communities and other relevant stakeholders in a transparent and inclusive manner.

Key principles of ESR 10 include:

- **Early Engagement:** Stakeholder engagement must begin at the earliest stage of project development and continue throughout the project lifecycle.
- **Disclosure of Information:** Project-related information must be disclosed in a timely, accessible, and culturally appropriate manner.
- **Meaningful Consultation:** Engagement must be free of manipulation, interference, coercion, or intimidation, and must be inclusive of vulnerable and disadvantaged groups.
- **Grievance Mechanism:** Projects must establish and maintain a grievance mechanism to receive and address concerns from project-affected stakeholders.
- **Stakeholder Engagement Plan:** A tailored plan must be developed, proportionate to the project's risks and impacts. It outlines the approach to information disclosure, consultation activities, and ongoing engagement strategies.
- **Free, Prior, and Informed Consent (FPIC):** In cases where Indigenous Peoples are affected, EBRD may require FPIC, in line with ESR 7.

3 Identification of Stakeholders

3.1 Mapping of Affected and Interested Stakeholders

The SEP will provide a detailed analysis of all affected and interested stakeholders. This includes all parties that CPG commits to engage across its operations.

The following categories of stakeholders should be included in the analysis:

- **Affected Stakeholders** – individuals, groups, or organisations who are directly and adversely impacted or have the potential to be impacted by the Project's activities, either economically, socially, or environmentally. They should include:
 - Any communities affected by land access restrictions, loss of income or loss of land and natural resources as a result of developing the different components of the Modernisation Project.¹
 - Any communities affected by health and safety impacts of CPG's operations. This will include all communities where traffic, noise and pollution impacts from all of CPG's operations may be felt.

¹ It is assumed that the Project will not require to physically or economically displace people. Should any households be displaced, adequate engagement measures will be planned as part of the Stakeholder Engagement Programme.



- Any communities that may benefit from the Project via the creation of employment opportunities and the provision of development projects or Corporate Social Responsibility (CSR) initiatives.
- Any ethnic minorities or vulnerable groups amongst affected communities will be identified according to the guidance provided in Section 3.2.
- **Interested Stakeholders** – individuals, groups, or organisations who may not be directly impacted by the Project, but who have an interest in its outcomes or can influence its development. They include:
 - Relevant Government Agencies (e.g. regional representatives of ministries and departments responsible for mining, environment, labour, or social affairs) – this will include at least the Ministry of Industry, Mines and Energy (MIME), the National Offices of Mines (ONM) and National Agency for Environmental Protection (ANPE), as well as any other regulatory body that may be engaged by CPG.
 - Local authorities and representatives, including Gafsa’s governor and community liaison officers (CLOs) and elected municipal authorities (*élus*) within the sectors where CPG operates.
 - Non-Governmental Organisations (NGOs) and Civil Society Organisations (CSOs) operating in the Gafsa region. A wide range of NGOs and CSOs should be identified to cover a broad range of themes, including regional socio-economic development, social welfare and the rights of women or discriminated minorities.
 - Internal stakeholders, including CPG’s employees, management, and trade unions.

3.2 Identification of Vulnerable Stakeholders

The SEP will identify categories of people or groups that are expected to be more vulnerable than most community members, potentially requiring special arrangements to ensure meaningful consultation.

The SEP will identify vulnerable groups and for each justify the reasons for their vulnerability. Vulnerable people may:

- Be more sensitive to or disproportionately affected by negative Project impacts. This category will include at least:
 - Older or sick people that may be more sensitive to noise and air emission impacts.
 - Any household physically or economically displaced with a low-income or no income due to the household head’s age, gender or health status.²
- Have reduced access to Project benefits or face greater barriers in taking advantage of them, due to factors such as social marginalisation, health status, ethnicity or gender.
- Be more likely to be excluded from or unable to fully participate in stakeholder engagement processes. This category may include:
 - People with physical impairments who may struggle to attend public hearings or consultations.
 - People with mental disabilities who may struggle to understand Project information or engage meaningfully with the Project or may face challenges accessing grievance mechanisms.
 - Illiterate people who may struggle to understand written information about the Project or may face challenges accessing grievance mechanisms.

² It is assumed that the project will not result in the physical or economic displacement of any household. In the event of displacement, appropriate engagement measures aligned with ESR 5 will be provided for within the stakeholder engagement program.



- Women, who may have caring responsibilities at home and may struggle to attend public hearings or consultations.
- Any social or ethnic group that may be socially excluded or discriminated against.

Specific support measures will be defined to ensure that each vulnerable category is appropriately included in the stakeholder engagement activities listed in Section 4. This may include measures such as:

- Provision of transport to allow physically impaired people to attend public meetings.
- Allowing children into public meetings to encourage women's attendance.
- Provision of one-on-one support with identified illiterate people or people with mental disabilities to help them understand information and access the grievance mechanism.
- One-on-one ad-hoc sessions with any social group that may have been identified as socially excluded or discriminated against.

4 Stakeholder Engagement Programme

Table 4-1 below presents a framework programme intended to guide CPG in the development of a full Stakeholder Engagement Plan (SEP). It outlines key engagement activities with different stakeholder groups across the project lifecycle. The plan is intended to be flexible and scalable, to be refined and adapted by CPG as the project advances and as further information becomes available.

To ensure alignment with existing local practices and established relationships with stakeholders, an initial introductory meeting will be held with relevant local and regional authorities to present the objectives of stakeholder engagement, agree on roles and expectations, refine the programme outlined below and discuss coordination of grievance redress mechanisms.

The stakeholder engagement activities listed below are aimed at: (i) disseminating Project information and (ii) building and maintaining trust between the Project and stakeholders, including local communities. They will be implemented by two CLOs and the Social Manager where needed (see Section 6).

Once the specific categories of vulnerable people have been identified (see section 3.2), specific measures to ensure inclusive engagements should be included in the SEP.

The following actions are recommended:

- Mix the use of visual, oral and simplified communication tools during all community engagement activities.
- Provide a transport service for people with physical impairments to join community engagement activities.
- Arrange for meetings to take place outside of working hours to allow as many people as possible to join.
- Provide dedicated one-on-one support and explanation to people who may need additional support during community engagement activities, including assistance navigating the grievance redress mechanisms.
- Allow the presence of children during meetings.



Table 4-1 – Stakeholder Engagement Framework Programme

Engagement Category	Engagement Activity	Purpose	Targeted Stakeholders	Responsible Party	Channel	Timing
Planning	Scoping meeting with local/ regional government	Align on SEP objectives, roles, engagement methods, grievance coordination	Regional and local authorities listed in section 3.1	Social Manager + any other relevant member of CPG's management (e.g. HSE Manager)	Formal meeting	Before SEP finalisation
Sensitisation and capacity building	Training of Community Liaison Officers (CLOs) on SEP implementation and Grievance Redress Mechanism	Ensure CLOs are equipped to deliver effective community engagement and manage grievances appropriately Including specialised training on handling of gender-based violence and harassment (GBVH) grievances for the female CLO	CLO(s)	Social Manager	Internal training session	Before deployment of the SEP and yearly refresher
	Community awareness-building on SEP and grievance mechanism	Build community awareness and understanding of stakeholder engagement objectives, rights, and how to access and use the grievance redress mechanism	Community members and local representatives	CLO(s)	Public meeting	Before deployment of the SEP and yearly refresher
	Community training on GBVH awareness and grievance reporting	Raise awareness on GBVH, available reporting channels, and survivor-centered support options	Women and girls in project-affected communities	Female CLO with facilitation by a qualified NGO or CSO	Women-only session (no photos or attendance register for confidentiality)	Before deployment of the SEP and yearly refresher
Disclosure (Modernisation Project only)	Disclosure of NTS	Enable community understanding and feedback on the project	All stakeholders listed in section 3.1	CLO(s)	Meeting and online disclosure via CPG and EBRD websites	After Project approval
	Disclosure of E&S Assessment of the Modernisation Project	Disclose project scope, planned activities (fleet, filter presses, tailings dam), and timeline	All stakeholders listed in section 3.1	CLO(s)	Meeting and online disclosure via CPG and EBRD websites	Before implementation of the project
Regular engagement (All of CPG's operations)	Quarterly information meetings	Project information and updates, discussion on community impacts and grievances	Community members and local representatives listed in section 3.1	CLO(s)	Open public meeting moderated by local representatives	Quarterly
	Bi-annually information meetings	Project information and updates, discussion on project impacts and grievances	Regional and local authorities listed in section 3.1	CLO(s)	Meeting	Bi-annually



Engagement Category	Engagement Activity	Purpose	Targeted Stakeholders	Responsible Party	Channel	Timing
	Annual presentation of CPG's E&S performance	Presentation of overall performance including SEP implementation	Community members and local representatives listed in section 3.1	CLO(s) + Social Manager	Open public meeting moderated by local representatives	Annually
	Thematic workshops	Deep dives on specific issues or CSR initiatives	NGOs/CSOs	CLO(s) + any other staff in charge of the topic or initiative to be discussed	Workshop / roundtable	As required
	Monthly grievance meeting with the local chief (caïd)	Address and follow up on complaints or issues raised	Community liaison officer as local focal point for grievance management (see Section 5)	CLO(s) + Social Manager as needed	Individual or small group meetings	As required
Targeted engagements	One-to-one engagement with vulnerable stakeholders (if applicable)	Ensure meaningful engagement of people facing barriers to participation (such as social minorities or discriminated groups)	Vulnerable groups identified in Section 3.2 requiring separate engagement	CLO(s)	Meeting	As required
	Targeted engagement with potentially displaced people (if applicable)	Inform, consult and support households on potential resettlement impacts and entitlements	Any physically/ economically displaced households (and especially vulnerable households among them)	CLO(s) + Social Manager as needed	Monthly one-on-one or household-level meetings	Monthly from the resettlement census to the payment of compensation



5 Grievance Redress Mechanism

The Project's Grievance Redress Mechanism (GRM) is designed to provide a clear, accessible, and timely process for individuals and communities to raise concerns or complaints related to the project. It aims to resolve grievances fairly and transparently, in a way that complements existing legal options without restricting access to courts.

The GRM also includes provisions to ensure the safe, confidential, and survivor-centered handling of any gender-based violence and harassment (GBVH) incidents perpetrated by CPG staff against community members. GBVH complaints will be treated with enhanced confidentiality, and referrals will be made to qualified service providers and support organisations where appropriate.

The CLO(s) will be responsible for the implementation of the GRM and will be trained on it as defined in Table 4-1. At least one CLO will be female and trained in GBVH response to ensure that women raising grievances related to GBVH have the option to engage with a same-gender contact point. The female CLO will be trained specifically on GBVH and on the process required to handle these cases.

The GRM suggested in this SEF is only provisional. It will be modified as appropriate during the planning workshop with local authorities (see Table 4-1) to best align with CPG's resources and existing practices.

The structure of the GRM is presented below in Figure 5-1 below.

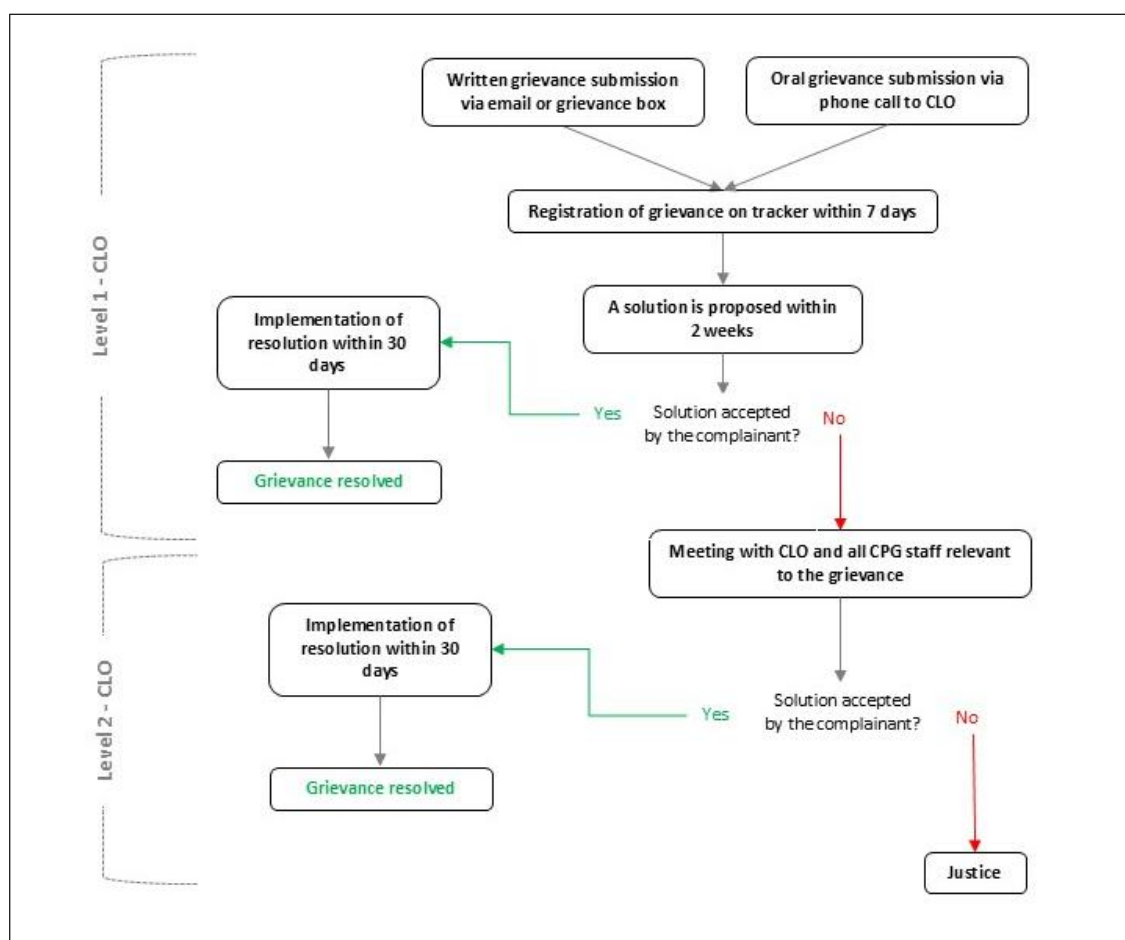


Figure 5-1 - GRM Flowchart



5.1 Reception and Registering of Complaints

A grievance is defined as an issue, concern, problem or claim – perceived or actual – that an individual or community wants CPG to address and resolve.

Aggrieved persons may submit a grievance through the following channels:

- Written submission via completion of the grievance form in Annex 2, which can be downloaded from the CPG website or obtained at local representatives' office. The form can be emailed directly to the CLO(s) or deposited in one of the grievance boxes located in local administrative offices.
- Oral submission via phoning the CLO(s) and reporting the grievance verbally.

All grievances, regardless of submission method, must be acknowledged within 7 days of receipt. Grievance boxes will be opened and checked at least once per week to ensure timely processing. Every received grievance will be registered in the tracker in Annex 1.

All grievances including incidents related to GBVH will be stored anonymously on the register.

5.2 Proposition and Resolution

Once a grievance has been registered, the CLO will call or meet with the complainant within 2 weeks to propose a solution. If the solution is agreed upon, a person or team will be mobilised to implement the resolution within a maximum of 30 days from submission of the grievance.

Should the issue not be resolved, or should the complainant be dissatisfied with the resolution, the aggrieved person may submit their grievance to Court where a decision will be made in accordance with relevant national legislation.³

For GBVH grievances, survivors will be approached in confidence by the female CLO. Where appropriate, the CLO will immediately refer the survivor to a qualified local service provider (e.g. NGO or CSO) for specialized, survivor-centered support, including legal, psychological, and medical assistance. No personal or identifying information will be documented in meeting records or shared without the survivor's informed consent. If the survivor consents, CPG's Human Resources Department will be informed to initiate disciplinary action against the perpetrator. The female CLO will maintain coordination with the support provider to ensure the survivor has access to necessary assistance. The grievance will only be considered closed once the survivor confirms that their support needs have been addressed to their satisfaction, or chooses to close the case.

6 Roles and Responsibilities

At a strategic level, the overall responsibility for the implementation of the SEP will rest with the Social Manager, who will oversee its delivery, monitor its effectiveness, and lead the annual review and update of the SEP to ensure alignment with ESR 10 and evolving operational priorities.

The day-to-day implementation of the SEP will be carried out by two CLOs, who will be responsible for engaging with all communities identified in Section 2.1 as potentially affected or interested in CPG's operations. At least one of the CLOs will be a woman, to support the sensitive handling of GBVH grievances and facilitate meaningful engagement with women and vulnerable groups.

³ It should be noted that affected people can approach the court of law at any other time during the grievance redress process, should they wish to do so.



Alternatively, CPG may delegate SEP implementation to a qualified CSO or NGO with proven experience in community engagement and GBVH-related work. In such a case, the selected organisation will receive targeted training on the SEP and its associated procedures, including the GRM, from the Social Manager. Clear responsibilities and reporting lines will be defined in the SEP and formalised through contractual arrangements.

The designated SEP implementation team (CLOs or CSO/NGO) will be responsible for:

- Conducting all stakeholder engagement activities listed in Table 4-1.
- Receiving, documenting, and addressing grievances submitted through the GRM, including referrals to appropriate service providers in the case of GBVH complaints.
- Maintaining comprehensive records of all consultations, including meeting notes and attendance sheets.
- Reporting monthly and annually to the Social Manager according to the provisions outlined in Section 6.
- Prepare the annual external presentation on SEP implementation (see Table 4-1).

7 Monitoring and Reporting

The implementation of the SEP will be monitored regularly to ensure transparency, continuous improvement, and alignment with project commitments. Monitoring will be based on predefined Key Performance Indicators (KPIs) and associated performance targets.

Reporting will be done monthly and annually.

7.1 Monthly Reporting

Each Community Liaison Officer (CLO) will be responsible for submitting a brief monthly report to the Social Manager. This report will:

- Summarise key activities, achievements, and challenges encountered.
- Provide a performance review against each KPI outlined in Table 7-1.
- Highlight engagement or grievance trends observed and define priorities for the following month.
- List an updated Stakeholder Engagement Log (see Annex 3).
- Attach all evidence of engagement including photos, meeting notes and attendance registers.
- Attached the updated grievance register and any grievance form received in the reporting period.

7.2 Annual Reporting

The Social Manager will consolidate the monthly reports and produce an Annual Stakeholder Engagement Report, which will be submitted to the HSE Director. This annual report will:

- Summarise all stakeholder engagement activities conducted over the year.
- Present an analysis of engagement trends, identify lessons learned and propose adjustments to engagement strategy.
- Report on grievance trends and performance against each KPI outlined in Table 7-1.
- Update the SEP to match priorities for the following year.



Table 7-1 Stakeholder Engagement Monitoring Indicators

Category	KPI	Performance Expectation
Community engagement	Disclosure of documentation	NTS, E&S Assessment of Modernisation Project and SEP disclosed in all communities affected by CPG's operations
	Number of meetings held with community members	One meeting every quarter
	Number of meetings with local authorities per month	One meeting every quarter
	Number of performance presentation workshops	One per year
	No. of thematic workshops or CSR engagement events	At least two per year
	Community training on SEP and GRM	Once before deployment of the SEP and yearly after that
	Women-only GBVH sensitisation	Once before deployment of the SEP and yearly after that
Grievance management	Number of grievances received per month	Monitored to identify trends and systemic issues
	% of grievances acknowledged within 7 days	100% of valid grievances acknowledged within 7 days
	% of grievances resolved within 30 days	At least 90% of grievances resolved within 30 days
	No. of grievances escalated to tier 2	Less than 15% of grievances escalated to tier 2
	No. of grievances brought to court	No grievances brought to court
	No. of GBVH cases received	Maximum one per year
	No. of GBVH-related grievances managed in line with protocol	100% handled with trained female CLO and referred to CSO/NGO support



Annexes



Annex 1 – Grievance Register Template

Complainant's details					Grievance details				Resolution details			Comments / Notes
Grievance No.	Name	Gender	Phone	Email	Submission date	Submission channel	Rejected or verified?	Grievance summary	Date of closure	Resolution provided	Resolution level	



Annex 2 – Grievance Registration Template

Grievance No: ____

Complainant's Details

Name: _____

If you prefer to remain anonymous, please do not write your name

Gender: ☐ Male ☐ Female

Phone number: _____

By email: _____

Grievance Details:

Please describe your grievance below:

Please describe the resolution you would like:



Annex 3 – Stakeholder Engagement Log

Category	Activity	Purpose	Target audience	N. of attendees	% female attendees	Meeting note no./code	Comments / Notes



