



Stakeholder Engagement Plan

Water Transfer Reinforcement in Tunisia

On behalf of the European Bank for Reconstruction and Development

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Acronyms and Abbreviations

ACRONYM	MEANING
AOI	Area of Influences
CHS	Community Health and Safety
CHSS	Community Health, Safety and Security
CSR	Corporate Social Responsibility
E&S	Environmental and Social
ESMS	Environmental and Social Management System
EHS	Environmental Health & Safety
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GBVH	Gender-Based Violence and Harassment
GRM	Grievance Mechanism
IFC	International Finance Corporation
LAAC	Land Acquisition and Compensation
LRP	Livelihood Restoration Plan
OHSAS	Occupational Health & Safety Assessment Series
PAP	Project Affected Person
PK	Point Kilometre, in French
PS	Performance Standards
QHSE	Quality, Health, Safety and Environment
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SoW	Scope of Works
STI	Sexually Transmitted Infections



Glossary

NOTION	DEFINITION
Consultation	Consultation is a two-way dialogue process between the Project sponsor and its stakeholders. Stakeholder consultation involves establishing and maintaining constructive external relationships over time.
Disclosure of information	Disclosure involves making information accessible to the stakeholders including interested and affected parties. Communicating information in a manner that is understandable to stakeholders is an important and ongoing first step in the stakeholder engagement process. Information should be disclosed before any other engagement activities, from consultation and informed participation to negotiation and grievance resolution. This will make engagement more constructive.
Environmental and Social Impact Assessment (ESIA)	A prospective tool for proactively advising decision-makers on what might happen if proposed activities are implemented. Impacts are considered to be environmental, political, economic, or social changes that are significant to society. These impacts can be positive or negative and can affect the environment, communities, human health and wellbeing, desired sustainability goals, or a combination of these elements.
Grievance Redress Mechanism	Procedure established within the framework of a project to receive and resolve concerns and grievances from affected communities regarding the environmental and social performance of the project.
Stakeholder	Stakeholders are individuals or groups who are directly or indirectly affected by a project, as well as those who may have an interest in a project or the ability to influence its outcome, either positively or negatively.
Stakeholder Engagement	Stakeholder engagement is an ongoing process that involves (i) the client publishing appropriate information to enable meaningful consultation with stakeholders; (ii) meaningful consultation with potentially affected parties; and (iii) a procedure or policy enabling individuals to make comments or complaints.

Source: Based on the EBRD's environmental and social requirements 10 (2024) and the associated guidance note on Information disclosure and stakeholder engagement (2023).



1.0 Introduction and Project background

1.1 Project presentation

Against the backdrop of increasing climate variability and water stress, Tunisia faces pronounced regional disparities in water availability. Northern hydrological basins receive rainfall in excess of local demand, with annual precipitation ranging approximately between 400 and 1,500 mm, while central regions experience chronic water scarcity, with significantly lower annual rainfall estimated to be around 200 to 400 mm.

In response to these structural imbalances, the Tunisian Government has initiated the Water Storage, Transfer and Flood Protection Programme (“STPCI II”) which provides for the installation of a fourth 82km water transfer pipeline between the Sejnane Dam and the Medjerda–Cap Bon Canal in Tunisia (“the Project”). Three water transfer pipelines have already been installed under previous phases of the programme over the past two decades, and the current Project builds upon this existing transfer infrastructure to further strengthen inter-basin water redistribution.

1.2 Objectives of the Stakeholder Engagement plan

The methods, procedures, policies and actions undertaken by the General Directorate of Dams and Major Hydraulic Works (DGBGTH) and its partners to engage the public, in a timely manner, with respect to the potential impacts generated by the Project and benefits and are the key subjects of this Stakeholder Engagement Plan (SEP).

This SEP is a strategic document designed to develop a comprehensive and culturally appropriate approach to consultation and information sharing throughout the Project lifecycle. Its purpose is to propose a strategy that:

- Identifies the legal requirements for disclosure and consultation for the Project.
- Identifies stakeholder groups that may be affected by or have an interest in the Project.
- Ensures appropriate engagement with these stakeholders by organizing an effective process for disclosing information and consulting on environmental and social issues that may affect them.
- Maintains a constructive and ongoing relationship with stakeholders throughout the implementation of the Project by actively involving them.
- Establishes a grievance redress mechanism to enable communities and other stakeholders to submit complaints, requests or comments, which will be addressed in a timely manner by the Project.
- Ensures stakeholder engagement free from manipulation, interference, coercion and intimidation, providing relevant, understandable and accessible information in a culturally appropriate format.

1.3 Project Description

1.3.1 Project components summary

The STPCI II comprises several infrastructure components, including:

- **Supply and installation of water transfer pipelines over 82 kilometres (DN1800, nominal capacity of 4m³/s);**
- Construction and equipment of two pumping stations with an individual capacity of 4 m³/s and their loading basins;



- Rehabilitation and equipment of a mini-hydroelectric power plant with a capacity of 2x743kW;
- Installation of a photovoltaic park - if necessary, floating technology - with a capacity of 2,000 kW
- Construction of main hydraulic structures; and
- Small hydraulic structures and transitional structures.

However, the component considered for financing by EBRD, and which is the sole subject of this SEP is limited to the supply and installation of a 82km water transfer pipelines ("the Project"), designed to convey water from the Sejnane Dam to the Medjerda–Cap Bon Canal either by gravity or through pumping, depending on topographical conditions.

1.3.2 Project construction schedule

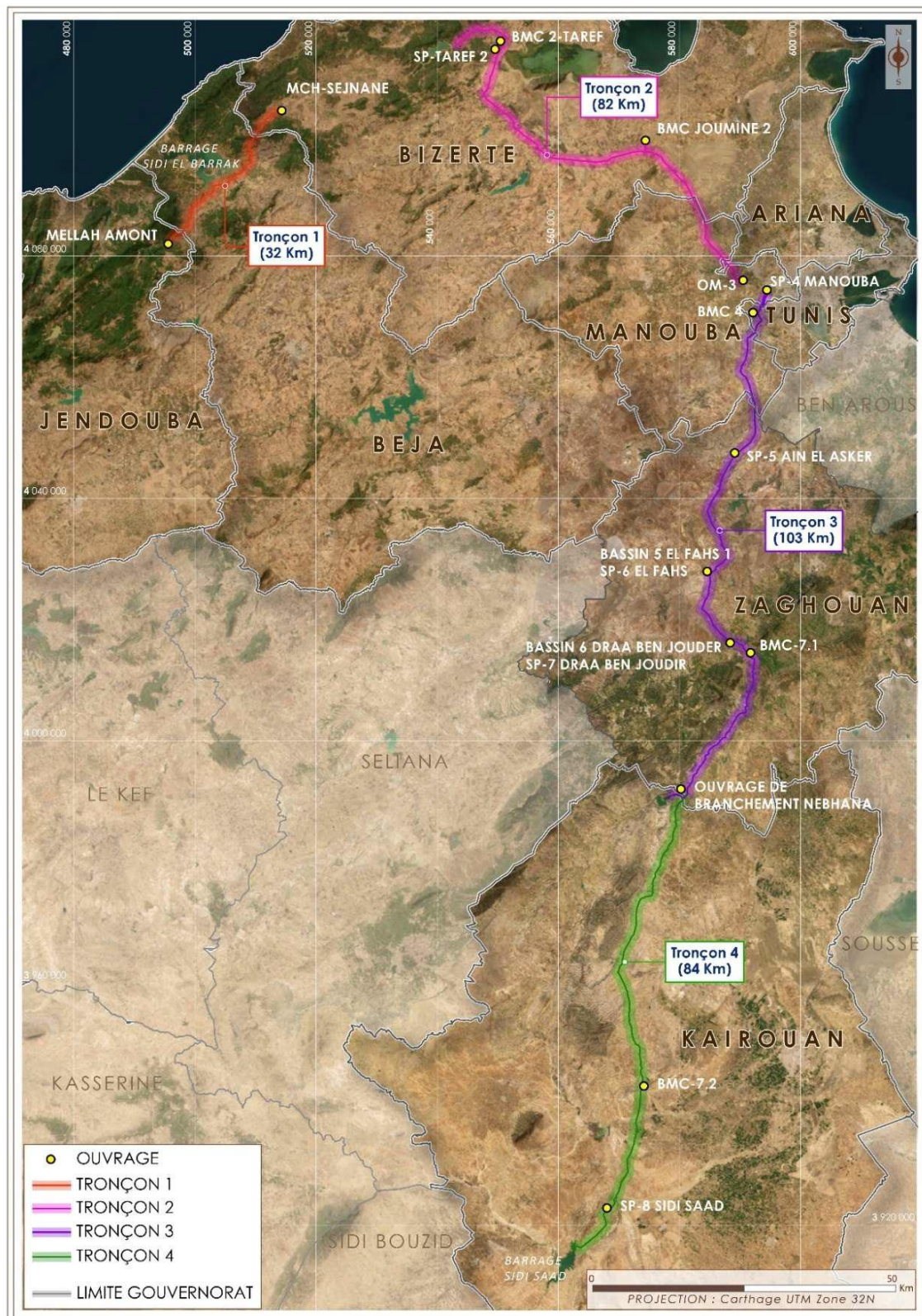
At the time of preparation of this SEP report, the Project is at a preliminary study stage. Key preparatory studies have been completed or are in the process of being finalised, including the Environmental and Social Impact Assessment (ESIA), the Resettlement Policy Framework (RPF), as well as the preliminary design ("Avant Projet Sommaure, APS" in French) and detailed engineering design ("Avant Projet Détaillé, APD in French). The Resettlement Action Plan (RAP) is expected to be finalised by Q2 2026, with land acquisition activities anticipated to be initiated during the third quarter of 2026. The tendering process for the selection of the Engineering, Procurement and Construction (EPC) contractor is expected to be launched in the third quarter of 2026, with the commencement of construction works currently anticipated in early 2027.

1.4 Project location

The STPCI II Programme is located in northern Tunisia, while the Project (Tronçon 2, illustrated by Figure 1-1 below) is located between the Sejnane Dam and the OM3 node, within the governorates of Bizerte and Manouba. The Project will, to the extent possible, be developed within the public domain and alongside the three existing water transfer pipelines already under operations, in order to minimise land acquisition and environmental impacts. Nevertheless, temporary and permanent acquisition of agricultural land will still be required in certain sections to allow for trench excavation, pipeline installation and associated construction works.



Figure 1-1: Project location



1.5 Project Participants

- **General Directorate of Dams and Major Hydraulic Works (DGBGTH):** Responsible for the study, design and construction tendering phases of the Project. The DGBGTH acts as the contracting authority during the upstream phases and oversees the preparation of technical studies and procurement documentation.
- **Project Implementation Unit (PIU):** To be established by decree, the PIU will be responsible for the overall management and supervision of the construction phase of the Project. The PIU will operate with the support of a Technical Assistance consultancy for ensuring technical, environmental and social oversight during construction.
- **SECADENORD:** A state-owned entity that will be responsible for the operation phase of the Project. SECADENORD will commercialise water supplied by the Project to SONED, the national authority in charge of potable water production and distribution, as well as to the Regional Agricultural Development Commissions for agricultural irrigation purposes.
- **Technical Assistance Consultant:** To be appointed to support the PIU during the construction phase, including supervision of works, review and validation of contractors' deliverables, and monitoring of environmental and social performance.
- **Engineering, Procurement and Construction (EPC) Contractor:** Expected to be appointed through a dedicated construction works tender, the EPC contractor will be responsible for detailed engineering, trench excavation, pipeline installation and associated civil works, in accordance with the Project specifications and contractual requirements.
- **Tractebel–Studi Consortium:** Appointed as the Project consultant responsible for the preparation of key environmental and social studies, including the Environmental and Social Impact Assessment (ESIA), the Land Acquisition Plan (LAP), the Livelihood Restoration Plan (LRP), and the Stakeholder Engagement Plan (SEP).

1.6 Previous Stakeholder Engagement Activities

1.6.1 Communications on the Project

As part of the preparation of the ESIA, several meetings were organised over the 2022-2024 period across the administrative centres of the concerned delegations, with the participation of the sector heads (Omda) of the areas crossed by the future water transfer pipeline.

These meetings have made it possible to exchange views on local issues and to collect relevant data through a questionnaire developed for this specific purpose.

The questionnaire has aimed to collect as much information as possible relating to the characteristics and specifics of the natural environment and the socio-economic dimensions of the areas concerned by the Project.¹

At the stage of preparation of the RAP, approximately 9 meetings were held - 6 at governorate headquarters and 3 at delegation headquarters - and 49 meetings were organised in the administrative centres of the concerned sectors, with the participation of the respective sector heads of the concerned areas.

The number of Stakeholders participating in the meetings amounted to 187 participants at the governorate and delegation levels and approximately 679 participants at the sector level, i.e. a total of 866 participants.



These meetings made it possible to inform and raise awareness among Project-Affected Persons (PAPs) and to respond to participants' questions at both regional and local levels.

1.6.2 Periodic communication with stakeholders

Communication with external stakeholders is organised in accordance with Organic Law No. 2016-22 of 24 March 2016 pertaining to Tunisia and relating to the right of access to information, mainly through the DGBGTH website and the media. Information is provided to all interested parties by telephone, postal mail or electronic mail, as well as in paper format.



2.0 Legal Requirements Applicable to Stakeholder Engagement

The stakeholder engagement process has been designed to ensure compliance with the requirements of Tunisian legislation regarding public consultation, as well as with the EBRD Environmental and Social Requirement (“ESR”) 10. This section identifies the principal national and international requirements relating to stakeholder engagement.

2.1 Overview

The Project is classified as Category B according to the EBRD classification, given the expected medium environmental and social impacts. According to EBRD Environmental and Social Requirement 10, a Category B project requires the preparation of an SEP or equivalent documented process, including public consultation and disclosure procedure; internal and external communication methods; public relations procedure, and so on. This SEP is lighter than the enhanced SEP required for Category A projects.

2.2 National Framework

2.2.1 Overview of the Tunisian legal framework

Consultations for ESIAAs are not required by the regulatory texts governing Environmental Impact Assessments (EIAs) in Tunisia. They are, however, required for this Project under EBRD Environmental and Social Requirements, World Bank Standards and the KfW Environmental and Social Appraisal and Sustainability Guidelines.

Legal obligations in Tunisia concerning public consultation are primarily linked to involuntary resettlement. Consultations are mandatory in cases of expropriation, as stipulated by Law No. 2016-53 of 11 July 2016, notably through reference to the “Commission for Acquisitions for the Benefit of Public Projects.”

The composition and operation of this commission are defined by the Decree of the Head of Government dated 13 March 2017.

Consultations are also required for negotiations conducted by the same commission - which replaces the reconciliation commission - at the local level, and which is responsible for compensating for resource losses incurred by individuals occupying land informally. While public consultations are not made mandatory by the National Environmental Protection Agency (“ANPE”), it is nevertheless observed that projects most often make the EIA and the Environmental and Social Management Plan (“ESMP”) available to the public.

Communication activities usually conducted for such projects in Tunisia are consistent with EBRD ESR 10. In this regard, information is generally widely disseminated in order to address citizens’ concerns regarding any negative environmental impact of the project during both the construction and operation phases.

2.2.2 Legislative texts relating to consultation and access to information within the framework of project ESIAAs

While communication with stakeholders is governed by Organic Law No. 2016-22 on the right of access to communication, Tunisia does not have yet a comprehensive and clearly defined stakeholder engagement mechanism or framework. However, following the 2011 revolution, a stakeholder consultation report is required and must be annexed to the EIA.

- **Decree No. 2005-1991 of 11 July 2005 on EIAs** (and ESIAAs): This decree does not address social impacts or social management plans. Analysis of vulnerable populations or gender issues is not required by this decree or by related EIA legislation.



Publication of the ESIA, public consultation or even the ESMP is not a regulatory obligation. Published ESIA's generally concern only large projects financed by donors requiring such disclosure.

- **New Code of Local Authorities** (Organic Law No. 2018-29 of 9 May 2018): Still awaiting implementing decrees concerning consultation, disclosure and grievance redress management.
- **New Code of Spatial Planning, Urban Development and Construction** (pre-final version, December 2015): Not adopted by Parliament. Article 40 provides consultations of councils or commissions representing populations, local authorities, socio-economic bodies and associations for new development programmes and projects within the jurisdiction of the local authority.

2.2.3 Legislative texts relating to access to information

- **Decree-Law No. 2011-41 of 26 May 2011** on access to administrative documents of public bodies: Specifies that such documents mainly concern organisation, manuals, staff lists, programmes, etc.
- **Article 38 of the 2019 Constitution**: Guarantees the right of access to information in accordance with Organic Law No. 2016-22 of 24 March 2016.
- **Organic Law No. 2016-22 of 24 March 2016** on the right of access to information: Defines access rights to information related to programmes and projects, services, financial information, etc., of public administrations. The ESIA is not explicitly mentioned but may be requested via an access-to-information form, subject to the discretion of the competent administrative authority.
- **Government Decree No. 2017-918 of 17 August 2017**: Provides for appeals to the National Authority for Access to Information established under the above law.
- **Article 139 of the Constitution**: Stipulates that local authorities adopt participatory democracy mechanisms and open governance principles for ensuring broad citizen and civil-society participation in the preparation and monitoring of development and spatial-planning projects. A public e-participation portal has been established to support these objectives.

2.2.4 Texts relating to consultation and corporate social responsibility

- **Government Decree No. 2018-328 of 29 March 2018** regulating public consultation: Applicable only to public projects. Recognises that adequate public information, particularly of project-affected persons, strengthens the legitimacy, quality and effectiveness of public policies, and improves long-term project viability.
- **Law No. 2018-35 of 11 June 2018 on Corporate Social Responsibility**: Establishes the principle of reconciliation between institutions and their natural and social environment through sustainable development and good governance. Companies are required to transparently manage consultation and information so that communities genuinely benefit.

2.2.5 Land tenure regime and Tunisian expropriation regulations

Expropriation regulation in Tunisia began with the decree of 9 March 1939, later replaced by Law No. 76-85 of 11 August 1976, and amended by Law No. 2003-26 of 14 April 2003. This law was repealed and replaced by Law No. 2016-53 of 11 July 2016 on expropriation for reasons of public utility, which defines the principles, rules and administrative and judicial procedures governing expropriation of property and land for public-interest projects.



- **Decree-Law No. 2022-65 of October 19, 2022**, amending and supplementing Law No. 2016-53: The decree-law reforms the legal framework for expropriation for public utility by introducing more flexible and transparent procedures, including the possibility for an agreement between the administration and property owners on compensation in kind within the limits of available reserves and establishing permanent “recognition and conciliation” commissions in each governorate to assess properties and mediate disputes. It also expands compensation to cover direct damages to neighbouring properties, clarifies valuation and expert procedures, and aims to accelerate public project implementation while ensuring fair indemnification for affected owners.

This law and its implementing texts form the current legal framework for land acquisition, compensation, dispute resolution and appeals procedures.

The Commission for Acquisitions for the Benefit of Public Projects (“CAPPP”) is responsible for preliminary expropriation procedures at regional level. If agreement is not reached, compensation is determined by expert assessment, and affected owners retain their right to judicial appeal. This law is supplemented by implementing decrees issued in 2017.

Compensation for damage or economic displacement (out-of-procedure mechanisms)

Compensation is provided through Tunisian legal and regulatory frameworks. Donor guidelines often encourage amicable settlements to minimise grievances and legal disputes. The applicable mechanism includes voluntary agreements, negotiation through reconciliation commissions, and intervention by local authorities where necessary. For this Project, a conciliatory approach should be adopted to protect the rights of project-affected persons while ensuring sound management of compensation budgets.

2.3 International requirements

2.3.1 EBRD requirements

The Project is seeking financing from the EBRD and will therefore be structured to meet the requirements of the EBRD's E&S Policy 2024 for Category B projects, including Environmental and Social Requirement (ESR) 10: information disclosure and stakeholder engagement, and to satisfy the Bank's commitment to disclose information about the Project, as outlined in the EBRD's 2024 Access to Information Policy (AIP).

The EBRD's E&S Policy defines stakeholder engagement as an ongoing process which involves:

- Public disclosure of appropriate information;
- Meaningful consultation with stakeholders; and
- An effective procedure or mechanism for individuals to provide comments or raise grievances.

The stakeholder engagement process should begin in the early stages of Project planning and continue throughout the Project's life cycle. The EBRD requires that stakeholder engagement:

- Provide affected communities and other interested stakeholders with access to timely, relevant, understandable, and accessible information in a culturally appropriate manner, free from manipulation, interference, coercion, and intimidation.
- Involve stakeholder identification and analysis, stakeholder engagement planning, information disclosure, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.



- Proportionate to the nature and scale of the project and its potential adverse impacts on affected communities, the sensitivity of the environment, and the degree of public interest
- Based on clearly defined roles, responsibilities, and authority, as well as designated company personnel to be responsible for implementing and monitoring consultation and disclosure activities.

2.3.2 World Bank requirements

The World Bank Environmental and Social Standard (ESS) 10 defines the SEP as a tool used to define and characterise relationships with stakeholders involved at the various stages of Project design and implementation. Its objective is to identify Project stakeholders, analyse their concerns and expectations, and assess their willingness to engage in and support Project implementation. The SEP is also to describe the communication and consultation activities required to ensure effective stakeholder engagement throughout the Project lifecycle.

The World Bank identifies eight key components of an effective and structured stakeholder engagement process including (i) stakeholder identification and analysis; (ii) information disclosure; (iii) stakeholder consultation; (iv) negotiations and partnerships; (v) grievance management; (vi) stakeholder involvement in Project monitoring; (vii) reporting back to stakeholders; and (viii) management functions and responsibilities.



3.0 Stakeholder Identification and Communication Channels

3.1 Objective and presentation

This section of the SEP identifies Project-affected and interested parties, i.e. stakeholders, at local, district, and regional levels. Stakeholders may include individuals or organisations who are directly or indirectly affected by the Project, either positively or negatively, or who wish to express their views regarding the Project. Stakeholders are therefore any person, group, or organisation with an interest in the outcome of the Project, while key stakeholders are those with significant influence on, or significantly impacted by the Project and whose interests and influence must be recognised to ensure successful Project implementation.

One of the objectives of the SEP is also to identify stakeholders - individuals or groups- who may be affected differently due to their particular circumstances. Project activities and conditions may place them at a disadvantage or increase their vulnerability. Accordingly, SEP provides an opportunity to establish a participatory and inclusive process to identify concerns and priorities regarding Project impacts, mitigation measures, and benefits. These priorities may require different or tailored forms of engagement.

3.2 Stakeholder Identification and analysis

In accordance with the EBRD ESR 10, project stakeholders are defined as “*all persons or groups who are affected by a given operation or who influence that operation. These may include individuals, interest groups or groups of companies. Stakeholders may be internal (such as shareholders, managers, staff or public officials) or external (such as persons affected by land or development, landowners, neighbours, occupants of land adjacent to the proposed development, residents’ associations, environmental, living-environment or heritage protection organisations, local elected officials and local authorities, civil society organisations, local businesses, companies, unions, employees, customers and suppliers).*”

In the case of the present Project, stakeholders are those who may potentially be affected, namely individuals or institutions that may be impacted by one or more potential negative impacts of the Project, as well as interest-based stakeholders, which potentially include public institutions concerned by project-related procedures, project beneficiaries, national and international non-governmental organisations, and segments of civil society with an interest in the project.

3.2.1 Stakeholders affected by the Project

These can be divided into three categories:

Affected parties: Individuals, groups and other entities within the project area that are directly impacted - actually or potentially, positively or negatively - by the project. These are also those identified as most likely to be affected by the project and who must be closely involved in the identification of impacts and their significance, as well as in decision-making on mitigation and management measures.

Vulnerable groups: Individuals who may be disproportionately affected or further disadvantaged by the project compared to other groups due to their vulnerability. Specific engagement measures may be required to ensure their equal representation in the consultation and decision-making processes associated with the project.

Interested stakeholders: Individuals, groups and entities who may not directly experience the project’s impacts but who consider or perceive their interests to be affected by the Project and who may influence the Project and its implementation process in one way or another.



The Project will intersect **52 sectors** across **21 delegations** and **8 governorates**. The below table indicates the total population living in each sector crossed by the Project.

Table 1: Populations and sectors crossed by the Project

GOVERNORATE	DELEGATION	POPULATION	SECTOR	POPULATION
Ariana	Sidi Thabet	48 999	Bejaoua	3801
Kairouan	Aïn Djeloula	6 441	Ain Djeloula	4733
			El Karma	2676
			Cherichira	3334
			El Houfia	4864
			Ouled Khalfallah	3076
	Menzel Mehiri	12 680	Ettouila	3523
	Sbikha	77 650	Chogafia	3828
			Sidi Messaoud	5210
Beja	Nefza	47 513	Djebel Ediss	4699
			Cap Negro	1852
			Nefza Est	4701
			Nefza Ouest	8672
			Zaga	2576
Bizerte	Bizerte Sud	75 669	Teskraia	1626
			El Arab	1708
			Ghezala	7560
			Hached	3908
			Ouled El May	966
			Sidi Aissa	1969
	Mateur	49 316	Arab Majour	3529
			Behaya	2491
			Boumkhila	2692
			Cite En Nasr	4612
			Nefat	2460
			Targuella	1811
	Sejnene	41 119	El Ababssa	2625
			Sehabna	3884
	UTique	22 777	Ain Ghelal	2827
			Bach Hamba	3000



			Sidi Othman	1263
Tunis	El Hrairia	11 8229	Ghedir El Golla	20 792
	Sidi Hassine	12 9888	Borj-Chakir	24197
Jendouba	Tabarka	54 151	Nadhour	3655
Zaghouan	Bir Mchergua	27 283	Ain Asker	2851
			Bir M'chergua	7274
			Jebel Oust	6638
			Smenja	3993
	El Fahs	51 214	Banlieu D'el Fahs	14864
			Bent Saidane	1812
			El Amiem Sud	3026
			El Fahs	12581
			Jouguar	2264
			Oued El Khadhra	2489
	En-Nadhour	37 130	Saouar	1554
			Sougas	5663
Manouba	Djedeida	52 713	Chaouat	8412
	Mornaguia	44 764	Bouragba	4041
			Hmaiem	5234
	Oued Ellil	81040	Cite El Ouerd	12487
			Er Riadh	4189
			Sanhaja	9555

Source: INS 2024

3.2.1.1 Stakeholders directly affected by the Project

This category includes stakeholders directly affected by the environmental and social impacts of the Project, including pollution and nuisances, as well as negative social and economic effects, including risks to health and safety, throughout the implementation of the Project.

Considering that the Project impact areas extend beyond the construction right-of-way, the analysis of various social and environmental risks has made it possible to identify distinct individuals and groups of stakeholders affected either directly or indirectly.

Three categories of stakeholders directly affected have been identified:

- Individuals and groups whose activities will be disrupted or negatively impacted by the Project, including farmers or transport operators who may experience temporary impacts during construction or permanent impacts through land expropriation, resulting in loss of income despite the compensation provided;



- Communities living adjacent to the Project right-of-way who, during construction and beyond, will be exposed to environmental and social risks, including accident risks;
- The relevant local authorities, which may experience disturbances.

3.2.2 Stakeholders interested in the Project

Interested stakeholders include all entities and communities involved, whether directly or indirectly affected, including in particular:

- **Relevant government entities**, including sectoral departments, territorial administrative services, and other entities responsible for regulating natural resource use, environmental protection, community health and safety, human well-being, social protection and employment;
- **Local authorities**, as well as communities and populations living near the construction areas, may benefit from employment, job and training opportunities, and improvements in living conditions under the Project;
- **Civil society organisations** - including NGOs - involved in environmental and socio-economic interests, which may act as intermediaries with affected parties and protect community rights, and should become full partners in project implementation;
- **Companies and suppliers** of services, goods and materials which will be involved in or interested in the works more broadly;
- **Technical partners** providing various services and capable of offering technical assistance, advice and support;
- **Lenders** including EBRD; and
- **Media** and associated interest groups, including print, broadcast and audiovisual media, and affiliated associations.

3.3 Stakeholders' analysis

The stakeholders' analysis aims to gain an in-depth understanding of the interests, expectations, and levels of influence of the different groups concerned by the Project. It makes it possible to assess the extent to which each stakeholder will be affected and to determine their potential power over the Project's progress and outcomes.

This approach is based on clarifying the motivations and influence dynamics specific to each actor, in order to define an engagement strategy which identifies priority actions for effective and constructive dialogue.

Stakeholder assessment is carried out using two main criteria:

- Their level of influence, that is, their capacity to influence the project;
- Their level of interest, meaning their degree of concern and engagement with regard to the project's issues.

This assessment is based on factual data, interviews, surveys, or other information-gathering methods. Once stakeholders have been identified and analysed, an appropriate engagement strategy is developed for each category, specifying the communication channels, consultation tools, and participation actions to be implemented throughout the different phases of the project. Accordingly:

- **Stakeholders with a high level of interest and influence will be closely monitored; their expectations will be integrated through active participation, consultation, and regular communication actions.**



- **Those with lower levels of interest and power will mainly be the focus of information and communication actions aimed at maintaining their support and satisfaction.**

Stakeholder analysis thus constitutes a strategic and iterative process, essential for anticipating risks, strengthening the project's legitimacy, and maximising its positive outcomes for all involved. The following table identifies the categories of interested stakeholders and presents their sectoral distribution and their roles within the framework of project implementation. The following table identifies the categories of interested stakeholders and presents their sectoral distribution and their roles within the framework of project implementation.



Table 2: Stakeholders analysis

PHASE	CATEGORY	STAKEHOLDER	ROLE WITHIN THE PROJECT	CONCERNS AND EXPECTATIONS	INFLUENCE	INTEREST	SEP STRATEGY
Each Phase (Development, Construction and Operation)	Central Institution	DGBGTH	Project management, inter-regional coordination, donor compliance	Adherence to deadlines, social acceptability, management of E&S risks	High	High	Close collaboration
	Governmental institution	National Authorities	Technical and institutional implementation	Water security, durability of structures	High	High	Collaboration
	Environment	ANPE	EIA validation, ESMP monitoring	Compliance with environmental standards	High	High	Collaboration
	Environment	ANGED	Construction waste management	Waste traceability, site restoration	High	Low	Satisfaction
	Local authorities	Governorates – Municipality	Local monitoring and mediation	Reduction of nuisance	High	High	Collaboration
	Beneficiaries (Kairouan Zaghouan)	Locale population	Project beneficiaries	Sustainable access to water	Low	High	Communication
	Civil society	NGO Associations /	Social and environmental monitoring	Transparency, consultation	High	Low	Communication / Association



PHASE	CATEGORY	STAKEHOLDER	ROLE WITHIN THE PROJECT	CONCERNS AND EXPECTATIONS	INFLUENCE	INTEREST	SEP STRATEGY
	Vulnerables	Women, small farmers	Vulnerable groups	Protection of livelihoods	Low	High	Communication / Targeted Engagement
	Lenders	EBRD and KfW	Funding and supervision	E&S compliance, sustainability	High	High	Close collaboration
Development	Land	State Domain	Land tenure security	Minimization of disputes	High	High	Collaboration
Construction	Health	Health services	Health monitoring	Protection of local residents and workers	High	Low	Satisfaction
	Employment	Regional Employment Center	Support for local employment	Local temporary jobs	Low	High	Communication
	Neighborhood communities	Households in the neighborhood	Subject to temporary impacts	Nuisance, access, land restoration	Low	Low	Active communication
	Medias	Newspapers / Radios	Dissemination of information	Access to reliable information	Low	Low	Communication
Construction and operation	Security	Civile Protection	Risk prevention and management	Site safety	High	Low	Communication
Operation	Workers	Workers (DGBGTH, companies)	Implementation of activities	Safety and working conditions	Low	High	Communication



PHASE	CATEGORY	STAKEHOLDER	ROLE WITHIN THE PROJECT	CONCERNS AND EXPECTATIONS	INFLUENCE	INTEREST	SEP STRATEGY
Development and operation	Agriculture	CRDA	Irrigation water management	Equitable access to irrigation water	Low	High	Communication
	Natural Environment	Forests Ramsar sites	Protection of sensitive ecosystems	Conservation of forests and wetlands	High	High	Collaboration
	Public companies	STEG SONEDE TELECOM	Protection of existing networks	Continuity of services	Low	Low	Satisfaction
	Farmer	Farmer herders /	Indirect users	Land protection, compensation	Low	High	Communication

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

The table highlights a comprehensive mapping of stakeholders involved in the water transfer Project and entailing the entire Project cycle (studies, construction, and operation). It reveals a diversity of institutional, technical, social, and environmental actors whose expectations, concerns, and levels of influence differ significantly.



3.3.1 Actors with high power and high interests: strategic core of the project

Central institutions (DGBGTH, ONAD, SECADENOR), environmental authorities (ANPE), land management bodies (State Domains), local authorities (governorates and municipalities), sensitive ecosystems (forests and Ramsar sites), as well as lenders (EBRD), are characterised by a high level of power and interest. These actors play a decisive role in:

- **Strategic steering;**
- **Environmental and social compliance;**
- **Land tenure security and**
- **Institutional and financial sustainability of the project.**

SEP Strategy: To ensure close, continuous, and formalised collaboration throughout the Project lifecycle, engagement with relevant stakeholders will be structured through defined coordination mechanisms, regular reporting arrangements, and institutional consultation processes.

3.3.2 Actors with high power but variable interests: regulatory and oversight actors

Certain stakeholders have strong institutional power but show more limited direct interest in the project's benefits, such as:

- ANGED (waste management);
- Health services;
- Civil Protection; and
- Certain public utilities service providers (STEG, SONEDE, TELECOM).

Their main concern relates to compliance with sectoral standards, risk prevention, and continuity of public services.

SEP Strategy: To ensure effective engagement, these stakeholders will be addressed through the provision of targeted information, structured technical coordination, and full compliance with applicable regulatory procedures.

3.3.3 Actors with low power but high interests: key social groups and beneficiaries

Beneficiary communities, neighboring populations, agricultural operators, project workers, regional employment offices, as well as vulnerable groups - women, smallholders) - demonstrate a high level of interest, linked to:

- Sustainable access to water;
- Protection of land and livelihoods;
- Local employment; and
- Safety and working conditions.

However, their power of influence remains limited, exposing them to marginalisation risks if they are not sufficiently involved.



SEP Strategy: To ensure effective and inclusive engagement, communication will be active and continuous, supported by tailored mechanisms for vulnerable groups, including specific consultations, social support measures, and structured grievance management systems.

3.3.4 Actors with low power and low interests: information relays

The media and certain public enterprises have a low level of direct interest and power but nevertheless play an important role in information dissemination and public perception of the project.

SEP Strategy: To support social acceptability and mitigate misinformation risks, communication will be maintained on a regular, factual, and transparent basis.

3.3.5 Cross-cutting role of civil society

NGOs and associations have potential influence, particularly in social and environmental monitoring, although their direct interest may vary depending on the issues involved.

SEP Strategy: To enhance transparency, strengthen project credibility, and improve social risk management, NGOs and associations will be actively involved in communication and consultation processes.

3.3.6 Conclusion

The stakeholder analysis shows that the success of the Project would rely on:

- **Strong institutional collaboration with high-power actors;**
- **Sustained and inclusive communication with populations and beneficiaries; and**
- **Differentiated engagement adapted to the levels of power and interest of each stakeholder category.**

This graduated and phased approach, as proposed in the SEP strategy, constitutes an essential lever to ensure social acceptability, conflict reduction, and the environmental and social sustainability of the water transfer project.

3.4 Vulnerable groups considerations

The following are considered vulnerable groups in particular:

- Individuals with disabilities (physical or mental);
 - Individuals with illnesses, particularly those suffering from chronic, severe or incurable diseases.
- Elderly Individuals, especially those living alone;
- Households headed by women, including divorced women or women living alone;
 - Poor households whose head of household is unemployed and lacks sufficient resources to support the family.
- Individuals who are victims of gender-based violence (GBV);
- Individuals belonging to certain ethnic, cultural or religious minorities; and
- Widows and orphans.

These vulnerable groups may face physical limitations, marital status constraints, or situations of marginalisation and stigmatisation that could prevent them from fully participating in the



Project and in the implementation of this SEP. They may also fail to grasp the project's interest and opportunities.

SEP Strategy: Specific measures must therefore be taken to ensure that they are able to benefit from the Project - particularly in cases of involuntary resettlement and structured in accordance with:

- Conduct consultations in the participants' native languages.
- Develop visual communication materials, such as posters with simple illustrations, to support key messages, particularly regarding the grievance mechanism.
- Disseminate Project information through local radio broadcasts in national languages, where feasible.
- Organise dedicated discussion sessions (e.g. focus groups) for women, separate from men. Similar arrangements should be made for other identified vulnerable groups. These sessions should preferably be facilitated by female staff.
- Implement targeted awareness-raising activities for vulnerable groups on the grievance mechanism and available channels for submitting concerns and complaints.
- Ensure that consultation venues are accessible to persons with disabilities by providing appropriate facilities and support measures, such as access ramps and staff assistance for orientation and mobility.



4.0 Stakeholder Engagement Program

4.1 Principles

The objectives of the external communication and consultation process are to provide continuous engagement with targeted audiences with regard to the activities, performance, development and investment plans.

4.2 General Principles

The DGBGTH will comply with the below principles for the conception and deployment of its public information and consultation initiatives:

- Participation that is free (without coercion), informed (pertinent information being made available before or during the consultation), and in advance (before corresponding decisions are taken);
- Conceive the participation as a dialogue across the whole Project cycle (design, construction, operation phases);
- Respect the requirements of Tunisia legislation concerning public information and consultation;
- Respect international standards, in particular EBRD ESR 10;
- Structure the informing and consultation as a dialogue between the Project sponsor, the affected communities and the other parties concerned;
- Include in the process all relevant stakeholders identified in the current SEP and apply the principles of non-discrimination and transparency;
- Include all groups susceptible to exclusion due to gender, poverty, education, and other factors of social exclusion;
- Effectively take into account contributions, requests and concerns of stakeholders in project decisions; and
- Manage grievances and respond rapidly, fairly and efficiently.

4.3 Language

In Tunisia, **Arabic** is the official language and is used in administration, education and formal written communication. French is also widely used and understood, particularly in urban areas, public administration and among educated populations. In the Project area, however, **Tunisian Arabic** ("derja") remains the language most commonly used in everyday interactions and is likely to be the principal language for a robust engagement process with local communities.

While French may be appropriate for certain institutional communications, the Project may need to communicate in Tunisian Arabic ("derja") during consultations and informal face-to-face interactions with local stakeholders, particularly in rural or less urbanised areas where French proficiency may be limited. It may therefore be necessary to recruit certain Project representatives locally, particularly those interacting directly with rural populations, in order to ensure fluency in the local dialect and facilitate effective communication with affected communities. The Project will therefore apply the following linguistic approach in its stakeholder engagement and communication activities:

- Written communication in **Modern Standard Arabic and French**;



- Oral communication primarily in **Tunisian Arabic** (“derja”), and in **French** where appropriate.

The SEP and the documents supporting the consultation process should also be finalised in **Arabic** by the relevant Project authorities, with the support of the consultant appointed by the EBRD to assist the DGDGTH.

Information disclosed to the public will be made available at key locations, including through noticeboards and other locally appropriate communication channels within affected communities, as required.

The relevant Project authorities will collect, and document comments, concerns and feedback related to the Project. All communications and grievances received will be reviewed in order to assess the feasibility of addressing the requests or concerns raised, and stakeholders will be informed of the outcome where appropriate.

Through adequate communication channels such as local media, public meetings, one-to-one discussions and other forms of community engagement, the Project authorities will monitor stakeholder feedback and provide responses as appropriate.

4.4 Stakeholder Engagement Matrix

4.4.1 Consultation tools and methods

Various engagement techniques may be adopted to establish relationships with stakeholders, gather information from stakeholders, consult stakeholders, and disseminate Project-related information to stakeholders.

When selecting an appropriate consultation method, consideration should be given to consultation methods which are adapted to the culture and the objective of participation of a given stakeholder group. The recommended consultation tools and methods are presented in the table below.

Table 3: Consultation tools and methods with stakeholders

CONSULTATION TOOLS AND METHODS	DESCRIPTION
Public consultations	Public information meetings are one of the most commonly used tools for informing and consulting the public in the context of a project such as the one under consideration here. Such a meeting is publicised in advance through the press, local notices, the internet, radio, and also via administrative channels.
Open day	This is a very useful method for gathering the views of a group of people on specific questions raised at the initiative of the Project, and on which the Project wishes to obtain feedback from senior officials and/or other stakeholders
Workshops	Holding forums and workshops bringing together various stakeholders is a tool for sharing information about the Project, building consensus and fostering the engagement of the various actors involved. Thematic workshops can be organised around a specific topic involving relevant stakeholders at local and national levels.



Face to face interview	This approach is aimed in particular at local authorities, local elected representatives, opinion leaders, etc. This method is an excellent way of engaging these stakeholders.
Focus Group	Focus group discussions involve bringing together a small, relatively homogeneous group of people and inviting them to discuss a specific topic. In practice, this might involve, for example, discussing an issue such as land compensation with a specific group. It may also involve presenting and discussing the arrangements through which local businesses can access the Project's markets, or discussing a specific topic with government officials, representatives of civil society, or representatives of religious or charitable organisations.
Press release	The mass media - newspapers, radio, television, Facebook, websites - offer opportunities to disseminate information on a large scale, through press releases; reports on the project; launch campaigns; interviews with the project management; organised site visits; etc.

The consultation process must be conducted in a manner adapted to the targeted stakeholder, and this process must be free from any manipulation, interference, coercion, discrimination, or intimidation.

The feedback and results of consultation engagement activities - based on the recommended consultation tools and methods - must be documented through the preparation of minutes of meetings signed by the participants and kept as part of the Project's social monitoring documentation.

The following table summarises the consultation approach to be carried out, by stakeholder group families targeted and by associated consultation methods.

Consultation of stakeholders, particularly project managers and environmental authorities, including local authorities - delegates and omdas of the project reference area - acting as representatives of the population, through interviews focusing on the project and its scope.



Table 4: SEP action plan – communication and disclosure

PROJECT PHASE	INFORMATION TO DIVULGATE	PROPOSED METHODES	INDICATIVE AGENDA	TARGETED STAKEHOLDERS	RESPONSIBILITIES
Development	Content, objectives and implementation arrangements for the SEP	Half-day information sessions in each governorate	Prior to initiation of the construction phase.	Regional authorities, local authorities, government technical departments, representatives of civil society	DGBGTH (organisation) / Governor (chair)
	Roles of stakeholders, principles of consultation and mediation	Training and institutional support initiatives	Prior initiation of the construction phase.	Administrative authorities, government technical departments, local authorities	DGBGTH
	Project communication strategy and key messages	Development of a comprehensive communication plan and design of communication materials	Prior to initiation of the construction phase and at each key Project milestone.	All stakeholders	DGBGTH with support from the Consulting Engineer
	Channels for information and dialogue with the public	Establishment of a communication platform (website, social media)	Prior to initiation of the construction phase and prior to any resettlement activities	The general public, local communities, NGOs, the media	DGBGTH



	Procedures for accessing information and making contact	Creation of a freephone number, an email address and a postal address	Prior to initiation of the construction phase and prior to any resettlement activities	Local populations, vulnerable stakeholders	DGBGTH
	Operation of the Grievance Redress Mechanism (GRM)	Design of specific GRM tools	Prior to initiation of the construction phase and prior to any resettlement activities	Affected communities, workers, external stakeholders	DGBGTH
	Procedure for lodging and processing complaints	Production and distribution of brochures, posters and leaflets on the MGP	Prior to initiation of the construction phase and prior to any resettlement activities	Affected communities, local authorities	DGBGTH
Construction	Site activities, potential impacts, mitigation measures	Awareness-raising programme for local residents	Before and during the construction phase.	Local residents, local users	Construction company
	Updates on the progress of the project	Communication sessions (radio, television, print media)	During the construction phase.	General public, local communities, media	DGBGTH
	Local concerns, social and environmental impacts	Quarterly meetings facilitated by a sociologist with local authorities and communities	On a quarterly basis.	Local authorities, representatives of local communities	DGBGTH (technical assistant – sociologist)



	Relevance and effectiveness of communication activities	Ongoing evaluation of the company's communication plan	During the construction phase.	DGBGTH, relevant authorities	Contractor responsible for supervision
Operation	Results of SEP and monitoring complaint management	Publication of results in project progress reports	Bi-annually.	Stakeholders, affected communities, donors	DGBGTH

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



This disclosure and communication action plan ensures progressive, tailored, and continuous information of stakeholders at each stage of the project, in accordance with the EBRD ESR 10 requirements.

In continuity with the meetings already held with sector heads during the ESIA process, additional meetings with Project-Affected Persons (PAPs) likely to be impacted are sheduled prior to the start of the RAP surveys. Below is a table presenting the public consultation programme conducted in the Governorates between the 6th of November 2025 and the 24th of December 2025. A total of 57 meetings were conducted across 8 governorates, representing at over 800 participants.

Table 5 : number of public meetings and participants per governorate

GOVERNORATE	NUMBER OF MEETINGS	NUMBER OF PARTICIPANTS
Manouba	7	106
Ariana	2	21
Tunis	2	21
Zaghouan	12	170
Kairouan	10	+160
Bizerte	16	206
Jendouba	2	43
Béja	6	96

4.4.2 Analysis

The public consultation programme carried out between the 6th of November 2025 and the 24th of December 2025 forms part of a structured and progressive stakeholder engagement approach, in line with the principles of the SEP and EBRD ESR 10 requirements. It has entailed 8 governorates concerned by the project, namely **Manouba, Ariana, Tunis, Zaghouan, Kairouan, Bizerte, Jendouba, and Béja**.

4.4.2.1 General organisation and methodological approach

In each governorate, the consultation process was structured around two complementary levels:

- Institutional and regional level: through information and consultation meetings organised at governorate headquarters, with the participation of stakeholders referenced in the official correspondence addressed to the governors - regional authorities, State technical services, local authorities, institutional representatives;
- Local and community level: through awareness-raising meetings directly targeting affected heads of households, women and young people, organised in the sectors concerned by the project.

This approach made it possible to ensure both institutional ownership of the Project and direct participation of potentially affected populations, thereby fostering inclusive and territorially balanced dialogue.

4.4.2.2 Stakeholder participation and coverage

Local consultations were organised across a significant number of delegations and sectors, with strong involvement of sector heads. The systematic presence of local authorities helped



strengthen the credibility of the process and facilitate the mobilisation of populations. The programme enabled outreach to a significant number of participants: **187 participants at governorate level and 866 participants at sector level.**

4.4.2.3 Topics discussed during consultations

Awareness-raising meetings mainly focused on:

- Presentation of the Project, its objectives and its indicative schedule; identification of areas concerned by the works;
- Potential social impacts, particularly in terms of land occupation, access, and temporary disruptions;
- Principles of the project's social management, including the Resettlement Action Plan (RAP) and the grievance management mechanism (GMM);
- Rights of affected populations and communication arrangements with project structures.

These exchanges made it possible to collect local concerns, respond to community questions, and strengthen understanding of the project's issues.

4.4.2.4 Social inclusion and accessibility

Particular attention was paid to **the inclusion** of women and young people, who were explicitly targeted during community meetings. The choice of venues - close proximity to affected areas -, meeting times, and support from local authorities contributed to improving accessibility of this engagement process, including for the most vulnerable populations.

4.4.2.5 General appreciation

Overall, the public consultation programme may be considered as:

- Territorially extensive, covering all concerned governorates;
- Progressive and well structured, combining institutional-level information and local consultation;
- Compliant with the requirements of the SEP and ESR 10 requirements, in terms of information disclosure, meaningful consultations and inclusion of affected stakeholders.

The outcomes of these consultations constitute an essential basis for refining the Project's social measures, implementing the RAP, and continuously adapting communication actions and the grievance management mechanism throughout the project life cycle.

4.5 Stakeholder engagement frequency

To ensure continuous and effective communication with the various stakeholders throughout the Project life cycle, it is essential to define the frequency of engagements. The table below presents the planned engagement frequencies for each stakeholder group.



Table 6: Stakeholder Engagement Frequency

STAKEHOLDER	ENGAGEMENT FREQUENCY	ESTIMATED BUDGET
Regional authorities, local authorities, government technical departments, representatives of civil society	Once the SEP has been approved	Management Time
Administrative authorities, government technical departments, local authorities	Once the SEP has been approved	Management Time
All stakeholders	Once the SEP has been approved	Management Time
The general public, local communities, NGOs, the media	Once the SEP has been approved	Management Time
Local populations, vulnerable stakeholders	Once the SEP has been approved	Management Time or 1000/2000 USD per month, if carried out by an external consultant.
Affected communities, workers, external stakeholders, local authorities	Once the SEP has been approved	Management Time or 1000/2000 USD per month, if carried out by an external consultant.
Local residents, local users	Before and during the works	Management Time or 1000/2000 USD per month, if carried out by an external consultant.
General public, local communities, media	Throughout the duration of the works	
Local authorities, representatives of local communities	Every 3 months	
DGBGTH, relevant authorities	Throughout the duration of the works	
Stakeholders, affected communities, donors	Every 6 months	

The SEP implementation will primarily require management time and internal resources. However, a provision of USD 15 000 has been factored in relation leaflets, advertising, meeting logistics etc. If an external consultant is engaged, the total annual implementation cost is estimated between USD 25,000 and USD 50, 000.

4.6 Roles and responsibilities

DGBGTH will be ultimately responsible for the implementation of this SEP and will provide the human and financial resources necessary for the different phases of the Project.



DGBGTH will work in coordination with the relevant local authorities, including local and municipal councils within the Project area, in the implementation of this SEP, particularly with regard to public consultation, stakeholder engagement, information disclosure and any land acquisition or expropriation processes, in accordance with applicable national legislation and the requirements of this SEP.

[Person to be defined] will have overall responsibility for managing the stakeholder engagement and information disclosure process. This will include the establishment of a focal points ensuring community dialogue at local level and – in collaboration with the E&S Senior Official – responsible for implementing the planned stakeholder engagement activities, including:

- Organisation of the consultation process;
- Communication with identified stakeholder groups;
- Collection and management of comments and grievances; and
- Coordination of responses to stakeholder concerns and complaints.

Depending on the nature of the comment or grievance received, matters may be referred to the DGBGTH E&S Senior Official for follow-up and response.

Table 7: Contact information in case of a grievance

NAME OF THE PERSON AND TITLE	CONTACT INFORMATION
<i>Name, Position</i>	<i>Address</i> <i>E-mail</i> <i>Phone number</i>

Prior to the commencement of construction works for the STPCI II Project, DGBGTH will appoint one or more focal points ensuring community dialogue at local level to support local stakeholder engagement activities. Where possible, these representatives would be fluent in the local dialects spoken within the Project area. These officers will operate through a locally accessible information and liaison office and will report to the E&S Senior Official.

Their responsibilities will include:

- Organisation of local public information and consultation activities;
- Liaison with local authorities and community representatives;
- Management of grievances in accordance with the Project grievance mechanism; and
- Preparation of regular monitoring reports for Project management covering stakeholder engagement activities, grievances and disputes.

4.7 Focal points ensuring community dialogue at local level

All general comments, questions, and grievances may be submitted through local community dialogue focal points, directly to the E&S Senior Official, or via the dedicated feedback phone number indicated below:

- Name:
- Company:
- Postal address:
- Email address:



- Project website:
- Dedicated grievance phone number:

4.8 Communication

4.8.1.1 Proposed approach

The DGBGTH will make Project information publicly available to enable stakeholders to understand the Project's potential risks and effects, as well as the opportunities it may offer.

Indeed, meaningful stakeholder engagement activities depends on accurate, accessible, comprehensive, and timely information. It is important to disclose Project-related information as early as possible in the Project life cycle, in a manner, form, and language appropriate to each stakeholder group.

Accordingly, DGBGTH will provide stakeholders, as early as possible and according to a timetable that allows for genuine consultation on project design, with access to the following information:

- The purpose, nature, and scale of the Project;
- The duration of Project activities;
- The potential risks and effects of the Project on the local population, and the measures proposed to mitigate them;
- The envisaged stakeholder participation process, including the dates and locations of planned public consultation meetings, as well as the process to be adopted for notifications and reporting on these meetings; and
- The process and channels for submitting and resolving grievances.

4.8.1.2 Information disclosure tools and methods

Information will be disclosed in the relevant local languages and in a manner that is culturally appropriate and accessible, taking into consideration the specific needs of groups that may be affected differently or disproportionately by the Project, or population groups with particular information needs. To this end, the project should combine various information disclosure methods, including:

- Newspapers, posters, radio, and television;
- Information centres and public or other establishments allowing for visual displays;
- Brochures, leaflets, posters, documents, and non-technical summary reports;
- Correspondence and official meetings; and
- A website and social media.

4.8.1.3 Continuous disclosure of information among affected communities

The DGBGTH will ensure the preparation and communication of periodic reports in order to provide affected communities with regular updates, at least once a year, on the implementation and progress of specific aspects associated with the risks or impacts experienced.

These updated information materials made available to affected communities must enable responses to the views or grievances expressed and provide a means of further engaging them in the project's environmental and social performance.



The information disclosure tools and methods proposed above may be used to disseminate these reports. Periodic reports may include:

- Progress made in implementing the Stakeholder Engagement Plan entailing areas into which the communities concerned are continuously exposed to risks or impacts and which have proven to be sources of concern for those communities;
- Information regarding modifications and updates made to the Project that may potentially alter the impacts experienced;
- Substantial changes to the mitigation measures or actions described in the Project addressing the concerns of affected communities;
- Information concerning the adoption of additional measures and actions, whereby new applicable mitigation measures or actions are communicated to the affected populations.



5.0 Grievance Redress Mechanism

5.1 Grievance mechanism general principles

The objective of the grievance redress mechanism (“GRM”) is to implement a formalised procedure - identification, monitoring and remediation - to manage complaints from communities, workers and other stakeholders related to the Project. A grievance redress mechanism must ensure that all comments, suggestions and objections raised by stakeholders are recorded and considered.

The DGBGTH has established a GRM developed within the framework of this Project. The DGBGTH will ensure the implementation of this GRM, in particular the receipt, processing, and registration/documentation of grievances submitted by external stakeholders, notably affected communities, by clearly defining the associated roles and responsibilities. The GRM must be easily accessible to and understandable by members of the affected community and must be communicated to them. The DGBGTH must also guarantee the confidentiality of complainants.

In addition, efforts should be made to seek solutions to complaints by prioritising a collaborative approach with persons affected by the project.

The GRM must not prevent access to other judicial or administrative remedies provided for by law. If the Project is unable to resolve a complaint, an alternative option may be to allow complainants to seek recourse through external specialists or mediators.

The GRM includes several distinct steps, for which responsibility is ensured by a set of actors. A GRM complaint form must be available in **Arabic and French** at each construction zone and downloadable from the DGBGTH website.

Complaints may be submitted by mail, email or telephone. Complaints may also be addressed, submitted and registered at the municipal headquarters - a designated person will be responsible for collecting complaints - and will subsequently be forwarded to the CRDA and/or the Citizens’ Relations Office operating under the Ministry of Agriculture.

These complaints will be transmitted to the DGBGTH, and an address and a contact number will be made available to complainants.

To ensure that all grievances are adequately reviewed and resolved, a grievance register will be maintained, documenting all actions taken to address each grievance.

5.2 Timeline in addressing grievances

For each complaint registered:

- A written receipt will be made within seven (7) calendar days; and,
- A proposal for resolution will be made within thirty (30) calendar days thereafter. Subject to the claimants acceptance of the proposed resolution, referral to a mediation committee may be required following the initial proposal.

The figure below illustrates the grievance resolution process, from submission by the complainant through to final closure.



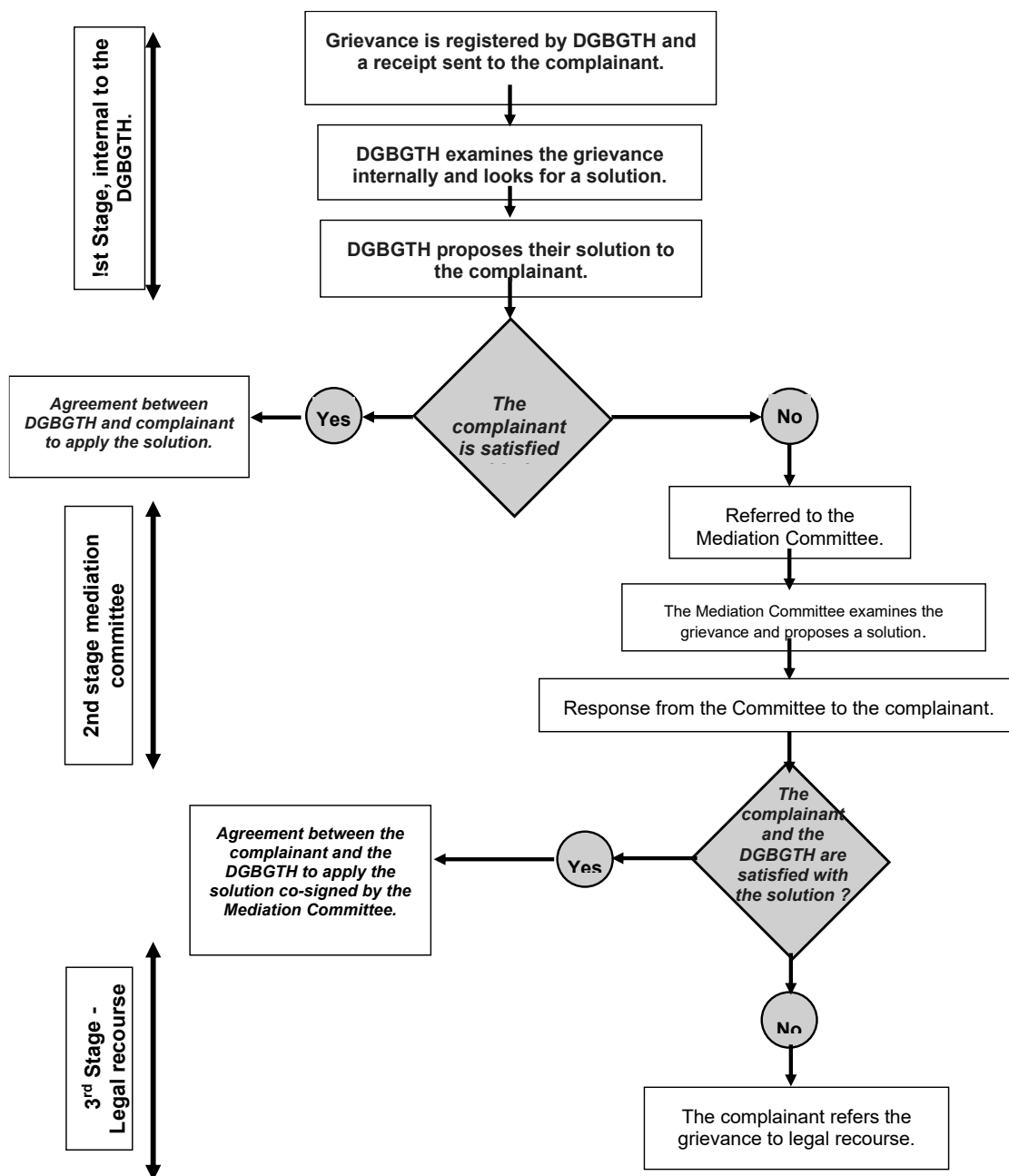


Figure 5-1: Grievance Resolution Stages



5.3 Grievances Register

The Project will maintain a grievance register. The existence of this register and the conditions of access - where it is available, when one can have access to the agents responsible for registering grievances etc. - will be made known to the affected populations as part of the consultation and public information activities.

Presented below is an example of the grievance form.

Public Grievance Form	
Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ ☐ I wish to raise my grievance anonymously ☐ I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	☐ By Post (address): _____ _____ _____ ☐ By Telephone: _____ ☐ By E-mail _____
Preferred Language for communication	☐ Arabic/Derja ☐ French ☐ Other (please specify)
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? 	
Date of Incident/Grievance	☐ Happened more than once (how many times? _____) ☐ On-going (currently experiencing problem)
What would you like to see happen to resolve the problem? 	
Signature: _____ Date: _____	
Please return this form to: [Contact person] [Address] [Tel] [Email]	



5.4 Mediation Committee

To address grievances which could not be resolved during the first stage of review and the above handling process, DGBGTH has established a case-by-case mediation process. A provisional mediation committee has been set up, composed of the following independent and impartial members:

- A representative of the local authorities;
- A representative of the concerned communes; and
- Three to five community representatives, including women's representatives, selected from local communities, traditional authorities, and religious leaders.

The provisional mediation committee is composed of individuals trusted by the various parties involved in the grievance or dispute concerned.

5.5 Procedure for addressing grievances

5.5.1 Grievance registration

The process for addressing grievances is based on the following fundamental principles:

- It must be transparent and in harmony with the local culture;
- Complaints shall be recorded in local language, and their resolutions shall be communicated to complainants verbally and in writing;
- All members of the community - or groups - shall have access to the procedure (whether or not they are beneficiaries, men or women, young or old);
- All complaints and claims, whether real or unreal, must be recorded in accordance with the complaint resolution procedure; and
- All complaints must lead to discussions with the complainant and, if necessary, a site visit to better understand the nature of the problem.

When a grievance or dispute is registered, DGBGTH prepares the relevant technical documentation, such as the proposed compensation, records of interviews or meetings held with the complainant, and the specific grounds for the grievance.

The complainant(s) are then invited to appear before the mediation committee, which seeks to identify a solution acceptable to both parties (i.e. DGBGTH and the complainant). Additional meetings may be organised as required, and the committee may appoint one of its members to continue mediation in a less formal setting between the monthly meetings.

5.5.2 Grievance Management in case of GBVH

5.5.2.1 Specific Nature of GBVH-Related Grievances

Due to their sensitive and confidential nature, Gender-Based Violence and Harassment (GBVH) grievances cannot be managed through the standard grievance resolution process. GBVH cases require a dedicated, survivor-centred approach adapted to the specific risks and protection needs associated with such complaints.

5.5.2.2 Forms of Gender-Based Violence

GBV may take various forms, including rape and sexual assault, physical violence, harmful socio-cultural practices that violate individual freedoms (e.g. forced marriage or female genital



mutilation), sexual harassment, denial of access to resources or opportunities, and psychological or emotional abuse.

5.5.2.3 Project-Related GBVH Risk Factors

The Project may contribute to GBVH risks through factors such as:

- Power imbalances between workers, communities, and local institutions; and
- The influx of predominantly male workers into nearby communities, potentially increasing the risks of transactional sex, sexual exploitation, abuse, or violence.

5.5.2.4 Grievance Registration

A designated focal point trained in GBVH issues shall be available to receive and manage GBVH-related grievances. Before taking any further action, the focal point receiving the complaint must ensure that the complainant's informed consent is obtained, including consent for:

- Verification of the information shared by the complainant; and
- Safe follow-up contact with the survivor, where applicable.

5.5.2.5 Grievance Resolution

The management of GBVH-related grievances must be guided by the following principles:

- Safety of the complainant;
- Confidentiality;
- Informed consent and survivor-centred decision-making; and
- Respect, non-judgement, and non-discrimination.

Prior to any resolution process, the grievance may be verified solely to determine whether it is linked to the Project. Verification must never seek to establish the guilt or innocence of the alleged perpetrator, as this falls under the responsibility of the police and competent referral services operating in the Project area.

Where the complainant chooses to pursue a formal complaint, the matter shall be referred to the competent judicial authorities. The verification process will be conducted by the grievance resolution team with support from the GBVH specialist.

Where the complainant agrees, the following information may be collected to support further investigation and referral: age, sex, location of the incident, type of violence reported (as described by the survivor), link to the Project (as described by the complainant) and care and support services already accessed, or referrals made through the grievance process, where applicable.

5.5.2.6 Coordination and Reporting

The grievance resolution team, with support from the GBVH specialist, shall organise biannual review meetings to assess progress, identify challenges, and evaluate the effectiveness of GBVH grievance management. The grievance resolution team shall also report suspected or confirmed GBVH incidents in accordance with the Project's incident reporting and referral procedures.



5.6 Independent accountability Mechanism for EBRD projects

All EBRD-financed projects must be structured to meet the requirements of the [EBRD's Environmental and Social Policy](#) (2024), which includes ten ESRs in key areas of environmental and social sustainability that projects must meet, including ESR 10 on stakeholder engagement.

In addition, [the EBRD's Independent Project Accountability Mechanism \(IPAM\)](#) - as an independent tool of last resort - aims to facilitate the resolution of social, environmental, and public disclosure issues raised by project-affected persons and civil society organizations regarding EBRD-financed projects among project stakeholders, or to determine whether the Bank has complied with its Environmental and Social Policy and the project-specific provisions of its [Access to Information Policy](#); and, where appropriate, to remedy any breaches of these policies, while preventing any future breaches by the Bank.



6.0 Reporting

DGBGTH will ensure stakeholder participation in Project monitoring activities, including the monitoring of associated impacts and mitigation measures outlined in safeguard instruments such as the ESMP, ESIA, and RAP, with particular involvement of negatively affected populations.

In line with Environmental and Social Standard No. 10 (ESR10 – Stakeholder Engagement and Information Disclosure), DGBGTH will implement management tools to ensure that stakeholder engagement remains inclusive, continuous, documented, and adaptive throughout the Project life cycle. Monitoring indicators will include, among others, the number and type of engagement activities conducted (e.g. public consultations, workshops, meetings with local leaders and stakeholder groups) and the number of participants. The outcomes of stakeholder engagement activities and SEP implementation monitoring will be regularly documented and communicated to relevant stakeholders through the same communication channels used for Project notifications, in accordance with the formats and timelines previously defined. The existence of the grievance redress mechanism will also be systematically communicated to stakeholders.



Table 8: SEP management tools in line with ESR10

ESR REQUIREMENTS	10	MANAGEMENT TOOLS	OBJECTIVES	RESPONSIBLE	PERIOD	SUPPORT
Identification and analysis of stakeholders		Stakeholder register	Identify, analyse and update stakeholders, including vulnerable groups	DGBGTH / Social team	Ongoing (minimum annual review)	Database
Disclosure of relevant information		Information disclosure plan and register	Ensuring early, accessible and appropriate dissemination	DGBGTH	In accordance with the project schedule	Paper and digital formats
Significant consultation		Public Consultation Register	Documenting consultations, participants, concerns and responses	DGBGTH / social consultant	After each consultation	Spreadsheet / Minutes
Taking into account feedbacks		Minutes and response matrices	Incorporating concerns into the design and implementation of the project	DGBGTH	After each activity	Written documents
GRM		Centralised grievances register	Record, monitor and resolve complaints in a transparent manner	DGBGTH / focal point GRM	Ongoing	Secured Database
Accessibility and inclusion		Multilingual complaint forms	Facilitate access to the MGP	DGBGTH / Municipality	Permanent	Paper / Web
Performance monitoring		SEP performance indicators	(Arabic/French, illiterate people, women)	DGBGTH	Quartely / annually	Dashboard
Reporting to stakeholders		NES 10 monitoring reports	Assess the quality and effectiveness of engagement	DGBGTH	Annually	Written reports



Tracability and accountability	SEP archiving system	Provide information on progress, impacts and responses	DGBGTH	Ongoing	Physical and digital archives
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Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



6.1 Stakeholder engagement plan reporting

Stakeholder engagement activities shall continuously document the following information:

- Type of information disclosed, the format used - e.g. oral communication, brochures, reports, posters, radio, newspapers, etc. -, and the means of dissemination;
- Locations and dates of meetings and consultations conducted;
- Individuals, groups, and/or organisations consulted;
- Key issues discussed and main concerns raised;
- Responses provided to issues raised, including commitments made and follow-up actions; and
- Processes used to document engagement activities and report back to stakeholders.

6.2 E&S Senior Official reporting

The E&S Senior Official's report will provide a detailed overview of the stakeholder engagement activities and key processes implemented under this SEP. It will include, in particular:

- A record of communication activities carried out, including newspaper and media announcements, as well as press releases;
- Minutes of consultation meetings, including dates, venues, participant lists, and photographs;
- Records of original written correspondence related to consultations, including comments received, serving as evidence of the consultation process and its outcomes; and
- A grievance register and monitoring system, whereby each complaint is recorded, assigned a reference number, and subject to detailed follow-up documenting the actions taken toward its resolution and closure.

6.3 Annual reporting

In addition to the monthly internal reports produced by the E&S Senior Official, DGBGTH also incorporates the following elements into its annual environmental and social monitoring report submitted to the EBRD:

- The main consultation and public information activities carried out during the calendar year;
- The functioning of the information office and the resources allocated to consultation and information activities;
- Information related to the DGBGTH website, including documents disclosed and the contact form; and
- Information related to grievances and disputes, including:
 - Classification of grievances (e.g. environmental, land acquisition and compensation, information-related, other);
 - Number of grievances opened during the reporting period and their classification;



- Number of grievances closed during the reporting period to the satisfaction of the complainant;
- Number of grievances remaining open (under internal review or review by the mediation committee); and
- Average time taken to resolve grievances.

6.4 Performance assessment

The effectiveness of stakeholder engagement activities will be assessed against the objectives defined in the SEP. This evaluation will review the extent to which the activities outlined in the SEP have been implemented and the intended objectives achieved. The findings of the evaluation, together with lessons learned, will be incorporated into subsequent updates of the SEP

The table below lists some KPIs to track.

KPIs
Number of consultation meetings organized (by phase and type of audience)
Number of participants, broken down by gender, age, and vulnerability status
Number of information materials produced and distributed (posters, notes, web publications)
Stakeholder satisfaction rate (via feedback or simple surveys)
Number of comments and complaints received, rate of processing and closure
Average response time to comments or complaints
Participation rate of vulnerable groups in consultations



Annex 1: Details of stakeholders consultations



Manouba governorate

Table 9: Information and consultation meeting at the Manouba Governorate headquarters on 7 November 2025 at 4 pm

TARGET	DATE	PLACE	TIME	TOPIC	NB PARTICIPANT	OBSERVATIONS
Stakeholders	07/11/2025	governorate headquarters	14h	Organisation of an information and consultation meeting.	53	With the governor
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 10: Analysis and engagement of regional and local stakeholders

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	25/11/2025 - 9h	Jdaida	Chaouat	Raising awareness and providing information to heads of households, women and young people affected	12	in the presence of the sector chef
	26/11/2025 - 9h	Oued Ellil	Sanhaja		7	in the presence of the sector chef
	27/11/2025 - 14h		Cité El Ward		8	
	28/11/2025 - 9h		Er Riadh		1	
	28/11/2025 - 10h	Mornaguia	Hmaiem		13	in the presence of the sector chef



	28/11/2025 - 14h		Bouragba		12	in the presence of the sector chef
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Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Ariana Governorate

Table 11: Information and consultation meeting at the headquarters of the Ariana Governorate on 6 November 2025 at 4 pm

TARGET	DATE	PLACE	TIME	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Stakeholders	06/11/2025	headquarters of the Ariana Governorate	16h	Organisation of an information and consultation meeting.	9	With the governor
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 12: Awareness-raising meetings in the relevant sectors of the Ariana Governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	26/11/2025 at 10 h	Sidi Thabet	Béjaoua	Raising awareness and providing information to heads of households, women and young people affected	12	in the presence of the sector chef

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



Tunis Governorate

Table 13: Awareness-raising meetings in the relevant sectors of the Tunis Governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	01/12/2025 at 9 h	Sidi Hsine	Borj Chakir	Raising awareness and providing information to heads of households, women and young people affected	12	in the presence of the sector chef
	01/12/2025 at 14 h	El Hraïria	Ghdir El Golla		9	

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Zaghouan Governorate

Table 14: Information and consultation meeting at the headquarters of the Zaghouan Governorate on 7 November 2025 at 9 am

TARGET	DATE	PLACE	TIME	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Stakeholders	07/11/2025	headquarters of the Zaghouan Governorate	9h	Organisation of an information and consultation meeting.	9	With the governor
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



Table 15: Awareness-raising meetings in the relevant sectors of the Zaghouna Governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	02/12/2025 at 10h	Fahs	Amaem Sud	Raising awareness and providing information to heads of households, women and young people affected	8	in the presence of the sector chef
	02/12/2025 at 9h	Jebel Ouest	Ain Asker		14	
	03/12/2025 at 10h		Jebel Ouest		11	
	03/12/2025 at 14h	Fahs	Bint Saïdane		13	
	04/12/2025 at 10h	Bir	Bir Mchargua		10	
	04/12/2025 at 14h	Mchargua	Smenja		8	
	05/12/2025 at 10h	Fahs	Oued El Khadra		21	
	05/12/2025 at 14h		Draa Ben Jouider		24	
	05/12/2025 at 16h		Fahs Sud		04	
	08/12/2025 at 10h	Nadhour	Souar		29	
	08/12/2025 at 14h		Souhas		14	
TOTAL					161	

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



Kairouan Governorate

Table 16: Information and consultation meeting in the Kairouan Governorate on 24 November 2025 at 2 pm

TARGET	DATE	PLACE	TIME	TOPIC	OBSERVATIONS
Stakeholders	24/11/2025	Kairouan Governorate	14h	Organisation of an information and consultation meeting. Analysis and engagement of regional and local stakeholders	With the governor

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 17: Awareness-raising meetings in the relevant sectors of the Kairouan Governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	09/12/2025 at 9 h	Sbikha	Sidi Messaoud	Raising awareness and providing information to heads of households, women and young people affected	12	in the presence of the sector chef
	09/12/2025 at 14 h		Choggafia		9	
	10/12/2025 at 9 h	Ain Jloula	Ain Jloula		28	
	10/12/2025 at 14 h		Jebel Ouslet		1	
	11/12/2025 at 9h	Menzel Mhiri	ETTouila		42	
	11/12/2025 at 14h	Haffouz	Ouled Khalfallah		21	
	13/12/2025 at 9h		Houfia		20	
	22/12/2025 at 10h		Cherichira		15	
	12/12/2025 at 14h	Chbika	El Karma		12	
TOTAL					160	

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



Bizerte Governorate

Table 18: Information and consultation meeting at the headquarters of the Bizerte Governorate on 15 December 2025 at 9 am

TARGET	DATE	PLACE	TIME	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Stakeholders	15/12/2025	headquarters of the Bizerte Governorate	9h	Organisation of an information and consultation meeting.	42	With the Secrétaire General of the governorate
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 19: Awareness-raising meetings in the relevant sectors of the Bizerte Governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	15/12/2025 at 10h	UTIQUE	Ain Ghlel	Raising awareness and providing information to heads of households, women and young people affected	15	in the presence of the sector chef
	15/12/2025 at 14h	Mateur	Terguellech		42	
	16/12/2025 at 10h		Bahia		4	
	16/12/2025 at 14h		Arab Majour		1	
	17/12/2025 at 9h		Boumkhia		8	
	17/12/2025 at 14h		Cité Ennaser		1 (omda)	State Domain
	18/12/2025 at 10h	UTIQUE	Bach Hamma		13	in the presence of the sector chef
	18/12/2025 at 14h	Mateur	Naffet		5	



	19/12/2025 at 9h	Bizerte sud	Teskraya		12	
	19/12/2025 at 14h	Sedjnane	Ababsa		12	
	20/12/2025 at 9h		El Arab		8	
	20/12/2025 at 14h		Sidi Aissa		8	
	21/12/2025 at 9h	Ghezala	Ghezala		13	
	21/12/2025 at 14h		Hached		23	
	21/12/2025 at 16h		Sidi Othman		07	
TOTAL					164	

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Jendouba Governorate

Table 20: Information and consultation meeting at the headquarters of the Tabarka delegation on 18 December 2025 at 11.00 am

TARGET	DATE	PLACE	TIME	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Stakeholders	18/12/2025	headquarters of the Tabarka delegation	11h	Organisation of an information and consultation meeting.	42	With the delegate
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026



Table 21: Awareness-raising meetings in the relevant sectors of the Jendouba governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Affected Household heads, women and young people	23/12/2025 at 14 h	Tabarka	En Nadhour	Raising awareness and providing information to heads of households, women and young people affected	1 (Omda)	Forest Domain (minute signe by the Sector Chef)

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 22: Information and consultation meeting at the headquarters of the Béja governorate on 24 December 2025 at 2 pm

TARGET	DATE	PLACE	TIME	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
Stakeholders	24/12/2025	headquarters of the Béja governorate	14h	Organisation of an information and consultation meeting.	42	With the governor
				Analysis and engagement of regional and local stakeholders		

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026

Table 23: Awareness-raising meetings in the relevant sectors of the Béja governorate

TARGET	DATE	DELEGATION	PLACE	TOPIC	NB OF PARTICIPANT	OBSERVATIONS
	23/12/2025 at 9 h	Nefza	Cap Nigro	Raising awareness and	20	in the presence of the sector chef



Affected Household heads, women and young people	22/12/2025 at 14h		Jebal Eddis	providing information to heads of households, women and young people affected	1 (Omda)	State Domain in the presence of the sector chef
	23/12/2025 at 9h		Zaga		17	
	24/12/2025 at 9h		Nefza Sud		8	
	24/12/2025 at 14h		Nefza Nord		8	
TOTAL					54	

Source: Stakeholder Engagement Plan, Lahmeyer International GmbH, 2026





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