



120 MWp Gafsa Solar Power Plant



Stakeholder Engagement Plan

06/02/2026





ASF Consulting
Your Sustainability Partner

8 Résidence Essafa Ennasr 2 2001 Ariana
TunisiaAwatef.siala.fourati@asfconsulting.org
www.asfconsulting.org



Quality Page

Project	
Project to relocate a 120 MWp photovoltaic power plant in Gafsa	
Document title	SEP
Prepared by	
Client	
VERSION No.	F
Document version	
Rev. No.	Revision details
Version A-01-09-25	Submitted for comments from Qair and funders
Version B-13-09-25	Revised following comments from the EBRD
Version C-26-10-25	Revised following comments from donors
Version D-11-11-25	Revised following comments from the EIB
Version E-28-11-2025	Revised following the results of the public consultation
Version F-6-02-2026	Revised following comments from the EIB (anonymous version)

Summary

1.	Introduction.....	1
1.1.	Background and project description.....	1
1.2.	Objective of the SEP	1
2.	Regulatory and institutional framework	2
2.1.	National legal requirements	2
2.2.	Donor requirements regarding stakeholder engagement	4
2.3.	Convergences and divergences between national and international regulations	5
3.	Identification and analysis of stakeholders	8
3.1.	Mapping methodology.....	8
3.2.	List of stakeholders	9
3.2.1.	a) Affected stakeholders	9
3.2.2.	b) Interested stakeholders	10
3.3.	Stakeholder mapping	11
3.4.	Vulnerable groups :.....	15
3.4.1.	Definition.....	15
3.4.2.	Identification methodology	15
3.4.3.	Recommended approach	16
4.	Summary of previous consultations.....	17
4.1.	Consultation activities already carried out	17
4.1.1.	Methodological approach.....	17
4.1.2.	Consultations with stakeholders	18
4.2.	Further consultations and coordination underway	20
4.3.	Results of the E&S document feedback meeting – Sidi Bouzid.....	20
4.3.1.	Introduction	21
4.3.2.	Key outcomes of the feedback session :	21
4.4.	Consultation Plan.....	23
5.	Stakeholder engagement strategy and disclosure of information.....	26
5.1.	Specific objectives of engagement:	26
5.2.	Documents to be published	27
5.3.	Languages of publication	27
5.4.	Distribution channels.....	27

5.5.	Methods of informing the public about availability	27
5.6.	Information dissemination plan	28
6.	Grievance Management Mechanism (GM).....	30
6.1.	Introduction and objectives	30
6.2.	Types of complaints handled	30
6.3.	Operating principles of the GM	31
6.4.	Complaints handling process	31
6.5.	Monitoring, evaluation and reporting of complaints	38
6.6.	Commitment of the developer	39
6.7.	Specific mechanism for managing complaints related to gender-based violence (GBV) 40	
6.7.1.	Specific objectives of the GBV-GMM.....	40
6.7.2.	Key principles	40
6.7.3.	Procedures for receiving and processing complaints	40
6.7.4.	Handling and referral	41
6.7.5.	Follow-up and documentation.....	41
6.7.6.	Developer's commitment	41
6.8.	EBRD Independent Project Accountability Mechanism	41
6.9.	EIB Group Complaints Mechanism.....	42
7.	Monitoring, reporting and updates.....	43
7.1.	Engagement performance indicators	43
7.2.	Periodic reports.....	44
7.3.	SEP Update	44
8.	Organisation and responsibilities.....	46
8.1.	SEP governance structure	46
8.2.	Distribution of responsibilities	46
9.	Indicative budget	47
9.1.	Minutes of the Qsar Delegation meeting.....	48
9.2.	Minutes of the meeting at the Gafsa Governorate	50
9.3.	Minutes of the meeting with SNCFT Gafsa.....	52
9.4.	Minutes of the meeting with the Regional Directorate of State Property	53
9.5.	Minutes of the CRDA CES meeting	54
9.6.	Minutes of the CRDA District Soil Committee meeting	56
9.7.	Minutes of the meeting with INP Gafsa.....	58
List of figures		
	Figure 1: Complaints Management Process	38

List of Tables

Table 1: Similarities and differences between national and international regulations	6
Table 2 Stakeholder mapping	12
Table3 : Register of consultations carried out	19
Table 4 Consultation Plan	23
Table 5 Information dissemination plan.....	28
Table 6 Timelines for the MGP stages	37
Table 7 Stakeholder engagement performance indicators.....	43

1. Introduction

1.1. Background and project description

The main objective of the Tunisian Solar Plan (PST) is to launch concrete programs to rationalise the country's energy consumption and develop the use of national renewable energy sources. It reflects Tunisia's ambition to establish itself as a regional and international hub for industrial and energy production and export, particularly in the field of solar energy.

In this context, the Ministry of Industry, Energy and Mines has launched a tender for the generation of electricity from renewable energy sources. In response to this call, the Qair Group, an international player in the renewable energy sector, has initiated the development of a 120 MWp solar photovoltaic power plant project.

The project involves the construction of a solar photovoltaic power plant in the Gafsa region, El Ksar district, in the locality of El Aguela. Subject to the private concession regime, the site occupies four plots with a total area of 223 ha. The site is located approximately 8 km from the city of Gafsa, 5 km from Mdhilla and 30 km from Metlaoui. The electricity generated will be transmitted via a power line to the STEG substation in Mdhilla (150/33 kV), approximately 10 km from the site.

To support this project, the Qair Group has commissioned the consultancy firm ASF Consulting to carry out a comprehensive Environmental and Social Impact Assessment (ESIA), including an Environmental and Social Management Plan (ESMP) and a Stakeholder Engagement and Participation Plan (SEPP), as well as a Land Acquisition and Resettlement Framework (CATR), in accordance with current Tunisian regulations and applicable international standards, notably those of the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD). This assignment aims to ensure that the project is implemented in a responsible, inclusive and sustainable manner, by identifying potential impacts, consulting with stakeholders and putting in place appropriate management measures.

1.2. Objective of the SEP

This Stakeholder Engagement Plan (PEPP) has been drawn up as part of the development of two solar photovoltaic power plant projects located in El Khobna (Sidi Bouzid governorate) and

El Ksar (Gafsa governorate), Tunisia. These projects, led by the Qair Group under the private concession scheme, are fully aligned with the national energy transition strategy and benefit from joint financial support from the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB) and the International Finance Corporation (IFC).

The preparation of these PEPPs aims to ensure a structured, inclusive and transparent process of stakeholder engagement, in accordance with the requirements of EBRD Performance Requirement 10 (EP10), as well as EIB NES 2 and IFC Performance Standard 1 (PS1) relating to stakeholder information and participation. It also draws on international best practices in environmental and social sustainability.

Stakeholder engagement is a key lever for ensuring the social acceptability, environmental sustainability and operational effectiveness of projects. It enables the establishment of constructive and ongoing relationships with local stakeholders, the identification of potential social and environmental concerns, and their integration into the design, implementation and monitoring of projects.

Accordingly, the objectives of this PEPP are to:

- Identify the stakeholders affected by the projects, in particular the affected communities and vulnerable groups;
- Assess the interests and influence of each stakeholder through stakeholder mapping;
- Define procedures for information, consultation and participation tailored to the local context;
- Describe the mechanisms put in place to collect and address stakeholders' comments, concerns and complaints throughout the project lifecycle;
- Provide a framework for monitoring, updating and managing stakeholder engagement.

2. Regulatory and institutional framework

2.1. National legal requirements

In Tunisia, the regulatory framework governing stakeholder participation is constantly evolving, with notable progress in the recognition of the right to citizen participation, although no structured and binding mechanism specifically dedicated to infrastructure projects or environmental and social impact assessments (ESIA) is yet in force.

The article 38 of the Tunisian Constitution, as amended in 2022, guarantees the right of access

to information. Article 139 requires local authorities to adopt mechanisms for participatory democracy, enabling citizens and civil society to contribute to the design, monitoring and evaluation of development projects. These provisions are reinforced by Organic Law No. 2018-29 of 9 May 2018 on the Local Authorities Code, which establishes a legal basis for citizen participation in local decision-making processes, notably through consultations, advance publication of draft decisions, suggestion registers, and even local referendums.

However, the effectiveness of these provisions remains subject to the publication of implementing decrees, which are currently under discussion.

With regard to environmental assessment, Decree No. 2005-1991 on environmental impact assessments (EIA) remains the regulatory framework. This decree requires a public consultation to be carried out for projects subject to an EIA, but does not specify the procedures for public participation, nor the specific measures to be taken in favour of vulnerable groups or gender equality. In-depth social analysis, grievance management and the ongoing participation of stakeholders are not explicitly regulated by national legislation.

Nevertheless, since 2011, the National Environmental Protection Agency (ANPE) has required, as part of EIA procedures, the inclusion of a stakeholder consultation report, a practice that is now common for projects supported by international donors. These requirements are generally modelled on the standards of financial institutions such as the EBRD, the IFC or the AfDB.

Furthermore, Organic Law No. 2016-22 on the right of access to information stipulates that any citizen may request information relating to public projects. Every public body is required to appoint an information access officer, and an independent body has been established to handle related requests and complaints.

In the field of local development and the energy transition, Tunisia has gradually incorporated the principles of citizen participation through various reforms and decentralisation initiatives. These developments are part of a broader commitment to bringing citizens closer to decision-making processes, particularly in the planning and monitoring of structural projects, such as energy infrastructure. Local authorities, regional state representatives and civil society are playing an increasingly active role in identifying needs, regional consultation and dialogue regarding the social and environmental impacts of projects.

Thus, in the absence of a unified and binding framework, stakeholder participation in infrastructure projects in Tunisia is based on a combination of constitutional, legal and administrative requirements. Compliance with international standards remains today one of the key drivers for strengthening participation, particularly in projects co-financed by the EBRD, the EIB and the IFC, as is the case with the Gafsa and Khobna solar projects.

2.2. Donor requirements regarding stakeholder engagement

The Gafsa and Khobna projects are co-financed by the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB) and the International Finance Corporation (IFC). As such, they must comply with international requirements regarding stakeholder engagement as defined respectively in the EBRD's Environmental and Social Standard 10 (EES10), the EIB's NES 2 – Stakeholder Dialogue, and the IFC's Performance Standard 1 (PS1).

EP10 – EBRD: Stakeholder Engagement

According to EES 10, stakeholder engagement is an ongoing process that must begin at the earliest stages of the project. It involves:

- Identifying affected and interested parties, with particular attention to vulnerable groups;
- Disclosing relevant information about the project in a culturally appropriate language and format;
- Meaningful consultation, based on clear information, prior to any final decision-making;
- The establishment of a Stakeholder Engagement Plan (SEP), tailored to the project's risks, and an accessible and transparent complaints management mechanism;
- Ongoing communication throughout the project cycle, including through regular reports to affected parties ESP_PR10_Eng.

Standard 2 – EIB: Dialogue with stakeholders

The EIB regards stakeholder dialogue as an inclusive, structured and iterative process , which aims to:

- Ensure access to information, participation in decision-making and access to redress mechanisms;
- Identify and analyse stakeholders, including vulnerable and marginalised groups;
- Implement a complaints-handling mechanism that respects rights, free from intimidation or reprisals;
- Develop a Stakeholder Engagement Plan (SEP) or equivalent, including procedures for consultation, monitoring and adaptation;
- Maintain an ongoing and constructive dialogue, documenting contributions and adjusting the measures taken

NP1 – IFC: Stakeholder Engagement and Sustainable Performance

IFC Performance Standard 1 emphasises:

- The integration of community participation into the project's Environmental and Social Management System (ESMS);
- The need to consult Affected Communities on risks, impacts and mitigation measures

from the earliest stages of the project;

- Establishing a free, prior and informed consultation process, tailored to the specific characteristics of the communities (language, culture, vulnerability);
- The obligation to maintain open channels of communication throughout the project lifecycle and to ensure effective access to a grievance mechanism;
- The disclosure of relevant information on the project (impacts, measures, timetable, participation mechanisms) in accessible and understandable formats 2012-ifc-performance-st....

Alignment with standards

This SEP is designed to ensure the project's compliance with all these requirements by establishing:

- A structured approach to stakeholder identification, consultation and management;
- Appropriate mechanisms for vulnerable groups;
- An iterative process of monitoring, evaluation and adaptation.

2.3. Convergences and divergences between national and international regulations

In order to assess the extent to which the Tunisian regulatory framework aligns with the requirements of international donors (EBRD, EIB, IFC), a comparative analysis was conducted on the themes of consultation, stakeholder engagement and the mechanism for managing complaints.

This analysis aims to identify points of convergence and divergence between, on the one hand, the constitutional, legal and administrative provisions in force in Tunisia, and on the other hand, the performance standards applicable to projects co-financed by international institutions. In particular, it takes into account standards specific to the protection of vulnerable groups, the handling of sensitive complaints (notably gender-based violence (GBV) and sexual abuse/exploitation (SAE)), as well as the ongoing and inclusive management of stakeholder relations throughout the project cycle.

The table below summarises this comparison by identifying, for each standard, the key requirements, the gaps identified in the Tunisian context, and the proposed corrective measures to ensure that the Gafsa and Khobna projects comply with international standards on participatory governance and grievance management.

Table 1 Similarities and differences between national and international regulations

Topic	Tunisian E&S regulations	EBRD requirement (ESR)	IFC requirement (PS)	EIB requirement (ESS)	Identified gap	Proposed corrective measures
Consultation, stakeholder engagement and complaints management mechanism	Tunisian regulations provide for public consultation as part of the public inquiry (Decree No. 2005-1991), but this remains ad hoc and limited to a specific phase of the project. There is no formal framework requiring continuous stakeholder engagement throughout the project lifecycle. Furthermore, there is no structured mechanism for managing environmental or social complaints, let alone specific provisions for handling sensitive complaints (e.g. gender-based violence – GBV, sexual exploitation and abuse – SEAH) or for protecting vulnerable people (e.g. women, young people, minorities, people with disabilities).	ESR10 requires a structured consultation process from the design phase onwards. The EBRD requires continuous, inclusive and accessible consultation with stakeholders, including vulnerable groups. It mandates the establishment of a Stakeholder Engagement Plan (SEP) and a Grievance Management Mechanism (GMM) proportionate to the project's risks. This mechanism must incorporate specific measures for handling sensitive complaints related	PS1 and PS10 require stakeholder engagement and ongoing communication. The IFC requires proactive engagement with stakeholders, based on the identification of risks and vulnerability. The complaints management mechanism must be tailored to specific risks, particularly sensitive complaints (GBV/SEAH), and allow equitable access for all groups, including marginalised populations. It	ESS10 provides for prior consultations, mechanisms for ongoing participation, transparent access to information and a complaints mechanism in line with best practice. The EIB requires the preparation of a PEPP based on a stakeholder analysis and with particular attention to vulnerable groups. The MGP must cover all E&S complaints, including those relating to gender-based violence and exploitation. It must be secure,	The Tunisian framework guarantees neither a structured engagement process nor a functional complaints mechanism throughout the project. There are no specific arrangements in place to handle sensitive complaints (GBV/SEAH) or to ensure the accessibility of the process for vulnerable groups. There is also a lack of guidelines on confidentiality, non-retaliation, and support for survivors or people in vulnerable	Develop a project-specific PEPP including a mapping of vulnerable stakeholders and an inclusive engagement strategy. Establish an appropriate, confidential, multi-channel (verbal, written, online) MGP, including specific provisions for sensitive complaints (GBV/SEAH), with referral to specialist services. Train staff, raise awareness within communities, and ensure the system is accessible to marginalised groups (language, disability, gender, etc.).

		<p>to gender-based violence (GBV/SEAH), guaranteeing confidentiality, the safety of survivors and protection from reprisals, whilst ensuring accessibility for vulnerable people.</p>	<p>must provide for confidential procedures, referral to specialist services, and case follow-up.</p>	<p>accessible, confidential, include risk management measures for vulnerable complainants and provide support for survivors.</p>	<p>situations.</p>	
--	--	---	---	--	--------------------	--

3. Identification and analysis of stakeholders

3.1. Mapping methodology

The identification and mapping of stakeholders for the Gafsa solar project were carried out using a progressive, participatory approach rooted in the local context. This took place between 6 and 10 May 2024, during which time targeted consultations and field visits to the project sites were organised.

The main stages of the process were as follows:

- Preliminary document review: a review of available documents (connection project, zoning, land registry, preliminary E&S documents) enabled an initial identification of the parties concerned. This stage facilitated the identification of institutional stakeholders, local communities and direct land users.
- Initial consultations (7–9 May 2024): several meetings were held with regional and local authorities (Governorate, Sidi Aïch Delegation, CRDA, STEG, etc.), representatives of social organisations and local communities. In total, more than 35 representatives from various stakeholder groups were met, including women, young people, heads of households, local NGOs, as well as representatives from the public and semi-public sectors.
- Site visit (6 and 8 May 2024): the solar power plant site and associated infrastructure (transmission line, access roads) were visited. Direct observations enabled the identification of farmers, grazing areas, informal settlements and community infrastructure in the vicinity of the project perimeter.
- Influence-interest ranking: each stakeholder was ranked according to their level of interest (linked to the project's positive or negative impacts on their activities) and their level of influence (ability to facilitate, delay or block the project's implementation). This analysis was used to establish an influence/interest mapping matrix useful for planning engagement activities.
- Specific identification of vulnerable groups: particular attention was paid to the situation of rural women, households without land titles, elderly people living in remote areas, as well as informal users (livestock farmers, smallholders, etc.). Discussions were held with local social structures to better understand their needs, their preferred

communication channels and their constraints regarding access to information.

3.2. List of stakeholders

The identification of stakeholders for the Gafsa solar power plant project was based on field consultations, institutional interviews, and the contextual analysis conducted in May 2025. Stakeholders were grouped into two main categories: affected parties, who are directly impacted by the project, and interested parties, who interact with the project indirectly or institutionally.

3.2.1. a) Affected stakeholders

This group comprises individuals, households and community groups who will be directly affected by the project's activities, particularly due to the proximity of the facilities, land use or changes to the local environment. These stakeholders have a high level of interest in the project and may experience positive impacts (economic opportunities) or negative impacts (loss of access, nuisances).

- **Households living near the site:** Families living in the immediate vicinity of the power station perimeter or linear infrastructure (access roads, transmission lines). They may be affected by noise or visual pollution, or experience temporary disruption during construction work.
- **Livestock farmers using grazing areas:** Nomadic or semi-sedentary livestock farmers use the land at the proposed site for grazing small ruminants. Although their presence is not officially registered, their access to the land may be restricted, which constitutes a potential loss of income.
- **Farmers:** Farmers whose plots may be affected by earthworks, the installation of power lines or access routes. Although the land belongs to the state, informal forms of farming exist.
- **Rural women:** Some women in the area, particularly female heads of households or informal agricultural workers, may be particularly vulnerable to the economic or social changes brought about by the project. Their specific concerns must be incorporated into the consultation process.
- **Local development committees:** These bodies, often active in rural areas, represent the collective interests of communities and facilitate coordination with local authorities. They can act as an interface with the project developer.
- **Youth representatives:** Young people in the area see the project as a potential source

of employment or training. They constitute a group of high interest, whose expectations may be high.

- **Informal residents:** Some people may occupy or use portions of land without formal authorisation. Their precise identification is currently underway as part of the ESIA study, particularly to anticipate any impact on livelihoods.

3.2.2. b) Interested stakeholders

This group comprises the institutions, organisations and socio-economic actors with an interest in the planning, regulation, supervision or financing of the project. Even if they are not directly affected, they often exert influence over the implementation of the project and are essential to its success.

- **Regional authorities:** The Governorate of Gafsa and the Delegation of Sidi Aïch play a strategic role in administrative coordination, project oversight and mediation with local stakeholders.
- **Local authorities:** The municipality and local councils monitor the interests of the population and are responsible for issuing certain local permits. Their support is essential for the project's social legitimacy.
- **Sectoral technical services:** The regional directorates of the CRDA (agriculture), STEG, ANME, ANPE and the environmental services (DREHAT) are involved in the planning, authorisation and environmental supervision of the project.
- **Social services:** Regional delegations responsible for social affairs, family, women's issues or youth can be mobilised to support social initiatives or facilitate the identification of vulnerable groups.
- **Civil society organisations:** Local NGOs such as SMART Gafsa, APSOE, Impact Foundation and other community associations play an active role in raising awareness, mediating and protecting vulnerable groups. They can also relay the concerns of local communities.
- **Youth and women's organisations:** These organisations (youth centres, women's clubs, local development associations) act as intermediaries to ensure the specific concerns of these groups are incorporated into the engagement process.
- **Media and local press:** They ensure the dissemination of information about the project and can influence public opinion, either positively or negatively. It is important to involve them in the communication strategy.
- **Project donors:** The EBRD, the EIB and the IFC play a role in strategic oversight, validating E&S instruments and monitoring the project's compliance with their respective requirements.

-
- **Project owner/developer:** Qair Tunisia, the project sponsor, along with its technical, environmental and contractual partners, are at the centre of the dialogue process with all other parties.

3.3. Stakeholder mapping

The influence and interest analysis enables the prioritisation of stakeholder engagement based on their influence over the project (ability to facilitate or hinder its implementation) and their level of interest (degree of involvement, impact or concern regarding the project).

This mapping, drawn up following consultations held in Gafsa in May 2024, enables engagement methods to be tailored to the specific characteristics of each stakeholder, in order to ensure an effective, inclusive and proportionate dialogue.

The results are summarised in the following table

Table 2 Stakeholder mapping

Stakeholder and PAPs	Role in the project (description + role)	Level of influence	Level of interest	Proposed engagement method
Qair Tunisia (developer)	Company responsible for the development, financing and implementation of the project. Role: responsible for all contractual, technical, environmental and social obligations.	High	High	Ongoing dialogue (weekly), direct supervision, monthly internal reporting
EBRD / EIB / IFC (lenders)	International financial institutions co-financing the project. Role: validation of E&S documents, assessment of compliance with international standards, monitoring of contractual commitments.	High	Medium	Quarterly reporting, half-yearly supervision meetings, audits
Gafsa Governorate	Regional government office. Role: to facilitate inter-institutional coordination, promote consultation and assist with the project's administrative procedures.	High	Medium	Institutional meetings, involvement in monitoring committees
Municipality of El Ksar	Local authority covering the project area. Role: local liaison, logistical coordination, participation in community information and mediation.	Medium	High	Coordination meetings, public notices, public consultation
General Forests Directorate (DGF)	National authority responsible for forest conservation. Role: assessing the project's potential impact on vegetation, dunes or wooded areas.	High	Medium	Technical meetings, authorisations, cartographic support

CRDA Gafsa	Regional branch of the Ministry of Agriculture. Role: technical support, land-use data, identification of agricultural and hydrological impacts.	Medium	High	Sectoral meetings, support for data collection
CRDA – Water and Soil Conservation (CES)	District specialising in combating erosion and hydrological risks. Role: assessment of the site’s vulnerability to flooding and erosion.	Medium	High	Technical meetings, consultation on hydrological studies
CRDA – Soil Division	District responsible for land management and agricultural land use. Role: land classification, compliance with agricultural land use designations.	Medium	High	Technical meetings, land mapping
Regional Directorate of State Property	Department responsible for land regularisation of state-owned land. Role: clarification of the legal status of plots, resolution of land disputes.	High	Medium	Land meetings, transmission of plans and KMZ files
National Heritage Institute (INP)	Institution responsible for the conservation of tangible and intangible heritage. Role: checking for the presence of heritage items, initiating procedures in the event of a chance discovery.	Medium	Medium	Official consultation, requests for records, archaeological monitoring
SNCFT Gafsa	Railway network operator. Role: approving temporary use of railway land, monitoring easement restrictions.	Medium	Medium	Technical meetings, exchange of documents, legal support
STEG	National company responsible for the electrical connection. Role: approval of the high-voltage line route, coordination technical advice on infrastructure.	High	High	Technical meetings, provision of plans, operational coordination

Local NGOs (SMART Gafsa, APSOE, Impact Foundation, etc.)	Civil society actors involved in social, environmental and local governance issues. Role: community liaisons, support for the mobilisation of vulnerable groups.	Medium	High	Quarterly community meetings, involvement in biannual awareness-raising campaigns, annual focus groups
Social services (social affairs, women, youth)	Regional offices of social ministries. Role: identifying and supporting vulnerable groups, managing sensitive situations (GBV, precariousness).	Low	High	Sectoral meetings, coordination of sensitive complaints, joint workshops
Tunisian Union of Agriculture and Fisheries (UTAP)	Professional representation of local farmers. Role: conveying the concerns of affected livestock farmers or growers, participating in land consultations.	Medium	High	Thematic meetings, member engagement, land mediation
Local residents (Douar El Ouelja, El Ksar, etc.)	Communities living in the immediate vicinity of the site. Role: affected parties who may suffer nuisance, benefit from economic spin-offs or raise social concerns.	Low	High	Quarterly community meetings, public notices, door-to-door visits, outreach via local NGOs, permanent signage

3.4. Vulnerable groups :

As part of the development of the Stakeholder Engagement Plan (SEP), identifying vulnerable groups is an essential step in ensuring equitable inclusion and effective participation of all sections of the population, including those who are often marginalised or exposed to disproportionate risks in infrastructure projects.

3.4.1. Definition

According to international standards (EBRD PR10, IFC PS1, EIB ESS10), a vulnerable group refers to any population or sub-group of a population that is likely to face barriers in accessing information, consultation or redress mechanisms, and whose livelihoods, safety or dignity could be disproportionately affected by the project.

3.4.2. Identification methodology

The identification of vulnerable groups in the Gafsa solar project is based on:

- Consultations held between 6 and 10 May 2024 with local authorities and social services
- Field visits to areas directly affected by the power plant and linear infrastructure;
- A preliminary socio-economic analysis of the local context (precarious living conditions, access to services, dependence on agriculture or pastoralism).

Vulnerable group	Justification	Potential risks associated with the project	Measures for integration into the PEPP
Rural women	Limited access to information and employment; heavy reliance on the informal economy	Exclusion from the consultation process; loss of local resources or opportunities; excessive responsibilities	Dedicated focus groups; involvement of women's associations; mobilisation of local representatives (women leaders)
Isolated older people	Dependence on family; limited mobility; social isolation	Difficulty accessing information; not taken into account in impacts or compensation	Home visits; mediation by local authorities and neighbourhood committees
Households without land titles	Presence of informal occupants on land; lack of legal recognition	Exclusion from compensation measures; land insecurity; legal vulnerability	Prior registration; application of donors' standards (compensation and support even without legal title)
Pastoralists	Nomadic or semi-nomadic users dependent on grazing	Loss of access to land; reduction in traditional grazing routes	Specific dialogue on land use; proposals for alternatives or pastoral compensation
Unemployed young people	High unemployment rate in the region; high	Frustration if local employment opportunities	Targeted information sessions; integration into local

	expectations regarding the project	are not accessible; risk of social tensions	recruitment schemes; collaboration with youth centres
People with disabilities	Difficulties with physical and informational access; social marginalisation	Exclusion from project activities; communication barriers	Accessibility of information formats; use of adapted channels; involvement of social services

3.4.3. Recommended approach

The Gafsa project's SEP incorporates a differentiated approach for these groups, based on:

- Communication tailored to the constraints of each group (language, mobility, accessibility);
- Specific and confidential consultations, particularly for women, informal households or people affected by sensitive risks;
- A gender-sensitive and confidential complaints management mechanism;
- Coordination with local social services and NGOs to facilitate the identification, mediation and referral of vulnerable groups.

4. Summary of previous consultations

4.1. Consultation activities already carried out

As part of the preparation of the Stakeholder Engagement Plan (SEP) for the Gafsa solar power plant project, a number of consultation activities were already carried out during the scoping phase of the Environmental and Social Impact Assessment (ESIA). These activities laid the foundations for this SEP, enabling the collection of essential information and the establishment of a structured dialogue with institutional and local stakeholders.

These consultations have contributed to:

- Identify the main environmental, social and land-related issues of the project;
- Informing stakeholders about the project and the ongoing assessment processes;
- Initiate a process of continuous and progressive participation;
- Gathering useful input for the development of the SEP and the design of the future engagement strategy.

The summary below outlines the various methodological steps adopted and the results of the consultations carried out between April and May 2025.

4.1.1. Methodological approach

The methodology adopted for the initial consultation phase was based on a combination of desk research, field observations and targeted meetings with stakeholders. The aim was to build a reliable database to inform technical, environmental and social decisions, whilst initiating a structured dialogue around the project.

The main steps were as follows:

- **Documentary analysis:** The team conducted an in-depth review of the available documents (preliminary study, hazard assessment, hydrological study, initial site plans) to identify the technical, physical and regulatory constraints of the site.
- **Field visit (16 April 2025):** An initial visit was carried out with local authorities (delegate, Omda, members of the regional council), enabling the team to directly observe sensitive issues: grazing practices, informal use of agricultural land, irrigation wells, the presence of nearby educational infrastructure, disused railway lines, and the immediate proximity of the Bayech wadi.
- **Targeted institutional consultations:** Meetings were held with the main relevant in s (Governorate, CRDA, Forestry Department, State Land Agency, INP, SNCFT, etc.), aimed at presenting the project, clarifying regulatory requirements, discussing land and

environmental issues, and collecting additional data (maps, land tenure records, heritage listings).

- **Coordination meetings with Qair:** Regular exchanges took place with the developer's team, including fortnightly debriefing meetings, enabling consultation priorities to be adjusted and technical choices to be validated as the studies progressed.
- **Conducting a further site visit:** Following findings from the initial visit (route modification, land constraints), a supplementary site visit was planned and carried out to refine the impact analysis and meet with parties potentially affected by the project's new components.
- **Coordination with the biodiversity team:** Joint work is also underway with biodiversity experts to ensure consistency between the results of ecological surveys and social mapping, particularly regarding land use and ecosystems.

4.1.2. Consultations with stakeholders

Formal consultations have been held with institutional and local stakeholders to ensure a shared understanding of the project and to gather perceptions, expectations and concerns regarding its implementation. These meetings have notably enabled us to:

- Present the technical characteristics and objectives of the project;
- Clarify the ESIA and CPR processes led by ASF Consulting;
- Identify risks, land tenure constraints, heritage aspects and local sensitivities;
- Discuss potential synergies and expectations regarding employment and local benefits.

Key consultations included:

- **El Ksar Delegation:** engagement with local authorities and a joint site visit;
- **Gafsa Governorate:** meeting chaired by the Secretary General attended by several regional departments (health, heritage, land, GCT, etc.);
- **CRDA (Water and Soil Conservation, Forestry and Land Directorate):** discussion on environmental, hydrological and land protection issues;
- **Regional Directorate of State Land:** clarification of land tenure status and identification of tribal disputes over the communal lands traversed;
- **INP (Gafsa):** discussion on archaeological heritage and initiation of procedures with head office to access records;
- **SNCFT:** analysis of the occupation of railway land and compensation arrangements.

These consultations have enriched the initial assessment, laid the foundations for solid institutional collaboration, and prepared the ground for subsequent stages of information, participation and complaint management, in accordance with the requirements of the EBRD,

the IFC and the EIB

Table3 : Register of consultations carried out

Date	Meeting	Stakeholders consulted	Main points discussed	Action points
17/04/2025	Meeting at the El Ksar delegation	UTAP, El Ksar Municipality, El Ksar Delegate, Regional Council	Presentation of ASF Consulting's role, objectives of the ESIA and the CPR, importance of the site visit, commitment to collaboration	Carry out the visit, maintain regular dialogue with local representatives
17/04/2025	Meeting in the Governorate of Gafsa	Governorate, El Ksar and Mdhila delegations, CRDA, Regional Development Office, El Ksar Municipality, INP, GCT, public health, regional council, UTAP, ANDE	Land tenure, flood risks, heritage, cumulative impacts, worker access, CSR, coordination with STEG	Targeted discussions with the relevant bodies, collection of additional data, incorporation of the high-voltage route into the studies
18/04/2025	Meeting with the CES (CRDA)	District Head, CES Gafsa technicians, Ksar-Mdhila region, Regional Council	Low hydrological risk, no pollution from ONAS, need for a recent hydrological study, historical gabions not documented	Obtain an updated hydrological study and archival documentation following the 1990 flood
18/04/2025	Meeting with the Forestry Department (CRDA)	Regional Director of Forests, member of the Regional Council	Project presentation and site approval. No objections to the site	Formalisation of the no-objection agreement and monitoring in the event of changes to the route
18/04/2025	Meeting with the Land Department (CRDA)	District Head, member of the regional council	Agricultural status of the 4th plot not finalised, overhead line constraints and proximity to wadis, outdated cartographic data to be used	Send an official request, update the agricultural map, verify compliance of the high-voltage power line route
18/04/2025	Meeting at the State Estate – Gafsa	Regional Estate Directorate, surveyor	Land status of plots, communal land, tribal conflicts, high-voltage line easement	Analyse the files (KMZ, maps), prepare an updated land map, support the regularisation process
18/04/2025	Meeting at the INP Gafsa	Regional Heritage Officer	Verification of archaeological sites, data confidentiality, need	Request records from Tunis, incorporate recommendations into the Heritage Management

			for an official request	Plan
18/04/2025	Meeting with the SNCFT	Civil Engineer, SNCFT Gafsa	Temporary occupation of railway land, proposed costs, documentation provided (laws, reference points, KMZ)	Verify compliance of the temporary occupation, incorporate railway constraints into the final alignment

4.2. Further consultations and coordination underway

To ensure a full understanding of the project's challenges and inclusive participation, further consultations are planned with stakeholders not yet met. These actions will address any gaps identified during the first phase and ensure the gradual buy-in of the relevant stakeholders.

- **Institutional and regional monitoring:**

Following the meeting held at the Gafsa governorate, several targeted visits were carried out to technical institutions (CRDA, State Property Office, INP, SNCFT), enabling the collection of cartographic, land, heritage and environmental data. These exchanges provided a better understanding of local constraints, territorial dynamics and potential risks linked to land use, wadi management or land disputes on communal lands.

This work will continue in the coming weeks through thematic consultations with sector-specific technical institutions, particularly on biodiversity, connecting infrastructure and social issues.

- **Follow-up meetings with Qair:**

Bi-weekly meetings have been established between ASF Consulting and the Qair team. The aim of these meetings is to share findings from field visits, validate technical assumptions and adjust the study schedule in line with donor requirements. They play a key role in strategically aligning the SEP with other ESIA deliverables, notably the Resettlement Action Plan (RAP) and the risk analysis.

- **Coordination with donors:**

In parallel, discussions with the financial institutions funding the project (EBRD, IFC, EIB) are planned to validate the consultation process's compliance with international requirements. A joint meeting between Qair, ASF Consulting and the donors is being considered to present the preliminary results, discuss specific expectations regarding stakeholder engagement, and align the next steps of the PEPP with the overall project timeline.

4.3. Results of the E&S document feedback meeting – Sidi Bouzid

4.3.1. Introduction

As part of the finalisation of the environmental and social documents for the Gafsa photovoltaic power plant project, a feedback meeting was organised at the Gafsa Governorate on 20 November 2025. The aim of this consultation was to present the results of the Environmental and Social Impact Assessment (ESIA), the Land Acquisition and Resettlement Framework (LARF), the Stakeholder Engagement Plan (SEP) and other technical analyses carried out by ASF Consulting, as well as to gather feedback from regional institutions and local representatives.

The meeting brought together the key stakeholders involved in the project: regional authorities, technical departments, representatives from ministries, local organisations, as well as teams from Qair and ASF Consulting. The discussions confirmed a good overall understanding of the project, highlighted the main expectations of stakeholders, and identified areas requiring enhanced coordination prior to the construction phase.

4.3.2. Key outcomes of the feedback session :

- **Presentation of the project and overview of objectives:**

The session began with a review of the project, its technical aspects, the agenda and the objectives of the meeting. The main findings of the environmental and social assessment, as well as the planned measures and commitments relating to the project's implementation, were presented

- **Construction schedule and remaining stages:**

The provisional implementation schedule was reviewed, with work scheduled to start in the first quarter of 2026, and the administrative procedures still underway (financing, planning permission, submission to the Higher Council for Administrative).

- **Site access, transport and logistics**

Questions were raised regarding the arrangements for transporting workers and the condition of the tracks leading to the site. It was confirmed that these tracks already exist and that improvements are planned. A request for asphaltting was also made.

- **Railway land and SNCFT right of way**

Issues relating to the right of way across railway land were discussed, in particular the amount of the right-of-way fee and the ongoing authorisation procedures. A difference of opinion was expressed regarding the financial estimate associated with this easement.

- **Fencing and general site layout**

The need to fully fence off the power station was reiterated, in accordance with the project's safety requirements.

- **Authorisations:**

The authorities expressed their willingness to assist with all technical and administrative procedures in order to speed up the process and avoid delays in the project's implementation.

- **Role and support of local authorities**

Institutional representatives indicated that procedures would be streamlined and that municipal constraints would need to be taken into account in accordance with current regulations.

- **Environmental issues and sector-specific technical aspects**

Questions were raised regarding the water source, landscaping and planting. It was confirmed

that these elements are included in the planning application.

- **Working framework and subcontracting**

Issues relating to subcontracting and the registration of workers were reiterated, with the point being made that these obligations applicable to the companies involved will be included in their contracts.

- **Local acceptance and community expectations**

Positive feedback was received regarding acceptance of the project. Community suggestions were put forward, notably the connection of the El Waha primary school.

Expectations regarding local benefits and corporate social responsibility initiatives were highlighted, including ideas such as:

- infrastructure upgrades,
- local micro-projects,
- support for schools,
- public lighting initiatives.

- **Local employment and recruitment**

It has been stated that employment agencies will handle local recruitment for the construction phase.

4.4. Consultation Plan

The consultation process under the SEP is based on institutional meetings, community dialogues and targeted activities aimed at ensuring the effective involvement of stakeholders at all stages of the project. The aim is to ensure that the concerns, expectations and proposals of local communities, vulnerable groups and authorities are taken into account in the implementation of the project, particularly with regard to social and environmental impacts. These consultations also help to identify relevant community representatives, enhance transparency and lay the foundations for ongoing dialogue

Table4Consultation Plan

Project phase	Consultation objectives	Proposed methods	Location / Timetable	Target stakeholders	Responsibilities
Design phase	Institutional framework, identification of expectations	Institutional meetings (governorate, CRDA, delegation), monthly meetings, kick-off workshops	Gafsa / El Ksar – March–April 2025	Regional authorities, technical departments, civil society	ASF Consulting & Qair
Design phase	Early community engagement	Targeted feedback meetings (3–4 regional sessions), dissemination of summaries via printed materials and the website – frequency: ad hoc, at each study milestone	Gafsa and neighbouring municipalities – April–May 2025	Local population, community leaders, local NGOs	ASF Consulting & community liaisons

-design phase	Presentation of preliminary findings from the ESIA and the PEPP	Targeted feedback sessions with institutions and local NGOs	Gafsa / Mdhila / El Ksar – May–June 2025	Technical services, NGOs, local authorities	ASF Consulting (EIES/CPR/PEPP) & EAM
Design phase / Pre-construction	Raise awareness and inform local communities about land use restrictions within the project corridors (power station, power line, access), in accordance with the requirements of the SEP, CATR/LRP and EIES	Participatory community meetings, information sessions in the local dialect, posters and visual materials in municipalities and at transit points, dissemination via local radio stations and social media	Gafsa / El Ksar / Neighbouring municipalities – (prior to the start of works)	Livestock farmers, farmers, land users, community representatives, CRDA, local NGOs (SMART Gafsa, APSOE)	Qair with support from CRDA and local authorities
Before work begins	Targeted consultation with vulnerable groups	Neighbourhood meetings, engagement with community leaders, sessions in local dialects – initially on a regular basis, then annually	Riverside villages – TBD	Women, older people, GDA, young people	Qair & local authorities
Construction phase	Social monitoring and grievance management; measurement of perceived impacts	Regular community meetings (quarterly), focus groups, engagement of community leaders	Areas near the construction site – TBD	Affected population, local NGOs, neighbourhood committees	Qair & construction companies, ASF support
Construction phase	Discussions regarding job opportunities, management of local tensions	Participatory meetings, awareness-raising, coordination with local organisations	Neighbouring municipalities – TBD	Young people, unemployed people, local councillors	Qair & construction companies

Operational phase	Post-construction E&S monitoring, of community feedback	Community meetings, feedback sessions, regular consultation sessions	Gafsa / neighbouring municipalities – TBD	Community representatives, technical services	Qair with ad hoc support from E&S consultants
--------------------------	---	--	---	---	---

5. Stakeholder engagement strategy and disclosure of information

5.1. Specific objectives of engagement:

The main objective of the stakeholder engagement and information disclosure strategy is to ensure clear, transparent, inclusive and ongoing communication with all stakeholders affected by the Gafsa solar photovoltaic power plant project throughout its lifecycle (preparation, construction, operation, and eventual decommissioning).

It is part of an approach to participatory governance and proactive management of environmental and social impacts. As such, the following specific objectives have been defined:

- **Ensuring equitable access to information:**
To provide all stakeholders with information that is understandable, relevant, up-to-date and available in a suitable format (local language, paper or oral depending on the target audience), particularly for vulnerable groups and populations with low literacy levels.
- **Promote active and inclusive participation:**
Create a structured space for dialogue with stakeholders, ensuring that affected communities—including women, young people, herders, households without land titles and people with disabilities—can express their concerns, expectations and recommendations.
- **Strengthen the project's transparency and accountability:**
Report regularly on the project's progress, decisions taken, impacts identified and mitigation measures implemented, notably through monitoring reports, information meetings and accessible communication tools.
- **Identify and address concerns or complaints promptly:**
Establish a functional, confidential complaints management mechanism that is sensitive to the needs of vulnerable groups, particularly regarding gender-related complaints (GBV/SEAH), in order to address concerns raised by communities promptly and prevent conflicts from escalating.
- **Promote local ownership of the project:**
Encourage community buy-in to the project by strengthening their understanding of the expected benefits, economic and social impacts, and opportunities for direct participation (jobs, local subcontracting, co-design of mitigation measures).

- **Support informed decision-making:**

Ensure that local authorities, community organisations and donors have the necessary information to assess, approve and support the project with a view to sustainability and compliance.

- **Adapt the approach to the different phases of the project:**

Tailor engagement activities to the project phase (preparation, construction, operation), anticipating the specific needs at each stage (pre-construction consultation, site communication, post-implementation monitoring, etc.).

5.2. Documents to be published

The following documents will be made available to stakeholders throughout the project lifecycle:

- The Environmental and Social Impact Assessment (ESIA);
- The Stakeholder Engagement Plan (SEP);
- The Resettlement Policy Framework (RPF);
- The non-technical summary of the ESIA;
- The environmental and social monitoring reports.

5.3. Languages of publication

- **French:** the official language for the preparation and submission of documents to institutions.
- **Dialectal Arabic (Tunisian Darija):** the language used for public consultations, public information materials and oral community discussions.

5.4. Distribution channels

- **Community radio stations:** Advertisements on *Radio Gafsa* in the local Arabic dialect.
- **Public displays:** Town halls, health centres, schools, mosques, markets.
- **Digital platforms:**
 - Qair website (www.qair.energy);
 - Social media (local Facebook pages, community WhatsApp groups).
- **Print materials:** Physical copies made available at consultation points.

5.5. Methods of informing the public about availability

- Posters in busy public places (town halls, souks, health centres);
- Radio adverts broadcast during peak listening times;
- Targeted text messages sent to local authorities, GDA and community representatives;
- Official memos to technical departments and local authorities;
- Information meetings with distribution of visual materials

5.6. Information dissemination plan

As part of the Gafsa solar project, information dissemination aims to provide clear, regular and accessible information to all relevant stakeholders at every stage of the project. It ensures transparency, supports local buy-in and promotes informed participation, particularly among vulnerable groups. The communication channels, content disseminated and responsible parties are tailored to the local context, taking into account linguistic, social and institutional realities.

The table below sets out the key information to be communicated, the methods envisaged, the target audiences, the provisional timetable and the responsibilities.

Table5 Information dissemination plan

Project phase	Information to be communicated	Proposed dissemination channels	Location / Timetable	Target stakeholders	Responsibilities
Design phase	Project schedule, regulatory framework, initial impacts	Radio Gafsa, inserts in <i>La Presse</i> , posters in town halls/schools, digital distribution	Gafsa and neighbouring municipalities – April–May 2025	Local population, community leaders, local media	Qair with support from ASF Consulting
Before work commences	Distribution of final documents (ESIA, SEP, CPR, non-technical summary)	Qair website, physical copies deposited at the town hall and health centre, sent to the authorities	Gafsa / El Ksar – August–September 2025	All stakeholders	Qair
Construction phase	Project monitoring, mitigation measures, potential incidents	Community meetings, quarterly updates, public notices, website updates	Areas near the construction site – TBD	Affected population, local leaders, local authorities	Qair & contractors
Construction phase	Job vacancies, recruitment process	Posters in the town hall, radio adverts, engagement with local organisations	Neighbouring municipalities – TBD	Young people, unemployed people, job seekers	Qair & construction companies

Operational phase	E&S monitoring of the project, community feedback	Regular meetings, community liaison, communication with local authorities	Gafsa / neighbouring municipalities – TBD	Community representatives, technical services, civil society	Qair with ad hoc support from E&S consultants
-------------------	---	---	---	--	---

6. Grievance Management Mechanism (GM)

6.1. Introduction and objectives

As part of the Gafsa solar photovoltaic power plant project, a grievance mechanism (GM) is being established to enable stakeholders, including local communities, workers, authorities and other affected parties, to raise complaints, concerns or requests for information and to receive appropriate, timely and transparent responses.

This mechanism serves as a preventive and participatory tool for managing social and environmental risks, ensuring active listening and constructive dialogue regarding the project.

The objectives of the GCM are as follows:

- To provide a clear, accessible and confidential channel for receiving and handling complaints;
- Prevent conflicts and promote their swift and fair resolution;
- Improve the project's accountability to local stakeholders;
- Meet the requirements of donors (EBRD, EIB, IFC) and Tunisian regulations;
- Contribute to maintaining a climate of trust between Qair, its partners and the communities.

6.2. Types of complaints handled

The MGP covers a wide range of potential grievances, including:

- **Environmental:** noise pollution, dust, pollution, damage to biodiversity;
- **Land and social issues:** property disputes, site access, informal settlements, tribal disputes;
- **Working conditions:** non-payment of wages, safety conditions, discrimination, failure to respect workers' rights;
- **Indirect impacts:** heavy vehicle traffic, damage to roads, nuisance to local residents;
- **Inappropriate behaviour:** abuse of power, harassment, disrespectful conduct by staff;
- **Lack of information or inclusion:** failure to consult, poor communication, exclusion of vulnerable groups.

The mechanism handles individual or collective complaints, whether anonymous or identified, whilst ensuring confidentiality and impartiality.

6.3. Operating principles of the GM

The GM is based on the following principles :

- Accessibility: free of charge, simple, linguistically and socio-culturally adapted;
- Transparency: a well-known process, publicised via posters, meetings and radio;
- Confidentiality: discreet handling, respect for anonymity upon request;
- No reprisals: protection of complainants' right to freedom of expression;
- Efficiency: prompt response, defined deadlines at each stage;
- Fairness: impartial handling, consideration of vulnerable groups;
- Traceability: systematic recording in a dedicated register;
- Continuous improvement: regular evaluations and adjustments to the mechanism

6.4. Complaints handling process

Step 1: Receipt of complaints:

The project establishes a flexible and accessible system for receiving complaints, taking into account local realities, literacy levels, social practices and the diversity of stakeholders. This step is essential to ensure that all those concerned, including vulnerable groups, can freely express their concerns.

Complaints may be received through the following channels:

a) Community mechanisms on the ground

- **Community liaisons** (e.g. Omda, members of local associations or recognised community leaders) trained to collect grievances, record them and pass them on to the E&S team;
- **Local NGO partners** involved in the social or environmental monitoring of the project, with a direct link to the affected populations or communities;

b) Direct channels within the project

- **CLO (Community Liaison Officer):** this is the **designated focal point** for the MGP, who can be contacted in the field or at the project's local office. They keep a log of complaints received verbally or by telephone;
- **Complaints boxes:** located in the Ksar and Mdhila district offices, as well as in the affected areas (notably Aguela), in accessible public places (town hall, school, health centre, etc.);
- **Community meetings:** during awareness-raising workshops or consultations, a specific session is dedicated to the expression of grievances (with assistance in formulating them if necessary);

c) Remote channels

- **Telephone and SMS:** a dedicated number will be provided to all stakeholders during

upcoming awareness-raising activities;

- Dedicated **email address** for managing project complaints;
- **Online form** (if available), to be completed via the project website or the Qair digital platform.

d) Alternative channels

- **Complaints addressed directly to the donors** (EBRD, EIB, IFC) through their independent mechanisms (IPAM, CAO, Complaints Mechanism), for those wishing to voice their concerns outside the project system;
- **Official letters** sent via the delegations, the municipality or the governorate.

All complaints, whether verbal or written, anonymous or named, are admissible. A simplified form will be used by the CLO to record any complaint received verbally, whether or not the complainant is present. Each recorded complaint triggers the formal processing procedure.

Step 2: Recording complaints

Once received, each complaint is immediately recorded in the complaints management register maintained by the project's E&S team, under the coordination of the Community Liaison Officer (CLO). This register serves as the central tool for tracking, managing and analysing complaints.

Each complaint, whether verbal, written or submitted via a digital or community channel, is recorded on an individual complaint form, completed by the CLO or by the person who received the complaint. The form includes at least the following details:

- **Unique reference number** of the complaint (chronological coding by sector/delegation);
- **Date of receipt**;
- **Channel of transmission** (complaints box, meeting, telephone, NGO, CLO, email, SMS, etc.);
- **Surname and first name of the complainant**, or the word "anonymous" if the person wishes to remain anonymous;
- **Contact details** (telephone number, address or contact person) if provided voluntarily;
- **Location of the complaint** (sector, branch);
- **Category of complaint** (environment, health, safety, community relations, nuisance, access, etc.);
- **Clear summary of the grievance raised.**

All complaints are recorded in the centralised GM register, in both paper and digital formats (Excel file or secure database).

The register is updated weekly by the CLO and reviewed by the project's E&S Manager at least once a month to analyse trends or escalate sensitive cases.

An anonymised version of the register may be provided to donors during monitoring visits, upon request.

Step 3: Acknowledgement of receipt

Once the complaint has been recorded, a formal acknowledgement of receipt is issued to the complainant by the GM focal point (the CLO) or via any other channel used by the complainant.

The purpose of this acknowledgement of receipt is to:

- Confirm that the complaint has been duly noted;
- Inform the complainant of the reference number assigned to their complaint;
- Outline the next steps in the process;
- Indicate an estimated response time, generally within a maximum of 30 working days;
- Provide the contact details of the contact person (usually the CLO) who will be handling the case.
- Methods of submission:
 - If the complaint was made verbally: immediate verbal acknowledgement of receipt is given, followed by a simplified written version as soon as possible (delivered in person or via the community liaison officer);
 - If the complaint was submitted in writing or electronically: a signed written acknowledgement is handed over or sent by text message, email or post.

In the case of an anonymous complaint, a general acknowledgement of receipt may be displayed publicly (in the relevant offices or on the project's website), without identifying the individual.

The project undertakes to ensure the availability and linguistic accessibility of the acknowledgement of receipt (in Arabic or the local dialect if necessary) to enable understanding by all categories of complainants, including vulnerable people or those with low literacy levels.

Step 4: Assessment of the complaint

Once the complaint has been received and registered, the project's E&S team, under the coordination of the Community Liaison Officer (CLO), assesses it to identify the necessary actions and the appropriate level of handling.

The assessment aims to:

- Gain a clear understanding of the nature of the grievance, its origins and its potential impact;

- Verify the facts and ensure the complaint complies with the project's commitments and environmental and social requirements;
- Classify the complaint according to its level of complexity, urgency or severity;
- Determine whether it is an individual or collective grievance, and whether it concerns vulnerable parties, which requires special attention.
- Two levels of handling are then distinguished:

a) Simple / Level 1 complaints

These are complaints that are:

- Easy to verify or resolve;
- Do not require complex technical verification or the involvement of multiple stakeholders.

These complaints are handled directly by the CLO with the support of the E&S Manager, within a short timeframe.

b) Complex complaints / Level 2

These are complaints:

- Involving several parties or having a collective impact;
- Requiring a field investigation, further consultations or arbitration;
- Concerning cases of potential non-compliance with donors' requirements or land rights.

These complaints are subject to an in-depth analysis, including:

- A field investigation if necessary;
- A review of documentation (maps, inventories, minutes, contractual commitments, etc.);
- Consultation with the parties involved (complainant, local representatives, NGOs, etc.);
- If required, the convening of a Local Complaints Management Committee, comprising:
 - The project's E&S team (including the CLO),
 - A representative of the delegation or governorate,
 - A representative of the developer (Qair),
 - A representative of the donors or an external observer, if necessary.

This assessment must be completed within a reasonable timeframe not exceeding 15 working days from the date the complaint is recorded, to enable a prompt response.

Step 4a: Attempt at amicable resolution (preferred route)

Before any formal appeal or arbitration proceedings are initiated, an attempt at amicable settlement is systematically considered. This stage aims to resolve grievances in a consensual, swift and fair manner, particularly those relating to land occupation, compensation

or social interference.

This approach is preferred as it allows for:

- A response tailored to local and cultural specificities;
- A reduction in tensions;
- Smoother implementation of the project by limiting legal proceedings.
- Procedures for amicable resolution:
- A meeting is proposed between the complainant, the CLO (GM focal point) and the E&S Manager, at a neutral venue or at the project's local office;
- The proposed solution may take the form of:
 - Appropriate financial or material compensation;
 - A written commitment to amend or strengthen a social or technical measure;
 - Logistical support or specific assistance;
- The amicable solution is formalised in signed minutes (or recorded orally if the complainant does not wish to sign), with a clear statement of the agreement;
- If the complainant accepts the solution, the complaint is closed and recorded as having been resolved amicably;
- If the complainant refuses or disputes the solution, the complaint proceeds to the next stage of the formal process (arbitration, local appeal or appeal to the funders).

This mediation approach is a strategic option that is encouraged in projects involving land issues, resettlement or sensitive social impacts.

Step 5: Response and resolution

Following an assessment of the complaint, a formal response is drafted by the project's E&S team, coordinated by the CLO, in consultation with the parties concerned. This response aims to:

- Propose a solution appropriate to the nature of the grievance;
- Clarify possible corrective actions and implementation timelines;
- Confirm the developer's commitment to handling the complaint fairly and in a transparent manner;
- Processing time:
- An official response is provided within a maximum of 30 working days from the date the complaint is registered;
- In exceptional circumstances requiring a longer timeframe (external expert assessment, mediation, complex investigations), the complainant will be informed in writing of the reason for the delay and the new estimated timeframe.

Content of the response:

- Reference to the complaint number;
- Summary of the complaint and the checks carried out;
- Description of the proposed corrective measures (technical, social, administrative, etc.);
- Identification of the person or department responsible for their implementation;
- Implementation deadline and monitoring procedure.

Resolution methods:

- **Direct handling** by the project team or the developer (Qair), if the complaint is straightforward;
- **Dialogue or local mediation** facilitated by the CLO or the Local Complaints Management Committee (if complex or sensitive);
- **External arbitration** or support from a local or customary authority, if the dispute persists;
- **Recourse to the donors' mechanism**, if requested by the complainant.
- **Confirmation by the complainant:**

Once a solution has been proposed, the complainant is invited to give their consent (verbally or in writing). If the solution is accepted, the complaint is considered resolved. If not, the review or appeal process is initiated.

Step 6: Closing the complaint

Once the complaint has been resolved, a formal closure process is implemented to ensure traceability and confirm the complainant's satisfaction (or otherwise).

Closure steps:

- **Closure form:** a form is completed by the CLO for each complaint, containing:
 - A summary of the complaint;
 - The actions taken;
 - The date of resolution;
 - The complainant's agreement or disagreement;
 - Any recommendations for preventing similar complaints.
- **Confirmation by the complainant:**
 - If the solution has been accepted, the complainant signs (or confirms verbally, if illiterate) the closure form;
 - If the solution is rejected, the form clearly states this, and the case is referred back to mediation or marked as unresolved, pending an appeal or a reassessment.
- **Archiving:**

- All closed complaints are archived in the GM register (paper + secure electronic version);
- The forms are filed by delegation and by complaint category for further analysis.
- **Enhanced follow-up:**
 - Complaints concerning vulnerable individuals, sensitive cases or those involving recurring risks are subject to post-resolution monitoring for a specified period (minimum 3 months);
 - Field visits may be organised by the CLO or the E&S Manager to ensure that solutions are effectively implemented.

Table 6 Timelines for the MGP stages

Stage of the mechanism	Recommended timeframe
Receipt	Complaints may be submitted at any time
Registration	Within 5 working days of receipt
Acknowledgement of receipt	Within 7 working days of registration
Assessment	Completed within 10 to 15 working days
Out-of-court settlement (preferred)	To be initiated as soon as the assessment is complete, to be finalised within 10 working days (included within the 30 days)
Formal response and resolution	Within a maximum of 30 working days after registration
Closure and archiving	Within 7 working days of acceptance or closure
Post-resolution follow-up (if applicable)	For a minimum period of 3 months for sensitive cases

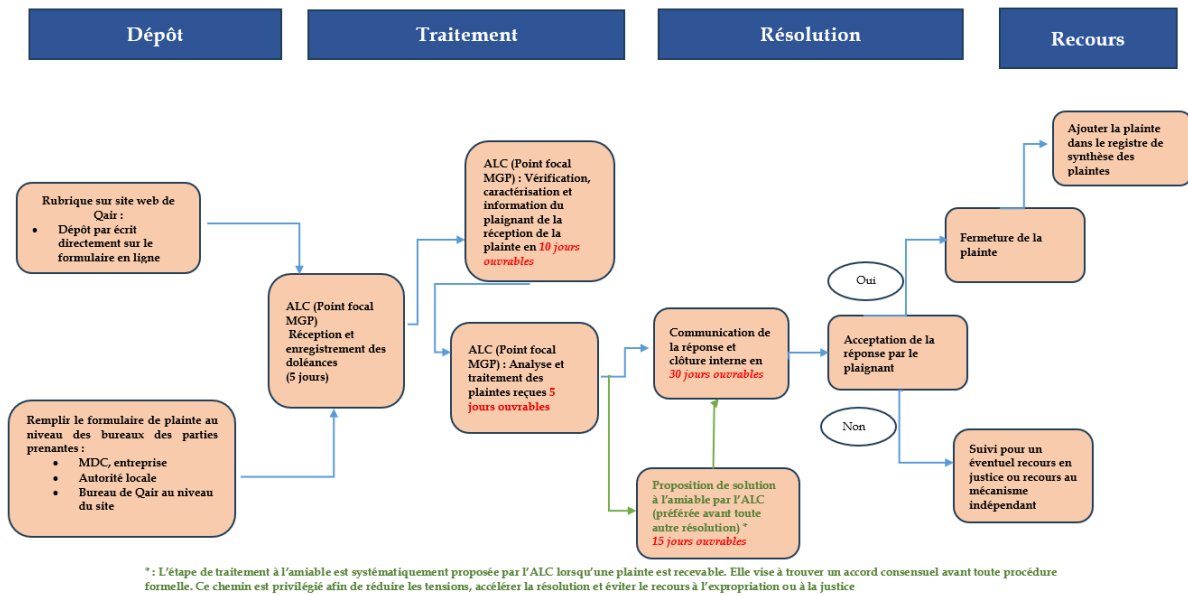


Figure 1 Complaints Management Process

6.5. Monitoring, evaluation and reporting of complaints

The complaints management system is based on a centralised electronic register, regularly updated by the Community Liaison Officer (CLO) and supervised by the project's E&S Manager. This register is a key tool for ensuring:

- Rigorous monitoring of processing times, the traceability of actions taken and the closure of complaints;
- The retention of supporting documents (complaint forms, mediation reports, closure forms, etc.);
- The automatic generation of statistics and performance indicators for management, trend analysis and continuous improvement.
- The main monitoring indicators include:
 - The number of complaints received by department, channel or type;
 - The resolution rate within the set deadlines;
 - The average time taken to process complaints;
 - The satisfaction rate reported by complainants;
 - The identification of recurring or unresolved complaints.
- Periodic assessment:
 - A half-yearly evaluation of the mechanism will be carried out by the E&S team;
 - Qualitative reviews will be carried out to identify areas for improvement in the system (accessibility, effectiveness, clarity of procedures);

- The results will be incorporated into:
 - Environmental and social monitoring reports submitted to donors and authorities;
 - Meetings with stakeholders, particularly at the level of the relevant delegations (Mdhilla and Ksar);
 - Internal project performance reviews and periodic reports to Qair.

6.6. Commitment of the developer

Qair, as the developer of the Gafsa solar power plant project, reaffirms its firm commitment to implementing a rigorous, ethical Grievance Mechanism (GM) that complies with international standards.

Specifically, Qair undertakes to:

- Deploy an operational GM that is accessible to all stakeholders, including vulnerable people and those with low literacy levels;
- Train project staff, in particular the Community Liaison Officer (CLO), on procedures for receiving, recording, processing and following up on complaints;
- Raise awareness among local communities about the existence of the mechanism, its objectives, access channels and how it operates, using appropriate materials (posters, meetings, radio spots, etc.);
- Handle each complaint seriously, impartially and confidentially, whilst adhering to the stated deadlines;
- Document the entire process in a transparent and secure manner, without compromising the privacy or identity of the complainant;
- Regularly review and improve the GM based on feedback from the field and half-yearly evaluations;
- Mobilise the necessary human, technical and financial resources to ensure its smooth operation, including during the construction phase.

The GM thus constitutes a strategic tool for risk management, strengthening ties with local communities, and consolidating the project's social acceptability in the Gafsa region.

6.7. Specific mechanism for managing complaints related to gender-based violence (GBV)

As part of the Gafsa solar power plant project, Qair recognises that certain risks of gender-based violence (GBV), including sexual harassment, sexual exploitation or sexual abuse (SEA/HS), may arise during the various phases of the project, particularly during construction. These risks may affect members of the community, particularly women and girls, but also female construction workers or local contractors.

In accordance with the requirements of the lenders (EBRD, IFC, EIB), a GBV Complaints Management Mechanism has been established, integrated into the project's general Complaints Management Policy, but with specific provisions ensuring confidentiality, sensitivity, and rapid referral to specialist services.

6.7.1. Specific objectives of the GBV-GMM

- To enable victims or witnesses to report cases of GBV confidentially, safely and without stigma;
- To clearly separate the handling of GBV complaints from other types of complaints, by providing a dedicated channel;
- To guarantee a rapid and appropriate response, respecting the privacy and protection needs of those affected;
- Refer survivors to specialist service providers (health, psychosocial support, legal assistance) in coordination with local organisations.

6.7.2. Key principles

- Informed consent and absolute confidentiality;
- No reprisals against victims or complainants;
- Neutrality and active listening by reporting channels;
- Referral to locally identified specialist service providers (NGOs, hospitals, support centres);
- Specific training for project staff, particularly the CLO, in handling this type of complaint.

6.7.3. Procedures for receiving and processing complaints

GBV complaints can be received via:

- The Community Liaison Officer (CLO), trained in confidentiality and the sensitive handling of complaints;
- Identified trusted community representatives (local women leaders, social NGOs);
- Secure complaint boxes specifically marked 'Confidential – GBV';

- A dedicated telephone number or confidential SMS channel (TBD);
- In coordination with health or social services in the governorate of Gafsa.

6.7.4. Handling and referral

- No local investigations will be conducted directly by project staff. The project team's role is limited to:
 - Acknowledging receipt discreetly;
 - Informing the survivor of their options;
 - Facilitating access to specialist service providers;
 - Documenting the report without any personally identifiable information.
- List of service providers in Gafsa: to be finalised with the Regional Social Affairs Delegation, hospitals, local support groups, and partner NGOs

6.7.5. Follow-up and documentation

- A separate confidential register is kept for VBG complaints, without any reference to personal identity;
- The data is used solely for risk monitoring (number, type, trends) and updating prevention measures;
- No personal information is disclosed to Qair, the authorities or donors without the victim's prior written consent.

6.7.6. Developer's commitment

Qair undertakes to:

- Raise awareness among project staff and subcontractors regarding the prevention of GBV;
- Include contractual clauses stipulating zero tolerance towards harassment or abuse;
- Train the CLO and teams on the principles of confidentiality, active listening and referral;
- Establish safe and accessible channels for survivors;
- Actively collaborate with local service providers to support victims.

6.8. EBRD Independent Project Accountability Mechanism

All EBRD-financed projects must be structured to meet the requirements of the [EBRD's Environmental and Social Policy](#) (2024), which comprises ten environmental and social requirements (ESRs) in key areas of environmental sustainability and social, with which projects must comply, including ESR 10 on stakeholder engagement. Furthermore, [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 people and civil society organisations regarding EBRD-financed projects amongst project stakeholders, or to determine whether the Bank has complied with its environmental and social policy and the project-specific provisions of its [information](#)

[access policy](#); and, where appropriate, to remedy any breaches of these policies, whilst preventing any future breaches by the Bank.

6.9. EIB Group Complaints Mechanism

All projects financed by the European Investment Bank (EIB) must comply with the requirements of the EIB's Environmental and Social Standard No 2 (ESS2) on stakeholder engagement. In accordance with paragraph 33(e) of this standard, the EIB requires that consultation processes include specific measures to enable affected persons, particularly vulnerable, marginalised or discriminated-against groups, to participate fully and effectively in engagement processes.

In addition to the project's complaints management mechanism, the EIB provides a Complaints Mechanism, which serves as a tool for public accountability. This mechanism allows any person or community with concerns regarding a project, policy or activity of the EIB Group to exercise their right to lodge a complaint directly with the Bank.

The EIB Group's Complaints Mechanism:

- Receives and examines complaints relating to EIB-financed projects, in particular those concerning environmental degradation, threats to the health and safety of local communities, or involuntary resettlement;
- Verifies that the EIB Group's activities comply with its own internal policies and procedures;
- Proposes corrective measures or facilitates mediation where appropriate;
- Coordinates complaints received by the European Ombudsman concerning the EIB Group's activities;
- Carries out information and awareness-raising activities among citizens to improve transparency and good governance.

This mechanism offers an independent, non-judicial remedy aimed at preventing or resolving disputes between complainants and the EIB Group, whilst strengthening compliance and the effectiveness of the activities financed.

Complaints can be submitted directly via the EIB's official website at the following address:
<https://www.eib.org/fr/about/accountability/complaints/what-we-do/index.htm>

7. Monitoring, reporting and updates

Monitoring the implementation of the Stakeholder Engagement Plan (SEP) is essential to ensure the effectiveness of the actions taken, adjust approaches where necessary, and report to stakeholders and donors on the progress of the participatory process.

7.1. Engagement performance indicators

A set of qualitative and quantitative indicators will be used to assess the performance of the SEP, including:

- Number of consultation meetings organised (by phase and by target group);
- Number of participants, broken down by gender, age and vulnerability status;
- Number of information materials produced and distributed (posters, briefings, web publications);
- Stakeholder satisfaction rates (via feedback or simple surveys);
- Number of comments and complaints received, and the rate at which they are processed and resolved;
- Average response time to comments or complaints;
- Participation rate of vulnerable groups in consultations.

These indicators will be monitored on an ongoing basis by the project's Environment and Social team.

Table 7 Stakeholder engagement performance indicators

Indicator	Description	Monitoring frequency	Responsible
Total number of consultation meetings	Meetings held with stakeholders (community, institutional, targeted)	Quarterly	E&S Focal Point, Qair
Participation rate of vulnerable groups	Proportion of women, young people, herders, people with disabilities, etc. in consultations	Quarterly	E&S Qair focal point
Number of information materials distributed	Posters, radio spots, public notices, web publications	Quarterly	E&S Qair Focal Point
Number of information/awareness-raising sessions held on usage restrictions	Awareness register / minutes / attendance lists	Quarterly during construction	E&S Air Quality Focal Point

Number of complaints received regarding land access or use	GM register	Quarterly	MGP Focal Point
Percentage of participants stating they understand land use restrictions	Satisfaction survey / semi-structured interview	Annual	E&S Qair focal point
Participant satisfaction rate	Assessed via short questionnaires or verbal feedback at the end of the meeting	Half-yearly	E&S Qair focal point
Total number of comments received	All channels combined (forms, email, telephone, meetings)	Quarterly	E&S Qair focal point
Feedback response rate	Proportion of comments that have received a response or action	Quarterly	E&S Qair Focal Point
Average response time	Average time (in days) between receipt and response to a comment	Quarterly	E&S Qair Focal Point
Number of sensitive complaints (e.g. GBV/SEAH) identified and addressed	Complaints relating to gender or high-risk situations, handled confidentially	Quarterly	Qair E&S Focal Point
Number of PEPP updates carried out	Document updated in line with project developments or the local context	At each major development	E&S Qair Focal Point

7.2. Periodic reports

Reports monitoring stakeholder engagement will be produced at regular intervals, depending on the project phases:

- **Frequency:** every six months during the construction phase, then once a year during the operational phase;
- **Format:** short summary report (5 to 10 pages) accompanied by monitoring tables, extracts from consultation or complaints registers, and recommendations;
- **Distribution:** the reports will be sent to the lenders (EBRD, EIB, IFC), local authorities (governorate, delegation, municipality), and made available to the public (simplified version) via public venues (town halls, community centres) and online.

7.3. SEP Update

The SEP is a living document. It will be updated:

-
- At each key stage of the project (start of works, major change in scope or stakeholders, operational phase);
 - Following specific recommendations made by donors or local authorities;
 - Based on feedback from the field or the emergence of new groups or issues.

Updates will be carried out by Qair and validated by the relevant institutions. An updated version will be systematically distributed to the parties concerned.

8. Organisation and responsibilities

The effective implementation of the Stakeholder Engagement Plan (PEPP) relies on a clear division of roles and responsibilities among the various parties involved in the project. A governance structure has been established to ensure the coordination, monitoring and continuous adaptation of the engagement process.

8.1. SEP governance structure

The SEP is led by Qair Tunisia, through its environmental and social (E&S) expert, with the support of the environmental/social consultant and a communications expert for technical and participatory aspects. Local authorities (governorate, delegation, municipality) are actively involved in implementation on the ground, acting as institutional intermediaries and facilitators of community dialogue.

8.2. Distribution of responsibilities

Stakeholder	Key responsibilities within the PEPP
Qair Tunisia (developer)/Qair E&S expert	<ul style="list-style-type: none"> - Overall management of the SEP's implementation - Mobilisation of the necessary resources - Coordination with national and international stakeholders - Facilitating the complaints management mechanism - Overseeing communication and transparency
E&S Expert Qair /Environmental and Social Consultant / Communications Expert	<ul style="list-style-type: none"> - Technical support for the implementation of the SEP - Organising and facilitating community consultations - Production of appropriate communication materials - Monitoring of SEP performance indicators - Regular reporting to donors and the project sponsor
Local authorities (governorate, delegation, municipality)	<ul style="list-style-type: none"> - Logistical support for field activities - Participation in institutional meetings - Facilitating dialogue with local communities - Forwarding feedback or comments received locally - Support for the dissemination of information in the areas concerned

9. Indicative budget

Section	Activity	Responsible	Deadline / Frequency	Quantity	Unit	Estimated unit cost (USD)	Estimated total cost (TND)
Capacity building	Targeted training for the Qair E&S team and local stakeholders on the implementation of the SEP and the GM	Qair E&S team / Consultant	Following validation of the SEP	1	Session	5,000 USD	15,500 TND
Development of communication materials	Development of the communication plan and tools (visual identity guidelines, posters, audio/visual formats)	Communications consultant	Throughout the project	1	Study	15,000 USD	46,500 TND
Local advertising (radio/newspaper)	Broadcasting of adverts in the local dialect on Radio Gafsa and in the regional press	Communications consultant / Qair	1 year	1	Fixed fee	4,000 USD	12,400 TND
Distribution of materials	Printing and physical and digital distribution of SEP and GM materials	Communications consultant	Throughout the project	1	Fixed fee	3,000 USD	9,300 TND
SEP monitoring and evaluation	Drafting and distribution of SEP monitoring reports (PDF)	E&S Consultant, Qair	Two annual cycles	2	Study	5,000 USD	31,000 TND
Implementation of the GM	Set-up of the Complaints Management Mechanism (boxes, forms, telephone numbers, staff)	Qair team / SEP consultant	Pre-construction phase	1	Fixed price	10,000 USD	31,000 TND
Estimated total						42,000 USD	145,700 TND

Appendices

Appendix 1: Meeting minutes, attendance sheets and photographs taken

9.1. Minutes of the Qsar Delegation meeting

Date of meeting: 17/04/2025 Time of meeting: 09:15	Venue: El Ksar Delegation – Gafsa
List of participants	
Organisation	Organisation
UTAP	ASF Consulting
El Ksar Municipality	
Regional Council	
El Ksar Delegate	
Omda El Ksar	
(Agenda)	
<ul style="list-style-type: none"> • Official welcome by the Governor • Presentation of the ASF office and its role • Explanation of the Environmental and Social Impact Assessments (ESIA) and the CPR • Introduction of the team • Discussion on the potential impacts of the project • Organisation of the site visit • Discussions with stakeholders 	
(Points discussed)	
<ul style="list-style-type: none"> • The Governor welcomed the team and invited them to begin the meeting. • The ASF director introduced the organisation, explaining: <ul style="list-style-type: none"> • Its role within the project, • What an Environmental and Social Impact Assessment (ESIA) is, • The definition of the CPR, • The potential impacts of the project and the importance of the site visit to better assess them. • The ASF team was briefly introduced. • The ASF manager suggested going directly to the site to gain a better understanding. • The local representative spoke to say that this project is “environmentally friendly”, and invited those present to introduce themselves in turn. • ASF also clarified that the results of the studies would be shared with the local authorities, in a spirit of collaboration. • ASF’s environmental expert gave a simple and clear explanation of the potential environmental risks associated with the project. 	
(Next steps)	

- Conduct a site visit to observe the site's characteristics first-hand.
- Maintain ongoing communication with local stakeholders.

9.2. Minutes of the meeting at the Gafsa Governorate

Date and time of the meeting: 17 April 2025 at 3.00 pm	Venue: Gafsa Governorate
List of participants	
Organisation	Organisation
Project Manager, ASF Consulting	Secretary General of the Gafsa Governorate
Public Health	Chemical Group
Regional Development Office	El Ksar Municipality
INP Gafsa	IRADA El Ksar Association
CRDA Sol District	Member of the Regional Council
State estate	Omda el Ksar
President of the El Ksar Farmers' Union	Social Specialist, ASF Consulting
E&S Specialist, ASF Consulting	Renewable Energy Engineer, ASF Consulting
GIS	Environmental Expert, ASF Consulting
Representative for El Ksar	Representative for El Mdhila
ANDE	Public Health
Agenda	
<ul style="list-style-type: none"> • General presentation of the photovoltaic power plant project in Gafsa. • Context and objectives of the project within the framework of the Tunisian Solar Plan. • Presentation of the site location and its main technical characteristics. • Presentation by ASF Consulting, the consultancy firm responsible for the environmental and social assessment, to outline the ESIA approach and explain the consultation process. • Consultation and collection of views, comments and expectations from the stakeholders present. • Answers to questions and concerns raised during the session. • Collection of stakeholders' contact details to ensure follow-up and communication. 	
Points discussed	
<ul style="list-style-type: none"> • Opening of the session by the Secretary General of the Gafsa Governorate • Presentation of the proposed photovoltaic power plant in Aguela (Ksar district, Gafsa Governorate), its objectives, components, phases and total area by the ASF director • Identification of the localities affected by the project and clarification of their proximity to the site. • Discussion on the land situation: Three plots for the project have already been authorised; the fourth plot is still 	

under administrative processing () → need to verify its status or obtain formal authorisation.

- Concerns regarding the wadis near the site (Wadi Bayache, Wadi El Melah): Need to update the hydrological and flood risk study to ensure that the site is not exposed to hazards (runoff, flooding, erosion, etc.).
- Discussion on archaeological heritage: We need to check with the National Heritage Institute (INP) that the site does not contain any sensitive archaeological features that could block or affect the project.
- Cumulative impact with the Tunisian Chemical Group (GCT): The GCT mentioned ongoing impact and pollution studies in the vicinity; a proposal was made to make use of these studies to identify any potential cumulative risks or cross-contamination linked to the proximity of industrial sites.
- Health and safety: A question was raised regarding the presence or absence of sanitary facilities near the site for workers during the construction phase.
- Technical alternatives to consider: Need to take into account the route of the power transmission line in the project's alternative study; verification of access roads and their status, particularly the track running alongside the railway line: Coordination with STEG:
- Need to confirm the route and technical specifications of existing or planned power lines with STEG to avoid any interference.
- Local socio-economic analysis: Importance of collecting social and economic statistics (unemployment, access to services, poverty, etc.) in order to prioritise CSR actions tailored to the needs of local communities.

Actions to be taken

- Engage in direct dialogue with the relevant organisations to gather information on stakeholders' specific requirements and the project's needs.
- Organise targeted meetings with the various stakeholders (administrations, institutions, local actors) to enhance understanding of the context.

9.3. Minutes of the meeting with SNCFT Gafsa

Date of meeting: 18/04/2025	Venue: SNCFT Gafsa
Time of meeting: 9.30 am	
<i>List of participants</i>	
<i>Organisation</i>	
SNCFT Gafsa	
Project Manager, ASF Consulting	
Social worker, ASF Consulting	
<i>(Agenda)</i>	
<ul style="list-style-type: none"> • Meeting with the civil engineer from the SNCFT district of Gafsa. • Discussion on the QAIR project and the temporary occupation of the railway land. • Exchange of technical and administrative documents relating to the project. • Clarification on the next steps regarding the documentation for the 2023 visit. 	
<i>(Points discussed)</i>	
<ul style="list-style-type: none"> • The civil engineer from the Gafsa district explained to us that the QAIR project approached the SNCFT in 2023 to obtain temporary occupation of the railway land. • The SNCFT had proposed a temporary occupation, but the fees requested were considered very high by QAIR. • The engineer provided us with precise figures regarding this proposal. • Several documents were sent to us: <ul style="list-style-type: none"> ○ Law No. 74 on railways, ○ The kilometre markers or kilometre points of Line 14, ○ A KMZ file showing the DPCF zone for the railway easement. • We agreed to also retrieve the document from the site visit carried out in 2023 by QAIR. 	
<i>(Actions to be taken)</i>	
<ul style="list-style-type: none"> • Obtain the official document from QAIR regarding the 2023 site visit. • Review the documents provided (Act 74, kilometre markers, KMZ file) to better understand the constraints associated with the project. 	

9.4. Minutes of the meeting with the Regional Directorate of State Property

Date of the meeting: 18 April 2025 Time of meeting: 11.30	Venue: Regional Directorate of State Property
List of participants	
Organisation	
Regional Directorate of State Property	
Surveyor – Regional Directorate of State Property	
Project Manager, ASF Consulting	
Social Specialist, ASF Consulting	
GIS, ASF Consulting	
(Agenda)	
<ul style="list-style-type: none"> • Visit to the State Property Office in Gafsa. • Discussion regarding the plots of land involved in the QAIR project. • Exchange of information on the land situation and handover of documents. 	
(Points discussed)	
<ul style="list-style-type: none"> • The State Land Office presented the land tenure status of the plots affected by the project. • It was clarified that several of the plots in question are communal lands belonging to different ‘aarch’ tribal groups. • Some plots are the subject of disputes between different tribal groups, which could complicate land regularisation. • It was noted that the future power line is to pass over some of this communal land. • Part of the route crosses specific land belonging to an Arch, requiring particular attention. • To support this information, the State Land Department has provided the following documents: <ul style="list-style-type: none"> ○ A KMZ file locating the plots concerned, ○ A topographical map of the area, ○ A photo of a detailed plot plan. 	
(Next steps)	
<ul style="list-style-type: none"> • Analyse the KMZ file, the topographic map and the cadastral map to precisely identify the plots concerned and any potential areas of conflict. • Verify the legal status of the land crossed, particularly communal land and land belonging to an Arch • Prepare a detailed map incorporating land tenure data to facilitate regularisation and consultation processes. 	

9.5. Minutes of the CRDA CES meeting

Date and time of the meeting: 18 April 2025 at 10.00 am	Venue: Water and Soil Conservation	
List of participants		
Organisation	Organisation	
Member of the Gafsa Regional Council	E&S Specialist, ASF Consulting	
Senior Technician, Ksar-Mdhila region	Environmental Expert, ASF Consulting	
CES Technician, Gafsa	Renewable Energy Engineer, ASF Consulting	
CES District Manager		
Agenda		
<ul style="list-style-type: none"> • General presentation of the photovoltaic power plant project in Gafsa. • Presentation of the site location and its main technical characteristics. • Presentation by ASF Consulting, the consultancy firm responsible for the environmental and social assessment, to outline the ESIA approach and explain the consultation process. • Consultation and collection of opinions, comments and expectations from the CES district • Answers to questions and concerns raised during the session • Data collection 		
Points discussed		
<ul style="list-style-type: none"> • Opening of the session by the Head of the CES district. • Detailed presentation of the solar project led by Qair, the financing framework provided by the EBRD and ASF Consulting's role in carrying out the ESIA • Questions raised by management regarding the plant's operating method, the EBRD's investment policy, and the number of jobs created, particularly during the construction phase. • A representative clarified that this is the first project of its kind in the Gafsa region, which makes it particularly innovative. • An explanation was provided regarding the jobs generated during the construction phase (local workforce, subcontracting, etc.). • Confirmation was obtained that ONAS does not discharge into the Oued El Melah, thereby eliminating the risk of indirect pollution of the site. • As the managing director and the senior technician have only recently been appointed, they do not yet have all the historical data on the area. • There are no studies or records in this department concerning flood protection for the Oued Bayache. • The practice of limiting erosion using gabions was applied in the years following the 1990 flood in Gafsa, but no active structures are recorded in the archives. • Based on current knowledge, the project area is not considered to be at risk of flooding. • The Oued Bayache catchment area is located on Algerian territory, which complicates direct local management. • Mention of the presence of maps at the district chief's office, illustrating the areas where dunes are being 		

stabilised to combat siltation.

9.6. Minutes of the CRDA District Soil Committee meeting

Date and time of the meeting: 17/04/2025 at 3.00 pm		Venue: CRDA-District Sol	
List of participants			
Organisation		Organisation	
Environmental Expert, ASF Consulting		Renewable Energy Engineer	
E&S Specialist		CRDA-Sol District	
Member of the Regional Council			
Agenda			
<ul style="list-style-type: none"> • General presentation of the proposed photovoltaic power plant in Gafsa. • Presentation of the site location and its main technical characteristics. • Presentation by ASF Consulting, the consultancy firm responsible for the environmental and social assessment, to outline the ESIA approach and explain the consultation process. • Consultation and collection of views, comments and expectations from the head of the CES district • Answers to questions and concerns raised during the session. 			
Points discussed			
<ul style="list-style-type: none"> • The Director of the Sol district opened the meeting. • Description of the project and the context of ASF Consulting's involvement • The Director was not aware of the application for authorisation for the fourth plot. • Reading of the initial authorisation document relating to a capacity of 100 MW (for the first three plots). • Discussion on the agricultural use of the land and the restricted areas that could hinder authorisation. • The conservation area status is still under review. • The map presented at the meeting with the forestry department has not been validated. • The official reference map is the 1988 version, and a request has been sent to Qair for its provision. • The agricultural use of the fourth plot has been confirmed. • Reservations have been expressed regarding flood risks and the proximity of the DPH, which must be analysed for the authorisation. • The agricultural use of the land must be maintained despite the implementation of the project. • Management has no objection to the route of the high-voltage (HV) line crossing communal land used for agricultural purposes. • The HV line is subject to the same procedures and requirements as the plots (land registry records, authorisations, etc.). • It was noted that the applications submitted by Qair cover only the first three plots; the fourth plot and the HV line are to be added. • If the project poses a risk of erosion, corrective measures will need to be taken. • The Forestry Department is responsible for wooden fences and anti-silting measures, as shown on the maps available at the CES headquarters. 			
Next steps			
<ul style="list-style-type: none"> • An agricultural map to be developed jointly with a clearly defined perimeter based on the project site • The district chief will be our point of contact • An email will be sent by the ASF Consulting expert team specifying the specific requests to the district chief • Clarification regarding the status of the authorisation for the 4th plot will be provided to the district 			

Minutes of the CRDA (Regional Forestry Directorate) meeting

Date and time of the meeting: 17 April 2025 at 3.00 pm		Venue: Forestry Directorate	
List of participants			
Organisation		Organisation	
Environmental Expert, ASF Consulting		Renewable Energy Engineer	
E&S Specialist		Head of Forestry	
Member of the Regional Council			
Agenda			
<ul style="list-style-type: none"> • General presentation of the Gafsa solar power plant project. • Presentation of the site location and its main technical characteristics. • Presentation by ASF Consulting, the consultancy firm responsible for the environmental and social assessment, to outline the ESIA approach and explain the consultation process. • Consultation and collection of views, comments and expectations from the Head of the Regional Forestry Directorate • Answers to questions and concerns raised during the session. 			
Points discussed			
<ul style="list-style-type: none"> • The Head of the Regional Forestry Directorate (Gafsa) opened the session • Description of the project, the context and the role of ASF Consulting as the environmental and social consultancy firm • Brief discussion on the vegetation present at the project site • Management indicated that it had no objections or reservations regarding the project location. 			

9.7. Minutes of the meeting with INP Gafsa

Date of the meeting: 18 April 2025	Venue: INP – Gafsa
Time of meeting: 3.00 pm	
List of participants	
Organisation	
INP	
Social specialist, ASF Consulting	
E&S Specialist, ASF Consulting	
GIS ASF Consulting	
(Agenda)	
<ul style="list-style-type: none"> • Visit to the National Heritage Institute (INP) – Gafsa branch. • Checking for the possible presence of historic monuments on the project site and along the power line route. • Discussion on access to heritage data. 	
(Points discussed)	
<ul style="list-style-type: none"> • A discussion took place with the head of heritage conservation at the INP in Gafsa to obtain information on the possible presence of protected monuments or sites in the area covered by the project. • The officer stated that, due to internal procedures and data privacy policy, he was unable to share the requested information directly. • It was indicated that an official request must be submitted in order to access data relating to heritage monuments and sites. • In view of these constraints, it was decided to obtain the records of Gafsa's monuments directly from the central INP in Tunis, in order to speed up the process of obtaining the necessary information. 	
(Next steps)	
<ul style="list-style-type: none"> • Obtain the records of Gafsa's monuments from the INP in Tunis. • Analyse the records to verify that there are no major heritage constraints along the project route. 	

Minutes of the debriefing meeting

Date and time of the meeting: 20 November 2025 at 3.00 pm	Venue: Gafsa Governorate
List of participants	
Organisation	Organisation
Secretary General of the Gafsa Governorate	Project Manager, ASF Consulting
Public Health	Chemical Group
El Ksar Representative	Gafsa Regional Health Directorate
Representative for El Mdhila	Ministry of Agriculture
Regional Development Office	El Ksar Municipality
INP Gafsa	IRADA El Ksar Association
CRDA Sol District	Member of the Regional Council
State estate	Omda el Ksar
President of the El Ksar Farmers' Union	Irada Association
E&S Specialist, ASF Consulting	Renewable Energy Engineer, ASF Consulting
Regional Directorate of Social Affairs	Environmental Expert, ASF Consulting
Secretary General, Municipality of Mdhilla	SNCFT Gafsa
ANPE Gafsa	Public Health
Headteacher of El Waha Primary School	Head of STEG Station
Regional Council	STEG Gafsa
Farmers' Union	ONAS Gafsa
El Ksar Municipality	State Estate
Agenda	
Public consultation meeting with stakeholders <ul style="list-style-type: none"> - Brief overview of the project - Project debriefing workshop and presentation of the main findings of the environmental and social assessment carried out by the ASF Consulting team. - Discussion regarding the commitments of each stakeholder 	
Items discussed	
<ul style="list-style-type: none"> • Opening remarks by the Secretary General of the Gafsa Governorate. • Announcement by Qair: work scheduled to start in Q1 2026, by March 2026 at the latest. • Presentation by ASF Consulting: <ul style="list-style-type: none"> ○ Overview of the project and technical details ○ Presentation of the agenda ○ Purpose of the debriefing meeting ○ Key findings, environmental and social issues ○ Impacts and measures ○ Workforce, logistics ○ Stakeholder engagement • Remarks by the El Ksar Representative: 	

- Confirms a certain familiarity with Qair (joint field trips).
- Questions regarding:
 - Transport of workers: Qair specifies that this will be the responsibility of the construction companies, not Qair.
 - Access track: this already exists; Qair is only planning to improve it.
 - Request for the track to be tarmacked.
- Questions regarding the SNCFT (Tunisian National Railway Company):
- Authorisation is currently being processed via the Ministry.
- Disagreement over the amount requested for the right of way:
 - SNCFT is demanding ~200,000 DT/year.
 - Qair considers this amount excessive as the project serves the public interest.
 - The SNCFT representative mentions that this amount is based on the valuation by the State Property Services and that a downward revision could be perceived as 'feses' (corruption).
- Site fencing: Qair confirms that the power station will be fully fenced with barbed wire.
- Timetable: reminder of the remaining steps (financing agreement, building permit submitted, approval by the Higher Council of Administration, etc.).
- Proposal for a route parallel to the existing STEG line → Qair explains that this is not possible due to a land dispute between two clans in this area.
- Institutional interventions:
 - Representative from Mdhilla: the State will facilitate the procedures; no party will be able to block them if the State's intention is clear.
 - El Ksar delegate: highlights the mandatory municipal fees, regardless of ministerial guarantees.
 - CRDA: questions regarding the water source and landscaping (planting – "tachjîr") → Qair confirms that these elements are included in the building permit application.
- Discussion on the "El Mounâwla" law (law governing subcontracting):
 - Qair clarifies that this law mainly concerns subcontractors and their workers, not Qair directly.
 - He guarantees that all workers will be registered.
- Headteacher of El Waha Primary School:
 - Confirms general acceptance of the project.
 - Proposes connecting the school to the solar power plant.
- Qair points out that the projects include a community budget (CSR)
 - renovations,
 - micro-projects,
 - support for schools,
 - other local initiatives.
- Proposal to power street lighting via the power station.
- Employment agencies will handle recruitment for the construction phase.
- Qair highlights the national energy crisis: a 63% shortfall plus power cuts; a call to avoid any delays.
- End of meeting:
- Request for an action plan and a CSR programme at Qair.
- Closing remarks by the Secretary-General of the Gafsa Governorate.

Next steps

- Be available to all relevant stakeholders to clarify issues and speed up procedures
- Initiate procedures as soon as possible to avoid delays

Appendix 2: Complaint Form

Date:

.....

Prepared by:

.....

Complaint No.:

.....

Complainant:

.....

Home address:

.....

Telephone number:

.....

Reason for complaint (detailed description):

.....

Location concerned by the complaint:

.....

Classification of the complaint (tick the applicable box)

Claim

Omissions in the inventory

I am not satisfied with the valuation

I have not been compensated as agreed

Inventory error

The work caused damage to my crops

Comment

Suggestion/request

Has this complaint already been raised on the SS website or through another channel?

Yes No

Has the complaint already been referred to the courts?

Yes No

Follow-up on the complaint (please note the stages of processing)

.....

.....

Signature of the complainant:

Date of signature:

Signature of XXXX who received the complaint:

Date of signature:

Appendix 3: Complaint closure form

Complaint No.:

Date of complaint:

Prepared by:

Complainant:

Home address:

Telephone number:

Reason for the complaint (detailed description):

.....

Location concerned by the complaint:

.....

Response provided:

This response:

.....

- I am fully satisfied. In this case, the complaint is closed on DATE at LOCATION
- I am not satisfied with the situation. Consequently, I wish to take legal action or refer the matter to the relevant authorities."

Signature of XXXX:

Date of signature:

Signature of the complainant:

Date of signature:

Appendix 4: Record sheet for complaints relating to GBV**1. General Information**

Complaint registration number: [To be completed by the manager]

Date received: [DD/MM/YYYY]

Channel of receipt:

- Telephone
- Email
- Drop-in box
- Community meeting
- Other: _____

2. Information about the Complainant (Optional for anonymity)

Surname and first name: [If the complainant chooses to identify themselves]

Gender: Male Female Other: _____

Contact details (Telephone/Email): [Optional]

Age (approx.): _____ years

Status:

- Directly affected party
- Witness
- Community representative
- Other: _____

3. Nature of the complaint

Type of GBV-related incident (tick all that apply):

- Verbal harassment
- Physical harassment
- Sexual harassment
- Sexual exploitation or abuse
- Early/forced marriage
- Other: _____

Location of the incident: _____

Estimated date of the incident: [DD/MM/YYYY or approximate]

4. Description of the complaint

Summary of the facts:

[Briefly explain the situation as described by the complainant.]

Identity of the person alleged to be responsible (if known and if the complainant wishes to disclose this):

[Name or role/position of the person concerned, if applicable.]

5. Level of Confidentiality (to be confirmed with the complainant)

- Fully confidential (no disclosure of identifiable information).
- Partially confidential (some information may be shared for investigation purposes).
- Non-confidential (all information may be shared).

6. Immediate Action

Action taken upon receipt of the complaint:

- Recorded in the system.

- Forwarded to the complaints management mechanism.
- Referral to a support service (psychological/legal).
- Other: _____

7. Follow-up and Resolution

Person responsible for follow-up: [Name/Position]

Measures planned for resolution:

[Include proposed steps, e.g. investigation, mediation, support for the complainant, etc.]

Current status of the complaint:

- Under investigation
 - Resolved
 - Referred to an independent mechanism
 - Other: _____
- Date complaint closed: [DD/MM/YYYY]

Annex 5: Complaints Register

Date of initial registration	Complainant	ID	Nature of complaint	Location concerned by the complaint	Communication of the complaint	Eligible/Not eligible	Follow-up	Person responsible for follow-up	Status of the complaint