

Republic  
of Tunisia

Qair

## LAND ACQUISITION AND RESETTLEMENT FRAMEWORK

**Project to relocate a 237 MWp photovoltaic power  
plant in Khobna – Sidi Bouzid**

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## List of abbreviations

Abbreviation	Meaning
<b>AFA</b>	Agricultural Land Agency
<b>EIB</b>	European Investment Bank
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>CAPPP</b>	Commission for Acquisitions for Public Projects
<b>CATR</b>	Land Acquisition and Resettlement Framework
<b>CRDA</b>	Regional Agricultural Development Commission
<b>DPH</b>	Public Water Domain
<b>DPR</b>	Public Road Domain
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>EP</b>	Performance Requirement (EBRD)
<b>MGP</b>	Complaints Handling Mechanism
<b>CMM-R-GBV</b>	Complaints Management Mechanism - Resettlement - Gender-Based Violence
<b>NP</b>	Performance Standard (IFS)
<b>OTC</b>	Office of Topography and Cadastre
<b>PAES</b>	Environmental and Social Action Plan
<b>PAR</b>	Resettlement Action Plan
<b>PAP / PAPS</b>	Person(s) Affected by the Project
<b>QAIR</b>	Qair Group (Project developer)
<b>R-LRF</b>	Resettlement and Livelihood Restoration Framework
<b>SDMVA</b>	Agricultural Development and Promotion Companies
<b>SFI</b>	International Finance Corporation

This Land Acquisition and Resettlement Framework has been developed as part of the project to build a 120 MWp solar photovoltaic power plant in the Mezzouna district of the Sidi Bouzid Governorate. Led by QAIR, this project is part of the national energy transition strategy aimed at promoting renewable energies and reducing Tunisia's dependence on fossil fuels.

Located on approximately 270 hectares of state-owned land, the project involves the installation of a high-voltage power line over a distance of approximately 45 km. These components require land acquisitions or temporary occupations that may have an impact on certain individuals, communities, or institutions.

This LARF defines the guiding principles, institutional responsibilities, compensation mechanisms, and social management procedures applicable in the event of land impact or land use restrictions. It is based on Tunisian regulations, while ensuring compliance with the environmental and social standards of the international lenders involved in the project, notably the EBRD, the EIB, and the IFC.

Particular attention will be paid to certain cross-cutting issues, such as gender, equity, accessibility of appeal procedures, and situations of vulnerability, with a view to prevention, inclusion, and respect for rights.

The objective of the LARF is to ensure that all persons affected by the project receive fair treatment, just compensation, and appropriate support, within a framework that is transparent, participatory, and compliant with international standards on involuntary resettlement.



## 1 SCOPE OF THE LAND ACQUISITION AND RESETTLEMENT FRAMEWORK: INTRODUCTION

The Involuntary Displacement and Resettlement Policies apply to all cases of land acquisition and access restriction, and/or reduction of resources due to the implementation of a project.

"Displacement" refers to situations where:

- i) Individuals or a group of individuals are forced to leave their land, homes, farms, etc., **or suffer a loss of access to essential natural resources;**
- ii) They suffer loss or disruption of their sources of income and/or livelihoods;
- iii) They suffer restrictions on access to resources, including conservation areas (parks or protected areas), due to project activity.

"Resettlement" also refers to the process of assisting displaced persons in relocating and restoring or improving their livelihoods, income, and living conditions.

Displacement can be physical, economic, or both.

:

- **Physical displacement:** Loss of people's homes and property due to land acquisition for a project, forcing them to move elsewhere;
- **Economic displacement:** Loss of people's sources of income or livelihoods due to land acquisition or restrictions on access to certain resources (land, water, forest), or due to the construction or operation of a project or its ancillary facilities. Not all economically displaced people necessarily need to move because of a project.

Resettlement is considered involuntary when the affected people do not have the right to refuse the acquisition of their land or **resources**, resulting in a loss of livelihood, income, or living conditions compared to their situation before the project.

The usual forms of involuntary resettlement are:

- **Rural resettlement:** Resulting from the acquisition of agricultural land, pasture, or rangeland for a project, or the removal of access to natural resources on which the affected populations depend for their livelihoods (forest products, wildlife, fishery resources, etc.).
- **Urban resettlement:** Physical and economic displacement, affecting housing, employment, and businesses;
- **Linear resettlement:** Projects involving linear land acquisition (roads, railways, canals, power lines);
- **Spot resettlement:** Heterogeneous projects (factories, ports, highway interchanges, hotels, commercial plantations, etc.), where the land acquired covers a given area.

## 1.1 *Scope and content of this framework*

The Land Acquisition and Resettlement Framework is the reference for all policies and procedures governing the process of compensation and compensation for persons affected by this project. It applies both to persons with legal title and to those without legal title whose land, property, or agricultural activities will be acquired in the course of project implementation.

This document aims to clarify and simplify the application of Tunisian regulations relating to expropriation for public use and compensation, while ensuring compliance with the requirements of the international lenders involved in financing the project, namely the EBRD (European Bank for Reconstruction and Development), the EIB (European Investment Bank), and the IFC (International Finance Corporation).

Tunisian regulations provide for different compensation mechanisms depending on the case, with the possibility in some situations of offering those affected alternatives, such as land swaps, on an exceptional basis.

The purpose of this Framework is to identify project-related losses and define the guiding principles, institutional arrangements, and criteria for developing future Resettlement Action Plans (RAPs), if necessary, to be implemented for the subprojects concerned. It mainly concerns the project component relating to the installation of a photovoltaic power plant in Khobna, as well as energy transmission, two activities requiring construction work and likely to result in land acquisition or displacement.

This framework sets out guidelines for impact mitigation, compensation, consultation, disclosure, and claims management. It is designed as a guidance tool for QAIR to ensure that all the rights of potentially affected persons are respected in accordance with national standards and the requirements of partner financial institutions.

This document is based on available information (estimated routes, field data,.) collected in April, May, June, and July 2025.

## 1.2 *Key definitions*

**The Land Acquisition and Resettlement Framework:** The document that sets out the principles guiding the development of a Resettlement Action Plan (RAP), once the investment is sufficiently defined to determine its impacts.

**Resettlement assistance:** A form of compensation for project-affected persons (PAPs). This assistance may include cash and/or in-kind support to cover relocation and resettlement costs, accommodation, and various services to affected persons, such as moving expenses and lost work time.

**Compensation:** Monetary or in-kind payment, or a combination of both, for the cost of all property (land, infrastructure, fixed facilities, crops, trees, etc.) lost due to expropriation for public use.

**Conflicts:** Differences of opinion arising from the logic and issues between the various actors during expropriation and/or resettlement are considered conflicts. These are situations in which two or more parties pursue competing intentions or adhere to divergent values in an incompatible manner, resulting in confrontation (negative) or negotiation and agreement (positive). In both cases, the Project must have mechanisms in place for social mediation and conflict prevention.

**Replacement cost:** For houses and structures, this refers to the full cost of building a new structure equivalent to the one affected, including all transaction costs necessary for the replacement. For land, crops, trees, and other assets, the replacement cost corresponds to the value sufficient to replace these assets, including additional costs related to replacement and transaction, and not just their current market value.

**Cut-off date:** This is the date on which the census and inventory of persons and property affected by the project are completed. Persons occupying the Project area after the cut-off date are not eligible for compensation or resettlement assistance. Similarly, immovable property established after the cut-off date is not compensated.

**Involuntary displacement:** refers to the displacement of a population or group of people necessary for the completion of a project in the public interest, when the affected persons do not have the right to refuse the taking of their land or resources.

Involuntary displacement occurs in the following cases, among others:

- Expropriation using state powers (eminent domain);
- Negotiated agreements in which expropriation may be used as a last resort if negotiations with the owner fail.

All such measures must be well documented and communicated to those affected.

**Physical displacement:** Loss of housing and property due to land acquisition for a project, requiring the affected person to move to a new location. Physically displaced persons must move because of the project.

**Vulnerable Groups:** People who, due to gender, age, physical or mental disability, or economic or social factors, may be more significantly affected by the displacement and resettlement process, or whose ability to claim or benefit from resettlement assistance and other benefits may be limited.

**The Resettlement Action Plan (RAP):** describes and defines the entire process of resettling a population following involuntary displacement, including the potential impacts of the project and the applicable legal framework. It includes, in particular:

- **Analysis of the situation prior to displacement**, including demographic, socioeconomic, and sociocultural information on the affected population and the host population;
- **Identification and assessment of lost assets and resources;**
- **Identification and assessment of the resettlement site;**
- **Plan for preparing the resettlement site;**
- **Transition plan**, including transportation and logistics aspects;
- **Definition of the administrative framework**, responsibilities, and organization;
- **Description of the participatory process**, monitoring, budget, and schedule;
- **Objectives and principles to be applied** in the resettlement process;
- **Approach to compensation and rights/indemnities** for affected persons;
- **Approach to restoring livelihoods;**
- **Consultation and grievance mechanism.**

**Project Affected Persons (PAPs):** these are individuals, households, and communities whose livelihoods are negatively affected by the implementation of a project due to (i) involuntary displacement or loss of place of residence or economic activities; (ii) loss of some or all of their investments (property and assets); (iii) temporary or permanent loss of income or sources of income; or (iv) loss of access to such income or sources of income.

**Involuntary resettlement:** All measures to mitigate or compensate for the negative impacts of a project resulting from the physical and/or economic displacement of affected populations, including compensation, relocation, and economic rehabilitation. The term "involuntary resettlement" is used in the standards of the EIB, the IFC, and the European Bank for Reconstruction and Development (EBRD).

**Requisitioned land:** land temporarily used by the State or a public authority for a public utility project, without transfer of ownership. Requisition is an exceptional measure that entitles the owner to compensation for the loss of use of the land during the period of occupation. It is generally decided in emergency situations or in the context of a priority project requiring rapid availability of land.

## 2 PROJECT DESCRIPTION AND POTENTIAL IMPACTS OF THE PROJECT

### 2.1 *Project overview and territorial context*

The project to build a solar photovoltaic power plant in Khobna, located in the governorate of Sidi Bouzid, is fully in line with Tunisia's national energy transition strategy. This strategy aims to promote renewable energies in order to reduce the country's dependence on fossil fuels, particularly natural gas, and to contribute to the reduction of greenhouse gas emissions in line with Tunisia's international commitments.

The governorate of Sidi Bouzid, in the center-west of the country, is a predominantly agricultural region with significant potential for early crop production, organic farming, and irrigated arboriculture. The territory has a semi-arid landscape marked by limited irrigated areas, agricultural plains, and a few seasonal water bodies. The topography is characterized by terrain that generally slopes gently towards the east, with moderate relief to the east and south.

Socio-economically, Sidi Bouzid faces several challenges, such as high unemployment, particularly among young graduates, poverty that is more pronounced than the national average, and limited access to infrastructure and services, particularly in education and transportation. These realities reinforce the need to promote structural projects that can stimulate local economic development, create jobs, and improve the quality of life for the population.

In this context, the installation of a solar photovoltaic power plant in Khobna represents a strategic opportunity, both in terms of energy and the economy. The project will contribute to diversifying Tunisia's energy mix, harnessing the region's significant solar potential, and promoting territorial inclusion through the development of modern infrastructure. It is therefore part of a dynamic effort to support sustainable energy transition and improve socio-economic conditions in the governorate.

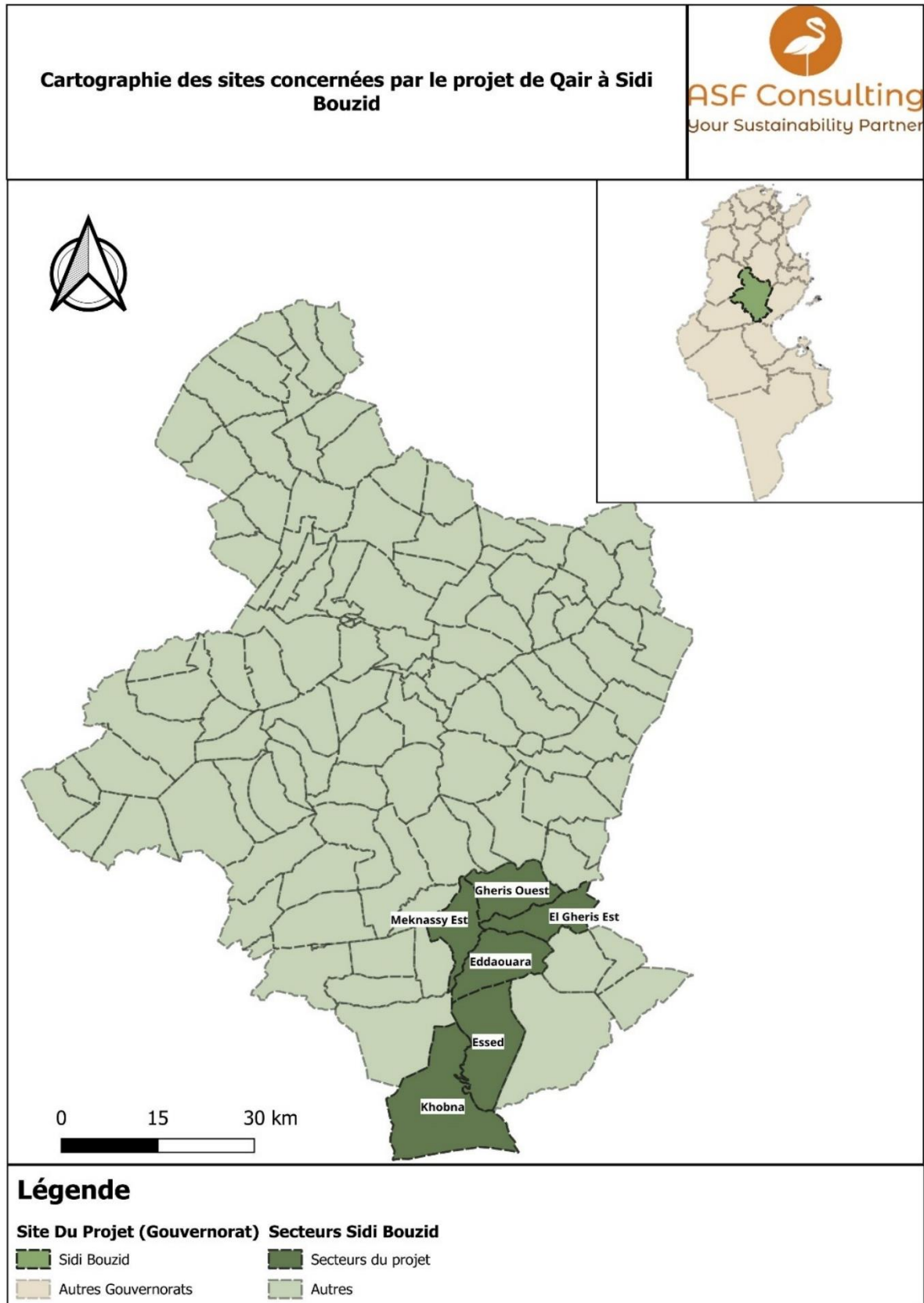


Figure1 : Map of the delegations involved in the project



## 2.2 project

The project is part of a national strategic vision aimed at promoting renewable energies as a lever for sustainable development. Its objectives, location, justifications for the choice of site, and expected benefits are presented below.

### Project objectives:

The project aims to generate electricity from a clean and renewable energy source, thereby:

- Reduce Tunisia's dependence on fossil fuels, particularly natural gas;
- Achieve 35% of electricity produced from renewable energies by 2030;
- Reduce national carbon intensity by 45%;
- Strengthen the country's energy independence;
- Contribute to the reduction of greenhouse gas emissions.

### Location:

The project is located in El Khobna, in the Mezzouna delegation (Sidi Bouzid governorate), on approximately 270 hectares of land belonging to the Tunisian state. The site is located approximately 3 km from the center of Mezzouna, near Sebkha Ennaouel, and about 40 km from the port of Skhira. The direct footprint of the project does not include any dwellings. The direct footprint of the project does not include any permanent dwellings. There are only a few huts used for pastoral activities, but these are not residences, as these activities are seasonal in nature.

### Justification for the choice of site:

- Availability of public land;
- Significant solar resources in the region;
- Low environmental impact compared to conventional production methods;
- Ability to quickly integrate into the electricity grid via a 45.5 km high-voltage line connected to the STEG substation in Maknassy;
- Response to constraints related to the energy deficit and the rising cost of imported hydrocarbons.

### Expected benefits:

- **Environmental:**

Annual reduction of more than 215,000 tons of CO<sub>2</sub> equivalent; very low water consumption.

- **Economic:**

Creation of direct and indirect jobs during construction and operation; reduction in the national energy bill; support for the local energy industry.

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- **Social:**

Employment opportunities for local populations, particularly young people and women;  
improvement of local infrastructure; stimulation of regional development.

- **Strategic:**

Strengthening Tunisia's energy security; contributing to national energy sovereignty.





## 2.3

The El Khobna solar photovoltaic power plant project is based on two main technical components, which are interconnected and complementary, and necessary for its implementation:

- **The solar photovoltaic power plant:** It will be built on land belonging to the Tunisian state (private state property), covering a total area of **267.7 ha**. This site will house a power plant with an installed capacity of **236.9 MWp**. It will include photovoltaic modules mounted on horizontal solar tracking structures, inverters, transformers, distribution panels, technical rooms, a monitoring system, a security fence, and a water tank for cleaning.
- **The high-voltage overhead power line (LEAHT):** approximately 45.5 km long and with a voltage of 225 kV, this line will enable the electricity produced to be fed into the national grid. It will be built in accordance with current technical and environmental standards. The pylons will be erected on three types of land: private land, requisitioned land, and state-owned land.
- **A section of access road** approximately 1 km long will be built to connect to the existing 2.65 km access road previously built by the Scatec project. This road will allow heavy vehicles to access the photovoltaic power plant site. The section to be built will cross land belonging to the State's Private Domain.

## carte du tracé de la ligne électrique HT du projet de khobna Sidi Bouzid

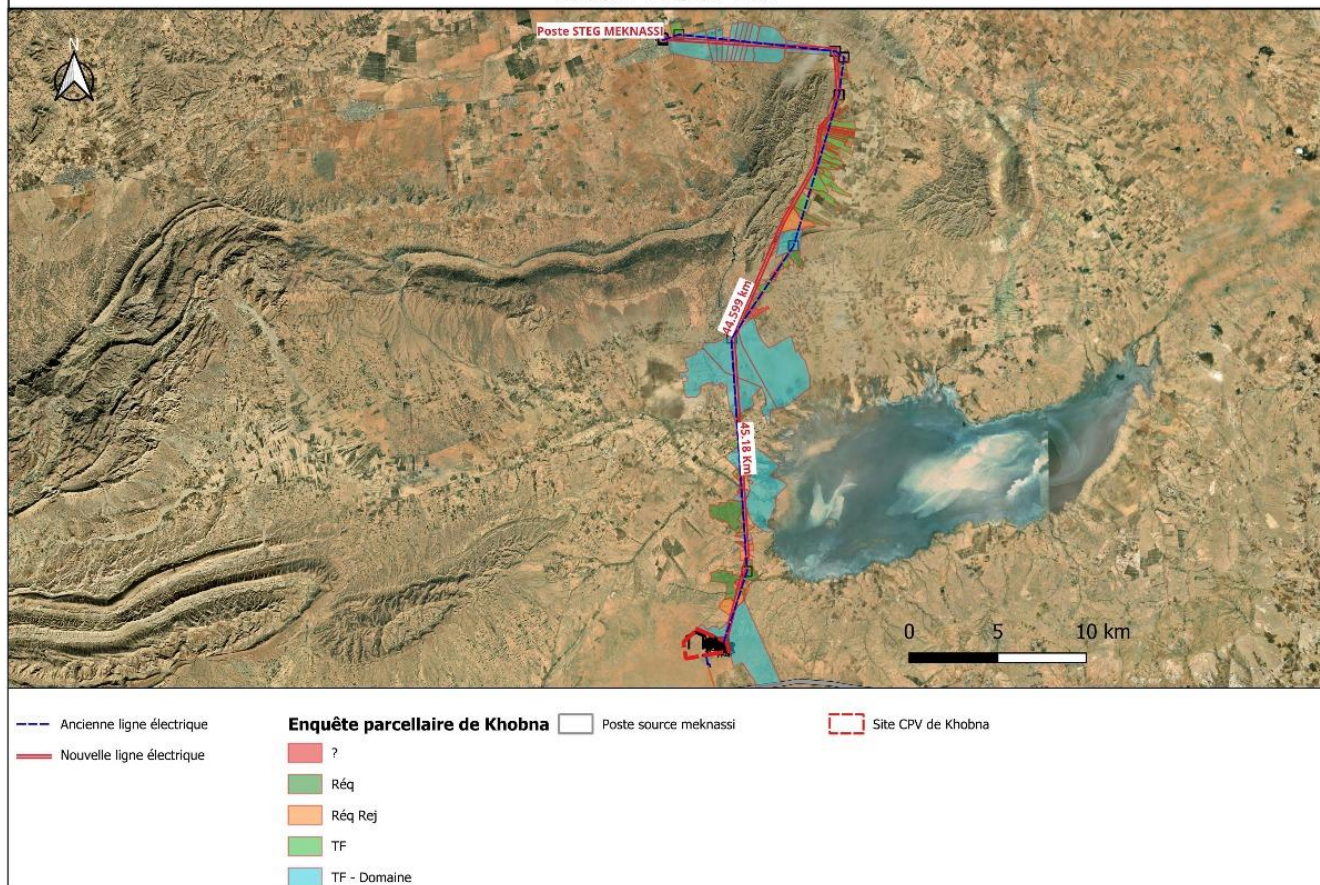
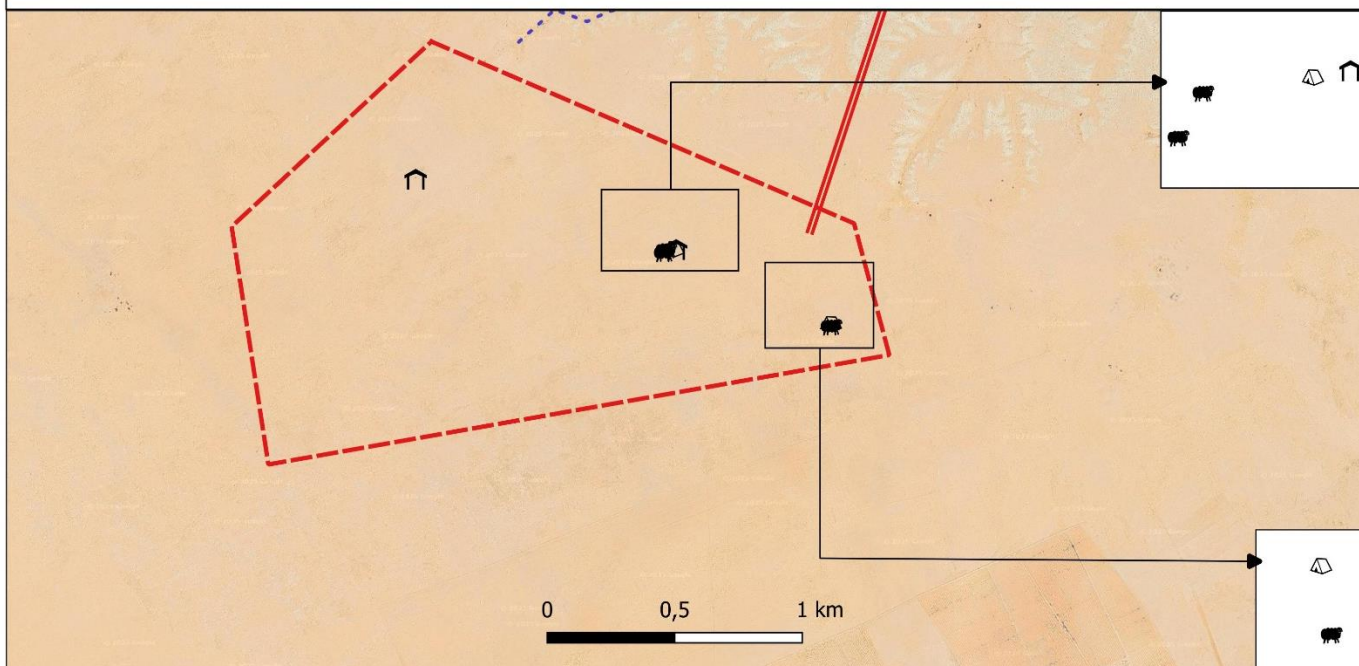


Figure2 : Site of the PV power plant project in Sidi Bouzi

## *2.4 The potential footprint of the project and its impact on land*

- The El Khobna solar photovoltaic power plant site will occupy a single plot of land covering approximately 270 hectares. This land is uninhabited but is used permanently for grazing by local livestock farmers.

## Localisation des personnes affectées par le projet de Centre photovoltaïque de site d'El Khobna



### Légende

- |                       |  |
|-----------------------|--|
| Site du Projet        | <b>Personnes affectées par le projet</b> |
| Ligne de Transmission | cabane                                   |
|                       | Eleveurs de bétail                       |
|                       | tente                                    |

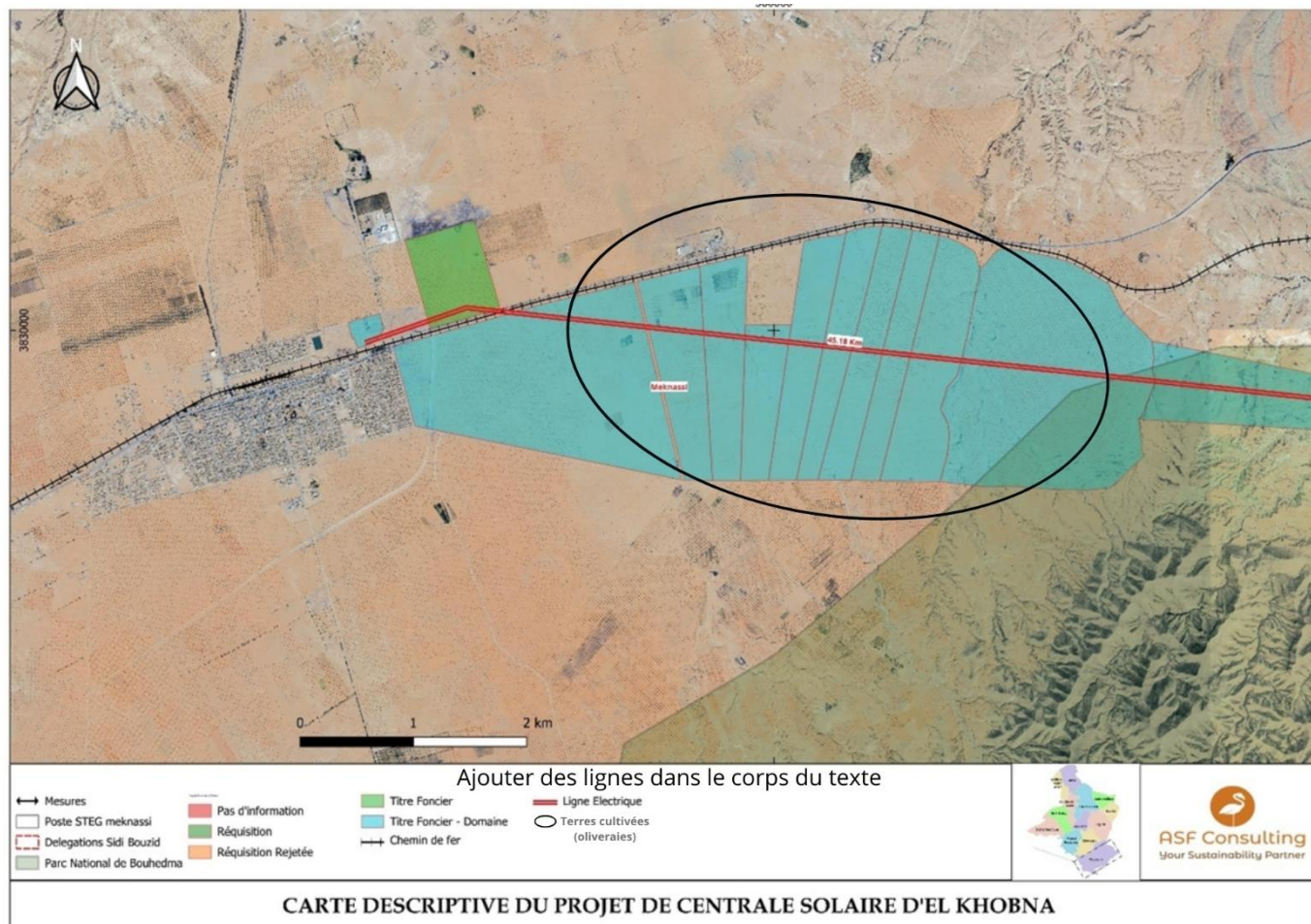
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3 : Location of inhabited huts in the project power plant

land:

- The power line will cross public and private land. Some private land is occupied by families and contains dwellings, while other land is used for agriculture, particularly olive cultivation. Although no physical displacement is planned, it is possible that certain activities, such as agriculture or grazing, may be affected.







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4 : Construction zone crossing olive groves

- No private land will be acquired for the development of the section of the track.

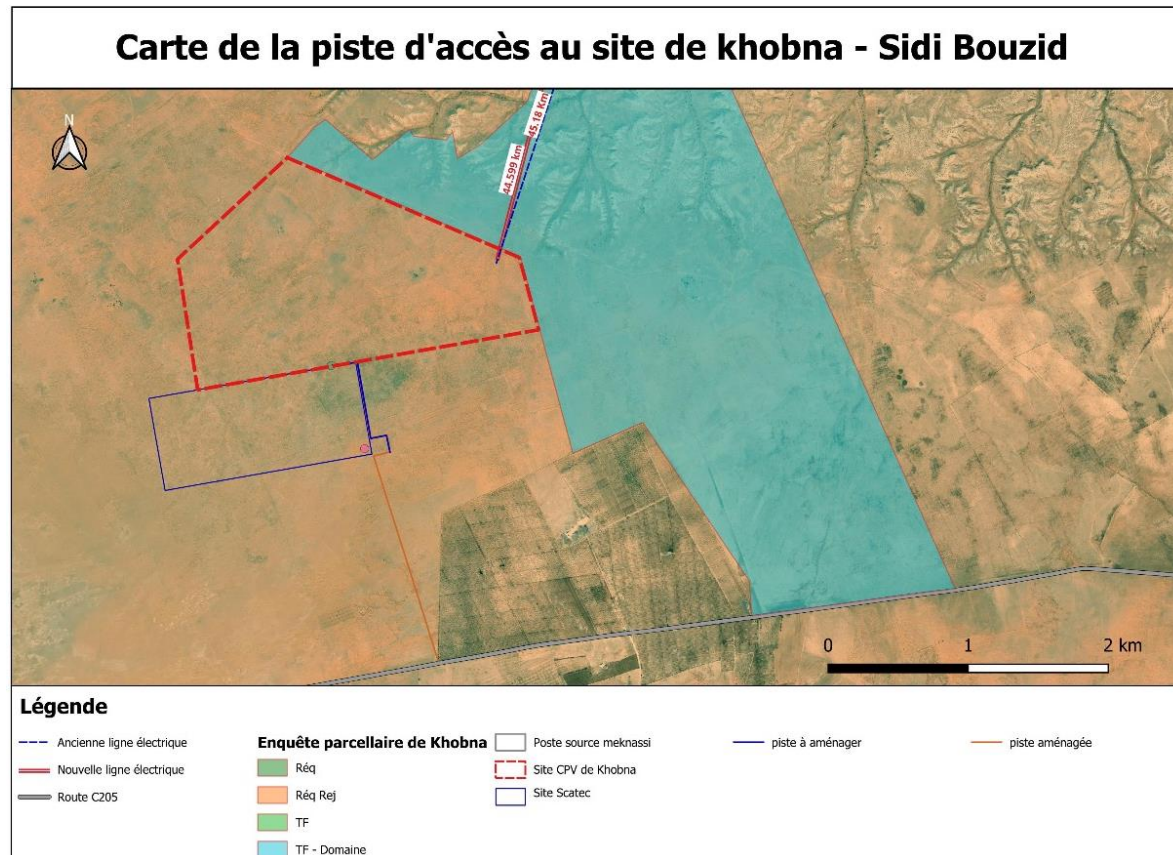


Figure5: Map of the access road to the PV power plant site

The estimated land requirements for the lines and land use along the line routes are based on the following assumptions:

- Power line:
  - The transmission line will require the installation of 109 pylons, including 7 corner pylons, 2 stop pylons, 5 anchor pylons, and 95 alignment pylons.
  - The area occupied by each tower is 64 m<sup>2</sup>;
  - The average distance between towers is estimated at between 400 and 500 meters.
  - There are 6 fruit trees per pylon.
  - Provisional road access for the installation of a pylon and cable pulling (average length of 450 m for a 4 m wide track).
- The road access track to the power plant is 1 km long and 6 meters wide.

The table below summarizes the land requirements for the project.

1 : Summary of land losses and impacts by project component

Component	Land loss	Land occupation	Other types of losses identified (structures, equipment, works, income, etc.)
Photovoltaic power plant	1 plot of private state-owned land covering 267.7 ha (permanent loss)	Uncultivated agricultural land used for grazing	Loss of pastoral use, loss of livestock cabin, loss of annual crops
45.5 km of high-voltage power line	<ul style="list-style-type: none"> <li>– Permanent loss of land for the installation of 109 pylons (6,976 m<sup>2</sup> or 0.7 ha)<sup>1</sup></li> <li>– 132 plots identified by the land survey conducted by Qair</li> <li>– Meknassy</li> <li>– Temporary tracks for cable laying (2 tracks/km)</li> </ul>	<ul style="list-style-type: none"> <li>– 32 state-owned lands</li> <li>– 79 privately owned titled land</li> <li>– 19 requisitioned land</li> <li>– One intersection with railway line No. 5 at</li> </ul>	Loss of pastoral use, loss of crops and agricultural income from cultivated private land
Access road (approximately 1 km to be developed)	<ul style="list-style-type: none"> <li>– Permanent loss of 0.6 ha (6,000 m<sup>2</sup>) of private land belonging to the State<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>– Private state property</li> </ul>	Loss of pastoral use (permanent)
Total project footprint	269 ha		

## 2.5 Commitment to avoid and minimize displacement in the context of further project development

The Khobna photovoltaic power plant project was designed with a view to reducing social impacts, in accordance with international standards.

- **Site selection:** The site was selected from plots of land with no dwellings or permanent crops, with the explicit aim of avoiding any physical or economic displacement.
- **Permanent pastoral activities identified:** Seasonal grazing by local herders has been observed. These practices will be taken into account and will be the subject of consultation as well as appropriate compensation measures.

<sup>1</sup> Number of towers: 109 \* Tower surface area: 64m<sup>2</sup>

<sup>2</sup> Runway 1 km long \* 6 meters wide

- 
- **Use of existing infrastructure:** The project favors connecting to an existing track, thus avoiding a new permanent right-of-way.

### 3 LEGAL FRAMEWORK AND ANALYSIS OF DISCREPANCIES

#### 3.1 *Land status and types in Tunisia*

Four land statuses coexist in Tunisia and concern:

##### 3.1.1 Private land:

Private land belongs to individuals who exercise full ownership rights over it. Private land can be divided into:

- **Land subject to land titles and registered in the land register:** (Land Law of July 1, 1885, revised by the Code of Real Rights subject to the law of February 12, 1965, and the texts that amended it). The land title provides complete protection against any type of usurpation or illegal appropriation of land. Only half of the land in Tunisia is registered. This may be due to a lack of knowledge of the procedure and/or the high costs and long delays involved in registration. Nearly 60% of the titles registered in the Land Registry are not up to date, as titled land is often subject to transfers of ownership (inheritance, sale, or donation) that are not registered. The owner and/or occupant of a piece of land may therefore sometimes be different from the person named in the title.
- **Land subject to notarial deeds:** land whose ownership documents are notarial deeds. This land is not registered in the Land Registry and is therefore less well protected legally.
- **Land subject to certificates of possession:** The certificate of possession is an administrative document issued to farmers who work untitled agricultural land. This certificate is issued at the request of a farmer who can demonstrate "peaceful, public, continuous, uninterrupted, and unequivocal" possession of agricultural land for five consecutive years. This document allows the farmer to receive agricultural credits and to assert a right of first refusal when registering the land.
- Land with no proof of ownership (customary land or other).

##### 3.1.2 Collective land

This is land governed by Law No. 64-28 of June 4, 1964, and the texts that amended it. This land is owned by tribes or ethnic communities and has traditionally been used collectively by these tribes and communities.

Law No. 64-28 of June 4, 1964, establishing the collective land regime, expressly recognized a right of ownership of the land for the benefit of the communities that exploit it. Each group

owning collective land constitutes a legal entity with civil personality in acts related to the administration and exploitation of its land (Article 4).

The group was represented by a management council composed of members elected by the community, as well as members appointed by the governor with an advisory role. The Management Council was responsible for allocating these lands to members of the community who farm them. Since 2011, several management boards have been dissolved as part of reforms undertaken by the Ministry of State Property and regional authorities, with the aim of restructuring and improving the management of collective lands. This process has mainly affected areas where governance difficulties or development projects have been identified.

State supervision of collective land is exercised under the authority of the Minister of State Property and Land Affairs. The private allocation of collective land is done by decree. Allottees receive collective land allocation extracts.

A significant change has transformed nearly half of this communal land into individual plots with property rights, mainly affecting land used for tree or cereal cultivation. Some plots may also be specifically allocated to development projects (e.g., energy projects) without changing the communal status of the other plots.

Collective land used for pastoral purposes can be farmed communally but falls under the forestry regime and is therefore governed by the Forest Code.

### 3.1.3 State-owned land

This land is part of the public and private domain of the State and is managed by the Ministry of State Property and Land Affairs. There are two types of state-owned land:

- **State Public Domain:** As part of the public domain, these assets belong to a public entity and are allocated for public use, such as the Public Water Domain (DPH), the Public Road Domain (DPR), the Public Railway Domain (DPCF), the Forest Domain, etc.

**Private State Property:** Land belonging to the private State domain is managed by the Ministry of State Property and Land Affairs. This land belongs to the State, which develops it using various strategies such as allocation, leasing, or usufruct granted to the Office of State Lands (OTD), public institutions, young farmers or agricultural technicians, or Agricultural Development and Promotion Companies (SDMVA), etc.

### 3.1.4 Types of agricultural land

The management of agricultural land is governed by Law No. 83-8 of November 11, 1983, and Law 96-104 amending Law 83-8 of November 11, 1983.

Agricultural land is defined as all land with physical potential and used or capable of being used for agricultural, forestry, or pastoral production, as well as land classified as such by duly approved development plans in urban, tourist, or industrial areas.

Law No. 83-8 of November 11, 1983, on the protection of agricultural land, amended by Law 96-104, divides agricultural land into three categories: **prohibited areas**, **protected areas**, and **other agricultural areas**.

- **Prohibited areas:** these cover agricultural land intended to remain as such and include public irrigated areas, forest land belonging to the State forest domain, and land subject to the forest regime within the meaning of the Forest Code, with the exception of grazing land. In these zones, changes to the use of agricultural land may only be made within the framework of the specific laws governing them.
- **Protected areas:** cover land whose agricultural use must be protected because of its impact on national agricultural production. They cover:
  - Land irrigated by hydraulic structures built by the State or any public or semi-public body and not included in the public irrigation areas provided for in Article 4 of this law;
  - Land necessary for the extension or planned creation of irrigated areas from structures built by the State or any public or semi-public body;
  - Oases;
  - Land irrigated by structures built by private individuals or legal entities;
  - Olive groves and large plantations established as part of national or regional projects;
  - Areas predominantly used for fruit growing;
  - Land with significant agricultural potential, particularly due to the existence of exploitable groundwater or the fertility of its soil;
  - Forests not subject to forestry regulations and created as part of national or regional projects;
  - Developed grazing land.

The protected areas are determined for each governorate by decree issued on the recommendation of the Minister of Agriculture and after consultation with the regional technical advisory committee on agricultural land. A regional technical advisory committee on agricultural land is established in each governorate, responsible in



particular for proposing the protected areas referred to in Article 6 of this law and for giving its opinion on any request to change the use of agricultural land.

- **Other agricultural areas:** these cover all agricultural land not included in the prohibition and protection areas provided for by the law on the protection of agricultural land. Any change in the use of land included in these areas is subject to prior authorization by the Minister of Agriculture, issued by decree.

According to Article 9 of Law 96-104, the specific characteristics of each zone and its agricultural land requirements shall be taken into account in order to develop agricultural production while organizing its coexistence with non-agricultural activities, namely:

- When extending municipal boundaries or creating new municipalities;
- When drawing up or modifying urban development master plans, urban development plans, detailed development plans, conservation plans, protection and enhancement plans;
- When delimiting land intervention perimeters and land reserve perimeters; and
- When creating urban, industrial, or tourist developments.

In addition, any new urban, industrial, or tourist development shall be located on the least fertile land. Industrial, commercial, or service facilities not related to agricultural operations may not be located on agricultural land. Any change in their intended use may only take place under the conditions set out in Law No. 83-8 of November 11, 1983, and Law 96-104 amending Law 83-8 of November 11, 1983.

### ***3.2 Legal context of property and resettlement process under Tunisian law***

#### **3.2.1 Property rights in Tunisian legislation**

Article 41 of the Tunisian Constitution of 2014 states that "the right to property is guaranteed and may only be infringed in the cases and with the guarantees provided for by law."

#### **3.2.2 Amicable mechanisms: acquisition, donation, and exchange of plots**

In general, voluntary transfer/ donation and amicable acquisition are widely practiced. However, Tunisian law also provides for the possibility of exchanging plots of land.

##### ***3.2.2.1 Amicable acquisition***

Provided that the owner of the required land agrees to the applicant's requests before becoming the expropriating party, and that the applicant agrees to the owner's requests. The parties then agree on the price and terms of transfer of ownership and draw up a contract of sale. The amicable acquisition results in a contract of sale governed by civil law (Code of Obligations and Contracts



and the Code of Real Rights). It specifies the sale price and the transfer of ownership.

#### 3.2.2.2 *Transfer or donation free of charge*

This legal tool allows ownership of a property to be transferred from the transferor to the transferee free of charge. The owner of the property will voluntarily transfer part or all of it. This act will result in a transfer contract in the form of a notarized deed. As with acquisition, it will be governed by Tunisian civil law.

#### 3.2.2.3 *Exchange of plots or exchange in kind*

Law No. 95-21 of February 13, 1995, relating to state-owned agricultural land, provided for the transfer of state-owned land to the administration for the purposes of regularization and exchange. The law states that, if necessary, state-owned agricultural land may be transferred in exchange for land belonging to private individuals or local authorities. to the courts and agrees with the administration to exchange their property for another piece of state-owned land.

### 3.2.3 **Regulatory framework and national process for expropriation for public use**

Expropriation is governed by Law No. 2016/53 of July 11, 2016, on expropriation for public use, which sets out the principles, rules, and administrative and judicial procedures for expropriation in Tunisia.

The law is supported by its implementing texts:

- Government Decree No. 2017-332 of February 28, 2017, establishing the composition and functioning of the national commission responsible for setting the criteria for determining the financial value of real estate necessary for the implementation of public projects, their components, and the procedures for their revision and updating;
- The order of the head of government of March 1, 2017, setting the value of real estate acquisitions for the benefit of the State subject to the authorization of the head of government,
- The decree of the head of government of March 13, 2017, establishing the documents required for expropriation for public use.

This law and its implementing texts, which form the new legal framework for land acquisition, compensation, conflict resolution, and appeal procedures, established:

- the basic principles of expropriation,
- the purpose of expropriation,

- the procedures and bodies responsible for expropriation,
- the method of determining compensation and its payment.

It also enshrined the principle of retroactivity of the law by applying some of its provisions to expropriations carried out under the previous laws of 1976 and 2003, especially in the case of expropriation of collective land.

The 2016 law took corrective measures to bring it more into line with international standards and policies. As a result, this law established the principles, rules, and administrative and legal procedures for the expropriation of property for the purpose of carrying out projects or programs of public utility. This new legal framework emphasized the need **to inform the public about the intention to expropriate and to register objections through the Commission for Acquisitions for Public Projects (CAPPP)**, established in each of Tunisia's 24 governorates.

According to the regulations, Article 4 of Law No. 2016-53 of July 11, 2016, describes all properties that may be subject to expropriation, including:

- Buildings and land within the perimeter of the planned works;
- All those necessary to ensure the value of these works or to enable the rational execution of the approved development plan;
- Vacant land, planted land, and insufficiently built land containing dilapidated buildings that are dangerous, in ruins, or recognized as unfit for habitation.

Government Decree No. 2017-332 of February 28, 2017 establishes the composition and functioning of the national commission responsible for setting the criteria for determining the financial value of the property necessary for the implementation of public projects. This national commission, chaired by the Ministry of State Property, sets the criteria adopted in determining the financial value of the property necessary for the implementation of public projects and their components, and the procedures for reviewing and updating these criteria every five years and as needed.

Expropriation shall only be used in exceptional circumstances and after all the conciliation measures provided for by law have been exhausted. In the event of agreement between the parties, the expropriation procedure is halted and replaced by an amicable settlement. A sales contract will be drawn up. Failing this, and in the event of persistent disagreement, the expropriation decree is promulgated.

The main principles governing the process of expropriation for public use are as follows:

- Expropriation for public use is exceptional and requires fair compensation and the

guarantees set out in Law No. 2016-53 of July 11, 2016.

- Expropriation for public use is pronounced by a government decree submitted to the administrative court for its opinion.
- The expropriation decree must indicate the nature of the property and the project to be carried out.

The main stages of the land acquisition process are as follows:

- Preparation of the land file by the OTC;
- Preparation of an expert report listing the assets and properties affected, the provisional compensation amount, and the list of persons affected (by the expert, or other expert);
- Submission of the land file and the expert report to the Governor, who forwards them to the Regional Acquisition and Limitation Commission (CAPP);
- The regional acquisition commission publishes the intention to expropriate for sixty days at the governorate headquarters, the regional state property department, the delegation, and the municipalities;
- Complaints may be lodged during this period (60 days) with the CAPP;
- The CAPP orders the STEG to instruct the OTC or surveyors to draw up the final subdivision plans for the properties for which partial expropriation is envisaged and the final plans for unregistered properties;
- The acquisition commission records in the investigation register the identity of any person who has accepted the administration's offer and prepares the necessary files for the conclusion of contracts;
- Publication of the expropriation decree for one month by the Governor at the headquarters of the Governorate and the delegation, with publication in the print and audio media;
- If, after this period, no notification of dispute has been received, compensation shall be paid to the presumed owners;
- The Governor issues a certificate of posting. After this date, if the owners are not satisfied, they may have their dispute settled by the competent court.

Previously, and in accordance with the regulations in force before 2022, the State could proceed with resettlement if the expropriation decree was issued, subject to compliance with the 2016 law and the allocation of the compensation budget, even without the formal acceptance of the PAPs. This principle was reinforced by Decree-Law No. 2022-65 of October 19, 2022. This text amends

Law No. 2016-53 and introduces a clearer procedure for recognition, assessment, and conciliation via a specialized commission, called the Recognition and Conciliation Commission. These commissions are created in each governorate to facilitate the recognition of rights and conciliation between the parties.

### 3.2.4 Institutional framework for resettlement

The entities involved in the resettlement process in Tunisia are:

**The Ministry of State Property and Land Affairs:** It ensures the control, management, and use of movable and immovable property belonging to the state, the design of state policy relating to public and private property, and also the acquisition and expropriation of real estate for the benefit of the state and public administrative institutions at their request, in collaboration with the relevant ministries.

**The Agricultural Land Agency (AFA):** This is the only public body authorized to carry out land readjustment operations in agricultural areas in addition to its land consolidation operations. The AFA provides advice on real estate transactions in its areas of intervention. The agency is under the supervision of the Ministry of Agriculture.

**The Office of Topography and Cadastre (OTC):** It is responsible for the following activities:

- carrying out the work necessary to ensure the establishment and maintenance of a geodetic network and a precision leveling network throughout the national territory;
- carrying out and supervising the technical work involved in registering land ownership and the cadastre;
- delimiting public lands and domains, as well as administrative districts;
- carrying out land subdivision and co-ownership work;
- ensure the restoration of property boundaries;
- Carry out various topographical work;
- take aerial photographs and draw up large-scale topographical maps.

**The Governor:** Chairs the Acquisition Commission for public projects, public information and notification, and monitoring of the resettlement process through to expropriation.

**The Regional Development Commission (CRDA):** This is under the supervision of the Ministry of Agriculture. Each governorate has its own CRDA. The CRDA is responsible for implementing the agricultural policy decided by the government within the governorate. The CRDA may participate in assessing damage to crops and other damage to trees.

**The Commission for Acquisitions for Public Projects (CAPPP):** The Commission for

Acquisitions for Public Projects (CAPPP): Article 16 of Law 2016-53 stipulates that "a permanent administrative commission called the 'Commission for Acquisitions for Public Projects' shall be established in each governorate, chaired by the governor or his representative, to carry out all preliminary procedures for proposing

This CAPPP is therefore responsible for carrying out all preliminary procedures for expropriation, including "ordering the party concerned by the project to instruct the topography and cadastre office or surveyors to draw up the final subdivision plans for the buildings to be partially expropriated and the final plans for unregistered buildings " and "to publicize the intention to expropriate" in accordance with Article 19 of the same law.

**The Real Estate Court:** A real estate court is established in each region to rule on matters relating to:

- Optional land registration at the request of individuals and mandatory registration through cadastral surveys throughout the territory of the Republic,
- Updating of land titles,
- Requests for review and correction of judgments,
- Appeals against the decisions of regional commissions

### ***3.3 EBRD policy and environmental and social performance requirements applicable to the project***

The Bank has adopted an environmental and social policy, "PES 2024," which covers the environmental and social dimensions of sustainable development.

Under this policy, the social dimension concerns:

- Employment standards and working conditions, including health and safety, and
- Impact on populations, particularly in the areas of public health, safety and security, gender equality, impact on indigenous peoples and cultural heritage, involuntary resettlement, and affordability of basic services.

Through this policy, the Bank can make environmental and social considerations a priority in all its activities and set environmental and social performance targets for its clients that they are required to meet within a timeframe acceptable to the Bank. The respective responsibilities and roles of the EBRD and its clients in achieving sustainable results in line with this Policy and its Performance Requirements must be clearly defined.

To help clients and their projects meet these requirements, the EBRD has adopted 10 Environmental and Social s (ESIs) covering the following areas:

- **EESES 1 - Assessment and management of environmental and social impacts and issues**
- **EESES 2 - Employment and working conditions**
- **EESES 3 - Resource efficiency, pollution prevention, and control**
- **EESES 4 - Health, safety, and security**
- **ESIA 5 - Land acquisition, land use restrictions, and involuntary resettlement**
- **EESES 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**
- **EESES 7 - Indigenous peoples**
- **EESES 8 - Cultural Heritage**
- **EESES 9 - Financial intermediaries**
- **EESES 10 - Stakeholder engagement**

In preparing this Resettlement and Livelihood Restoration Framework (R-LRF), the EIA triggered are EES1, EESES5, and EESES10 as specified in the EBRD's Environmental and Social Policy (2024).

### **3.3.1 ES 1 - Assessment and management of environmental and social impacts and issues**

The standard requires the identification of the scope of influence of projects and specifies the client's responsibilities for assessing, managing, and monitoring the environmental and social aspects associated with projects submitted for financing to the EBRD. Stakeholder participation is part of this process. The Bank's requirements regarding this commitment are detailed in EESES 10.

Environmental and social issues and their impact must be assessed in the context of the project's area of influence. The assessment serves to identify environmental and social issues related to the project and to evaluate their impact, both negative and positive. Subsequently, measures should be adopted to avoid or, failing that, minimize and mitigate or even offset any negative impact on the workforce, communities, and the environment. Opportunities should be identified and, where possible, measures adopted to improve environmental and social performance; and the improvement of environmental and social performance should be promoted through a dynamic process of performance monitoring and evaluation.

identified environmental and social issues and their impact and to identify opportunities for improvement, in the form of an Environmental and Social Action Plan (ESAP).

The client shall establish procedures to monitor and evaluate compliance with the environmental

and social requirements stipulated in legal agreements; in particular, it shall ensure the effective implementation of the ESAP and the EP and improvements made with regard to the benchmark established during the assessment.

### 3.3.2 EP 5

"Involuntary resettlement" covers both physical displacement (relocation or loss of housing) and economic displacement (loss of assets or access to assets resulting in a loss of income or livelihood) as a result of land acquisition or restrictions on access to natural resources in connection with a project.

The client explores all possible project design alternatives to avoid or at least limit physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits.

After all relevant information has been disclosed, the client consults with affected individuals and communities, including host communities, and facilitates their early and informed participation in decision-making processes related to resettlement, in accordance with SSEIS 10. The client establishes a grievance resolution mechanism in accordance with EESES 10 as early as possible in the project development phase, in accordance with this EESES, to collect and address in a timely manner specific concerns of displaced persons or members of host communities regarding compensation and resettlement, including an appeals mechanism for the impartial resolution of disputes.

Where involuntary resettlement is unavoidable, the client shall engage a specialist with the necessary skills to conduct a census and assessment of basic socio-economic data in a specific area affected by the project and assist in the preparation of the Resettlement Action Plan or Livelihoods Recovery Plan.

Based on the environmental and social assessment, the client shall develop a Resettlement Action Plan (RAP) that, at a minimum, must cover the applicable requirements of this EP, regardless of the number of people affected.

The RAP must specifically take into account any individuals or groups who may be disadvantaged or vulnerable. In particular, it must include measures to ensure that women-**full replacement** cost and any other form of assistance that may help them improve or at least restore their living conditions or livelihoods, as provided for in this ESIA.

According to this EESES, the project should pay particular attention to the rights of vulnerable groups in all the measures, practices, programs, and activities it develops and implements.



### 3.3.3 EESES 10 - Disclosure of Information and Stakeholder Engagement

The EBRD considers stakeholder engagement to be an essential part of good business practice and corporate citizenship, as well as a means of improving project quality. In particular, community engagement is essential not only for the successful management of risks and impacts on communities affected by projects, but also for securing additional benefits for those communities.

### 3.4 *The IFC Sustainability Framework and project-specific standards*

The IFC Sustainability Framework sets out the Corporation's strategic commitment to promoting sustainable development and is an integral part of the institution's approach to managing risk. The Framework consists of the Environmental and Social Sustainability Policy, the corresponding Performance Standards, and the IFC Access to Information Policy.

The Environmental and Social Sustainability Policy describes IFC's commitments, roles, and responsibilities in this area. The Access to Information Policy represents IFC's commitment to promoting transparency and good governance in its operations and sets out the conditions for disclosure of information relating to its investments and advisory services.

to help them avoid, mitigate, and manage risks and impacts so that they can operate sustainably:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labor and Working Conditions
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community health, safety, and security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage

In preparing this Resettlement and Livelihood Restoration Framework (R-LRF), the triggered NPs are NP1 and NP5.

#### 3.4.1 **Performance Standard 1: Environmental and Social Risk and Impact Assessment and Management**

Establish and maintain a process for identifying project-related E&S risks and impacts, in accordance with international best practices.



Ensure that the process for identifying risks and impacts:

- is based on recent E&S baseline data at an appropriate level of detail;
- considers all E&S risks and impacts of the project, including those from NP2 to NP8, and those likely to be affected by such risks and impacts (including individuals/groups considered disadvantaged or vulnerable) and supplements these with rights due diligence in high-risk circumstances;
- takes into account greenhouse gas emissions, risks associated with climate change (and adaptation opportunities)

Analyze risks and impacts in the context of the project's area of influence, including:

- the area likely to be affected by:
- the project and related facilities that the client and its contractors develop or control; unforeseen but foreseeable developments caused by the project that may occur later or at another location;
- indirect impacts of the project on biodiversity or ecosystem services.
- associated facilities not funded under this project, whose viability and existence depend exclusively on the project and are essential to the proper functioning of the project;
- Areas potentially affected by cumulative impacts from the planned development of the project, any existing projects or conditions, and other developments related to the project.

Identify individuals and groups directly and differently or disproportionately affected by the project due to their disadvantaged or vulnerable status and implement differentiated measures to ensure that they are not disproportionately affected or disadvantaged in terms of benefits and opportunities.

Establish E&S action plans defining desired outcomes in the form of measurable actions with performance indicators, targets, and acceptable criteria that can be monitored over defined periods, with estimates of resources and responsibilities for implementation.

Plans should recognize the role of third parties and should be adaptable to changing circumstances, unforeseen events, and the results of monitoring and review.

Establish, maintain, and strengthen, as appropriate, an organizational structure that defines roles and responsibilities and the authority to implement the ESMS.

Specific personnel with clearly defined responsibilities and powers should be designated.

Key social and environmental responsibilities should be well defined and communicated to relevant personnel and the rest of the organization.

Sufficient management support and human and financial resources will be provided on an ongoing basis to achieve the desired results.

Establish procedures to monitor and measure the effectiveness of the management program and compliance with legal/contractual obligations and regulatory requirements. Include representatives of affected communities in monitoring activities (where appropriate). Use qualified external experts to verify monitoring information.

Identify stakeholders, including affected communities, and consider communication operations. Develop and implement a PEPP tailored to the characteristics and interests of affected communities. Include differentiated measures to enable effective participation by individuals identified as disadvantaged or vulnerable. Where the process relies on community representatives, verify that they represent the views of the community and can be used to communicate the results to constituents.

Undertake a consultation process that provides affected communities with opportunities to express their views on the risks, impacts, and mitigation measures of the project. The client will consider and respond to these. Ensure that consultation is a two-way process that:

- Begins early in the assessment process and continues on an ongoing basis;
- Is based on prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a culturally appropriate local context;
- Language(s) and format and is understandable to affected communities;
- Is inclusive of those directly affected;
- Is free from external manipulation, interference, coercion, and intimidation;
- Allows for meaningful participation; and Is documented.

Establish a grievance mechanism to receive and facilitate the resolution of concerns from affected communities regarding the environmental and social performance of the project. Concerns will be addressed promptly, using a consultation process that is understandable and transparent, culturally appropriate and easily accessible, free of charge and without retribution. This will not preclude access to judicial or administrative remedies. Communities will be informed of the mechanism as part of the stakeholder engagement process.

### **3.4.2 Performance Standard 5: Land Acquisition and Involuntary Resettlement**

PS 5 applies to physical and/or economic displacement resulting from the following types of land-related operations:

- Land rights or land use rights acquired through expropriation or other compulsory procedures in accordance with the legal system of the host country;
- 
- Project situations where involuntary restrictions on land use and access to natural resources prevent a community or groups within a community from losing access to the use of resources where they have traditional or recognizable rights of use;
- Certain project situations requiring the removal of persons occupying land without formal, traditional, or recognized rights of use; or
- Restriction of access to land or use of other resources, including communal property and natural resources such as marine and aquatic resources, wood and non-wood forest products, freshwater, medicinal plants, hunting and gathering lands and pastures and cultivation areas.

When displacement cannot be avoided, provide displaced communities and individuals with compensation for lost assets at full replacement cost and other assistance.

Transparent and consistent compensation standards should be offered to all communities and individuals affected by displacement.

Where possible, offer land-based compensation to those whose livelihoods are based on the land and who are displaced from the land.

Possession of acquired land and related assets will only take place after compensation has been made available and, where applicable, resettlement sites and relocation allowances have been provided in addition to compensation.

Provide opportunities for displaced communities and individuals to derive appropriate development.

Establish a grievance mechanism compatible with NP1 as early as possible in the project development phase. The grievance mechanism should be designed to address specific concerns regarding compensation and resettlement raised by displaced persons or community members, including an appeal mechanism to resolve disputes impartially.

In the event of physical displacement, develop a PAR covering at least the applicable requirements of this NP

The plan shall be designed to mitigate the negative impacts of displacement; identify development opportunities; develop a budget and resettlement schedule; and establish the rights of all categories of affected persons (including host communities).

Special attention will be given to the needs of the poor and vulnerable.

All land acquisition transactions, as well as compensation measures and resettlement activities, will be documented.

In the case of projects involving only economic displacement, identify and describe the measures that the responsible government agency plans to use to compensate affected communities and individuals.

- If these measures do not meet the relevant requirements of this SP, develop an environmental and social action plan to supplement the government's action.
- This may include additional compensation for lost property and additional efforts to restore lost livelihoods, where appropriate.

### **3.5 EIB Environmental and Social Standards**

The European Investment Bank (EIB) has established a framework to ensure that its financing supports sustainable, inclusive development that respects human rights. This framework is based on 11 Environmental and Social Standards (ESS) that define the requirements applicable to project promoters throughout the project lifecycle.

- Standard 1: Environmental and social impacts and risks
- Standard 2: Stakeholder Engagement
- Standard 3: Resource Efficiency and Pollution Prevention
- Standard 4: Biodiversity and Ecosystems
- Standard 5: Climate Change
- Standard 6: Involuntary resettlement
- Standard 7: Vulnerable groups, indigenous peoples, and gender dimension
- Standard 8: Employment and working conditions
- Standard 9: Health, Safety, and Security
- Standard 10: Cultural Heritage
- Standard 11: Intermediated financing

In the context of this project, the applicable SSNs are SSN 1 and SSN 6.

#### **3.5.1 Environmental and Social Standard 1: Environmental and Social Impacts and Risks**

This requires a comprehensive and rigorous assessment of environmental, climate, social, and

human rights risks and impacts. The promoter must demonstrate that it identifies, manages, monitors, and communicates these risks, and that it implements appropriate measures to maximize positive impacts while limiting negative effects at all stages of the project.

### 3.5.2 Environmental and Social Standard 6: Involuntary Resettlement

This standard aims to avoid or minimize the physical and/or economic displacement of people. When displacement is unavoidable, it requires the implementation of fair compensation measures and the restoration, or even improvement, of the living conditions of the affected populations. A resettlement plan or livelihood restoration plan must be established as appropriate.

## 3.6 Gap Analysis

Table2 : Convergence and divergence between the Bank's procedures and policies and Tunisian resettlement regulations

Themes	Tunisian national legislation (2016 expropriation law and 1922 temporary occupation law)	International standards (EP5, NP5, NES6)	Proposed action
<b>Eligibility criteria for compensation</b>	<ul style="list-style-type: none"> <li>• Holders of formal title deeds</li> <li>• Property recognized by local leaders (elected sector leader)</li> <li>• Collective ownership recognized by regional councils</li> <li>• Loss of crops</li> </ul>	<ul style="list-style-type: none"> <li>• Holders of formal land rights (including customary and traditional rights recognized by national legislation),</li> <li>• Those who do not have formal rights to the land at the time the census begins, but who may obtain land titles or other rights at a later date</li> <li>• Those who have neither formal rights nor titles that are likely to be recognized on the land they occupy (the case of bona fide occupation of land belonging to others).</li> </ul>	<p>In the case of discrepancy, EES 5 must be applied.</p> <p>Any loss of income sources and access to the resource must be subject to compensated.</p> <p>Informal users ("squatters") will be eligible for compensation under this project. This will be taken into account in the compensation matrix</p>

Themes	Tunisian national legislation (2016 expropriation law and 1922 temporary occupation law)	International standards (EP5, NP5, NES6)	Proposed action
<b>Property eligible for compensation</b>	<ul style="list-style-type: none"> <li>The construction of transmission lines requires the temporary occupation of land</li> </ul>	<ul style="list-style-type: none"> <li>Land that is permanently lost (i.e., tower sites) must be compensated as such (i.e., acquired by the project).</li> </ul>	QAIR compensates for land losses at market value and signs a permanent easement agreement.
<b>Socio-economic profile</b>	<ul style="list-style-type: none"> <li>A socio-economic survey of the people affected is not required by Tunisian law</li> </ul>	<ul style="list-style-type: none"> <li>The resettlement plan requires a socio-economic survey of affected persons</li> </ul>	The procedures for implementing resettlement plans proposed in this CPR include conducting a socio-economic survey of the persons affected.
<b>Vulnerable groups</b>	<p>No specific action for affected populations considered vulnerable.</p> <ul style="list-style-type: none"> <li>Social framework</li> </ul>	<ul style="list-style-type: none"> <li>Eligible for additional assistance from the resettlement budget. A socio-economic survey identifying vulnerable PAPs is required.</li> </ul>	<p>SEA 5 must apply. The project must identify vulnerable groups and their needs and provide targeted assistance for these vulnerable populations.</p> <p>This will be taken into account in the compensation matrix and the procedures for preparing the entire compensation operation. In addition, targeted consultations with vulnerable groups will be conducted and specific funds will be provided for in the resettlement budget to finance appropriate compensation.</p>

Themes	Tunisian national legislation (2016 expropriation law and 1922 temporary occupation law)	International standards (EP5, NP5, NES6)	Proposed action
Total or partial loss of livelihoods	<ul style="list-style-type: none"> <li>Not addressed by legislation. Compensation for crops is estimated by experts based on the current market without calculating the time needed to restore these incomes.</li> </ul>	<ul style="list-style-type: none"> <li>Consider a plan to restore livelihoods.</li> </ul>	Application of SEA 5.5 is required: Aim to improve, or at least restore, the living conditions and livelihoods of affected people. This is taken into account in the compensation matrix.
Compensation	<ul style="list-style-type: none"> <li>Monetary compensation is offered.</li> </ul>	<ul style="list-style-type: none"> <li>The bank's policy favors compensation in kind but accepts monetary compensation if this is the preference of the PAPs.</li> </ul>	Monetary compensation is accepted if consultations prove that this is the preference of the PAPs. For land-dependent households, land compensation should be prioritized, unless it is unfeasible or refused. Compensation in kind is encouraged in all cases.
Deadline for occupants affected by the project	<ul style="list-style-type: none"> <li>Not specified</li> </ul>	<ul style="list-style-type: none"> <li>Planned</li> </ul>	The SEA 5 shall prevail: Provide for the publication of a deadline at the end of the census of persons and property in the event of physical displacement and access restrictions. This is included in the CPR principles of the CPR.
Execution of expropriation	<ul style="list-style-type: none"> <li>The State may proceed with resettlement if the expropriation decree has been issued, subject to compliance with the 2016 law and the allocation of the compensation budget, even without the formal acceptance of the PAPs. This principle was reinforced by Decree-Law No. 2022-65 of October 19, 2022. This text amends Law No. 2016-53 and introduces a clearer procedure for</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement can only take place after consultation with the PAPs, acceptance of the compensation budgets, and actual payment of compensation.</li> </ul>	The Bank's policy must be applied: losses must be identified, and compensation budgets must be discussed, accepted, and received by the PAPs before work begins.



Themes	Tunisian national legislation (2016 expropriation law and 1922 temporary occupation law)	International standards (EP5, NP5, NES6)	Proposed action
	recognition, assessment, and conciliation via a specialized commission.		
<b>Relocation assistance</b>	<ul style="list-style-type: none"> <li>Not provided</li> </ul>	<ul style="list-style-type: none"> <li>Planned</li> </ul>	EES 5 must be applied: provide a budget for resettlement assistance.
<b>Complaints management mechanism</b>	<p>Recourse to the Reconciliation Commission and the</p> <ul style="list-style-type: none"> <li>national judicial system if negotiations with the Reconciliation Commission fail.</li> </ul>	<p>Establishment of a</p> <ul style="list-style-type: none"> <li>"Complaints Management Mechanism" specific to the project, displayed and accessible to all PAPs.</li> </ul>	<p>The SEA 5 must prevail: A project-specific "Complaints Management Mechanism" must be prepared, posted, and accessible to all PAPs, incorporating an impartial appeal mechanism.</p> <p>Complaint Management Mechanism" specific to the project must be prepared, posted, and accessible to all PAPs, incorporating an impartial appeal mechanism.</p>
<b>Budget</b>	<ul style="list-style-type: none"> <li>Required, but no provision for travel assistance, assistance to vulnerable persons, and PAPs who are not eligible under national regulations.</li> </ul>	<ul style="list-style-type: none"> <li>The budget must be included in the overall project budget, with identification of budget sources.</li> </ul>	<p>EES 5 must prevail: The budget must include the cost of investments/acquisitions, implementation costs, monitoring and audit costs, and contingencies.</p>

Themes	Tunisian national legislation (2016 expropriation law and 1922 temporary occupation law)	International standards (EP5, NP5, NES6)	Proposed action
<b>Implementation schedule</b>	<ul style="list-style-type: none"> <li>Not required</li> </ul>	<p>A detailed implementation schedule for the resettlement plan is required. This schedule must be aligned with the project implementation schedule to ensure compliance</p> <ul style="list-style-type: none"> <li>with the Bank's policy.</li> </ul>	SEA 5 must prevail: A schedule for implementing the resettlement action plan must be prepared.
<b>Institutional arrangement for the implementation of a remediation plan</b>	<p>No specific arrangement is required. Generally, the expropriating authority's legal department works closely with all stakeholders involved.</p> <ul style="list-style-type: none"> <li>involved.</li> </ul>	<ul style="list-style-type: none"> <li>An institutional arrangement for implementation is required for all phases: preparation, implementation, monitoring &amp; evaluation, and audit.</li> </ul>	SEA 5 must prevail: the project must establish the structure or unit for implementing the resettlement plan.
<b>Monitoring &amp; evaluation</b>	<ul style="list-style-type: none"> <li>Not planned</li> </ul>	<ul style="list-style-type: none"> <li>A resettlement monitoring and evaluation plan must be prepared and implemented.</li> </ul>	PO 4.12 must prevail: a detailed monitoring plan must be prepared and implemented and included in the resettlement plans and provide for corrective measures if necessary to ensure compliance with SEA 5 during implementation.
<b>Consultations</b>	<ul style="list-style-type: none"> <li>Not formalized or documented</li> </ul>	<ul style="list-style-type: none"> <li>Requires regular and documented consultations throughout the project cycle</li> </ul>	The CPR provides guidelines on the information and consultation process to be followed when implementing resettlement plans, including the effective participation of PAPs and the documentation of all consultations.

## 4 PRINCIPLES, OBJECTIVES, AND PROCESSES

### 4.1 *Key principles and objectives*

The project aims to ensure compliance with international standards applicable to land acquisition, resettlement, and income restoration:

1. The project led by QAIR has avoided any form of forced displacement by operating the power plant on state-owned land through a concession agreement, which grants it the right to use the state-owned land for a period of 20 years to build and operate a solar power plant for the project.
2. An ESIA study is currently being prepared to identify, assess, and mitigate the negative social and economic impacts resulting from land acquisition or restrictions on its use by affected persons, ensuring appropriate communication of information and consultation and participation of project stakeholders.
3. Fair and negotiated compensation to improve or at least restore the livelihoods and standard of living of those affected.
4. The objective is to preserve the living conditions of the populations affected by the project and to ensure the restoration of their livelihoods.

#### 4.1.1 **Avoid forced evictions**

The project does not involve the forced eviction of residents or landowners: The land chosen for the project is uninhabited and belongs to the private domain of the State. The line does not pass through inhabited land.

#### 4.1.2 **Deadline and eligibility**

The initial deadline for this project is set **at one month after the publication of the** . This date is linked to the completion of field surveys conducted on the land components identified for the project, which is the subject of this LARF. Beyond this date, the occupation and/or exploitation of land or resources covered by the project will no longer be eligible for compensation. The census of PAPs on the project right-of-way will be carried out during the period when a decision is made to conduct a PAR. The deadline will be explained to the population during information and awareness-raising meetings and will be posted in the relevant delegations (Mezzouna and Meknassy) and at the Governorate of Sidi Bouzid.

#### **4.1.3 Compensation at replacement value, compensation in kind where possible**

Compensation for temporary rental or occupation is determined based on the value of the property on the date of the agreement between the owners and Qair. The amount of compensation applicable to real estate and real rights must correspond to the full replacement cost, including all costs necessary to replace the property and associated transaction costs, and may not exceed the most recent estimate appearing in the contracts relating to such real estate or real rights, unless this estimate is less than the full replacement cost, in which case Qair must supplement the amount to reach the full replacement cost.

The estimate shall be revised in line with the variation in construction costs between the reference date or date of the estimate and the date on which the compensation is set, as determined by the weighted index of the series of prices approved by government departments and experts in the field.

Natural or legal persons who lose sources of income (temporary or permanent) must be compensated and assisted in a timely manner, even before development and/or construction work begins.

The terms of payment for the various forms of compensation (in kind, cash, assistance) must be accepted by the persons affected. Economically displaced persons who do not have legally recognized land rights must be compensated for lost assets other than land, such as crops, irrigation infrastructure, and other developments, at their full replacement cost.

Compensation for loss of assets is provided at full replacement cost, without depreciation, thereby ensuring an improvement or, at the very least, the restoration of the livelihoods and standard of living of displaced persons. The principle is that, if not improved, the standard of living of the Project-Affected People should at least be restored.

#### **4.1.4 Restoration of livelihoods when they are affected**

When the impact on land may affect livelihoods, and even if physical relocation is not necessary, affected individuals and communities must be consulted and included in the planning process. Eligible and affected individuals must be assisted in their efforts to restore or improve their livelihoods.

To ensure that compensation and economic rehabilitation occur as planned, a monitoring/evaluation program to monitor the progress of project activities will be put in place.

#### **4.1.5 Consideration of vulnerable persons**

According to initial field surveys and literature reviews, vulnerable people likely to be affected by the project are defined as follows:

- Households below the poverty line (according to the official national definition)
- Single female heads of household,
- People with disabilities,
- Elderly people living alone,
- People with chronic illnesses,
- Families without support,
- Unemployed graduates,
- Unemployed people without training,
- As well as any other person who will be considered vulnerable in the following phases.

#### **4.1.6 Key principles for implementation and monitoring of resettlement**

The monitoring plan will set out the parameters for monitoring, establish benchmarks, and designate the individuals or institutions responsible for carrying out monitoring activities.

Arrangements for monitoring and evaluating resettlement and compensation activities will be part of the overall monitoring program for all QAIR activities, which the various implementing partners are responsible for implementing.

Monitoring and evaluation will be organized at three levels: (i) internal monitoring by Qair, (ii) monitoring of the implementation of resettlement and livelihood restoration by the implementing partners, and (iii) independent monitoring by a third party, including closing reporting.

The implementing partners, with the support of the Project's Environmental and Social Safeguard Policy Monitors, will establish an administrative reporting system to:

- Alert project authorities to the need to acquire land and the acquisition procedures necessary for project activities, and the need to incorporate land acquisition, resettlement, loss of goods/services, and livelihood impacts
- Provide adequate information on the assessment and negotiation procedure.
- Maintain records of all complaints that need to be resolved.
- Document the fulfillment of all project resettlement obligations (i.e., payment of agreed-upon amounts, construction of new structures, etc.) for all temporary or permanent losses, as well as any additional unplanned construction damage.
- Keep the database up to date on changes in the field during the implementation of

resettlement and compensation activities.

Periodic assessments will be carried out to determine whether PAPs have been fully paid or compensated before project activities are implemented, and whether they enjoy a standard of living equal to or higher than that which they had previously.

This framework suggests that the monitoring and evaluation mechanism also includes local actors, particularly municipal administrators, as stakeholders in this activity. Municipalities will therefore be mandated to independently monitor the implementation of resettlement and compensation plans.

## 4.2 *Overview of the process*

### 4.2.1 Negotiated settlements

#### ➤ CPR compensation principle, process, and matrix

Based on a comparative analysis of government provisions and the involuntary resettlement standards of international financial institutions (EBRD, EIB, and IFC), the CPR proposes to adopt the following guidelines, definitions, principles, compensation matrix, and process for the project.

- **Principles**

- The Project will attempt to minimize displacement or resettlement by applying the following principles:
- The cost of acquiring or compensating for land and its compensation will be included in the cost estimate for sub-projects, to enable a full assessment.
- To the extent technically feasible, towers and substations will be located on public land or existing, vacant rights-of-way.
- Affected communities will be consulted and involved in the planning and assessment process.
- Eligible and affected persons must be assisted in their efforts to restore or improve their livelihoods.
- Individuals or legal entities who lose sources of income (temporary or permanent) must be compensated and assisted before any relocation, and before the start of development and/or construction work.

- **Eligibility criteria**

The CATR will follow the following eligibility principles in accordance with international norms and standards for Involuntary Resettlement:

- a) Holders of formal rights to land (including customary and traditional rights

recognized by the country's legislation);

b) Those who do not have formal rights to the land at the time the census begins, but who have land titles or other titles – provided that such titles are recognized by the country's laws or can be recognized through a process identified in the resettlement plan

c) Those who have neither formal rights nor titles that are likely to be recognized on the land they occupy.

In the context of this project, the people most likely to be affected are:

- Private and state owners of land that will be transferred to the project for the installation of the power plant, road access, and power transmission line.
- Landowners (private, public, or collective) who will suffer damage to their land, interruption of access to their land, and damage to crops.
- Farmers (whether or not they are landowners) who will see their crops damaged by the construction and maintenance work.
- Livestock farmers who will be deprived of access to grazing areas or who will see their tents and equipment damaged by the works.
- Agricultural workers who will lose their income temporarily or permanently.
- economic activities (small businesses, transport, etc.) permanently or temporarily.

- **Methodology for calculating compensation**

The compensation rate will comply with replacement cost principles as defined by international standards (EBRD, EIB, IFC).

For **agricultural land**, the replacement rate represents:

- (i) The market value, prior to the project, of nearby land with similar production and use potential to the affected land;
- (ii) The cost of preparing the land for cultivation; and
- (iii) The cost of any registration and transfer fees.

For **land located in urban areas**, the compensation cost represents:

- (i) The pre-project market value of land of the same size and use, with similar or improved infrastructure and public services, located near the affected land, plus
- (ii) The cost of registration and transfer taxes.



For losses of access to services such as grazing, it is difficult to assess or compensate in monetary terms; the project must establish access to equivalent and culturally acceptable resources and sources of income.

Where national legislation does not provide for compensation at a level corresponding to the full replacement cost, compensation under national legislation will be supplemented by the project to bridge the gap with the current replacement cost.

#### **4.2.2 Procedure in the absence of agreement**

Under Tunisian law, if the owner of the required property agrees to the applicant's requests before becoming the expropriating authority, and the applicant agrees to the owner's requests, the transaction then loses its binding nature and expropriation is not pursued.

The parties then agree on the price and terms of transfer of ownership and draw up a contract of sale or lease.

The amicable acquisition results in a contract of sale or lease governed by civil law (Code of Obligations and Contracts and the Code of Real Rights). It specifies the amount of the sale or lease and the transfer of ownership.

Law No. 95-21 of February 13, 1995, relating to state-owned agricultural land, provided for the transfer of state-owned land to the administration for the purposes of regularization and exchange.

If there is still no agreement between the expropriating party and the expropriated party, the compensation for expropriation will be determined based on the value of the property as assessed according to its condition and actual use on the date of publication of the expropriation decree and by comparison with the prices charged on that date for comparable properties located in the same area.

In the absence of an amicable agreement in Tunisia, the law provides that the public authority may initiate legal proceedings to determine the compensation through a case before the competent court, without necessarily proceeding with immediate expropriation.

The Tunisian law of July 2016 recognized informal occupation and compensated for everything on the surface. According to the bank's PR 5 standard, informal occupants must be compensated for any loss of income and access to resources. Informal users ("squatters") will be eligible for compensation under this project.

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## 5 PROVISIONAL RESETTLEMENT AND COMPENSATION STRATEGY

### 5.1 *Initial approach to rights*

#### 5.1.1 Eligibility for compensation

3 : Category of eligible PAPs

Type of loss	Eligibility	Land situation	Compensation
<b>Permanent loss of land</b>	<ul style="list-style-type: none"> <li>– Owner of registered land</li> <li>– Owner of land in the process of being registered</li> <li>– Owner of land with a notarized deed</li> </ul>	<ul style="list-style-type: none"> <li>– Registered land;</li> <li>– Land in the process of being registered</li> <li>– Unregistered land with a notarized deed</li> <li>– Land with a certificate of possession, certificate of allocation, certificate of enzel</li> <li>– Unregistered land without documentation (following the application of Article 38 of Law No. 2016-53 of July 11, 2016).</li> </ul>	<ul style="list-style-type: none"> <li>– Full compensation equal to the replacement value (local market price plus registration fees (5%). Payment must be received by the PAP before any relocation. The market price is determined on the basis of the prices of neighboring land by the expert from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission.</li> <li>– Buildings of which part has been expropriated for public use will be acquired in their entirety if the owners so request in writing within one month of the date of notification of the provisional compensation value. The same applies to any land that has become unusable as a result of the expropriation (Art. 9).</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Where there is a dispute between presumed owners and another claimant, it is then up to the parties concerned to have their dispute settled by the competent court.	Registered land or land not belonging to others	– No compensation until the dispute has been resolved by the court. The unsuccessful informal occupant may be compensated within the regional social framework. Deposit of the amount.
<b>Permanent loss of income</b>	Owner-operator	Registered land belonging to a private owner.	– Compensation for crop loss based on current market value and with reference to the scale set by the national commission, which depends on the type, nature, species, age, productive life, etc. Compensation will take into account the time needed to return to pre-project levels of production or earnings.

Type of loss	Eligibility	Land situation	Compensation
	Agricultural land operator with a lease agreement.	Registered land belonging to a private owner.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value and with reference to the scale set by the national commission, which depends on their type, nature, species, age, productive life, etc. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
	Informal farmer	Registered land belonging to a private owner.	<ul style="list-style-type: none"> <li>– In practice, the administration is responsible, through and within the social framework, for compensating and providing the necessary assistance to the operator so that he can find an equivalent source of income. In practice, the social framework will also deal with compensating for trees at market price and by reference to the scale set by the national commission. During the final ex-post evaluation of the project, the situation of the affected farmers will be reviewed to ensure that they have been taken care of and compensated in a similar way to formal farmers.</li> </ul>
	Informal farmer	Cultivated land belonging to the state;	<ul style="list-style-type: none"> <li>– The replacement cost for crop losses will be assessed on the same basis as formal cases.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Agricultural operator with a lease agreement.	Land belonging to the state.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value and with reference to the scale set by the national commission, which depends on the type, nature, species, age, productive life, etc. of the crops, with the possibility of exchanging the lease for another plot of land. Compensation will take into account the time needed to return to pre-project levels of production or earnings. The State will take back its land without compensation for bare ownership.</li> </ul>
<b>Permanent loss of crops or loss of income from planned crops</b>	Farmer-owner	Registered land belonging to a private individual.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops. Market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission.</li> <li>– Compensation will take into account the time needed to return to pre-project levels of production or earnings.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Farmers with a lease agreement.	Registered land belonging to private individuals.	<ul style="list-style-type: none"> <li>– Compensation for crop losses based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission.</li> <li>– Compensation will take into account the time needed to return to production or income levels equivalent to pre-project levels. The provisions of Law No. 87-30 of August 12, 1987, regulating rural leases</li> <li>– must be taken into account.</li> </ul>



Type of loss	Eligibility	Land situation	Compensation
	Informal farmer	Registered land belonging to a private individual.	<ul style="list-style-type: none"> <li>– Compensation for crop losses based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops.</li> <li>– Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
	Informal farmer	Land belonging to the state;	<ul style="list-style-type: none"> <li>– Compensation for crop losses based on current market value, which depends on crop type, nature, species, age, productive life, etc.</li> <li>– Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Farmer of agricultural land with a lease agreement.	Cultivated land belonging to the state.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc., with the possibility of exchanging the lease for another plot of land. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
Permanent loss of trees or loss of income	Owner-operator	Registered land belonging to a private owner.	<ul style="list-style-type: none"> <li>– Compensation for the loss of trees based on current market value, which depends on their type, nature, species, age, productive life, etc. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
	Farmers with a lease agreement.	Registered land belonging to private individuals.	<ul style="list-style-type: none"> <li>– Compensation for the loss of trees based on current market value, which depends on their type, nature, species, age, productive life, etc. The market value will be determined by the Ministry of State Property expert or private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Informal operator	Registered land belonging to private individuals.	<ul style="list-style-type: none"> <li>- Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission.</li> <li>- Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
	Informal farmer	Cultivated land belonging to the state domain;	<ul style="list-style-type: none"> <li>- Compensation for trees at market price, which will be determined by the expert from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission.</li> <li>- Assistance to the farmer so that he or she can find an equivalent source of income or monetary compensation</li> </ul>
	Farmer of agricultural land with a lease agreement.	Cultivated land belonging to the state.	<ul style="list-style-type: none"> <li>- Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc., with the possibility of exchanging the lease for another plot of land. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or earnings.</li> </ul>
Buildings and structures			

Type of loss	Eligibility	Land situation	Compensation
<b>Residences or habitable structures</b>	Owner	– Residences located on registered land or on unregistered land with a title deed or other proof, or on land without any proof (after application of Article 38 of Law No. 2016-53 of July 11, 2016)	– Compensation for the loss of land and compensation for the market value of buildings and structures to be demolished, including contract registration fees and other costs assessed in the appraisal, such as moving expenses. This value will be determined by the expert from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission. This will also include assistance in finding alternative accommodation.
	Tenant	With a lease agreement	– Compensation for the tenant before the start of the work, including all moving costs. This will also include assistance in finding alternative accommodation.
	Occupant	Without a lease	– Compensation for the tenant with the owner's agreement before the start of the work, including all moving costs. Assistance will also be provided to help them find alternative accommodation. This will also include assistance in finding alternative accommodation.
	Informal occupant of a residence located on state property		– Compensation for the occupant before the start of the work, including all moving costs. This will also include assistance in finding alternative accommodation.

Type of loss	Eligibility	Land situation	Compensation
	Informal occupant of a residence located on privately registered land		– Compensation for the occupant before the start of work, including all moving costs. This will also include assistance in finding alternative accommodation.
	Informal occupant who has built a structure on land that does not belong to them.		– Compensation for the loss of the building before the start of work, including all moving costs. This will also include assistance in finding alternative accommodation.
<b>Buildings and structures</b>			
<b>Uninhabitable buildings and production facilities (garages, irrigation systems, fences, stables)</b>	Landowner	– Non-residential buildings located on land that is registered or unregistered with a title deed or any other proof of ownership, or on land without any proof (after application of Article 38 of Law No. 2016-53 of July 11, 2016)	– Compensation for the loss of land and compensation for the market value of buildings and structures to be demolished, including contract registration fees and other costs assessed in the appraisal, such as moving expenses. This will also include assistance in finding alternative housing.
	Tenant	With a lease	– Compensation for the loss of structures prior to the start of work, including all moving costs. This will also include assistance in finding alternative accommodation.

Type of loss	Eligibility	Land situation	Compensation
	Occupant	Without a lease	– Compensation for the loss of the building at market price through the regional commission before the start of work, including all moving costs. This will also include assistance in finding alternative accommodation.
	Informal occupant of a residence located on state property		– Compensation for the bona fide occupant for the loss of the building at market price before the start of work, including all moving costs, and after approval by the MDEAF. In practice, the MDEAF approves compensation when the informal occupant is acting in good faith. This will also include assistance in finding alternative accommodation.
	Informal occupant of a residence located on privately registered land		– Compensation for the loss of the building at market price before the start of construction, including all moving costs. This will also include assistance in finding alternative accommodation.
	Informal occupant who has built a structure on land that does not belong to them.		– Compensation for the loss of the building at market price after agreement with the real owner before the start of work, including all moving costs. This will also include assistance in finding alternative accommodation.
Loss of public infrastructure (sewerage, telecommunications, drinking water supply, etc.).			

Type of loss	Eligibility	Land situation	Compensation
<b>Loss of public infrastructure</b>	The State: the administration managing these public infrastructure facilities.	State property	<ul style="list-style-type: none"> <li>– Relocation and reconstruction of all these public losses.</li> </ul>
<b>Loss of income and livelihoods</b>			
<b>Permanent crops or loss of income from planned crops</b>	Farmer-owner	Registered land belonging to private individuals.	<ul style="list-style-type: none"> <li>– Compensation for crop losses based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops. Market value will be determined by experts from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission.</li> <li>– Compensation will take into account the time needed to return to pre-project levels of production or income .</li> </ul>



Type of loss	Eligibility	Land situation	Compensation
	Farmer of agricultural land with a lease agreement.	Registered land belonging to a private individual.	<ul style="list-style-type: none"> <li>– Compensation for crop losses based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops. Market value will be determined by experts from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission.</li> <li>– Compensation will take into account the time needed to return to pre-project levels of production or earnings. The provisions of Law No. 87-30 of August 12, 1987, regulating rural leases must be taken into account.</li> </ul>
	Informal farmer	Registered land belonging to a private individual.	<ul style="list-style-type: none"> <li>– Compensate and provide the necessary assistance to the farmer so that he or she can regain an equivalent source of income. The replacement cost for crop losses and a place of work/economic activity is covered through the social framework.</li> <li>– During the final ex-post evaluation of the PAR (for components that require PARs), the situation of the affected farmers will be reviewed to ensure that they have been adequately taken care of.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Informal farmer	Cultivated land belonging to the state domain;	– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, etc. of the crops, by experts from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission and after approval by the MDEAF.
	Farmer of agricultural land with a lease agreement.	Cultivated land belonging to the state.	– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, etc., by an expert from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission and after approval by the MDEAF.
<b>Loss of income and livelihood</b>			
<b>Trees</b>	Farmer-owner	Registered land belonging to private individuals.	– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc. of the crops. Market value will be determined by experts from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.

Type of loss	Eligibility	Land situation	Compensation
	Farmers with a lease agreement.	Registered land belonging to private individuals.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc. The market value will be determined by an expert from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
	Informal farmer	Registered land belonging to a private individual.	<ul style="list-style-type: none"> <li>– In practice, the administration is responsible, within the social framework, for compensating and providing the necessary assistance to the farmer so that he or she can regain an equivalent income.</li> <li>– During the final ex-post evaluation of the PAR, the situation of the affected operators will be reviewed to ensure that they have been adequately taken care of.</li> </ul>
	Informal farmer	Cultivated land belonging to the state;	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, etc. of the crops, is paid by experts from the Ministry of State Property or private experts in accordance with a set of criteria established by a national commission and after approval by the SEDEAF. In practice, the SEDEAF approves compensation when the informal farmer is acting in good faith.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
	Farmer of agricultural land with a lease agreement.	Cultivated land belonging to the state.	<ul style="list-style-type: none"> <li>– Compensation for crop loss based on current market value, which depends on the type, nature, species, age, productive life, etc., with the possibility of exchanging the lease for another plot of land. The market value will be determined by an expert from the Ministry of State Property or by private experts in accordance with a set of criteria established by a national commission. Compensation will take into account the time needed to return to pre-project levels of production or income.</li> </ul>
<b>Loss of income and livelihoods</b>			
<b>Work/Employment</b>	Business owner	Business assets <sup>3</sup> (the business is registered in the commercial register with a tax number)	<ul style="list-style-type: none"> <li>– The valuation of the business includes the value of the business and compensation for the cessation of activity and relocation. The PAR will describe the basis for calculating the estimated value of compensation for loss of income, which also depends on the period of cessation of activity until its resumption.</li> </ul>

<sup>3</sup> According to Article 189 of the Commercial Code (2013), business assets include: (i) Movable property used in the course of a commercial activity, (ii) Mandatorily, the customer base and goodwill. (iii) Any other assets necessary for the operation of the business, such as the sign, trade name, leasehold rights, equipment, tools, merchandise, patents, trademarks, designs and models, and literary and artistic property rights.

Type of loss	Eligibility	Land situation	Compensation
	Informal occupant	Without business	<ul style="list-style-type: none"> <li>Occupants will be compensated (expert assessment of the activity, period of cessation, relocation costs, etc.) within the social framework. During the final ex-post evaluation of the PAR, the situation of the affected operators will be reviewed to ensure that it has been adequately addressed.</li> <li>It should be noted that the PAR will describe the</li> </ul>
Temporary use of land during the execution of works			

Type of loss	Eligibility	Land situation	Compensation
Temporary use of land during the execution of works	Landowner	All land situations	<ul style="list-style-type: none"> <li>– The contractor who will carry out the work is required to lease land, until the work is completed, for the installation of the construction site and the storage of materials, the parking of trucks and machinery, etc.</li> <li>– The lessor will be compensated for the loss of crops or trees.</li> <li>– The owner has the right to refuse to lease their land. In this case, recourse is had to the decree of August 20, 1888, which specifies that temporary occupation (TO) of land is authorized by an order indicating the territory where the land is located, the number and nature of the parcels of which it is composed, their size, and the name and address of the owner or presumed owner.</li> <li>– The local authorities notify the OT order to the owner of the land or their representative.</li> </ul>

Type of loss	Eligibility	Land situation	Compensation
Damage caused by the temporary use of the land (the contractor is obliged to demolish a fence or building to access the project site)	The owner of the land	All land situations	<ul style="list-style-type: none"> <li>The contract signed between the administration and the contractor stipulates that the contractor must restore the plot to its original condition after completion of the work.</li> </ul>
<b>Vulnerable groups</b>			
<b>Vulnerable groups</b>	Disabled persons, orphans, elderly persons without income, as well as persons who have lost a large part of their income or land. These persons will be identified by the social study.		<ul style="list-style-type: none"> <li>National legislation does not provide for this case. However, the project will ensure assistance for vulnerable persons.</li> <li>During the final ex-post evaluation of the PAR, the situation of affected farmers will be reviewed to ensure that they have been adequately supported.</li> </ul>





## 5.1.2 Rights Matrix

Table4 : Rights Matrix

Type of loss	Category of affected persons eligible for compensation	Compensation strategy
<b>Loss of land</b>		
<b>Loss of private land</b> <ul style="list-style-type: none"> <li>• Agricultural land</li> <li>• Collective land</li> <li>• Vacant land</li> <li>• Urban land</li> </ul>	<ul style="list-style-type: none"> <li>• Landowners With certificate of ownership</li> <li>• Registered landowners</li> <li>• Landowners with notarized deeds</li> <li>• Community with a Regional Management Council</li> <li>• Illegal land users (squatters)</li> <li>• Land tenants</li> </ul>	<ul style="list-style-type: none"> <li>• Monetary compensation based on Market price (assessed by a legal expert)</li> <li>• The compensation rate must be in line with <b>the replacement cost of the losses incurred</b> <ul style="list-style-type: none"> <li>(i) For <b>agricultural land</b>, the replacement rate must include: the market value of nearby land with similar production and use potential to the affected land;</li> <li>(ii) The cost of preparing the land for cultivation; and</li> <li>(iii) The cost of any registration and transfer fees.</li> </ul> </li> <li>• For <b>land located in urban areas</b>, the replacement cost must include: <ul style="list-style-type: none"> <li>(i) The market value of land of the same size and use, with similar or improved infrastructure and public services, located near the affected land, and</li> <li>(ii) The cost of registration and transfer taxes.</li> </ul> </li> <li>• Users of "non-legitimate" land will be compensated for infrastructure or buildings on the land but not for the land itself.</li> </ul>

<b>Loss of land for tower rights-of-way</b>	<ul style="list-style-type: none"> <li>• Legal landowners</li> <li>• Customary and informal owners with proof of ownership</li> </ul>	<ul style="list-style-type: none"> <li>• Land restoration</li> <li>• Compensation for loss of agricultural activities on the land</li> <li>• Compensate at market value for the land and sign a memorandum of understanding for the entire duration of operation.</li> </ul>
<b>Loss of state-owned land</b>	<ul style="list-style-type: none"> <li>• Belonging to any administration (OTD, ONAS, SONEDE, etc.)</li> <li>• Ministry of Equipment, etc.)</li> <li>• Illegal land users (squatters)</li> <li>• Land tenants</li> </ul>	<ul style="list-style-type: none"> <li>• Monetary compensation based on the replacement cost of lost land</li> <li>• Compensation for loss of agricultural activities on the land</li> <li>• "Unlawful" land users will be compensated for activities on the land but not for the land itself.</li> </ul>
<b>Structure</b>		
The project is unlikely to affect existing structures. The project is not authorized to impact private or state structures according to the Decree of May 30, 1922. This compensation measure has been included in the matrix that proposes the compensation strategy as a contingency.		
<b>Individual structures</b>	<ul style="list-style-type: none"> <li>• Structure owners</li> <li>• Structure users (merchants, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Compensation for replacement of lost structures</li> <li>• If it is a partial loss, compensation for the affected part if the rest of the structure is still usable</li> <li>• If it is a partial loss and for safety or other reasons the structure is no longer used, compensation for the loss of the entire structure</li> <li>• Monetary compensation for finding an alternative (rental and transport costs)</li> </ul>
<b>Loss of collective infrastructure</b> (tracks, markets, shepherds' tents, etc.)	<ul style="list-style-type: none"> <li>• Owners of structures</li> <li>• Users of the structure</li> </ul>	<ul style="list-style-type: none"> <li>• Monetary compensation for setting up similar structures</li> <li>• Monetary compensation for finding an alternative (rental costs, living expenses, income restoration costs, transportation costs).</li> </ul>
<b>Loss of trees and crops</b>		

<b>Loss of trees and crops</b>	<ul style="list-style-type: none"> <li>• Legal owner/</li> <li>• Owner/tenant/non-title holder</li> </ul>	<ul style="list-style-type: none"> <li>• Advance notice for permanent crops and seasonal crops before damage</li> <li>• Compensation for standing crops based on an annual crop cycle at market value;</li> <li>• Compensation for perennial crops and fruit trees at the net annual market value of the product, multiplied by the remaining productive years.</li> <li>• For olive trees: the trees will be relocated by the project in addition to the replacement cost of the tree</li> </ul>
<b>Loss of income</b>		
<b>Permanent or temporary loss of income sources</b>	<ul style="list-style-type: none"> <li>• Permanent and/or seasonal farm workers,</li> <li>• Livestock farmers who may experience difficulties accessing their usual grazing areas during construction or maintenance work;</li> <li>• People whose economic activities will be disrupted by the project: local produce traders, agricultural worker transporters, water transporters, etc. <ul style="list-style-type: none"> <li>- Unemployed persons without training,</li> <li>- As well as any other person who will be considered vulnerable by future detailed socio-economic studies</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Compensation for income restoration: <ul style="list-style-type: none"> <li>- Compensation of sufficient wages (3 to 6 months) to find another job for agricultural workers</li> <li>- Avoid the olive harvest period during construction work</li> <li>- Assistance to livestock farmers in finding other access to grazing areas</li> <li>- Assistance to mobile traders to set up in other areas and encourage them to set up in markets (ensuring continuity of their activities)</li> <li>- Compensation for disruption/cessation of income sources</li> </ul> </li> </ul>
<b>Assistance to vulnerable people affected</b>		

<b>Impacts on vulnerable people</b>	<ul style="list-style-type: none"> <li>Households below the poverty line</li> <li>Single female heads of households</li> <li>People with disabilities,</li> <li>Elderly people living alone,</li> <li>People with chronic illnesses,</li> <li>Families without support</li> <li>Unemployed graduates,</li> </ul>	<ul style="list-style-type: none"> <li>Vulnerable individuals are entitled to additional assistance: <ul style="list-style-type: none"> <li>- Transportation,</li> <li>- Financial assistance,</li> <li>- Training,</li> </ul> </li> <li>Facilitation of access to microcredit and existing government programs.</li> </ul>
<b>Other compensation mechanisms</b>		
<b>Amicable negotiations (purchase)</b>	<ul style="list-style-type: none"> <li>Can be conducted with landowners or informal occupants</li> </ul>	<ul style="list-style-type: none"> <li>Negotiations must be conducted transparently, at a fair price, and without intimidation. Their outcome must not have a negative impact on the economic and financial conditions of the affected person</li> </ul>

## 5.2 ASSESSMENT OF AFFECTED ASSETS

The assumptions used to assess losses are applied to the project based on the information available at this stage. The estimate was made based on the analysis of satellite images (*Google Earth* and *Google Maps*), cross-referenced with the results of field visits.

### 5.2.1 affected land

The project does not result in the total loss of agricultural land, but some privately owned cultivated plots may be partially affected, particularly by the installation of high-voltage power line pylons, each of which is estimated to occupy an area of approximately 8\*8 meters (64m<sup>2</sup>).

The project concerns various types of land: state-owned (private or public), collective, and private.

- Principles: the land will be valued on the basis of its current market value, taking into account its location, use, and legal status.
- Methodology: Reference prices will be estimated based on information gathered from members of the regional council, using prices from comparable transactions in the area.
- Procedures: the valuation will be carried out in a fully transparent manner, with prior validation by local authorities and consultation with the persons concerned.

5 : Summary table of land crossed by the power line

Route	Length (km)	Total number of plots crossed*	Private land	Requisitioned land	State-owned land
Initial route	45.5	132	79	19	32

\*A parcel survey was carried out by Qair in 2025 on this route.



Figure6 : Current occupation of the power plant site

## 5.2.2 structures

There are a few structures on the power plant site, including:

- Five lightly constructed huts are occupied year-round by livestock farmers<sup>4</sup>
- Livestock pens
- Principle: these structures will be assessed according to standard replacement cost, without taking into account their age.

<sup>4</sup> Information obtained during a visit to the site by a farmer.



- Methodology: the assessment will be based on a standard price list, in consultation with local authorities, without recourse to detailed technical expertise.
- Procedures: The owners (even informal ones) of the structures will be identified during the field inventory and informed of the compensation amounts.



Figure7 : Livestock shelters on the site

### 5.2.3 Crops and trees

The power line crosses different types of land:

- State-owned land;
- Private agricultural land, cultivated or planted (particularly olive and citrus trees).

Some pylons will be erected directly on private agricultural plots.

- Principle: losses of crops and trees will be compensated based on local agricultural yields and market prices.
- Methodology:
  - For olive and citrus trees: estimate of number, age, and productivity;



- 
- Terms and conditions: farmers, whether owners or operators, will receive compensation for any temporary or permanent loss of use.



*Figure8 : View of olive trees crossed by the route*

#### 5.2.4 Economic activities

No formal commercial activity has been identified at the sites, but some areas are used occasionally by livestock farmers, particularly on the power plant site. This includes camel grazing (camel breeding), which is a traditional practice in the region.

- Principle: The economic impact of the temporary loss of access to grazing land, including for camel breeding, may be taken into account in the assessment of losses.
- Methodology The existence of equivalent grazing areas in the region will also be taken into account to assess the actual economic impact and, if necessary, adjust the compensation measures.

Modalities: Proven cases will be dealt with on a case-by-case basis, in conjunction with local authorities, on the basis of estimates of economic losses based on actual practices observed during field visits.



Figure9 : Livestock farming activity observed on site

### 5.3 CASH COMPENSATION

The compensation principles adopted in this CPR are based on the idea of fair and equitable compensation prior to any taking of the land or property concerned.

The exact amounts will be refined on the basis of detailed inventories to be carried out in the future and are **presented as estimates in section 13.2.**

#### 5.3.1 Rates for asset types

Assumptions are made for the valuation and compensation of potential losses, as an indication:

- Land will be compensated according to its use and legal status, taking into account average prices observed in the region;
- Structures will be assessed according to their type and condition, referring to standard scales



- Crops and trees will be compensated based on yield, local market value, and remaining production life (in the case of trees);
- In the event of loss of access to income (e.g., agricultural or pastoral activities), temporary compensation may be considered.
- Additional compensation may also be provided, such as travel allowances or transitional allowances (e.g., until crops regain their productivity or economic activities are restored).

### 5.3.2 Payment process

At this stage, it is envisaged that compensation will be paid before any actual possession of the property or resources concerned, in accordance with international best practices.

The payment terms will be defined at a later stage as part of **the Resettlement Action Plans (RAPs)**, in consultation with stakeholders and affected persons. As a guide, several options may be considered depending on the context:

- Bank transfers, in cases where beneficiaries have an account;
- Administrative or postal payments in areas where access to banking services is limited;
- Payments upon presentation of supporting documents, in accordance with established procedures (e.g., national identity card, title deed, or any equivalent document recognized locally).

These arrangements will be adjusted to take into account local constraints, the capacities of those affected, and the requirements of partner financial institutions.

These measures will be specified, adjusted, and validated in future PARs, once the PAPs and their losses have been accurately identified.

### 5.3.3 Estimated compensation costs

Some project infrastructure—such as construction sites, maneuvering areas, temporary storage areas, and the existing access road—will involve the temporary occupation or intensive use of agricultural or pastoral land. Although these encroachments are not permanent, they are likely to cause economic or physical disruption, including:

- Temporary loss of land use (interruption of crops or access to pasture);
- Degradation of soil quality (compaction, alteration of structure);
- Nuisances associated with intensive vehicle traffic (dust, noise, congestion of access routes);
- 

In the case of the existing access road, this will be subject to a simple 1 km upgrade.

In accordance with the requirements of the EBRD's SEA, the following measures will be taken for temporary rights of way or use:

- Monetary compensation equivalent to the loss of agricultural income related to the duration of occupation (if applicable);
- Restoration of damaged soil or areas (leveling, weeding, etc.);
- Repairs or compensatory measures in the event of damage to local infrastructure;

These measures will be implemented before or during the temporary occupation of the areas concerned. Details will be specified in the Resettlement Action Plans (RAPs) or in the environmental and social management plans specific to the construction phase.

Table6 : Estimated temporary impacts and compensation measures

Type of land use/purpose	Estimated duration	PAPs concerned	Type of damage	Form of compensation/mitigation
Development of access road (1 km)	1 to 2 months	Local residents, nearby farmers	Access disruption, potential damage	Mitigation measures (watering, signage, schedules) + compensation in the event of exceptional damage
Main construction site	8 months	Landowners, operators	Temporary inaccessibility, cessation of cultivation	Compensation based on surface area + cleaning and restoration after work
Maneuvering area/depot	3 to 5 months	Farmers or livestock breeders	Temporary loss of use or grazing	Lump sum compensation + restoration
Damage to fences, canals	One-off	Local farmers	Damage to agricultural infrastructure	Repair or replacement with identical items (labor + materials provided by the project)

#### 5.4 Assessment of the gender sensitivity of proposed compensation rights

The Personal Status Code was enacted in Tunisia in 1956. This code established a number of progressive laws to promote equality between women and men in areas such as marriage, divorce, child custody, and inheritance, and represented a significant change in family law and the legal status of women in Tunisia.

The land issue represents the economic and social dimension of male hegemony in society, which justifies and reinforces the exercise of power over women. This creates a system that, on the one

hand, sanctifies property and, on the other, allows men to marginalize and exclude women.

➤ **Specific aspects related to vulnerability**

In the context of this RPC, and based on initial field surveys and a review of the literature, vulnerable persons will be defined as follows:

- Households below the poverty line (according to the official national definition)
- Single female heads of household
- People with disabilities
- Elderly people living alone
- People with chronic illnesses
- Families without support
- unemployed graduates,
- Unemployed people without training,
- As well as any other person who will be considered vulnerable by future detailed socio-economic studies .

Gender considerations will be integrated into the development of RAPs through:

- The collection of gender-disaggregated data to identify differences between men and women in terms of income, livelihoods, access to land, education levels, and resettlement preferences;
- Specific consultations with women to identify their particular needs and issues, so that RAP measures do not reinforce gender-based inequalities or violence;
- The design of compensation measures tailored to both men and women, with safeguards for women where necessary;
- Follow-up and monitoring of these considerations during the implementation of RAPs.

## **6 RESTORATION AND IMPROVEMENT OF LIVELIHOODS**

### **6.1 Principles**

Restoration and improvement of livelihoods aim to ensure that people affected by the project do not experience a deterioration in their living conditions, and can even

The actions implemented will be based on the following principles:

- Equitable access to compensation and support measures;
- Strengthening the economic autonomy of PPA
- Integration of gender and vulnerability dimensions.

## 6.2 *Restoration and improvement of land-based livelihoods*

Grazing practices, particularly in the area around the power plant, have been observed. These temporary practices will be taken into account when developing restoration measures. Actions to support agricultural or pastoral activities may be implemented, including:

- The provision of agricultural support: seeds, seedlings, small equipment, tools, or technical services;
- Specific support for livestock farmers, including those practicing temporary grazing;
- Coordination with the relevant agricultural services (CRDA) to identify the most appropriate types of support for the affected areas.
- Informing livestock farmers about alternative grazing and livestock farming areas.

The role of women in these activities will be taken into account, in accordance with section 6.5:

- Active participation in agricultural and pastoral activities;
- Equitable access to resources and support measures (tools, training, seeds, technical assistance);
- Facilitation of market access for their agricultural and pastoral products;
- Integration of women's specific needs and priorities into the design of livelihood compensation and restoration measures.

## 6.3 *Restoration and improvement of non-land-based livelihoods*

Economic activities may be involved in order to promote local hiring during the construction phases (security, earthworks, etc.) for PAPs. This temporary opportunity may help to offset some indirect economic losses.

At this stage, no directly affected commercial or craft activities have been identified.

Hypothetical support may include:

- Support for the creation of income-generating activities;
- Support for the formalization of certain micro-activities;
- Access to economic opportunities related to the project.

## 6.4

Depending on the needs identified, the project may offer:

- Vocational training for young PAPs (electricity, construction, maintenance, etc.);
- Agricultural training for affected farmers or livestock breeders;
- Specific training for women: crafts, agri-food processing, micro-project management.

## 6.5 *Specific gender-related aspects*

Restoration actions will take into account the situation of women in order to ensure:

- Their equitable access to compensation and support measures;
- Their active participation in economic activities and decision-making processes;
- The development of specific initiatives that promote their skills and know-how.

### ***6.6 Specific aspects related to vulnerability***

People in vulnerable situations (female heads of households, elderly people, people without resources) will be able to benefit from:

- Enhanced social support;
- Priority access to support measures;
- Special attention when identifying needs and implementing support measures.

### ***6.7 Partnerships and links for planning and implementing livelihood restoration and improvement***

The implementation of livelihood restoration actions may be supported by:

- Local public structures (CRDA, delegations, ANETI, etc.);
- Local or national associations active in the field of economic and social development;
- The participation of affected communities through dialogue and consultation mechanisms.



## 7

### 7.1 Results of the consultation carried out as part of the preparation of the CPR

As part of the development of the Resettlement Action Plan (RAP) for the Khobna photovoltaic power plant project in Sidi Bouzid, several consultation meetings were held with institutional and local stakeholders between April and July 2025. These consultations addressed specific issues related to the site's land situation, collective lands, easements, heritage constraints, and existing infrastructure. They also identified areas of focus for the preparation of future stages of identification, compensation, and dialogue with potentially affected persons (PAPs).

Table7 Consultations related to resettlement and land issues (Khobna – Sidi Bouzid)

Date	Meeting	Stakeholders consulted	Main points discussed	Actions to be taken
05/08/2025	Meeting at the Governorate of Sidi Bouzid	Governor, Secretary General of the Governorate, CRDA, State Property Department, Regional Council, Omda Khobna, Mezzouna Delegation, Qair, etc.	Confirmed state property status (plot no. 52,732), strong local support, coordination recommended between institutional parties	Finalize field investigations, organize a debriefing meeting, and support regularization
05/09/2025	Meeting with CRDA – Land District	Leila Amami (Head of Soil Classification), E&S ASF team	Agricultural use of land, importance of soil and land documents, maps provided	Integrate data into land valuation, preserve agricultural uses when laying out overhead lines.
09/05/2025	Meeting with CRDA – CES	Anis Ghezal (Head of CES)	Absence of CES structures on the site, recommendations not to affect the embankments, possible rehabilitation measures	Identify CES structures along the route, plan for their rehabilitation if affected
	Meeting with	Abdellatif Ben Ali	Validation of the	Study

	the DRF of Mazzouna (Bouhedma Park)	(Curator), ASF, Qair	overhead line route outside the park, suggestion to install pylons on forest land to avoid agricultural conflicts	authorizations with the ministry, integrate Halfa constraints and forestry regulations.
May 10, 2025	Informal meeting with a family (Arch Jenf)	Landowners concerned (heir family)	Titled plots, presence of dwellings near the wadi, isolation in the event of flooding, limited livestock farming	Document individual situations in the PAR, adapt measures for vulnerable areas

## 7.2 Engagement and disclosure plan for the next steps

### 7.2.1 Consultation and engagement plan

To ensure effective and inclusive participation by stakeholders affected by the potential impacts of the project, several consultation activities have been planned or carried out. These actions aim to gather expectations, identify land and social issues, and foster a climate of constructive dialogue throughout the resettlement process.

Table8 Consultation and engagement plan

Activity	Estimated period / Status	Target area/location	Target stakeholders	Responsible	Main objective
Launch of the CPR mission and initial meetings with Qair, donors, and local authorities	April 2025 - Achieved	Khobna and relevant sectors	Qair, EBRD, EIB, IFC, governorate, delegations, and municipalities	ASF Consulting	Presentation of CPR objectives, scoping of work
Initial meetings with some PAPs (informal) in Sidi Bouzid	April-July 2025 - Completed	Khobna, and sectors concerned	PAPs concerned, local authorities (Omda, delegation)	ASF Consulting	Preliminary identification of issues and perceptions
Information on the future development of PARs by a dedicated consultant	TBD	Khobna, and relevant sectors	PAPs, local authorities, civil society	PAR consultant	Prepare PAPs for the operational phase
Targeted meetings with	TBD	Khobna and relevant	Formally identified PAPs	PAR consultant	Detailed census, agreement on

PAPs during PAR preparation		sectors			compensation terms
Ongoing information through community liaison officer and local NGOs	Ongoing (to be reinforced post-CPR)	Khobna and affected sectors	PAPs, vulnerable groups	PAR consultant / NGO partners	Maintaining the information and listening link

## 7.2.2 Disclosure and information plan

### 7.2.2.1 Documents to be published

The following documents will be prepared and made public as part of the resettlement process:

- Loss Acquisition and Resettlement Framework (LARF);
- Resettlement Action Plan (RAP);
- Register of affected property and persons (in anonymized form);
- PAP information brochure (rights, steps, timeline, points of contact);
- Resettlement and Land Acquisition Guide (GLAC), in plain language, including the rights matrix, provisional timetable, steps and contact points;
- Specific Complaints Management Mechanism (MGP-R);
- PAR implementation reports and monitoring reports.

### 7.2.2.2 Languages used

- **French:** for official and institutional documents;
- **Tunisian Arabic dialect:** for community communication (meetings, brochures, posters, radio announcements, text messages).

### 7.2.2.3 Distribution channels

Channels	Specific use in the resettlement process
<b>Community meetings</b>	Presentation of the CPR, clarification of eligibility criteria and the complaint management mechanism, discussions with PAPs.
<b>Home visits/individual meetings</b>	For vulnerable individuals or those who are unable to attend public meetings. Enables confidential discussions and is more accessible for women with mobility issues.
<b>Public displays</b>	Town halls, health centers, schools, mosques, cafes: posters explaining PAPs' rights, steps to take, and points of contact.
<b>Local radio stations (e.g.,</b>	Broadcasting of information messages in Arabic dialect

<b>Karama FM)</b>	concerning the compensation process and key deadlines.
<b>Direct phone calls</b>	Personalized information (compensation dates, missing documents, complaint follow-up). Suitable for people with limited access to digital technology or literacy.
<b>Mobile support (SMS)</b>	Sending reminders or key information to PAPs via targeted SMS (e.g., payment dates, meetings, available documents).
<b>Illustrated brochures</b>	Distribution of explanatory sheets in A4 format during visits or meetings, adapted for people with low literacy skills.
<b>Digital platforms</b>	Posting the CPR and simplified versions on the Qair website and sharing them via social media.

#### 7.2.2.4 Information on availability

PAPs will be informed of the availability of documents and the start of the process by:

- **Explanatory posters** in Arabic in public places (souks, town halls, mosques, etc.);
- **Radio spots** announcing the locations and dates for document distribution;
- **SMS announcements** for meeting dates and processing deadlines;
- **Support from community representatives** for manual distribution and reading assistance;
- **Local consultations** with a social mediator or a member of the E&S team.

Table9 : Plan for disseminating information related to resettlement

Activity	Estimated timeframe/status	Target area/location	Target stakeholders	Responsible	Main objective
Preparation and submission of the provisional CPR to the client	Week of June 17, 2025 (planned)	Khobna and relevant sectors	Qair and donors	ASF Consulting	Official transmission of the CPR for validation
Presentation of the provisional RFA to institutional stakeholders	July 2025 (planned)	Tunis	Qair, donors	ASF Consulting	Gather feedback on CPR guidelines
Posting of CPR (public version) on Qair or	September 2025 (planned)	Online platform	Wider public, local media, NGOs	Qair / Communications Consultant	Transparency and open access to information

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project website					
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## 8 Mechanism for handling complaints related to resettlement

### 8.1 Objectives

As part of the resettlement process envisaged for the Sidi Bouzid solar photovoltaic power plant project, a specific grievance mechanism (GMR) has been established to enable project-affected persons (PAPs), neighboring households, and any other concerned parties to raise grievances related to land issues, compensation, access to resources or vulnerability, or any other issues related to the land acquisition and displacement process.

This mechanism is designed to complement the Project Complaints Management Mechanism, ensuring that grievances specifically related to resettlement and land acquisition are handled with appropriate sensitivity and oversight. This mechanism aims to:

- **Ensure access to a prompt, fair, and transparent remedy** for all complaints related to resettlement;
- **Prevent social tensions** that could hinder project implementation;
- **Build trust** between PAPs, local authorities, and the developer;
- **Meet the requirements of the IFC (NP5), the EBRD (EES5), the EIB (NES6), and national best practices.**

### 8.2 Types of complaints expected

The MGP-R is designed to deal with the following types of grievances in particular:

- Disputes over eligibility for compensation;
- Disagreement over the amount, type, or form of compensation;
- Delays in payment or delivery of compensation;
- Failure to fulfill commitments (land transfer, relocation support, etc.);
- Errors in cadastral data or census records;
- Lack of clarity or information on resettlement criteria;
- Specific cases of vulnerability not taken into account (female heads of household, elderly people, etc.).

### 8.3 *inciples*

The mechanism is based on the following principles:

- **Confidentiality:** complaints may be made anonymously;
- **Non-retaliation:** PAPs can express themselves freely, without fear;
- **Accessibility:** the procedure is free of charge, in Arabic dialect, and adapted to the level of literacy;
- **Impartiality:** fair treatment of requests, without discrimination;
- **Traceability:** formal recording in a specific resettlement register.

### 8.4 *Complaint management process*

- **Receipt**

Complaints can be submitted at any time by project-affected persons (PAPs), local residents, authorities, or any other relevant stakeholders. The project provides several accessible, confidential, and non-discriminatory channels to ensure that all voices can be heard.

Complaints can be received through the following channels:

- **Community relays:** trusted local figures (e.g., Omda, association representatives identified in the sectors concerned (Mezzouna, Meknassy) and made aware of their role in mediation and communication;
- **Local NGO partners:** involved in social and environmental support, they can receive complaints and refer PAPs to the appropriate channels for processing;
- **Local project office or E&S team:** direct point of contact, with the possibility of submitting complaints orally or in writing within the local Qair structure; a dedicated contact will be shared with stakeholders.
- **Public meetings or community consultations:** where a specific mechanism is provided for collecting concerns, comments, and complaints, either verbally or in writing;
- **Physical complaint boxes:** installed in busy public places (town halls, health centers, schools) at the level of the delegations and sectors concerned;

- **Remote channels:** telephone, SMS, or electronic form on the Qair website or on a dedicated project platform;
- **Funders:** affected persons may also address their complaints directly to the institutions financing the project, namely the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB) or the International Finance Corporation (IFC), via their independent complaint handling mechanisms (IPAM, Complaints Mechanism, CAO, etc.).
- **Registration**
  - A complaint form is completed by the ALC, who will be the MGP focal point, and a reference number is assigned.
  - The complaint is entered into a dedicated MGP-R register maintained by Qair's social team.
- **Analysis**
  - Qair's social team assesses the content, verifies the facts, and consults census documents.
  - In the event of a complex dispute, a local complaints management committee is convened (including representatives from the governorate, land authorities, external consultants/Qair).
- **Response**
  - A solution is proposed within a maximum of 30 working days.
  - If accepted, the complaint is closed; if not, an appeal is possible.
- **Closure and archiving**
  - A closure form is signed and archived in the register.
  - Enhanced monitoring for vulnerable or sensitive cases.



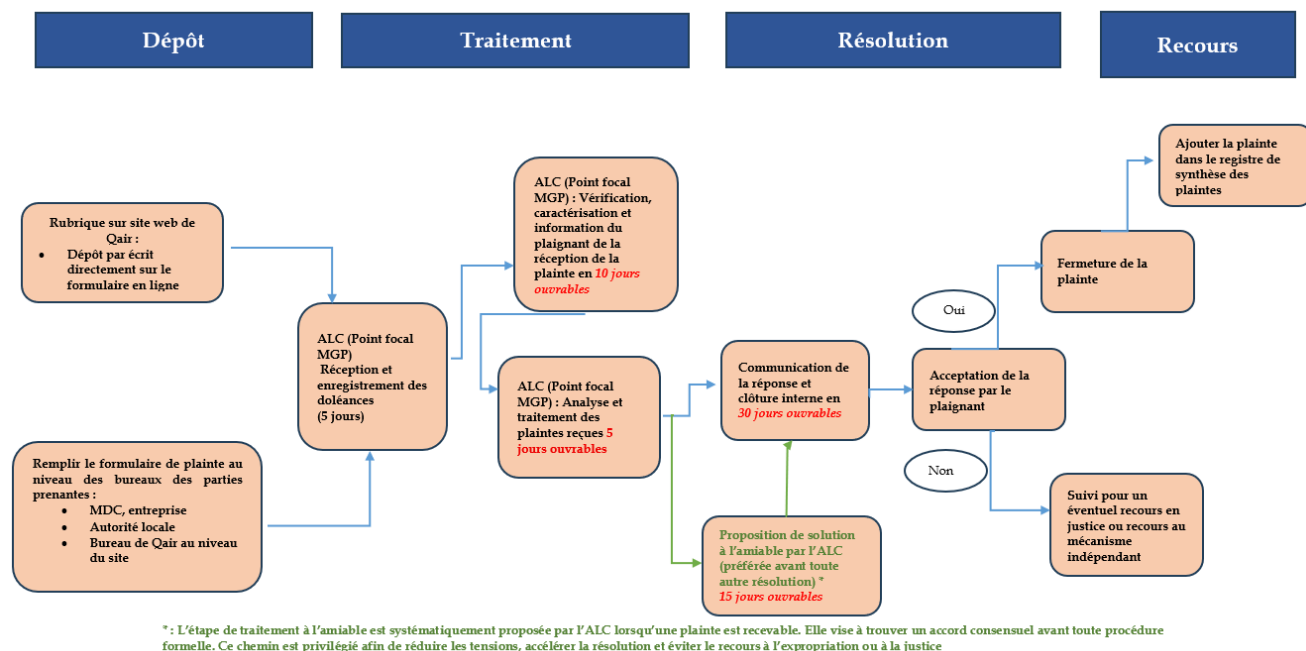


Figure10 Process for managing complaints related to resettlement

## 8.5 Timeframes for the stages of the mechanism

Table10 : Timelines for the stages of the MGP

Stage of the mechanism	Recommended timeframe
Receipt	(Complaints received at any time)
Registration	5 business days
Analysis	10 to 15 business days
Amicable resolution <sup>5</sup>	Up to 15 business days
Response	30 business days maximum
Escalation to the committee*	"Pending" status, with the possibility of extending the deadline by agreement with the complainant, while the committee reviews the case and proposes a solution
Closure and archiving	7 days after acceptance of the solution

If no resolution is reached at the end of the standard steps, the complaint may be brought before a complaint management committee. During this escalation phase, the case will be given "pending" status. This status may be extended by agreement with the complainant, in order to allow the committee sufficient time to examine the complaint and propose an appropriate solution.

## 8.6 Informing PAPs about the mechanism

<sup>5</sup> The amicable settlement stage may overlap partially with the analysis stage in order to increase efficiency.

PAPs will be informed about the MGP-R:

- During community consultation campaigns;
- Through posters in town halls, health centers, and public places;
- Through social media and NGO partners in the project area;
- In local languages and with simplified visual aids

## 8.7 *GBV-sensitive complaint management mechanism (MGP-R-GBV)*

### 8.7.1 Objectives

As part of the Khobna solar photovoltaic power plant project, a Complaints Management Mechanism specific to cases of Gender-Based Violence (CMM-GBV) has been set up to complement the main CMM. The purpose of this mechanism is to ensure the rapid, confidential, and sympathetic handling of complaints relating to acts or risks of violence, harassment, exploitation, or sexual abuse that may occur in the context of the project.

This mechanism aims to:

- Provide a secure, confidential, and accessible channel for reporting incidents of GBV;
- Prevent and mitigate the risks of GBV related to project activities (workers, subcontractors, communities);
- Protect survivors and ensure they are referred to specialized services;
- Meet the requirements of the EBRD, IFC, and EIB for managing sensitive complaints;
- Strengthen the social accountability of the project through a survivor-centered approach.

### 8.7.2 Types of complaints expected

The MGP-R-GBV is designed to deal with the following types of complaints with particular attention:

- Sexual harassment in the workplace or in local communities;
- Sexual or physical assault by staff members or subcontractors;
- Sexual exploitation in exchange for employment, services, or compensation;
- Intimidation or threats related to reporting GBV;
- Breaches of confidentiality or protection of the survivor;
- 

### 8.7.3 Guiding principles

The mechanism is based on the following principles:

- **Absolute confidentiality:** no information is disclosed without the survivor's informed consent;
- **Consent and willingness:** the complaint is only processed if the survivor wishes it to be, and at her own pace;
- **No reprisals:** protection for individuals who report or denounce cases;
- **Survivor-centered approach:** priority given to the safety, well-being, and dignity of the affected person;
- **Referral to specialized services:** health, psychosocial support, police, and legal protection;
- **Free, accessible, and culturally appropriate procedure.**

#### 8.7.4 GBV complaint management process

- **Receipt**
  - Reporting by the survivor or a trusted third party (NGO, Qair social team, medical staff);
  - Secure complaint box, dedicated number with trained staff, or direct contact with GBV representative.
- **Secure recording**
  - Recording in a separate register, non-nominative unless explicitly authorized;
  - Assignment of a confidential code to ensure follow-up.
- **Initial assessment and consent**
  - Initial contact by a person trained in GBV management;
  - Assessment of immediate needs (safety, medical care, psychosocial support);
  - Obtaining informed consent before any action or external reporting.
- **Care and referral**
  - If necessary, referral to a local specialized service (NGO, health center, specialized police);
  - Regular and confidential follow-up by the project's GBV representative.
- **Closure**
  - The complaint is closed only at the request or with the agreement of the survivor;
  - Secure documentation and separate archiving from the general MGP.

#### 8.7.5 Mechanism stage deadlines

Table11 : Timelines for the stages of the MGP – R - GBV

Stage of the mechanism	Recommended timeframe
Receipt	At any time
Initial contact	< 24 hours
Initial assessment	1 to 3 days
Referral to services	Immediate (if urgent)
Closure	According to the survivor's wishes

### 8.7.6 Informing communities about the mechanism

The MGP-R-VBG will be presented specifically through:

- Targeted information sessions for women and vulnerable groups;
- Posters and brochures with prevention messages, useful contacts, and survivors' rights;
- The involvement of community relays trained in GBV;
- Mandatory training for employees, subcontractors, and project managers on the Code of Conduct and anti-GBV measures.

### 8.7.7 Coordination with stakeholders

The mechanism relies on:

- Partnerships with local NGOs specializing in GBV;
- Collaboration with health, police, and social protection structures;
- A designated GBV representative within the project's social team.

## 9 VULNERABLE PEOPLE

### 9.1 vulnerability analysis

#### 9.1.1 Definition and criteria for vulnerability in the context of the project

Within the framework of this CPR, vulnerable persons will be defined as follows, based on initial field surveys and a review of the literature:

- 
- Households below the poverty line (according to the official national definition)
- Single female heads of household
- People with disabilities
- Elderly people living alone
- People with chronic illnesses

- Families without support
- Unemployed graduates,
- Unemployed people without training,
- As well as any other person who will be considered vulnerable by future detailed socio-economic studies.

### 9.1.2 Vulnerability matrix

#### Identification of vulnerable groups:

- **Elderly people:** They may be more sensitive to heat and water shortages and to separation from their families or caregivers during the resettlement process.
- **Children:** They are more vulnerable to disease and accidents.
- **Women:** They may be more affected by changes in their lifestyles and access to resources and social networks.
- **Low-income people:** They may be less able to cope with the costs of energy transition or environmental impacts.
- **Agricultural population:** They may be affected by changes in land use, reduced access to water, and loss of access to markets as part of resettlement.
- **People living in marginalized areas:** They may be less well served by infrastructure and services.
- **People with disabilities:** They may have specific needs in terms of access to infrastructure, services, or support networks throughout the resettlement process.

#### Identification of specific risks:

- **Land use change:** Resettlement procedures may exacerbate the loss of access to agricultural or pastoral land, thereby reducing the livelihoods of affected households.
- **Access to and availability of water:** The displacement of communities or changes to their land may exacerbate water shortages, particularly if water sources or infrastructure become inaccessible.
- **Changes in the local microclimate:** Resettled populations may be relocated to more exposed or less suitable areas (increased heat, fragile soils), which could affect their living and production conditions.
- **Impacts on biodiversity and ecosystem services:** Resettlement may lead to loss of access to natural areas used for grazing, gathering, hunting, or other essential resources.
- **Impacts on air quality:** Construction and resettlement activities (earthworks, movement of materials, new roads) can generate additional dust, affecting displaced households and their health conditions.
- **Socio-economic impacts:** Displacement can lead to a loss or reduction in income from agriculture, livestock farming, or local activities, as well as disruption to social

networks and community solidarity.

- **Health risks:** Resettlement may increase households' exposure to health risks (pollution, solar radiation, products used for construction), particularly if access to health infrastructure becomes more limited.

- 

## 9.2 Potential activities to assist vulnerable people

Matrix:

Table12 : Identification of vulnerable groups and adaptation strategies

Vulnerable group	Specific risks	Mitigation measures
Elderly people	Heat, water shortages	Creation of cool zones, distribution of drinking water, and maintenance of existing social support networks (family, neighbors, community groups) to preserve social ties throughout the process.
Children	Heat, illness	Awareness campaigns, access to healthcare, and involvement of parents or guardians in awareness activities and monitoring children's health.
Women	Change in lifestyle habits, access to resources	Support for women entrepreneurs, access to services, and maintenance of support networks (family, community) to maintain social ties.
Low-income individuals	Costs associated with the energy transition	Subsidies, access to affordable renewable energy
Agricultural population	Land use change, reduced access to water	Technical support, crop diversification, agricultural livelihood restoration programs, and easier access to markets.
Marginalized populations	Lack of access to infrastructure and services	Development of appropriate infrastructure, access to social services, and actions to include marginalized populations in decisions on compensation, monitoring, and livelihood restoration.
People with disabilities	Difficulties in accessing services, loss of support networks	Specific accessibility arrangements, measures to maintain or recreate support networks and ensure their participation in resettlement

## 9.3 Implementation modalities and budget for assistance to vulnerable persons

The project plans to implement assistance for vulnerable persons.

Budgets are defined according to the needs of vulnerable persons identified in the Resettlement Action Plan. Specific actions must be planned, with considerable allocations for combating poverty, inequality, and climate change.

The budget for assisting vulnerable persons can only be established after a thorough investigation to properly identify and target the persons to be assisted.

## 10

### 10.1 *General objectives of monitoring and evaluation*

Monitoring and evaluation aim to ensure that all measures set out in the Resettlement Policy Framework (RPF) are effectively implemented, in line with the project's commitments and EBRD performance standards. The objectives are as follows:

- To ensure that resettlement, compensation, and livelihood restoration **are designed and implemented with the active participation of Project Affected Persons (PAPs)**, in accordance with SEA 5 principles;
- Identify deviations or delays early on in order to take corrective action;
- Assess the effectiveness of compensation measures, particularly for vulnerable PPA;
- Verify PIA satisfaction and document the resolution of complaints;
- Produce reports for stakeholders, including donors, to improve transparency.

### 10.2 *Audit and monitoring during implementation*

#### 10.2.1 **Scope and content - Internal activities**

The developer (QAIR), with the support of the environmental and social consultant, will monitor the following activities on a monthly basis:

- Payment of compensation prior to any land occupation, verifying that the full replacement cost is respected.
- Number of households and/or individuals who received monetary compensation during the period in question.
- Use of compensation by PAPs (e.g., housing, productive activities, social expenses), in order to assess whether it effectively meets the needs of households.
- Restoration of land affected by temporary encroachments;
- Monitoring of resettlement cases (if applicable);
- Number of households and/or individuals (broken down by gender) who have received training or assistance related to livelihood restoration, broken down by type (agriculture, livestock, trade, crafts, etc.).
- Receipt and processing of complaints; number of open/closed/pending complaints, average time to resolution, breakdown by gender and vulnerability of the complainant.
- Support for vulnerable people or those requiring specific assistance, including survivors of gender-based violence (GBV/GBVH)
- Monitoring of community awareness and participation.



### 10.2.2 Scope and content - External reviews

An independent external audit will be conducted by a third-party consultant (not involved in the project) at mid-term and at the end of implementation. The audit will focus on:

- The project's compliance with SEA 5 requirements;
- The effectiveness and completeness of all forms of compensation (monetary, in kind, physical relocation, assistance with restoring livelihoods, etc.).
- The effectiveness of grievance mechanisms, including the quality of follow-up (open/closed/pending grievances, timelines, profile of complainants).
- The restoration of the living conditions of PAPs and the living conditions and livelihoods of PAPs.

### 10.2.3 Indicators, including key performance indicators

The indicators below can be used to monitor the effectiveness of the implementation of resettlement and compensation actions, as well as the quality of complaint management and stakeholder information throughout the project.

Table13 : Indicators for monitoring and evaluating social impacts: Internal monitoring (Qair+E&S consultant)

Indicator	Objective
% of PAPs compensated before land occupation	100
Complaint resolution rate within 30 days	≥ 90
Number of open/closed/pending complaints (broken down by gender)	Continuous monitoring
Number of vulnerable PAPs who received specific assistance (including GBVH)	100% of identified cases
Number of PAPs who have received training or support for livelihood restoration (broken down by gender and type of activity)	≥ 70% of affected PAPs
Number of PAPs who have regained an equivalent or higher standard of living	≥ 80%
Number of information meetings held	≥ 3 (depending on phase)
% of temporary land use restored	100
Level of satisfaction among PAPs (annual survey)	≥ 75% favorable responses

Table 13: Social impact monitoring and evaluation indicators: External monitoring and evaluation (independent audit)



Indicator	Objective
Compliance with SEA5 / PR5 requirements	100
Rate of delivery of all forms of compensation (monetary, in kind, resettlement, restoration of livelihoods)	100
Security of tenure achieved for resettled PAPs	100
Effectiveness of complaint management mechanisms (timeliness, processing, fairness)	≥ 90
Level of restoration or improvement in the living conditions of PAPs	≥ 80
Quality and adequacy of support provided to vulnerable PAPs	In line with commitments
Effective use of compensation by PAPs (housing, livelihoods, basic needs)	≥ 80% deemed adequate by audit
Participation of PAPs in the design and implementation of compensation processes	≥ 70% of affected PAPs involved

#### 10.2.4

It is recommended that three types of reports be produced to ensure effective monitoring of the resettlement process:

- Monthly internal reports covering technical and social aspects;
- Semi-annual evaluation reports to be submitted to the EBRD/EIB and IFC;
- A final audit report (see Chapter 11.3).

### 10.3 completion audit

#### 10.3.1 Objectives and scope

The completion audit aims to:

- Verify that all compensation has been paid;
- Confirm that PAPs have not been impoverished by the project;
- Ensure that all complaints have been satisfactorily resolved;
- Learn lessons for future projects.

#### 10.3.2 Success/completion criteria

- No unresolved complaints;
- 
- PAP satisfaction rate above 80%;
- Rehabilitation of temporary rights-of-way completed and compliant.
- Effective implementation of livelihood restoration measures, with at least 80% of affected PAPs having regained or improved their standard of living.

### 10.3.3 Schedule and procedures for implementing the completion audit

- The completion audit will be conducted by an independent external consultant. To ensure a comprehensive assessment, its timing will be aligned with the effective implementation of livelihood restoration measures.
- The audit will be scheduled once the compensation and livelihood restoration measures have been implemented and monitored for a sufficient period of time to assess their results.
- The audit will include:
  - Field surveys (interviews, questionnaires) with displaced PAPs and vulnerable households;
  - A documentary analysis of compensation records, complaints, and livelihood restoration activities;
  - A feedback meeting with relevant stakeholders.
- The completion audit report shall present conclusions on the effective improvement or restoration of livelihoods, as well as corrective measures to be implemented if these results are not achieved. The scope, timing, and modalities of this audit will be specified in the Resettlement Plan, with clear completion criteria with which the project must comply.
-

## 11

### 11.1 Responsibilities for implementation

Actor: Main responsibilities:

- QAIR Group: Overall supervision, fundraising, coordination with the EBRD
- Social consultant: Daily monitoring, reporting, field coordination
- Local authorities: Legal support, communication, conflict resolution
- Local monitoring committee: Community monitoring, citizen participation
- External firm: Conducting audits and independent evaluation

### 11.2 Budget and financing arrangements

Table14 : Cost estimate table

Losses by component	Cost in TND
<b>PV power plant</b>	
Cost of land transfer (DPE) <sup>6</sup>	Under negotiation
Structural monetary compensation (approximately 6 huts) <sup>7</sup>	12,000
Monetary compensation for equipment (3 enclosures) <sup>8</sup>	6,000
Cost of stakeholder engagement and communication (seminars, brochures, signs, etc.)	10,000
<b>Total (TND)</b>	<b>42,000</b>
<b>High-voltage lines</b>	
Cost of acquiring either hectares of private and state-owned land, both bare and cultivated, for the installation of 109 pylons <sup>9</sup>	Information not available at this time
Cost of SNCFT works related to flying over the DPCF	2,000 <sup>10</sup>
Annual cost of the fee for crossing the DPCF	15 <sup>11</sup>
Compensation for 6 trees: Olive trees/fruit trees	3,000
<b>Total (TND)</b>	
<b>1 km access road</b>	
Cost of developing 6,000 m <sup>2</sup> of access road	

### 11.3 Actions required to develop a land acquisition and resettlement plan

Once the final right-of-ways have been confirmed, it is recommended that the following steps be

<sup>6</sup> DPE = State Private Domain

<sup>7</sup> One hut = 2000DT

<sup>8</sup> One enclosure = 2000DT

<sup>9</sup> The exact location of the pylons is not yet available at this stage. Consequently, it has not been possible to accurately estimate the costs associated with the occupation of the land concerned. A detailed assessment will be carried out once the locations have been finalized.

<sup>10</sup> ≤ 2000 DT according to the SNCFT engineer

<sup>11</sup> 150\*crossing point

**taken to ensure that resettlement is managed in a compliant and equitable manner:**

- Delimitation of actual rights-of-way based on implementation plans;
- Detailed census of Project Affected Persons (including vulnerable persons);
- Assessment of assets and losses;
- Participatory development of compensation measures;
- Drafting and validation of the Resettlement Action Plan (RAP);
- Implementation of compensation measures before work begins.

#### **11.4 *schedule***

**The provisional timetable for implementing the resettlement process could be structured as follows:**

- Development of the Resettlement Action Plan (RAP): Month 1 to Month 3;
- Validation of the PAR by the competent authorities and banks: Month 4;
- Implementation of compensation measures: Month 5 to Month 7;
- Implementation of livelihood restoration measures: Month 5 to Month 10 (or longer, depending on the needs of the PAPs);
- Commencement of works: Month 8;
- Monitoring and auditing of the resettlement process: Month 8 to Month 18, depending on the duration of the construction work.

#### **11.5 *Change management***

Adjustments may occur during the project, particularly with regard to:

- The final route of the power line or access road;
- The number or profile of Project Affected Persons (PAPs);
- The compensation arrangements.

In such cases, a formal process to revise the Resettlement Action Plan (RAP) or Resettlement Policy Framework (RPF) must be initiated. This process will involve:

- Updating the PAP census and/or loss assessments;
- A new consultation with the relevant stakeholders;
- 
- Submitting the changes to the EBRD for final approval.

### *Appendix A: Census file and methodology*

<b>Initial census of potentially affected persons – Sidi Bouzid, May 2024</b>	
<p>As part of the development of this Resettlement Policy Framework (RPF), a field trip was conducted in Sidi Bouzid to carry out an initial identification of people potentially affected by the project. This work was carried out by the ASF Consulting team on May 8, 2024, in the areas of Khobna and El Meknassy, particularly at the planned site for the solar power plant and along the estimated route of the power line.</p> <p>On the power plant site, huts and traces of livestock farming were observed, indicating temporary occupation by farmers, although no one was present during the visit. It was therefore not possible to consult directly with these potential users. A meeting was then organized at the governorate of Sidi Bouzid with the relevant stakeholders, including the developer QAIR, as well as the Tunisian institutions involved (CRDA – land, water, and CES services –, Directorate General of Forests, State Property, OTC, etc.).</p> <p>Useful data was collected by the authorities: maps, photographs, types of affected properties, crops in place, and geolocation of the elements observed.</p> <p>Additional visits were carried out in coordination with the land services and members of the CRDA to identify the areas crossed by the power line. These visits revealed the presence of private land, mostly planted with olive trees. Part of this land is occupied by a large family (Arch), with whom an informal consultation was conducted to better understand the composition and number of members of this family.</p> <p>No individual census forms have been completed at this stage, as this preliminary step is only intended to estimate the extent of potential impacts in preparation for a comprehensive Resettlement Plan, if necessary. No formal reference date has yet been set, and no certificates have been issued to the people interviewed.</p>	

Element	Detail
<b>Field mission date</b>	May 8, 2024

<b>Areas covered</b>	<ul style="list-style-type: none"> <li>- Power plant site in Khobna</li> <li>- Estimated route of the power line (from Khobna to El Meknassy)</li> <li>- STEG in El Meknassy</li> </ul>
<b>Team in charge</b>	ASF Consulting
<b>Methodology used</b>	<ul style="list-style-type: none"> <li>- Direct observation</li> <li>- Informal interviews</li> </ul>
<b>Activities carried out</b>	<ul style="list-style-type: none"> <li>- Observation of huts and grazing traces (livestock farmers absent during the visit)</li> <li>- Meeting at the governorate with QAIR and institutions</li> <li>- Field visits accompanied by land services (tower locations)</li> <li>- Informal consultation with three members of a large family (Arch) on inhabited private land (houses) located near numerous olive groves belonging to other owners.</li> </ul>
<b>Data collected</b>	<ul style="list-style-type: none"> <li>- Maps</li> <li>- Photographs</li> <li>- GPS location</li> <li>- Type of property: temporary pasture, olive trees, huts</li> </ul>

### *Appendix B: Meeting minutes*

Minutes of the meeting of the Governorate of Sidi Bouzid

Date and time of meeting: May 8, 2025		Location: Sidi Bouzid Governorate	
List of participants			
Participant	Organization	Participant	Organization
Governor of Sidi Bouzid	Public	Amami Leila	TP district soil CRDA
Secretary General of the Governorate of SBZ	Public	Ibrahim Jallouli	Environment
Mohamed ben Jaballah	Regueb and Mazzouna Delegate	Omar Bey	Head of Institutional Relations QAIR
Abdelhamid Khalfallah	Director of Energy Transition and , Ministry of Energy	Marrouch Barhoumi	ANME sidi Bouzid
Mounir Hamdi	State Property	Abdelhakim Samhoun	Mazzouna Local Council
Slaheddine Khammassi	STEG Meknessi District	Aymen Tahri	SBZ Regional Council
Mounir Hamdi	State Domains	M'hadheb Messaadi	SBZ Regional Council
Chokri Ouji	SBZ Regional Development Council	Mohamed Dlela	Mazzouna Local Council
Raja Affi	Regional Development	Chawki Ben Amor	Mazzouna Local

			Council
Anis Ghazel	Agriculture Commissioner	Noureddine Elghali	Omda Khobna
Takwa Dhehibi	Regional Equipment Directorate	M'hadheb Messaadi	SBZ Regional Council
Nizar Ouertani	Environmental Expert	Mehdi Benchelbi	E&S Expert
Aroua Mestiri	Social Specialist	Mariam Soula	E&S Expert
Hassane Mouri	Social Expert		
<b>(Agenda)</b>			
Public consultation meeting with stakeholders			
<ul style="list-style-type: none"> <li>- Summary presentation of the project</li> <li>- Discussion on each stakeholder's commitments to accelerate project implementation</li> </ul>			
<b>(Points discussed)</b>			
<p>The governor of Sidi Bouzid welcomed all participants to the consultation meeting on the project to install a photovoltaic station in Khobna, Mazzouna delegation, and a 45.5 km transfer line to connect the production station with the STEG lines running from Mezzouna to the Meknassi delegation.</p> <p>After specifying that the purpose of this public meeting was to review the main points of the project, the floor was given to the ASF Consulting design office for a technical presentation of the project in the presence of Mr. Omar Bey, the representative of Quair.</p> <p>The public consultation meeting with stakeholders was chaired by the governor:</p> <p>He emphasized the importance of cooperation between all institutional stakeholders and the consulting firm in order to successfully complete this stage of the project.</p> <p>The regional director of State Domains and Land Property recalled the number of the plot of land covered by the project: 52,732, and that the project covers 270 hectares of State land. He emphasized the importance of completing the file, especially the contract signed with Quair to finalize the procedures for granting the plot to the operator. He also expressed his motivation for the project's implementation.</p> <p>The Commissioner for Agricultural Development (CRDA) also expressed his willingness to see the project through and his readiness to cooperate with the design office and Quair in collecting data and other information.</p> <p>Representatives of the regional and local population also expressed their willingness to cooperate with the project unconditionally.</p> <p>The governor of Sidi Bouzid instructed the members of the regional council to accompany the experts on a technical, social, and environmental reconnaissance mission to Mazzouna.</p> <p>The debate also raised questions about development in the sustainable energy sector and its impact on the development of the region and the country.</p> <p>The governor concluded the public consultation by urging all regional and local officials and elected representatives to cooperate with the project, each within their own remit, to ensure its success .</p> <p>He also reminded the research firm to hold another session to present the study's findings.</p>			
<b>(Actions to be taken)</b>			
<ul style="list-style-type: none"> <li>- Complete the field mission</li> <li>- Submit requests for information to the organizations present at the meeting, if necessary</li> <li>- Be available to all project managers to clarify any issues</li> <li>- Complete the study on time to avoid delays</li> </ul>			



بطاقة حضور

جلسة عمل: تقديم الدراسة المؤثرات البيئية والاجتماعية "مشروع إنشاء وصيانة محطة الطاقة الشمسية الكهروضوئية بقوة 198 ميغاواط بالمزونة" يوم الأربعاء 07 ماي 2025 على الساعة العاشرة صباحا.

الاسم واللقب	الصفة	رقم الهاتف/ الفاكس	البريد الالكتروني	الإمضاء
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PUBLIC

<b>Date of meeting: May 9, 2025</b> <b>Time of meeting: 10:30 a.m.</b>		<b>Location: CRDA Sidi Bouzid</b>
<b>List of participants</b>		
<b>Participant</b>		<b>Organization</b>
Hassib ABDELLI		Head of Forestry Department
Mehdi BENCHELBI		ASF Consulting
Aroua MESTIRI		ASF Consulting
Mariem SOULA		ASF Consulting
<b>(Agenda)</b>		
Presentation of the project and request for information on the boundaries of Bouhedma National Park.		
<b>(Points discussed)</b>		
<ul style="list-style-type: none"> <li>• Presentation of the project by our team.</li> <li>• Request for access to digital data relating to the boundaries of Bouhedma Park.</li> <li>• The manager informed us that no digital data is currently available at their level.</li> <li>• Reference was made to Article 222 of the Forest Code.</li> <li>• We were given the contact details of the Director General of Forests (DGF) for further information.</li> </ul>		
<b>(Actions to be taken)</b>		
Contact the Director General of Forests (DGF) to obtain the necessary information on the boundaries of Bouhedma Park.		

### **Article 222 (Modifié par la loi n°2009-59 du 20 juillet 2009)**

La construction d'équipements de transport et de communications et l'installation de conduites de liquides et de gaz, et de lignes électriques et téléphoniques qui doivent impérativement passer un parc national ou une réserve naturelle, ne peuvent être exécuter qu'après conclusion d'un contrat de concession à cet effet, conformément aux dispositions de l'article 75 du présent code.

Figure12 : Article 222

*C: Photos taken during the site visit*

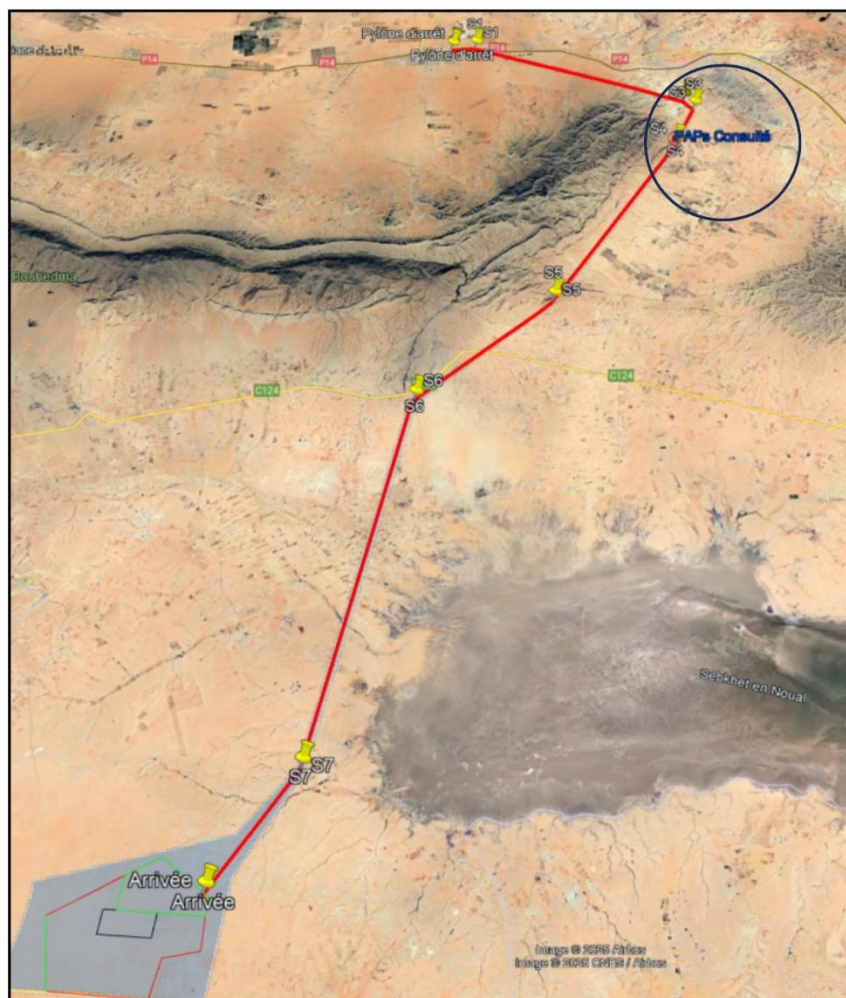


Figure13 : Location of landowners near Djebel Bouhedma





*Figure14 : Presence of rodents at the project site*





*Figure15 : Private properties along the boundaries of Djebel Bouhedma*



*Figure16 : Railway line between P3 and P4*





Figure17 : Photos of the meeting at the Sidi Bouzid Governorate



*Figure18 : Visit to the section between P4 and P5*



Appendix D: Discussion with a family affected by the line **Discussion with a family affected by the line – Arch Jenf**

During the field visit, the team met with a single large family belonging to Arch Jenf. The patriarch of this family, M'hadheb (deceased), was the original owner of the land, which has now been passed on to his descendants. The land is titled, and the current owners are uncles, sisters, and sisters-in-law. The family structure includes six brothers and sisters. The dwellings are located near a wadi, whose floods make access to the site difficult during periods of heavy rain. Under these conditions, the family can remain isolated for several weeks. Economically, some families raise sheep, but this activity is not widespread. The immediate neighbors are families who also farm olive groves in the area.



*Figure 19 : Propriétés privées de Arch Jenf*