



Qair

Khobna 237 MWp Photovoltaic Power Plant



Stakeholder Engagement Plan



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1	Introduction.....	1
1.1	Background and project description	1
1.2	Objective of the PEPP	1
2	Regulatory and institutional framework.....	3
2.1	National legal requirements	3
2.	Donor requirements regarding stakeholder engagement.....	4
2.3	Convergences and divergences between national and international regulations.....	5
3	Identification and analysis of stakeholders	9
3.1	Mapping methodology	9
3.2	List of stakeholders	9
3.3	Stakeholder mapping	10
3.4	Vulnerable groups:	15
3.4.1	Definition.....	15
3.4.2	Identification methodology	15
3.4.3	Recommended approach.....	16
4	Summary of previous consultations	17
4.1	Consultation activities already carried out	17
4.1.1	Methodological approach	17
4.1.2	Consultations with stakeholders	18
4.2	Additional consultations and ongoing coordination	21
4.	Consultation plan.....	22
5	Stakeholder engagement strategy and information disclosure	24
5.1	Specific engagement objectives:	24
5.2	Documents to be published.....	25
5.3	Languages of publication	25
5.4	Distribution channels	25
5.5	Availability information procedures	25
5.6	Information disclosure plan	27
6	Complaint management mechanism (CMM)	28
6.1	Introduction and objectives	28
6.2	Types of complaints handled	28
6.3	How the MGP works.....	28
6.4	Complaint handling process.....	29
6.5	Complaint Monitoring, Evaluation, and Reporting	36
6.6	Commitment of the developer	37
6.7	Specific mechanism for handling complaints related to GBV.....	38
7	Monitoring, reporting, and updating	41
7.1	Performance indicators for the commitment.....	41

7.2	Periodic reports	42
7.3	PEPP update	42
8	Organization and responsibilities	43
8.1	PEPP governance structure	43
8.2	Division of responsibilities	43
9	Indicative budget	44
	Appendices	45
	Appendix 1: Minutes of meetings and photos taken during meetings and visits:	45
	Appendix 2: Complaint form	59
	Appendix 3: Complaint closure form	60
	Appendix 4: GBV complaint registration form	61
	Appendix 5: Complaint register	63

List of figures

Figure 1	Complaint management mechanism process	36
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List of Tables

Table 1	Convergences and divergences between national and international regulations	7
Table 2	Stakeholder mapping	12
Table 3	Means of integrating vulnerable groups into the PEPP	15
Table 4:	Record of consultations carried out	19
Table 4	Consultation plan	22
Table 6	Information disclosure and consultation plan	27
Table 6	MGP stage deadlines	35
Table 7	Stakeholder engagement performance indicators	41

1

1.1 Background and Project Description

The Tunisian Solar Plan (PST) aims to strengthen the national energy transition by promoting renewable energies and reducing dependence on fossil fuels. It reflects Tunisia's ambition to establish itself as a regional platform for green electricity production, drawing on its natural resources, particularly the strong solar potential in the center and south of the country.

In this context, the Ministry of Industry, Energy, and Mines has launched a national call for tenders for the production of electricity from renewable sources, under the concession regime. The Qair Group, an international operator specializing in renewable energy, has been selected to develop a 237 MWp solar photovoltaic power plant project in the Sidi Bouzid region.

The project involves the construction of a solar power plant located in the Mezzouna delegation, Sidi Bouzid governorate, on land belonging to the state. The proposed site is spread over several plots totaling approximately 276 ha, located about 12 km from the center of Mezzouna. The electricity produced will be fed into the national grid via a transmission line connecting the site to the STEG substation in Mezzouna, approximately 9 km away. The exact route of the connection line is currently being defined and will be included in the environmental study.

In order to ensure that the project complies with Tunisian regulatory requirements and international standards, the Qair Group has commissioned the engineering firm ASF Consulting to carry out a comprehensive Environmental and Social Impact Assessment (ESIA). This study includes an Environmental and Social Management Plan (ESMP), a Stakeholder Engagement and Participation Plan (SEPP), and a Land Acquisition and Resettlement Framework, in accordance with the requirements of the International Finance Corporation (IFC), the European Bank for Reconstruction and Development (EBRD), and the European Investment Bank (EIB).

This mission aims to ensure responsible, inclusive, and sustainable implementation of the project, based on rigorous identification of potential impacts, transparent consultation with stakeholders, and the adoption of environmental and social management measures adapted to the local context.

1.2 Objective of the PEPP

This Stakeholder Engagement Plan (SEP) has been developed as part of the development of two solar photovoltaic power plant projects located in El Khobna (Sidi Bouzid governorate) and El Ksar (Gafsa governorate) in Tunisia. These projects, led by the Qair Group under the private concession scheme, are fully in line with the national energy transition strategy and receive joint financial support from the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB), and the International Finance Corporation (IFC).

The preparation of these PEPPs aims to ensure a structured, inclusive, and transparent stakeholder engagement process, in line with the requirements of EBRD Performance Requirement 10 (PR10), as well as EIB NES 2 and IFC Performance Standard 1 (PS1) relating to stakeholder information and participation. It is also based on international best practices in environmental and social sustainability.

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

The objectives of this PEPP are therefore to:

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

2 Regulatory and institutional framework

2.1 National legal requirements

In Tunisia, the regulatory framework for stakeholder participation is constantly evolving, with notable advances in the recognition of the right to citizen participation, although a structured and binding mechanism specifically dedicated to infrastructure projects or environmental and social impact assessments (ESIAs) is not yet in place.

Article 38 of the Tunisian Constitution, amended in 2022, guarantees the right of access to information. Article 139 requires local authorities to adopt participatory democracy mechanisms, enabling citizens and civil society to contribute to the development, monitoring, and evaluation of development projects. These provisions are reinforced by Organic Law No. 2018-29 of May 9, 2018, on the Local Authorities Code, which establishes a legal basis for citizen participation in local decision-making processes, including through consultations, advance publication of draft decisions, suggestion registers, and even local referendums.

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

In terms of environmental assessment, Decree No. 2005-1991 on environmental impact assessments (EIA) remains the regulatory reference. This decree requires public consultation for projects subject to EIA, but does not specify the terms of public participation or specific measures to be taken in favor of vulnerable groups or gender. In-depth social analysis, complaint management, and ongoing stakeholder participation are not explicitly regulated by national legislation.

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

In addition, Organic Law No. 2016-22 on the right of access to information provides that any citizen may request information relating to public projects. Each public entity is required to appoint a person responsible for access to information, and an independent body

In the field of local development and energy transition, Tunisia has gradually integrated the principles of citizen participation through various reforms and decentralization initiatives. These dynamics are part of a broader desire to bring citizens closer to decision-making processes, particularly in the planning and monitoring of structural projects, such as energy infrastructure. Local authorities, regional government representatives, and civil society are playing an

increasingly active role in identifying needs, promoting regional consultation, and facilitating dialogue on the social and environmental impacts of projects.

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

2.2 Lender requirements for stakeholder engagement

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

EES10 – EBRD: Stakeholder Engagement

According to EES 10, stakeholder engagement is an ongoing process that should begin in the early stages of the project. It involves:

- Identifying affected and interested parties, with particular attention to vulnerable groups;
- Disclosure of relevant information about the project in a culturally appropriate language and format;
- Meaningful consultation, based on clear information, available before any final decisions are made;
- The establishment of a Stakeholder Engagement Plan (SEP) tailored to the project's risks and
- Continuous communication throughout the project cycle, including regular reports to affected parties.

Standard 2 – EIB: Stakeholder Dialogue

The EIB considers stakeholder dialogue to be an inclusive, structured, and iterative process that aims to:

- Ensure access to information, participation in decision-making, and access to grievance mechanisms;
- Identify and analyze stakeholders, including vulnerable and marginalized groups;
- Implement a rights-based grievance mechanism free from intimidation and reprisals;
- Develop a Stakeholder Engagement Plan (SEP) or equivalent, including consultation,

monitoring, and adaptation procedures;

- Maintain ongoing and constructive dialogue, documenting contributions and adjusting measures taken

NP1 – IFC: Stakeholder Engagement and Sustainable Performance

IFC Performance Standard 1 emphasizes:

- Integrating community participation into the project's Environmental and Social Management System (ESMS);
- The need to consult Affected Communities on risks, impacts, and mitigation measures from the earliest stages of the project;
- The establishment of a free, prior, and informed consultation process tailored to the specific characteristics of the communities (language, culture, vulnerability);
- The obligation to maintain open channels of communication throughout the project life cycle and to ensure effective access to a grievance mechanism;
- Disclosure of relevant information about the project (impacts, measures, timeline, participation mechanisms) in accessible and understandable formats.

Alignment with standards

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

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

2.3 Convergences and divergences between national and international regulations

In order to assess the level of alignment of the Tunisian regulatory framework with the requirements of international donors (EBRD, EIB, IFC), a comparative analysis was conducted on the themes of consultation, stakeholder engagement, and complaint management mechanisms.

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

The table below summarizes this comparison, distinguishing for each standard the key requirements, the gaps identified in the Tunisian context, and the corrective measures

proposed to ensure that the Gafsa and Khobna projects comply with international standards on participatory governance and grievance management.

Table1 Convergences and divergences between national and international regulations

Theme	Tunisian E&S regulations	EBRD requirement (EES)	IFC requirement (PS)	EIB requirement (ESS)	Identified gap	Proposed corrective provisions
Consultation, stakeholder engagement, and grievance mechanism	Tunisian regulations provide for public consultation as part of the public inquiry (Decree No. 2005-1991), but this remains ad hoc and limited to a specific phase of the project. There is no formal framework requiring ongoing stakeholder engagement throughout the project lifecycle. Furthermore, there is no structured mechanism for managing environmental or social complaints, let alone specific provisions for dealing with sensitive complaints (e.g., gender-based violence (GBV), sexual exploitation and abuse (SEA)) or for protecting vulnerable persons (e.g., women, youth, minorities, persons with disabilities).	EES 10 requires a structured consultation process from the design phase onwards. The EBRD requires ongoing, inclusive, and accessible consultation with stakeholders, including vulnerable groups. It mandates the implementation of a Stakeholder Engagement Plan (SEP) and a Complaints Handling Mechanism (CHM) commensurate with the risks of the project. This mechanism must include specific measures for handling sensitive gender-related complaints (GBV/SEAH), guarantee confidentiality, survivor	PS1 and PS10 require stakeholder engagement and ongoing communication. The IFC requires proactive engagement with stakeholders, based on the identification of risks and vulnerabilities. The complaint management mechanism must be tailored to specific risks, including sensitive complaints (GBV/SEAH), and allow equitable access to all groups, including marginalized populations. It must provide for confidential procedures, referral to specialized	ESS10 provides for prior consultations, ongoing participation mechanisms, transparent access to information, and a complaint mechanism in line with best practices. The EIB requires the preparation of a PEPP based on a stakeholder analysis and particular attention to vulnerable groups. The MGP must cover all E&S complaints, including those related to gender-based violence and exploitation. It must be secure, accessible, confidential, include risk	The Tunisian framework does not guarantee a structured commitment or a functional complaint mechanism throughout the project. There is no specific mechanism for handling sensitive complaints (GBV/SEAH) or ensuring the accessibility of the process for vulnerable groups. There is also a lack of guidelines on confidentiality, non-retaliation, and care for survivors or people in vulnerable situations.	Develop a project-specific PEPP that includes mapping vulnerable stakeholders and an inclusive commitment. Set up an appropriate, confidential, multi-channel (oral, written, online) GRM, including specific provisions for sensitive complaints (GBV/SEAH), with referral to specialized structures. Train staff, raise awareness among communities, and ensure the system is accessible to marginalized groups (language, disability, gender, etc.).

		safety, and non-retaliation, while ensuring accessibility for vulnerable individuals.	services, and case follow-up.	management measures for vulnerable complainants, and provide support for survivors.		
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3 Identification and analysis of stakeholders

3.1 Mapping methodology

The identification of stakeholders in the El Khobna (Sidi Bouzid) photovoltaic power plant project was based on a participatory and contextualized approach, integrated into the institutional framing and field reconnaissance work carried out between April 22 and July 11, 2025. The aim was to ensure a comprehensive understanding of the social, environmental, and land issues related to the project and to enable the gradual mobilization of the actors concerned.

The main stages of the approach were as follows:

- **Preliminary institutional analysis:** an initial hypothesis of the stakeholders was established based on the regional and local institutional structure, taking into account the relevant services (CRDA, Forestry Department, Governorate, etc.) and land authorities.
- **Institutional consultations:** Several meetings were organized with representatives of the Governorate of Sidi Bouzid, the CRDA (soil, water, forests, conservation), the Directorate of Domains, the municipality of Mezzouna, the delegations of Meknassy and Mdhila, and the services of the Ministry of the Environment. These exchanges provided an opportunity to gather regulatory observations, technical data, and recommendations on authorization procedures and conservation issues.
- **Community meetings:** Discussions were held with local representatives (Omda of Khobna, Omda of Charkiya and Gharbiya, families of Arch Jenf, etc.) to identify grazing areas, agricultural land, access constraints, and potential conflicts of use. These meetings also facilitated the identification of informal agricultural or pastoral practices.
- **Support from local councils and the OTC:** The El Khobna Local Council, in conjunction with the Topographic and Cadastral Office, provided valuable logistical assistance and contributed to the land survey of the planned right-of-ways, in particular through the expected georeferenced files (KML).
- **Cartographic and regulatory analysis:** Discussions with Bouhedma National Park clarified the configuration of the protected area and the constraints of interference with the power line route. The relevant articles of the Forest Code were identified, particularly for possible interventions in the state-owned forest domain (

3.2 List of stakeholders

The list below includes the stakeholders identified during the project scoping phase in Sidi Bouzid. They are classified into two main categories: *affected parties* and *interested parties*.

a) Affected stakeholders

- **Families living near the site:** in particular the descendants of Arch Jenf, whose titled lands are close to the route of the line. They could be affected by access restrictions, pastoral losses, or nuisances.
- **Local farmers and livestock breeders:** in the area where the high-voltage line is located or around it, some farmers raise sheep or grow olive trees. Their activities could be temporarily disrupted.
- **Users of private state-owned land for grazing or forestry:** particularly in areas subject to forestry regulations on the outskirts of Bouhedma Park. These lands are sometimes used without formal rights.
- **Rural women and young people from neighboring villages:** although few were encountered during this first phase, they will be targeted in future consultations due to their potential vulnerability.

b) Interested stakeholders

- **Governorate of Sidi Bouzid:** as regional institutional coordinator, it supported the scoping mission and facilitated access to technical services.
- **CRDA of Sidi Bouzid:** through its various departments (soil, water resources, soil conservation, forests), it provided maps, data, and recommendations on environmental risks.
- **Forestry Department (DGF and DRF Mezzouna):** parties concerned by possible encroachment in classified forest areas or in the immediate vicinity of Bouhedma Park.
- **Topographic and Cadastral Office (OTC):** key contact for land tenure analysis and the generation of georeferenced layers.
- **Regional Directorate of State Property:** responsible for allocating the 270 ha of state-owned land earmarked for the power plant.
- **Municipality of Mezzouna, local councils, Omda:** involved in information relay, logistical support, and social coordination.
- **Ministerial technical services:** Regional Directorate for Health, Energy Transition, Environment, and Agriculture.
- **Qair Tunisia:** project owner, involved in all consultations.

3.3 Stakeholder mapping

Cross-analysis of the level of influence and the level of interest makes it possible to prioritize stakeholder involvement in the engagement process, according to their ability to influence the project and their degree of concern or impact. This mapping is the result of:

- A preliminary document review (land registry, easement plan, technical documents),
- Coordination meetings organized in Sidi Bouzid (with the Governorate, the CRDA, the

DGF, the DR of Health, etc.),

- Field visits to the areas affected by the power plant and the high-voltage line (Douar Douara, Arch Jenf, Sebkha Ennaouel, Bouhedma Park),
- And direct discussions with affected families.

The results are summarized in the following table

2 Stakeholder mapping

Stakeholder and PAPs	Role in the project (presentation + role)	Level of influence	Level of interest	Proposed method of engagement
Qair Tunisia (promoter)	Company responsible for the development, financing, and implementation of the project. Role: bearer of contractual, technical, environmental, and social obligations.	High	High	Ongoing dialogue (weekly), direct supervision, monthly internal reporting
EBRD/EIB/IFC (lenders)	Financial institutions co-financing the project. Role: validation of E&S documents, compliance with standards, contractual monitoring.	High	Medium	Quarterly reporting, semi-annual supervision meetings, audits
Governorate of Sidi Bouzid	Regional representation of the State. Role: inter-institutional coordination, administrative and political support.	High	Medium	Quarterly institutional meetings, involvement in monitoring committees
Municipality of Mezzouna	Local authority covering the project area. Role: local liaison, logistics, community mediation.	Medium	High	Monthly coordination meetings, posters, public consultation
Directorate General of Forests (DGF)	National authority responsible for forest conservation. Role: regulatory validation, protection of sensitive environments.	High	Medium	Ad hoc technical meetings, authorizations, cartographic support (as needed)
CRDA Sidi Bouzid	Regional structure of the Ministry of Agriculture. Role: technical support, land data, thematic coordination.	Medium	High	Quarterly sectoral meetings, support for data collection
CRDA – CES (Water Conservation and Soil)	Role: prevention of erosion and flooding risks.	Medium	High	Half-yearly technical meetings, hydrological consultations
CRDA – Soil District	Management of agricultural land use. Role: classification,	Medium	High	Technical meetings, land mapping

	agricultural uses, technical advice.			
Regional Directorate of State Property	Clarification of the legal status of land. Role: land regularization, conflict management.	High	Medium	Land meetings, transmission of plans, KMZ files
National Heritage Institute (INP)	Conservation of tangible and intangible heritage. Role: prevention of damage, archaeological monitoring.	Medium	Medium	Official consultation, request for notices, monitoring
SNCF	Management of the railway domain. Role: validation of temporary or permanent easements.	Medium	Medium	Technical meetings, document exchanges, legal support
STEG	Electricity connection company. Role: validation of the high-voltage line route, technical coordination.	High	High	Technical meetings, plans, operational coordination
Local NGOs	Civil society actors involved in the field. Role: community liaison, support for vulnerable groups.	Medium	High	Quarterly community meetings, biannual awareness-raising, annual focus groups
Social services (women, youth, social affairs)	Regional branches of social ministries. Role: support for vulnerable groups, management of GBV/precariousness.	Low	High	Sectoral meetings, coordination, joint workshops
Tunisian Union of Agriculture and Fisheries (UTAP)	Professional representation of farmers. Role: land mediation, reporting concerns.	Med	High	Thematic meetings, mobilization, mediation
Local residents	Communities close to the power plant and power lines. Role: potentially affected, beneficiaries of spin-offs.	Low	High	Quarterly public meetings, biannual awareness campaigns, posters, door-to-door visits, NGO relays
Family in the Arch Jenf	Family occupying titled land near the high-voltage line. Role:	Low	High	Occasional individual interviews,

project area	potentially affected (land, isolation).			ongoing land mediation, specific annual monitoring
Local livestock farmers (including Bouhedma)	Informal users of affected pastoral lands. Role: temporary or permanent loss of access.	Low	High	Half-yearly community meetings, annual targeted awareness-raising, NGO relay
Local farmers	Farmers affected by land acquisition. Role: potential disruption of activities, need for compensation.	Medium	High	Ad hoc land surveys, annual information meetings, ongoing PAR coordination
Communities of Douara and El Khobna	Main communities living near the power plant site. Role: project beneficiaries, but concerned about impacts.	Low	High	Quarterly community meetings, municipal and CRDA relays, permanent signage

3.4 Vulnerable groups:

As part of the development of the Stakeholder Engagement Plan (SEP) for the El Khobna photovoltaic power plant project, the identification of vulnerable groups is an essential step in ensuring equitable inclusion and effective participation of all population groups, particularly those that are often marginalized or exposed to disproportionate risks in infrastructure projects.

3.4.1 Definition

According to international standards (EBRD PR10, IFC PS1, EIB ESS10), a vulnerable group refers to any population or subgroup of the population that may encounter barriers to accessing information, consultation, or grievance mechanisms, and whose livelihoods, safety, or dignity could be disproportionately affected by the project.

3.4.2 Identification methodology

The identification of vulnerable groups for the Sidi Bouzid project is based on a cross-cutting approach combining:

- Consultations with local authorities, social structures (women's delegation, social affairs, youth), representatives of the local council of El Khobna, the municipality of Mezzouna, and community NGOs present in the area;
- Field visits carried out between June 17 and 20, 2024, particularly in the areas where the power plant will be located and along the planned route of the high-voltage line;
- The socio-economic analysis carried out as part of the scoping report, including information on precariousness, geographical isolation, limited access to public services, and dependence on agriculture or extensive livestock farming in the Douara and Khobna areas;
- The direct identification of certain affected families, such as the Arch Jenf family, encountered along the route of the high-voltage line, whose living conditions and access to services are precarious.

Table3 Means of integrating vulnerable groups into the PEPP

Vulnerable group	Justification	Potential risks associated with the project	Means of integration into the PEPP
Rural women	Limited access to information, heavy dependence on agriculture and informal work, low representation in local authorities	Exclusion from consultations, excessive family responsibilities, loss of employment or compensation opportunities	Focus groups in local dialect, mobilization of women's associations (e.g., rural women of Mazzouna), involvement via local social networks
Isolated elderly people	Social isolation, precariousness, low mobility, dependence on family	Difficulty traveling to meetings, forgetfulness or negligence in compensation and access to project services	Home visits during awareness campaigns, involvement of neighborhood committees, use of community intermediaries
Households without land titles	Presence of informal occupants on land, particularly in pastoral or agricultural areas	Exclusion from compensation, risk of land disputes, legal uncertainty	Preliminary census with local authorities, application of the principle of inclusion even without title, support for regularization if possible

Pastoralists	Mobile population in the Douara and Mezzouna areas, heavy dependence on grazing land and water points	Disruption of traditional routes, loss of access to grazing areas	Land dialogue sessions, participatory mapping, proposal of alternative routes or appropriate compensation
Unemployed youth	High unemployment in rural areas, high expectations of investment projects	Risk of frustration, generational conflict, exclusion from decision-making processes	Targeted information campaigns, mobilization of local youth centers, integration into project-related training or recruitment initiatives
Isolated families (Arch Jenf, etc.)	Precarious housing, geographical isolation, limited access to services	Risk of being overlooked in compensation or consultations, limited access to remedies	Individual registration by the ACL, site visits, social support, relay via local NGOs
People with disabilities	Marginalization, mobility difficulties, lack of access to traditional communication channels	Exclusion from consultations, difficulty expressing concerns	Accessible information materials, adaptation of meeting places, use of social services for specific support

3.4.3 Recommended approach

The Khobna project's PEPP incorporates a differentiated approach for these groups, based on:

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

4 Summary of previous consultations

4.1 Consultation activities already carried out

As part of the preparation of the Stakeholder Engagement Plan (SEP) for the Sidi Bouzid (Khobna) photovoltaic power plant project, several consultation activities were carried out during the scoping phase of the Environmental and Social Impact Assessment (ESIA). These activities laid the foundations for the current PEPP by establishing a structured dialogue with the main institutional, local, and community stakeholders.

In particular, they made it possible to:

- Present the project's objectives and components at the regional level;
- Identify the main environmental, social, and land-use constraints of the site;
- Discussing the terms and conditions for access to information, monitoring, and consultation;
- Gather useful opinions to guide the next stages of the study.

The summary below details the methodology used and the results of the consultations conducted between April and July 2025.

4.1.1 Methodological approach

The consultation process was built around three areas: in-depth field visits, institutional meetings, and targeted collection of technical information. The objective was to cross-reference field observations with institutional feedback in order to enrich the socio-environmental diagnosis and anticipate engagement needs.

The key stages of this approach were:

- **Preliminary documentary analysis:** An initial analysis of existing data (site plans, risk studies, land documents, hydrological and pedological maps) was conducted to identify sensitive areas along the route.
- **Initial field mission:** Carried out in April 2025, this mission involved visiting the power plant and transmission line sites (approximately 45 km), observing local conditions (access, land use, proximity to homes, nature of the land), and meeting with local residents (notably the Arch Jenf family).
- **Targeted institutional consultations:** Several meetings were organized with the Governorate, the CRDA (soil, forests, CES, water), the State Property Department, the Regional Environment Directorate, the STEG, the Bouhedma Park Directorate, and the INP. These discussions made it possible to assess the project's implications in terms of land, ecology, technology, and heritage , identify missing data (KMZ files,

hydrological maps), and initiate a collaborative process.

- **Governorate meeting:** A strategic meeting chaired by the Governor of Sidi Bouzid brought together all the institutions concerned and initiated operational coordination at the regional level.
- **Meetings with local stakeholders:** With the support of the El Khobna Local Council and the Omdas of Gharbiya and Charkiya, several meetings were organized with local families and users of the land crossed by the high-voltage line.
- **Specific exchange with the Bouhedma Park conservator:** A meeting and a field visit were organized to assess the potential impact of the project on the park's ecosystems and its surroundings (particularly the Halfa and protected species).

4.1.2 Consultations with stakeholders

These consultations helped build a shared understanding of the project's objectives and potential impacts. They also laid the groundwork for ongoing consultation throughout the rest of the study and during the implementation phases.

The main results of these discussions can be summarized as follows:

- **The Governorate of Sidi Bouzid** expressed its support for the project and mobilized all regional services to facilitate access to data and sites.
- **The Sidi Bouzid CRDA**, through its various departments (soils, forests, CES, water resources), shared several technical maps and provided details on soil types, land use, and environmental constraints, emphasizing the need to respect existing CES developments.
- **The forestry department** and the **Bouhedma Park conservator** stressed the importance of not encroaching on the classified perimeter and recommended compliance with the provisions of the Forest Code, particularly in the case of development in the forest area.
- **The Regional Directorate of State Property** confirmed that the land earmarked for the power plant is public property (plot 52 732) and proposed to speed up the allocation procedure to Qair.
- **The OTC (Office of Topography and Cadastre)** undertook to provide a georeferenced KML file showing the land distribution of the plots crossed, which will facilitate the development of the Land Acquisition and Resettlement Framework (CATR).
- **Social and health services**, as well as **local elected officials (municipality, regional council, local councils of Khobna and Mezzouna)**, expressed their willingness to contribute to raising awareness and supporting the populations concerned.
- **An informal meeting was also held with the Arch Jenf family**, who live in the

immediate vicinity of the transmission line. This family is composed of descendants of the patriarch M'hadheb, whose land is now farmed by his children and their spouses. Their homes are at risk of isolation in the event of flooding of the nearby wadi. Some families raise sheep and cultivate olive trees. They expressed concern about the project's impact and the need to preserve access to their land.

These consultations have made it possible to identify the main risks and expectations associated with the project, strengthen coordination with local authorities, and lay the foundations for a transparent and equitable engagement process, in accordance with international standards (EBRD, IFC, EIB).

Table4 : Record of consultations carried out

Date	Meeting	Stakeholders consulted	Main points discussed	Actions to be taken
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May 8, 2025	Meeting at the governorate of Sidi Bouzid	Governorate, CRDA, State Property Agency, ANME, STEG, Regional Council, Energy Transition Department, Mezzouna Local Council, Omda Khobna, Mazzouna Delegation, Qair Group	Presentation of the project and the ESIA process, confirmation of the land's state ownership status (plot no. 52,732), institutional support, no objections from community representatives	Finalize field mission, collect missing institutional data, plan for reporting
05/09/2025	Meeting with the water resources district	Head of the Water Resources District – CRDA Sidi Bouzid	Presentation of the project, absence of a buffer zone, access to topographical and groundwater maps, data on salinity and falling groundwater levels	Conduct flood risk assessment, plan temporary acquisition, obtain available hydrological maps
09/05/2025	Meeting with the CES district	Head of CES district – CRDA Sidi Bouzid	ESIA methodology, need to avoid impacting CES structures, possible rehabilitation in the event of bench allocation, no active CES structures on the power plant site	Identify any CES structures on the route, plan rehabilitation measures if necessary
09/05/2025	Meeting with the Sol district	Head of the Sols district – CRDA Sidi Bouzid	Agricultural use of land, importance of preservation even in the event of easement, erosion risks, sharing of soil maps, suitability and use	Incorporate maps and recommendations into the E&S assessment.
	Meeting with the Forêts district	Head of the Forêts district – CRDA Sidi Bouzid	Reference to Article 222 of the Forest Code, lack of digital data on Bouhedma Park, necessary coordination with the DGF	Contact the DGF to obtain official boundary data
May 10	Meeting with the Meknassi Forestry Department	Director of Forest Conservation	Visit to the park and protected areas (Addax, Oryx), confirmation of the forest domain's	Study other route options and their technical and

			footprint on the mountains, route outside the park, option of establishing a site in the forest domain	institutional feasibility
07/09/2025	Meeting with the National Heritage Institute (INP)	INP curators (Bir El Hafey), ASF Consulting (Aroua Mestiri, Mehdi Benchelbi)	Presentation of the QAIR project and the design office's mission, discussion on the archaeological heritage discovered in Khobna, location of the Roman site (basins), assessment of potential impacts	Joint field visit to view the archaeological site and discuss development issues

4.2 Additional consultations and coordination underway

In order to ensure a complete understanding of the project's challenges and inclusive participation, additional consultations are planned with stakeholders who have not yet been met. These actions will make it possible to fill any gaps identified during the first phase and to ensure the gradual buy-in of the actors concerned.

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

Regular meetings are held between the ASF Consulting team and the developer Qair to share findings from the field, incorporate institutional comments, and validate technical scenarios as studies progress.

These meetings also provide a forum for strategic coordination between the various components of the ESIA (hazard study, biodiversity, land use, CPR, etc.) to ensure the consistency of the Stakeholder Engagement Plan with other deliverables.

- **Coordination with donors:**

Discussions are planned with the project's international lenders (notably the EBRD, IFC, and EIB) to ensure that the consultation process is aligned with international standards (EES10, PS1, ESS10). A joint meeting with ASF Consulting, Qair, and donors will be organized to share the initial results of the consultation, discuss specific expectations, and adjust the PEPP roadmap in line with the overall ESIA schedule.

4.3 Consultation Plan

The consultation process under the PEPP is based on institutional meetings, community exchanges, and targeted activities aimed at ensuring the effective involvement of stakeholders at each stage of the project. The main objective is to gather the expectations, concerns, and proposals of local populations, vulnerable groups, authorities, and civil society in order to facilitate the integration of these elements into the design and implementation of the project.

This mechanism also aims to identify community representatives, ensure transparency in decision-making, and establish ongoing dialogue between the developer, authorities, and communities.

Table5 Consultation plan

Project phase	Consultation objectives	Proposed methods	Location/Schedule	Targeted stakeholders	Responsibilities
Design phase	Institutional framing, identification of expectations	Institutional meetings (governorate, CRDA, delegations), monthly meetings, launch workshops	Sidi Bouzid/Khobna – March–April 2025	Regional authorities, technical services, civil society	ASF Consulting & Qair
Design phase	Early community involvement	Community meetings, focus groups, mobilization of local leaders	Sidi Bouzid and neighboring municipalities – April–May 2025	Local population, community leaders, local NGOs	ASF Consulting & community relays
Design phase	Presentation of preliminary ESIA and PEPP results	Targeted feedback meetings (3–4 regional sessions), dissemination of summaries via printed materials and website – frequency: ad hoc per study milestone	Sidi Bouzid / Meknassy / Mezzouna – May–June 2025	Technical services, NGOs, local authorities	ASF Consulting (ESIA/CPR/PEPP) & EAM
Before work begins	Targeted consultation with vulnerable groups	Neighborhood meetings, mobilization of community leaders, sessions in dialect, at the start and then annually	Riverside villages – TBD	Women, elderly people, GDAs, young people	Qair & local authorities

	Social monitoring and grievance management; measurement of perceived impacts	Periodic community meetings (quarterly), focus groups, mobilization of social intermediaries,	Areas close to the construction site – TBD	Affected population, local NGOs, neighborhood committees	Qair & construction companies, ASF support
Construction phase	Dialogue around job offers, management of local tensions	Participatory meetings, awareness raising, coordination with local structures	Neighboring municipalities – TBD	Young people, unemployed people, municipal representatives	Qair & construction companies
Operational phase	Post-construction E&S monitoring, community feedback	Community meetings, feedback sessions, regular listening points	Khobna / neighboring municipalities – TBD	Community representatives, technical services	Qair with occasional support from E&S consultants

5 Stakeholder engagement strategy and information disclosure

5.1 Specific engagement objectives:

The stakeholder engagement and information disclosure strategy aims to ensure clear, inclusive, and ongoing communication with all stakeholders involved in the Khobna (Sidi Bouzid) solar photovoltaic power plant project throughout its life cycle (preparation, construction, operation, decommissioning).

In line with a participatory governance approach and in compliance with the requirements of lenders (EBRD, IFC, EIB), this strategy has the following specific objectives:

- **Ensure equitable access to information:**

Provide understandable, up-to-date information tailored to different audiences (local language, oral or visual formats) to promote accessibility, particularly for vulnerable groups (rural women, the elderly, unemployed young people, etc.).

- **Promote active and inclusive participation**

Enable all stakeholders to express their expectations, concerns, or recommendations through targeted consultations and forums for dialogue organized in the villages and municipalities concerned.

- **Enhance the transparency and accountability of the project**

Regularly share project progress, study results, decisions made, and responses to community concerns.

- **Identify and address concerns quickly**

Establish a simple, accessible, confidential, and gender-sensitive (GBV/SEAH) complaint management mechanism, particularly for vulnerable groups.

Support local ownership of the project

Promote the expected benefits of the project (employment, income, local opportunities) with a view to jointly developing mitigation measures.

Support informed decision-making

Provide local authorities, community structures, and donors with the information they need to effectively support the project.

Adapt the approach to each phase of the project

Deploy specific engagement actions according to the different stages of the project (launch, construction, post-construction), while ensuring continuous monitoring.

5.2 Documents to be published

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

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

5.3 Languages of publication

- **French:** official language for preparing and submitting documents to institutions.
- **Arabic dialect (Tunisian Darija):** language used for public consultations, popularized materials, and oral community exchanges.

5.4 Broadcast channels

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

5.5 How to find out about availability

- Posters in busy public places (town halls, souks, health centers);
- Radio spots broadcast during peak listening hours;
- Targeted text messages sent to local authorities, GDAs, and community representatives;

- Official memos to technical services and local authorities;
- Information meetings with distribution of visual aids

5.6

As part of the Khobna solar project (Sidi Bouzid), information disclosure aims to provide clear, regular, and accessible information to all stakeholders involved in each phase of the project. It helps to ensure transparency, strengthen local buy-in, and encourage informed participation, particularly among vulnerable groups.

The means of communication, the content shared, and the actors involved are chosen according to local realities: literacy levels, language, channels of access to information, and institutional presence.

The table below presents the information to be communicated, the methods of dissemination, the stakeholders involved, the provisional timetable, and responsibilities.

Table6 Information disclosure and consultation plan

Project phase	Information to be communicated	Proposed dissemination channels	Location/timeline	Targeted stakeholders	Responsibilities
Design phase	Project planning, regulatory framework, initial impacts	Radio Sidi Bouzid, inserts in <i>La Presse</i> , posters in town halls and schools, digital broadcasting	Sidi Bouzid and neighboring municipalities – April–May 2025	Local population, community leaders, local media	Qair with support from ASF Consulting
Before work begins	Final documents: ESIA, PEPP, CPR, non-technical summary	Qair site, physical deposit at town hall/delegation, health centers, official dispatch to local authorities	Sidi Bouzid / Regueb / Mazzouna – September 2025	All stakeholders	Qair
Construction phase	Project monitoring, mitigation measures, potential incidents	Periodic meetings, community notes, public notices, website updates	Areas near the site – TBD	Affected population, local representatives, affected municipalities	Qair & construction companies
Construction phase	Employment opportunities, recruitment procedures	Radio announcements, town hall notices, mobilization of community leaders and local associations	Neighboring municipalities – TBD	Young people, unemployed people, job seekers	Qair & construction companies
Operational phase	Environmental and social monitoring, community feedback	Public meetings, community relays, periodic reports to local authorities	Khobna / Regueb / Sidi Bouzid – TBD	Community representatives, GDA, technical services	Qair with ad hoc support from E&S consultants

6

6.1 Introduction and objectives

As part of the Khobna-Sidi Bouzid solar photovoltaic power plant project, a complaint management mechanism (CMM) is being set up to enable stakeholders—including local communities, workers, authorities, and other affected parties—to submit complaints, concerns, or requests for information and receive appropriate, timely, and transparent responses.

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

The objectives of the MGP are as follows:

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

6.2 Types of complaints handled

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

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

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

6.3 Operating principles of the MGP

The MGP is based on the following principles:

- **Accessibility:** free of charge, simple, linguistically and socioculturally adapted;
- **Transparency:** known process, disseminated via posters, meetings, radio;
- **Confidentiality:** discreet handling, respect for anonymity upon request;
- **No reprisals:** protection of complainants' right to freedom of expression;

- Diligence: rapid response, defined deadlines at each stage;
- Fairness: impartial treatment, consideration of vulnerable groups;
- Traceability: systematic recording in a dedicated register;
- Continuous improvement: regular evaluations and adjustments to the mechanism

6.4 Complaint handling process

Step 1: Receipt of complaints:

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

Complaints can be received through the following channels:

a) Community mechanisms in the field

- **Community relays** (e.g., Omda, members of local associations, or recognized leaders) trained to collect complaints, record them, and forward them to the E&S team;
- **Local NGO partners** involved in social or environmental monitoring of the project, with a direct link to PAPs or communities;

b) Direct channels to the project

- **Community Liaison Officer (CLO):** the **designated focal point** for the MGP, who can be reached in the field or at the local project office. The CLO keeps a log of complaints received verbally or by telephone;
- **Complaint boxes:** located in the **Bir El Hafey and Mazzouna** delegations, as well as in the affected areas (**particularly Khobna**), in accessible public places (town hall, school, health center, etc.);
- **Community meetings:** during awareness-raising workshops or consultations, a specific session is dedicated to the expression of grievances (with assistance in formulating them if necessary);

c) Remote channels

- **Telephone and SMS:** a dedicated number will be communicated to all stakeholders during upcoming awareness-raising activities;
- **Email address** dedicated to managing project complaints;
- **Electronic form** (if available), to be completed via the project website or the Qair digital platform.

d) Alternative channels

- **Complaints addressed directly to donors** (EBRD, EIB, IFC) through their independent mechanisms (IPAM, CAO, Complaints Mechanism), for individuals wishing to express themselves outside the project system;

- **Official letters** sent via delegations, the municipality, or the governorate.

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

Step 2: Recording complaints

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

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

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

All complaints are recorded in the centralized MGP register, in paper and digital format (Excel file or secure database).

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

An anonymized version of the register may be sent to donors during supervision missions, upon request.

Step 3: Acknowledgment of receipt

After the complaint has been recorded, a formal acknowledgment of receipt is issued to the complainant by the MGP focal point (the ACL) or by any other channel used by the complainant.

The purpose of this acknowledgment is to:

- Confirm that the complaint has been received;
- Inform the complainant of the reference number assigned to their complaint;
- Specify the next steps in the process;
- Indicate an estimated response time, generally within a maximum of 30 working days;
- Provide the contact details of the person (usually the ACL) who will be handling the case.
- Methods of transmission:
 - If the complaint was filed orally: immediate verbal acknowledgment of receipt is given, followed by a simplified written version as soon as possible (delivered in person or via the community liaison).
 - If the complaint was filed in writing or electronically: a signed written acknowledgment is delivered or sent by text message, email, or mail.

In the case of an anonymous complaint, a general acknowledgment of receipt may be posted publicly (in the relevant delegations or on the project website), without identifying the person. The project is committed to ensuring the availability and linguistic accessibility of the acknowledgment of receipt (in Arabic or local dialect if necessary) to enable understanding by all categories of complainants, including vulnerable persons or those with low literacy levels.

Step 4: Complaint assessment

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

The assessment aims to:

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

a) Simple/Level 1 complaints

These are complaints that are:

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

These complaints are handled directly by the ACL with the support of the E&S Manager, within a short time frame.

b) Complex/Level 2 complaints

These are complaints that:

- Involving several parties or having a collective impact;
- Require field investigation, additional consultation, or arbitration;
- Concerning cases of potential non-compliance with donor requirements or land rights.

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

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

This assessment must be completed within a reasonable time frame not exceeding 15 working days from the date of registration of the complaint, to allow for a prompt response.

Step 4: Response and resolution

After evaluating the complaint, a formal response is formulated by the project's E&S team under the coordination of the ACL, in consultation with the parties concerned. This response aims to:

- Propose a solution appropriate to the nature of the grievance;
- Clarify possible corrective actions and implementation deadlines;
- Confirm the sponsor's commitment to handling the complaint fairly and transparently.
- Processing time:
 - An official response is provided within a maximum of 30 working days from the date of registration of the complaint;
 - In exceptional circumstances requiring a longer processing time (external expertise, mediation, complex checks), the complainant will be informed in writing of the reason for the delay and the new estimated processing time.

Content of the response:

- Reminder of the complaint number;
- Summary of the complaint and the checks carried out;
- Description of the proposed corrective measures (technical, social, administrative, etc.);

- Designation of the person or structure responsible for their implementation;
- Implementation deadline and monitoring method.

Resolution methods:

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

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

Step 4 bis: Attempt at amicable settlement (preferred option)

Before any formal appeal or arbitration procedure, an attempt at amicable settlement is systematically considered. This step aims to resolve grievances in a consensual, rapid, and equitable manner, particularly those related to land occupation, compensation, or social interference.

This approach is preferred because it allows for:

- A response tailored to local and cultural specificities;
- Reduction of tensions;
- Smoother implementation of the project by limiting legal proceedings.
- Amicable settlement procedures:
- A meeting is proposed between the complainant, the ACL (MGP focal point), and the E&S Manager, in a neutral location or at the local project office;
- The proposed solution may take the form of:
 - Appropriate financial or material compensation;
 - A written commitment to modify or strengthen a social or technical measure;
 - Logistical support or specific assistance;
- The amicable solution is formalized in signed minutes (or recorded orally if the complainant does not wish to sign), with a clear mention of the agreement;
- If the complainant accepts the solution, the complaint is closed and recorded as amicably resolved;
- If the complainant refuses or contests the solution, the complaint moves on to the next

stage of the formal process (arbitration, local appeal, or appeal to donors).

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

Step 5: Response and resolution

After evaluating the complaint, a formal response is formulated by the project's E&S team under the coordination of the ACL, in consultation with the parties concerned. This response aims to:

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

Content of the response:

- Reminder of the complaint number;
- Summary of the complaint and the checks carried out;
- Description of the proposed corrective measures (technical, social, administrative, etc.);
- Designation of the person or structure responsible for their implementation;
- Implementation deadline and follow-up procedure.

Resolution methods:

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

Once the solution has been proposed, the complainant is invited to express their agreement (orally or in writing). If the solution is accepted, the complaint is considered resolved. If not, the

review or appeal process is initiated.

Step 6: Closing the complaint

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

Closure steps:

- **Closure form:** a form is completed by the ACL for each complaint, containing:
 - A summary of the complaint;
 - Actions taken;
 - The date of resolution;
 - The complainant's agreement or disagreement;
 - Any recommendations for preventing similar complaints.
- **Confirmation by the complainant:**
 - If the solution has been accepted, the complainant signs (or confirms verbally, if illiterate) the closure form;
 - If the solution is rejected, the form clearly states this, and the case is referred back to mediation or noted as unresolved, pending appeal or reassessment.
- **Archiving:**
 - All closed complaints are archived in the MGP register (paper + secure electronic version);
 - The forms are classified by delegation and by complaint category for further analysis.
- **Enhanced follow-up:**
 - Complaints concerning vulnerable individuals, sensitive cases, or recurring risks are subject to post-resolution follow-up for a specified period (minimum 3 months).
 - Field visits may be organized by the ACL or the E&S Manager to ensure that solutions are being effectively implemented.

Table 7 MGP stage deadlines

Mechanism stage	Recommended timeframe
Receipt	Complaints admissible at any time
Registration	Within 5 business days of receipt
Acknowledgment	Within 7 business days of registration
Assessment	Completed within 10 to 15 business days

Amicable settlement (preferential)	To be initiated as soon as the evaluation is complete, to be finalized within 10 business days (included in the 30 days)
Formal response and resolution	Within a maximum of 30 business days after registration
Closure and archiving	Within 7 business days after acceptance or closure
Post-resolution follow-up (if applicable)	For a minimum period of 3 months for sensitive cases

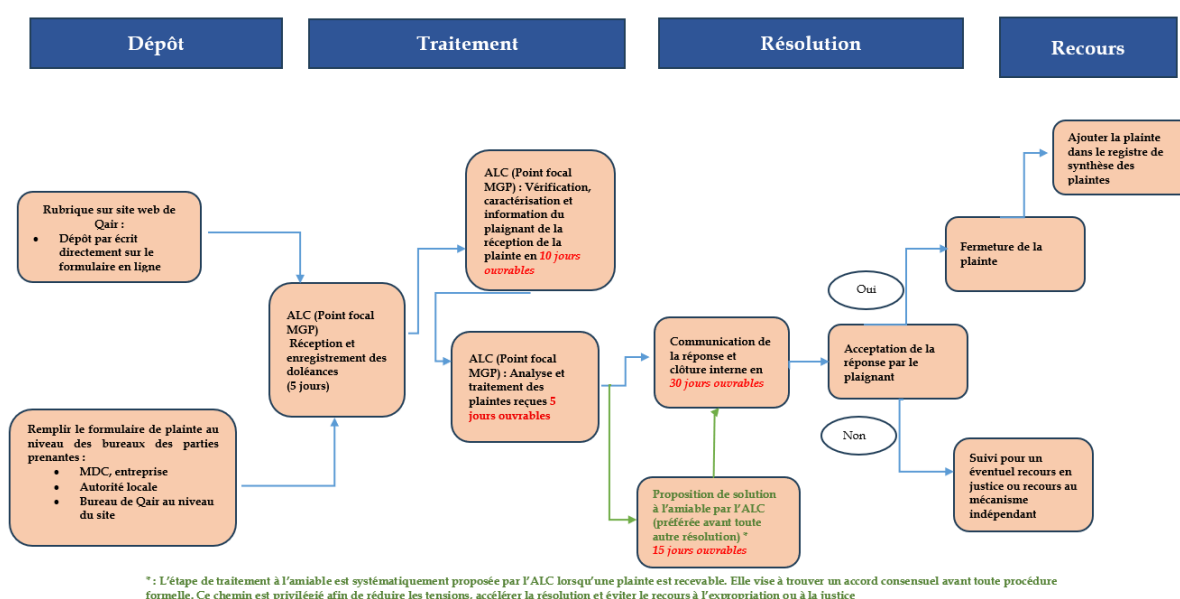


Figure1 Complaint management mechanism process

6.5 Complaint monitoring, evaluation, and reporting

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

- Rigorous monitoring of processing times, traceability of actions taken, and closure of complaints;
- The retention of supporting documents (complaint forms, mediation reports, closure forms, etc.);
- The automatic production of statistics and performance indicators for management, trend analysis, and continuous improvement purposes.
- The main monitoring indicators include:

- The number of complaints received by delegation, channel, or type;
- The resolution rate within the set deadlines;
- The average time taken to process complaints;
- The satisfaction rate expressed by complainants;
- Identification of recurring or unresolved complaints.
- Periodic evaluation:
 - A semi-annual evaluation of the mechanism will be carried out by the E&S team;
 - Qualitative reviews will be conducted to identify areas for improvement in the system (accessibility, efficiency, clarity of procedures);
- - Environmental and social monitoring reports sent to donors and authorities;
 - Meetings with stakeholders, particularly at the level of the delegations concerned (Bir El Hafey and Mazzouna);
 - Internal project performance reviews and periodic reports to Qair.

6.6 Commitment of the developer

Qair, as the developer of the Khobna-Sidi Bouzid solar power plant project, reaffirms its firm commitment to implementing a rigorous, ethical Complaints Management Mechanism (CMM) that complies with international standards.

Specifically, Qair commits to:

- Deploy an operational CCM that is accessible to all stakeholders, including vulnerable and low-literacy individuals;
- Train project staff, in particular the Community Liaison Officer (CLO), on procedures for receiving, recording, processing, and following up on complaints;
- Raise awareness among local communities about the existence of the mechanism, its objectives, access channels, and how it works, using appropriate media (posters, meetings, radio spots, etc.);
- Handle each complaint seriously, impartially, and confidentially, within the announced timeframes;
- Document the entire process in a transparent and secure manner, without compromising the privacy or identity of the complainant;
- Regularly review and improve the MGP based on feedback from the field and semi-annual evaluations;
- Mobilize the human, technical, and financial resources necessary to ensure its proper functioning, including during the construction phase.

The MGP is therefore a strategic tool for risk management, strengthening ties with local communities, and consolidating the social acceptability of the project in the Sidi Bouzid region.

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

In the context of the Gafsa photovoltaic power plant project, Qair recognizes that certain risks of gender-based violence (GBV), including sexual harassment, exploitation, or abuse (SEA/HS), may arise during the various phases of the project, particularly during construction. community, particularly women and girls, but also female construction workers and local service providers.

In accordance with the requirements of the donors (EBRD, IFC, EIB), a GBV Complaint Management Mechanism has been set up, integrated into the project's general GMM, but with specific provisions ensuring confidentiality, sensitivity, and rapid referral to specialized services.

1. Specific objectives of the GBV CMM

- Enable victims or witnesses to report cases of GBV confidentially, safely, and without stigma;
- Clearly separate the handling of GBV complaints from other types of complaints by providing a dedicated channel;
- Ensure a rapid and appropriate response that respects the privacy and protection needs of those affected;
- Refer survivors to specialized service providers (health, psychosocial support, legal assistance) in coordination with local structures.

2. Key principles

- Informed consent and absolute confidentiality;
- No reprisals against victims or complainants;
- Neutrality and active listening by reporting channels;
- Referral to specialized service providers identified locally (NGOs, hospitals, counseling centers);
- Specific training for project staff, particularly ACL, in receiving this type of complaint.

3. Reception and processing procedures

GBV complaints can be received via:

- The Community Liaison Officer (CLO), trained in confidentiality and sensitive handling of complaints;
- Identified trusted community relays (local women leaders, social NGOs);
- Secure complaint boxes specifically marked "Confidential - GBV";
- A dedicated telephone number or confidential SMS channel (TBD);

- In coordination with health or social services in the governorate of Sidi Bouzid.

4. Processing and referral

- No local investigations will be conducted directly by project staff. The role of the project team is limited to:
 - Acknowledging receipt discreetly;
 - Informing the survivor of their options;
 - Facilitating access to specialized service providers;
 - Documenting the report without identifiable personal data.
- List of service providers in Sidi Bouzid: to be finalized with the Regional Social Affairs Delegation, hospitals, local listening centers, and partner NGOs.

5. Follow-up and documentation

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

6. Commitment of the promoter

Qair is committed to:

- Raise awareness among project staff and subcontractors about GBV prevention;
- Incorporate contractual clauses of zero tolerance for harassment or abuse;
- Train the ACL and teams on the principles of confidentiality, listening, and referral;
- Establish safe and accessible channels for survivors;
- Actively collaborating with local service providers to support victims.

6.8. Independent Accountability Mechanism for EBRD Projects

All EBRD-financed projects must be structured to meet the requirements of the [EBRD's Environmental and Social Policy](#) (2024), which includes ten Environmental and Social Requirements (ESRs) in key areas of environmental and social sustainability that projects must meet, including ESR 10 on stakeholder engagement. In addition, [the](#) EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent tool of last resort, aims to facilitate the resolution of social, environmental, and public disclosure issues raised by project-affected persons and civil society organizations regarding EBRD-financed projects among project stakeholders, or to determine whether the Bank has complied with its Environmental and Social Policy and the project-specific provisions of its [Access to Information Policy](#); and, where appropriate, to remedy any breaches of these policies, while preventing any future

breaches by the Bank.

7 Monitoring, reporting, and updating

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

7.1 Engagement performance indicators

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

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

These indicators will be monitored continuously by the project's Environment and Social team.

Table8 Stakeholder engagement performance indicators

Indicator	Description	Monitoring frequency	Responsible
Total number of consultation meetings	Meetings held with stakeholders (community, institutional, targeted)	Quarterly	E&S Qair focal point
Participation rate of vulnerable groups	Proportion of women, young people, livestock farmers, people with disabilities, etc. in consultations	Quarterly	E&S Qair focal point
Number of information materials distributed	Posters, radio spots, public notices, web publications	Quarterly	E&S Qair focal point
Participant satisfaction rate	Assessed via mini-questionnaires or verbal feedback at the end of the meeting	Semi-annual	E&S Qair focal point
feedback comments received	e-mail		E&S Qair focal point
Feedback processing rate	Proportion of comments that received a response or action	Quarterly	Qair E&S focal point

Average response time	Average time (in days) between receipt and response to comment	Quarterly	E&S Qair focal point
Number of sensitive complaints (e.g., GBV/SEAH) identified and addressed	Complaints related to gender or situations of risk, handled confidentially	Quarterly	E&S Qair focal point
Number of PEPP updates made	Document updated in line with project developments or local context	At each major development	Qair E&S focal point

7.2 Periodic reports

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

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

7.3 Updating the PEPP

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

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

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

8

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

8.1 PEPP governance structure

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

8.2 Distribution of responsibilities

Actor	Key responsibilities within the PEPP
Qair Tunisia (promoter)/E&S expert Qair	<ul style="list-style-type: none"> - Overall management of PEPP implementation - Mobilization of necessary resources - Coordination with national and international stakeholders - Facilitation of the complaint management mechanism - Overseeing communication and transparency
E&S Expert Qair /Environmental/social consultant)/ Communications expert	<ul style="list-style-type: none"> - Technical support for the implementation of the PEPP - Organization and facilitation of community consultations - Production of appropriate communication materials - Monitoring of PEPP performance indicators - Regular reporting to donors and the promoter
Local authorities (governorate, delegation, municipality)	<ul style="list-style-type: none"> - Logistical support for field activities - Participation in institutional meetings - Facilitation of exchanges with local communities - Transmission of feedback or comments received locally - Support for the dissemination of information in the areas concerned

9

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

Appendices

Appendix 1: Minutes of meetings and photos taken during meetings and visits:

Minutes of the meeting in the Governorate of Sidi Bouzid

Date and time of the 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
Mr. Secretary General of the SBZ Governorate	Public	Ibrahim Jallouli	Environment
Mohamed ben Jaballah	Regueb and Mazzouna Delegate	Omar Bey	Head of Institutional Relations QAIR
Abdelhamid Khalfallah	Director of Energy Transition, Ministry of Energy	Marrouch Barhoumi	ANME Sidi Bouzid
Mounir Hamdi	State Property	Abdelhakim Samhoun	Local Council Mazzouna
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		
(Agenda)			
Public consultation meeting with stakeholders <ul style="list-style-type: none">- Summary presentation of the project- Discussion on each stakeholder's commitments to accelerate project implementation			
(Points discussed)			
<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: He emphasized the importance of cooperation between all institutional stakeholders and the consulting firm in order to successfully complete this stage of the projec .</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>			

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.

Representatives of the regional and local population also expressed their willingness to cooperate with the project without conditions.

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.

The debate also raised issues of development in the sustainable energy sector and its impact on the development of the region and the country.

The governor concluded the public consultation by urging all regional and local officials and elected representatives to cooperate with the project, each within their respective areas of responsibility, to ensure its success.

He also reminded the consulting firm to hold another session to present the study data.

(Actions to be taken)

- Complete the field mission
- Submit requests for information to the organizations present at the meeting, if necessary
- Be available to all project managers to clarify any issues
- Complete the study on time to avoid delays

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

الاسم واللقب	الصفة	رقم الهاتف/الفاكس	البريد الإلكتروني	الإيماءة
Omar Bel / Gai.	chargé des relations avec les associations Consultant E&S	99895898	o.bel@gai-maggy	
Oustavi N.zeu / A&F	Consultant E&S	98349234	miza.oustaue@pfrf	
Prof. Ncheli Benchedani	Consultant E&S	54995166	metodi.benchelien@actcontrolling.org	
Mariem Saubi	Consultant E&S	55938810	Mariem Saubi @ es&scosulting.org	
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Amami Leila	T.P. Arr. so CRDA	99893871	leila.amami@pfrf	
Brahim Jalloul	Environnement	5311160	brahim.jalloul@pfrf	
دور رابحي	مدير مشاريع	91760560	rabhi.dor@pfrf	
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		98800873		

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
أ. نبيل الغزال	رئيس دائرة مروت مندوبية الفلاحة بسبب	52 80 33 44	amis.elyegza@gmail.com	
حبيب اسرار	البيوت	53 21 16	hrahman@adnab.com	
رحاء عاني	رئيس مصلحة الفلاحة بسبب	99 86 026	amir.official@gmail.com	
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بها صافي	البلاد بسبب	29 17 60 50	holia.big@outlook.com	
نور دليسي	مستشار للحرف	58 67 96 08		
محمد دلا	رئيس المجلس المحلي البلدية	29 53 10 09	Mohamed ben ali. Omail - Com	
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عليه العماري	نائب المجلس المحلي البلدية	50 53 75 22		
نور الدين الفخار	مستشار البلدية	99 24 93 58		
مكي المصطفى	نائب المجلس المحلي البلدية	29 05 57 50		
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عبد الحكيم سمحون	عضو مجلس محلي بالمرحلة	54 71 98 33	hakim.samhoun@outlook.com	
أيمن الطاهري	عضو مجلس محلي البلدية	27 42 56 64	aymen.tahri2006@outlook.com	

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 و اللقب	الصفة	رقم الهاتف/الفاكس	البريد الالكتروني	الإمضاء
تيسري عوي - منير حادي صلاح الدين عيسى المقدم القادسي طه محمد بن حسان المبورع عبد الحميد خلف الله ليلي موز ربي	CADA أملك الدولة أوليم الخناسي محندة الطاهر علي بارقا خير إجماع حميد أنفال (ط) ها بي - متايد املك - الدولة	91596402 76632627 22671823. 2980201 20.738.958 40932752	clawer.suzi@384mail.com abdellhamid.khalafallah@gmail.com ch.ppr.stp@gmail.com	      

Attendance list

Minutes of the CRDA meeting – Forêts district

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

Article 222

Minutes of the CRDA meeting – Sol district

Date and time of the meeting: May 9, 2025, at 1:00 p.m.		Location: CRDA Sidi Bouzid – Sol District	
List of participants			
Participant	Organization	Participant	Organization
Leila Amami	District Chief	Aroua Mestiri	Social Specialist, ASF Consulting
Nizar Ouertani	Environmental Expert, ASF Consulting	Mehdi Benchelbi	Renewable Energy Engineer, ASF Consulting
Mariem Soula	E&S Specialist, ASF Consulting		
Agenda			
<ul style="list-style-type: none">• Presentation of the power plant and high-voltage line project• Assessment of the suitability of the land concerned• Collection of maps and reference documents• Identification of associated environmental risks			
Points discussed			
<ul style="list-style-type: none">• The project was presented in detail, including the land requirements for the power plant and high-voltage line.• It was reiterated that the land crossed is used for agriculture, which must be respected in the implementation of the project.• It is necessary to avoid any degradation of arable land or land with productive potential.• The risks of erosion and flooding were discussed; a review of the route in relation to these constraints is recommended.• Several maps were consulted and photographed:<ul style="list-style-type: none">• Land use map• Soil suitability map• Pedological map• Soil physicochemical composition map• The borough chief has agreed to share digital versions of these maps.			
Actions to be taken			
<ul style="list-style-type: none">• Incorporate soil data into the environmental impact analysis.• Use only official reference maps in the study.• Request digital versions of the photographed maps.• Identify priority agricultural areas in the final route.			



Analysis of soil characteristics in the governorate of Sidi Bouzid

Minutes of the CRDA meeting – Water Resources District

Date and time of the meeting: May 9, 2025, at 10 a.m.		Location: Water Resources Department – Sidi Bouzid	
List of participants			
Participant	Organization	Participant	Organization
Haythem Jabnoui	Head of Water Resources District	Aroua Mestiri	Social Specialist, ASF Consulting
Nizar Ouertani	Environmental Expert, ASF Consulting	Mehdi Ben Chelbi	Renewable Energy Engineer, ASF Consulting
Mariem Soula	E&S Specialist, ASF Consulting		
Agenda			
<ul style="list-style-type: none">• General presentation of the photovoltaic power plant project in Sidi Bouzid (Khobna).• Presentation of the site location and its main technical characteristics.• Presentation by ASF Consulting, the engineering firm in charge of the environmental and social assessment, to outline the ESIA approach and explain the consultation process.• Consultation and collection of opinions, comments, and expectations from the water resource district.			
Points discussed			
<ul style="list-style-type: none">• The district chief reported that the well networks have not yet been fully mapped; the data remains incomplete.• He presented a topographic background map including ravines and other hydromorphological features.• Confirmed need to conduct a flood study to assess the risks associated with the line passing through potentially sensitive areas for verification, even if the site is not considered a flood zone.• The chief confirmed that the project site is not located in a water resource protection zone.• A map of the surface water table was presented to the team.• The chief provided data on water quality (salinity):<ul style="list-style-type: none">◦ Bouhedma: 5.1 g/l◦ Douara: 2.7 g/l• Information on the variation in the water table level in Douara, which is falling by an average of 1.7 m per year.• The official limit of the Sebkha is set at 3 m.• It has been confirmed that there are no constraints related to the Sebkhas in the area concerned by the project.• All data concerning hydrological maps is currently being processed.			
Actions to be taken			
<ul style="list-style-type: none">• Provide for a temporary acquisition procedure for pylons located in the hydraulic protection zone (DPH).• Acquire the hydrological maps when they become available.			

Minutes of the CRDA meeting – Water and Soil Conservation District (CES)

Date and time of meeting: May 9, 2025, at 2 p.m.		Location: CRDA Sidi Bouzid – CES district	
List of participants			
Participant	Organization	Participant	Organization
Anis el Ghezal	Head of Water and Soil Conservation District	Aroua Mestiri	Social Specialist, ASF Consulting
Nizar Ouertani	Environmental Expert, ASF Consulting	Mehdi Benchelbi	Renewable Energy Engineer, ASF Consulting
Mariem Soula	E&S Specialist, ASF Consulting		
Agenda			
<ul style="list-style-type: none">• Technical and geographical presentation of the El Khobna photovoltaic power plant project• Assessment of potential interactions between the high-voltage line route and existing CES structures• Collection of observations related to erosion risks and conservation structures			
Points discussed			
<ul style="list-style-type: none">• The photovoltaic power plant project was presented in detail, including the preliminary route of the transmission line.• It was emphasized that no pylons should be erected directly on a CES structure, in particular weirs or dams.• In the event of interference with a bench, a rehabilitation or localized sectioning solution may be considered, under the responsibility of the project owner.• Benches must be preserved, as they play an essential role in combating soil erosion.• No active CES structures were identified at the power plant site according to field observations.• The terrain is slightly sloped, and no signs of runoff were observed during the visit.			
Actions to be taken			
<ul style="list-style-type: none">• Check the final position of the pylons in relation to the CES structures during the cartographic analysis.• If a pylon is located on a bench, include a rehabilitation measure in the PGES.• Maintain open dialogue with the CES district to validate technical data.			

Meeting minutes – Meknassi Forestry Department

Date of meeting: May 9, 2025		Location: Bouhedma National Park	
Meeting time: 4:00 p.m.			
List of participants			
Participant		Organization	
Abdellatif BEN ALI		Forest Director	
Nizar OUERTANI		ASF Consulting	
Aroua MESTIRI		ASF Consulting	
(Agenda)			
<ul style="list-style-type: none">• Tour of the park's facilities and wildlife• Visit to the Ecomuseum• Presentation by the Director of Forest Conservation• Discussion on park management and forest regulations• Exchanges and questions			
(Points discussed)			
<ul style="list-style-type: none">• Tour of the park and facilities<ul style="list-style-type: none">○ Visit wildlife conservation areas, including protected species such as addax and oryx.○ Discover the Ecomuseum, which showcases the different plant and animal species found in the park.○ Presentation by the Director of Forest Conservation of the park's topographical maps.• Park management and regulatory framework<ul style="list-style-type: none">○ The park is fenced, and the surrounding mountains are privately owned by the state and subject to forestry regulations due to the presence of the Halfa plant (نبات الحلفة).○ This domain is under the supervision of the General Directorate of Forests (DGF).○ The Director of Forests has specified that in the event of difficulties or blockages, the Halfa district of Kasserine should be contacted.• Power line route<ul style="list-style-type: none">○ An old power line still crosses part of the park.○ The new line will run parallel to the old one, but will not cross the park. It will run along the periphery, practically delimiting the protected area.○ The main purpose of the meeting was to examine the exact route of the new power line and to assess the number of people affected by the compensation.○ STEG will not purchase the land, but will provide compensation for temporary occupation or work carried out on private land.• Installation on private state-owned forest land<ul style="list-style-type: none">○ To avoid installing pylons on agricultural or inhabited land, it was proposed to install them on private state-owned land subject to forestry regulations.○ This type of intervention requires authorization from the Minister, in accordance with Article 222 of the Forest Code.			
(Actions to be taken)			
<ul style="list-style-type: none">• Propose the new route for the power line to QAIR			

FEUILLE DE PRESENCE

Objet de la réunion : Tracé de la ligne - Parc Bouhedma

Date : 09-05-2025

Lieu : Parc Bouhedma

Nom et prénom	Poste / Organisation	Numéro de téléphone	Adresse électronique
Nizar Ouertani	Expert environnemental	98349234	nizar.ouertani@astconsulting.org
Arwa Mestiri	Spécialiste sociale	29 69 22 23	arwa.mestiri@astconsulting.org
Abdellatif Ben Ali	Dir. forêt	97 388 284	—

Minutes of the meeting with INP

Date and time of meeting: July 9, 2025, at 10 a.m.	Location: Bir El Hafey – Sidi Bouzid
List of participants	
Participant	Organization
Mohamed Kamel Brahmi	Heritage Curator
Anouar Kadri	Heritage Curator
Aroua Mestiri	Social Specialist – ASF Consulting
Mohamed Mehdi Benchelbi	E&S Specialist – ASF Consulting
(Agenda)	
<ul style="list-style-type: none"> • Presentation of the QAIR project and the consulting firm's mission • Discussion with INP Bir El Hafey concerning the archaeological heritage in Khobna • Location and documentation of the discovered site • Discussion on the potential impact of the project (location of pylons) • Planning of a site visit 	
(Points discussed)	
<ul style="list-style-type: none"> • A general presentation of the QAIR project, including the component carried out by SCATEC, was given. • It was reiterated that the consulting firm has been commissioned to carry out the environmental and social impact assessments (ESIA) for the QAIR project, including the identification of heritage constraints. • During the meeting, the curator of the National Heritage Institute (INP) – Bir El Hafey branch, reported the discovery of an archaeological site consisting of Roman basins in the study area, prior to the launch of the SCATEC project. • The GPS coordinates of the site and photos were shared with the team. • It was agreed to organize a joint field visit the following day to assess the condition of the site and discuss the location of the project's pylons, with a view to preventing any impact on the heritage. 	
(Actions to be taken)	
Conduct the joint field visit with the INP to view the archaeological site and discuss the challenges of setting up the project.	

FEUILLE DE PRESENCE

Objet de la réunion : _____

Date: _____

Lieu : _____

Nom et prénom	Poste / Organisation	Numéro de téléphone	Adresse électronique
Brahmi Mohamed Braoud	conservateur	94 414 082	brahmimohamedbraoud@gmail.com
Kadri Amour	conservateur	42 436 435	Kadriamour03@gmail.com
M ^{me} Melodi Bencheikh	Spécialiste E&S	54 995 166	melodi.bencheikh@afconsulting.org
Aroua Meshri	Spécialiste sociale	24 692 223	arouameshri@afconsulting.org

Attendance list at INP - Bir El Hafey



Photos taken during the meeting

Appendix 2: Complaint form

Date:

Prepared by:

.....

Complaint number:

.....

Complainant:

.....

Home address:

Phone number:

Reason for complaint (detailed description):

.....

Location concerned by the complaint:

.....

Classification of complaint (check the applicable box)

☐ Complaint

Omissions in the inventory

☐ I am not satisfied with the assessment that was made☐ I have not been compensated as expected☐ Inventory error☐ The work caused damage to my crops☐ Observation☐ Suggestion/request

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

☐ Yes ☐ No

Has the complaint already been referred to the courts?

☐ Yes ☐ No

Follow-up on the complaint (note the steps taken to resolve it)

.....

.....

Signature of the complainant:

Date of signature:

Signature of XXXX who received the complaint:

Date of signature:

3: Complaint closure form

Complaint No.:

Date complaint filed:

Prepared by:

Complainant:

Home address:

Phone number:

Reason for complaint (detailed description):

Location concerned by the complaint:
.....

Response provided:

This response:
.....

- ☐ I am fully satisfied. In this case, the complaint is closed on DATE in PLACE
- ☐ I am not satisfied with the situation. Therefore, I wish to take legal action or refer the matter to the relevant authorities.

Signature of XXXX:

Date of signature:

Signature of the complainant:

Date of signature:

Appendix 4: GBV Complaint Registration Form**1. General Information**

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

Date received: [DD/MM/YYYY]

Channel of receipt:

☐ Telephone☐ Email☐ Drop box☐ Community meeting☐ Other: _____**2. Information about the Complainant (Optional for anonymity)**

First and last name: [If the complainant chooses to identify themselves]

Gender: ☐ Male ☐ Female ☐ Other: _____

Contact (Phone/Email): [Optional]

Age (approx.): _____ years old

Status:

☐ Directly affected party☐ Witness☐ Community representative☐ Other: _____**3. Nature of the Complaint**

Type of GBV incident (check all that apply):

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

Location of incident: _____

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

4. Description of the complaint

Summary of the facts:

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

Identity of the person allegedly responsible (if known and desired by the complainant):

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

5. Level of Confidentiality (to be confirmed with the complainant)☐ Fully confidential (no disclosure of identifiable information).☐ Partially confidential (some information may be shared for investigation purposes).☐ Non-confidential (all information may be shared).**6. Immediate Action**

Action taken upon receipt of the complaint:

☐ Recorded in the system.☐ Forwarded to the complaint management mechanism.

☐ Referral to a support service (psychological/legal).

☐ Other: _____

7. Follow-up and Resolution

Responsible for follow-up: [Name/Position]

Planned measures for resolution:

[Include proposed steps, e.g., investigation, mediation, assistance to the complainant, etc.]

Current status of the complaint:

☐ Under review

☐ Resolved

☐ Transferred to an independent mechanism

☐ Other: _____

Date of closure of complaint: [DD/MM/YYYY]

register

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