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de l'Électricité et du Gaz



الشركة التونسية
لل كهرباء والغاز



European Bank
for Reconstruction and Development


STAKEHOLDERS ENGAGEMENT PLAN (SEP)

50 MW Solar and 10 MW/20MWh Battery Energy Storage Solution (BESS)
with associated Transmission Line Project in Beni Mhira, Governorate of
Tataouine – Tunisia



Environmental Assessment & Management

March 2026

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	50 MW SOLAR AND 10 MW/20MWH BESS WITH ASSOCIATED TL	VERSION:01
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REPORT: STAKEHOLDER ENGAGEMENT PLAN (SEP)
50 MW SOLAR AND 10 MW/20MWH BATTERY ENERGY STORAGE SOLUTION
(BESS) WITH ASSOCIATED TRANSMISSION LINE PROJECT IN BENI MHIRA,
GOVERNORATE OF TATAOUINE – TUNISIA

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REPORT REVIEW		
DATE	VERSION	REFERENCE
06 February 2026	00	Preliminary Version
1 March 2026	01	Final Version

This report has been prepared by Environmental Assessment and Management (EAM) with all reasonable care and diligence in accordance with the terms of our contract with the client, including our General Terms and Conditions of Business, and taking into account the resources allocated in agreement with the client.

We accept no liability to the client or any other party in respect of any matter outside the scope described above.

This report is confidential to the client and we accept no liability of any kind to third parties who may become aware of this report, in whole or in part.

This report has been prepared in accordance with EAM's Integrated Management System.





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ACRONYME S & ABREVIATIONS

ANPE	National Environmental Protection Agency (ANPE)
BESS	Battery Energy Storage Solution
CLO	Community Liaison Officer
CRDA	Regional Commissariat for Agricultural Development
DGEER	General Directorate of Energy and Renewable Energies
E&S	Environmental & Social
EAM	Environmental Assessment & Management
EBRD	European Bank for Reconstruction and Development
EPC	Engineering, Procurement, and Construction
ESAR	Environmental and Social Assessment Report
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
GBVH	Gender-Based Violence and Harassment
GN	Guidance Note
GRM	Grievance Redress Mechanism
HV	High Voltage
INP	National Heritage Institute
kV	Kilovolt
KWh	kilowatt-hour
ME	Ministry of Environment
MEHA	Ministry of Equipment and Housing
MIME	Ministry of Industry Energy and Mining
MW	Megawatt
MWp	Megawatt Peak
NTS	Non-Technical Summary
OEP	Office of Livestock and Pastures
OHTL	Overhead Transmission Line
ONAS	National Sanitation Office
PV	Photovoltaic
RoW	Right of Way
RL	Local Route
SEP	Stakeholder Engagement Plan


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SONEDE	National Water Supply and Distribution Company
STEG	Tunisian Electricity and Gas Company
KPIs	Key Performance Indicators

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GLOSSARY OF TERMS

Complaint and redress mechanism	<p>Represents the system adopted by the proponent that allows all stakeholders, particularly affected individuals and communities, to provide feedback, express their concerns, and thereby access information and, where appropriate, seek redress and remedy.</p> <p>The mechanism must be effective, as it must be legitimate, accessible, predictable, fair, transparent, consistent with human rights, based on engagement and dialogue, and a source of learning for all stakeholders, including the proponent. The scope of such a mechanism is the entire operation, but it is not intended to serve employer-staff relations, with a separate grievance structure dedicated exclusively to that purpose.</p>
Public consultation	<p>Where communities are, or are likely to be, affected by the adverse effects of a project, the proponent will undertake a meaningful consultation process to provide affected parties with an opportunity to identify and express their views on the risks, impacts and mitigation measures of the project, and to engage in a process of collaboration with the project to address and respond to the considerations raised.</p>
Stakeholders	<p>Any entity (person, group, organization, institution) concerned and potentially affected by a project or able to influence a project.</p>
Vulnerable Groups	<p>People who, because of their gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, are more likely to be affected by resettlement than others and may not be fully able to access or benefit from resettlement assistance and related development benefits.</p>

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1 INTRODUCTION

1.1 BACKGROUND


As part of its energy transition strategy, Tunisia has set itself the target of achieving a share of renewable energies in the electricity mix of 35% by 2030 and 50% by 2035. This will result in the installation of a total functional renewable capacity of 4,850 MW by 2030 and 8,350 MW by 2035 using photovoltaic and wind.

As part of its efforts to promote renewable energy in Tunisia, the Tunisian Electricity and Gas Company (STEG), (hereafter referred to as "the Developer"), plans to build a 50 Mega Watt (MW) Photovoltaic (PV) solar power plant and 10MW/20MW battery Energy Storage Solution (BESS) in Beni Mhira within the governorate of Tataouine with associated OHTL 1.2 km grid infrastructure hereafter referred to as "the Project".

This document is the Stakeholder Engagement Plan (SEP). The SEP describes the policy and regulatory framework associated with stakeholder consultation and information disclosure, reflecting the combined requirements of Tunisian national legislation and the EBRD Environmental and Social Policy (2024), including Environmental and Social Requirement ESR 10: Stakeholder Engagement, and the accompanying Guidance Note (GN).

The SEP includes a brief description of the project and the areas potentially affected, the results of a stakeholder identification process, details on how vulnerable people should be involved through a series of measures, a summary of consultation and disclosure activities, a complaint management mechanism, monitoring and evaluation indicators to be used to track progress during the implementation of the SEP, and the parties responsible for implementing the SEP.

This SEP will be reviewed and revised throughout the duration of the EBRD loan (at least annually) to reflect the status of the project at that time and any changes to the project design.

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2 CHARACTERISTIC OF THE PROJECT

2.1 PROJECT DESCRIPTION

2.1.1 Project location and socio-economic context

Tunisia is divided into 24 governorates, which are further subdivided into 279 delegations, and these delegations are themselves subdivided into sectors (imadats). The PV plant site is located in the Ksar Mehira sector of the Beni Mhira delegation, which is part of the Tataouine governorate. The nearest community to the Project site is Beni Mhira, located approximately 15 km to the northwest, with an estimated population of around 8,190 residents distributed across 2,134 dwellings (RGPH,2024).

The PV site is located in a rural area around 1 km from the local road RR1011 on the southwest and around 3 km from unclassified road on the northeast.

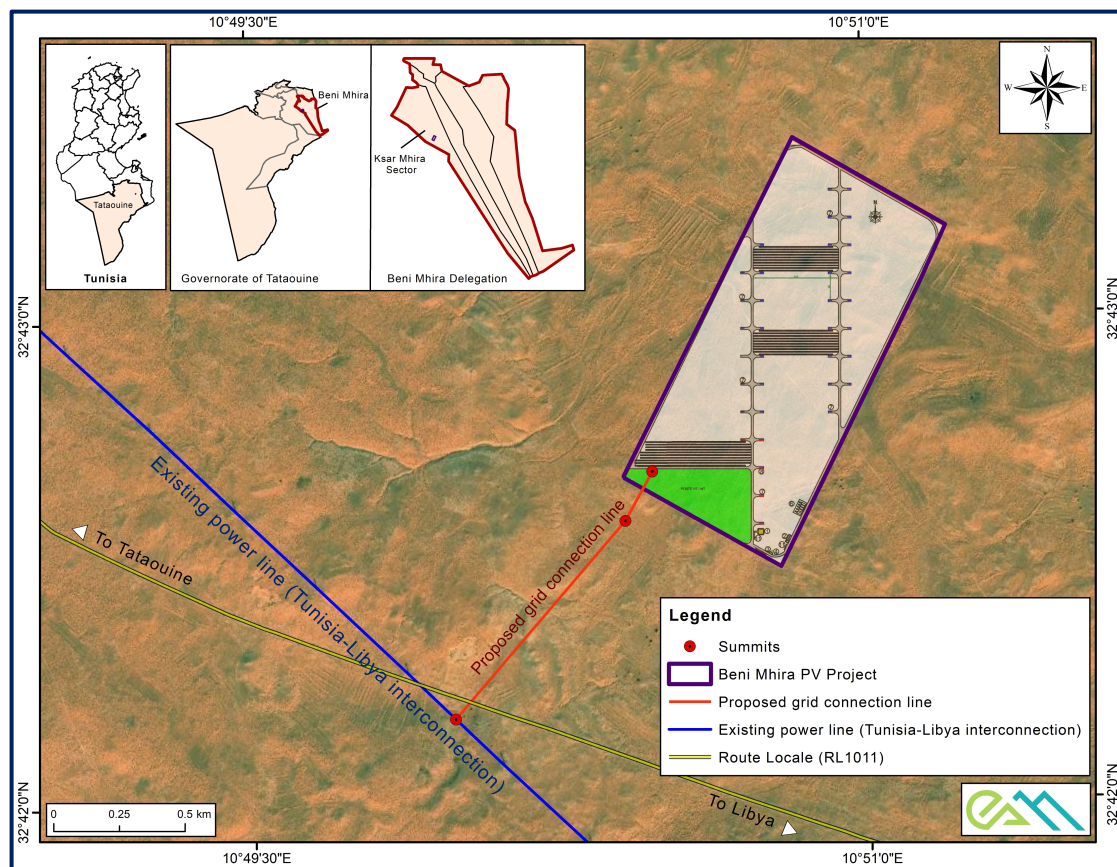



Figure 2-1: Project location map

The Developer (STEG) will construct the solar arrays, the BESS and the HV/MV station on land ceded by the community land management of Zorgane” مجلس تصرف الزرقان” to STEG, covering an area of 100 ha. A purchase agreement was signed between the community land management of Zorgane and STEG and registered on December 19, 2017.

There is recent evidence of land use for grazing activities. Grazing or movement generally occur in scattered herds managed by herders from the local community of Beni Mhira.

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According to the delegate, camel herding in the area is carried out by four (04) herders, managing approximately 210 camels. The land is already fully degraded, and its current use is limited to extensive grazing. It should be noted that the environmental conditions within the project site are similar to those of the surrounding areas outside the site, with no distinctive land use or ecological value.

Outside the PV site, three abandoned contemporary reservoirs and a recently built Majel-type reservoir have been identified to the west of the PV plant site.

The OHTL of the project will have 3 summits (these designate a change in the direction of the OHTL) and mainly crosses land belonging to the community land management of Zorgane (1.1 km – 91%), the remainder crosses lands belonging to the community land management of Mhamedia “محمديّة” .

2.2 VICINITY OF THE PROJECT

The immediate vicinity of the solar PV plant is surrounded on all four sides (north, east, west and south) by bare lands with no agriculture plantations and used for formal grazing activities.

The vicinity of the solar PV plant is provided below:

- North-West: Beni Mhira village is located approximately 15 km from the site.
- North-Est: Industrial salt production facility “Sebkhet Oum El Khialate” located about 10 km from the site which is a natural salt area exploited for the production of sodium sulfate,
- South-west of the solar PV site (approximately 1 km): Existing 225 kV transmission line and local road RL1011.

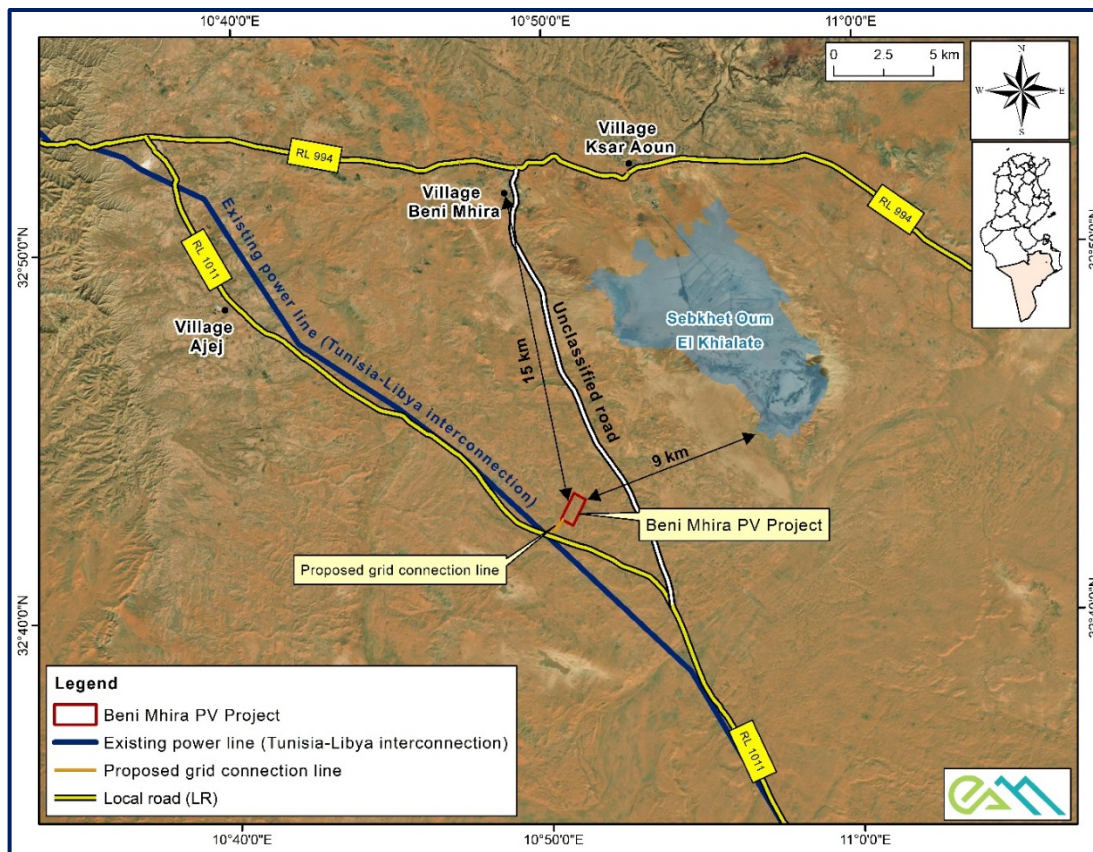



Figure 2-2: Vicinity of the PV Solar Plant

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3 LEGAL FRAMEWORK AND EBRD REQUIREMENTS

3.1 NATIONAL LEGISLATION

There is no clear and defined mechanism/framework for stakeholder involvement in Tunisia for activities related to construction or operation of a project. Since the Tunisia revolution in 2011, the National Environmental Protection Agency (ANPE) as EIA regulator, has requested a stakeholder consultation report to be appended to the Environmental Impact Assessment (EIA), although this request is not defined as a requirement in law.

A preliminary environmental and social impact study was carried out in July 2019. However, on the basis of Decree no. 2005-1991 of 11 July 2005 on environmental impact assessment (EIA), which defines the categories of units subject to environmental impact assessment and the categories of units subject to specifications, only electricity generation units with a capacity of at least 300 MW are subject to EIA. Consequently, the project to build the Beni Mhira solar PV plant with a capacity of less than 300 MW **does not require an EIA**.

Analysis of the vulnerable population or an examination of gender aspects is not required by the decree or related laws. There is no obligation to publish EIA reports, nor any deadline for public consultation, unless required by donors.


In accordance with the Order of the Minister of Industry, Energy, and Small and Medium-Sized Enterprises of November 15, 2005, establishing the nomenclature of dangerous, unhealthy, or inconvenient establishments as completed and amended by the Order of the Minister of Industry and Technology of February 23, 2010, and the Order of the Minister of Industry of October 24, 2012, the presence of battery energy storage solution, classifies the Project site as a third-category installation under Section 1601 (Accumulators), as the maximum direct current power exceeds 2.5.

Accordingly, **a safety study is required**. This study will be part of the application file for the classified facility permit and will primarily aim to assess the Project's compliance with applicable regulatory requirements and Civil Protection requirements.

3.2 EBRD REQUIREMENTS

EBRD's Environmental and Social Policy (2024) requires a meaningful and inclusive stakeholder engagement process. EBRD has 10 ESR that potentially apply to projects funded by the Bank.

Stakeholder engagement is discussed in ESR1 and more specifically in ESR10. ESR10 focuses on Information Disclosure and Stakeholder Engagement, which is described as an ongoing process involving: (i) the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders; (ii) meaningful consultation with potentially


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affected parties; and (iii) a procedure or policy by which people can make comments or complaints. This process should begin at the earliest stage of project planning and continue throughout the life of the project.

Where stakeholder groups are identified as disadvantaged or vulnerable, dedicated approaches and an increased level of resources is needed so that they fully understand potential risks and impacts that may affect them. Periodic reports should be issued by the client to identified stakeholders, commensurate to the nature of the Project and its associated environmental and social impacts, and the level of public interest (ESR 10, paragraph 28).

Based upon the above, stakeholder and information disclosure activities will be conducted during the following project stages:

- During the environmental and social assessment phase (the current phase of the project).
- Before construction begins and regularly during the construction period; and
- During the project's operational phase.

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4 IDENTIFICATION OF STAKEHOLDERS

Project stakeholders are defined as individuals, groups or communities who:

- Will be affected or are likely to be affected, positively or negatively, and directly or indirectly by the Project ("Project affected parties"), particularly those directly and adversely affected by project activities, including those who are disadvantaged or vulnerable; or
- May have an interest in the Project and/or the ability to influence its outcomes, either positively or negatively ("other influential/interested groups").

A stakeholder identification process was conducted by EAM through the following steps:

- identifying individuals, groups, local communities and other stakeholders that may be affected by the project, positively or negatively, and directly or indirectly, particularly those directly and adversely affected by project activities, including those who are disadvantaged or vulnerable.
- identifying broader stakeholders who may be able to influence the outcome of the project because of their knowledge about the Affected Communities or political influence over them given the administration context of the Project site.
- identifying legitimate stakeholder representatives, including officials, non-elected community leaders, leaders of informal or traditional community institutions, and elders within the Affected Community.
- mapping the impact zones by placing the Affected Communities within a geographic area including identifying the road sections to be used, to enable the geographical area of impacts to be explored.

The stakeholders identified were subsequently divided into the following groups and a profile prepared which is presented in Table below:

- Group A: Regional government and municipal authorities (including media).
- Group B: Civil society organisations.
- Group C: Affected Communities including landowners and land users.
- Group D: The Project construction workforce.


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Table 4-1: List of stakeholders and their profile

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
A – Regional government and municipal authorities (including media)			
A1	Governorate of Tataouine	<p>Regional political authority (non-elected position). Main leader at regional level and representative of the governorate at national level.</p> <p>The governor's main role is to support the project by providing the necessary authorizations and support on the various issues that may be encountered during the life of the project, such as land use, security, community conflicts and grievance management, project employment priorities within the communities, health issues, social development programs.</p>	<ul style="list-style-type: none"> - Economic displacement that impacts the community land management (Zorgane and Mhamdia), and land users. - Potential road safety risks and how these are to be managed. - Local employment opportunities arising from the Project. - The potential for the developer to design and implement future social development programs.
A2	Beni Mhira Delegation	<p>Delegate (non-elected position). Head of delegation and delegation representative at regional level. He oversees local administrative services.</p>	<ul style="list-style-type: none"> - Ensuring that vulnerable people are included in stakeholder consultation and information disclosure activities adequately and are also aware of the project.
A3	Smâr municipality	<p>Mayor: President of the municipal council, responsible for business, managing municipal interests and contributing to the social, economic and cultural of the municipality. He/she issues permits for all construction. He/she oversees solid waste & waste waters management during the construction and operation phases. And he/she coordinates the Developer and its contractors on solid waste disposal.</p>	<ul style="list-style-type: none"> - Waste management operations. - National permitting and licensing of the Project.
A4	Ksar Mhira: local administrative unit	<p>Local Chief: operates under the authority of the delegate. He/She is responsible for assisting various administrative bodies and ensuring the welfare of citizens. He / She coordinates the</p>	

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		developer and its contractors on public consultations, social aspects and Community Development Plan implementation.	
A5	STEG regional district	STEG's regional district will liaise with the STEG's national management for connection to the national grid.	<ul style="list-style-type: none"> - The intersection of the project with future projects in the region concerning the development of renewable energy projects, including associated facilities (HV transmission line). - Understand the local needs of the region to meet future electricity supply projections.
A6	Ministry of the Environment (ME)	The ME is represented at regional level by the ANPE, which is responsible for monitoring the implementation of the environmental management plan (EMP) by the Developer.	<ul style="list-style-type: none"> - Economic displacement that impacts the community land management and land users. - The need to protect the environment, even if an EIA is not required under national legislation. - The availability of relevant E&S data held by the ANPE.
A7	Regional Commission for Agricultural Development (CRDA)	Representative of the Ministry of Agriculture, Hydraulic Resources and Fisheries (MARHP) at regional level. The CRDA manages floods and watercourses in the project area. It is also responsible for authorizing the drilling of water wells.	<ul style="list-style-type: none"> - Economic displacement that impacts the community land management of Zorgane and Mhamdia and land users. - Potential groundwater abstraction impacts to other water users. - Providing information on use of state-owned land. - Providing livelihood restoration measures if any material impacts.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
A8	Housing Equipment Department and land use planning	Representative of the Ministry of Equipment and Housing (MEHA) at the regional level.	<ul style="list-style-type: none"> - The classification of land intersected by the project. - The potential for future land use changes to occur in the vicinity of the project, which must be taken into consideration at the project design stage (now), as otherwise this could lead to future land use conflicts. - Potential grievances from the community land management of Zorgane and Mhamdia, and land users. - Potential road safety risks and how these are to be managed.
A9	Regional Department of State Domains and Land Affairs of Tataouine	Under the supervision of the Ministry of State Domains and Land Affairs. It is responsible for the control, management and use of movable and immovable property belonging to the State, the design of State policy relating to public and private domains, and the acquisition and expropriation of real estate for the benefit of the State and public administrative establishments at their request, in collaboration with the relevant ministries.	<ul style="list-style-type: none"> - Classification of land ownership along the project. - The accuracy of the cadastral database and the possible need for additional surveys along the route to clarify land boundaries. - Potential grievances from the community land management and land users. - The legal process and time required to commence expropriation procedures where land is under private ownership. - The potential for future land use changes to occur in the vicinity of the project.
A10	National Company of Exploitation and Distribution of Water (SONEDE)	A Tunisian non-administrative public-sector company that supplies drinking water throughout Tunisia. It is placed under the	<ul style="list-style-type: none"> - Potential groundwater abstraction impacts to other water users.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		supervision of the Ministry of Agriculture, Hydraulic Resources and Fisheries.	
A11	National Sanitation Office (ONAS)	ONAS is a public establishment of an industrial and commercial status. It is placed under the supervision of the Ministry of Local Affairs and the Environment. ONAS is the main actor in the protection of the water environment and the fight against all sources of pollution.	- The management of wastewater generated by the Project.
A12	National Guard	The National Guard is the national gendarmerie (i.e. a police force with military status) of Tunisia. It is distinct from the armed forces in that it is part of the Ministry of the Interior. It serves both as a defence force against external threats and as a security force against internal threats. Within the territorial limits of its jurisdiction, the National Guard is responsible for: 1) maintaining public order; 2) preserving the safety of people and property; 3) protecting land and sea borders; 4) <u>road and freeway traffic</u> , safety and control; 5) public safety, recording offences and tracking down their perpetrators; 6) judicial investigations, assisting in the enforcement of judicial decisions and administrative regulations; 7) intelligence on all aspects of political, economic, social and cultural life; 8) tourism safety; 9) control of explosive and hazardous materials; 10) mobilization and incorporation, and gradual intervention in the first and second degree throughout the territory of the Republic ¹ .	- The management of regional security risks in the Beni Mhira delegation. - The potential need for security personnel to protect workers, materials and construction equipment. - The management of potential road safety risks, as it is this stakeholder who has the legal responsibility to intervene in the event of a road accident.

¹ <https://www.force-publique.net/wp-content/uploads/2023/05/2023-Tunisie-fr-1.pdf>


No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
A13	Department of Vocational Training and Employment	Representing the Ministry of Vocational Training and Employment (MFPE) at regional level. Provides skilled and unskilled manpower requirements.	<ul style="list-style-type: none"> - Local employment opportunities available. - Ensuring that there are no violations of worker rights defined by national legislation of the employed persons.
A14	National Heritage Institute (INP)	<p>The National Heritage Institute (INP) is a public administrative institution with legal personality and financial autonomy. It is a scientific and technical institution responsible for establishing the inventory of cultural heritage, archaeological, historical, civilizational and artistic, of his study, his Safeguard and its development.</p> <p>The National Heritage Institute (INP) is involved due to the presence of cluster of tumuli identified within the project site. As well as the nearby Ksour located to southeast of the site:</p> <ul style="list-style-type: none"> • Ksra Jdid (قصر جديد), approximately 7 km away. • Ksar Retbet el Krachoua (قصر رتبة الفرشوة), around 8 km from the project area. 	<ul style="list-style-type: none"> - Potential impacts to archaeological remains or protected heritage sites. - The National Heritage Institute (INP) can evaluate the project's potential impact on historical sites (if present). - If heritage elements are uncovered during construction, the INP has the authority to intervene, document them, and preserve them.
A15	Civil protection	<p>It is responsible, throughout the territory of the Republic, for all missions and interventions required for the rescue of people and the protection of property from various accidents, calamities and disasters, and for the safety of public and private establishments and companies, whatever their nature (Decree no. 2006-1164 of April 13, 2006, on the special status of civil protection corps agents).</p> <p>Prior to the construction phase, the EPC contractor is required to prepare a safety study is due to the presence of storage batteries.</p>	<ul style="list-style-type: none"> - Requires compliance with national building safety standards for fire, flooding, etc.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		The project is classified in category 3 under section 1601 (Accumulators) of the decree issued by the Minister of Industry Energy and Mining (MIME), as the maximum direct current power used for this operation exceeds 2.5 kW.	
A16	Assembly of People's Representatives for the governorate of Tataouine	It has been the lower house of the Tunisian Parliament since the promulgation of the Constitution on August 16, 2022. It shares legislative power with the National Council of Regions and Districts and oversees government action.	- Ensures that all infrastructure projects are aligned with local and national government priorities.
A17	Regional Council	Regional Councils in Tunisia are autonomous local authorities responsible for coordinating regional development, representing citizens at regional level, and promoting equity between regions. They participate in planning, gather recommendations from the communes, and meet regularly to decide on local priorities.	- Coordinates with local councils to integrate their recommendations into regional projects. - Propose and design projects that align with the region's economic and social priorities and meet citizens' expectations.
A18	Office of Livestock and Pastures	The Office of Livestock and Pastures (OEP) is responsible for promoting and developing the livestock sector. It is responsible for the following tasks: (1) developing livestock productivity, (2) developing forage and pasture resources, (3) promoting livestock farming techniques, (4) monitoring the sector and contributing to its economic development and generally carrying out all the specific tasks entrusted to it by the State with a view to developing the sector.	- OEP takes care to preserve pastoral activity while promoting sustainable cohabitation with the project. - This stakeholder (in partnership with the CRDA above) could have a role in providing livelihood restoration measures if any impacts.
A19	Medical Centres: Local medical center of Beni Mhira	Given the nature of the renewable energy project and the presence of various species of snakes and scorpions in the area, a local medical center and an intermediate health center in Beni Mhira,	- Coordinates with medical centres to ensure the availability of antivenom and other critical care.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
	/ Intermediate health center of Beni Mhira	<p>despite the absence of an emergency vehicle, could play a key role in:</p> <ul style="list-style-type: none"> Supporting the project's emergency response plan, especially in cases of envenomation or bites and heat-related incidents. Ensuring the availability of antivenom treatments. Participating in coordination protocols with the plant's HSSE team and assisting in awareness-raising initiatives related to local health risks. Providing training or guidance on first-aid measures for site personnel. 	<ul style="list-style-type: none"> Raising awareness on potential project-related risks (heatstroke, snakebites).
B- Civil society organisations			
B1	NGOs – Tataouine	<p>In the Tataouine governate, and particularly in Beni Mhira, several NGOs contribute to social development, inclusion, and support for vulnerable populations, as below:</p> <ul style="list-style-type: none"> Association for support of people with reduced mobility in Beni Mhira works on the inclusion of persons with disabilities, community awareness, and access to social services. Local Community Development Associations- Beni Mhira: Volunteer-based structures organizing social solidarity initiatives, cultural and community activities. Youth Commitees / Clubs in Beni Mhira: engage young people in sports, cultural, environmental, and awareness-raising activities. 	<ul style="list-style-type: none"> Support for persons with disabilities, including access to social and health services. Engaging youth in sports, cultural and environmental initiatives. Gender-based violence prevention, social support. The protection of women amongst local communities from negative interactions with the incoming project workforce. The protection of women in the workplace. The provision of assistance to women of economically displaced households.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		<ul style="list-style-type: none"> Tunisian Red Crescent of Tataouine: implement awareness sessions on gender-based violence, social support, and emergency response; occasionally intervenes in Beni Mhira. The sessions also provide guidance on the procedure to follow if they or their children are subjected to violence. This procedure involves filing a complaint with the Women and Children Protection. 	
C – Affected communities including displaced persons			
C1	Local communities	The closest local community to the project is Beni Mhira, located approximately 15 km away.	- Local employment opportunities that may be available for displaced persons and local people.
C2	Vulnerable groups	Vulnerable groups may be disproportionately impacted by the Project through changes in access to land and associated impacts to livelihoods, from increased road transport movements, and from the presence of an incoming and predominately male workforce.	<ul style="list-style-type: none"> - Economic displacement that impacts the community land management and land users. - Potential increased road safety risks from the movement of materials and personnel on the public road network. - The availability and operation of the Developer grievance mechanism.
C3	The community land management and land users (formal, informal, and seasonal)	<p>The construction and operation of the solar PV plant, the BESS and the substation will be carried out on land ceded by the community land management of Zorgane. The land is under private ownership of STEG under a purchase agreement registered on December 19th, 2017.</p> <p>The Solar PV plant site, the corridor of the transmission line and the access road have no infrastructure, already severely degraded,</p>	- Not initiate involuntary land acquisitions and restrictions on accessing land used for grazing activities.

No.	Entity	Involvement in the Project	Topics of interest to the stakeholder
		<p>and have no particular ecological or productive value, as its environmental characteristics are similar to those of the surrounding areas.</p> <p>The OHTL will have 3 summits (these designate a change in the direction of the OHTL) and mainly crosses land belonging to the community land management of Zorgane (1.1 km – 91%), the remainder crosses lands belonging to the community land management of Mhamedia.</p>	
D – Project Construction Workforce			
D1	Project construction workforce	<p>The continuation of existing worker contracts during construction for those already employed, and the generation of new employment positions during the construction stage.</p> <p>The risk of exposure from occupational health and safety hazards.</p> <p>The benefits from potential vocational and capacity development programs during construction.</p>	<ul style="list-style-type: none"> - Worker terms and conditions, including salaries and on-site accommodation and worker welfare facilities. - Occupational health and safety. - Training and capacity development opportunities.

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5 PREVIOUS CONSULTATION AND INFORMATION DISCLOSURE ACTIVITIES


This section provides a summary of the activities carried out and the main results and is aligned with the content of the project's Environmental & Social Assessment Report (ESAR) dated January 2026.

The objectives of the consultation and information disclosure activities were to:

- Disclose accurate information related to the project based on available information using maps and other tools in a culturally appropriate manner.
- Gather perspectives and opinions on the project and use local knowledge and expertise of stakeholders to identify key environmental and social risks and impacts that need to be considered during the environmental and social assessment of the project.
- Discuss E&S issues associated with similar previous projects to understand how environmental and social aspects were addressed, and to provide useful information for the preparation of the project's environmental and social assessment report.
- Identify environmentally and socially sensitive receptors if any that intersect with or are located near the solar PV plant, the OHTL and the BESS, and that should be avoided or studied in detail, with the aim of avoiding/minimizing risks and negative impacts where possible.
- Understand the risks to specific areas, including formal and informal land users, seasonal land use, and biodiversity concerns regarding risks to avian wildlife and other ecological receptors.
- Jointly identify gaps in environmental and social knowledge that need to be filled during later stages of the project through field surveys or similar activities.
- Gather views and opinions on the likely perceptions of local communities towards the project and how to manage them during the construction and operational phases of the project.
- Understand future permits and licenses, as well as compliance with standards to which the project must adhere, to ensure future compliance with national legislation.

5.1 REGIONAL GOVERNMENTAL ENTITIES: GROUP A


A consultation session with the key regional governmental entities took place on 12 January 2026 in the Tataouine Governorate. Throughout the consultations a leaflet was prepared and distributed to such stakeholder groups with key information that included a map of the project location. Details of the main infrastructure components (solar panels, the OHTL route, the substation and the Battery Energy Storage Solution (BESS)), the scope of the E&S assessment

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and planned stakeholder engagement was provided using a presentation. The table below presents a summary for the outcomes of the stakeholder consultation undertaken with regional government entities.

Table 5-1: Summary of stakeholder engagements undertaken to date

Stakeholder	Key summary
<p><u>Date: 12 January 2026</u></p> <p>Participants 26 people, including the Governor of Tataouine, 1 EBRD, 6 STEG and 3 EAM.</p> <p>Representatives from the following regional departments:</p> <ul style="list-style-type: none"> • Regional Departments of Vocational Training and Employment • National Heritage Institute • Tataouine Regional Council • Beni Mhira Local Council • Directorate-General for State Property and Land Affairs • National Guard • Regional Directorate for Equipment and Housing • Regional Development Commission of Tataouine • Regional Commission for Agricultural Development (CRDA) • Regional Directorate for Civil Protection of Tataouine • Member of the regional council 	<p>1. Project Schedule Compliance and Facilitation of Authorisations</p> <p>- The governor of Tataouine insisted that the project be completed on schedule, with no delays, and that all relevant authorities take the necessary measures to facilitate the obtaining of the required authorisations. He asked regional authorities to facilitate the authorisation procedures and to issue all necessary authorisations for the project's completion as soon as possible.</p> <p>2. Land tenure and local governance arrangements</p> <p>- The Delegate of Beni Mhira specified that the PV project site is located on land ceded by the community land management of Zorgane. In addition, he mentioned that one pylon will cross lands belonging to the community land management of Mhamedia. The management board renewal is ongoing, and an exceptional extension of the current mandate has been requested by the Governor to avoid Project delays. In this case, constructive land discussions with relevant authority are recommended.</p> <p>3. Technical innovation, energy performance and economic benefits</p> <p>- STEG highlighted that this Project is the first in Tunisia to integrate a Battery Energy Storage Solution (BESS) as part of a PV power plant.</p> <p>- The number of BESS units may be increased according to operational needs during the operation phase. The BESS will be installed in containerised units, allowing modular and flexible expansion.</p> <p>- The Project's Net Present Value (NPV) is estimated at approximately 250 million TND.</p>

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Stakeholder	Key summary
	<ul style="list-style-type: none"> - The Project will enable the avoidance of approximately 29,000 tonnes of gas consumption per year, corresponding to an estimated annual saving of around 33 million TND. - The Project makes a significant contribution to energy transition, national energy security, and greenhouse gas emissions reduction, and presents a strong investment attractiveness for both national and international investors. <p>4. Strategic positioning and international financing perspective</p> <ul style="list-style-type: none"> - The EBRD confirmed that the Project is considered strategic at the national level. It integrates a BESS with an initial capacity of 10 MW, representing a first-of-its-kind project in Tunisia at this scale. - The Project contributes directly to strengthening national energy independence. <p>5. Pastoral activities and land-use compatibility</p> <ul style="list-style-type: none"> - The Regional Development Commission of Tataouine requested that the possibility of creating grazing corridors within or around the project site for camels and sheep be explored, in order to maintain local pastoral activities, drawing inspiration in particular from successful experiences in China (e.g. ensuring that the posts supporting the solar panels are of sufficient height). <p>6. Site security and infrastructure protection</p> <ul style="list-style-type: none"> - The Regional Council inquired whether a perimeter fence has been installed around the Project site. - Civil Protection Highlighted the need to prepare a safety study due to the presence of battery storage, as the project falls under Category 3 of Heading 1601 (Accumulators), given that the maximum DC power exceeds 2.5 kW.

Photos of the regional governmental entities' consultation are presented below:



Photo source: Official Facebook page of the governorate of Tataouine.

Figure 5-1: Photo of the meeting with governor of Tataouine

5.2 BENI MHIRA LOCAL COMMUNITY AND LAND USERS

The following consultations were conducted on 12 January 2026 at the public library of Beni Mhira, involving small group discussions with local residents: 10 women and 34 men.

The consultation with the local community was organized by the delegate of Beni Mhira at the request of the Developer (STEG), in response to the recommendations of EAM. A leaflet was used to include an overview of the Project and printed maps were provided to present a map of the Project. The table below presents summary for the outcomes of the stakeholder consultation undertaken, while the figure that follows presents sample photos.


Table 5-2: Summary of stakeholder engagements undertaken to date

Stakeholder	Key summary
Group of 34 men in Beni Mhira Location: Public library	<ul style="list-style-type: none"> - The region of Beni Mhira, in the governorate of Tataouine, has a population of around 8,600. - There is no ethics committee or representatives of semi-nomadic communities in the town; the inhabitants are all originally from Beni Mhira. - Beni Mhira is an agricultural, non-industrial area, with grazing and olive cultivation as the main agricultural activities. - Grazing activities are carried out by the inhabitants, and there are no quarries in the project area. - Residents have reported the presence of two important cultural sites near the project: Ksar Hmidia and Ksar Chkika. - Electricity is supplied by STEG, but the service is poor, with frequent power cuts. - The quality of drinking water is poor, with frequent interruptions in supply.

Stakeholder	Key summary
	<ul style="list-style-type: none"> - Household waste is collected and disposed of by the municipality. - There is a health clinic and an intermediate health center in Beni Mhira, but the latter is not equipped with an ambulance. - Telecommunications network coverage is insufficient. - There is a high risk of accidents, particularly on the road leading to the project site. Les habitants ont souligné qu'il n'existe pas de protection civile à Beni Mhira. - Residents have requested training in renewable energy so that they can work during the project's construction phase. - They wish to be given priority in recruitment, in recognition of their voluntary contribution in giving up their land for the project. They suggested that STEG support farmers and livestock breeders, in particular by conducting in-depth surveys on livestock. - They proposed that STEG include the construction of a sports complex in Béni Mhira in its community development programme.
<p>Group of 10 women in Beni Mhira Location: Public library</p>	<ul style="list-style-type: none"> - The women of Beni Mhira play several important socio-economic roles in the community. - A significant number of women work in the public sector, particularly in education, culture and health. - Other women are involved in craft and traditional activities, such as Margoum (مرفوم) sewing and other local crafts. - Recently, a training center dedicated to rural girls was inaugurated in Béni Mhira, offering training in sewing, tailoring, hairdressing, aesthetics and pastry, with the aim of strengthening their professional skills and improving their chances of integration into the labor market or the creation of economic activities. Other women participate in poultry farming and agricultural work on family farms. - The migration of several young men to France has helped improve their families' standard of living but has also led to a decline in the number of young people in the region. - No cases of violence against women have been reported in Beni Mhira. - No vulnerable groups have been identified in the governorate of Tataouine. - Women in Tataouine wish to receive support to develop their economic activities, particularly through the marketing of their products and the creation of family businesses in the agricultural sector.



Figure 5-2: Focus groups in the village of Beni Mhira

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6 FUTURE CONSULTATION AND DISCLOSURE ACTIVITIES

A summary of future stakeholder consultation and disclosure activities has been prepared and is presented in Tables below. The activities cover the following project stages:

- Stage 1 - Future consultation and disclosure of key Project documents, namely: Environmental and Social Assessment Report, Non-Technical Summary (NTS) and Stakeholder Engagement Plan (SEP);
- Stage 2 - Future consultation and disclosure during the construction stage;
- Stage 3 - Future consultation and disclosure during the operational stage.

The activities described include the stakeholders to be involved, the format of engagement used, how project information should be disclosed, and how awareness of the grievance mechanism should be improved during each engagement activity.

During the project (construction and operation), an annual report on environmental and social performance will be prepared each year with the aim of providing stakeholders with information covering relevant areas. It will include a summary of how stakeholder feedback has been used to refine the project design, an updated schedule, details on the workforce recruited and their welfare conditions, a breakdown of capital spent through procurement from national/regional/local suppliers for the provision of materials and services, ongoing consultation and disclosure activities with stakeholders, complaint management and contact details for the mechanism, a summary of environmental monitoring for specific areas (which will likely include occupational health and safety performance, noise, water consumption, waste generation and management), and any other relevant topics.

Additional activities will be undertaken by the Developer to disclose the annual environmental and social performance report to stakeholders in group A using leaflets and other tools, all in French and Arabic.


Table 6-1: Stage 1 - Future consultation and disclosure of key Project documents

Stakeholder category	Consultation and disclosure activities
<ul style="list-style-type: none"> Ministries, national government agencies, regional government, municipal authorities Environmental and social NGOs 	<p><u>Electronic link to Project files:</u></p> <p>The electronic link to the Project disclosure files (NTS, SEP) to be available on the EBRD website and STEG Website, with separate files for French and Arabic.</p> <p><u>Consultation with Ministries, national government agencies, regional government, municipal authorities, and Environmental and social NGOs:</u></p> <ul style="list-style-type: none"> An official letter from the Developer inviting them to review the contents of the disclosure file and a printed copy of the NTS using an electronic link to large, printed maps showing the location of the PV plant and the OHTL and the ESAR, NTS, SEP. All files/maps to be available in French. It is understood that press and media will be invited to the consultations.
<ul style="list-style-type: none"> Local communities, vulnerable people, the community land management of Zorgane and Mhamdia, land users, and herders of Beni Mhira 	<p>Consultation with Beni Mhira community</p> <ul style="list-style-type: none"> A public meeting organized at the Beni Mhira library (Focus group of both men and women) and a separate meeting reserved for women. <p>Disclosure tools: Large printed maps showing the location of the PV plant, the OHTL and the BESS. A Project Information Leaflet. Printed copies comment forms to be used adjacent to comment boxes. All available in Arabic.</p>

Table 6-2: Stage 2 – Future consultation and disclosure activities during the construction phase

Stakeholder category	Consultation and information activities
<ul style="list-style-type: none"> Ministries, national government agencies, regional government, municipal authorities, local health centres; 	<p>An official letter from the Developer (STEG) indicating the upcoming start of the construction phase in order to provide stakeholders with details on the current status of construction work and the final design of the solar PV power plant, OHTL and BESS.</p> <p>Individual meetings with stakeholders when specifically requested.</p> <p>Disclosure tools: A link to the latest set of GIS maps available for the project and SEP / NTS, to be published on the Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French).</p> <p>Frequency: The letter to be issued at least 3 months before the start of construction work, followed by updates at key project milestones or whenever there are significant changes in schedule, design, or anticipated impacts, until the completion of construction.</p> <p>Coordination with the Civil Protection for approval of the Safety study.</p>
<ul style="list-style-type: none"> Local communities, vulnerable people, the community land management of Zorgane and Mhamdia, land users, and herders of Beni Mhira 	<p><u>Activities:</u></p> <ul style="list-style-type: none"> A public meeting at Beni Mhira community to include a separate public meeting with local women, undertaken every 6 months during construction. Engagements with vulnerable people living in Beni Mhira community which include elderly people and others who are not likely to attend the public meetings (refer to Section 6.1), undertaken every 6 months during construction. Engagements in local primary schools to inform young people of community health and safety risks undertaken every 6 months during construction. <p><u>The activities to discuss the following topics using maps and the Project Information Leaflet:</u></p> <ul style="list-style-type: none"> A brief summary of the construction stage including installation of the perimeter fences and the presence of the


Stakeholder category	Consultation and information activities
	<p>workforce. This will include the future restrictions on land access within the solar PV plant.</p> <ul style="list-style-type: none"> ▪ The locations of the OHTL pylons and details of future land use restrictions below the OHTL RoW. ▪ Community health and safety risks associated with people trying to enter the construction site, and the future risks of people trying to climb the pylons during the operational stage. ▪ The process used to recruit local people during the construction stage. ▪ The grievance mechanism that can be used to raise a concern including the use of CLOs to help the developer interact with the community, and also for the community to raise concerns about the project should they wish to do so. ▪ The controls used to ensure that all road movements are completed safely. ▪ The Projects use of water and the generation of wastewater, and the controls to prevent pollution. ▪ The projects generation of waste and the controls to prevent pollution. ▪ The potential future generation of noise and air emissions including dust ▪ The presence of the worker camp if required and the Worker Code of Conduct to ensure responsible behaviour of the workforce at all times. ▪ A time for questions and answers.
<ul style="list-style-type: none"> • Environmental and social NGOs 	<p>An official letter from the Developer indicating the upcoming start of the construction phase to provide stakeholders with details on the current status of construction work and project design.</p> <p>Individual meetings with stakeholders when expressly requested by them.</p> <p>Disclosure tools: A link to the latest set of GIS maps available for the project and SEP / NTS, to be published on the</p>

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Stakeholder category	Consultation and information activities
	<p><i>Developer's website (Arabic and French). Project Information Leaflet to be available (Arabic and French).</i></p> <p>Frequency: <i>The letter to be issued at least 3 months before the start of construction work, followed by updates at key project milestones or whenever there are significant changes in schedule, design, or anticipated impacts, until the completion of construction.</i></p>

Table 6-3: Stage 3 - Future Consultation and information activities during the operational phase

Stakeholder category	Consultation and information activities during the construction phase
<ul style="list-style-type: none"> Ministries, national government agencies, regional government, municipal authorities, local health centres. Environmental and social NGOs 	<p>Submission of an annual environmental and social performance report available in French and Arabic.</p> <p>Individual meetings with stakeholders when necessary.</p> <p>Disclosure tools: <i>The annual environmental and social performance report.</i></p>
<ul style="list-style-type: none"> Local communities, vulnerable people, the community land management of Zorgane and Mhamdia, land users, and herders of Beni Mhira 	<p>Summary of the annual environmental and social report integrated into a 3–4-page printed summary to provide details on the risks and impacts of operational communities, and to raise awareness of the complaint management mechanism.</p> <p>Every 6 months, individual meetings with the community land management of Zorgane and Mhamdia, land users, and herders who graze in the project area to remind them of the height restrictions associated with land use activities during the operational phase.</p>

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6.1 SPECIFIC MEASURES FOR CONSULTATION AND DISCLOSURE OF INFORMATION TO VULNERABLE GROUPS


The activities described in section 0 include specific provisions for engaging vulnerable groups among Group C stakeholders, so that they are also informed about the project, have the opportunity to participate in discussions related to the design, and their sources of vulnerability, views, and opinions are taken into consideration.

A summary of vulnerable groups is provided in Table 8.

The engagement with vulnerable groups described in the table below will initially be undertaken during the remainder of the environmental and social assessment process.

Table 6-4: Vulnerable persons and procedures for meaningful consultation

Description of the vulnerable group	How meaningful consultation will be undertaken
<i>Vulnerability in the context of planning stakeholder consultation and disclosure activities</i>	
Young people under the age of 18 who may: (1) engage in high-risk activities that older people are less likely to do, such as attempting to enter areas where construction work is underway; and (2) have a poor understanding of road safety risks.	Direct engagement with local young people resident in Beni Mhira community. Additional engagements in local schools may be required.
Women especially female-headed households may face limited access to information, restricted mobility and lower participation in decision-making due to cultural, social or economic barriers.	Direct engagement in livelihood compensation / restoration if any such impact.
People in poor health, people with disabilities, including wheelchair users, deaf and/or visually impaired people, and people with reduced mobility, who are unable or unwilling to participate in public consultations.	Direct engagement in displaced households.

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- The individual (or group representative) complaint's name (as long as the person wishes to disclose his/her name), their gender, details of their vulnerability (if any), physical address (where applicable), community they are resident in, or group name.
- Date, time, and place where the incident was experienced (where the grievance relates to a specific event).
- Description of complaints and the details of any third-party companies involved; and
- The preferred means of future communication with during the grievance resolution process noting any language preferences, and if an individual wishes to involve their own representative (such as a community leader) in all future communication.


Confidentiality of the grievance shall be maintained through keeping all paper records stored in a locked file that only the Developer has access to and using a secure password to keep electronic records confidential. The electronic grievance registry and paper records shall be used to record, on an ongoing basis, grievances as they are reported, evaluated and resolved.

7.4 STEPS TO BE TAKEN IF THE GRIEVANCE IS ASSOCIATED WITH GENDER-BASED VIOLENCE AND HARASSMENT (GBVH)

If a grievance is raised that is associated with GBVH then this shall be passed to a person within STEG who: (1) is the same sex of the person raising the concern; and (2) who has received training on the management of GBVH cases. If necessary, protection of the victim will be provided by the STEG which may include temporary housing and other actions to prevent future harm. Relevant stakeholders (such as women leaders in Beni Mhira community) will be requested to provide additional support, so that all of the actions STEG undertakes reflect local cultural norms and are aligned with the wishes of local community leaders and regional government. The same actions to prevent retaliation and protect confidentiality will be in place.

Additionally, no identifiable information on the survivor should be stored in the GRM and information apart from the three aspects related to the GBV incident will be recorded:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.
- The GRM will refer GBVH complaints and record the resolution of the complaint process.

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7.5 GRIEVANCE INVESTIGATION AND ATTEMPT AT RESOLUTION

After a new grievance has been recorded, the Developer (STEG) shall acknowledge receipt of the grievance within 4 working days by phone or using a written letter (Appendix 2). Thereafter, the Developer shall communicate with the individual/group who raised the grievance to learn as much as possible about the details. It shall be important to listen attentively to the person in order to reflect the fact that the Developer take grievances seriously, and to try and build a positive relationship with the individual/group at the start of the resolution process.

Thereafter, the Developer's CLO shall take responsibility to discuss the grievance with other personnel and other parties, where relevant, and propose a resolution response. The CLO shall subsequently communicate the response to the individual/group raising the grievance with the aim of resolving the issue. The target response time from the date a grievance is received until a resolution response is sent back is 15 working days. The CLO shall consider what recommendations are needed to try and ensure that a reoccurrence of similar grievances do not occur in the future.

Before the grievance is classified as being 'resolved' the CLO shall check with the individual/group that raised the grievance that they are satisfied with the response provided. The individual /group representative shall be asked to sign a Grievance Satisfaction Form indicating that they are satisfied with the response. If they are not satisfied, then they have the choice to appeal the decision to STEG's Sustainability Team as part of an internal review process.

NOTE: If the individual/group raising a grievance wishes to seek a judicial resolution before the final decision of the Developer, then the Developer shall continue the grievance resolution process in parallel and provide copies of all non-confidential and relevant documentation needed for the judicial process.

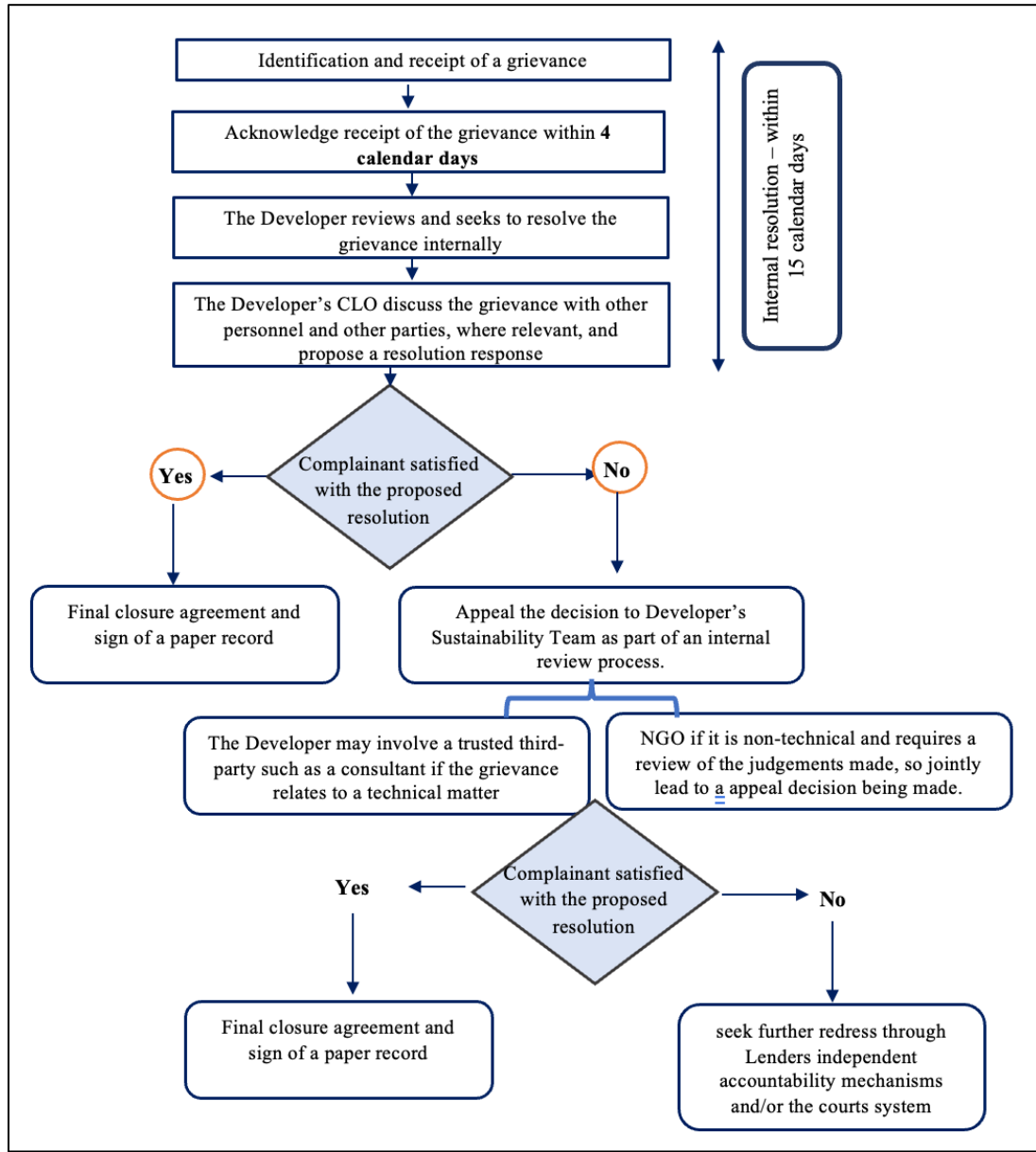



Figure 7-1: Grievance Mechanism Flowchart

7.6 STEPS TO BE TAKEN IF THE GRIEVANCE IS ASSOCIATED WITH GENDER-BASED VIOLENCE AND HARASSMENT (GBVH)

If a grievance is raised that is associated with GBVH then this shall be passed to a person within STEG who: (1) is the same sex of the person raising the concern; and (2) who has received training on the management of GBVH cases. If necessary, protection of the person

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who has been subjected to GBVH will be provided by STEG. The same actions to prevent retaliation and protect confidentiality will be in place.

7.7 SUPPORTING DOCUMENTS


The following supporting documents/files accompany this Grievance Mechanism:

- Electronic grievance log; and
- Paper grievance reporting and acknowledgment form.

7.8 MONITORING

The following performance indicators shall be used to check the effectiveness of implementation of the grievance mechanism:

- **Usage** – the target is for all grievances (100%) to be channelled through the Grievance Mechanism before the concerns of an individual, group or community are raised to another entity, such as a national regulator or media outlet.
- **Number** – the number of grievances received each month shall be closely monitored to identify trends in the frequency and type (see below) of grievances that are being raised.
- **Type** – the number of grievances associated with specific topics such as:
 - The behaviour of the workforce towards community members including harassment and GHVH
 - The use of vehicles on the public network (damage, community safety risks)
 - The inappropriate behaviour of security personnel
 - The way in which local people were selected for recruitment by the EPC Contractor
 - Stakeholder engagement, information disclosure and consultation.
 - The effectiveness of the grievance mechanism to resolve concerns quickly.
 - Environmental pollution including noise, air emissions and dust, soil and groundwater pollution, waste management.
 - Impacts to water resources.
 - Impacts to landowners and land users.
 - Impacts to cultural heritage resources
- **Gender and vulnerability** – the gender of individuals raising grievances shall be recorded and reported separately, as well as details of any vulnerability.
- **Community** – the name of the individual/group/community are resident in shall be recorded.

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- **Resolution time** - the target for the resolution of grievances is 20 calendar days, starting from the date the grievance was recorded. All appeals to the decision of the grievance are expected to be fully resolved within a further period of 20 calendar days, starting from the date the initial response was provided to person raising the grievance; and
- **Reoccurrence** – ideally there should be no (or at least a consistent reduction) in the type of grievances that are raised on similar issues over time. This is expected to be achieved by implementing improvements in working procedures and broader stakeholder engagement activities, with the objective of demonstrating continual improvement.

7.9 NOTIFICATION ARRANGEMENTS SPECIFIC TO GBVH

If a GBVH-related grievance is raised, this shall be notified by the STEG to Lenders within a period of 2 working days.

7.10 ACCESS TO LENDERS INDEPENDENT ACCOUNTABILITY MECHANISMS

All projects financed by EBRD shall be structured to meet the requirements of the EBRD [Environmental and Social Policy \(2024\)](#) which includes ten Environmental and Social Requirements (ESRs) for key areas of environmental and social sustainability that projects are required to meet, including ESR10 Stakeholder Engagement. In addition, [EBRD's Independent Project Accountability Mechanism \(IPAM\)](#), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

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8 MONITORING AND ASSESSMENT

The implementation of the SEP shall be monitored with the objective of improving the way in which stakeholder consultation and disclosure activities are conducted over the lifetime of the Project. STEG shall undertake a monthly review of the SEP's implementation process and gather information from KPIs for internal discussion and review. This shall take the form of a workshop which is facilitated by STEG.


The agenda of the monthly internal workshop will include the following:

- Introductions and objectives of the workshop;
- Review of the SEP's KPIs;
- Review of the grievance register;
- Review of recent stakeholder engagements records; and
- Review and discussion of the current SEP implementation process and assess where additional resources are required.


Monitoring of the SEP shall be undertaken using the indicators presented in Table 8-1.

Table 8-1: Monitoring and evaluation indicators

Indicator	Information Source	Frequency
Overall spending by each SEP budget category	Financial records	Monthly
Distribution of spending by: <ul style="list-style-type: none"> - Internal personnel - Funding external public events such as public meetings - Funding traditional media and press releases 	Financial records	Monthly
Number of staff dedicated to implementation of the SEP	Human Resources Department	Monthly
Number of stakeholder engagements undertaken with: <ul style="list-style-type: none"> - Women-only groups of local residents - Local residents (men and women) - NGOs and civil society groups 	Stakeholder engagement records	Monthly
Number of times details of the Project have been disclosed publicly using various formats (traditional printed media, social media, TV/radio, other formats)	Disclosure records	Monthly
Number of grievances that have been raised (in total).	Grievance record	Monthly
Number of grievances that have been raised through an	Grievance record	Monthly

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Indicator	Information Source	Frequency
anonymous submission.		
Number of grievances that have been acknowledged within the target time frame.	Grievance record	Monthly
Number of grievances that have been investigated and a proposed resolution submitted to the person raising the grievance within the target time frame.	Grievance record	Monthly
Number of grievances that have has the proposed accepted.	Grievance record	Monthly
Number of grievances that are being processed through mediation.	Grievance record	Monthly
Number of grievances that are being processed in a court of law.	Grievance record	Monthly

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9 IMPLEMENTATION RESPONSIBILITIES

9.1 IMPLEMENTATION RESPONSIBILITIES


The project will be implemented by the developer, who will have the necessary staff resources and capacity to implement the SEP in accordance with the combined requirements of national legislation and the EBRD Environmental and Social Policy (2024).

The following staff will be required for the successful implementation of the SEP:

- Stakeholder Engagement Manager
- Community Liaison Officers
- The roles and responsibilities for the implementation of the SEP are outlined in Table 9.1 and include the Developer and the EPC contractor.

Table 9-1: Roles and responsibilities for implementing the SEP


Role	Responsibilities
STEG Stakeholder Engagement Manager	<ul style="list-style-type: none"> - Approve the SEP and review the document as necessary, each year. - Ensure that STEG's internal personnel have adequate training to implement the SEP. - Manage the Grievance Mechanism, including reporting on the current status of grievances included in the Grievance Register. - Provide guidance to the construction contractor on SEP-related activities.
STEG Community Liaison Officers	<ul style="list-style-type: none"> - Organise and facilitate all stakeholder engagement activities including inviting stakeholders to attend, preparing suitable disclosure tools, taking minutes of meeting records, and undertaking any follow-up actions necessary. - Ensure that the specific measures designed to ensure consultation and disclosure of information with vulnerable people are implemented in accordance with the SEP. - Raise awareness and use the Grievance Mechanism, including reporting on the current status of grievances included in the Grievance Register. - Provide guidance to the construction contractor on SEP-related activities.
EPC Contractor	<ul style="list-style-type: none"> - Comply with all relevant provisions that are included in the SEP.

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Role	Responsibilities
	<ul style="list-style-type: none"> - Channel all grievances raised to STEG for them to record and investigate. - Provide general assistance to STEG in the implementation of the SEP.


9.2 CHANGE MANAGEMENT

A Change Management Procedure shall be part of the construction contractor's Environmental and Social Management System (ESMS), which is collection of policies, procedures, and topic-specific management plans that describe the way in which E&S risks and impacts are to be managed. A formal procedure shall be developed that aims to screen changes in the Project so that based on certain materiality thresholds, the need to undertake additional stakeholder consultation and disclosure activities are identified, assessed, and responded to. This may include, for example, the need to inform stakeholders about changes in the Project's design, the start of construction, or other material aspect.

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APPENDIX 1: Grievance Mechanism Leaflet

STEG aims to resolve Grievance as quickly as possible and has established a Grievance Redress Mechanism specific to the 50 MW Solar and 10 MW/20MWh BESS with associated Transmission Line project in Beni Mhira, governorate of Tataouine Any individual, group, or other stakeholder may contact the Developer and file a grievance that is relevant to the Project. This includes the actions of STEG’s employees, STEG’s contractors, and other activities relevant to the Project.

- To contact SSTEAG please use the contact details provided below:
- by post to the following address 38 Rue Kamel Ataturk, 1080 Tunis / BP 190, 1080 Tunis cedex ;
- by e-mail (dpsc@steg.com.tn/ wbenkhaled@steg.com.tn) ;
- Telephone call to STEG switchboard (+216) 71 341 311/Project Manager and Head of department DPEC/DEMPE/DCEQ: Wajdi BEN KHALED Tel: (+216) 27 633 222
- Telephone call via the free number of the call centre displayed at the worksites;
- Expressed verbally to the site controller, development manager, project manager or any other STEG employee;
- Mail or telephone call to the districts, STEG agencies and the Citizen Relations Office.

All grievances raised shall be immediately recorded into a central Grievance Register. The following information shall be requested:

- Your (or your group’s) name and address (community name) and full contact details.
- A detailed description of complaint, where this occurred, and details of any third parties involved (such as a contractor).
- Your preferred means of future communication so that we can regularly contact you in the future during the resolution process.
- How you wish the complaint to be resolved.

Please note that you are not obliged to provide your name and contact details if you do not wish to do so. STEG accepts all grievances even if these are raised anonymously. A Grievance Form is included on the last page of this leaflet which can be used to raise a grievance. STEG will provide any form of support necessary to complete the Grievance Form should this be required, due to literacy or other type of challenge.

Once the grievance has been raised and logged in the Grievance Register, the STEG Community Liaison Officer (CLO) will acknowledge this to you within 4 working days and


APPENDIX 2: Grievance Register, Paper Form, Acknowledgement Form, and Grievance Satisfaction Form

Grievance register

Grievance Log			
Name of recorder:			
Date last updated:			
Version number:			

Colour coding	
Ongoing	
Closed-out	
Appeal process	

		Recording Actions							Response Actions							
Grievance Ref No.	Status (see colour coding)	Date and time received	Identify of the person/group raising the grievance, physical address, community they are resident in, or group name (or mark as anonymous)	Summary of the grievance and details of any third-parties involved	Gender and vulnerability profile of the person raising the grievance (as relevant)	Communication preferences and details of representation for the grievant	Grievance Topic	How the grievant wishes to resolve the issue	Date the Grievance Acknowledgement Form was issued	Who is leading the investigation of the grievance?	What was the proposed response?	Number of working days the response was provided:	Has the proposed response been accepted?	Was an appeal raised?	Outcome of the appeal and date of the appeal ruling	What actions were undertaken to prevent a re-occurrence of the grievance from occurring in the future?
1																
2																
3																
4																
5																


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Paper Submission Form

GRIEVANCE FORM		
<i>Please complete the form entries below. Remember that you can submit an anonymous grievance should you wish to do so by leaving the first part of the form blank.</i>		
Identify of the person/group raising the grievance, physical address, community they are resident in, or group name (or mark as anonymous):		
Please indicate your communication preferences whilst we investigate the grievance and later respond to you:		
Date and time of the grievance:		
Summary of the grievance and details of any third-parties involved		
<i>Please indicate here what took place and provide details of individuals, companies, or other people involved:</i>		
Your suggestion to resolve the grievance		
Please indicate here what steps you suggest are taken by STEG to resolve the grievance:		
Date of submission		
Signature of person who raised the grievance:.....		
Date:.....		


NOTE: A copy of this completed paper form should be passed to the person who has raised the grievance for their review and signature. Their signature indicates that they accept the proposed resolution response to the grievance which should then be implemented.

Remember that if they do not accept it, then they have the right to appeal in accordance with the Grievance Mechanism.

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ACKNOWLEDGEMENT FORM
ACKNOWLEDGEMENT FORM

<i>The STEG's CLO to complete the form below and send a printed copy to the person raising the grievance (by email or hand-delivery).</i>	
Identify of the person/group raising the grievance, physical address, community they are resident in, or group name:	
Your communication preferences whilst we investigate the grievance and later respond to you:	
Date and time of the grievance:	
Summary of the grievance and details of any third-parties involved	
Date of acknowledgment	
Signature of person issuing this form:..... Date:.....	

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PAPER SATISFACTION GRIEVANCE FORM

PAPER SATISFACTION GRIEVANCE FORM	
<i>Please complete the form below. If you do not wish to accept the proposed resolution response then an appeal can be raised in accordance with the STEG Grievance Mechanism.</i>	
Grievance Form reference number:	Date Form completed:
Name and details of the STEG representative completing the Form:	Time Form completed:
Name of the person who raised the grievance:	
Proposed resolution to the grievance	
Acceptance of the proposed resolution	
Do you accept the proposed resolution? Yes / No	
Signature of person who raised the grievance:.....Date:	
Name of the STEG representative completing this Form:.....Date:.....	
Acceptance refused - so appeal raised? Yes / No.....	

NOTE: A copy of this completed paper form should be passed to the person who has raised the grievance for their review and signature. Their signature indicates that they accept the proposed resolution response to the grievance which should then be implemented.

Remember that if they do not accept it, then they have the right to appeal in accordance with the Grievance Mechanism.