STAKEHOLDER ENGAGEMENT PLAN (SEP)

100 MW Kairouan Solar Power Project in Kairouan – Tunisia

Prepared by :

Safety & Environment

Tél. : +216 71 947 394 Fax : + 216 71 947 398

October 2022

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1.0 INTRODUCTION

1.1 Background

The consortium coordinated and led on an operational day-to-day basis by AMEA Power (hereafter referred to as "the Developer"), was awarded in December 2019, an agreement for the development of a 100 Mega Watt (MW) Photo Voltaic (PV) Solar Power Plant in the governorate of Kairouan, Tunisia (hereafter referred to as "the Project").

AMEA Power was founded in 2016 and is headquartered in Dubai, UAE. The company is an Emirati company active in renewable energies. It acquires, develops, owns and operates thermal and renewable energy projects in Africa, the Middle East and Asia. The Project Company, a special purpose vehicle, Kairouan Solar Plant Sarl. ("KSP") is in the process of being set-up.

The Kairouan Project has two components:

- The solar plant (100MW), that will be built and operated by the Developer;
- The transmission line (8 km long – 225kV), that will be built and operated by the Tunisian Company of Electricity and Gas (Société Tunisienne de l'Electricité et du Gaz, STEG).

The Tunisian Company of Electricity and Gas is a public company under the supervision of the Ministry of Industry, Energy and Mines which has a monopoly on the transport and distribution of electricity and gas. Its main mission is to cover the needs of the country in electrical energy in the best economic, technical, and environmental conditions.

The developer who seeks financing for the project from international financial institutions (IFIs), including the International Finance Corporation (IFC) and the African Development Bank (AfDB), is inclined to design and develop the Project in accordance with international best practice – this includes undertaking the ESIA in accordance with the IFC Performance Standards (PSs) on Environmental and Social Sustainability (2012), and AfDB's Integrated Safeguards System (ISS).

It is worth noting that the 100 MW Kairouan solar photovoltaic project and its related facilities are classified as "Category B" according to the International Finance Corporation's (IFC) Performance Standards (PSs) for Environmental and Social Sustainability, and Category 2 according to the African Development Bank's (AfDB) Integrated Safeguard System (ISS).

1.2 Project Setup and Responsibilities

Different entities are involved in the planning and implementation of the Project. Responsibilities along with a general role description of each entity are listed hereafter:

- *AMEA Power:* AMEA Power is an Emirati company active in renewable energies. AMEA will be the owner and developer of the Project (hereafter referred to as 'the Developer);
- *General Directorate of Energy and Renewable Energies (DGEER)*: the regulator of the energy sector authorizing the development of energy production activities from renewable energy sources (PV and wind power).
- *National Environmental Protection Agency (ANPE):* the official governmental entity responsible for protection of the environment in Tunisia. The Agency is responsible for granting environmental clearance for the Project.
- *Engineering, Procurement, and Construction (EPC) Contractor:* will be responsible for preparing the detailed design and layout of the Project; supply of the material and equipment (panels, inverters, etc.); construction of the Project and its various components (mounting structure, internal roads, building infrastructure, and, etc.). Le contractant EPC est une joint venture entre Northwest Electric Power Design Institute Co., LTD. Of China Power Engineering Consulting Group (NWEPDI) et Tianjin Electric Power Construction Co., Ltd.(TEPC).*Project Operator:* the responsible for Operation and Maintenance (O&M) of the Project. The Project operator has not been assigned yet;
- *Tunisian Company of Electricity and Gas (STEG):* will be of the off taker of electricity and is the entity that signed the Power Purchase Agreement (PPA) with the Developer. In addition, STEG will be responsible for designing, building and operating the associated interconnection facilities. This will include the Overhead Transmission Line (OHTL) to be connecting the Project site to the existing national grid.
- *ESIA Consultant (EAM together with ECO Consult, Jordan and Environmental & Social Advisory Services, ESAS-UK):* hereafter referred to as the 'ESIA Team' who is the ESIA Practitioner and the consultant commissioned by the Developer to prepare the ESIA for the Project in accordance with local requirements as well as international best practice Environmental and Social (E&S) requirements.

1.3 Methodology and aim

The purpose of the SEP is to identify relevant stakeholders, define communication channels, and describe the way in which information associated with the Project will be provided to stakeholders to achieve meaningful and informed, consultation and participation.

The SEP has been prepared in accordance with applicable national legislation, the International Finance Corporation (IFC) Performance Standard 1 (PS 1: Assessment and Management of Environmental and Social Risks and Impacts) and the African Development Bank (AfDB) Operational Safeguard 1 (OS 1: Environmental and social assessment).

The SEP seeks to define a technically and culturally appropriate approach to consultation, disclosure and provide an accessible grievance mechanism. The SEP describes specific measures that shall be used to ensure the inclusion of vulnerable groups and women.

The SEP is a live document which will be updated prior to the start of Project construction, prior to the start of operations and, and then will be reviewed annually during operations.

In particular, this SEP includes the following:

- **Chapter 2 – Project Description:** provides a summary of the Project location, main Project components, Project schedule and job opportunities.
- **Chapter 3 – Regulatory Context:** highlights the main requirements that are relevant for stakeholder engagement to the Project, including applicable national legislation and Lender standards;
- **Chapter 4 – Summary of Past Stakeholder Engagement Activities:** provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project, and their key findings;
- **Chapter 5 – Identification of Stakeholders:** identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;
- **Chapter 6 – Stakeholder Engagement Strategy and Plan:** identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe and responsibilities;

- **Chapter 7 – Contact Details:** provides contact details of the Developer for communication with all relevant stakeholders of the Project;
- **Chapter 8 – Stakeholder Grievance Mechanism:** identifies a mechanism for managing and handling any concerns or complaints related to the Project during the construction and operation phase, particularly from affected stakeholder and communities.

2.0 PROJECT DESCRIPTION

2.1 Project Location

The Kairouan photovoltaic power plant is located about 1 km from the industrial area of Sbikha and 12 km North Kairouan city. The nearest settlement is Metbasta, at about 3 km South of the site. Administratively, the solar plant is a part of the El Alam sector in the delegation of Sbikha within the governorate of Kairouan, Tunisia. The site is accessible by the national road RN-2 linking Enfidha to Kairouan and the regional road RR-171 connecting Metbasta to Sbikha. The solar plant will be constructed on a leased land of 200 hectares, reasonably flat, well exposed, easily accessible, and whose ground is sufficiently compact to install a solar plant.

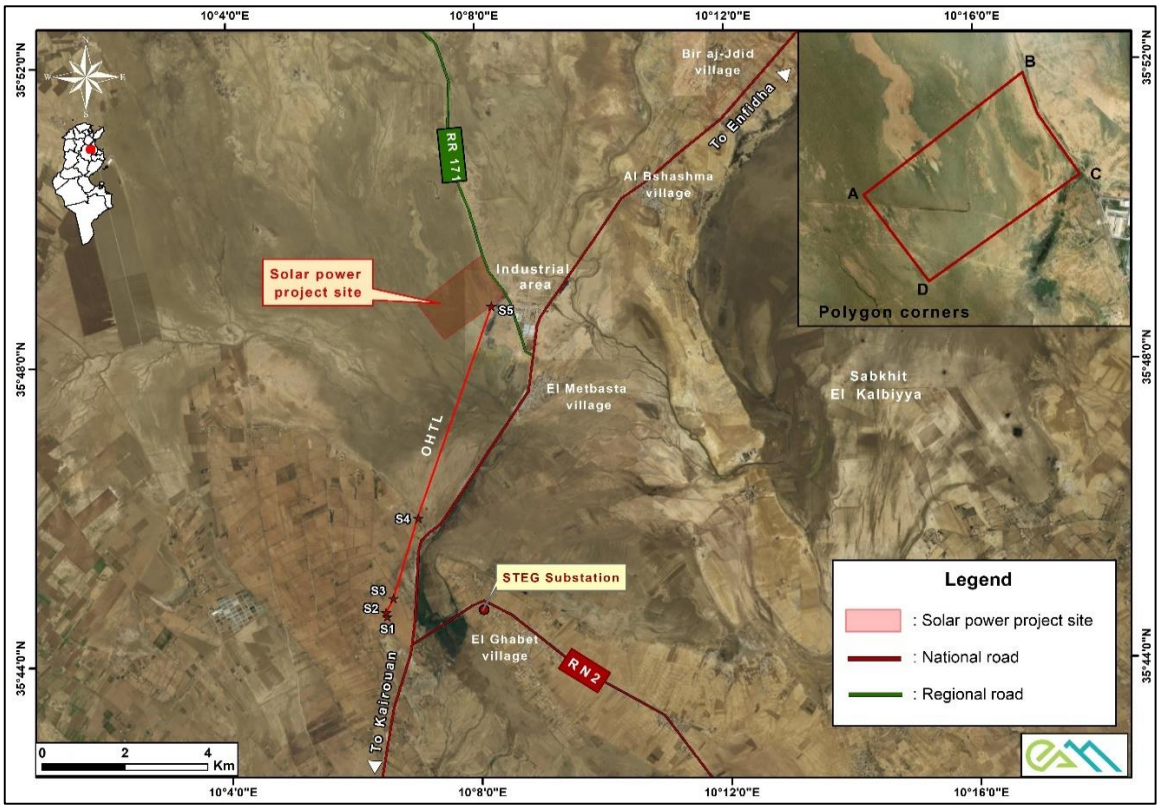


Figure 1: Site Location Map

2.2 Project Components

The key components of the Project are the power arrays which are composed of PV panels, converting solar energy (radiation from the sun) into electricity. Throughout the site the PV Panels are expected to be of crystalline solar module technology which utilizes silicon as a semiconductor material for generation of electricity for a total capacity of 100MW. Each array is equipped with a horizontal beam tracker which carries the array and orients it towards the sun throughout the day to maximize the amount of energy produced.

In addition, there are infrastructure and utilities which will serve the Project and which include underground cabling, central inverter stations, substation, building infrastructure (control room and storage), monitoring system, fencing, internal road network and on-site water reservoirs.

The Project is expected to provide around 230-Gigawatt Hour (GWh) of electricity per year. As a base for comparison, such electricity is enough to power around 42,878 households in Tunisia.

In addition, the Project will result in crucial positive environmental and economic impacts on the strategic and national level given the current challenges the energy sector in Tunisia is facing. Such positive impacts underpin rationale for the Project. These include the following:

- The Project allows for more sustainable development and shows the commitment of the Government of Tunisia to realizing its Energy Strategy and meeting the set targets for renewable energy sources;
- The Project will contribute to the national grid and reach end users and help meet the increasing electricity demands throughout Tunisia – as opposed to meeting such increasing demands through conventional electricity production from thermal power plants. The expected electricity generation from the Project will serve the annual electricity needs of 42,878 local households;
- The Project will produce clean energy which will contribute to lowering electricity generation costs when compared to the current costs associated with liquid fuels, and thus leads to a substantial decrease in the Government of Tunisia's fiscal deficit; and
- The operation of a solar power plant in Kairouan with an installed capacity of 100 MW will have a positive impact on air quality in general and is a means of combating global warming, as it is a clean energy production system that does not generate greenhouse gases during its operation, it does not produce any hazardous waste and does not emit any local pollutants. The project will likely displace more than 117,000 tons of CO_2 per year.

2.3 Project Schedule

The construction activities will start early 2023 for a duration of 16 months. Commercial operation of the Project is expected to commence in 2024 for a period of 20 years.

2.4 Characteristics of affected communities

2.4.1 Population

The study area belongs to the delegation of Sbikha which is administratively under the jurisdiction of the governorate of Kairouan.

According to the latest census carried out during the year 2014, the Sbikha delegation had 71,922 inhabitants grouped into 16,168 households and 18,115 housing (INS, 2014).

According to the INS estimate, the population of the Sbikha delegation was 74,464 inhabitants in 2018.

For the below sections of statistics on demography and education, data is available only at the scale of the governorate and the delegations.

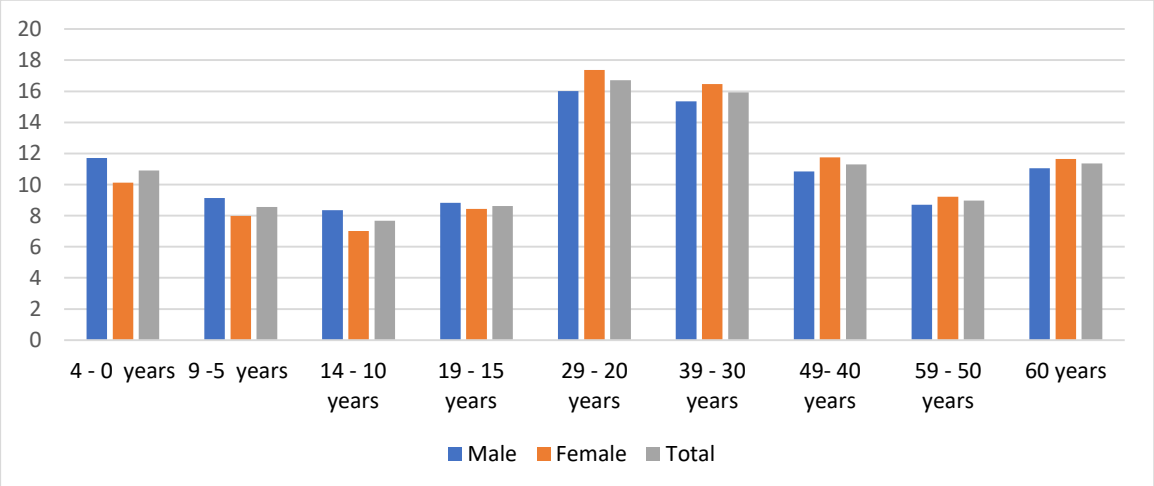
2.4.2 Demographic Data

The distribution of the population by gender and the projection of the population by gender and age groups in the Sbikha delegation are provided in Table 1 and Figure 2, respectively.

Table 1. Distribution of the population by gender

Region	Male	Female	Total
Delegation of Sbikha	35 224	36 698	71 922
Delegation of Kairouan Nord	47 834	48 947	96 781
Governorate of Kairouan	280 186	290 250	570 436
Tunisia	5 472 251	5 510 222	10 982 476

Source : INS, RGPH 2014



Source: INS, RGPH 2014

Figure 2: Distribution of the population by gender and age groups

The demographic structure of the Sbikha region is characterized by its youth, composed of almost as many males as female. Indeed, in 2014, the population aged between 20-29 years

represented about 17% of the total population of the region (INS, RGPH 2014).

2.4.3 Education characteristics

The education characteristics of the Sbikha delegation are illustrated in Table 2 and Figure 3, respectively.

Table 2. Education Characteristics (%)

Education level	Illiterate	Primary Education	Secondary education	Higher education	Population 10 years and older
Male	26.3	43.6	26.4	3.6	27 878
Female	52.9	26.5	17.3	3.3	30 049
Total	40.1	34.7	21.7	3.5	57 927

Source : INS, RGPH 2014

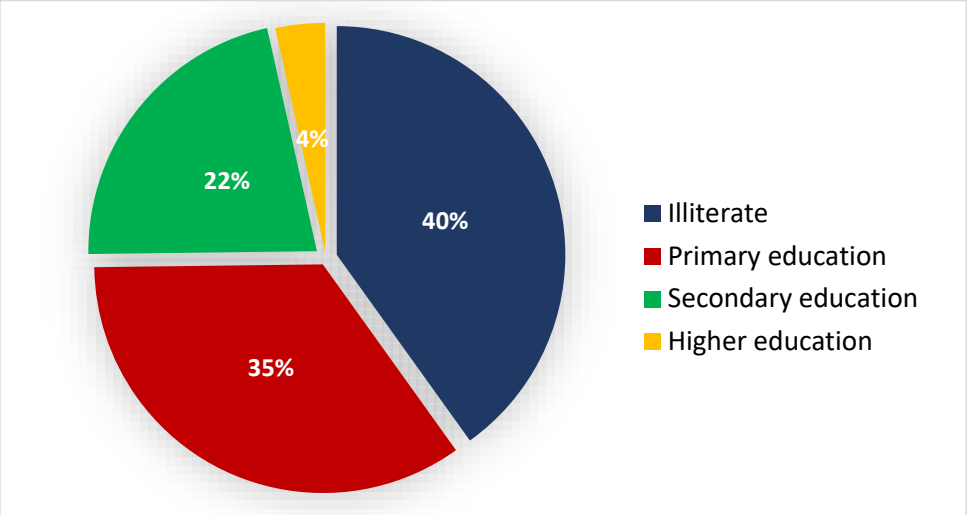


Figure 3: Distribution of the population 10 years and older by level of education in the Sbikha delegation

The data on educational characteristics indicates that the incidence of illiteracy is reduced for male in comparison to female.

Also, the rate of male in the different levels of education is higher than that of the female.

Job Opportunities

Summarized below are the job opportunities that were provided during the construction phase as well as the job opportunities anticipated for the operation phase of the Project.

- The project will provide approximately 450 jobs during the construction phase for duration of twelve (12) months which will include low-skilled labour (e.g., labourers) and skilled labour (engineers and management professionals). Where relevant, the Developer will prioritize all skilled and low-skilled job opportunities to the local communities and/or Tunisian residents in accordance with the Local Employment Plan.

- During operation, the Project will provide approximately 45 jobs for a duration of 20 years, which will include skilled labour (such as electrical and mechanical technicians) and unskilled labour (such as module cleaners). Where relevant, the Developer will prioritize all job opportunities to the local communities and/or Tunisian residents in accordance with the Operational Employment Plan.

3.0 REGULATORY CONTEXT

3.1 Tunisian Stakeholder Engagement Requirements & Legislation

There is no clear and defined stakeholder engagement mechanism/framework in Tunisia for ongoing stakeholder engagement activities in relation to a project under construction or operation. Since the revolution, the environmental authority (ANPE) requests a stakeholder consultation report to be annexed to the EIA. The 2005 Decree on EIA (and not ESIA) provides general guidance on the assessment of impacts and social management plans, but does not provide any specific direction or guidance on stakeholder engagement activities.

Decree no. 328-2018 of 29 March 2018 relating to the organisation of public consultation remains also general, limited only to the methods of organising public consultation mainly with authorities and lacking consultation of local community and NGOs.

The analysis of the vulnerable population or the gender aspect is not required by the decree or related laws. There is no obligation to publish EIA reports, no deadlines for publication for public consultation unless required by donors.

3.2 Requirements for Project Financing

The IFC Performance Standards form part of their Sustainability Framework, where the "IFC Performance Standard 1" (IFC, 2012) sets out the following recommendations for stakeholder engagement:

- Stakeholder Engagement is an on-going process that may involve: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and ongoing annual reporting to Affected Communities;
- A Stakeholder Engagement Plan (SEP) will be developed and implemented that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities;
- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;
- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner that provides the Affected Communities with opportunities to express their views on project risks,

impacts and mitigation measures, and allows the client to consider and respond to them;

- The extent and degree of engagement should be commensurate with the project's risks and adverse impacts and concerns raised by Affected Communities;
- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups;
- For projects with potentially significant adverse impacts, the client will conduct an informed consultation and participation;
- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance;
- As it is considered that the Project iscategorized as a Category B project under the IFC requirements, it will be disclosed for a minimum of 30 days.

The AfDB Operational Safeguards (OSs) form part of their Integrated Safeguards System, where the "Operational Safeguard 1" states 'borrower or client shall be responsible for conducting and providing evidence of meaningful consultation'. Consultation should be based on stakeholder analysis and is preceded by disclosure of adequate project information and environmental and social information to ensure that participants are fully informed.

4.0 IDENTIFICATION OF STAKEHOLDERS

In order to define a communication process with stakeholders, several stakeholder groups that may be interested and/or affected by the Project development and implementation have been identified. There are a number of groups of people and social groups who are interested in the Project on different levels. These may be described as:

1. People and entities who will be directly or indirectly affected by the project (such as local communities) located within the Project area of Influence;
2. People and entities whom are not affected by the project development, but have the potential to influence and make decisions on implementation of the project and/or may have an interest in the Project.

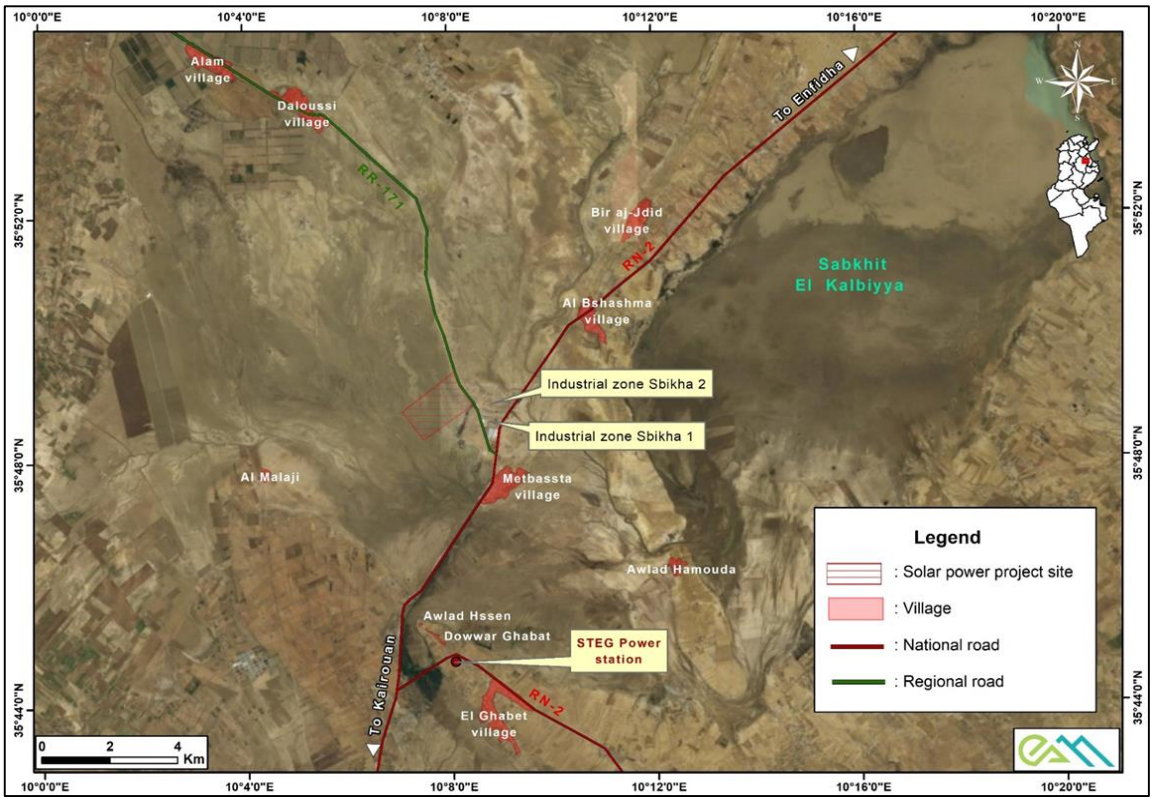


Figure 4: Location of sectors identified for local community consultation

The main groups of stakeholders identified so far are listed in Table 3. The communities are all located within 2.2 to 8.4 km from the Project site and reflect their interest in the project from local employment and community development initiatives, as well as the potential for the project to result in direct impacts from land access restrictions (linked to grazing activities) and increased community health and safety risk linked to the use of Project vehicles on the public road network. The list shall be updated and modified in the

course of the Project development and as a result of cooperation of the parties, with any new stakeholders being included in updated versions of this SEP.

Table 3. Identified Groups of Stakeholders

Identified Groups of Stakeholders			
1.Stakeholders who may be directly or indirectly affected by the Project		**Level of Stakeholder interest in**	**Involvement to the Project**
Nearby local communities	El Alam, Dalloussi, Bir Jedid, El Bechechma and Metbasta villages including Woman groups, Youth and unemployed, Land users, Representatives of educational institution, and Representatives of health facility. Landowner along the OHTL route.	- Locals have a vested interest in the Project, as they might be able to land a job opportunity - Locals could be affected by worker influx.	- Working for the project - Local large-scale contractors within the identified communities will be responsible for performing some contracting works on-site. - Responsible for providing workers with food and amenities
However, it is important to note that the project site does not include any physical land use activities, except seasonal grazing activities practiced by few herders belonging mainly to Dalloussi and Metbasta villages.			
2.Secondary Interested Parties/Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project		**Level of Stakeholder interest in**	**Involvement to the Project**
National Government and permitting authorities	General Directorate of Energy and Renewable Energies (DGEER)	Authorizes local and foreign investors to create, and sell on the electricity network. The implementation of projects for the electricity transmission. Implementation of related energy conservation programs. DGEER is entrusted to plan and implement renewable energy programs in coordination with other concerned national institutions (ANME and STEG) within the framework of its mandate.	DGEER is the authority in charge of authorizing the realisation of RE projects in Tunisia under the concession regime.
	National Agency for Energy Conservation (ANME)	ANME designs and leads energy efficiency programs and the development of renewable energies.	ANME is a member of the commission for the authorisation of the realisation of RE projects.

Identified Groups of Stakeholders			
	Tunisian Company of Electricity and Gas (STEG)	Will be of the off taker of electricity and is the entity that signed the Power Purchase Agreement (PPA) with the Developer. In addition, STEG is also responsible for designing, building and operating the associated interconnection facilities. This will include the Overhead Transmission Line (OHTL) that will connect from the Project site to the existing national grid	STEG is the partner of the Developer for the project for the following considerations: - the exclusive buyer of the produced electricity. - the responsible of the construction, operation and maintenance of the OHTL connecting the Project site to the existing national grid.
	National Environmental Protection Agency (ANPE)	The official governmental entity responsible for protection of the environment in Tunisia. The Agency is responsible for granting environmental clearance for the Project. To date, renewable energy projects in Tunisia (Solar and wind energy projects) with power less than 300 MW do not require an Environmental permit under the EIA Decree 2005-1991. Accordingly, there is no requirement for an environmental permit from the Tunisian Authorities for the proposed project	The Agency is responsible for granting environmental clearance for the Project. Taking into account that EIA Decree 2005-1991 is in process of update, the Developer might be asked for the environmental approval from the ANPE, if any.
	National Company of Exploitation and Distribution of water (SONEDE)	Its main mission is the production and distribution of drinking water over the entire Tunisian territory. It is responsible for the operation and maintenance of water collection, treatment and distribution facilities. Created by law n°68-22 of 2 July 1968, it is placed under the supervision of the Ministry of Agriculture.	SONEDE is able to meet the drinking and industrial water needs of the Project. Applications for drinking water supply are processed within two months.
	National Sanitation office (ONAS)	ONAS's main missions are the fight against sources of water pollution, the management, operation, maintenance, renewal and construction of all works destined for the sanitation of	Sanitary wastewater will be collected in a watertight pit and evacuated by vacuum tank to the ONAS station in Kairouan, or Sbikha.

Identified Groups of Stakeholders			
		cities, the responsibility for which is fixed by decree, the promotion of the distribution sector and the sale of treated water and sludge from treatment plants, the planning and implementation of sanitation projects and the development and implementation of integrated projects for the treatment of wastewater and the evacuation of rainwater.	
	National Waste Management Agency (ANGed)	ANGED works mainly to promote the quality of life of citizens and to improve environmental protection through the implementation of integrated and sustainable waste management. The agency's mission and remit also cover: -The development and strengthening of adequate infrastructure -assistance to municipalities and industrialists -The launch of collection, recycling and recovery channels -The development of an enabling framework for private sector participation and job creation.	Agreements with specialized companies approved by the minister in charge of the environment must be established by the Developer. Household and similar waste is transported to the controlled landfill of El Baten which has been in operation since 2008. The storage of hazardous waste is controlled by the ANPE.
	National Heritage Institute (INP)	In charge of Preserving, safeguarding and restoring the heritage. The INP could intervene in this project, if necessary, to collect and follow up information on discoveries related to archaeology and properties of an archaeological nature or to note and control the state of the archaeological, historical and traditional heritage.	INP will be in charge of taking all necessary measures for the conservation and will ensure, if necessary, the supervision of the work in progress, in case of accidental discoveries of remains, that the discoverer (EPC contractor) immediately informs the INP.
	General Directorate of Forestry (DGF)	Relevant to the Minister of Agriculture, Hydraulic Resources and Fisheries (MARHP), the DGF ensure the protection and management of the State's	The proximity of the project site to the IBA of El Metbasta and the need to communicate the impact assessment of

Identified Groups of Stakeholders			
		forest estate, including national parks and nature reserves. The DGF could be involved in this project through its role in the management and conservation of wetlands, Ramsar sites, IBA sites in the project area.	the project on birds and biodiversity to the DGF as well as sharing the reports of the bird fatality monitoring programme within the project site and the OHTL route during the operation phase.
Regional & Local Governmental Entities	Kairouan Governorate (governor)	Regional political authority (non-elected position). Principal leader at the regional level and representative of the governorate at the national level.	The main role of the Governor is to support the Project by providing permits needed and support on various problems which could 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 programmes. The governor is supported by the delegates of Sbikha and Kairouan Nord and the Omda of El Alam sector.
	Sbikha Delegation (delegate of Sbikha)	Delegate of Sbikha (non-elected position). Head of the delegation and representative of the delegation at regional level. It ensures the functioning of local administrative services.	
	Kairouan Nord Delegation (delegate of Kairouan nord))	Delegate of Kairouan Nord (non-elected position). Head of the delegation and representative of the delegation at regional level. It ensures the functioning of local administrative services	
	El Alam Sector (Omda of El Alam-Imada in Arabic)	The head of the El Alam sector *(Omda in Arabic)* is placed under the authority of the delegate. He is in charge of providing assistance to the various administrations, as well as than to look after the interests of the citizens.	
	Municipality of Sbikha	Mayor of Sbikha: President of Sbikha Municipal Council, responsible for business, management of municipal interests and contribution to the social, economic and cultural promotion of Sbikha	-Give permits for any construction. -Supervision of the solid waste management during the construction and operation phases. -Coordinate with them with respect to solid waste disposal through the construction contractors (In the

Identified Groups of Stakeholders			
			case of contracting with them).
	Regional District of the STEG	Representative of the Tunisian Company of Electricity and Gas (STEG) at regional level.	The Regional District of the STEG will liaise with the project and the national direction of STEG for the solar plant operation and its connection to the electric national grid.
	Regional Representative of the Ministry of Local Affairs and Environment (MALE)	In charge of supervising and monitoring environmental services of the project.	The MALE is represented regionally by the ANPE in Kairouan which is in charge of control of the implementation of the environmental management plan (EMP) by the Developer.
	Regional Commission for Agricultural Development (CRDA)	Representative of Ministry of Agriculture, Hydraulic Resources and Fisheries (MARHP) at the regional level. Provide maps of the floods in the area, water resources and hydrological maps, drilled water wells	The CRDA manages flooding and water courses streams within the projects area. Also, it is in charge of authorizing the drilling of water wells. In addition, CRDA is managing costs of grazing within the pastoral areas of the state-owned lands.
	Regional Directorate of Equipment, Housing and Territorial Development	Representative of Ministry of Equipment, Housing and Territorial Development (MEHAT) at regional level.	The Developer will need to liaise with the MEHAT for the roads to access to the project site and get authorisation for improvement, if any.
	Regional Directorate of Vocational Training and Employment	Representative of the Ministry of Vocational Training and Employment (MFPE) at regional level.	Provides project needs of skilled and non-skilled workforce.
	Deputy of the National Assembly for the Governorate of Kairouan	As a representative of the people of the Kairouan region (elected position) in the Assembly of People's Representatives (ARP) will support in promoting projects in the government of Kairouan in order to increase employability and	Support in promoting the project within the governorate of Kairouan.

Identified Groups of Stakeholders			
		decrease tension related to job creation issues within the project area.	
	Regional Directorate of the National Office for Civil Protection (ONPC)	Approving emergency response and firefighting plans for establishments/projects.	Approving emergency response and firefighting plans for the project.
Regional Unions & organisations	Regional Centre of Affairs	Helps on providing necessary services to promoters and investors for the launch or development of the project.	Support in the promotion of the project and implementation of social projects within the community development projects to be led by the Developer.
	Regional Union of Agriculture and Fisheries (URAP)	Negotiate and discuss rights and needs of farmers (e.g water well drilling, land irrigation and access, etc.) within the project area, if any.	
	Regional Agency for Promotion of Industry and Innovation (API)	Support on the promotion and the creation of the PV plant within the project area.	
	Tunisian General Labor Union (UGTT)	In charge of defending workforce rights, if needed.	
	Confederation of Corporate Citizens of Tunisia (CONECT)	Could play the role of a benchmark entrepreneurial partner for equitable and responsible economic and social development, if need	
	Tunisian Union of Industry, Commerce and Handicrafts (UTICA)	Support on the upgrading, Taxation, Financing, Regional Development, Standards, Quality, Energy for the solar plant, if needed.	
Environmental and Social NGOs	Association "Les Amis des Oiseaux" (AAO/BirdLife Tunisia)	Organizations with direct interest in the Project, and which may have useful data or insight into local issues of relevance to the Project. These organizations can also influence the views of others regarding the Project, both nationally and internationally. NGOs are responsible for sharing information with the community. They are also providing environmental services (AAO, ATPEPT and APNEK) and community Development (UNFTK).	AAO can provide reports on birds within the study area to complete with the reporting of the ornithologist to be engaged by the Developer for bird monitoring programme
	Association of Tunisia for the Protection of the Environment and Promotion of Employment (ATPEPT)		ATPEPT can help on priorities among people looking to be employed within the project.
	Association for the Protection of Nature & Environment, Kairouan (APNEK)		APNEK can provide data on the protection of the environment within the project area.

Identified Groups of Stakeholders			
	National Union of Tunisian Women, Kairouan (UNFTK)		UNFTK support on helping Women in the project are (cash aid or financing small project) within the community development programme.
Nearby industrial area	Industrial Land Agency (AFI) Sbikha Industrial Area	AFI is providing public infrastructures such as roads and sewage pipes for the total industrial area. Industrials installed within the industrial area are sharing these same infrastructures.	Partnership in managing the same facilities as road, sewage pipes,etc.

Further to the above, a preliminary stakeholder analysis is undertaken below to clarify stakeholders' interest in the Project and their ability to influence the Project's development. Accordingly, a priority contact list is identified.

High rating for priority contact list indicates importance of continuous and regular consultation and engagement. On the other hand, medium rating for priority contact list does not reduce the importance of the entity as a stakeholder but indicates that their engagement is required at specific stages or milestones of the Project (i.e. when the involvement of these entities is triggered for a specific purpose such as obtaining a specific service).

Table 4. Preliminary Stakeholder Analysis and Priority Contact List for the Project

#	Stakeholder Group	Level of Interest			Ability to Influence			Priority		
		Low	Medium	High	Low	Medium	High	Low	Medium	High
1.	**Stakeholders who may be directly or indirectly affected by the Project**									
	▪ Nearby local communities									
	▪ Herders practicing grazing activities within the general area (solar plant and OHTL) ▪ Landowners along the OHTL route									
2.	**Secondary Interested Parties/Stakeholders**									
	▪ National Government & Permitting Authorities									
	- General Directorate of Electricity and Energy Transition (DGETE)									
	- National Agency for Energy conservation (ANME)									
	- Tunisian Company of Electricity and Gas (STEG)									
	- National Governmental Protection Agency (ANPE)									
	-National Company of Exploitation and Distribution of water (SONEDE)									
	-National Sanitation office (ONAS)									

#	Stakeholder Group	Level of Interest			Ability to Influence			Priority		
		Low	Medium	High	Low	Medium	High	Low	Medium	High
	-National Waste Management Agency (ANGED)									
	- National Heritage Institute (INP)									
	- General Directorate of Forestry (DGF)									
	Regional & Local Governmental Entities									
	- The governorate authority (the governor, the delegates & the omda)									
	- Municipality of Sbikha									
	- Regional District of STEG									
	- Regional Representative of the Ministry of Local Affairs and Environment (MALE)									
	- Regional Commission for Agricultural Development (CRDA)									
	- Regional Directorate of Equipment, Housing and Territorial Development									
	- Regional Directorate of Vocational Training and Employment									
	- Deputy of the National Assembly for the									
	- Regional Directorate of the National Office for Civil Protection (ONPC)									
	▪ Regional Unions & organisations									
	▪ Non-governmental Organisations (NGOs)									
	▪ Other community members at the national level									

Colour coding	
Low	
Medium	
High	

ESIA and permits procedure

No issuance of the environmental permit for this project given that to date, renewable energy projects in Tunisia (Solar and wind energy projects) with power less than 300 MW do not require an Environmental permit under the EIA Decree 2005-1991. Accordingly, there is no requirement for an environmental permit from the Tunisian Authorities for the proposed project.

Upon addressing the above comments, an updated and Final ESIA will be prepared to be submitted to Developer for approval.

5.0 SUMMARY OF RECENT STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Stakeholders Consultation

The table below provides a summary of all stakeholders that were consulted and engaged throughout the Project during the ESIA. The table provides a summary of the stakeholder groups that were engaged, date of engagement, and the main objective and outcome.

Table 5. Summary of Recent Stakeholder Engagement Activities

Stakeholder	Phase / Entity	Method of Engagemen	Date	Objective of Consultation
Nearby local communities	ESIA / ESIA consultant	Focus group discussion	20 October 2020	In general, such entities acknowledged the importance of the Project and were much in favour of project developments and showed their willingness to support the Project as required. In addition, such entities stressed on the importance of the Project. They also emphasized on the importance of taking into account the views and concerns of local communities mainly in terms of providing job opportunities and improving road infrastructure and lightening, as well as engaging in social investment initiatives that benefit the local communities. In addition, throughout such meetings the following was investigated and discussed: ▪ Key community development needs ▪ Any gender-based violence against women. ▪ Formal and informal land use for the Project site ▪ Potential for flood risks within the Project site ▪ Infrastructure and utility within the project area ▪ Other views, issues of concern and requirements for the Project site
Farmers using the land of Project area for grazing activities	ESIA / ESIA consultant	Focus group discussion	20 October 2020	The key farmers group that are known practicing the grazing activities within the Project area include Dalloussi village. Meeting undertaken investigated and discussed the following: ▪ Land use activities and details that are undertaken in the area ▪ Obtain socio-economic information on such farmers/land users groups ▪ Other views, issues of concern and requirements for the Project site
	Governorate of Kairouan authority		27 Oct 2020	In general, the governor authority acknowledged the importance of the Project and showed their willingness to support it and facilitate different permitting and community problem solving if any. In addition to welcoming the employability of the project during construction phase for the benefit of the nearby local communities.

Stakeholder	Phase / Entity	Method of Engagemen	Date	Objective of Consultation
Regional & local governmental authorities	Key governmental /Regional authorities	Meeting		Meetings undertaken investigated and discussed the following: ▪ Any electricity supply to some developers within the Project area including the industrial area from solar energy. ▪ Support community development projects ▪ Any water-related infrastructure and utility elements in the Project area ▪ Other views, issues of concern and requirements for the Project site

In order to cover lenders' comments outlined within the Environmental and Social Due Diligence report (ESDD) conducted in October 2021 by RAMBOLL, specific consultation / focus groups with vulnerable groups (women, youth, unemployed people) were performed on 04 and 06 February 2022.

The table below includes the main results of additional consultation sessions with groups of people in the community of Metbasta which is located within the Project Area and along the OHTL route.

Table 6. Summary of Recent Stakeholder Engagement Activities during additional consultations in 2022

Stakeholder	Phase / Entity	Method of Engagement	Date and location	Objective of Consultation
Metbasta Community	ESIA / additional consultations	Focus group discussion	4 & 6 February 2022	Consulted groups expressed motivation and interest, especially in renewable energy projects. Throughout such meetings the following was investigated and discussed: (i) Profiles required for recruitment of the labour force (age range and educational level) (ii) Project lifetime; (iii) work regime adopted (permanent or temporary job); (iv) Salaries allocated to employees; (v) Becoming of those recruited at the end of construction phase; (vi) Will the project cause any adverse effects on human health; (vii) benefits to be brought to Metbasta in terms of community development. Expectations are namely: (i) Employment of local labour (ii) improvement of the local infrastructure, and (iii) development of social and community status of Metbasta.
Survey of herders currently using the land of Project area for grazing activities	ESIA / additional consultations	Individual discussion	4 February 2022	The main information provided is as follows: ▪ Grazing activities could take place during autumn, winter, and spring seasons. During the summer season (June-August), herders move to the southern area of Tunisia for grazing. ▪ Herders will move to Essaidia land in Sbikha for grazing from the Project site. ▪ Grazing fees.

Stakeholder	Phase / Entity	Method of Engagement	Date and location	Objective of Consultation
Landowners	ESIA / additional consultations	Individual discussion	6 February 2022	The landowners did not express any objection to the transmission line crossing their land.

The solar plant and the OHTL sites are potentially frequented throughout the year by 20 herders from the surrounding Dallousi and Metbasta villages (CRDA, 2022) with a livestock size ranging from 70 to 250 heads.

5.2 Disclosure Meeting

The objective of the disclosure meeting is to inform the stakeholders about the content of the ESIA and to present the results of the study in order to gather their opinions on the proposed measures. A presentation was made which includes the following sections:

1. Introduction and objectives of the ESIA disclosure meeting;
2. Description of the Project and key components of the solar plant and the OHTL;
3. Applicable standards including national, state and local regulations, IFC Performance Standards (PSs) and AfDB's Integrated Safeguards System (ISS);
4. Identification and assessment of environmental and social impacts due to the Project activities;
5. Mitigation measures for minimizing and / or offsetting adverse impacts identified;
6. Presentation and explanation of grievance mechanism.

The main concerns expressed during the disclosure meeting were:

- Technical clarifications (project lifetime) and clarification of the purchase contract with STEG;
- Compensation arrangements for land users (livestock farmers);
- Expectations in terms of employment, especially for young people, required qualifications and training;
- The contribution of the project to local development.

5.3 Socio-economic study of the PAPs

Socio-economic survey of herders

The socio-economic survey was conducted on 17/09/22 by the EAM team of 8 interviewers. It should be noted that 19 herders (95%) out of a total of 20 identified herders were consulted.

One herder was not consulted, as he refused to answer the questionnaire for fear of being followed up by the DGF (Direction Générale des Forêts) for non-payment of the royalty.

The results of the socio-economic survey are as follows:

- Adults 100 % ;
- Educational level: (i) 10% illiterate; (ii) 40% primary level; (iii) 5% secondary level; and (iv) 25% higher level
- 55% of the herders look after their livestock themselves;
- 90% of herders are married and 10% are single;
- Herders' dwellings are small to medium in size with 2 to 3 bedrooms.
- 100% of the farmers have already heard about the 100 MW solar project in Kairouan;
- The size of the herd varies between 30 and 400 heads (sheep and goats);
- 100% of the farmers are connected to the STEG and SONEDE network;
- 100% of the farmers are not connected to the sewerage network (ONAS);
- The monthly revenues of the farmers vary as follows: (i) 10% below 500 TD; (ii) 60% between 500 and 1000 TD and (iii) 30% above 1000 TD
- The income of the breeders comes from (i) 52% from livestock breeding activities; (ii) 32% from agricultural and livestock breeding activities and (iii) 16% from livestock breeding and other activities
- The percentage of persons per household is distributed as follows (i) 35% for a household consisting of 4 persons, (ii) 35% for a household consisting of 5 persons, (iii) 24% for a household consisting of 6 persons and (iv) 6% for a household consisting of more than 6 persons
- 35% of farmers use the private sector for hospitalization, compared to 65% who use public hospitals.
- Expenses related to grazing costs (for 100 heads of cattle): between 500 and 600 TD/month

Socio-economic survey for landowners

The socio-economic survey was conducted on 9/17/22 by the EAM team consisting of 8 surveyors. Eleven (11) owners were consulted, representing 50% of the number of owners identified by STEG.

According to the survey, some parcels are in the process of being sold or have already been sold to neighboring owners who are already listed. It is therefore possible that the number of owners will be revised downwards.

Harvest information (production, yield) was not provided by the owners due to their refusal to respond.

The other concerned owners are either unavailable or unreachable. The results of the socio-economic survey are as follows:

- 100% adults ;
- Educational level: (i) 20% illiterate; (ii) 20% primary level; (iii) 10% secondary level and (iii) 50% higher level
- 100% of the owners consulted are married;
- The homes of the owners consulted are small to medium sized with 2 to 3 bedrooms.
- 100% of the owners consulted have already heard about the 100 MW solar project in Kairouan;
- 100% of the owners consulted are connected to the STEG and SONEDE networks;
- 100% of the owners consulted are not connected to the sewerage system (ONAS);
- The monthly incomes of the owners consulted vary as follows: (i) 40% between 500 and 1000 TND; (ii) 10% above 1000 TND; and (iii) 50% between 2500 and 3000 TND ;
- 70% of homeowners use the private sector for hospitalization, compared to 30% who use public hospitals.
- The number of people per household is: (i) 45% between 4 and 5 people; (ii) 30% between 6 and 8 people; and 20% more than 10 people.
- 95% of the owners work their land directly with their children, only 5% use casual laborers during the harvest season (mid-December to end of January).

Vulnerable groups

Categories of people who can be classified as vulnerable

Among the categories of PAPs, particular emphasis should be placed on vulnerable groups. These are people who have fewer subsistence resources or assets than other members of the community, or who have needs that far exceed their endowment of land, financial or social capital.

Among the PAPs, the vulnerable (**the elderly,** the youngest, the disabled, **the illiterate**, those living below the poverty line, landless workers, etc.) require special care and clear identification.

During the establishment of the ARAP, the census and the social survey carried out on 17/09/2022, a careful identification of the PAPs, the type and degree of vulnerability is made.

Identification of vulnerable groups in the project

For landowners

The survey reveals that 20% (2 people) of the landowners are illiterate, 20% (2 people) are elderly (>65 years) belong to vulnerable groups.

For livestock breeders (shepherds)

The survey reveals that 10% of the cattle breeders (shepherds) are illiterate, 15% (3 shepherds) are elderly (>65 years) and belong to vulnerable groups.

6.0 FUTURE STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN AND RESPONSABILITIES

The table 7 identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project, the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations. A Project Stakeholder Register will be updated on monthly basis for the Project which serves all consultation and engagement undertaken for the Project. This shall be reviewed and updated regularly by related stakeholders. A template is provided in Annex 1 – Project Stakeholder Register Form.

In particular, it is important to note that at this point, the Developer will implement the Sustainable Corporate Strategy by developing a Corporate Social Responsibility (CSR) program considered an integral aspect of this SEP.

The CSR program will aim to allocate funds for CSR programs for the benefit the local communities to the greatest extent possible. This Program will identify priority development projects which could benefit local communities, allocated budget, timeline for implementation, etc.

Table 7. Stakeholder Engagement Activities Prior to the start of construction

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Affected communities (El Alam, Dalloussi, Bir Jedid, El Bechechma and Metbasta villages)	To inform them of the start of construction, raise awareness of the grievance mechanism, discuss local employment opportunities, and provide an opportunity for any questions to be raised before the EPS Contractor arrives at the Project site.	Public meeting in each affected community.	1 month prior to the arrival of the EPC Contractor	Developer
Women of the Affected communities (El Alam, Dalloussi, Bir Jedid, El Bechechma and Metbasta villages)	To inform them of the above, focusing specifically on the way in which women may be impacted by the Project (such as community health and safety risks from Project vehicles on the road) and to encourage women to apply for employment positions in accordance with the Local Employment Plan.	Series of women-only meetings in each community.	1 month prior to the arrival of the EPC Contractor	Developer
Vulnerable people in the affected communities (El Alam, Dalloussi, Bir Jedid, El Bechechma and Metbasta villages)	To ensure that vulnerable people are adequately informed about the Project, its risks and impacts, grievance mechanism, and provide time for questions to be raised.	A range of activities will be undertaken depending upon the vulnerability of the people. This may include, for example, sessions in schools to warn children to stay away from construction activities, visits to orphanages or other locations where vulnerable people are present.	1 month prior to the arrival of the EPC Contractor	Developer
Press and media	To provide a general update on the Project and raise awareness of the grievance mechanism	Regional press and media outlets (Radio Kairouan FM, Sabra FM and Radio El Alaa) Possibly a dedicated website during the life of the project.	1 month prior to the arrival of the EPC Contractor	Developer
	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. E-mail notification. SEP in Arabic to be disclosed on Developer website/Facebook page.	Once before construction (updated when required)	Developer
		2. Hardcopy of SEP in Arabic to be available at Kairouan Governorate and Sbikha Municipality.	Once before construction (updated when required)	Developer
		3. Summary advertisement in Arabic of grievance mechanism to be posted at key local community platforms to include	Once before construction (to be checked regularly to ensure advertisement in place)	Developer

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
		Kairouan Governorate, Sbikha Municipality, CBO's, etc.		
		4. Pictorial signs with summary advertisement in Arabic around site/fence to understand how to raise a grievance if necessary	Once before construction (to be checked regularly to ensure advertisement in place)	Developer
	Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, community integration plan, etc.).	1. Prepare leaflet in Arabic with updates on project and its environmental and social issues. This could include updates on the project's development, number of employment opportunities, the bidding process for project components, construction plans, etc. Leaflet to be disclosed at key local community platforms to include Kairouan Governorate, Sbikha Municipality, CBO's, etc.	Semi-annually during construction Annually during operation	Developer
		2. Email notification. Annual environmental report to be disclosed on Developer website.	Annually – December of each year	Developer
		3. Hardcopy of Annual environmental report in Arabic to be available at Kairouan Governorate and Sbikha Municipality.	Annually – December of each year	Developer
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project				
National Governmental Entities				
- General Directorate of Electricity and Energy Transition (DGETE) - National Agency for Energy Conservation (ANME) - Tunisian Company of Electricity and Gas (STEG) - National Environmental	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the Project.	1. Individual/Internal Meetings (if required)	Upon occurrence	Developer
		2. Correspondence and official letters (if required)		

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Protection Agency (ANPE) - National Heritage Institute (INP) - Gereral Directorate of Forestry (DGF)	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.).	1. Email notification. Annual environmental report to be disclosed on Developer website/Facebook page.	Annually – December of each year	Developer
Regional & Local Governmental Entities				
Kairouan Governorate	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	Email notification. Annual environmental report to be disclosed on company website.	Once before construction Once before operation	Developer
Sbikha Delegation				
Kairouan Nord Delegation				
Municipality of Sbikha	Coordination for the collection of solid waste from the site to the municipal approved landfill	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	Developer/EPC Contractor/ Project Operator
	Disclose information and outcomes of the Community Integration Plan – Refer to Section 6 for additional details.	1. Awareness session will be held for the local community to inform them of the Community Integration Plan. Session to be undertaken in coordination with Sbikha Municipality.	Once before construction Once before operation	Developer /EPC Contractor / Project Operator
El Alam Sector (Imada in Arabic)				
Regional Directorate of the STEG	Coordination for the connection of the solar plant to the electrical network.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	Developer/EPC Contractor/ Project Operator
Regional Representative of the Ministry of Local Affairs and Environment (MALE)	Coordination for list of private contractors approved for collection of hazardous waste from the site.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	Developer/EPC Contractor/ Project Operator
	Coordination for disposal of any damaged or broken panels.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence during operation	Developer/ Project Operator
Regional Commission for Agricultural Development (CRDA)	Coordination to secure the water requirements of the Project and to protect the existing wadi from construction materials.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence during construction	Developer/ Project Operator

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
National Company of Exploitation and Distribution of Water (SONEDE)	SONEDE network connection to provide water requirements for the Project	1. Individual/Internal Meetings (if required) 1. Correspondence and Official Letters	Upon occurrence during construction	Developer/ Project Operator
National Sanitation Office (ONAS)	Coordination to collect sanitary wastewater	2. Individual/Internal Meetings (if required) 3. Correspondence and Official Letters	Upon occurrence during construction	Developer/ Project Operator
National Waste Management Agency (ANGed)	Coordination to collect non-hazardous waste	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence during construction	Developer/ Project Operator
Regional Directorate of Equipment, Housing and Territorial Development	Submission of traffic and transport plan and discussions on outcomes and its implementation.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	Developer / EPC Contractor
Regional Directorate of Vocational Training and Employment	Coordinate for the selection of the needed jobs during construction and operation	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	Developer / EPC Contractor
Deputy of the National Assembly for the Governorate of Kairouan	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	Email notification. Annual environmental report to be disclosed on company website.	Once before construction Once before operation	Developer
Regional Directorate of the National Office for Civil Protection (ONPC)	Submission of traffic and transport plan and discussions on outcomes and its implementation.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor
Regional Unions & Organisations				
- Regional Centre of Affairs - Regional Union of Agriculture and Fisheries (URAP)	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. E-mail notification. SEP to be disclosed on Developer website/Facebook page.	Once before construction	Developer

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
- Regional Agency for Promotion of Industry and Innovation (API) - Tunisian General Labor Union (UGTT) - Confederation of Corporate Citizens of Tunisia (CONECT) - Tunisian Union of Industry, Commerce and Handicrafts (UTICA)	Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, community integration plan, etc.).	1. Email notification. Annual environmental report to be disclosed on Developer website/Facebook page.	Annually – December of each year	Developer
NGOs and nearby industrial area				
- The Association "Les Amis des Oiseaux" (AAO/BirdLife Tunisia) - Association of Tunisia for the Protection of the Environment and Promotion of Employment (ATPEPT) - Association for the Protection of Nature & Environment, Kairouan (APNEK) - National Union of Tunisian Women, Kairouan (UNFTK)	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. E-mail notification. SEP to be disclosed on Developer website/Facebook page.	Once before construction	Developer
	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.).	1. Email notification. Annual environmental report to be disclosed on Developer website/Facebook page.	Annually – December of each year	Developer
- Industrial Land Agency (AFI) - Sbikha Industrial Area	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.).	Email notification. Annual environmental report to be disclosed on Developer website/Facebook page.	Annually – December of each year	Developer

7.0 ROLES AND RESPONSIBILITIES

This section of the SEP provides an outline description of the entities responsible for stakeholder engagement and their respective roles and responsibilities, summarised in Table 8.

Table 8. Individual roles and responsibilities for stakeholder engagement activities

Entity	Responsabilities
Promoter (AMEA)	• Establishment of the steering committee • Establishment of the complaints management mechanism • Internal monitoring of resettlement operations • Negotiation and signing of compensation certificates
STEG	• Verify the land titles of the owners of the land affected by the installation of the Project • Assist in the resolution of grievances. • Take the lead in the overall implementation of the ARAP, directing other entities and stakeholders as necessary.
Project Manager	• Negotiation and signing of compensation certificates • He/she is the person who organises and conducts the different phases of the project and takes full responsibility for its management. • The project manager is involved in both the upstream and downstream phases of the project, i.e. from the development to the evaluation of the results of the managed project. He or she is often in meetings and is always up to date with the latest trends in his or her field. • His/her main tasks consist of organising and leading the project from start to finish, supervising the various phases, from the drafting of functional and technical specifications to user acceptance and even the launch of production, as well as following up with the client. • As part of this monitoring, he/she is required to check the quality of the work carried out by the project team and to ensure that deadlines and costs are met. He/she communicates a report to his/her hierarchy as well as to the client. His/her objective is to complete the project on time, within budget and in line with expectations.
Site Manager	• The site manager is responsible for the reception, supervision and maintenance of a site. With his teams, which he coordinates, he organises technical interventions. He/she may also provide technical advice to the management in order to propose the implementation of modifications that he/she deems necessary.
Social Specialist	• The Social Specialist will lead and coordinate the planning, development and implementation of social policies for projects initiated by the Promoter (AMEA Power) and the assessment and effective management of social risks related to project activities. This includes reviewing social safeguard frameworks and plans in collaboration with relevant government agencies and local beneficiary groups, processing compensation, monitoring ESMP and PARA implementation, and monitoring the project's compliance with safeguard policies throughout the project duration. • The Social Specialist will ensure compliance with the project's social risk and impact assessment in collaboration with the Environmental Specialist, in accordance with the requirements of the relevant donor

Entity	Responsabilities
	policies (AfDB and IFC) and national or, failing that, international texts, and in particular the implementation of the ESMP and RAP, all other E&S instruments prepared in the framework of this project, the commitments in the loan agreement, national regulations and ensure that contractors and sub-contractors do the same thing It is responsible for : - Monitor and audit social compliance throughout the project; - Analyse, monitor and manage the expected and unexpected social consequences, both positive and negative, of planned interventions (policies, programmes, plans, projects); - Carry out labour accommodation inspections and social audits; - Ensure proper implementation of grievance mechanisms at project level; - Engage, as appropriate, with civil society organisations and non-governmental organisations on social issues; - Support and implement social development (CSR) activities and sustainable development initiatives in line with company and project specific strategies; - With the Environmental Specialist, prepare and submit quarterly monitoring reports on the implementation of ESMP, ARAP and other E&S instruments to the AfDB. - With the Environmental Specialist, coordinate the preparation of the annual Environmental and Social Compliance Audit by an independent auditor.
Environmental Specialist	• The Environmental Specialist will lead and coordinate the planning, development and implementation of environmental policies for projects initiated by the Promoter (AMEA Power) and the assessment and effective management of environmental risks associated with project activities. • The Environmental Specialist will ensure compliance with the environmental risk and impact assessment, in accordance with the requirements of the relevant donor policies (AfDB and IFC) and national or international legislation. The Environmental Specialist will also ensure compliance with the ESMP and ARAP, all other E&S instruments prepared for the project, commitments in the loan agreement, national regulations and ensure that contractors and sub-contractors do the same. • With the Social Specialist, prepare and submit quarterly monitoring reports on the implementation of the ESMP, ARAP and other E&S instruments to the AfDB. • With the Social Specialist, coordinate the preparation of the annual Environmental and Social Compliance Audit by an independent auditor.
Community Liaison Officer	• For ARAP, the Community Liaison Officer ensures continuous communication and outreach with local communities to provide updates on the project and its progress through information channels such as public consultation, direct contact with the community via the CLO or the Promoter's local representative. • Assist in publicising the grievance mechanism, and facilitate the registration, investigation and resolution of grievances; • Provide ongoing assistance in the implementation of the ARAP • Report on the progress of the implementation of the ARAP • Provide any other assistance that may be required for the successful implementation of the project where relevant and appropriate;

Entity	Responsabilities
	• Contribute to the preparation of quarterly monitoring reports on the implementation of the project instruments (including ESMP, ARAP, PMM, CDP).

8.0 THE POTENTIAL ROLE OF NGOS AND CIVIL SOCIETY GROUPS

Prior to the start of construction activities

NGOs and civil society organisations may also have a broader level of involvement prior to the start of construction activities which includes:

- Assisting in providing information to local community residents, particularly young people and women, about the dangers of trying to enter fenced-off areas, borrow pits, quarriers, worker camps, or entering working areas for theft or other reason.
- Assisting in the design and implementation of a Community Development Plan.
- Monitoring E&S impacts in a participatory manner in accordance with the Project's ESMP.

During the construction stage

- Monitoring E&S impacts arising from the Project in a participatory manner, in accordance with the Project's ESMP.

Prior to the start of operations

- Assisting in the implementation of a road safety campaign that aims to warn people, particularly young people and women, of road safety risks during operations.
- Monitoring E&S impacts arising from the Project in a participatory manner in accordance with the Project's ESMP.

During operations

- Assisting in the implementation of site restoration and revegetation activities.
- Monitoring E&S impacts arising from the Project in a participatory manner in accordance with the Project's ESMP.

ESIA and Supporting Documents Information Disclosure

It is of utmost necessity to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

The disclosure package will include the following key documents that are available publicly in Arabic and English language.

- Environmental and Social Impact Assessment (ESIA) for the solar plant
- Environmental and Social Impact Assessment (EIA) for the associated Overhead Transmission Line (OHTL)

- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)
- Abreviated Resettlement Action Plan (ARAP)
- Environmental, Health, Safety and Social (EHSS) Management System Manual
- Environmental and Social Management Plan (ESMP)
- The above documents are available at the following avenues:
- IFC website (www.ifc.org)
- Developer Website (https://www.ameapower.com). The documentation above will remain at the website for the life of the project.
- Hard copies available at the governorate of Kairouan and the municipality of Sbikha:

✓ **Kairouan Governorate**

Location : Avenue de l'Environnement 3100, Kairouan, Tunisie

Tel: (+216) 77 226 777

Fax: (+216) 77 228 450

E-mail Address: gouv.gouvkairouan@planet.tn

✓ **Sbikha Municipality**

Location : Rue 18 Janvier 1952 Sbikha, Kairouan, Tunisie

Tel: (+216) 77 365 517

Fax: (+216) 77 365 517

E-mail Address: contact@commune-sbikha.gov.tn

Web-site: www.commune-sbikha.gov.tn

- Soft copies can also be made available to stakeholders via email to donia.mejri@ameapower.com.

To communicate the outcomes of the above process, instead of using a public disclosure session (due to the ongoing COVID-19 situation), alternative methods will be utilized to communicate with stakeholders.

An advertisement will be taken out in the national newspaper about the project, the availability of the disclosure package and the details about an upcoming disclosure event. The same will be done on the Project's website and LinkedIn. In addition, corresponding leaflets will be distributed in Kairouan amongst the key stakeholders in the city, its Military Authorities, Governmental Institutions and the municipality.

The disclosure event will likely take the form of a Facebook Live event. A link and invite to this event will also be provided on the official page for Kairouan city on Facebook. The event will also include a Q&A session. The whole event will be recorded and a summary report on the event and the Q&A session will be made available.

Finally, it is important to note that all stakeholder can raise concerns or comments via the grievance mechanism provided in “Chapter 10” below.

The disclosure of the project information as identified above will be the responsibility of the CSR Manager of the Developer.

The ESIA, NTS, ESMP and SEP will be disclosed for a minimum 30-day disclosure period. As per the AfDB’s disclosure requirement, the Developer should grant the Bank the formal written to authorization to disclosure all ESA documents at least 30 days prior to its board approval date.

9.0 MONITORING AND REPORTING PROCESS

The monitoring and documentation of SEP activities will be the responsibility of the CSR Manager (whom will also act as the CLO) and HSSE Manager to cascade messages from engagements with national and regional stakeholders, and this specific responsibility will include:

- Agreed SEP key performance indicators and metrics.
- Monitoring ongoing engagement and consultation activities.
- Tracking potential risks and issues.
- Confirming consultation documentation is up to date and accessible.
- Regularly assessing the effectiveness of engagement and consultation methods.
- Adjusting the ongoing plan according to the updates along with the rules, procedures and restrictions.
- Updating the SEP annually to ensure that it remains aligned with the Project's objectives.

9.1 Monitoring

To ensure that the stakeholder engagement process, including the disclosure and consultation efforts, is implemented in a meaningful and continuous way, a monitoring, analysis and reporting process will be followed and supervised by the Developer during both Construction and Operation phases.

Developer shall prepare a quarterly SEP Implementation Plan for all stakeholder engagement activities, which should indicate:

- Groups to be engaged
- Objective of engagement
- Method of engagement and main information to share with them

Having prepared the quarterly plan and implementing the planned activities, all information related to stakeholder engagement should be available summarized and reported to the lender.

9.2 Reporting

During Construction and Operation phases, the detailed engagement schedule will be reviewed biweekly as per the feedback received from the stakeholders.

A summary of key stakeholder engagement activities will be included in the overall project update report which will be issued on a monthly basis as part of the Construction and Operation monthly reporting obligations.

10.0 STAKEHOLDER GRIEVANCE MECHANISM

10.1 Introduction and scope

The purpose of this document is to describe the grievance mechanism that shall be used to receive and facilitate the resolution of grievances during completion of the ongoing Environmental and Social Impact Assessment (ESIA).

The scope of the grievance mechanism covers the ESIA which is being prepared for Metbasta solar farm project in Kairouan. The Grievance Mechanism is designed to be used in response to the actions of the Developer and their sub-contractors, suppliers and workforce.

The grievance mechanism aims to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, at no cost and without retribution to the group/individual that has raised the grievance. The mechanism has been designed so that it does not impede access to any future judicial, or other type of administrative process, and includes provisions to ensure that details of the grievance and person(s) raising the grievance are kept confidential.

10.2 Disclosure

Information associated with the content of the grievance mechanism, and how a concern can be raised to the Developer, shall be disclosed in the following ways during the ESIA:

- Using printed information which is included in the Project Information Leaflet;
- Using the Grievance Mechanism leaflet (see Annex 2);
- Including the details in ESIA Screening and Scoping PowerPoint files delivered during formal workshops and presentations; and
- By verbally mentioning the Grievance mechanism during stakeholder engagement activities.

10.3 Recording and logging grievances

Any group/individual can raise a grievance to the Developer. All complaints shall be considered and acknowledged as opportunity of improvement or recommendation.

A complaint can be raised by sending an email to the Developer Social Specialist donia.mejri@ameapower.com

Following contact with the Developer representative, the grievance shall be recorded using the electronic grievance log and paper record form, noting the following information:

- The individual (or group representative) complaint's name (as long as the person wishes to disclose his/her name), 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 complaint 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 wish 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 staff have 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.

The grievance mechanism includes precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a complaint, as well as an option to submit anonymous grievances.

The grievance mechanism provides a feedback-system to inform and update the claimant on the handling of his/her complaint. Responses to anonymous complaints will be posted on Project's public channels (web site, social media, and handouts at CLO office).

10.4 Grievance investigation and attempt at resolution

After a new grievance has been recorded, the Developer shall acknowledge receipt of the grievance within 2 calendar days. 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 Community Liaison Officer, shall take responsibility to discuss the grievance with other member of the Developer's staff and other parties, where relevant, and propose a resolution response.

The Devloper's Community Liaison Officer 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 calendar days.

The Developer's Community Liaison Officer 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 Developer's Community Liaison Officer 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 the paper record form indicating that they are satisfied with the response. If they are not satisfied, then they have the choice to appeal the decision (see section 10.5 below).

Furthermore, the Grievance Mechanism should include details of the way in which a sexual exploitation, abuse and sexual harassment (SEAH) and gender-based violence (GBV) will be handled. Thus, an effective sexual harassment complaints procedure will be implemented aiming to:

- conveys the message that the Developer takes all cases of harassment seriously and is able to prevent harassment;
- enables the complainant to report harassment to a female person/ manager;
- ensures that complaints are dealt with consistently and within a specified period of time
- alerts to patterns of unacceptable conduct;
- highlights the need for prevention strategies.

All complaints and concerns related to SEAH and GBV to be treated seriously and in an impartial and confidential way. As well, if female raises such an issue, then it must be kept confidential and not released.

Effective channels for reporting, including an anonymous option, can help encourage communities to report complaints or concerns. Details of the grievance shall be kept on a secure computer, paper records locked, etc.

10.5 The choice to launch an appeal

If the individual/group raising a grievance is not satisfied with the initial response and wishes to continue the compliant, they have the choice to launch an appeal.

An appeal procedure will be implemented and putted in place by the complaint resolution committee to be used in the event that an appeal is made (where the person raising the issue does not accept the proposed response). In order to help ensure an objective and transparent appeal process, this committee will comprise a multi-stakeholder group of people (community leaders, CLO, etc.) which essentially would meet to hear the appeal and decide compensation. A representative of an NGO and a consultant may be included as well to give advice. In addition, the committee will be gender balanced (male and female staff member) to be available to receive and process grievances, so that individual/group raising a grievance can choose to whom they wish to speak.

The target date for resolving appeals is a further 15 calendar days, starting with the date the initial response was sent by the Developer.

In the event that the claimant does not accept the recommended solution from the second review, the case (including all the documents connected with the grievance) shall be passed back to the claimant so that they are free to pursue a legal or other form of administrative process.

NOTE: *if the individual/group raising a grievance wishes to seek a judicial resolution before the final decision of the Developer's final decision is made through the appeal process, 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.*

10.6 Supporting documents

The following supporting documents/files accompany this Grievance Mechanism:

- grievance log; and (see Annex 3).
- Record grievance form (see Annex 4).

Grievances will be recorded in a formal logging system for which the CLO will be responsible. The grievance log will be separate from a stakeholder log which details interactions with communities and stakeholders. People may register grievances using the Record grievance form, or by contacting the CLO directly. Contact details for the CLO will be included in appropriate project communication materials such as the NTS.

The CLO will classify grievances according to risk:

The classification of the complaint depends on its complexity and cost:

- **Level 1: Minor social incident or minimum priority complaint:** a local, isolated and single complaint that could be handled with limited effort. Usually it is generated and motivated by individual interests.
- **Level 2: Medium social incident or medium priority complaint:** widespread and/or continuous complaints. This is a generalised complaint, probably affecting several individuals or groups. It is likely, if left unaddressed, to escalate into a major social incident (for example, noise, vibration and dust during construction).
- **Level 3: Major Social Incident or Critical Priority Complaint:** Potential for significant violation of applicable legislation, international standards, company policies and/or negative media attention, safety and security of the project site, employees and stakeholders (e.g. abuse by security forces).

The CLO will explain to the complainant in writing (or where literacy is an issue, orally) the grievance review process, the investigation results, any changes to activities that will be undertaken to address the grievance, and how the issue is being managed to meet the project's commitments and environmental and social management system.

In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions.

Below is the Complaints Management Mechanism Scheme :

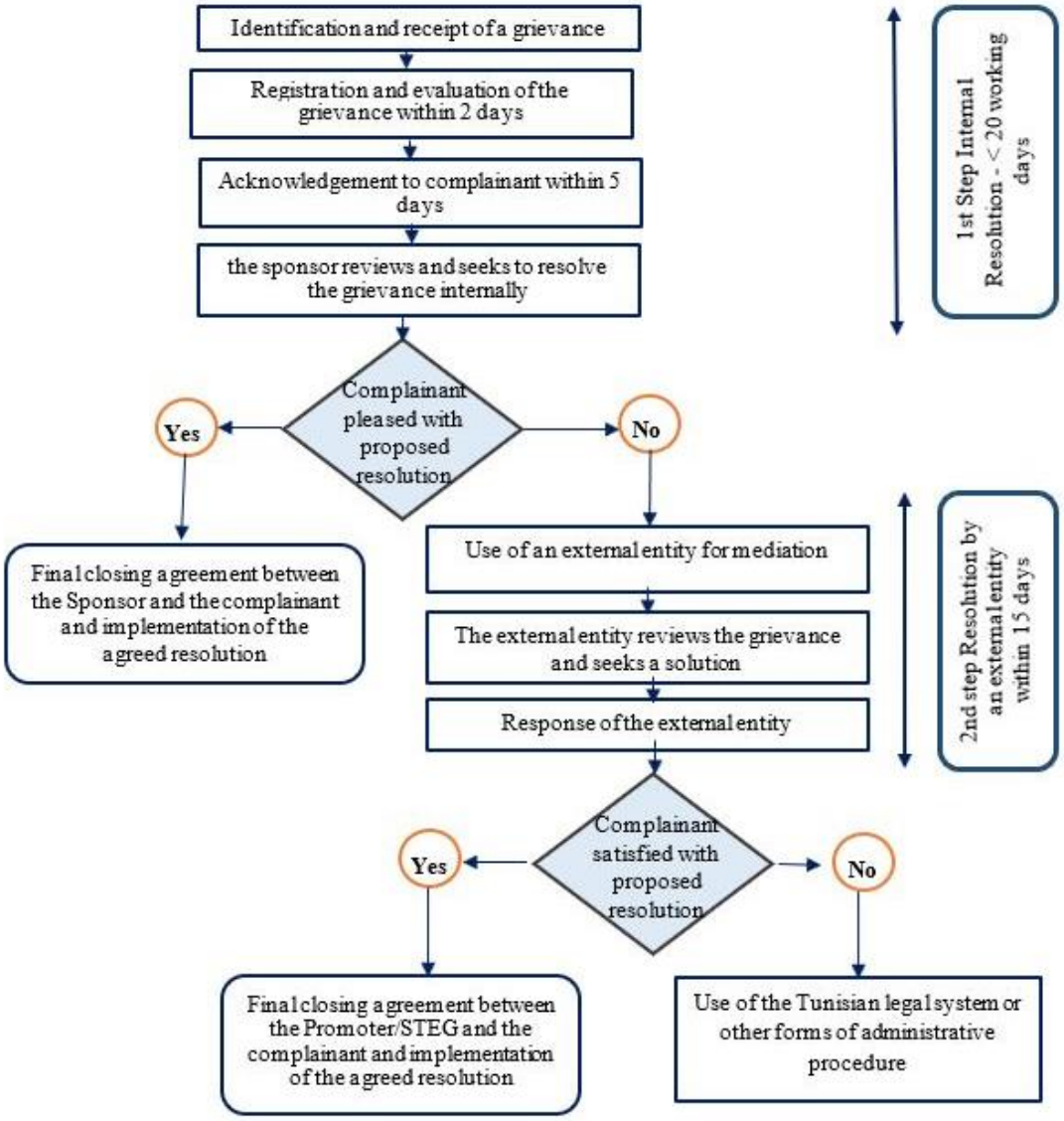


Figure 5: *GMP flow chart*

10.7 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 use of road vehicles, engagement organisation, etc.) shall be monitored;

- ✓ **Gender –** the gender of individuals raising grievances shall be recorded and reported separately;
- ✓ **Community –** the name of the individual/group/community are resident in shall be recorded;
- ✓ **Resolution time -** the target for the resolution of grievances is 15 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 15 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 ESIA working procedures and broader stakeholder engagement activities, with the objective of demonstrating continual improvement.

ANNEXES

Annex 1: Project Stakeholder Register Form

Annex 2: Grievance Leaflet

Annex 3: Grievance Log

Annex 4: Record Grievance Form