



Land Acquisition and Resettlement Framework

**120 MWp Solar Photovoltaic (PV) plant and 225 kV overhead transmission line 12 km long in Mazzouna, Sidi Bouzid Tunisia
Greenfield: Sidi Bouzid 2**

REPORT: **Land Acquisition and Resettlement Framework (LARF)
120 MWp Solar Photovoltaic (PV) plant and 225 kV overhead
transmission line (OHTL) – in Mezzouna, Sidi Bouzid - Tunisia**

PREPARED BY: Social specialist: Stuart HUME
GIS expert: Asma DOUZI
Engineers and environmentalists: Insaf CHRIKI, Khouloud
MAALAOUI and Amal ARFAOUI.

CONTROLLED BY: Project director: Tahar KHOUAJA

VALIDATED BY: EAM General Manager and Environmental & Social Specialist:
Raja KHOUAJA

VERIFIED BY: EBRD, EIB and SCATEC

REPORT REVISION		
DATE	VERSION	REFERENCE
September 4 th , 2025	00	Draft report
October 8 th , 2025	01	Updated after comments
October 16 th , 2025	02	Final report

Table of Contents

1	Executive Summary	10
1.1	<i>SCOPE AND CONTENTS OF THIS FRAMEWORK</i>	12
2	Project Description and Potential Project Impacts	14
2.1	<i>PROJECT OBJECTIVES</i>	14
2.2	<i>PROJECT LOCATION, KEY PROJECT COMPONENTS, AND SOCIO-ECONOMIC CONTEXT</i>	14
2.3	<i>KEY PROJECT COMPONENTS</i>	20
2.4	<i>LITERACY AND GENDER DYNAMICS OF LAND OWNERSHIP AND USE</i>	21
2.5	<i>PROJECT POTENTIAL FOOTPRINT AND ASSOCIATED LAND IMPACTS</i>	22
2.6	<i>COMMITMENT TO AVOIDANCE AND MINIMISATION OF DISPLACEMENT IN FURTHER PROJECT DEVELOPMENT</i>	22
3	Legal and Policy Framework	26
3.1	<i>LEGAL FRAMEWORK</i>	26
3.2	<i>EBRD PERFORMANCE REQUIREMENTS</i>	28
3.3	<i>GAP ANALYSIS</i>	31
4	PRINCIPLES, OBJECTIVES, AND PROCESSES	46
4.1	<i>RESETTLEMENT PRINCIPLES AND COMMITMENTS</i>	46
4.2	<i>PROCESS OVERVIEW</i>	47
5	TENTATIVE RESETTLEMENT AND COMPENSATION STRATEGY	49
5.1	<i>FIRST APPROACH TO ENTITLEMENTS</i>	49
5.2	<i>VALUATION OF AFFECTED ASSETS</i>	50
5.3	<i>CASH AND IN-KIND COMPENSATION</i>	50
6	Livelihood Restoration and Improvement	52
6.1	<i>PRINCIPLES</i>	52
6.2	<i>RESTORATION AND IMPROVEMENT OF LAND-BASED LIVELIHOODS</i>	52
6.3	<i>TRAINING</i>	52
6.4	<i>SPECIFIC ASPECTS RELATED TO GENDER</i>	52
6.5	<i>SPECIFIC ASPECTS RELATED TO VULNERABILITY</i>	52
6.6	<i>PARTNERSHIPS AND LINKAGES FOR PLANNING AND IMPLEMENTATION OF LIVELIHOOD RESTORATION AND IMPROVEMENT</i>	53
7	Consultation and Disclosure	54
7.1	<i>MAIN RESULTS OF CONSULTATION CARRIED OUT FOR PREPARING THE RESETTLEMENT FRAMEWORK</i>	54
7.2	<i>ENGAGEMENT PLAN FOR FURTHER STAGES AND DISCLOSURE</i>	56
7.3	<i>CONFIDENTIALITY ARRANGEMENTS</i>	56

8	Grievance Management and Redress System	58
8.1	<i>KEY PRINCIPLES.....</i>	58
9	Vulnerable People	63
9.1	<i>VULNERABILITY ANALYSIS.....</i>	63
9.2	<i>POTENTIAL ACTIVITIES IN ASSISTANCE TO VULNERABLE PEOPLE</i>	64
10	Monitoring and Evaluation.....	65
10.1	<i>INDICATORS, INCLUDING KEY PERFORMANCE INDICATORS</i>	65
10.2	<i>REPORTING.....</i>	66
11	Implementation Responsibilities and Funding	67
11.1	<i>BUDGET AND ARRANGEMENTS FOR FUNDING</i>	68
11.2	<i>TIME SCHEDULE.....</i>	69
11.3	<i>CHANGE MANAGEMENT.....</i>	69

List of Figures

Figure 1	- Project location map.....	10
Figure 2	– Project location map	14
Figure 3	- Vicinity of the Solar PV site	15
Figure 4	- Land parcel map of the PV solar plant.....	16
Figure 5	- Land use along the OHTL route.....	18
Figure 6	- Position of 31 pylons along the 12 km of the OHTL	18
Figure 7	- Layout plan for the solar PV plant	20
Figure 8	- Scattered dwelling within 2 km of the PV Project and access road	23

List of tables

Table 1 -	Land Titles of the PV Plant	15
Table 2 -	Gap Assessment of EBRD EPR5 and Tunisian Laws and Regulations	32
Table 3 -	Gap Assessment of EIB's ESS6 and Tunisian Laws and Regulations	39
Table 4 -	Proposed entitlements matrix	49
Table 5 -	Preliminary vulnerability criteria and justification	63
Table 6 -	Monitoring and evaluation indicators	65
Table 7 -	Profile of state agencies involved in resettlement	67

TABLE OF ACRONYMS

Term	Definition and Comments
AC	Alternating Current
AFA	Agricultural Land Agency
AOT	Authorisation for Temporary Occupation
CET	Land Assessment Commission
CRDA	Regional Commissariat for Agricultural Development
CLO	Community Liaison Officer
DC	Direct Current
DGF	National Department of Forests
EAM	Environmental Assessment & Management
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIB	European Investment Bank
EPC	Engineering, Procurement, and Construction contractor
ESAP	Environmental and Social Action Plan
ESR	Environmental and Social Requirements
ESMS	Environmental and Social Management System
E&S	Environmental & Social
FGD	Focus Group Discussions
GBV	Gender Based Violence
GIS	Geographical Information System
INS	Tunisian National Institute of Statistics
KPI	Key Performance Indicators
LARF	Land Acquisition and Resettlement Framework
LALRP	Land Acquisition and Livelihood Restoration Plan
MIME	Ministry of Industry, Energy and Mining
MW	Mega Watt
MWp	Mega Watt Peak
NOC	No Objection Certificate
NTS	Non-Technical Summary
OHTL	Overhead Transmission lines
OTC	Office of Topography and Cartograph
PAHs	Project Affected Households
PAPs	Project Affected Persons
PR	Performance Requirement
PPA	Power Purchase Agreement
PV	Photo Voltaic
RF	Resettlement Framework
RoW	Rights-of-Way
RR	Regional Road
SEP	Stakeholder Engagement Plan
STEG	Tunisian Company of Electricity and Gas
TND	Tunisian Dinar
ToR	Terms of Reference

GLOSSARY OF TERMS

Term	Definition and Comments
Adequate housing	This refers to adequate privacy; space; physical accessibility; security; security of tenure; structural stability and durability; lighting, heating and ventilation; basic infrastructure, such as water-supply, sanitation and waste-management facilities; suitable environmental quality and health-related factors; and adequate and accessible location with regard to work and basic facilities.
Affected community	This refers to a community affected by the project as defined under EPR 1 and EIB ESS1 whose members are experiencing physical or economic displacement. Affected communities include host communities.
Affected person	This refers to a legal or natural person experiencing either physical or economic displacement as a result of project-related restrictions on land use, other assets or natural resources.
Businesses	This includes shops, restaurants, services, manufacturing facilities and other enterprises, regardless of size and whether licensed or unlicensed.
Compensation	This refers to payment in cash or in kind for loss of land, other assets or natural resource and access thereto, that are acquired or affected by the project.
Completion audit	This refers to an internal audit of resettlement activities undertaken after the activities defined in the Land Acquisition and Livelihood Restoration Plan have been completed to determine whether requirements in EPR 5 and EIB ESS6 and provisions in the Land Acquisition and Livelihood Restoration Plan have been met, particularly those pertaining to livelihood improvement or restoration.
Cut-off date for eligibility	This is the date established and disclosed, usually after completion of the census of affected project affected persons, after which no further displaced persons or assets shall be identified.
Economic displacement	The involuntary loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources or other means of livelihood.
External compliance review	This refers to periodic external reviews of the implementation of resettlement activities to determine whether requirements in EPR 5 and EIB ESS6 and provisions in the Land Acquisition and Livelihood Restoration Plan are being met. These reviews occur prior to a Completion audit (see above).
Forced eviction	The permanent or temporary removal, against their will, of individuals, families, and/or communities from the homes and/or lands which they occupy
Full replacement cost	The method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety.
Household	One person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area. A household can consist of a single family, more than one family or no families in the case of a group of unrelated people.
Inventory	A list of the assets and asset-related rights of displaced persons and affected communities
Land rights	This includes full and permanent ownership rights recognised by the law of the country, whether registered or customary; permanent or temporary usufruct (usage) rights derived from a formal or informal agreement or from custom, including long- or short-term lease, tenancy and sharecropping as well as formal or informal use of communally held natural resources such as forest, pasture, and water bodies; rights-of-way established by law or custom; and restrictions of use or access established by law or custom.

Term	Definition and Comments
Livelihood	This refers to the full range of means that individuals, households and communities utilise to make a living, such as wages from employment; cash income earned through an enterprise or through sale of produce, goods, handicrafts or services; rental income from land or premises; income from a harvest or animal husbandry, share of a harvest (such as various sharecropping arrangements) or livestock production; self-produced goods or produce used for exchange or barter; subsistence goods or produce; food, materials, fuel and goods for personal or household use or trade derived from natural or common resources; pensions and various types of government allowances.
Economic restoration and standard of living improvement measures	This refers to the range of measures that will be implemented with the aim of restoring and, where possible, improving, the economic conditions and standards of living of displaced persons in the shortest time possible.
Physical displacement	The involuntary relocation of a person or persons caused by a loss of land or shelter, or loss of access to land.
Involuntary resettlement	Involuntary resettlement refers to impacts of project-related land acquisition, including restrictions on land use and access to assets and natural resources, which may cause physical displacement (relocation, loss of land or shelter), and/ or economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources or other means of livelihood), as well as the processes to mitigate and compensate these impacts.
Property	Buildings, land plots, or both together, including all fixed assets attached to the buildings and/or land such as trees and ancillary structures owned or used by a displaced person.
Resettlement assistance	Technical and financial assistance provided to displaced persons in addition to compensation to support their efforts in either relocating to a new home and/or restoring their livelihoods.
Restrictions on land use	This refers to limitations or prohibitions on the use of agricultural, residential, industrial/commercial or other land types that are directly introduced and put into effect as part of the Project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.
Security of tenure	Legally recognised rights to land/occupancy which protects occupiers, to the maximum extent possible, from forced evictions after relocation to a new residential site.
Squatters	Persons whose occupation of land is recognised neither by formal and/or customary law, which may for example include opportunistic settlers that move into an area after it has been lawfully declared prohibited for settlement.
Transition period	Period between the occurrence of the displacement and the time when relocation has been completed and/or affected livelihoods restored.
Transitional support	Provision of financial or other types of support to displaced persons during the transition period.
Uneconomic parcels of land	Outcome of land access restrictions which results in very small sections of land remaining which are not economically viable.
Vulnerable Groups	This refers to people or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their skin colour, natal sex, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy status, political views, or social status. Vulnerable individuals and/or groups may also include people living below the poverty line, the landless, single-headed households, communities dependent on specific natural resources, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or international law or other types of socio-economic status.

1 EXECUTIVE SUMMARY

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.

SCATEC (hereafter referred to as "the Developer"), was awarded in December 2024, the development of a 120 Mega Watt (MWp) Photo Voltaic (PV) Solar power plant in the governorate of Sidi Bouzid hereafter referred to as "the Project" or 'PV Plant Sidi Bouzid 2'. Scatec was selected after an international competitive call of tenders launched by the Government of Tunisia under the reference AO-01-2022, represented by the Ministry of Industry, Energy and Mines (MIME). On 24 March 2025, Scatec signed a concession agreement with the Ministry of Industry, Energy and Mines a 25-year power purchase agreement (PPA) with the Tunisian Company of Electricity and Gas (STEG).

STEG will operate the OHTL after it is constructed by SCATEC. The location of the Project is illustrated in Figure 1.

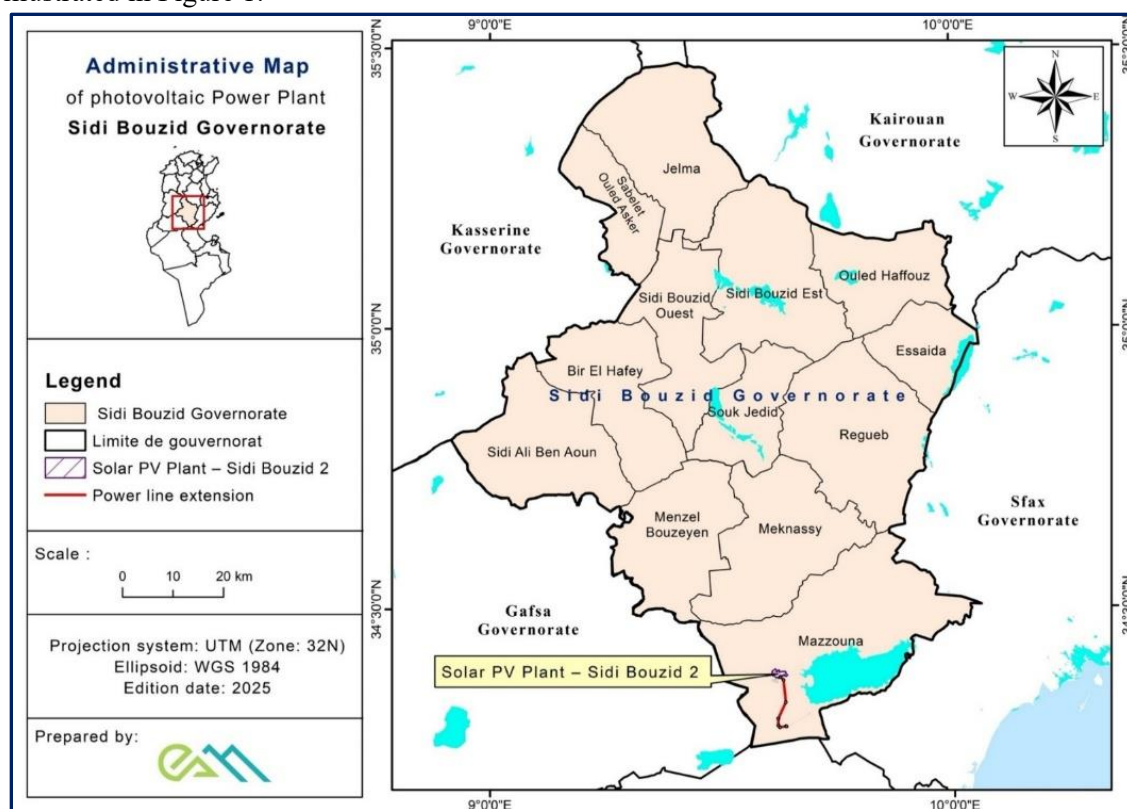


Figure 1 - Project location map

This Land Acquisition and Resettlement Framework (LARF) reflects the combined requirements from national legislation, the Environmental and Social Policy (2024) of the European Bank for Reconstruction and Development (EBRD) and the Environmental and Social Standard 6 of the European Investment Bank (EIB). The content of the LARF will be subsequently used to develop and implement a Land Acquisition and Livelihood Restoration Plan (LALRP) once the final locations of the OHTL pylons and the displaced persons become known. Due to the fact that the location of the OHTL pylons are not yet known, a Resettlement Framework has been prepared rather than the LALRP.

The PV Solar site is located on privately owned land and covers 13 land title records, owned by 10 landowners as some of the landowners own more than a single land plot. A ‘Promise to Lease Agreement’ were voluntarily signed on April 2023 and June 2025 between the 10 landowners and the Developer for its exclusive availability to the Developer. The land required for the Solar PV site has been obtained on a “*willing lease, willing lessor*” basis as SCATEC for a period of 25 years, as a private company, do not have the legal right to force (expropriate) the landowners to allow their land to be used for the solar PV site.

The 12 km OHTL will be installed by the Developer to connect the solar arrays to the National Grid through the Mezzouna 1 STEG Substation under construction by STEG. The OHTL intersects approximately 19 privately owned land plots with the remaining intersecting state-owned land. Approximately 4% of the land intersected by the OHTL is used for agricultural activities (land used for fruit growing almond and olive trees) with the rest being land used for grazing livestock. The land to be used for the OHTL pylons will be secured through negotiation with the private landowners based on estimation conducted by a certified land expert (permanent land use without acquisition, with one-time compensation). No agreement is required for the private land plots directly below the OHTL wires, unless trees/vegetation must be removed to ensure safe separation distances in which case then a compensation agreement will be prepared.

Following the publication of the ministerial decree authorizing STEG to construct the high-voltage transmission line in the Official Gazette of the Republic of Tunisia (JORT), the necessary administrative procedures for land access will be implemented.

A detailed review of applicable national legislation has been undertaken and the key differences with EBRD/EIB policy safeguards, and the steps taken to address these differences, has been defined.

Potential project impacts are expected to arise from the following:

- Involuntary access restrictions imposed to informal land users grazing livestock within the Solar PV Park, where a land plot is known to be used by a single herder who is supported by 2 workers.
- Land use change arising from the installation of the OHTL pylons and connecting access roads, which could impact formal and informal land users. A (different) herder is known to use land for informal grazing at the southern area of the OHTL.
- Where involuntary height restrictions are imposed to land users below the OHTL wires due to national minimum distances required between the wires and tall vegetation, this vegetation must be either removed (if it exists now) and must not also be grown tall in the future. This may reduce the type of trees and production of agricultural/forestry products in the future, leading to a potential loss of income.
- Unexpected damage to trees and vegetation that occurs during the OHTL stringing process.

The resettlement principles are defined in the LARF which also includes an indicate eligibility and entitlement framework. The displaced persons are eligible for compensation for the loss of assets at full replacement cost and livelihood restoration measures. Based upon the information available, there is a single herder using land informally inside the Solar PV Site supported by 2 workers and 19 private landowners who may be impacted from the installation of a pylon. The livelihood restoration measures will be defined using an engagement-led approach during development of the LALRP. A range of measures will be specifically designed to assist the livelihoods of adult females in displaced households, and additional measures will be designed for vulnerable people in displaced households.

The LARF outlines potential impacts associated with land leasing. However, actual impacts will only be confirmed through stakeholder engagement activities such as consultations, socio-economic surveys, and site visits. Any compensation referenced in this report will only apply if the anticipated impacts are verified through these processes. Additionally, further livelihood restoration activities may be included in the Community Development Plan, based on evolving needs and findings during implementation.

The LARF includes details of a grievance mechanism, and monitoring and evaluation indicators which include both leading and lagging indices. Given the very small number of displaced persons, it is likely that development of the LALRP will take 2-3 months to prepare and implement. When SCATEC consider that the objectives of the Plan have been achieved, an internal Completion Audit will be conducted to verify that all actions have been completed and, where additional actions are identified, these will be placed into a Corrective Action Plan.

The following consultations were undertaken during development of the LARF:

- x10 engagements with the landowners who own land to be used for the Solar PV Site;
- The single herder using land within the Solar PV Site;
- A telephone call with the Omda (community leader) of Khobna; and
- A telephone call with the representative of OTC (*Office de la Topographie et du Cadastre* - government cadastral office) for Sidi Bouzid.
- x6 engagements with the landowners who own land along the OHTL.

1.1 SCOPE AND CONTENTS OF THIS FRAMEWORK

To date, the following documents have been prepared:

- Environmental and Social Screening Report;
- Environmental and Social Assessment Report (ESAR) and a Non-Technical Summary (NTS);
- Stakeholder Engagement Plan (SEP); and
- Environmental and Social Action Plan (ESAP).

The scope of the LARF covers the Project's land requirements, both temporary during construction including the land requirements of the EPC Contractor and during operations. At this time, the location of the OHTL pylons have been provisionally identified by SCATEC and details of their locations are included in the LARF. Using the LARF as a basis, a LALRP shall be prepared which shall be developed and implemented by SCATEC. The LALRP will include details of the final pylon locations.

The contents of the LARF are summarised below:

- Section 1 – Executive Summary
- Section 2 – Project Description and Potential Project Impacts
- Section 3 – Legal and Policy Framework
- Section 4 – Principles, Objectives, and Processes
- Section 5 – Tentative Resettlement and Compensation Strategy
- Section 6 – Livelihood Restoration and Improvement
- Section 7 – Consultation and Disclosure

Section 8 – Grievance Management and Redress System

Section 9 – Vulnerable People

Section 10 – Monitoring and Evaluation

Section 11 – Implementation Responsibilities and Funding

2 PROJECT DESCRIPTION AND POTENTIAL PROJECT IMPACTS

2.1 PROJECT OBJECTIVES

The project objective is to work towards Tunisia's energy transition strategy by constructing 120 MWp of renewable solar capacity using SCATEC as the developer. The physical footprint of the Solar PV Park where the permitter fence covers an area of 305 ha.

1.2 PROJECT LOCATION, KEY PROJECT COMPONENTS, AND SOCIO-ECONOMIC CONTEXT

Tunisia is divided into 24 Governorates which are subdivided into 264 delegations, further subdivided into sectors (imadats). The Project site is located in Khobna Sector within the delegation of Mezzouna in the Governorate of Sidi Bouzid. The nearest community to the Solar PV site is Khobna 4 km South-East which has a population of approximately 3,000.

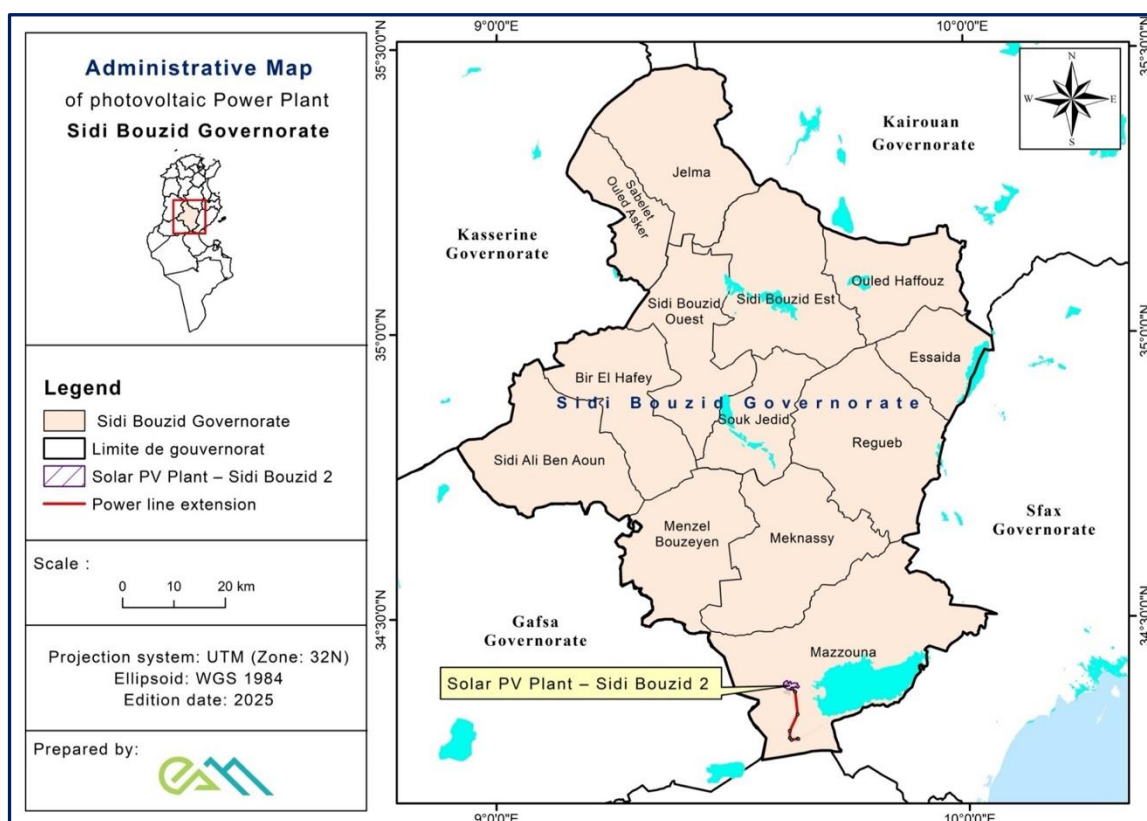


Figure 2 – Project location map

The Solar PV site is generally flat, accessible from the nearby road of RR124, with an altitude between 60 to 80 m. The land was historically used for agriculture and there is recent evidence of land use for grazing activities. Inside the Solar PV site perimeter, there are several ruins of old buildings in very poor condition and a traditional “Majel” type rainwater reservoir. In addition, abandoned wells dating back to colonial times and a disused cemetery have also been identified near the solar PV site.

Nearby land users along the boundary of the Solar PV site comprises scattered residential dwellings (farms) and Khobna community to the southwest as illustrated in Figure 3.

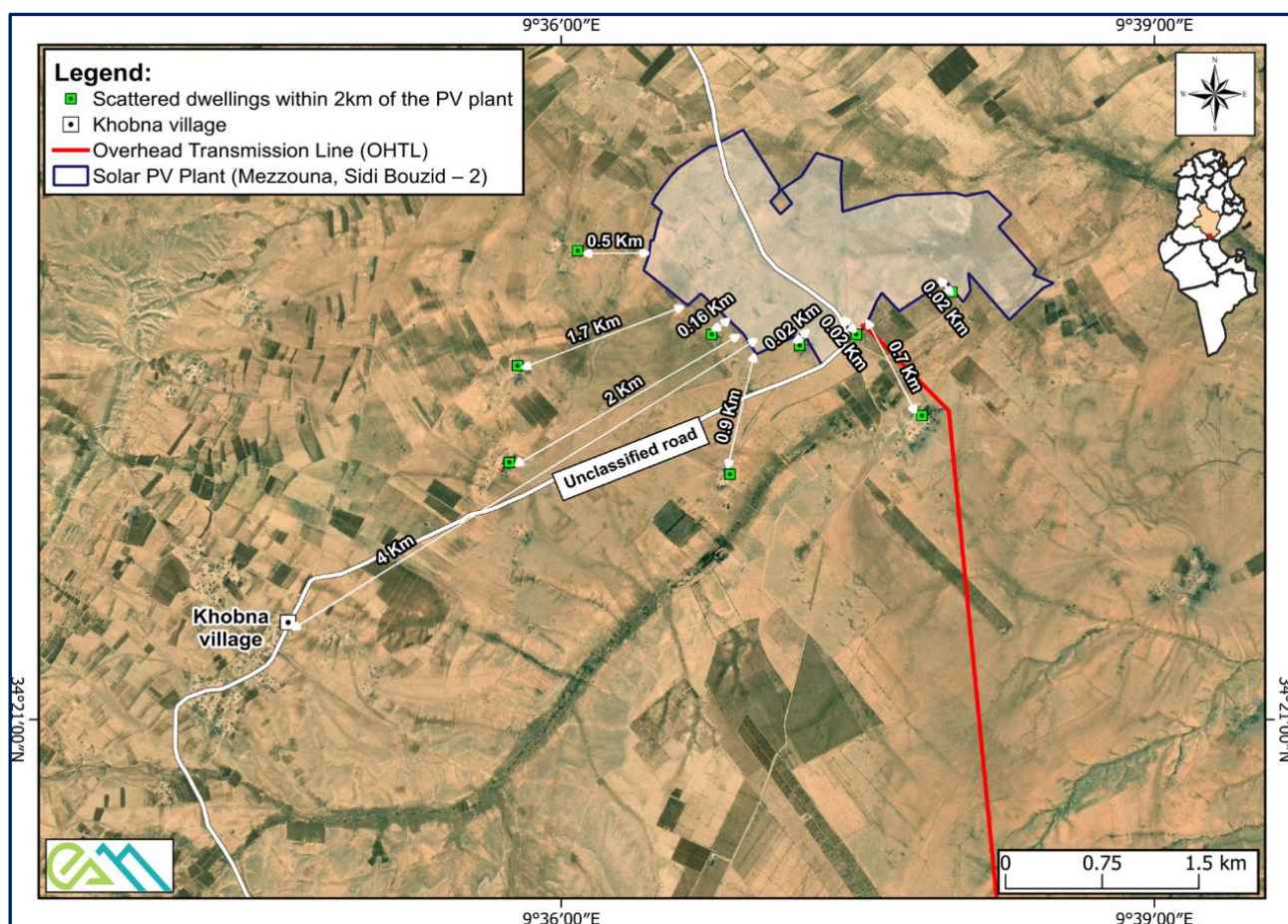


Figure 3- Vicinity of the Solar PV site

The PV Solar site is located on privately owned land and covers 13 land title records which belong to 10 different landowners. A 'Promise to Lease Agreement' were voluntarily signed on April 2023 and June 2025 between the Landowners and the Developer for its exclusive availability to the Developer for the construction, ownership, operation, maintenance and, if applicable, dismantling of the Solar Power Plant. The promise to Lease Agreement will be converted to a Lease Agreement after securing the Governor Authorization. The land required for the Solar PV site has been obtained on a "willing lease, willing lessor" basis, whereby the 10 individuals who privately own land have signed an in-principal agreement with SCATEC to lease land for the purpose of the Project and have the right to refuse their land to be used for the Project. There is no legal right under national legislation to force (expropriate) the landowners to allow their land to be used for the solar PV plant of the project. SCATEC, as a private company, do not have the legal right to force (expropriate) the landowners to allow their land to be used for the solar PV site.

Table 1 - Land Titles of the PV Plant

Landowner	Land Title	Parcel	Total Area (m ²)	Useful Area (m ²) for the PV plant
Landowner n°1	TF 76845	9	640,088	380,088
		10	11,115	11,115
Landowner n°2	TF 75640	9	60,000	60,000
Landowner n°3		108	70,446	70,446
Landowner n°3	TF 73650	45	779,682	930,000
			389,841	
Landowner n°4	TF 76844	7	90,327	90,327

Landowner	Land Title	Parcel	Total Area (m ²)	Useful Area (m ²) for the PV plant
Landowner n°5	TF107202	105	80,394	80,394
	TF97423	107	78,431	78,431
Landowner n°6	TF43580	122	298,785	298,785
	TF51233	123	169,067	169,067
Landowner n°7	TF63898	14	232,610	232,610
Landowner n°8	TF63899	12	96,648	236,327
		13	139,679	
Landowner n°8	TF66945	11	74,483.5	74,483.5
Landowner n°9			74,483.5	74,483.5
Landowner n°10	TF101164	1	177,231	177,231
	TF38390	121	95,000	95,000

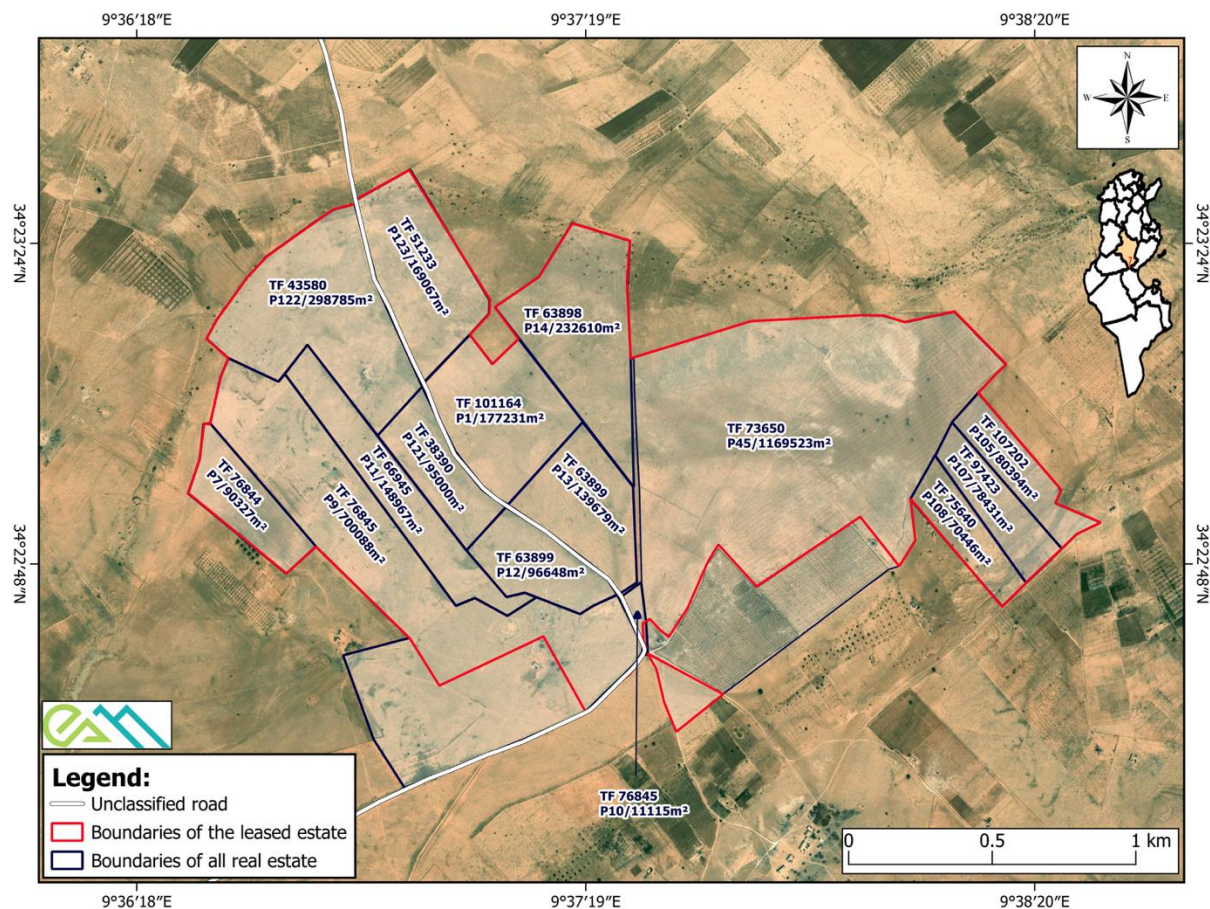


Figure 4- Land parcel map of the PV solar plant

The 12 km OHTL will be installed by the Developer to connect the solar arrays to the National Grid through the Mazzouna solar PV site, also under construction by SCATEC. The OHTL will have 7 summits (these designate a change in the direction of the OHTL) and intersect 19 privately owned land plots with the remaining intersecting state-owned land. Approximately 4% of the land intersected by the OHTL is used for agricultural activities (land used for fruit growing almond and olive trees). The remaining land is uncultivated, primarily due to a lack of rainfall and water resources, along with other environmental constraints..

The figure overleaf illustrates the land use categories crossed by the OHTL, as determined by satellite imagery and the results of the site visit on June 1st, 2025. Land use along the OHTL route includes open land (95.5%), olives and almond trees (2.3%), and vegetation planting (1.7%). In addition, as per the below figure, only 4 residential structures were identified along the route, with the nearest one located more than 100 m away from the line.

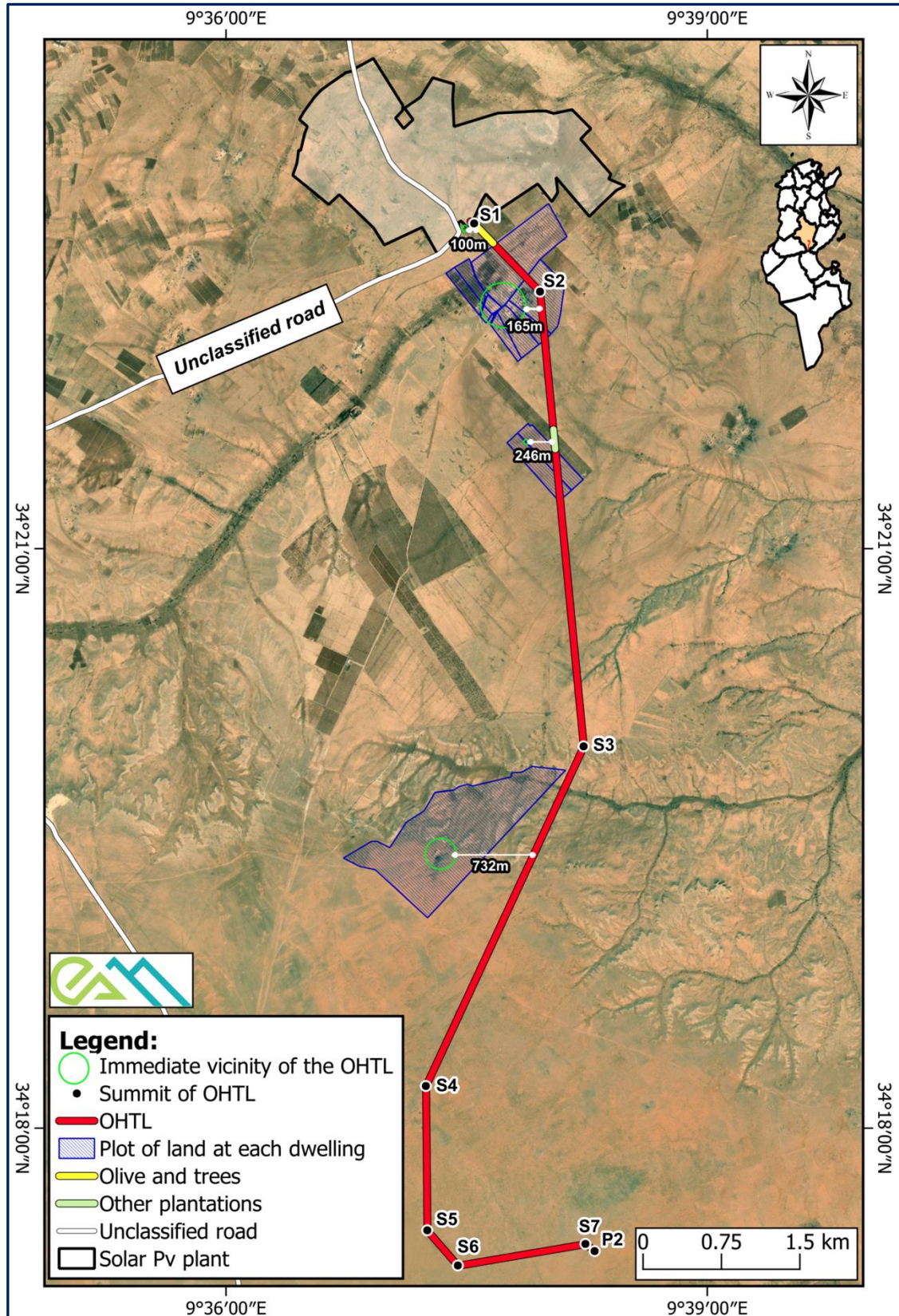


Figure 5- Land use along the OHTL route

The estimated number of pylons is 31 along the 12 km OHTL with the expected distance between pylons 350 to 500 m depending on the specific route and topography (refer to Figure 6). The footprint of the pylons is between 120 and 400 m² each as this depends upon the final type and size of pylon used. The pylon locations have been provisionally identified on technical grounds and the strategic aim to avoid small sections of land where olive plantations are present, as this is a high-value crop and it takes considerable time for a replacement olive tree to mature.

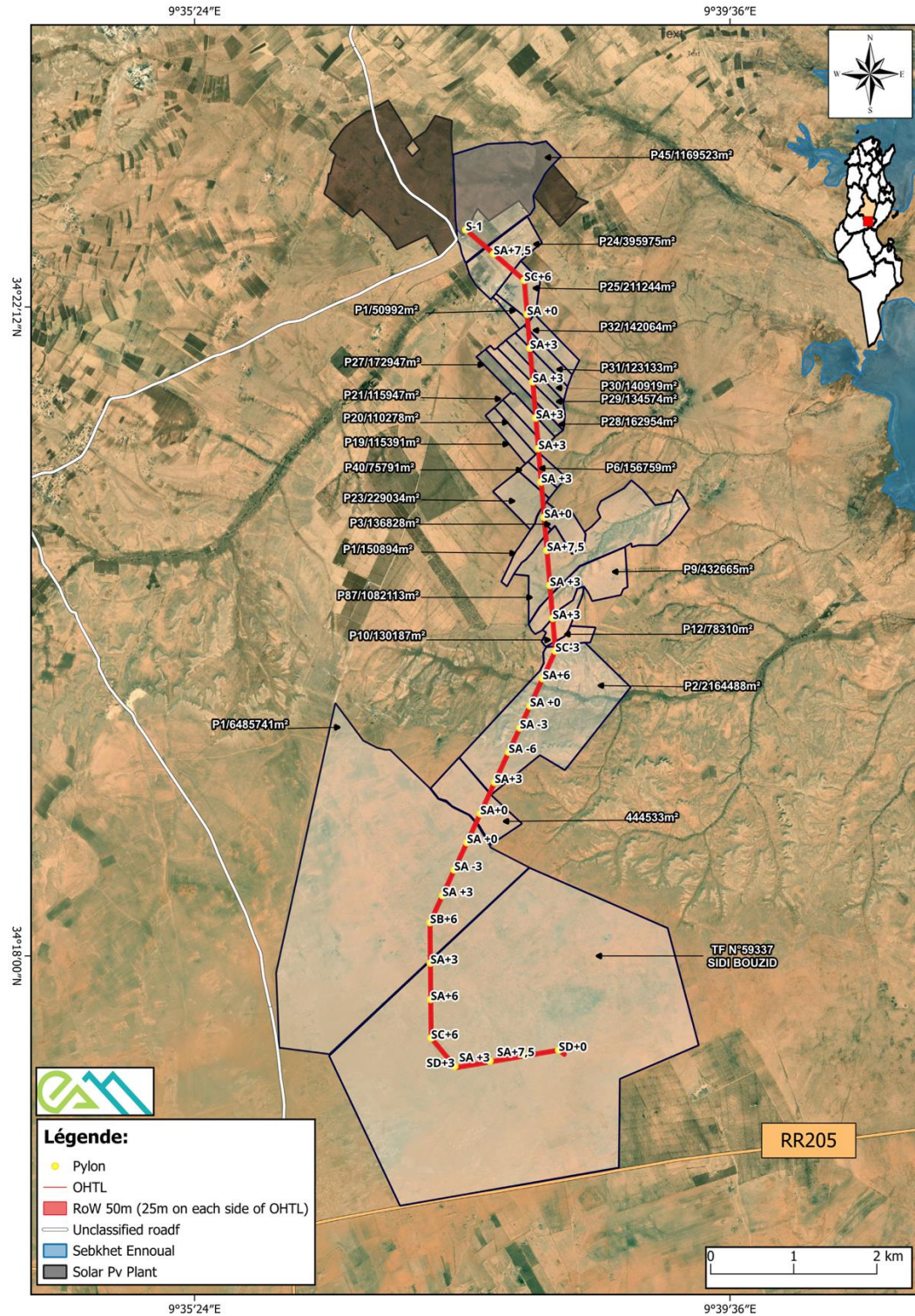


Figure 6- Position of 31 pylons along the 12 km of the OHTL

The indicative pylon locations have been sent to STEG who have subsequently issues a letter to government ministries with a request for them to issue a No Objection Certificate (NOC). According to the STEG matrix, the list of ministries involved in providing technical opinions on the routing of high-voltage overhead lines includes the following ministries: Ministry of National Defense, Ministry of Equipment, Housing and Land Use Planning, Ministry of State Property and Real Estate Affairs, Ministry of Agriculture (DGF, CRDA and SONEDE), Ministry of Transport, Ministry of Communication Technologies, Ministry of Cultural Affairs, Ministry of Interior, Gas Production and Transport Division, and Ministry of Industry and Small and Medium Enterprises.

Once the NOCs are obtained, or a request for a modified route is made in which case the process of requesting NOCs will be re-started, the final pylon locations will become known. SCATEC will use these final locations to conduct direct engagements with the private landowners along the route to reach a written agreement for a pylon to be located on their land. During operations, STEG who will operate the OHTL after construction, will also require the right to conduct maintenance activities as necessary. The written agreement will be signed once a one-off payment has been made by SCATEC to the private landowner (explained below).

As per established procedures under national regulation, only two types of land loss are considered under the compensation process:

- **Permanent loss of land use**, corresponding to the area physically occupied by pylon foundations and access road; and
- **Temporary loss of land use**, corresponding to land areas affected during the construction phase (e.g. stringing corridors, temporary access tracks, or storage areas).

For each affected plot, a compensation agreement is signed directly with the landowner prior to works, specifying the type of loss (temporary or permanent) and the compensation amount, calculated based on official valuation references and verified by STEG.

There is no compensation foreseen for the restrictions of use, except if it impacts existing activities that will be restricted due to the safety regulations (e.g. existing tall trees to be cut).

The written agreement issues by SCATEC does not transfer legal title of the private land to either SCATEC or STEG, and the land remains the property of the current landowner.

However, this agreement outlines the temporary and permanent damages caused by the installation of the transmission line and acceptance of compensation related to the damage. The one-off payment is calculated to reflect the value of the land as if it were being acquired, even though land acquisition is not taking place, and includes the land temporarily required for construction road access (where needed) to the exact pylon location. The agreement also covers temporary damages that may occur during cable pulling, including on plots not designated for pylon installation.

By signing this agreement, the landowner declares their acceptance of the construction and completion of the pylons installation work and undertakes to provide proof of their ownership or right to use the land covered by the agreement.

The right-of-way is not explicitly mentioned in this agreement (it is not written), but the owner must respect it. Building on the RoW is strictly prohibited. However, the landowner may use this land for farming.

If a private landowner refuses to have a pylon on their land, SCATEC will adjust the location of the pylon so that an adjacent landowner can be identified who is willing, or, as a last resort, use a Presidential Decree of 30 May 1922 to force the landowner to accept the payment through a legal process which would be conducted by STEG as a government entity. In this instance, the one-off

cash payment is paid into an escrow account until it is transferred to the landowner during the legal process. Because the landowner cannot refuse a pylon location or an access road to be positioned on their land and cannot refuse the rights of way for the overhead line, the involuntary resettlement safeguard requirements from EBRD/EIB apply to the location of the pylons and access road, and to the rights of way.

2.2 KEY PROJECT COMPONENTS

2.2.1 Solar PV Plant

The solar PV plant will be divided into blocks, where each block will be composed of PV Power arrays (typical structure of power arrays is presented in the figure below). Each array is made of PV panels and installed upon a mounting structure.

PV solar cells convert solar energy (radiation from the sun) into electricity using semiconductors (photovoltaic material that exhibit the photovoltaic effect); following the exposure of the PV panel to light, voltage is created in the material as photons from sunlight excite electrons in those materials into a higher state of energy, allowing them to act as charge carrier for an electric current. Solar cells produce Direct Current (DC) electricity from sun light, which can be used for grid connected power generation. However, electricity at the grid is usually in a different form (known as Alternating Current (AC)) and thus inverters are used to convert the DC current to AC current. In addition, cells produce electricity at a certain voltage which must be matched to the grid it connects to. Therefore, transformers are used to convert the output from the panels to a higher voltage that matches the grid.

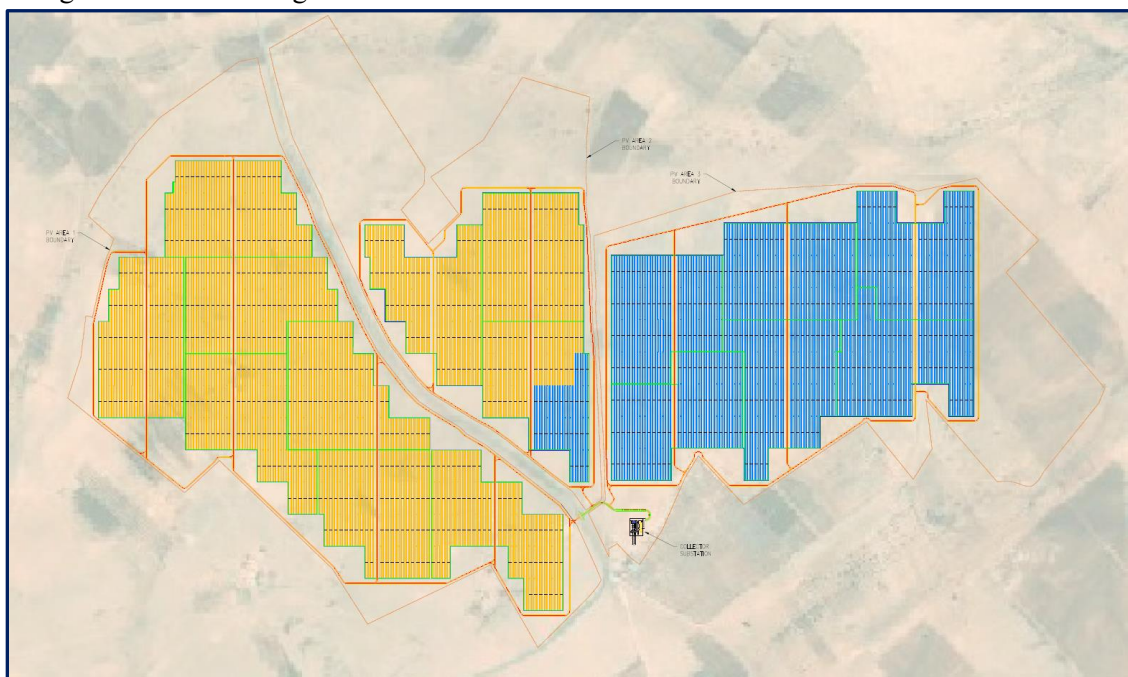


Figure 7- Layout plan for the solar PV plant

2.2.2 Dimensions of the OHTL – 225 kV along 12 km

Construction of the OHTL will comply with STEG's design criteria for minimum spacing described below:

(i) Minimum above-ground heights

Description	Minimal height
Ordinary terrain	8 m

Plantation (olive trees,	9 m
High traffic road	10 m
Railroads	11 m

(ii) Minimum distances from houses / dwellings

For 225 kV high voltage lines, the horizontal distance measured from the line axis to the dwellings shall be at least equal to the following values:

Description	Minimal distance
Immediate vicinity of Conductors	30 m*
Immediate vicinity of the Towers	Height of the tower

* 30 m to be considered as per EU standards considered as GIP by EBRD. It should be noted Minimal distance as per STEG is 14 m.

(iii) Minimum distances to roads

- A minimum distance of 40 m between the towers and the axes of agricultural roads.
- A minimum distance of 50 m between the towers and the axes of the classified roads.
- A minimum distance of 65 m between the towers and the axes of the highway.
- A minimum distance of 200 m between towers and road intersections.

For safety reasons during the unrolling works, the constructor must locate the anchoring towers at a distance ($d \geq 150$ m) from classified roads.

(iv) Right of way

Electricity transmission and distribution projects require Rights-of-Way (RoW) to protect the system from windfall, contact with trees, branches, utilities, buildings, and other potential hazards that may result in damage to the system, or power failures, and also to protect local community residents and land users. Once the route is finalized and construction begins, the minimum distance to be respected from the immediate vicinity of conductors is 30 m for 225kV OHTL.

During the installation of the OHTL pylons, temporary access roads (approximately 6m wide) may be required to enable the vehicles to access the exact location. During construction, the EPC Contractor will also require land for a worker camp and storage area although this will be situated inside the boundary of the PV site. Temporary road access to OHTL pylon locations are expected to be negotiated on a voluntary basis and not expropriated and included in legal agreements with landowners.

2.3 LITERACY AND GENDER DYNAMICS OF LAND OWNERSHIP AND USE

At the delegation of Mezzouna, the level of literacy is approximately 37.18 % (INS-2014) and the local people speak Arabic.

In Tunisia, women's access to land and property rights is limited, with women's land ownership in Tunisia not exceeding 5% in 2021. Many rural women are seasonal workers in agriculture and face difficult working conditions including physical labour in remote and harsh environment, the risk of GBV, and company-provided unsafe transportation. Despite their crucial role in food production and achieving food security, these women face economic hardships, with a substantial wage gap compared to men. According to a study in 2022, 60% of surveyed women experience hunger and malnutrition.

¹ Capire. (2021). Women struggle for land rights and equal inheritance in Tunisia. [online] Available at: <https://capiremov.org/en/women-struggle-for-land-rights-and-equal-inheritance-in-tunisia>.

² Al-Safir Al-Arabi. (2022). Rural Women in Tunisia: The Dilemmas of Informal and Feminized Labour. [online] Available at: <https://assafirarabi.com/en/24456/2022/03/08/rural-women-in-tunisia-the-dilemmas-of-informal-and-feminized-labour>.

In addition to economic challenges, rural women in Tunisia confront barriers in health care, education, and social services. The illiteracy rate among rural women is high, and a significant proportion of female workers in the agricultural sector are uninsured against occupational hazards³. Efforts to empower women, particularly in rural areas, have been made through feminist initiatives and associations⁴. These groups strive to create markets and resources for rural women, aiming to establish financial autonomy and recognize the value of their work in agricultural and handicraft sectors.

2.4 PROJECT POTENTIAL FOOTPRINT AND ASSOCIATED LAND IMPACTS

The project footprint on land comprises the following:

- The Solar PV Park area which covers 305 hectares;
- The 12 km OHTL route which currently includes 31 pylons and the rights of way; and
- A temporary worker camp and storage area which is not yet known and will be located by the EPC Contractor; and
- The potential need for temporary access roads to be installed from the connection with the nearest public road to the pylon locations. Note that the proximity to existing road infrastructure is one of several factors taken into consideration during the process used to identify the final locations of the pylons.

2.5 COMMITMENT TO AVOIDANCE AND MINIMISATION OF DISPLACEMENT IN FURTHER PROJECT DEVELOPMENT

In accordance with the objectives of EBRD/EIB policy frameworks, SCATEC has aimed to avoid, and where avoidance is not possible, minimise adverse impacts to landowners and land users. To achieve this, the following actions have been taken:

1. A commitment by SCATEC to keep open existing agricultural roads that provide access to nearby residences adjacent to the Solar PV site. These access roads, shown in green on Figure 8, will not be fenced and will remain fully accessible, as the Solar PV site will be divided into three separate and non-contiguous sections. The two green-marked roads will allow neighbouring households full access to their land which will not be severed by the Solar PV site.

³ Cities Alliance. (2023). Tunisia: Unlocking the Potential of Women as Agents of Change. [online] Available at: <https://www.citiesalliance.org/newsroom/news/cities-alliance-news/tunisia-unlocking-potential-women-agents-change>.

⁴ Human Rights Watch. (2022). President Saïed Derides the Economic and Social Rights of Tunisian Women. [online] Available at: <https://www.hrw.org/news/2022/08/16/president-saied-derides-economic-and-social-rights-tunisian-women>.

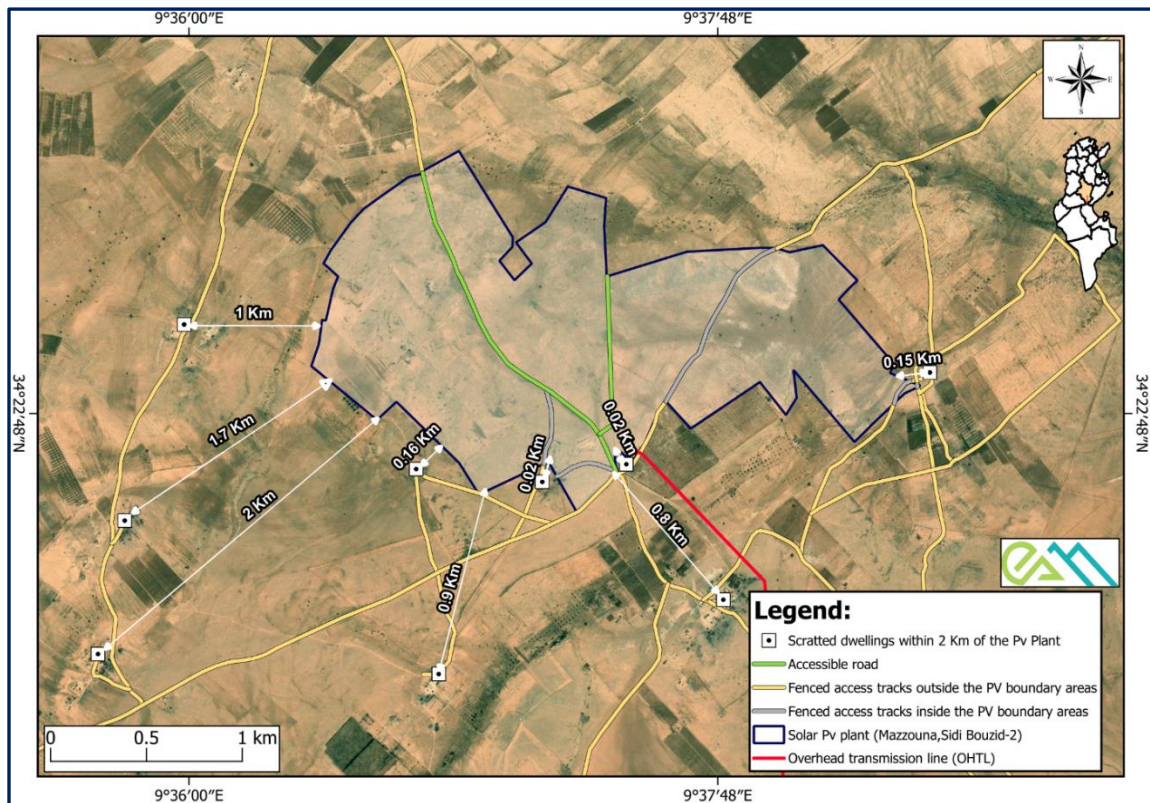


Figure 8- Scattered dwelling within 2 km of the PV Project and access road

2. The avoidance of land used for olive plantations during the indicative pylon routing.
3. The inclusion in the EPC Contractor's legally binding contract, a Pylon Routing Procedure to ensure that the EPC Contractor implements EBRD's and EIB's mitigation hierarchy and avoid/minimise adverse impacts on environmental and social receptors. The procedure will also ensure that pylon locations take into consideration stakeholder views when locating pylons on private land plots, so that they do not hinder future agricultural activities to the extent possible. The content of the Pylon Routing Procedure includes the following:
 - The commitment to identify landowners who are willing to have a pylon on their land through a process of negotiation so that the provisions of the Presidential Decree do not have to be applied using a legal process.
 - A review of satellite imagery to identify the nearby presence of structures, aiming to position pylons and also the connecting wires at least 50 m from any structure (residential and non-residential) (minimum distances are 30 m to a residential dwelling, but the aim is to achieve a greater distance than this). Minimum height restrictions for the wires have been stated in Section 2.12 above.
 - A check on the soil structure with the aim of avoiding areas (to the extent possible) where deeper foundations are required which could generate more soil disturbance, longer periods of where noise is generated, etc.
 - A review of sources of natural hazards, including seismicity, lightning strikes, land stability, and flooding.
 - A review of satellite imagery to identify the nearby presence of drainage features and any areas at risk of flooding which could put the workforce at risk during installation.
 - A review of satellite imagery to identify the nearby presence of existing roads, aiming to avoid/minimise the need to create a temporary access road from the nearest existing road to the pylon location.
 - Completion of a site visit to verify the suitability of the land to be used for the pylon, including land temporarily required for pylon access, pylon installation, and stringing of the conductors.

- Direct engagement with the land user and/or landowner (where relevant and if the land is privately owned) to discuss the actual location of the pylon construction and the timing when this is expected to occur, during the agricultural season (if the land is being used for agriculture).
- Preferential positioning of the pylons at the corner/edge of the land parcel, so that it reduces the future use of the land. Direct engagement with the land user/landowner must be recorded and their views taken into consideration to the extent possible, during the positioning of the pylon.
- Provide the land user (where present) and landowner (if privately owned) with details of the next steps associated with the future development of the Land Acquisition and Livelihood Restoration Plan, and details of Developer's Community Grievance Mechanism.

Overview of estimated involuntary resettlement impacts

The Table overleaf estimates the number of Project Affected Households (PAHs) based upon the information currently available. Assuming that each PAH includes 5 people in the household, then the total number of Project Affected Persons (PAPs) is currently estimated at 23 PAHs x 5 = 115. The total number of PAPs will be clarified in the LALRP as the number of people in each PAH will be determined during the future census and socio-economic survey.

Source of impact	Estimated displacement impacts
The installation of perimeter fences along the outer boundary of the Solar PV Site leading to a loss of access to the land inside.	Economic displacement arising from a loss of access to grazing land, currently used by a single herder who is supported by 2 workers. Project Affected Households = 3
The location of a pylon within a privately owned land plot leading to a loss of access to land.	Economic displacement arising from the future loss of access to land where the pylon is to be located, and damage to any trees, crops, or other assets impacted currently on the land (where present). Project Affected Households = 19
A loss of access to land where OHTL pylons are installed on state-owned land which are being used informally for grazing or other purposes.	Based upon the information available there is a single herder who uses state-owned land to the south of the OHTL for grazing. Project Affected Households = 1
Restrictions in the height of vegetation that is permitted along the route of the OHTL below the wires to maintain safety distances. Tall vegetation must be removed (if present) either now or in the future during operation of the OHTL.	Impacts to landowners arising from the potential (future) loss of vegetation and restrictions of use. Project Affected Persons = None identified at this time. The outcome of the site visit completed along the OHTL route (July 2025) did not identify any tall trees or vegetation that requires removal, even though the OHTL passes through two plots of land where olive and almond trees are present. These impacts have been avoided by placing pylons either side of the land plots to ensure the wires are of a sufficient height above the vegetation. The situation shall be reviewed prior to the start of OHTL construction as the vegetation and trees may have grown higher since the survey was completed.

Unexpected damage to trees and vegetation that occurs during the OHTL stringing process.

Project Affected Households = None identified at this time although this may occur during the stringing process to the owners of assets below the route if the wires were to suddenly fall during installation.

3 LEGAL AND POLICY FRAMEWORK

3.1 LEGAL FRAMEWORK

3.1.1 Land Tenure Regimes

Land tenure in Tunisia comprises the following regimes:

- Private land: These are lands that belong to individuals exercising full ownership rights including registered lands, lands subject to notarial deeds and lands subject to certificates of possession.
- Registered land: Governed by the land law of 01 July 1885, and updated by the 1965 Code of Real Rights, this category includes lands whose legal and material status is verified through registration in a National Land Book. However, approximately 60% of these titles are outdated and do not reflect recent transfers of land ownership from inheritance or private sales.
- Land with notarial deeds: These lands have notarial deeds documenting property ownership and transactions, certifying ownership rights.
- Land with certificate of possession: Farmers who are without formal title although have used agricultural land for five uninterrupted years in 'good faith' can obtain a Certificate of Possession that will grant them access to agricultural credits which can subsequently be used to secure land.
- State lands: These are part of the state's private domain (government-owned land) where the land is managed by the Ministry of State Domains and Land Affairs.
- Collective lands: Traditionally shared by tribes or communities, these lands have been gradually reduced due to the private ownership of land since the 1960s. Where such land occurs, state supervision involves various levels of governance, including local and regional councils coordinating with community-elected management councils who manage collective land.
- Habous lands: Originating from a Muslim practice, these lands are inalienable (i.e. not transferrable) and dedicated to benefiting the broader society. Their abolition in 1957 and 1965 led to the integration of Habous land into state lands.

3.1.2 NATIONAL LEGISLATION

As stated in Section 2, agreements for the installation of pylons will be signed directly between SCATEC and private landowners. SCATEC will provide a one-off payment. The value of the one-off payment will reflect the full replacement cost price of the land. However, if a landowner refuses to have a pylon on their land, SCATEC, through STEG, have the legal right to resort to the Presidential Decree that will force the landowner to accept the pylon.

3.1.3 THE EXPROPRIATION LAW FOR PUBLIC UTILITIES

Whilst no expropriation is expected to occur, details are included in the LARF as the OHTL is considered a public utility.

In Tunisia, public utility expropriation is regulated by Law No. 2016-53 of 11 July 2016, focusing on fair compensation. This law permits expropriation by state, local authorities, and public organizations authorised by their laws. Compensation can be settled either amicably or legally, requiring a provisional indemnity. A notable amendment in decree-law No. 2022-65 on 19 October 2022, expanded compensation options, allowing for in-kind compensations for all expropriated properties, beyond just agricultural land.

To manage an expropriation process, two commissions are established at Governorate level:

1. Recognition and conciliation commission: Chaired by a judge, this commission assesses the legal and material status of properties targeted for expropriation. It is responsible for making

administrative decisions regarding the expropriation process.

2. Acquisitions commission for public projects: This commission is crucial in conducting preliminary procedures for expropriation. The commission's tasks include proposing draft decrees for expropriation, publicising expropriation intentions, registering and examining objections to the expropriation, updating the list of individuals affected and the compensations accepted, and preparing necessary documentation for contractual formalities with the affected parties.

Upon the completion of these procedures, the expropriating entity receives the necessary documentation and drafts an expropriation decree, detailing the public project, expropriations, and affected owners. The compensation is determined and publicly displayed, with affected parties being informed in writing. Following a one-month period for registering complaints, the expropriation is formally registered in the Land Register, marking the completion of the process. Generally, STEG uses a negotiation procedure and avoids the use of this expropriation law, so that the land ownership does not change. However, this is still available to STEG if negotiations fail.

3.1.4 TEMPORARY OCCUPATION OF A RIGHT-OF-WAY

Two decrees, dating from the time of the beylical dynasty, from 1705 to 1957, provide a framework for the right of easement or right of way for electricity lines:

- Decree of 12 October 1887 relating to the establishment, maintenance and operation of telegraph and telephone lines.
- Decree of 30 May 1922, relating to the establishment, maintenance and operation of electric transmission lines.

These decrees allow power lines to cross private lands, including agricultural areas, without needing to buy the land or expropriate it. There is under these decrees, no transfer of ownership or expropriation required for power lines, neither in front of the line nor in front of the pylons. However, they do require compensation for any damage to land assets caused by the easements, whether the land is owned or used by someone else. The compensation goes to the owner of the damaged assets, such as the owner of agricultural crops (for example).

- ✓ Easements can be compensated: when they cause damage to the land crossed, compensation must be paid.
- ✓ Compensation is payable to those who use the land crossed, whether they own it or not. Where land is owned by one person, but used by another, it is the latter who is entitled to compensation.
- ✓ The passage of a transmission line is forbidden through any fenced property and over existing buildings (decree of May 30, 1922 on the establishment and maintenance of power transmission lines). Tunisian law therefore de facto minimizes the impact a line project could have on physical movement by outlawing it. STEG concludes temporary occupation agreements with landowners and/or farmers before work begins. The same agreements are concluded with the owners and farmers using the land where the pylons will be installed, even if the occupation will be for a much longer period.
- ✓ These agreements give rise to compensation payments in the event of crop damage.

3.1.5 LEGISLATION CONCERNING SOCIAL WELFARE ISSUES

The main Tunisian regulation concerning social welfare issues are:

- Decree of 18 August 1958, Code of Personal Status stating equal rights between the sexes regarding divorce, employment, business property and the banking sector, and prohibits polygamy, establishing a legal age of marriage at 18 for girls.
- Article 21 and 46 of the Tunisian Constitution (January 2014), all citizens have same rights and

obligations, and the State guarantees to protect all women's acquired rights.

- Law n°2017-58 of 11 August 2017 concerning the elimination of violence against women. The law aims to put all measures to eliminate all forms of violence based on gender discrimination in order to ensure equality and respect for human dignity, according to a comprehensive approach focused on the fight against its different forms, through prevention, prosecution and repression of its perpetrators, and protection and care of victims.

3.1.6 PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

The main Tunisian regulation concerning public consultation and information disclosure are:

- Decree n°328-2018 of 29 March 2018 concerning public consultation.
- Decree N°2005-1991 regarding EIA process. To date, there is no obligation for publishing EIA reports.
- Law n°2011-41 of 26 May 2011, regarding access to administrative documents of public agencies and administrations.
- Article 32 of the Tunisian Constitution (2014), the State must guarantee the right of access to information.
- Article 139 of the Constitution, local authorities shall adopt all mechanisms of participatory democracy and open governance to guarantee the participation of citizens in the preparation of land use planning and development projects.
- Organic law n°2016-22 of 24 March 2016, on the information access right, which defines the access right to any information concerning programs, projects, benefits, financial aspects, owners.

In summary, national legislation concerning the expropriation process provides the following information to the displaced persons:

- Details of the land parcel which is impacted and compensation monies due; and
- Details concerning the type, quantity, and compensation to be paid for the damage to crops and trees.

3.2 EBRD ENVIRONMENTAL AND SOCIAL REQUIREMENTS

The Environmental and Social Policy (2024) contains 10 Environmental and Social Requirements (ESR) to manage environmental and social risks and impacts.

The objectives of ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement are to:

- Avoid involuntary resettlement or, where unavoidable, minimise involuntary resettlement by exploring feasible alternative project designs and sites.
- Avoid forced eviction.
- Mitigate unavoidable adverse social and economic risks and impacts from involuntary resettlement on affected persons by:
 - i. providing timely compensation for loss of assets at full replacement cost⁶⁴.
 - ii. assisting affected persons in their efforts to improve or at least restore their livelihoods and standards of living in real terms relative to pre-displacement levels.
 - iii. improving the living conditions of physically displaced vulnerable people by providing adequate housing (including essential services and utilities) with security of tenure at resettlement sites.
 - iv. ensuring that land acquisition, restrictions on land use, other assets and natural resources and involuntary resettlement activities are planned and implemented with meaningful consultation, participation and disclosure of

information.

- v. providing affected persons with access to grievance mechanisms in accordance with the requirements of ESR 10.
- vi. enabling displaced persons to benefit directly from the project, where the nature of the project affords such opportunities.

ESR 5 applies to physical or economic displacement that can be full or partial, permanent or temporary, and resulting from the following types of transaction:

- Land rights and/or assets acquired through expropriation or other compulsory procedures in accordance with national law.
- Land rights and/or assets acquired through negotiated settlements, if expropriation or other compulsory processes can be initiated where negotiation fails.
- Restrictions that result in people experiencing loss of access to land, assets, natural resources or livelihoods, irrespective of whether such rights of restriction are acquired through negotiation, expropriation, compulsory purchase or by means of government regulation relocation of people without formal, traditional or recognisable usage rights under national law, who are occupying or utilising land prior to the cut-off date.
- Displacement of people as a result of project impacts that render their land or assets unusable or inaccessible.
- Displacement impacts that may occur in host communities due to the relocation into such communities of affected persons physically displaced by a project.

ESR 5 key requirements are as follows:

- The Client must consider feasible alternative project designs and sites to avoid or at least minimise physical and/or economic displacement.
- The Client must seek to acquire land rights through negotiated settlements even if it has the legal means to gain access to the land without the consent of the seller.
- Impacts on vulnerable groups must be identified and assessed, so that assistance measures tailored to the different needs of vulnerable groups can be designed through consultation activities.
- Relevant gender dimensions of resettlement must be considered throughout the process of undertaking baseline surveys, impact assessment, mitigation and monitoring processes.
- A census and socio-economic survey and assessment must be undertaken to (i) describe the baseline circumstances of the displaced persons; (ii) identify persons who are affected by the project including vulnerable people/groups; and (iii) determine who will be eligible for compensation and assistance. The census must take into account seasonal resource users who may not be present in the project area at the time of the census.
- The client must establish a cut-off date for eligibility in accordance with applicable legislation or using the end date of the census or the asset inventory (whichever is the latest).
- The valuation of all assets must be calculated at full replacement cost and shall be performed by qualified valuers. The valuation methodology for determining replacement cost must be documented and included in relevant Land Acquisition and Livelihood Restoration Planning documents.
- Where restrictions on land use, other assets and natural resources (whether permanent or temporary) cannot be avoided, the Client must offer compensation to affected persons at full replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living and livelihoods.
- Where a project involves the loss of community facilities, utilities or public amenities,

or access thereto, the Client must replace these to ensure a better or similar level of service, based on consultation with the affected community and relevant government stakeholders to identify and agree upon suitable alternatives.

- Meaningful consultation of affected persons and communities, including host communities, must be undertaken throughout the process of Land Acquisition and Livelihood Restoration Planning and implementation in accordance with principles and processes outlined in ESR10, alongside the disclosure of relevant information.
- An effective grievance mechanism must be established as early as possible.
- To address the risks and impacts of physical and /or economic displacement, the Client must prepare a LALRP proportionate to the risks and impacts associated with the project.
- Procedures to monitor and evaluate the implementation of the LALRP must be established and the Client must take corrective action if necessary, during implementation to achieve the objectives of ESR5 and EIB ESS6.
- Monitoring of the Project-related impacts to land must be carried out in accordance with ESR1 and will involve the participation of key stakeholders, including affected communities.

The objectives of ESR10: Stakeholder Engagement are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders.
- Provide a means for effective and inclusive engagement with project stakeholders throughout the project cycle.
- Ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with the project's stakeholders and, where appropriate, that feedback provided through the consultation is taken into consideration.
- Ensure that grievances from stakeholders are responded to and managed appropriately.
- Ensure that stakeholder engagement is conducted in a manner that protects the privacy and safety of stakeholders and is free from retaliation.

3.3 ***EIB PERFORMANCE REQUIREMENTS***

The objectives of **EIB ESS6** – Involuntary Resettlement are to:

- To avoid or, when unavoidable, minimise involuntary resettlement by exploring alternative projects, project designs and locations;
- To avoid any forced evictions;
- To improve displaced persons' livelihoods and/or living standards, or at least restore them to pre-project levels;
- To improve living conditions among displaced poor and other vulnerable groups to at least minimum living standards, promoting adequate housing³ and security of tenure⁴;
- To mitigate social and economic impacts from unavoidable involuntary resettlement by: (i) providing timely compensation for a loss of assets at the full replacement cost; (ii) ensuring that resettlement is designed, planned and implemented with the appropriate disclosure of information to those affected along with their consultation and informed participation; (iii) providing displaced persons with access to grievance mechanisms; and (iv) as a development opportunity enabling displaced persons to benefit directly from the project, as the nature of the project may warrant.

The scope of ESS6 is provided below:

ESS6 applies to a specific project when its relevance is determined during the

environmental impact assessment/environmental and social impact assessment (EIA/ESIA) process (as outlined in Standard 1), and specifically to all EIB-financed projects that lead to permanent or temporary involuntary resettlement resulting from:

- a. The acquisition or restriction of land rights or land-use rights through expropriation or other compulsory procedures in accordance with national law.
- b. The acquisition or restriction of land rights or land-use rights through negotiated settlements, if expropriation or other compulsory procedures can be initiated in the case of failed negotiations.
- c. Restrictions on land use that result in a loss of access to land, physical, cultural assets or natural resources.

The general requirements from ESS6 are similar to those outlined above for EPR6 and include the minimisation of adverse impacts through design of the Project, a census, socio-economic baseline and cut-off date, stakeholder engagement and disclosure, a grievance mechanism, additional support to be provided to vulnerable people and women (where applicable) to reflect prevailing gender dynamics, and the development of a resettlement plan that includes eligibility criteria and entitlements.

ESS2 covers stakeholder engagement, and the objectives are:

Adopting an inclusive and systematic approach to engaging constructively with stakeholders, namely persons and/or communities who are directly or indirectly affected by a project, or those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively;

- b. Ensuring that stakeholders have timely access to information on the project's environmental, climate and/or social risks and impacts in a manner that is culturally appropriate and understandable to all stakeholders, including those needing special measures or assistance;
- c. Promoting and enabling the meaningful and free participation and input of stakeholders in project-related decision-making processes that may affect them, thereby seeking to build mutual trust and improving project outcomes;
- d. Providing rights-holders with effective means to raise grievances and access remedies, and promoting organisational accountability and continuous learning and improvement.

3.4 *GAP ANALYSIS*

Table 2 - presents a summary of the institutional and legal framework that has informed the preparation of this Framework. The Table provides a comparison of national legislation on resettlement to ESR5, identifies gaps or conflicts, and proposes a way forward to meet ESR5, ensuring that the most stringent requirement applies and that displaced persons are safeguarded from adverse impacts.

A similar table (Table 3 -) is provided for EIB ESS6 – Involuntary Resettlement.

Table 2 - Gap Assessment of EBRD ESR5 and Tunisian Laws and Regulations

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
Involuntary resettlement, physical and economic displacement	The term involuntary resettlement refers to physical or economic displacement occurring as a result of affected individuals / communities not having the right to refuse land acquisition or restrictions on land use.	Tunisian legislation, including the Expropriation Law for Public Utilities, does not recognise “ <i>involuntary resettlement</i> ”. Issues related to land acquisition in the public interest are regulated by Expropriation Law and for transmission lines, the Presidential Decree of 30 May 1922. The law regulates the right of the state to expropriate properties of natural or juridical persons in the public interest and does not consider loss of livelihoods.	The owners of assets and those involved in formal and informal land use activities, affected by physical and economic displacement that arises from loss of property and/or restrictions on land use or access, will be eligible for compensation.
Land acquisition and restrictions on land use	Involuntary resettlement occurs as a result of: Land acquisition leading to physical and/or economic displacement, which includes outright purchases of property or purchases of property rights (such as rights of way, easements). Restrictions on land use that result in physical and/or economic displacement, irrespective of how such restrictions are established (such as through negotiation, compulsory purchase or by means of government regulation). Involuntary resettlement (displacement) can be full, partial, permanent or temporary.	Tunisian legislation, including the Expropriation Law for Public Utilities, only refers to the acquisition of property which includes crops and trees, etc.	A LALRP will be prepared using the LARF as a basis, which will describe the different sources of involuntary resettlement that will occur. The LALRP will describe instances where involuntary resettlement is either full, partial, permanent, or temporary.
Negotiated settlements	Negotiated settlements in acquiring land or property are encouraged to avoid expropriation and eliminate the need to use governmental authority to remove people forcibly.	This is not a requirement under national legislation.	A process of negotiated settlements will be used to obtain access land required for the OHTL. The provisions of the Presidential Decree of 30 May 1922 associated with the installation of transmission lines will be used as a last resort.
Avoidance or minimisation of displacement	Consideration of feasible alternative project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social and economic costs and benefits.	This is not a requirement under national legislation.	Whilst the routes of the transmission lines have been identified, there is an opportunity to conduct a site-specific assessment of each transmission line pylon, with the aim of avoiding/minimising adverse

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
			impacts to the extent possible, in accordance with the mitigation hierarchy. This is included in the EPC Contractor's Pylon Routing Procedure.
Information disclosure, consultation and informed participation of affected persons, including host communities	Affected persons (men and women) shall be given the opportunity to participate in their selection of entitlements, negotiation of the compensation packages, resettlement assistance, suitability of proposed resettlement sites and proposed timing. Consultations will continue during the implementation, monitoring and evaluation of compensation payment and resettlement outcomes. The client should consult with affected people and summarize the information contained in a LALRP (which will be disclosed) to ensure that they understand the compensation procedures and know what to expect at the various stages of the project.	This is not generally a requirement under national legislation. During the use of the Presidential Decree of 30 May 1922, details of the land and other assets which are to be impacted and their value is provided to the displaced person through a Written Agreement.	This LARF contains details of the process to be used for displaced persons to be given the opportunity to participate in defining their entitlement choices, negotiation of the compensation packages, and resettlement assistance. Consultations with the displaced persons will continue during the implementation, monitoring and evaluation of compensation payment and resettlement outcomes. The LARF describes the way in which displaced persons will be provided with details of the key components of the LALRP, and what to expect at various stages during implementation.
Vulnerable groups	The client will specifically take into account any individuals or groups that may be disadvantaged or vulnerable and undertake the necessary actions to ensure they are not disadvantaged in the resettlement process, are fully informed and aware of their rights and able to benefit equally from the resettlement opportunities and benefits. Vulnerable or at-risk groups include people who, by virtue of gender identity, ethnicity, age, disability, economic disadvantage, or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of project benefits.	This is not a requirement under national legislation.	The LARF and Stakeholder Engagement Plan already prepared for the Project describes the way in which the needs of disadvantaged or vulnerable persons or groups will be consulted, taken into consideration in decision-making, and how they will be kept informed of their rights and opportunities to benefit from the Project. During preparation of the LALRP a range of consultations will be undertaken with vulnerable people.
Census and socio-economic survey and assessment	Implementation of a census to identify the persons who will be displaced, determine who will be eligible for compensation and assistance and prepare an asset inventory. The census should also take into account	This type of formal process is not a requirement under national legislation although details of the displaced persons who have ownership rights	The LARF describes the process to be used to conduct a future census and socio-economic survey of the displaced persons, linked to the establishment of a cut-off date (see below).

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
	seasonal resource users who may not be present in the project area during the time of the census. Implementation of a socio-economic baseline assessment on project affected persons, including impacts related to land acquisition and land use restrictions.	recognised by law, is compiled during an expropriation process.	
Cut-off date	In the absence of national government procedures, the client will establish the cut-off date for eligibility for compensation and assistance. Using the date of the census is often most practical. Persons who move into the project affected area after the cut-off date will not be eligible for compensation and other types of assistance. Information regarding the cut-off date will be well-documented and disseminated throughout the project area.	A cut-off date is not included in national legislation although the valuation report prepared for the assets provides a dated record as to when the valuation was conducted, and details of the assets subjected to expropriation. The cut-off will be published and clearly communicated to the public in the governorates through publication in the Official Journal, paper posters being installed at the governorate headquarters, and individual notifications will be made in writing, to the owners of impacted assets.	A cut-off date will be set based upon the final day of the census update and verification fieldwork, whichever is the latest. The purpose and actual date of the cut-off date, will be publicly disclosed to the displaced persons and relevant government representatives, including local communities in the manner described here. An acknowledgement form will be used to ensure that each representative of a displaced household has received details of the cut-off date during the census update and verification fieldwork.
Compensation at full replacement cost	Compensation for loss of assets will be provided at full replacement cost, usually calculated as the market value of the assets plus the transaction costs related to restoring such assets (such as registration and transfer taxes). Depreciation of assets is not taken into account. The valuation method for determining replacement cost must be documented in RAPs/Land Acquisition and Livelihood Restoration Plans. Where land markets are in a formative stage, clients should seek valuation by external independent professional valuation experts.	Compensation for the loss/damage to assets is valued according to their market price, which may not reflect the 'full replacement cost'.	Compensation for all assets lost will be calculated using the full replacement cost, which includes any administrative costs and fees which may apply and excludes depreciation. The valuation process is presented in the LARRF and will be applied during preparation of the LALRP.
Standards for compensation	Standards for compensation and assistance will be transparent and consistent within the project.	This is not a requirement under national legislation although in practice, standards for compensation are consistent as the market price is used to value assets.	The LARF contains a description of the standard for compensation to ensure that this is consistent between displaced persons. The method of valuation applied will be disclosed during preparation of the LALRP so that this is clear

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
			and understandable to the displaced persons and other interested stakeholders. This will include group discussions to present the valuation calculation methodology which will be undertaken during preparation of the LALRP.
Timing of compensation	Compensation will be provided before displacement or imposition of restrictions. Alternative housing and/or cash compensation) has to be provided prior to relocation. The process of promptly compensating economically displaced persons for loss of assets or access to assets should be initiated prior to displacement.	Compensation for land and damages to crops should be paid before the actual loss occurs.	Compensation will be provided before resettlement impacts such as displacement or imposition of restrictions occur.
Compensation in kind/cash	Losses that cannot be valued easily, or compensated in cash, can be compensated in kind if appropriate. Where livelihoods of affected persons are land-based or where land is collectively owned, land-based compensation will be offered, taking into account seasonal and agricultural timing requirements. Payment of cash compensation for lost assets may be appropriate where: • Livelihoods are not land-based • Livelihoods are land-based but the land taken for the project is a small fraction of the affected asset and the residual land is economically viable • Active markets for land, housing and labour exist, displaced persons use such markets, and there is sufficient supply of land and housing.	Under Tunisian law, monetary compensation is provided for loss of crops, whilst the loss of land acquired is addressed through either in-kind provision of state land, or cash compensation. However, in this project no land is being acquired.	Private landowners will be compensated for their loss of land from installation of a OHTL pylon through a one-off payment in cash, or in-kind replacement land (whenever feasible) where a loss of livelihood occurs.
Other resettlement/relocation assistance	Provision of relocation/resettlement assistance sufficient for affected people to restore and, where possible, improve their standards of living and/or livelihoods. Specific resettlement assistance should be provided for the poor and the vulnerable.	This is not a requirement under national legislation.	The LARF includes an eligibility and entitlement matrix presenting measures to provide support to restore/improve displaced persons standard of living/livelihood, and to provide additional assistance to vulnerable people.
Restoring (improving) standards of living	The aim of compensation at full replacement cost and other resettlement assistance is to, at a minimum, restore	This is not a requirement under national legislation.	The valuation methodology applied to calculate compensation for loss of assets and other

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
and livelihoods, opportunities for deriving benefits from the project	standards of living and/or livelihoods of displaced persons to pre-displacement levels, or ideally improve them. The Client will provide opportunities to displaced persons and communities to derive appropriate development benefits from the project.		resettlement impacts reflects the principle of full replacement cost. The eligibility and entitlement matrix includes a commitment to preferentially offer displaced persons temporary employment opportunities during the construction stage of the Project. Such opportunities will be offered to both the adult male and female members of displaced households.
Categories of displaced persons	Category 1: those who have formal legal rights to the land (including customary and traditional rights recognised under national laws). Category 2: those who do not have formal legal rights to land at the time of the census but who have a claim to land that is recognised or recognisable under national laws. Category 3: those who have no recognisable legal right or claim to the land they occupy, including seasonal resource users such as herders/fishing families, hunter and gatherers who may have interdependent economic relations with communities located within the project area.	National legislation recognises Category 1 and 2 displaced persons through the holders of formal title deeds, property holdings recognised by community leaders, and the collective ownership of land recognised by the regional councils. National legislation does not recognise Category 3 of displaced persons.	The resettlement principles recognise the potential presence of all 3 categories of displaced persons, who are eligible for compensation and other assistance in accordance with the eligibility and entitlement matrix.
Joint property	Ensure that the documentation for ownership or occupancy and compensation is issued in the names of both spouses or single head of households, whichever is relevant to each situation, and that other resettlement assistance, such as skills training, access to credit and job opportunities are equally available to women and adapted to their needs. Alternative methods and/or modalities for compensation should be considered where women are less likely to have access to formal financial institutions and/or have bank accounts.	National legislation does not require compensation to be provided jointly, just to be legally recognised owner. Women are able to hold and transfer land rights.	The LARF includes a commitment to provide compensation equally available to both spouses, as well as measures to restore standards of living. Cash compensation will be paid either 50/50 between the adult male and female in married displaced households, or into a joint bank account if both spouses agree.
Grievance mechanism	The grievance mechanism will be set up as early as possible in the process to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or	Displaced persons are able to raise a grievance to the Reconciliation Commission and, if this approach fails	The LARF includes details of SCATEC's grievance mechanism which aims to record grievances raised during preparation and implementation of the LALRP and resolve grievances as soon as possible

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
	members of host communities, including a recourse mechanism designed to resolve disputes in an impartial manner. Consistent with PR10, the grievance mechanism, should address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution.	to reach agreement, the judicial court process.	but allowing for an appeals procedure if the initial decision on the grievance is not acceptable to the complainant. The aim is to avoid recourse to judicial or administrative processes, as this could lead to significant delays. However, the grievance mechanism recognises that a complainant has a right to legal/administrative recourse if he/she is not satisfied with the final decision arising from application of the grievance mechanism.
Resettlement and/or Livelihood Restoration Frameworks and Plans	When the exact nature or magnitude of the land acquisition or restrictions on land use is still unknown, a Resettlement and/or Livelihood Restoration Framework will be developed. Once the individual project components are defined and the required information becomes available, the framework will serve as a basis for the development of a RAP/Land Acquisition and Livelihood Restoration Plan.	Not required under national legislation.	The LARF has been prepared whilst the revision to the Project design is ongoing. The LARF will be used as the basis to prepare a LALRP in the future, when the final design is available and when any necessary approvals have been obtained for the Project to proceed.
Responsibility of the host government	Where land acquisition and resettlement are the responsibility of the host government, the (private sector) client will develop and implement a plan for bridging the gaps between entitlements provided under national law and those required under ESR5.	N/A – as SCATEC will lead the development and implementation of the LALRP	
Monitoring and completion report	Monitoring of the resettlement and livelihood restoration process will be carried out in accordance with PR1 and should involve key stakeholders such as the affected communities. Depending on the scale of a project's resettlement, the client may have to commission an external completion audit of the RAP/Land Acquisition and Livelihood Restoration Plan to determine that their provisions and objectives have been met. The audit may identify corrective measures if non-compliances are identified. Resettlement will be considered complete when the adverse impacts of resettlement have been addressed in a	Monitoring and evaluation activities, and the preparation of a LALRP Completion Audit are not required under national legislation.	The LARF includes details of a monitoring and evaluation framework and commits to undertaking an internal Completion Audit to check that standards of living of the displaced persons have been restored at a minimum, if not improved. The remaining actions required to achieve the objectives of the LALRP will be placed into a Corrective Action Plan which will be implemented, and actions tracked until they are closed.

Topic	EBRD policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
	manner that is consistent with the objectives stated in the RAP as well as the objectives of ESR5.		
Livelihoods	Livelihoods may consist of wage-based incomes and/or incomes derived by individuals, families and/or communities from resource utilisation.	Livelihoods are not specifically recognised under national legislation.	The resettlement principles recognise the potential for impacts to occur on displaced persons livelihoods, and livelihood restoration measures and other types of assistance are included in the eligibility and entitlement matrix.
Entitlements in case of economic displacement (temporary or permanent)	Category 1 and Category 2 should receive: compensation for loss of assets or access to assets, at full replacement cost, replacement property of equal or greater value, or cash compensation at full replacement cost. Category 3 should receive: Compensation for loss of assets other than land (crops, irrigation infrastructure and improvements made to land) at full replacement cost.	See above. Category 3 displaced persons are not recognised under national legislation.	The LARF principles commit the Project to providing compensation to all 3 categories of displaced persons at full replacement cost, along with the provision of livelihood restoration measures.

Table 3 - Gap Assessment of EIB's ESS6 and Tunisian Laws and Regulations

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
Project Design	The promoter shall consider and document feasible alternative projects, project designs and/or locations to avoid and/or minimise physical and/or economic displacement.	This is not a requirement under national legislation.	Whilst the routes of the transmission lines have been identified, there is an opportunity to conduct a site-specific assessment of each transmission line pylon, with the aim of avoiding/minimising adverse impacts to the extent possible, in accordance with the mitigation hierarchy.
Categories of displaced persons	All displaced persons or Project Affected Persons (PAPs) are eligible for certain types of mitigation measures. They may be classified as: a. Persons with formal legal rights to land or assets (including customary and traditional rights recognised under national laws); b. Persons who do not have formal legal rights to land and/or assets, but who have claims to land or assets that are recognised or recognisable under national laws or customary and traditional rights; c. Persons who occupy/use the land and/or assets but have no recognisable legal rights or claim to it/them.	National legislation recognises Category 1 and 2 displaced persons through the holders of formal title deeds, property holdings recognised by community leaders, and the collective ownership of land recognised by the regional councils. National legislation does not recognise Category 3 of displaced persons.	The resettlement principles recognise the potential presence of all 3 categories of displaced persons, who are eligible for compensation and other assistance in accordance with the eligibility and entitlement matrix.
Census	The promoter shall conduct a census and a socioeconomic baseline survey to identify all PAPs who will be physically or economically displaced and eligible for compensation and/or assistance	This type of formal process is not a requirement under national legislation although details of the displaced persons who have ownership rights recognised by law, is compiled during an expropriation process.	The LARF describes the process to be used to conduct a future census and socio-economic survey of the displaced persons, linked to the establishment of a cut-off date (see below).
Socioeconomic baseline survey	The socioeconomic baseline survey shall include: (i) the current socioeconomic profile of the PAPs; (ii) an assessment of vulnerability and the need for special arrangements to be made; and (iii) degrees, types and nature of impacts. Data shall be disaggregated by gender and other relevant parameters. In addition, the socioeconomic baseline survey may require intra-household analyses in cases where the livelihoods of different members in a household (e.g. women and men) are affected differently.		

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
Cut-off date for eligibility	In conjunction with the census, the promoter shall establish a cut-off date for eligibility. The cutoff shall be well documented and effectively disseminated throughout the project area	A cut-off date is not included in national legislation although the valuation report prepared for the assets provides a dated record as to when the valuation was conducted, and details of the assets subjected to expropriation. The cut-off will be published and clearly communicated to the public in the governorates through publication in the Official Journal, paper posters being installed at the governorate headquarters, and individual notifications will be made in writing, to the owners of impacted assets.	A cut-off date will be set based upon the final day of the census update and verification fieldwork, whichever is the latest. The purpose and actual date of the cut-off date, will be publicly disclosed to the displaced persons and relevant government representatives, including local communities in the manner described here. An acknowledgement form will be used to ensure that each representative of a displaced household has received details of the cut-off date during the census update and verification fieldwork.
Compensation choices for cash and/or in-kind	Whenever feasible, the promoter shall offer all PAPs an informed choice of either compensation in kind (land-for-land; house-for-house; shop-for-shop) or monetary compensation at full replacement cost. The promoter shall respect the choice stated by the PAPs.	Under Tunisian law, monetary compensation is provided for loss of crops, whilst the loss of land acquired is addressed through either in-kind provision of state land, or cash compensation. However, in this project no land is being acquired.	Private landowners will be compensated for their loss of land from installation of a OHTL pylon through a one-off payment in cash, or in-kind replacement land (whenever feasible) where a loss of livelihood occurs.
Entitlements to PAPs who experience physical displacement	In cases of physical displacement: a. Where alternative housing is offered, the new residence's value should be equal to or higher than prior-project conditions, with equivalent or better characteristics, advantages and location. For PAPs under paragraph 18 (c), the promoter shall provide arrangements to allow them to obtain adequate housing and pursue security of tenure; b. Where cash compensation is offered, the valuation of all affected assets shall be at the full replacement cost; c. Where tenants are being displaced, arrangements shall be put in place to help them secure alternative housing.	Compensation for the loss/damage to assets is valued according to their market price.	Compensation for all assets lost will be calculated using the full replacement cost, which includes any administrative costs and fees which may apply and excludes depreciation of any structures. The valuation process is presented in the LARF and will be applied during preparation of the LALRP.

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
Entitlements to PAPs who experience economic displacement	In cases of economic displacement: a. Replacement land shall be of equivalent or higher quality and situated as close as possible to the original location or to the current place of residence; b. Where a community's commonly held resources are affected, measures shall be implemented to allow continued access to the affected resources or to provide access to equivalent resources, also taking cultural aspects associated with such common resources into consideration where relevant. When this is not possible, the promoter shall provide sufficient justification to the EIB as to why not and provide assistance to offset the loss of access to the lost resources or the lack of access to alternative sources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access and/or in-kind/cash compensation; c. In the case of cash compensation for all affected assets (including crops, irrigation infrastructure and other improvements made to the land), the valuation shall be at full replacement cost; d. In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected shall also be provided with targeted assistance and transitional support to at least restore their livelihoods. The transitional support can consist of cash, job opportunities, training, legal assistance or other forms of support. It shall be determined in consultation with the PAPs e. In cases of commercial structures, the compensation of the affected business-owner shall also consider the cost of re-establishing commercial activities elsewhere, and the cost of transferring and reinstalling any equipment, as applicable. Affected employees shall receive assistance for temporary loss of wages and, if necessary, assistance in identifying alternative employment opportunities.	National legislation provides cash compensation for all assets at market price and does not require replacement land to be offered as a resettlement choice. Communal resources are not included specifically in national legislation and there are no provisions stated. The provision of support to displaced persons to restore/improve their livelihoods and standards of living is not required under national legislation, and there are no specific provisions for commercial structures apart from compensation for the loss of formally held assets.	The LARF describes the way in which displaced persons will be offered a choice of replacement land (whenever feasible and where a loss of livelihood takes place), how communal assets are to be compensated (if impacted), includes a commitment to value all assets at full replacement cost and provide displaced persons with assistance measures to help restore/improve land-based livelihoods and standards of living in the shortest time possible. This includes support to commercial businesses.

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
Provision of resettlement assistance	As required, the promoter shall also provide resettlement assistance suited to the needs of each group of displaced persons, paying particular attention to vulnerable PAPs and/or groups. Resettlement assistance can consist of legal assistance, moving allowances, psychological and social counselling, or other forms of support. It shall be determined in consultation with the PAPs	National legislation does not require resettlement assistance measures to be provided.	The LARF includes a commitment to provide resettlement assistance measures to the displaced persons, which are to be defined using an engagement-led approach.
Timing of cash compensation	In the case of cash compensation, the promoter shall make the payment before the actual resettlement takes place in order to allow PAPs to find a suitable replacement.	Compensation for land and damages to crops should be paid before the actual loss occurs.	Compensation will be provided before resettlement impacts such as displacement or imposition of restrictions occur.
Gender inclusion in compensation payments	Where feasible, in-kind or cash compensation shall be issued in the name of both the head of the household and his/her partner	National legislation does not require compensation to be provided jointly, just to be legally recognised owner. Women are able to hold and transfer land rights.	The LARF includes a commitment to provide compensation equally available to both spouses, as well as measures to restore standards of living. Cash compensation will be paid either 50/50 between the adult male and female in married displaced households, or into a joint bank account if both spouses agree.
Stakeholder engagement	The promoter shall identify and meaningfully engage in a transparent manner with all PAPs, both men and women, host communities and other relevant stakeholders regularly throughout Land Acquisition and Livelihood Restoration Planning, implementation, monitoring and evaluation. In that respect, the promoter shall comply with the requirements for stakeholder engagement and disclosure of information outlined in Standard 2, and document the process.	This is not a requirement under national legislation. During the expropriation procedure, details of the assets which are to be acquired and their value is provided to the displaced person.	This LARF contains details of the process to be used for displaced persons to be given the opportunity to participate in defining their entitlement choices, negotiation of the compensation packages, and resettlement assistance. Consultations with the displaced persons will continue during the implementation, monitoring and evaluation of compensation payment and resettlement outcomes.
Information disclosure	The promoter shall inform PAPs about their options and rights pertaining to resettlement. The promoter shall disclose all relevant information (including planning documents referred to in paragraph 56) in a timely and context-specific manner, in an accessible place, in a form and language(s) understandable to all PAPs. Special attention should be taken in cases of illiteracy or		The LARF describes the way in which displaced persons will be provided

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
	where education differs according to age, gender or economic status. Compensation and resettlement understandings reached by the Promoter with affected parties should be reflected in written agreements.		with details of the key components of the LALRP, and what to expect at various stages during implementation.
Grievance mechanism	The promoter shall establish a grievance mechanism consistent with the requirements set out in Standard 2 as early as possible. The mechanism shall be socially appropriate and readily accessible, regardless of gender or any other socioeconomic characteristics.	Displaced persons are able to raise a grievance to the Reconciliation Commission and, if this approach fails to reach agreement, the judicial court process.	The LARF includes details of SCATEC's grievance mechanism which aims to record grievances raised during preparation and implementation of the LALRP and resolve grievances as soon as possible but allowing for an appeals procedure if the initial decision on the grievance is not acceptable to the complainant. The aim is to avoid recourse to judicial or administrative processes, as this could lead to significant delays. However, the grievance mechanism recognises that a complainant has a right to legal/administrative recourse if he/she is not satisfied with the final decision arising from application of the grievance mechanism.
Vulnerable groups and gender dimensions	During the resettlement consultation, planning and implementation process, the promoter shall give special consideration to individuals and groups that are vulnerable, marginalised, systematically discriminated against or excluded on the basis of their socioeconomic characteristics.	This is not a requirement under national legislation.	The LARF includes an eligibility and entitlement matrix presenting measures to provide support to restore/improve displaced persons standard of living/livelihood, and to provide additional assistance to vulnerable people.
Requirements to ensure the active inclusion of women	The promoter shall pay attention to the specific gender dimensions of involuntary resettlement, especially regarding stakeholder engagement, the census, valuations, payment of compensation and livelihood restoration. The promoter shall put in place specific	This is not a requirement under national legislation.	The LARF principles include a commitment to pay attention to the specific gender dimensions of involuntary resettlement and specific

Topic	EIB policy requirements	Provisions of the Constitution of the Republic of Tunisia and national legislation	Steps to be taken to address the gaps identified
	measures as necessary so that women's perspectives and interests are considered in all aspects of Land Acquisition and Livelihood Restoration Planning and implementation. The promoter shall consider feasible measures for women to gain security of tenure and receive cash or in-kind compensation on equal terms as men.		measures will be implemented as necessary to address gender risks, ensuring that women take part in the development of the LALRP and are adequately informed of the resettlement assistance measures and choices made available to them.

The outcome of the gap analysis indicates that there are the following key differences between national legislation and ESR5 and EIB Standard 6:

- National legislation does not require a process of negotiated settlements to be used to obtain access to privately owned assets, which shall be applied during the process used to identify the final pylon locations.
- Displaced persons shall be engaged with during preparation of the LARF, the LALRP, and during implementation to ensure that they are informed of their eligibility and entitlements, resettlement assistance measures, the grievance mechanism, and ongoing need for monitoring and evaluation activities/surveys. This is not a requirement under national legislation.
- Under national legislation there is no requirement to provide additional support to vulnerable people or pay attention to gender dynamics.
- A socio-economic survey/assessment and census shall be undertaken on displaced persons, to allow a pre-and post-displacement comparison to be undertaken, in the form of a LALRP Completion Audit.
- Compensation for all assets lost shall be calculated using the principle of full replacement cost, where the physical depreciation of the asset is not taken into consideration. National legislation requires all assets to be valued at market price which does take into consideration depreciation of structural assets.
- Under national legislation only cash is an option, whereas under ESR5 and EIB Standard 6 in-kind compensation for land is preferred where a loss of livelihood takes place. In-kind land compensation where OHTL pylons are to be located will be offered where a loss of livelihood occurs, to the extent that this is feasible and a adjacent (or nearby) willing landowner can be identified.
- National legislation does not require livelihood restoration measures to be provided to the displaced persons, with the aim of assisting them to restore/improve, their livelihoods and standards of living. This is required by Lenders.
- National legislation does not require a monitoring and evaluation framework to be used to track the process of implementation of LALRP. This is required by Lenders.
- National legislation does not require a specific process to be implemented that manages grievances arising from resettlement-related actions. A grievance mechanism shall be established and used to record and resolve grievances, relating to the Project and resettlement impacts, in the shortest time possible. Application of the grievance mechanism shall not preclude complainants' recourse to judicial or administrative procedures to resolve grievances.
- Some resettlement requirements are not covered by national legislation. People without formal property rights and legal land tenure documents (e.g. squatters) are not eligible for compensation or resettlement assistance.
- Tunisian law does not provide for the identification of vulnerable groups and their needs. There are no legislative requirements for the provision of additional assistance to vulnerable groups. This is required by Lenders.

4 PRINCIPLES, OBJECTIVES, AND PROCESSES

4.1 RESETTLEMENT PRINCIPLES AND COMMITMENTS

The purpose of this section is to describe the resettlement principles, objectives, and processes that are to be applied to the Project. The resettlement principles are listed below:

- No forced eviction shall take place under any circumstances.
- All land-related activities shall be undertaken in accordance with national legislation, ESR 5 and ESR 10, and EIB Standard 6. Where there are differences in standards between national legislation and EBRD/EIB requirements, the ‘higher’ standard will be adopted.
- The following categories of displaced persons shall be recognised:
 - Category 1: those who have formal legal rights to the land (including customary and traditional rights recognised under national laws).
 - Category 2: those who do not have formal legal rights to land at the time of the census but who have a claim to land that is recognised or recognisable under national laws.
 - Category 3: those who have no recognisable legal right or claim to the land they occupy, including seasonal resource users such as herders/fishing families, hunter and gatherers who may have interdependent economic relations with communities located within the project area.
- A cut-off date shall be established and defined as the last day of the census and asset survey. The purpose of the cut-off date shall be explained to displaced persons and other stakeholders so that they are aware that those who have made land-related improvements after this date shall not be eligible for compensation, also, that others cannot be categorised as displaced persons by claiming their land/property-related have been impacted by the Project’s changes in assessing land. The cut-off date shall be effectively disclosed publicly.
- Where restrictions to accessing land or using land, result in small, uneconomic parcels of land being created, the landowner shall be offered the choice of the entire land parcel being compensated for.
- All displaced persons, including vulnerable people, shall be informed and consulted on during preparation of the LALRP, and this consultation shall continue during implementation of the Plan.
- Information on the resettlement process and content of the LALRP shall be provided to displaced persons and other stakeholders in a culturally appropriate manner, to both adult members of the household where assets are under joint ownership. Additional measures shall be taken to ensure that women and vulnerable people are adequately informed about the resettlement process.
- An effective grievance mechanism shall be established to receive and address, in a timely fashion, resettlement-related raised by displaced persons and other stakeholders. This mechanism will be used during preparation and implementation of the LALRP.
- Negotiation will be used to acquire land rights to the extent possible. All negotiations will be carefully documented.
- The owners or users of land plots temporarily occupied during the construction stage of the Project (if required) will be compensated in accordance with the valuation methodology presented in the LARF.
- Compensation for all affected assets will be provided at full replacement cost as defined in the LARF.
- The imposition of involuntary access restrictions upon land, shall only take place after compensation has been provided and the provision of livelihood restoration measure and transitional support is underway.

- The standards of living and the livelihoods of displaced persons will be restored, or to the extent possible, improved, in the shortest time possible.
- All livelihood restoration and standard of living improvement measures will be provided equally to men and women, with a range of measures specifically targeting the restoration of women's livelihood conditions and standards of living.
- Specific assistance measures shall be provided to vulnerable displaced persons during the resettlement implementation process, with the aim of ensuring that they are not disproportionately impacted by resettlement.
- The implementation of the LALRP will be carefully monitored through internal monitoring and regular (i.e. every month) during implementation. At the completion of land acquisition and compensation, the developer will audit the implementation of the LALRP and share with lenders the internal completion report. At all monitoring/evaluation stages, corrective actions will be recorded, addressed, and tracked until the corrective action is resolved, with the aim of improving the way in which the LALRP is implemented over time.
- In cases where there is more than one owner of assets that are to be impacted (i.e., a couple in a legal or other form of union that is legally recognised), cash compensation will be divided equally and paid to the bank accounts they specify, or into a single joint account they both have access to, or in a different way that is agreed by all parties.

4.2 *PROCESS OVERVIEW*

4.2.1 **Negotiated settlements**

To date, negotiations have been completed with the 10 landowners for the Solar PV Park and in-principal agreements have been signed. Involuntary displacement to informal land is addressed in this LARF.

After the NOCs have been obtained for the OHTL route, SCATEC will start engaging with landowners to discuss the optimum positioning of the pylon within individual land plot. The process to be used for this negotiation is summarised below:

1. SCATEC to inform the delegate of Mazzouna and the local community leaders of Khobna that the routing of the OHTL pylons is underway and the process that is to be used to identify their optimal location. Large maps will be used to provide a zoomed-in picture of the land along the OHTL route and land boundaries (to the extent available) will be added, along with other features such as local roads and settlements, using a Google Earth basemap.
2. SCATEC will subsequently engage with landowners individually at first, to negotiate access to the land where the EPC Contractor has provisionally located a pylon. The negotiation process will commence with the following information being provided:
 - The purpose of the project and SCATEC's grievance mechanism.
 - The need for OHTL pylons to be located at regular intervals along the OHTL.
 - The construction and permanent footprint of each pylon, and the time required for construction to take place.
 - Details of the potential need to establish a temporary access road to the pylon which may impact additional areas of land, and potentially adjacent landowners.
 - SCATEC's offer of a one-time payment in cash for permission to locate an OHTL pylon on their land (or an alternative plot of land where this is possible to do so), including:
 - The fact that they can refuse the offer and, if they do, then SCATEC will seek agreement with another landowner at an alternative location to the extent possible. If an alternative

location cannot be identified using a willing landowner, then SCATEC (via STEG) can use the Presidential Decree of 30 May 1922 to resort to legal proceedings that essentially forces a landowner to accept a pylon on their land.

- Details of the long-term height restrictions along the OHTL route which reflect national regulatory requirements which must be complied with whereby landowners may be restricted in the future as to the type of trees and tall vegetation is planted.
- That if they agree then legal documents will be drawn up for their signature. Legal assistance will be provided to them (free of charge) by SCATEC to advise them on the content of the agreement if they have specific questions or need help understanding the content.

For state-owned land, STEG enters into formal agreements with the respective government entities owning or managing the land. Payments or fees are made in accordance with the terms of these agreements and applicable national regulations.

4.2.2 Process in case no agreement is reached whereby requirements from ESR5 and ESS6 will be applied

If no agreement is reached, then SCATEC will request STEG to use the provisions of the Presidential Decree of 30 May 1922 seek to force the landowner to accept a pylon or an access road on their land and rights of way for reasons of public interest, which will mean that the resettlement and compensation strategy described in section 5 will then apply fully.

5 TENTATIVE RESETTLEMENT AND COMPENSATION STRATEGY

5.1 FIRST APPROACH TO ENTITLEMENTS

5.1.1 Eligibility to Compensation

The eligibility to compensation will be determined during the census, asset and inventory surveys. Based upon the expected type of impacts that are likely to occur the eligible displaced persons are estimated as follows, which will be clarified in the LARLP:

- The herder and his 2 workers grazing livestock inside the Solar PV Site;
- x19 private landowners impacted by the construction of an OHTL pylon on their land
- The herder who is known to informally use state-owned land for grazing livestock to the south of the OHTL; and
- The owners of tall trees and vegetation that is below the OHTL wires which must be cut within applicable distance limits to maintain public safety.

5.1.2 Entitlement Matrix

A proposed entitlement matrix is provided in Table 4 -. This includes various types of losses for completeness, although the only expected involuntary loss expected to occur is of grazing areas and any tall trees/vegetation that grows below the OTHL wires that must be removed.

Table 4 - Proposed entitlements matrix

Type of Entitlement	Project Impact	Category of displaced person	Entitlements
The involuntary loss of access to land	Permanent occupation of land where pylons are present	Titled or customary landowner (Category 1 and 2)	• Payment in cash of a one-time fee that reflects the full replacement cost of the land, or in-kind where this is possible and a willing adjacent (or nearby) landowner can be identified and where a loss of livelihood occurs.
	Temporary occupation of land surrounding a pylon for construction or access roads	Titled or customary landowner (Category 1 and 2)	• To be included in the payment of a one-time fee (above). No change in land ownership.
The involuntary loss of access to grazing land	Involuntary restrictions to accessing land	Informal land user (Category 3) - herders	• Assistance to identify alternative land that can be used for the grazing of livestock and obtaining formal approval to use this land. • Livelihood restoration measures.
		Informal land user (Category 3) – workers of the herders	• Livelihood restoration measures.
Loss of crops/trees from expected or unexpected damage	Seasonal or perennial crops (fruit trees and perennial plants)	Crop owner	• Cash compensation based upon the market value of the crops (at harvest time), and the ability to harvest crops even if they are to be compensated for; and the loss of crops until a replacement crop can match the existing production of the asset (typically 5 years). • Livelihood restoration measures.
	Tall trees	Tree owner	• Cash compensation based upon the market value of the trees. • Livelihood restoration measures.
Loss of assets and/or restriction on access to assets owned or used by vulnerable people	Impacts to displaced persons who are vulnerable	Displaced persons that meet the vulnerability criteria	• Specific assistance measures to be provided which are agreed on a case-by-case basis that aim to reflect the specific source of vulnerability.

Type of Entitlement	Project Impact	Category of displaced person	Entitlements
Loss of the Majel (water feature)	The permanent loss of the water feature from the construction works within the Solar PV site.	Private owner of the feature (landowner 1)	In-kind replacement of the water feature within the same land plot, with the aim of improving the volume/functionality of the water collection device to the extent possible.

5.2 VALUATION OF AFFECTED ASSETS

For the one-off payment fee to landowners where an OHTL pylon is to be situated, the value will be determined using a government registered valuer who will use the following methodology and principles related to land valuation:

1. The valuer will categorize agricultural land affected by the Project, considering aspects type (arable or pasture), irrigation status (irrigated or dry), topographical features (steep slope or little to no slope), and ease of access.
2. The valuer will identify recent reference transactions in the same region if these are available. This will include an analysis of the transaction costs, which entails the registration cost and any additional taxes, fees, rights, etc., on top of the land value.
3. A unit price per m² area of land will be defined and then applied consistently as possible across the OHTL route, whilst taking into considerations that some individual land plots may attract a higher unit value relative to others due to specific features.

The valuer will follow the following methodology and principles related to the valuation of seasonal crops and perennial crops (trees):

1. The valuer will compile an inventory of annual and perennial crops at the pylon location.
2. The valuer will conduct a survey of the current market prices and potential yields for each identified crop.
3. The valuer will determine the market values of produce per unit of weight or volume, along with the yields in weight or volume per square meter, based on this survey's results.
4. Specifically for perennial crops, the valuer will also collect information on typical growth periods and how yields evolve with the age of the crops.

There are no community facilities, utilities or public amenities, or cultural assets (graves, cultural sites, etc.) that are to be impacted by the Project. For landowner 1, there is a single Majel (water feature) which is owned by landowner 1. As the landowner has provided the land under a “willing lessor, willing lessor” arrangement for the Solar PV Site there is no need for the owner to be compensated. The Majel is part of the land which has been leased to SCATEC and the lease agreement does not include any mention of compensation for features on the land. However, the landowner may not have had the full knowledge that the Majel would either be impacted by construction work, or become inaccessible due to the presence of the perimeter fences. As per the consultation conducted with Landowner 1, who is considered a vulnerable person (aged over 65), he confirmed that he is the only user of the Majel, which he frequently uses to meet his domestic needs. It was also emphasized that the Majel was restored approximately five years ago and remains in active use. It is recommended either to maintain access to the existing Majel, provide adequate compensation, or construct an alternative Majel near the landowner’s residence.

5.3 CASH AND IN-KIND COMPENSATION

The loss of access to land where the OHTL pylons are to be located will be compensated through the provision of a one-off cash payment, made to the landowner (payment to by cheque only and not in hand-held cash bank notes), unless in-kind land compensation is being offered (this will be offered where a loss of livelihood occurs).

The loss of access to herders grazing livestock will be compensated through the provision livelihood restoration measures (see Section 6) which aims to restore/improve land-based livelihoods in the shortest time possible. These measures shall be offered equally to both men and

women in the displaced households, with a range of measures specifically designed to improve livelihoods and the standard of living of women. The measures adopted shall be specific, measurable, achievable, realistic, and time-bound so that there is a pre-defined entry and exit point for each measure. Should any described above process continue for a significant period of time and cannot be fully executed before construction, the calculated compensation amount as per the resettlement matrix, shall be kept in an escrow account until paid to the eligible party.

The measures themselves shall be identified through engagement with displaced persons during preparation of the LALRP and developed using an engagement-led approach which includes:

- Individual meetings with adult males of displaced households;
- Individual meetings with adult females of displaced households; and
- Collective meetings to discuss options as a group amongst the representatives, which will be used if representatives from several displaced people are willing to get together.

6 LIVELIHOOD RESTORATION AND IMPROVEMENT

6.1 PRINCIPLES

The following principles apply to the provision of livelihood restoration and improvement measures:

- All eligible persons will be provided with livelihood restoration and improvement measures and an individual/households' eligibility will be determined during the census.
- A range of specific livelihood restoration and improvement measures will be targeted to the adult females of displaced households.
- All livelihood restoration and improvement measures shall be carefully designed using an engagement-led approach, and their implementation monitored to ensure that they are effective, making adjustments where necessary.
- All livelihood restoration and improvement measures will be provided in-kind (see below) and cash will not be offered as an alternative.

6.2 RESTORATION AND IMPROVEMENT OF LAND-BASED LIVELIHOODS

As stated above, the actual measures provided will be designed using an engagement-led approach which includes coordination with the Government Office of Livestock and Pastures. The measures may include the following:

- Support the installation or rehabilitation of water points (Majel, cisterns) for livestock watering.
- Technical training in livestock veterinary management.
- The practical provision of advice to ensure that alternative grazing areas are suitable, do not result in conflicts with other landowners/land users, and assistance to help them formalise their arrangements with relevant landowners.

6.3 TRAINING

All of the livelihood restoration and improvement measures will be accompanied by training using Arabic and local specialists who understand the environmental and social dynamics of the region.

6.4 SPECIFIC ASPECTS RELATED TO GENDER

The LALRP will include specific livelihood restoration and improvement measures that are designed to enhance the status of adult women in displaced households. These will be designed through direct engagement with the women and may include the provision of training on various topics including gender empowerment, entrepreneurship, food safety and nutrition, and others. As above, this will be developed using an engagement-led approach.

1.1 SPECIFIC ASPECTS RELATED TO VULNERABILITY

The results of the socio-economic baseline survey will be used to conduct a vulnerability analysis, which is a process that moves from the raw socio-economic data to identification of individual persons or groups among the displaced persons that meet the pre-determined vulnerability criteria. The LALRP will include specific economic restoration and standard of living improvement measures that are designed to enhance the status of vulnerable people. These will be designed through direct engagement with vulnerable people in displaced person households. The specific measures related to vulnerability will need to reflect the specific needs of the actual persons and may include, for example, the provision of practical support to improve mobility inside their home, additional engagements to maintain wellbeing and reduce stress during the negotiation process, and other measures defined on a case-by-basis.

1.2 PARTNERSHIPS AND LINKAGES FOR PLANNING AND IMPLEMENTATION OF LIVELIHOOD RESTORATION AND IMPROVEMENT

It is possible that the provision of livelihood restoration and improvement measures can be delivered through the government entity, and this will be explored during development of the LALRP.

7 CONSULTATION AND DISCLOSURE

The purpose of this section is to describe the consultation and information disclosure activities that were undertaken during preparation of the LARF and indicate the additional steps that are to be taken during development of the LALRP.

1.3 MAIN RESULTS OF CONSULTATION CARRIED OUT FOR PREPARING THE RESETTLEMENT FRAMEWORK

During development of the LARF, the following engagements were undertaken:

Stakeholder Name	Date and format
x10 engagements with the landowners who own land to be used for the Solar PV Site.	Telephone interview completed during August 2025
Omda of Khobna	Telephone interview completed on August 4 th , 2025
Director of OTC (<i>Office de la Topographie et du Cadastre</i> - government cadastral office) for Sidi Bouzid.	Telephone interview completed on August 25 th , 2025
Engagements with x6 private landowners along the OHTL.	Telephone interview completed during September 2025

Copies of the stakeholder engagement record are provided in **Appendix A**.

A summary of the key outcomes with each stakeholder is provided below:

Engagement with landowners of the solar PV site

- All of the landowners have private land title.
- Landowners vary in how often they visit their land, with most visiting it every month and others visiting once a year.
- All of the landowners stated that they do not use their land. Historically back in the 1960s-70s some of the land was used for agriculture and grazing although this is no longer the case due to drought and poor soil quality as it is rich in gypsum. Only one landowner reported having previously cultivated field crops for household consumption during the rainy season of 2024.
- One of the landowners used to have 42 sheep although these were all stolen four years ago and his livestock has not been replaced.
- Out of the 10 landowners engaged with, just 1 allows other people to use their land which for a single herder grazing livestock (the identify of this herder is known to the landowner and EAM).
- In relation to the informal use of land, the landowners stated that they have not seen any people using their land for grazing or other activity, with the exception of the single herder stated above.
- All landowners stated that the male head of the household makes the decisions associated with the land, including the decision to use the land for the Solar PV site.
- Four of the landowners stated that their land is important to their cultural identify. Their land is not currently important to their income as it is not currently being used and is “*abandoned due to poor soil and drought*”.
- Out of the 10 landowners engaged with, 2 of them stated that they have vulnerable people inside their household: an elderly person over 80 who lacks access to adequate healthcare resources near their home, and a second household with two adults where one has a physical disability, and the other a mental disability.

Engagement with the Omda of Khobna

- The Omda of Khobna confirmed that land parcels in the Solar PV Site have known owners and private legal status.

- For the OHTL,
- all land parcels in the area have known owners and proper legal status, except for two plots that are not titled and are part of state-owned land.
- There is a herder who grazes livestock (300 sheep) in the open areas at the southern part of the line and on adjacent lands. He rents a house near the OHTL (about 700 m) where he lives with his family. His grazing activities are seasonal and depend on rainfall.
- The Omda concluded by stating that the lands under the OHTL have not been used for agriculture for over 15 years, mainly due to prolonged drought, apart from where the olive and almond trees are present.

Engagement with the Director of OTC

Approximately 80% of the land in the community of Khobna is formally titled. For the remaining untitled land parcels where ownership is claimed by a private individual, two pathways are possible to register this land as private land title:

1. **OTC initiated process:** OTC may carry out cadastral surveys to complete the registration of untitled parcels as part of systematic land regularization programs.
2. **Owner initiated process:** Individual landholders may submit a registration application to the Land Court, supported by topographic surveys and validation through a site visit with local authorities (*Omda*), adjacent landowners to clarify ownership and enable the individual to obtain formal title deeds.

When a person requests the Property Court to register their land, the OTC carries out a TBD (Travaux Particuliers Divers – Special Works) in order to determine whether the land belongs to the State or is subject to dispute, followed by a cadastral survey. In such cases, an investigation is conducted, which usually lasts about three months. If the land is recognized and registered, the procedure is straightforward. Otherwise, the applicant must proceed with the registration by submitting either a certificate of ownership or the testimony of four witnesses, and by paying the required fees to the Property Court and for publication in the JORT. The validation is then carried out by the OTC after approximately nine months. Ultimately, it is the Property Court that decides whether the land belongs to the State or to a private owner.

In relation to the Solar PV Site, the land boundaries have been recorded by OTC through a cadastral survey which was subsequently registered with the Property Court and published in the Official Journal. The landowners were present during this survey to address the risk of boundary disputes and none were recorded. Boundary disputes are common and they are referred to the OTC and forwarded on to the Property Court. The cadastral survey has a 0.5% accuracy level and so is very accurate. Once the land title is registered then it is not possible (in legal principle) for a second person to claim the ownership of the same plot of land, although this still does rarely occur due to fraudulent or out of date documents. In such circumstances, the details are passed onto the Property Court.

Engagement with x6 landowners along the OHTL

- All of the landowners were supportive of the Project and some requested employment, others stated that the compensation provided must be fair and equitable. Many of the landowners recognised the national importance to the country from the project.
- None of the landowners engaged with had tall trees or vegetation. The land was instead used for grazing or seasonal crops such as wheat, etc. which is not tall.
- Out of the 6 landowners, four use their land for seasonal crops, with the others using it for grazing only (x2), and the remaining 2 for both seasonal crops and grazing.
- Only x2 of the landowners lease part of their land to other farmers, the rest do not.
- Out of the 6 landowners, x4 provided details of their livestock which ranges from 10 to 350 reflecting the fact that the herders of animals are different sizes.
- Many of the landowner's neighbours grow tall trees such as olive trees.

- The landowners raised concerns about the need for all damage and impacts to other assets to be compensated fairly, particularly where their land is being reduced in size.

1.4 ENGAGEMENT PLAN FOR FURTHER STAGES AND DISCLOSURE

In accordance with the SEP, additional engagements with displaced persons and their households will occur during development of the LALRP. This will include the following:

- A formal meeting with the delegation of Mezzouna and Khobna to discuss the status of the project, raise awareness of the grievance mechanism, and the need for land along the OHTL route where pylons are to be located;
- Face-to-face meeting during the census, asset inventory, and socio-economic baseline survey with adult men and women (separately) to gather information and identify suitable livelihood restoration and improvement measures;
- Group meetings (if appropriate) to discuss the provision of livelihood restoration and improvement measures between adult men and women (in separate groups, not mixed gender groups); and
- Additional meetings with state departments to discuss the provision of livelihood restoration and improvement measures.

Once the draft LALRP has been prepared, the following content will be provided to the displaced persons through as formal disclosure stage:

- Details of the grievance mechanism;
- The fact that SCATEC is undergoing a process of negotiation and, if these fail, STEG have the legal right to force the landowner to have a pylon placed on their land;
- The location of the pylons, the area of land temporarily required for installation of the pylon, how construction vehicles are to access each pylon location using the connection from the nearest public road, and how long construction works are likely to take.
- The location in-between the pylons where long-term land use restrictions will be implemented, to protect the physical integrity of the wires, and the maximum acceptable height of trees/vegetation.
- Details of the future surveys that are to be undertaken during preparation of the LALRP (the census, asset and inventory survey, the cadastral survey, and baseline socio-economic survey) including the purpose of these surveys and how data is to be protected to ensure the confidentiality of personnel data;
- Details of the displaced person's rights under national legislation and the key requirements from EBRD/EIB;
- The method of valuation, the valuation of individual assets and unit rates that have been applied;
- The eligibility and entitlements matrix and compensation options for the loss of assets;
- Examples of the type of livelihood restoration measures which could be provided to displaced persons, that reflects their land-based livelihood and other economic activities;
- The commitment to support vulnerable people during preparation and implementation of the LALRP;
- The need for future monitoring and evaluation activities, including the use of a Completion Audit to be undertaken internally by SCATEC.

1.5 CONFIDENTIALITY ARRANGEMENTS

In relation to the confidentiality of the data collected by the surveys completed during preparation of the LALRP, data that is confidential and contains personal information on health, income, and vulnerability status (for example), shall be stored securely, and data shall be restricted to those individuals who are involved in the surveys and engagements completed during preparation of the

Land Acquisition and Livelihood Restoration Plan.

All individuals involved in the surveys shall be asked to sign a confidentiality agreement prior to their involvement in the Project, to ensure their adherence to the controls above.

All personal data electronically stored (such as completed survey forms, photos, databases containing the outcome of the asset and inventory surveys, etc.), shall be password protected, and deleted from individual users' personal computers (desktops and laptops) after the storage of data is no longer necessary. Details of displaced persons that are presented in the LALRP shall be anonymised so that individual's names and personal details are not included.

8 GRIEVANCE MANAGEMENT AND REDRESS SYSTEM

The purpose of this section is to describe the independent appeal mechanisms that will be managed by the developer with the active participation of other entities, if necessary. In accordance with EPR1 and EIB Standard 2, the Developer has established an effective project-level grievance mechanism to receive and facilitate redress for concerns and grievances of stakeholders throughout the project cycle. This mechanism covers all Project E&S aspects except for employer-workforce relations including occupational health, safety and security aspects, as a separate grievance structure is dedicated to this purpose in line with requirements in EIB Standards 8 and 9.

The grievance mechanism sets out a clear step-by-step process with indicative timeframes, outcomes, defined monitoring and performance indicators, and reporting requirements.

1.6 KEY PRINCIPLES

The key principles of the Grievance Redress Mechanism (GRM) are to:

- Ensure that it is available and that women and vulnerable people are willing and able to access the mechanism, should they wish to do so, for any reason, including Project-related grievances associated with GBVH. The GRM includes multiple channels through which complaints can be registered in a safe and confidential manner.
- Respond quickly and effectively to concerns in a transparent and culturally appropriate manner, without manipulation, interference, coercion, intimidation, or retribution, and will be easily accessible to all parties concerned, free of charge.
- To not prevent access to judicial or administrative remedies.
- To allow anonymous complaints to be filed and processed.
- To monitor use of the GRM over time and to identify trends so that the environmental and social performance of the project improves over time.
- To ensure that all information recorded remains confidential.
- To ensure that there are no reprisal actions taken against those who raise grievances, especially those associated with GBVH where there are heightened risks of stigmatization, rejection and reprisals against survivors, creating and reinforcing a culture of silence so survivors may be reticent to approach the project directly.

The scope of the grievance mechanism covers the entire project, including the actions of the EPC Contractor and their sub-contractors. 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.

Disclosure

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

- Using printed information which is included in the Project Information Leaflet;
- Using the Grievance Mechanism leaflet;
- Including the details in a sign at the front of the Project site;
- By verbally mentioning the Grievance mechanism during stakeholder engagement activities and through the Developer's CLOs, including women-only engagements with community leaders and local residents.

Recording and logging grievances

All complaints shall be considered and acknowledged.

All complaints shall be considered and acknowledged.

To contact SCATEC please use the contact details provided below:

By post to the following address: 24 rue du Lac Tanganyika, Les Berges du Lac 1, 1053 La Marsa, Tunis, Tunisia.

- by e-mail (moez.bahloul@scatec.com)
- Telephone call SCATEC E&S Project Manager: Moez Bahloul (+216) 98 157 018.
Male CLO contact: Mhadheb Messaadi (+216) 98 157 015

The grievance shall be recorded using the electronic grievance log and paper record form (refer to SEP), noting the following information:

- 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 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 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.

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 SCATEC 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 grievant (complainant) will be provided by SCATEC, which may include temporary housing and other actions to prevent future harm. Relevant stakeholders (such as women leaders in Khobna community and the Tunisia Association of the Tunisian Red Crescent will be requested to provide additional support, so that all of the actions SCATEC 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 grievant (complainant) should be stored in the GRM and information apart from the three aspects related to the GBV incident will be recorded:

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

The GRM will refer GBVH complaints to the Tunisian Red Crescent and record the resolution of the complaint process.

Grievance investigation and attempt at resolution

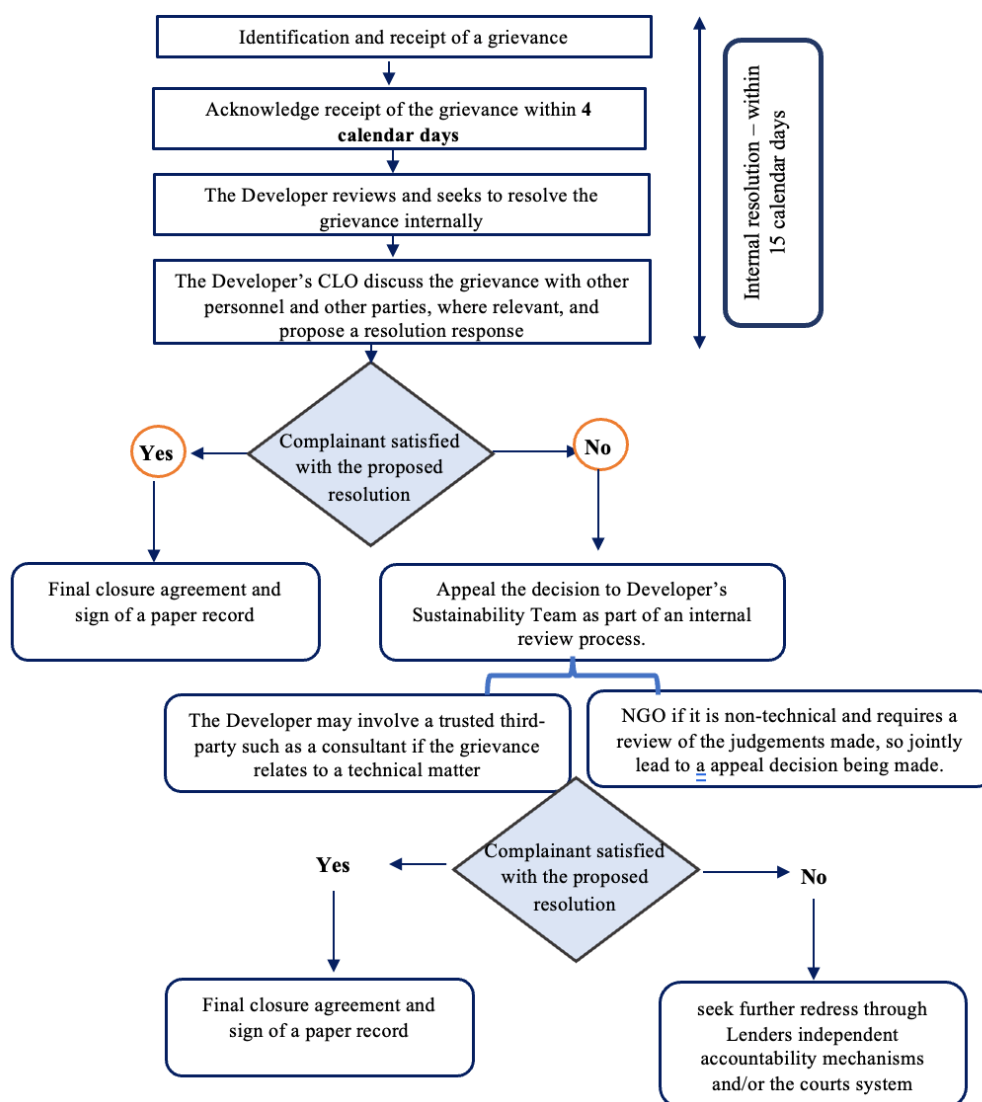
After a new grievance has been recorded, the Developer shall acknowledge receipt of the grievance within 4 calendar days by phone or using a written letter. Thereafter, the Developer shall communicate with the individual/group who raised the grievance to learn as much as possible about the details. It 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 calendar 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 SCATEC'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.

Flowchart



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

Supporting documents

The following supporting documents/files accompany this Grievance Mechanism:

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

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.

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.

9 VULNERABLE PEOPLE

The purpose of this section is to describe the way in which vulnerable people within displaced households are to be identified and supported during the preparation and implementation of the Land Acquisition and Livelihood Restoration Plan.

9.1 VULNERABILITY ANALYSIS

A detailed vulnerability analysis will be undertaken during preparation of the LALRP, using the outcome of the socio-economic baseline survey which will identify vulnerability characteristics at a household level. The socio-economic baseline survey shall be designed in a way that allows the identification of vulnerable people which may include any of the following people or groups that meet the following criteria (this will be clarified in the Land Acquisition and Livelihood Restoration Plan):

- Informal land users (people using government-owned land for their livelihood and food security, such as herders);
- Informal workers of an impacted business (people who are working in a business without a formal contract being issued by the business owner, which is a violation of Tunisian labour law);
- Households of youths (males and females under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans);
- Families where a disabled child is present, or a disabled parent is present, or where a family member is chronically ill or in need of care;
- Families with more than five children;
- Mothers or fathers who are bringing up the children in a single-parent family;
- Families in which one or both parents are unemployed and are registered at centres to promote employment and social protection of the population as jobseekers;
- Elderly people (people aged 65 years or older);
- People who are discriminated against in society due to their ethnicity, belief system, health status (including HIV/COVID-19), sexual orientation or gender self-identity;
- Unemployed people who are not currently in a training activity, or do not have any past training/qualifications

A preliminary vulnerability criteria and justification is provided in Table 5 - for each of the categories of vulnerable persons listed above.

Table 5 - Preliminary vulnerability criteria and justification

Group	Justification
Informal land users	Displaced persons who are reliant on the use and access to land which is not under their ownership, such as government-owned land, are particularly susceptible to changes in their socio-economic status. This category of displaced persons (Category 3) is also not entitled to replacement land in accordance with ESR5 and EIB ESS6.
Informal workers of an impacted business	Displaced persons who are informal workers may be particularly vulnerable to any change in a business impacted by resettlement, as they could have their employment halted without any prior notice period, and also be subjected to harassment as they are an informal worker.

Group	Justification
Households of youths (under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans)	Such persons are likely to be particularly susceptible to any changes in their socio-economic status in the absence of parents who would otherwise be economically active. They may also be looked after by elderly relatives.
Families where a disabled child is present, or a disabled parent is present, or where a family is (or has recently been) ill or is in need of care	Families with a disabled/ill adult or child are likely to be particularly susceptible to any changes in their socio-economic status, due to the need to provide care for the affected person, leading to their inability to work full-time, or be economically active at all.
Families with more than five children	Families who have a high number of children will have a high dependency ratio, whereby any change to the head of household's income could have a significant, adverse impact on the socio-economic status of the household.
Families who are below the national poverty line	Families who are recognised by the Tunisian government to be below the national poverty line. They struggle to meet basic needs like food, housing, and healthcare. This financial instability puts them at greater risk of poor health and limited opportunities.
Mothers or fathers who are bringing up the children in a single-parent family	Single parent families are likely to be particularly susceptible to any changes in their socio-economic status, due to the need to provide care for children without a partner who is economically active.
Families in which one or both parents are unemployed and are registered at centres to promote employment and social protection of the population as jobseekers	Parents without work are likely to be particularly susceptible to any changes in their socio-economic status due to limited sources of household income.
Elderly people (people aged 65 years or older)	People who are elderly may have a range of specific needs due to their age and may be less able to adapt to change, compared to their younger counterparts.
People who are discriminated against in society due to their ethnicity, belief system, health status (including HIV/COVID-19), sexual or gender orientation/self-identity	People who experience discrimination are typically unable to be influential within the community, assist in decision making processes, and 'be heard'. People who experience discrimination can find it difficult to access employment opportunities which reduces their potential to generate income and be economically active.
Unemployed people who are not currently in a training activity, or do not have any past training/qualifications	Persons who are unemployed are unlikely to have a regular source of income and may be particularly susceptible to a change in their access or use of land. Such persons may also find it difficult to access employment opportunities.

9.2 *POTENTIAL ACTIVITIES IN ASSISTANCE TO VULNERABLE PEOPLE*

The LALRP will provide additional information about the specific measures that are designed to help vulnerable people in displaced households and preliminary examples have been provided in Section 6. The LALRP will include as a separate budget line item, capital resources to provide support to vulnerable people and this shall be clearly described and justified. Where a specialised external implementing partners is appointed to assist deliver measures for vulnerable people/groups, then their inputs shall be included in the budget.

10 MONITORING AND EVALUATION

SCATEC will undertake monitoring and evaluation (M&E) activities with the objective of overseeing implementation of the LALRP so that any corrective actions needed can be identified and acted on in the shortest time possible. SCATEC shall retain competent professionals with experience in M&E to monitor the LALRP and design corrective actions, preparing monthly reports, for submission to EBRD/EIB, against pre-defined Key Performance Indicators (KPIs) (refer to Table 6 -).

SCATEC will undertake a monthly evaluation of the LALRP implementation process and gather information from KPIs for internal discussion and review. This shall take the form of an internal meeting led by SCATEC. The agenda will include the following:

- Introductions and objectives of the workshop;
- Review of the M&E KPIs;
- Review of the grievance register;
- Review of recent stakeholder engagements records;
- Review of the LALRP Corrective Action Register which shall be used to track progress of the corrective actions identified;
- Review and discussion of the current LALRP implementation process and assessment of where/when additional resources are required.

10.1 INDICATORS, INCLUDING KEY PERFORMANCE INDICATORS

Monitoring of the LALRP shall be undertaken using the indicators presented in Table 6 - Monitoring and evaluation indicators. The indicators shall be updated, as necessary, during preparation of the LALRP to reflect the final set of Project impacts expected to occur.

Table 6 - Monitoring and evaluation indicators

Indicator	Information Source	Frequency
Project impacts recorded during LALRP implementation: ▪ Number of impacted landowners ▪ Number of impacted informal land users ▪ Number of trees, crops, and other assets that are impacted ▪ Number of private land plots impacted	LALRP records	Monthly
Distribution of spending by: ▪ Cash compensation payments ▪ Payment for the temporary use of land ▪ Cost of providing livelihood restoration measures ▪ Specific assistance measures to vulnerable persons ▪ General implementation activities and administration	Financial records	Monthly
Number of private owned land plots impacted by an OHTL.	LALRP records	Monthly
Number of Legal Agreements signed for an OHTL pylon that have been successfully negotiated.	LALRP records	Monthly
Number of land plots passed to STEG to apply the Presidential Decree to force a landowner to accept an OHTL pylon, as negotiations have failed.	LALRP records	Monthly
Number of staff dedicated to implementation of the LALRP	Human Resources Department	Monthly
Number of stakeholder engagements undertaken with: ▪ Landowners ▪ Women adults in the households of landowners groups ▪ Informal land users (herders and their workers)	Stakeholder engagement records	Monthly

Indicator	Information Source	Frequency
▪ Displaced persons inside their households who have been identified as vulnerable		
Number of displaced persons who have agreed to compensation through the process of negotiation, against the planned total number of legal agreements required.	LALRP records	Monthly
Number of cash compensation payments provided, as a percentage of the planned total	LALRP records	Monthly
Number of displaced persons being provided with livelihood restoration measures, as a percentage of the planned total	LALRP records	Monthly
Number of vulnerable persons being provided with specific assistance measures, broken down by gender	LALRP records	Monthly
Number of displaced persons being provided with transitional support measures	LALRP records	Monthly
Number of grievances that have been received (in total).	Grievance record	Monthly
Number of grievances that have been registered	Grievance record	Monthly
Number of grievances that have been rejected	Grievance record	Monthly
Number of grievances that have been raised anonymously.	Grievance record	Monthly
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 complainant within the target time frame.	Grievance record	Monthly
Number of grievances closed-out	Grievance record	Monthly
Number of grievances still open	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 or administrative procedure.	Grievance record	Monthly

10.2 REPORTING

SCATEC will provide the following reports to EBRD/EIB during implementation:

- A Monthly Internal LALRP Monitoring Report which shall include a summary of the KPIs and details of corrective actions being undertaken or are already completed;
- Monthly submission of the Grievance Register;
- An internal Completion Audit Report which shall be undertaken when SCATEC understands that LALRP records implementation is complete (in agreement with EBRD/EIB).

11 IMPLEMENTATION RESPONSIBILITIES AND FUNDING

SCATEC has overall responsibility for the content of the LARF and future implementation of the LALRP records. SCATEC will closely cooperate with local authorities responsible for announcing the key implementation steps that will be detailed in the LALRP records (information disclosure, census, negotiation, valuation, compensation, monitoring and evaluation) to ensure that, in addition to Tunisian legislation, EBRD/EIB requirements are also met.

The profile of the state agencies involved in resettlement activities are summarized Table 7 -.

Table 7 - Profile of state agencies involved in resettlement

Institution	Role and responsibilities
Ministry of State Property and Land Affairs	• Drawing up appraisals and determining the market and rental values of real estate assets prior to any purchase, sale, exchange or rental transaction on behalf of the State and, at their request, on behalf of public administrative establishments, regional and local authorities and public enterprises. • Establishing the boundaries of the State's public and private domains, in collaboration with the relevant ministerial departments (including OTC – see below). • Monitoring land registration and expropriation operations on behalf of the public and private domains of the State and public administrative establishments. • Monitoring the enforcement of judgments handed down in cases concerning the State's domain and public administrative establishments, from the Property Court.
Agricultural Land Agency (AFA)	• The agency operates under the direct supervision of the Ministry of Agriculture, ensuring compliance with national agricultural policies and standards. • As the sole public body authorized to execute land redevelopment in agricultural areas, the agency not only oversees land consolidation operations but also provides expert opinions on real estate activities within its designated intervention areas. • Potential input into the design and implementation of livelihood restoration measures.
Office of Topography and Cartography (OTC)	• Delimiting and registering the boundary of public lands and state-owned land through cadastral surveys and administrative processes.
Governor of Sidi Bouzid	<i>NOTE: The Governorates function as mixed entities with deconcentrated and decentralized administrative structures at the regional level. Their primary role includes coordinating the implementation of development projects as decided by Government Ministries, articulating socio-economic issues, and orchestrating projects across various Municipalities within the same governorate. The Governor representing and primarily reporting to the Interior Minister, administers the governorate. Governors also hold trusteeship over local authorities. Governors are appointed by the central government and concurrently serve as presidents of the regional councils. Each governorate is additionally managed by a regional council, playing a significant role in regional governance.</i> • In the context of the Project, the Governorate will facilitate the dialogue and consultations with affected communities and would coordinate the implementation of the Project's management plans, ensuring that the activities align with both international and national standards, and local needs. • Assistance in the management of grievances.

Institution	Role and responsibilities
Office of Livestock and Pastures	The Office of Livestock and Pastures 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. The Office of Livestock and Pastures could have a role in providing livelihood restoration measures if any impacts

The roles and responsibilities of SCATEC concerning the LARF are presented in Table 8 -

Table 8 - Project Roles and Responsibilities

Position	Tasks
SCATEC E&S Manager	• Manage and allocate resources (human, financial, material) effectively to ensure the timely and successful implementation of LALRP activities. • Implement quality assurance processes to ensure that resettlement and livelihood restoration activities meet the project standards and objectives and address the needs of affected communities. • Provide regular updates and detailed reports to higher management and relevant stakeholders about the progress, challenges, and achievements in the LALRP records implementation. • Coordinate the signature and payment of all Land Agreements in coordination with SCATEC's legal department. • Issue monthly M&E reports to SCATEC Senior Management. • Support ongoing implementation of the grievance mechanism. • Coordinate the activities of the CLOs. • Conduct the internal LALRP Completion Audit, and then to develop/implement the Corrective Action Plan if required.
SCATEC CLO	• Raise awareness of the grievance mechanism and record, investigate, and help resolve grievances whilst maintaining a single register of all grievances raised and track their status. • Communicate the grievance mechanism to all stakeholders, ensuring that they are aware of how to access and utilise it. • Regularly review and assess the effectiveness of the grievance mechanism, ensuring that it operates as intended and adheres to project policies and standards. • Act as a mediator or facilitator in the resolution process, ensuring that grievances are addressed in a timely and fair manner. • Inform the displaced persons of their eligibility and entitlements, and how these are to be provided to them. • Assist in the general implementation of the LALRP.

11.1 BUDGET AND ARRANGEMENTS FOR FUNDING

A budget will be described in the LALRP records and will include a contingency amount of 15%, added to the sub-total of all costs. The aim of the contingency is to cover any unexpected costs, or changes in cost, that occur during implementation. The funding for implementation shall be provided by SCATEC. In accordance with the requirements of the lenders, SCATEC undertakes to make available to the absent or unavailable owners the amounts of compensation due to them, by depositing them with the Deposit and Consignment Office of the Republic of Tunisia, prior to the start of work. Based upon the current understanding of the scale of resettlement impacts, the estimated budget for the future implementation of the LALRP is provisionally calculated to be in the range of USD 25,000 to USD 35,000 including the following:

- Strengthening grazing livelihoods and supporting vulnerable people and gender.
- Compensation for eligible landowners affected by the permanent loss of land due to the installation of 31 pylon foundations along the OHTL, which spans both public and private lands. (It should be noted that compensation for public land will be covered by STEG under an agreement with the relevant State authority).
- Cash compensation for landowners along the route for agricultural damage resulting from the laying of cables and the installation of pylons
- Compensation for lost of access to the Majel

1.7 TIME SCHEDULE

A detailed schedule shall be included in the LALRP records. The LALRP records is expected to take 3 months to prepare, once the EPC Contractor has identified the location of the pylons. Thereafter, full implementation will take 2 months until a Completion Audit can be scheduled, which is likely to take up to 1 month to complete given the small scale of resettlement impacts.

11.2 CHANGE MANAGEMENT

A Change Management register/procedure shall be part of the EPC Contractor's Environmental and Social Management System (ESMS). The ESMS shall include a formal procedure that aims to screen changes in the Project so that any resettlement-related risks and impacts that are linked to this change are identified, assessed, and responded to. This may include, for example, the preparation of an addendum to the LALRP or other actions, as necessary.

Irrespective of the magnitude of change, all resettlement-related activities associated with the Project will be undertaken in accordance with the principles and other commitments included in the LALRP so that there is consistency in the approach taken to the displaced persons and other stakeholders.

The process used to evaluate change in the Change Management register/procedure will comprise the following:

Step 1 – Review the need and implications of the potential change

- Assess the need for the change to ensure that it is fully justified, and that opportunities to avoid/minimise adverse impacts to displaced persons have already been taken to the extent possible.
- Identify any legal or other requirements linked to the potential change, using the content of the LALRP.
- Conduct an analysis of the potential implications of the change which could include, for example, the identification of additional displaced persons.
- Determine what stakeholder engagement activities are required to discuss and communicate the change and its potential implications.
- Prepare a summary report, or a LALRP Addendum (if required), to provide a summary of the change and include details of any budgetary and time implications.

Step 2 – Disclose the findings of Step 1 and communicate the change to stakeholders

- Using the summary report or LALRP Addendum, communicate the change to stakeholders whilst ensuring that all engagements are recorded in writing, so that evidence is available to reflect how the change was discussed.
- Take into consideration the views and opinions of stakeholders so that the process used to implement the change is optimised.

- Update the summary report or LALRP Addendum as needed, including details of how the potential change has been communicated, and how stakeholder feedback has been used to improve the implementation of the change.

Step 3 – Implement the change and monitor E&S outcomes

- Implement the change in accordance with the summary report or LALRP Addendum using the (existing or additional) M&E indicators so that the outcome of the change is recorded over time, and improvement measures are taken to improve the process applied, where necessary.
- Depending upon the outcome of monitoring, it may be necessary to adjust the way in which the change is implemented and take corrective actions to ensure that all changes are implemented in accordance with the principles and process already described in the LALRP.

Appendix A. Landowner Stakeholder Engagement Record

Appendix B. Process used to conduct the census, asset inventory survey, and socio-economic survey

Data collection surveys during preparation of the LALRP

During preparation of the LALRP the following surveys shall be undertaken:

- A census, asset and inventory survey; and
- A socio-economic baseline survey.

The scope and objectives of each survey are described in the paragraphs below. A cadastral survey is not required as no land is being acquired.

Census, asset and inventory survey

The objective of the census, asset and inventory survey is to gather details of the displaced person and their household, and to collect data on assets that are to be impacted by the Project which cannot be easily moved to another location.

The census, asset and inventory survey shall collect the following information:

- The owner of the asset affected including their name, age, gender, educational attainment, vulnerability characteristics, location they are resident in, contact details and preferences for future communications; and
- The legal ownership status of assets. Details of land rental, landlord and land tenancy agreements will also be gathered, where relevant to do so.

During this survey, details of communal assets that may be impacted, temporarily or permanently shall be identified, as such land will not be linked to a specific individual. Communal assets that may be impacted include grazing land and access restrictions to water sources and forested areas.

A cut-off date will be established and this will comprise the final day of the census, asset and inventory survey. Details of the purpose and actual date of the cut-off date will be publicly disclosed to the displaced persons and relevant government representatives, including local communities and the governorate. A signed acknowledgement form (in French and Arabic) will be used to ensure that each representative of a displaced household has received details of the cut-off date during the census, asset and inventory survey. The results of the census, asset and inventory survey will be compiled into a single database using unique reference numbers. Using the results of the surveys and valuation, a valuation report will be prepared to quantify the value of assets recorded using the principle of full replacement cost.

Socio-economic baseline survey

The Socio-economic survey shall be used to gather detailed information on socio-economic conditions of the displaced persons. The survey will comprise a household questionnaire, key informant interviews with selected stakeholders, and focus group discussions (FGDs) with community representatives that focus on resettlement impacts and mitigation strategies, including potential livelihood restoration measures.

The socio-economic baseline survey will cover the following topic areas:

- Household demographics (composition of the household, gender, age);
- Location they are resident in and general standard of living;
- Household health and the presence of vulnerable people;
- Livelihood details including access to land, ownership of livestock, use of natural resources, and challenges associated with their existing livelihood;
- Household income and expenditure, assets and access to credit, and debt; and
- Preferences associated with the provision of livelihood restoration measures.

Key informant interviews will be held with various stakeholders to gather information on challenges faced by people undertaking land-based livelihoods in the Project area. This information shall be used to supplement the information gathered by the socio-economic baseline survey.

Focus Group Discussions (FGD) shall be used to group similar categories of displaced persons together to explore the way in which transitional support, livelihood restoration measures, and additional support to vulnerable people can be provided during implementation. This is likely to include separate discussion with young people, women, and people with knowledge of the needs of vulnerable people. Using the outcome of the FGDs with women, a gender sensitivity assessment on the proposed compensation entitlements and livelihood restoration measures will be undertaken, to ensure that they are accessible, practical and effective in restoring women's livelihoods and standards of living, and culturally appropriate.