RURAL ELECTRIFICATION AGENCY

ENERGY ▿ EMPOWERMENT ▿ EFFICIENCY

DRAFT STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

THE

NIGERIA DISTRIBUTED ACCESS THROUGH RENEWABLE ENERGY SCALE-UP PROJECT (DARES)

October 2026

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Table of Contents

Contents

Table of Contents ii

List Of Tables iv

LIST OF ACRONYMS AND ABBREVIATIONS v

Executive Summary 6

ES1: Background 6

ES2- KEY NATIONAL LEGAL PROVISIONS FOR CITIZEN ENGAGEMENT 7

ES3: STAKEHOLDER IDENTIFICATION AND ANALYSIS 7

Project Affected Parties 8

Other Interested Parties 8

Disadvantaged and Vulnerable Groups 8

ES4: STAKEHOLDER ENGAGEMENT PLAN 9

ES5-RESOURCES AND RESPONSIBILITIES 9

ES6- GRIEVANCE MANAGEMENT 10

ES7- MONITORING AND REPORTING 11

CHAPTER 1 12

1. Introduction/Project Description 12

1.2 DARES Project Description 12

1.3. Additional Financing for Project Scale Up 13

1.4 Project Components 14

CHAPTER 2 17

Objective/Description of SEP 18

2.1 Key National Legal Provisions for Citizen Engagement 18

2.1.1 The Freedom of Information Act 2011 18

2.1.2 Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004 18

2.1.4 Other Legal Provisions on Stakeholder Engagement and Disclosure 19

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement 19

CHAPTER 3 21

3. Stakeholder identification and analysis 21

3.1 Methodology 21

3.2. Affected parties and other interested parties. 21

3.3 Other Interested Parties: 22

3.4. Disadvantaged/vulnerable individuals or groups. 22

CHAPTER 4 24

4. STAKEHOLDER ENGAGEMENT PROGRAM 24

4.1. Summary of Stakeholder Consultations During Project Implementation and AF Preparation 25

Official Use Only

4.2 Information Disclosure Strategy **27**
4.3. Disclosure Timing **28**
4.4. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement. **28**
4.5. Reporting back to stakeholders **39**
CHAPTER 5 40
5. Resources and Responsibilities for implementing stakeholder engagement activities **40**
5.1. Resources **40**
5.2. Management functions and responsibilities **44**
CHAPTER 6 45
6. Grievance Mechanism **45**
6.1. GRIEVANCE MANAGEMENT **45**
6.2. Description of Grievance Mechanism **46**
6.3. Grievance Mechanism (GM) **47**
6.4 Grievance Framework **47**
6.5 DARES Grievance Escalation Process **48**
6.7 World Bank Grievance Redress System **50**
CHAPTER 7 51
7. Monitoring and Reporting **51**
7.1. Summary of how SEP implementation will be monitored and reported. **51**
7.2 Reporting **51**
7.3. Stakeholder Involvement in Project Monitoring **52**
7.4. Reporting back to stakeholder groups **53**
Conclusion **53**
Annexes 54

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List Of Tables

Table 1: Indicative Resource Allocation 13
Table 2: Description of component 1 15
Table 3: Description of component 2 16
Table 4: Project Affected Parties 22
Table 5: Other Interested Parties 22
Table 6: Vulnerable Groups 23
Table 7: Summary of Stakeholder Engagement 25
Table 8: Information Disclosure Plan 27
Table 9: Engagement Techniques 29
Table 10: Methods/Tools for Information Provision, Feedback, Consultation and Participation 30
Table 11: Stakeholder Engagement Plan (SEP) 35
Table 12: Stakeholder Engagement and Disclosure Methods 37
Table 13: Organizational Roles and Responsibilities 40
Table 14: Proposed Budget Line Items for Stakeholder Engagement 42
Table 15: Grievance Management Process 46
Table 16: Key Performance Indicators by Project Phase 52
Table 17: Outline of Reports to Stakeholders 53

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LIST OF ACRONYMS AND ABBREVIATIONS

AF	Additional Financing
AoI	Area of Influence
CDA	Community Development Association
CSOs	Civil Society Organizations
CLO	Community Liaison Officer
DARES	Distributed Access To Renewable Energy Scale-Up Project
DISCO	Distribution Company
ES	Executive Summary
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
FGD	Focus Group Discussions
FGN	Federal Government of Nigeria
FMEnv	Federal Ministry of Environment
FMoF	Federal Ministry of finance Budget and Planning
FMoP	Federal Ministry of Power
FPIC	Free Prior Informed Consent
GRM	Grievance Redress Mechanism
GO	Grievance Officer
IDP	Internally Displaced Person
IVA	Independent Verification Agent
LGA	Local Government Area
LRP	Livelihood Restoration Plan
MDAs	Ministries, Departments and Agencies
MPA	Multi-phase Programmatic Approach
MYTO	Multi Year Tariff Order
NEP	Nigeria Electrification Project
NGO	Non-Governmental Organization
PAF	Project Affected Families
PAP	Project Affected Person
PBG	Performance Based Grant
PDO	Project Development Objective
PID	Project Identification Document
PMU	Project Management Unit
REA	Rural Electrification Agency
TA	Technical Assistance
VDC	Village Development Committee
WBG	World Bank Group
WDR	World Development Report

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Executive Summary

ES1: Background

The Federal Government of Nigeria (FGN) launched the Nigeria Electrification Project (NEP) in June 2018 as a results-based, private-sector led initiative to implement the RESIP. NEP is FGN's flagship off-grid access program, and it leverages USD 550 million of public financing (USD 350 million credit support by WB and USD 200 million loan support by AfDB) and crowds in the private sector expertise and financing with an aim to connect over 3.5 million people, 705,000 households, 90,000 MSMEs, 12 universities, 3 teaching hospitals, 100 COVID isolation centers and 400 primary health centers. The project has catalyzed large-scale private sector investments through grant/subsidy-based instruments to kick-start private sector led off grid and mini grid sectors in Nigeria.

The Nigeria Distributed Access through Renewable Energy Scale-Up Project (DARES) is the Federal Government of Nigeria's flagship programme for expanding electricity access through private sector-led distributed renewable energy solutions. The project was approved by the World Bank on 14 December 2023 and became effective on 15 November 2024. The Project Development Objective (PDO) remains unchanged under the Additional Financing (AF).

The project supports Nigeria's objective of achieving universal electricity access and contributes to the implementation of the National Energy Compact, the Energy Transition Plan, and Mission 300.

The parent project financing consists of:

- US$750 million in IDA credits;
- US$49.1 million in trust fund grant resources;
- JICA co-financing equivalent to approximately US$193.8 million;
- Additional technical assistance support from development partners; and
- Significant private sector investment mobilization.

The proposed Additional Financing of US$500 million will scale up distributed renewable energy deployment across Nigeria. The AF is expected to be complemented by approximately US$116.2 million in co-financing from the Agence Française de Développement (AFD).

The Additional Financing expands the scale and geographic reach of activities already supported under DARES while maintaining the original Project Development Objective and implementation arrangements. The AF introduces additional funding for isolated and interconnected mini-grids, public institution electrification, Solar Home Systems, productive-use energy solutions, Solar for Business initiatives, and technical assistance activities. No new environmental and social risk classification is proposed under the AF. Instead, the existing environmental and social management framework is being updated to reflect the expanded scale of implementation and broader stakeholder engagement requirements.

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The project development objective (PDO) is to increase access to electricity services for households, public institutions and MSMEs with private sector led distributed renewable energy generation.

The Nigeria DARES has three components as follows:
Component 1. Solar Hybrid Mini-Grids for Economic Development. The AF will scale up performance-based grants for isolated and interconnected mini-grids, support minimum subsidy tenders for interconnected mini-grids, and expand electrification of federal and sub-national public institutions. Public-institution investments will use interconnected solar-hybrid mini-grids and Energy-as-a-Service arrangements, with structured engagement of facility management, host communities, relevant state agencies, DisCos, and service providers before site confirmation and contracting.

Component 2. Standalone Solar Systems for Households, MSMEs, and Agribusinesses. The AF will expand performance-based grants for solar home systems and Productive Use of Electricity solutions and further scale the Solar for Business window for MSMEs, markets, economic clusters, and agro-processing centres. Engagement requirements will cover affordability, eligibility, service terms, tariffs, consumer protection, grievance channels, and inclusion of women and vulnerable groups.

Component 3. Technical Assistance. Additional IDA and AFD resources will support institutional strengthening, ecosystem building, and engagement with states, including capacity building for the Federal Ministry of Power, REA, NERC, NEMSA, state energy institutions and regulators, DisCos, developers, financiers, and other distributed renewable energy stakeholders. The citizen engagement framework will be updated to govern the expanded AF scope, including the public-institution and Solar for Business windows.

ES2- KEY NATIONAL LEGAL PROVISIONS FOR CITIZEN ENGAGEMENT

This section presents a brief overview of the national legal provisions that necessitates citizen engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions. Key national and legal provisions reviewed includes;

- The Freedom of Information Act
- Constitution of the Federal Republic of Nigeria
- Nigerian Environmental Assessment Law
- Other Legal Provisions on Stakeholder Engagement and Disclosure
- World Bank Environmental and Social Standard on Stakeholder Engagement (ESS10)

ES3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

For the purposes of effective and tailored engagement, the stakeholders of the Nigeria DARES project can be divided into three core categories: as follows:

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Project Affected Parties

Project Affected Parties are individuals, groups, institutions, and communities that may directly benefit from or be affected by project activities. These include:

- Households receiving electricity access;
- MSMEs and productive users;
- Public institutions receiving energy services;
- Communities hosting project infrastructure;
- Customers of mini-grid and standalone solar systems;
- Landowners and land users where project facilities are developed;
- Community leadership structures;
- Market associations and economic clusters;
- Beneficiary institutions.

Other Interested Parties

Other Interested Parties include stakeholders with an interest in the project who may not experience direct impacts.

These include:

- Federal Ministry of Power;
- Rural Electrification Agency (REA);
- State Governments;
- Nigerian Electricity Regulatory Commission (NERC);
- Nigerian Electricity Management Services Agency (NEMSA);
- Distribution Companies (DisCos);
- Private developers and RESCOs;
- Financial institutions and investors;
- Development partners;
- Civil society organizations;
- Academic institutions;
- The media.

Disadvantaged and Vulnerable Groups

Particular attention will be given to vulnerable groups who may face barriers to participation or access to project benefits.

These groups include:

- Women and female-headed households;
- Persons with disabilities;
- Elderly persons;
- Poor and low-income households;
- Youth;

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- Internally displaced persons where applicable;
- Minority and underserved populations.

Special engagement measures will be adopted to ensure these groups can participate meaningfully in consultations and benefit from project interventions.

ES4: STAKEHOLDER ENGAGEMENT PLAN

The goal of the Stakeholder Engagement Plan is to provide effective, inclusive, accessible, and meaningful engagement throughout the project life cycle, proportionate to the expanded scope of the IDA Additional Financing. Engagement will cover project-affected parties (individuals, household and community members), host communities, public institutions, MSMEs, participating states, private developers and RESCOs, DisCos, regulators, civil society, vulnerable groups, and other interested parties, including stakeholders associated with the Energy-as-a-Service and Solar for Business windows.

The format of every engagement activity will meet general requirements on accessibility and ensure the participation of vulnerable individuals and women groups in project consultations with tailored techniques.

An important part of the Stakeholder Engagement process is to identify themes to discuss with Stakeholders and to ensure that these themes include issues that are important to customers.
Information disclosure is an important component of stakeholder engagement and will be undertaken throughout the project lifecycle in accordance with ESS10 and applicable national regulatory requirements.

Electronic copies of the SEP will be placed on the website of the Bank and the Implementing agency, Rural Electrification Agency (REA) website.

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying updated SEP and all applicable environmental and social instruments, will be disclosed following World Bank clearance and prior to commencement of AF-supported activities and shall be disclosed through Rural Electrification website, Environmental Impact Department of the federal ministry of environment and through community awareness program.

ES5-RESOURCES AND RESPONSIBILITIES

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating PMU domiciled in REA and local sub-contractors.

The Project Management Unit (PMU) will work collaboratively with the Federal Ministry of Finance Budget and National Planning (FMOF) and Ministry of Power (MOP) on a need basis to coordinate overall procurement, perform audits, provide financial report, conduct stakeholders' engagement, project disclosure and outreach and ensure availability of resources.

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In case the internal capacity resources at the project appear to be insufficient or over stretched in view of the expanded scope of the AF to cover energizing public institution under the AF, the project will consider engaging a reputable third-party familiar with the region and is acceptable to the community. The organization (non-governmental) engaged would then not only serve as a link between the DARES project and the community but as a third party in the implementation of the SEP and the project's Grievance Mechanism (GM).

ES6- GRIEVANCE MANAGEMENT

In compliance with applicable national requirements and ESS10, the existing project Grievance Mechanism will be maintained, updated, and scaled up for the Additional Financing. It will remain accessible to communities, households, MSMEs, public institutions, workers, and other stakeholders, including through multiple in-person and remote uptake channels, anonymous submissions, referral pathways for SEA/SH complaints, and an electronic grievance platform linked, where feasible, to the SERVICOM system. The mechanism will receive, register, assess, refer, resolve, and report concerns arising from all AF activities, including public-institution electrification, Energy-as-a-Service arrangements, Solar for Business, mini-grids, and standalone solar solutions.

The REA/PMU shall establish a grievance uptake point. The GM framework will include the six steps below;

- ***Step 1: Uptake.***
- ***Step 2: Sorting and processing.***
- ***Step 3: Acknowledgement and follow-up.***
- ***Step 4: Verification, investigation, and action.***
- ***Step 5: Monitoring and evaluation.***
- ***Step 6: Providing Feedback.***

A three stage/tier GM will be used for grievance resolutions on the project.

i. GM Stage One - Specific Implementing Developer Level Resolution

All Developers would attempt a full resolve of grievances at this stage as much as practical. The grievance committee at each community would make every reasonable effort as much as practical at this stage to ensure all grievances raised to it has been adequately resolved to the satisfaction of all parties involved.

ii. GM Stage Two – REA Implementing Agency Level Resolution

The central platform for receiving, sorting and assigning stage two grievance will be located in the PMU of the REA.

iii. GM Stage Three – DARES Ombudsman Level Resolution

The DARES Ombudsman shall be formed of key officers from the REA.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or

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could occur, as a result of the World Bank's non-compliance with its policies and procedures. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org and the world Bank Grievance Redress Service

ES7- MONITORING AND REPORTING

Monitoring will assess the quality, reach, inclusiveness, responsiveness, and outcomes of stakeholder engagement under the parent project and Additional Financing. Indicators will include participation by stakeholder category and sex, consultations completed before site confirmation and contracting, disclosure of tariff and service arrangements, beneficiary satisfaction, issues raised and acted upon, and the percentage of project-related grievances addressed within the approved timeline. Satisfaction findings will be reported separately, as applicable, for women, MSMEs, public institutions, and other relevant beneficiary groups. AF-related grievances, including those from public-institution and Solar for Business sites, will be tracked and reported through quarterly monitoring reports.

Conclusion

The DARES team has had extensive stakeholder consultations bilaterally and through workshops, with developers and REA and recognizes the importance to assist developers to prepare better projects, perform market intelligence, write business/funding proposals, and build HR capacity.

The Project's Stakeholder Engagement Plan (SEP) is informed by a set of principles defining its core values underpinning interactions with identified stakeholders. This plan aligns with the requirements of ESS10 which stipulates that meaningful stakeholder's engagement should be free of external manipulations, interference, coercion, discrimination, and intimidation.

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CHAPTER 1

1. Introduction/Project Description

The Federal Government of Nigeria (FGN), through the Rural Electrification Agency (REA), launched the Nigeria Electrification Project (NEP) in June 2018 as a results-based, private-sector led initiative to implement the RESIP**.** NEP is FGN's flagship off-grid access program, and it leverages USD 550 million of public financing (USD 350 million credit support by WB and USD 200 million loan support by AfDB) and crowds in the private sector expertise and financing with an aim to connect over 3.5 million people, 705,000 households, 90,000 MSMEs, 12 universities, 3 teaching hospitals, 100 COVID isolation centers and 400 primary health centers. The project has catalyzed large-scale private sector investments through grant/subsidy-based instruments in order to kickstart private sector led off grid and mini grid sectors in Nigeria).
Building on these successes, the Government and its development partners launched DARES as Nigeria's primary platform for accelerating private investment in distributed renewable energy and achieving universal access targets.

1.2 DARES Project Description

Given the financing need of more than USD 25 billion for universal electrification in Nigeria, the scope of DARES supports the REA in the creation of an ecosystem of adequate risk allocation among stakeholders (regulator, private sector, financial institutions, policy makers) that would facilitate scale-up of different business models be it Mini-Grids, solar home systems, electrification of public institutions, productive loads in agriculture or solar / inter-connected mini grid solutions for urban consumers.

The DARES project supports Nigeria's goal of achieving universal electricity access by 2030 and is being scaled up through Additional Financing (AF) to expand investments in mini grids, stand alone solar systems, productive use energy solutions, and electrification of public institutionsThe DARES supports expanded access to electricity using distributed renewable energy technologies and market-based delivery models.

The project supports:

- Solar hybrid mini-grids;
- Interconnected mini-grids;
- Standalone solar systems;
- Productive-use energy solutions;
- Solar for Business programmes;
- Public institution electrification;
- Institutional strengthening and market development.

The project operates nationally and is implemented through the Rural Electrification Agency (REA).

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1.3. Additional Financing for Project Scale Up

To accelerate progress towards universal electricity access and respond to strong market demand for distributed renewable energy investments, the World Bank is proposing Additional Financing (AF) of US$500 million under the DARES.

The AF will scale up successful interventions under the parent project and maintain the private sector led implementation model. Specifically, the AF will:

- Scale up performance based grant programmes supporting isolated and interconnected mini grids.
- Expand electrification of public institutions under an Energy as a Service (EaaS) framework.
- Accelerate deployment of Solar Home Systems (SHS).
- Expand investments in Productive Use of Energy (PUE) solutions.
- Support Solar for Business (SFB) systems for MSMEs.
- Strengthen institutional capacities for distributed renewable energy deployment.
- Enhance implementation support, sector planning, safeguards management and stakeholder engagement.

The proposed Additional Financing (AF) to the Distributed Access through Renewable Energy Scale-up (DARES) Project comprises US$500 million in additional IDA financing and EUR 100 million (approximately US$116.2 million) in joint and parallel co-financing from the French Development Agency (AFD), subject to finalisation of financing agreements between AFD and the Federal Republic of Nigeria. This financing will support the scale-up of renewable energy access interventions under DARES, including mini-grids, standalone solar systems, electrification of public institutions, and technical assistance activities.

The AF builds on existing financing provided under the project, which includes a US$49.1 million grant from the United States Department of Justice (US DOJ) and approximately US$193.8 million in parallel co-financing from the Japan International Cooperation Agency (JICA). The project also continues to mobilise substantial private sector investment through its performance-based financing mechanisms and private sector-led delivery model.

The AF will support three broad investment areas:

Table 1: Indicative Resource Allocation

Component / focus area	Parent project component Public Finance Provided (PFP) USD	Revised component financing, including proposed Additional Financing (US$ million)	Expected private capital mobilized (US$ million)
Solar Hybrid Mini Grids	410 million	1,042.7	462
Standalone Solar Systems	300 million	450.0	830

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Technical Assistance	40 million	94.6	Not specified
Total	**750 million**	**1,587.3**	**1,292**

The proposed AF will allocate approximately US$364.6 million to scale up mini-grid deployment and the electrification of public institutions, US$200 million to accelerate rollout of solar home systems, productive-use equipment and solar-for-business solutions, and US$51.6 million for technical assistance and institutional capacity strengthening.

It should be noted that the amounts shown above represent project financing envelopes and investment allocations and do not constitute resettlement budgets. Actual land acquisition, compensation, livelihood restoration and other resettlement-related costs, where required, will be determined through site-specific environmental and social assessments and Resettlement Action Plans (RAPs) prepared during implementation.[1]

The Project Development Objective remains unchanged.

The Project Development Objective (PDO) is to increase access to electricity services for households, public institutions, and MSMEs through private sector-led distributed renewable energy generation.

1.4 Project Components

1.4.1 Component 1: Solar Hybrid Mini Grids for Economic Development. Table 1 of the Project Paper reports US$1,042.7 million in component financing, including proposed AF/co-financing and excluding private capital. This supports isolated and interconnected mini grids and public-institution electrification through Minimum Subsidy Tender (MST) and Performance-Based Grants (PBG).

[1]The financing allocations presented in this SEP are based on the draft DARES Additional Financing Project Paper. Final allocations may be adjusted following completion of negotiations and execution of financing agreements between the Government of Nigeria, the World Bank, AFD and other financing partners. Any subsequent revisions will not affect the procedures, principles or requirements set out in this SEP.

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Table 2: Description of component 1

Component 1 window	Delivery and coverage	Financing status
1.1(a) Isolated Mini Grids — MST	Allocation subject to confirmation; not a confirmed IDA pipeline	Original IDA allocation removed; JICA allocation TBD
1.1(b) Interconnected Mini Grids — MST	Competitive portfolios; urban and peri-urban residential and economic clusters; coordination with DisCos	Supported by revised IDA and co-financing; final JICA/AFD split TBD
1.1(c) Solar Roof Top	Previously dropped	No active allocation
1.1(d) Public Institutions	Federal tertiary institutions: interconnected solar-hybrid mini grids; eligible sub-national healthcare and education facilities: EaaS	US$129.1 million, including proposed AF
1.2(a) Isolated Mini Grids — PBG	Developer-led rural/unserved sites; existing-system expansion and network densification	US$398.0 million revised IDA, including proposed AF; JICA split TBD
1.2(b) Interconnected Mini Grids — PBG	Developer-led urban/peri-urban sites in collaboration with DisCos	US$47.0 million revised IDA, including proposed AF; JICA/AFD split TBD

MST aggregates demand and competitively selects private developers. Active investments include interconnected mini grids under 1.1(b) and public-institution electrification under 1.1(d). The former Solar Roof Top activity under 1.1(c) was previously dropped. Table 1 removes the original IDA allocation for isolated MST under 1.1(a), with JICA allocation still to be determined; it is not a confirmed IDA-funded pipeline. Public-institution financing totals US$129.1 million, including proposed additional IDA financing of US$10.0 million. Federal tertiary institutions use interconnected solar-hybrid mini grids; eligible sub-national institutions use an Energy-as-a-Service (EaaS) model.

1.4.2 Subcomponent 1.2: Performance-Based Grants. Proposed additional IDA financing of US$230.0 million for isolated mini grids under 1.2(a) brings its IDA allocation to US$398.0 million; US$20.0 million for interconnected mini grids under 1.2(b) brings its IDA allocation to US$47.0 million. Isolated support includes existing portfolio capacity expansion and network densification. Developers identify sites; interconnected projects involve DisCos. AFD financing of US$104.6 million is proposed across interconnected MST and PBG windows. The AFD split and JICA mini-grid subcomponent allocations remain to be finalized.

1.4.3. Component 2: Standalone Solar Systems (SAS) for Households, MSMEs, and Agribusinesses. The proposed revised IDA allocation is US$450.0 million. Table 2 of the Project Paper separately reports US$830.0 million in expected private capital mobilized. Active PBG windows are Solar Home Systems, Productive Use of Electricity and Solar for Business.

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Table 3: Description of component 2

Component 2 window	Scope and beneficiaries	Revised IDA allocation including proposed AF (US$ million)
2.1(a) Solar Home Systems	Quality assured SHS for households, micro-enterprises and public facilities in unserved and underserved communities; verified connections; pay-as-you-go or outright purchase	200.0
2.1(b) Productive Use of Electricity	Solar water pumps, cold chain/storage, grain milling, rural telephony, agro-processing and other viable income-generating applications	100.0
2.1(c) Solar for Business	MSMEs, markets, economic clusters and agro-processing centers	150.0
2.2 Catalytic Grants	Previously discontinued; no active window	0

1.4.4 Subcomponent 2.1: Performance Based Grants. Proposed revised allocations are US$200.0 million for Solar Home Systems under 2.1(a), US$100.0 million for Productive Use of Electricity under 2.1(b), and US$150.0 million for Solar for Business under 2.1(c). SHS support includes quality-assured pay-as-you-go and outright-purchase products, higher-tier systems and continued Tier 1 delivery. PUE includes solar irrigation pumps, cold chain and storage, grain milling, rural telephony and agro- processing. Solar for Business serves MSMEs, markets, economic clusters and agro-processing centres.

1.4.5. Subcomponent 2.2: Catalytic Grants. This activity was previously discontinued and has a revised allocation of zero; it is not an active financing window under the proposed AF.

1.4.6. Component 3: Technical Assistance. Table 1 of the Project Paper reports proposed revised financing of US$94.6 million, including IDA, JICA and AFD resources. TA strengthens implementation capacity, the distributed renewable energy ecosystem and state engagement.

1.4.7. Subcomponent 3.1: Institutional strengthening. Proposed revised financing totals US$45.8 million. Support covers REA, the Federal Ministry of Power, NERC, the Nigerian Electricity Management Services Agency, state energy agencies and regulators, and DisCos, including standards, grid integration and program monitoring, evaluation and learning.

1.4.8. Subcomponent 3.2: Ecosystem building. Proposed revised financing totals US$28.8 million for technical assistance and capacity building to strengthen the enabling environment, sustain private-sector delivery and advance project pipelines to investment grade.

1.4.9. Subcomponent 3.3: Engagement with States. Proposed revised financing totals US$20.0 million to strengthen state participation, policy and implementation capacity under the Electricity Act 2023. REA coordinates with participating sub-national governments. State

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readiness support is available through TA; public-institution participation depends on REA eligibility criteria.

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CHAPTER 2

Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

2.1 Key National Legal Provisions for Citizen Engagement

2.1.1 The Freedom of Information Act 2011

The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. This Act applies not only to public institutions but also to private organizations providing public services, performing public functions, or utilising public funds. According to the Act:

- All stakeholders are entitled to access to any records under the control of the government or public institution.
- Any stakeholder denied information can initiate a court proceeding to effect the release of such information
- All public institutions shall make available any records as requested by the stakeholders within a period of 7 days.

2.1.2 Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004

This act provides guidelines for activities for which EIA is compulsory. It prescribes the general principles and procedure for conducting and reporting EIAs including SIAs. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project. It also states the following:

- That proponent shall ensure an effective ongoing stakeholder engagement process in a structured and culturally appropriate manner with the PAPs and recommends that for projects with social risks and adverse impacts, disclosure of information should occur early in the assessment process, in any event before the project construction commences, and on a continuous basis.
- For Projects with potentially significant adverse impacts on Affected Communities, the proponent shall conduct an informed consultation and participation process. The proponent will tailor its consultation process within the context of the risks and impacts

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of the project; the project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups.

2.1.4 Other Legal Provisions on Stakeholder Engagement and Disclosure

The Nigerian Urban and Regional Planning Act, Cap N138, 2004 provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).
- A Stakeholder Engagement Plan is proportionate to the nature and scale of the project and its potential risks and impacts need to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank,

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2017: 100). For more details on the WB Environmental and Social Standards, please follow the link below:
https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards

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CHAPTER 3

3. Stakeholder identification and analysis

For the purposes of effective stakeholder engagement and in accordance with ESS10, stakeholders have been categorised into three groups: (i) Project Affected Parties; (ii) Other Interested Parties; and (iii) Disadvantaged and Vulnerable Individuals or Groups. These categories are not mutually exclusive, and certain stakeholders may fall within more than one category depending on the nature of project impacts and their circumstances. Stakeholder identification and analysis will be updated during implementation as specific project locations are confirmed.

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- *Flexibility:* If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibit traditional forms of face-to-face engagement, the methodology will adapt to other forms of engagement, including various forms of internet- or phone-based communication.

3.2. Affected parties and other interested parties.

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category: rural unserved and underserved communities, urban industrial and commercial customers, associations of customers, and Vulnerable Groups.

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Table 4: Project Affected Parties

Stakeholder Group	Interest in Project
Beneficiary households	Electricity access, affordability and reliability
MSMEs	Productive use opportunities and business growth
Public institutions	Reliable electricity supply
Host communities	Project impacts and benefits
Landowners and land users	Land access and compensation issues where applicable
Market associations	Economic impacts and opportunities
Community leaders	Community participation and project acceptance
Customers	Tariffs, service quality and grievance management

3.3 Other Interested Parties:

These are individuals, groups, institutions and organisations that may not be directly affected by the Project but have an interest in its implementation, outcomes, performance, or compliance with regulatory and development objectives. These stakeholders play an important role in supporting the successful delivery of the Nigeria Distributed Access through Renewable Energy Scale-Up Project (DARES), providing policy guidance, regulatory oversight, technical expertise, financing, advocacy, market development support, and public accountability.

For DARES, Other Interested Parties include:

Table 5: Other Interested Parties

Stakeholder Group	Interest
REA	Project implementation
Federal Ministry of Power	Sector oversight
State Governments	State energy programmes
NERC	Regulatory compliance
NEMSA	Technical standards
DisCos	Grid integration and interconnected mini-grids
Developers and RESCOs	Investment opportunities
Financial institutions	Financing and market growth
Development partners	Project outcomes
Civil society organisations	Social accountability
Media	Public information dissemination

3.4. Disadvantaged/vulnerable individuals or groups.

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following as shown in table 6 below.

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Table 6: Vulnerable Groups

Category	Method of consultation
Elderly	Recognize their organization and leadership, focus group meetings, assisted transport to meetings
Women	Separate focus group meetings, recognize cultural norms, ensure that community engagement teams are gender-balanced and promote women's leadership.
Youth	Additional focus group meetings
Minority groups	Focus group meetings in a language of their understanding
People with Disabilities	Recognize their organization and leadership, focus group meetings, Assisted transport to meetings

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

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CHAPTER 4

4. STAKEHOLDER ENGAGEMENT PROGRAM

Since the DARES Project became effective in November 2024, the Rural Electrification Agency (REA) has maintained an extensive stakeholder engagement programme to support project implementation and inform the preparation of the proposed Additional Financing (AF). These engagements have enabled stakeholders to provide feedback on project implementation, identify opportunities and risks, strengthen coordination among sector actors, and contribute to the design of the AF.

Stakeholder engagement undertaken during implementation reflects the project's private sector-led delivery model and has involved a broad range of actors across the distributed renewable energy ecosystem. Consultations have been conducted with federal and state government institutions, development partners, regulators, developers, investors, financial institutions, distribution companies (DisCos), public institutions, technical advisers, host communities, beneficiaries, and civil society organisations.

Engagement activities have been conducted through implementation support missions, technical workshops, stakeholder roundtables, bilateral meetings, virtual consultations, community meetings, site visits, sector dialogue sessions, market sounding exercises, and project review meetings. These engagements have focused on project implementation progress, financing requirements, policy and regulatory issues, environmental and social risk management, community engagement, land access arrangements, gender inclusion, grievance management, and opportunities for accelerating access to electricity through distributed renewable energy solutions.

The consultations confirmed strong market demand for expanded support under DARES. Stakeholders broadly supported the proposed scale-up of investments in isolated and interconnected mini-grids, public institution electrification, Solar Home Systems (SHS), productive use of electricity interventions, and Solar for Business initiatives. Stakeholders also emphasised the importance of strengthening community engagement processes, improving coordination with state governments, enhancing grievance management systems, increasing support for vulnerable groups, and maintaining transparent communication throughout implementation.

At the community level, engagement activities undertaken by participating developers have included consultations with host communities, community leaders, landowners, local government representatives, women's groups, youth groups, business associations, educational institutions, and health facilities. These consultations have focused on project awareness, expected benefits, siting of facilities, land requirements, tariff communication, employment opportunities, environmental and social risks, grievance redress mechanisms, and measures to support vulnerable groups

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4.1. Summary of Stakeholder Consultations During Project Implementation and AF Preparation

During preparation of the AF, REA undertook targeted consultations with development partners, investors, developers, state governments, regulators, and project implementation stakeholders to discuss the proposed scale-up of mini-grid and standalone solar interventions, public institution electrification, institutional strengthening activities, and implementation arrangements. Discussions also explored lessons learned from implementation of the parent project, challenges affecting delivery, and measures required to support accelerated deployment under the AF.

During DARES parent implementation and preparation of the DARES Additional Financing (AF), the following public consultation meetings were conducted as shown in table **7**.

Table 7: Summary of Stakeholder Engagement

Date	Location / Mode	Stakeholder Groups	Accessibility / Inclusion Measures	Key Issues and Concerns Raised	Response / Action Taken	Resulting Design Changes or Commitments	Supporting Evidence
21 April 2026	REA Headquarters, Abuja (Physical)	World Bank, IFC, REA, PMU	Physical meeting with direct stakeholder participation	Programme restructuring, availability of financing, implementation progress, risk of funding gaps, need for regular market updates	REA and PMU provided implementation updates and discussed financing outlook and restructuring requirements	Commitment to improve monitoring of fund utilisation and provide regular implementation updates	Meeting records and stakeholder engagement report
17 August 2026	Virtual	World Bank, PMU, DFI Team	Virtual participation enabled attendance from multiple institutions	Additional Financing preparation, project scope, implementation arrangements and timeline for Board approval	Alignment meeting held to discuss AF preparation and implementation planning	Continued preparation of AF documentation and coordination between REA and the World Bank	Meeting records and stakeholder engagement report
22 September 2026	PMU Office, Abuja	PMU, REA, DFI Team	Physical consultation	Updating project instruments to support AF implementation	Environmental and Social instruments identified for revision; procurement requirements reviewed	Update of safeguards instruments including the RPF, SEP and related E&S documents	Meeting records and stakeholder engagement report
2 October 2026	World Bank Office	REA, PMU, World Bank	Physical consultation	Results Framework revisions, implementat	Technical discussions on revised programme	Integration of revised implementation	Meeting records and stakeholde

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				ion targets, projected impacts of AF	targets and implementation scenarios	assumptions into AF planning documents	r engagement report
14 October 2026	Virtual	Investors, Financiers, PMU	Virtual participation to maximise stakeholder access	Programme implementation status, AF opportunities, component structure and financing arrangements	Clarifications provided on AF scope and implementation approach	Continued engagement with financiers to support programme scale-up	Investor roundtable records
24 October 2026	Virtual	Private sector developers, PMU	Virtual participation from developers across project locations	Operational challenges, compliance requirements, implementation progress and AF updates	Programme updates provided and stakeholder concerns addressed	Continued developer engagement and clarification of implementation requirements	Programme roundtable records
June-October 2026	Virtual and Physical	Participating State Governments (Lagos, Kaduna, Delta, Ekiti, Kebbi, Jigawa, Yobe, Borno, Zamfara and Sokoto)	Virtual and hybrid meetings facilitated participation by state officials	Project readiness, commercial frameworks, technical studies, procurement requirements, implementation timelines and state responsibilities	Technical guidance provided and outstanding requirements identified for follow-up	Refinement of project pipelines, commercial frameworks and implementation arrangements under the Subnational Intervention component	State engagement records, meeting summaries, collaboration agreements
February 2026 and ongoing	Public institutions and surrounding communities	Institutional management, staff, students, facility users, host communities, land users, contractors and regulators	Consultation methods included focus group discussions, interviews, questionnaires and stakeholder meetings; attention given to vulnerable groups	Land access, livelihood impacts, compensation, local employment, information disclosure, grievance management and project awareness	Concerns incorporated into safeguards planning and stakeholder engagement measures	Strengthened provisions on land verification, compensation, livelihood restoration, grievance management and information disclosure in the RPF	ESIA consultation records and stakeholder engagement reports

Key issues raised during AF consultations included funding availability and implementation timelines, commercial and technical project frameworks, project readiness requirements, land

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acquisition and land-use verification, livelihood impacts, compensation arrangements, stakeholder communication, grievance management, environmental and social compliance requirements, community engagement, and the need for transparent information disclosure. Participating states requested continued coordination on project preparation activities, while developers sought clarification on safeguards requirements, land acquisition procedures, grievance management processes, and environmental and social documentation requirements. Public institution stakeholders highlighted concerns relating to land access, livelihood impacts, compensation, local employment opportunities, information disclosure, and security of project assets.

Stakeholder feedback generated during implementation and AF preparation has informed the revision of this SEP and will continue to guide project implementation under the AF. Engagement activities will be maintained throughout the project lifecycle, including during screening, preparation of site-specific environmental and social instruments, construction, operation, monitoring, and project completion.

4.2 Information Disclosure Strategy

The project will disclose information throughout implementation in a timely, understandable, and accessible manner consistent with ESS10 requirements and applicable national regulations.

Information will be disclosed in English and, where necessary, translated into local languages commonly used within project areas. Information disclosure methods will be selected to ensure broad accessibility, particularly for vulnerable and disadvantaged groups.

Project information that may be disclosed includes:

- Project description and objectives;
- Environmental and social instruments;
- Stakeholder Engagement Plan (SEP);
- Labour Management Procedures (LMP);
- Site-specific Environmental and Social Management Plans (ESMPs);
- Resettlement instruments where applicable;
- Grievance Redress Mechanism procedures;
- SEA/SH prevention and response protocols;
- Consultation reports;
- Monitoring and evaluation reports;
- Project progress updates.

Table 8: Information Disclosure Plan

Information to be Disclosed	Target Audience	Disclosure Method	Timing
Stakeholder Engagement Plan	All stakeholders	REA website, public disclosure, stakeholder meetings	Following World Bank clearance and throughout implementation

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Environmental and Social Instruments	Communities, regulators, CSOs and affected persons	REA website, community disclosure meetings, public notices	Prior to commencement of relevant activities
Grievance Mechanism Procedures	All stakeholders	Community meetings, brochures, posters, website	Before implementation and continuously thereafter
Project Updates and Progress Reports	All stakeholders	Website, newsletters, workshops, social media	Quarterly
Community-Level Notices	Host communities	Notice boards, community meetings, local radio	As required
Consultation Outcomes	Participants and affected stakeholders	Consultation reports and stakeholder meetings	Following consultations
Monitoring Reports	Development partners, government agencies and stakeholders	Periodic reporting and meetings	Annually and as required
SEA/SH Awareness Information	Communities, workers and vulnerable groups	Training, awareness campaigns, printed materials	Throughout implementation

4.3. Disclosure Timing

The updated SEP and all applicable environmental and social instruments will be disclosed following World Bank clearance and prior to commencement of AF-supported activities. REA will disclose documents through its website, stakeholder meetings, public notices, and other appropriate communication channels. Adequate time will be provided for stakeholders to review disclosed documents and provide feedback before implementation of relevant activities.

The environmental and social reports and plans The E&S documents for the parent DARES have been disclosed. The E&S instruments for the AF will be disclosed following WB clearance and prior to commencement of AF supported activities.

4.4. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement.

Different engagement methods are proposed and cover different stakeholder needs as stated below: International standards increasingly emphasize the importance of a consultation being ‘free, prior and informed’, which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. In order to fulfil this requirement, a range of consultation methods are applied

A summary description of the engagement methods and techniques that will be applied by the Nigeria DARES Program is provided in table 9 below while table 10 describes in detail the Methods/Tools for Information Provision, Feedback, Consultation and Participation. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

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Table 9: Engagement Techniques

TECHNIQUE	MOST APPROPRIATE APPLICATION OF TECHNIQUE
Information Centre and Information Boards	• Establish Information Boards in each Project area community.
Correspondence by phone/email/ Text/Instant messaging	• Distribute project information to government officials, organizations, agencies and companies. • Invite stakeholders to meetings
Print media and radio announcements	• Disseminate project information to large audiences, and illiterate stakeholders. • Inform stakeholders about consultation meetings
One-on-one interviews	• Solicit views and opinions. • Enable stakeholders to speak freely and confidentially about controversial and sensitive issues. • Build personal relations with stakeholders. • Recording of interviews
Formal meetings	• Present project information to a group of stakeholders • Allow the group of stakeholders to provide their views and opinions. • Build impersonal relations with high level stakeholders. • Distribute technical documents. • Facilitate meetings using PowerPoint presentations. • Record discussions, comments/questions raised and responses
Public meetings	• Present project information to a large audience of stakeholders, and in particular communities • Allow the group of stakeholders to provide their views and opinions. • Build relationships with local communities. • Distribute non-technical project information. • Facilitate meetings using PowerPoint presentations, posters, models, videos and pamphlets or project information documents. • Record discussions, comments/questions raised and responses
Workshops	• Present project information to a group of stakeholders • Allow the group of stakeholders to provide their views and opinions. • Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies. • Recording of responses
Focus group meetings	• Allow a smaller group of between 8 and 15 people to provide their views and opinions of targeted baseline information. • Build relationships with local communities. • Use a focus group interview guideline to facilitate discussions. • Record responses
Surveys	• Gather opinions and views from individual stakeholders. • Gather baseline data. • Record data • Develop a baseline database for monitoring impacts

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Table 10: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Information Provision					
Distribution of printed public materials: leaflets, brochures, fact sheets	To convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	Printed materials to present illustrative and written information on the DARES project including the PIP among others. Presented contents are concise, clear and easy to understand by a layperson. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders. Conduct a workshop to develop standard messages for campaigns and interventions to be used for priority target audiences Conduct mass media campaigns both at national media and local stations Conduct social media campaign on (Facebook, Twitter, YouTube, WhatsApp, etc.). Preparing briefs for policymakers, web pages for the general public, guides for technical staff, reports or videos to local stakeholders (e.g., village committees) and project participants.	Government Ministries, Departments and Agencies at state and Federal levels All project affected parties Project interested parties Other potential stakeholders Project developers, Media personnel, CSOs/CBOs/NGOs	At regular intervals during Project preparation, Implementation and closure At regular intervals during Project preparation, Implementation and closure
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, electronic subscription, delivery in person. The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can	All projected affected parties All project interested parties Implementing Agencies and Partners Government Ministries, Departments and Agencies	Quarterly through the life cycle of the Project

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
			fill in a return to the Project's specified address.		
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the stakeholders.	Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience. Arrange for outdoor advertising.	All projected affected parties All project interested parties Other potential stakeholders	On commencement of specific activities
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV. Presentations at village level	Description of the Project, Project development update and processes. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences. Documentary campaign at national and state stations on impact and success story in local communities Production of musical sting for to be used in sponsored radio programmes	Government Ministries, Departments and Agencies Implementing agencies and partners All projected affected parties All project interested parties Other potential stakeholders	10 minutes weekly updates
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project activities, processes and timeline. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders. Video simulation animations	Participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Government Ministries, Departments and Agencies	On a need basis
Notice/disclosure boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	All projected affected parties All project interested parties Other potential stakeholders	Regularly
Information Feedback					
Information repositories accompanied	Placement of Project-related information and printed materials in dedicated/designated locations that	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the	All projected affected parties	Weekly update

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
by a feedback mechanism	also provide visitors and readers with an opportunity to leave their comments in a feedback register.		duration of a disclosure period or permanently. Audience is also given free access to a register of comments and suggestions.		
Dedicated telephone line (hotline)(toll free)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations, social and environmental protection.	Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	Any project stakeholder and interested parties.	Available all through the project cycle
Internet/Digital Media	Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Website should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in English	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	A link to the Project website should be specified on the printed materials distributed to stakeholders. Other online based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.	Project stakeholders and other interested parties that have access to the internet resources.	Available all through the project cycle
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project and related processes. Questions targeting stakeholder perception of the Project,	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	All project affected parties.	

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
		associated impacts and benefits, concerns and suggestions.			
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Project affected parties, especially vulnerable groups.	
Consultation & Participation					
Public hearings State and National Assembly	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project, and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	Project affected parties Relevant government Ministries Departments and Agencies. NGOs and civil societies Other interested parties	On a need basis
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, processes that require detailed discussion with affected stakeholders.	Announcements of the Forthcoming meetings are widely circulated to participants in advance (at least two weeks). Targeted invitations are sent out to stakeholders.	All project affected parties especially vulnerable groups; Project delivery agencies DARES employees and contractors NGOs and civil societies	On a need basis

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
				Implementing Agencies and Partners Relevant Government Ministries and Agencies	
Household visits	Household-level visits can be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from affected people and vulnerable persons who may be unable to attend the formal hearings	- Description of the Project and related solutions/impact management measures - Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	- Visits should be conducted by designated staff with specified periodicity	Directly affected people	On a need basis
Information centers and field offices	The project's designated venue for depositing Project related information also offers open hours to the community and other members of the public, with Project staff available to respond to queries or provide clarifications.	Project-related materials, including updates of project status - Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the information center/field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits	Directly affected communities and any other stakeholders and interested parties	
Site Tours	Visits to project sites and facilities organized for local communities, authorities, and the media to demonstrate Project solutions. - Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour - Could be in conjunction with meeting	Demonstration of specific examples of the Project's design solutions and approaches to managing impacts.	Targeted invitations were distributed to selected audiences offering an opportunity to participate in a visit to the Project Site. Limitation: possible safety restrictions on the site access during active construction works	Local communities - Elected officials - Media groups - NGOs and other initiative groups	

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Table 11: Stakeholder Engagement Plan (SEP)

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Design	Before commencing key project and ongoing	Need for the project; Ongoing and planned activities; Presentation of the project ESMF, RPF, SEP. GM and LMP	One-on-one meetings, Formal meetings, Focus group meetings Workshops, Field visit, Radio/TV	Government Officials; Government Institutions: Private sector developers, project beneficiaries, PAPs	Environmental and Social Safeguard Specialists Project Engineer Project Manager Project coordinator
Construction	Throughout implementation of parent project and Additional Financing-supported activities	Construction and installation activities relating to mini-grids, standalone solar systems, productive-use installations, public institution electrification, contractor mobilization, environmental and social risk management, labour management procedures, health and safety requirements, SEA/SH prevention measures, community health and safety, and grievance management.	Meetings, Presentations, Information boards, during disclosure of relevant instruments; ESIA, ESMP	General Public: project beneficiaries, PAPs, Contractors. Government officials and government Institutions:	Environmental and Social Safeguard and Gender Based Violence Specialist, Officers and Project site engineer
Operation	On sites	Operational performance of energy systems, customer service standards, tariff communication, preventive maintenance,	Public meetings Site visits.	Beneficiary communities, Contractors	Environmental and Social Safeguard Specialists and Officers

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		consumer protection, community health and safety, operation of the grievance mechanism, beneficiary satisfaction monitoring, and continued stakeholder engagement throughout the operational phase.			
Decommissioning	After design life span	Decommissioning planning, stakeholder consultation, environmental restoration, waste management, recycling and disposal of equipment, labour transition arrangements, community health and safety considerations, asset retirement procedures, management of residual environmental and social risks, and closure of grievance records .	Meetings	Beneficiary Communities, Local government,	Environmental and Social safeguard Specialists and Officers, Project Coordinator, Project Engineers

Information disclosure is an important component of stakeholder engagement and will be undertaken throughout the project lifecycle in accordance with the World Bank Environmental and Social Standard (ESS10) and applicable national regulatory requirements. The objective of information disclosure is to ensure that stakeholders have timely access to relevant, accurate and understandable information concerning the Project, its potential benefits and risks, environmental and social management measures, grievance mechanisms, and opportunities for participation.

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Disclosure activities under the Project will consist of both: (i) disclosure required by applicable national laws and regulations, including environmental and social assessment requirements and public consultation processes; and (ii) proactive disclosure undertaken by the Project to ensure that stakeholders are adequately informed and able to participate meaningfully in project planning and implementation. These disclosure activities support transparency, accountability, stakeholder confidence, and informed participation in project decision making processes.

As a standard practice, this SEP in English and relevant local language will be released for public review for a period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English and relevant local language will be made accessible for the general public at the following locations:

- Federal Ministry of Finance Budget and National Planning (FMoF)
- Federal Ministry of Power (MOP)
- Rural Electrification Agency (REA)
- Nigerian Electricity Regulatory Commission (NERC)
- Eleven Distribution Companies (DISCOs)
- Nigerian Electricity Management Services Agency (NEMSA).
- The EA Department of the Federal Ministry of Environment; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of the Bank and the Rural Electrification Agency (REA) website. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other interested parties. Translation of the executive summaries in relevant local language and its posting in the designated community centres.

Table 12 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 12: Stakeholder Engagement and Disclosure Methods

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Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Project Affected Parties	• Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development.	• Public/Disclosure notices at Community level. • Electronic publications and press releases on the Project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures. • Separate focus group meetings with vulnerable groups, as appropriate.
Non-governmental Organizations	• Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development.	• Public notices. • Electronic publications and press releases on the project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures.
Ministries, Departments and Agencies	• Stakeholder Engagement Plan • PIP update • Regular updates on Project development • Additional types of Project information if required for the purposes of regulation and permitting.	• Dissemination of hard copies of the SEP
Implementing Agency(Project developers/construction companies	• Stakeholder Engagement Plan • PIP updates • Regular updates on Project development • Additional types of Project information if required for the purposes of implementation and timeline.	• Public Notices • Consultation Meetings • Information leaflets and brochures. • Electronic publications and press releases on the project website.
Related businesses and enterprises	Stakeholder Engagement Plan. Public Grievance Procedure. Updates on Project development and tender/procurement announcements.	• Electronic publications and press releases on the Project website. • Information leaflets and brochures. • Procurement notifications.
Project Employees	Employee Grievance Procedure. Updates on Project development.	• Staff handbook. • Email updates covering the Project staff and personnel. • Regular meetings with the staff.

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Stakeholder Group	Project Information Shared	Means of communication/ disclosure
		• Posts on information boards in the offices and on site. • Reports, leaflets.

4.5. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress by the Rural Electrification Agency.

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CHAPTER 5

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The PMU domiciled in the REA will be in charge of stakeholder engagement activities.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating PMU domiciled in REA and local sub-contractors.

Where additional stakeholder engagement capacity is required, REA may engage qualified civil society organisations, independent facilitators, or stakeholder engagement specialists. Funding for such services has been provided under the budget line item "Independent Facilitation and Technical Support" included in the SEP implementation budget.

The roles and responsibilities of the organizations are presented below in Table 13 for The Project Implementation Unit (PMU) DARES Project

Table 13: Organizational Roles and Responsibilities

Role	Responsibility / Accountability
National Project Coordinator at the PMU and a dedicated team comprising of: Research and Development, Project Manager, Procurement Officer, Social Development Officer, and an Environmental Officer	• Formalise and fulfil roles and responsibilities for the effective functioning of coordination at all levels and establishing institutional partnerships for coordination. • Ensure proper implementation and follow-up of the SEP. • Develop an implementation plan across the DARES, with explicit objectives, activities, and monitorable deliverables that can guide the work of both technical and oversight committees. • Provide capacity development for effective coordination. • Allocate funding for committee meetings at all levels. • Ensure that contractors and DARES employees are informed and trained on the SEP. • Ensure the DARES environmental and Occupational Health and Safety Specialist and a Social Specialist team report on time and with the expected and agreed points. • Provide resources to ensure that the interests of stakeholders are represented and taken into consideration during the implementation of subprojects.
National Project Coordinator & Procurement Specialist. Social Specialist	• Ensure that employees and subcontractors have in their contracts a stakeholder engagement/community relations management clause and they are aware and trained on the SEP. • Coordinate required SEP support and training for staff in coordination with environmental and Occupational Health and Safety Specialists and a Social Specialist team and a Human Resources Manager.

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Role	Responsibility / Accountability
• Environmental and Occupational Health and Safety Specialist • Social Specialist	**Social Development Specialist:** As the primary interface between the Project and stakeholders, including the local community, the Social Specialist will: Develop, implement, and monitor all stakeholder engagement strategies/plans for the Project. • Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement. • Proactively identify stakeholders, project risks, and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities. • Lead the SEP from the sponsor perspective and coordinate the results and actions to be taken with the H&S and Environmental Manager and later with the DARES Team. • Review the SEP viability with the H&S and Environmental Specialist. • Manage the grievance mechanism. • Lead day-to-day implementation of the SEP and Community Grievance Mechanism, including proactively maintaining regular contact with affected communities through regular community visits to monitor opinions and provide updates on Project activities, and ensure communication with vulnerable groups. • Produce stakeholder engagement monitoring reports and submit them to the National Project Coordinator. • Supervise/monitor and coordinate activities to ensure that staff and all sub-contractors comply with the SEP. • Manage the day-to-day working, utilization, and implementation of SEP by all parties engaged in the Project. **Environmental Occupational Health and Safety Specialist:** • Review the SEP ensuring compliance in terms of environmental, and H&S requirements and provide feedback to the social specialist. • Responsible for the consultations and implementation of this SEP on environmental issues
Seconded staff, IVA consultants, and other relevant agencies	• Comply with requirements stated under this document - non-compliance will be treated as a disciplinary matter. • Provide assistance if needed to ensure compliance with this plan. • Perform assigned tasks toward meeting SEP objectives. • Communicate concerns, questions, or views to their supervisor or the compliance or implementation of the SEP. • Provide data related to SEP performance/monitoring as required.

In order to advance the DARES Project, coordinate overall procurement, perform audits, provide financial reports, conduct stakeholder engagement, project disclosure, and outreach, and ensure the availability of resources, the PMU will work collaboratively with the Federal Ministry of Finance Budget and National Planning (FMoF) and Federal Ministry of Power (FMoP) on a need basis.

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The proposed annual SEP budget of **US$387,000** reflects the national scope of DARES and the expanded activities introduced under the Additional Financing. The allocation prioritises community level engagement, stakeholder inclusion, grievance management, information disclosure, capacity building and citizen engagement. The budget has been structured to address World Bank review comments by clearly linking each cost item to a specific stakeholder engagement activity, removing obsolete procurement items, and providing dedicated resources for vulnerable group engagement, SEA/SH awareness, monitoring, reporting and grievance redress. This level of investment is considered proportionate to the size, geographic coverage and stakeholder complexity of the Project.

Table 14: Proposed Budget Line Items for Stakeholder Engagement

Budget Activity	Annual Budget (US$)	Basis for Cost Estimate	Justification and Intended Use
National Stakeholder Consultation Forums	25,000	Four national stakeholder forums annually involving federal agencies, development partners, regulators, developers and CSOs	Covers meeting logistics, facilitation, documentation, communication materials and stakeholder participation. These forums provide strategic guidance and facilitate dialogue on project implementation, environmental and social performance, AF implementation and emerging issues.
State-Level Stakeholder Engagement Meetings	40,000	Quarterly engagements across participating states	Supports coordination meetings with state governments, local authorities, DisCos, community representatives and implementing partners. These consultations strengthen state-level ownership and implementation support.
Community Sensitisation and Consultation Activities	75,000	Continuous consultations across multiple project sites and communities	Funds town hall meetings, focus group discussions, community mobilisation, stakeholder mapping, consultation materials and local facilitators. This is the largest budget item because community engagement forms the core of ESS10 compliance.
Stakeholder Information Materials	12,000	Annual production and distribution of communication materials	Covers design, printing and dissemination of brochures, fact sheets, flyers, posters, grievance awareness materials and stakeholder information packages.
Translation and Interpretation Services	8,000	Multiple stakeholder engagements requiring local language communication	Supports translation of SEP summaries, environmental and social instruments, grievance awareness materials and interpretation services during consultations to ensure inclusiveness and accessibility.

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Website Management and Information Disclosure	5,000	Continuous disclosure obligations throughout implementation	Covers uploading and maintaining public access to project documents, consultation reports, SEP updates, environmental and social instruments and implementation progress information.
Community Radio Programmes and Media Engagement	15,000	Public awareness campaigns in participating states	Supports radio programmes, media briefings, public announcements and awareness campaigns to promote project transparency and ensure broad stakeholder outreach.
Vulnerable Group Engagement Activities	20,000	Dedicated consultations and outreach activities	Funds targeted engagement with women, persons with disabilities, youth, elderly persons, female-headed households and underserved populations to ensure their effective participation in project decision-making processes.
Gender and SEA/SH Awareness Activities	15,000	Continuous awareness and prevention activities	Covers stakeholder training, community awareness campaigns, dissemination of referral pathways and information materials supporting gender inclusion and SEA/SH risk mitigation.
Capacity Building for REA Staff	10,000	Two structured training programmes annually	Supports training on ESS10 implementation, stakeholder engagement, grievance management, disclosure obligations, monitoring and reporting requirements.
Capacity Building for Developers and Contractors	20,000	Multiple workshops and implementation support sessions	Provides training on community engagement, environmental and social requirements, grievance management, consultation documentation and stakeholder communication responsibilities.
Training of Community Grievance Committees	10,000	Community-level grievance structures established across project locations	Supports training in grievance registration, mediation, documentation, reporting and conflict resolution to strengthen local grievance handling capacity.
Grievance Redress Mechanism Operations	15,000	Project wide GRM operational throughout implementation	Covers maintenance of complaint registers, grievance tracking systems, communication costs, investigations, reporting and administration of the project grievance mechanism.
Community Grievance Committee Support	15,000	Operational support for local grievance structures	Supports committee meetings, logistics, record keeping and local dispute-resolution activities to ensure timely handling of concerns at community level.
Stakeholder Satisfaction Surveys	10,000	Annual beneficiary perception assessments	Funds stakeholder and beneficiary surveys used to evaluate consultation effectiveness, project satisfaction levels

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			and performance of engagement mechanisms.
Participatory Monitoring Activities	10,000	Community-based monitoring and review meetings	Supports community scorecards, monitoring visits, beneficiary feedback sessions and stakeholder-led monitoring initiatives to strengthen accountability.
SEP Monitoring and Reporting	10,000	Quarterly and annual reporting requirements	Covers data collection, analysis, preparation of SEP implementation reports, documentation of consultations and compliance reporting to the World Bank.
Independent Facilitation and Technical Support	20,000	Specialist support engaged as required	Provides resources for independent facilitators, conflict resolution specialists or stakeholder engagement experts when complex consultations or disputes require additional expertise.
Contingency (Approx. 10%)	32,000	Provision for unforeseen implementation requirements	Ensures flexibility to respond to additional consultations, unanticipated stakeholder concerns, AF-related scale-up activities, inflationary pressures and emerging engagement needs.
TOTAL ANNUAL SEP BUDGET	**387,000**		The proposed budget is considered proportionate to the national scale of DARES, the expanded scope under the Additional Financing, and the stakeholder engagement requirements necessary to maintain compliance with ESS10 throughout project implementation.

5.2. Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are dedicated team members within the PMU domiciled in REA and local contractors.

The stakeholder engagement activities will be documented through:

- Attendance list in order to record all participants.
- Taking written minutes of the meeting by a specially assigned person or a secretary
- audio recording (e.g., by means of voice recorders) and
- Photographing.

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, a video recording may also be undertaken. The combination of these methods ensures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

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CHAPTER 6

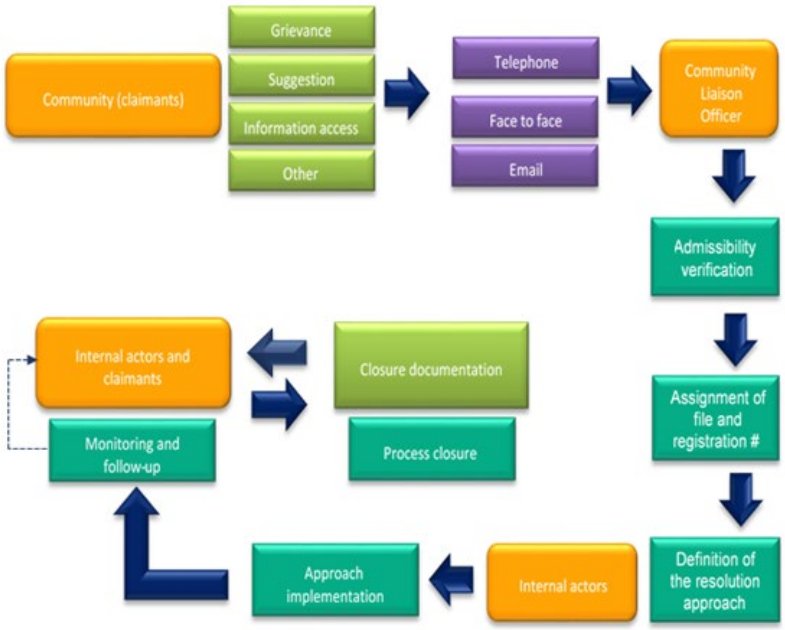
6. Grievance Mechanism

The main objective of a GM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

6.1. GRIEVANCE MANAGEMENT

In compliance with applicable local and national laws and the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. This process is specially designed to collect, collate, review, and redress stakeholders' concerns, complaints, and grievances. This process will be carried out using dedicated communication materials (specifically, a GM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures This procedure is seen as an important pillar of the stakeholder engagement process since it creates opportunities stakeholders and communities to identify problems and discover solutions together (IFC, 2009). A grievance can be defined as "a real or imagined cause for complaint." It may be expressed formally or informally. They are usually related to alleged or potential risks and adverse impacts associated with an operation, an alleged noncompliance with a project commitment, or to matters concerned with employment and working conditions.

Figure 2: Grievance Mechanism flowchart



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6.2. Description of Grievance Mechanism

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint once all possible means to resolve the complaint have been proposed.

Table 15: Grievance Management Process

Process	Description	Time Frame	Other Information
Identification of grievance	Face to face; phone; letter; mail; e-mail; website; recorded during public/ community interaction; others. The responsible party to receive the grievances will be REA and the subproject implementers. The grievance can also be passed through other parties, such as the chief office because the public is more conversant with this office. The grievance receiver would then pass the complaint to the REA contact person	1 Day	Email address; hotline number
Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e., in a logbook) It will be prudent to have a grievance record book where the grievances are recorded for follow-up	3-6 Days	Significance criteria: Level 1 –one-off event. Level 2 – complaint is widespread or repeated. Level 3- any complaint (one-off or repeated) that indicates a breach of law/ policy
Grievance is acknowledged	Acknowledgement of grievance through appropriate medium	3 Days	
Development of response	The grievance is assigned to the appropriate party for resolution. Response development with input from management/ relevant stakeholders	4-8 Days	
Response signed off	Redress action approved as appropriate	8-15 Days	
Implementation /communication	Redress action implemented and update of progress on resolution communicated to the complainant	5-9 Days	

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of response			

6.3. Grievance Mechanism (GM)

Project-affected people and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Mechanism (GM). The overall objectives of the GM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to specifics in program components.
- Strengthen accountability to beneficiaries, including project-affected people.

The GM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. Stakeholders can use the GM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the program as it affects them. The GM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by the participating developers for each project site. If the developer is not successful in resolving the grievance, the grievance will be escalated to the DARES PMU's grievance unit of the REA as appropriate. All grievances that cannot be resolved at that level shall be allowed to go to a court of law.

6.4 Grievance Framework

Information about the GM will be publicized as part of the initial program consultations and disclosure to all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project management unit offices, notice boards available to strategic stakeholders, etc. Information about the GM will also be posted online at the implementing agencies' websites.

The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievances resolution process.

- ***Step 1: Uptake.*** Project stakeholders will be able to provide feedback and report complaints through several channels such as filling up grievance forms, reporting grievances to implementing agencies, submitting grievances via email addresses made available by the implementing units, and via the implementing institutions' website collection boxes stipulated for the grievance uptake.
- ***Step 2: Sorting and processing.*** Each unit/department of the implementing institutions will conduct prompt sorting and processing of all grievances. The process will involve the internal escalation process to specific desks to review, resolve, and respond to grievances raised.

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- ***Step 3: Acknowledgement and follow-up.*** Within three (3) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to the complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.
- ***Step 4: Verification, investigation and action.*** This step involves gathering information about the grievance to determine the facts surrounding the issue, verifying the complaint's validity and then developing a proposed resolution. It is expected that many or most grievances will be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- ***Step 5: Monitoring and evaluation.*** Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency would develop and maintain a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- ***Step 6: Providing Feedback.*** This step involves informing those who have raised complaints, concerns, or grievances about the resolutions to the issues they have raised. Whenever possible, complainants should be informed of the proposed resolution in person, which gives them the opportunity to ask follow-up questions that could be answered on the spot for total resolution. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through a court of competent jurisdiction.

6.5 DARES Grievance Escalation Process

The GM provides for different ways in which users can submit their grievances, which may include the following channels:

- Toll-free telephone hotline/Short Message Service (SMS) line: 080020202020
- E-mail: nep@rea.gov.ng , grievance.nep@rea.gov.ng
- Letter to Grievance focal points at local facilities
- Complaint form to be lodged via any of the above channels.
- Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box

6.6. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)

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In addressing SEA/SH risks, the DARES will use the three key guiding principles (confidentiality, informed consent, and survivor safety) of the survivor-centered approach to systematically and adequately respond to the specific nature of SEA/SH cases.

All complaints related to GBV shall be treated in a private and confidential manner, limiting information to what the survivor or complainant is freely willing to provide. A separate register shall be opened for this category of cases and shall ONLY be accessed by the community-based GC secretary, the GM coordinator at the PMU (and any female GC member empowered to handle GBV cases where the Chairman and Secretary are all male). The complainant (if a survivor) shall be attended to with empathy, assurance of safety, and confidentiality. In the event that the complainant is not willing to divulge any information, this view should be respected by the GM officer, and the complainant should be referred to the appropriate nearest medical center, approved available GBV service provider or police, depending on the complainant's choice. Such a complaint should be reported to the World Bank Task Team as well by the PMU GC.

If the complainant is still not satisfied, then they should be advised of their right to legal recourse.

For SEA/SH complaints, the GM will link the project grievance mechanism to an existing service provider to handle SEA/SH allegations. If a SEA/SH allegation report is received through the formal grievance mechanism, the GM operator refers the matter to the intermediary. The intermediary will provide immediate support services in its sphere of competencies, such as health or psychological support, and then refer the survivor to other relevant GBV service providers and coordinate with the project GM operator on the survivor's behalf with the survivor's consent.

If the survivor gives consent, the second action for the GM operator is to communicate the allegation to a specially constituted SEA/SH grievance committee comprising representatives of the client, consultant, contractor, and local service providers that are charged with monitoring SEA/SH response. The allegation is reviewed, and a determination is made regarding the likelihood of the allegation being linked to the project. The intermediary is responsible for informing the GM operator of all SEA/SH allegations that have been identified as originating from the project, such as those against contractors, workers, or consultants, with the consent of the survivor.

In this way, the PMU and the World Bank can be kept apprised and appropriate action can be taken if the alleged perpetrator is linked to project activities and if the survivor wants to seek disciplinary action. If the SEA/SH allegation is linked to a World Bank-financed project but the survivor does not want to submit a grievance with the alleged perpetrator's employer, the intermediary only shares information with the GM operator about the survivor's age, sex, and the fact that he or she does not choose to proceed with accountability processes.

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Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may complain as outlined in the DARES labor grievance mechanism in the DARES LMP. Workers can also complain directly to the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English.

6.7 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may complain as outlined in the DARES labour grievance mechanism in the DARES LMP. Workers can also complain directly to the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English.

- A complaint can be submitted to the Bank through the World Bank Nigeria Country Office in Abuja: 102 Yakubu Gowon Crescent, Asokoro, Abuja

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

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CHAPTER 7

7. Monitoring and Reporting

Monitoring and reporting will assess the effectiveness, inclusiveness, accessibility, responsiveness, and outcomes of stakeholder engagement activities throughout project implementation. Monitoring information will be collected through consultation records, attendance registers, grievance logs, disclosure records, beneficiary surveys, stakeholder feedback mechanisms, community monitoring activities, and periodic implementation reviews. Findings will inform adaptive management and continuous improvement of stakeholder engagement practices.

7.1. Summary of how SEP implementation will be monitored and reported.

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of the Nigeria DARES Project implementation in order to ensure that the information presented herein is consistent and is the most recent and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the project context and specific stages of the implementation. Any major changes to the project-related activities and to its schedule will be duly reflected in the SEP. This includes regular refreshers to stakeholders about the grievance mechanism and related processes and regular Project Monitoring reports and reporting to the different stakeholders as appropriate.

7.2 Reporting

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- During the engagement activities short-term monitoring to allow for adjustments/improvements shall be made during engagement; and
- Following completion of all engagement activities, a review of outputs at the end of the engagement to evaluate the effectiveness of the SEP as implemented will be conducted.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 16 shows the indicators, and performance against the indicators to show successful completion of engagement tasks.

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Table 16: Key Performance Indicators by Project Phase

Indicator	Target
Percentage of planned stakeholder consultations completed	≥95%
Percentage of affected communities consulted prior to site confirmation	100%
Percentage of women participating in consultations	≥40%
Percentage of vulnerable group participation in consultation activities	Tracked and reported quarterly
Percentage of grievances acknowledged within 3 working days	100%
Percentage of grievances resolved within approved timelines	≥80%
Percentage of SEA/SH related complaints referred within 24 hours	100%
Percentage of required disclosures completed before commencement of activities	100%
Stakeholder satisfaction rate with engagement activities	≥75%
Number of community monitoring meetings conducted annually	Minimum 4 per site
Number of SEP monitoring reports produced annually	4 quarterly and 1 annual report
Percentage of corrective actions arising from stakeholder feedback implemented on schedule	≥90%

7.3. Stakeholder Involvement in Project Monitoring

The involvement of project-affected stakeholders in the monitoring process will promote transparency and support in addressing stakeholder concerns. Stakeholder participation in monitoring can also empower communities as it enables them to have a role in addressing Project-related issues that affect their lives. This, in turn, strengthens relationships between the Project and its stakeholders.

Stakeholder involvement in monitoring of this Project will include the following:

- Involvement of affected stakeholders when selecting sampling methods for any social surveys or external impact assessments, and in the analysis of results. Training will be conducted where needed.
- Participation in community scorecard exercises, beneficiary feedback sessions, and other participatory monitoring mechanisms established by the Project.
- Review of grievance trends, grievance resolution performance, and stakeholder satisfaction with grievance outcomes through periodic stakeholder meetings.
- Involvement of stakeholder representatives in validation meetings to review monitoring and audit activities, discuss implementation challenges, and provide feedback on proposed corrective actions.
- Grievance follow-up meetings and calls with affected stakeholders.

Information generated through these monitoring activities will be documented, reviewed by the Rural Electrification Agency (REA), and used to improve project implementation, strengthen stakeholder engagement processes, and enhance overall project performance.

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7.4. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary during the project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways:

Table 17: Outline of Reports to Stakeholders

Report	Content	Stakeholder	Frequency
Technical reports (Financial, Occupational Safety and Health Report, Environmental and Social Audit, Personnel)	Technical Evaluation of the Project Status	Regulatory authorities	At agreed timeline
Progress Update Reports and Annual Report	• Project development activities, • Challenges and opportunities, • local workers hiring status	• REA • World Bank	Quarterly, six months after the effectiveness date and other agreed timeline
Media release	Main Project milestones	Local media (and national media as appropriate)	At agreed timeline

Conclusion

The DARES Project recognises that meaningful stakeholder engagement is essential to successful implementation and long-term sustainability. The Project will continue to engage affected communities, beneficiaries, public institutions, developers, regulators, civil society organisations, development partners, and vulnerable groups throughout the Project lifecycle. Through implementation of this SEP, DARES commits to transparency, accessibility, accountability, inclusion, and continuous dialogue to ensure that stakeholder concerns are addressed in a timely manner and that project benefits are delivered in a socially sustainable and equitable way.

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Annexes

Report of Stakeholder Engagement Activities Undertaken During DARES Implementation

Component: **Project Development Unit**
Reporting Period: **April 2026 to date**
Prepared by: **DFI Coordinator & Private Sector Relations Specialist**
Date : **26/10/2026**

Date of ɣagement	Purpose of Engagement	Location	Stakeholder groups	Method of Engagement	Summary of Key Issues/Feedback	Follow up Action/Next Steps	Su Do
;day l 21 2026	DARES Mission: Kick-off meeting	REA HQ	World Bank, REA, IFC	Physical discussion	-Overall update on implementation progress -DARES appraisal; component restructuring and PBCs -Programme restructuring to accommodate $49.1m US DOJ and $193.8m JICA funds -Update market on availability of funds frequently -Status of available funding and likelihood of implementation being stalled with projected disbursement	PMU to highlight burn rate to estimate when funds could run out	Nil
ɹy ɹust 14 ;	Formal correspondenc e from the World Bank on additional financing	N/A	World Bank, PMU	Email	- PMU informed World Bank that FGN had approved additional financing for DARES -To request a meeting with the PMU to align on proposed allocations across program components	PMU confirmed its availability Monday 17 August	Nil

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MSI IMG PRE-AGREEMENT ALIGNMENT MEETING [BEIJING EASTWEST ENERGY]

REA RURAL ELECTRIFICATION AGENCY

THE WORLD BANK

LOT 8

ATTENDANCE

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4	Adejoke Odumosu	REA	PEA	08134985157	adejoke.odumosu@rea.gov.ng	
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14	Stanley Onwunumah	REA-NEP	PM Isolated Mini-grid	08160562726	stanley.onwunumah@rea.gov.ng	
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MST / IMG PRE-AGREEMENT ALIGNMENT MEETING [PARAS ENERGY LTD]

RURAL ELECTRIFICATION AGENCY

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ATTENDANCE

S/N	NAME	COMPANY / ORGANIZATION	Designation	Phone Number	Mail	Signature
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3	Bello Lawrence Gozi	Paras Energy	Business Development	08145186702		
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5	Austin Ugbor	"	P & IT Engr	08066994464		
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REA — RURAL ELECTRIFICATION AGENCY

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LOT 9

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LOT 485

THE WORLD BANK

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INVITATION TO STATES ROUNDTABLE FOR THE MST IMRG UNDER THE DARES PROGRAMME

RURAL ELECTRIFICATION AGENCY

THE WORLD BANK

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NIGERIA ELECTRIFICATION PROGRAMME

ATTENDANCE SHEET

EVENT: Clarification Meeting with Delta State

VENUE: Board room

DATE: 24th September, 2026

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