



STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

THE

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

September, 2023

Table of Contents

Contents

Table of Contents	ii
List Of Tables.....	iv
LIST OF ACRONYMS AND ABBREVIATIONS	v
Executive Summary	6
ES2- KEY NATIONAL LEGAL PROVISIONS FOR CITIZEN ENGAGEMENT	7
ES3: STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	7
ES4: STAKEHOLDER ENGAGEMENT PLAN.....	8
ES5-RESOURCES AND RESPONSIBILITIES	8
ES6- GRIEVANCE MANAGEMENT.....	9
ES7- MONITORING AND REPORTING	9
1. Introduction/Project Description	11
2. Objective/Description of SEP	17
2.1 Key National Legal Provisions for Citizen Engagement	17
2.1.1 The Freedom of Information Act 2011	17
2.1.2 Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004	17
2.1.4 Other Legal Provisions on Stakeholder Engagement and Disclosure	18
2.2 World Bank Environmental and Social Standard on Stakeholder Engagement	18
3. Stakeholder identification and analysis.....	20
3.1 Methodology	20
3.2. Affected parties and other interested parties.....	20
3.3. Disadvantaged/vulnerable individuals or groups.....	21
4. Stakeholder Engagement Program	22
4.1. Summary of stakeholder engagement done during project preparation.....	22
4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement	23
Table 5: Stakeholder Engagement Plan (SEP).....	30
4.4. Reporting back to stakeholders	33
5. Resources and Responsibilities for implementing stakeholder engagement activities	34
5.1. Resources	34
5.2. Management functions and responsibilities	36
6. Grievance Mechanism.....	37
Grievance Redress Mechanism (GRM)	38
6.2 Grievance Resolution Framework	39
6.3 DARES Grievance Escalation Process	40
6.4	42

6.5	World Bank Grievance Redress System	42
7.	Monitoring and Reporting	43
7.1.	Summary of how SEP implementation will be monitored and reported.	43
7.1.1	Reporting	43
7.1.2	Stakeholder Involvement in Project Monitoring.....	45
7.2.	Reporting back to stakeholder groups	45
Annexes.....		47

List Of Tables

Table 1: Indicative resource allocation.	7
Table 2: Description of intervention areas via the Solar Hybrid Mini-grid component for economic development.	9
Table 3: Vulnerable groups	13
Table 4:Stakeholder engagement during project preparation	14
Table 5: Engagement Techniques	16
Table 6: Methods/Tools for Information Provision, Feedback, Consultation and Participation	18
Table 7: Stakeholder Engagement and Disclosure Methods	27
Table 8: Organizational Roles and Responsibilities	29
Table 9: Key Performance Indicators by Project phase	34
Table 10: Outline of Reports to Stakeholders	36
Table 11: Template to Capture Consultation Minutes.	37

LIST OF ACRONYMS AND ABBREVIATIONS

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
FME _{env}	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

Executive Summary

ES1: Background

Recognizing the need to expand access to underserved populations, the Federal Government of Nigeria (FGN) approved the Rural Electrification Strategy and Implementation Plan (RESIP) and forward-looking Mini-Grid Regulations in 2016. The FGN established the Rural Electrification Agency (REA) through the Electric Power Sector Reform Act of 2005 with a mandate to increase rural access. REA became functional in 2006 as the sole authority managing the Rural Electrification Fund aiming to provide support for the development of on and off grid sectors in Nigeria.

The 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)

Nigeria Distributed Access To Renewable Energy Scale-Up Project (DARES) will Scale up successful elements of the NEP to include policy and partial financing support for productive uses to boost economic activity and improve human capital indicators while enhancing the financial viability and sustainability of ongoing electrification efforts. Inclusion of productive use as a focus area will create a win-win scenario for developers, rural entrepreneurs, and communities.

Nigeria DARES is the first joint WBG attempt to create a private sector led electrification ecosystem. The project will scale up successful elements of the NEP who has catalyzed the establishment of an off-grid and mini- grid industry in the country, with 52 off-grid solar companies and 61 mini- grid companies that have met rigorous qualification requirements to participate in the project.

The Project Development Objective (PDO) is to increase access to electricity services for households 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 (US\$1023 million, US\$ 410 million equivalent from IDA, and US\$ 613 million from private sector funding).

This component will support the development of privately owned and operated solar hybrid mini grids in unserved (primarily rural and remote) and underserved (primarily urban and peri-urban) areas with high economic growth potential. The mini grid component consists of two investment sub-components defined by their different subsidy approaches. It will be implemented in parallel: Sub-Component 1.1- the minimum subsidy tender and sub-component 1.2- performance-based grant program. These sub-components target different sets of private developers (although there may be some overlap), as summarized in Chapter one of the report.

Component 2. Stand-alone Solar Systems for Households, MSMEs, and Agribusinesses (IDA US\$715 million equivalent, of which US\$300 million IDA equivalent and US\$415 million from private sector funding). This component will expand the availability and affordability of standalone solar systems (SAS) for households (basic electrification), MSMEs, and agribusinesses (PUE support) in rural areas. Through targeted and competitively awarded performance-based and catalytic grants, the uptake of 2,750,000 quality-certified solar home systems (SHS) and 75,000 PUE products in rural areas and among lower-income segments will be promoted. This component has two subcomponents; under sub-component 2.1, the performance-based grants (PBG) will provide results-based payments per connection (verified product sale) while for sub-component 2.2., catalytic upfront grants will support companies seeking to distribute in hard-to-reach, underserved areas focusing on poor, remote, and hardest-to-reach consumers.

Component 3. Technical Assistance (US\$80 million, US\$40 million IDA equivalent and US\$40 million from other development partners). This component will be supported by financing and collaboration from various development partners, such as GEAPP, SEforALL, JICA, USAID, etc., to create an ecosystem for universal electrification.

For the effective implementation of the Nigeria DARES project there is a need for open and inclusive engagements with stakeholders, Project Affected Persons (PAPs), and other interested parties.

This SEP is designed to leverage on the NEP stakeholders' engagements on the parent project to fulfil the project's requirements as stated in ESS10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the DARES.

ES2- KEY NATIONAL LEGAL PROVISIONS FOR CITIZEN ENGAGEMENT

This section presents a brief overview of the national legal provisions that necessitates citizenship 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:

1. Implementing Agency (REA)
2. Private sector developers
3. Affected Parties

ES4: STAKEHOLDER ENGAGEMENT PLAN

The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and meaningful engagement with project- affected parties, the private sector developers and Implementing Partners throughout the project life cycle on issues that could potentially affect them during implementation of the various project activities, the IPF and the Technical Assistant component of the Project.

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.

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (EIA requirements, public hearing).

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 SEP will be implemented within the following timeframe:

- Placement of the SEP in the public domain – Dates to be confirmed by the implementing agency (REA)
- 21-days disclosure period – Dates to be confirmed by REA
- Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the Project – Dates to be confirmed by the REA.
- Addressing stakeholder feedback received on the entire disclosure package – Dates to be confirmed by REA.

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.

In case the internal capacity resources at the project appear to be insufficient, the project will also 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 local and national laws and the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. The overall objective of the GM is to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project.

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 deploy all 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 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.

ES7- MONITORING AND REPORTING

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. A series of key performance indicators for each stakeholder engagement stage have been developed in the SEP. Stakeholder involvement in monitoring of this Project will include

Involvement of affected stakeholders in all project stages, capacity building, and Grievance follow-up meetings with the affected stakeholders.

DARES will produce reports for use by project stakeholders at stipulated intervals and through specified mechanisms. Reports from various departments will be reviewed and appropriate information presented in synthesized reports to various stakeholders.

Conclusion

The DARES team have 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.

1. Introduction/Project Description

The 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 in order to kickstart private sector led off grid and mini grid sectors in Nigeria).

Nigeria announced its ambition to reach universal electricity access by 2030 as part of its Energy transition Plan (ETP). The ETP was approved by the Federal Executing Council (FEC) on February 2, 2022, following its unveiling by H.E. President Buhari during the United Nations (UN) Climate Change Conference in Glasgow (COP26). The ETP is a bold statement of ambition from the FGN to achieve universal electricity access by 2030 and a carbon-neutral energy system by 2060. The ETP estimates that the country would need about US\$410 billion over business-as-usual spending over the next 30 years to achieve universal access and carbon neutrality. Currently, the power sector is unprepared to meet this challenge from a planning, institutional, and funding perspective.

At the COP27 Climate Change Conference in Sharm el-Sheikh, Egypt, the WBG announced a new joint program—the WBG **Distributed Access through Renewable Energy Scale-Up Platform, or DARES Platform**—to triple the pace of electrification in Sub-Saharan Africa. DARES has five core areas: Mini-Grids, off-grid solar markets, systems for schools and health facilities, solar irrigation and cold chain for farmers, and innovative business models to displace diesel generation and improve access reliability.

Given the financing need of more than USD 25 billion for universal electrification in Nigeria, the scope of DARES will be to assist 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 proposed project supports key priorities of Nigeria's Intended Nationally Determined Contribution (INDC) to mitigate greenhouse gas (GHG) emissions. Nigeria intends to eliminate the use of kerosene lighting by 2030. By supporting electricity access expansion in rural and remote areas using renewable energy generation and improving urban grid reliability through distributed renewables, the proposed project intends to reduce the use through fossil-fuel based gensets for lighting and productive uses.

Nigeria DARES project will scale up successful elements of the NEP. NEP has catalyzed the establishment of an off-grid and mini grid industry in the country, with 52 off-grid solar companies and 61 mini grid companies that have met rigorous qualification requirements to participate in the program mini-grid.

DARES will include policy and partial financing support for productive uses to boost economic activity and improve human capital indicators while enhancing the financial viability and

sustainability of ongoing electrification efforts. Inclusion of productive use as a focus area will create a win-win scenario for developers, rural entrepreneurs, and communities. The nexus between electrification and income-generating activities provides an opportunity to enhance productivity in Nigeria while improving livelihoods in peri-urban and rural communities.

DARES also intends to support electricity transition in Nigeria through a massive genset replacement drive – powered by Urban electrification and densification. 85 percent of the urban population is connected to the grid, and yet they receive on average only 7 hours of electricity a day from it. Nigerian firms spend 3 to 4 times their grid tariff on diesel/gasoline gensets to meet their electricity demand negatively impacting their competitiveness. The current urban landscape can be divided into the following segments – residential communities, urban market centers mostly featuring micro, small, medium enterprises (MSMEs), commercial and industrial (C&I) installations and public institutions – all connected to the DisCo grid but remain “underserved”.¹ Typical consumer affordability and willingness to pay in urban areas is assumed to be higher than rural consumers on an aggregate basis. Both behind the meter (solar systems, rooftop solar), and grid-connected solutions (grid-connected rooftop solar, Interconnected Mini-Grids², DisCo franchise) remain available options. Each market segment has its own risk profile, and for the many business or delivery models, the key differences are who finances, builds, and operates them. The solutions can range from pure commercial to limited public finance support. DARES will focus on a “market creation” approach to identify and deploy commercially viable solutions that have the potential for rapid scale-up with limited public finance support to provide underserved consumers with reliable, cleaner, and affordable power compared to their current setup of an unreliable grid, combined with polluting and expensive gensets.

DARES will directly benefit Nigerian power sector customers including residential, commercial, and industrial customers and in particular women, with broader spill over benefits to other power sector participants and the broader Nigerian economy and environment. Reliable access to quality electricity supply will improve customer productivity and removes a major constraint to economic development.

The proposed DARES project supports the World Bank’s agenda of maximizing financing for development by attracting private financing to expand access. DARES is being developed as a platform that helps developers leverage catalytic public funding to raise private financing. The precursor to DARES was the NEP, which leveraged US\$ 1.25 of private capital for every US\$ 1 of public finance in mini grids.³ Table 1 illustrates how the DARES project will further scale this up.

¹ Nigerian regulations define an underserved area as: “an area that is already connected to the main grid through an existing main grid connected distribution company (DisCo) but the DisCo’s service is poor

² mini grid that is electrically connected to a DisCo’s existing grid. Electrically connected means that electrical energy can safely flow across the boundary between the two systems.

³ Based on a sample of commissioned projects. The REA is currently surveying developers of all completed projects to collect data on actual investments. The M&E system for the DARES project will be designed to collect such data by the time of project commissioning.

Table 1: Indicative resource allocation.

	Components/ Focus Areas	Public Finance Provided (FPF) USD	Private Capital Mobilized (PCM) and Grant Mobilized (GM) USD
1.	Solar Hybrid Mini-grids i.e., Isolated mini-grids, interconnected mini-grids, solar roof top and franchising/embedded generation	410 million	613 million
2.	Off grid Solar i.e., Solar Home Systems (SAS), Solar Productive Use (PUE) Equipment.	300 million	415 million
3.	Technical Assistance ⁴	40 million	40 million (grants)
	Total	750 million	1,068 million

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

Project Components

Component 1. Accelerating Mini grids (US\$1023 million, US\$ 410 million equivalent from IDA, and US\$ 613 million from private sector funding). This component will support the development of privately owned and operated solar hybrid mini grids in unserved (primarily rural and remote) and underserved (primarily urban and peri-urban) areas with high economic growth potential. The mini grid component consists of two investment sub-components defined by their different subsidy approaches. It will be implemented in parallel: Sub-Component 1.1- the minimum subsidy tender and sub-component 1.2- performance-based grant program. These sub-components target different sets of private developers (although there may be some overlap), as summarized in Table 2 below.

Table 2. Description of component 1

Component	Approach					Result Based Grant	
	Objective	Geographic	Site selection	Target Cluster Type	System Capacity	Determination	Type
1.1 Minimum Subsidy Tender							
MST for Isolated Mini Grids	Last-mile access	Rural, Remote	REA led (aggregated demand)	Residential and MSMEs	Up to 1MW	Competitive	Per connection
MST for Interconnected Mini Grids	Energy Transition Reliable supply	Urban, peri-Urban	DISCO led (aggregated demand)	Residential and economic clusters ⁵	Up to and above 1MW	Competitive	Percentage of CAPEX

⁴ Estimated Grant Mobilized (GM) for technical assistance assumes that DARES will synergize with other development partners by leveraging on-going or already planned TA for similar endeavor in the sector to avoid duplication of efforts.

⁵ Economic clusters are locations with high density of commercial and productive activities adding economic value which are also co-located. Examples are markets, plazas, cottage industries, commercial streets, agro-allied centers etc.

State Government Led Solar Rooftop Solution	Energy Transition Reliable supply	Urban, peri-Urban	State gov. led (aggregated demand)	Large general hospitals	Up to and above 1MW	Competitive	Percentage of CAPEX
1.2 Performance-Based Grants							
PBG for Isolated Mini Grids	Last-mile access	Rural, Remote	Developer led (site by site)	Residential and MSMEs	Up to 1MW	Pre-determined	Per connection
PBG for Interconnected Mini Grids	Energy Transition Reliable supply	Urban, peri-Urban	Developer led (site by site)	Residential and economic clusters	Up to 1MW	Pre-determined	Percentage of CAPEX

Sub-Component 1.1: Minimum Subsidy Tender for Mini Grids (IDA US\$215 million equivalent). The MST sub-component will aggregate demand and prepare portfolios of mini grid projects for tender. The mini grids will be privately financed, owned, and operated, and the tender will select the developer that needs the lowest subsidy to do so. Three separate MST pipelines will be used; one for isolated mini grids, one for interconnected mini grids, and one for solar rooftops in Lagos.

Component 1.2: Performance-Based Grants (PBG) Program (IDA US\$195 million equivalent). Under this sub-component, REA will provide administratively set PBGs to mini grid operators based on new customer connections (US\$/end users) for isolated mini grids and the percentage of CAPEX for interconnected (grid-connected) mini grid projects. Performance-based grants will be made available to mini grid developers on a rolling basis and differentiated based on geographic and socio-economic factors (determined by existing mini grid activity) and consumer classes (residential, PUE). Eligible projects must have minimum commercial or productive loads to ensure sustainability overall.

Component 2. Stand-alone Solar Systems for Households, MSMEs, and Agribusinesses (IDA US\$715 million equivalent, of which US\$300 million IDA equivalent and US\$415 million from private sector funding). This component as further described in table 3 will expand the availability and affordability of standalone solar systems (SAS) for households (basic electrification), MSMEs, and agribusinesses (PUE support) in rural areas. Through targeted and competitively awarded performance-based and catalytic grants, the uptake of 2,750,000 quality-certified solar home systems (SHS) and 75,000 PUE products in rural areas and among lower-income segments will be promoted. Under sub-component 2.1, the performance-based grants (PBG) will provide results-based payments per connection (verified product sale). Under sub-component 2.2., catalytic upfront grants will support companies seeking to distribute in hard-to-reach, underserved areas focusing on poor, remote, and hardest-to-reach consumers.

Table 3: Description of component 2

Component	Approach				Subsidy	
	Objective	Modality	Geographic	Target	Determination	Type

2.1 Performance Based Grants						
PBG for SHS	Last mile access	Private Sector led	Rural, remote	Households, MSMEs	Pre-determined	Per connection
PBG for PUE	Productive uses	Private sector led	Rural, remote	MSMEs, farmers, Agribusinesses,	Pre-determined	Per connection
2.2. Catalytic Grants						
Catalytic Grant	Last mile access in fragile, hard areas	Private sector led	Rural, remote	Households, MSMEs, agribusinesses	per business plan	Milestone based

Sub-Component 2.1 Performance Based Grants for Standalone Solar (SAS) (IDA US\$ 280 million equivalent). The sub-component will provide PBGs with the ability to rapidly deploy SAS solutions in rural and underserved areas. Supply and demand side support will be provided through the PBG to address the viability and affordability gap, respectively. Companies will receive a grant based on independently verified outputs with incentives varying by location and type of business model. The sub-component will help reduce the end-user prices for households identified as poor and vulnerable by the National and State Social Registry. This sub-component will also support deploying solar-powered PUE equipment to MSMEs, agribusinesses, and commercial customers.

Sub-Component 2.2: Catalytic Grants (IDA US\$ 20 million equivalent). This sub-component will incentivize companies targeting the poor, remote, or hardest-to-reach consumers in the country. Grants will be offered on a matching basis to ensure the company commits its funding and has ‘skin in the game’.

Component 3. Technical Assistance (US\$80 million, US\$40 million IDA equivalent and US\$40 million from other development partners). This component will be supported by financing and collaboration from various development partners, such as GEAPP, SEforALL, JICA, USAID, etc., to create an ecosystem for universal electrification.

Sub-Component 3.1: Institutional Strengthening (US\$ 10 million IDA equivalent) will support activities to build institutional capacity, including (i) strengthening of implementation capacities of REA and FMOP (ii) development of critical studies, including the national electrification plan.

Sub-Component 3.2: DARES Ecosystem and Implementation (US\$ 20 million IDA equivalent) will focus on (i) pipeline preparation for isolated and interconnected mini grids; (ii) building the PUE ecosystem, including geospatial mapping, demand stimulation and capacity building of financial institutions on market-based products and pricing, financial literacy; and (iii) managing E&S risks, including the development of citizen engagement framework.

Sub-Component 3.3: Engagement with States (US\$ 10 million IDA equivalent) will focus on (i) supporting states in crafting their role in the energy transition agenda during decentralization by providing TA for designing electricity markets, building capacity of state-

level sector institutions, developing regulatory and procurement capacity, and preparing policy framework and its implementation; (ii) determining viability for solar rooftop and setting up a one-stop-shop model for market creation – for interested and qualified states.

The project is located across the six (6) geo-political zones of Nigeria in all the thirty- six (36) states.

The DARES is being prepared under the World Bank’s Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agency should 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, or intimidation.

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 (such as mining operations, road development, coastal reclamation involving 50 or more hectares, etc.). 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 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 proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to 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, 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>

3. Stakeholder identification and analysis

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) inhibits 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.

- The projects' stakeholders also include parties other than the directly affected communities, including the local population who can benefit indirectly from interventions;
- Residents and business entities, and individual entrepreneurs in the community area of influence;
- Professional groups like the Manufactures Association of Nigeria-MAN;
- Local contractors and consultants who can support in the delivery of the Project;
- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in consumer's advocacy, Social Protection and livelihood support;
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labour authorities;
- DARES Project employees and contractors;
- Mass media and associated interest groups, including local, regional and national print and broadcasting media, digital/web-based entities, and their associations;
- Local Political groups;
- Academia; and
- Financial Institutions

3.3. 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 1 below.

Table 1: 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.

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted as shown in table 2.

Table 2: Summary of Stakeholder Engagement

S/N	Consultation	Meeting Dates	Participants	Meeting themes	Venue
1	Discussions with previously identified stakeholders to firm up the design of various interventions meant to scale up and improve up successful elements of the ongoing Nigeria Electrification Project (NEP)	2 nd December 2022	Private sector developers, REA-NEP, World Bank	Engagement with stakeholders as a way of building on lessons learned from the NEP for the DARES project.	Virtual (zoom meeting)
2	Meeting with SHS distributors/companies around the deployment of the standalone home systems.	30 th November 2022	REA Management, NEP PMU, Developers, IDAs	Engagement with stakeholders as a way of building on lessons learned from the NEP for the DARES project.	Hybrid (Physical & Virtual)
3	Brainstorming session with the NEP Solar Hybrid Mini Grid Team	29 th November 2022	REA Management, NEP PMU, World Bank	Refining the scope of the Mini grid component under the NEP to improve on the scope for the planned DARES project.	Physical meeting at the REA-NEP office, Jabi Abuja
4	Deep dive discussion	17 th and 22 nd March 2023	REA management, NEP PMU, World Bank	Deep dive into the concept notes for the DARES project	Hybrid (Physical & Virtual) at the NEP Office, Abuja
5	Engagement with the development partners and other stakeholders.	16 th 2023 March	RMI, REA-NEP, GEAPP and SE4All	Building a coalition of support for DARES to seek parallel financing opportunities across the planned interventions and Technical Assistance.	Physical meeting at the NEP Office, Abuja
6	Kickoff workshop for the Pre-Appraisal mission.	15 th March, 2023	REA-NEP PMU, World Bank	Defining the scope of the planned DARES project interventions in Rural Peri-Urban and Urban areas and including productive uses of electricity.	Physical meeting at the NEP Office, Abuja

The environmental and social reports and plans are not disclosed at this time. Feedback received during consultations raised by stakeholders has been taken into account. A summary of the main recommendations received is being integrated into the Stakeholder Engagement Plan as appropriate.

4.2. 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. Table 3 describes the appropriateness of each engagement technique.

A summary description of the engagement methods and techniques that will be applied by the Nigeria DARES Program is provided in table 3 below while table 4 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. A sample Stakeholder Engagement Plan is described in Table 5.

Table 3: Engagement Techniques

TECHNIQUE	MOST APPROPRIATE APPLICATION OF TECHNIQUE
Information Centre and Information Boards	<ul style="list-style-type: none"> • Establish Information Boards in each Project area community.
Correspondence by phone/email/Text/Instant messaging	<ul style="list-style-type: none"> • Distribute project information to government officials, organizations, agencies and companies. • Invite stakeholders to meetings
Print media and radio announcements	<ul style="list-style-type: none"> • Disseminate project information to large audiences, and illiterate stakeholders. • Inform stakeholders about consultation meetings
One-on-one interviews	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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

TECHNIQUE	MOST APPROPRIATE APPLICATION OF TECHNIQUE
Public meetings	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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, analyse information, and develop recommendations and strategies. • Recording of responses
Focus group meetings	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Gather opinions and views from individual stakeholders. • Gather baseline data. • Record data • Develop a baseline database for monitoring impacts

Table 4: 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	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 fill in a return to the Project’s specified address.	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
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.	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

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
		General description of the Project and its benefits to the stakeholders.			
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 by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience is also given free access to a register of comments and suggestions.	All projected affected parties	Weekly update
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.	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,	Any project stakeholder and interested parties.	Available all through the project cycle

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	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.		and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.		
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, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	All project affected parties.	
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	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.	

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	and response/action, as necessary.				
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 Implementing Agencies and Partners Relevant Government Ministries and Agencies	On a need basis
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

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
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	

Table 5: Stakeholder Engagement Plan (SEP)

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Design	<i>Before commencing key project and ongoing</i>	Need for the project; Ongoing and planned activities; Presentation of the project ESMF, RPF, SEP. GRM 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	<i>October 2023 - Along the project implementation period through monthly community works on construction sites</i>	<i>Need for the project, Ongoing activities, and sensitization on GM</i>	Meetings, Presentations, Information boards, during disclose of relevant instruments; ESIA, ESMP	General Public: project beneficiaries, PAPs, Contractors. Government officials and government Institutions:	Environmental and Social Safeguard Specialists and Officers Project site engineer
Operation	<i>On sites</i>	<i>Use of the facilities, OHS, and Maintenance.</i>	Public meetings Site visits.	Beneficiary communities, Contractors	Environmental and Social Safeguard Specialists and Officers
Decommissioning	<i>After design life span</i>	EHS	Meetings	Beneficiary Communities, Local government,	Environmental and Social safeguard Specialists and Officers, Project Coordinator, Project Engineers

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (EIA requirements, public hearing). While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner.

This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information, but it also allows for more constructive participation in the other processes of consultation and resolution of grievances due to the availability of accurate and timely information. This will also ensure accountability and ownership of the project. 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:

- Office of the Chief of Staff
- Office of the Vice President
- 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 6 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 6: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Project Affected Parties	<ul style="list-style-type: none"> • Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development. 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Stakeholder Engagement Plan • Public Grievance Procedure • Regular updates on Project development. 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Stakeholder Engagement Plan • PIP update • Regular updates on Project development • Additional types of Project information if required for the purposes of regulation and permitting. 	<ul style="list-style-type: none"> • Dissemination of hard copies of the SEP
Implementing Agency	<ul style="list-style-type: none"> • Stakeholder Engagement Plan • PIP updates • Regular updates on Project development • Additional types of Project information if required for the purposes of implementation and timeline. 	<ul style="list-style-type: none"> • Public Notices • Consultation Meetings • Information leaflets and brochures. • Electronic publications and press releases on the project website.
Related businesses and enterprises	<p>Stakeholder Engagement Plan.</p> <p>Public Grievance Procedure.</p> <p>Updates on Project development and tender/procurement announcements.</p>	<ul style="list-style-type: none"> • Electronic publications and press releases on the Project website. • Information leaflets and brochures. • Procurement notifications.

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Project Employees	Employee Grievance Procedure. Updates on Project development.	<ul style="list-style-type: none"> • Staff handbook. • Email updates covering the Project staff and personnel. • Regular meetings with the staff. • Posts on information boards in the offices and on site. • Reports, leaflets.

4.4. 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.

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.

The roles and responsibilities of the organizations are presented below in Table 7 The Project Implementation Unit (PMU) DARES Project

Table 7: Organizational Roles and Responsibilities

Role	Responsibility / Accountability
<p>National Project Coordinator at the PMU and a dedicated team comprising of:</p> <p>Research and Development, Project Manager, Procurement Officer, Social Development Officer, and an Environmental Officer</p>	<ul style="list-style-type: none"> • 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.
<p>National Project Coordinator & Procurement Specialist. Social Specialist</p>	<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • Environmental and Occupational Health and 	<p><u>Social Development Specialist:</u></p> <p>As the primary interface between the Project and stakeholders, including the local community, the Social Specialist will:</p> <p>Develop, implement, and monitor all stakeholder engagement strategies/plans for the Project.</p>

Role	Responsibility / Accountability
Safety Specialist • Social Specialist	<ul style="list-style-type: none"> • Interact with related and complementary support activities that require <i>ad hoc</i> 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. <p><u>Environmental Occupational Health and Safety Specialist:</u></p> <ul style="list-style-type: none"> • Review the SEP ensuring compliance in terms of environmental, and H&S requirements and provide feedback to the social specialist.
Seconded staff, IVA consultants, and other relevant agencies	<ul style="list-style-type: none"> • 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.

The budget for the SEP is **USD 940,000** and is included in the Technical Assistance component of the project.

Table 8: Proposed Budget Line Items for Stakeholder Engagement

S/No.	Item	Frequency	Proposed Budget USD
1.	Stakeholder Engagement in project locations		150,000
2	Virtual online meetings/ internet with project stakeholders and state counterparts		5,000
3.	Town-hall meetings in Locations where DARES platform Project exist		70,000
4.	2-Day Primary Stakeholders retreat		50,000
5,	Subsidiary staffing of the Environmental and Social unit (Salary)		50,000
6.	Stakeholder consultative Forum		50,000
7	Production of National Jingles for Television and Radio		100,000
8	Production of Newsletter		E-newsletter is advised
	Project information kit		30,000
10	Monthly Sponsored radio Programme		200,000
11	Purchase of audio visual and Public Address systems		60,000
12	Purchase of cameras		20,000
13	Purchase of publicity vans Registration & Insurance		120,000
14	Maintenance of Vehicles & Fuelling		10,000
15.	Miscellaneous (Printing etc.)		5,000
16	Toll free number		15,000
17	Purchase of face mask, hand sanitizer / sanitation facilities and temperature testing equipment's.		5,000
	Total		940,000

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.

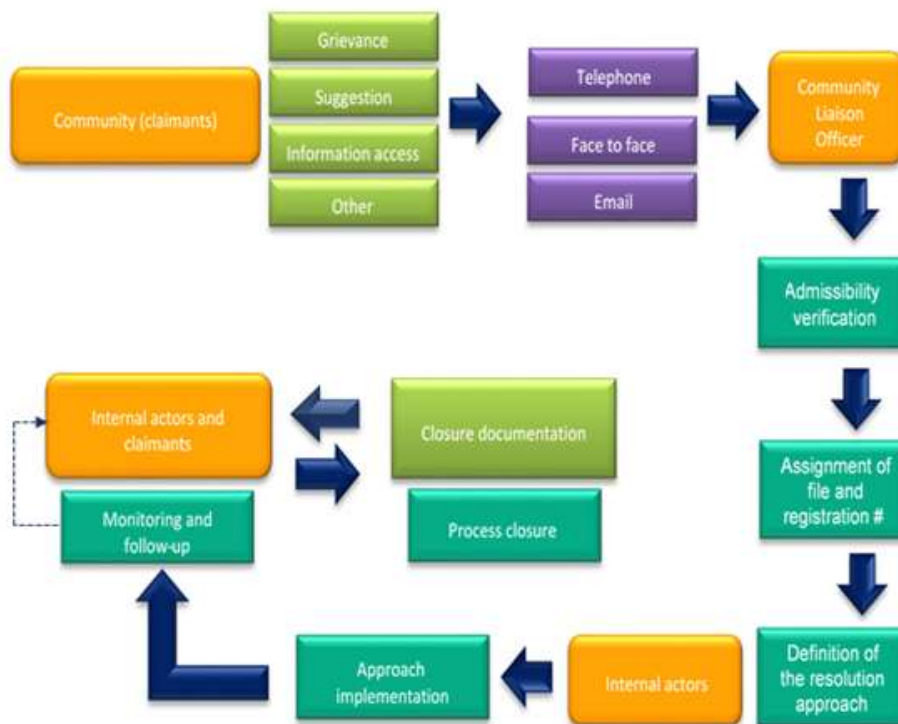
6. Grievance Mechanism

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.

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 GRM 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



6.1. 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 9: Grievance Management Process

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

Grievance Redress Mechanism (GRM)

Project-affected people and any other stakeholders may submit comments or complaints at any time by using the project’s Grievance Redress Mechanism (GRM). The overall objectives of the GRM 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 GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the program as it affects them. The GRM 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.

6.2 Grievance Resolution Framework

Information about the GRM 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 GRM 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 a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve, and respond to grievances raised.
- ***Step 3: Acknowledgement and follow-up.*** Within seven (7) 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.

6.3 DARES Grievance Escalation Process

The GRM 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
- E-mail
- 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

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

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 GRC secretary, the GRM coordinator at the PMU (and any female GRC 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 GRM 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 GRC.

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 GRM 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 GRM operator about the survivor's age, sex, and the fact that he or she does not choose to proceed with accountability processes.

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.

6.4

handling, the –REA/PMU will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

6.5 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 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.

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA
- 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.

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 could occur, as a result of the World Bank’s non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank’s attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

7. Monitoring and Reporting

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.

7.1.1 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 10 shows the indicators, and performance against the indicators to show successful completion of engagement tasks.

Table 10: Key Performance Indicators by Project Phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for DARES	<ul style="list-style-type: none">▪ Preliminary Stakeholder engagement on project designs and anticipated impacts.▪ Notification on multi-media (posters, radio,	<ul style="list-style-type: none">▪ Stakeholder engagement reports & records of meetings▪ Number of public hearings, consultation meetings, and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually).▪ Frequency of public engagement activities.▪ Number of notifications & mode of communication▪ Number of letters/emails sent

Project Phase	Key activities	Indicator
	TV, DARES website ▪ Official correspondence	
Project Implementation	▪ Project Notices issued. ▪ Stakeholders Mapping	▪ Newspaper clippings, updates on the DARES website ▪ Geographical coverage of public engagement activities – number of locations and communities covered by the consultation process; ▪ Number and details of vulnerable individuals involved in consultation meetings; ▪ Number of updated versions - at least one updated version within the project cycle
	• Recorded Grievances in the GRM	▪ Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; ▪ Type of public grievances received; ▪ All grievances addressed as per grievance procedure ▪ Pending grievances & suggested resolutions
	▪ SEP Implementation ▪ Public gatherings	▪ SEP Annual reports ▪ Number of public gatherings & records (topics discussed) ▪ Number of press materials published/broadcasted in the local, regional, and national media;
	▪ Official correspondence ▪ Information Disclosure and External ▪ Communication	▪ Number of letters/emails sent. ▪ % of received communications being answered through the website ▪ % of received communications being answered through the email ▪ % of answered calls through the telephone exchange.
Project Completion	SEP implementation Project	▪ SEP Final Report

7.1.2 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.
- Observations of monitoring and audit activities by affected parties.
- Grievance follow-up meetings and calls with affected stakeholders.

7.2. 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 11: 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	<ul style="list-style-type: none"> • Project development activities, • Challenges and opportunities, • local workers hiring status 	<ul style="list-style-type: none"> • REA • World Bank 	Quarterly, six months after the effectiveness date and other agreed timeline

Report	Content	Stakeholder	Frequency
Media release	Main Project milestones	Local media (and national media as appropriate)	At agreed timeline

Annexes

Template to Capture Consultation Minutes

Complete the table below.

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
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