



Stakeholder Engagement Plan (SEP)

REGIONAL PROGRAM FOR DISTRIBUTED ACCESS THROUGH RENEWABLE ENERGY SOLUTIONS - LIBERIA (P507938)

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Glossary

AfDB — African Development Bank
AML/CFT — Anti-Money Laundering / Countering the Financing of Terrorism
AMI — Advanced Metering Infrastructure (compteurs intelligents et systèmes associés)
AU — African Union
CBO — Community-Based Organization
CLO — Community Liaison Officer
CSO — Civil Society Organization
DARES — Distributed Access through Renewable Energy Solutions
D-MRV — Data, Monitoring, Reporting and Verification
DRE — Distributed Renewable Energy
ECOWAS — Economic Community of West African States
ECREEE — ECOWAS Centre for Renewable Energy and Energy Efficiency
EPA — Environmental Protection Agency (Liberia)
ESCP — Environmental and Social Commitment Plan
ESF — Environmental and Social Framework
ESIA — Environmental and Social Impact Assessment
ESIRT — Environmental and Social Incident Response Toolkit
ESMP — Environmental and Social Management Plan
ESS — Environmental and Social Standard
FGD — Focus Group Discussion
FIA — Financial Intelligence Agency (Liberia)
FM — Financial Management
GDPR — General Data Protection Regulation (EU)
GHG — Greenhouse Gas
GM — Grievance Mechanism
GMIS — Grievance Mechanism Information System
GRS — Grievance Redress Service (World Bank)
IVA — Independent Verification Agent
KPI — Key Performance Indicator
LACC — Liberia Anti-Corruption Commission
LEAP—Liberian Energy Access Practitioner
LEC—Liberia Electricity Corporation
LERC — Liberia Electricity Regulatory Commission
LMP — Labor Management Procedures
M&E — Monitoring and Evaluation
MME — Ministry of Mines and Energy (Liberia)
MFDP — Ministry of Finance & Development Planning (Liberia)
MoH — Ministry of Health (Liberia)
MSME — Micro, Small and Medium Enterprises
NDC — Nationally Determined Contribution
NGO — Non-Governmental Organization
OIP — Other Interested Party
PAP — Project-Affected People

PDO — Project Development Objective

PIU — Project Implementation Unit

RCU — Regional Coordination Unit

RREA — Rural and Renewable Energy Agency (Liberia)

SEA/SH — Sexual Exploitation and Abuse / Sexual Harassment

SEP — Stakeholder Engagement Plan

SHS — Solar Home System

TA — Technical Assistance

ToR — Terms of Reference

WB — World Bank

Executive Summary

The Stakeholder Engagement Plan (SEP) has been prepared for the Liberia pillar of the Distributed Access through Renewable Energy Scale-Up (DARES) Project, financed by the World Bank. The overall objective of the project is to increase access to affordable and clean energy through distributed renewable energy (DRE) solutions, particularly in rural and peri-urban areas. At this stage, the Liberia-specific activities, target locations, and detailed implementation arrangements remain subject to final appraisal, design confirmation, and subsequent subproject selection in accordance with the applicable project instruments and procedures.

In Liberia, the Project will be implemented by the Rural and Renewable Energy Agency (RREA) under the oversight of the Ministry of Mines and Energy (MME). The national Project Implementation Unit (PIU), hosted by RREA, will be responsible for day-to-day coordination, environmental and social (E&S) risk management, and stakeholder engagement.

Purpose of the SEP

This SEP has been developed in accordance with the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. It serves as a framework/project-level instrument, while subproject-level stakeholder engagement will be undertaken during implementation once specific sites, investments, and beneficiary communities have been identified.

The SEP describes the strategies and actions to engage with stakeholders throughout the project lifecycle. It aims to ensure that all affected and interested parties are informed, consulted, and able to participate meaningfully in project design and implementation. The SEP also establishes a structured mechanism for receiving and addressing grievances. The stakeholder engagement approach will be updated and adapted as project design advances, subprojects are identified, and stakeholder mapping is refined during project implementation. The project will conduct consultations and redisclose the SEP within two months following the project's effective date.

Stakeholders

Stakeholders identified under the Project include:

- Project-affected parties (PAPs): households, small businesses, and communities benefiting from or affected by electrification activities, including those near DRE installation sites. or otherwise exposed to potential economic, environmental, or social impacts.
- Other interested parties (OIPs): national and local government institutions, private sector actors, civil society organizations, and development partners.
- Vulnerable groups: women, persons with disabilities, youth, and low-income or remote populations requiring targeted engagement measures.

Stakeholder mapping has been completed at framework level to guide continuous engagement and ensure inclusiveness. This mapping will be updated at regional, district, and subproject levels during implementation as specific sites and affected communities are identified. The project will conduct consultations and redisclose SEP within two months following the project effective date.

Engagement Process

Stakeholder engagement will rely on participatory and inclusive approaches adapted to local contexts. Engagement methods include community meetings, focus group discussions, radio programs, and the dissemination of information through the RREA website and local notice boards. These methods will be adapted, as needed, to local languages, literacy levels, and rural community structures in Liberia, with tailored approaches to support the effective inclusion of vulnerable and disadvantaged groups.

Community Liaison Officers (CLOs) will facilitate ongoing communication and feedback between communities and the PIU.

All consultation activities will be documented and monitored through digital tools such as KoboToolbox and integrated into project monitoring systems. Consultation records will, as appropriate, include attendance, sex-disaggregated participation data, issues raised, responses provided, and follow-up actions, in line with ESS10 good practice.

Grievance Mechanism

A Grievance Mechanism (GM) has been established to ensure that concerns and complaints related to the project are received, recorded, and addressed promptly, fairly, and transparently.

Grievances can be submitted through multiple channels, including CLOs, community committees, the PIU, or direct contact points (phone, email, or suggestion boxes).

All cases will be registered in the Grievance Mechanism Information System (GMIS) managed by the PIU.

The GM includes specific confidential procedures for handling SEA/SH (Sexual Exploitation and Abuse/Sexual Harassment) and financial integrity (AML/CFT) cases, which will be referred to the appropriate entities. SEA/SH cases will follow a survivor-centered and confidential referral pathway, while worker grievances and integrity-related complaints will be handled through their respective procedures, distinct from the standard community grievance process. Unresolved cases may be escalated to the Regional Coordination Unit (RCU) or to the World Bank's Grievance Redress Service (GRS).

Institutional Arrangements

Stakeholder engagement and GM implementation involve both regional and national levels:

- Regional Level: the Regional Coordination Unit (RCU) ensures consistency and reporting across participating countries; the Fund Manager evaluates DRE company applications and monitors performance; the Third parties monitoring (TPM) conducts compliance verification; and the Found manager provides financial oversight and investigates AML/CFT-related grievances referred by the PIU.
- National Level (Liberia): the PIU (RREA) leads stakeholder engagement, coordinates with national institutions, manages the GM, and ensures monitoring and reporting. CLOs act as local entry points for grievance submission and community outreach. DRE operators/service providers will also have defined subproject-level stakeholder engagement responsibilities, to be implemented under the oversight of the PIU.

Resources and Budget

An estimated USD 1,491,500 has been allocated for the implementation of SEP in Liberia.

The budget covers staff, consultations, communication materials, training, operation of the grievance mechanism, monitoring, and disclosure activities.

The budget will be refined and updated annually as part of the PIU's work plan.

Monitoring and Reporting

The PIU will monitor and report on SEP implementation through quarterly and annual progress reports. These reports will include the number of consultations conducted, issues raised, grievances received and resolved, and lessons learned. Where feasible, monitoring data will be disaggregated by sex and the participation of vulnerable groups, and will track not only completed activities but also the effectiveness and inclusiveness of stakeholder engagement.

Aggregated information will be shared publicly through community meetings, local radio, and the RREA website. The SEP will be reviewed annually and updated as needed.

Conclusion

The SEP establishes a framework for inclusive and transparent engagement between the Project and its stakeholders. Through proactive communication, grievance management, and continuous feedback, the Project seeks to build trust, promote accountability, and ensure that communities benefit equitably from renewable energy development in Liberia. This framework will be further operationalized through phased regional, district, and subproject-level engagement as investment areas and subprojects are confirmed during implementation.

1. Introduction/Project Description

The Regional Distributed Access through Renewable Energy Solutions (DARES) Project is a World Bank–financed program designed to expand electricity access in fragile and low-access countries in Sub-Saharan Africa. The program covers Liberia, Sierra Leon, Central African Republic, Chad, Guinea and Benin. The Liberia DARES Project builds on the regional program and reflects the country’s specific challenges of low electricity access, institutional fragility, and reliance on private sector–led distributed renewable energy solutions. The Project Development Objective is to increase electricity access for households, businesses, and public institutions through private sector–led Distributed Renewable Energy (DRE) solutions, including solar mini-grids, standalone solar home systems, and productive-use equipment.

The DARES Program is structured around four pillars. In Liberia, the project will support decentralized renewable energy market development to accelerate electricity access in rural and peri-urban areas. The indicative activities to be financed will be aligned with the following pillars:

- **Pillar 1: Connecting People** – Supports expanded access to electricity for households and micro and small enterprises, particularly in rural and peri-urban areas, through privately delivered decentralized renewable energy solutions, including solar mini-grids and standalone solar systems.
- **Pillar 2: Powering Economic Transformation** – Promotes the productive use of electricity by supporting energy-enabled agricultural technologies and rural economic activities, such as solar irrigation, agro-processing, cold storage, and other income-generating uses, with a focus on strengthening local value chains and climate resilience.
- **Pillar 3: Energy as a Service (EaaS)** – Provides clean, reliable, and sustainable electricity services to public institutions, such as schools and health facilities, through long-term, performance-based energy service contracts implemented by private operators, ensuring service quality, maintenance, and continuity.
- **Pillar 4: Implementation Support, Technical Assistance, and Capacity Building** Strengthens the enabling environment for decentralized renewable energy scale-up through institutional capacity building, regulatory and technical support, environmental and social management systems, and regional coordination.

The specific scope and budget for Liberia will be confirmed during project appraisal and detailed in the Project Appraisal Document (PAD) and Financing Agreement.

In Liberia, DARES will prioritize rural and remote communities with low electricity access. Implementation will rely on private Distributed Renewable Energy (DRE) companies to deliver off-grid services through a results-based financing mechanism managed by a Fund Manager, while institutional coordination and oversight will be ensured by the National PIU and relevant government agencies.

The National Project Implementation Unit (PIU) will be hosted by the Liberia Rural and Renewable Energy Agency (RREA) and will coordinate implementation of activities under Pillars 1 and 3. Pillar 2 will focus on productive-use market development targeting farmers and agribusinesses. Pillar 4 will provide regulatory and institutional support to national entities, including the Liberia Electricity Regulatory Commission (LERC), the Rural and Renewable Energy Agency (RREA), the Ministry of Mines and Energy (MME), the Environmental Protection Agency (EPA), and other relevant institutions involved in energy sector governance and oversight.

Interventions will prioritize rural and peri-urban areas with limited grid coverage. Planned activities include deployment of solar mini-grids and standalone systems; support for productive technologies (irrigation, cooling, agro-processing, storage); electrification of public institutions (schools, health centers, water facilities); and capacity building for national institutions.

1.1. Institutional Arrangements

The project has a **multi-layered institutional structure** designed to ensure strong governance, financial transparency, and robust environmental and social (E&S) risk management. Detailed roles are provided in Section 5.

This SEP has been prepared in line with the World Bank's ESS10 and includes a project-level Grievance Mechanism.

1.2. Integration of E&S Aspects into the DARES Regional Program

The **DARES regional program** integrates environmental and social (E&S) aspects in a cross-cutting manner throughout its institutional, operational, and financial frameworks, in accordance with the requirements of the World Bank's **Environmental and Social Framework (ESF)**. This integration aims to anticipate, prevent, and manage potential environmental and social risks and impacts associated with investments, while maximizing benefits for affected communities and relevant stakeholders.

The adopted approach is based on close articulation between the Program's framework instruments, regional and national governance mechanisms, and operational procedures applied at the project level. It ensures that E&S requirements are taken into account from the early stages of planning and financing and are subsequently translated into operational measures throughout the full investment cycle, including project preparation, implementation, and monitoring.

The diagram below provides a synthetic overview of the architecture for integrating E&S aspects within the DARES regional program, illustrating the interactions between financial flows, technical processes, and environmental and social management, supervision, and control mechanisms.

1.2.1. Presentation of the Diagram

The diagram below illustrates the institutional and operational architecture of the DARES regional program, as well as the cross-cutting integration of environmental and social

(E&S) aspects throughout the investment preparation, financing, implementation, and monitoring cycle. It highlights the interactions between regional, national, and private actors, as well as the functional linkages between financial flows, technical processes, and E&S management and supervision mechanisms, in line with the requirements of the World Bank's Environmental and Social Framework (ESF).

This flowchart makes it possible to visualize how E&S requirements are integrated from the early stages of the Program, starting with financing agreements and framework instruments (**ESCP, ESMF, SEP**, and subsequently operationalized at the sub-project level. This includes investment identification, permitting processes, implementation activities, as well as verification, reporting, and independent control mechanisms.

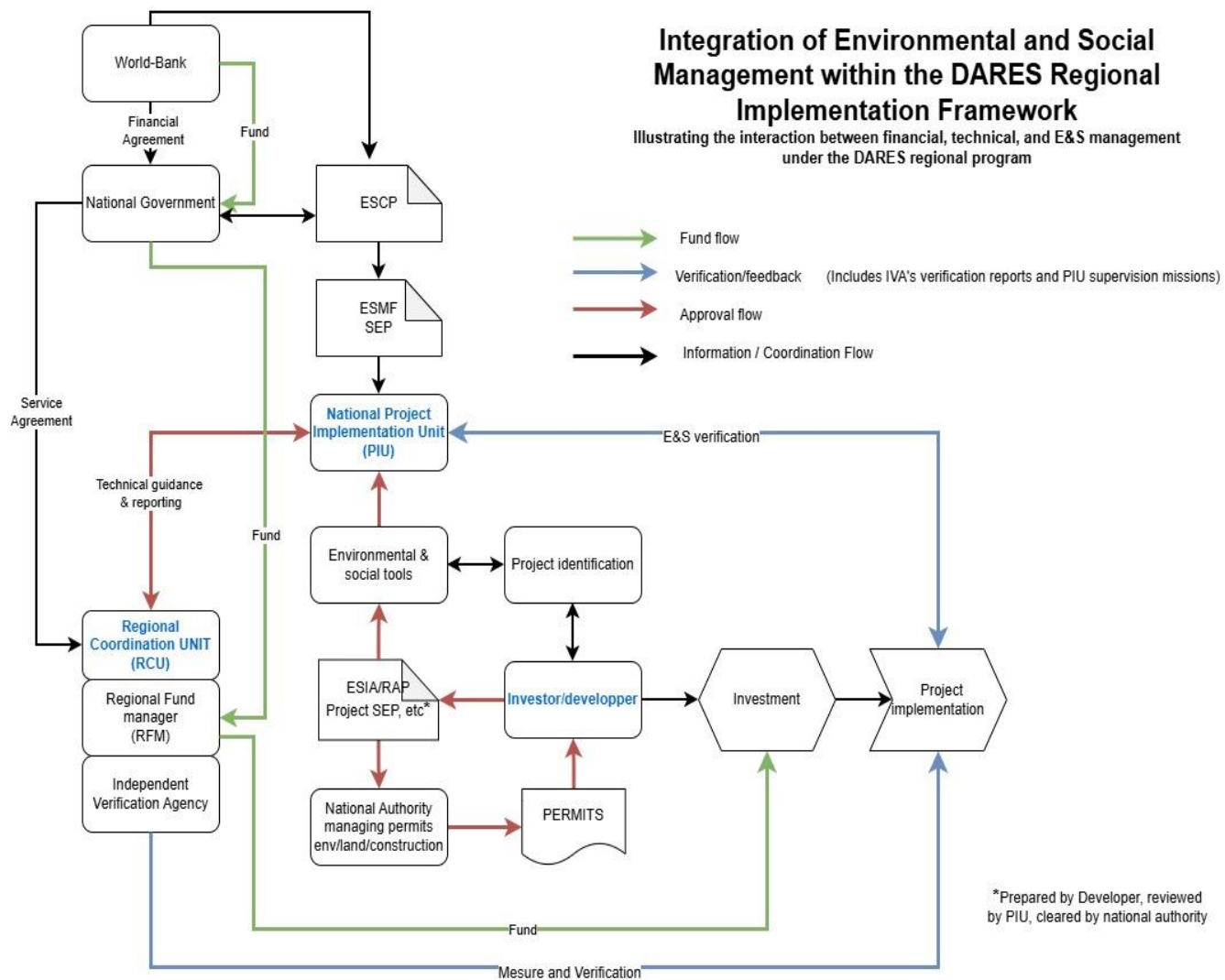
1.2.2. Explanation of the Flowchart – Operating Logic and Flows

The flowchart presents, on the one hand, the financial flows linking the World Bank, beneficiary governments, the Regional Coordination Unit (RCU), and the Project Implementation Units (PIUs), and, on the other hand, the information, coordination, and approval pathways associated with the Program's environmental and social management. The E&S framework instruments (ESCP, ESMF, and SEP) constitute the normative foundation of the Program and guide all project preparation and implementation activities.

At the operational level, the PIU plays a central role in coordinating technical, financial, and E&S aspects, in close collaboration with the RCU, investors/developers, and the competent national authorities. Identified projects undergo specific E&S preparation (ESIA, RAP, project-specific SEP, etc.), which is carried out by developers, reviewed by the PIU, and submitted to national authorization and permitting procedures. Investment implementation is supported by monitoring, verification, and supervision mechanisms, including independent control and reporting functions, to ensure continuous compliance with national requirements and World Bank standards throughout the project cycle.

The diagram should be read from top to bottom, distinguishing between financial flows, approval pathways, and E&S supervision mechanisms.

Figure 1 :Diagram illustrating the integration of environmental and social aspects into the DARES Program



Key Messages of the Diagram

- Environmental and social requirements are integrated from the early stages of the DARES Program through the framework instruments (**ESCP, ESMF, SEP** and are operationalized at the project level.
- The Program's institutional architecture is based on a clear allocation of roles among regional, national, and private actors, with the **PIU** serving as the central coordination and supervision hub.
- Control mechanisms, independent verification, and reporting ensure continuous compliance of investments with national requirements and World Bank standards throughout the project cycle.

2. Objective/Description of SEP

The Stakeholder Engagement Plan (SEP) is a key instrument of the DARES Liberia Project. It provides a framework for **systematic, inclusive, and transparent engagement** with all stakeholders throughout the project life cycle.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the project cycle. The SEP outlines how the National PIU (hosted by RREA) will communicate and engage with stakeholders and provides a mechanism by which people can raise concerns, provide feedback, or make complaints about the project. The SEP emphasizes methods to engage vulnerable groups and those at risk of exclusion.

At the project preparation stage, stakeholder engagement has been limited to national and sector-level stakeholders, including government authorities, private sector actors, and existing project implementation structures. Community-level consultations will be conducted during project implementation, once specific subprojects, locations, and affected communities have been identified.

Grant recipient DRE companies will be responsible for conducting stakeholder engagement activities at the local level for each subproject, in line with the guidance, tools, and minimum requirements established by the National PIU under this SEP.

2.1. Purpose of the SEP

The SEP ensures that all stakeholders—particularly affected peoples/communities and vulnerable groups—are provided with **timely and relevant information**, that their concerns are heard, and that their feedback is integrated into project design, implementation, and monitoring. It also supports accountability by setting out clear mechanisms for consultation, disclosure, and grievance management.

In the context of DARES Liberia, the SEP is essential because:

- The project will operate in **rural and peri-urban areas** with low electricity access and limited institutional presence.
- The interventions involve **private sector operators** whose accountability to communities must be reinforced through transparent engagement.
- The project context includes risks of **elite capture, corruption, and potential misuse of funds**, requiring safeguards and a strong fiduciary framework.
- The World Bank's Environmental and Social Standard 10 (ESS10) requires Borrowers to engage with stakeholders as an integral part of environmental and social risk management.

The SEP will be implemented throughout the project lifecycle and updated as needed during implementation to reflect operational realities and stakeholder feedback.

2.2. Objectives of the SEP

The SEP has multiple objectives. It is not only a communication tool but also a governance instrument that strengthens accountability and inclusion in project delivery. It ensures that all stakeholders, especially vulnerable groups, can participate and influence decisions. The following objectives will guide stakeholder engagement under the Liberia DARES Project.

- Define the approach and principles for stakeholder engagement in line with applicable requirements.
- Identify and analyze stakeholders, including their interests, influence, needs, and vulnerabilities.
- Define strategies and methods for meaningful consultation and information disclosure, including communication channels and feedback loops.
- Establish the SEP implementation arrangements, including roles, responsibilities, and resources.
- Establish the Project grievance mechanism to receive, address, and track feedback and complaints.
- Define monitoring, reporting, and update procedures for the SEP, including revision triggers and documentation of changes.

2.3. Link to Environmental and Social Risk Management

The SEP is directly linked to the Project's Environmental and Social instruments (e.g., ESIA, ESMP, LMP, SEA/SH Action Plan) which are prepared under the responsibility of the Borrower through the PIU, with support from the RCU where applicable, and with site-specific instruments prepared by developers/operators under PIU oversight. . It ensures that prevention, mitigation measures, and commitments outlined in these instruments are effectively communicated to stakeholders and that their implementation is subject to continuous community oversight and monitoring.

In addition to its integration with Project-specific environmental and social instruments, the SEP is also grounded in the national legal and institutional framework governing stakeholder engagement and information disclosure in Liberia. The following section summarizes the key statutory and institutional requirements that inform and shape the design of the Project's stakeholder engagement approach.

2.4. National Requirements for Stakeholder Engagement

Stakeholder engagement in Liberia is governed by a combination of statutory requirements, regulatory instruments, and institutional mandates that establish obligations for consultation, disclosure, transparency, and public participation in development projects. These national provisions constitute the legal baseline for stakeholder engagement under the Project.

Key elements of the national framework include environmental legislation requiring public participation in environmental assessment processes, as well as transparency and access-to-information laws that promote accountability and citizen access to public information. Together, these instruments require that affected communities and relevant

stakeholders be informed of proposed activities, consulted during project preparation and implementation, and provided with access to relevant documentation in a timely and accessible manner.

For the purposes of the Project, these national requirements are complemented and strengthened by the World Bank's Environmental and Social Framework (ESF), Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. ESS10 establishes a systematic and life-cycle approach to stakeholder engagement, emphasizing early engagement, inclusive participation, meaningful consultation, accessible grievance mechanisms, and ongoing information disclosure.

Accordingly, the Project's Stakeholder Engagement Plan (SEP) has been designed to align with both national legal requirements and ESS10, ensuring that stakeholder engagement processes meet domestic statutory obligations while applying international good practice standards.

2.4.1. Environmental Protection and Management Law (EPML, 2003)

The EPML provides the overarching framework for environmental governance in Liberia. It requires that all projects with potential environmental and social risks conduct an **Environmental and social Impact Assessment (ESIA)**. A central requirement of the EIA process is **public participation**, which includes:

- Notification of affected communities and stakeholders about the project.
- Disclosure of draft EIA documents in accessible formats and languages.
- Public hearings convened by the Environmental Protection Agency (EPA) for projects with significant impacts.
- Integration of stakeholder feedback into the final EIA and associated Environmental and Social Management Plans (ESMPs).

2.4.2. Role of the Environmental Protection Agency (EPA)

The EPA is mandated to regulate the EIA process and to ensure compliance with public participation obligations. Developers and project entities must:

- Submit Terms of Reference (ToRs) for EIA studies to the EPA for review and approval.
- Conduct consultations during the scoping, draft, and final phases of the EIA.
- Provide evidence of stakeholder engagement as part of the EIA submission package.
- Document how stakeholder comments and concerns have been addressed.

2.4.3. Freedom of Information Act (2010)

The Freedom of Information Act (FOI Act), enacted in 2010, guarantees the right of every person in Liberia to access public information held by government entities and public-

interest institutions. The Act promotes transparency, accountability, and civic participation in governance by requiring timely disclosure of information requested by citizens, unless specifically exempted for confidentiality or security reasons. For the DARES Project, this reinforces compliance with World Bank ESS10 on stakeholder engagement and information disclosure. Accordingly, key project documents—such as the SEP, ESCP, environmental and social assessment instruments (including Terms of Reference, draft and final reports), and periodic Grievance Mechanism (GM) reports—will be made publicly accessible through appropriate disclosure channels, including government websites, local notice boards, county offices, and community meetings.

2.4.4. Sector-Specific Frameworks

In addition to the general legal framework on environmental governance and transparency, Liberia has sector-specific legislation that directly affects the energy sector and stakeholder engagement. These frameworks define the mandates of key institutions such as RREA and LERC, and establish rules for consumer protection, rural electrification, and regulatory oversight. They are critical for ensuring that stakeholder engagement processes are consistent with sectoral policies and practices. Other relevant national instruments, such as the Land Rights Act (2018) and the Decentralization and Local Governance Act (2018), may also be considered where issues of land access, local participation, and engagement with vulnerable groups are relevant to project implementation.

- **Liberia Electricity Law (2015):** Mandates consumer protection and transparency in the licensing and regulation of electricity providers through the Liberia Electricity Regulatory Commission (LERC).
- **RREA Act (2015):** Establishes the Rural and Renewable Energy Agency (RREA), which hosts the **National PIU** responsible for implementing DARES in Liberia, including stakeholder engagement and GM operations.
- **Land Rights Act (2018):** Provides the legal framework for land rights recognition and administration, including issues relevant to land access, customary land, and community-level engagement where project activities may affect land or land-based livelihoods.
- **Decentralization and Local Governance Act (2018):** Recognizes the role of local government structures and supports participatory decision-making and local involvement in development processes, which is relevant to stakeholder engagement at county, district, and community levels.

2.5. Gap analysis on the ESS10 and national's requirements (ESMF extract)

ESSEs Policies and Objectives	National Legislation	Gap-filling measures
<p>ESS10: Stakeholders' Engagement and Information Disclosure</p>	<p>Environmental Protection and Management Law, 2002</p> <p>The EPML provides the legal basis on which stakeholders shall be consulted during and throughout the project life cycle.</p>	<p>The EPML does not require the preparation of a Stakeholders' Engagement Plan (SEP). The project has adopted and prepared a SEP as part of the compliance process with ESS10. The SEP will be implemented throughout the project implementation.</p>
<p>ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.</p>	<p>EIA Procedural Guidelines,2006, sets out the procedures involved in conducting stakeholder consultation during the conduct of an Environmental and Social Impact Assessment</p>	

3. Stakeholder identification and analysis per project pillar

This section identifies and analyzes the stakeholders relevant to the Liberia DARES Project and its pillars. Stakeholder identification is essential to ensure inclusive and meaningful engagement throughout the project lifecycle. Methodology

For the Liberia DARES regional Program, the Stakeholders were first identified using the ESRS and ESCP analyses, complemented by scoping discussions with sector agencies and county authorities. Stakeholders are grouped as affected parties, other interested parties, and disadvantaged/vulnerable individuals or groups.

3.1. Stakeholder analysis by project pillar

This section identifies the key stakeholders of the Liberia DARES Project, categorized in alignment with World Bank Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure. Stakeholder identification has been conducted **per project pillar** to reflect the distinct nature of project activities and the different groups affected or interested at each level.

Stakeholders include:

- **Project-Affected Parties (PAPs):** individuals, groups or communities who are directly affected by the project, either positively as beneficiaries or negatively through potential economic, environmental or social impacts.
- **Other Interested Parties (OIPs):** entities that have an interest in the project, including government institutions, private sector actors, civil society, and development partners.
- **Disadvantaged or Vulnerable Groups:** individuals or groups who may be disproportionately affected by project impacts or may face barriers to accessing project benefits, such as women-headed households, youth, persons with disabilities and remote rural populations.

The stakeholder analysis considers the **level of influence** and **degree of interest** of each group, to ensure that engagement methods are tailored accordingly. The tables below present stakeholders identified under each pillar of the project along with their expected roles, engagement needs, and appropriate engagement approaches.

3.1.1. Pillar 1: Connecting People

Deployment of mini-grids, standalone systems (SHS), and household electrification

Table 1: Stakeholder for mini-grid, standalone and household electrification

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Rural households in target communities	PAP	Positive (beneficiaries)	Access to electricity for basic needs	High	Medium	Community meetings, radio messaging, leaflets
Local businesses (MSMEs)	PAP	Positive (beneficiaries)	Productivity improvement through energy access	High	Medium	Business outreach forums
Land users and property owners at mini-grid sites	PAP	Potential adverse impact	Temporary or permanent land use	High	High	Land access will be based on willing buyer-willing seller arrangements or, in exceptional cases, voluntary land donations, in full compliance with ESS5 requirements and applicable national legislation.
Community-based organizations	OIP	-	Support inclusion and mobilization	Medium	Medium	Capacity-building & outreach
Community leaders (chiefs, elders, women leaders)	OIP	-	Local decision influence	High	High	Consultation and local agreements
County and District Authorities	OIP	-	Local coordination and permits	Medium	High	Coordination meetings
Traditional Land Authorities	OIP	-	Customary land negotiations	Medium	High	Land agreement facilitation
DRE companies (mini-grid & SHS providers)	OIP	-	Project implementation	High	High	Technical workshops + OHS briefings
Private solar equipment importers/distributors	OIP	-	Market participation	High	Medium	Supplier engagement
RREA - Rural and Renewable Energy Agency (PIU host)	OIP	-	National implementation and oversight	High	High	Steering + reporting
LERC - Liberia Electricity Regulatory Commission	OIP	-	Tariff approval and licensing	High	High	Policy alignment
Women-headed households	Vulnerable	Risk of exclusion	Affordability & accessibility risk	High	Low	Targeted support

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Youth and unemployed groups	Vulnerable	Risk of exclusion	May feel bypassed	Medium	Low	Youth-focused consultations
Persons with disabilities	Vulnerable	Risk of exclusion	Accessibility barriers	Medium	Low	Inclusive engagement
Informal diesel generator vendors	PAP	Potential adverse economic impact	Revenue loss risk	High	Medium	Transition dialogues
Local workers not hired by developers	PAP	Potential grievance risk	Social tension	Medium	Medium	Fair hiring communication

3.1.2. Pillar 2: Powering Economic Transformation

Productive use of energy for agriculture and rural value chains (irrigation, milling, cold storage, agro-processing, fishing, etc.)

Table 2: Stakeholders in Agriculture Value Chain

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Smallholder farmers	PAP	Positive (beneficiaries)	Improved productivity from solar irrigation/cold storage	High	Medium	Farm-level demonstrations, cooperative meetings
Farmer cooperatives & producer groups	PAP	Positive (beneficiaries)	Aggregated productive energy use	High	Medium	Cooperative engagement
Agribusinesses (rice mills, cassava processors, cocoa exporters)	PAP	Positive	Increased industrial activity	High	Medium	Business stakeholder roundtables
Rural MSMEs (mills, welders, carpenters)	PAP	Positive	Expansion of services using productive energy	High	Medium	Information sessions
Land users near productive-use installation sites	PAP	Potential adverse impact	Land access/use concerns for pumps, storage	High	Low to Medium	Prior consultation + land agreements
Ministry of Agriculture (MoA)	OIP	-	Policy alignment, rural development	High	High	Technical coordination
National Fisheries & Aquaculture Authority (NaFAA)	OIP	-	Productive energy for fisheries (ice plants)	Medium	Medium	Sector consultation
Equipment suppliers (irrigation pumps, milling machines, solar freezers)	OIP	-	Market expansion	High	Medium	Technical workshops
Microfinance institutions & rural banks	OIP	-	Co-financing productive equipment	Medium	Medium	Finance facilitation meetings

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
NGOs/CSOs in agriculture & rural livelihoods	OIP	-	Community mobilization	Medium	Low-Medium	Partnership dialogue
Women farmers & women Agri entrepreneurs	Vulnerable	Risk of exclusion	Lower access to land/finance	High	Low	Gender-sensitive outreach
Youth farmers/agribusiness startups	Vulnerable	Risk of exclusion	Access to finance and equipment barriers	High	Low	SME accelerator outreach
Remote rural communities	Vulnerable	Risk of exclusion	Low access to information finance	High	Low	Tailored communication
Traditional leaders	OIP	-	Farming community coordination	High	High	County dialogues

3.1.3. Pillar 3: Energy as a Service (EaaS)

Electrification of schools, health facilities, and water systems (social services facilities)

Table 3 : Stakeholders for institutional electrification

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Students and teachers in public schools	PAP	Positive (beneficiaries)	Improved learning environment and access to digital education	High	Medium	School-based meetings, PTA consultations
Patients and health staff in clinics/health centers	PAP	Positive (beneficiaries)	Better service delivery (vaccines, lighting, medical equipment)	High	High	Facility-level engagement
Water users in rural communities (WASH services)	PAP	Positive (beneficiaries)	Reliable water pumping through solar power	High	Medium	Community water committee consultations
Host communities around public facilities	PAP	Potential adverse impact	Chance of disputes over access/prioritization of supply	High	Medium	Community fora + local agreement protocols
Ministry of Education (MoE)	OIP	-	Oversight of school electrification	High	High	Coordination and disclosure
Ministry of Health (MoH)	OIP	-	Health facility energy access	High	High	Joint planning meetings
Liberia Water and Sewer Corporation (LWSC) / Rural Water units	OIP	-	Energy for water systems	Medium	Medium	Technical coordination
Education Facility Management Committees (FMC/PTA)	OIP	-	Local planning and security of installations	High	Medium	School committee engagement
County Health Teams (CHTs)	OIP	-	Oversight of health facility selection	Medium	Medium	County health review sessions
RREA – National PIU	OIP	-	Coordination and E&S supervision	High	High	Regular reporting + ESF compliance
Equipment suppliers – solar for social facilities	OIP	-	Provide EaaS systems & maintenance	High	Medium	Procurement briefings
Women and girls in rural areas	Vulnerable	Risk of exclusion and SEA/SH	Benefit from safer health/school environment	High	Medium	Safe-space consultations Access to project GM; Referral support through project GM
Persons with disabilities (PWDs)	Vulnerable	Risk of service inaccessibility	Require inclusive energy-based services	High	Low	Inclusive communication & design
Marginalized rural communities	Vulnerable	Risk of low participation	Often remote or isolated	High	Low	Grassroots engagement plan

3.1.4. Pillar 4: Implementation Support, Technical Assistance, and Capacity Building

Support to national institutions, regulatory development, market systems, and project governance

Table 4: Stakeholders rely on project management and implementation

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest Level	Influence Level	Engagement Approach
RREA – Rural and Renewable Energy Agency (National PIU)	OIP	–	Leads national implementation & oversight	High	High	Steering meetings, technical coordination
LERC – Liberia Electricity Regulatory Commission	OIP	–	Regulates licensing, tariffs & quality standards	High	High	Policy dialogue, regulatory consultations
Ministry of Mines and Energy (MME)	OIP	–	Sector policy direction & energy planning	High	High	Bilateral coordination
Ministry of Finance & Development Planning (MFDP)	OIP	–	Project financing oversight	High	High	Financial briefings
Environmental Protection Agency (EPA)	OIP	–	ESIA approvals, environmental monitoring	High	High	Compliance meetings
Liberia Anti-Corruption Commission (LACC)	OIP	–	Oversight of transparency and integrity	High	High	Integrity and compliance consultations
Financial Intelligence Agency (FIA)	OIP	–	AML/CFT compliance within fund flows	High	High	AML/CFT screening procedures
County and District Local Government	OIP	–	Local governance / public administration	High	Medium	County coordination meetings
Fund Manager (DARES Financing Facility)	OIP	–	Manages RBF grants & private sector financing	High	High	Operational coordination
Independent Verification Agent (IVA)	OIP	–	Verifies results and safeguards compliance	High	High	Independent reporting
Fiduciary Agent (FM/Procurement)	OIP	–	Ensures financial accountability	High	High	Compliance support
Local universities & technical institutes	OIP	–	Capacity building and training support	Medium	Medium	Academic partnerships
Industry associations (solar, energy, MSME networks)	OIP	–	Market development & private sector coordination	Medium	Medium	Dialogue forums
NGOs/CSOs active in governance/transparency	OIP	–	Promote accountability and citizen oversight	Medium	Low–Medium	Civil monitoring dialogues
Development partners (EU, AfDB, ECREEE)	OIP	–	Co-financing & policy coordination	High	High	Donor coordination platforms

4. Stakeholder Engagement Program

Effective stakeholder engagement is central to the success of the Liberia DARES Project, given its reliance on private sector operators and its focus on rural and peri-urban communities with limited access to reliable energy. The engagement program provides a structured approach for informing, consulting, and involving stakeholders throughout the project cycle. It combines national legal requirements, World Bank standards, and lessons from other energy access projects in Liberia. This section outlines the objectives, guiding principles, methods, and phased approach that will ensure stakeholders are meaningfully engaged and that their feedback informs project decisions.

The stakeholder engagement program for the Liberia DARES Project is designed to ensure systematic, inclusive, and culturally appropriate interactions with all stakeholder groups throughout the project life cycle. Engagement will be guided by the principles of inclusivity, transparency, accessibility, responsiveness, and accountability.

4.1. Engagement Objectives

The engagement objectives define the purpose of stakeholder interactions and guide the design of activities across the project cycle. They ensure that consultations are not one-off events but an ongoing dialogue that builds trust, supports accountability, and enables adaptive management.

- To provide stakeholders with timely, relevant, and understandable information.
- To ensure affected communities and vulnerable groups have opportunities to participate meaningfully.
- To build trust between project implementers and stakeholders.
- To integrate stakeholder feedback into project design and implementation.
- To establish accessible channels for grievances and responses.
- To promote transparency and prevent risks of elite capture, fund diversion, or corruption.

4.2. Engagement Principles

The principles of engagement provide the foundation for how consultations and communication will be conducted. They are aligned with ESS10 and reflect Liberia's national priorities for inclusivity, equity, and transparency.

- **Inclusivity:** Ensure participation of all groups, especially disadvantaged and vulnerable.

- **Transparency:** Share accurate and complete project information in accessible formats.
- **Accessibility:** Use local languages, community radio, and visual materials to reach remote and low-literacy groups.
- **Responsiveness:** Ensure feedback loops so stakeholder concerns influence project decisions.
- **Flexibility:** Adjust engagement methods to evolving project needs, cultural sensitivities, and security context.

In implementing the engagement plan, the following guidelines will also be followed in all activities on related to SEA/SH, and those involving minors or unaccompanied children:

- Ensure safety and security of those involved in information gathering, as well as respondents.
- No data collection from anyone who may be a SEA/SH survivor, without having the necessary information for making referral services available to them.
- No asking about personal experience during focus groups discussions
- No direct questions on SEAH/GBV. Questions to be centered on safety and security in general terms.
- Basic care and support for survivors must be available locally beforehand or before any consultations.
- Confidentiality and Consent for all discussions are paramount.

4.3. Three-stage stakeholder consultation approach under the Regional DARES MPA

In line with the Regional DARES Multi-Phase Programmatic Approach (MPA), stakeholder engagement is structured around a three-stage consultation process designed to progressively deepen participation as project decisions become more spatially and socially specific. This sequencing ensures that stakeholders are engaged at the point where decisions remain influenceable, and that consultation intensity increases as geographic footprints and potential impacts become clearer, consistent with the principles of meaningful consultation, inclusiveness, proportionality, and iterative feedback loops under ESS10.

4.3.1. Phase 1 – Strategic, Regulatory, and Market Consultations (during preparation)

Phase 1 consultations are conducted during project preparation to address upstream technical, operational, legal, and regulatory issues critical to the feasibility and scalability of the DARES Program. Engagement at this stage focuses primarily on institutional and market stakeholders, including relevant ministries, regulators, implementing entities, environmental authorities, and private sector actors. Phase 1 supports the validation of the enabling framework, clarification of institutional arrangements, and identification of regulatory and operational actions needed prior to geographic targeting and site selection.

4.3.2. Phase 2 – Site Identification and Environmental & Social Scoping (prior to detailed site selection)

Phase 2 consultations take place once the Government confirms **priority regions/zones** and, where applicable, indicative investment typologies by region. Engagement shifts to regional and district levels to support early, location-informed decision-making. In line with ESS10 and the ESMF, Phase 2 includes multi-stakeholder workshops and targeted consultations to disclose and gather feedback on siting criteria and deployment plans, identify early environmental and social risks and sensitivities, strengthen local coordination arrangements, and ensure the project grievance mechanism is known and accessible at local level. Phase 2 outputs inform subproject preparation and the design of Phase 3 engagement.

4.3.3. Phase 3 – Local and Community-Level Engagement (during implementation)

Phase 3 consultations are subproject-specific and are carried out by DRE operators / winning bidders under PIU oversight. Engagement at this stage ensures informed participation of project-affected parties, confirms site-level arrangements (including land access where relevant), discloses service conditions and implementation schedules, and operationalizes subproject-level engagement and grievance intake points consistent with the Project GM architecture.

Across all phases, consultation outcomes are documented and disclosed in appropriate and accessible formats, and stakeholder feedback is tracked and integrated into project decisions and SEP updates, consistent with the SEP being a living document.

Stakeholder engagement requires a diverse set of methods tailored to different audiences and contexts. The project will employ both traditional and modern communication channels to maximize inclusivity.

4.3.4. Methods and tools

- Public meetings and community assemblies (chiefdom/village level).
- Focus group discussions (FGDs) for women, youth, and vulnerable groups.
- Key informant interviews with government officials, developers, and community leaders.
- Workshops and stakeholder forums at national and Local Government levels.
- Radio programs and call-in shows for broad outreach.
- Printed information (flyers, posters, newsletters, GM number printed on sticker on equipment and promotional paper).
- Digital communication (social media, SMS blasts).
- Participatory monitoring activities (community scorecards, feedback surveys).

4.4. Phase 1 stakeholder consultations – purpose, scope, and key outputs (common across participating countries)

Phase 1 stakeholder engagement was conducted during project preparation to address upstream technical, operational, legal, and regulatory questions that are critical to the feasibility and scalability of the DARES Program prior to geographic targeting and detailed site selection. Building on a legal and regulatory gap analysis, consultations were designed to:

- validate the compatibility of national legal and regulatory frameworks with the DARES program architecture, including decentralized renewable energy (DRE), mini-grids, solar home systems (SHS), and Energy-as-a-Service (EaaS) models;
- review and agree on regulatory amendments, clarifications, and/or harmonisation strategies required to operationalize DARES at scale;
- test the commercial viability and implementability of proposed service delivery, tariff, and licensing arrangements with regulators and market actors; and
- delineate which issues could be resolved at framework level (Phase 1) versus those requiring area-based and subproject-level engagement in subsequent phases (Phase 2 and Phase 3), consistent with ESS10 requirements for meaningful consultation once geographic targeting and potentially affected stakeholders are known.

Phase 1 consultations engaged a broad range of institutional and market stakeholders (Other Interested Parties), including: (i) ministries responsible for energy, finance, planning, education, and health; (ii) rural electrification agencies / implementing entities and project implementation units; (iii) electricity and energy regulators; (iv) environmental authorities responsible for EIA/ESIA oversight; and (v) private sector market actors such as mini-grid and SHS/PAYGo companies, industry associations, EPC contractors, O&M providers, financiers and investors, as well as selected regional partners and technical assistance providers.

Key Phase 1 outputs include:

- validation of a technology-neutral, service-based DRE deployment approach, covering mini-grids, SHS, and EaaS solutions for households, MSMEs, and public institutions;
- broad endorsement of Results-Based Financing (RBF) and competitive allocation mechanisms as core instruments to crowd in private investment while supporting affordability and value for money;
- confirmation that existing legal and regulatory frameworks are broadly compatible with DARES but may require targeted amendments, secondary regulations, and/or contractual harmonization rather than wholesale legislative reform;

- agreement on specific regulatory recommendations (licensing regimes, tariff methodologies, ESIA proportionality, grid encroachment compensation, portfolio-level licensing, and service standards), with indicative timelines for adoption;
- where immediate regulatory change is not feasible, consensus on the use of standardized contractual templates, tariff tools, and operational guidelines to bridge remaining gaps; and
- clarification of institutional roles and sequencing, notably the respective responsibilities of implementing entities, regulators, PIUs, and private operators in licensing, tariff approval, subsidy allocation, and monitoring.

Electronic waste (e-waste) considerations were also raised during Phase 1 consultations, particularly in relation to the anticipated scale-up of SHS, batteries, inverters, and mini-grid pillars. While no site-specific solutions were defined at this stage, stakeholders agreed that Phase 2 area-based consultations will be important to inform country-appropriate e-waste collection, take-back, and recycling/disposal arrangements, including clarification of roles among operators, local authorities, and licensed waste handlers.

While the Phase 1 consultation approach and key outputs are common across participating countries under the regional DARES MPA, each country-specific SEP documents the actual consultation process undertaken during preparation through the meeting records, stakeholder participation, and consultation summaries presented in the tables below.

The findings from Phase 1 consultations were documented and will inform the iterative updating of the SEP as a living document. Key outputs will be disclosed through appropriate channels and in accessible formats, and stakeholder feedback will continue to be integrated throughout subsequent engagement phases, including the planned Phase 2 area-based consultations and Phase 3 subproject-level consultations.

Table 5: Institutional and technical consultations conducted during project preparation

Date	Venue	Participants (#M / #F)	Key issues discussed (technical / institutional)	Relevance for project implementation and future stakeholder engagement
2 June 2025	LERC Offices, Monrovia	LERC, RREA, World Bank, INENSUS (approx. 9; gender balance to be confirmed)	Alignment of Liberia's regulatory framework with the Regional DARES (R-DARES) program; private-sector-led deployment model and performance-based grants; ownership and operation of mini-grids and electrification of public institutions; licensing requirements for mini-grids and standalone solar systems (including EaaS models); construction permit requirements; applicability of tax exemptions for solar and productive-use equipment	Identified regulatory constraints affecting implementation schedules; informed the design of implementation arrangements to be reflected in guidance to operators; clarified institutional roles relevant for stakeholder engagement and grievance handling during implementation
4 July 2025	Online (virtual meeting)	LERC, RREA, World Bank, INENSUS, R-DARES team (approx. 10; gender balance to be confirmed)	Sequencing of licensing and construction permits; licensing during construction and extension after commissioning; tariff regulation thresholds; treatment of small systems (<100 kW); investor risk mitigation and stabilization clauses	Improved regulatory predictability for private operators; provided inputs for operational guidance to DRE companies; supported integration of regulatory considerations into communication and grievance management arrangements
18 July 2025	Online (virtual meeting)	LERC, RREA, World Bank, INENSUS, R-DARES team (approx. 9; gender balance to be confirmed)	Applicability of stabilization clauses to DRE projects and EaaS contracts; sequencing of grant agreements, licensing, and financial close; confirmation of registration regime for EaaS systems under 100 kW; tariff revision provisions; fiscal incentives through Executive Orders	Confirmed regulatory conditions underpinning private-sector participation; clarified implementation rules to be communicated to operators and service providers; helped define the scope and timing of future community-level stakeholder engagement

4.5. Phase 2 consultations – Government-selected priority regions and investment typologies

Phase 2 stakeholder engagement will take place once the Government confirms the priority regions/zones for DARES investments, based on agreed eligibility and prioritization criteria. Depending on regional characteristics and needs, the Government may also define priority investment typologies by region (e.g., mini-grids, standalone/household solutions, electrification of social services facilities through EaaS, and productive-use interventions).

Purpose and link to Phase 1 and Phase 3. Phase 2 is designed to establish a clear bridge between:

- (i) **Phase 1**, which focused on upstream technical, operational, legal, and regulatory consultations primarily with institutional and market stakeholders; and
- (ii) **Phase 3**, which will involve subproject-level engagement and meaningful consultations with project-affected parties once specific sites and beneficiary communities are identified.

In line with ESS10, Phase 2 consultations will focus on meaningful engagement and consultation at regional and district levels, with tailored measures to ensure the inclusion of disadvantaged and vulnerable groups (women, youth, persons with disabilities, remote or marginalized communities). Phase 2 consultations will aim to:

- communicate Government decisions on priority regions/zones and indicative investment typologies;
- disclose and gather feedback on proposed siting criteria and deployment approaches (including how sites will be screened and selected);
- validate regional priorities and confirm the relevance and acceptability of the proposed investment mix;
- identify early environmental and social risks, sensitivities, and potential exclusion factors (including land tenure issues, social tensions, SEA/SH risks, misinformation, and potential conflict dynamics);
- undertake preliminary environmental and social scoping and screening consultations aligned with the ESMF and SEP, to support proportionate risk management prior to detailed site selection;
- agree on local coordination arrangements, community entry protocols, and a consultation calendar to guide Phase 3 subproject-level consultations; and
- ensure that the Project Grievance Mechanism (GM) is introduced, understood, and accessible at district and chiefdom/community levels, including confidential channels for SEA/SH- and integrity-related grievances.

Documentation and feedback loops.

Outcomes from Phase 2 consultations will be documented and summarized through standardized consultation templates, attendance records (sex-disaggregated), and a feedback matrix linking issues raised to agreed follow-up actions. Key outputs will be disclosed through appropriate channels and in accessible formats. Phase 2 findings will inform project planning and sequencing, stakeholder mapping updates, tailored communication materials, and the preparation of Phase 3 engagement requirements for DRE operators and contractors.

The table below presents the planned Phase 2 consultations and coordination arrangements, including triggers, geographic scope, lead and supporting entities, stakeholder groups to be invited, consultation topics, methods and tools, expected outputs, and indicative timing. This plan will be refined once priority regions/zones and investment typologies are confirmed and will be updated as part of the SEP's iterative implementation.

Table 6 : Phase 2 consultations – Government-selected priority regions and investment typologies (planning table, standard)

Consultation stage (Phase 2)	Trigger / starting point	Geographic scope	Lead entity	Supporting entities	Stakeholders invited (regional/district level)	Key topics (tailored by region and investment type)	Methods / tools	Outputs / deliverables	Indicative timeline
2A – Regional launch consultation (per priority region/zone)	Government confirms priority regions/zones and indicative investment typologies	Each selected priority region/zone (regional hub + key districts)	National PIU (country-specific host institution)	Relevant sector ministries; district councils/local authorities; chiefdom authorities; regulator (as needed); environmental authority (as needed)	District councils/local authorities; paramount/section chiefs; community leaders; women leaders; youth groups; persons with disabilities (PWD) representatives; CSOs/CBO as the LEAP Network; MSME associations; farmer/producer groups; consumer associations (where available)	Government decision and criteria; overview of planned investment typologies; roles and responsibilities; inclusion measures; introduction of GM channels and escalation routes; early risks/sensitivities (land, SEA/SH, misinformation); next steps toward Phase 3	Multi-stakeholder regional workshop; Q&A sessions; radio announcements; distribution of simplified factsheets; disclosure posters/notice boards	Minutes and attendance list (sex-disaggregated); stakeholder mapping update for the region; risk & sensitivity log; feedback matrix (issues raised → response/action); agreed Phase 3 consultation calendar	Once per selected region/zone
2B – District/chiefdom coordination consultations	After 2A and prior to detailed site identification	Target districts/chiefdoms in the selected region	National PIU + district councils/local authorities	Chiefdom authorities; CSOs/CBOs; sector reps (education/health/water)	District authorities; chiefdom leadership; local CSOs/CBOs; facility committees; local service providers; vulnerable group representatives	Local entry protocols; disclosure channels and trusted intermediaries; local GM intake points; expectations management; security/access constraints; preparation for Phase 3	District coordination meetings; key informant interviews; targeted FGDs (women/youth/PWD, as needed)	District stakeholder list; agreed local entry points; local disclosure plan; GM awareness evidence; updated risk/sensitivity log	1–2 rounds per selected region/zone
2C – Sector consultations for social services electrification (EaaS)	If EaaS/social facilities electrification is prioritized in the region	District level + relevant line ministries	National PIU	Relevant line ministries; district health/education teams; WASH units	Facility managers (schools/health centers); school management committees/PTA; district health teams; water user committees; local authorities	Facility selection criteria; responsibilities for O&M/security; accessibility/inclusion; management of expectations; GM access; SEA/SH risk awareness	Sector planning sessions; facility-level meetings; targeted consultations	Candidate facility list and prioritization rationale; agreed responsibilities and O&M arrangements; consultation records; feedback matrix	Once per selected region/zone where applicable
2D – Productive-use consultations (Pillar 2)	If productive-use interventions are prioritized in the region	District hubs / value-chain clusters	National PIU	Agriculture extension services; cooperatives; CSOs; MFIs	Farmers; producer organizations/cooperatives; agribusiness; rural MSMEs; MFIs; women/youth entrepreneurs	Value chain priorities; productive-use equipment needs; financing constraints; siting considerations; land sensitivities; inclusion and affordability	Roundtables; demonstrations (where feasible); FGDs (women/youth groups); SME outreach sessions	Productive-use needs assessment note; updated stakeholder mapping; tailored outreach plan; feedback matrix	Once per selected region/zone where applicable

Consultation stage (Phase 2)	Trigger / starting point	Geographic scope	Lead entity	Supporting entities	Stakeholders invited (regional/district level)	Key topics (tailored by region and investment type)	Methods / tools	Outputs / deliverables	Indicative timeline
2E – Private sector / market consultations (regional or national)	After investment typologies and implementation approach are confirmed; repeated per grant cycle	National + regional hubs	Fund Manager + National PIU	Regulator; sector ministry; PIU communications; relevant agencies	DRE/EaaS providers; suppliers; MFIs; industry associations; EPC/O&M firms	Requirements for Phase 3 consultations; E&S screening and reporting obligations; GM requirements (subproject entry points); integrity/AML expectations; consumer protection; e-waste responsibilities (take-back / collection mechanisms)	Briefings; webinars; technical sessions; Q&A clinic	Updated guidance package for operators (Phase 3 checklist); Q&A log; disclosure materials; training attendance records	At least once early + per grant cycle

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

This section provides a consolidated summary of stakeholder engagement needs and the corresponding methods, tools, and techniques to be applied at different stages of the project cycle. It serves as an operational planning tool to ensure that relevant stakeholder groups receive timely, appropriate, and accessible information, and that engagement activities are conducted in a consistent and structured manner throughout project preparation, implementation, and monitoring.

This summary is aligned with the three-stage consultation approach adopted under the Regional DARES MPA (Phase 1 – strategic/regulatory consultations; Phase 2 – area-based consultations and environmental and social scoping; Phase 3 – subproject-level engagement and community consultations). While Phase 1 engagement is largely completed during preparation and documented through consultation records, Phases 2 and 3 will be implemented as the Government confirms priority regions/zones and as specific subprojects are identified and rolled out.

The table below identifies stakeholder groups that are concerned by, or are recipients of, engagement activities at each project stage, including Project-Affected Parties (PAPs), Other Interested Parties (OIPs), and vulnerable or disadvantaged groups requiring tailored engagement measures. The inclusion of institutional actors in this summary reflects their need to receive information, data, and outputs generated through stakeholder engagement processes (including disclosure and reporting) and to coordinate on implementation aspects. It does not imply consultation for validation purposes, decision-making authority, or endorsement roles, unless explicitly provided for under applicable legal and institutional mandates.

Implementation of these engagement activities will be monitored by the PIU through consultation logs, disclosure records, and GM reporting, and will be reflected in quarterly and annual SEP implementation reports.

Table 7 : Summarizes engagement by project stage, stakeholders, topics, methods, responsibilities, and frequency

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
Preparation (Phase 1 and early Phase 2 planning)	General public; national authorities (MoE, LERC, EPA-Liberia); District Councils and Chiefdom authorities; DRE/EaaS companies; EDSA-hosted PIU (PMU/PIT – existing structure); Regional Coordination Unit (RCU)	Project objectives and scope; eligibility criteria; environmental and social requirements; stakeholder engagement framework; grievance mechanism principles; key regulatory messages (licensing, tariffs/service conditions as applicable); overview of planned consultation phases	Public meetings; technical workshops; document disclosure via websites, radio and local notice boards; targeted briefings with sector ministries (e.g., Health/Education for EaaS); publication of key project information in accessible formats	PIU (RREA); RCU; MME (oversight); LERC (regulatory inputs)	Project launch; as needed during preparation
Grant Application & Review (pre-implementation)	Private developers/service providers; PIU (RREA); Fund Manager; LERC (as relevant to licensing/regulatory requirements); potential host communities (information disclosure); Independent Verification Agent (IVA)	Grant eligibility criteria; E&S screening requirements; community engagement obligations (Phase 3 requirements); GM requirements (including local entry points and escalation); licensing/regulatory compliance requirements (as applicable);	Information sessions; bilateral meetings; publication of eligibility and E&S criteria; disclosure of subproject engagement requirements and GM entry points; standardized guidance package for operators (as applicable)	Fund Manager (review); PIU (information and guidance); LERC (regulatory clarifications as needed)	Per grant cycle

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
		integrity/AML expectations (as applicable)			
Implementation (Phase 3 subproject-level engagement)	Communities; MSMEs; schools; health facilities; water user committees; District Councils; Chiefdom/community leaders; vulnerable groups; DRE/EaaS providers; PIU (RREA)	Connection procedures; tariffs/service conditions; construction impacts and mitigation measures; community expectations; safety and OHS messages; GM access and procedures (including confidential channels for SEA/SH); inclusion measures; e-waste and end-of-life equipment handling messages (as applicable)	Community meetings; focus group discussions; surveys; local radio communication; facility-level engagement (schools/clinics/water systems); site signage and disclosure materials; targeted outreach to vulnerable groups; subproject-level engagement checklist and reporting	PIU (oversight and monitoring); Community Liaison Officers (CLOs)/social mobilization teams; DRE/EaaS providers (subproject-level engagement); District/Chiefdom structures (facilitation)	Quarterly and as needed (with intensified engagement during mobilization and construction phases)
Verification & Monitoring	Communities; CSOs/CBOs; DRE/EaaS operators; District authorities; PIU (RREA); Independent Verification Agent (IVA)	Verification of commitments; compliance with E&S and engagement obligations; feedback on project performance; grievance trends and resolution effectiveness; lessons learned and corrective actions	Field visits; spot checks; monitoring missions; beneficiary feedback surveys; disclosure of summary results (non-sensitive); review of operator engagement records and GM functionality	IVA (verification); PIU (follow-up and reporting); Fund Manager (as applicable for RBF)	Semi-annual (or aligned with disbursement verification cycles)

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
Capacity Building	District authorities; Chiefdom/community leadership structures; CSOs/CBOs; women and youth groups; DRE/EaS providers; PIU (RREA); RCU; CLOs/social mobilization teams; GM focal points/operators; project workers/contractors (as applicable)	Energy literacy; stakeholder engagement practices; GM awareness and operation; SEA/SH prevention and mitigation; inclusion of vulnerable groups; Code of Conduct; case reporting, management and referrals; data confidentiality and responsible information management	Training sessions; workshops; awareness campaigns; practical tools and guidelines; peer-learning sessions	PIU; RCU; NGOs/CSOs (as relevant); LERC (regulatory capacity sessions where needed)	Semi-annual (and as needed based on implementation schedule and risk profile)

4.7. Proposed strategy to incorporate the views of vulnerable groups

Engagement with vulnerable groups will use tailored strategies to overcome barriers to participation: separate meetings for women and youth; accessible venues for persons with disabilities; use of local translators and community radio; and confidential SEA/SH reporting channels within project GM at all levels. CLOs will proactively identify vulnerable stakeholders and track their participation in consultation logs (Kobo).

Engagement approaches in rural communities will prioritize oral communication methods, culturally appropriate facilitation, and the use of trusted community structures. Special attention will be given to the inclusion of women, youth, and groups traditionally excluded from decision-making processes.

4.8. Adaptive Engagement (Living SEP)

The SEP is designed as a living instrument to ensure that stakeholder engagement remains responsive to evolving project conditions, emerging risks, and stakeholder feedback throughout the Project lifecycle.

In accordance with the Environmental and Social Commitment Plan (ESCP), the SEP shall be updated by the PIU within two (2) months of the Project Effective Date, and resubmitted to the World Bank for approval. Thereafter, the SEP shall be reviewed periodically and revised as necessary to reflect the engagement of new stakeholders, changes in stakeholders' consultations, adaptive management of Project changes, unforeseen circumstances, or implementation performance.

4.8.1. Review Triggers and Frequency

Following the initial update required under the ESCP, the SEP will be reviewed by the PIU and resubmitted to the World Bank for approval:

- At least annually during Project implementation;
- Following significant changes in Project scope, design, institutional arrangements, or geographic focus;
- Where monitoring findings, stakeholder feedback, grievance trends, or incidents indicate the need to adjust engagement strategies.

4.8.2. Responsibility for Review

The Project Implementation Unit (PIU), hosted within the Ministry of Energy, shall be responsible for conducting the review of the SEP.

The Environmental and Social Specialists within the PIU shall:

- Assess the effectiveness of stakeholder engagement activities;
- Review stakeholder identification and engagement approaches;
- Consolidate inputs from consultation records, grievance data, monitoring reports, and supervision findings;
- Prepare proposed revisions to the SEP where required.

The PIU Coordinator shall validate the revised draft prior to submission.

4.8.3. Approval and Disclosure

In accordance with the ESCP, any revision of the SEP shall be submitted to the Association for prior written agreement.

Following receipt of such agreement, the updated SEP shall be:

- Formally adopted by the Ministry of Energy;
- Publicly redisclosed through the same channels as the original SEP.

No revised version of the SEP shall be implemented prior to obtaining the Association's written agreement.

4.8.4. Documentation and Version Control

Each revised version of the SEP shall:

- Indicate the revision date and version number;
- Include a summary of changes introduced;
- Be archived by the PIU to ensure traceability and institutional continuity.

Through this structured process, stakeholder engagement under the Project shall remain consistent with ESS10 requirements and fully aligned with the obligations set out in the ESCP.

4.9. Stakeholder Engagement at the Subproject Level

In line with the three-phase consultation approach described in Section 4.3 Phase 3 is the engagement of stakeholders at the **subproject level** once specific sites, beneficiary communities, and local implementation arrangements are identified. This phase is essential to ensure **meaningful consultation and information disclosure** with Project-Affected Parties (PAPs) and other relevant local stakeholders, confirm site-level expectations and risks, and operationalize accessible grievance intake points. Subproject-level engagement will be implemented by DRE/EaaS operators under PIU oversight and will be documented through standardized tools and reporting requirements consistent with ESS10.

While the SEP defines the overall framework for stakeholder engagement at the national and regional levels, the Liberia DARES Project also requires each subproject implemented by private operators (DRE/EaaS companies) to undertake stakeholder engagement activities at **site and community level**. This requirement is essential to ensure that local stakeholders are informed and consulted on specific interventions, that local risks and sensitivities are identified early, and that communities have accessible channels to raise questions and concerns related to the subproject.

To operationalize this requirement, the Project will establish a standardized Subproject Stakeholder Engagement Checklist to be completed by each DRE/EaaS company as part of subproject preparation and implementation. The checklist will serve both as:

- a guide for minimum engagement and disclosure requirements; and
- a reporting tool to document compliance and enable PIU supervision, consistent with ESS10.

Minimum requirements for subproject-level stakeholder engagement include:

- Identification and mapping of local stakeholders, including Project-Affected Parties (PAPs), local authorities, traditional/community leaders, vulnerable groups, and relevant CSOs/CBOs. At a minimum, two consultations will be conducted at subproject level
 - (i) an initial consultation to inform communities about proposed activities, timelines, and siting considerations; and
 - (ii) a follow-up consultation to discuss planned commitments, expected benefits, potential disturbances, mitigation measures, community expectations, and limitations or constraints of the intervention.
 - (iii) Additional consultations will be undertaken where needed, depending on the nature and risk profile of the subproject, including where land-related issues arise, vulnerable groups require targeted engagement, grievance patterns emerge, or significant design or implementation changes occur.
- Disclosure of key subproject information in accessible formats and local languages as needed, including tariffs and service conditions, safety messages, implementation schedules, and the local grievance mechanism (GM) entry points and escalation pathways.
- Maintenance of a simple record of consultations, including minutes, attendance lists (sex-disaggregated), photos, signed forms, and a short summary of issues raised and responses provided (feedback loop).
- Submission of the completed checklist and supporting documentation to the National PIU for verification, record-keeping, and inclusion in project reporting.

Supervision and accountability

- The Fund Manager will review subproject stakeholder engagement documentation (including the completed checklist) as part of the grant application and approval process, where applicable.
- The National PIU will provide guidance to DRE/EaaS companies, compile and archive the documentation, track compliance, and integrate subproject engagement reporting into national SEP implementation reports.
- The Independent Verification Agent (IVA) will verify, through spot checks and field missions, that engagement obligations have been fulfilled at the community level and that the GM is accessible and functional.

Subproject-level stakeholder engagement requirements will be reflected in relevant procurement/grant documentation and contractual arrangements to ensure

enforceability and consistent implementation. By ensuring that stakeholder engagement is implemented not only at the programmatic level but also at the subproject level, the Liberia DARES Project reinforces transparency, accountability, and community trust across all scales of intervention.

4.10. SEP implementation planning

The implementation of the Stakeholder Engagement Plan (SEP) for the DARES Regional Project is organized through operational sequencing designed to support the rollout of Phase 2 (regional consultations) and Phase 3 (site-level consultations and continuous engagement). Since Phase 1 of the SEP—covering institutional and regulatory consultations—has already been completed, the planning below details the structured steps for the upcoming engagement activities.

4.10.1. SEP Phase 2 – Regional Consultations

Operational Sequence 1 – Site Identification (March 2025)

Objective: Define the territorial scope of regional consultations.

Activities to be carried out:

- Official selection of project investment sites by the respective governments.
- Confirmation of affected regions and zones of influence.
- Preliminary identification of relevant regional and local stakeholders.
- Transmission of site information to the Project Implementation Units (PIUs) to initiate consultation planning.

Operational Sequence 2 – Preparation and Implementation of Regional Consultations (April – May 2025)

April 2025– Preparation of the Consultation Process (PIUs)

Objective: Structure and organize regional consultation activities.

Activities to be carried out:

- Updating stakeholder mapping based on confirmed sites.
- Preparation of a detailed consultation plan (methodology, tools, schedule, responsibilities).
- Development of information materials and consultation tools.
- Logistical and institutional coordination.

May 2025– Implementation of Regional Consultations

Objective: Inform stakeholders and collect structured feedback.

Activities to be carried out:

- Organization of regional information and consultation meetings.
- Collection of concerns, expectations, and recommendations.

- Formal documentation of consultations (minutes, attendance sheets, summary reports).
- Integration of consultation outcomes into environmental and social instruments.
- Consultations conducted during May 2025

4.10.2. SEP Phase 3 – Site-Level Consultations and Continuous Engagement During Project Implementation

Operational Sequence 3 – Stakeholder Engagement at Investment Site Level (Construction Phase)

Objective: Ensure continuous, structured stakeholder engagement during project implementation.

Primary Responsibility: Contracted companies, under the supervision of the PIUs.

Activities to be carried out:

- Prior information disclosure to communities before commencement of works.
- Organization of site-level engagement meetings.
- Establishment and operationalization of the Grievance Mechanism (GM) at site level.
- Periodic communication on construction progress and temporary risks (traffic, nuisance, safety).
- Continuous documentation and archiving of stakeholder engagement activities.

Compliance Requirement:

- Mandatory completion of the SEP checklist annexed to the document by each contractor.
- Submission of the completed checklist to the PIU.
- Formal validation by the PIU prior to and during implementation.
- Use of the checklist as a compliance monitoring and supervision tool.

Timeline:

- Initiated upon contract award.
- Implemented continuously throughout the duration of works and exploitation phase if necessary.

5. Resources and Responsibilities for Implementing Stakeholder Engagement

Effective stakeholder engagement requires clear coordination, mechanisms, roles, and adequate resources. This section defines the institutional responsibilities for implementing the Stakeholder Engagement Plan (SEP) for the Liberia DARES Project, along with the human and financial resources required to ensure inclusive, transparent, and accountable engagement throughout the project lifecycle.

5.1. Regional-Level Roles and Stakeholder Engagement

While stakeholder engagement is implemented at the national level in each participating country, coordination at regional level ensures alignment across the multi-country DARES Program. Regional actors provide technical guidance and quality assurance, but they **do not interact directly with stakeholders in Liberia**.

Table 8 : Roles of regional entity in the stakeholder engagement

Regional Entity	Role	Engagement Modality
Regional Coordination Unit (RCU)	Provides technical guidance on Environmental and Social (ESF) compliance, including ESS10 implementation; consolidates SEP progress reporting from national PIUs	Quarterly virtual coordination meetings with Liberia PIU; review of national SEP progress
Fund Manager	Manages the regional Results-Based Financing (RBF) facility and screens private companies for eligibility, including minimum E&S requirements Reviews grievances related to grant eligibility and compliance (via PIU referral only) Financial transparency and integrity Handles integrity-related grievances (fraud, corruption, AML/CFT) referred by PIU; provides fiduciary oversight	Technical exchanges with PIU on private sector pipeline; joint information sessions for DRE companies Ensures fiduciary compliance and integrates AML/CFT checks with SEP and GM processes
Independent Verification Agent (IVA)	Verifies RBF results and assesses compliance with SEP and Grievance Mechanism (GM) requirements at subproject level	Field verification missions: validation reports shared with PIU and World Bank

Regional engagement remains coordinative only. All stakeholder engagement activities in Liberia are implemented at the national level by the Project Implementation Unit (PIU), and by the DRE companies

5.2. National Level

The Environmental Protection Agency (EPA–Liberia) is mandated to regulate the environmental licensing and ESIA process and to ensure compliance with public participation requirements during environmental assessment and permitting.

Developers and project entities are generally expected to:

- Submit Terms of Reference (ToRs) for ESIA studies to the EPA for review and approval, where required;
- Conduct consultations during the scoping, draft, and final phases of the ESIA process, including engagement with affected communities and relevant stakeholders;
- Provide evidence of stakeholder engagement as part of the ESIA submission package (e.g., meeting minutes, attendance lists, disclosure records, stakeholder feedback summaries);
- Document how stakeholder comments and concerns have been addressed, including the integration of mitigation measures into project design and ESMPs.

For the Project, these requirements reinforce the need to conduct early and continuous consultations, document stakeholder inputs, and demonstrate responsiveness to concerns in line with ESS10.

The SEP is implemented under the leadership of the Ministry of Mines and Energy (MME) through the Project Implementation Unit (PIU) hosted by the Rural and Renewable Energy Agency (RREA). The PIU is the main entity responsible for planning, executing, and reporting stakeholder engagement activities.

Table 8 presents the functional roles and institutional responsibilities required to implement stakeholder engagement activities under ESS10. These functions are delivered through a combination of existing PIU staff (including designated focal points/multi-tasking) and any incremental resources financed under the Project. Table 9 reflects only the incremental SEP staffing and operational costs specifically budgeted for SEP implementation

Table 9 : Roles of national entity in the stakeholder engagement

Institution	Responsibilities
Ministry of Mines and Energy (MME)	MME provides national oversight; fiduciary control managed by Regional Fiduciary Agent in coordination with PIU FM staff
RREA – National Project Implementation Unit (PIU)	Leads SEP implementation and reporting; ensures stakeholder consultation, disclosure, and inclusion; manages the Grievance Mechanism Acts as the official registration and coordination authority of the GM. Grievances may be received locally by CLOs and community structures, but all cases must be formally registered and managed by the PIU Grievance Mechanism Information System (GMIS)
Environmental and Social & GBV (E&S) Specialists – PIU	Coordinate SEP implementation, prepare consultation plans, document engagements, ensure ESS10 compliance
Grievance Mechanism Focal Point – PIU	Manages grievance intake, resolution process, documentation, and reporting
Communications and Outreach Officer – PIU	Develops and disseminates project information; manages awareness campaigns

Community Liaison Officers (CLOs)	Facilitate consultations at local level; conduct community mobilization; support grievance handling, one of the entry point for the GM
County and District Authorities	Facilitate engagement at local level; support dispute resolution and disclosure
Traditional and community leaders	Enable local acceptance and culturally appropriate engagement
Civil society and community-based organizations	Support community outreach, inclusion of vulnerable groups, and awareness building
Private sector actors (DRE companies)	Conduct stakeholder engagement at subproject level following PIU guidance and SEP tools

5.3. Modalities for SEP Implementation

The following operational modalities will guide the implementation of stakeholder engagement activities under the Project. Together, they define the main actions that will support disclosure, consultation, inclusion, documentation, grievance management, and reporting throughout the project cycle, while clarifying the roles of the PIU, CLOs, and DRE operators/service providers as applicable.

The following operational modalities will guide stakeholder engagement activities:

- Development of a communication and consultation plan updated annually by the PIU, with adjustments as needed based on implementation progress and stakeholder feedback
- Disclosure of project information in English and local languages
- Consultations during planning, implementation, and monitoring at project and subproject levels, including those undertaken by DRE operators/service providers under PIU oversight
- Inclusion strategies for vulnerable and disadvantaged groups
- Coordination meetings with national and local stakeholders
- Documentation of stakeholder engagement through Kobo Toolbox and field reports
- Integration of stakeholder feedback into project decision-making
- Grievance Mechanism operation at national and community level
- Quarterly reporting to MME and the World Bank

5.4. Human Resources for SEP Implementation

SEP implementation will be supported by the following dedicated personnel:

- 1 Social Specialist, and 1 Gender-based Violence (GBV)/SEA/SH Specialist
- 1 Communications & Outreach Officer
- 1 GM Focal Point
- 4–6 Community Liaison Officers (CLOs) 4 Community Liaison Officers (CLOs), or such number as may be confirmed during implementation
- Technical support (gender/SEA–SH specialist, facilitation experts) as needed

5.5. SEP Implementation Budget

An indicative budget of **USD 1,491,500** has been allocated to support SEP implementation. The budget covers stakeholder consultation costs, communication, grievance redress operations, capacity-building, and monitoring. The budget will be refined during project appraisal and integrated into the National PIU Annual Work Plan.

6. Grievance Mechanism

The Grievance Mechanism (GM) for the Liberia DARES Project is a structured, accessible, and transparent system that allows project stakeholders to submit complaints, concerns, inquiries, or suggestions related to project activities. The GM enables the Project Implementation Unit (PIU) to receive, register, assess, and resolve grievances in a timely and fair manner, while promoting accountability and preventing project-related risks, including social tension, exclusion, misconduct, fraud, and abuse.

The GM applies to all pillars of the Liberia DARES Project and covers grievances related to project impacts, access to project benefits, service delivery by Distributed Renewable Energy (DRE) companies, labor issues, land access, exclusion of vulnerable groups, environmental and social risks, financial integrity concerns, and cases of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

Community- and stakeholder-related grievances will be handled through the project GM. Worker grievances will be addressed through the worker grievance arrangements established under the applicable labor management procedures. SEA/SH-related cases will follow special confidential and survivor-centered referral protocols, while integrity-related complaints, including fraud, corruption, and AML/CFT concerns, may be referred to the appropriate competent authorities in accordance with the applicable procedures.

The mechanism operates nationwide and is centralized at the National PIU hosted by the Rural and Renewable Energy Agency (RREA), with community-level accessibility ensured by Community Liaison Officers (CLOs) and local authorities. The PIU is the sole entity authorized to register and track grievances to prevent manipulation or suppression of complaints by any intermediary, including private developers. Complaints may be escalated to the Regional Coordination Unit (RCU), the Fiduciary Agent, or the World Bank's Grievance Redress Service (GRS) if not resolved satisfactorily.

Where relevant, the DARES grievance mechanism will build on and coordinate with existing grievance mechanisms implemented by RREA under ongoing projects, such as LESSAP, including the use of existing hotlines and referral arrangements, while ensuring compliance with ESS10 requirements.

6.1. Objectives and Principles

The objective of the GM is to strengthen project transparency, enable trust-based communication with communities, and prevent conflict through early identification and resolution of project-related concerns.

6.1.1. Objectives

The GM aims to:

- Provide safe, accessible, and inclusive grievance channels for all stakeholders;
- Ensure systematic registration and tracking of all grievances in the GM Information System (GMIS);
- Resolve grievances fairly, transparently, and in a timely manner;
- Refer sensitive cases (SEA/SH, corruption, AML/CFT) through specific confidential protocols; and to relevant and accessible service providers/ local complaints and redressal systems;
- Promote constructive dialogue and social cohesion in project areas;
- Use grievance trends to improve project implementation and prevent recurrence.
- Grievances related to fraud, corruption, or AML/CFT risks will follow a separate confidential process and may be referred to relevant national authorities.
- Complainants retain the right to access administrative and judicial remedies at any stage of the process.

6.1.2. Guiding Principles

The Liberia DARES GM is based on the following principles:

Table 10 : Principle of the regional DARES GM

Principle	Description
Accessibility	Multiple safe channels (local, phone, online) without barriers of cost, literacy, location, or gender
No retaliation	Complainants are protected from intimidation or retaliation
Confidentiality	Sensitive complaints handled under strict confidentiality
Centralized intake	All grievances officially logged at PIU level to prevent interference
Fair resolution	Complaint handling guided by neutrality and respect
Transparency	Each case tracked with a unique number and status updates
Responsiveness	Clear service standards for acknowledgment and resolution
Appeal rights	Every complainant may escalate a grievance if not satisfied

6.2. Institutional Arrangements for GM

The Grievance Mechanism (GM) relies on clear institutional responsibilities to ensure that grievances are received, processed, and resolved in a timely and accountable manner. The GM is managed at national level and coordinated with entities at local and regional levels as required.

Table 11 ; Institutional Arrangements and Roles for the Grievance Mechanism

Institution / Entity	Responsibility within the GM
National PIU (RREA)	The PIU is the official registration and coordination authority of the GM. Grievances may be received locally by CLOs or community structures but must be formally recorded through the PIU GMIS Can also serve as intake for grievances, registers

	Must tracks all cases in the GM Information System (GMIS); refers grievances to the appropriate entity for resolution; validates resolution with complainants; ensures documentation
GM Focal Point (within PIU)	Manages day-to-day GM operations, including intake verification, classification, referrals, resolution tracking, communication with complainants, and preparation of GM reports
Community Liaison Officers (CLOs)	Serve as local access points for grievances at community level; support filing of cases; facilitate awareness and inclusion of vulnerable groups; ensure transmission of complaints to the PIU
County and District Authorities	Support CLOs in grievance communication and facilitate local dialogue where needed
DRE Companies	Address grievances related to service delivery, tariffs, installation works, labor issues, or local impacts at the project site level when cases are referred to them by the PIU
Fund Manager (Regional Level)	Handles grievances related to Results-Based Financing (RBF) grant eligibility criteria and performance-based payments Addresses grievances related to financial irregularities, fraud, corruption, or potential money laundering, in coordination with the Financial Intelligence Agency (FIA) if required
Independent Verification Agent (IVA)	Conducts independent verification of grievance resolution and carries out spot checks to ensure fair handling
Regional Coordination Unit (RCU)	Consolidates grievance reports submitted by national PIUs and oversees consistency of GM performance across countries
National legal system	Complainants may seek recourse through national judicial or administrative systems at any time, should they not be satisfied with the project GM
World Bank	Provides oversight and may receive escalated grievances through the Grievance Redress Service (GRS) if complainants are not satisfied with project-level resolution

6.3. Grievance Uptake Channels and Accessibility

The Liberia DARES Grievance Mechanism is designed to be accessible to all stakeholders, including individuals with low literacy, those in remote locations, and members of vulnerable groups. Multiple channels are available to ensure that grievances can be submitted safely and without barriers. Cases may be submitted anonymously if requested by the complainant. Project-specific contact details, including hotline numbers, email address, web links, and physical submission locations, will be finalized and inserted prior to public disclosure and updated as needed after project effectiveness.

Grievances may be submitted through any of the following channels

Table 12 : Grievance Mechanism Uptake Channels and Responsible Entities

Community Liaison Officers (CLOs)	In-person submission at community level during meetings or field visits	CLOs (forward to PIU)
Local authorities	Submission through town chiefs, elders, or district offices	CLOs and PIU
GM Hotline	Toll-free or standard call line managed by the PIU	PIU GM Focal Point
SMS/WhatsApp line	Allows discreet communication and simplified submissions	PIU GM Focal Point
GM Email	Dedicated project email for written complaints	PIU GM Focal Point
Web form/online submission	Digital submission through project or RREA website	PIU GM Focal Point
Suggestion/complaint boxes	Boxes located in public facilities such as schools, clinics or local offices	CLOs (secure collection and transfer)
Written letters	Delivered directly to the PIU office or RREA headquarters	PIU Secretariat
Referral from other mechanisms	Cases referred by civil society, NGOs, traditional leaders or World Bank GRS	PIU GM Focal Point

Measures will be taken to ensure accessibility:

- Information on the GM will be disclosed in plain language in English and local languages (Kpelle, Bassa, Lorma, etc.).
- CLOs will receive training on inclusive grievance support, including how to assist complainants unable to read or write.
- Vulnerable groups, including women, youth, persons with disabilities, and remote communities, will receive targeted awareness and dedicated focus groups so they can express freely their views
- Anonymous reporting will be permitted to ensure protection from retaliation.
- Special confidential channels will be used for sensitive cases, including SEA/SH and financial integrity complaints.

6.4. Grievance Resolution Procedure

The Liberia DARES Grievance Mechanism follows a structured and time-bound process to ensure consistency, traceability, fairness, and transparency. All grievances are handled according to the steps below. No grievance may be rejected or dismissed without registration and follow-up by the PIU. DRE companies and contractors will address grievances at first level related to service delivery, installation works, and local impacts, under the oversight of the PIU and within a centralized grievance management system.

Table 13 : Grievance resolution process

Step	Description	Timeframe	Responsibility
Step 1: Uptake	Grievance received through CLOs, hotline, SMS/WhatsApp, email, website, written letter, or grievance box	Day 0	CLOs and PIU
Step 2: Registration and Acknowledgment	PIU logs the case in the GM Information System (GMIS), assigns tracking number, and acknowledges receipt to complainant	Within 2 working days	PIU GM Focal Point
Step 3: Screening and Categorization	Complaint classified by type (service, land, labor, environment, SEA/SH, AML/CFT, etc.) and urgency	Within 2 working days	PIU GM Focal Point
Step 4: Referral	PIU assigns complaint to responsible entity for resolution (DRE Company, Fund Manager, Fiduciary Agent, Contractor, Local Authority)	Immediately after screening	PIU GM Focal Point
Step 5: Investigation and Resolution	Responsible entity investigates and proposes resolution based on agreed standards and procedures	10 to 15 working days	Assigned entity
Step 6: Verification of Resolution	PIU contacts complainant to confirm satisfaction before closing the case. If unresolved, escalation applies	Within 5 working days	PIU GM Focal Point
Step 7: Closure or Escalation	Case closed if resolved; otherwise escalated to PIU Management, RCU, or World Bank GRS	As needed	PIU / RCU / WB GRS
Step 8: Independent Verification	IVA conducts random verification and field validation to ensure fairness	Periodically	Independent Verification Agent

A complainant may submit a grievance at any stage without fear of retaliation. Complaints may also be filed anonymously, although this may limit the ability to provide feedback to the complainant. Grievances that are found to fall outside the Project's scope will nonetheless be recorded and, where possible, referred to the appropriate institution or mechanism, with the complainant informed accordingly.

6.4.1 Grievance Resolution Steps detailed

The grievance resolution process outlined in **Error! Reference source not found.** is implemented through a structured and traceable system managed by the PIU. The eight steps operate as follows:

Step 1 – Uptake

Grievances may be submitted through multiple accessible channels, including Community Liaison Officers (CLOs), hotline, SMS/WhatsApp, email, website, written submissions, or grievance boxes. Complaints may be submitted anonymously. No grievance shall be rejected at intake stage.

Step 2 – Registration and Acknowledgment

Upon receipt, the PIU GM Focal Point records the grievance in the centralized Grievance Management Information System (GMIS). A unique tracking number is assigned, and acknowledgment is communicated to the complainant within two working days, unless the complaint is anonymous.

Step 3 – Screening and Categorization

The PIU GM Focal Point reviews the grievance to determine:

- The type of complaint (service delivery, land, labor, environmental, SEA/SH, fiduciary, etc.);
- The subproject or entity concerned;
- The level of urgency and potential risk;
- Whether the complaint falls within Project scope.

SEA/SH-related complaints are handled confidentially and in accordance with the Project's SEA/SH protocol, ensuring survivor-centered response and safe referral mechanisms. Labor-related grievances and fiduciary or integrity-related complaints will also be handled in accordance with their applicable procedures, where distinct from the standard community grievance process.

Step 4 – Referral

Based on categorization, the grievance is formally assigned through the GMIS to the appropriate responsible entity (DRE Company, Contractor, Fund Manager, Fiduciary Agent, Local Authority, or relevant PIU unit). The PIU retains oversight authority throughout the process.

Step 5 – Investigation and Resolution

The assigned entity investigates the complaint, consults relevant stakeholders as necessary, and proposes corrective actions consistent with Project standards, contractual obligations, and ESS requirements. A response must be submitted to the PIU within 10–15 working days. This timeframe applies to standard grievances; where a case is more

complex or requires additional review, the complainant will be informed accordingly and provided with updates on progress.

Step 6 – Verification of Resolution

The PIU contacts the complainant to confirm whether the proposed resolution is satisfactory. If the complainant agrees, the grievance proceeds to closure. If not, escalation mechanisms are activated.

Step 7 – Closure or Escalation

If resolved, the case is formally closed in the GMIS.

If unresolved or disputed, the grievance is escalated (see section 6.6)

At any stage, complainants may access the World Bank’s Grievance Redress Service (GRS). Complainants also retain the right to seek recourse through national judicial or administrative mechanisms at any stage, independently of the Project GM.

Step 8 – Independent Verification

The Independent Verification Agent (IVA) conducts periodic spot checks and field validation missions to verify that grievance handling procedures are followed and that resolutions are fair and properly documented.

Access to Judicial and External Remedies

Use of the Project’s Grievance Mechanism does not prevent complainants from seeking recourse through national judicial or administrative systems at any stage should they not be satisfied with the project GM. Further, complainants may also submit concerns to the World Bank’s Grievance Redress Service (GRS) in accordance with its procedures.

6.5. Special Protocols for SEA/SH and AML/CFT-Related Grievances

Certain categories of grievances require specific handling protocols to ensure confidentiality, survivor protection, and compliance with national and international safeguards. Two sensitive types of grievances fall under this category: cases related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and grievances related to financial integrity risks, including fraud, corruption, and Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT).

6.5.1. SEA/SH Grievances

SEA/SH-related grievances shall be handled under a survivor-centered approach, in accordance with the World Bank Good Practice Note on addressing SEA/SH in IPF involving major civil works, and the provisions of the Project SEA/SH action plan. These cases are managed through specialized procedures integrated within the Project’s Grievance Mechanism, with informed consent, minimum necessary data collection, safe and confidential referral. **Details are described below.**

Intake and Referral

The Project will ensure that multiple, confidential, and accessible reporting channels are available for SEA/SH-related grievances. These will include anonymous reporting options, community-level reporting through trained Community Liaison Officers, dedicated grievance forms and complaint boxes, project hotline, and submissions through accredited GBV service providers or third parties. SEA/SH complaints may also be lodged through contractor grievance mechanisms; however, all such cases must be promptly referred to the Project SEA/SH GM Focal Point for appropriate action.

Upon receipt of a SEA/SH complaint, the designated SEA/SH GM Focal Point or a trained Community Liaison Officer (CLO) acting as intake officer shall complete a confidential intake form. Only personnel trained in survivor-centered principles and confidentiality protocols may perform this function.

Before proceeding, the survivor's informed written consent shall be obtained. The intake officer shall document only essential information, limited to the survivor's account in their own words, age, and any potential project linkage. No detailed investigation shall be conducted at intake stage.

If the survivor is not yet connected to support services, immediate referral shall be facilitated, based on the survivor's preferences, to qualified medical, psychosocial, legal, security, or other survivor-identified service providers, in accordance with established referral pathways.

Case Management and Project Linkage Assessment

The GM Focal Point shall notify the PIU Social and GBV Specialist within twenty-four (24) hours of the SEA/SH grievance becoming known to the Project. The Specialist shall conduct a confidential case assessment within ten (10) days to determine potential project linkage and recommend appropriate administrative actions where relevant.

Final disciplinary measures remain the responsibility of employers, while criminal accountability rests with national judicial authorities.

Survivors shall be informed of case outcomes within fourteen (14) days, subject to confidentiality constraints, and retain the right to appeal through the PIU Grievance Committee. Survivors shall be provided with clear, accessible information on the grievance process, indicative timelines, available support services, and their right to decline participation or withdraw consent at any stage. Survivors retain full autonomy over their participation in the process and over any sharing of personal data.

Reporting and Escalation

The GM Focal Point shall acknowledge receipt of the complaint within three (3) working days. **SEA/SH incidents must be reported to the World Bank immediately when they become known to the Project, in line with ESIRT requirements.**

If the complaint is submitted through an accredited GBV service provider, communication with the survivor may be managed through that provider to ensure safety and confidentiality.

Confidentiality and Data Protection

All SEA/SH case information shall be stored separately from other grievance documentation, in a secure, lockable space or system, with strictly limited access. No personally identifiable information shall be entered into the GMIS; only anonymized case codes shall be used for tracking purposes. Access to case information shall be strictly limited on a need-to-know basis. Protection measures shall be activated immediately to prevent retaliation.

Institutional Safeguards and Prevention Measures

Community Liaison Officers and relevant GM personnel shall receive specialized training on:

- Survivor-centered engagement and active listening;
- Secure referral procedures;
- Confidential documentation and data protection.

Additional safeguards shall apply for cases involving children under 18, including the involvement of trained professionals specialized in child protection.

DRE companies and contractors shall sign and comply with the Project's SEA/SH Code of Conduct as part of contractual obligations.

6.5.2. AML/CFT, Fraud, and Corruption Grievances

Complaints related to financial misconduct, misuse of funds, bribery, extortion, or corruption are treated as integrity grievances.

Key provisions:

- These grievances are referred by the PIU to the Regional Fiduciary Agent and to the Liberia Anti-Corruption Commission (LACC) if appropriate.
- Complaints indicating possible money laundering or terrorist financing risks are referred to the Financial Intelligence Agency (FIA).
- Complainant identity is protected.
- Findings may be escalated to the World Bank Integrity Vice Presidency (INT) if serious.

These protocols complement the general grievance process and reinforce project accountability.

6.6. Grievance Escalation and Appeals Process

If a complainant is not satisfied with the proposed resolution at the initial handling level, the grievance may be escalated through a structured appeal mechanism. Escalation ensures impartial review and reinforces trust in the grievance process.

Table 14 : Level of escalation on the grievance mechanism

Escalation Level	Description	Responsibility
Level 1	Resolution attempted by responsible entity (e.g. DRE company, Fund Manager, contractor, or local authority) after referral from PIU	Responsible entity under PIU supervision
Level 2	Appeal to the PIU Grievance Committee for re-evaluation of the case	PIU Management and GM Focal Point
Level 3	Escalation to the Regional Coordination Unit (RCU) for independent review if dissatisfaction persists	RCU GM Coordinator
Level 4	Submission to World Bank Grievance Redress Service (GRS) as last resort	Complainant
National legal system	Complainants may seek recourse through the national legal system at anytime.	Complainant
Optional Path for Integrity Cases	Referral to WB Integrity Vice Presidency (INT) for fraud/corruption	PIU/RCU

6.6.1. Institutional Arrangements for Escalation and Appeals

The grievance escalation system operates through formally designated review bodies to ensure impartiality, procedural fairness, and accountability.

Level 2 – PIU Grievance Committee

A PIU Grievance Committee shall be established and formally designated by the Project Coordinator. The Committee shall include:

- The PIU Coordinator
- The Environmental Specialist;
- Social Specialist
- GBV/SEA/SH Specialist
- The GM Focal Point (Secretary, non-voting);
- A representative from the technical unit concerned (as needed).

The Committee shall review escalated grievances independently of the initial handling entity. Members directly involved in the first-level decision shall recuse themselves to prevent conflicts of interest.

The quorum for deliberation shall be at least three voting members, including the Chairperson or designated alternate. Decisions shall be taken by simple majority and formally recorded in meeting minutes.

The Committee shall issue a written determination within ten (10) working days of receiving the appeal.

Level 3 – Regional Coordination Unit (RCU)

If dissatisfaction persists, the grievance may be escalated to the Regional Coordination Unit (RCU). The RCU GM Coordinator shall conduct an independent review of the case file, assess procedural compliance, and determine whether corrective measures are warranted.

The RCU review shall be completed within fifteen (15) working days and communicated in writing to the complainant and the PIU.

Level 4 – World Bank GRS

Complainants may submit complaints directly to the World Bank’s Grievance Redress Service (GRS) at any time. Access to the GRS does not require prior exhaustion of project-level mechanisms.

Conflict of Interest and Safeguards

Any committee member with a potential conflict of interest shall recuse themselves from deliberations. All decisions shall be documented and archived within the GMIS to ensure traceability.

6.7. GM Documentation, Reporting, and Learning

To ensure transparency and accountability, all grievances received under the Liberia DARES Project will be documented and tracked in a secure digital Grievance Management Information System (GMIS) managed by the PIU. The GMIS enables real-time tracking of grievance status, category, responsible entity, resolution actions, and timelines. Grievances received through community-level channels, including those submitted orally through CLOs or local authorities, as well as grievances found to fall outside Project scope, will be recorded and tracked appropriately, including referral where relevant.

Documentation requirements:

- All grievances must be registered in GMIS, including those received orally through CLOs or local authorities.
- Each case is assigned a unique tracking number.
- Resolution actions and response dates are recorded.
- Evidence of communication with the complainant is stored.
- SEA/SH cases are coded anonymously and handled separately.
- Sensitive GM data is stored with restricted access.

Reporting:

- Monthly internal GM updates are prepared for PIU management.
- Quarterly GM reports are shared with the Ministry of Mines and Energy and the World Bank as part of environmental and social reporting.
- Semi-annual public summaries are disclosed in aggregated form without personal data and published on the RREA website and shared through other appropriate channels where needed to improve accessibility for stakeholders in rural and remote areas.
- Recurrent grievance trends are analyzed to strengthen mitigation measures and improve project performance. Complainant satisfaction will be assessed, where feasible and appropriate, through case follow-up and feedback at closure, while respecting confidentiality and the nature of the grievance.

Learning:

- The PIU will periodically review GM performance indicators such as resolution time, satisfaction rate, and number of escalated cases.
- Regular GM review meetings will be held with CLOs and partner entities to identify systemic issues.
- Lessons learned will inform stakeholder engagement planning and mid-term SEP adjustments.

6.8. Measures to Ensure GM Accessibility and Inclusion

The Grievance Mechanism will be designed and operated to ensure that all stakeholders, including those in remote or vulnerable situations, can access it without discrimination or barriers.

The following measures will be implemented:

Geographic accessibility

- Community-based grievance intake through CLOs deployed across counties and districts. and other designated local entry points, as applicable in project areas.
- Grievance boxes placed in accessible public locations such as community centers, health facilities, and schools.
- Mobile grievance support during PIU field missions to remote communities.

Cultural and social inclusion

- Engagement with traditional leaders to promote trust and acceptance of the GM.
- Dedicated awareness sessions for women's groups, youth, elders, and minority communities.
- Prevention of domination or influence by local elites over grievance submissions.

Linguistic accessibility

- GM information disclosed in English and translated verbally into local languages such as Mandingo, Kpelle, Bassa, Mano, Kru, Lorma and others.
- Use of radio in local languages to raise awareness of grievance channels and rights.

Literacy access

- Verbal grievance submission allowed through CLOs for illiterate complainants.
- Assistance provided to fill grievance forms without any fee.
- Simplified messages included in outreach materials.

Inclusion of vulnerable groups

- Dedicated grievance outreach conducted for vulnerable groups including persons with disabilities (PWDs), widows, internally displaced families, and poor rural households. and other vulnerable or disadvantaged groups identified in the relevant project area.
- Confidential reporting pathways ensured for SEA/SH and sensitive grievance cases.
- No requirement of documentation or legal representation to submit a grievance.

No retaliation and confidentiality

- All complainants are protected from retaliation or intimidation.
- Identity of complainants is kept confidential upon request.
- Anonymous grievances are accepted and addressed.
- Sensitive complaints will be handled through appropriate confidentiality and protection measures in line with the applicable grievance procedures.

6.9. Public Awareness and Disclosure of the Grievance Mechanism

For a grievance mechanism to be effective, stakeholders must be informed about its existence, purpose, procedures, and access channels. The Liberia DARES Project will actively promote awareness of the GM at national, county, and community levels throughout the project lifecycle. GM awareness and disclosure will be carried out through accessible, culturally appropriate, and locally relevant communication methods, including approaches suited to rural communities, low-literacy stakeholders, and vulnerable groups.

The Project Implementation Unit (PIU) will implement a GM communication plan to ensure that communities and other stakeholders are aware of their right to submit grievances. This will include:

Information disclosure methods

- Public announcements during community consultations and stakeholder meetings.
- Radio broadcasts in English and local languages explaining how to submit grievances.
- Distribution of posters, brochures, and grievance forms through local authorities and community structures.
- Posting of GM notices in public places such as town halls, schools, markets, and health centers.
- Publication of GM information on the RREA website and project information pages.
- Integration of GM information during contract signing and onboarding of DRE companies.
- Disclosure of GM information through relevant local channels and formats appropriate to the project area, including verbal communication where literacy barriers may exist.

Information to be disclosed

- Purpose of the GM and who can use it.
- Available grievance submission channels.
- Steps and timelines for grievance resolution.
- Rights of complainants, including confidentiality and non-retaliation.
- Special handling procedures for SEA/SH and fraud-related cases.
- Contact information for escalation to the World Bank GRS.
- Project-specific contact details, including hotline numbers, email address, web links, and physical submission points, once finalized.

Visibility commitments

- GM posters will be displayed in all project-affected communities before implementation begins.
- CLOs will be responsible for continuous awareness raising during field missions.
- Private operators engaged under the DARES Project will be required to display GM information at all work and service locations.
- Public disclosure and awareness materials will be updated, as needed, during implementation to reflect changes in contact details, uptake channels, or grievance procedures.

7. Monitoring and Reporting

Monitoring and reporting are essential to ensure that stakeholder engagement activities are implemented as planned, that grievances are addressed, and that lessons learned are integrated into project management. For the Liberia DARES Project, monitoring will operate at two complementary levels: (i) programmatic monitoring by institutional actors (National PIU, Fund Manager, IVA, RCU, Fiduciary Agent), and (ii) subproject-level monitoring conducted by private operators (DRE companies) using standardized checklists. This dual system ensures accountability at both macro and micro levels of project implementation.

Regular consultations will be held with women and girls in order to establish and then to help monitor the effectiveness of the GM procedures, including those specifically designed to address SEA/SH risks, and whether the GM is in fact accessible, safe, and adequate to address the needs and risks of women and other vulnerable social groups (persons with disabilities, minority groups, older persons, young persons and children, etc.). These consultations should not seek out or discuss personal experiences of violence or abuse of individual survivors but ask for overall feedback and suggestions for improvement.

7.1. Monitoring Objectives

The monitoring system aims to capture not only whether engagement is happening, but also whether it is effective, inclusive, and adaptive.

Objectives

- Track whether engagement activities are conducted by both national institutions and subproject operators.
- Assess inclusiveness, particularly regarding women, youth, and vulnerable groups.
- Verify that grievances are received, documented, and resolved and related systems accessible and effective.
- Ensure compliance of DRE companies with minimum engagement standards.
- Provide evidence-based feedback for adaptive management and learning.

The monitoring report during the planning and implementation phases will concentrate on the following areas:

- Engagement activities tracking all consultations and outreach efforts to take stakeholder inputs and feedback.
- Stakeholder feedback analysis categorizing input by type, location and source.
- Summary of grievance management monitoring, resolution, timelines and outcomes.
- Compliance assessment against SEP targets and indicators.
- Corrective actions documenting responsiveness to stakeholder concerns.
- Lessons learned identifying improvements for future engagement.

Monthly reports will capture routine interactions, while quarterly and annual reports will offer more detailed analyses. Monitoring reports will involve multiple data sources, including meeting documentation, grievance log summaries, feedback mechanisms, and field observations.

7.2. Roles and Responsibilities

Monitoring responsibilities are distributed across multiple levels to ensure internal accountability and independent oversight.

- **DRE Companies (Subproject Level):**
 - Complete the Stakeholder Engagement Checklist¹ during preparation and implementation of each subproject.
 - Maintain simple documentation (attendance lists, photos, meeting notes, proof of disclosure).
 - Submit the completed checklist and supporting documents to the National PIU.
- **National PIU (Liberia, hosted by RREA):**
 - Overall Coordination
 - Collection and verification of checklists and documentation from DRE companies.
 - Consolidates data into quarterly national reports and updating the GMIS.
 - Employs E&S Specialists and CLOs to verify local compliance.

¹ Proposed check list in annex 6

- Manage and implement the Stakeholder Engagement Plan (SEP)
- Dissemination of project information and implementation of effective GM.
- **Environmental Specialist and Social and GBV Specialist at PIU**
 - Provide technical support in engaging and addressing environmental concerns of stakeholders.
 - Coordinate and implement the SEP and GM (social).
 - Oversee the implementation of the SEA/SH Prevention and Response Action Plan to be developed as part of the environmental and social management framework (ESMF).
 - Dissemination of project and GM information.
 - Facilitate and monitor implementation of the SEP.
 - Incorporate SEP guidelines in contractors' agreement which includes but not limited to confidentiality, grievance redress mechanism and a defined reporting system.
 - Organize and conduct national and district level training.
 - Develop manuals and modules for capacity building and awareness creation.
 - Facilitate monitoring and coordinate monitoring activities.
 - Ensure provisions for gender inclusion and GM under the SEP is implemented effectively.
 - Interface with stakeholders and respond to comments or questions about the project or consultation process.
 - Provide contact information if stakeholders have questions or comments about the project or consultation process.
 - Document any interactions with external stakeholders.
 - Maintain database, consultation and feedback records for SEP.
 - Coordinate public meetings, workshops, focus groups, etc.
 - Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders.
 - Deliver information to stakeholders on complaint mechanism and procedures of the SEP.
 - Support SEA/SH case recording, management and referral (non-investigative role).
- **Fund Manager/Regional Coordination Unit (RCU):**
 - Reviews E&S checklists as part of the grant application process.
 - Ensures DRE companies meet stakeholder engagement requirements before financing.
 - Consolidates national reports into regional summaries.
 - Ensures harmonization of reporting formats across countries.
 - Submits semi-annual reports to the World Bank.
- **Independent Verification Agent (IVA)/Third Party Monitoring:**
 - Conducts spot checks on selected subprojects to verify authenticity of documentation.

- Ensures communities confirm that consultations and disclosure activities took place.
- Assesses the accessibility and effectiveness of project GM.

7.3. Summary of how SEP will be monitored and reported upon (including indicators)

Reporting will be structured to flow upward from subprojects to national and regional levels, ensuring both micro-level accountability and program-wide oversight.

- **DRE Companies:** submit checklists and documentation to the PIU after consultations and before project commissioning.
- **National PIU:** produces monthly and quarterly reports consolidating company submissions, GM performances summaries, and stakeholder engagement activities. and CLO field observations.
- **Fund Manager:** reports on compliance with stakeholder engagement requirements during grant review. prepares semi-annual consolidated reports covering all countries, including Liberia, for submission to the World Bank.
- **IVA:** issues independent verification notes on whether subproject engagement obligations have been met.
- **RCU:** prepares semi-annual consolidated reports covering all countries, including Liberia, for submission to the World Bank.
- **Public Disclosure:** Annual summaries (number of consultations, grievances, inclusion of vulnerable groups) published via RREA's website, radio, and local government offices.

7.3.1. Adaptive Management

The system is designed to be flexible and adaptive, allowing adjustments based on results and lessons learned.

- Annual update of the SEP incorporating monitoring results and stakeholder feedback.
- Corrective measures where engagement gaps are identified (e.g., if DRE companies fail to involve women/youth adequately).
- Continuous strengthening of capacity for both PIU staff and private operators through training and technical support.

7.3.2. Reporting back to stakeholder groups

The Project Implementation Unit (PIU) will ensure systematic feedback to stakeholders to maintain transparency, accountability, and trust throughout project implementation. Feedback will be provided using accessible and culturally appropriate channels, especially at the community level. Quarterly updates will be shared through community meetings, local radio programs, county notice boards, and public disclosure via the RREA website. Feedback loops will also be integrated into field missions conducted by Community Liaison Officers (CLOs), ensuring two-way communication with rural and remote communities.

In addition, the PIU will prepare annual public summaries that present aggregated information on stakeholder engagement activities, key issues raised by stakeholders, grievances received and resolved through the Grievance Mechanism (GM), and corrective actions implemented. These public summaries will not include personal data and will comply with confidentiality requirements, particularly for sensitive cases such as Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) or financial integrity complaints.

This reporting-back process will ensure that stakeholders are informed of how their concerns have been addressed and how their feedback has influenced project decisions. It strengthens stakeholder confidence and ensures compliance with the World Bank's Environmental and Social Standard ESS10 on information disclosure and ongoing stakeholder engagement.

7.3.3. Indicators

Monitoring indicators are used to track the implementation, effectiveness, and quality of stakeholder engagement activities at both program and subproject levels. These indicators support adaptive management by enabling the PIU, RCU, and other relevant entities to assess whether engagement activities are conducted as planned, whether stakeholders are meaningfully reached, and whether feedback and grievances are effectively addressed, in line with ESS10 requirements.

Indicators are structured at two levels: program-level indicators, which capture overall stakeholder engagement performance across the DARES Program, and subproject-level indicators, which focus on engagement activities implemented by DRE operators at the local level. All grievances related data must be segregated by gender

Program-Level Indicators (PIU, RCU, Fund Manager, IVA)

- Number of stakeholder consultations conducted at national and regional levels;
- Percentage of women, youth, and vulnerable or disadvantaged groups participating in consultations;
- Percentage of planned stakeholder engagement activities implemented as scheduled;
- Number of grievances received and resolved, disaggregated by type; and by Sex
- Percentage of grievances resolved within the timeframe defined in the Grievance Mechanism;
- Number of spot checks and verification missions conducted by the Independent Verification Agent (IVA);
- Number of financial or integrity-related grievances investigated by the Fiduciary Agent (as applicable);
- Number of SEP monitoring reports produced and disclosed (quarterly and annual);
- Number of corrective actions identified through monitoring and verification, and percentage of corrective actions effectively implemented.

Subproject-Level Indicators (DRE Operators, under PIU Oversight)

- Number of consultations conducted per subproject;
- Timeliness of disclosure of subproject information prior to construction or service rollout;
- Percentage of subprojects that submitted completed stakeholder engagement checklists and supporting documentation;
- Evidence of disclosure of tariffs and service conditions to users;
- Percentage of subprojects where vulnerable or disadvantaged groups were explicitly included in engagement activities;
- Percentage of subprojects with documented feedback matrices linking issues raised by stakeholders to responses or actions taken;
- Compliance rate with Grievance Mechanism awareness requirements (availability of hotline, contact information, and local entry points);
- Number of grievances received at subproject level and escalated to the PIU;
- Number of SEA/SH-related grievances managed in accordance with the Project referral and confidentiality procedures (reported in aggregated and non-identifiable form).

Monitoring data will be consolidated by the PIU through consultation logs, disclosure records, grievance databases, and verification reports. Results will be used to inform periodic SEP updates, strengthen implementation practices, and ensure continuous improvement of stakeholder engagement throughout the project lifecycle.

8. Budget for SEP Implementation

The SEP and GM budgets presented below are indicative estimates covering the full duration of the project. These figures will be reviewed and updated by the National PIU during project implementation.

Successful implementation of the SEP requires adequate financial resources. An indicative budget has been prepared to cover staffing, communication, consultations, and monitoring activities.

An indicative budget of approximately **USD 1,491,500** has been allocated for SEP implementation in Liberia, covering:

- Salaries of Social & GBV and Communications Specialists.
- Deployment of Community Liaison Officers.
- Organization of consultations and community meetings.
- Communication campaigns (radio, print, digital).
- Training for PIU and local stakeholders, including SEA/SH awareness. ESIRT and related process
- Operation of the Grievance Redress Mechanism (hotlines, GMIS, CLOs and national PIU focal points).
- Monitoring and reporting activities.

The budget will be refined during appraisal and integrated into the national PIU's annual work plans.

The effective implementation of this Stakeholder Engagement Plan (SEP) requires adequate financial resources to support continuous, inclusive, and meaningful engagement with stakeholders throughout the project lifecycle. The SEP budget includes costs for stakeholder consultations at national and local levels, communication and public information disclosure, capacity building, grievance redress management, and field-based coordination and monitoring. The budget also integrates measures to ensure accessibility for disadvantaged and vulnerable groups and reflects the project's commitment to transparency, accountability, and responsiveness in stakeholder engagement, in line with World Bank Environmental and Social Standard ESS10.

Resources will be managed by the Liberia Project Implementation Unit (PIU) hosted by the Rural and Renewable Energy Agency (RREA), under the oversight of the Ministry of Mines and Energy (MME). The budget will be refined during project appraisal and incorporated into the annual work plans of the PIU. It will be reviewed periodically and adjusted as necessary to ensure effective delivery of stakeholder engagement activities.

Table 15 : SEP implementation budget

Budget Category	Unit	Unit Cost (USD)	Quantity / Duration	Total (USD)	Remarks
1. Staffing and Management					
Social Development Specialist (PIU)	annual	43,200	5 years	180,000	Full-time
Project Coordinator	Annual	54,000	5 years	270,000	Full-time
Environmental Specialist	Annual	43,200	5 years	216,000	
GM Focal Point (PIU)	annual	28,000	5 years	140,000	Full-time
Communications & Outreach Officer	annual	24,000	5 years	120,000	GM & outreach
Community Liaison Officers (4 persons)	annual/person	6,000	4 × 5 years	120,000	County-based
Subtotal 1					USD 1,082,000
2. Stakeholder Consultations & Field Engagement					
Community consultations (logistics, transport, hall rental)	per mission	2,500	15 missions	37,500	Rural outreach
County-level stakeholder meetings	per event	3,000	10 events	30,000	Local coordination
National stakeholder workshop	per event	10,000	2	20,000	Launch + dissemination

Budget Category	Unit	Unit Cost (USD)	Quantity / Duration	Total (USD)	Remarks
Production of stakeholder materials	package	5,000	Annual × 5	25,000	Posters, forms, translations
Subtotal 2					112,500
3. Communication & GM Disclosure					
Radio awareness campaigns	campaign	2,500	10 campaigns	25,000	Local radio
Information brochures + flyers	package	2,000	5 years	10,000	Continuous communication
GM notice boards, sticker & signage	package	3,000	2	6,000	GM visibility
Website disclosure (RREA page)	annual	2,000	5 years	10,000	GM updates
Subtotal 3					51,000
4. Grievance Mechanism Operations					
GM hotline setup + phone operator	annual	5,000	5 years	25,000	Public access GM
SMS/WhatsApp GM platform	annual	2,000	5 years	10000	Alternative access
GMIS (KoboToolbox setup + tablets + data)	package	8,000	1	8,000	Case management system
Training for GM handling (PIU + CLOs)	sessions	4,000	3	12,000	Case classification
SEA/SH confidential management support Implementation of SEA/SH prevention and mitigation activities (training, awareness raising, GBV case management)	package	40000	2	80,000	Survivor referral system
AML/CFT compliance tools & screening	package	8,000	1	8,000	Integrity protocol
Subtotal 4					143,000
5. Monitoring, Reporting & Documentation					
Field monitoring missions	mission	2,500	10	25,000	GM follow-up
Independent evaluation of SEP (midterm)	contract	10,000	2	20,000	Learning
PIU reporting and	annual	3,000	5	15,000	GM database

Budget Category	Unit	Unit Cost (USD)	Quantity / Duration	Total (USD)	Remarks
documentation costs					
Subtotal 5					60,000
6. Training & Capacity-Building					
Training for local authorities (traditional + local govt)	sessions	4,000	4	16,000	GM awareness
Training DRE developers on GM requirements	sessions	5,000	3	15,000	Compliance
Training CSOs for accountability monitoring	sessions	3,000	4	12,000	Inclusion
Subtotal 6					43,000

**TOTAL ESTIMATED BUDGET
USD**

1,491,500

9. Annex

9.1. Annex 1 : National regulation

This annex presents the national legal and institutional framework applicable to the Liberia DARES Project and referenced throughout the Stakeholder Engagement Plan (SEP). It compiles the key laws, regulations, and institutional mandates governing transparency, environmental and social management, energy sector governance, land administration, grievance handling, and anti-corruption in Liberia. The inclusion of these references ensures alignment of the SEP with national legislation and supports compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS10 on Stakeholder Engagement and Information Disclosure.

No.	Reference	Description / Relevance	Official Source / Link
1	Freedom of Information Act (2010)	Guarantees public access to information and transparency obligations for public-interest projects.	https://www.icnl.org/research/library/liberia/foia2010/
2	Environmental Protection and Management Law (EPML, 2002)	Establishes the environmental legal framework of Liberia; mandates ESIA and public participation.	https://elaws.gov.lr/document/epml
3	Environmental Protection Agency Act (2003)	Creates the EPA as the national environmental regulator.	https://epa.gov.lr
4	Electricity Law of Liberia (2015)	Establishes power sector regulation and creates the Liberia Electricity Regulatory Commission (LERC).	https://leap.unep.org/countries/lr/national-legislation/electricity-law-liberia-2015
5	Rural and Renewable Energy Agency (RREA) Act (2015)	Establishes RREA as the rural electrification authority.	https://rrealiberia.org
6	Land Rights Act (2018)	Defines land tenure rights including Customary Land and Protected Areas.	https://www.lra.gov.lr/wp-content/uploads/2018/10/land-rights-act.pdf
7	Penal Code of Liberia	Penal provisions applicable to cases of corruption, extortion, GBV, SEA/SH.	https://ilo.org/dyn/natllex/docs/ELECTRONIC/93809/109503/F-1239864770/LBR93809.pdf
8	Public Health Law (Revised, 1976 & updates)	Governs health risk management and medical referral obligations (relevant for SEA/SH response).	https://moh.gov.lr
9	Liberia Anti-Corruption Commission (LACC) Act (Amended 2022)	Establishes prosecutorial authority for corruption-related offenses.	https://lacc.gov.lr
10	Financial Intelligence Agency (FIA) Act (2021)	Replaces FIU and establishes AML/CFT legal framework.	https://www.fialiberia.gov.lr
11	Public Procurement and Concessions Act (PPCA, 2010)	Governs procurement transparency and contract accountability.	https://ppcc.gov.lr

No.	Reference	Description / Relevance	Official Source / Link
12	Decentralization and Local Governance Act (2018)	Recognizes local government role in development and community engagement.	https://www.mia.gov.lr
13	Child Rights Act (2011)	Protects minors in project contexts (consultations, resettlement, GBV risk).	https://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=89211
14	National Gender Policy (2009)	Promotes gender inclusion and participation.	Ministry of Gender: https://www.mogcsp.gov.lr
15	Labor Practices Law of Liberia (2015 Amendment)	Covers labor rights, OHS, and contractor obligations.	https://www.ilo.org/dyn/natlex

9.2. Annex 2. Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual) with gender ratio	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
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9.3. Annex 3. Sample Table: Monitoring and Reporting on the SEP

Table 3A. Program-Level SEP Monitoring Indicators*(PIU, RCU, Fund Manager, IVA)*

Indicator	Definition / Measurement	Data Source	Reporting Frequency	Responsible Entity
Number of stakeholder consultations conducted at national and regional levels	Total number of consultations organized at national and regional levels during reporting period	Consultation logs; meeting minutes; attendance sheets	Quarterly	National PIU
Percentage of women, youth, and vulnerable groups participating in consultations	% of total participants disaggregated by sex, age group, and vulnerable category	Attendance sheets (sex-disaggregated); Kobo records	Quarterly	National PIU
Percentage of planned stakeholder engagement activities implemented as scheduled	(Number of engagement activities conducted ÷ number planned) × 100	SEP workplan tracking	Quarterly	National PIU
Number of grievances received and resolved (disaggregated by type and sex)	Total grievances logged in GMIS; breakdown by category and complainant sex	GMIS database	Quarterly	PIU GM Focal Point
Percentage of grievances resolved within defined timeframe	(Grievances resolved within timeframe ÷ total grievances resolved) × 100	GMIS tracking system	Quarterly	PIU GM Focal Point
Number of spot checks and verification missions conducted by IVA	Total stakeholder engagement-related verification missions conducted	IVA reports	Semi-annual	IVA
Number of financial/integrity-related grievances investigated	Total integrity-related cases referred to Fiduciary Agent or relevant authority	Fiduciary reports; GMIS	Quarterly	Fiduciary Agent / PIU
Number of SEP monitoring reports produced and disclosed	Quarterly and annual SEP implementation reports produced and publicly disclosed	PIU reports; website publication records	Quarterly / Annual	PIU
Number of corrective actions identified and % implemented	Total corrective measures identified; % implemented within agreed timeframe	Monitoring matrix; follow-up reports	Quarterly	PIU / RCU

Table 3B. Subproject-Level SEP Monitoring Indicators*(DRE Operators under PIU Oversight)*

Indicator	Definition / Measurement	Data Source	Reporting Frequency	Responsible Entity
Number of consultations conducted per subproject	Total number of community consultations organized per subproject	Subproject consultation records; checklist	Per subproject	DRE Operator
Timeliness of disclosure prior to construction/service rollout	Confirmation that key project information was disclosed before works or commissioning	Disclosure logs; subproject checklist	Per subproject	DRE Operator / PIU
Percentage of subprojects submitting completed stakeholder engagement checklists	$(\text{Subprojects submitting complete checklist} \div \text{total active subprojects}) \times 100$	PIU compliance tracking	Quarterly	PIU
Evidence of disclosure of tariffs and service conditions	Confirmation of documented tariff disclosure (meeting minutes, signed forms, public notice)	Disclosure records; IVA spot checks	Per subproject	DRE Operator
Percentage of subprojects including vulnerable groups in engagement	$(\text{Subprojects documenting targeted inclusion} \div \text{total subprojects}) \times 100$	Attendance sheets; consultation reports	Quarterly	PIU
Percentage of subprojects with documented feedback matrices	$(\text{Subprojects with issue-response matrix} \div \text{total subprojects}) \times 100$	Subproject reports; checklist	Quarterly	PIU
Compliance rate with GM awareness requirements	% of subprojects where hotline/contact details visibly available and communicated	Field verification; IVA spot checks	Quarterly	PIU / IVA
Number of grievances received at subproject level and escalated to PIU	Total grievances logged locally and referred upward	GMIS records	Quarterly	DRE Operator / PIU
Number of SEA/SH grievances managed per protocol (aggregated)	Number of SEA/SH cases referred and handled in line with referral and confidentiality procedures (no PII)	SEA/SH referral log (anonymized)	Quarterly	PIU SEA/SH Focal Point

9.4. Annex 4 : Minutes of the first phase consultation

Stakeholder consultation session: Liberia LERC & RREA – 2nd June 2025

Attendees: Mohammad Saqib (World Bank), Minnie Paegar- Kallon (LERC), Steven Payma (RREA), Theophilus A T Kambo Jr (RREA), additional LERC staff, Flora Erbel (INENSUS), Jakob Schmidt-Reindahl (INENSUS), Diego Perez (INENSUS), Andrea Cabanero (INENSUS)

1. Objective of the Meeting

- To exchange on regulatory change recommendations for harmonizing Liberia’s legal framework with other Regional DARES (R-DARES) countries.
- Discuss specific regulatory clarifications needed for implementation.
- Confirm government support for regional procurement and private-sector-led approaches.

2. Liberia’s Electrification Strategy

- Liberia aims for universal electricity access by 2030, currently at ~33% access.
- Mission 300 targets 75% access by 2030 via:
 - 15,000 mini-grid connections annually (2025–2030).
 - 93,000 total mini-grid connections planned.
- Emphasis on integrated least-cost planning and public-private partnerships (PPPs).

3. Key Challenges Identified

- Delays and cost overruns due to:
 - Lack of project preparation.
 - Bureaucratic hurdles in approvals.
 - Inadequate long-term O&M frameworks for mini-grids.
- Need for innovative financing/delivery models and streamlined regulations.

4. Private Sector Role and Procurement

- Liberia supports performance-based grant (PBG) models with private developers selecting sites and owning assets.
- Regional procurement (including company procurement and fund management) is supported by Liberia and confirmed by its participation in the Freetown workshop.

5. Electrification of Public Institutions

- Systems remain in private ownership, with service contracts (not kWh sales) to public institutions.
- Contracts based on KPIs for service reliability rather than energy sales.

- Support from Liberia for this model was confirmed; seen as a way to ensure O&M sustainability.

6. Licensing and Regulatory Clarifications of EaaS model

- Standalone solar systems <100 kWp: only registration required if not selling electricity.
- Systems between 10–100 kWp: ambiguity on whether licensing is required under Energy-as-a-Service (EaaS) contracts.
- Regulator (LERC) indicated the provision of power is a regulated activity regardless of sales model.
- Further internal discussion is needed to decide if such systems can be exempted from generation license to reduce administrative burden.
- Systems <10 kWp: no registration needed.

7. Tax Exemptions

- Solar and PUE components are eligible for tax exemption through annual Executive Orders, not permanent law.
- Applies to solar-powered components including inverters, batteries, meters, etc., that meet minimum standards.

8. Regulator's Status

- The Liberia Electricity Regulatory Commission (LERC) is now independent (no longer hosted by the Ministry of Energy). "Transition phase" mentioned in the law is closed.

9. Construction Permits – Liberia-Specific Issue

- Liberia is the only R-DARES country requiring construction permits before issuing licenses.
- This affects private sector risk and project timelines.
- Recommended to reform the process to allow licensing before construction.

10. Next Steps

- LERC to internally review the regulatory change recommendations.
- A follow-up meeting will be scheduled to:
 - Discuss the recommendations in more detail.
 - Address LERC's responses and feedback.
 - Potentially propose additional changes (e.g., exemption for EaaS models).

Meeting Minutes – R-DARES Liberia Legal Framework Consultation

Date: 4 July 2025

Time: 10:37 AM – 11:36 AM (WAT)

Duration: 59 minutes

Participants: Andrea Cabañero, Minnie Paegar-Kallon, Abu Dekontee Sanso, Ferdous Rahman, Abhishek Malhotra, Nico Peterschmidt, Steven Payma, Flora Erbel, and others

1. Licensing Process and Construction Permit

- Issue: Current legal framework requires a construction permit before licence issuance, and licence is only granted after commissioning, creating high investment risk.
- Agreed Resolution:
 - A licence can be issued upon receipt of the construction permit.
 - The licence will cover the construction phase and be extended to the operational phase after successful commissioning.
 - Extension is not a new licence but a continuation, with minimal administrative burden (no new fees or extensive paperwork).
 - Commissioning report is a precondition for licence extension.
 - Quality assurance framework or clear annexes/templates for commissioning reports should be considered for transparency.
 - It was agreed that referencing the grid code for commissioning templates is preferred over adding a new annex.

2. Tariff Regulation and Licensing Thresholds

- Issue: Current framework exempts micro-utility permits (up to 1 MW) from formal tariff regulation, which could exclude cost-reflective tariffs for significant projects (e.g. 800 kW).
- Clarification:
 - Developers can opt for a licence instead of a permit to access tariff regulation benefits.
 - Tariff regulation applies to licenses, not permits.
 - Project aggregation is applied—licensing is based on total portfolio capacity.
 - Decision: No change needed to regulation, but this interpretation should be clearly communicated to developers in Operations Guidelines being prepared as part of R-DARES.

3. Small Systems (<100 kW) and Retail Sales

- Issue: Ambiguity in treatment of systems under 100 kW selling electricity to third parties.
- Clarification:
 - Systems under 100 kW not selling power only require registration.
 - If power is sold (retail), licensing or permitting is required, even if <100 kW.
 - Current table in Schedule 2 does not reflect this.
- Agreed Change:
 - Amend Schedule 2 of the MULR to reflect that systems between 10–100 kW, if retailing electricity, require a small permit.

- This will ensure regulatory clarity for small commercial systems.

4. Stabilisation Clause

- Purpose: To protect investors against future regulatory or legal changes that affect project profitability.
- Clarification:
 - This clause is distinct from the compensation clause related to grid arrival.
 - Its inclusion in the licence terms and conditions, not in the regulation, is key to enabling MIGA guarantees.
 - All parties agreed to include this in the licence agreement's terms and conditions.

5. Follow-Up Points

- A tentative follow-up meeting is proposed for Friday, 18 July 2025, subject to confirmation.
- Action items:
 - Share meeting minutes and revised tables/comments.
 - Review application forms and licence templates for consistency with changes.

7. Additional Topics (Not Concluded)

- Energy City Tariff Discussion:
 - Concerns were raised about a recently approved high tariff (\$0.45/kWh) and its political implications.
 - Deferred for separate, more in-depth discussion.

Meeting Title: R-DARES Liberia – Legal Framework Consultation

Date: 18 July 2025

Time: 10:38 AM – 11:30 AM

Location: Online

Facilitator: Andrea Cabañero (R-DARES Team)

Participants:

- Ferdous Rahman (R-DARES)
 - Alieu Fuad Nyei (LERC)
 - Atty. Steve Joe-joe (LERC)
 - Abu Dekontee Sanso (LERC)
 - Steven Payma (RREA / Ministry of Finance)
 - Minnie Paegar-Kallon (LERC)
 - Samuel Sebbowa Bunnya (INENSUS)
 - Onyinyechukwu Ngozichukwu Anene-Nzelu (World Bank)
 - Andrea Cabañero (R-DARES)
-

1. Stabilisation Clause

- **Key point:** The stabilisation clause should be included in licensing terms only for DRE financing projects.
 - **Update:** MIGA clarified that for the EaaS component, protection will be embedded in service contracts and the stabilisation clause in licenses is not necessary, but to be included instead in the energy service contracts.
 - **Action:** The clause is still required for DRE projects and must follow MIGA’s drafting format.
-

2. Grant Agreement and Licensing Prior to Financial Close

- **Issue:** Licensing application forms require equity and debt funding evidence before financial close, which may deter financing.
 - **Agreement:** Add “(if available)” next to funding sources in the licensing forms to reflect flexibility.
 - **Action:** R-DARES will update and share the document with proposed changes.
-

3. Energy-as-a-Service (EaaS) Exemption from Licensing

- **Clarification:** EaaS systems under 100 kW not selling kWh but providing service via KPIs qualify under the registration regime.
 - **Debate:** Whether to use the generic term “power access service” instead of “energy-as-a-service.”
 - **Conclusion:** The term “energy-as-a-service” is widely recognized and will be retained in the regulations for clarity.
-

4. Tariff Revision Flexibility

- **Current provision:** Emergency tariff revision allowed in case of financial emergency (Reg. 15.1).
 - **Clarification:** Minor revisions are allowed annually.
 - **Conclusion:** Current provisions in the regulations (minor annual reviews and emergency revisions) are sufficient. No additional clause needed for “trigger by customers.”
-

5. Currency and Exchange Rate

- **Update:** Tariffs are set in USD; payments are converted at prevailing exchange rates. This reduces currency risk for operators.
-

6. Fiscal Incentives via Executive Orders

- **Discussion:** Liberia has a precedent of issuing Executive Orders for duty exemptions on solar equipment.
 - **Update:** A fiscal impact model exists for renewing Executive Orders annually until 2030.
 - **Conclusion:** This tool can support continued exemption policies to support SDG 7 and Mission 300.
-

7. Depreciation Methodology

- **R-DARES Proposal:** Consider annuity depreciation to lower early-year tariffs and boost affordability and demand.
 - **LERC Position:** Maintain straight-line depreciation for now due to simplicity and policy alignment.
 - **World Bank Position:** CapEx subsidies reduce initial costs, but no direct demand-side subsidies planned.
 - **Conclusion:** Regulation will retain straight-line depreciation. Changes may be considered in the future, requiring a regulatory amendment.
-

8. Next Steps

- R-DARES will send two versions of the draft: one with tracked changes, and one clean version.
- LERC will engage stakeholders (private sector) for consultation on proposed amendments.
- After validation, LERC will proceed with formal regulatory updates.
- R-DARES to follow up in late August regarding implementation arrangements.

9.5. Annex 5. Stakeholder Mapping Matrix

Stakeholder Group	Interest	Influence	Key Concerns/Expectations	Engagement Approach	Responsible Entity
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9.6. Annex 6. Consultation Log (KoboToolbox Form)

Digital form fields:

- date,
- location,
- type,
- participants (sex/age/vulnerability),
- topics,
- feedback,
- actions,
- evidence (minutes/photos/audio).

9.7. Annex 7. Subproject Stakeholder Engagement Checklist (KoboToolbox Form)

Required of all DRE companies prior to commissioning; includes evidence of consultation, disclosure (tariffs/GM), inclusion of vulnerable groups, and submission to PIU.

(Structured by Consultation Phases)

SECTION A – Subproject Identification

- Subproject Name:
- Location:DRE/EaaS Operator:
- CLO Responsible:
- Date of Commissioning / Service Rollout:

SECTION B – Phase 1: Initial Consultation (Pre-Construction)

Date of Consultation: ____

Purpose Confirmed:

- Inform community about proposed activities
- Present site/location
- Present implementation timeline
- Present expected benefits
- Explain potential impacts

Documentation Attached:

- Attendance list (sex-disaggregated)
- Photos
- Minutes
- Issues raised recorded

Participation Data:

- Total Participants: ___
- Women: ___
- Youth: ___
- Vulnerable Groups: ___

SECTION C – Phase 2: Follow-Up Consultation (Commitments & Mitigation)

Date of Consultation: ___

Purpose Confirmed:

- Discuss mitigation measures
- Present safety measures
- Explain tariff structure
- Clarify service conditions
- Address concerns from Phase 1

Documentation Attached:

- Attendance list
- Feedback matrix attached
- Responses to concerns documented

Was this consultation conducted before commissioning?

Yes No

SECTION D – Disclosure Compliance

Date of Public Disclosure: ___

- Tariffs publicly disclosed
- Service conditions explained
- Safety messages communicated
- GM contact details shared
- Hotline publicly displayed

Format used:

- Public meeting
- Printed material
- Radio
- Door-to-door

SECTION E – Grievance Mechanism Operationalization

- Local GM entry point identified
- Complaint box installed (if applicable)
- CLO trained on GM procedures
- GM awareness explained during consultation

Grievance Data (Preparation Phase):

- Number received: __
- Number resolved locally: __
- Number escalated to PIU: __
- Number of SEA/SH cases (aggregated only): __

SECTION F – Compliance and Verification

Were both required consultations conducted?

Yes No

Was engagement completed prior to commissioning?

Yes No

Has feedback been formally documented?

Yes No

Signature of DRE Representative:

Signature of CLO:

Date:

PIU Verification:

Complete

Incomplete (Corrective action required)

9.8. Annex 8. Grievance Mechanism Forms and Registry Templates

Complaint ID	Date Received	Source/Channel	Category	Responsible Entity	Status	Resolution Provided	Complainant Satisfied?	Date Closed