



---

**Liberia-SEP-WARDIP-Dec 2025**

---

FOR THE

**WESTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT (WARDIP)-SOP2  
(P500628)**



**THE REPUBLIC OF LIBERIA**



**MINISTRY OF POST AND TELECOMMUNICATION**

**Stakeholder Engagement Plan**

# **DRAFT**

# **STAKEHOLDER ENGAGEMENT PLAN**

**December 2025**

# **TABLE OF CONTENTS**

|   |           |
|---|-----------|
| <b>LIST OF TABLES</b>   | <b>v</b>  |
| <b>LIST OF FIGURES</b>  | <b>v</b>  |
| <b>ACRONYMS AND ABBREVIATIONS</b>   | <b>v</b>  |
| <b>1.0 INTRODUCTION</b>   | <b>1</b>  |
| 1.1 Background  | 1         |
| 1.2 Program Development Objective and Components                            | 1         |
| 1.3 Project intervention zone   | 2         |
| 1.4 Project Beneficiaries   | 3         |
| 1.5 Potential Environmental and Social Risks and Impacts                    | 4         |
| 1.6 Need for the Stakeholder Engagement Plan                                | 5         |
| 1.7 Objectives of the Stakeholder Engagement Plan (SEP)                     | 5         |
| <b>2.0 REGULATORY REQUIREMENTS</b>  | <b>6</b>  |
| <b>2.1 National Policies, Laws and Regulations</b>                          | <b>6</b>  |
| 2.2 World Bank Policies and Environmental and Social Standards              | 7         |
| <b>3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS</b>                          | <b>7</b>  |
| 3.1 Methodology for Preparation of the SEP                                  | 8         |
| 3.2 Stakeholder Identification  | 10        |
| 3.3 Stakeholder Categorization  | 10        |
| 3.4 Key Project Partners and Roles  | 15        |
| 3.5 Stakeholder Analysis  | 15        |
| <b>4.0 Stakeholder Engagement Program</b>                                   | <b>22</b> |
| 4.1 Summary of stakeholder engagement done during project preparation       | 22        |
| 4.2 Proposed Project Strategy for Stakeholder Engagement                    | 27        |
| 4.3 Proposed Strategy for Engagement of Disadvantaged and Vulnerable Groups | 27        |
| 4.4 Stakeholder Engagement Plan   | 28        |
| 4.5 Information Disclosure Strategy   | 35        |
| 4.6 Targeted Engagement of Special Groups                                   | 38        |

|            |   |           |
|------------|---|-----------|
| 4.7        | Communication Strategy  | 39        |
| 4.8        | Proposed Strategy for Information Disclosure  | 40        |
| 4.9        | Reporting back to stakeholders  | 40        |
| 4.10       | Resources and responsibilities for implementing stakeholder engagement activities   | 40        |
| <b>5.0</b> | <b>GRIEVANCE MECHANISM</b>  | <b>42</b> |
| 5.1        | Objectives of Project Grievance Redressal Mechanism (GRM)   | 42        |
| 5.2        | Guiding Principles  | 42        |
| 5.3        | Elements of the GRM   | 42        |
| 5.4        | Levels of the Grievance Mechanism   | 43        |
| 5.5        | Grievance Management Procedures   | 44        |
| 5.6        | General Complaints Handling Process   | 45        |
| 5.8        | Workers' Grievance Mechanism  | 49        |
| 5.9        | World Bank's Grievance Redress Service  | 50        |
| 5.10       | Sexual Exploitation, Abuse and Harassment (SEAH), Gender- Based Violence (GBV) and Violence Against Children (VAC) Grievance Management | 50        |
| <b>6.0</b> | <b>MONITORING AND REPORTING ON SEP</b>  | <b>53</b> |
| 6.1        | Reporting Framework   | 56        |
| 6.2        | Involvement of Stakeholders in Monitoring Activities  | 57        |
| 6.3        | Reporting Back to Stakeholder Groups  | 57        |
| <b>7.0</b> | <b>MANAGEMENT OF STAKEHOLDER ENGAGEMENT PLAN</b>  | <b>57</b> |
|            | <b>ANNEXURES</b>  | <b>60</b> |
|            | Annex 1: Stakeholder Engaged  | 60        |
|            | Annex 2: Consultation Questionnaire Template  | 63        |
|            | Annex 5: Grievance Mechanism Complaint Form (not for SEAH/GBV/VAC cases)  | 66        |
|            | Annex 2: Grievance Register/Log   | 68        |
|            | Annex 3: Grievance Screening and Investigation Sheet  | 69        |
|            | Annex 4: SEP General Evaluation Form  | 71        |
|            | Annex 5: Training Feedback Form   | 72        |



## LIST OF TABLES

|  |    |
|--|----|
| Table 3-1: Key Project Affected Parties (including some of the most vulnerable and disadvantaged groups) | 11 |
| Table 3-2: List of Other Interested Parties and their Role/ Mandate                                      | 12 |
| Table 3-3: Potential Interests and Concerns of Different Disadvantaged and/or Vulnerable Groups          | 14 |
| Table 3-4: Key Partners and Roles  | 15 |
| Table 3-5: Level of Impact on Project Stakeholders   | 16 |
| Table 3-6: Assessment of Stakeholders' Interest in and Potential Roles in Meeting Project Outcomes       | 18 |
| Table 3-7: Analysis of Stakeholder Interests and Influence   | 21 |
| Table 4-1: Details of Stakeholder Consultations Conducted  | 23 |
| Table 4-2: Stakeholders Feedback   | 25 |
| Table 4-3: Stakeholder Engagement Plan   | 31 |
| Table 4-4: Information Disclosure Strategy   | 36 |
| Table 4-5: SEP Estimated Budget  | 41 |
| Table 5-1: Grievance Redress Structure   | 44 |
| Table 5-2: Category of Grievance   | 48 |
| Table 5-3: Categorization of Grievances - Risk-Urgency Scores  | 49 |
| Table 5-4: Outline of Response Timelines   | 50 |
| Table 6-1: Reporting on Stakeholder Engagement Indicators  | 56 |
| Table 7-1: Roles and Responsibilities of Stakeholder   | 58 |

## LIST OF FIGURES

|  |    |
|--|----|
| Figure 1: Map of Liberia Showing Counties and Major Cities | 3  |
| Figure 2: Stages in GRM case handling                      | 45 |
| Figure 3: GRM Channels                                     | 46 |
| Figure 4: Complaints Register Requirements                 | 47 |

## ACRONYMS AND ABBREVIATIONS

|        |   |
|--------|---|
| AFW    | Africa West   |
| ANIP   | Agence Nationale pour l'Identification des Personnes (National Agency for the Identification of Persons in Benin) |
| CERC   | Contingent Emergency Response Component   |
| ECOWAS | Economic Community of West African States   |
| EIB    | European Investment Bank  |
| ESCP   | Environmental and Social Commitment Plan  |
| ESIA   | Environmental and Social Impact Assessment  |
| ESMF   | Environmental and Social Management Framework   |
| ESMP   | Environmental and Social Management Plan  |
| ESMS   | Environmental and Social Management System  |
| ESRS   | Environmental and Social Review Summary   |
| EU     | European Union  |
| FAGACE | African Guarantee and Economic Cooperation Fund   |
| GBV    | Gender-Based Violence   |
| GRS    | Grievance Redress Service   |
| IDA    | International Development Association   |
| IFC    | International Finance Corporation   |
| LMP    | Labor Management Procedures   |
| LRREN  | Liberia Research and Education Network  |
| M&E    | Monitoring and Evaluation   |
| MDAs   | Ministries, Departments, and Agencies   |
| MoPT   | Ministry of Post and Telecommunications   |
| PCM    | Private Capital Mobilization  |
| PDO    | Project Development Objective   |
| PIU    | Project Implementation Unit   |
| PSC    | Project Steering Committee  |
| PSW    | Private Sector Window   |
| PTC    | Project Technical Committee   |
| PWD    | People With Disabilities  |
| SDM    | Single Digital Market   |
| SEAH   | Sexual Exploitation, Abuse and Harassment   |
| SEP    | Stakeholder Engagement Plan   |
| SOP    | Series of Projects  |
| VAC    | Violence Against Children   |
| WAEMU  | West African Economic and Monetary Union  |
| WACS   | West Africa Cable System  |
| WACREN | Western and Central Africa Research and Education Network   |
| WARCIP | West Africa Regional Communications Infrastructure Project  |
| WB     | World Bank  |
| WURI   | West Africa Unique Identification for Regional Integration and Inclusion  |

## 1.0 INTRODUCTION

---

### 1.1 Background

Liberia, with a population of about 5.5 million and a GNI per capita of US\$730 (2023), remains one of the smallest and poorest economies in West Africa. More than half of its population is under 25 years old, and the country faces persistent development challenges, including high unemployment (around one-third of youth) and widespread poverty (two-thirds of the population). Liberia's Human Capital Index of 0.36 ranks among the lowest globally. The two civil wars (1989–1997 and 1999–2003) devastated infrastructure and institutions, setting back development.

Liberia is also highly vulnerable to climate change, ranking 177th out of 185 countries on the Notre Dame Gain Index, with women and girls disproportionately affected by war and economic hardship. Key development constraints include weak connectivity, data, and online markets.

To address these challenges, under the West Africa Regional Digital Integration Program (WARDIP-SOP2), Liberia has secured a US\$50 million facility from the World Bank. The project aims to expand broadband access, strengthen digital services, and integrate Liberia into the regional digital economy. It seeks to create an enabling environment for digital skills, innovation, and competitiveness, advancing national and regional digital transformation goals. The Ministry of Posts and Telecommunications will lead implementation across selected local government areas.

### 1.2 Program Development Objective and Components

The project development objectives (PDO) will be realized through the following result level channels and indicators:

- (a) Increase broadband access and usage
  - People using broadband internet (new use with key consideration to women)
  - Used international bandwidth per mobile internet user (Kbit/s per person)
- (b) Promote the establishment of a single digital market in Western Africa
  - Cross-border digital transactions (number)
  - Public digital services developed/reengineered for regional integration (number)

The proposed project components to be implemented in the Republic of Liberia are:

#### **Component 1: Building Policy and Financing Pathways for West African SDM**

This component supports WAEMU's vision of a Single Digital Market (SDM) by 2030, focusing on policy development, capacity building, and private capital mobilization. It includes:

- Subcomponent 1.1: Establishes WAEMU's Digital Economy Program Implementation Unit and supports legal reforms for digital public services.
- Subcomponent 1.2: Delivers training on digital policy, cybersecurity, AI, and gender inclusion in digital markets.
- Subcomponent 1.3: Launches a regional guarantee facility managed by FAGACE to issue Digital Bonds, attracting \$500M in private financing for digital infrastructure and services.

#### **Component 2: Connectivity Market Development and Integration**

This component enhances regional broadband connectivity and infrastructure resilience through public-private partnerships. It includes:

- Subcomponent 2.1: Strengthens legal and regulatory frameworks in Benin and Liberia, including spectrum policy and internet governance.
- Subcomponent 2.2: Supports submarine cable systems and landing stations in Benin, Liberia, and Sierra Leone, with climate-resilient and energy-efficient designs. Also strengthens NRENS and explores alternative connectivity routes using existing infrastructure.

### **Component 3: Data Market Development and Integration**

This component promotes secure cross-border data flows and AI adoption. It includes:

- Subcomponent 3.1: Builds cybersecurity and data protection capacity, including CSIRTs, CIIP, and awareness campaigns.
- Subcomponent 3.2: Develops sovereign multi-cloud infrastructure, electronic trust services, and AI pilots in Benin and Liberia, with a focus on sustainability and inclusion.

### **Component 4: Online Market Development and Integration**

This component boosts digital entrepreneurship, financial inclusion, and e-commerce. It includes:

- Subcomponent 4.1: Provides digital skills training and early-stage financing for startups, with a focus on women and underserved groups.
- Subcomponent 4.2: Expands digital payment infrastructure and agent networks, and strengthens institutional capacity.
- Subcomponent 4.3: Supports legal reforms for digital trade and e-commerce, including digital address systems and sector-specific platforms like e-agriculture.

### **Component 5: Project Management and Implementation Support**

This component strengthens PIU capacity for project execution, monitoring, and compliance. It includes support for audits, citizen engagement, grievance redress mechanisms, and environmental and social safeguards.

### **Component 6: Contingent Emergency Response Component (CERC)**

This component allows rapid reallocation of project funds in response to emergencies. Activation requires a CERC Manual, Emergency Action Plan, and compliance with environmental and social safeguards.

## **1.3 Project intervention zone**

The Republic of Liberia is situated at latitudes 4°21' N and 8°33' N of the equator and longitudes 11°28' W and 7°32' W. Liberia covers an area of 111,369 km<sup>2</sup> and is entirely within the humid Upper Guinean Forest Ecosystem in West Africa, along the Atlantic Coast. The area of Liberia's Exclusive Economic Zone (EEZ) is 229,700 km<sup>2</sup>, extending 370.4 km (200 nautical miles) seaward from the shore. Liberia lies along the Atlantic Coast of West Africa, bordered by Sierra Leone, Côte d'Ivoire, and Guinea. It has a tropical climate with distinct rainy and dry seasons. It has 4.2 million hectares of forested land, facing significant deforestation and logging issues. The 560 km coastline features mangrove swamps, lagoons, sandy beaches, and estuaries, which support diverse flora and fauna.

The country is divided into 15 administrative counties with a population of approximately 5.5 million, comprising mainly indigenous ethnic groups. The capital, and by far the largest town, is Monrovia, located in Montserrado County, with a population exceeding one million. The remainder of the country is primarily agricultural or forested, with other major towns exhibiting diverse population

numbers. Specific locations and other configurations relative to the project will emerge as initial processes are ongoing. The economy is largely agrarian, with foreign investment in rubber, forestry, and mining. The country faces high unemployment and poverty rates, though extreme poverty has slightly decreased recently.



Figure 1: Map of Liberia Showing Counties and Major Cities

1.4 Project Beneficiaries

The project will benefit individuals, businesses, and public sector entities - Ministries, Departments, and Agencies (MDAs), as well as more broadly across the West African region through WAEMU and FAGACE. It aims to improve access to connectivity and foster an enabling environment for digital entrepreneurship, e-services (including access to finance), and skills development.

- a. **Individuals** will benefit from improved broadband access and participation in an expanding regional digital market. By project closing, at least 5 million people across the three countries are expected to gain new or better broadband connectivity. A further 26,000 individuals—at least half women—will participate in targeted digital skills programs designed around market demand in areas such as digital literacy, service delivery, e-commerce, data management, and cybersecurity. These will be delivered in partnership with universities, training providers, and private sector initiatives, with emphasis on employability and workforce readiness.
- b. **Businesses** will benefit from lower transaction costs, expanded market access, and improved financing opportunities. Through reforms to enabling the environment and investment in infrastructure, the project will support at least 500 firms—including fintechs, SMEs, and digital service providers—via competitively awarded contracts,

advisory services, and investment facilitation. Broader spillovers are expected through adoption of digital payments, cloud-based tools, and online platforms, enhancing productivity and competitiveness across value chains.

- c. **Public sector institutions**, including ministries, regulatory agencies, universities, technical and vocational education and training (TVET) institutions— will receive technical assistance and capacity-building. Approximately 30,000 officials (40% women) will benefit from training to strengthen regulatory effectiveness, digital governance, and service delivery. Connectivity upgrades for research and education institutions through National Research and Education Networks (NRENs) will enable high-speed access to learning resources and cross-border collaboration. In Sierra Leone, specific support will focus on securing resilient international connectivity through a second submarine cable and strengthening regulatory oversight to ensure affordable, open-access arrangements that benefit households, businesses, and public institutions alike.
- d. **Regional institutions** such as WAEMU, FAGACE, and capital market regulators will receive technical and financial support to strengthen their ability to mobilize financing for digital transformation, including through digital bond issuance and credit enhancement instruments.

## 1.5 Potential Environmental and Social Risks and Impacts

Various environmental and social risks are associated with SOP2, with some stakeholders more vulnerable to facing higher impacts due to intersecting vulnerabilities, exclusion, low bargaining power, access and (technology) adaptation ability, and unfavorable geographic or social location and conditions. Some of these have been mapped through the preliminary E&S assessment conducted by the MOPT in August 20205 and include:

### 1.5.1 Environmental Risks

- Marine and coastal environment disturbance
- Coastal erosion & habitat alteration
- Noise, dust & air pollution
- Disruption of fishing livelihoods
- Risk of pollution of the water bodies
- Land use conflict & community tension
- Risk of loss of land and other assets or restriction of access to livelihood
- Waste management & pollution risks (increase in e-waste generation)
- Health and safety risks (e.g., occupational health and safety risks like body injuries and fatalities from the use of excavators, trucks, bulldozers, graders, rollers and water trucks. Etc. on the construction sites and risk of Communicable Diseases including COVID-19, sexually transmitted diseases (STDs) and sexually transmitted infections (STI).

### 1.5.2 Social Risks

- Disruption of fishing livelihoods
- Land use conflict and resettlement risks
- Community tension & social cohesion risks
- Health and safety concerns
- Urbanization pressures & social change
- Risk of destruction of Cultural Heritage/ Archaeological resources
- Risks of Sexual Exploitation, Abuse and Harassment (SEAH), gender-based violence (GBV) and gender discrimination during the implementation and operational phase

- Labor risks related to discriminatory and non-transparent recruitment, compensation, and management of workers and other labor-related grievances as well as the risks of child labor.
- Risks discrimination in the selection of female participation in the ICT training program
- Social Exclusion Risks (risk of exclusion of vulnerable and disadvantaged groups and individuals and inequitable distribution of project benefits).

### **1.6 Need for the Stakeholder Engagement Plan**

World Bank ESS10 is relevant to the project as meaningful stakeholder engagement is critical for identifying, assessing, and managing the environmental and social risks associated with digital infrastructure investments. The complexity of project activities, including submarine cable deployment, fiber extension, and regional financial intermediation, requires continuous and transparent communication with a wide range of stakeholders. ESS10 ensures that engagement processes are inclusive, culturally appropriate, and responsive to the needs of different groups, particularly vulnerable and marginalized populations, thereby supporting both project acceptability, sustainability and success. To meet these requirements, each participating country has developed a Stakeholder Engagement Plan (SEP) tailored to the project's scope and risks prior to project appraisal. The SEPs have been consulted upon and will be publicly disclosed prior to appraisal.

This iteration of the SEP, while benefitting from previous consultations and assessment, provides guidelines and procedures for engaging stakeholders in the preparation and implementation of other safeguard documents, as well as throughout the execution of sub-project components. More importantly, the SEP aims to facilitate the involvement of both affected and interested stakeholders to ensure that the project design, particularly the approaches and activities related to stakeholder engagement, is carried out in a participatory and inclusive manner, and is responsive to the context and needs of different groups.

### **1.7 Objectives of the Stakeholder Engagement Plan (SEP)**

The Stakeholder Engagement Plan proposes a program for stakeholder engagement, including public information disclosure and multi-level consultations throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project. Specifically, the SEP seeks to:

- Outline stakeholder engagement requirements as provided under the national regulatory frameworks and World Bank ESF.
- Identify project stakeholders and build strong relationships with the stakeholders
- Determine the interests, priorities, and degree of influence of the various stakeholders through open engagement and expertise.
- Establish trust and transparency, which are essential for the successful execution of a project.
- Provide for the timely, comprehensible, and accessible disclosure of the appropriate project information to stakeholders.
- Outline the methods and tools for stakeholder engagement
- Provide guidance on meeting the requirements of ESS10, including stakeholder consultation and project GRM systems and effectiveness
- Developing and implementing a monitoring and reporting framework that is responsive to the data requirements of various stakeholders, particularly those at the national level.

## **2.0 REGULATORY REQUIREMENTS**

---

Stakeholder engagement is a fundamental element of sustainable development, alongside governance and corporate social responsibility. Given Liberia's history of civil conflict and economic instability, successful stakeholder engagement is essential for achieving inclusive decision-making, transparency, and accountability. The legal and regulatory framework governing stakeholder engagement in Liberia encompasses national laws, international conventions, and sector-specific policies.

### **2.1 National Policies, Laws and Regulations**

#### **Liberian Constitution (1986)**

Liberia's 1986 Constitution establishes the foundational guarantees for participatory governance. Article 15(a) protects freedom of expression, while Article 17 safeguards the rights to assembly and association, both of which are essential for meaningful stakeholder engagement. Article 7 obliges the government to promote inclusive governance, implicitly endorsing stakeholder involvement in policy formulation and implementation. These provisions foster an enabling environment for civil society organizations, community groups, and other stakeholders to engage in governance processes.

#### **Public Procurement and Concessions Commission (PPCC) Act (2010)**

The Public Procurement and Concessions Commission Act of 2010 mandates public consultations for major concession agreements, requiring private sector actors to engage with affected communities prior to the implementation of the project.

#### **Liberia Extractive Industries Transparency Initiative (LEITI) Act (2009)**

The Liberia Extractive Industries Transparency Initiative (LEITI) Act institutionalizes multi-stakeholder oversight of the mining and forestry sectors through its distinctive governance structure, which includes representatives from government, industry, and civil society. Section 4.3 establishes a multi-stakeholder group composed of government and industry representatives, as well as civil society, to oversee revenue management. Section 6 mandates public disclosure of contracts and payments to promote accountability and mitigate conflicts.

#### **Environmental Protection and Management Law (2003) and ESIA Regulations**

Environmental protection laws now include robust requirements for stakeholder engagement. The Environmental Protection and Management Law of 2003 and its implementing regulations mandate Environmental and Social Impact Assessments (ESIAs) for development projects, with specific provisions for community consultations and public disclosure of assessment findings. This legal framework ensures that environmental decision-making considers the perspectives of affected populations.

#### **Land Rights Act (2018)**

This legislation acknowledges customary landownership and introduces the principle of Free, Prior and Informed Consent (FPIC), providing communities with substantial leverage in decisions affecting their lands and resources. The Act's provisions for participatory land-use planning signify a considerable advancement in inclusive development planning.

## 2.2 World Bank Policies and Environmental and Social Standards

All except one of the World Bank's Environmental and Social Standards are relevant to WARDIP, signifying its complexity. With regards to the SEP, the World Bank mandates stakeholder engagement and information disclosure as fundamental components for all its funded projects. As articulated in the opening provisions of Environmental and Social Standard 10 (ESS 10), transparent and inclusive dialogue between borrowers and project stakeholders represents a cornerstone of international best practices. ESS 10 establishes explicit requirements for borrowers to develop and implement comprehensive stakeholder engagement plans. These plans must ensure ongoing interaction with stakeholders throughout all project phases, with particular emphasis on early consultations that significantly influence project design.

The Standard emphasises the obligation to conduct substantial consultations with all relevant parties, ensuring that information is shared in a timely, accessible, and culturally sensitive manner. Such consultations must take place in an environment free from coercion, manipulation, or any form of discriminatory practices. The project's complexity and scale necessitate particularly thorough engagement and communication strategies that ensure consistent dialogue throughout the entire project lifecycle, addressing the multifaceted needs and concerns of all participating communities and institutions, and those impacted.

## 3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

---

To meet best practice approaches, the Project will apply the following key principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, older persons, persons with disabilities, displaced populations, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- **Meaningful:** Engagement with stakeholders will be designed to be a purposeful and constructive process, ensuring that their input is not only heard but also incorporated into project decisions and outcomes. This means creating opportunities for stakeholders to provide relevant insights at critical stages of the project and ensuring that these contributions lead to tangible impacts. The project will prioritize the continuous engagement of stakeholders, especially those directly affected, ensuring that their perspectives influence both the strategic direction and operational management of the project.
- **Flexibility:** In situations where external factors, such as governance risks or political instability, limit traditional face-to-face engagement, the methodology will adapt to

alternative forms of communication, to ensure continued stakeholder engagement while maintaining safety and inclusivity.

### **3.1 Methodology for Preparation of the SEP**

Diverse stakeholders were consulted during the development of SEP. The Ministry of Telecommunications and Post (MoPT) and the WB reviewed the engagement tools, such as questionnaires and interview guides, including for the E&S Assessment and Feasibility study guiding design consideration for WARDIP-2.

The E&S Assessment and Feasibility study methodology began with a planning phase, during which the study team developed a work plan outlining the sequence of activities, responsibilities, and timelines. This plan was structured to ensure compliance with the requirements of the Environmental Protection Agency (EPA) of Liberia, as well as relevant guidelines from the World Bank's Environmental and Social Framework (ESF) and the International Finance Corporation (IFC) Performance Standards. During this stage, Terms of Reference (TOR) for the firm conducting the study were reviewed and refined, ensuring that the scope of the study covered both environmental and social aspects comprehensively.

#### **3.1.1 Desk Review and Secondary Data Collection**

The desk-based research phase involved gathering and analyzing secondary information from multiple sources. Relevant documents included national legislation, environmental policies, strategic development plans, marine biodiversity studies, climate records, and socio-economic surveys. International references such as the United Nations Convention on the Law of the Sea (UNCLOS) and submarine cable installation guidelines from the International Cable Protection Committee (ICPC) were also consulted.

Data sources included government ministries (e.g., Ministry of Posts and Telecommunications, Ministry of Public Works), the Liberia Maritime Authority, the Environmental Protection Agency, and local government offices in Grand Bassa County. Scientific journals, regional studies on West African marine environments, and prior environmental assessments for similar infrastructure projects were also reviewed. This background research helped establish the environmental and social baseline before field surveys began.

#### **3.1.2 Field Surveys – Environmental Baseline**

Field surveys were conducted to collect site-specific data on the physical, biological, and ecological conditions in the project area.

These surveys covered both onshore and offshore environments:

- **Onshore Surveys:**

The E&S Assessment team assessed the proposed landing site and surrounding areas for coastal morphology, vegetation types, soil conditions, and any signs of erosion or habitat degradation. Photographic documentation and GPS mapping were carried out to create accurate records of site conditions. Special attention was paid to mangrove stands, beach dynamics, and human activities in the area, such as fishing, boat launching, and small-scale commerce.

An important part of the planning stage was the selection of the study area. This involved identifying the proposed cable landing site at Big Fanti Town in Buchanan and mapping the offshore route toward deep water. Geographic Information System (GIS) data, satellite imagery, and nautical charts were reviewed to understand physical conditions, land use patterns, and potential environmental sensitivities. These preliminary observations informed the design of the fieldwork program.

#### **Offshore Surveys:**

Marine specialists carried out nearshore and offshore observations, including seabed profiling and habitat identification. These surveys aimed to detect the presence of seagrass beds, coral patches, or areas of high fish density that might require avoidance or mitigation measures. Water quality parameters; such as temperature, salinity, pH, and turbidity—were measured using handheld instruments, while marine biodiversity observations were made using snorkeling and small-boat transects in shallow waters.

#### **Socio-Economic and Cultural Assessment**

Recognizing that the project will influence local communities, a dedicated socio-economic assessment was undertaken. This involved direct engagement with community members. Participants included artisanal fishers, boat owners, women's cooperatives, youth groups, local business operators, and representatives from traditional leadership structures.

The assessment gathered information on livelihoods, household income sources, reliance on coastal and marine resources, cultural practices linked to the sea, and existing infrastructure such as schools, clinics, and markets. It also explored community concerns about potential disruptions during cable installation, as well as expectations for potential benefits like jobs, improved connectivity, and economic opportunities.

Stakeholders were identified and characterised according to their statutory functions, responsibilities, and mandates within the ICT sector as well as potential impact of the project. The organisations encompass a variety of stakeholder categories, including potential project communities, government institutions, regulators, non-governmental organisations (NGOs) and civil society organisations (CSOs), associations, the private sector, media, and development partners (see Annex 1 for list of stakeholders engaged directly).

To gather data on the characteristics, knowledge, and perceptions of stakeholders, including communities, associations, regulators, government agencies, civil society organisations, and development partners, structured questionnaires and interview protocols were employed (see Annex 2 for tools used), along with field observations. The areas in which data were collected included background information such as relevant national and local laws and project documents, was reviewed to obtain secondary data. The document evaluation helped identify critical stakeholders for the WARDIP-SOP2 and potential data gaps. Information from secondary sources included regulations, environmental and social (E&S) requirements, and the prerequisites to initiate the WARDIP-SOP2.

Stakeholder engagement was an integral part of the methodology, ensuring transparency and building trust. Meetings were organized with national agencies, local authorities, and community-based organizations. The purpose of these engagements was to share information about

the project, clarify its potential impacts, and gather input for designing appropriate mitigation measures.

Engagement techniques included public meetings, targeted consultations with interest groups, and key informant interviews. Visual aids such as maps, diagrams, and photographs were used to make technical concepts more understandable to non-specialist audiences. Attendance registers and meeting minutes were kept for all sessions, forming part of the documentation for the study.

The Consultant assisting with the preparation of the SEP examined different iterations of the Project Appraisal Document (PAD), the Preliminary Environmental and Social Assessment report for the Submarine Cable in Liberia, along with the WB's policies, regulations, and E&S Framework, to identify potential E&S issues related to the project.

### **3.2 Stakeholder Identification**

Stakeholder identification was carried out to determine the project stakeholders, their key groupings and sub-groupings, as well as their needs and expectations regarding engagement with the project. Stakeholders were also mapped according to their roles, level of influence, and degree of potential impact from the project. At the national level, institutions such as the Environmental Protection Agency (EPA), the Liberia Telecommunications Authority (LTA), the National Fisheries and Aquaculture Authority (NaFAA), the Ministry of Mines and Energy, and the Ministry of Transport were engaged because of their regulatory and oversight responsibilities.

County and local authorities, including district commissioners, municipal officials, and traditional leaders, were consulted to ensure local-level governance structures were informed and actively involved. At the community level, engagement was extended to town chiefs, fishermen cooperatives, women's market groups, and youth associations, who represent the primary resource users in the affected area.

Civil society organizations, academic institutions, and environmental researchers were included to capture independent perspectives, while private sector stakeholders such as telecommunications companies, internet service providers, and port and maritime authorities were also consulted due to their operational interest in the project. Finally, special attention was paid to vulnerable groups, including women, elderly residents, and low-income households, who are often underrepresented in decision-making processes but may face unique risks or barriers to accessing project benefits.

Once the stakeholders were identified and mapped, a stakeholder analysis was conducted to gain a deeper understanding of the interests of the stakeholder group, how they would be affected and to what extent, as well as the influence they might have on the project. High, medium, and low interest and impact classifications were used to determine the best way to engage stakeholders who are interested in the project and may have the power to affect its outcomes. This also demonstrates how these stakeholders are equally involved throughout the project planning and execution process based on their level of interest.

### **3.3 Stakeholder Categorization**

Key stakeholder groups identified for project engagement have been categorized into three main categories:

- Affected Parties,
- Interested Parties, and

- Disadvantaged and Vulnerable Groups

### 3.3.1 Project Affected Parties

Project-affected parties include individuals, communities, and entities within the Project Area of Influence who may experience direct effects, whether actual or potential, from project activities. The active participation of these stakeholders is crucial for identifying impacts, assessing significance, and developing mitigation strategies. Their close involvement will ensure that project decisions reflect local realities and needs. Details of group are in Table 3.1 below.

**Table 3-1: Key Project Affected Parties (including some of the most vulnerable and disadvantaged groups)**

|   |   |  |
|---|---|--|
| Landowners or Land Users along the Right of Way (ROW) | Individuals or groups owning or using land where the cables and related infrastructure will be deployed.  | Concerns about land acquisition, temporary loss of access, damage to property, fair compensation, and restoration of affected land.          |
| Women and other (landless) farmers                    | Rice farmers/vegetable growers in the coastal area whose land may be required for the construction of the landing station or for the fiber cable. | Concerns about land acquisition, temporary loss of access, damage to property, fair compensation, and restoration of affected land.          |
| Community Members near Construction Sites             | Residents living close to areas where civil work will take place.   | Concerns about dust, noise, vibration, safety risks, and temporary access restrictions; need for timely information and mitigation measures. |
| Underserved Communities and Institutions              | Remote or low-connectivity communities, schools, and public facilities that will benefit from expanded infrastructure.                            | Strong interest in improved internet access, affordability, reliability, and digital literacy opportunities.                                 |
| Fishing Communities                                   | Artisanal and small-scale fishers near coastal landing points for the underwater cable.   | Concerns about restricted fishing zones during installation, potential impacts on fishing grounds, and safety at sea.                        |
| Business Owners Affected by Construction              | Shops, markets, transport operators, and other businesses near work zones.  | Concerns about reduced customer access, disruption of supply chains, and temporary business closure; interest in timely completion.          |

### 3.3.2 Other Interested Parties

This group consists of individuals, organisations, and institutions that, although not directly impacted, perceive their interests as affected by the project or have the capacity to influence its implementation. This group may include local authorities, advocacy organisations, or nearby communities whose participation enriches project planning through diverse perspectives. Potential interested parties include, among others, those mentioned in Table 3.2 below, along with an assessment of their mandated role which could be pivotal to the success of WARDIP-2:

**Table 3-2: List of Other Interested Parties and their Role/ Mandate**

|  |   |  |
|--|---|--|
| Government Ministries, Departments & Agencies (MDAs) | Ministry of Finance and Development Planning (MFDP) | Ensure budget allocation, integrate project into national development strategies, oversee fiscal sustainability. |
|  | Ministry of Posts and Telecommunications (MPT)      | Lead ICT policy development, coordinate digital infrastructure planning, ensure sector regulation.               |

|  |  |  |
|--|--|--|
| Utility Service Providers  | Ministry of Commerce & Industry  | Promote digital trade, regulate e-commerce, support private sector adoption of digital tools.  |
|  | National Identification Registry (NIR)   | Manage and integrate digital ID systems for authentication and service delivery.   |
|  | Liberia Telecommunications Authority (LTA)   | Regulate telecom sector, ensure fair competition, and oversee service quality standards.   |
|  | Entities providing water, electricity, and waste management whose lines may be co-located or crossed by cable works.   | Concerns about damage to existing infrastructure; interest in coordination to prevent service interruptions.   |
| Local Government Authorities   | Municipal and county administrations in the project area.  | Interest in infrastructure upgrades, economic benefits, and local job creation; concerns about managing community expectations.  |
| Local Transport Operators  | Taxi drivers, motorbike riders, and goods transporters operate near construction areas.  | Concerns about traffic disruptions, rerouting, and delays; interest in clear traffic management measures.  |
| Direct Workers and employees   | Includes PIU and PFMU staff, other direct project workers.   | Concerned with implementing the project, including the SEP, and directly or indirectly affected by the project during all project phases. Direct workers are employed by the project developer who is the primary responsible entity for this project, who will oversee the overall performance during all phases and will be the primary responsible entity compliance with regulatory requirements as well as World Bank requirements. |
| Contracted Workers/Contractors/Suppliers/Sub-Contractors/Installation Team | Contracted workers and those employed by third parties such as the Contractor, Suppliers and/or subcontractors. This includes temporary and part-time workers. | Directly or indirectly affected by the Project during implementation/ installation Phase. Contractor workers are responsible for complying with all implementation activities.   |
| Contracted Workers/Operator's and Operation and Maintenance Teams          | O&M workers are responsible for the operation and maintenance of the Digital System during the operation phase of the project.                                 | Directly or indirectly affected by the project during the O&M Phase.   |
| Local Workers and Laborers   | Individuals seeking employment opportunities during construction and maintenance.  | Interest in job opportunities, fair wages, and safe working conditions.  |
| Port and Coastal Facility Operators  | Operators managing ports or jetties used for cable landing.  | Concerns about scheduling and operational disruption during cable landing activities.  |
| Telecommunication Operators and ISPs                                       | Companies that may interconnect or share infrastructure.   | Interest in technical standards, infrastructure access agreements, and commercial opportunities.   |
| Educational Institutions   | Schools, colleges, and universities.   | Interest in faster, more reliable internet for teaching, learning, and research.   |

|  |   |  |
|--|---|--|
| Healthcare Facilities                              | Clinics and hospitals in project areas.                     | Interest in improved digital connectivity for telemedicine, records management, and emergency communication. |
| Development Partners & International Organizations | World Bank  | Provide financing, technical advisory, and policy support for digital transformation.                        |
|  | African Development Bank (AfDB)                             | Fund infrastructure and capacity building, support ICT infrastructure expansion.                             |
|  | United Nations agencies (UNDP, UNICEF, WHO, UNESCO)         | Provide technical assistance in governance, health, education, and social inclusion.                         |
|  | European Union (EU)   | Fund connectivity projects, promote digital governance reforms and standards.                                |
|  | International Telecommunication Union (ITU)                 | Provide ICT standards, guidelines, and global best practices.  |
| Private Sector & Industry Players                  | Telecom Operators (e.g., Orange Liberia, Lonestar Cell MTN) | Expand broadband access, improve network coverage, and support mobile services integration.                  |
|  | Internet Service Providers (ISPs)                           | Provide internet connectivity, enhance network reliability, and improve speed/coverage.                      |
|  | Technology Companies & Vendors                              | Supply hardware, software, and platforms; provide integration and maintenance services.                      |
|  | Banks & Financial Institutions                              | Enable digital payments, mobile banking, and financial inclusion services.                                   |
|  | Chambers of Commerce and Business Associations (CCBA)       | Advocate for business participation, promote adoption of digital solutions.                                  |
| Civil Society & Community Stakeholders             | NGOs and Community-Based Organizations (CBOs)               | Promote digital literacy, advocate for inclusion of vulnerable groups.                                       |
|  | Academic & Research Institutions                            | Provide training, research, and innovation for capacity building.  |
|  | Media Houses  | Disseminate information, raise public awareness, and encourage adoption.                                     |
|  | Professional Associations                                   | Offer technical expertise, promote professional standards in ICT.  |
| Regional & Cross-Border Entities                   | ECOWAS Commission   | Facilitate regional ICT policy harmonization, promote cross-border digital trade.                            |
|  | Mano River Union (MRU)                                      | Coordinate regional connectivity initiatives and shared services.  |

**3.3.3 Disadvantaged and Vulnerable Groups**

Some project impacts are anticipated to disproportionately affect poor or vulnerable individuals or groups, details of which can be found in the E&S Assessment and project Feasibility study. These necessitate specific engagement measures to ensure their equitable involvement in the project's consultation and decision-making process, as well as mitigating some of the unavoidable and/or cumulative negative impacts. Some major concerns around these groups what could garner interest in the project are provided in Table 3.3 below:

**Table 3-3 Potential Interests and Concerns of Different Disadvantaged and/or Vulnerable Groups**

|  |  |
|--|--|
| Rural Communities                              | Often, these groups lack access to reliable internet and digital services; SOP2 could improve connectivity, access to information, e-services, and economic opportunities.   |
| Fishing and coastal communities                | Fishers already struggling with declining catches due to overfishing and industrial activities may find their vulnerability worsened by temporary access restrictions during cable installation (cumulative impact).<br>A large proportion of coastal households depend on artisanal and small-scale fisheries for income, food security, and cultural identity. The submarine cable landing project, though intended to improve national connectivity, poses potential risks of disrupting fishing livelihoods during both the construction and operational phases. These disruptions may be temporary or, if not managed effectively, lead to longer-term socio-economic challenges for already vulnerable fishing households.   |
| Women and Girls                                | Women in coastal communities are often economically active but face barriers in accessing digital technology due to lower income levels, limited digital literacy, and cultural constraints. For example, women fish processors and traders may not have access to smartphones or online platforms that could expand their market reach.<br>Women are deeply involved in the fish value chain, particularly in processing, smoking, drying, and selling fish at markets. Any reduction in fish catch would disproportionately impact on women’s income opportunities and household food security. Since women’s earnings often go directly toward children’s education and nutrition, disruptions in fishing livelihoods may have intergenerational effects, amplifying poverty and vulnerability in coastal communities. Women, though heavily engaged in fish processing and petty trading along Liberia’s coastline, often lack formal land ownership or decision-making power in land governance structures. They are particularly vulnerable to displacement without compensation if beach areas used for drying and selling fish are repurposed for cable landing infrastructure. Local conflicts over land, compensation and jobs may also impact women and girls disproportionately (SEAH/GBV). Women and girls also face gender gaps in digital literacy and access to technology; project can promote inclusion, skills training, and access to digital finance and education.<br>Meetings in close-by locations within communities, gender sensitive teaching and learning environments, and an accessible and dynamic GRM would be needed. |
| People with Disabilities (PWDs)                | Without targeted interventions, these groups may struggle to access affordable internet, participate in digital services, or engage with governance processes enabled by better connectivity.<br>Accessible training venues, materials and delivery methods including use of sign-language would be needed. Digital platforms can provide accessible services (e.g., assistive technologies, online learning, telehealth) and reduce mobility-related barriers. Further, an accessible and dynamic GRM would be needed.  |
| Low-Income Households                          | The presence of digital infrastructure may increase land demand in the cable landing area, potentially displacing low-income households. Limited access to affordable devices and internet; SOP2 can enable affordable connectivity and digital financial inclusion. Distance to meeting venue, travel costs, etc., would be considered in ensuring meaningful engagement with affected low-income household.  |
| Youth (especially unemployed or underemployed) | Often early adopters of digital technology, the youth lack stable income or access to training, which limits their ability to fully benefit from new digital opportunities. If programs for youth digital skills training, entrepreneurship, and innovation hubs are not integrated into the project’s roll-out, a large segment of the population may remain excluded. This exclusion could fuel frustration, particularly among unemployed youth, who already face high social vulnerability.  |

|                            |   |
|----------------------------|---|
|                            | Digital skills training and online job platforms can increase employment and entrepreneurship opportunities.  |
| Local Workers and Laborers | Employment opportunities during construction and maintenance are key, along with strong labor GRM to ensure fair compensation, non-discrimination and prevention of abuse, exploitation and violence, including child labor   |
| Older Persons              | Often excluded from digital platforms, SOPs can improve access to health services, social support, and information through user-friendly technologies. This group would need special attention to assist in technology adaptation and use and through affective stakeholder |

### 3.4 Key Project Partners and Roles

The success of WARDIP-SOP2 relies on close collaboration with a diverse set of partners across multilateral, regional, national, and private sectors. These partnerships bring complementary mandates in financing, regulation, capacity building, and service delivery. Together, they provide the foundation to expand regional connectivity, strengthen digital markets, and accelerate inclusive digital transformation.

**Table 3-4: Key Partners and Roles**

| Name of Partner   | Nature of Involvement /Description  |
|---|---|
| European Union (EU)                                       | Catalytic grant financing and technical support for regional submarine cables and cross-border backbones; ongoing coordination with the World Bank on design, sequencing, and financing.  |
| European Investment Bank (EIB)                            | Long-term sovereign loan financing for the main trunk of the regional submarine cable system, ensuring system-level bankability; coordinated with EU grants and IDA financing for landings.   |
| AUC/Smart Africa Alliance                                 | Alignment with AU Digital Transformation Strategy and Smart Africa SDM agenda. Through Smart Africa Digital Academy (SADA) Academy, provision of structured policy and regulatory training to governments and regulators.   |
| ECOWAS Commission   | Provides the overarching regional policy framework for digital market integration, including regulatory harmonization on roaming, spectrum, data protection, and e-commerce. Coordinates member states in aligning national actions with regional commitments.                        |
| National Telecom  | Operators Investing in submarine cables, national backbones, and last-mile broadband; critical for expanding affordable access and implementing open-access models.   |
| African Guarantee and Economic Cooperation Fund (FAGACE)  | Establish and maintain an Environmental and Social Management System (ESMS), including policies, procedures, and capacity for screening, assessing, and monitoring the E&S risks of subprojects financed through bond proceeds – communicating the same to Steering Committee via PIU |
| West African Economic and Monetary Union (WAEMU), Liberia | Developing and implementing a comprehensive training program open to policy and decision makers in charge of implementing digital transformation programs, and to the staff of WAEMU  |

### 3.5 Stakeholder Analysis

The first step in stakeholder analysis was the identification and mapping of different types and categories of stakeholders, as presented in Tables 3.1 – 3.4. Amongst those mapped, different groups

of stakeholders are expected to be impacted differently by the project, requiring appropriate and proportionate mitigation strategies, to clarify project contours and respond to feedback and/or concerns. A preliminary ranking of positive and negative impacts on different stakeholder groups is provided in Table 3.5 below, followed by an assessment of different groups' interests and influence over project outcomes Table 3.6:

**Table 3-5: Level of Impact on Project Stakeholders**

| <b>Project Affected Parties</b>  |  |                 |
|--|--|-----------------|
| 1  | Landowners or Land Users along the Right of Way (ROW)                          | -High/-Medium   |
| 2  | Community Members near Construction Sites                                      | -High           |
| 3  | Persons having or lacking digital access                                       | +High           |
| 4  | Business Owners Affected by Construction                                       | -Medium         |
| 5  | Local Transport Operators  | -/+Low          |
| 6  | Fishing Communities  | -High/-Medium   |
| 7  | Utility Service Providers  | +High           |
| 8  | Local Government Authorities   | +High           |
| 9  | Educational Institutions   | +High           |
| 10   | Healthcare Facilities  | +High           |
| 11   | Port and Coastal Facility Operators  | -Medium         |
| 12   | Telecommunication Operators and ISPs   | +/- High        |
| 13   | Local Workers and Laborers   | -Medium/+High   |
| <b>Interested Party</b>  |  |                 |
| 14   | Government Ministries, Departments & Agencies (MDAs)                           | +High           |
| 15   | Development Partners & International Organizations                             | +Medium         |
| 16   | Private Sector & Industry Players  | +High           |
| 17   | Civil Society & Community Stakeholders   | +High           |
| 18   | Regional & Cross-Border Entities   | +High           |
| <b>Disadvantaged or Vulnerable Parties (vulnerabilities may intersect)</b> |  |                 |
| 19   | Coastal communities and (subsistence) fisherfolk                               | +/- High        |
| 20   | Women and Girls  | +High           |
| 21   | Youth and young persons (Unemployed/Underemployed/Low digital safety literacy) | +High/-Medium   |
| 22   | People with Disabilities (PWDs)  | +Medium/High    |
| 23   | Households in extreme poverty  | +High           |
| 24   | Older Persons  | +/- Medium      |
| 25   | Single mothers/ Female heads of households                                     | +High / -Medium |
| 26   | Women homebased workers  | +High / -Low    |
| 27   | Families living in extreme poverty   | +High / -Low    |

**Table 3-6: Assessment of Stakeholders' Interest in and Potential Roles in Meeting Project Outcomes**

|   |   |   |  |   |
|---|---|---|--|---|
| <b>Government Ministries, Departments &amp; Agencies (MDAs)</b> | Ministry of Finance and Development Planning (MFDP) | Oversees national budget and development planning                                   | Ensure financial sustainability, integrate digital integration into national plans     | Ensure budget allocation, integrate project into national development strategies, oversee fiscal sustainability |
|   | Ministry of Posts and Telecommunications (MPT)      | Leads ICT sector policy and coordination  | Desire to expand digital infrastructure and regulate sector growth                     | Lead ICT policy development, coordinate digital infrastructure planning, ensure sector regulation               |
|   | Ministry of Commerce & Industry (MoCI)              | Regulates trade and supports private sector growth                                  | Promote e-commerce and digital trade for economic growth                               | Promote digital trade, regulate e-commerce, support private sector adoption of digital tools                    |
|   | National Identification Registry (NIR)              | Manages national ID systems   | Enhance efficiency of service delivery through digital ID integration                  | Manage and integrate digital ID systems for authentication and service delivery                                 |
|   | Liberia Telecommunications Authority (LTA)          | Regulates telecommunications services   | Strengthening telecom services, expand access, and ensure fair competition             | Regulate telecom sector, ensure fair competition, oversee service quality standards                             |
| <b>Development Partners &amp; International Organizations</b>   | World Bank (WB)                                     | Global development finance institution  | Support Liberia's digital transformation for governance, economy, and service delivery | Provide financing, technical advisory, and policy support   |
|   | African Development Bank (AfDB)                     | Regional development bank   | Invest in ICT infrastructure and capacity building                                     | Fund infrastructure and capacity building, support ICT infrastructure expansion                                 |
|   | United Nations agencies (UNDP, UNICEF, WHO, UNESCO) | Multilateral agencies supporting governance, social services, and human development | Ensure digital integration supports education, health, and inclusion                   | Provide technical assistance in governance, health, education, and social inclusion                             |
|   | European Union (EU)                                 | Regional political and economic union   | Promote digital governance and connectivity in partner countries                       | Fund connectivity projects, promote digital governance reforms and standards                                    |
|   | International Telecommunication Union (ITU)         | UN specialized agency for ICT   | Promote ICT standards and digital inclusion  | Provide ICT standards, guidelines, and global best practices  |

|   |   |   |  |  |
|---|---|---|--|--|
|   | European Investment Bank (EIB)                        | Long-term sovereign loan financier  | Long-term sovereign loan financing for the main trunk of the regional submarine cable system, ensuring system-level bankability; supports EU grants and IDA financing for landings | Fund connectivity projects, promote digital governance reforms and standards               |
|   | AUC/Smart Africa Alliance                             | Works through the Smart Africa Digital Academy (SADA) Academy, for the provision of structured policy and regulatory training to governments and regulators | Alignment with AU Digital Transformation Strategy and Smart Africa SDM agenda  | Policy and regulatory training to governments and regulators                               |
|   | National Telecom                                      | Operators investing in submarine cables, national backbones, and last-mile broadband  |  | Critical for expanding affordable access and implementing open-access models               |
| <b>Private Sector &amp; Industry Actors</b>       | Telecom Operators (Orange Liberia, Lonestar Cell MTN) | Providers of mobile and internet services   | Expand customer base and network coverage  | Expand broadband access, improve network coverage, and support mobile services integration |
|   | Internet Service Providers (ISPs)                     | Providers of fixed and wireless internet services   | Increase internet penetration and service reliability  | Provide internet connectivity, enhance reliability, improve speed/coverage                 |
|   | Technology Companies & Vendors                        | Suppliers of ICT hardware, software, and platforms  | Opportunities for sales, integration, and innovation   | Supply hardware, software, platforms; provide integration and maintenance                  |
|   | Banks & Financial Institutions                        | Providers of financial services   | Expand digital finance and mobile banking services   | Enable digital payments, mobile banking, and financial inclusion services                  |
|   | Chambers of Commerce & Business Associations (CCBA)   | Business advocacy and networking bodies   | Support private sector readiness for digital transformation  | Advocate for business participation, promote adoption of digital solutions                 |
| <b>Civil Society &amp; Community Stakeholders</b> | NGOs & Community-Based Organizations (CBOs)           | Advocacy and development organizations  | Ensure inclusion of marginalized and vulnerable groups   | Promote digital literacy, advocate for inclusion of vulnerable groups                      |
|   | Academic & Research Institutions                      | Higher education and training institutions  | Integrate ICT in teaching, research, and innovation  | Provide training, research, and innovation for capacity building                           |

|   |   |   |   |  |
|---|---|---|---|--|
|   | Media Houses                              | Information dissemination entities  | Promote awareness and adoption of digital services          | Disseminate information, raise awareness, encourage adoption                     |
|   | Professional Associations                 | ICT experts and related professions                                       | Promote best practices and professional standards           | Offer technical expertise, promote professional standards in ICT                 |
| <b>Regional &amp; Cross-Border Entities</b> | ECOWAS Commission                         | Regional economic community   | Harmonize ICT policies and facilitate regional trade        | Facilitate regional ICT policy harmonization, promote cross-border digital trade |
|   | Mano River Union (MRU)                    | Subregional cooperation organization                                      | Promote shared ICT services and regional connectivity       | Coordinate regional connectivity initiatives and shared services                 |
| <b>Disadvantaged and Vulnerable Groups</b>  | Rural Communities                         | Remote, underserved populations   | Access to internet, e-services, and economic opportunities  | Targeted connectivity and service access initiatives                             |
|   | Women and Girls                           | Group with digital access and skills gaps                                 | Inclusion, education, financial empowerment                 | Programs for digital literacy, gender inclusion, access to finance               |
|   | Persons with Disabilities (PWDs)          | People with impairments   | Access to assistive tech, remote services, inclusion        | Accessible platforms, tailored tools, inclusive service design                   |
|   | Low-Income Households                     | Limited-income families   | Affordable connectivity and devices, digital finance access | Subsidized services, community internet hubs, mobile money                       |
|   | Youth (Unemployed/Underemployed)          | Young job seekers & entrepreneurs   | Digital skills training, online work opportunities          | Training programs, innovation hubs, job-matching platforms                       |
|   | Older Persons                             | Older citizens with low digital literacy                                  | Access to healthcare, social support, and information       | User-friendly technologies, telehealth, training programs                        |
| <b>Affected Parties (Direct Impact)</b>     | Landowners or Land Users along the ROW    | Individuals/groups with land used for cable and infrastructure deployment | Land access, compensation fairness, restoration of land     | Provide consent, engage in compensation agreements, support access for works     |
|   | Community Members near Construction Sites | Residents living close to works   | Dust, noise, safety concerns, restricted access             | Provide feedback on mitigation measures, adapt daily routines                    |
|   | Underserved Communities & Institutions    | Remote or low-connectivity areas  | Improved access, affordability, reliability                 | Participate in digital literacy programs, adopt new services                     |
|   | Business Owners Affected by Construction  | Shops, markets, service providers near work zones                         | Disruption to business, customer access issues              | Coordinate with contractors, adjust business operations                          |

|  |                                    |   |  |  |
|--|------------------------------------|---|--|--|
|  | Local Transport Operators          | Taxi, motorbike, goods transporters near construction | Traffic disruptions, rerouting                           | Cooperate with traffic management plans                    |
|  | Fishing Communities                | Fishers near coastal cable landing points             | Restricted fishing areas, gear damage concerns           | Coordinate with project to avoid hazards, report impacts   |
|  | Utility Service Providers          | Water, electricity, waste management                  | Risk of damage to existing infrastructure                | Coordinate to prevent service interruptions                |
|  | Local Government Authorities       | Municipal & county administrations                    | Local economic benefits, managing community expectations | Liaise between project and community, support local hiring |
|  | Educational Institutions           | Schools, colleges, universities                       | Better connectivity for education                        | Integrate ICT into teaching and research                   |
|  | Healthcare Facilities              | Clinics, hospitals                                    | Improved telemedicine and records management             | Use upgraded connectivity for service delivery             |
|  | Port & Coastal Facility Operators  | Operators managing ports/jetties for cable landing    | Avoid operational disruption                             | Coordinate scheduling and safety measures                  |
|  | Telecommunication Operators & ISPs | Companies interconnecting or sharing infrastructure   | Infrastructure access, technical standards               | Negotiate infrastructure-sharing agreements                |
|  | Local Workers & Laborers           | Skilled/unskilled workers                             | Job opportunities, fair wages                            | Provide labor, participate in training                     |

**Table 3-7: Analysis of Stakeholder Interests and Influence**

|   |        |   |        |
|---|--------|---|--------|
| Ministry of Finance and Development Planning (MFDP) | High   | Direct oversight of project budgeting, integration into national development plans, and fiscal sustainability | High   |
| Ministry of Posts and Telecommunications (MPT)      | High   | Leads ICT policy and regulatory framework; key in infrastructure coordination                                 | High   |
| Ministry of Commerce & Industry (MoCI)              | Medium | Supports digital trade policy, promotes private sector digital adoption                                       | Medium |
| National Identification Registry (NIR)              | High   | Direct implementer of digital ID integration, crucial for service authentication                              | High   |
| Liberia Telecommunications Authority (LTA)          | High   | Regulates telecom sector, ensures fair competition and service quality  | High   |
| World Bank  | High   | Financing, technical support, and policy guidance   | High   |
| African Development Bank (AfDB)                     | Medium | Funding for infrastructure and capacity building  | Medium |
| UN Agencies (UNDP, UNICEF, WHO, UNESCO)             | Medium | Provide technical assistance for education, health, governance, and inclusion                                 | Medium |
| European Union (EU)                                 | Medium | Funding and policy reform support for connectivity and governance   | Medium |
| International Telecommunication Union (ITU)         | Medium | Provides global ICT standards and technical guidance  | Medium |

|   |        |   |        |
|---|--------|---|--------|
| Telecom Operators (Orange Liberia, Lonestar Cell MTN) | High   | Primary service providers for mobile and broadband connectivity   | High   |
| Internet Service Providers (ISPs)                     | Medium | Provide internet connectivity and improve coverage  | Medium |
| Technology Companies & Vendors                        | Medium | Supply ICT hardware, software, and platforms  | Medium |
| Banks & Financial Institutions                        | Medium | Provide mobile banking, digital payment systems, and financial inclusion services                                 | Medium |
| Chambers of Commerce & Business Associations          | Low    | Advocate for private sector engagement and adoption   | Medium |
| NGOs and CBOs   | Low    | Promote digital literacy and inclusion for vulnerable groups  | High   |
| Academic & Research Institutions                      | Medium | Provide training, research, and innovation support  | Medium |
| Media Houses  | Low    | Disseminate project information and public awareness  | Medium |
| Professional Associations                             | Low    | Represent ICT professionals and develop standards   | Medium |
| ECOWAS Commission                                     | Medium | Regional policy harmonization and digital trade facilitation  | Medium |
| Mano River Union (MRU)                                | Medium | Coordinate cross-border ICT services and shared infrastructure  | Medium |
| Rural Communities                                     | Low    | Beneficiaries of improved connectivity and e-services   | High   |
| Women and Girls                                       | Low    | Beneficiaries of digital inclusion and literacy programs  | High   |
| Persons with Disabilities (PWDs)                      | Low    | Beneficiaries of accessible digital platforms and services  | High   |
| Low-Income Households                                 | Low    | Beneficiaries of affordable digital services and financial inclusion  | High   |
| Youth (unemployed or underemployed)                   | Low    | Beneficiaries of digital skills and employment opportunities  | High   |
| Older Persons   | Low    | Beneficiaries of user-friendly services and telehealth  | Medium |
| Landowners or Land Users along ROW                    | Medium | Potentially affected by installation of underwater internet cables; may require compensation or access agreements | High   |
| Community Members near Construction Sites             | Low    | May face temporary disruptions due to dust, noise, vibration, and restricted access                               | Medium |
| Underserved Communities and Institutions              | Low    | Key beneficiaries of expanded infrastructure and services   | High   |
| Business Owners Affected by Construction              | Low    | May experience temporary loss of income or reduced customer access  | Medium |
| Local Transport Operators                             | Low    | May be impacted by construction-related road closures or diversions   | Medium |
| Fishing Communities                                   | Low    | May be temporarily affected by marine cable laying activities and restricted access to fishing grounds            | High   |
| Utility Service Providers                             | Medium | May need to coordinate relocation or protection of existing infrastructure  | Medium |
| Local Government Authorities                          | Medium | Facilitate permits, community engagement, and local coordination  | Medium |
| Educational Institutions                              | Medium | Beneficiaries of improved digital infrastructure for learning   | High   |
| Healthcare Facilities                                 | Medium | Beneficiaries of telemedicine and improved connectivity   | High   |
| Port and Coastal Facility Operators                   | Medium | May coordinate marine activities during cable installation  | Medium |
| Telecommunication Operators and ISPs                  | High   | Implementers and maintainers of connectivity infrastructure   | High   |

|                            |     |   |      |
|----------------------------|-----|---|------|
| Local Workers and Laborers | Low | Employment opportunities during construction and maintenance phases | High |
|----------------------------|-----|---|------|

## 4.0 Stakeholder Engagement Program

### 4.1 Summary of stakeholder engagement done during project preparation

The Project’s stakeholder engagement strategy draws on lessons learned from other World Bank-financed regional and/or digital projects, analytical work on digital economy under the Digital Economy for Africa Initiative, and lessons drawn from the ongoing implementation of WARDIP SOP1. The Ministry of Post and Telecommunication (MoPT) has been consulting with different stakeholders in the run-up to the second Series of Projects. Field visits and group consultations have been undertaken (in February and in August- September 2025 to engage affected parties at the local execution and central planning levels, as detailed in Table 4.1 below:

**Table 4-1: Details of Stakeholder Consultations Conducted**

|   |                                  |  |  |
|---|----------------------------------|--|--|
| <b>Introductory meeting and project orientation</b>   | 7 <sup>th</sup> August 2025      | Liberia Independent Information Commission; Cable Consortium of Liberia; ICT Liberia Environmental Protection Agency | Introduction to the project, including the broad financing agreement with the World Bank and the Government of Liberia through the Ministry of Finance and Development Planning for the; Current digital infrastructure and system challenges facing the ICT sector of Liberia and banding constraints restricting delivery of efficient internet services; Project governance structure (steering committee, technical working group(s), PIU and PFMU). |
| <b>Consultation on project risks and mitigation with beneficiary institutions</b><br>(Conference Room of the Ministry of Posts and Telecommunication) | 25 <sup>th</sup> September, 2025 | MFDP, LTA, IIC, CCL, New SPV, CBL, EPA, along with MoPT and PIU Staff, PPSD Consultant                               | Project risks assessment from the perspective of beneficiary institutions; project governance framework (including coordination); key recommendations to mitigate potential project risks; Key activities under the individual institutions  |
| <b>Field Visit Buchanan City, Grand Bassa, and</b>  | 20-22 February 2025              | MOPT; LTC; Orange, Liberia; CSquared; Bass Local government representatives  | Suitable landing Site for Amilcar Cabral Optical Submarine Cable Project; collaboration with city authorities to identify potential cable landing sites; Review of selected sites with the feasibility team to determine the best location; Compliance with regulations pertaining to Optical Fiber Submarine Cable installations; understand the layout of the CLSG network and assess the feasibility of linking.                                      |
| <b>CLSG Buchanan substation</b>   | 22 February 2025                 | Buchanan substation staff, local government representatives  | Review of selected sites with the feasibility team to determine the best location; Compliance with regulations pertaining to Optical Fiber Submarine Cable installations; understand the layout of the CLSG network and assess the feasibility of linking.   |

As a result of these engagements and dialogues with the MoPT, a Preliminary Environmental and Social Assessment for the Submarine cable landing sites in Liberia, and a Feasibility Study for the

installation of a second submarine cable in Liberia, were completed in 2025, with support from the World Bank. The draft reports are under review.

As a submarine cable is envisioned to be installed along the Liberian coast under WARDIP SOP 2, with a probable landing point in Buchanan, Grand Bassa County, or an alternate viable coastal community, such as Big Fanti Town, the E&S Assessment engaged closely with existing infrastructure, environmental sensitivities, and related socio-economic implications. Given the inherently transboundary and ecosystem-sensitive nature of submarine cable installation, especially in relation to marine habitats, fisheries, and community land use, both Assessment and Study conducted ensured a rigorous environmental and social due diligence process.

Stakeholder engagement was an integral part of the methodology of the preliminary E&S Assessment feeding into WARDIP-2 planning, whereby meetings were organized with local government, county- and national-level telecommunication services providers, Ministries, agencies, and community-based organizations, including women, youth, disability, and small and subsistence fishes and agriculture (the full report is available separately). The purpose of these engagements was to share information about the project, clarify its potential impacts, and gather input for designing appropriate mitigation measures around risks and concerns either identified by parties, or observed through field visits.

Engagement techniques included public meetings, targeted consultations with interest groups, and key informant interviews. Visual aids such as maps, diagrams, and photographs were used to make technical concepts more understandable to non-specialist audiences. Attendance registers and meeting minutes were kept for all sessions, forming part of the documentation for the Assessment. While a host of anticipated positive and negative impacts of WARDIP-2 can be found listed in Section 6 of Assessment report, key feedback from all the above are captured in Table 4.2 below, that can be built into the project through sub-projects, subject to local SEPs and E&S instruments.

**Table 4-2: Stakeholders Feedback**

|   |                       |   |
|---|-----------------------|---|
| Ministry of Finance and Development Planning (MFDP)   | Components 1, 2, 3, 5 | Request clarity on budget allocation and sustainability of financing; recommend integration into the national development plan; demand regular financial reporting. |
| Ministry of Posts and Telecommunications (MPT)        | Components 1, 2, 4    | Suggest alignment with existing ICT policies; request inclusion of rural connectivity targets; highlight regulatory needs for digital services.                     |
| Ministry of Commerce & Industry                       | Components 1, 4       | Recommend incentives for private sector adoption; request support for e-commerce platforms and training for SMEs.   |
| National Identification Registry (NIR)                | Components 1, 3,      | Request system compatibility with existing ID databases; recommend strengthening cybersecurity and data protection measures.  |
| Liberia Telecommunications Authority (LTA)            | All                   | Suggest setting minimum service quality standards; propose expansion of telecom infrastructure; emphasize fair competition in the market.                           |
| World Bank  | All                   | Recommend adherence to environmental and social safeguards; request detailed results framework; stress capacity-building components.                                |
| African Development Bank (AfDB)                       | Component 3, 4        | Suggest integration with regional ICT infrastructure projects; request co-financing opportunities and measurable development outcomes.                              |
| UN Agencies (UNDP, UNICEF, WHO, UNESCO)               | Component 4           | Recommend inclusion of marginalized groups; request focus on education, health, and governance applications of digital tools.                                       |
| European Union (EU)                                   | Component 2, 3        | Request alignment with EU-funded governance reforms; emphasize human rights, privacy, and cybersecurity considerations.   |
| International Telecommunication Union (ITU)           | Components 2, 3       | Recommend compliance with international ICT standards; suggest training for national regulators.  |
| Telecom Operators (Orange Liberia, Lonestar Cell MTN) | Components 2, 3       | Request public-private partnership models; seek incentives for rural network expansion; suggest infrastructure-sharing agreements.                                  |
| Internet Service Providers (ISPs)                     | Component 2, 4        | Recommend measures to improve internet affordability; request streamlined licensing processes.  |
| Technology Companies & Vendors                        | Component 5           | Request transparent procurement processes; suggest opportunities for local content development; propose long-term service contracts.                                |
| Banks & Financial Institutions                        | Components 3, 4, 5    | Request integration with mobile money platforms; suggest cybersecurity training for financial transactions.   |
| Chambers of Commerce & Business Associations          | Components 2, 3       | Recommend capacity-building programs for members; request favorable policies for digital business growth.   |
| NGOs and CBOs   | Component 1, 4        | Request targeted programs for vulnerable groups; suggest affordable community internet hubs; call for local language content.                                       |

|  |                    |  |
|--|--------------------|--|
| Academic & Research Institutions   | Component 3, 4     | Recommend inclusion of ICT curriculum updates; request research funding on digital transformation impacts.                                 |
| Media Houses   | Component 5        | Request timely project updates; suggest awareness campaigns; emphasize need for public access to information.                              |
| Professional Associations  | Component 3        | Request professional certification programs in ICT; suggest participation in developing project standards.                                 |
| ECOWAS Commission  | Components 2, 4    | Recommend regional policy harmonization; request data-sharing mechanisms for cross-border services.  |
| Mano River Union (MRU)   | Components 2, 3    | Suggest integration with regional digital infrastructure; request collaborative training programs.   |
| Rural Communities  | All                | Request affordable and reliable internet services; emphasize local training needs; highlight connectivity gaps.                            |
| Women and Girls (specialized female small entrepreneurs, home based workers, etc.) | Component 3, 4     | Suggest women-focused digital literacy programs; request access to devices; emphasize online safety.                                       |
| Persons with Disabilities (PWDs)   | Component 3, 4     | Request accessible digital platforms and assistive technologies; suggest inclusion in design consultations.                                |
| Low-Income Households  | Components 1, 3, 4 | Request affordable data packages; suggest installment plans for devices.   |
| Youth (especially unemployed or underemployed)                                     | Component 4        | Request digital skills training; suggest creation of online job platforms and innovation hubs.   |
| Older Persons  | Component 4        | Request simplified user interfaces; suggest community-based digital literacy sessions; highlight telehealth needs.                         |
| Landowners or Land Users along the Right of Way (ROW)                              | All                | Request fair compensation for land use; demand clear timelines for works; express concerns over property access and livelihood disruption. |
| Community Members near Construction Sites  | All                | Raise concerns about dust, noise, vibration, and temporary access restrictions; request advance notice of works.                           |
| Underserved Communities  | All                | Request priority access to new connectivity; stress affordability; suggest community internet hubs.  |
| Business Owners Affected by Construction   | Components 2, 3    | Request mitigation of access disruption to premises; seek compensation for lost income during works.                                       |
| Local Transport Operators  | Component 5        | Raise concerns about road closures or diversions; request scheduling to minimize disruption to transport services.                         |

|                                      |                 |   |
|--------------------------------------|-----------------|---|
| Fishing Communities                  | All             | Express concerns over underwater cable deployment affecting fishing grounds; request engagement on safe fishing zones.    |
| Utility Service Providers            | Component 5     | Request coordination to avoid disruption of electricity, water, or other utility services during works.                   |
| Local Government Authorities         | Component 5     | Request early coordination for permits; seek updates on works schedule; emphasize alignment with local development plans. |
| Educational Institutions             | Components 3, 4 | Require enhanced internet capacity; suggest training programs for teachers and students.                                  |
| Healthcare Facilities                | Components 3, 4 | Request reliable internet for telemedicine; highlight the need for uninterrupted power and service quality.               |
| Port and Coastal Facility Operators  | Component 5     | Raise navigational safety concerns during underwater cable installation; request coordination with maritime schedules.    |
| Telecommunication Operators and ISPs | Component 2     | Suggest infrastructure-sharing agreements; request incentives for rural network expansion.                                |
| Local Workers and Laborers           | Component 5     | Request fair employment opportunities; seek training for technical roles in project implementation.                       |

## 4.2 Proposed Project Strategy for Stakeholder Engagement

This plan ensures that stakeholders receive timely, clear, relevant, and accessible information, and are consulted in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination, or intimidation. Transparent engagement between WARDIP-SOP2 and project stakeholders is critical throughout the entire project lifecycle—from preparation and planning to implementation. As new stakeholders are identified during the project, they will also be incorporated into this plan.

Key factors influencing engagement with each stakeholder group include:

1. Priority level
2. Stakeholder expectations, project risks, and impacts
3. Specific locational and socio-economic vulnerabilities
4. Core principles: timeliness, transparency, accessibility, accountability, and participation

Stakeholders with high influence and those facing high impact will be kept informed, involved, and consulted throughout the project's duration. They will be engaged through decision-making bodies (i.e., a Steering Committee) and regularly updated via defined techniques and platforms in the stakeholder engagement strategy for this SEP. The following institutions have already been notified to serve on the **Steering Committee** for the entire duration of the project, unless otherwise communicated: MoPT; MFDP; CBL; IIC; LTA; CCL; New Cable Consortium; LRREN; EPA; MoGSP; MICAT; NIR; MoCI; MoE; Liberia ICT Student Union and Liberia Chamber of Commerce. The PIU will consider expanding or streamlining the SC into smaller working groups, depending on stakeholder interests, and multisectoral project impact.

Medium-influence stakeholders wield less decision-making authority than their High Influence counterparts, they remain vital participants in the project ecosystem. The engagement strategy work with these groups will involve structured opportunities for their meaningful participation, ensuring that their perspectives inform project development and execution through continuous consultations, transparent information sharing, and responsive feedback mechanisms.

Low Influence Stakeholders such as grassroots actors, members of the host community, vulnerable populations, and local associations, these stakeholders will be engaged through tailored engagement techniques (outlined in the Communication Strategy) to ensure inclusive representation, particularly for marginalised subgroups. The strategy will prioritize their continuous involvement, satisfaction, and transparent communication throughout all phases of the project.

## 4.3 Proposed Strategy for Engagement of Disadvantaged and Vulnerable Groups

The project will adopt a citizen-oriented design across all components. It will (i) co-create priority interventions with users through structured consultations (women, youth, persons with disabilities, MSMEs, academia, civil society), guided by a Stakeholder Engagement Plan (SEP), (ii) operate a multi-channel feedback system (e.g., GRM, USSD/SMS short codes, WhatsApp bot, in-person clinics) in French/English and local languages, (iii) publish feedback dashboards (quarterly) showing issues raised and resolved, and (iv) integrate learning loops so feedback systematically informs annual work plans. Effectiveness will be tracked through citizen engagement indicators in the results framework, including satisfaction with project-supported services and responsiveness of the grievance process.

Overall, the principle of inclusiveness will guide the stakeholder engagements, particularly with respect to vulnerable individuals and groups. The project will make reasonable provisions to cater for representation from remote areas, persons with limited physical abilities, vision, hearing and speech impairment amongst others, and those with insufficient financial and transportation means to attend public meetings scheduled by the Project. In cases where vulnerable status may lead to people's reluctance or physical incapacity to participate in large-scale community meetings, the project will hold separate small group discussions with them at an easily accessible venue. This way, the project will reach out to groups who, under normal circumstances, may be insufficiently represented at general community gatherings. Some strategies to be adopted to reach out to these groups include:

- Identifying leaders of vulnerable and marginalized groups to reach out to these groups
- Maintaining information flow through existing disability associations and maintaining a database of marginalized groups
- Including disability in the establishment of beneficiary selection and targeting criteria
- Ensuring easy and safe access to subproject sites and training venues
- Providing disability-friendly training materials
- Ensuring GBV codes of conduct and monitoring mechanisms are in place
- Leveraging existing social protection projects which include vulnerable populations and use their systems to identify and engage them
- Engaging community leaders, CSOs and NGOs working with vulnerable groups

#### **4.4 Stakeholder Engagement Plan**

This SEP is designed to establish an effective platform for productive interaction with the potentially affected parties and others with interest in the implementation outcome of the Project. Meaningful stakeholder engagement throughout the project cycle will:

- i. Inform stakeholders about project objectives, scope and manage expectations
- ii. Solicit feedback to inform project design, implementation, monitoring and evaluation
- iii. Assess and mitigate project environmental and social risks
- iv. Enhance project outcomes and benefits
- v. Build constituencies and collaboration
- vi. Disseminate project information/ materials
- vii. Receive and address project-related grievances

Adequate stakeholder consultations will require effective timing and advanced planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, the Project Implementation Partners will adopt different methods and techniques based on assessments of stakeholder needs to date.

The project will utilize various methods of engagement that will be used as part of its continuous interactions with different groups. The format of every consultation activity will meet general requirements regarding accessibility, i.e. should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization. Activities should also meet cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, women, and other vulnerable individuals, and proactive, meaningful consultations. A strategy for engagement throughout the various project phases is outlined in **Table 4.3** below (**Stakeholder Engagement Plan**)

The responsibility of implementing the SEP will be with the MoPT, through the PIU. The MoPT will appoint experienced personnel or specialized NGOs, where needed, responsible for implementing and reporting feedback from stakeholder engagement activities.

The Environmental and Social Safeguard Specialists at the PIU and the Project Coordinator shall directly implement, coordinate, monitor and report on the SEP, and ensure quality periodic assessments of its effectiveness. These staff of the PIU and coordinator shall be responsible for timely updating and the successful implementation of the SEP.

**Table 4-3: Stakeholder Engagement Plan**

|                                     |  |  |  |   |  |  |
|-------------------------------------|--|--|--|---|--|--|
| <p>Preparation and Design Phase</p> | <p>Project concept, design, benefits and impact (ESCP, ESMP, LMP, RAP, ESMP-sub projects, and other plans, assessments and forecasts)<br/> Mode of selection of subprojects, benefits, impact (ESIA)<br/> Scope of the potential impacts and mitigation measures<br/> Land acquisition process, if required<br/> Resettlement measures<br/> Grievance redress mechanism, GBV/SEAH risks and mitigation, prevention, response and accountability plan</p> | <ul style="list-style-type: none"> <li>● Community members</li> <li>● Vulnerable and disadvantaged groups Business owners</li> <li>● Traditional leaders</li> <li>● NGOs/CSOs</li> <li>● Underserved communities</li> <li>● Users of ICT/Internet services</li> <li>● Media</li> </ul> | <p>Letters to village leaders; traditional notifications; disclosure of local project documentation in a culturally appropriate and accessible manner; community meetings; outreach activities; IEC materials including banners, signposts and flyers, other local communication<br/> Sector-specific forums</p> | <p>Village, District and County level</p> | <p>Monthly six months following project effectiveness, followed by quarterly, for sharing updates and get feedback</p> | <p>PIU E&amp;S Consultants, local NGO providing legal and other services</p> |
|-------------------------------------|--|--|--|---|--|--|

|  |  |  |  |                                    |  |  |
|--|--|--|--|------------------------------------|--|--|
|  | Land acquisition process, where required (including assistance in gathering official documents for authorized land uses, compensation rates, methodology compensation packages, etc.)<br>Resettlement and livelihood restoration options<br>Project scope, rationale and E&S principles<br>GRM information and access points and procedure | <ul style="list-style-type: none"> <li>• Traditional leaders</li> <li>• People who have lost land or livelihoods directly affected</li> <li>• Community-Based NGOs</li> <li>• Local dispute settlement and justice mechanisms, including courts</li> </ul> | Meetings, Joint Public/community meetings with PAPs having land or livelihoods affected by project activities  | Village, District and County level | As needed<br><br>Monthly   | PIU's E&S Team   |
|  | Project scope and potential benefits and impacts and related mitigation measures.<br>Land and livelihood loss options and process, where required<br>Project E&S principles, standards, and plans<br>GRM information and process   | <ul style="list-style-type: none"> <li>• Ministry of Finance</li> <li>• Ministry of Telecommunication and Post</li> <li>• Ministry of Agriculture</li> <li>• Ministry of Information</li> <li>• Office of the State Governor</li> </ul>                    | Correspondence by phone/email; one-on-one formal meetings; roundtable discussions, workshops<br>IEC materials such as project information sheets, Sector-specific forums |                                    | One large consultative meeting at each ESIA milestone and thereafter as needed<br><br>Bi-annual forum meetings | Project Coordinator (PC), Social Safeguard Specialist, Communication Officer |

|  |   |   |   |  |   |  |
|--|---|---|---|--|---|--|
|  |   |   |   |  |   |  |
|  | Present the final ESIA, ESMP, RAP (if required) and related plans for comments and feedback | <ul style="list-style-type: none"> <li>• Community members</li> <li>• Business owners</li> <li>• Users of ICT/Internet services</li> <li>• NGOs/CSOs</li> <li>• Traditional leaders</li> </ul> Underserved communities, vulnerable groups and disadvantaged populations<br>Media        | Public hearings, consultation meeting and focused group discussions                           |  | Once when final ESA and related plans are available | E&S Specialists. Communication Officer |
|  | Present the final ESIA, ESMP, RAP (if required) and related plans                           | <ul style="list-style-type: none"> <li>• Office of the State Governor</li> <li>• Ministry of Finance, Ministry of Telecommunication and Post, Ministry of Agriculture</li> <li>• Ministry of Information</li> <li>• Traditional leaders</li> <li>• Community-based NGOs/CSOs</li> </ul> | Workshops, project social media communication (virtual meetings), In-person advocacy meetings |  | Once when final ESA and related plans are available |  |

|   |  |  |  |   |  |  |
|---|--|--|--|---|--|--|
| <b>Implementation Phase (Operation and Maintenance)</b> | <p>Construction Contractors Environmental and Social Management Plans (C-ESMPs) and sub-project) and site-specific ESMPs for comments and feedback<br/>Project updates<br/>Rapid response protocol for urgent utility-related issues<br/>Sensitization on risks accrued from labour influx caused by construction, available mitigation (response and accountability) measures and GRM<br/>SEP effectiveness (including community and civil society monitoring)<br/>Capacity building plan</p> | <ul style="list-style-type: none"> <li>• Community members</li> <li>• Business owners</li> <li>• Users of ICT/Internet services</li> <li>• Utility providers</li> <li>• Local government and authorities (e.g., Office of the Superintendent and the Office of the Assistant Superintendent for Development at the county and district levels, utility suppliers)</li> <li>• Local NGOs/CSOs</li> <li>• Service providers in health and education</li> <li>• Traditional leaders</li> <li>• Underserved communities and vulnerable groups</li> </ul> | <p>Multistakeholder forums chaired by local authorities and meetings, Focus group discussions with women, youth, and children, PWDs, Older persons' societies, etc.), education and health service providers (digital integration), etc. GRM banners, signposts and flyers, Training and orientations sessions</p> | <p>Village, district and county levels</p>                      | <p>Monthly forum meetings<br/><br/>As needed</p> | <p>Project Coordinator, Project Engineer, E&amp;S Specialists, Communication Officer, local NGOs (for community/ village sessions)</p> |
|   | <p>Construction Contractors' Environmental and Social Management Plans (C-ESMPs), Occupational Health and Safety Plan Emergency preparedness and response<br/>Project Monitoring and safeguard compliance report</p>   | <ul style="list-style-type: none"> <li>• Office of the State Governor</li> <li>• Ministry of Finance</li> <li>• Ministry of Telecommunication and Post</li> <li>• Ministry of Information</li> <li>• Traditional leaders, Community-based NGOs</li> </ul>  | <p>Official websites, stakeholder workshops, projects, social media communication</p>  | <p>District and County-level in-person and virtual meetings</p> | <p>As needed</p>                                 | <p>Project Coordinator, Project Engineer, Environmental and Social Safeguard Specialists. Communication Officer</p>                    |

|                         |  |  |   |   |   |   |
|-------------------------|--|--|---|---|---|---|
|                         | <ul style="list-style-type: none"> <li>• Project updates including key milestones and any changes in project design, and monitoring results from the ESMPs</li> <li>• Community Health and safety impacts and mitigation measures</li> <li>• Construction related labor safety measures</li> <li>• Ongoing consultations on acquisition and resettlement and E&amp;S compliance</li> <li>• Updates on Contractors' activities, hiring preferences, job and business opportunities, training opportunities etc.</li> <li>• Update on resettlement and livelihood rehabilitation</li> <li>• Updates on training programs</li> <li>• Digital economy</li> </ul> | <p>Project affected persons and families, vulnerable and/or disadvantaged groups, and businesses identified during planning phase and during implementation</p> <p>Private Sector actors (telecom operators, digital startups, digital service providers, and hardware vendors)</p> <p>Media</p> | <p>Face-to-face meetings, Joint public/ community meetings with PAPs</p> <p>Community/ beneficiary Perception / satisfaction surveys – annually</p> <p>Round-table discussions, sectoral consultation forums, workshops</p> | <p>Village District and county-level meetings and surveys/ audit</p> <p>District and County level</p> | <p>Monthly meetings and annual surveys</p> <p>Quarterly roundtables</p> | <p>E&amp;S Specialists, Grievance Redress Committee. Communication Officer, Communication Officer</p> |
| <b>Completion Phase</b> | Project results  | All stakeholders   | Institutional completion reports  |   | Once, towards project closing   | Communication officer, E&S Specialist representatives of relevant government agencies                 |

In implementing the above plan, the following guidelines will also be followed in all engagement activities on related to **SEA/SH and GBV, 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.

Additional measures would be taken if consultations have minors present.

#### 4.5 Information Disclosure Strategy

**Table 4-4: Information Disclosure Strategy**

| Project stage             | List of information to be disclosed | Method proposed  | Frequency  | Target Stakeholders                        | Duty Bearer                         | Proposed Time Schedule                  |
|---------------------------|-------------------------------------|--|--|--|-------------------------------------|---|
| Preparation/ Design phase | Project Appraisal Document (PAD)    | Official websites                                      | Entire Project duration  | National, County and District stakeholders | WB, MoPT, MoF, PIU                  | Within a month of project effectiveness |
|                           | ESMF, SEP                           | Newspaper publications                                 | Once in 2 national daily newspapers                                  | National, County and District stakeholders | WB, MoPT, MoF, PIU, Safeguards Team |   |
|                           |                                     | Workshops  | Geographical area of influence should inform the number of workshops | County and District stakeholders           | MoPT, MoF, PIU, Safeguards Team     |   |
|                           |                                     | Consultation with affected parties in community spaces | Once in each project community                                       | Community Level stakeholders               | MoPT, MoF, PIU, Safeguards Team     |   |

| Project stage               | List of information to be disclosed  | Method proposed  | Frequency  | Target Stakeholders  | Duty Bearer                     | Proposed Time Schedule |
|-----------------------------|--|--|--|--|---------------------------------|------------------------|
|                             |  | Distribution of printed documents in relevant institution  | Annually at county, district and community level offices, community centers, etc | National, County, District and Community level stakeholders                                    | MoPT, MoF, PIU, Safeguards Team |                        |
| <b>Implementation Phase</b> | Project design and implementation  | Project inception stakeholder meetings   | Once at the National, County, District and Community levels                      | Interested parties, Vulnerable groups, Project staff, beneficiary communities                  | PIU                             | Monthly scheduling     |
|                             | Project progress reports   | Annual/mid-year project stakeholder meetings<br>Online publication   | Once or twice a year   | Beneficiary communities<br>Partner institutions (government and private)<br>Interested parties | MoPT, MoF, PIU                  |                        |
|                             | Communication of the capacity-building programme   | Community safe spaces, Town halls, Newspaper publications, Radio adverts   | When needed  | Qualified project beneficiaries and vulnerable groups  | MoPT, MoF, PIU                  |                        |
|                             | Sensitisation on Digital start-up Fund   | Traditional and social media, town(hall) accouchements   | When needed  | Qualified project beneficiaries and vulnerable groups  | MoPT, MoF, PIU                  |                        |
|                             | ESMPs, LMP, Occupational Health and Safety Plan, RAPs/ARAPs, GRM and emergency preparedness and response<br>Project Monitoring and safeguard compliance report | Publication on official websites<br>Community meetings, notice boards, etc.<br>Face-to-face Meetings, Individual outreach to PAPs as needed<br>Trainings/workshops (separate meetings specifically for | Entire project Duration  | National, county, district, and community level stakeholders                                   | MoPT, MoF, PIU, Safeguard team  |                        |

| Project stage           | List of information to be disclosed  | Method proposed   | Frequency           | Target Stakeholders                                    | Duty Bearer                      | Proposed Time Schedule              |
|-------------------------|--|---|---------------------|--|----------------------------------|-------------------------------------|
|                         |  | women and vulnerable as needed)   |                     |  |                                  |                                     |
|                         | Safety and health survey at project sites and beneficiary establishment                                      | Community safe spaces, community halls  | Project communities | Beneficiary communities and institutions               | PIU                              |                                     |
|                         | Annual Sector Performance reports<br>Environmental and Social Audit reports<br>Updates on project activities | Notice boards of National, local and community government   | When needed         | National, county, district, and community stakeholders | MoPT, MoF, PIU, local government |                                     |
| <b>Completion Phase</b> | Project Completion Report  | Publication on website<br>Hard copies distributed at meetings, Hard copies submitted to selected government offices | When needed         | All Stakeholders                                       | MoPT, MoF, PIU,                  | 40 days before project closing date |

## **4.6 Targeted Engagement of Special Groups**

Special considerations will be given to certain target groups, for promoting greater institutional development, transparency, programmatic relevance, and uptake of project benefits and minimization of its adverse impacts. These include:

### **4.6.1 Research Institutions**

The project will establish academic partnerships to integrate evidence-based approaches into the digitalization project. We will engage research institutions through:

1. Joint research initiatives on digital inclusion barriers
2. Data-sharing agreements for impact studies
3. Guest lectures by project team at academic institutions

A dedicated research coordinator will facilitate regular knowledge exchanges between implementation teams and academia. Institutions will be invited to review project methodologies and contribute white papers on emerging technologies. Findings from collaborative research will directly inform project adaptations, with credit given for academic contributions in the project.

### **4.6.2 Women and Girls**

Gender inclusion is embedded across all components of the project, with measures to expand women's participation in digital skills development, entrepreneurship, and leadership roles in the digital economy. Targeted outreach, mentorship, and flexible training formats will help reduce barriers such as caregiving responsibilities and online safety concerns, while dedicated entrepreneurship networks will connect women to resources and markets.

Tailored approaches for inclusive participation of women-led community groups and other vulnerable groups will be specifically implemented throughout the project implementation. Strategies include:

1. Conduct of women-only consultation sessions using female as facilitators
2. Deployment mobile outreach teams to engage homebound individuals
3. Partnership with women's collectives to deliver targeted training programs on women's digital inclusion and safe access.
4. Establishment of anonymous reporting options for sensitive concerns within the GRM.

Engagement will occur at times/locations convenient for female caregivers, with childcare support provided. Findings will directly inform people about accessibility features of digital services. Monitoring will track participation rates disaggregated by gender, disability, and socioeconomic status to ensure equitable inclusion.

An inclusive public participation effort will be pursued through multiple accessible channels, including digital platforms (project website, social media) and traditional methods (community meetings, radio spots). A multilingual public information campaign will explain project benefits and solicit feedback. The project will hold monthly virtual town halls with project teams and identify and engage local digital ambassador volunteers to bridge technology gaps in project communities. All public input will be systematically logged, analyzed, and addressed in project adjustments. Transparent reporting back to communities will demonstrate how public views shape implementation. Special attention will be given to reaching digitally excluded groups particular women and girls, through partnerships with community organizations to raise awareness and boost financial inclusion.

During Resettlement Action Planning, should the need arise, affected women or women-headed households would be involved through dedicated consultations for the preparation, review, implementation, and monitoring of the RAP, to ensure that their perspectives are integrated into the design of resettlement sites, housing, basic social infrastructure, and livelihood restoration programs. The program will ensure clear and early communication on consultations designed specifically to engage women and girls through both traditional and non-traditional channels of communication used by women (e.g., through local teachers, healthcare providers, etc.), the location of the resettlement area, and disclosure details of proposed compensation plans to all households, especially single-mother and female-headed households.

#### **4.6.3 Development Partners (UN Agencies, ITC Agencies)**

The SEP will institutionalize structured collaboration with development partners through quarterly coordination forums and technical working groups to align digital transformation efforts. A partnership focal point will facilitate ongoing dialogue, share project milestones, and solicit technical inputs. Development partners will be engaged through:

- Biannual strategy retreats to harmonize interventions
- Co-creation sessions for scalable digital solutions
- Joint monitoring of key performance indicators
- Knowledge exchange platforms for best practices

Their expertise will inform the project design and implementation, featuring a systematic feedback mechanism to incorporate recommendations. Regular progress briefings will illustrate how partner contributions enhance project outcomes, ensuring mutual accountability in achieving digital inclusion goals.

#### **4.5.4 Media and the General Public**

Proactive media relations through regular press briefings, exclusive interviews with project leadership, and curated site visits to showcase implementation progress will be established. A dedicated media desk will provide timely responses to inquiries and distribute press kits with project factsheets in multiple formats (print, digital, broadcast-ready clips). Priority will be given to:

1. Quarterly media roundtables with technical experts
2. An online media portal with downloadable resources
3. Training sessions for journalists on digital transformation concepts
4. Opportunities for investigative reporters to access verified project data

An inclusive public participation effort will be pursued through multiple accessible channels, including digital platforms (project website, social media) and traditional methods (community meetings, radio spots). A multilingual public information campaign will explain project benefits and solicit feedback. The project will hold monthly virtual town halls with project teams and identify and engage local digital ambassador volunteers to bridge technology gaps in project communities. All public input will be systematically logged, analyzed, and addressed in project adjustments. Transparent reporting back to communities will demonstrate how public views shape implementation. Special attention will be given to reaching digitally excluded groups through partnerships with community organisations.

#### **4.7 Communication Strategy**

A communication strategy will be developed to guide project communication activities, detailing stakeholders, messages and information, channels of delivery, and branding guidelines. The strategy

will include details of regional-national-local knowledge forums and means of communication to and from the Regional Project Steering Committee.

#### 4.7.1 Printed Communications

Printed communication will be shared regularly on a monthly and semi-annually basis with all stakeholders, based on their preferences and role in the project.

#### 4.7.2 Electronic Communications, Online and Social Media Platforms

There will be regular (daily, weekly, monthly) releases of project updates and information via electronic and social media platforms. The Communication Officer will coordinate this arrangement to ensure coherent delivery of information.

### 4.8 Proposed Strategy for Information Disclosure

A central repository for all disclosed information will be maintained on the Project Implementing Agency’s website, while partner agencies will publish details of their respective components on their own sites. Additional communication channels such as print media, radio, television, public events, brochures, flyers, and social media will also be utilized.

### 4.9 Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and GRM, and on the project’s overall implementation progress.

#### 4.10 Resources and responsibilities for implementing stakeholder engagement activities

The project will allocate sufficient funds to implement the SEP Funding and resourcing for the SEP implementation will be included as part of project cost under Component 5 which would fund Technical Assistance (TA) and communication strategies planned to be carried out on the project at various levels. The budget for implementing activities under the SEP is estimated at **\$390,000 (US Dollars Three Hundred and Ninety Thousand)**.

Below is an estimated plan for the five years of implementation.

**Table 4-5: SEP Estimated Budget**

| No       | Budget Category   | Quantity | Unit Cost | No. of Times During Project       | Total Estimated Cost (\$ USD) | Remarks  |
|----------|---|----------|-----------|-----------------------------------|-------------------------------|--|
| <b>1</b> | <b>Staff salaries and related expenses (travel costs for staff)</b>                     |          |           |                                   |                               |  |
| a        | Staff (Environmental, and Social and GBV Specialists)                                   | 2        | -         | Throughout project implementation | -                             | Budgeted under project management and implementation costs |
| <b>2</b> | <b>Training</b>   |          |           |                                   |                               |  |
| a        | Technical assistance (Technology-facilitated SEAH/ GBV and digital economy trainings by | 15       | Lumpsum   | Quarterly                         | 60,000                        |  |

| No       | Budget Category  | Quantity | Unit Cost | No. of Times During Project   | Total Estimated Cost (\$ USD) | Remarks   |
|----------|--|----------|-----------|---|-------------------------------|---|
|          | experts and TVET institutions)   |          |           |   |                               |   |
| b        | E&S (SEP) Training   | 2        | -         | Twice annually, two years into effectiveness                                    | -                             | Conducted by Center of Excellence/ WB team  |
| c        | GRM (training of GRM (sub) committees (all levels), Operators, Focal Points, etc.                        |          | Lumpsum   | Two GRM trainings annually in first two years of implementation with refreshers | 20,000                        |   |
| d        | Journalists and media groups   | 5        | Lumpsum   | One large consultation each year  | 20,000                        |   |
| <b>3</b> | <b>Events</b>  |          |           |   |                               |   |
| a        | Community meetings (with local leaders, GRCs, directly impacted and/or disadvantaged, vulnerable groups) | 60       | Lumpsum   | Throughout project lifecycle  | 100,000                       | Committees to be set up prior to meetings, to facilitate community inclusion and inputs |
| b        | Town meetings for awareness-raising  | 20       | Lumpsum   | Throughout project lifecycle  | 20,000                        | Starting with Buchanan Town   |
| c        | Stakeholder consultative Workshops (all stakeholder groups)  | 10       | Lumpsum   | Once every quarter, different groups  | 75,000                        | Held at different levels with different groups of stakeholders                          |
| d        | Disclosure events (ESIA, other assessments)  |          | Lumpsum   |   | 45,000                        |   |
| <b>4</b> | <b>Communication and IEC production and dissemination</b>  |          |           |   |                               |   |
| a        | GRM-related content (posters, flyers, banners, signboards, complaint boxes, etc.)                        | 1        | Lumpsum   |   | 10,000                        | Includes cost of updating any GRM or referral related information                       |
| b        | Radio messaging  |          | Lumpsum   |   | 20,000                        | Communication strategy to determine messaging content, audience and intervals           |
| <b>5</b> | <b>Surveys/ audit</b>  |          |           |   |                               |   |
| a        | SEP effectiveness survey   |          | Lumpsum   | Once  | 15,000                        | Includes assessment of project GRM and  |

| No                           | Budget Category                           | Quantity  | Unit Cost | No. of Times During Project | Total Estimated Cost (\$ USD) | Remarks  |
|------------------------------|---|-----------|-----------|-----------------------------|-------------------------------|--|
|                              |   |           |           |                             |                               | feedback channels  |
| b                            | Stakeholder (re) mapping for sub-projects | As needed | Lumpsum   |                             | 5,000                         | Budget to be used to expand SEP based on specific sub-projects' requirements |
| <b>Total proposed budget</b> |   |           |           |                             | <b>USD 390,000</b>            |  |

## 5.0 GRIEVANCE MECHANISM

### 5.1 Objectives of Project Grievance Redressal Mechanism (GRM)

The project Grievance Redressal Mechanism acts as a structured framework designed to ensure the prompt, fair, and satisfactory resolution of project-related concerns for all stakeholders. As a fundamental component of the Stakeholder Engagement Process, the GRM establishes formal channels for voicing and addressing issues, while promoting accountability and constructive dialogue throughout project implementation.

The GRM seeks to provide:

1. A transparent and impartial process that delivers fair and sustainable resolutions
2. Enhanced stakeholder confidence through verifiable due process
3. Proactive conflict prevention and mitigation measures
4. Strengthened community relations through responsive engagement

### 5.2 Guiding Principles

An effective grievance mechanism is guided by the following principles:

1. Legitimacy: Maintain independent governance free from interference
2. Accessibility: Overcome barriers like language, literacy, or fear of reprisal
3. Predictability: Establish clear procedures, timelines, and outcome monitoring
4. Equity: Ensure fair access to information and expertise
5. Rights-compliance: Align outcomes with international human rights standards
6. Transparency: Disclose process details and outcomes, particularly for non-state mechanisms.

### 5.3 Elements of the GRM

An effective grievance resolution system is built on multiple interconnected components designed to ensure fairness, transparency, and accountability. Elements of an effective grievance mechanism include:

1. Complaint Intake Process: The GM should establish clear and accessible channels for submitting grievances while formally acknowledging receipt to assure stakeholders that their concerns are being addressed.
2. Case Assessment: enables a determination of whether a grievance falls within the mechanism's scope, ensuring resources are allocated appropriately.

3. **Comprehensive Review:** The grievance is assessed to understand its nuances, gather relevant perspectives, and explore potential pathways for resolution.
4. **Resolution Options:** The mechanism must offer various resolution approaches tailored to the nature of the dispute. For less complex issues, internal decision-making by designated officials, guided by predefined standards and an established appeals process, may be sufficient. In cases where a voluntary agreement proves elusive, third-party mediation or arbitration provides an impartial way forward.
5. **Ongoing Management:** To maintain trust and accountability, ongoing tracking and reporting ensure that grievances are monitored from submission to resolution, with regular updates provided to the affected communities.
6. **Feedback mechanisms** allow for the continuous refinement of the process based on stakeholder input.
7. **Continuous Improvement:** Ultimately, the mechanism acts as a tool for organizational learning, pinpointing recurring issues and systemic gaps to guide policy adjustments and prevent future disputes. By incorporating these elements, the system not only addresses individual grievances but also strengthens relationships and fosters long-term conflict prevention.

#### 5.4 Levels of the Grievance Mechanism

Apart from the project GRM based at the PIU, the project will have a structure for responding to grievances. These are depicted in Table 5.1 below:

**Table 5-1: Grievance Redress Structure**

| Table 5-1: Grievance Redress Structure |   |   |
|--|---|---|
| Level 1: Community Level               | Community Grievance Committee (CGC) comprising Town/Clan Chiefs, Community Development Committees (CDCs), Women’s and Youth Representatives, and Project Community Focal Person.  | <ul style="list-style-type: none"> <li>• First point of contact for receiving complaints.</li> <li>• Builds on existing traditional and local dispute resolution systems (e.g., Town Chiefs, elders, women’s and youth groups).</li> <li>• Grievance lodged verbally or in writing to Community Focal Person or Town Chief.</li> <li>• Recorded in Community Grievance Logbook and acknowledged within 3 working days.</li> <li>• The CGC reviews the issue, consults parties, and agrees on resolution within 7–10 working days.</li> <li>• If unresolved, complaint is referred to the District Level within 5 working days.</li> </ul> |
| Level 2: District Level                | District Grievance Committee (DGC) chaired by District Commissioner or Assistant Superintendent, including District Environmental Officer/EPA Representative, Project District Focal Point, Local Leaders, Women/Youth Representatives, and CSO Representative. | <ul style="list-style-type: none"> <li>• Handles cases unresolved at the community level.</li> <li>• Utilizes existing District Administrative Structures under the Ministry of Internal Affairs.</li> <li>• Complaint acknowledged within 3 working days.</li> <li>• DGC investigates, conducts hearings and site visits (if necessary).</li> <li>• Resolution reached and recorded in the District Grievance Register.</li> <li>• If unresolved, complainant may appeal to the National Level within 10 working days.</li> </ul>  |

|                         |  |  |
|-------------------------|--|--|
| Level 3: National Level | National Grievance Redress Committee (NGRC) under the Project Management Unit (PMU), with representation from relevant ministries (MIA, EPA, sector agencies) and National Steering Committee (NSC). | <ul style="list-style-type: none"> <li>• Addresses complex, policy-level, or unresolved grievances.</li> <li>• Complaints may come directly from Districts or be submitted via project channels (website, hotline, email, physical submission).</li> <li>• Acknowledgment within 5 working days.</li> <li>• NGRC reviews documentation, conducts hearings, and may engage independent mediators.</li> <li>• Final resolution communicated to complainant and lower levels.</li> <li>• Unresolved grievances may proceed to formal judicial system under Liberian law.</li> </ul> |
|-------------------------|--|--|

The existence of this GRM structure does not preclude aggrieved parties from resorting to the in-country judicial system (Courts) to resolve grievances directly or in the event they are not satisfied with the outcomes of the project Grievance Redress Mechanisms. A person dissatisfied with the outcome of the Grievances at the Community/Project level, PIU/Regional level or National/Higher level could also resort to Alternative Dispute Resolution or go to Court to seek legal remedy. Both a PIU-based and local-level grievance mechanisms will be established *within three months* of the project's commencement to address non-sensitive and minor complaints. However, for sensitive cases involving sexual exploitation, abuse, or harassment (SEAH/GBV), specialised reporting channels will be created with clear protocols (see section 5.7 below). These will include carefully vetted local contact persons and confidential entry points, identified through consultations with women and girls conducted in safe, gender-segregated settings. This dual approach ensures cultural appropriateness while maintaining safeguards for vulnerable groups.

The project acknowledges and respects the existing traditional conflict resolution systems within local communities. Many disputes, particularly those involving customary issues such as land boundaries or inheritance, can often be effectively resolved through these established mechanisms without project or government intervention, frequently with the involvement of family structures, village elders, or traditional leaders.

### 5.5 Grievance Management Procedures

Figure 2 below depicts the general stages for the GRM, and Figure 3 provides the main channel through which the GRM would take complaints or feedback and provide follow-up support.

**Figure 2: Stages in GRM case handling**



**Figure 3: GRM Channels**



## 5.6 General Complaints Handling Process

The following standard procedures will be used in responding to complaints in the project:

### Step 1: Receive and Register a Complaint

The project will enable aggrieved stakeholders (“complainants”) to communicate their grievances through a variety of channels (e.g. Toll-free line phone, letter, walk-in, email, website, meeting, etc.), which will allow people to inform the project about concerns directly and, if necessary, anonymously or through third parties shown in Figure 10.2. Complaints will

be written, ideally, but if received verbally, the project contact person will ensure written documentation is made and that the complaint is dated and recorded.

The project will ensure that the procedures are effective, convenient, culturally appropriate, simple to understand, and easy to use. The grievance register will contain the information outlined in the Box 1 below. See Annex 2 for a sample of the Grievance Register/Log. The main requirements of complaint registers to be maintained on site are depicted in Figure 4 below.

#### Figure 4: Complaints Register Requirements

|  |
|--|
| The complaint register will include  |
| Unique reference number  |
| Date of the complaint  |
| Name of the complaints (in case of non-anonymous enquiries and grievances)   |
| Gender, location and address of the complainant(s)   |
| Content of the complaint   |
| Identification of parties responsible for the addressing and resolution of the issue, Dates when the investigation of the complaint was initiated and completed  |
| Findings of the investigation  |
| Information on proposed corrective actions to be sent to the initiating party (unless it was anonymous) and the date of the response sent on measures of redress |
| Deadlines for internal actions required from Project's staff   |
| Indication of whether a statement of satisfaction was received from the person who lodged the grievance, or a reason for non-resolution of the grievance         |
| The date of resolution   |
| Any outstanding actions for non-closed grievances  |

#### Step 2: Screening and Processing Complaints

The project will assign focal points at different levels for receiving and registering complaints from stakeholders and affected persons. The Environmental and Social Specialists for the project will have overall responsibility for tracking and following up on issues and complaints raised. They will serve as focal points at the national level. After receiving and registering the complaint, the focal points will establish the eligibility of the complaint received. The following criteria will be used to assess and verify eligibility:

- i. The complainant is identifiable and has provided a name and contact details.
- ii. The complainant is affected by the project.
- iii. The complaint has a direct relationship to the project. Does the complaint indicate that the programme has caused a negative economic, social, or environmental impact on the complainant or has the potential to cause such an impact? Does the complaint specify what kind of impact has occurred or may occur, and how the programme has caused or may cause that impact?
- iv. The issues raised in the complaint fall within the scope of the issues that the GM is mandated to address.

#### Step 3: Establish Grievance Category

As a result of the screening (see Annex 3 for a sample of the Grievance Screening and Investigation Sheet), the grievance will be assigned to one of the four categories outlined in the Table 5.2 below.

**Table 5-2: Category of Grievance**

| Category   | Description  | Required Action   |
|------------|--|---|
| Category 1 | Complaints that are not related to the project   | The project will confirm receipt and discuss with the complainant to understand the issue before responding. If it is confirmed that the complaint is not related to the project, the complainant will be referred to the appropriate project or institution.   |
| Category 2 | Queries, comments, and suggestions   | The project will confirm receipt, and the relevant staff will assist in responding to the queries, comments and suggestions.  |
| Category 3 | Complaints and concerns which are not criminal or do not require the involvement of police   | Complaints may be straightforward and can often be resolved on first contact. If this is not the case, then the complaint may require investigation. The investigation includes gathering documents, proof, and facts, as well as clarifying background information to verify the circumstances surrounding the grievance. It will involve coordinating with appropriate authorities, making decisions, proposing resolutions, and implementing agreed actions. |
| Category 4 | Complaints and concerns that relate to cases of a criminal nature and will require investigation or intervention by the police or other law enforcement authorities, such as sexual abuse. | This will be escalated to the police without any delay. If grievances include more than one issue, the Grievance Officer will ensure that all issues are reviewed and addressed simultaneously to avoid any delays.   |

**Step 4: Assess the Complaint**

If the initial assessment establishes the eligibility of the complaint to be pursued, a further assessment will be undertaken to determine the complaint's seriousness. During the assessment, the project gathers information about the case, key issues, and concerns and helps determine whether and how the complaint might be resolved. The project will undertake the following:

- i. Identify the parties involved.
- ii. Clarify issues and concerns raised by the complaint
- iii. Gather the views of other stakeholders, including those of the project
- iv. Measure/classify impact and urgency in high, medium, or low. Assessing the seriousness of a complaint is not easy, as it could be subject to biases. The seriousness of a complaint is linked to who in the project needs to know about it and

- o whether senior management is advised. Criteria should be established and could include the following:
  - o Severity of the problem,
  - o Potential impact on the well-being and safety of an individual or group,
  - o Potential impact on the project and
  - o Public profile of the issue.
- v. Determine initial options that parties have considered and explore various approaches for settlement.

Based on the risk-urgency combinations, a composite score will be produced (Table 5.3 below). Composite scores are generated by cross-multiplying the individual risk and urgency scores.

**Table 5-3: Categorization of Grievances - Risk-Urgency Scores**

| Urgency (Ranking) | Risk (Ranking) |          |            |         |
|-------------------|----------------|----------|------------|---------|
|                   |                | High (3) | Medium (2) | Low (1) |
| High (3)          |                | 9        | 6          | 3       |
| Medium (2)        |                | 6        | 4          | 2       |
| Low (1)           |                | 3        | 2          | 1       |

A priority index will be developed based on the composite scores as follows:

- i. Priority 1: Score 9
- ii. Priority 2: Score 6
- iii. Priority 3: Scores 3 and 4
- iv. Priority 4: Score 2
- v. Priority 5: Score 1

Priority 1 is critical and accorded immediate attention as it will likely lead to loss of project funds, life, etc. On the other hand, priority 5 is not urgent, and the impact is low.

**Step 5: Formulate a Response**

Having completed the complaint assessment, a response will be formulated on how to proceed with the complaint. The response will be communicated to the complainant. The response will include the following elements:

- i. acceptance or rejection of the complaint;
- ii. reasons for acceptance or rejection;
- iii. next steps—where to forward the complaint;

- iv. a time frame, and
- v. (if accepted) Further documents or evidence are required for investigation, e.g., field investigations.

The response will consider the complainants’ views about the settlement process and provide a specific remedy. The response may suggest an approach for settling the issues or offer a preliminary settlement.

**Step 6: Corrective Actions, Follow-Up, and Closing a Grievance**

The complainant will be informed of the outcome if a grievance is resolved. Suppose a grievance is unresolved and escalated for consideration and resolution at another level. In that case, appropriate information will be provided to the complainant, including when the case will be passed to a higher level and when the outcome is expected.

The project will consider a closed grievance after an amicable resolution between the parties. In certain situations, however, the project may “close” a grievance under special circumstances, even if the complainant is unsatisfied with the outcome. Such situations, in which the project closes a grievance before a stakeholder is satisfied with the outcome, may arise if the complainant cannot substantiate the grievance or if there is an obvious speculative or fraudulent attempt. In such situations, all steps and efforts are taken to investigate the complaint before concluding. This information will be documented and communicated to the complainant without putting the lives of those who provided the information in danger.

It is, however, important to note that all project staff involved in handling grievances should not dismiss any grievance based on a hasty review and close off an investigation before the complainant has been notified and allowed to provide additional information. Consequently, a decision to close such grievances requires the endorsement of the project manager.

After the procedures, an internal report on each grievance, including recommendations, will be prepared and documented. Recommendations may be operational corrective actions or improvements to existing policies or procedures. A corrective action plan should be developed and implemented where possible and appropriate.

Sub-contractors should present a report to the contractors on completing the agreed action and closing the grievance. Contractors should prepare and submit quarterly reports on complaint handling and resolution to the PIU.

The register of all complaints lodged into the project, third-party implementers / contractors / clients’ Grievance Mechanism, as well as all information collected in the course of handling procedures, shall be duly filed and archived WARDIP-SOP2 Liberia project, third-party implementers/contractors/clients, ensuring restricted access and, where possible, deploying chain of custody measures.

**Table 5-4: Outline of Response Timelines**

| Activity   | Timeline   |
|--|--|
| Notification of receipt                                | Within 2 business days of receipt of the complaint |
| Screening for admissibility and preliminary assessment | Within 5 business days of receipt of a complaint   |

|                         |  |
|-------------------------|--|
| Notification of action  | Within 2 - 10 business days from receipt of the complaint depending on the type of complaint |
| Formulation of response | Within 3 - 20 business days of receipt of the complaint depending on the type of complaint   |

**5.7 Workers' Grievance Mechanism**

In accordance with the project’s Labour Management Procedures, WARDIP-SOP2 requires contractors to establish a Workers’ Grievance Redress Mechanism at the site level. This mechanism ensures that workers have a formal and structured process to raise concerns, with representation from the contractor, a representative of the supervising entity/team, and the workers themselves. To enhance awareness, workers will be briefed on the grievance redress procedures during induction and training sessions.

The mechanism will include multiple accessible channels for submitting grievances, such as comment/complaint forms, suggestion boxes, a dedicated email address, and a telephone hotline. Clear timeframes will be established for responding to and resolving complaints, ensuring timely action. A central grievance register will be maintained to record and track all complaints, along with their resolution status. A designated officer will be responsible for receiving, documenting, and managing the redress process to ensure accountability.

The Supervisory team/entity’s safeguards team will monitor the contractors’ implementation of the grievance mechanism, including the recording and resolution of complaints, and will report on progress in their monthly updates. Oversight of the entire process will be conducted by the PIU Social Safeguards Specialist and the Project Coordinator, ensuring adherence to established procedures and effective grievance management throughout the project lifecycle.

**5.8 World Bank’s Grievance Redress Service**

The Grievance Redress Service (GRS) enables individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has, or is likely to have, adverse effects on them, their community, or their environment. The GRS enhances the World Bank’s responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed. Any individual or community who believes that a World Bank-financed project has, or is likely to, adversely affect them may submit a complaint.

The GRS considers a complaint admissible when it:

- The complaint relates to a World Bank-supported project that is under preparation, active, or has been closed for less than 15 months;
- the complaint is submitted by individuals or communities affected by a World Bank-supported project or by their authorised representative and
- the complainant(s) allege that they have been or will be affected by the World Bank-supported project.

Complaints must be in writing and addressed to the GRS. The following methods can send them:

- online, access the online form,
- by emailing [grievances@worldbank.org](mailto:grievances@worldbank.org),
- by letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office.

Information to include in a complaint must

- identify the project subject of the complaint,
- clearly state the project's adverse impact(s),
- identify the individual(s) submitting the complaint,
- specify if the complaint is submitted by a representative of the person(s) or community affected by the project, and
- if a representative submits the complaint, include the representative's name, signature, contact details, and written proof of authority.

Presentation/submission of supporting evidence is not necessary but may help review and resolve the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. The GRS will not disclose any personal data that may reveal the identity of complainants without their consent.

### **5.9 Sexual Exploitation, Abuse and Harassment (SEAH), Gender- Based Violence (GBV) and Violence Against Children (VAC) Grievance Management**

The GRM upholds strict protocols for handling Gender-Based Violence (GBV) complaints. When such complaints are received at the first or second tier, receiving officers must immediately implement confidentiality measures while sensitively documenting only essential details: the survivor's exact account, age, and any potential connection between the perpetrator and project activities. This information must be promptly shared with the designated GBV committee for appropriate action that fully respects the survivor's autonomy, preferences, and fundamental rights.

Central to this process is ensuring that survivors receive clear and accessible information regarding the complaint procedure, including expected timelines, potential outcomes, and available support services, all communicated in straightforward and comprehensible language. Survivors retain full control throughout the process, deciding whether to pursue formal grievance procedures and granting explicit consent for any data sharing. The gender-based grievance channel, by adopting best practices, will ensure:

- **Safety and Well-being:** Ensures survivor protection throughout the reporting and investigation processes while mitigating risks for all involved parties. Survivors must feel believed and supported, not investigated.
- **Confidentiality:** Maintains strict privacy protections, sharing information only with informed consent on a need-to-know basis.
- **Survivor-Centered Approach:** Balances due process with survivor autonomy, prioritizing their choices, safety, and dignity at every stage.
- **Accessibility:** Offers multiple entry points and clear reporting information while accepting third-party reports to encourage disclosure and prevent stigma.

A special team known as the **SEAH/GBV Safeguarding Team** (SEAH/GBV ST) will be established from the GRM team to handle GBV/SES/SH complaints. This approach will help minimise the exposure of such cases, including victims and perpetrators, and provide officers with highly specialised skills to address GBV/SEA/SH cases. The procedure for handling GBV/SEA/SH complaints is duly outlined below:

**Registering or Logging a Grievance:** The Project's Grievance Mechanism offers multiple confidential channels for individuals to report concerns related to Sexual Exploitation and Abuse

(SEA) or Sexual Harassment (SH), as presented sections 5.5 and section 5.9 above. Complainants may submit complaints via trusted reporting avenues, including anonymous complaint boxes, grievance forms, dedicated hotlines, service providers, community-based structures, or designated focal points. Although SEA/SH claims can also be lodged through contractor grievance processes, such cases must be promptly referred to the SEA/SH GRM focal person for verification and appropriate action.

Upon receiving a complaint, the assigned representative must complete a complaint intake form, ensuring that the survivor provides written consent before proceeding. If the survivor has not yet been connected to support services, the intake officer must confirm their preferences and facilitate referrals to local medical, psychosocial, or legal assistance, either in person or remotely, as required.

To ensure proper handling of cases at the community level, community-based reporting points must receive training on:

- Active listening techniques to engage survivors with sensitivity,
- Secure referral procedures for SEA/SH incidents, and
- Confidential storage of intake documentation.

Crucially, the survivor's autonomy must be respected at all stages. This approach prioritises the safety, dignity, and access to essential support for survivors while maintaining rigorous accountability measures. Any information collected about a survivor or the alleged perpetrator should be stored separately from other grievance documentation, in a secure, lockable space, with strictly limited access.

**Sort and process:** Upon receiving a sensitive complaint, the GM operator processes it with the complainant's informed consent. The GM focal point first verifies whether support services have been offered, referring the survivor if necessary. The case is then classified as SEA/SH, triggering a notification to the verification coordinator. Within 24 hours, the GM focal point alerts the relevant PIU contact, who subsequently informs the World Bank Task Team Leader. Shared details include the nature of the case, the complainant's age and sex, the project connection, and the services provided, all while strictly protecting the identities of both the survivor and the alleged perpetrator. This ensures a prompt response while maintaining confidentiality.

**Acknowledge receipt:** The GM focal point must provide a formal acknowledgement of the SEA/SH grievance within three days of filing, depending on the initial delivery method. If the complaint was received via a service provider, all communication with the survivor may be managed through the provider.

**Verification process:** The SEAH/GBV Safeguarding Team (constituting personnel trained in survivor-centered approaches, and including the GBV Specialist at the PIU), will act as the verification body for SEAH complaints, examining the facts of each case and its potential project links, whereas the GBV Specialist will act to facilitate the survivor's access to this forum, and make appropriate referrals to GBV service providers, where needed. Within a strict 10-day timeframe, the team assesses incidents to: (1) establish any project linkage and (2) recommend proportionate disciplinary actions to the accused's employer. These recommendations, ranging from formal warnings to termination, consider applicable codes of conduct, the severity of violations, and labor regulations. Crucially, the SEAH/GBV ST's role is investigative rather than adjudicative; it neither determines guilt nor imposes sanctions. Final disciplinary decisions remain

with employers, while legal determinations fall to judicial authorities. This process ensures accountability while respecting institutional boundaries and due process.

**Monitor and evaluate:** Robust monitoring of SEAH complaints is essential to guarantee proper service referrals, respect for informed consent, and efficient case resolution. The project's Grievance Mechanism (GM) operator must execute secure information-sharing procedures with service providers to uphold confidentiality while facilitating necessary case coordination. Information disclosed to the PIU or World Bank will be meticulously restricted to protect privacy, whilst ensuring appropriate case closure. These measures collectively safeguard the secure and confidential management of all complaints.

**Feedback to involved parties:** The survivor must be informed of the verification outcome within 14 days, by the SEAH/GBV ST and be facilitated by the appointed SEAH/GBV GRM focal points in the PIU for safety planning through an established GBV service provider that is accessible to the survivor. The alleged perpetrator may also receive notification. Both parties retain the right to appeal the SEAH/GBV ST's decision through the GM appeals process within 14 days of receiving the verification results. A dedicated appeals committee will be established by the Permanent Secretary, comprising the Project Coordinator and PIU representatives.

#### **5.9.1 Information Gathering, Recording and Documentation on GBV/SEAH**

The following guidelines will be followed in engaging stakeholders and affected parties on SEAH/GBV:

- Information gathering and documentation must be done in a manner that presents the least risk to respondents, is methodologically sound, and builds on current experience and good practice.
- In maintaining records, all details will be kept unidentifiable on individual cases, and the confidentiality and safety of GBV survivors will be protected above all. This means restricting access to case date and incidents' report in the data management system.
- The safety and security of all those involved in information gathering about SRGBV is of paramount concern and should be continuously monitored. The confidentiality of individuals who provide information about SRGBV must be protected at all times.
- Anyone providing information about SRGBV must give informed consent before participating in the data gathering activity.
- All members of the data collection team must be carefully selected and receive relevant and sufficient specialized training and ongoing support.
- Additional safeguards must be put into place for children under 18 years, that are to be the subject of any direct incident information gathering, including mandatory presence of a trained professional adept at communicating with children safely and ethically.

### **6.0 MONITORING AND REPORTING ON SEP**

---

The project adopts a citizen-oriented design across all components. Therefore, the SEP will be periodically reviewed and updated throughout project implementation to maintain accuracy, relevance, and alignment with evolving project phases and contexts.

A dedicated Monitoring and Evaluation (M&E) action plan, to be prepared within 45 days of SEP implementation, will guide all SEP-related M&E efforts, focusing on two primary monitoring approaches:

- field-based review of engagement activities and

- systematic reporting of engagement outcomes.

The Environmental and Social (E&S) team will evaluate engagement effectiveness by soliciting participant feedback and ensure clear communication, including regarding the project GRM.

Post-engagement debriefings with field teams will evaluate whether objectives were met and identify necessary adjustments to enhance future consultations, including the inclusion of missing and/or critical stakeholders. Engagement performance will be assessed after each field session, with interim reviews carried out as required based on stakeholder feedback. The monitoring of project activities related to stakeholder engagement must fit into the overall project M&E framework.

The environmental and social safeguards monitoring will be carried out by the staff of PMU alongside the County/District/Municipal actors and the EPA. The Environmental and Social Monitoring Unit (ESMU) staff verify the application of mitigation measures as contained in the field reports submitted to the Unit. In this case, the ESMU staff will undertake regular visits to project sites to provide technical support and document progress in implementing mitigation measures. Where feasible, County Environmental Officers will support monitoring in line with mandates which is to oversee compliance of development project in the districts with environmental provisions. Reporting on environmental monitoring will be included in the overall project progress reports, which will be shared with the World Bank, EPA and other line stakeholders as necessary.

For this project, environmental monitoring will focus on parameters most likely to be influenced by cable landing and associated activities. Social monitoring will ensure that the project contributes positively to communities and minimizes disruption to livelihoods. This will include

- i) tracking of jobs created, disaggregated by gender, age, and community of origin, for instance monitoring the effectiveness of livelihood restoration efforts for fishers and traders in Big Fanti Town;
- ii) tracking and recording incidents of accidents, exposure to dust or noise, and risks related to traffic and marine operations;
- iii) monitoring participation of women, youth, and marginalized groups in employment, training, and decision-making to ensure social inclusion and equity; and
- iv) assessing the functioning of the Grievance Redress Mechanism (GRM), including number of complaints received, resolved, and pending as a measure of the effectiveness of the grievance redress.

Key performance indicators will measure alignment with SEP objectives, including:

- Formal engagement events (attendance, participation rates, gender-disaggregated, and inclusivity of key groups such as women, youth, and community leaders, fisherfolk).
- Other stakeholder interactions (frequency and methods of contact, e.g., emails, calls, or in-person meetings).
  - o Number of community meetings held to discuss project progress and address stakeholder concerns.
  - o Dissemination of materials, information boards, etc. (type, frequency, and distribution channels) – E.g., Number of information boards displayed in public areas, ensuring project updates and information are accessible to all stakeholders., etc.
- Stakeholder feedback (volume, nature, and sources of comments on project-related issues).
- External input (comments or concerns raised by government authorities and community representatives).

- Number of grievances submitted, addressed, and resolved through the Grievance Mechanism (GM).
- Number of GBV/SEA/SH/Child Labor cases reported and referred to relevant authority (disaggregated by Sex and Age)
- Level of stakeholder satisfaction with the project and the grievance resolution process, measured through follow-up surveys and feedback mechanisms.
- Corrective actions (implementation and impact of changes based on stakeholder input).

This information is provided in more detail in Table 6-1 below:

**Table 6-1: Reporting on Stakeholder Engagement Indicators**

| S. No. | Indicator  | Source of Data   | Frequency of Report                             | Type of Report            | Audience                               |
|--------|--|--|---|---------------------------|--|
| 1      | Formal engagement events   | Emails, calls logs, minutes of events  | Periodic  | Activity report           | All stakeholders                       |
| 2      | Number of community meetings held to discuss project progress and address stakeholder concerns | Meetings reports, attendance sheets  | Quarterly                                       | Consultation report       | Implementing agency and other partners |
| 3      | Number of informative materials disseminated (including on GRM)                                | Copy PDFs of printed material; Reports from GRM focal points; Identifiable pictures of display sites; other meeting reports for where material is provided | Regularly, following project effectiveness date | Progress update           | World Bank; GRM focal points           |
| 4      | Stakeholder feedback and Corrective Action Plans   | Stakeholder meetings and consultation notes; special audits; monitoring visits   | Quarterly                                       | Quarterly progress report | World Bank; Other development partners |

|   |  |          |         |                     |                  |
|---|--|----------|---------|---------------------|------------------|
| 5 | Number of grievances submitted, addressed, and resolved through the Grievance Mechanism (GM); Number of GBV/SEA/SH/Child Labor cases reported and referred to relevant authority (disaggregated by Sex and Age); and Level of stakeholder satisfaction with the project and the grievance resolution process, measured through follow-up surveys and feedback mechanisms | GRM data | Monthly | GRM summary reports | MoPT; World Bank |
|---|--|----------|---------|---------------------|------------------|

The PIU’s Social and Environmental Safeguard Specialists will compile a monthly report on the SEP and Grievance Redress Mechanism (GRM) progress, including the corrective measures taken. These reports will facilitate a timely assessment of complaint resolution efficiency and inform necessary operational adjustments.

**6.1 Reporting Framework**

The project SEP (this document) necessitates ongoing collaboration between stakeholders and the project team. A two-way communication mechanism will be essential to ensure this. Towards this end, the project team will conduct mini evaluations following workshops, conferences, and stakeholder meetings to assess the effectiveness of engagement activities. Feedback from participants will be collected and analysed to refine implementation strategies and enhance future sessions. Findings from these evaluations will be shared internally and disseminated to relevant stakeholders, with key stakeholders receiving updates through formal project reports.

When stakeholder concerns are addressed, the project team will communicate resolutions directly to the parties involved. Reporting and stakeholder communication will adhere to the following principles:

- **Tailored Information Sharing:** The type of information, dissemination medium, and frequency will be determined based on stakeholder needs
- **Transparency in Project Adjustments:** Any modifications to previously agreed-upon commitments or publicized actions will be promptly communicated.
- **Accessibility:** Reports and updates will be provided in the predominant local language, accompanied by visual aids such as photographs and diagrams to improve understanding.

Furthermore, the project team will ensure public accessibility of monitoring results and provide regular updates on stakeholder engagement progress to all parties involved. This approach underscores the project's commitment to accountability, responsiveness, and continuous improvement in stakeholder relations.

#### **6.1.1 Monitoring Reports During Preparation and Construction Stages**

Monitoring during the preparation and construction stages will involve collaborating with stakeholders to ensure that these activities are implemented according to plan. Both formal and informal (structured and unstructured) methods will be employed through a variety of communication channels to solicit comments and ideas as stakeholders are identified for the project. To ensure the successful delivery of the project, the project team will be committed to methodically identifying, documenting, and addressing any stakeholder issues that may arise.

#### **6.1.2 Monitoring Reports During Operation**

The reporting system will employ an inclusive methodology to track all engagement activities and their outcomes. 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, to ensure robust monitoring. The monitoring report during the operational phase will concentrate on the following areas:

- Engagement activities tracking all consultations and outreach efforts.
- Stakeholder feedback analysis categorizing input by type, location and source.
- 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.

### **6.2 Involvement of Stakeholders in Monitoring Activities**

Where the Environmental and Social Safeguard Specialists PIU at the PIU will ensure effective implementation, it will oversee the implementation of activities outlined in the SEP in accordance with the stipulated agreement of the project with support from focal persons at partnering ministries and implementing agencies. Among shared duties will be tracking and recording any agreements and commitments made during stakeholder discussions, including any modifications required by changes to the SEP or the project design.

Data from beneficiaries, businesses, associations, training providers, and other project implementation stakeholders will be gathered to monitor progress. Self-reporting will be carried out according to predetermined schedules using defined data collection instruments (forms, to be developed by PIU) to standardize reporting across the spectrum of stakeholders. Additionally, monitoring visits will be conducted by designated staff from implementing and partner ministries to verify and supplement the collected data.

Regular consultations will be held with women and girls in order to establish and then to help monitor the effectiveness of the GRM procedures, including those specifically designed to address SEAH, GBV, VAC risks, and whether the GRM is in fact accessible, safe, and adequate to address the needs and risks of these stakeholders. These consultations should not seek out or discuss personal experiences of violence or abuse of individual survivors but ask for overall feedback from women and girls.

Beyond internal oversight, independent third-party monitors will periodically be engaged to assess project performance and ensure accountability. Key monitoring indicators will include:

- Stakeholders’ level of understanding of the program,
- Number of grievances received and resolved annually, and
- Degree of participation among affected communities and other stakeholders.

### 6.3 Reporting Back to Stakeholder Groups

The project will utilize established communication channels to share outcomes with stakeholders at both national and sub-national levels. The Project Management Unit, through its Safeguards Specialist or designated personnel, will facilitate community feedback sessions that cover:

- Findings from stakeholder consultations.
- Dissemination of the project implementation progress report.
- Progress report on SEP, GRM and ESMP.

## 7.0 MANAGEMENT OF STAKEHOLDER ENGAGEMENT PLAN

The roles and responsibilities of project stakeholders in implementing the SEP are outlined in Table 7.1 below:

**Table 7-1: Roles and Responsibilities of Stakeholder**

|  |  |
|--|--|
| Project Steering Committee                             | <ul style="list-style-type: none"> <li>● Oversight responsibility for the entire implementation of the WARDIP-SOP2 project:               <ul style="list-style-type: none"> <li>○ convene and support oversight committee meetings;</li> <li>○ prepare consolidated project status, progress, and performance reports for the oversight committee and the World Bank;</li> <li>○ coordinate across implementing and partnering ministries and agencies; and</li> <li>○ undertake due diligence and ensure quality assurance of, and accountability for project implementation, including financial management, procurement, and safeguards. The PIU will be led by the Project Coordinator who will have overall responsibility for implementing the SEP, including leading consultations with key stakeholder groups such as affected communities, private sector actors.</li> </ul> </li> </ul> |
| Project Implementation Unit (PIU), Liberia             | <ul style="list-style-type: none"> <li>● Overall Coordination</li> <li>● Manage and implement the Stakeholder Engagement Plan (SEP)</li> <li>● Dissemination of project information and implementation of effective GRM.</li> </ul>  |
| Environmental Specialist and Social and GBV Specialist | <ul style="list-style-type: none"> <li>● Provide technical support in engaging and addressing environmental concerns of stakeholders.</li> <li>● Coordinate and implement the SEP and GRM (social).</li> <li>● 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).</li> <li>● Dissemination of project and GRM information.</li> <li>● Facilitate and monitor implementation of the SEP.</li> <li>● Incorporate SEP guidelines in contractors’ agreement which includes but not limited to confidentiality, grievance redress mechanism and a defined reporting system.</li> <li>● Organize and conduct national and district level training.</li> </ul>   |

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Develop manuals and modules for capacity building and awareness creation.</li> <li>• Facilitate monitoring and coordinate monitoring activities.</li> <li>• Ensure provisions for gender inclusion and GRM under the SEP are implemented effectively.</li> <li>• Interface with stakeholders and respond to comments or questions about the project or consultation process.</li> <li>• Provide contact information if stakeholders have questions or comments about the project or consultation process.</li> <li>• Document any interactions with external stakeholders.</li> <li>• Maintain database, consultation and feedback records for SEP.</li> <li>• Coordinate public meetings, workshops, focus groups etc.</li> <li>• Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders.</li> <li>• Deliver information to stakeholders on complaint mechanism and procedures of the SEP.</li> </ul> |
| Communication Specialist  | <ul style="list-style-type: none"> <li>• Develop and implement a communication plan.</li> </ul>  |
| Monitoring and Evaluation (M&E) Officer   | <ul style="list-style-type: none"> <li>• Oversight responsibility for monitoring and evaluating the project (SEP, GRM, ESMF, LMP, etc.).</li> </ul>  |
| Contractors and Sub-contractors, Supervisors / Supervising and Resident Engineers | <ul style="list-style-type: none"> <li>• Follow and comply with all, E&amp;S guidelines.</li> <li>• Keep records of all E&amp;S issues on site.</li> </ul>   |
| Third-party monitoring teams  | <ul style="list-style-type: none"> <li>• Compliance check systems.</li> <li>• Audits and surveys.</li> </ul>   |
| Implementing agency (Liberia Ministry of Posts and Telecommunications (MoPT))     | <ul style="list-style-type: none"> <li>• Implementation of project activities that fall under their respective purviews, comprising all elements including financial management, procurement, safeguards, monitoring and evaluation, capacity development and technical assistance, and research and analysis.</li> </ul>  |
| Fonds Africain de Garantie et de Coopération Économique (FAGACE)                  | <ul style="list-style-type: none"> <li>• Establish and maintain an Environmental and Social Management System (ESMS), including policies, procedures, and capacity for screening, assessing, and monitoring the E&amp;S risks of subprojects financed through bond proceeds – communicating the same to Steering Committee via PIU.</li> </ul>   |
| West African Economic and Monetary Union (WAEMU)                                  | <ul style="list-style-type: none"> <li>• Developing and implementing a comprehensive training program open to policy and decision makers in charge of implementing digital transformation programs, and to the staff of WAEMU.</li> </ul>  |

-- END --

## ANNEXURES

### Annex 1: Stakeholder Engaged

The tables below provide information on participants engaged during consultations for the Second Submarine Cable Project in the Buchanan and Big Fanti Town areas, in the months of July to August 2025:

#### **Government and Private Organizations (meetings with male Heads and Directors or Organizations):**

| No. | Institution  | Date            | Engagement Type   |
|-----|--|-----------------|-------------------|
| 1.  | MOPT   | Various         | Technical meeting |
| 2.  | Cable Consortium of Liberia (CCL)                                | 14 July 2025    | Technical meeting |
| 3.  | Liberia Telecommunication Authority (LTA)                        | Various         | Technical meeting |
| 4.  | LTC Mobile   | 06 July 2025    | Technical meeting |
| 5.  | Orange GSM, Liberia  |                 | Technical meeting |
| 6.  | Csqared Liberia  |                 | Technical meeting |
| 7.  | National Port Authority  | 17 July 2025    | Technical meeting |
| 8.  | Ministry of Agriculture (fisheries)                              | 30-31 July 2025 | Technical meeting |
| 9.  | Environmental Protection Agency (EPA)                            |                 | Technical meeting |
| 10. | Liberia Maritime Authority (LMA)                                 |                 | Technical meeting |
| 11. | Powernet   | 18 July 2025    | Technical meeting |
| 12. | Telecel  |                 | Technical meeting |
| 13. | LRREN  |                 | Technical meeting |
| 14. | AC3-Liberia  |                 | Technical meeting |
| 15. | Amilcar Cabral Cable Consortium of Liberia Project (AC3-Liberia) |                 | Technical meeting |
| 16. | Lone Star Cell MTN   |                 | Technical meeting |

|     |                                   |                |   |
|-----|-----------------------------------|----------------|---|
| 17. | Telecel Liberia Inc.              |                | Technical meeting   |
| 18. | NaFAA Headquarters, Monrovia      | 30 July 2025   | Technical meeting   |
| 19. | Buchanan City Corporation         | 04 August 2025 | Technical meeting   |
| 20. | Grand Bassa County Administration | 04 August 2025 | Introductory and coordination meeting with City Manager and Mayor's Office. |

**Community Groups:**

| No. | Group                     | Location:   | Date         | Participants  | No of Participants | Main points of Discussion   | Activity Type   |
|-----|---------------------------|---|--------------|---|--------------------|---|---|
| 1   | Fisherfolk Association    | Big Fanti Town Fisherfolk Association<br>Big Fanti Town, Buchanan | 25 July 2025 | Chairman Community Management Association   | 1 Male             | The project team explained the submarine cable landing process. Fisherfolk raised concerns about temporary fishing disruptions and requested fair compensation.                             | Technical meeting with CMA leadership, joint site assessment            |
| 2   | Women Fishers and Traders | Buchanan Central Market   | 25 July 2025 | Chairlady and a fish seller from Big Fanti Town Fishing Women Association, Buchanan | 2 Females          | Chair highlighted the importance of affordable internet access to support small businesses, trade expansion, and financial inclusion.   | In-person Key Informal Interviews (KIIs)                                |
| 3   | Traditional Leaders       | Grand Bassa Traditional Council                                   | 28 July 2025 | Chairman of Grand Bassa Traditional Council   | 1 Male             | Leader emphasized respect for cultural heritage; requested involvement in land allocation decisions, proper communication channels; land access protocols; community compensation fairness. | Courtesy meetings, protocol signing, traditional authority consultation |

| No. | Group         | Location:                       | Date           | Participants   | No of Participants       | Main points of Discussion  | Activity Type |
|-----|---------------|---------------------------------|----------------|--|--------------------------|--|---------------|
| 4   | Youth group   | Buchanan Youth Center, Buchanan | 28 July 2025   | Chairman Bassa Youth Caucus                            | 9 (males)<br>5 (females) | Chairman requested ICT skills training and employment opportunities linked to the project. | Focus-Group   |
| 5   | Civil Society | LIWEN Office, Buchanan          | 06 August 2025 | Executive Director, Liberian Women Empowerment Network | 1 Female                 | Social safeguards, community rights, environmental monitoring, gender inclusion.           | In-person KII |

**Annex 2: Consultation Questionnaire Template**

*Objective: To gather community, institutional, and stakeholder views regarding potential environmental and social impacts of the submarine cable project, and to integrate their feedback into the ESIA and ESMP.*

**Date of Consultation:** \_\_\_\_\_

**Location:** \_\_\_\_\_

**Facilitator/Consultant:** \_\_\_\_\_

**Respondent Information**

Name (optional): \_\_\_\_\_ Gender:  Male  Female  Prefer not to say

Age: \_\_\_\_\_

Occupation: \_\_\_\_\_

Community/Organization Represented: \_\_\_\_\_

**Section A: Awareness and Knowledge of the Project**

1. Are you aware of the proposed submarine cable landing project in Buchanan, Big Fanti Town?

Yes  No

2. If yes, how did you first hear about it?

Community meeting  Local authority/traditional leader  Radio/TV/Newspaper

Other (please specify): \_\_\_\_\_

3. What is your level of understanding of the project?

Very clear

Somewhat clear  Not clear

**Section B: Perceived Benefits**

4. What benefits do you think the project will bring to your community? (Multiple answers possible)

- Improved internet connectivity     Better business opportunities  Education/learning opportunities
- Employment opportunities  Improved healthcare (telemedicine, online services)
- Other (please specify): \_\_\_\_\_

5. Which groups in the community do you think will benefit the most? \

- Youth     Women     Fisherfolk  Traders     Students     All equally

**Section C: Perceived Risks and Concerns**

6. What concerns do you have about the project? (Check all that apply)

- Loss of fishing areas/livelihood disruption
- Environmental damage (marine/coastal ecosystems)     Noise, dust, pollution from construction
- Land use conflicts or displacement     Waste disposal and sanitation issues  Health and safety concerns
- Social exclusion (certain groups left out)  Other (please specify): \_\_\_\_\_

7. How serious do you think these concerns are for your community?

- Very serious     Moderately serious     Not serious

**Section D: Community Priorities and Recommendations**

8. What should the project developers do to minimize negative impacts?

9. What measures should be taken to ensure the community benefits fairly?

10. How would you like the project to engage with your community going forward?

- Regular town hall meetings  Written updates and notices 📄     Radio announcements
- Through local leaders

Other (please specify): \_\_\_\_\_

### Section E: Grievance Redress

11. If you have a complaint during the project, how would you prefer to raise it?

Through community leaders

Directly to project office/GRM unit

Through local government

Anonymous complaint box

Other (please specify): \_\_\_\_\_

### Closing

12. Do you support the implementation of this project in your community?

Yes, strongly support

Support with conditions

Neutral

Do not support

13. Any additional comments:

**Signature/Thumbprint of Respondent (Optional):** \_\_\_\_\_ **Signature of Interviewer:** \_\_\_\_\_

### Annex 3: Grievance Mechanism Complaint Form (not for SEAH/GBV/VAC cases)<sup>1</sup>

|  |        |   |
|--|--------|---|
| <b>1. Name of Person Raising Grievance:</b> <i>(information is optional and always treated as confidential within records)</i>                               |        |   |
| Name:  |        | Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female |
| <b>Address or contact information for Person Raising Grievance:</b> <i>(information is optional and confidential – NOT APPLICABLE IN SEAH/GBV/VAC cases)</i> |        |   |
| E-mail:  | Phone: | Address:  |

<sup>1</sup> For SEAH/GBV/VAC cases, the Bank ESIRT for SEAH cases would be used for recording and reporting.

|  |  |  |   |  |
|--|--|--|---|--|
| <b>The location where the grievance/problem occurred</b> (write-in)  |  |  |   |  |
| <b>Category of Grievance:</b>  |  |  |   |  |
| <input type="checkbox"/> Environmental safeguards, social issues, including gender, labour, and resettlement   | <input type="checkbox"/> Grievances regarding violations of policies, guidelines, and procedures | Grievances regarding contract violations | <input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency or other financial management concerns | <input type="checkbox"/> Grievances regarding abuse of power/intervention by project or government officials |
| <input type="checkbox"/> Grievances regarding Project Staff Performance  | <input type="checkbox"/> Reports of force majeure  | <input type="checkbox"/> Suggestions     | <input type="checkbox"/> Appreciation   | <input type="checkbox"/> SEAH/ GBV/ VAC (use different form)   |
| <b>Brief Description of Grievance or Inquiry:</b> (provide as much detail and facts as possible)   |  |  |   |  |
| Please include any other information that you consider relevant, other matters or facts, including supporting documents:   |  |  |   |  |
| Do you request that identity be kept confidential? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>                               |  |  |   |  |
| <b>2. Previous Efforts to Resolve the Complaint</b>  |  |  |   |  |
| <b>3. Information on Authorised Representative.</b><br>(If Authorised Representatives are not complainants, their names will be disclosed as needed to ensure transparency). |  |  |   |  |
| Name   | Positions/<br>Organisations  | Addresses                                | Contact numbers   | E-mail addresses   |
|  |  |  |   |  |
|  |  |  |   |  |
| Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female  |  |  |   |  |
| Please provide evidence of the authority to represent the complainant, including the complainant's signature.  |  |  |   |  |

Do you request that identity be kept confidential?

Yes

No



|  |  |  |
|--|--|--|
|  | NAME OF AGGREVIED PARTY (NOT APPLICABLE IN SEAH/GBV/VAC cases)   |  |
|  | GENDER   |  |
|  | LOCATION/ADDRESS   |  |
|  | GRIEVANCE SUMMARY  |  |
|  | WHO WAS INVOLVED?<br>Provide names and titles. Include witnesses.  |  |
|  | WHEN DID IT OCCUR?<br>Date and time  |  |
|  | WHERE DID IT OCCUR?<br>Specific locations  |  |
|  | WHAT HAPPENED?<br>Describe the event in detail. Also, describe any incidents giving rise to the grievance.<br>(NOT APPLICABLE IN SEAH/GBV/VAC cases, where only the SEAH/GBV complaint may be mentioned) |  |
|  | WHY IS THIS A GRIEVANCE?<br>List all policies, procedures, and guidelines violated in the event described.   |  |
|  | POTENTIAL IMPACT ON HUMAN WELL-BEING AND SAFETY  |  |
|  | POTENTIAL IMPACT ON THE PROJECT  |  |
|  | WHAT ADJUSTMENT IS REQUIRED?<br>Describe what must be done to correct the situation/problem.   |  |
|  | ADDITIONAL COMMENTS<br>Attach sheets, if needed.   |  |
|  |  |  |
|  | NAME SCREENING OFFICER   |  |
|  | DATE OF SCREENING  |  |
|  | GRIEVANCE CATEGORY (1,2,3,4)   |  |
|  | RISK RANKING (H, M, L)   |  |
|  | URGENCY RANKING  |  |

**Annex 4: SEP General Evaluation Form**

| EVENT EVALUATION FORM   |                 |                   |               |
|---|-----------------|-------------------|---------------|
| <b>Event Information</b>  |                 |                   |               |
| <b>Event Title</b>  |                 | <b>Date</b>       |               |
| <b>Organiser</b>  |                 | <b>Time</b>       |               |
| <b>Location</b>   |                 | <b>Attendance</b> |               |
| RATING SCALE: 1 = BELOW EXPECTATION   2 = SATISFACTORY   3 = AVERAGE   4 = GOOD   5 = EXCELLENT<br><del>NO</del> UNKNOWN <span style="float: right;"><del>NO</del></span> |                 |                   |               |
| <b>CRITERIA</b>   | <b>COMMENTS</b> |                   | <b>RATING</b> |
| Was the event successful?   |                 |                   |               |
| Rate attendee satisfaction  |                 |                   |               |
| Was the planning process successful?  |                 |                   |               |
| Rate effectiveness of event materials   |                 |                   |               |
| Rate facilities & location  |                 |                   |               |
| Would you recommend holding this event again?<br>Why / why not?   |                 |                   |               |
| What improvements should be made for future events?   |                 |                   |               |
| <b>Additional Comments</b>  |                 |                   |               |
|   |                 |                   |               |

### Annex 5: Training Feedback Form

| TRAINING FEEDBACK FORM                                       |                          |                 |                |              |                       |
|--|--------------------------|-----------------|----------------|--------------|-----------------------|
| TITLE OF TRAINING  | LOCATION                 |                 | TRAINER        |              | DATE                  |
|  |                          |                 |                |              |                       |
| <i>Provide a Rating for each of the statements below.</i>    |                          |                 |                |              |                       |
| <i>By placing an "X" in the corresponding box.</i>           |                          |                 |                |              |                       |
|  | <b>STRONGLY DISAGREE</b> | <b>DISAGREE</b> | <b>NEUTRAL</b> | <b>AGREE</b> | <b>STRONGLY AGREE</b> |
| The objectives of the training were defined well beforehand. |                          |                 |                |              |                       |
| Participation was encouraged throughout the training.        |                          |                 |                |              |                       |
| The topics covered were relevant and informational.          |                          |                 |                |              |                       |
| The materials and content were well-chosen and helpful.      |                          |                 |                |              |                       |
| The training will be helpful to my work.                     |                          |                 |                |              |                       |
| The trainer was knowledgeable about the subject matter.      |                          |                 |                |              |                       |
| The trainer was well-prepared and thorough.                  |                          |                 |                |              |                       |
| The time allotted for the training was sufficient.           |                          |                 |                |              |                       |
| The training location was well chosen.                       |                          |                 |                |              |                       |
| <b>ADDITIONAL COMMENTS</b>                                   |                          |                 |                |              |                       |

The key findings from stakeholder consultations for the WARDIP-SOP2 project in Liberia revealed broad support for enhanced digital connectivity, with stakeholders emphasizing the need for affordable internet, improved digital skills training (especially for youth and women), and reliable infrastructure. Concerns were raised about potential disruptions to fishing and livelihoods during cable installation, the importance of fair compensation for affected landowners, and the need for transparent grievance mechanisms. Stakeholders also

stressed the value of inclusive engagement, requesting targeted outreach to marginalized groups, clear communication strategies, and regular updates to ensure equitable project benefits and effective risk mitigation.