

REPUBLIC OF SIERRA LEONE

**ENHANCING SIERRA LEONE ENERGY ACCESS
PROJECT (P171059)**



**STAKEHOLDER ENGAGEMENT PLAN
FOR
ENHANCING SIERRA LEONE ENERGY ACCESS
PROJECT**

NOVEMBER 2020

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LIST OF ABBREVIATIONS AND ACRONYMS

| | |
|---------|---|
| AF | Additional Financing |
| ARAP | Abbreviated Resettlement Action Plan |
| CLSG | Côte d’Ivoire-Sierra Leone-Sierra Leone-Guinea |
| CSOs | Civil Society Organizations |
| EDSA | Electricity Distribution and Supply Authority |
| EGTC | Electricity Generation and Transmission Company |
| ESHIA | Environmental, Social and Health Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| ESMS | Environmental and Social Management Specialist |
| ESMU | Environmental and Social Management Unit |
| ESURP | Energy Sector Utility Reform Project |
| EWRC | Electricity and Water Regulatory Commission |
| FM | Financial Management |
| FMS | Financial Management Specialist |
| GBV/SEA | Gender-Based Violence / Sexual Exploitation and Abuse |
| GoSL | Government of Sierra Leone |
| GPC | General Project Coordinator |
| GRM | Grievance Redress Mechanism |
| IDA | International Development Association |
| IFC | International Finance Corporation |
| LV | Low Voltage |
| MoE | Ministry of Energy |
| NGOs | Nongovernmental Organizations |
| NPA | National Power Authority |
| O&M | Operation and Maintenance |
| PAP | Project-affected People |
| PIT | Project Implementation Team |
| PIU | Project Implementation Unit |
| PMT | Project Management Team |
| PMU | Project Management Unit |
| PV | Photovoltaic |
| RAP | Resettlement Action Plan |
| RPF | Resettlement Policy Framework |
| WAPP | West African Power Pool |

1.0 INTRODUCTION

1.1 Overview

The Government of Sierra Leone intends to apply for a loan from World Bank (WB) to finance the Enhancing Sierra Leone Energy Access Project (ESLEAP). The proposed electrification project supports the government sector strategy and builds on WB's sustained engagement in the country's energy sector. The main objective of the project is to increase electricity access rates and improve financial performance of the power sector. The proposed activities, when completed, will enhance the capacity of the distribution network to take and distribute additional electricity to be provided by the Cote D'Ivoire, Liberia, Sierra Leone, and Guinea (CLSG) interconnection and other generation capacity and further improve EDSA's technical and commercial performance.

As part of the preparation for the project, GoSL is required to undertake and complete an Environmental and Social Impact Assessment (ESIA) in accordance with the Sierra Leone (EPA-SL) Act 2008 as amended in 2010, the World Bank Environmental and Social Framework (ESF) and the World Bank Group Environmental, Health and Safety Guidelines for Electric Power Transmission and Distribution. Part IV, section 23 subsection 1, of the EPA-SL Act stipulates that projects, as outlined in the First Schedule, require an EIA as a condition of permit commencement of works and operation. The Second Schedule of the Act further highlights the factors determining whether a project requires an EIA. Stakeholder¹ engagement is a requisite part of the ESIA process and is also an important ingredient throughout project conduction to assure successful delivery of the project development objectives.

The World Bank has a long history of multi-stakeholder engagement and strategies to promote effective project preparation, project implementation and project monitoring, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results. The GoSL is committed to partnering the World Bank in mainstreaming stakeholder engagement in operations it supports to improve outcomes.

Stakeholder engagement is about building and maintaining constructive relationships over time. In this context, it is the two-way interaction between stakeholders and the government implementing agencies that gives stakeholders a voice in decision-making with the objective of improving the development outcomes of the intervention. It is an ongoing process that extends

¹ Stakeholders are defined as persons or groups who are directly or indirectly affected by a project, as well as those who may have interest in a project and/or the ability to influence its outcome, either positively or negatively.

throughout the life of the project and encompasses a range of activities and approaches, from information sharing and consultation, to participation, negotiation, and partnerships. The nature and frequency of this engagement would reflect the level of project risks and impacts.

1.2 Purpose, Objective and Rationale of SEP

The purpose of this Stakeholder Engagement Plan is to describe the project's strategy and program for engaging with stakeholders in a culturally appropriate manner: encompassing guiding principles, how stakeholders will be identified and involved throughout the course of the project, provide information on previous engagements undertaken, prescribe processes and procedures to be followed for stakeholder engagement and information disclosure, and outline the responsibilities of the relevant institutions and contractors in the implementation of upcoming engagement activities etc. The goal is to ensure the timely provision of relevant and understandable information. It is also to create a process that provides opportunities for stakeholders to express their views and concerns and allows the project to consider and respond to them.

Key principles that will undergird effective engagement include:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Disseminating information in ways and locations that make it easy for stakeholders to access it;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including women, vulnerable and/or minority groups;
- Processes free of intimidation or coercion;
- Clear mechanisms for responding to people's concerns, suggestions, and grievances; and
- Incorporating feedback into project or program design, and reporting back to stakeholders.

The objectives of the SEP include the following:

- **Ensuring open and transparent understanding between the project and stakeholders:**
A good stakeholder engagement should ensure an open, inclusive and transparent process that is sensitive to cultural and social environments of the stakeholders.

- **Involving stakeholders in implementation:** Local knowledge and information plays an important role in project preparation, implementation and management including scoping, impact assessments, disclosure and validation of all safeguard instruments.
- **Building relationships:** Open, fair and transparent dialogue and engagement will help establish and maintain a productive relationship between the project team and stakeholders.
- **Engaging vulnerable groups:** Often, the concerns of vulnerable people are not adequately addressed but an open and inclusive approach to consultation would increase the opportunity of stakeholders to provide comments on the Project, and to voice their concerns. Some stakeholders, however, need special attention in such a process due to their vulnerability. Special measures will be considered to ensure that the perspectives of vulnerable stakeholders are heard and considered.
- **Managing expectations:** The expectations of stakeholders are usually very high and it is important to ensure that the Project does not unrealistically raise the expectations of stakeholders on proposed project benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, where the latter will be achieved by disseminating accurate information in a timely and accessible way. Information will be made freely, transparently, and objectively by EDSA to all stakeholders.
- **Ensuring compliance:** The stakeholder engagement process will ensure compliance with both local regulatory requirements and international best practice.

An effective stakeholder engagement plan aims to develop a “social license” to operate and will depend on mutual trust, respect and transparent communication between EDSA and its stakeholders. The rationale is to improve decision-making and performance by:

- **Managing risk:** Engagement helps project EDSA and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- **Enhancing reputation:** By committing to environmental protection, EDSA and financial institutions (World Bank) involved in financing the project can boost their credibility and minimize risks;
- **Managing costs:** Effective engagement can help EDSA avoid costs, in terms of money and reputation;
- **Avoiding conflict:** Understanding current and potential issues such as land rights and proposed project activities;
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in EDSA corporate practices and policies;

- **Identifying, monitoring and reporting on impacts:** Understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for EDSA to become aware of and manage stakeholder attitudes and expectations.

1.3 Project Description

The proposed project is aligned with GoSL’s sector development and electrification goals as stipulated in new Medium-Term National Development Plan (2019–2023), entitled ‘Education for Development’. The new MTNDP aims at increasing the country’s electricity access from about 15 percent to 30 percent, including the electrification of all district headquarter towns by 2023. The government has conducted various studies and analysis, supported by donors, to derive a general path to gradually increase electricity access rate.

There are a total of fifteen (15) districts in Sierra Leone, of which the Project will principally be implemented in nine district capital towns and adjoining communities at different scales. See Figure 1 for beneficiary project districts.

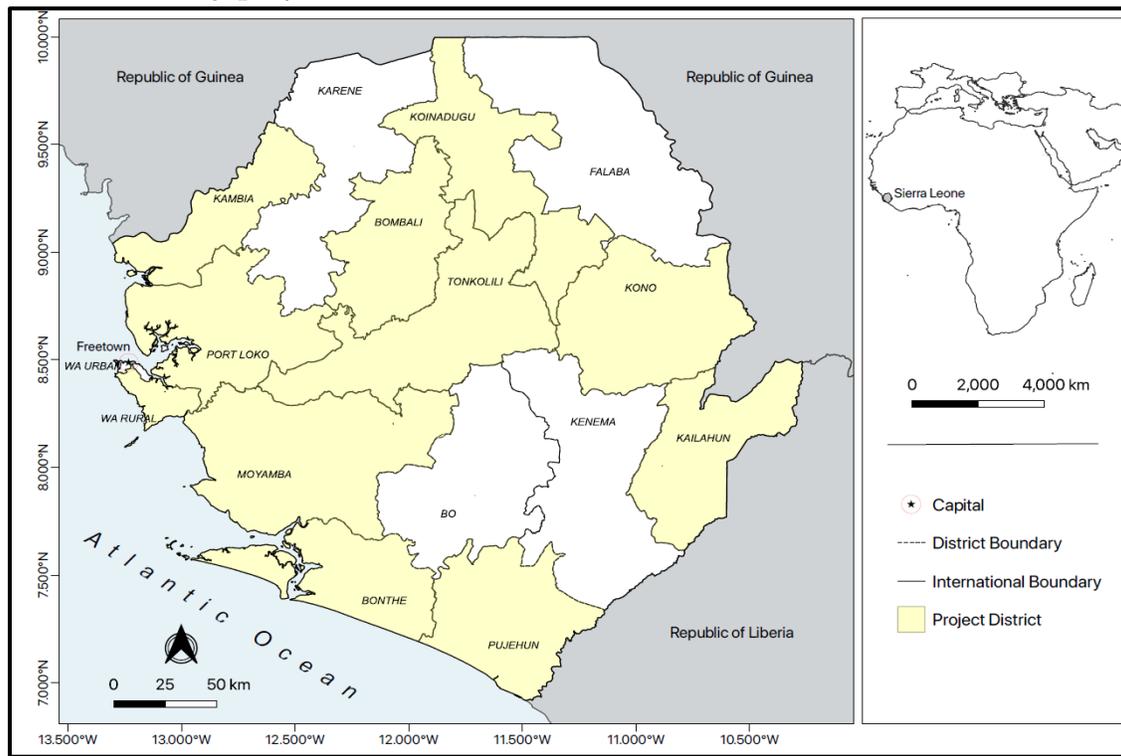


Figure 1: Beneficiary Project Districts

The short-term target is to electrify headquarter towns of all districts where the population,

industrial and commercial activities are concentrated. The total population in these towns (Figure 2) account for about 9.3% of the countries total population (Statistics Sierra Leone, 2018).

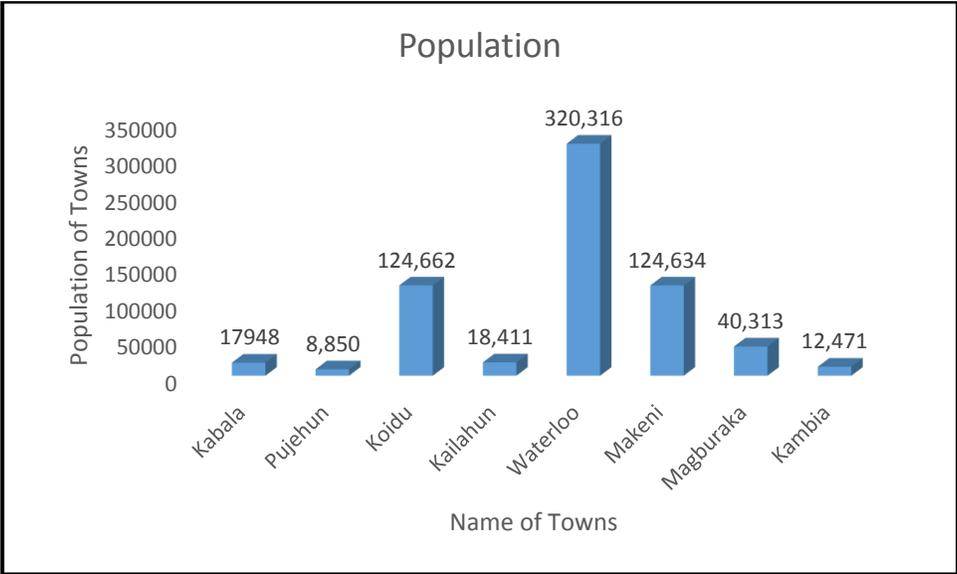


Figure 2: 2015 Population of beneficiary district headquarter towns

Due to the population density, the unit cost of providing electricity service is less than a quarter of that in rural areas. Due to the higher share of industrial and commercial customers, the affordability of consumers as well as the expected economic benefits for electricity service, are much higher. In the meanwhile, the government has supported donors to pilot rural electrification through the development of mini-grids. The government also supports standalone PV systems to be developed by the private sector. The proposed project will increase access to electricity for households, commercial, and industrial users, and public institutions in six of the 15 district headquarters and their surrounding communities, which currently have no access to any form of electricity, through on-grid extension and isolated/mini-grid solutions. The project also support the extension of grid electricity to two district headquarters towns which are currently supplied by high cost and high emission liquid fuel plants. In addition, the project will support financial improvement of the sector through further sector reform, governance and management improvement of EDSA. The project also intends to support private sector participation in grid-connected solar PV development, operation and expansion of isolated/mini-grids, and provision of standalone PV systems to home, public institutions, industrial and commercial entities.

Component 1: Electrification through Grid Extension (US\$41 m)

The component consists of two types of main activities:

(a) Four segments of sub-transmission and distribution lines of 66 kV, 33 kV and shield wire with a total length of about 190 km to connect the distribution networks in four districts headquarter towns to the proposed 225 kV transmission line network in Kambia, Kabala, Kailahun, and Pujehun. If these towns are not connected to the transmission network, they would be served by small liquid fuel generation units, which are costly, polluting and unreliable due to frequent shortage of fuel and spare parts); and

(b) The rehabilitation and expansion of the distribution networks in Waterloo, Makeni, Magbraka, Koidu, and Port Loko, including several adjacent communities to provide electricity to new customers.

Table 1 depicts the number of new customers to be added to the Grid.

Table 1: Number of Customers to be Added or Connected to the Grid

| Towns | Total Population | No of Household (HH) | No of HH connected to the grid | No of HH to be connected under the Project* |
|------------------|-------------------------|-----------------------------|---------------------------------------|--|
| <i>Kabala</i> | 17,948 | 2,991 | 0 | 1,455 |
| <i>Pujehun</i> | 8,850 | 1,475 | 0 | 738 |
| <i>Kambia</i> | 12,471 | 2,078 | 0 | 1,040 |
| <i>Kailahun</i> | 18,411 | 5,068 | 0 | 2,534 |
| <i>Waterloo</i> | 320,316 | 53,386 | EDSA | 30,000 |
| <i>Makeni</i> | 124,634 | 20,772 | 12,344 | 2,850 |
| <i>Magburaka</i> | 40,313 | 6,720 | 1,050 | 2,300 |
| <i>Koidu</i> | 124,662 | 20,777 | 2,904 | 3,150 |
| <i>Port Loko</i> | 33,541 | 5,590 | 714 | 2,650 |

Component 2: Electrification through mini-grid and standalone solar systems (US\$15.7 m)

Due to the very low access rate in the country, the Government will focus on electrification of major towns and communities close to the transmission lines in the short to medium term through grid extension. The component will address the challenges to opening-up and scaling up the market in the productive sector by the private sector help and directly support the the provision of solar electricity for health facilities and schools as electricity provision for these public institutions would need to be done through public funding. The component includes five subcomponents:

1. *Subcomponent 2(a). Installation of a mini-grid (US\$5.0 m IDA).*
2. *Subcomponent 2 (b). Off-grid market development fund (US\$4.0 m IDA).*

3. *Subcomponent 2 (c). Installation of solar PV systems for health facilities (US\$1.7 m IDA, US\$1.3 m PHGR) .*
4. *Subcomponent 2 (d). Provision of solar PV systems and solar lanterns for schools (US\$1.3 m IDA, US\$1.4 m PHGD grant).*

Component 3: Human capital development and project implementation support (US\$6 million)

Sub-component 3(a). This subcomponent will support MoE in: (i) the procurement of a private firm for the operation, maintenance and future expansion of the mini-grid under component 2; (ii) the development and operationalizing of the off-grid market development fund; (iii) preparation of a clean cooking investment project; (iv) the strengthening of the institutional capacity of the key stakeholders in promoting and managing the development of renewable energy and in implementing national electrification strategy; (v) strengthening of policy and institutional capacity to reduce gender disparity in energy sector employment and in energy access; and (vi) operational expenditures.

Sub-component 3(b). This sub-component will support EDSA building on the progress made in improving EDSA’s management and staff capacity, further strengthening the governance and management of EDSA to achieve full corporatization and commercialization so that EDSA management has the autonomy and incentives to manage and is fully accountable for the results, while the Government agencies play their respective roles as policy maker and regulator and keep at arm length from EDSA’s daily operations.

Table 2 shows the project components, implementing agencies and the indicative budget.

Table 2:Project Components, Implementing Agencies and Indicative Budget

| Components | Implementing Agency | Amount (US\$, millions) |
|---|----------------------------|--------------------------------|
| Component 1: Electrification by grid extension | EDSA | 41 |
| • Distribution network expansion and customer connection | | 22.5 |
| • 66 kV sub-transmission line | | 10.5 |
| • 33 kV distribution lines to link with transmission network | | 4.0 |
| • Meters | | 3.0 |
| • Construction supervision engineering consultant | | 1.0 |
| Component 2: Off-grid market development | MoE | 15.7 |
| Subcomponent 2.1: Solar generation and battery storage in Moyamba | | 5.0 |
| Subcomponent 2.2 Funds for Solar PV systems for productive businesses | | 4.0 |
| Subcomponent 2.3: Solar PV systems for health facilities | | 3.0 |
| Subcomponent 2.4 Solar PV systems and lanterns for schools | | 2.7 |

| | | |
|--|------|---------------|
| Subcomponent 2.5: Results monitoring and evaluation | | 1.0 |
| Component 3: Human Capital Development and Implementation Support | | 6.0 |
| • Implementation support to MoE | MoE | 2.5 |
| • Studies and training | MoE | 1.5 |
| • Technical advisers, consulting services and Training | EDSA | 2.0 |
| TOTAL | | \$62.7 |

1.4 Potential Social and Environmental Risks and Impacts

The ESLEAP is anticipated to bring significant positive changes to the populations in the project districts. However, the project would also have adverse environmental and social impacts which need to be assessed and appropriate mitigation incorporated to enhance project outcomes.

1.4.1 Positive impacts of the ESLEAP

I. Employment Generation

II. Improvements in standards of living

1.4.2 Negative environmental and social impacts

There is a wide range of potential environmental and social problems to be caused by the ESLEAP. Such impacts may arise during the development stage (e.g., construction of transmission lines) or may endure throughout the life of the project, over several decades. The impacts can be permanent, even if there is closure and decommissioning, unless carefully planned rehabilitation is undertaken.

Project impact assessment is based on the social, ecological and physical information gathered during the study, and knowledge of biophysical and social interactions in the project locations. Using these pieces of information, impacts have been characterized into those that affect the biophysical and the socio-economic environments. For each impact, a brief description is provided.

I. Pre-construction Phase

- A. Noise and emissions, accidents and potential damage to road and infrastructure
- B. Safety of Residents

II. Construction and Implementation Phase

As with most projects of this nature, construction and/or rehabilitation phase impacts are transient and will be felt during the actual period of implementation.

A. Impacts arising from transportation and storage of materials

The issues involved in the rehabilitation and or construction of the networks include:

- Transportation of equipment and materials to the site, involving medium to heavy-duty trucks carrying loads to the various construction sites along the line route and substation sites; and
- Storage of the materials, with long travel distances to the provincial headquarter towns. The road network to most of the towns is quite adequate although access to the sites within hilly areas could be difficult.

The impacts associated with transportation would include:

- Noise from truck movements;
- Emissions from vehicle exhausts;
- Dust emission from haulage of sand;
- Damage to road surfaces and dust generation where roads are not paved; and
- Potential road accidents including falling objects from trucks.

These impacts would affect soil, air, ambient noise, land use, and occupational/public health and safety.

B. Impacts arising from digging trenches for underground works

The impacts arising from this activity include:

- Exposure of soils to erosion and degradation from runoff;
- Noise from grading machinery;
- Sediments and runoff from exposed soil surfaces polluting receiving water bodies; and
- Loss of use of land and structures in RoW by existing users who are within the vertical clearance limit.

C. Other impacts arising from installation and construction works

Other adverse impacts associated with construction include:

- Waste generation;
- Chance archaeological finds during excavations; and
- Safety of workers assembling tower members.
- Resettlement impacts

D. Loss of Vegetation

E. Soil Erosion Concerns

F. Loss of Habitats

G. Fire hazards

H. Concerns regarding Creosote Chemicals on Wooden Distribution Poles

- I. Occupational Health and Safety for the Workers and the Public
- J. Potential Disruption of Supply of Electricity to Business and Other Existing Customers
- K. Loss of land, assets, and livelihood
- L. Noise from Construction Crew and Traffic
- M. Concerns related to the influx of population
 - a) HIV/ AIDS Concerns
 - b) Gender-Based Violence (GBV), Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA)
 - c) Insecurity and theft

III. Concerns related to Operation and Utilization of Electricity

- a) Community health and safety
- b) Increased Hazardous Wastes
- c) Vandalism of Infrastructure
- d) Concerns over Transformer Oil Spillages

2.0 APPLICABLE REGULATIONS AND REQUIREMENTS

This SEP considers the existing national institutional and regulatory requirements pertaining to stakeholder participation in development initiatives and the WB's Environmental and Social Framework (ESF) and the 10 associated Environmental and Social Standards (ESSs). The SEP will comply with stakeholder consultation and information disclosure requirements as stipulated in national legal instruments and international best practice.

2.1 World Bank Requirements

WB has outline ten (10) comprehensive set of specific Environmental and Social Standards (ESS) that projects are expected to meet. Stakeholder engagement in line with the World Bank requirements is associated with ESS 10. The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

ESS 10 require that a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower must disclose the updated SEP. According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

Identification of stakeholders will ensure wide participation in project acceptability and the project design. To ensure that there is citizen participation in the project life span, this SEP has been prepared clearly stipulating the process of consultation and disclosure of key project information to the public and relevant stakeholders during the preparation and implementation of the project.

3.0 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During the project identification and preparation stage, several consultations took place at the national level involving the MoE, EDSA and other interested parties and at the respective local levels involving other agencies and key stakeholders. The meetings were to discuss the project locations, areas of influence, concept, design, institutional arrangement, potential impacts, mitigation measures, stakeholder engagement plan, environmental and social commitment plan and MoE/EDSA commitments. Table 3 presents a summary of the key issues discussed and the conclusions and recommendations ensuing from these stakeholder engagement sessions. Detailed minutes of these consultations is included in Annex 1.

Table 3: Summary of previous stakeholder engagement and communication activities

| Institution | Names | Position | Key issues discussed | Conclusions/recommendations and next steps |
|--|---------------------|---|--|---|
| Ministry of Energy | Dr. Edmund Wuseni | General Project Coordinator/ Head of Planning Unit | <ul style="list-style-type: none"> Project design; goals and target Project potential impact Key stakeholders to be involved and engaged Experience sharing of previous projects like EAP and ESURP and mode of consultations | <ul style="list-style-type: none"> Ensure and support adequate consultations A lot of positive impacts and wants to be involved in the monitoring Support inclusions of all stakeholders Work closely with EDSA and Contractors |
| | Albert Patewa | Financial Management Specialist | | |
| | Cyril Grant | Project Manager | | |
| Energy Distribution and Supply Authority | Ing. Francis Nyama | Deputy Director General | <ul style="list-style-type: none"> Consulted on project design Support to SEP role out during project implementation Project potential impact Existing structures at EDSA for stakeholder engagement What has worked for EAP and ESURP and what has not worked? | <ul style="list-style-type: none"> Committed to supporting and facilitating SEP Support GRM and draw from previous EAP and EURP projects Might consider the recruitment of specialized staff for the project There is need for community engagement including local Chiefs Involvement of local councils Training for project staff especially on environmental and social safeguards including GBV and disability issues |
| | Aleksandar Nikolic | Adviser to Distribution Technical Services Director | | |
| | Edward Parkinson | Planning Manager | | |
| | Mallay Bangura | Project Manager | | |
| Project Implementation Team | Peter Chamfya | Project Coordinator | <ul style="list-style-type: none"> What has worked for EAP and ESURP and what has not worked? | <ul style="list-style-type: none"> Involvement of local councils Training for project staff especially on environmental and social safeguards including GBV and disability issues |
| | Kombo Koroma | Financial Management Specialist | | |
| | Richard A.S.L. Goba | Procurement Officer | | |

| | | | | |
|--|--------------------|---|---|---|
| | Babajide Taylor | Project Engineer | | |
| Port Loko District Council | Alhaji Bangura | Chief Administrator | <ul style="list-style-type: none"> • Key stakeholders and to be involved at multiple levels • Project description and instruments • Project potential impacts • Structures within the district council to enhance SEP • Land tenure • Mode of communication and continuous engagement | <ul style="list-style-type: none"> • Urged the inclusions of the Chiefdom authorities as they will be critical in provision of land and in any GRM and compensation • A lot of positive impacts and wants to be involved in the monitoring • Important to consult and engage land owners • Radios and CSOs trusted and would be important in SEP |
| | Cecilia F Sesay | Environmental and Social Officer (ESO) | | |
| | Aisha Mariam Kabba | Gender Officer | | |
| Regional Women's Coordinator Port Loko | Mariatu Songo-Kanu | Regional Women's Coordinator | <ul style="list-style-type: none"> • Project concept and description • Women participation • Cost of electricity and other challenges for women | <ul style="list-style-type: none"> • Welcomed project and acknowledged the its importance for women • A lot of positive impacts and wants to be involved in the monitoring • Recommended training for women and their involvement • Making electricity affordable for women and small businesses • Continues engagement and involvement of women |
| Port Loko | Mohamed Kamara | Campaign for Good Governance (Chairman CSO's) | <ul style="list-style-type: none"> • Project concept and description • Women participation • Mode of communication and continuous engagement | |
| Kambia Initial Stakeholders Meeting | | | | |
| Kambia District Council | Mohamed M Sumah | Deputy Chairman | <ul style="list-style-type: none"> • Key stakeholders and to be involved at multiple levels • Project description and instruments • Structures within the district council to enhance SEP • Land tenure | <ul style="list-style-type: none"> • Request the involvement of the council in the monitoring and using their existing structures • Want the involvement of the gender officer/disability desk. • Encouraged the involvement of local Chiefdom and District authorities who would be |
| | Mannie Pessima | Valuation Officer | | |
| | Harry Williams | Gender Officer/Disability desk | | |

| | | | | |
|---|-------|------------------------------|--|---|
| | | | <ul style="list-style-type: none"> • Mode of communication and engagement | helpful in providing access to land and assist in the implementation of GRM |
| Women's Forum Representative Kambia | Adama | Women's Forum Representative | <ul style="list-style-type: none"> • Project design • Gender issues • Project safeguards instrument • Mode of communication and engagement | |
| Pujehun Initial Stakeholders Meeting | | | | |

| | | | | |
|--------------------------------|--------------------------|--|--|--|
| Pujehun District Council | Sallieu Konneh | Council Engineer | Key stakeholders and to be involved at multiple levels | The Chief Administrator called for equitable distribution, oversight of projects including SLEP, sustainability through involvement and ownership of the community/stakeholders, sensitization for all especially because of problems with theft of properties (he lamented the damage to the solar street lights because most of the batteries have been stolen), and training. The Gender, Environmental and Social Officer and others all urged the involvement of women training and sensitization but welcomed the project for its enormous potential to improve the lives of the people through improve education, healthcare etc. |
| | Ibrahim Kabim Sesay | Gender Officer | Project description and safeguards instruments | |
| | MORie Bayoh Kabba | WASH Engineer | Project potential impacts and mitigation measures | |
| | Timothy A Kamara | Environmental and Social Officer | Structures within the district council to enhance SEP | |
| | Sahr E Yambasu | Chief Administrator | Land tenure Mode of communication | |
| Ministry of Youth | Abdull Gassim Daramy | District Youth Officer | | Youth employment and training for youth and women were strongly emphasized in Pujehun by the District Youth officer |
| Chiefdom and Local Authorities | Chief Sylvester M Kamara | Chiefdom Speaker | Discussed the project, scope, potential impacts, potential land acquisition issues, compensation | The Chiefdom Speaker, Town Chief, and the Chairman of the Pujehun Districts Descendants Association were also very delighted and expressed their commitment to support the project and would be happy to help resolve land access and ownership issues |
| | Chief Mustapha B Koroma | Town Chief, Pujehun | | |
| | Patrick Ansu Kaikai | Chairman, Pujehun District Development Association | | |
| CSO | Ibrahim B Swaray | Chairman, Civil Society Organizations | Discussed broadly the project and the potential CSO stakeholders and roles | Welcomed project and look forward to working with all stakeholders and coordinate other CSOs. Urged a free, fair and transparent process |
| Medical Officer | Dr Samba Jalloh | Medical Officer | Discussed the project scope, stakeholder's engagement, potential impacts and mitigation | The District Medical Officer looked forward to the project and mentioned to us that the hospital especially the Covid-19 Isolation Unit had a generator running all the time to help patients and also have a dedicated generator for the other Wards and another one is always on for surgeries. Although he was pleased to have the current |

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| | | | | arrangement, but he did say a more sustainable supply would be welcomed |
| | Alhussein B Jalloh | National Civil Registration Authority (NCRA) | Discussed the project scope, stakeholder’s engagement, potential impacts and mitigation | He welcomed the project and looked forward to the project |

4.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The WB ESS 10 recognizes three broad categories of stakeholders, namely i) Project Affected Parties; ii) Other Interested parties; and iii) Disadvantaged / vulnerable individuals or groups.

Project-affected parties includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project.

The term “Other interested parties” (OIPs) refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project.

4.1 Stakeholder Identification

The first step in the process of stakeholder engagement is to identify and understand who the stakeholders are and understand their needs and expectations for engagement and their priorities and objectives in relation to the Project. This information shall be used to tailor engagement to each type of stakeholder. As part of this process, it will be particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalised or vulnerable status.

With respect to the ESLEAP, different categories of stakeholders will be involved, these are:

1. **Central government:** Include ministries, departments and agencies of the Government of Sierra Leone that will either be impacted by the project or have influence over its outcome.
2. **Municipalities:** Includes Government of Sierra Leone’s institutions, agencies and elected officials within the beneficiary municipalities that will either be impacted by the project or have influence over its outcome;
3. **Non-governmental/Donor:** Donors and non-governmental agencies and sector coordination entities that will either be impacted by the project or have influence over its outcome;
4. **Civil Society:** Representatives from organizations that represent the interests and the opinions of the public;
5. **Public:** Public representatives, both individuals and groups, at District/Ward level who will either be impacted by the project or have influence over its outcome; and
6. **Private Sector:** Private businesses/firms that may be positively or negatively affected.

Table 4 presents a preliminary list of all potential stakeholders who have a role and responsibility for the implementation of the Project at all levels, as well as relevant stakeholders that could be involved in any way with the implementation of the ESLEAP activities or affected by its activities. The project will continue to identify and engage additional stakeholders throughout the project implementation. The scale and extent of the engagement will be dependent on the nature of the impacts on the different stakeholder groups and the extent of the influence of the group on the project.

Table 4: List of Stakeholders identified for ESLEAP

| Affected Parties | Vulnerable groups | Other Interested Parties |
|--|--|--|
| <ul style="list-style-type: none"> • Project affected individuals and communities • Ministry of Energy • Ministry of Finance • Electricity users • EDSA, EGTC and EWRC workers • Small business that require electricity • Community leaders, religious leaders • Workers at construction sites • Ministry of Lands Housing and Country Planning • Ministry of Information and communication | <ul style="list-style-type: none"> • Elderly people • Women • Children • Persons with disabilities • Commercial sex workers • Illiterate people • Blind persons • The homeless | <ul style="list-style-type: none"> • Local communities • Chiefs • NGOs • CSOs • Ministry of Health and Sanitation • Ministry of Health and Sanitation • Ministry of Water Resources • National Protected Areas Authority • Ministry of Basic and Senior Secondary Schools |

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| <ul style="list-style-type: none"> • Ministry of Local Government and Rural Development • Ministry of Labour and Social Security • Ministry of Social Welfare and Gender • Ministry of Environment • Environment Protection Agency • District and Local Councils • Sierra Leone Roads Authority • Operations and maintenance team of substations, and transmission lines | | <ul style="list-style-type: none"> • Ministry of Technical and Higher Education • Community Organizations • The public • Other national and international Independent Power Producers (IPPs) • The police and military (security forces) • Market associations • Youth groups • Residents of the beneficiary towns • Businesses locally and with international links • Media (local and national) |
|--|--|---|

Cooperation and negotiation with stakeholders will require the identification of persons within groups who act as legitimate representatives or advocates of their groups’ interests in the engagement process. Community representatives, for instance, will be very important links for information dissemination to their people and to project staff.

4.2 Stakeholder analysis

The opinion of affected persons and other stakeholders shall be sought through regular public consultations and the engagement will be directly proportional to the impact on the particular group or individual and their level of influence on the project. The interests of the different stakeholder groups and individuals, how they will be affected by the project and to what degree, and what influence they could have on the project will form the basis from which to build the project stakeholder engagement strategy. Again, cognizance should be taken of the fact that not all stakeholders in a particular group or sub-group will necessarily share the same concerns or have unified opinions or priorities. Also, the means of engagement will be informed by what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

Table 5 presents an analysis of roles, interest and influence of key stakeholder groups on the ESLEAP.

Table 5: Stakeholder Groups and their Interest and Influence on the Project

| Stakeholder Groups | Role/involvement in project | Interest | Influence |
|--|--|-----------------|------------------|
| <ul style="list-style-type: none"> Ministry of Energy | Responsible for oversight and overall coordination of the project. Responsible for policy formulation. Regulate generation, distribution and transmission. Will lead the implementation of two components. The Ministry and EDSA will also assume the responsibility for environmental and social risk management | High | High |
| <ul style="list-style-type: none"> Ministry of Finance | Provide oversight and control of disbursement of project funds to implementing agencies. Reporting and monitoring of compliance | High | High |
| <ul style="list-style-type: none"> Ministry of Lands Housing and Country Planning | In concert with MoE and EDSA, deal with land issues and grievances that may arise between parties. Facilitate the preparation and signing of survey plans for EDSA, provision of land and alternative lands for PAPs. | Moderate | High |
| <ul style="list-style-type: none"> Ministry of Information and communication | Dissemination of information and is the mouthpiece of Government. Helps in information disclosure of the project | High | Moderate |
| <ul style="list-style-type: none"> Ministry of Local Government and Rural Development | Local monitoring of project and through their District Council can help in monitoring, providing land and enhancing compensation and livelihood issues for PAPS. They are directly responsible for working with the District and Local councils who have important structures to help in site monitoring of the project. They are expected to play a key role in lands, resettlement, compensation and environmental impacts monitoring. | High | High |
| <ul style="list-style-type: none"> Ministry of Health and Sanitation | In charge of all public health, clinics and hospitals in the Districts where the electricity is improved and will enhance healthcare for all. They can be important stakeholders. | High | Moderate |
| <ul style="list-style-type: none"> Ministry of Labour and Social Security | Oversight over labour and social issues. They are important for oversight of contractors to make sure that workers are treated fairly and work with the laws of Sierra Leone | Moderate | Moderate |
| <ul style="list-style-type: none"> Ministry of Social Welfare and Gender | Oversight on Gender and Social Issues. Works closely with the Police and advocacy groups on gender-based violence issues. This Ministry will be critical in monitoring and resolving GBV and other gender-related issues | High | High |
| <ul style="list-style-type: none"> Ministry of Environment | Provide oversight on compliance on environmental and social safeguards and on EPA. Review and issue licenses for ESHIA. They are the main stakeholders | High | High |

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| | in terms of environmental and social safeguards monitoring and compliance | | |
| • Ministry of Water Resources | In charge of all water bodies and catchment areas in the country and would play important role in the event any of the towers/poles go through water bodies. They also help in the provision of water services to substations and project site. | Low | Low |
| • Energy Distribution and Supply Authority | Main implementing agency Responsible for the overall implementation of the project and sub-projects and works directly and in close collaboration with MoE and has oversight over the PIT. Responsible for the implementation of Environmental and Social safeguards instruments of projects and stakeholder management. All projects have a GRM within the ESMU of EDSA. Coordinate and organize disclosure, work with District and Local Councils. EDSA is responsible for the distribution network, connection and for electricity sales to customers | High | High |
| • Energy Generation and Transmission Company | Responsible for power generation and transmission at high voltage levels | High | High |
| • Energy and Water Regulatory Commission | Regulate the generation, transmission and sale of electricity and issue permit for operation of EDSA. They will probably be involved in tariff setting and regulation issues for the new ESLEAP especially because some of the towns are going to be having new connections. | High | High |
| • Environment Protection Agency | The lead environmental regulator and is the agency in the Ministry of Environment that is directly responsible for oversight, compliance with and licenses for ESHIA, facilitate public disclosure of EIS. They require stakeholder engagement, consultations and public disclosure of all safeguard instruments. | High | High |
| • National Protected Areas Authority | In charge of all protected Areas and would ensure projects are not impacting Pas. They will constitute the stakeholders and would be important should any of the project activities go through any Protected Areas which is under their jurisdiction. | Moderate | Moderate |
| • Ministry of Basic and Senior Secondary School | Responsible for education in school and the schools would be connected to the grid for the enhancement of the Government's flagship program "free and quality education" | Moderate | Moderate |
| • Ministry of Technical and Higher Education | Responsible for University and higher institutions in the Districts and would benefit from sustainable and regular electricity which will enhance education in the country | Moderate | Moderate |

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| • Office Attorney General and Minister of Justice | Draft compensation agreements, provide guidance on GRM and participate in compensation and sign-off meetings | Moderate | Moderate |
| • Ministry of Agriculture | Provide valuation of crops and trees for compensation and support linkages to livelihood promotion initiative | Moderate | Moderate |
| • Sierra Leone Roads Authority | Responsible for ROW, support compensation and demolition | Moderate | Moderate |
| • District and Local Councils | Assist in project implementation including land acquisition, employment, asset valuation and other issues to do with the livelihood of the people in the project areas of influence. Verify asset valuations, support in providing land and manage the councilors | High | High |
| • Parliament/Energy Committee | Provides oversight on energy projects and EDSA including ESLEAP | Moderate | High |
| • NGOS/CSOs in the project area of influence | Advocates the interests of communities on land-related issues including compensation. Involved in consultations and monitoring of corporate social responsibilities, make contributions to ESHIAs and other reports | Moderate | High |
| • Media electronic, print and social media | Help raise awareness on the project, public disclosure of ESIA, RAP, ESMF, RF, SEP, ESCP | Moderate | High |
| • Sierra Leone Police | Provide security and protection services for all and during construction, demolition and traffic management. Project can bring crime, violence and other offences Used to report Gender Based Violence through their Family Support Unit | Moderate | Moderate |
| • PAPS potentially losing land and other assets for the construction of substations and power lines | Lose lands or right to their lands or livelihoods and would therefore be important in the consultation and engagement process | High | Low |
| Vulnerable/Disadvantaged groups are likely to be part of the PAPs and may have difficulty in fully engaging | | | |
| • Elderly people | Receive information on the SL Energy project | Low | Low |
| • Women | Receive information and would benefit from sustainable electricity generation especially for small businesses | Low | Low |
| • Children | Receive information, they are mainly school going, exposed to potential abuse | Low | Low |
| • Persons with disabilities | Receive information on the SL Energy Project | Low | Low |

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| • Commercial workers | sex | Receive information and protection from electricity generation and availability | Low | Low |
|----------------------|-----|---|-----|-----|

5.0 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an important inclusive process conducted throughout the project cycle and is critical to the successful implementation of projects. The engagement will be free of manipulation, interference, coercion, and intimidation; and conducted based on timely, relevant, understandable and accessible information, in a culturally sensitive format.

In this section the program elaborated for facilitate effective stakeholder engagement throughout project implementation and operation is outlined. It addresses key factors considered in elaborating the program, the specific communication tools to be adopted for different stakeholder groups, the specific stakeholder engagement activities and the resource requirements and responsibilities for implementation.

5.1 Stakeholder Engagement Considerations

The following factors were considered in the planning of the stakeholder engagement program presented in this document:

i) Time and resources

Trust of the stakeholders is important and takes time to develop and build relationships with stakeholders. From the outset of the project, relationships with stakeholders will be developed, nurtured and allowed to grow. Time and resources are always critical components of the stakeholder engagement process that require different levels of engagement (consultation, involvement, collaboration and yet some others multiple levels). The various dimensions of the process, including education on the concepts of engagement, capacity to implement a broad engagement strategy and the complex issues that requires technical and specialized knowledge will be allocated adequate resources to meet international best practice.

ii) Managing expectations

The key to securing stakeholder engagement revolves around managing their expectations and satisfying their requirements. Stakeholders usually have high and unrealistic expectations of benefits that may accrue to them from a project. Therefore, EDSA from the outset shall be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities. The engagement processes shall provide EDSA with an opportunity to develop relationships with stakeholders and potential project partners who can assist with implementing corporate social responsibility projects. The consultation process is an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions, which are feedback to the client and other project specialists.

iii) Securing stakeholder participation

EDSA will respect cultural norms and values and show respect and understanding that disregard for these can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging to identify stakeholders who are representative of common interests. This shall be avoided by employing local consultants who are sensitive to local power dynamics, which will require project proponents to develop an awareness of the local context and implementing structures to support and foster effective stakeholder engagement.

iv) Consultation fatigue

Engagement fatigue can hinder projects, particularly those where individuals are not actively involved in decision-making but are brought in for consultation or opinions. Evidence suggest that stakeholders can easily tire of consultation processes, especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives are not improving because of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This shall be avoided by coordinating stakeholder engagement activities throughout project implementation and to avoid making promises to stakeholders.

v) COVID-19 restrictions

In general, a precautionary approach will be taken to the consultation process to prevent contagion, given the highly infectious nature of COVID-19. The following will be considered while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;

- Assess and deploy alternative tools to engage stakeholders such as the use of community radio, use of key community influencers and peer groups, visual aids, and social media;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

5.2 Specific Communication Requirements

A variety of communication methods will be used as appropriate for each set of stakeholders and stage of project implementation. In general, these include: a) public and individual meetings, b) announcements in media and portals, c) provision of general information on notice-boards at public locations, and d) regular mail and email correspondence and publication of relevant project information on the website of the EDSA, MoE and other relevant institutions (including the World Bank).

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders. When selecting a particular consultation technique, appropriate consultation methods, and the purpose for engaging with a stakeholder group shall be considered. The general framework of techniques to be adopted under the project for the different stakeholder groups are presented in Table 6 below.

Table 6: Stakeholder Engagement Techniques

| Stakeholder group | Engagement Technique | Phase of the projects |
|--|--|--|
| Projected affected people/land owners/adjacent communities | <ul style="list-style-type: none"> Public consultation meeting, group meetings and individual meetings as necessary | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works - throughout project implementation |
| | <ul style="list-style-type: none"> Public consultation meeting, and individual meetings as necessary | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works |
| | <ul style="list-style-type: none"> Informing through the media - radio/TV/social media (announcements), | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works |

| Stakeholder group | Engagement Technique | Phase of the projects |
|---|---|---|
| | <ul style="list-style-type: none"> ▪ Direct information through the local authorities ▪ Communication through bulletin boards (placed in appropriate places) and posting project information/notices there | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works -During the operational phase of the distribution centres |
| Community/Local and regional authorities | <ul style="list-style-type: none"> ▪ Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the branch offices of the Municipalities at least two weeks prior to the start of any construction works, | Before starting with implementation of the project activities |
| | <ul style="list-style-type: none"> ▪ Public consultation meeting, and individual meetings as necessary | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works |
| | <ul style="list-style-type: none"> ▪ Informing through the media - radio/TV/social media (announcements), | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works |
| | <ul style="list-style-type: none"> ▪ Direct information through the local authorities ▪ Communication through bulletin boards (placed in appropriate places) and posting project information/notices there | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works -During the operational phase of the distribution centres |
| | <ul style="list-style-type: none"> ▪ Group meetings with local communities and businesses | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works -During the operational phase of the electricity infrastructure. |
| | <ul style="list-style-type: none"> ▪ Direct communication with residents, businesses etc. | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works -During the operational phase of the electricity infrastructure. |
| | <ul style="list-style-type: none"> ▪ Direct information via a contact person or person responsible for the implementation of the SEP. | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works -During the operational phase of the electricity infrastructure. |
| Governments and regulatory | <ul style="list-style-type: none"> ▪ Official correspondence | <ul style="list-style-type: none"> -Before starting implementation of the project activities -During the construction works |

| Stakeholder group | Engagement Technique | Phase of the projects |
|--|---|---|
| bodies/National institutions | | -During the operational phase of the electricity infrastructure. |
| | <ul style="list-style-type: none"> ▪ Meetings, public hearings | -Before starting implementation of the project activities -During the construction works |
| | <ul style="list-style-type: none"> ▪ One on one meetings | -Before starting implementation of the project activities -During the construction works |
| Non-governmental organizations, business associations and professional organizations | <ul style="list-style-type: none"> ▪ Public consultation meetings, and individual consultation, meetings as necessary | -Before starting implementation of the project activities -During the construction works |
| | <ul style="list-style-type: none"> ▪ Direct email communication | -During the operational phase of the electricity infrastructure. |
| | <ul style="list-style-type: none"> ▪ Media/ press releases. | |
| Contractors, Suppliers, clients, service providers | <ul style="list-style-type: none"> ▪ Information through tender procedure and Contracts | Before starting implementation of the project activities |
| | <ul style="list-style-type: none"> ▪ Communication via supervising engineers | During the construction works |
| | <ul style="list-style-type: none"> ▪ Toolbox talks at construction sites on health and safety topics | During the construction works |
| | <ul style="list-style-type: none"> ▪ Monthly reports on progress of works to be submitted by contractors during construction works | During the construction works |

5.3 Stakeholder Engagement Activities

Stakeholder engagement is the practice of influencing a variety of outcomes through consultation, negotiation, communication, compromise, and relationship building. The SEP seeks to define technically and culturally appropriate approach to consultation, disclosure and grievance redress.

Table 7 below outlines the activities earmarked to engage, consult and provide relevant project information to project stakeholders throughout project preparation, implementation and subsequent operations. Stakeholder engagement will be a continuous process and the consultations thus far are not final but will be ongoing throughout the life cycle of the project.

Table 7: Stakeholder Engagement Activities

| Project Stage | Topic of consultation / message | Engagement Technique | Appropriate application of the technique/measures | Target Stakeholders | Institutional Responsibility |
|----------------|---|---|---|--|---|
| Preparation | <ul style="list-style-type: none"> Agreeing on components and institutional arrangements and E&S mitigation measures for Enhancing Sierra Leone Energy Access Project Risk, mitigation and management | <ul style="list-style-type: none"> Correspondence (Phone, Emails); Formal and informal meetings; specialized agencies dealing with vulnerable groups Radio and Television with sign language interpretation Radio and TV Discussion and Phone-in Programs Engagement with representatives of specialized agencies dealing with vulnerable groups WhatsApp calls and video messaging Print and electronic media Posters and brochures | <ul style="list-style-type: none"> Stakeholder invitation to meetings Contribution of stakeholders and feedback Dissemination of information to all stakeholders and public Training in environmental and social issues | <ul style="list-style-type: none"> Ministry of Energy EDSA Relevant MDAs World Bank Group NGOs/CSOs Ministry of Social Welfare, Gender and Children's Affairs All stakeholders General public District and Local Councils PAPs, Elderly persons Illiterate people Persons with disabilities Direct beneficiaries | <ul style="list-style-type: none"> MoE EDSA |
| implementation | Plan project implementation and strategies for District and Local Council involvement | <ul style="list-style-type: none"> Correspondences (Phone, Emails); Formal and informal meetings Radio and Television Discussion and Phone-in Programs | <ul style="list-style-type: none"> Invite stakeholders to meetings and follow-up Soliciting stakeholder input into the project preparation, land | <ul style="list-style-type: none"> Ministry of Energy EDSA Contractors World Bank Group Ministry of Energy | <ul style="list-style-type: none"> MoE EDSA Contractor |

| | | | | | |
|---|--|--|---|--|--|
| | <p>Site preparation and clearing</p> <p>Project environmental and social risk identification (noise, dust, air pollution, loss of land, soil erosion, runoff, waste generation, health and safety), mitigation and behavioural change</p> <ul style="list-style-type: none"> • Disclosure of safeguards instruments | <ul style="list-style-type: none"> • Ministry of Energy Website http://www.energy.gov.sl/ and EDSA website https://www.edsa.sl/ • Print and electronic media • Call centres) | <p>acquisition, RoW issues and general safeguards issues</p> <ul style="list-style-type: none"> • Seeking views and opinions of PAPs • Enable stakeholders to speak freely about project related issues • Build public trust and confidence • Resolve concerns and grievances as appropriate • Present project information and progress updates; • Disclose ESMF, ESMP, RAP, SEP, GRM and other relevant project documentations • Training in environmental and social issues • Implementation of ESMP and GBV plan | <ul style="list-style-type: none"> • Ministry of Social Welfare, Gender and Children's Affairs • Security forces • Relevant MDAs • General public • District and Local Councils • PAPs, • Elderly persons • The homeless • Illiterate people • Persons with disabilities • The homeless • Direct beneficiaries • Contractor • Impacted Communities, • Persons with disabilities • Elderly persons • Illiterate people | |
| <p>Construction of substation and Transmission and Distribution lines</p> | <ul style="list-style-type: none"> • T & D design • Land acquisition and preparation • Transport of equipment to site | <ul style="list-style-type: none"> • Formal meetings • Correspondences (Emails, Phones/WhatsApp) • Site visits | <ul style="list-style-type: none"> • Present Project information to stakeholders • Allow stakeholders to comment - opinions and views | <ul style="list-style-type: none"> • Ministry of Energy • Ministry of Lands • SLRA • Contractors • Land owners | <ul style="list-style-type: none"> • MoE • EDSA • Contractors |

| | | | | | |
|---|--|--|--|--|--|
| | <ul style="list-style-type: none"> • Clearing RoW/ tower route for safety of vendors • Construction of substations • Stringing of lines and cables • Install new transformers, generators, solar and other equipment | <ul style="list-style-type: none"> • Public Address Systems • Press statements/public notices • Public disclosure • Posters/flyers • Workshops | <ul style="list-style-type: none"> • Disseminate technical information • Record discussions and decisions • Training in environmental and social issues • Adopt Safety procedures | <ul style="list-style-type: none"> • PAPs • SLRA • District and local councils • Ministry of Social Welfare, Gender and Children's Affairs | |
| Operation and maintenance of Transmission and Distribution Lines and Right Of Way | <ul style="list-style-type: none"> • Vegetation loss and control • Loss of income from fruit trees • Maintenance of ROW and construction site • Tower maintenance and EMF issues • Adequate supply of PPEs and waste management | <ul style="list-style-type: none"> • Formal meetings • Correspondences (Emails, Phones/WhatsApp) • Site visits • Public Address Systems • Press statements/public notices • Public disclosure • Posters/flyers • Workshops | <ul style="list-style-type: none"> • Present Project information to stakeholders • Allow stakeholders to comment - opinions and views • Disseminate technical information • Record discussions and decisions • Training in environmental and social issues • Adopt Safety procedures | <ul style="list-style-type: none"> • Ministry of Energy • SLRA • Contractors • Land owners • PAPs • SLRA • District and local councils • Ministry of Social Welfare, Gender and Children's Affairs | MoH EDSA SLRA District and Local Councils |

5.4 Stakeholder Engagement Resources and Responsibilities

5.4.1 Responsibilities

The successful implementation, management and coordination of the project will depend on EDSA, MoE and PIU, the capacity within the institutions, and appropriate and functional institutional arrangements.

The Project Implementation Team (PIT) will be responsible for the preparation and physical implementation of the project. The team will benefit from the services of specialized consultants with experience on World Bank Projects. This unit will be under the oversight of the Deputy Director General Manager, comprising the following staff:

Project Coordinator: responsible for the overall management of the project and the day to day coordination of the various components.

Senior Procurement Specialist: will be responsible for all procurement and contract management of the project.

Financial Management Specialist: an experienced individual supported by a finance assistant will be responsible for all financial transactions including withdrawal applications, Bank Guarantee and provide guidance on all financial matters of the project.

Project Engineer: a supervision engineer responsible for the monitoring of the implementation of the project. S/he will work closely with other members of the PIT.

Environmental and Social Management Unit

There is no well-structured environmental and social unit at EDSA but the embedded consultant will work to support the establishment and training of the ESMU at EDSA. The Environmental and Social Safeguards Unit will be responsible for the implementation of the SEP.

The ESMU will comprise of the following specialists:

Senior Environmental Specialist: responsible for the overall environmental and social safeguards of the project and works closely with the gender and social development specialist. Provides leadership, guidance, project level information on safeguards for all stakeholders, and ensure the adequacy of ToRs for safeguards consultancies. Overseeing all environmental and social safeguards training and capacity building.

Gender and Social Development Specialist: will be responsible for all social and gender related issues. S/He will oversee all stakeholder engagement, manage the GRM and liaise with all project managers to ensure requirements are understood and followed.

Environmentalist: This Environmentalist position is currently the only person responsible for all safeguards issues at EDSA and will work closely with the Senior Environmental specialist to receive additional training. The Environmentalist will form an integral member of the ESMU to be established at EDSA.

5.4.2 Resources

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of the Environmental and Social Management Unit (ESMU) of the Project Implementation Unit. The Gender and Social development Specialist will provide management oversight of SEP and will work closely with the Senior Environment Specialist and the PIT for expertise in their different functions to ensure a successful implementation of the SEP.

i) Training

Training will be organized for all personnel involved in the implementation of the SEP. The Gender and Social Development officer and field team will be given additional training and capacity building on the SEP and the GBV/SEA through workshop that will be organized by EDSA. The environmental and social officer of the contractors will also be trained on SEP especially on GRM and GBV/SEA

ii) Budget

The estimated budget for the implementation of the SEP is \$25,000, specific activities will be submitted to EDSA, and the ESLEAP in time for approval before the activities are conducted. To facilitate planning, design and implementation of the project, meetings will be held with various stakeholders of the project.

Table 8: Budget Estimate for Stakeholder Engagements and Disclosures

| No | Description | No of units /people | Unit Cost (Le) | Total Cost ('000) | USD |
|-----------|---|----------------------------|-----------------------|--------------------------|------------------|
| 1 | Hall rentals for Public engagements and disclosure for 9 towns | 36 | 500,000 | 18,000 | 1,803.02 |
| 2 | GRM Meetings for Towns | 9 | 2,000,000 | 18,000 | 1,803.02 |
| 3 | Food and drinks | 1000 | 40,000 | 40,000 | 4,006.71 |
| 4 | Local Councilors for support to disclosure | 450 | 100,000 | 45,000 | 4,507.55 |
| 5 | Project Affected Persons/stakeholders | 200 | 30,000 | 6,000 | 601.00 |
| 6 | Launch of project (hall rental, food, publicity, printing and transportation) | 18 | 5,000,000 | 90,000 | 9,015.10 |
| 7 | Media houses print and electronic | 36 | 100,000 | 3,600 | 360.60 |
| 8 | Paramount Chiefs | 36 | 150,000 | 5,400 | 540.91 |
| 9 | Stationary | 18 | 1,000,000 | 18,000 | 1,803.02 |
| 10 | Contingency | 1 | 2,126,000 | 2,126 | 212.96 |
| | Grand Total | | | 246,126 | 24,653.89 |

Note: Exchange rate as at September 2020 = **9.983.25**

6.0 GRIEVANCE REDRESS MECHANISM

A comprehensive project wide GRM will be instituted to enable a broad range of stakeholders channel their concerns, questions, and complaints to the various implementation agencies, through multiple grievance uptake channels.

The mechanism details the processes involved in registering grievances at no cost to the complainant. Grievance resolution procedures is in place with the sole objective of minimizing disputes that may arise in relation to the project design and implementation. Each tier of the complaint should be addressed within two weeks of feedback and action. If unresolved, the complaint is moved to the next tier with the complainant having the option of seeking redress in the courts of Law.

The ESURP has a finalized and operational GRM (Figure 3) including log sheet (Annex 2) for both the parent ESURP and the Additional Financing which will be adopted for ESLEAP. The mechanism will be updated appropriately for the Enhancing Sierra Leone Energy Access Project to establish digital platforms and accommodate emerging issues around GBV (SEA/SH) for confidential reporting and referral to service providers.

The web application will be housed at MOE and provides access to EDSA and contractors to register complaints received at sub-project level or the field. It also provides channels for direct complaints from the general, project stakeholders, PAPs etc. to complain directly. The safeguards specialist at MOE will man the platform to ensure timely sorting and escalation of grievances to resolving officer. Local level structures will include the councilors and GBV service providers that will support grievance receipt and escalate to contractors, EDSA or MOE as appropriate for resolution. The project will identify an NGO GBV service provider to setting up and ethically manage SEA/SH complaints. Each tier of the complaint should be addressed within two weeks of feedback and action. If unresolved, the complaint is moved to the next tier with the complainant having the option of seeking redress in the courts of Law. The important lesson is to have a practical, functional mechanism that can respond to complaints in a timely manner.

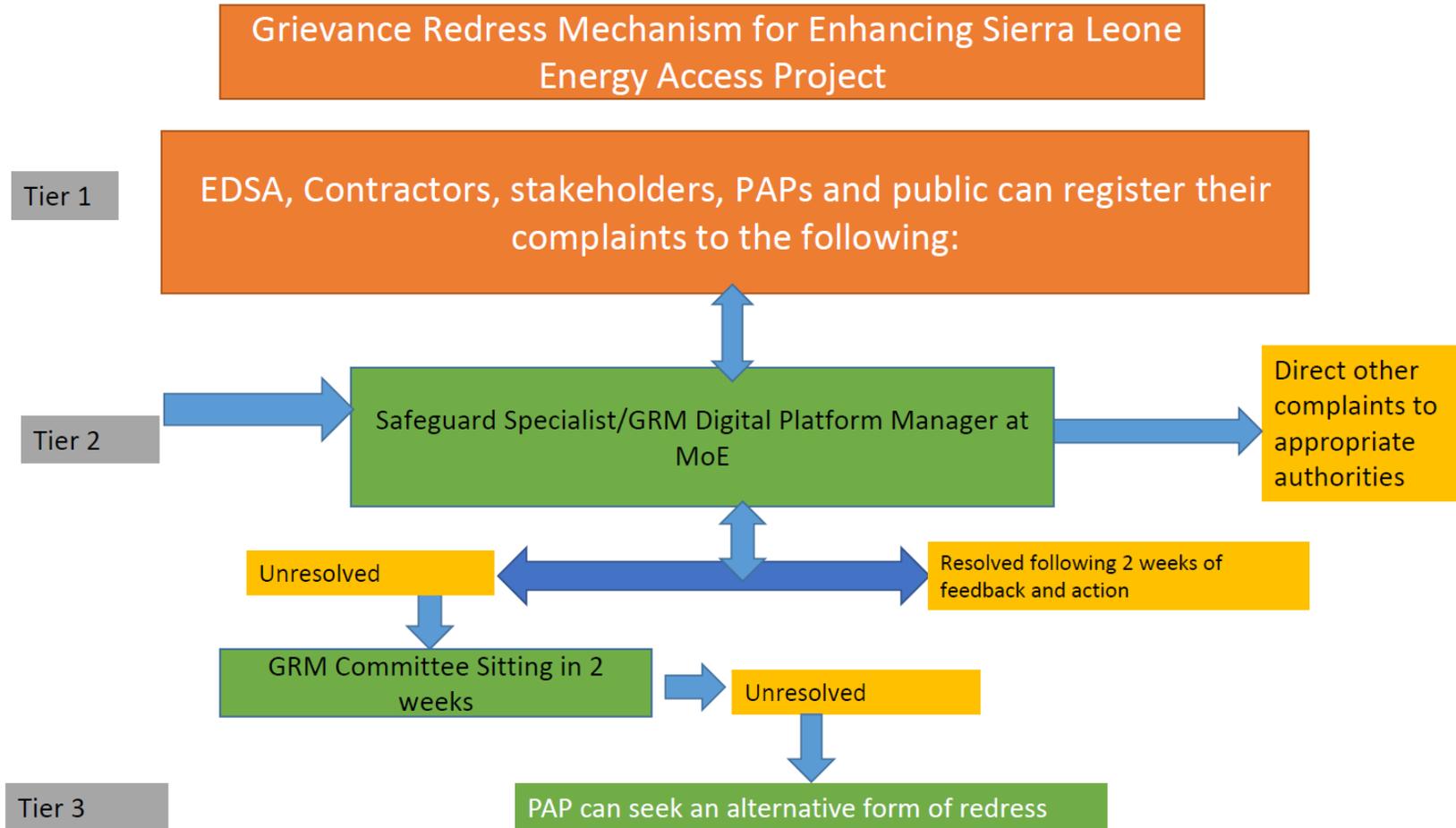


Figure 3: Grievance Mechanism for ESLEAP adapted from GRM for ESURP and EAP

7.0 MONITORING AND REPORTING

Monitoring and reporting is a key component of the SEP. EDSA shall adopt a participatory monitoring and evaluation system to ensure that the ESMU is able to bring to the fore the active participation of all stakeholders and respond to identified issues and alter schedules and the nature of engagement activities to make them more effective. The effective involvement of stakeholders in the monitoring and evaluation process will enhance acceptance of the project and improve sustainability of the project. Arrangements for monitoring of the engagement process by EDSA and supplemented by independent monitors to ensure complete and objective information, performance monitoring indicators, and outcomes for engagement activities that involve all key stakeholders in the monitoring process shall be completed. The monitoring would include tracking of the commitments made to stakeholders at various stages of the plan and inform them of progress on those commitments. The successful implementation of the SEP will hinge on the following:

- A clearly defined methodology
- Adequate resources
- Transparency and accountability
- Inclusiveness of all key stakeholders
- Trust in EDSA
- Awareness to promote stakeholder engagement

Early short-term monitoring would be done and adjustments made during engagement. This would be followed by review of the outputs at the end of the engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed as part of the SEP and presented in Table 9. Stakeholder engagement activities will continue through the project life cycle. Therefore, the review of ESIA and other safeguards instruments by all key stakeholders including the vulnerable would be conducted to the end of the project.

Table 9: Key Performance Indicators for Monitoring Framework

| Phase activities | | | | |
|---|---|------------------|-------------------|--|
| Indicator name | Description/definition | Frequency | Datasource | KPI |
| Project development and initial consultations | Share update and consult with key stakeholders on the project | Quarterly | Project reports | Affected communities in the project Districts and Freetown consulted including women and vulnerable people Preliminary stakeholder information gathered |
| Planning for construction | Share updates on project | Quarterly | Project reports | Public disclosure done, Billboards up |
| Safeguards Instruments/ESIA Implementation | Share updates and ESFM, RF, SEP, ESCP, ESMP, CESMP and disclosure of instruments | Quarterly | Project reports | Safeguards instruments ESMF, RF, SEP, ESCP, ESIA developed and safeguard instruments developed and disclosed on EDSA and MoE websites and with EPA. Publicly disclosed with participation of all stakeholders. Communities provided feedback |
| | Contract preparation with appropriate safeguard language | Once | Project reports | EDSA to include provisions on Bidding Documents drawing on from safeguards instruments |
| | Full complement of safeguards staff identified and recruited to provide implementation support. Contractors prepare their CESMP | Biannually | Project reports | EDSA/PIT ESMU strengthened CESMP prepared and implemented |
| | GRM implementation and percentage of cases received and resolved | Quarterly | Project reports | Number of complaints received; logged; resolved; pending and reported; Number of complaints referred to other organisations Number of complaints submitted by age and gender of complaint |
| | Female beneficiaries and vulnerable people | Quarterly | Project reports | Reports on number of females engaged and number of vulnerable people |
| | Develop standard reporting forms for monthly, quarterly and annual reports | Quarterly | Project reports | Number of monthly, quarterly and annual reports received. |

| | | | | |
|--|--|--|--|---|
| | for consultations, update on GRNGRM, training. Compliance monitoring checklist prepared and in use by contractors and the PIT | | | ESIA/EFM, RF, ESMP to guide management and monitoring process |
|--|--|--|--|---|

7.1: Reporting Stakeholder Engagement Activities

Performance will be reviewed periodically and updated following engagement sessions conducted in the field. Any major changes to the project related activities and schedule will be duly reflected in the SEP. Monthly summaries and reports on ESIA, grievances, enquiries and reports on status of implementation of associated and corrective actions will be done and collated by responsible staff for the attention of the senior management of the EDSA.

Evaluation of performance will be done to determine the extent to which the engagement activities and outputs meet those in the SEP. The following will be considered during assessing performance:

- Materials disseminated: Types, frequency, and location;
- Venue and time of engagement and participation including specific stakeholder groups (women, community leaders and youth);
- Attendance (number attending public or formal meetings);
- Meeting minutes with attendance registers and photographic evidence;
- Comments received on specific issues; types of stakeholder and details of feedback provided;
- Number and type of stakeholders meeting the team by phone, email and other means;
- Comments received and passed on to the project by community leaders, government and other stakeholders;
- Number and type of feedback/grievances and the nature and timing of resolution
- Extent to which feedback and comments are addressed and led to corrective measures

ANNEXES

Annex 1: Initial Stakeholder Engagement Meeting Report

| | |
|--|---|
| Purpose/Objective | Port Loko District engagement meeting with stakeholder from District Council and CSOs |
| Date | 4 th September 2020 |
| Time | 13:15 to 2:30 |
| Venue | Port Loko District Council and Offices of CSOs |
| Agenda | Senior Environmental Specialist and Feedback by All |
| 1. Prayers and Description and | |
| 2. Project Goals and Objectives | |
| 3. Project potential impact | |
| 4. Stakeholder identification and engagement | |
| 5. Project impact mitigation | |
| 6. Feedback and questions | |
| 7. Closing | |

1. Opening Prayers and opening prayers

The Chief Administrator welcomed me to their office and I briefed them on the project scope and description. The project components were discussed.

2. Project goals and objectives

The goal of this SEP is to improve and facilitate decision-making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

The general objectives were also highlighted

- Understand the stakeholder engagement requirements
- International Best Practice;
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation;

- To assess the level of stakeholder interest and support for the project and to ensure their views are taken into account in the design and environmental and social performance
- Develop a stakeholder's engagement process that provides stakeholders with an opportunity to engage in project planning, design and its implementation;
- Establish formal grievance redress mechanisms;
- Define roles and responsibilities for the implementation of the SEP;

3: Project Potential Impacts

The impacts range from environment, socio-cultural from equipment mobilization, materials etc. Construction phase impacts will be mostly transient and include:

- Noise from truck movements and machinery
- Emissions from vehicle exhausts
- Dust emission from haulage of sand
- Damage to road surfaces and dust generation where roads are not paved
- Possible road accidents including falling objects from trucks.
- Vehicular pedestrian conflicts
- Exposure of soils to erosion and degradation from runoff
- Sediments and runoff from exposed soil surfaces polluting receiving water bodies
- Loss of use of land in RoW by existing users
- Waste Generation and management
- Chance archaeological finds during excavations
- Loss of use of land in RoW
- Potential impact on spread of HIV, Covid-19
- GBV issues
- Impacts on vegetation and avifauna
- Substation security and cable theft

5. Project impact mitigation principles discussed include

- Mitigation principles for the effects of land ownership, property and loss;
- Mitigation principles on impact of noise;
- Prevention of Impact on Public/ community Health and Safety principles;
- Prevention of Impact on Occupational Health and Safety principles;
- HIV/ AIDS prevention and management principles;
- COVID 19 Control and mitigation principles;

- Socio-cultural conflict prevention principles;
- Gender, GBV (SES/AH) mitigation principles;
- Substation, Cable theft/security principles.
- Chance find procedure principles
- Population influx control principles;
- Air quality control principles;
- Explosion control and health and safety principles;

To provide transparency, and ensure key members feel engaged in the process EDSA will:

- Involve community leaders such as chiefs, opinion leaders and district and local council members in the land acquisition process;
- Collaborate with MDAs
- Collaborate with NGOS to ensure members of the community fully understand the benefits of the Project and are properly informed about its various aspects.
- Liaise with the Town and Country Planning department to ensure that all future related developments of the project are within the area designated by the Council
- Assist the planning unit of the Council to undertake proper planning and their allocation of zone for specific development schemes in the communities.
- Ensure compensation rates for land-owners reflect replacement cost;
- Educate affected community members on the alternative forms of livelihood available to them, and provide support to ensure a smooth transition to these alternative livelihoods.

6. Feedback and Discussions

The participants were delight at the project and urged the involvement of the District and Local Councils, CCG, Women's groups in the project cycle. They recommended the employment of women and especially using the structures at the District Councils to help on safeguards compliance and overall project implementation. Training and employment for especially women was emphasized by the CCG Regional Women's Coordinator. She also requested that meters be made available at affordable cost especially for women whose lives and livelihoods would be greatly enhanced with affordable and sustainable electricity.

In Pujehun, the district Council representatives including the Chief Administrator called for equitable distribution, oversight of projects including SLEP, sustainability through

involvement and ownership of the community/stakeholders, sensitization for all especially because of problems with theft of properties (he lamented the damage to the solar street lights because most of the batteries have been stolen), and training.

Youth employment and training for youth and women were strongly emphasized in Pujehun by the District Youth officer.

The Chieftom Speaker, Town Chief, and the Chairman of the Pujehun Districts Descendants Association were also very delighted and expressed their commitment to support the project and would be happy to help resolve land access and ownership issues. The Chairman of the Civil Society Organizations also expressed delight and looked forward to working with the various stakeholders. The District Medical Officer looked forward to the project and mentioned to us that the hospital especially the Covid-19 Isolation Unit had a generator running all the time to help patients and also have a dedicated generator for the other Wards and another one is always on for surgeries. Although he was pleased to have the current arrangement, but he did say a more sustainable supply would be welcomed.

Attendance list for meetings in Port Loko, Kambia and Pujehun

| Name | Designation | Telephone | Email | Signature |
|------------------------------|----------------------------------|-------------|-----------------------------|--------------------|
| 1. Salieu Kanneh | Council Engineer | 078-841909 | Pujehun.D.C | <i>[Signature]</i> |
| 2. Ibrahim Kalim Sesay | Gender Officer | 078-192525 | ibrahimkalimsesay@gmail.com | <i>[Signature]</i> |
| 3. Moriba Bayba Kabbba | WASH Engineer | 079357992 | Moribakabbba@gmail.com | <i>[Signature]</i> |
| 4. Timothy A Kamara | Environmental and Social Officer | 079416468 | timothykamara794@gmail.com | <i>[Signature]</i> |
| 5. Sahr E. Yamba | Chief Administrator | 076-414363 | Sahryambaw751@gmail.com | <i>[Signature]</i> |
| 6. Abdul Gassim Darany | District Youth officer | 088919806 | Abdulgassimdorany@gmail.com | <i>[Signature]</i> |
| 7. Sylvester M. Kamata | Chieftom Speaker, Kpangya | 076-958-287 | | <i>[Signature]</i> |
| 10. Chief Muskepha B. Korrma | Town Chief, Pujehun | -076 894652 | | <i>[Signature]</i> |
| 11. Patrick Ansu Keurkai | Chairman PDDA | -076 601444 | | <i>[Signature]</i> |
| 12. Ibrahim B. Swaray | Chairman CSO | 076439327 | Swaray99@gmail.com | <i>[Signature]</i> |
| 13. Dr. SAMBA JALLOH | Medical Officer | 076452726 | smbjallohgshead@gmail.com | <i>[Signature]</i> |
| 14. Ahussem B. Jalloh | NCRA | 075012102 | bashjy10@gmail.com | <i>[Signature]</i> |

| Name | Designation | Email | Telephone |
|-----------------------|-----------------------------|-------|--|
| Alhaji Alhaji Bangura | C.A. Port Loko Dist Council | | 078 987816 bancalhajjal@gmail.com |
| Cecilia F. Sany | ESD PLDC | | 076-758249 ceciliajaneh@gmail.com 08 27676 kassa.isha@yahoo.com |
| Aisha Mariam Kaba | Gender Officer | | 076917988 Mariatsongokanu@gmail.com |
| Mariatu Songo-Kanu | Reg. women's Coord | | |
| Mohamed Kauru | CGG (Chairman CSO) | | 07695569/0783091 - MedKamondo@gmail.com |

Kambia

Mohamed M. Suresh - Deputy Chairman K. D. C 099841150
 099-653565
 - M'Anne Pessier - Valuation Officer Kambia Dist. Council - 076767808

Annex 2: ESLEAP Grievance Resolution Procedure and Complaints Log Sheet

The GRM will be a project wide GRM and will be available for use by all project stakeholders including those directly and indirectly impacted, positively or negatively. This will offer an opportunity to project affected persons to submit questions, concerns/complaints, comments, suggestions and obtain resolution or Feedback.

MOE will provide oversight to GRM process in coordination with EDSA, contractors, local councilors and the GBV service provider (NGO). A web application will be housed at MOE and provides access to EDSA and contractors to register complaints received at sub-project level or the field. Complaints can also be made to the local councilor who will then channel the complaint to EDSA, MOE or contractors to be filed in the digital platform for tracking of resolution. Complaints from the general, project stakeholders, PAPs etc. may also be made directly through the digital platform either by calling, sending text, whatsapp etc. The project will identify an NGO GBV service provider to setting up and ethically manage SEA/SH complaints.

The GRM implementation process will involve the following steps:

- The safeguards specialist at MOE will man the platform to ensure timely sorting and escalation of grievances to resolving officer
- Assign a focal person (s) from ESDA, Contractors and Councilors for component and community level grievance uptake and reporting
- Train assigned focal person (s) to receive and log complaints in the GRM Database;
- Constitute GRM Committee to resolve grievances
- Screen, classify and refer complaints to appropriate unit for redress
- Monitor, track and evaluate the process and results
- Provide feedback to complainant within two weeks, and an opportunity for appeal if not satisfied with resolution approach

COMPLAINTS LOG SHEET

**Enhancing Sierra Leone Energy Access Project
Ministry of Energy**

NAME OF COMPLAINANT.....
Address
Date of Complaint.....
Subject of Complaint
(If complaint is more than 50 words, please prepare separately and attach to this form)

.....
.....
.....

NAME OF COUNCILLOR (Ward)/ESMS/SUPERVISING ENGINEER/GRM IC MEMBERS.....

Address
Date Complaint Received
Comments/Recommendations
.....
.....
.....

I am satisfied with this recommenda
I am **not** satisfied with this recommend

Date

Signed Name.....
Complainant
Signed Name
Councilor

GRM IMPLEMENTATION COMMITTEE (GRM-IC)
.....

Meeting Location

.....

Date Complaint Received

.....

Comments/ Recommendation

.....

.....

.....

.....

.....

.....

.....

I am satisfied with this recommendation/ I am **not** satisfied with this recommendation

Signed..... Name

.....Complainant

Date

.....

Signed Name Committee
Chair

SignedName ESMS,
ESLEAP

ALTERNATIVE FORM OF REDRESS

NAME OF LEGAL REPRESENTATIVE

Address

.....

Date Complaint Received

.....

Comments/Recommendations

.....

.....

.....

.....

I am satisfied with this recommendation/ I am **not** satisfied with this recommendation

Signed Name Complainant

Date
Signed Name Legal
Representative

NAME OF COURT

.....
Address

.....
Date Complaint Received

.....
Court ruling

.....
.....

.....
I shall abide by this ruling

Signed.....Name
.....Complainant

Date