RURAL ELECTRIFICATION AGENCY

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

THE NIGERIA ELECTRIFICATION PROJECT PHASE II (NEP 2) - DESERT TO POWER (DTP)

June 2026

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LIST OF ACRONYMS AND ABBREVIATIONS

AfDB	African Development Bank
aRAP	Abbreviated Resettlement Action Plan
BPP	Bureau of Public Procurement
CDA	Community Development Association
C-ESMP	Contractor Environmental and Social Management Plan
CLO	Community Liaison Officer
CoC	Code of Conduct
CSO	Civil Society Organisation
DISCO	Distribution Company
DtP	Desert to Power
E&S	Environmental and Social
EEP	Energizing Education Programme
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ES	Executive Summary
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ETP	Energy Transition Plan
FGD	Focus Group Discussion
FGN	Federal Government of Nigeria
FMEnv	Federal Ministry of Environment
FMoF	Federal Ministry of Finance
FMoP	Federal Ministry of Power
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
IMG	Interconnected Mini-Grid
IRM	Independent Recourse Mechanism
ISS	Integrated Safeguards System
IVA	Independent Verification Agent
LGA	Local Government Area
MDA	Ministry, Department and Agency
MSME	Micro, Small and Medium Enterprise
MST	Minimum Subsidy Tender
NDC	Nationally Determined Contribution
NEMA	National Emergency Management Agency
NEMSA	Nigerian Electricity Management Services Agency
NEP	Nigeria Electrification Project
NERC	Nigerian Electricity Regulatory Commission
NESREA	National Environmental Standards and Regulations Enforcement Agency
NGO	Non-Governmental Organisation
NUC	National Universities Commission
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
OS	Operational Safeguard
OS10	Operational Safeguard 10

PAP	Project-Affected Person
PBG	Performance-Based Grant
PDO	Project Development Objective
PHC	Primary Healthcare Centre
PMU	Project Management Unit
PUE	Productive Use Equipment
PWD	Person with Disability
RACI	Responsible, Accountable, Consulted and Informed
RAP	Resettlement Action Plan
REA	Rural Electrification Agency
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
VAPP	Violence Against Persons Prohibition

EXECUTIVE SUMMARY

ES1. Project Context and Purpose of the SEP

The Desert to Power (DtP) Project in Nigeria builds on the implementation experience of the Nigeria Electrification Project (NEP), launched in 2018 as the Federal Government's flagship off-grid energy access programme. The earlier programme combined public and private financing to expand clean, reliable and affordable electricity access for rural and underserved populations, while supporting MSMEs, public institutions and essential services. The proposed DtP Project continues this direction as a national electrification programme to be implemented by the Rural Electrification Agency (REA), with subprojects that may be spread across different states, communities, institutions and productive use locations.

The Project Development Objective is to increase access to reliable, clean and sustainable electricity services for households, Micro, Small and Medium Enterprises (MSMEs), productive users, public tertiary educational institutions, healthcare facilities and associated public service delivery institutions through distributed renewable energy solutions and related technical assistance. The project is structured around four components: Interconnected Mini-Grids and Productive Use Equipment (PUE), Energizing Healthcare Facilities, Energizing Education Programme for Federal Universities, and Technical Assistance, Capacity Building and Project-wide Environmental and Social Management. Indicative financing for the DtP Project is USD 700 million, with USD 120 million for interconnected mini-grids and productive use support, USD 175 million for healthcare facilities, USD 375 million for public institutions including federal universities and associated health facilities, and USD 30 million for technical assistance, capacity building and project-wide environmental and social management support.

Component 1 will be implemented mainly through private developers and will cover interconnected mini-grids as well as Productive Use Equipment to support productive and income-generating uses of electricity by MSMEs, smallholder farmers, farmer cooperatives, agro-processors, traders and other productive users. Components 2 and 3 will be implemented mainly through contractors, including EPC contractors, to provide reliable power solutions for healthcare facilities, federal universities and associated teaching hospitals. Component 4 will support REA, the PMU and related institutions through technical assistance, institutional strengthening, project-wide ESMP implementation support, E&S consultancy services, audits, third-party compliance monitoring, safeguards supervision, stakeholder engagement, grievance management, capacity building and reporting.

The Stakeholder Engagement Plan (SEP) has been prepared as a practical framework for how stakeholders will be identified, informed, consulted and kept engaged across the full project lifecycle. It is both a safeguards compliance instrument and a management tool for day-to-day engagement. Its purpose is to support informed participation, strengthen transparency and accountability, improve stakeholder confidence, avoid and reduce misunderstanding and conflict, and provide accessible routes for feedback and complaints. The SEP is prepared in line with applicable Nigerian legal, policy and institutional requirements, and with the African Development Bank's Integrated Safeguards System, particularly Operational Safeguard 10 on Stakeholder Engagement and Information Disclosure.

ES2. Legal, Policy, Institutional and Stakeholder Identification Framework

The SEP is anchored in applicable Nigerian legal and regulatory instruments relating to public disclosure, environmental assessment, electricity sector regulation, land access, physical planning, labour and working conditions, public health and safety, gender and disability inclusion, protection from violence and abuse, data protection, public procurement, climate change and renewable energy development. Relevant instruments include the Constitution of the Federal Republic of Nigeria, the Freedom of Information Act, the Environmental Impact Assessment Act, the Electricity Act, the NESREA Act and related environmental regulations, the Land Use Act, the Nigerian Urban and Regional Planning Act, labour and occupational health and safety laws, the Violence Against Persons (Prohibition) Act, the Child Rights Act, the Discrimination Against Persons with Disabilities (Prohibition) Act, the National Health Act, the Nigeria Data Protection Act, the Public Procurement Act and the Climate Change Act.

The policy framework relevant to the SEP includes national policies and strategies on environment, energy access, renewable energy, energy efficiency, energy transition, climate change, gender equality, disability inclusion, labour, public health, emergency preparedness, transparency and procurement. The DtP Project is also aligned with Nigeria's Energy Transition Plan and Nationally Determined Contribution, including the latest NDC 3.0, through its support for distributed renewable energy, reduced reliance on fossil fuel-based self-generation, and improved access to cleaner electricity services.

The institutional framework for SEP delivery includes REA as the lead implementing agency, the Federal Ministry of Power, Federal Ministry of Environment, NESREA, NERC, NEMSA, Federal Ministry of Finance, Bureau of Public Procurement, relevant federal and state ministries responsible for lands, planning, education, health, women affairs, disability inclusion, labour, emergency management and data protection, as well as State Ministries of Environment, Local Government Authorities and relevant traditional/community leadership structures. These institutions will support disclosure, permitting, regulatory coordination, environmental and social oversight, grievance escalation and resolution, inclusion of vulnerable groups, technical review, community entry and site-level implementation where their mandates are engaged.

Given that site selection is still being finalised for several components, the SEP adopts a programme-level stakeholder map that will later be deepened through site-specific stakeholder registers and addenda. Stakeholders are grouped into three broad categories: project-affected parties, other interested parties, and disadvantaged or vulnerable groups. This structure is aligned with AfDB safeguards expectations and supports a risk-based and inclusive engagement process.

Project-affected parties include host communities, nearby residents, landowners and occupiers where relevant, facility users, campus users, students, health workers, patients, local businesses, MSMEs, traders, smallholder farmers, farmer cooperatives, agro-processors, irrigation users, productive energy users, workers, and persons or groups who may experience direct or indirect project impacts. Other interested parties include REA and the PMU, AfDB, relevant federal and state MDAs, regulators, DISCOs, private developers, EPC contractors, operators, consultants, universities, teaching hospitals, primary healthcare centres, civil society organizations, faith-based groups, consumer groups, academia, media, emergency services and neighbouring infrastructure operators. Disadvantaged or vulnerable groups may include women and girls, youth, elderly persons, persons with disabilities, low-income households, low-literacy households, minority groups, non-dominant language speakers, internally displaced persons where present, migrant or highly mobile populations, and other groups who may face barriers to participation or access to project benefits.

The SEP gives specific attention to disadvantaged and vulnerable groups that may face participation barriers or be exposed to differentiated project impacts. Adaptive engagement measures include separate focus groups where appropriate, accessible venues, female facilitators where needed, local language support, oral and pictorial communication, mobility support, confidential feedback channels, and the use of trusted intermediaries. The SEP also provides for screening of reprisal, retaliation, SEA/SH, GBV, exclusion and security risks so that people can raise concerns safely and without fear of intimidation or social pressure.

ES3. Engagement and Information Disclosure Approach

The SEP treats stakeholder engagement as a continuous process that starts during preparation and carries through implementation, operation, and any future project modification, decommissioning or major rehabilitation stage where relevant. The engagement model is tiered. At the programme level, engagement will cover national and state actors on project design, safeguards instruments, institutional arrangements, implementation responsibilities, disclosure, grievance management and reporting. At the subproject level, engagement is location-specific and will address site selection, siting, access, likely environmental and social risks and impacts, mitigation measures, works schedules, community health and safety, labour issues, SEA/SH and GBV risks, service arrangements, productive use opportunities, and grievance access.

A mix of methods will be used so that information reaches stakeholders in the forms they can understand and use. These methods include formal meetings, public consultations, workshops, focus group discussions, one-on-one interviews, radio announcements, printed materials, site noticeboards, information centres, phone and digital communication, direct correspondence, stakeholder forums, surveys, helpdesks and grievance uptake points. The approach will be adapted to local context, literacy levels, disability access needs, security conditions, gender dynamics, language requirements, stakeholder category and component-specific realities.

For Component 1, engagement around interconnected mini-grids and Productive Use Equipment will focus on community entry, land-related matters, route alignments, service arrangements, customer communication, affordability, productive use opportunities, smallholder farmers, agro-processors, irrigation users, MSMEs, local employment information, traffic and safety notices, and grievance access. For Component 2, engagement with healthcare facilities will include facility management, health workers, patients, facility users, local authorities and nearby residents, with attention to service continuity, patient safety, emergency access, infection prevention where relevant, safety notices and grievance channels. For Component 3, engagement with universities and teaching hospitals will include management, works departments, student bodies, staff, unions, campus businesses, hospital users, host communities and security teams, with emphasis on construction timing, access control, safety, service continuity and grievance access. For Component 4, engagement will focus on sector actors, REA teams, implementing partners, consultants, market participants, institutions and service providers involved in implementation, capacity building and learning.

The preparation of subsequent Environmental and Social Assessment instruments, including ESIA, ESMP, RAP/aRAP and other site-specific management plans, shall reflect the component-specific stakeholder engagement scope described above. The ToRs for such instruments shall require consultation with the relevant stakeholder groups for each component, documentation of issues raised, and integration of stakeholder feedback into the assessment, mitigation measures, management plans and disclosure processes.

The disclosure approach in the SEP is practical and trigger based. Draft and final E&S instruments, including the SEP and site-specific instruments where applicable, will be disclosed in line with AfDB ISS requirements, applicable national disclosure requirements and project preparation timelines, and early enough to allow stakeholders to review information and provide meaningful feedback before key project decisions, mobilization or works commence. Once site shortlists are confirmed, site-specific stakeholder registers and local consultation planning will begin. Before mobilization, site-specific disclosure and consultation will cover likely impacts, mitigation measures, access arrangements, works schedules, safety measures, grievance channels and responsible contact persons. Disclosure channels will include the REA website and related digital platforms, printed copies at designated public locations, site notices, radio and local announcements, meetings, focus groups, direct correspondence and other locally appropriate channels. REA will also maintain a feedback loop through periodic “you said / we did” summaries or equivalent feedback notes showing how stakeholder inputs were considered.

ES4. Grievance Redress Mechanism

The SEP presents the grievance mechanism as a central part of the stakeholder engagement system rather than a separate administrative task. The GRM is intended to receive complaints, questions, feedback and suggestions in a simple and accessible manner, resolve issues early and as close to the source as possible, track recurring concerns, and provide a fair process with documented timelines and outcomes. It applies to communities, institutions, service users, businesses, civil society, productive users, facility users, campus users and other external stakeholders. Separate worker grievance arrangements will also be established through labour management provisions and contractor/developer obligations, and these will operate alongside the external project GRM. The project GRM will not replace or limit access to statutory remedies, the courts, regulatory complaint channels or the African Development Bank’s Independent Recourse Mechanism.

Grievances may be submitted through face-to-face reporting, phone lines, SMS, WhatsApp where applicable, email, online or physical grievance forms, walk-ins, suggestion boxes, community meetings, site visits, contractor/developer site offices, REA PMU, Community Liaison Officers, institution focal persons, local government offices, traditional/community leaders, women/youth/disability focal points, and other agreed local uptake points. Anonymous complaints may also be made through channels that do not require the complainant to disclose their identity. The project-specific toll-free telephone/SMS line, dedicated grievance email address, website link or online grievance form link will be inserted in the final SEP once the GRM platform and contact details are confirmed.

The grievance process includes receipt, logging, initial screening, acknowledgement, review, verification, response development, approval, implementation, communication of outcome, closure and learning. Anonymous grievances will be logged and assessed based on the information provided and investigated to the extent possible without attempting to identify the complainant. Resolution is structured across three levels: site or component level, REA PMU level, and senior review, independent mediation or other agreed escalation route for complex or contested matters.

Sensitive complaints, including sexual exploitation and abuse, sexual harassment, gender-based violence, discrimination, intimidation, retaliation and reprisal, will be handled through confidential, safe and survivor-centred procedures. Such complaints will be managed based on informed consent, confidentiality and survivor safety, with referral to appropriate service providers where the survivor wishes. Sensitive cases will be recorded in a restricted register, and general reporting will use anonymized information only.

ES5. Institutional Roles, Resources and Capacity

REA is the lead implementing agency and holds primary accountability for SEP implementation at programme level. Within REA, the PMU will coordinate SEP implementation, with the Social Safeguard Specialist or SEP Lead serving as the primary interface for stakeholder engagement and the GRM Officer managing grievance receipt, logging, tracking, escalation and analysis. REA will appoint an SEP Lead and, where needed, Community Liaison Officers or site focal persons for subproject clusters and project locations.

The SEP implementation arrangement has been designed using the Responsible, Accountable, Consulted and Informed (RACI) method. REA/PMU will remain accountable for overall SEP implementation, compliance oversight, disclosure and reporting. The Social Safeguard Specialist/SEP Lead will be responsible for day-to-day coordination of stakeholder engagement, stakeholder mapping, consultation planning, vulnerable group inclusion, reporting and supervision of site-level engagement. The GRM Officer will be responsible for grievance intake, logging, tracking, escalation and reporting. Private developers, EPC contractors and operators will be responsible for implementing site-level engagement and grievance uptake duties within their scope of work. Universities, teaching hospitals, primary healthcare centres and facility managers will support internal user communication, access, safety notices and issue resolution within beneficiary institutions. Federal and state MDAs, regulators, local authorities, traditional/community structures, CSOs and vulnerable group representatives will be consulted or involved where their mandates or roles are relevant. AfDB will review, advise and supervise SEP implementation as part of its environmental and social due diligence and project supervision role.

The SEP also includes a capacity-building framework. Before field implementation starts, project staff and site teams handling engagement or grievances will receive practical training on stakeholder mapping, plain language communication, vulnerable group inclusion, retaliation risk awareness, grievance handling, SEA/SH survivor-centred response, confidentiality, documentation, data protection and reporting. Refresher training will be undertaken during implementation based on supervision findings, grievance trends, field performance and emerging risks.

A dedicated SEP budget of USD 850,000 is allocated under the Technical Assistance component to support stakeholder engagement activities, disclosure materials, grievance systems, staffing support, stakeholder forums, media outreach, documentation, capacity building, sensitization, field logistics, toll-free grievance channels and related implementation requirements. The budget is informed by lessons from the predecessor NEP programme but is presented as the estimated resource requirement for implementing the DtP SEP across programme-level and site-level activities. In addition, project-wide ESMP implementation support will be earmarked under Component 4, while site-specific ESMP and Contractor ESMP implementation costs associated with Components 1, 2 and 3 will be embedded in the relevant component budgets, developer obligations, contractor contracts and operating arrangements.

ES6. Monitoring, Reporting and SEP Updating

The SEP establishes monitoring and reporting arrangements across the project cycle so that engagement quality, grievance trends, stakeholder feedback, inclusion gaps and implementation weaknesses can be tracked and addressed. Monitoring will take place during engagement activities and after each engagement phase. The project will use indicators such as the number and coverage of consultations, number and categories of stakeholders reached, participation by women and vulnerable groups, number of site-specific stakeholder registers prepared, quality of documentation, number and status of grievances, anonymous grievances received, SEA/SH and GBV-related complaints reported through confidential channels, reprisal or retaliation-related complaints, grievances escalated to REA PMU, grievances escalated to the AfDB Independent Recourse Mechanism where applicable, timeliness of response, corrective actions completed, and frequency of disclosure and feedback outputs.

Reporting back to stakeholders is built into the SEP through periodic updates, project feedback reports, progress reports, grievance summaries, “you said / we did” summaries, media updates, stakeholder forums, and SEP or site addenda when triggered. At internal level, monthly grievance summaries will track case volume, themes, overdue actions, anonymous complaints, sensitive cases in anonymized form, escalation and trends. At broader stakeholder level, quarterly and periodic reports will cover progress, feedback received, corrective actions taken, and changes to engagement methods.

The SEP is explicitly treated as a living document. It will be reviewed at least once every year and updated when new sites are confirmed, when there are major changes in design, access routes, timing or footprint, when land-related or livelihood issues emerge, when grievance or incident trends show recurring concerns, when SEA/SH, GBV, security or retaliation risks alter consultation needs, or when implementation arrangements change through new developers, contractors or operators. Site-specific addenda will be prepared before works start at each selected location.

In conclusion, the SEP provides a stronger operational basis for transparent, inclusive, safe and responsive stakeholder engagement across the Desert to Power Project. It reflects the programme-wide nature of DtP while allowing for site-specific planning as implementation details become firm. It also places greater emphasis on accessibility, vulnerable group participation, Productive Use Equipment stakeholders, safe grievance handling, anonymous reporting, SEA/SH-sensitive procedures, reprisal risk management, documentation, reporting back to stakeholders, and compliance with AfDB OS10 and applicable Nigerian requirements.

1.0 INTRODUCTION

1.1 Project Description

The Federal Government of Nigeria (FGN) launched the Nigeria Electrification Project (NEP) in June 2018, a private-sector-driven initiative aimed at improving energy access and providing clean, reliable, and affordable electricity to rural and underserved communities across Nigeria. NEP serves as FGN's flagship off-grid energy access program, leveraging a combination of public and private funding to address the country's energy deficit. The project has secured USD 550 million in public financing—comprising USD 350 million from World Bank support and USD 200 million in African Development Bank (AfDB) loans. This funding, alongside private sector expertise and financing, is expected to connect over 3.5 million people, 705,000 households, 90,000 MSMEs, as well as 12 universities, 3 teaching hospitals, 100 COVID-19 isolation centers, and 400 primary healthcare centers. By catalyzing large-scale private sector investments, NEP has utilized grant and subsidy-based instruments to accelerate the growth of Nigeria's off-grid and mini-grid sectors.

Nigeria's commitment to achieving universal electricity access by 2030 was further emphasized with the launch of the Energy Transition Plan (ETP). Approved by the Federal Executive Council (FEC) on February 2, 2022, and unveiled by President Muhammadu Buhari at the UN Climate Change Conference (COP26), the ETP outlines a bold vision for a carbon-neutral energy system by 2060. The ETP estimates that Nigeria will require approximately USD 410 billion over the next 30 years to meet its electrification and carbon neutrality goals. However, the Nigerian power sector remains largely unprepared to meet these challenges from a planning, institutional, and funding perspective.

The Desert to Power (DtP) initiative, designed to expand upon the success of NEP, seeks to address these challenges through a series of targeted interventions. With a financing gap exceeding USD 25 billion to meet the energy needs of the country, the DtP project will focus on the development of a scalable ecosystem that involves key stakeholders—regulators, private sector actors, financial institutions, and policymakers. The DtP is a national electrification program to be implemented by REA. The project will finance multiple subprojects that are geographically dispersed. The project aims to expand energy access across various sectors, including Mini-Grids, electrification of public institutions (such as federal universities), hospitals/ healthcare centers, and the productive use of energy in agriculture and urban areas.

The DtP Project aligns with Nigeria's Nationally Determined Contribution (NDC) under the Paris Agreement, including the latest NDC 3.0, which reinforces the country's commitment to reducing greenhouse gas (GHG) emissions and advancing a low-carbon development pathway. By supporting the expansion of electricity access through renewable energy generation in remote and underserved areas, and by improving the reliability of power supply for households, MSMEs, public institutions, and essential health services, the project will contribute to reducing dependence on kerosene lighting and fossil fuel-based diesel and petrol generators. These alternative energy sources are often costly, inefficient, and associated with air pollution, GHG emissions, and other environmental and health impacts. Through the deployment of distributed renewable energy solutions, the DtP Project will support Nigeria's climate change mitigation objectives while also improving access to cleaner, more reliable, and more sustainable electricity services.

In building on the successful elements of the NEP, the DtP project will work towards scaling the off-grid and mini-grid sectors that NEP established. To date, over 52 off-grid solar companies and 61 mini-grid companies have met stringent qualification criteria to participate in the NEP mini-grid program. The expansion of these sectors under DtP will focus on delivering reliable, sustainable, and economically viable energy solutions.

The DtP Project will be implemented through different delivery arrangements depending on the project component. Component 1, which covers Interconnected Mini-Grids and related productive use energy interventions, will be implemented mainly through private developers under the applicable tender, grant, ownership, and operation arrangements. Components 2 and 3, covering Energizing Healthcare Facilities and the Energizing Education Programme for Federal Universities and associated teaching hospitals, will be implemented mainly through contractors, including EPC contractors, with defined operation and maintenance obligations as applicable. The Stakeholder Engagement Plan (SEP) applies to REA as the lead implementing agency and will be embedded in the obligations of private developers, contractors, operators, and other implementing partners through procurement documents, contract clauses, supervision arrangements, and reporting requirements

The Project Development Objective (PDO)

The objective of the project is to increase access to reliable, clean, and sustainable electricity services for households, Micro, Small, and Medium Enterprises (MSMEs), productive users, public educational institutions, healthcare facilities and associated public service delivery institutions through private-sector led and publicly supported distributed renewable energy generation solutions and related technical assistance.

1.2 Project Components

The DtP project is organized into the following core components:

Component 1: Interconnected Mini-Grid (IMG) ($120 million)

This component focuses on deploying interconnected mini-grids in regions that are either unserved or underserved by the national grid. The deployment will be done through the Minimum Subsidy Tender (MST) mechanism and Performance-Based Grants (PBG). The site selection process, currently being finalized through a geospatial survey, will evaluate over 500 sites submitted by Distribution Companies (DISCOs), based on parameters such as population density, solar insolation, and economic activity. A portion of the capital expenditure will be subsidized through a competitive bidding process, ensuring affordable tariffs for consumers. The implementation of MST and PBG will encourage private developers to own and operate the mini-grids while ensuring financial sustainability.

In addition to electricity supply, the component will support the deployment or uptake of Productive Use Equipment for households, MSMEs, agricultural users, traders, and other productive users, as applicable. This may include electricity-enabled equipment for activities such as agro-processing, cold storage, irrigation, small-scale manufacturing, commercial services, and other livelihood or enterprise-based uses. Integrating PUE into the component will help stimulate electricity demand, strengthen the financial sustainability of mini-grid operations, improve local economic outcomes, and ensure that access to electricity translates into tangible development benefits for beneficiary communities.

Subcomponent 1.1: Minimum Subsidy Tender for Mini-Grids

The MST sub-component will consolidate demand and create project portfolios for bidding. Private developers will finance, own, and operate the mini-grids, with the lowest subsidy required being the determining factor in the tender process. PUE considerations will be reflected, where applicable, in site selection, demand assessment, community engagement, and project portfolio preparation to ensure that mini-grid investments respond not only to household electricity needs but also to productive and enterprise-based energy demand.

Subcomponent 1.2: Performance-Based Grants Program

Under this sub-component, mini-grid operators will receive performance-based grants linked to CAPEX for grid-connected mini-grid projects. The grants will be rolled out based on geographic and socio-economic factors, ensuring that eligible projects have sufficient commercial loads to sustain operations in the long term. PUE uptake will be encouraged as part of the broader strategy to increase electricity demand, improve mini-grid viability, support productive livelihoods, and enhance the economic benefits of electricity access for communities and local businesses.

Component 2: Energizing Healthcare Facilities ($175 million)

This component will deploy reliable power solutions to over 65 primary healthcare centers in underserved regions. Similar to the Energizing Education Program (EEP), the component will use Engineering, Procurement, and Construction (EPC) contracts with a one-year O&M period. It aims to provide mini-grids exceeding 1 MW for these centers, covering 100% CAPEX and initial O&M costs.

Component 3: Energizing Education Programme (EEP) for Federal Universities ($375 million)

This component aims to electrify and provide clean, reliable energy to federal universities and their teaching hospitals across Nigeria. Mini-grids exceeding 1 MW will be deployed, ensuring 100% funding for CAPEX and one-year O&M. The project will also provide training and capacity building among female STEM students, as well as street lighting to reduce crime and social vices on campuses.

Component 4: Technical Assistance and Capacity Building ($30 million)

This component will provide technical assistance and capacity building to strengthen the capabilities of the Rural Electrification Agency (REA), the Project Management Unit (PMU), and related institutions involved in the implementation and scaling of the DtP Project. It will support institutional strengthening, project management, safeguards implementation, monitoring and reporting, capacity development, technical studies, knowledge management, and other activities required to ensure effective project delivery.

1.3 Resource Allocation and Project Financing

The indicative resource allocation for the project is as follows:

Table 1.1: Indicative resource allocation.

	Components/ Focus Areas	**Public Finance Provided (PFP) USD**
1.	**Interconnected Mini-Grid (IMG)** i.e. Solar Hybrid Mini-grids/ Off grid Solar in Agriculture and Solar Productive Use Equipment (PUE).	120 million
2.	**Energizing Healthcare Facilities** i.e., Captive Power	175 million

	Plant for healthcare centers	
3.	**Energizing Education Programme (EEP) for Federal Universities** i.e., Captive Power Plant for public educational institutions.	375 million
4.	**Technical Assistance and Capacity Building**	30 million
	Total	**700 million**

2.0 OBJECTIVE AND DESCRIPTION OF THE STAKEHOLDER ENGAGEMENT PLAN

The Stakeholder Engagement Plan, SEP, has been prepared to provide a clear, structured, and practical approach for stakeholder engagement throughout the life cycle of the Desert to Power Project. The SEP sets out how the Project will identify, inform, consult, and maintain communication with stakeholders in a manner that is timely, inclusive, accessible, culturally appropriate, and responsive to the nature and scale of project risks and impacts. It also establishes a channel through which stakeholders can raise concerns, submit feedback, and lodge complaints relating to project design, implementation, environmental and social performance, and the conduct of project workers, contractors, and implementing entities.

For a project of this nature, stakeholder engagement is not a one-off activity carried out only at project preparation stage. It is a continuous process that starts during project design and continues through implementation, operation, and, where relevant, decommissioning. For the DtP Project, this is especially important because the project includes different components, multiple categories of beneficiaries, private sector actors, public institutions, federal and state agencies, host communities, and potentially affected persons whose interests, expectations, and exposure to project risks may differ across locations and subprojects.

The overall purpose of this SEP is therefore to support informed participation in project decision making, strengthen transparency and accountability, improve stakeholder confidence in the project, reduce the risk of misunderstanding and conflict, and create a practical basis for resolving issues before they escalate. In doing so, the SEP also supports compliance with applicable national legislation and the African Development Bank's Environmental and Social Operational Safeguard 10 on Stakeholder Engagement and Information Disclosure under the updated Integrated Safeguards System, ISS (2023).

More specifically, the objectives of the SEP are to:

- identify all relevant stakeholders, including project affected parties, other interested parties, and disadvantaged or vulnerable groups;
- provide stakeholders with timely, clear, and understandable information on the project, its components, likely benefits, potential environmental and social risks and impacts, and proposed mitigation measures;
- establish appropriate methods for meaningful consultation with different stakeholder groups during project preparation, implementation, operation, and any future project modifications;
- promote inclusive participation, with particular attention to women, persons with disabilities, the elderly, low-income households, and other groups who may face barriers to participation or who may be disproportionately affected by project risks or excluded from project benefits;
- provide a transparent and accessible grievance mechanism through which complaints and concerns can be received, recorded, assessed, and resolved within reasonable timeframes; and
- create a basis for continuous reporting back to stakeholders on how their concerns, inputs, and recommendations have been considered in project planning and implementation.

In practical terms, this SEP is both a compliance instrument and a project management tool. It is intended not only to satisfy safeguard requirements, but also to guide day-to-day engagement practice across the various project components and locations.

2.1 Legal, Policy and Institutional Framework

This Stakeholder Engagement Plan (SEP) is prepared in line with applicable Nigerian legal, policy and institutional requirements, as well as the African Development Bank's Integrated Safeguards System (ISS), particularly Operational Safeguard 10 (OS10) on Stakeholder Engagement and Information Disclosure. The framework relevant to this SEP extends beyond public disclosure and environmental assessment. It also covers electricity sector governance, environmental and social risk management, land access, labour and working conditions, public health and safety, gender and disability inclusion, protection of vulnerable groups, climate change and renewable energy policy, data protection, public procurement, grievance management, and institutional coordination.

For the Desert to Power (DtP) Project, these requirements are important because the project will be implemented across different components, institutions, communities and geographical locations. The legal, policy and institutional framework therefore provides the basis for early disclosure, meaningful consultation, inclusive participation, grievance redress, documentation, reporting, and continuous stakeholder engagement throughout the project lifecycle.

2.1.1 Legal and Regulatory Framework

The following legal and regulatory instruments are relevant to the preparation and implementation of this SEP:

The Constitution of the Federal Republic of Nigeria, 1999, as amended, provides the overall legal foundation for governance, protection of fundamental rights, public accountability, non-discrimination, and access to justice. These principles are relevant to stakeholder engagement because the project must be implemented in a manner that respects the rights, dignity, participation and legitimate interests of affected persons, beneficiaries and other stakeholders.

The Freedom of Information Act, 2011 provides the legal basis for public access to information held by public institutions in Nigeria. For the DtP Project, the Act reinforces the obligation to disclose relevant project information in a timely and accessible manner and to respond to legitimate requests for information relating to project activities, public resources, environmental and social instruments, and decisions that may affect stakeholders.

The Environmental Impact Assessment Act, CAP E12, Laws of the Federation of Nigeria, 2004 establishes the legal requirement for environmental assessment of projects likely to have significant environmental and social effects. The Act supports public participation in the environmental assessment process and requires that environmental and social issues be considered before project approval and implementation. For the SEP, this means that consultation must begin early, continue through implementation, and allow affected persons and interested stakeholders to understand project risks, benefits and proposed mitigation measures.

The National Environmental Standards and Regulations Enforcement Agency (NESREA) Act, 2007 and applicable national environmental regulations provide the framework for environmental compliance, pollution control, waste management, environmental monitoring, and enforcement of environmental standards. These requirements are relevant to DtP subprojects involving civil works, solar hybrid systems, batteries, construction waste, e-waste, hazardous materials, noise, sanitation, and occupational or community environmental risks. Stakeholder engagement will therefore be linked to environmental and social screening, disclosure of mitigation measures, site-level environmental management, and grievance handling.

The Electricity Act, 2023 provides the current legal framework for Nigeria's electricity sector and supports the role of relevant electricity sector institutions, including the Federal Ministry of Power, the Rural Electrification Agency (REA), the Nigerian Electricity Regulatory Commission (NERC), and other sector agencies. The Act is directly relevant to the DtP Project because the project will support interconnected mini-grids, renewable energy generation, productive use of energy, and electrification of public institutions. Stakeholder engagement under the project must therefore align with electricity sector requirements relating to licensing, mini-grid development, customer protection, tariffs where applicable, safety, service quality, and coordination with relevant electricity regulators and Distribution Companies.

The Nigerian Electricity Regulatory Commission's applicable regulations, including Mini-Grid Regulations, 2026, Customer Protection Regulations, 2023, and related regulatory instruments, are relevant to Component 1, particularly the Interconnected Mini-Grid and Productive Use Equipment interventions. These instruments influence engagement with host communities, customers, productive users, private developers, DISCOs, local businesses, and other electricity consumers on service arrangements, connection requirements, complaints, tariffs, safety, and operational responsibilities.

The Nigerian Electricity Management Services Agency Act, 2015 and applicable electrical safety standards are relevant to electrical installations, inspection, testing, certification, technical safety, and the protection of users and the public from electrical hazards. For the SEP, this reinforces the need to communicate safety information clearly to communities, campuses, healthcare facilities, workers and users before and during installation and operation.

The Land Use Act, CAP L5, Laws of the Federation of Nigeria, 2004 provides the legal framework for land administration, land rights, allocation, revocation, compensation, and land use control in Nigeria. Although large-scale land acquisition is not anticipated across all components, some subprojects may require land access, use of institutional land, wayleaves, rights-of-way, or temporary occupation during construction. Stakeholder engagement must therefore include early consultation with landowners, occupiers, host institutions, local authorities and affected persons where land access or land-related impacts arise.

The Nigerian Urban and Regional Planning Act, CAP N138, Laws of the Federation of Nigeria, 2004 supports orderly physical planning, development control and disclosure of development plans. It is relevant to project activities involving siting of solar hybrid systems, mini-grid infrastructure, distribution lines, access routes, campus facilities, healthcare facilities and associated infrastructure. The SEP will support consultation on siting, layout, access, nuisance prevention, safety, and potential conflict with surrounding land uses.

The Labour Act, CAP L1, Laws of the Federation of Nigeria, 2004; Factories Act, CAP F1, Laws of the Federation of Nigeria, 2004; Employees' Compensation Act, 2010; Trade Unions Act, CAP T14, Laws of the Federation of Nigeria, 2004, as amended; and applicable occupational health and safety requirements are relevant to labour management, working conditions, worker information, worker consultation, occupational health and safety, and worker grievance arrangements. For the SEP, these instruments reinforce the need to communicate labour-related information to workers and contractors, provide safe working conditions, and maintain separate worker grievance mechanisms in line with the project's labour management arrangements.

The Public Procurement Act, 2007 is relevant because the project will involve procurement of contractors, consultants, developers, equipment suppliers, and service providers. SEP requirements, including stakeholder engagement duties, grievance management, code of conduct obligations, SEA/SH provisions, reporting obligations, community health and safety measures, and environmental and social compliance requirements, shall be reflected in procurement documents and contracts.

The Violence Against Persons (Prohibition) Act, 2015, **Child Rights Act, 2003**, and related federal and state laws on protection from violence, abuse, exploitation and discrimination are relevant to the project's management of Gender-Based Violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), child protection, and sensitive grievances. These instruments require the project to establish confidential, survivor-centred, safe and non-retaliatory channels for receiving and referring sensitive complaints.

The Discrimination Against Persons with Disabilities (Prohibition) Act, 2018 provides the legal basis for protecting the rights of persons with disabilities and promoting accessibility and inclusion. For the SEP, this requires accessible engagement venues, appropriate formats, disability-sensitive communication, reasonable accommodation, and meaningful participation of persons with disabilities in consultations and grievance processes.

The National Health Act, 2014 and applicable health sector requirements are relevant to Component 2 and health-related facilities under Component 3. Stakeholder engagement in healthcare settings must take account of patient safety, service continuity, infection prevention, emergency access, health workers, facility users, and surrounding communities.

The Nigeria Data Protection Act, 2023 is relevant because stakeholder engagement, consultation attendance records, grievance registers, beneficiary data, worker information, photographs, call records and SEA/SH-related complaints may involve the collection and processing of personal data. The project shall therefore apply data protection principles, including lawful processing, purpose limitation, confidentiality, restricted access, secure storage, and careful handling of sensitive personal information.

The project will ensure that the data protection function is covered within the REA/PMU implementation arrangement, including through a designated Data Protection Officer or suitably qualified data protection focal person, supported by the PMU safeguards team – Social safeguard specialist, GBV specialist, GRM Officer and relevant project personnel. This function will guide the secure handling of consultation records, grievance registers, photographs, beneficiary data and sensitive complaint information in line with the Nigeria Data Protection Act, 2023.

The Climate Change Act, 2021 establishes the legal framework for climate change governance in Nigeria and supports national climate action, mitigation, adaptation and low-carbon development. The DtP Project is aligned with this framework through its support for distributed renewable energy, reduced reliance on diesel and petrol generators, and improved access to cleaner electricity.

Other relevant instruments may include applicable state environmental laws, state electricity market regulations where regulatory authority has transitioned to the state level, state planning laws, public health regulations, cultural heritage laws, biodiversity conservation requirements, fire safety requirements, and local government by-laws. These will be identified and applied during site-specific screening and implementation.

2.1.2 Policy Framework

The following national policies, strategies and programmes are relevant to the SEP and DtP implementation:

The National Policy on the Environment, 2016 provides the broad policy direction for environmental protection, sustainable use of natural resources, pollution prevention, biodiversity conservation, environmental awareness, and sustainable development. The SEP supports this policy by promoting early consultation, disclosure of environmental and social risks, public awareness, and participation in environmental management.

The National Energy Policy, 2022; National Electric Power Policy, 2001; Roadmap for Power Sector Reform, August 2010; National Integrated Electricity Policy and Strategic Implementation Plan, 2025; and related electricity sector policies provide the policy basis for expanding access to reliable, affordable and sustainable electricity. These policies are relevant to the DtP Project because the project supports rural and underserved electrification, mini-grids, renewable energy deployment, productive use of electricity, and power supply to public institutions.

The National Renewable Energy and Energy Efficiency Policy, 2015 and related renewable energy strategies support increased deployment of renewable energy technologies, energy efficiency, private sector participation, and sustainable electricity access. The DtP Project contributes to these objectives through solar hybrid mini-grids, clean energy systems for healthcare and education institutions, and productive use energy interventions.

Nigeria's Energy Transition Plan, 2022 provides the national framework for achieving carbon neutrality by 2060 while expanding energy access and supporting inclusive economic development. The DtP Project supports this policy direction by promoting distributed renewable energy, reducing dependence on fossil fuel generators, and improving clean electricity access for households, MSMEs, productive users, healthcare facilities and educational institutions.

Nigeria's Nationally Determined Contribution, 2025, including the latest NDC 3.0, is relevant because the project contributes to climate change mitigation through renewable energy deployment, reduced use of fossil fuel-based self-generation, and improved access to cleaner energy services. Stakeholder engagement will communicate the project's climate and development benefits in a practical and understandable manner.

The National Gender Policy, 2021-2026 and related gender equality frameworks are relevant to the SEP because women and girls may experience different barriers to participation, access, employment, safety, decision-making and project benefits. The SEP will therefore support gender-responsive engagement, women-only consultations where appropriate, safe feedback channels, and inclusion of women's groups in site-level consultations.

National policies and standards on disability inclusion are relevant because persons with disabilities may face physical, communication, mobility, social or institutional barriers to participation. The SEP shall apply disability-inclusive engagement methods, accessible venues, suitable communication formats and reasonable accommodation during consultations and grievance handling.

National policies on labour, employment, industrial relations, child labour and occupational safety and health are relevant because the project will involve contractors, developers, consultants, workers and site labour. These policies support decent work, safe working conditions, social dialogue, prevention of child labour and effective worker grievance arrangements.

National policies on health, public health, emergency preparedness and disaster risk management are relevant to Components 2 and 3 and to construction-stage community health and safety. The SEP will support timely communication on works schedules, safety risks, emergency access, service continuity, traffic arrangements, infection prevention where relevant, and incident reporting.

National policies on public procurement, transparency and anti-corruption are relevant because project delivery will depend on transparent procurement and contract management.

Stakeholder engagement and environmental and social obligations must therefore be clearly integrated into procurement processes, bidding documents, contracts, supervision and reporting.

2.1.3 Institutional Framework

The implementation of the SEP will require coordination among several institutions whose mandates are connected with disclosure, consultation, environmental and social management, electricity sector governance, inclusion, grievance handling and project oversight.

The Rural Electrification Agency (REA) is the lead implementing agency for the DtP Project and has primary responsibility for SEP implementation at programme level. REA will coordinate stakeholder identification, programme-level disclosure, consultation planning, grievance mechanism oversight, monitoring, reporting, and integration of SEP requirements into procurement and contract management. REA will also ensure that private developers, EPC contractors, consultants, operators and implementing partners comply with applicable SEP, ESMP, GRM, SEA/SH, labour and reporting requirements.

The Federal Ministry of Power is the sector policy authority for the power sector. Its mandate is relevant to DtP because the project supports rural electrification, renewable energy access, public institution electrification, mini-grids and energy transition objectives. The Ministry will provide policy oversight and support inter-agency coordination where required.

The Nigerian Electricity Regulatory Commission is responsible for technical and economic regulation of the Nigerian electricity sector, including licensing, tariffs, standards, customer rights and obligations, mini-grid regulations and consumer protection. NERC and, where applicable, state electricity regulators will be relevant to engagement on mini-grid regulation, customer communication, service quality, tariffs, complaints and regulatory compliance under Component 1.

The Nigerian Electricity Management Services Agency is relevant for electrical safety, inspection, testing, certification and technical standards for electrical installations. Engagement with NEMSA or relevant technical safety authorities may be required for public safety communication, electrical installation compliance and safety assurance.

The Federal Ministry of Environment is the lead federal institution for environmental policy, environmental assessment, environmental protection, natural resource conservation and sustainable development. Its Environmental Assessment Department is particularly relevant to screening, environmental assessment, disclosure, review and approval of environmental and social instruments. The Ministry will also provide oversight and coordination on environmental assessment and environmental management requirements.

National Environmental Standards and Regulations Enforcement Agency (NESREA) is responsible for enforcing environmental standards, regulations, rules, laws, policies and guidelines, including environmental compliance, pollution control, waste management and environmental reporting. NESREA's mandate is relevant to subprojects involving waste, batteries, e-waste, pollution risks, sanitation, construction impacts and other environmental compliance issues. Engagement with NESREA and state environmental authorities will support compliance monitoring and complaint escalation where necessary.

State Ministries of Environment, State Environmental Protection Agencies and other state-level regulatory bodies will support site-level environmental coordination, local disclosure, compliance oversight, state permits and resolution of environmental concerns within their mandates. Their involvement will depend on the state and the nature of each subproject.

Federal and State Ministries of Lands, Offices of the Surveyor-General, land registries and relevant planning authorities are relevant where land access, land documentation, survey plans, wayleaves, rights-of-way, physical planning permits or development control approvals are required. They will support verification of land status, documentation of land access, and resolution of land-related concerns.

The Federal Ministry of Finance and relevant national planning and budgeting institutions are relevant to the financing, fiscal coordination and public resource accountability aspects of the project. Their role supports transparent project implementation, financial oversight and coordination with financing agreements.

The Bureau of Public Procurement is relevant to procurement transparency, competition, integrity, value for money and use of appropriate procurement procedures. Its mandate is important for ensuring that SEP, ESMP, GRM and other environmental and social obligations are embedded in procurement documents and contracts.

The Federal Ministry of Education, National Universities Commission (NUC), Federal universities and related education authorities are central to Component 3. They will support engagement with university management, works departments, students, staff, unions, campus businesses, security teams, host communities and other campus users. They will also support disclosure of project information, works schedules, safety notices, grievance channels and operational arrangements within beneficiary institutions.

The Federal Ministry of Health and Social Welfare, health sector agencies, teaching hospitals, primary healthcare centres and facility managers are central to Component 2 and health-related facilities under Component 3. They will support consultation with health workers, patients, facility users, nearby communities, emergency services and hospital management teams. Their role is particularly important for service continuity, patient safety, emergency access, infection prevention where relevant, and communication of construction or operational disruptions.

The Federal Ministry of Women Affairs and relevant state ministries responsible for women affairs and social development are relevant to gender inclusion, women's participation, protection of women and girls, SEA/SH risk management, and engagement with women's groups, female students, female health workers and women-led enterprises.

The National Commission for Persons with Disabilities and relevant disability organisations are relevant to disability-inclusive stakeholder engagement, accessibility of consultation venues, reasonable accommodation, inclusive communication formats, and participation of persons with disabilities in project consultations and grievance processes.

The National Human Rights Commission may provide an important referral or escalation pathway for rights-related complaints, discrimination, exclusion, intimidation, retaliation or other serious concerns that may arise during implementation. Its mandate is also relevant to public accountability and protection of vulnerable groups.

The Federal Ministry of Labour and Employment and related labour institutions are relevant to labour management, worker welfare, industrial relations, child labour prevention, occupational safety and health, and worker grievance arrangements. Their role is particularly relevant where contractors, developers and operators engage workers across project sites.

The Nigeria Data Protection Commission is relevant to the management of personal data collected through consultations, attendance registers, grievance records, beneficiary records, photographs, call centres, worker records and sensitive complaint channels. The project will apply data protection measures in the design and implementation of stakeholder engagement and grievance systems.

The National Emergency Management Agency and relevant state emergency management agencies are relevant to disaster risk management, emergency preparedness, incident response, fire safety coordination, climate-related risks and emergency communication. Their role may be required where project sites are exposed to flood, fire, storm, security or other emergency risks.

Local Government Authorities will support community entry, local disclosure, identification of affected persons, mobilisation of local stakeholders, venue arrangements, local dispute resolution, grievance referrals, and coordination with traditional and community leadership structures.

Traditional rulers, community leaders, Community Development Associations, women's groups, youth groups, faith-based organisations, civil society organisations and local NGOs are not regulatory institutions, but they are important stakeholder structures for effective SEP implementation. They will support information dissemination, inclusive consultation, feedback collection, grievance awareness and identification of vulnerable groups, while ensuring that their role does not replace direct engagement with affected persons.

The African Development Bank will review and supervise SEP implementation as part of its environmental and social due diligence and project supervision role. The project shall comply with the AfDB Integrated Safeguards System, particularly OS10 on Stakeholder Engagement and Information Disclosure, and other applicable Operational Safeguards relevant to environmental and social assessment, labour, community health and safety, land-related impacts, vulnerable groups, cultural heritage, biodiversity and pollution prevention.

2.2 African Development Bank Operational Safeguard 10 (OS 10) on Stakeholder Engagement and Information Disclosure

In addition to national legal requirements, the DtP Project is subject to the African Development Bank's updated Integrated Safeguards System, ISS, including Environmental and Social Operational Safeguard 10, OS10, on Stakeholder Engagement and Information Disclosure. The updated ISS was approved by the AfDB Board in April 2023 and became effective on 31 May 2024. OS10 recognises stakeholder engagement as a core element of good international practice and as a central part of sound environmental and social risk management.

OS10 is particularly important for the DtP Project because of the scale of the proposed investment, the variety of project components, the mix of public and private implementation arrangements, and the fact that project benefits and risks will not be uniform across locations and stakeholder groups. Under OS10, stakeholder engagement is not treated as an isolated disclosure exercise. It is framed as a continuous and inclusive process that supports stronger project design, better management of environmental and social risks, improved acceptance of the project, and more responsive project implementation.

2.2.1 Stakeholder Engagement Requirements under OS 10

OS10 requires the Borrower to identify stakeholders in a systematic manner, distinguishing between project affected parties and other interested parties. This distinction is important because the level, timing, and form of engagement should be proportionate to the interests, influence, likely exposure, and level of impact associated with each stakeholder category. Project affected parties are persons, groups, or communities who are directly or indirectly affected, or likely to be affected, by the project. Other interested parties are those who may not be directly affected but have an interest in the project because of their institutional mandate, economic interest, advocacy role, or public concern.

OS10 also requires the Borrower to identify disadvantaged and vulnerable individuals or groups who may face barriers in accessing information, participating in consultations, expressing views, or benefiting from the project. This is not a peripheral requirement; it is central to the design of an inclusive SEP. The Borrower is expected to assess the different concerns, needs, and priorities of such groups and adopt engagement methods that respond to their circumstances. In certain cases, the Bank may also require the use of independent third-party specialists to support stakeholder identification and analysis where project risks and stakeholder complexity justify this approach.

A further requirement of OS10 is that stakeholder engagement must continue throughout the project life cycle. The Borrower is expected to maintain communication with stakeholders during preparation, implementation, and operation, and to seek feedback not only on project design but also on environmental and social performance, including the implementation of environmental and social management measures. This is particularly relevant for the DtP Project, where site specific risks, contractor performance issues, community concerns, and implementation challenges may emerge at different stages and across different subprojects.

OS10 further provides that where there are significant changes to the project or where new risks and impacts arise, especially for project affected parties, the Borrower must disclose the implications of those changes and engage stakeholders on how additional risks will be addressed. This means that the SEP is a living instrument that should be updated when material project changes occur, when new stakeholder groups are identified, when site specific impacts become clearer, or when engagement experience shows that some methods are ineffective and need adjustment.

In line with OS10, the SEP itself must be proportionate to the nature, scale, and risk profile of the project. It should set out the timing and methods of engagement, define the type of information to be disclosed, explain how feedback will be obtained and used, and show how communication will be managed during project preparation and implementation. For the DtP Project, this means that the SEP must provide both a program level approach for the overall project and enough flexibility to support site specific engagement as locations, developers, contractors, and beneficiary institutions are confirmed.

2.2.2 Information Disclosure Requirement under OS 10

Information disclosure is a central pillar of OS10. The Borrower is required to disclose project information in a form and manner that allows stakeholders to understand the nature of the project, its likely risks and impacts, its expected benefits, and the opportunities available to participate in consultation and grievance processes. Disclosure should take place early enough to support meaningful consultation and should not be limited to technical documents that are inaccessible to non-specialist audiences.

In practical terms, the information to be disclosed should include:

- the purpose, nature, scale, and geographic scope of the project;
- the expected duration and sequencing of project activities;
- the likely environmental and social risks and impacts, including those that may affect vulnerable groups disproportionately;
- the measures proposed to avoid, reduce, mitigate, or manage adverse impacts;
- the potential development benefits and opportunities associated with the project;
- the proposed stakeholder engagement process, including how and when people can

participate;

- the locations and formats in which disclosed information can be accessed;
- details of planned public consultation activities; and
- the procedures through which grievances can be raised and addressed, including reference to the project grievance mechanism and the Bank's Independent Recourse Mechanism, IRM.

OS10 also makes clear that disclosure should continue during the life of the project and not stop once appraisal is completed. Information should be updated as project design evolves, as implementation progresses, and as new environmental and social issues arise. Disclosure must also be accessible. For the DtP Project, this means using local languages where necessary, non-technical summaries, culturally appropriate communication channels, and formats that take account of literacy, disability, gender, age, mobility, and geographic access constraints.

For a project such as DtP, where activities span different states, institutions, and community settings, meaningful disclosure will require more than website posting. It will require a mix of national, state, institutional, and community level channels so that project information reaches those who need it in a form they can understand and use.

2.3 Implications of the Legal, Policy, Institutional and Safeguards Framework for the DtP SEP

The legal, policy and institutional framework described above has the following practical implications for DtP SEP implementation:

- Stakeholder engagement must be undertaken early and continuously. Engagement will begin at programme level and deepen into component-level and site-specific consultation as locations, designs, developers, contractors, beneficiary institutions and implementation schedules are confirmed.
- Disclosure must be timely, accessible and understandable. Project information shall be provided in non-technical language and, where necessary, in local languages and formats suitable for low-literacy groups, persons with disabilities, women, elderly persons, students, patients, MSMEs, productive users and other affected or interested stakeholders.
- Environmental and social instruments must be linked to consultation. Screening reports, ESMPs, site-specific plans, land access documentation, grievance procedures and other relevant E&S instruments shall be disclosed and discussed with stakeholders in a manner proportionate to the risks and impacts of each component and site.
- Institutional responsibilities must be clear. REA will lead SEP implementation, but developers, contractors, operators, universities, healthcare facilities, local authorities and other implementing partners will have defined engagement, disclosure, grievance and reporting responsibilities under REA supervision.
- SEP obligations must be embedded in contracts. Procurement documents and contracts for developers, EPC contractors, consultants and operators shall include clear requirements for stakeholder engagement, community liaison, grievance reporting, code of conduct, SEA/SH prevention, non-retaliation, labour management, community health and safety, and environmental and social reporting.

- Vulnerable and disadvantaged groups must be deliberately included. The project shall identify participation barriers and apply tailored methods such as separate focus group discussions, accessible venues, local language support, female facilitators where appropriate, confidential complaint channels, disability-sensitive communication and engagement through trusted intermediaries.
- Grievance management must be accessible and safe. The project GRM shall be available to affected persons, beneficiaries, institutions, communities and other stakeholders. Sensitive complaints, including SEA/SH, retaliation, discrimination and abuse, shall be handled confidentially, safely and in a survivor-centred manner.
- Data privacy and confidentiality must be maintained. Personal information collected through engagement and grievance processes shall be stored securely, accessed only by authorised personnel, and handled in accordance with applicable data protection requirements.
- Site-specific institutional mapping must be undertaken. Because DtP subprojects will be geographically dispersed, the relevant MDAs, state agencies, local authorities, community structures and institutional focal persons shall be confirmed for each site before implementation begins.

Where national requirements and AfDB requirements differ, the project shall apply the requirement that is more stringent, more specific to the issue, or more protective of affected people, vulnerable groups and the environment

2.4 Institutional arrangement for SEP delivery

REA is the lead implementing agency for the DtP Project and shall carry primary accountability for the implementation, supervision, monitoring and reporting of this Stakeholder Engagement Plan (SEP) at programme level. However, given the multi-component and geographically dispersed nature of the project, the SEP delivery will require coordinated participation by the PMU, developers, EPC contractors, consultants, operators, beneficiary institutions, government institutions, local authorities and community structures.

Stakeholder engagement will be implemented through a tiered arrangement. At programme level, REA through the PMU will coordinate disclosure, consultation planning, grievance mechanism oversight, reporting, and interface with the AfDB and relevant federal institutions. The National Universities Commission (NUC), already identified under the institutional framework, will be treated as a relevant education sector regulatory and coordinating institution for Component 3. Its role in SEP delivery will include support to coordination with beneficiary federal universities, institutional disclosure, engagement planning, and alignment of university-level engagement with applicable education sector requirements. NUC will also be reflected under the relevant federal MDA/regulatory coordination arrangements for SEP implementation. At component and site level, private developers, EPC contractors, operators, universities, healthcare facilities and other site-level implementing entities will be responsible for carrying out day-to-day stakeholder engagement activities under REA supervision. Federal and state institutions will support access, statutory coordination, disclosure, permitting, grievance resolution and oversight where their mandates are engaged. Local Government Authorities, traditional/community leadership structures, civil society groups, women's groups, youth groups and other community-based structures will support local mobilisation, information dissemination and feedback collection without replacing direct engagement with affected persons and vulnerable groups.

For this SEP, the RACI method is used to clarify institutional roles and responsibilities.

"R" means Responsible for carrying out the activity:

"A" means Accountable for ensuring the activity is completed and meets the required standard;
"C" means Consulted before or during implementation; and

"I" means Informed of progress, outcomes or decisions.

Table 2.1: RACI Matrix for SEP Implementation

SEP Activity / Function	REA / PMU	PMU Environmental and Social Safeguard Officer / SEP Lead	GRM Officer	Developers, EPC Contractors and Operators	E&S Consultants / IVA / Third-Party Monitors	Universities, Teaching Hospitals, PHCs and Facility Managers	Federal / State MDAs and Regulators	LGAs, Traditional / Community Structures, CSOs and Vulnerable Group Representatives	AfDB
Overall SEP implementation and compliance oversight	A	R	C	R	C	C	C	I	C/I
Preparation and updating of programme-level SEP	A	R	C	C	C	C	C	C	C
Preparation of site-specific stakeholder registers and engagement plans	A	R	C	R	C	C	C	C	I
Identification and mapping of project-affected parties, other interested parties and vulnerable groups	A	R	C	R	C	C	C	C/R	I
Programme-level disclosure of SEP and other E&S instruments	A	R	C	I	C	C	C	I	C/I

SEP Activity / Function	REA / PMU	PMU Environmental and Social Safeguard Officer / SEP Lead	GRM Officer	Developers, EPC Contractors and Operators	E&S Consultants / IVA / Third-Party Monitors	Universities, Teaching Hospitals, PHCs and Facility Managers	Federal / State MDAs and Regulators	LGAs, Traditional / Community Structures, CSOs and Vulnerable Group Representatives	AfDB
Site-level disclosure of project information, ESMPs, works schedule, safety notices and GRM channels	A	C	C	R	C	R	C	C/R	I
Planning and delivery of public consultations, focus group discussions and stakeholder meetings	A	R	C	R	C	R	C	C/R	I
Engagement with disadvantaged and vulnerable groups	A	R	C	R	C	C	C	C/R	I
Community entry, local mobilisation and meeting logistics	A	C	I	R	I	R	C	R	I
Integration of SEP requirements into procurement documents and	A/R	C	C	I	C	I	C	I	C/I

SEP Activity / Function	REA / PMU	PMU Environmental and Social Safeguard Officer / SEP Lead	GRM Officer	Developers, EPC Contractors and Operators	E&S Consultants / IVA / Third-Party Monitors	Universities, Teaching Hospitals, PHCs and Facility Managers	Federal / State MDAs and Regulators	LGAs, Traditional / Community Structures, CSOs and Vulnerable Group Representatives	AfDB
contracts									
Contractor, developer and operator compliance with SEP requirements	A	C/R	C	R	C	C	C	I	I
Operation of the project-level Grievance Redress Mechanism	A	C	R	R/C	C	C/R	C	C/R	I
Receipt, logging, tracking and reporting of grievances	A	C	R	R/C	C	C/R	I	C/R	I
Resolution of site-level grievances	A	C	R	R	C	R/C	C	C/R	I
Escalation of complex or unresolved grievances	A	R	R	C	C	C	C/R	C	I
SEA/SH and other sensitive grievance	A	R	R	C/R	C	C	C	C	I

SEP Activity / Function	REA / PMU	PMU Environmental and Social Safeguard Officer / SEP Lead	GRM Officer	Developers, EPC Contractors and Operators	E&S Consultants / IVA / Third-Party Monitors	Universities, Teaching Hospitals, PHCs and Facility Managers	Federal / State MDAs and Regulators	LGAs, Traditional / Community Structures, CSOs and Vulnerable Group Representatives	AfDB
referral and confidentiality management									
Reporting back to stakeholders on issues raised and actions taken	A	R	C	R	C	R	I	C/R	I
Monitoring of SEP implementation and stakeholder engagement performance	A	R	C	C/R	R/C	C	C	C	I
Monthly and quarterly SEP/GRM reporting	A	R	R	R	C	C	I	I	C/I
Independent audit, verification or third-party compliance review where required	A	C	C	C	R	C	C	I	C/I

SEP Activity / Function	REA / PMU	PMU Environmental and Social Safeguard Officer / SEP Lead	GRM Officer	Developers, EPC Contractors and Operators	E&S Consultants / IVA / Third-Party Monitors	Universities, Teaching Hospitals, PHCs and Facility Managers	Federal / State MDAs and Regulators	LGAs, Traditional / Community Structures, CSOs and Vulnerable Group Representatives	AfDB
Capacity building on stakeholder engagement, GRM, inclusion and SEA/SH response	A	R	C	R/C	C/R	C/R	C	C	I
Interface with AfDB on SEP implementation, corrective actions and disclosure requirements	A/R	R	C	C	C	I	C	I	C

The institutional roles under this arrangement are further described below:

- **REA / PMU** shall remain accountable for the overall implementation of the SEP. The PMU will ensure that stakeholder engagement is planned, funded, implemented, monitored and reported in accordance with AfDB requirements, Nigerian legal and policy requirements, and the commitments set out in this SEP. REA will also ensure that SEP obligations are included in procurement documents, contracts, grant agreements, developer obligations, contractor requirements and operational arrangements.
- **The PMU Environmental and Social Safeguard Officer / SEP Lead** shall be responsible for day-to-day coordination of SEP implementation. This will include stakeholder mapping, consultation planning, disclosure coordination, engagement with vulnerable groups, supervision of contractor and developer stakeholder engagement activities, preparation of SEP reports, and coordination of updates to the SEP and site-specific engagement plans.
- **The GRM Officer** shall be responsible for the operational management of the project grievance mechanism including GBV cases. This includes receiving, logging, acknowledging, tracking, escalating and reporting grievances. The GRM Officer will work closely with the Social Safeguard Officer(s), site focal persons, developers, contractors, operators and beneficiary institutions to ensure that grievances are handled in a timely, accessible, confidential and non-retaliatory manner.
- **Private developers, EPC contractors and operators** shall be responsible for implementing site-level stakeholder engagement activities within their scope of work. Their responsibilities will include community entry support, site-level disclosure, communication of works schedules, safety notices, engagement with affected persons, reporting of stakeholder concerns, receiving and referring grievances, maintaining local liaison arrangements, and implementing relevant ESMP and SEP requirements under REA supervision.
- **E&S consultants, Independent Verification Agents and third-party monitors** shall provide technical support, capacity building, compliance review, monitoring, audits, documentation and independent verification where required. They may also support preparation of site-specific instruments, training, stakeholder mapping, review of engagement records and assessment of SEP implementation performance.
- **Universities, teaching hospitals, primary healthcare centres and facility managers** shall support site-level engagement within beneficiary institutions. Their role will include facilitating access, identifying relevant internal stakeholders, notifying staff, students, patients, facility users and service providers, supporting consultations, displaying project information, communicating works schedules and safety arrangements, and assisting with grievance referral and issue resolution within their institutions.
- **Federal and state MDAs and regulators**, including relevant environmental, power, health, education, lands, planning, gender, disability, labour and emergency management institutions, shall be consulted and involved where their statutory mandates are relevant. Their roles may include permitting, technical review, environmental and social oversight, sector coordination, support to disclosure, grievance escalation, protection of vulnerable groups, and monitoring of compliance with applicable legal and regulatory requirements.
- **Local Government Authorities, traditional and community leadership structures, Community Development Associations, civil society organisations, women's groups, youth groups, disability organisations and other local structures** shall

support local mobilisation, information dissemination, identification of vulnerable groups, feedback collection and community-level issue resolution. Their involvement shall complement, but not replace, direct consultation with affected persons, women, youth, persons with disabilities, low-income households and other disadvantaged or vulnerable stakeholders.

- **The AfDB** shall review, advise and supervise SEP implementation as part of its environmental and social due diligence and project supervision role. AfDB will be consulted or informed, as applicable, on SEP updates, disclosure requirements, major stakeholder concerns, serious grievances, incident trends, corrective actions and implementation progress.

This institutional arrangement will be reviewed and updated as project implementation advances, particularly when site locations are confirmed, developers and contractors are appointed, beneficiary institutions are finalised, or new stakeholder groups and implementation risks are identified.

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology

The methodology for stakeholder identification and analysis follows the highest standards of international best practice in stakeholder engagement, as outlined by the African Development Bank's (AfDB) Operational Safeguard 10 (OS10). The approach is designed to ensure that all stakeholders are properly identified, engaged, and consulted in a manner that is both transparent and inclusive throughout the entire project cycle. Key principles to guide this process include:

1. **Openness and Life-Cycle Approach**: The project will engage stakeholders through the entire project life cycle, ensuring that consultations are conducted in an open, transparent, and inclusive manner. This approach will be free of any external manipulation, coercion, or intimidation. Public consultations will be scheduled at critical phases of the project, beginning with the design phase, continuing through implementation, and throughout operational phases. Stakeholder engagement will be carried out at multiple levels of intensity, according to the specific stages of the project.
2. **Informed Participation and Feedback:** Information will be actively shared with all stakeholders, ensuring that they are well-informed about the project, its potential impacts, benefits, and mitigation measures. Information will be provided in formats that are appropriate to the audience and will be accessible to all stakeholders. A robust mechanism will be implemented for stakeholders to provide feedback, raise concerns, and submit suggestions or complaints. The project team will analyze this feedback and, where appropriate, adjust plans and strategies in response.
3. **Inclusiveness and Sensitivity**: Inclusivity is a fundamental principle of the stakeholder engagement process. All stakeholders will be encouraged to participate, with particular attention given to vulnerable and marginalized groups. Vulnerability may stem from factors such as socio-economic status, gender, age, disability, or cultural background. Engagement methods will be adapted to reflect the needs, preferences, and sensitivities of diverse groups. This includes providing information in local languages, facilitating accessible communication methods, and accommodating cultural practices in consultation processes. Special efforts will be made to ensure that women, youth, persons with disabilities, minority groups, and other disadvantaged populations are meaningfully involved in the consultation process.
4. **Flexibility and Adaptability**: Stakeholder engagement will be flexible, responsive to changes, and adapted as needed to fit the local context and project dynamics. If certain engagement methods are not feasible due to factors such as social distancing, gender dynamics, high-risk of retaliation, or local governance constraints, alternative forms of engagement (e.g., online meetings, phone consultations, radio broadcasts, and community mobile apps) will be utilized. The project will ensure that engagement methods align with cultural norms and the unique needs of the affected communities, ensuring inclusivity in the process.

Methods used for stakeholder identification include:

- Review of the project concept, component design, likely implementation routes, and possible environmental and social interactions.
- Review of the parent NEP engagement experience and the consultations already held

during DtP preparation.

- Screening of institutions and groups that have decision making power, implementation roles, oversight duties, or a direct stake in outcomes.
- Consideration of parties that may be affected differently because of location, livelihood, age, gender, disability, social position, literacy, security context, or access to information.
- Planned site level validation once exact locations, footprints, and implementation schedules are confirmed.

Stakeholder identification for Desert to Power has been carried out in three layers: project affected parties; other interested parties; and disadvantaged or vulnerable groups. Because site decisions are still being finalized for several components, the present analysis is a program level stakeholder map. Each selected site will be screened again before works start so that site level stakeholders, access barriers, local leadership structures, and communication channels are properly recorded.

REA will maintain a living Stakeholder Register (using the template provided in Annex 2) covering the identified groups (i) project-affected parties, (ii) other interested parties, and (iii) disadvantaged/vulnerable groups. The register will include - location, stakeholder category, key concerns, preferred language and communication channels, accessibility barriers, and agreed engagement frequency.

For DtP, stakeholder identification will be undertaken at two levels:

- **Program level**: federal/state agencies; regulators; DISCOs; private developers and EPC contractors; financial institutions; civil society; media; universities and health sector institutions; consumer/business associations.
- **Subproject level (once sites are selected)**: host communities; landowners/occupiers; nearby businesses; community leadership structures; women's groups; youth groups; persons with disabilities; internally displaced persons (where present); smallholder farmers; farmer cooperatives and associations; agro-processors; irrigation users; cold-chain and storage operators; agricultural traders and other productive use energy users; security and emergency services; local government; neighbouring infrastructure operators.

3.2 Stakeholder categories

Table 3.1: Stakeholder groups

Stakeholder group	Likely interest in the project	Likely level of influence	Main engagement need
REA and PMU	Program delivery, procurement, safeguards, reporting, grievance management	High	Frequent coordination, decision support, performance tracking
AfDB and financing partners	Safeguard compliance, implementation progress, disclosure, accountability	High	Structured reporting, issue escalation, disclosure records, field visit coordination, monitoring feedback, and follow-up on agreed corrective actions

Stakeholder group	Likely interest in the project	Likely level of influence	Main engagement need
Federal MDAs, Regulators and oversight institutions	Sector planning, approvals, safeguards, public accountability	High	Formal briefings, technical review, disclosure, field follow up
State and local authorities	Local access, coordination, dispute handling, local acceptance	Medium to high	Early notice, regular consultation, joint problem solving
DISCOs and private developers	Site viability, service arrangements, technical design, customer interface	High	Commercial and technical engagement, community interface duties
Universities, teaching hospitals and PHCs	Beneficiary institutions, service reliability, site access, user management	High for their sites	Structured consultation, design inputs, operation phase communication
Host communities and nearby residents	Construction impacts, access, jobs, safety, benefits, SEA/SH and GBV risks, community health and safety, grievance channels	High for local acceptance	Plain language disclosure, repeated meetings, feedback loops
MSMEs, traders and productive users	Service quality, reliability, cost, business opportunities	Medium	Targeted outreach on service arrangements and opportunities
Women, youth, elderly people, persons with disabilities, minorities and displaced persons where present	Access barriers, safety, exclusion risk, differentiated impacts	Variable	Tailored meetings, safe channels, focused follow up
CSOs, faith-based groups, consumer groups and academia	Public interest, social accountability, sector learning	Medium	Disclosure, consultations, access to public information
Media	Public information, milestones, reputation, accountability	Medium	Timed briefings and factual updates
Workers, contractors and consultants	Working conditions, OHS, worker grievance, community interface duties	Medium	Induction, code of conduct, worker GRM, regular toolbox engagement

3.3 Disadvantaged/ Vulnerable individuals or groups.

Projects such as Desert to Power could inadvertently exclude people even where project benefits are positive in the long run. REA will identify groups at risk of exclusion from engagement or disproportionate impacts, and will apply differentiated methods (e.g., separate focus groups, accessible venues/times, mobility assistance, interpreters, and trusted intermediaries). The risk is usually not that the group is ignored based on formal documentation. The real risk is that the method of engagement does not fit the group’s practical realities and unique requirements. The project will therefore treat vulnerable group inclusion as a dedicated line of work during planning and implementation. Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following as shown in table 3.2

below.

Table 3.2: Vulnerable groups

Group	Possible participation barrier or heightened risk	Tailored engagement approach
Women and girls	Time burden, unequal speaking space, safety concerns, SEA/SH and GBV risks, male dominated meeting settings	Separate focus groups where useful, mixed and women only options, female facilitators, timing that fits care responsibilities, confidential complaint channels
Youth	Low trust in formal meetings, limited direct access to decision makers	Youth roundtables, digital outreach, focused sessions on jobs, skills and service use
Elderly persons	Mobility limits, hearing issues, lower access to digital channels	Small group sessions, assisted mobility where needed, shorter meetings, verbal explanations
Persons with disabilities	Venue barriers, communication barriers, exclusion from general meetings	Accessible venues, front row seating, sign or interpretation support where required, direct outreach through disability organizations
Minority groups and non-dominant language speakers	Language barrier, lower confidence in public meetings	Translation or interpretation, local facilitators, smaller group meetings
Internally displaced persons or highly mobile populations where present	Weak local representation, documentation issues, service access concerns	Targeted outreach through local leadership and humanitarian interfaces where relevant
Low literacy households	Written notices alone may not work	Oral briefings, radio, pictorial materials, community noticeboards and field outreach

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate.

The project will further identify additional vulnerable groups that may emerge in the course of implementation. This could include displaced persons, migrant workers, and those living in remote or isolated locations who face unique access barriers. Engagement methods for these groups will be designed to be accessible, culturally appropriate, and sensitive to their needs.

The methods of engagement for these groups will vary based on the nature of the vulnerability, the local context, and availability of resources to ensure meaningful participation. The engagement processes will be implemented in collaboration with local organizations representing vulnerable groups, ensuring that consultation is conducted in a manner that is respectful of their rights and needs.

Reprisal risk: REA will screen for reprisal and retaliation risks, including threats for speaking up, political coercion, intimidation, discrimination or social pressure linked to participation in consultations or grievance reporting. This screening will be undertaken as part of site-specific stakeholder mapping, ESIA/ESMP fieldwork, baseline social risk assessment, consultations with vulnerable groups, and GRM planning. The ToRs for ESA instruments shall require consultants to assess reprisal, retaliation and intimidation risks and to propose appropriate safe engagement measures. Where such risks are identified, REA will apply confidential feedback channels, neutral consultation venues, careful handling of stakeholder identities, restricted disclosure of sensitive information, and other measures necessary to protect participants from harm.

3.4 Additional stakeholder mapping actions

To strengthen the effectiveness and contextual relevance of stakeholder engagement across project sites, additional stakeholder mapping will be undertaken as project locations, designs, implementation arrangements, contractors, developers, operators and beneficiary institutions are confirmed. These actions will build on the programme-level stakeholder mapping already undertaken in this SEP and will ensure that site-specific stakeholders, participation barriers, local communication channels, and potential risks are properly identified before site-level engagement and physical works commence. The ESIA/ESMP field exercises will provide an important opportunity to validate the stakeholder mapping, collect site-specific information, confirm vulnerable groups and participation barriers, and identify practical actions required for inclusive engagement and grievance management.

The additional stakeholder mapping actions shall include the following:

- Prepare a site-specific stakeholder register for every selected mini-grid, Productive Use Equipment intervention area, university, teaching hospital, healthcare facility and other relevant project site (register template in Annex 2).
- Identify and document project-affected parties, other interested parties, disadvantaged and vulnerable groups, productive users, smallholder farmers, landowners/occupiers, nearby businesses, local institutions, service users, and other stakeholders relevant to each site.
- Confirm local languages, literacy levels, preferred communication channels, accessibility needs, and community entry protocols before site-level disclosure and consultation activities commence.
- Identify local leadership structures, women's groups, youth groups, disability organizations, farmer groups, community-based organizations, faith-based groups, civil society organizations, and other trusted intermediaries that may support inclusive engagement.
- Record contact persons, institutional focal points, vulnerable group focal points, grievance focal persons, and preferred feedback channels in the living Stakeholder Register.
- Screen for local security, SEA/SH, GBV, retaliation and reprisal risks so that consultations and grievance channels are designed and implemented safely.
- Update the Stakeholder Register periodically during implementation to reflect new stakeholders, changes in project design, emerging risks, grievance trends, lessons from engagement, and changes in local conditions.
- Ensure that the outcomes of site-specific stakeholder mapping inform consultation planning, disclosure methods, vulnerable group engagement, grievance management, contractor/developer obligations, and monitoring/reporting arrangements.

4.0 STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Summary of stakeholder engagement done during project preparation

Effective stakeholder engagement during the preparation phase is crucial for the success of the Desert to Power (DtP) project, as it establishes the foundation for ongoing and meaningful participation throughout the project cycle. During the preparation phase, various consultations and engagement meetings were held to align the project with stakeholder expectations, identify key issues, and integrate lessons learned from the Nigeria Electrification Project (NEP).

The preparatory engagements recorded in this SEP were primarily undertaken at programme and institutional levels, involving REA, AfDB, relevant government institutions, beneficiary institutions, development partners and project delivery actors. This approach reflects the current stage of project preparation, where several site-specific locations, designs and implementation arrangements are still being finalized. Consequently, further programme and Institutional level, community-level and site-specific consultations will be undertaken as project locations are confirmed and before any site-level activities, contractor mobilization or physical works commence. These subsequent consultations will be used to validate local stakeholder groups, identify affected persons and vulnerable groups, disclose site-specific risks and mitigation measures, confirm preferred communication channels, and establish accessible grievance uptake points at each project location.

The following table summarizes the key public consultations conducted during the project preparation phase:

Table 4.1: Summary of Stakeholder Engagement

Consultation	Meeting Dates	Participants	Meeting Themes	Venue	Main value for the SEP
Discussion with AfDB representatives (Nigeria Office) on status of NEP, challenges, lessons learned, and readiness for DtP	November 2024	REA-NEP PMU, AfDB Nigeria Office	Engagement on NEP's lessons and DtP readiness	NEP Board Room (Physical), Abuja	Confirmed the need to carry parent project lessons into the new design
Discussions with stakeholders to firm up designs for various interventions to scale up NEP elements for DtP	July 2025 – March 2026	Federal Universities, REA-NEP, AfDB	Building on NEP lessons for DtP	Supervision Mission (Physical), across various states	Helped shape the education component and institutional expectations
E&S identification mission and site reconnaissance visits to selected proposed beneficiary institutions under the Energizing Education Programme	23–25 July 2025 3–9 August 2025	REA-NEP, AfDB E&S Officer, EEP Desk Officer, Vice Chancellors/ Acting Vice Chancellors and senior management staff of Alvan Ikoku Federal University of Education, University of Jos, and Adeyemi Federal University of Education	Project introduction; institutional readiness; land availability and ownership; existing land use and farming activities; preliminary environmental and social due diligence; security considerations; site reconnaissance; and follow-up documentation requirements	Imo, Plateau and Ondo States	Supported early identification of land ownership status, existing land use, staff farming activities, possible community land access, site suitability considerations, security risks and further site-specific due diligence needs. The engagements also reinforced the need for continued site-specific consultation, documentation of land allocation, and avoidance of socially encumbered land where feasible
Brainstorming session with AfDB-NEP PMU and AfDB-NEP Task Team	September 2025	REA-NEP PMU, AfDB-NEP Task Team	Refining the scope of NEP components for DtP	Virtual Meeting (Zoom)	Supported the revised component structure
Discussion with World Bank DARES PMU on alignment of the DARES	September 2025	REA-NEP PMU, AfDB-NEP Task Team	Aligning DARES concept with DtP	Hybrid (Physical & Virtual) at NEP	Provided useful implementation lessons for related energy

Consultation	Meeting Dates	Participants	Meeting Themes	Venue	Main value for the SEP
project with DtP				Office, Abuja	access programmes and reinforced the need to ensure that DtP stakeholder engagement, disclosure and grievance arrangements remain aligned with AfDB ISS requirements and are not copied from other financier systems
Engagement with development partners on E&S instrument for DtP project preparation	October 2025	REA-NEP PMU, AfDB-NEP Task Team	Development of E&S instruments for DtP	Virtual Meeting (Zoom)	Supported preparation scheduling for safeguard instruments
ESIA-related consultations and community engagement for proposed DtP sites	April – May 2026	University representatives, host community representatives, Federal Ministry of Environment representatives, State Ministry of Environment representatives, REA/PMU representatives, and other relevant site-level stakeholders	Development of ESIA documentation; land identification; environmental and social screening; scoping of potential impacts; identification of stakeholder concerns; and discussion of preliminary mitigation and engagement requirements	Respective states, proposed project sites, and beneficiary universities	Provided site-level information to support ESIA preparation, stakeholder identification, land and siting considerations, screening and scoping of environmental and social risks, and early understanding of community concerns. The consultations also helped identify the need for continued site-specific engagement, disclosure of E&S instruments, grievance access, and documentation of affected and interested stakeholder groups before implementation
University-level pre-feasibility study visits, site reconnaissance and	January – May 2026	REA PMU, university Vice Chancellors or	Initial project engagement;	Proposed DtP beneficiary	Supported early understanding of institutional readiness, land

Consultation	Meeting Dates	Participants	Meeting Themes	Venue	Main value for the SEP
stakeholder consultations for proposed DtP beneficiary institutions		representatives, Directors of Works, Directors of Physical Planning, university management teams, academic and non-academic staff, students, community leadership and other relevant institutional stakeholders	assessment of institutional willingness and readiness; identification of land options; review of land ownership and documentation; observation of existing land use, farming activities, economic trees, drainage, access and security considerations; identification of applicable E&S instruments; ESMP/ESIA-related consultations; construction risk discussions; SEA/SH and child protection concerns; sustainability; local employment expectations; and grievance channels	universities across Niger, Kano, Jigawa, Benue, Delta, Bayelsa, Rivers, Akwa Ibom, Oyo, Ogun, Ekiti, Osun, Kaduna, Kebbi, Adamawa and Bauchi States	availability, land-use conditions, possible encumbrances, farming and livelihood issues, site suitability, applicable E&S instruments, construction-related risks, SEA/SH-sensitive concerns, grievance access and follow-up actions required before implementation. The findings will inform site-specific screening, ESIA/ESMP preparation, RAP/LRP requirements where applicable, contractor obligations, project sequencing and continued stakeholder engagement.

Feedback and stakeholder comments gathered during these consultations have been incorporated into the Stakeholder Engagement Plan (SEP). These consultations emphasized the importance of continuing public information disclosure and transparent stakeholder engagement throughout the project cycle. Further, the discussions helped to tailor the engagement strategies based on the key concerns and needs of the stakeholders involved.

Details of the stakeholder engagements, site reconnaissance visits, prefeasibility study and stakeholder engagements undertaken during project preparation are provided in Annex 6. Further details of the university-level pre-feasibility study visits, site reconnaissance activities and stakeholder consultations undertaken during project preparation between January and May 2026 are provided in Annex 7. The annex summarises the institutions visited, stakeholder groups engaged, land options reviewed, preliminary E&S observations, key concerns raised, applicable E&S instruments, follow-up actions.

The next round of engagement shall move from concept level consultation to location specific engagement. For the education and healthcare components, consultation at each beneficiary institution shall cover siting, construction timing, safety, user access, grievance channels, and post installation operation arrangements. For the mini grid component, each selected site shall have community level disclosure and consultation before final design and before mobilization.

Engagement will be conducted through a tiered approach:

- Tier A – Program engagement: national and state-level consultations on design parameters, implementation arrangements, environmental and social instruments, and GRM access; periodic reporting on progress and program-level performance.
- Tier B – Subproject engagement: site-specific consultations before finalizing designs and before construction starts; ongoing construction-stage engagement (safety notices, traffic, labor influx); operational engagement (service quality, tariffs where relevant, O&M impacts); closure engagement where applicable.

REA will implement a feedback loop by documenting issues raised and publishing a quarterly "you said / we did" summary during active implementation, indicating how stakeholder input was integrated or why it could not be adopted. At programme level, a consolidated feedback summary will be prepared at least annually, or more frequently where significant stakeholder issues, recurring grievances or material project changes arise.

Engagement methods will be selected to match stakeholder needs and participation barriers and may include: public meetings, focus groups, key informant interviews, household outreach (where needed), radio announcements, disclosure boards, and digital channels where access allows. Methods will be adapted if security, disease control measures, or reprisal risks affect face-to-face engagement.

4.2 Summary of project stakeholder needs and methods, Key Environmental and Social Issues, and Methods for Stakeholder Engagement

To foster inclusive and meaningful participation, the DtP Project will adopt stakeholder engagement methods that are proportionate to the nature of each stakeholder group, their level of influence or exposure, their information needs, and the environmental and social risks or impacts that may affect them. In line with AfDB OS10, consultations will be timely, accessible, culturally appropriate, inclusive, free of manipulation, intimidation, coercion, discrimination and reprisal, and designed to support informed participation throughout the project lifecycle.

The engagement approach will not be limited to only general information dissemination. It will also focus on the specific environmental and social issues that are most relevant to each stakeholder category, including land access, construction impacts, community health and safety, occupational health and safety, SEA/SH and GBV risks, service reliability, affordability, inclusion of vulnerable groups, access to grievance channels, labour issues, environmental management, and site-specific mitigation measures.

Table 4.2 below summarises the key stakeholder needs, central environmental and social issues, and appropriate engagement methods for the DtP Project.

Table 4.2: Stakeholder Needs, Key E&S Issues and Engagement Methods

Stakeholder category	Key environmental and social issues, risks and impacts central to the stakeholder group	Main information and engagement needs	Appropriate engagement methods and tools
REA and PMU	Overall E&S risk management; compliance with AfDB ISS and national requirements; implementation of SEP, ESMP, GRM and SEA/SH measures; contractor/developer supervision; disclosure and reporting obligations	Timely information for decision-making, safeguards coordination, monitoring, issue escalation, reporting and corrective action tracking	Internal coordination meetings, technical workshops, progress reviews, safeguards reporting, management briefings, field monitoring, documentation review
AfDB and financing partners	Compliance with AfDB ISS requirements; adequacy of stakeholder engagement; implementation progress; grievance trends; E&S performance; corrective actions; disclosure records; field monitoring outcomes	Structured reporting, access to engagement records, evidence of consultations, field visit coordination, monitoring updates and notification of significant E&S issues	Formal correspondence, supervision missions, field visits, implementation support meetings, progress reports, disclosure records, E&S monitoring reports
Federal MDAs, regulators and oversight institutions	Environmental assessment approvals; electricity sector regulation; land and planning requirements; public health and safety; labour compliance; gender, disability and social inclusion; data protection and public accountability	Technical information on project design, permits, safeguards instruments, stakeholder engagement outcomes, site-level issues and compliance requirements	Formal meetings, technical review sessions, written submissions, disclosure of E&S instruments, inter-agency coordination meetings, field follow-up
State and local authorities	Local access and coordination; land-related issues; community acceptance; local environmental concerns; conflict prevention; public safety; grievance resolution and escalation	Early notification of project activities, local stakeholder mapping, consultation schedules, local grievance arrangements and site-specific E&S measures	Courtesy visits, coordination meetings, community entry meetings, local disclosure, joint site visits, grievance referral meetings
DISCOs and private developers	Site viability; interconnection arrangements; customer interface; community	Clear roles in community engagement, customer	Technical meetings, commercial and community interface

Stakeholder category	Key environmental and social issues, risks and impacts central to the stakeholder group	Main information and engagement needs	Appropriate engagement methods and tools
	acceptance; tariff and service communication; land access; construction impacts; operational sustainability; PUE demand stimulation	communication, site-level disclosure, grievance uptake, service arrangements and E&S compliance obligations	meetings, customer sensitisation, site visits, disclosure boards, helpdesks, developer-led consultations under REA supervision
EPC contractors, operators and consultants	Contractor ESMP implementation; occupational health and safety; labour management; worker behaviour; code of conduct; SEA/SH prevention; community health and safety; waste, traffic, noise and access management	Clear contractual E&S obligations, site-level stakeholder engagement duties, grievance referral procedures, safety communication and reporting requirements	Contractor induction, toolbox talks, code of conduct training, community liaison meetings, site notices, OHS briefings, monthly E&S reporting
Universities, teaching hospitals, PHCs and facility managers	Site access; construction timing; service continuity; patient, student and staff safety; emergency access; traffic and movement control; electricity reliability; operation and maintenance arrangements	Information on project scope, siting, works schedule, safety measures, access restrictions, grievance channels and operational responsibilities	Management meetings, campus/facility consultations, notices, staff/student briefings, patient/user communication, helpdesks, information boards
Host communities and nearby residents	Construction impacts; noise, dust and waste; movement restrictions; land access; community health and safety; traffic risks; employment expectations; benefit-sharing concerns; SEA/SH and GBV risks; grievance access	Plain-language information on project benefits, risks, mitigation measures, works schedule, safety precautions, job communication, grievance channels and feedback processes	Public meetings, community entry meetings, focus group discussions, local language briefings, radio announcements, site notices, information boards, household outreach where needed
Landowners, occupiers and land users	Land access; temporary or permanent land use; wayleaves; disturbance to crops, structures, livelihoods or access routes; compensation or livelihood restoration concerns where applicable	Early and transparent information on land requirements, access arrangements, eligibility, documentation, mitigation measures and grievance channels	One-on-one meetings, site walks, land verification meetings, consultation with local authorities, written notices, grievance intake points
MSMEs, traders and productive	Service quality and reliability; affordability; connection	Practical information on electricity service	Targeted outreach sessions, business

Stakeholder category	Key environmental and social issues, risks and impacts central to the stakeholder group	Main information and engagement needs	Appropriate engagement methods and tools
users	requirements; access to Productive Use Equipment; business continuity during works; opportunities for improved productivity; grievance channels	arrangements, PUE opportunities, eligibility, costs, safety, business disruptions and complaint mechanisms	association meetings, market meetings, flyers, radio messages, customer helpdesks, surveys/interviews
Smallholder farmers, farmer cooperatives, agro-processors and irrigation users	Access to PUE; electricity for irrigation, cold storage, processing and other productive activities; affordability; land or access disruption; livelihood benefits; equipment use and maintenance; safety risks	Information on PUE options, eligibility, productive use opportunities, demand assessment, affordability, safety, grievance channels and livelihood-related impacts	Farmer group meetings, cooperative meetings, agricultural extension-style sessions, demonstrations, focus group discussions, local language outreach, surveys
Women and girls	Exclusion from decision-making; time burden; limited access to project information; safety concerns; SEA/SH and GBV risks; unequal access to jobs, training, electricity benefits or PUE opportunities	Safe and inclusive consultation spaces, information on project benefits and risks, confidential complaint channels, women's participation in decision-making and targeted livelihood opportunities	Women-only focus groups where appropriate, female facilitators, engagement through women's groups, safe reporting channels, local language briefings, GBV/SEA/SH sensitisation
Youth	Employment expectations; skills and training opportunities; digital engagement needs; road and traffic safety; risk of exclusion from formal consultations; potential exposure to antisocial behaviour around construction areas	Clear information on jobs, skills, conduct requirements, safety, grievance channels and project timelines	Youth roundtables, digital communication, school/campus engagements, community youth meetings, social media where appropriate, safety awareness sessions
Elderly persons	Mobility limitations; lower access to digital information; safety risks during construction; difficulty attending long meetings; possible exclusion from decision-making	Accessible, short and clear information on project activities, safety risks, access changes and grievance channels	Small group meetings, assisted attendance where needed, home-based outreach where appropriate, oral briefings, local leadership support
Persons with disabilities	Physical, communication and social barriers to participation; inaccessible venues;	Accessible consultation venues, appropriate	Accessible meetings, disability organisation engagement, sign or

Stakeholder category	Key environmental and social issues, risks and impacts central to the stakeholder group	Main information and engagement needs	Appropriate engagement methods and tools
	exclusion from project benefits; safety risks; limited access to grievance channels	communication formats, reasonable accommodation, direct engagement and safe grievance access	interpretation support where required, front-row seating, adapted materials, direct outreach
Minority groups, non-dominant language speakers and low-literacy households	Language barriers; limited access to written information; lower confidence in public meetings; risk of exclusion from consultation and benefits	Local language communication, oral explanations, pictorial materials, trusted intermediaries and simplified disclosure	Local language meetings, radio announcements, pictorial leaflets, community noticeboards, small group discussions, oral briefings
Internally displaced persons, migrant groups or highly mobile populations where present	Weak local representation; limited documentation; access to services; exclusion from benefits or grievance mechanisms; protection risks	Targeted outreach, information on access to services, grievance channels, safety and inclusion measures	Engagement through local authorities, humanitarian or community interfaces where relevant, mobile outreach, small group meetings, confidential feedback channels
Workers	Occupational health and safety; working conditions; worker grievance mechanism; labour rights; code of conduct; SEA/SH and GBV prevention; community interaction	Information on OHS, labour conditions, worker GRM, conduct requirements, incident reporting and SEA/SH obligations	Worker induction, toolbox talks, OHS training, code of conduct signing, worker meetings, worker grievance channels
CSOs, faith-based groups, consumer groups and academia	Social accountability; inclusion; consumer protection; gender and disability inclusion; environmental management; transparency and grievance performance	Access to project information, consultation outcomes, grievance summaries, monitoring reports and opportunities for independent feedback	Disclosure meetings, stakeholder forums, written updates, technical briefings, public consultations, access to disclosed documents
Media	Public information; project milestones; transparency; reputational issues; misinformation risks	Accurate and timely information on project scope, benefits, risks, safeguards commitments and grievance channels	Press briefings, media releases, fact sheets, official project updates, website and social media updates
Security and emergency	Site safety; emergency access; incident response;	Early information on works schedules,	Coordination meetings, emergency planning

Stakeholder category	Key environmental and social issues, risks and impacts central to the stakeholder group	Main information and engagement needs	Appropriate engagement methods and tools
services	traffic and crowd management; protection of workers, communities and facilities	emergency routes, safety risks and incident response arrangements	sessions, site visits, contact lists, incident reporting protocols
General public and interested stakeholders	Access to information; transparency; project benefits; environmental and social performance; grievance access	Publicly available information on project design, E&S instruments, consultation opportunities, progress and feedback mechanisms	REA website, public notices, radio announcements, disclosed documents, public meetings, web-based platforms

Engagement methods will be selected and adapted based on stakeholder needs, literacy levels, disability access requirements, language, gender dynamics, security conditions, stakeholder influence, level of exposure to project impacts, and the phase of project implementation. For each selected site, the project team will use the site-specific stakeholder register to refine engagement methods and ensure that affected persons, vulnerable groups and interested stakeholders receive information in a form and manner they can understand and use.

Table 4.3: Methods for Information Provision, Feedback, Consultation, and Participation

Method/Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Distribution of Printed Materials (Leaflets, Brochures, Fact Sheets)	To provide information to local, regional, and national stakeholders, including regular updates.	Concise, understandable materials on project details, environmental impacts, and benefits. Visual aids included.	Printed and distributed at consultation meetings, awareness campaigns, community centers, and through public outreach.	Government ministries, project-affected parties, NGOs, public stakeholders	Regularly during project lifecycle
Newsletters/Updates	To maintain stakeholder awareness by circulating project progress updates, milestones, and changes.	Important project milestones, announcements, changes to plans, and success stories.	Mailed or distributed through community meetings, media, and project-specific channels. Feedback forms included for input.	All affected parties, interested stakeholders, implementing agencies	Quarterly throughout the project
Radio/TV Broadcasts	To reach broad stakeholder groups with information about project updates and public hearings.	Project updates, development benefits, project activities, public events, and announcements.	Collaborating with local radio and TV stations, documentaries, and feature stories on national stations.	Affected communities, local and regional stakeholders	Weekly updates
Focus Group Meetings	Small group discussions to gain insights on specific issues, particularly from vulnerable or marginalized groups.	Issues related to project design, environmental and social impacts, and mitigation strategies.	Focus groups conducted within community centers or via dedicated forums.	Women, youth, elderly, persons with disabilities, vulnerable groups	As needed, especially in early phases
Surveys/Interviews	To gather baseline data, stakeholder opinions, and gather feedback on project design and implementation.	Stakeholder views, concerns, and baseline data on project's potential impacts and benefits.	Administered in person, by phone, or through community outreach events.	Affected communities, project beneficiaries, NGOs, and partners	Once every 6 months
Public Consultations	Open public forums to update stakeholders, engage in open dialogue, and collect feedback on project design and impacts.	Detailed information on project components, risks, mitigation strategies, and expected benefits.	Held in community halls, local centers, and televised via public platforms.	Affected communities, local residents, businesses, NGOs, government representatives	Annually, as required

Method/Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Information Centers/Field Offices	Physical spaces where stakeholders can access project information, leave feedback, or ask questions.	Project updates, technical documents, feedback forms, and community information on energy access.	Public announcements, accessible hours for consultation.	Local communities, NGOs, public stakeholders	Ongoing, accessible throughout project
Dedicated Hotline	A direct communication line for stakeholders to inquire about the project or submit feedback.	Information about the project and mechanism for raising concerns or grievances.	Available on project materials, advertised in community centers and through mass media.	Project-affected parties, general public	Available throughout project lifecycle
Web-based Platform	A dedicated website for sharing updates, information, feedback, and facilitating online consultations.	Project updates, environmental and social safeguards, procurement information, and community feedback mechanisms.	Accessible via project website and linked social media platforms (Facebook, Twitter, YouTube).	Stakeholders with internet access, particularly younger audiences and businesses	Continuous throughout the project

4.3 Stakeholder engagement plan by project phase

Stakeholder engagement will be carried out throughout the project lifecycle as summarized below, ensuring timely information disclosure, consultation, and feedback at each phase.

Table 4.4: SEP by Project Phases

Project phase	Indicative timeline/ frequency	Main objectives	Priority stakeholders	Indicative methods	Lead responsibility
Pre appraisal and early preparation	During project preparation and before appraisal	Share project concept, gather design inputs, identify major E&S issues, disclose SEP and other draft instruments	AfDB, REA, MDAs, regulators, developers, beneficiary institutions, CSOs	Technical meetings, disclosure, concept consultations, focused interviews	REA PMU
Site screening and design finalization	From site shortlisting through detailed design finalisation	Validate local context, confirm affected parties, identify vulnerable groups, capture site specific concerns	Host communities, local authorities, institutions, nearby businesses, user groups	Site visits, community meetings, FGDs, interviews, disclosure notices	REA with developer or contractor and site authorities
Pre-construction	Before contractor/ developer mobilisation and before physical works commence	Explain scope of works, schedule, access arrangements, jobs communication, grievance channels, safety measures	Host communities, campus and facility users, contractors, workers, local authorities	Public meetings, noticeboards, leaflets, radio, toolbox induction	REA, contractor or developer
Construction and installation	Throughout construction and installation, with routine engagement at least monthly or as site conditions require	Maintain two-way communication on works progress, traffic, disruptions, incidents, labor issues, grievances	Host communities, local authorities, workers, nearby businesses, institutions	Routine meetings, hotline, noticeboards, small group outreach, issue-based briefings	Contractor or developer under REA oversight
Operation and O&M	Throughout operation, with periodic engagement at least quarterly during the first year of operation	Communicate service arrangements, maintenance schedules, safety, complaint channels, user responsibilities	End users, institutions, community representatives, operators	User meetings, helpdesk, service notices, periodic stakeholder review	Operator and REA

Project phase	Indicative timeline/ frequency	Main objectives	Priority stakeholders	Indicative methods	Lead responsibility
	and thereafter as required				
Decommissioning or major rehabilitation	Before and during any decommissioning, major rehabilitation or material change in project operation	Inform users of transition plans, environmental and safety controls, and post use arrangements	Affected communities, institutions, regulators, workers	Formal notice, consultation, issue based meetings	REA and responsible operator

The timelines below are indicative and may be adjusted based on component readiness, site selection, procurement schedule, implementation risks and stakeholder needs. Engagement will remain continuous across the full project lifecycle and will not be limited to preparation or early implementation.

4.4 Special provisions for selected components

The same engagement template cannot be applied in the same way across all components. The project therefore adopts the following component specific focus.

- Interconnected mini grids - Community entry, land related matters, route alignments, customer communication, local employment information, traffic and safety notices, and grievance access will be the main engagement priorities.
- Healthcare facilities - Engagement shall include facility management, health workers, local authorities, users of the facility, and nearby residents. Timing of works should take account of service continuity, patient safety, and emergency access.
- Universities and teaching hospitals - Engagement shall cover management, works departments, student bodies, host communities, commercial users on campus, hospital users, and security teams. Construction timing, safety, access control, and grievance channels shall be clearly communicated.
- Technical assistance and capacity building - The focus here will be sector actors, REA teams, market participants, institutions, and service providers involved in implementation and learning.

4.5 Information Disclosure Strategy

Disclosure under Desert to Power will be practical, not symbolic. The aim is not only to place documents on websites, but rather to disseminate the right information to the right people in time for them to react to it.

4.5.1 Information that will be disclosed

The following categories of information will be disclosed to stakeholders throughout the project lifecycle to ensure transparency, informed participation, and effective feedback.

- Project description, objectives, components, and implementation approach.
- Likely benefits and likely environmental and social risks relevant to each component or site.
- Draft and final E&S instruments that require disclosure.
- Planned consultation dates, venues, and channels.
- Works schedules, expected disruptions, traffic management information, safety notices, and access arrangements at site level.
- GRM procedures, contact points, and escalation routes.
- Periodic updates on project progress and how stakeholder feedback has been treated.

4.5.2 Disclosure timetable and trigger points

Given that the dates for final site selection, site-specific design completion, contractor/developer mobilization, and commencement of physical works are not yet fixed for all components, this SEP adopts a trigger-based disclosure timetable. This approach ensures that disclosure and consultation are undertaken at the appropriate decision points in the project cycle, rather than relying on fixed calendar dates that may change as project preparation and implementation progress.

Where site visits, screening visits, ESIA scoping visits, or consultation visits have already been undertaken, the dates, locations, participants, attendance records, minutes and photographic evidence will be documented in the relevant consultation annexes. For future site visits and consultations, dates will be communicated to relevant stakeholders in advance through appropriate channels, including formal invitations, local notices, direct correspondence, community leaders, institution focal persons, and other locally suitable means.

Table 4.5: Disclosure timetable

Trigger	Required disclosure or engagement action	Timing
Draft SEP and other draft E&S instruments ready for public review	Public disclosure through REA, Bank and Regulators channels and consultation notice	At least 21 days before appraisal or instrument finalization, as applicable
Site shortlist confirmed for a component	Prepare site stakeholder register and begin local notice and consultation planning	Within 10 working days of shortlist confirmation
Site design confirmed and works package being prepared	Carry out site level disclosure and consultation on likely impacts, mitigation, access, and grievance channels	Before contractor or developer mobilization
Contract award and	Issue works notice, contact details, GRM	Before physical works start

mobilization	channels, and local liaison arrangements	
Material project change or incident trend	Update stakeholder information and repeat consultation where needed	As soon as practicable after the change is known
Annual SEP review	Review delivery, gaps, complaints trends, and update needs	Once every 12 months at a minimum

4.5.3 Disclosure channels

In line with stakeholder engagement objectives, multiple disclosure channels will be employed to effectively reach diverse stakeholder groups and facilitate access to project information.

Table 4.6: Disclosure channels

Channel	Typical use	Main audience
REA website and related digital platforms	Program level documents, updates, notices, procurement information	Institutions, developers, CSOs, public users with internet access
Printed copies at designated public locations	Disclosure of SEP and other public documents	Communities, public institutions, local authorities, interested parties
Notice boards and posted site notices	Works start notices, safety notices, contact details, public meeting notices	Host communities, campus and facility users, nearby businesses
Radio and local announcements	Meeting notices and simple public updates in local language where needed	Wider local audience, low literacy groups
Meetings and focus groups	Disclosure plus two-way discussion	All major stakeholder groups, especially affected parties
Direct correspondence	Formal briefs, invitations, response letters, technical communication	AfDB, MDAs, regulators, developers, campus and facility authorities

4.6 Reporting Back to Stakeholders

Ongoing transparency is a cornerstone of effective stakeholder engagement. REA will not treat consultation as a one-way information collection exercise. After key engagement rounds, REA or its delegated site team will issue a short feedback note showing the main issues raised, the project response, and any agreed next step. At site level, this can be done through meeting readouts, noticeboard summaries, simple leaflets, or digital circulation. At program level, this can be done through progress briefs and periodic stakeholder summaries. REA will adopt the most effective and efficient medium in line with applicable context.

As the DtP project moves forward, regular feedback loops will be established to ensure that stakeholders are continuously updated on project developments, performance against the Environmental and Social Management Plan (ESMP), and responses to concerns raised through the

Grievance Redress Mechanism (GRM).

Key methods of reporting back to stakeholders will include:

- **Regular Updates and Bulletins**: The Rural Electrification Agency (REA) will issue periodic reports summarizing the progress of the project, stakeholder concerns, and responses to those concerns. These reports will be distributed widely to both directly affected communities and other interested stakeholders.
- **Project Performance Reviews**: Regular updates on the performance of the project, including the E&S performance, will be shared through public forums and media announcements. This will help track project implementation and provide stakeholders with insights into the achievement of social and environmental goals.
- **Independent Audits**: Where necessary, the project will commission third-party audits to assess both environmental and social performance, with audit results shared with stakeholders to maintain transparency and build trust.
- **Feedback Mechanism**: Responses to feedback and grievances will be systematically documented and communicated back to stakeholders, ensuring that they understand how their input has influenced project implementation.

Stakeholders will have access to project information throughout the cycle, with mechanisms for them to track how their concerns have been addressed. This will be managed through a comprehensive feedback mechanism, ensuring that all groups, especially vulnerable stakeholders, have the opportunity to participate in the process.

5.0 RESOURCES, RESPONSIBILITIES AND BUDGET FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

Successful SEP delivery depends on clear roles, budgeted activities, and field level follow-up. The Project Management Unit (PMU), domiciled within the Rural Electrification Agency (REA), will oversee the implementation of all stakeholder engagement activities. The management, coordination, and execution of the Stakeholder Engagement Plan (SEP) will be the responsibility of a dedicated team within the PMU, supported by local subcontractors and consultants. This team will work closely with regional, state, and local authorities, as well as affected communities and key project stakeholders.

To ensure the success of the SEP, a clear and effective organizational structure will be established, with roles and responsibilities clearly defined for the relevant stakeholders at all levels of the project. The PMU will work in close collaboration with relevant government ministries and regulatory bodies, particularly the Federal Ministry of Finance (FMoF) and the Federal Ministry of Power (FMoP), to ensure alignment with national policies and financing structures.

REA (PMU) will appoint an SEP Lead (social specialist) responsible for SEP delivery, supported by Community Liaison Officers (CLOs) as needed for subproject clusters. Contractors and developers will appoint site-level E&S staff with stakeholder engagement responsibilities and will comply with SEP provisions through contract clauses and supervision.

REA will allocate resources for: (i) engagement delivery; (ii) disclosure materials; (iii) GRM staffing and systems; (iv) SEA/SH safe reporting and referral; (v) monitoring, reporting, and independent verification where required; and (vi) secure recordkeeping and data protection.

The overall goal is to ensure that all necessary resources, human, financial, and technical, are made available to implement stakeholder engagement strategies effectively, keeping stakeholders informed, consulted, and actively involved throughout the project cycle.

5.2 Organizational Roles and Responsibilities

The following table outlines the key roles and responsibilities within the Stakeholder Engagement Team:

Table 5.1: Roles and Responsibilities

Role	Responsibility / Accountability
REA Project Management Unit (PMU)	• Formalize and fulfil roles and responsibilities for effective stakeholder engagement at all levels. • Ensure proper implementation and follow-up of the SEP. Develop a detailed implementation plan for the DtP project, with clear objectives, activities, and monitorable deliverables. • Provide capacity building and training for effective coordination and management of stakeholder engagement. • Allocate funding for committee meetings at all levels and ensure contractors and staff are adequately informed and trained on SEP.

Role	Responsibility / Accountability
Head of Project Management Unit (PMU)	• Lead the day-to-day coordination of project activities related to stakeholder engagement. • Ensure stakeholders' interests are represented and considered during the implementation of the project, especially during subproject planning and execution. • Oversee project implementation to ensure that SEP and Grievance Redress Mechanism (GRM) are followed through every phase.
Social Safeguard Specialist of PMU	• Primary interface between the project and stakeholders. • Develop, implement, and monitor the SEP. • Identify stakeholders, assess their concerns, and ensure inclusive participation. • Lead on community grievances, feedback, and managing vulnerable groups. • Ensure timely reporting and share monitoring reports on stakeholder engagement with the PMU
Environmental Safeguard Specialist of PMU	• Work with the Social Safeguard Specialist to ensure social safeguard compliance with the SEP. • Coordinate stakeholder engagement and the grievance mechanism. • Develop and monitor the progress of the engagement plan. • Identify the vulnerable groups and manage tailored engagement strategies.
GRM Officer	• Receipt, logging, tracking, case communication, escalation management, data control, and quarterly grievance analysis.
Procurement Officer	• Support procurement processes to ensure that stakeholder engagement is integrated into the contract terms. • Ensure contractors meet community relations requirements as stipulated in the SEP.
DtP Project Employees & Contractors including Developers	• Comply with SEP provisions in project contracts. • Participate in training and follow procedures outlined in the SEP. Provide data related to SEP performance. • Implement site level engagement duties in contract scope, maintain local contact point, support GRM intake, and report site issues to REA.
Seconded Staff, IVA Consultants, and Agencies	• Assist in ensuring SEP compliance. • Provide support where necessary to meet SEP objectives and communicate concerns to supervisors.
Community Liaison Officer or site focal point	• Routine field interface with communities and local institutions, notice dissemination, meeting support, and local follow up
Campus or facility management	• Support access, user communication, internal notices, and issue resolution for their institutions.
Relevant federal, state and local authorities	• Support approvals, coordination, dispute handling, public notice, and oversight within their mandates

Role	Responsibility / Accountability
AfDB task team	• Review and evaluate safeguard compliance through periodic reports and supervision missions, and major SEP outputs at agreed milestones

The Stakeholder Engagement Team will be led by the National Project Coordinator with full responsibility for ensuring that all stakeholders are adequately engaged and their concerns are appropriately addressed throughout the project cycle.

5.3 Capacity building

Before field implementation starts, REA shall run short training sessions for all project staff and site teams who will handle stakeholder engagement or grievances. The training shall cover: stakeholder mapping; meeting records; communication in plain language; treatment of vulnerable groups; retaliation risk awareness; grievance handling; SEA/SH survivor centered response; confidentiality; and reporting formats.

The training shall be practical, role-based, and focused on the skills required for stakeholder engagement, inclusive consultation, grievance handling, confidential case management, and consistent reporting. Refresher sessions shall be conducted during implementation to address gaps identified through monitoring, supervision, and grievance trends. Table 5.2 proposes a capacity building Plan for associated with the SEP.

Table 5.2: SEP Capacity Building Plan

S/N	Training Topic	Objective	Target Participants	Key Content	Delivery Method	Timing	Lead Responsibility	Expected Output	Monitoring Indicator
1	Introduction to the SEP and stakeholder engagement requirements	To build a common understanding of the purpose, scope, and implementation requirements of the SEP across all project actors	REA project staff, PMU safeguards staff, Community Liaison Officers, site supervisors, contractors, developers, consultants	SEP objectives, stakeholder engagement principles, disclosure obligations, consultation requirements, roles and responsibilities	Short in person training session and orientation briefing	Prior to commencement of field implementation and refresher as required	REA PMU Social Specialist with support from Environmental Specialist	Project teams understand SEP obligations and their respective duties	Number of personnel trained; training attendance records; pre and post training assessment results
2	Stakeholder identification and mapping	To strengthen the ability of project teams to identify, classify, and prioritize stakeholders at project and site level	REA staff, site teams, CLOs, contractors, developers, consultants	Stakeholder categories, influence and interest analysis, vulnerable group identification, stakeholder registers, site level stakeholder mapping	Practical workshop with case examples	Before site mobilization	REA PMU Social Specialist	Project teams able to prepare, update and validate stakeholder registers and engagement plans	Number of teams trained on stakeholder identification and mapping; Number of site-specific stakeholder registers, engagement plans prepared and validated; Evidence of updates to registers following site screening or consultation.
3	Communication in plain	To improve the quality, clarity,	REA staff, CLOs,	Plain language communication,	Interactive training and	Before field engagement	REA PMU Social Specialist and	Trained teams are able to	Number of participants

S/N	Training Topic	Objective	Target Participants	Key Content	Delivery Method	Timing	Lead Responsibility	Expected Output	Monitoring Indicator
	language and inclusive consultation	and accessibility of project communications and consultations	contractors, site teams, institutional focal persons	culturally appropriate messaging, local language considerations, facilitation skills, feedback management	role play	begins and repeated during implementation where needed	Communications Focal Person	conduct quality consultations and disclosures using appropriate communication, facilitation and inclusive engagement techniques. Improved quality of consultation and disclosure activities	trained on communication techniques and inclusive consultation; number of consultation briefs translated into local languages or dialects; number of consultation sessions held in local or mixed languages; participant feedback on clarity and accessibility of disclosed information.
4	Engagement of vulnerable and marginalized groups	To equip teams to conduct inclusive engagement that does not exclude persons facing participation barriers	REA staff, CLOs, contractors, developers, consultants, institutional focal persons	Identification of vulnerable groups, barriers to participation, separate consultations where needed, gender responsive methods, disability	Focused training session with practical scenarios	Before field implementation and during periodic refreshers	REA PMU Social Specialist	Vulnerable groups are reached through adapted methods	Number of targeted sessions held for vulnerable groups; sex and vulnerability disaggregated participation

S/N	Training Topic	Objective	Target Participants	Key Content	Delivery Method	Timing	Lead Responsibility	Expected Output	Monitoring Indicator
				sensitive approaches, safe meeting arrangements					records
5	Retaliation risk awareness and safe engagement practice	To reduce risks of intimidation, exclusion, coercion, or reprisals linked to project consultations or complaints	REA staff, contractors, developers, CLOs, grievance focal persons, security related personnel where relevant	Retaliation risks, safe engagement principles, confidentiality, do no harm approach, referral and escalation of sensitive concerns	Short technical briefing	Before consultations commence and during refresher sessions	REA PMU Social Specialist with Project Management oversight	Field teams understand how to engage stakeholders without exposing them to risk	Number of staff trained; absence or reduction of retaliation related complaints
6	Grievance Redress Mechanism procedures	To build practical skills for receiving, registering, tracking, and resolving grievances in line with the project GRM	REA grievance focal persons, PMU staff, CLOs, contractors, developers, institutional grievance contacts	GRM structure, intake channels, logging, acknowledgement, screening, escalation, timelines, closure, appeals, reporting	Hands on training using grievance forms and registers	Before GRM rollout and at regular intervals	REA PMU Grievance Focal Person and Social Specialist	Functional grievance handling system at project and site levels	Number of grievance focal persons trained; percentage of grievances processed within timeline
7	SEA/SH survivor centered response	To prepare designated personnel to respond appropriately	PMU Social Specialist, GRM focal persons, CLOs,	Survivor centered principles, confidentiality, informed consent, referral pathways,	Restricted small group specialist session	Before field deployment and before contractor mobilization	REA PMU Social Specialist with qualified GBV or SEA/SH service provider	Designated personnel able to manage referrals safely and correctly	Number of designated personnel trained; referral pathway in

S/N	Training Topic	Objective	Target Participants	Key Content	Delivery Method	Timing	Lead Responsibility	Expected Output	Monitoring Indicator
		and safely to SEA/SH related complaints	selected contractor focal persons, service referral focal points	limited information handling, safe documentation, non-investigation by unqualified personnel					place at relevant sites
8	Confidentiality and data protection in stakeholder engagement and grievance management	To strengthen responsible handling of sensitive personal and grievance information	PMU staff, designated Data Protection Officer, grievance officers, CLOs, contractors, consultants	Confidential records management, restricted access, anonymization of sensitive cases, information sharing boundaries, record storage protocols, role of the Data Protection Officer or data protection focal person, and secure handling of consultation and grievance data	Technical briefing and template review session	Prior to field work and during refresher sessions	REA PMU Social Specialist/ GRM Focal Person with support from the Data Protection Officer or designated data protection focal person	Trained personnel are able to handle stakeholder engagement and grievance data securely, with guidance from the designated Data Protection Officer or data protection focal person	Number of staff trained; compliance with record keeping protocol
9	Meeting records, consultation documentation, and reporting formats	To standardize documentation and reporting across all stakeholder engagement activities	REA staff, site teams, CLOs, contractors, consultants	Attendance sheets, minutes, issue logs, photo documentation, commitment registers, reporting templates, monthly and quarterly reporting	Practical documentation workshop	Before stakeholder engagement activities begin	REA PMU Social Specialist	Consistent and auditable stakeholder engagement records	Percentage of engagement activities documented using approved templates; timeliness of report

S/N	Training Topic	Objective	Target Participants	Key Content	Delivery Method	Timing	Lead Responsibility	Expected Output	Monitoring Indicator
				requirements					submission
10	Refresher training and lessons learned review	To update teams based on implementation experience, recurring grievances, and identified weaknesses in stakeholder engagement practice	REA staff, site teams, contractors, developers, consultants	Review of field issues, grievance trends, corrective actions, good practice examples, reporting improvements	Periodic refresher workshop	Quarterly or as required during implementation	REA PMU Social Specialist and HPMU	Continuous improvement in SEP implementation	Number of refresher sessions held; corrective actions incorporated into field practice

5.4 Budget for Stakeholder Engagement

A dedicated budget of USD 850,000 is allocated for Stakeholder Engagement and is included in the Technical Assistance component of the project. This budget will cover the costs of meetings, information dissemination, and capacity building throughout the project's duration.

Table 5.3: SEP Budget

S/N	Item	Proposed Budget (USD)	Budget Coverage / Cost Basis
1	Stakeholder Engagement in Project Locations	120,000	Covers site-specific stakeholder consultations, community entry meetings, focus group discussions, meetings with affected persons, engagement with vulnerable groups, logistics for local facilitators, venue support, field mobilization, refreshments where appropriate, and documentation of engagement activities across project locations
2	Virtual Online Meetings with Project Stakeholders and State Counterparts	10,000	Covers online stakeholder meetings, internet/data support, virtual meeting platforms where required, coordination with state-level stakeholders, remote consultation sessions, and follow-up engagements where physical meetings are not practical or where hybrid participation is required.
3	Town-Hall Meetings in DtP Project Locations	60,000	Covers larger public consultation meetings in selected project communities, universities, healthcare facilities and other beneficiary locations, including venue arrangements, public address systems, translation or interpretation, community mobilization, meeting materials, and documentation.
4	Two-Day Primary Stakeholders Retreat	35,000	Covers structured engagement with key institutional stakeholders, implementing partners, regulators, developers, contractors, beneficiary institutions and relevant MDAs to review project implementation arrangements, SEP delivery, grievance management, E&S coordination and lessons for effective implementation.
5	Subsidiary Staffing of Environmental and Social Unit (Salary)	40,000	Covers support for temporary or additional E&S personnel, field assistants, community liaison support and administrative assistance required to implement SEP activities, support GRM uptake, maintain engagement records and assist with field-level coordination.
6	Stakeholder Consultative Forum	45,000	Covers periodic multi-stakeholder forums for REA, MDAs, regulators, developers, contractors, civil society, beneficiary institutions and community representatives to discuss project progress, emerging E&S issues, stakeholder concerns, grievance trends, corrective actions and implementation lessons.

S/N	Item	Proposed Budget (USD)	Budget Coverage / Cost Basis
7	Production of National Jingles for Television and Radio	80,000	Covers the development, translation, production and airing of radio and television messages to support public awareness on project objectives, consultation opportunities, grievance channels, safety messages, SEA/SH reporting channels and other key information for wider stakeholder groups.
8	Production of Newsletter and Project Information Kit	25,000	Covers preparation, design, printing and digital dissemination of newsletters, fact sheets, non-technical summaries, FAQs, project briefs, disclosure materials, stakeholder feedback summaries, and information kits for communities, institutions and interested stakeholders.
9	Monthly/Quarterly Sponsored Radio Programme	150,000	Covers periodic radio programmes and public information slots for project updates, stakeholder sensitization, disclosure of consultation schedules, safety notices, grievance redress information, responses to frequently raised concerns and outreach to low-literacy or remote stakeholders.
10	Purchase of Cameras, Audio-Visual and Public Address Systems	25,000	Covers equipment required for documenting consultations, recording stakeholder engagement evidence, supporting public meetings, improving communication during field engagements, and maintaining auditable records such as photographs, audio records and presentation materials.
11	Continuous Capacity Building, Sensitization	175,000	Covers training and refresher sessions for PMU staff, contractors, developers, CLOs, grievance focal persons and site teams on SEP implementation, stakeholder mapping, inclusive consultation, GRM procedures, SEA/SH survivor-centred response, documentation, reporting, data protection and non-retaliation.
12	Maintenance of Vehicles & Fueling	10,000	Covers vehicle fuelling, minor maintenance and field movement support for stakeholder engagement teams undertaking consultations, site visits, monitoring, grievance follow-up and disclosure activities in project locations.
13	Miscellaneous (Printing, etc.)	5,000	Covers minor administrative costs, additional printing, meeting consumables, stationery, local notices, sign-in sheets, grievance forms, folders and other incidental costs required for smooth SEP implementation.
14	Toll-Free Number	15,000	Covers establishment, operation and maintenance of a toll-free or dedicated grievance and feedback line, including call handling support, publicity of the number, tracking of complaints and integration with the project GRM system.
	Total	**850,000**	

5.5 Management Functions and Responsibilities

Effective management and documentation of stakeholder engagement activities are critical to the success of the DtP project. To ensure accountability and transparency, all engagement activities will be documented and monitored throughout the project cycle. Key responsibilities include:

1. **Documentation of Stakeholder Engagement**: Engagement activities will be thoroughly documented using the following methods:
    - Attendance lists at all stakeholder meetings.
    - Written minutes of meetings, produced by designated rapporteurs. Consultation minutes shall be prepared for all formal stakeholder engagement meetings using the template provided in Annex 1, while attendance records shall be documented using the Consultation Attendance Template provided in Annex 5.
    - Audio recordings (where applicable).
    - Photographic documentation to capture key moments of engagement (without disturbing the meeting).
    - Video recordings (where feasible).
2. **Monitoring and Reporting**: Stakeholder engagement activities will be continuously monitored to ensure that engagement objectives are being met. Monitoring will involve:
    - Regular site visits to ensure that the SEP is being implemented effectively.
    - Monitoring of community feedback and grievances through the Grievance Redress Mechanism (GRM).
    - Periodic reports on the effectiveness of stakeholder engagement and any adjustments needed to improve engagement processes.
3. **Feedback Mechanisms**: Stakeholders will be given clear and accessible means of providing feedback. The project team will actively seek input on the environmental and social performance of the project through various channels (e.g., meetings, surveys, direct consultations). Feedback will be reviewed and addressed promptly, and stakeholders will be informed of how their feedback has been considered or incorporated into project activities.
4. **Adherence to SEP**: Compliance with the SEP is a core responsibility for all project contractors, subcontractors, and stakeholders involved in the implementation of the DtP project. Non-compliance will be treated as a disciplinary matter.

6.0 GRIEVANCE REDRESS MECHANISM

A grievance can be defined as any real or perceived complaint related to the project. These complaints may arise from issues such as potential risks, adverse impacts, non-compliance with project commitments, or matters concerning employment conditions or local community benefits.

The Grievance Redress Mechanism (GRM) is a critical tool for ensuring that stakeholders, especially those who are affected by the project, have a transparent, accessible, and efficient way to address concerns, complaints, and disputes related to the project. The main objective of the GRM is to provide a timely, effective, and fair resolution of grievances, ensuring that all parties involved are satisfied with the outcome and that the project maintains strong community relations and accountability.

Objectives of the GRM

The GRM is guided by the following objectives, which define its purpose and expected outcomes:

- Receive complaints, questions, feedback, and suggestions in a simple and accessible way.
- Resolve issues early and as close as possible to the point where they arise.
- Track recurring issues and use them to improve project delivery.
- Provide a fair process with clear timelines and documented outcomes.
- Handle sensitive complaints through restricted and safe procedures.

6.1 Grievance Management

In compliance with national laws, the African Development Bank's (AfDB) OS10, and international best practices, a project-specific grievance mechanism will be set up to handle all complaints and grievances arising throughout the project lifecycle. The project will maintain a grievance redress mechanism for communities, institutions, service users, businesses, civil society, and other external stakeholders. The GRM will also sit alongside worker grievance arrangements under the Labor Management Procedure. The project level GRM will not block access to the courts, statutory remedies, or the AfDB Independent Recourse Mechanism.

The grievance process is being designed to collect, collate, assess, and resolve stakeholders' concerns related to the project. The GRM is not only a legal requirement but also an essential pillar of the Stakeholder Engagement Plan (SEP), ensuring that project stakeholders are empowered to voice concerns and collaborate on solutions (IFC, 2009).

Key Features of the GRM:

- The mechanism is accessible to all stakeholders at every project stage, including pre-implementation, construction, and operational phases.
- The process will be transparent, ensuring that all concerns are recorded, tracked, and resolved promptly.
- Dedicated communication materials (such as GRM brochures or pamphlets) will be developed and distributed to help stakeholders understand the grievance process and their rights in the matter.

- Grievances can be submitted informally or formally, ensuring flexibility and responsiveness.
- A dedicated grievance coordinator and community liaison officers will manage the GRM to maintain an effective flow of information.

Grievance Redress Process Flow:

The grievance redress process will follow a clear and well-defined path (refer to Figure 6.1: Grievance Redress Mechanism flowchart).

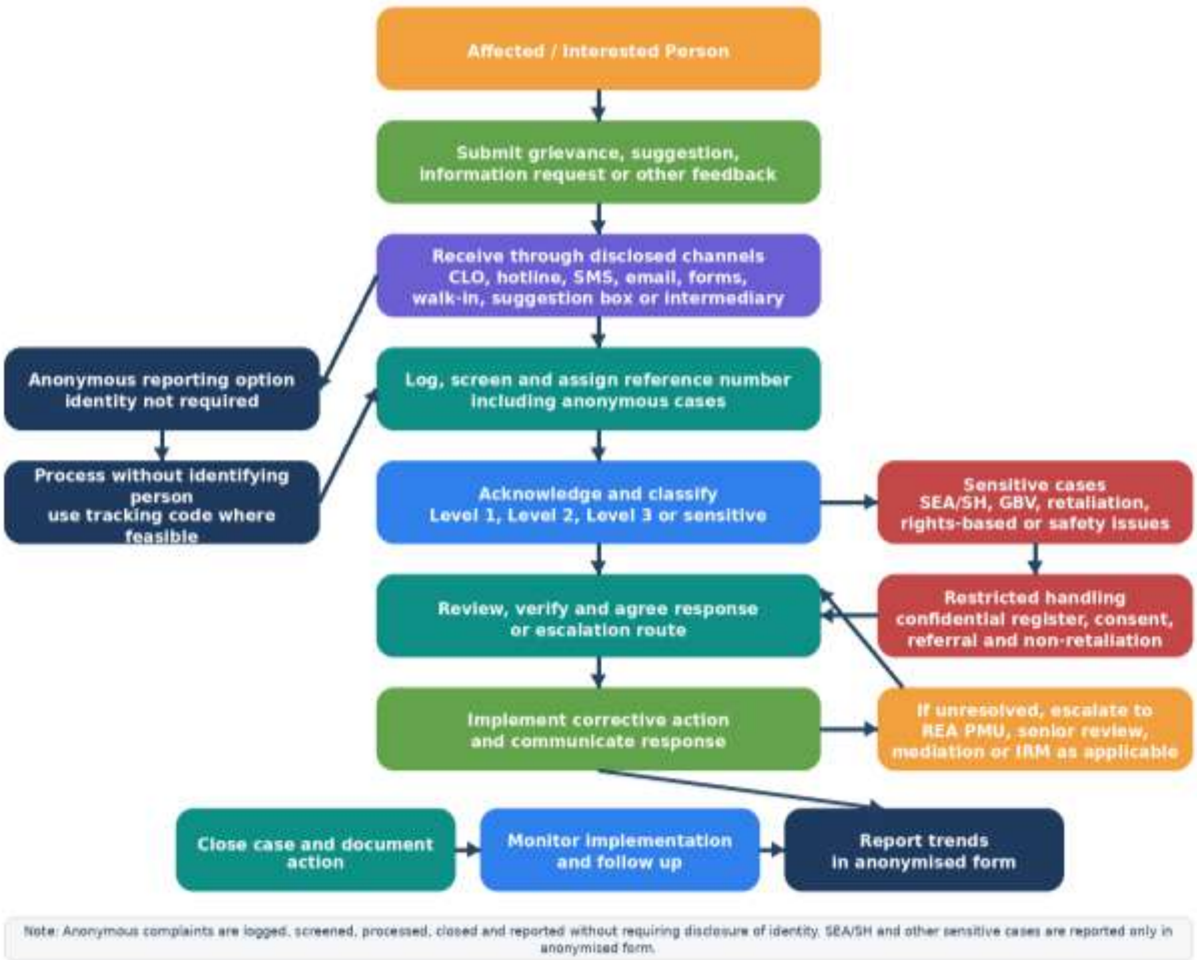


Figure 6.1: Example of Grievance Redress Mechanism Flowchart

6.2 Description of Grievance Redress Mechanism

The GRM process will allow stakeholders to lodge grievances at any time. If a complainant is unsatisfied with the proposed resolution, an appeal process will be available to escalate the issue and ensure a fair decision.

Grievance Redress Process Table (Table 6.1) outlines the steps involved in managing grievances, from identification to resolution:

Table 6.1: Grievance Redress Process and Timeline

Process	Description	Time Frame	Other Information
Step 1: Submission by Affected / Interested Person	Grievances may be reported through multiple channels, including face-to-face reporting, toll-free telephone line, SMS, WhatsApp where applicable, email, project website or online form, written grievance forms, walk-ins, suggestion boxes, community meetings, site visits, contractor/developer site offices, REA PMU, Community Liaison Officers, institution focal persons, local government offices, traditional/community leaders, women/youth/disability focal points, and other agreed local uptake points. Anonymous complaints may also be submitted through channels that do not require the complainant to disclose their identity, such as suggestion boxes, hotline/SMS, online forms or trusted intermediaries.	1 Day from receipt	Grievances can be submitted to REA, PMU grievance desk, contractor/developer focal persons, CLOs, institution focal persons, local authorities, community structures, or through any disclosed grievance uptake channel. No complainant shall be required to disclose their identity for a complaint to be registered.
Step 2: Receipt, Logging, Screening and Reference Assignment	The grievance will be entered into the grievance register (using the grievance log form in Annex 3) and screened to determine its nature, urgency, sensitivity, responsible party, and level of significance (Level 1-3). Anonymous grievances will also be logged and assigned a reference number or tracking code where feasible. Sensitive complaints, including SEA/SH, GBV, retaliation, discrimination or abuse, will be recorded in a restricted confidential register and handled through the sensitive complaints pathway.	Within 3 working Days	Grievances may be categorized as Level 1: minor or one-off issue; Level 2: repeated, moderate or unresolved site-level issue; Level 3: serious, sensitive, legal, safety, rights-based or high-risk issue requiring urgent escalation. Anonymous complaints shall be assessed based on the information provided and investigated to the extent possible without seeking to identify the complainant.
Step 3: Acknowledgement and Classification	Acknowledgement of the grievance will be provided to the Acknowledgement will be provided to the complainant, confirming receipt of the grievance, explaining the likely course of action, expected timelines, and available escalation options. Where the complaint is anonymous and no contact details are provided, direct acknowledgement may not be possible; however, the complaint will still be logged, assessed and processed.	Within 3 working Days after logging	Acknowledgement may be provided verbally, by SMS, phone call, email, written note, or through the same channel used to submit the complaint. For anonymous complaints, feedback may be provided through general public updates, noticeboards, the same anonymous channel, or other safe

Process	Description	Time Frame	Other Information
	Where a tracking code is available, the complainant may use it to follow up without disclosing identity.		means where feasible.
Step 4: Review, Verification and Response Development	The appropriate project team, contractor/developer, institution focal person, safeguards team or GRM officer will review the grievance, verify facts, consult relevant parties where necessary, and develop a proposed response or corrective action. For anonymous grievances, verification will rely on available evidence, site checks, records review, interviews and other non-identifying methods.	Within 4–8 working days, depending on complexity	Input may be required from environmental and social specialists, contractors, developers, facility managers, local authorities, technical teams or other responsible parties. Sensitive grievances shall not be investigated through routine fact-finding that could expose the complainant or survivor to harm.
Step 5: Response Approval or Escalation	The proposed response or corrective action will be reviewed and approved by the appropriate authority based on the level and nature of the grievance. Simple site-level grievances may be approved at site/component level, while complex, sensitive or high-risk grievances will be escalated to the REA PMU or senior management as required.	Within 8–15 working days, depending on complexity	Approval may involve the Social Safeguard Specialist, GRM Officer, Environmental Safeguard Specialist, contractor/developer management, facility management, PMU leadership or other relevant authorities. Urgent health, safety, SEA/SH or retaliation-related issues shall be escalated immediately and shall not wait for routine approval timelines.
Step 6: Corrective Action and Communication of Response	The approved corrective action or resolution will be implemented and communicated to the complainant. Where the complainant is known, feedback will be provided directly through the agreed communication channel. Where the complaint is anonymous, the project will still implement corrective actions and may communicate general outcomes through noticeboards, public updates, the same anonymous channel or other safe feedback routes, without attempting to identify the complainant.	Within 5–9 working days after approval, or longer where implementation requires additional time	Feedback and progress updates shall be shared with the complainant where contact is available. For unresolved grievances, the complainant shall be informed of escalation options. Anonymous complaints will remain eligible for escalation where the issue is serious, recurring, substantiated or requires PMU-level action.
Step 7: Closure, Monitoring and	Once the grievance has been addressed, the case will be documented as closed, including the issue raised,	Within 3 working days	Closure records shall protect personal data and confidentiality. SEA/SH and

Process	Description	Time Frame	Other Information
Anonymised Reporting	actions taken, responsible persons, date of closure and any follow-up required. Anonymous grievances will also be closed in the register once corrective action has been taken or the issue has been investigated to the extent possible. Trends from grievances will be analyzed to improve project implementation.	after resolution or agreed action	other sensitive cases shall be recorded only in anonymised form in general reporting, with detailed records kept separately under restricted access.

Grievance tiers

- Tier 1, site or component level. The first attempt at resolution will be at the nearest practical level, usually through the developer, contractor, operator, university authority, facility management, or site focal point working with the community liaison structure.
- Tier 2, REA PMU level. If the issue is not resolved at site level, or if the complaint concerns a site team directly, the case moves to the REA PMU grievance desk for review and decision.
- Tier 3, senior review or independent mediation route where needed. Complex or contested cases may be referred to higher level project management, a standing review panel, or another agreed neutral route. This tier shall not be used to delay urgent action in simple cases.

6.3 Grievance Resolution Framework

The framework for resolving grievances under the DtP Project will be based on six comprehensive steps to ensure transparency, efficiency, and accountability. These steps are outlined below:

1. **Reception**: Stakeholders can submit grievances through several channels, including grievance forms, email, telephone hotlines, suggestion boxes, and walk-ins at local offices. This is the initial stage where a grievance is officially logged. All grievances received through the project GRM shall be recorded using the Grievance Log Form provided in Annex 3.
2. **Sorting and Processing**: After receiving a grievance, each unit of the Project Team will sort and assess the grievance based on severity and impact. The grievance will be forwarded to the appropriate desk or team for action. Each department will have a designated contact person for grievance processing.
3. **Acknowledgement and Follow-up**: Within seven (7) days, the grievance receiver will acknowledge the grievance and communicate an estimated timeline for resolution to the complainant. This communication will also include details on the process for escalation if necessary.
4. **Verification, Investigation, and Action**: The grievance will be investigated, and the underlying causes will be examined. The Project Team will assess the validity of the complaint and propose a suitable resolution. This process will be well-documented, and the complainant will be kept informed.
5. **Monitoring and Evaluation:** Regular monitoring will track the status of the grievance resolution (through the Grievance Register Template provided in Annex 4). The grievance register will be maintained by the project, tracking the grievance's progress and ensuring timely resolution.
6. **Providing Feedback:** The complainant will be informed of the final resolution. The feedback loop will be closed by informing the complainant whether the grievance was resolved and, if not, the options available for further escalation. Where appropriate, follow-up meetings will be held to ensure satisfaction.

6.4 DtP Grievance Escalation Process

The escalation process provides various channels for stakeholders to escalate unresolved grievances. If a grievance cannot be satisfactorily resolved at the site or subproject level, it will be escalated to the Grievance Unit at the PMU (REAs grievance unit). The following channels will be available for grievance escalation:

- Toll-free telephone hotline / SMS line
- Dedicated email addresses for grievances
- Grievance forms via email, physical submission, or online submission via the REA website or project-specific grievance portal.

- Walk-ins at designated grievance offices
- Suggestion boxes at agreed locations.
- Referral through community leaders, institution focal points, or CLOs.
- Anonymous submission route for people who do not want to disclose identity

Once grievances reach the PMU, the grievance focal points will ensure that the issues are reviewed, tracked, and escalated as needed. If the grievance cannot be resolved at the PMU level, it will be referred to external bodies, such as the African Development Bank or local legal authorities, as per the project guidelines.

6.5 Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and other sensitive complaints

Addressing Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) is a crucial part of the grievance management process for the DtP Project. SEA/SH complaints require a different handling route. The project will adopt the three key guiding principles of confidentiality, informed consent, and survivor safety when responding to complaints related to GBV or SEA. This survivor-centered approach ensures that cases are handled with empathy, privacy, and support. The purpose of the project GRM in such cases is not to investigate survivor narratives in a routine way. Its first task is to receive the report safely, protect confidentiality, explain available options, and link the survivor to support services if the survivor wishes.

Key elements of the GBV and SEA mechanism include:

- All GBV-related complaints will be handled confidentially, and a separate register will be kept specifically for these cases, which will only be accessed by relevant, authorized personnel.
- Survivors will be referred to trusted service providers, including healthcare providers, counseling services, and legal support.
- The African Development Bank (AfDB) will be kept informed of any SEA/SH allegations that occur in the course of the project, subject to the survivor’s consent.
- Disciplinary actions will be taken in line with project policies, and the project will ensure that legal recourse is provided if survivors wish to pursue action against perpetrators.

Retaliation risk and confidentiality: Where there is concern that a complainant or participant could face intimidation, reprisal, discrimination, or social pressure for speaking up, the project will offer confidential channels and will limit the sharing of identifying information. Site teams shall also avoid holding sensitive meetings in settings that expose complainants or vulnerable participants unnecessarily.

6.6 African Development Bank Independent Recourse Mechanism (IRM)

In line with AfDB's policies, any project-affected community members or individuals who feel adversely impacted by the project may submit complaints to the African Development Bank's (AfDB) Independent Recourse Mechanism. The Bank's IRM offers an independent mechanism for complaints regarding the non-compliance of the Bank's projects, including this one. The IRM is separate from the project GRM and should be disclosed correctly in all public information materials.

Complaints can be submitted in local languages or English, and they should clearly describe the adverse impacts and be supported by any available documentation. Complainants will be informed of the status of their complaints and can escalate them if not satisfied with the response.

7.0 MONITORING, REPORTING AND SEP UPDATING

7.1 Summary of SEP implementation monitoring and reporting approach

Effective monitoring and reporting are essential to ensure the success of the Stakeholder Engagement Plan (SEP) throughout the Desert to Power (DtP) project lifecycle. The SEP will be regularly updated to reflect the changing project context, stakeholder concerns, and any modifications to the project schedule or activities. These updates ensure that the plan remains relevant and effective in engaging stakeholders, addressing concerns, and complying with national regulations and AfDB safeguards.

Stakeholder engagement activities will be continuously monitored, and their effectiveness will be assessed through the use of key performance indicators (KPIs), which will allow the project team to track engagement success and make necessary adjustments. This ensures that the project team is able to evaluate the impact of engagement activities and identify areas for improvement.

In terms of reporting, the project will provide regular updates to stakeholders about the progress of the project, the status of grievances, and any changes made to engagement methods or activities. Reporting will occur at various levels, from local communities to national regulatory authorities.

There are two key components to the monitoring and reporting process:

- Short-Term Monitoring: This is conducted during engagement activities to make real-time adjustments based on stakeholder feedback.
- Post-Engagement Review: Following the completion of each engagement activity, an assessment will be made to evaluate its effectiveness in achieving the desired outcomes.

Key performance indicators for each stakeholder engagement phase will allow for both the monitoring and evaluation of progress. This includes assessing the number of consultations, the nature of stakeholder feedback, and the timely resolution of grievances.

7.1.1 Reporting

Monitoring the effectiveness of stakeholder engagement helps ensure that communication channels remain transparent and that stakeholder concerns are addressed in a timely manner. Specific reporting activities will focus on:

- Short-Term Monitoring: During each engagement activity (e.g., meetings, workshops, consultations), the project team will monitor the quality of interactions and identify any immediate improvements or adjustments that need to be made for the next engagement session.
- Post-Engagement Review: After each engagement activity or phase, the project team will conduct a review to assess whether the engagement activities were successful in addressing stakeholder concerns and fulfilling the objectives of the Stakeholder Engagement Plan (SEP). A final review of public engagement will be conducted at the end of the project phase to determine how well the project achieved its engagement goals.

Table 7.1 below outlines the Key Performance Indicators (KPIs) for each phase of the project to measure the effectiveness of the SEP and engagement activities:

Table 7.1: Key Performance Indicators by Project Phase

Project Phase	Key Activities	Indicator
Preparatory & Planning Phase	Preliminary stakeholder engagement on project design, anticipated environmental and social risks and impacts, disclosure of draft E&S instruments, official correspondence, stakeholder mapping, and notification through appropriate communication channels.	• Number of stakeholder engagement meetings, technical meetings, public consultations and focus group discussions conducted. • Number and categories of stakeholders consulted, disaggregated where feasible by gender, stakeholder group, institution, location and vulnerable/disadvantaged group. • Number of women, youth, persons with disabilities, elderly persons, low-income groups, minority groups, smallholder farmers, productive users and other vulnerable/disadvantaged groups reached during consultations. • Number of stakeholder engagement reports, minutes, attendance sheets and photo records prepared and filed. • Number of E&S instruments and non-technical summaries disclosed. • Number and type of disclosure channels used, including website, letters/emails, radio, posters, public notices, meetings and direct correspondence. • Number of stakeholder comments received during preparation and number reflected in project design, SEP, ESMP or other E&S instruments.
Project Implementation Phase	Site-specific stakeholder mapping, disclosure of site-specific information and E&S instruments, community entry, public meetings, town halls, focus group discussions, engagement with affected persons and vulnerable groups, contractor/developer engagement, operation of GRM, SEA/SH-sensitive complaint pathway, and reporting back to stakeholders.	• Number of site-specific stakeholder registers prepared and updated. • Number of project sites where site-level disclosure and consultation were completed before mobilization. • Number of consultations conducted by location, component and stakeholder category. • Number of participants reached, disaggregated where feasible by gender, age group, disability status, stakeholder type, vulnerable/ disadvantaged group and location.

Project Phase	Key Activities	Indicator
		• Number of consultations specifically held with women, youth, persons with disabilities, elderly persons, low-literacy groups, smallholder farmers, productive users, landowners/ occupiers and other vulnerable/ disadvantaged stakeholders. • Number and type of disclosure materials produced and distributed, including local language materials where required. • Number of grievances received, acknowledged, resolved, closed and pending within the prescribed timelines. • Number and type of grievances received by category, including land/access, construction disturbance, labour, community health and safety, service quality, SEA/SH/GBV, exclusion, retaliation/reprisal, and other E&S issues. • Number of SEA/SH and GBV-related complaints received through confidential channels, referred to appropriate service providers, and managed in line with survivor-centred principles, reported only in anonymized form. • Number of reprisal, intimidation, discrimination or retaliation-related complaints received, assessed and addressed. • Number of grievances escalated from site/component level to REA PMU level. • Number of grievances escalated to senior review, independent mediation or other agreed escalation route. • Number of complaints submitted or escalated to the AfDB Independent Recourse Mechanism, where applicable. • Number of monitoring visits, field visits, supervision missions or third-party reviews conducted.
Project Completion Phase	Final stakeholder engagement review, close-out consultations, final grievance review, reporting on stakeholder feedback, documentation of lessons	• Final SEP implementation report prepared and submitted. • Number of close-out consultations or feedback meetings held with affected stakeholders,

Project Phase	Key Activities	Indicator
	learned, and disclosure of project close-out information to relevant stakeholders.	beneficiary institutions, communities and relevant authorities. • Total number of stakeholders engaged across the project lifecycle, disaggregated where feasible by sex, stakeholder category, vulnerable/disadvantaged group and location. • Total number of consultations, focus group discussions, town halls, institutional meetings and disclosure activities completed. • Total number of grievances received, resolved, closed, pending or escalated at close-out. • Number of unresolved grievances with agreed action plan, responsible party and completion timeline. • Total number of SEA/SH and GBV-related complaints received and referred through the confidential pathway, reported only in anonymized form. • Total number of reprisal, intimidation, discrimination or retaliation-related complaints received and addressed. • Total number of grievances escalated to the AfDB Independent Recourse Mechanism, where applicable. • Key lessons learned documented and integrated into future stakeholder engagement, GRM and E&S management practice.

7.1.2 Stakeholder Involvement in Project Monitoring

Stakeholder involvement in monitoring is critical for ensuring that the engagement process remains inclusive, transparent, and responsive. When stakeholders are involved in the monitoring process, they not only become active participants but also help ensure that project activities align with the interests and needs of the communities.

Stakeholder involvement will be operationalized through the following strategies:

- **Engagement in Data Collection**: Stakeholders will be invited to participate in the selection of sampling methods for social surveys or external impact assessments. Where necessary, stakeholders will receive training on how to analyze and interpret survey results.
- **Direct Observation**: Affected stakeholders, especially community representatives, will be

encouraged to observe monitoring and audit activities and provide real-time feedback on project performance.

- **Grievance Follow-up**: Regular follow-up meetings will be scheduled with stakeholders to discuss the status of ongoing grievances and assess how effectively concerns are being addressed.

This inclusive approach will not only ensure accountability but will also empower communities by allowing them to take ownership of the project's environmental and social impacts.

7.2 Reporting back to stakeholder groups

Stakeholder feedback is a critical element of the monitoring and reporting process. Reporting back to stakeholders ensures that their concerns and suggestions have been heard and addressed. The Rural Electrification Agency (REA) will compile quarterly summaries and internal reports on:

- Public grievances,
- Requests for information, and
- Corrective/preventive actions taken in response.

The quarterly summaries will provide a mechanism for assessing the number and nature of complaints, as well as how effectively the project has responded. This regular feedback loop will ensure transparency and build trust between the project team and stakeholders.

Table 7.2 below outlines the types of reports to be shared with stakeholders and their frequency:

Table 7.2: Outline of Reports to Stakeholders

Report	Content	Stakeholder	Frequency
Technical Reports	Technical evaluation of project status (Occupational Safety and Health, Environmental and Social Audit)	Regulatory authorities (Ministries, Agencies)	At agreed timeline
Progress Update Reports and Annual Reports	Project development activities, challenges, local workers hiring status, progress updates	REA, African Development Bank, Implementing Agencies	Quarterly and as agreed
Media Release	Project milestones, achievements, and major announcements	Local and national media outlets	As required
Project Feedback Reports	Summary of stakeholder feedback, grievance resolution progress	Affected stakeholders, community members, NGOs	Quarterly
Updated SEP or site addendum	Revisions to stakeholder mapping, methods, timelines, and commitments	AfDB, REA, stakeholders as applicable	When triggered

Report	Content	Stakeholder	Frequency
Monthly grievance summary	Number of cases, status, themes, overdue actions, sensitive case note without identifiers	REA management and site teams	Monthly during implementation

7.3 SEP update triggers

The SEP will be updated as necessary to reflect changes in project design, context, and stakeholder dynamics. Key triggers for such updates include the following:

- Confirmation of new project sites or major changes to the site list.
- Change in project design, access routes, construction timing, or footprint with new stakeholder implications.
- Land related impacts, livelihood issues, or displacement risks identified at site level.
- Incident trends, unresolved grievances, or recurring stakeholder concerns.
- Security or retaliation risks that change the way consultations should be held.
- Material change in implementation structure, such as a new developer, EPC contractor, or operator.

At minimum, the SEP shall be reviewed once every year. Site specific addenda shall be prepared before works start at each selected location.

Annexes

Annex 1. Consultation Minutes Template

Item	Details
Project name	
Component and location	
Type of meeting	
Date and time	
Venue	
Stakeholder groups represented	
Number of participants	
Key issues discussed	
Questions raised	
Project responses	
Agreed follow up actions	
Responsible person	
Target completion date	

Annex 2. Stakeholder Register Template

Stakeholder name or group	Category	Location	Interest in project	Influence level	Potential impact or concern	Preferred channel	Special access need	Contact person	Date register was last updated Update date

Annex 3. Grievance Log Form

Field	Information to record
Reference number	
Date received	DD-MM-YYYY
How complaint was received	
Name of complainant or anonymous	
Contact details	
Location	
Complaint summary	
Category	
Immediate action needed	
Assigned officer	
Acknowledgement sent on	DD-MM-YYYY
Sensitive case flag	

Annex 4. Grievance Register Template

Ref	Date	Location	Category	Brief issue	Assigned to	Status	Date closed	Remarks

Annex 5. Consultation Attendance Template

Name	Sex	Stakeholder group	Organization	Phone or email	Signature/ Thumbprint

Annex 6. Summary of Stakeholder Engagement Undertaken During Project Preparation — Identification Mission to Imo, Plateau and Ondo States

Introduction and Purpose of the Engagement

As part of the project preparation process for the Nigeria Electrification Project Phase II – Desert to Power (DtP), the Rural Electrification Agency (REA), with the participation of the African Development Bank Environmental and Social Officer and relevant project preparation stakeholders, undertook preliminary stakeholder engagement and site reconnaissance visits to selected proposed beneficiary institutions.

The engagements were conducted in Imo, Plateau and Ondo States between 23 July and 9 August 2025, inclusive of travel dates. The visits formed part of the early environmental and social due diligence for the proposed Energizing Education Programme component and were intended to support preliminary understanding of site conditions, land availability, institutional readiness, potential environmental and social risks, and stakeholder concerns prior to finalisation of site-specific project arrangements.

The engagements also drew from lessons learned under the Nigeria Electrification Project Phase I, where some sites initially considered unencumbered during preparation later required further land-related due diligence and, in some cases, resettlement planning during implementation. Accordingly, the engagements provided an opportunity to discuss land ownership, land allocation, existing land use, farming activities, security considerations, documentation requirements, and the need to avoid or minimise adverse social impacts during site selection and implementation.

The mission team included representatives of REA, including Engr. Chigbo Nwafor, Mr. Arinze George and Mr. Johnson Adejoh, together with Mr. Prosper Esume, Desk Officer for the Energizing Education Programme, and Mr. Abbas Agbaje, AfDB Environmental and Social Officer. Engagements were held with Vice Chancellors/Acting Vice Chancellors and senior management staff of the selected institutions. Attendance sheets and photographic evidence of the engagements are attached separately to the SEP.

Summary Engagement Evidence Register

S/N	State / Location	Institution	Date of Site Visit / Engagement	Main Stakeholder Groups Engaged
1	Imo State, Owerri	Alvan Ikoku Federal University of Education, Owerri	24 July 2025	REA representatives, AfDB E&S Officer, EEP Desk Officer, University Vice Chancellor and senior management staff
2	Plateau State, Jos	University of Jos	5 August 2025	REA representatives, AfDB E&S Officer, EEP Desk Officer, University Vice Chancellor and senior management staff

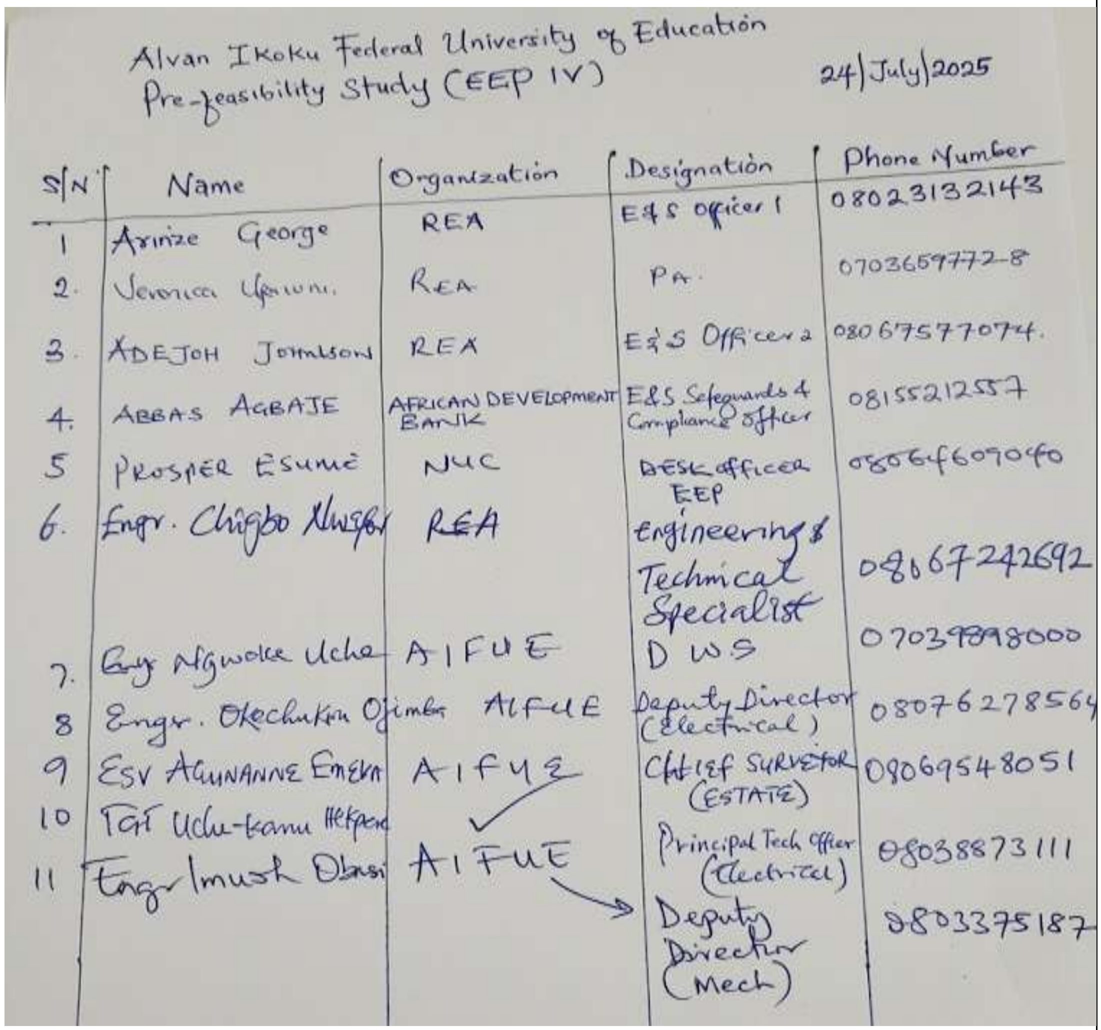
S/N	State / Location	Institution	Date of Site Visit / Engagement	Main Stakeholder Groups Engaged
3	Ondo State, Ondo	Adeyemi Federal University of Education	8 August 2025	REA representatives, AfDB E&S Officer, EEP Desk Officer, Acting Vice Chancellor and senior management staff

Main Engagement Focus - Project introduction, land availability, land ownership documentation, existing land use, staff farming activities, E&S due diligence, security considerations and project acceptance

Summary of Consultation Meeting — Alvan Ikoku Federal University of Education, Owerri, Imo State

Item	Details
Project name	Nigeria Electrification Project Phase II – Desert to Power
Component and location	Energizing Education Programme; Alvan Ikoku Federal University of Education, Owerri, Imo State
Type of meeting	Institutional stakeholder engagement and preliminary site reconnaissance
Date and time	24 July 2025
Venue	Alvan Ikoku Federal University of Education, Owerri, Imo State
Stakeholder groups represented	REA representatives, AfDB Environmental and Social Officer, EEP Desk Officer, University Vice Chancellor and senior management staff
Purpose of engagement	To introduce and discuss the proposed DtP intervention, assess institutional readiness, confirm land availability and ownership, understand existing land use, identify preliminary environmental and social issues, and document key concerns for follow-up during project preparation.
Key issues discussed	The Vice Chancellor, Professor Stella Ngozi Lemchi, confirmed that the proposed land is fully owned by the university and that up to 21.615 hectares may be available for allocation to the project. The university confirmed that it has secured the Certificate of Occupancy for the land. Existing farming activities on the land were reported to be undertaken by university staff, with appropriate allocation records maintained by the university. REA noted that the proposed panel size and rating had been considered to reduce land take and mitigate land allocation concerns. The need to consider security risks in land allocation was discussed to ensure asset integrity and long-term sustainability. The AfDB Environmental and Social Officer emphasised the need for project implementation to comply with national legislation and the AfDB Integrated Safeguards System.

Item	Details
Questions/concerns raised	Key concerns related to confirmation of land ownership, documentation of land allocation, existing staff farming activities, avoidance or management of potential land-use impacts, and security of project assets.
Project responses	REA noted that land requirements would be further reviewed during detailed site assessment and design finalisation. REA also noted that existing land use, including staff farming activities and university allocation records, would be considered during site-specific environmental and social screening and subsequent engagement. The university confirmed willingness to provide relevant legal documentation for land allocation.
Agreed follow-up actions	The university will provide relevant land ownership and allocation documentation to REA. REA will undertake further site-specific screening and due diligence before final site confirmation. Existing land use and staff farming records will be reviewed to avoid or minimise adverse impacts. Security considerations will be factored into final site selection and design.
Responsible persons/institutions	REA PMU, University Management, University Land/Estates Unit, E&S team
Target completion date	Prior to final site confirmation and contractor mobilisation

Item	Details
Evidence	

Alvan Ikoku Federal University of Education
Pre-feasibility Study (EEP IV)

24/July/2025

S/N	Name	Organization	Designation	Phone Number
1	Arinze George	REA	E&S officer 1	08023132143
2.	Veronica Ugwumi	REA	PA.	0703659772-8
3.	ADEJOH Johnson	REA	E&S Officer 2	08067577074.
4.	ABBAS AGBAJE	AFRICAN DEVELOPMENT BANK	E&S Safeguards & Compliance Officer	08155212557
5	PROSPER ESUME	NUC	DESK officer EEP	08064609040
6.	Engr. Chigbo Nwafor	REA	Engineering & Technical Specialist	08067242692
7.	Engr Ngwoke Uche	AIFUE	DWS	07039898000
8	Engr. Okechukwu Ojimba	AIFUE	Deputy Director (Electrical)	08076278564
9	ESV AGUNANNE EMEKA	AIFUE	CHIEF SURVEYOR (ESTATE)	08069548051
10	TGT Uchu-kamu Ilekpere		Principal Tech Officer (Electrical)	08038873111
11	Engr Imush Obasi	AIFUE	Deputy Director (Mech)	0803375187

Item	Details
	 Meeting with the Vice Chancellor and Senior Management Officers of the Alvan Ikoko Federal University of Education Owerri, Imo State

Summary of Consultation Meeting — University of Jos, Plateau State

Item	Details
Project name	Nigeria Electrification Project Phase II – Desert to Power
Component and location	Energizing Education Programme; University of Jos, Plateau State
Type of meeting	Institutional stakeholder engagement and preliminary site reconnaissance
Date and time	5 August 2025
Venue	University of Jos, Plateau State
Stakeholder groups represented	REA representatives, AfDB Environmental and Social Officer, EEP Desk Officer, University Vice Chancellor and senior management staff
Purpose of engagement	To introduce and discuss the proposed DtP intervention, assess institutional readiness, identify and review potential project sites, confirm land availability, understand existing land use and farming activities, and identify preliminary environmental and social risks for further assessment.
Key issues	The Vice Chancellor, Professor Tank Ishaya, confirmed that the land is fully owned by the

Item	Details
discussed	university and that adequate land may be available for the proposed project. Farming activities were reported to be undertaken by university staff, with appropriate allocation records maintained by the university for each farming season. REA noted that the proposed panel size and rating had been considered to reduce land take and manage land allocation concerns. The university identified at least three possible sites for consideration. Site 1 was described as approximately 8 hectares and located near the university entrance gate. Site 2 was located near the Faculty of Education and Postgraduate Building and measured approximately 5.6 hectares, with existing farming activity observed. Site 3 was located close to the defunct Naraguta Factory, with up to 50 hectares potentially available, although farmlands were also observed in the area. Two additional locations were visited but considered unsuitable due to the extent of farmlands and topographical constraints. The need to consider security risks was also discussed. The AfDB Environmental and Social Officer emphasised compliance with national legislation and the AfDB Integrated Safeguards System.
Questions/concerns raised	Key issues related to selection of the most suitable site, presence of farming activities, need to avoid or minimise impacts on staff farming allocations, topographical suitability, land documentation, and security of project assets.
Project responses	REA noted that the different site options would be subjected to further technical, environmental and social screening before final selection. Sites with significant farming activity, topographical constraints or other E&S concerns would require further review and may be avoided where necessary. The university confirmed willingness to provide relevant legal documentation for land allocation.
Agreed follow-up actions	The university will provide relevant land documentation and site information to REA. REA will conduct further site-specific screening of the identified sites, including review of land use, farming activities, site suitability, access, security and potential E&S risks. Final site selection will be informed by technical feasibility, land availability, E&S considerations and avoidance or minimisation of social impacts.
Responsible persons/institutions	REA PMU, University Management, University Land/Estates Unit, E&S team
Target completion date	Prior to final site confirmation and contractor mobilisation

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<tr><th>Item</th><th>Details</th></tr>
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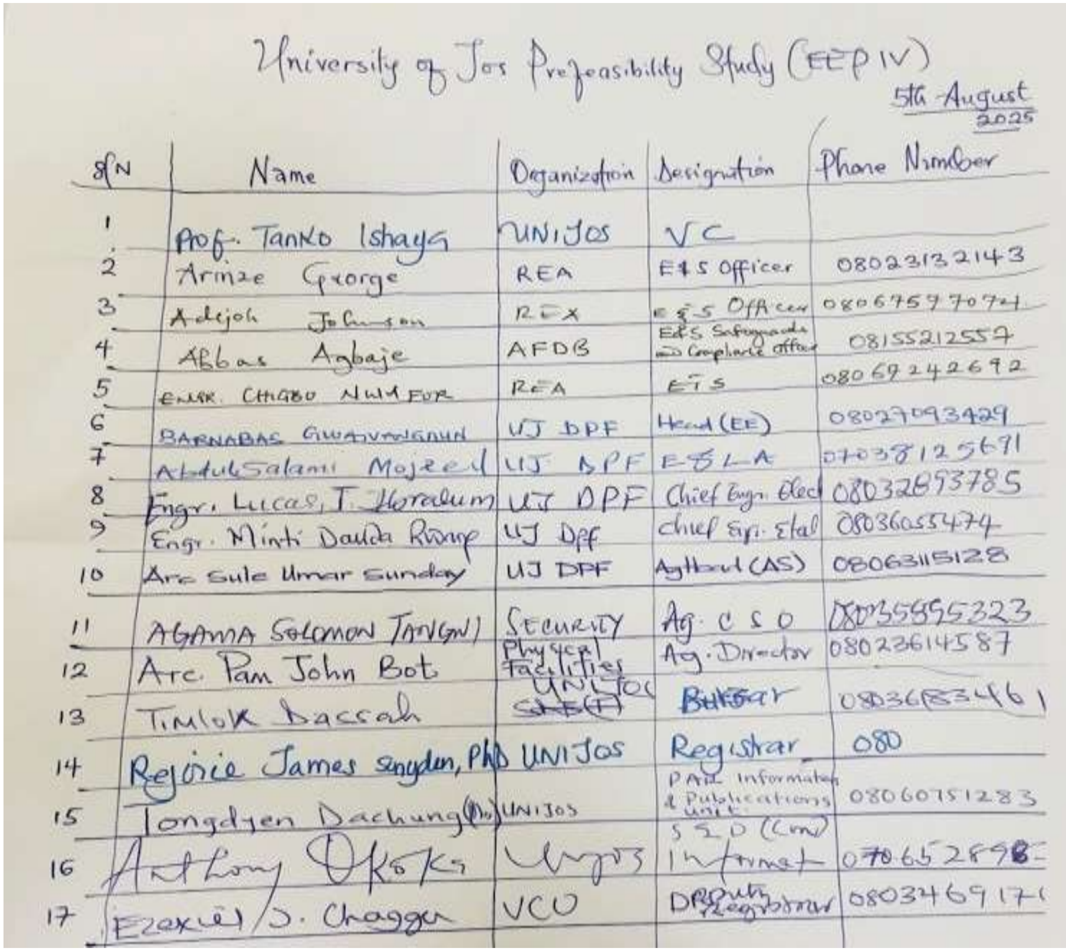

University of Jos Prefeasibility Study (EEP IV)

5th August 2025

<table>
<tr><th>S/N</th><th>Name</th><th>Organization</th><th>Designation</th><th>Phone Number</th></tr>
<tr><td>1</td><td>Prof. Tanko Ishaya</td><td>UNIJOS</td><td>VC</td><td></td></tr>
<tr><td>2</td><td>Arinze George</td><td>REA</td><td>E&S Officer</td><td>08023132143</td></tr>
<tr><td>3</td><td>Adejoh Johnson</td><td>REA</td><td>E&S Officer</td><td>08067597074</td></tr>
<tr><td>4</td><td>Abbas Agbaje</td><td>AFDB</td><td>E&S Safeguards and Compliance officer</td><td>08155212557</td></tr>
<tr><td>5</td><td>Engr. Chigbo Numfor</td><td>REA</td><td>E/S</td><td>08069242692</td></tr>
<tr><td>6</td><td>Barnabas Gwavwangaun</td><td>UJ DPF</td><td>Head (EE)</td><td>08027093429</td></tr>
<tr><td>7</td><td>Abdulsalami Mojeed</td><td>UJ DPF</td><td>E&LA</td><td>07038125691</td></tr>
<tr><td>8</td><td>Engr. Lucas, T. Horalum</td><td>UJ DPF</td><td>Chief Engr. Elect</td><td>08032893785</td></tr>
<tr><td>9</td><td>Engr. Minti Dauda Rwang</td><td>UJ DPF</td><td>chief Engr. Etal</td><td>08036055474</td></tr>
<tr><td>10</td><td>Arc Sule Umar Sunday</td><td>UJ DPF</td><td>Ag Head (AS)</td><td>08063115128</td></tr>
<tr><td>11</td><td>Agama Solomon Tangwi</td><td>Security</td><td>Ag. CSO</td><td>08035895323</td></tr>
<tr><td>12</td><td>Arc. Pam John Bot</td><td>Physical Facilities</td><td>Ag. Director</td><td>08023614587</td></tr>
<tr><td>13</td><td>Timlok Dassah</td><td>UNIJOS</td><td>Bursar</td><td>08036[illegible]461</td></tr>
<tr><td>14</td><td>Rejoice James Sunday, PhD</td><td>UNIJOS</td><td>Registrar</td><td>080</td></tr>
<tr><td>15</td><td>Longdyen Dachung (Dr)</td><td>UNIJOS</td><td>PA Information & Publications Unit</td><td>08060751283</td></tr>
<tr><td>16</td><td>Anthony Okoko</td><td>[illegible]</td><td>SSO (Com) Informat</td><td>0706528[illegible]</td></tr>
<tr><td>17</td><td>Ezekiel J. Chaggu</td><td>VCO</td><td>Deputy Registrar</td><td>0803469171</td></tr>
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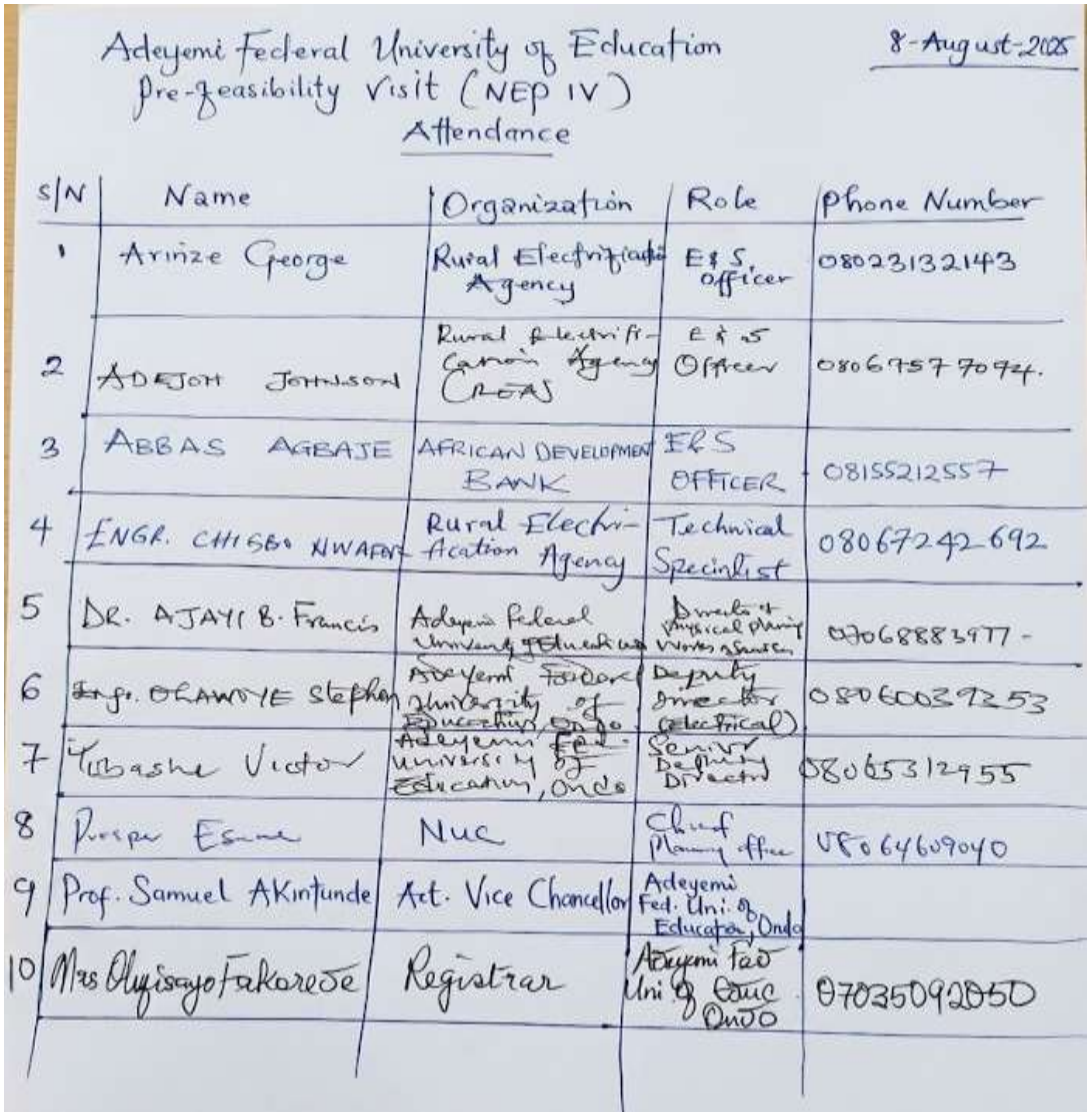
Item	Details
	Meeting with the Vice Chancellor, Registrar and Senior Officers of the University of Jos, Plateau State

Summary of Consultation Meeting — Adeyemi Federal University of Education, Ondo State

Item	Details
Project name	Nigeria Electrification Project Phase II – Desert to Power
Component and location	Energizing Education Programme; Adeyemi Federal University of Education, Ondo State
Type of meeting	Institutional stakeholder engagement and preliminary site reconnaissance
Date and time	8 August 2025
Venue	Adeyemi Federal University of Education, Ondo State
Stakeholder groups represented	REA representatives, AfDB Environmental and Social Officer, EEP Desk Officer, Acting Vice Chancellor and senior management staff
Purpose of engagement	To introduce and discuss the proposed DtP intervention, assess institutional readiness, confirm land availability and ownership, understand existing land use and nearby community interface, identify potential environmental and social issues, and document follow-up actions for project preparation.
Key issues discussed	The Acting Vice Chancellor, Professor Samuel A. Akintunde, confirmed that the land is owned by the university and that approximately 6 to 10 hectares may be available for allocation to the project. The land was reported to have been acquired in 1964, with relevant legal documentation in place. The university also noted that the campus has a perimeter fence. Farming activities on the land were reported to be undertaken by university staff, with relevant records maintained by the University Land Committee. The university further noted that some nearby communities have access to parts of the land for farming but indicated that land parcels used by nearby communities would be avoided for the purpose of the project. REA noted that the proposed panel size and rating had been considered to reduce land take and manage land allocation issues. Security considerations were also discussed as part of site selection. The AfDB Environmental and Social Officer emphasised the need for project implementation to comply with national legislation and the AfDB Integrated Safeguards System.
Questions/concerns raised	Key issues related to confirmation of land ownership and documentation, farming activities by staff, community access to some land parcels, need to avoid land parcels used by nearby communities, land allocation records, potential social risks, and security of project assets.

Item	Details
Project responses	REA noted that final site selection would consider land ownership, existing land use, community access, farming activities, security and other E&S considerations. REA further noted that areas used by nearby communities or with potential social encumbrances would require careful review and should be avoided where feasible. The university confirmed willingness to provide relevant legal documentation for land allocation.
Agreed follow-up actions	The university will provide relevant land ownership and allocation documentation to REA. The University Land Committee will support confirmation of existing staff farming allocations and areas accessed by nearby communities. REA will undertake further site-specific screening and due diligence before final site confirmation. Areas with potential community use or social encumbrance will be avoided where feasible or subjected to further assessment and consultation if avoidance is not possible.
Responsible persons/institutions	REA PMU, University Management, University Land Committee, E&S team
Target completion date	Prior to final site confirmation and contractor mobilisation

Item	Details
Evidence	

Adeyemi Federal University of Education
Pre-feasibility Visit (NEP IV)
Attendance

8-August-2025

S/N	Name	Organization	Role	Phone Number
1	Arinze George	Rural Electrification Agency	E&S officer	08023132143
2	ADEJOH JOHNSON	Rural Electrification Agency (REA)	E&S Officer	08067577094.
3	ABBAS AGBAJE	AFRICAN DEVELOPMENT BANK	E&S OFFICER	08155212557
4	ENGR. CHIGBO NWAFOR	Rural Electrification Agency	Technical Specialist	08067242692
5	DR. AJAYI B. Francis	Adeyemi Federal University of Education	Director Physical Planning Works & Services	07068883977 -
6	Engr. OLAWOYE Stephen	Adeyemi Federal University of Education, Ondo	Deputy Director (electrical)	08060039253
7	Yubashe Victor	Adeyemi Fed. University of Education, Ondo	Senior Deputy Director	08065312955
8	Prosper Esume	NUC	Chief Planning Officer	[illegible]064609040
9	Prof. Samuel Akintunde	Act. Vice Chancellor	Adeyemi Fed. Uni. of Education, Ondo	
10	Mrs Oluyisayo Fakorede	Registrar	Adeyemi Fed Uni of Educ Ondo	07035092050

Item	Details
	 Meeting with the Ag. Vice Chancellor, Registrar and Senior Officers of Adeyemi Federal University of Education, Ondo State

Key Environmental and Social Issues Identified Across the Engagements

The engagements and site reconnaissance visits identified the following cross-cutting environmental and social issues that will require further attention during site-specific screening, consultation and implementation:

- Confirmation and documentation of land ownership and land allocation arrangements before final site selection.
- Review of existing land use, including staff farming activities and any seasonal allocation records maintained by beneficiary institutions.
- Avoidance, where feasible, of land parcels used by nearby communities, staff farmers or other users in order to minimise land-related disputes or livelihood impacts.
- Need for site-specific environmental and social screening before final site confirmation, including review of land take, access, topography, existing land use, security risks and potential community interface.
- Need to ensure that final site selection considers security risks to protect project assets and support long-term sustainability.
- Need to maintain records of consultations, site visits, attendance sheets, photographs, land documentation and follow-up actions as part of the SEP and E&S due diligence process.
- Need to conduct further site-specific engagement with relevant internal and external stakeholders once proposed sites are shortlisted or confirmed.

Summary of Follow-up Actions

S/N	Follow-up Action	Responsible Institution/Person	Timing
1	Obtain and review land ownership and allocation documentation from each beneficiary institution.	REA PMU, University Management	Before final site confirmation
2	Confirm the presence, nature and extent of existing land use, including staff farming, community access or seasonal land allocation.	REA PMU, University Management, E&S team	Before final site confirmation
3	Conduct site-specific environmental and social screening for each proposed site.	REA PMU, E&S team, technical team	Before detailed design finalisation and mobilisation
4	Avoid, where feasible, land parcels with significant farming activities, community use, social encumbrance, difficult topography or security concerns.	REA PMU, technical team, E&S team, University Management	During final site selection
5	Where avoidance is not possible, undertake additional consultation, documentation and appropriate mitigation planning in line with national requirements and AfDB ISS.	REA PMU, E&S team, University Management	Before mobilisation
6	Confirm security considerations for selected sites to ensure asset integrity and long-term sustainability.	REA PMU, University Management, security units, technical team	Before final site approval

Annex 7. Consolidated Summary of University-Level Stakeholder Engagements and Pre-feasibility Visits During Project Preparation

Introduction

As part of the preparation process for the Nigeria Electrification Project Phase II – Desert to Power (DtP), the REA PMU undertook preliminary stakeholder engagements, pre-feasibility study visits, site reconnaissance and focused consultations with proposed beneficiary universities and related stakeholders. These engagements were conducted between January and May 2026 and were intended to support early project planning, stakeholder identification, land option assessment, environmental and social screening, and preparation of appropriate E&S instruments.

The engagements focused on introducing the proposed DtP intervention, assessing institutional willingness and readiness, identifying possible land options for solar hybrid power infrastructure, reviewing land ownership and documentation, observing existing land use, identifying potential environmental and social risks, and recording stakeholder concerns that should inform subsequent ESIA, ESMP, RAP or aRAP preparation, where applicable.

The engagements were held with university management teams, Vice Chancellors or their representatives, Directors of Works, Directors of Physical Planning, academic and non-academic staff, students, community leadership and other relevant institutional stakeholders.

Summary of Engagement Streams

Engagement stream	Period	Locations / Institutions	Main stakeholders engaged	Main focus
Pre-feasibility study visits and initial institutional engagements	January – March 2026	Proposed DtP beneficiary universities across Niger, Kano, Jigawa, Benue, Delta, Bayelsa, Rivers, Akwa Ibom, Oyo, Ogun, Ekiti, Osun, Kaduna, Kebbi, Adamawa and Bauchi States	REA PMU, university management, Directors of Works, Directors of Physical Planning, technical/ works departments and other institutional representatives	Initial project engagement, institutional readiness, land availability, land documentation, land-use status, site options, infrastructure readiness and applicable E&S instruments
Site reconnaissance and land option review	January – February 2026	Selected proposed beneficiary universities, including Federal University of Technology Minna, Federal University of Education Kano, Federal University of Technology Babura, Federal University of	REA PMU, university management, Directors of Works, Directors of Physical Planning and site representatives	Confirmation of land ownership, review of proposed land parcels, observation of farming activities, drainage, topography, security considerations, possible encumbrances and follow-up E&S

Engagement stream	Period	Locations / Institutions	Main stakeholders engaged	Main focus
		Health Sciences Otukpo, and selected universities in Delta, Bayelsa, Rivers and Akwa Ibom States		requirements
Focus Group Discussions and stakeholder consultations	28 April – 6 May 2026	Federal University of Health Sciences, Ila-Orangun, Osun State	Academic staff, non-academic staff, male students, female students and Owa-in-Council/community leaders	Project introduction, ESMP/ESIA preparation, construction impacts, traffic and safety risks, noise and air pollution, SEA/SH risks, waste management, access control, employment expectations, sustainability and grievance channels

Consolidated Summary of Pre-feasibility and Institutional Engagement Outcomes

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
1	Federal University of Technology, Minna, Niger State	20 January 2026	REA engaged the Vice Chancellor, Director of Physical Planning and relevant works/physical planning teams. The university confirmed ownership of the proposed land and support from its Governing Council. Three land options were identified, measuring approximately 5 ha, 15 ha and 15 ha. Land documentation, including Certificate of Occupancy, master plan, GPS coordinates, single line drawings and land-use status information, was indicated as available. Site reconnaissance showed generally fallow land, with some undulation, seasonal drainage/stream features and evidence of previous farming on one site.	ESIA required. Further review of land options, drainage/waterway issues, security, technical suitability and land-use status before final site selection.

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
2	Federal University of Education, Kano, Kano State	22 January 2026	REA engaged the Director of Works on behalf of the Vice Chancellor. The engagement confirmed that the university had already been selected under another REA solarisation intervention following an earlier energy audit for a proposed 1.5MW solar hybrid captive power plant.	DtP pre-feasibility engagement did not proceed further to avoid duplication with an existing REA intervention.
3	Federal University of Technology, Babura, Jigawa State	23 January 2026	REA engaged the Vice Chancellor, Deputy Vice Chancellor, Registrar, Director of Physical Planning and other university representatives. The university confirmed ownership of about 604 ha of land acquired from the State Government, with compensation reportedly paid. Three 10 ha land options were proposed. Site 1 was flat, fallow and free from farming or structures. Sites 2 and 3 were farther from active campus areas and had lower security visibility.	ESIA required. Further screening of land options, with attention to access, security visibility, land documentation and long-term asset protection.
4	Federal University of Health Sciences, Otukpo, Benue State	29 January 2026	REA engaged the Director of Physical Planning, Vice Chancellor and university management. The university confirmed ownership of over 600 ha of land acquired from the State Government, with compensation reportedly paid. Limited physical infrastructure and no academic activity were observed at the permanent site at the time of visit. Farming activities were observed on parts of the land, reportedly by staff and some community members. Three 10 ha land options were indicated, but detailed documentation was still pending.	ESIA is required. Further engagement, land-use verification, documentation review and screening of staff/community farming activities before final site selection.
5	Admiralty University of	February	The university proposed two land	ESIA required. Institution

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
	Nigeria, Ibusa, Delta State	2026	options, both less than 10 ha. No farming activity or encumbrance was observed at the time of visit. The institution had a good number of physical infrastructures and academic activities were ongoing.	showed strong readiness. Final site screening and confirmation of land documentation required.
6	Federal University of Medicine and Medical Sciences, Kwale, Delta State	February 2026	The university proposed about 10 ha of fallow land with trees and shrubs. No farming activity or encumbrance was observed. However, only one physical structure was present at the permanent site, with no academic activity ongoing and limited institutional readiness.	ESIA required. Further confirmation of institutional readiness and implementation suitability required.
7	Federal University of Agriculture, Bassam-Biri, Bayelsa State	February 2026	The university proposed about 15 ha of fallow land with trees and shrubs. No physical structure was observed at the permanent site, while principal staff reportedly operated from Yenagoa.	ESIA required. Further readiness assessment required before implementation sequencing.
8	Federal University, Otuoke, Bayelsa State	February 2026	Preliminary engagement and site visit were undertaken as part of the DtP pre-feasibility assessment.	ESIA required. The ESIA process has commenced and will provide the detailed site information, land documentation, E&S observations, stakeholder engagement outcomes and site-specific mitigation requirements for this location.
9	Federal University of Environment and Technology, Saakpewa/Koroma, Rivers State	February 2026	The university proposed about 10 ha of land at the permanent site, reported to be free from encumbrances. Physical infrastructure was developing and academic activities were ongoing.	ESIA required. Institution showed strong willingness and readiness. Further site-specific screening required.
10	Federal University of Technology, Ikot Abasi, Akwa Ibom State	February 2026	The university proposed about 10 ha of fallow land with some economic trees and shrubs. Some staff farming activities were	ESIA required. Further confirmation of land use, farming activities, readiness and academic activity status

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
			observed, with crops reportedly being harvested. Physical infrastructure and internal road development were observed, but the status of academic activity at the permanent site requires further confirmation.	required.
11	Federal University of Technology, Okeho, Oyo State	January – March 2026	The university proposed about 10 ha of fallow, slightly undulating land covered with trees and shrubs. No encumbrance was observed. The institution had no physical structure or academic activity at the main campus at the time of visit.	ESIA required. Further readiness assessment required before implementation.
12	Federal University of Medicine and Medical Sciences, Abeokuta, Ogun State	January – March 2026	More than 10 ha of fallow land was proposed. The land had vegetation and slight undulation, with no farming activity observed. Physical infrastructure development was ongoing, but academic activities were limited to the take-off site.	ESIA required. Further readiness review and site-specific screening required.
13	Tai Solarin University of Education, Ijebu-Ode, Ogun State	January – March 2026	About 12 ha of land was proposed. The land is currently used as a student demonstration farm, with some palm trees. The institution has physical infrastructure and academic activities ongoing.	ESIA required. Further land-use assessment, consultation and submission of land documentation required.
14	Federal University of Technology and Environmental Science, Iyin-Ekiti, Ekiti State	January – March 2026	About 10 ha of land was proposed at the permanent site. Few farming activities were observed, reportedly by staff. Few physical structures were present and no academic activity was ongoing at the permanent site.	ESIA required. Further engagement, land-use verification and readiness assessment required.
15	Federal University of Health Sciences, Ila-Orangun, Osun State	January – May 2026	About 10 ha of fallow land was proposed at the permanent site, with economic trees such as palm, banana and mango, and shrubs. The university had physical infrastructure, internal road	ESIA required. Strong institutional readiness. Stakeholder concerns from FGDs to be reflected in ESMP/ESIA and contractor

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
			development and academic activities ongoing. Further FGDs were later conducted with staff, students and community leaders between 28 April and 6 May 2026.	requirements.
16	Federal University of Agriculture and Development Studies, Osogbo, Osun State	January – March 2026	About 10 ha of fallow and slightly undulating land was proposed. Staff farming activities were observed. Few physical infrastructures were available, and no academic activity was ongoing at the time of visit.	ESIA required. Further land-use verification, consultation and readiness assessment required.
17	Federal University of Education, Zaria, Kaduna State	January – March 2026	Four land options were proposed, ranging from 750 sqm to 2.5 ha. No encumbrance was observed. The institution is built up with diverse physical infrastructure and demonstrated strong readiness.	ESIA/ESMP required. Land documentation was provided. Further site-specific screening required.
18	Air Force Institute of Technology, Kaduna State	January – March 2026	About 10 ha of land was proposed. The land was slightly undulating and partly covered with trees and shrubs. No encumbrance was observed. The institution is well developed with physical infrastructure.	ESIA required. Land documentation was provided. Further site-specific screening required.
19	Federal University, Birnin-Kebbi, Kebbi State	January – March 2026	About 15 ha was proposed across three locations at the permanent site. The land was flat and partly covered with trees and shrubs, with no observed encumbrance. The university had several physical infrastructures and demonstrated strong readiness.	ESIA required. Land documentation was provided. Further site-specific screening required.
20	Federal University of Agriculture, Mubi, Adamawa State	January – March 2026	Three different 10 ha land parcels were proposed at the permanent site. The preferred land was flat, fallow, with few economic trees and shrubs, and free from encumbrance. Physical infrastructure and academic activities were present at the main	ESIA required. Land documentation was provided. Further site-specific screening required.

S/N	University / Location	Date / Period	Summary of Engagement and Key Findings	E&S Instrument / Follow-up Requirement
			campus.	
21	Federal University of Health Sciences, Azare, Bauchi State	January – March 2026	Two different 10 ha land parcels were proposed. The preferred site was slightly undulating, fallow, with few economic trees and shrubs, and free from encumbrance. The institution had physical infrastructure, although academic activity at the main campus was still limited.	ESIA required. Land documentation was provided. Further readiness confirmation and site-specific screening required.

Summary of Focus Group Discussions at Federal University of Health Sciences, Ila-Orangun, Osun State

As part of the ESMP/ESIA preparation process for the proposed beyond 1MW solar hybrid power project at the Federal University of Health Sciences, Ila-Orangun, Osun State, Focus Group Discussions and stakeholder consultations were conducted between 28 April and 6 May 2026. The consultations were conducted in Yoruba and English and involved academic and non-academic staff, male students, female students, and Owa-in-Council/community leaders.

The consultations introduced the proposed project, explained the purpose of the environmental and social assessment, and obtained stakeholder feedback on likely project impacts and mitigation measures. Stakeholders raised concerns relating to noise and air pollution, traffic and accident risks, disruption of lectures and library activities, construction waste, restriction of access to work areas, worker conduct, SEA/SH and child protection risks, possible exposure of students to alcohol or substance abuse, employment opportunities, supply of construction materials, sustainability and maintenance of the solar hybrid system, and grievance channels.

Stakeholders were informed that these concerns would be reflected in the ESMP/ESIA and contractor requirements. REA will require the contractor to implement traffic management, road signage, speed control, safe material storage, waste management, site access control, worker identification, code of conduct, SEA/SH prevention measures, and grievance channels, including confidential GBV/SEA/SH-sensitive reporting pathways. Stakeholders expressed support for the project and willingness to cooperate with REA and project workers, subject to proper management of the concerns raised.

Key Environmental and Social Issues Identified

The university-level engagements identified the following key environmental and social issues for consideration during further project preparation and implementation:

- Need to confirm land ownership, land allocation records, Certificates of Occupancy, master plans, GPS coordinates, single line diagrams and land-use status for proposed sites.
- Need to prioritise land parcels that are free from encumbrance, farming activity, physical structures, community use or other land-related risks.
- Presence of staff farming, student demonstration farms, community farming or economic trees on some proposed lands, requiring further verification, consultation and possible RAP/aRAP preparation where impacts cannot be avoided.
- Need to assess drainage, seasonal streams, low-lying or swampy areas, topography, access, technical suitability and security conditions before final site selection.
- Need to confirm institutional readiness, especially where permanent sites have limited physical infrastructure or no ongoing academic activities.
- Need to avoid duplication with existing REA-supported energy projects, as observed at Federal University of Education, Kano.
- Need to manage construction-related risks, including noise, dust, traffic, accident risks, construction waste, worker conduct, SEA/SH, child protection, alcohol/substance abuse risks and campus disruption.
- Need to disclose and operationalise grievance channels, including confidential GBV/SEA/SH-sensitive reporting pathways, before mobilisation.

Summary of Follow-up Actions

S/N	Follow-up Action	Responsible Institution / Person	Timing
1	Obtain and review all pending land documentation, including Certificates of Occupancy, master plans, GPS coordinates, single line diagrams and land-use status letters.	REA PMU, University Management, Physical Planning Units	Before final site selection
2	Conduct site-specific environmental and social screening for all proposed land options.	REA PMU, E&S team, technical team	Before detailed design and mobilisation
3	Verify staff farming, community farming, student demonstration farms, economic trees, seasonal land use or other livelihood-related activities on proposed lands.	REA PMU, University Management, E&S team	Before final site selection
4	Avoid sites with significant farming, drainage constraints, swampy conditions, poor access, security concerns or other avoidable E&S risks where suitable alternatives exist.	REA PMU, technical team, E&S team, University Management	During final site selection

S/N	Follow-up Action	Responsible Institution / Person	Timing
5	Confirm whether RAP or aRAP is required for sites where land-use or livelihood impacts cannot be avoided.	REA PMU, E&S team, E&S consultants	Before implementation
6	Confirm institutional readiness and implementation sequencing for universities with limited infrastructure or no active academic operations at permanent sites.	REA PMU, University Management, technical team	During project prioritisation
7	Require contractors to implement traffic management, site access control, safe waste handling, worker code of conduct, SEA/SH prevention, community health and safety measures and grievance disclosure.	REA PMU, contractor, E&S team, University Management	Before and during construction

Photo Logs of Consultations

Focus Group Discussion and Photo Session with Cross-Section of Students of the Federal University of Health Sciences Ila Oragun, Osun State

Focus Group Discussion (FGD) Session with Staff (Academic & Non-Academic) of the Federal University of Health Sciences Ila Oragun, Osun State

Photo Session with some Management Staff of the Federal University of Agriculture & Technology, Okeho, Oyo State Headed by the Vice Chancellor -Prof. O. J. Babayemi (In White Face Cap), the Registrar Mr. M.O. Amuni

FEDERAL MINISTRY OF ENVIRONMENT

ENVIRONMENT ASSESSMENT DEPARTMENT

EIA SITE VERIFICATION EXERCISE ATTENDANCE

PROJECT PROPONENT: RURAL ELECTRIFICATION AGENCY (REA)

PROJECT TITLE: SOLAR POWERED RENEWABLE ENERGY SOLUTIONS

PROJECT LOCATION: FEDERAL UNIVERSITY OF HEALTH SCIENCES, KWALE, DELTA STATE.

DATE: 03=02=2026

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FEDERAL MINISTRY OF ENVIRONMENT

ENVIRONMENTAL ASSESSMENT DEPARTMENT

EIA SITE VERIFICATION EXERCISE ATTENDANCE

PROJECT PROPONENT: RURAL ELECTRIFICATION AGENCY [REA]

PROJECT TITLE: SOLAR POWERED RENEWABLE ENERGY SOLUTIONS

PROJECT LOCATION: FEDERAL UNIVERSITY OF AGRICULTURE, BASSAMBIRI, BAYELSA STATE

DATE: 05=02=2026

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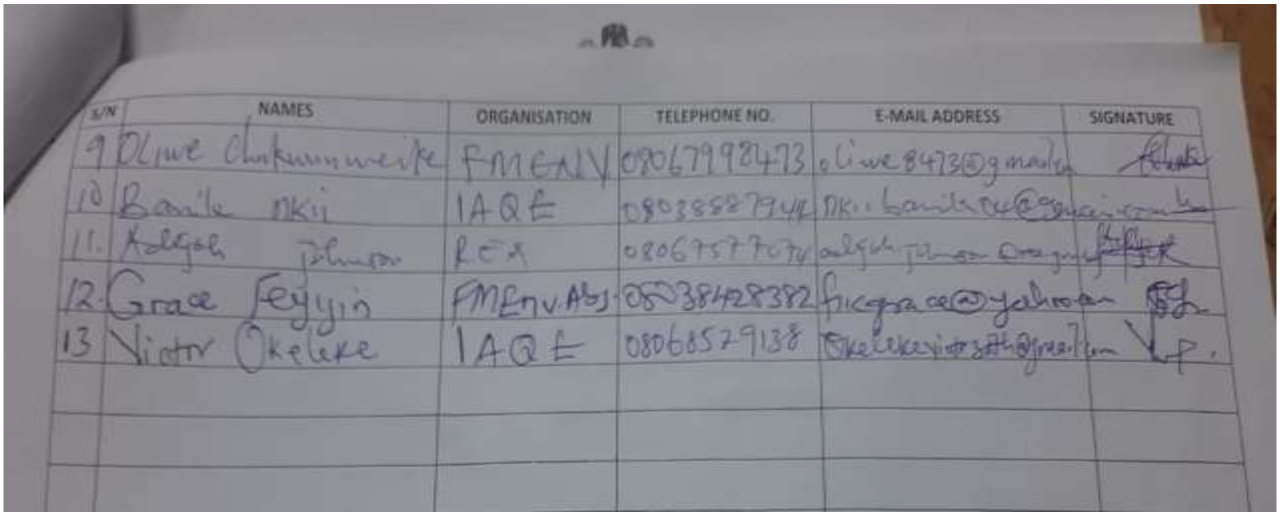

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13	Victor Okeleke	IAQE	08068579138	okelekevictor[illegible]@gmail.com	V.P.

Meeting with FUHSA Vice Chancellor and Director of Facilities

Consultation with University Management - FUT Babura Jigawa State

Consultation with University Management - FUBK Kebbi State