Federal Ministry of Communication, Innovation and Digital Economy (FMCIDE)

Building Resilient Digital Infrastructure for Growth (BRIDGE)
(P508383)

Draft Stakeholder Engagement Plan (SEP)

June, 2025

ACRONYMS

BRIGDE	Building Resilient Digital Infrastructure for Growth
CBO	Community Based Organization
CLO	Community Liaison Officer
CSO	Civil Society Organization
EA	Environmental Assessment
E&S	Environment and Social
ES	Environmental Standards
ESCP	Environmental and Social Commitment Plan
ESS	Environmental and Social Standards
ESF	World Bank Environmental and Social Framework
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FGN	Federal Government of Nigeria
FMoFBNP	Federal Ministry of Finance, Budget and National Planning
FMOEnv	Federal Ministry of Environment
FMCIDE	Federal Ministry of Communication and Digital Economy
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
KPI	Key Performance Indicator
LGA	Local Government Area
MDA	Ministries, Departments and Agencies
PDO	Project Development Objective

PIU	Project Implementing Unit
PWD	People Living with Disabilities
NCC	Nigeria Communications Commission
NGO	Non-Governmental Organization
PAPs	Project Affected Persons
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
WB	World Bank

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1.0   Project Description

1.1   Country Context

Nigeria, Africa's most populous country and home to the second-largest population living below US$2.15 per day, possesses substantial untapped economic potential yet is one of the least developed nations globally. It is among the largest economies in Africa, with a gross domestic product (GDP) of approximately US$363 billion in 2023, but over 40 percent of its population live in poverty.[1] Economic growth over the past decade has not maintained pace with population growth: income per capita in 2023 was US$1,621, lower than US$2,280 recorded in 2010. Nigeria's key development constraints include the high dependence on oil, insufficient economic diversification and inclusive growth, and a poor scorecard on governance and service delivery including investments in human capital.[2] However, by fostering better governance, empowering young entrepreneurs, and leveraging technologies, Nigeria can unlock the potential of digital economy to drive inclusive growth and diversify its economic base.

1.2   Sectoral and Institutional Context

Nigeria is confronted with significant challenges related to broadband access. National fixed broadband household penetration stood at 7.3 percent in Q3 2024, which is 26 percentage points below Senegal (leading regionally) and 10 percentage points below the level observed in countries with a similar GDP per capita. In relation to mobile internet, unique subscriptions per 100 inhabitants are also low, at 66.8 percent.

Private internet service operators are more active in urban areas than in rural areas; however, they are willing to scale up investments if major broadband infrastructure gaps and deficits are addressed. While eight international submarine cables land in Nigeria with over 350 Tbps of capacity, less than 10 percent of this capacity is utilized. The lack of backbone and backhaul connectivity outside the Lagos metropolitan area is cited by operators as a major bottleneck. Specifically, Federal Ministry of Communication and Digital Economy (FMCIDE) estimates that Nigeria needs approximately 120,000 km of fiber to achieve its strategic objectives outlined above. At present, there are only 30,000 km of fiber that have been laid. The FGN aims to deploy the remaining 90,000 km gap through the proposed BRIDGE project. With rural population density more than 40 times lower than in urban areas, last-mile network construction costs per subscriber are significantly higher in rural areas, leading to a lack of commercial viability and market failure. There is no commercial incentive for the private sector to bridge the backbone and backhaul connectivity gap in rural areas alone.

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1 World Bank (2022) A Better Future for All Nigerians: Nigeria Poverty Assessment 2022. Washington, DC. World Bank. https://openknowledge.worldbank.org/handle/10986/37295
2 World Bank Systematic Country Diagnostic 2020. https://elibrary.worldbank.org/doi/epdf/10.1596/33347

1.3 Project Description

The Building Resilient Digital Infrastructure for Growth (BRIDGE) project mobilizes catalytic finance to expand Nigeria's backbone and middle-mile broadband infrastructure. By supporting the deployment of broadband infrastructure, the project enables greater internet use by un- and underserved populations. The project will also help drive inclusive development through targeted efforts to ensure women's equal access to broadband internet.

1.3.1 Project Development Objective

The Project Development Objective (PDO) is *to expand inclusive use of high quality and climate resilient broadband internet in selected unserved and underserved areas of Nigeria.*

PDO Level Indicators

The achievement of the PDO will be measured by the following results indicators:

a. People using broadband internet (inferred use) (corporate scorecard indicator):

   i. Of which female

   ii. Of which youth

Intermediate Indicators

a. Private capital mobilized for deploying fiberoptic backbone networks in SPV (USD)
b. Special Purpose Vehicle for fiberoptic infrastructure operational (Yes / No)

c. Facilities connected to broadband internet (number); of which

   i. public schools

   ii. health facilities

   iii. local government administration offices

d. Decrease in wholesale prices (USD)

e. Number of contracts established between the SPV and service off-takers (non-monetary PCE indicator)

f. Broadband median download speed (Mbps) for fixed (Source: Ookla public data)

g. Climate resilient fiber added in the national backbone (kilometers Total private capital mobilized (USD)

1.3.2 Project Components

Component 1: Resilient Digital Infrastructure (IDA: US$495 million; PCM: US$1.1 billion): This component aims to finance the rollout of high-quality resilient backbone and backhaul digital infrastructure[3] in unserved and underserved regions of Nigeria, that allows private sector to then connect households, public institutions, businesses, and mobile towers to broadband. The component will seek to leverage catalytic public funding to mobilize private capital for infrastructure investments towards deploying such climate-resilient and low-carbon infrastructure. Specifically, the public funding will provide an input

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[3] A backbone network is connecting bigger cities together and routing data to the service centers; backhaul is Bringing Internet to a point in a community for broader distribution, see Annex C.

towards an established Project Company to be set up by the FGN. The Project Company will take the form of a Special Purpose Vehicle (SPV) that will crowd-in private sector participation. The SPV will be responsible for implementing the rollout of 90,000 km of fiber infrastructure. Downstream telecommunications companies will then in turn invest in construction of last-mile networks expanding their subscribers base and expanding network coverage

Component 2: Project Management and Implementation Support (IDA: US$5 million) will finance support to the Borrower's Project Implementation Unit (PIU). The PIU will be responsible for project management and implementation of project-related activities, including procurement, financial management (FM), monitoring and evaluation (M&E), project communications, as well as environmental and social safeguards and citizen engagement.

Components	IDA, Allocated Financing (US$ million)	Unguaranteed Commercial Financing (US$ million)	Total Financing (US$ million)
Component 1	495	1,100	1,595
Component 2	5	0	5
TOTAL	500	1,100	1,600

Table 1: Project Components and Tentative Cost Allocations

1.4   Rationale for this Stakeholder Engagement Plan

The BRIDGE project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

1.5   Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project. The core objectives of the SEP are as follows:

1. To establish a systematic approach to stakeholder's engagement during stakeholders' identification and build and maintain a constructive relationship with them.
2. Assess the level of stakeholder interest and support for the project and enable stakeholders' views to be considered in project design and E&S performance.
3. Ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
4. Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the beneficiary institutions to respond to and manage grievances.

2.0 Stakeholder identification and analysis

2.1 Methodology

The technical approach for the identification of project stakeholders is summarized as follows.

i.   Desk review of relevant documents related to the BRIDGE Project: The main documents reviewed include the draft Project Concept Note (PCN), Project Appraisal Document, and existing SEPs for recent bank projects.

ii. Consultations with beneficiary institutions to develop project activities and results framework

iii. Consultations with development partners, ministries, department and agencies (MDAs) and Mobile Network Operators & Internet Service Providers.

2.2. Affected parties

Affected Parties include local communities, community members and other parties that may be subject to direct **_positive and negative_** impacts from the Project. Specifically, the following individuals and groups fall within this category

The following groups were identified as affected stakeholders due to the Project:

Groups of Affected Parties	Description of Affected Parties	Issues of Interest or Concern	Project Stage
Right-Of-Way occupants, property owners, businesses to be displaced in the ROW	Land users and non-titleholders such as street-vendors along the right of way (RoW)	Properties or incomes may be temporarily impacted due to trenching activities for laying down fibre optic cable	Planning, implementation, and operation
Project Workers	Staff of the project company (SPV) to be established under the BRIDGE project Employees of contractors and consultants who will be engaged to lay the fibreoptic cables and other broadband network infrastructure.	Occupational health concerns and other working conditions such as work hours, salaries and wages unionisation and opportunities for escalating work-related complaints.	Planning, implementation, and operation
Host Communities	Broadband infrastructure will transverse several communities across the 36 states of Nigeria and the FCT.	Community members may be affected by temporary inconveniences by construction works while carrying out installation of fibre optic cables and other linear infrastructure. Tangible and intangible culturally sensitive sites under the custodianship of traditional authorities may	Planning, implementation, and operation

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| | | also be affected by Broadband Infrastructure works.

Community members along the broadband network route will have access to employment opportunities and other economic and livelihood transactions. | |
|---|---|---|---|
| Mobile Network Operators & Internet Service Providers | Leading and emerging telecommunications companies who will retail broadband internet services across Nigeria | These companies will leverage the backbone and backhaul infrastructure to deliver broadband services to more markets and hence improve profitability of their businesses. | Planning, implementation, and operation |
| Public schools, health facilities and local government areas (LGA) offices (connected to broadband internet) | Schools, Hospitals, health facilities and LGA offices. | Interest in High-Speed, High-Quality Wi-Fi | Planning, implementation, and operation |
| Women and youth (using broadband internet) including People Living with Disabilities (PWD) | Women, girls, persons with disabilities (PWD) | Interest in High Speed, High Quality Wi-Fi, but could be concerned about labour influx, lack of consultation, etc. | Planning, implementation, and operation |
| Broadband Internet Service Users | General Public, Consumer Advocacy groups in Telecoms sector | Access to affordable services, Minimal service disruption, Avoidance of harmful impacts attributable to facilities used in delivery of services. | Planning. Implementation and Operations |

Table 2: Identified stakeholder groups under BRIDGE Project

2.3. Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including:

1. **Federal Government Ministries, Departments & Agencies:** These are agencies across several sectors who have the following stakes
   o Regulatory oversight for Broadband Internet technology and markets – FMCIDE, Nigeria Communications Commission (NCC).
   o Environmental and Social Risk Management issues – Federal Ministry of Works, Federal Ministry of Environment (FMOEnv), Federal Ministry of Labour, Federal Ministry of Women Affairs, National Orientation Agency, SERVICOM
   o Consumption of Broadband Internet within different sectors - Education, Health, Electricity, Finance, Planning, and Youth Affairs.

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2. **Subnational Government Ministries, Departments & Agencies:** BRIDGE will be implemented at the Federal level of Government in Nigeria. However, the project activities will generate a lot of interest at sub-national level. The areas of interest at state level include
   o ROW use fees charged by states on broadband internet companies: State Ministries of Physical Planning, State Ministries of Works & Transport
   o Expansion of broadband internet services for both government and general public use: State Departments or Bureau of Information & Communication Technology
   o Management of Environmental and Social risks *(including but not limited to movable and immovable properties during Right-of-Way Acquisition)*: State Ministries of Physical Planning, State Ministries of Works & Transport, State Environmental Protection Agencies (SEPAs), State Ministries of Environment.

3. **Security Agencies:** Due to the emerging and re-emerging conflicts in various parts on Nigeria, security agencies like the Nigerian Police, Nigeria security and Civil Defense Corps, Regional Security Outfits (Amotekun, Ebube Agwu) will be needed to mobilize protection services for the operations of all entities involved in the implementation of BRIDGE including but not limited to the PIU at FMCIDE and the SPV. These institutions are mandatorily and statutorily tasked with securing lives and property hence the project will leverage on their availability particularly in security-sensitive locations.

4. **Other Financing Institutions:** The BRIDGE project has an unguaranteed Commercial Financing Gap of USD 1.1 billion expected to be sourced from various markets from the private sector. The operators of commercial funds are therefore interested parties in the operation as they can explore the business lines made available. At the time of developing this SEP, a few market sounding events have been conducted but no firm commitments have been made, hence a list of specific finance market operators will be drawn up during the implementation of BRIDGE.

5. **Informal or traditional community institutions**: These include leaders of entities such as host communities, community groups and associations, religious bodies, women self-help groups/women affinity groups, youth groups, etc.

6. **Formal Civil Society Organizations:** Non-Governmental Organizations (NGOs) and Community Based Organization (CBOs) working in the project areas. The Partnership for Amplified Voices (PAV) is a veritable platform to identify and engage these organizations. PAV is dialogue platform in Nigeria portfolio between CSOs and the World Bank with respect to projects and programmes financed by the WB. The platform is a coalition of leading CSOs in Nigeria that collaborates to work diverse thematic areas and mobilizes efforts in all the states with uniformity and alignment of purpose. It influences an increase in community participation by helping create, across project areas, sustainable platforms for citizen engagement to mobilize interests and leads advocacies for community buy-in for the project. Additionally, PAV helps improve outcomes in monitoring projects through CSO networks that have eyes and ears in sub-national communities.

7. **Broadband Internet Consumers:** All users of broadband services on account of improvements in affordability and reliability. The Nigeria Communication Commission (NCC) convenes a Telecoms Consumer Parliament, a platform for consumer education and protection, where consumer voices can be heard.

8. **Mass media groups and academia:** The media in Nigeria is constitutionally recognized to report of government activities across Nigeria. These include several print, traditional broadcast and digital (or new) media platforms which are active across the country.

2.4. Disadvantaged / vulnerable individuals or groups

Within the Project, the vulnerable or disadvantaged groups include persons with the following characteristics.

1. *Elderly people (60 years and above);*
2. *Persons with disabilities and their caretakers.*
3. *Women-headed households.*
4. *The unemployed and underemployed.*
5. *Child-Headed Household:*

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in section 3.

3. Stakeholder Engagement Program
3.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were held as mentioned below:

Event	Date	Venue	Participants	Summary of Concerns Raised	Response
Stakeholder Alignment on Environmental and Social Framework for BRIDGE	16 May 2025	Virtual – Microsoft Team	FMCIDE PMO Team, AfDB, World Bank, European Bank for Reconstruction and Development - EBRD	The primary objective of the meeting was to ensure coherence between the environmental and social policies, instruments, and approaches of the World Bank, AfDB & EBRD. The teams discussed the need to avoid duplicative efforts and streamline documentation and compliance processes. AfDB led the discussion on their framework and emphasized the importance of access to detailed project information, the terms of reference for the feasibility study, and alignment on environmental and social due diligence. The World Bank team presented their existing and planned ESF instruments. They also noted that a quality review process is ongoing and confirmed that many of these documents would be publicly disclosed. The discussion also touched on the sequencing of project preparation, feasibility outputs, and the development of safeguards instruments. The meeting concluded with a clear commitment to continue collaboration, maintain open channels of communication, and coordinate more closely in the coming weeks.	- **Centralize documentation** – Set up a shared document folder for all ESF instruments and project ToRs. - **Align timelines** – Develop a shared milestone tracker with AfDB, World Bank, and PIU to manage deliverables leading to government deadlines. - **Clarify E&S staffing needs** – Finalize and circulate ToR for E&S specialist; begin recruitment or secondment process.
World Bank Digital Transformation (DT) Vice President's (VP's) Private Sector Roundtable - Broadband Access, Affordability &	28-Feb-25	WB, Abuja Room	21st Century, 9 Mobile, Airtel, BCN, Equinix, Globacom, IPnX, MTN, Phase 3 Telecom, Tizeti, West Indian Ocean Cable Company (WIOCC).	Priority actions to: (i) close Nigeria's digital infrastructure and data infrastructure gap through greater private sector investment and participation in the digital/ ICT sector; (ii) find strategies to improve digital skills and productivity to close the gaps and increase digital jobs; and (iii) increase	Stakeholders agreed on the shared vision for the project, as a government backed SPV, to be led by the private sector as guaranteed model to build fibre infrastructure that can provide affordability and quality A shared sense of the broad objectives, to ensure broadband

				penetration and use of digitally enabled services, including digital ID, financial services, etc.	to low and non-consumption clusters, and ideas on models to facilitate affordability.
Quality					
Fibre Forward: FINANCING OF 90,000KM FIBRE OPTIC BACKBONE INFRASTRUCTURE ACROSS NIGERIA	25-Jun-24	Fraser Suites	FMCIDE, African Development bank (AFDB), World Bank (WB), European Union (EU), Open Access Data Centres, United States Trade and Development Agency (USTDA), Phase 3, Nigeria Sovereign Investment Authority (NSIA), WIOCC, Ministry of Finance Incorporated (MOFI), Nigeria Communications Commission (NCC), International Finance Corporation (IFC), Islamic Development Bank (IsDB), Oodua Infraco, Modular open Source Identity Platform (MOSIP), State House, Federal Ministry of Finance (FMoF), Africa Finance Corporation (AFC),	During various events focused on broadband infrastructure in Nigeria, including the Fibre Forward event on June 25, 2024, the Broadband For All Workshop on February 13, 2024, and the Country Private Sector Diagnostic (CPSD) consultations in May 2024, several concerns were consistently raised. Participants highlighted excessive right of way (ROW) fees and opaque processes for obtaining ROW approvals as significant barriers to the deployment of fiber optic infrastructure. The high cost of broadband services and underdeveloped national fixed-line infrastructure were also identified as major challenges. Vandalism of fiber optic installations was a recurring issue, leading to increased maintenance costs and service disruptions. Stakeholders emphasized the need for better coordination and transparency among government agencies, enhanced security measures, and community engagement to protect infrastructure. Additionally, providing fiscal and monetary incentives to attract private sector investment was recommended to reduce the financial burden on investors and facilitate infrastructure deployment. Overall, these events underscored the necessity for coordinated efforts to address	FMCIDE presented plans and traction to achieve affordable or zero-rated ROW cost and provided updates of engagements with State Governments in Nigeria, with at least ten states negotiating zero rated cost.

Updates were also presented on the Implementation of Critical National Infrastructure (CNI) Order which was issued prior to the session. The implication and enforcement of CNI will improve security of Infrastructure and provide a platform for coordination. The CNI order will institutionalize security, information sharing and surveillance of telecoms infrastructure as a National Priority.

It was also agreed that the proposed structure of the project as a PPP will guarantee affordability and affordability for stakeholders. |
| Country Private Sector Diagnostic (CPSD) Consultation | 9-May-24 | Transcorp Hilton | NCC, FMCIDE, Galaxy Backbone (GBB), National Data Protection Commission (NDPC), National Information Technology Development Agency (NITDA), Office of National Security Advisor (ONSA), State House/The Presidency | | Private sector agreed that backbone and backhaul infrastructure is patchy and not sufficient to support last mile investment

2There is no business case to invest into last mile and to extend backbone either without Government's support |

Country Private Sector Diagnostic (CPSD) Consultation	May 6 - 8, 2024 and May 10, 2024 (Virtual)	IFC Office, Lagos	American Tower Company, Association of Telecommunications Companies of Nigeria (ATCON), Backbone Connectivity Network (BCN), iHS, INQ Digital, Main One, Ericsson, Suburban Telecommunication, Cisco, IPNX, Merit Telecommunications, Microsoft, Raenna, VDT Communications, Medallion, Liquid Tech	ROW limitations, reduce fees, improve transparency, and enhance security measures to encourage private sector investment in broadband deployment across Nigeria.	
Broadband For All Workshop – Realizing a Nigerian Vision of Broadband for All	13-Feb-24	Transcorp Hilton	NITDA, NCC, MainOne, ITX Telecoms, Central Bank of Nigeria (CBN), Ericsson, IHS, NAPET, Phase 3 Telecom, Global System for Mobile Communications Association (GSMA), Nigeria Communications Satellite (NIGCOMSAT), NITDA, American Tower Corporation (ATC), FMCIDE, BCN, Paradigm Initiative, Johnson and Wilmer, AFDB, Oodua Infraco, Merit, Nigerian Television Authority (NTA), Google, 21st Century, Suburban, Hamu Legal		Stakeholders agreed on the need to catalyze investments and broadband access to support National development. The session also addressed models to address non-consumption such as subsidies and bulk purchases to improve access. Stakeholders also aligned on infrastructure sharing models to enable optimization and reduce duplicity in developing infrastructure.
Stakeholder Consultation Form and Outreach	22nd April 2025	Online	20 local and international Finance Houses, DFI's, Telecommunication Companies	Need for guarantees/comfort mechanisms	Will be considered in SPV structuring phase
Stakeholder focused meetings	14-16 April 2025	Hybrid-Online and Physical	Finance Houses, DFI's, Telecommunication Companies	Models for the SPV's Operational Model Stimulation of Demand The need for a single, consolidated feasibility study to underpin technical, financial, and	A hybrid model combining both expansion and competitive market strengthening will be deployed Implementation of initiatives to boost device access and digital adoption

				regulatory structuring. Alignment on the strategic relevance Geographic scope	Efforts are being aligned to use a single feasibility plan that is acceptable to partners Engagement and stakeholder feedback is vital in shaping the project and outcomes The approach will be balanced and blended to ensure expansion into underserved areas and commercially active regions
Workshop on Structural Options to Accelerate Fiber Deployment in Nigeria	15-16 June 2022	Physical Transcorp Hilton Hotel Abuja	123 people: World Bank, FMCIDE, BCN, NITDA, IHS Towers, NCC, Broadband Implementation Steering Committee (BISC), Federal Competition and Consumer Protection Commission (FCCPC), Galaxy Backbone (GBB), Federal Ministry of Transportation (FMOT), WIOCC, MTN Nigeria, Airtel, Phase 3 Telecom, Nigeria Police Force (NPF), Glo, Globacom, Alliance for Affordable Internet (A4AI), Jos Electricity Distribution (JED Plc), Universal Service Provision Fund (USPF), MainOne, Meta, ATCON, ALTON, Space X, Academia in IT Profession (AITP), 9mobile, Hamu Legal, ONSA, Ministry of Petroleum Resource (MPR), United Nations World Food Programme (UNWFP), IFC, United Nations High Commissioner for Refugees (UNHCR), Transmission Company of Nigeria (TCN), Medallion	Way forward for expanding fiber networks in Nigeria. World Bank presented options to expand wholesale fiber networks in Nigeria including a SPV model (for consolidating various assets and rights of ways). The workshop discussed example business and deployment models in other countries, SPV ownership options, legal and regulatory aspects, etc.	Workshop was well received by various stakeholders.

			Data Centre, Eko Electricity Company, Federal Ministry of Works and Housing (FMWH), Ikeja Electric, Kaduna Electric, Yola Electricity Distribution Company (YEDC), Afrinvest, Federal Ministry of Budget and Economic Planning (FMFBNP), INQ Digital Nigeria		

Disclosure of Environmental and Social Reports and Plans

The environmental and social reports and plans will be disclosed through the Federal Ministry of Environment's website and other relevant websites such as the FMCIDE. Feedback received during consultations was focused on the need for guarantees/ comfort mechanisms and was considered by FMCIDE.

In case new stakeholders are identified in addition to those already mentioned in this section, they will be incorporated and considered in the next disclosure and consultation processes. It should be noted that the entire process will be documented, at least, through the list of attendees and photographic records of the activities. In addition, all the information incorporated in the SEP will be presented in updated versions of this SEP.

3.2. Summary of project stakeholder needs and methods, for stakeholder engagement

Different engagement methods are proposed to cover different needs of the stakeholders as stated below. Meetings will be held in in different formats including physical, virtual and hybrid[4] formats depending on the context of the audience involved in the engagement.

Organisational Level	Target stakeholders	Engagement Needs	Method of Engagement
Community Level	Project Community Leaders	- Overview of BRIDGE project - Right-of-Way of project - Information on project benefits and opportunities - Potential E&S impacts on various receptors – *community health, security, conflicts et. cetera* - Grievance Redress Procedures - Regular updates on Project development	- Notice board, - One-on-One interviews - Focus Group Meetings *Face-to-face meetings*
	Informal or traditional community institutions and Community-Based Organisations	- Overview of BRIDGE project - Right-of-Way of project - Information on project benefits and opportunities - Potential E&S impacts on various receptors - Grievance Redress Procedures - Protection of telecom infrastructure assets - Regular updates on Project development -	- Notice board, - Community Consultations - Town Hall Meetings - Focus Group Meetings
	ROW occupants, property owners, businesses to be displaced	- Selected routes for fibreoptic cables - Nature of displacement impacts along the route - Measures for managing displacement impacts - Grievance Redress Procedures - Regular updates on Project development	- Community Consultations - Focus Group Meetings - Telephone calls
	Women and youth (using broadband internet) including People Living with Disabilities	- Measures to avoid discrimination in access to project benefits and opportunities. - Affirmative action arrangements to promote participation of vulnerable groups in project design and implementation	- Notice board. - Face-to-face meetings at community level - Radio
	Local Educational and Health Institutions	Benefits of broadband internet technology and the BRIDGE project.	- Mail. - Telephone calls - Face-to-face meetings.

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[4] Physical meetings are the preferred meeting option in locations where virtual meeting formats cannot be deployed or where participants cannot use such technologies effectively. This will be the case in community-level meetings held in rural areas. Available technology will be leveraged to engage formal sector stakeholders who have access to such technologies. A hybrid meeting arrangement will also be deployed where the project will enhance physical meetings with virtual meeting access to allow persons who are not able to attend but are willing to join virtually. Such hybrid formats will allow the project team to expand its coverage of various stakeholder groups

			• Letters • Radio
Project Level (BRIDGE PIU and SPV)	Project Workers	• Occupational health risks and hazards • Available remedies for injuries and other occupational risks • Employee Grievance Redress Procedure;	• Focus Group Meetings • Workers' Dialogue
	Interested Bidders	• Opportunities for engagement to carry out civil works • E&S provisions in bidding documents	• Business Outreach Events • Surveys
Private Sector	Mobile Network Operators	• Opportunities for last-mile connectivity to broadband backbone	• Business Sounding Events • Focused Surveys
	Internet Service Providers	• Opportunities for last-mile connectivity to broadband backbone	• Business Sounding Events • Focused Surveys
	Finance & Investment Organisations	• Opportunities for equity investment in SPV when established	• Business Sounding Events • Focused Surveys
Federal Government Institutions	Regulatory Bodies – FMCIDE, Nigeria Communications Commission	• Policy and Operational compliance of project company (SPV) and related entities with regulatory standards related to technology deployment and business operations • Regular updates on Project development	• Formal meetings • Formal letters or memoranda • Email
	Environmental and Social Risk Management Mandate MDAs – Federal Ministry of Works, Federal Ministry of Environment, Federal Ministry of Labour, Women and Child Development, National Orientation Agency, SERVICOM	• Compliance with environmental and social regulatory standards • Monitoring of impact footprint on E&S receptors as attributable to project activities	• Consultation Meetings • Expert Panel Review Workshops • Formal letters or memoranda • Email • Website
	Other FGN MDAs in Education, Health, Electricity, Finance, Planning, and Youth Affairs.	• Interest in improving access for broadband internet services for underserved and unserved demographic groups or persons who might be financially excluded from accessing services.	• Formal meetings • Formal letters or Memoranda • Email • Telephone calls •
Subnational Government Ministries, Departments & Agencies	State ROW management bodies: *State Ministries of Physical Planning, State Ministries of Works & Transport*	• Enforcement of approved ROW to remove encroachers • Provision of information on ROW routes • Advise on alternative route in locations where approved ROW has been encroached or is congested	• Formal meetings • Formal letters or Memoranda • Email • Telephone calls
	Utilisation of Broadband internet services: *State Departments or Bureau of Information & Communication Technology*	• Interest in improving access for broadband internet services for underserved and unserved demographic groups or persons who might be financially excluded from accessing services.	• Formal meetings • Formal letters or Memoranda • Email • Telephone calls

	Management of Environmental and Social risks: *State Ministries of Physical Planning, State Ministries of Works & Transport, State Environmental Protection Agencies (SEPAs), State Ministries of Environment*	• Compliance with environmental and social regulatory standards • Monitoring of impact footprint on E&S receptors as attributable to project activities	• Consultation Meetings • Expert Panel Review Workshops • Formal letters • Email • Telephone calls
Other Financing Institutions	Multilateral Development Banks	• Additional Investment commitments • Use of common approach to manage E&S risks of the project	• Formal meetings • Email • Telephone calls
Formal Civil Society Organizations	1. Partnership for Amplified Voices (PAV) 2. Other CSOs and coalitions on Telecoms issues	• Representation of traditionally underserved demographic groups in the distribution of project benefits • Third-party monitoring of implementation of E&S commitments	• Town Hall Meetings • Focus Group Meetings • Email • Telephone calls
Vulnerable Persons	1. Elderly people (60 years and above); 2. Persons with disabilities and their caretakers. 3. Women-headed households. 4. The unemployed;	• Measures to avoid discrimination in access to project benefits and opportunities • Affirmative action arrangements to promote participation of vulnerable groups in project design and implementation	• Focus Group Meetings • One-on-One Interviews with Key Informants • Notice Board
Broadband Internet Consumers	Members of the public in unserved and underserved areas	• Benefits of broadband internet technology and the BRIDGE project.	• Town Hall Meetings (at regional and senatorial district levels) • NCC Telecoms Consumer Parliament sessions • Mail, • Telephone calls • Letters • Radio
Media Organisations	• TV stations • Radio Stations • Bloggers	• Project design and overview • Project Implementation Progress reports	Project Newsletter

3.3. Proposed strategy to incorporate the views of vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns/needs in terms of accessing information, project related job opportunities and services and other challenges they face at home, at workplaces and in their communities. Special attention will be paid to engagement with women. The details of strategies that will be adopted to effectively engage and communicate with vulnerable groups will be considered during project planning. At the minimum the plan will deploy the strategies listed below to ensure effective engagement of such groups.

1. Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation.
2. Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the Project including on potential adverse impacts.
3. Ensure communication methods are appropriate given communication challenges for such groups.
4. Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
5. Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions towards the Project activities and the associated impacts, especially the adverse ones.

3.4. Disclosure and Reporting back to stakeholders

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

Information disclosure to all potential stakeholders will rely on the following key methods: email, letters, face to face meetings, memos, website, radio broadcasting, community meetings in coordination with relevant authorities including local authorities (local government, traditional institutions), phone communication (SMS), and notices at the community level. Information will be disclosed in English or the respective local language, where appropriate. Local authorities, such as traditional authorities, religious leaders, and local government chairpersons will be requested to inform communities in community meetings and through disclosure at project locations.

In reporting back to project stakeholders, the project will also follow disclosure guidelines of the Federal Ministry of Environment in the case of Environmental and Social instruments (ESIA reports, ESMPs, RAPs etc). The guidelines require that documents are placed on public display for twenty-one working days through the disclosure channels listed earlier in this section.

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

The BRIDGE PIU E&S unit and SPV E&S Unit will be jointly responsible for stakeholder engagement activities. The budget for the SEP will be financed from component 2 of the project.

The budget for implementation of Stakeholder Engagement activities is shown in the table below:

SN	Budget categories	Quantity (no of people / activity)	Unit costs in Naira	UNIT (Daily, Monthly, annually etc)	Freq (no of times)	Total costs in Naira	Remarks
1	Estimated Staff salaries and related expenses						
1a.	*E&S consultant*	1	15,000,000	Annually	5	75,000,000	
1b	Communications Consultant	1	15,000,000	Annually	5	75,000,000	
1c	*Travel costs for staff*		30,000,000	Lump Sum	5	150,000,000	
1d	*Estimated salaries for Community Liaison Officers*	6	10,000,000	Annually	5	300,000,000	1 per geopolitical zone
2	Events						
2a	Town Hall Meetings (Virtual, Physical, Hybrid) at Project Preparation and Early Project Implementation Phase	42	2,000,000	One-Off	One-off	84,000,000	6 preparatory meetings per geopolitical zone. 36 meetings at state level before project kick-off
2b	Community Consultations	*Unknown*		Lump Sum		100,000,000	
3 Communication campaigns							
3a	Frequently Asked Questions (FAQs)	20,000	10	Lump Sum	1	200,000	
3b	Project Newsletters	1,000	1000	Lump Sum	20	20,000,000	Per quarter
3c	Project and SPV Website	2	5,000,000	Lump Sum	1	10,000,000	
4	Trainings						
4a	*Training on social/environmental issues for PIU and contractor staff from SPESSECEs (centres of excellence)*	20	500,000	One-Off	1	10,000,000	SPESSE courses are tuition-free for Public Sector however the project will bear costs for logistics for participation in the courses
4b	*Training on GBV for PIU and contractor staff*	10	500,000	One-Off	1	5,000,000	
5	Beneficiary surveys						
5a	Mid-project perception survey	1	15,000,000	One-Off	1	15,000,000	
5b	End-of-project satisfaction survey	1	15,000,000	One-Off	1	15,000,000	
6	Grievance Mechanism						
6a	*Training of GM committees*	6	5,000,000	One-Off	1	30,000,000	
6b.	*Suggestion boxes in*	*Unknown*	*Unknown*	*One-Off*	*Unknow*	5,000,000	

	villages				*n*		
6c	*GM communication materials*	20,000	10	One-Off	1	200,000	
6d	*SPV complaints mgt app*	1	15,000,000	Lump Sum	1	15,000,000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:						N 899,410,000	

4.2. Management functions and responsibilities

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function for BRIDGE are described. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the BRIDGE PIU, the SPV Management Team, works contractors and consultants.

The roles and responsibilities of the individuals and organizations are presented below

Role	Responsibility / Accountability
Project Coordinator *(BRIDGE PIU)*	• Ensure proper implementation and follow up of the SEP. • Ensure that relevant employees of participating agencies implementing BRIDGE activities are informed and trained on the SEP. • Ensure the BRIDGE E&S and Communications team reports on time and with the expected and agreed points. Provide Financial and Human resources to ensure that interests of stakeholders are represented and taken into consideration during implementation of activities. • Ensure oversight for the SEP implementation responsibilities of the SPV under BRIDGE.
Social Specialist (BRIDGE PIU)	Neutral individual who should be proven not to have a personal interest in a particular outcome. As the primary interface between the Project and stakeholders, the Social Specialist will: • Lead the SEP from the sponsor perspective and coordinate the results and actions to be taken with the BRIDGE PIU • Review the SEP suitability with the technical leads of all BRIDGE activities • Lead day-to-day implementation of the SEP and Grievance Mechanism, including proactively maintaining regular contact with affected parties through regular meetings to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups. • Produce stakeholder engagement monitoring reports and submit to Project Coordinator. • Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Project.
Communication Specialist (BRIDGE PIU)	• Mobilize the participation of BRIDGE PIU and key stakeholders in the design and implementation of a communication strategy • Work closely with the key stakeholders to roll out communication strategies • Operate all communication channels to ensure accurate and prompt dissemination of information to all stakeholders

	• Support sensitization and awareness creation sessions
<u>Social Risk Manager (SPV Management)</u>	• Lead in the management of all social risks associated with the operation of the SPV under the BRIDGE project • Ensure adherence to laws, regulations, rules, and procedures applicable to the project, including national and local requirements. • Ensure the SEP includes measures for effective participation of disadvantaged or vulnerable groups. • Engage and consult with stakeholders, including disadvantaged or vulnerable groups.
Civil Works Companies and Supervision Firms	• Ensure that employees and subcontractors and consultants have in their contracts a code of conduct and they are aware and trained on the SEP. • Coordinate required SEP support and trainings for staff
Contracted Workers	Comply with the requirements stated under the code of conduct. *Non-compliance will be treated as a disciplinary matter.* Provie assistance if needed to ensure compliance with this plan. Perform assigned tasks towards meeting SEP objectives. Communicate concerns, questions or views to their supervisor or the CLO compliance or implementation of the SEP. Provide data related to SEP performance/monitoring as required.

5. Grievance Mechanism

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved.

5.1. Description of GM

GM Element	Description of process	Timeframe	Responsibility
GM Management structure	*Tier 4:* FMCIDE Servicom Desk *Tier 3:* BRIDGE PIU Grievance Redress Committee (GRC) *Tier 2:* SPV Headquarters Complaints Desk *Tier 1:* SPV Project Community GRC. The CLO is the secretary of the GRC	NA	NA
Grievance uptake	Grievances can be submitted via the following channels • **Channel 1:** Verbal reports to Community Liason Officers stationed at Broadband Network route communities • **Channel 2:** Letter to complaint boxes placed in Broadband Network route communities • **Channel 3:** Toll-free telephone hotline / Short Message Service (SMS) line to SPV complaints desk • **Channel 4:** E-mail to SPV complaints desk • **Channel 5:** Complaint form filled on SPV website	NA	NA
Sorting, processing	Any complaint received from the five channels will be handled as follows; • **Channel 1:** Details of complaint and complainant will be logged on the complaints app by the CLO • **Channel 2:** Details of complaint and complainant will be logged on the complaints app by the CLO • **Channel 3:** Complaint received via SMS and toll-free line will be automatically registered on the complaints app. • **Channel 4:** Complaint received via email will be manually registered on the complaints app • **Channel 5:** Complaint received via web complaints form will be automatically registered on the complaints database and dashboard All complaints will be categorized according to the schedule shown in Annex 1 of this SEP. Where complaints are brought to the attention of staff of contractors or consultants, such complaints MUST	Upon receipt of complaint	• Channels 1 & 2: CLO • Channels 3, 4 & 5: SPV Complaints Desk Executive

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	be referred to the		
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by • the CLO (Channel 1 & 2) and • the SPV Complaints Desk Executive (Channel 3, 4 & 5)	Within 24 hours receipt	CLO & Complaints Desk Executive
Verification, investigation, action	• Investigation of the complaint related to specific communities and locations led by the CLO while those of a general nature are investigated by SPV Complaints Desk Executive. Where necessary, the CLO will support the SPV Complaints Desk Executive to investigate complaints • Depending on the location , a proposed resolution is formulated by CLO or the SPV Complaints Desk Executive • Communicated to the complainant by SPV Complaints Desk Executive Details of the resolution reached and agreed to are logged on the SPV complaints app	Within 10 working days	
Monitoring and evaluation	Data on complaints are collected in the project monthly reports by the Complaints Desk Executive of the SPV and reported to the E&S officer of the PIU	Monthly	SPV Complaints Desk Executive
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected [*insert*],	Within 72 hours of resolution of complaint	SPV Complaints Desk Executive
Training	Training needs for staff/consultants in the PIU, SPV Contractors and Supervision Consultants are 1. Grievance Screening & Sorting 2. Alternative Dispute Resolution (ADR) techniques 3. Grievance logging and tracking using SPV complaints App	Within 3 months of project effectiveness	PIU Project Coordinator

Appeals: The GM provides a 4-tier hierarchy to facilitate an appeal process in cases where complainants are not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

SEA/SH Complaints: Whenever they occur, the project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH.

A specialized Worker's GRM will be described in detail in the Labor Management Procedures which has been prepared for the BRIDGE project.

Resettlement Related Grievances: Typical grievances related to resettlement may include community or individual's dissatisfaction with: (a) the eligibility criteria, (b) the amount of compensation or assistance

measures; (c) unexpected and unaddressed resettlement impacts; and (d) implementation or timing of such measures. The overall process of grievance handling is as follows:

- Compensation committees including representatives of PAPs will establish the compensation rates.
- During the initial stages of the valuation process, the affected persons are given copies of grievance procedures as a guide
- Compensation will be paid to individual PAPs only after a written consent of the PAPs is received, including both husband and wife (and children where relevant). Should a PAP decline the compensation suggested, he/she will have the option to register grievances to the CLO .
- A Compensation Committee (CC) and the grievance committee at the district level will first review his/her case.

When these have failed to resolve the grievance, the individual PAP has the right to take his case to appeal the next level GRM (municipality/state level or federal levels, depending on the municipality) or the civil courts for litigation

6. Monitoring and Reporting

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

Domain	Indicator	Target	Methods/Sources of Information	Frequency of Data collection	Responsible entity
Demand created for GRM	Level of beneficiary awareness and demand	80% of project related grievances are referred to GRM5	- Grievance logs - FGDs in communities - Reports from community engagements - Reports from BRIDGE In-house evaluation	Quarterly	BRIDGE M&E officer PIU Social Specialist
Beneficiary Feedback process effectiveness	Identified stakeholders actively participating in engagement activities and using GRM	70% participation of Identified Stakeholders in project activities	- Beneficiary participation reports	Yearly	BRIDGE M&E officer
	No of community consultations	At least 109 community consultations were held			
	% of engaged individuals who are vulnerable	At least 50% of vulnerable persons are engaged			
GRM process effectiveness	% grievances resolved	80% of respondents claim that GRM is well understood, accessible 70% of grievances resolved	- Results from GRM user satisfaction survey by external consultant - Results from Independent survey and audit of Beneficiary Feedback performance and effectiveness by external consultant	Project mid-term review	External consultant

6.2. Involvement of stakeholders in monitoring activities

Adequate institutional arrangements, systems and resources will be put in place to monitor the implementation of the SEP. The main monitoring responsibilities will be with the PIU. This will be led by the PIU Social Specialist. The PIU Project Coordinator will be overall responsible for the implementation of the environmental and social mitigation measures, including the SEP, as well as for monitoring and inspections for compliance with the SEP.

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5 Grievances will be tracked through electronic logs generated on the complaints application set up by the SPV

The PIU will collect all reporting from the SPV, as well as its own findings, and produce an overall E&S progress report, which will contain a distinct section of stakeholder engagement, and which will be provided to the World Bank. The project will follow a quarterly reporting cycle. These quarterly reports will further be shared with all stakeholders, as defined in the SEP.

Further, during construction stage, the ESMF will provide that the contractors will prepare site specific Environment and Social Management Plans (C-ESMP) that will include customization of the Stakeholder engagement and Grievance Management. This provision will enable lowest level stakeholders to be involved in the Project and participate in the monthly Project implementation meetings

6.3. Reporting back to stakeholder groups

Results of stakeholder engagements will be regularly reported back to the stakeholders. It will be the responsibility of the PIU and the SPV Management (through all its operational offices) to ensure that all relevant reporting is shared through the above defined public means.

Methodology proposed	Date of Submission	Place of Submission	Stakeholders addressed
Community meeting to present the results report with parties concerned	During commencement of sub-project activity	Community level	All local level stakeholders
Publication of results report on the website	During commencement of project and throughout implementation	National level (PIU)	All national level stakeholders
Dissemination of results report by email	During commencement of project and throughout implementation	National level (PIU)	All national level stakeholders and local administration

The project's environmental and social management instruments will be published first in a draft version, and after consultations with stakeholders, the revised version will be published again. In addition, in each of the activity's stakeholders will be reminded that they have the GRM at their disposal and contact information will be provided.

The channels to receive feedback from interested parties on the reports presented include email responses, filing of feedback through GRM, direct personal responses during community level meetings.

Annex 1: POTENTIAL ISSUES AND COMPLAINTS BY PROJECT PHASE

	TYPES OF ISSUES	SPECIFIC COMPLAINTS
A	PREPARATORY PHASE	
1	Delayed/failed expectations	A Preparatory phase 6 months is envisaged- with potentials for delays
2	Exclusion claims	Non- inclusion of communities on the final broadband infrastructure route
		Non- inclusion in Preliminary consultations and stakeholder engagement (including safeguard instruments)
		Non- inclusion in selection of members of community GRC
		Lack of access to Tendering opportunities in the selection of works contractors
3	Physical and/or economic displacements	Forced eviction by project or community
		Surrender of land under coercion by community council
		Not satisfied with compensation
		Dispute over land
		Landlords not okay with compensations to tenants
		Government not okay with resettlement benefits to squatters
B	IMPLEMENTATION PHASE	
1	Security	Influx – job seekers influx increasing crime and molestation rates.
		Unauthorised access to construction sites
		Tampering with contractor's equipment and goods
		Threats to life and property by persons associated with the project (community member)
2	Conflict	Non-payment for goods and services
		Insensitive conduct around cultural norms and practices
3	Security personnel	Threats, intimidation and actual and abuse by security personnel
		Harassment, abuse, inflictions and death from vigilante groups
4	Physical and/or economic displacements	Damage to shelter and business premises; disruption of business and access by construction activities
		Loss of access for business transactions
5	Exclusion claims	Claims of elite/CDA and political capture/monopoly of Project employment and business opportunities
6	Mishaps/accidents	Site accidents
		Wrong placements of cut-offs
		Poor protection measures against adult crossers, school pupils and workers

7	Environmental management lapses	Traffic congestion
		Noise, air, dust and water pollution
		Pressure on community resources- water, power,
		Loss of sense of peace and well being
		Community health- exposure to disease vectors
		Influence on culture
		Others
8	Labour issues	Issues of rates, timely payment, terms of services and layoff etc.
		Child labor
		Discrimination
9	Gender-based violence/Sexual Exploitation and Abuse	Aggressive sexual behaviour
		Rape and other forms of sexual violence particularly towards minors
C	OPERATIONS	
1	Exclusion claims	Non- inclusion in employment by broadband service vendors
2	Enforcement	Conduct of enforcers of Sanitation court, other enforcement related initiatives
		Multiple taxation from local authorities
3	Labour issues	Issues of rates, timely payment, terms of services and layoff etc

Annex 2

Workshop on Structural Options to Accelerate Fiber Deployment in Nigeria

Digital Transformation (DT) Vice President's (VP's) Private Sector Roundtable - Broadband Access, Affordability & Quality