

REPUBLIC OF LIBERIA



MINISTRY OF COMMERCE & INDUSTRY

Liberia Investment, Finance, and Trade (LIFT) Project (P171997)

FINAL STAKEHOLDER ENGAGEMENT PLAN (SEP)

[December 2021]

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LIST OF ACRONYMS

AS Advisory Services

ACH Automatic Clearing House
BDS Business Development Service

CBL Central Bank of Liberia

CERC Contingency Emergency Response Component

CPF Country Partnership Framework

DFS Digital Financial Services

EPML Environmental Protection Agency of Liberia
EPML Environment Protection and Management Law

ESCP Environmental and Social Commitment Plan

ESF Environmental and Social Framework
ESO Enterprise Support Organizations
ESS Environmental and Social Standard

ESSS Environmental and Social Safeguards Specialist

G2B Government to Business
GoL Government of Liberia

GRM Grievance Redress Mechanism
GRP Government Recovery Program

ICT Information, Communications and Telecommunication

IFC International Finance Corporation
IPF Investment Project Financing
JET Jobs and Economic Transformation

LIBA Liberia Business Registry
Liba Liberia Business Association

LIFT Liberia Investment, Finance, and Trade

LRA Liberia Revenue Authority

M&E Monitoring and Evaluation

MDA Ministries, Departments and AgenciesMFD Maximizing Finance for Development

MFDP Ministry of Finance and Development Planning
MOCI Ministry of Commerce and Industry of Liberia

MSME Medium, Small and Micro Enterprise

NAP National Quality Infrastructure

NEPS National Electronic Payment Switch

NUOD National Union of Organizations for the Disabled

NSW National Single Window

OSS One-Stop-Shop

PFI Participating Financial Institution

PIU Project Implementation Unit
PPA Project Preparation Advance
PSC Project Steering Committee

RCCE Risk Communication and Community Engagement

RTGS Real-Time Gross Settlement
SBA Small Business Administration
SEP Stakeholder Engagement Plan

TA Technical Assistance WBG World Bank Group

WTO World Trade Organization

EXECUTIVE SUMMARY

Introduction

In efforts to create an enabling economic environment that promotes sustainable growth, the Government of Liberia, with support from the Work Group (IBRD/IDA/IFC), has proposed to undertake further reforms that will transform the landscape of its real economy and create more and better jobs for its people through the implementation of the Liberia Investment, Finance and Trade (LIFT) Project. Given the adverse economic impact of COVID-19, this project will also allow formal Small, and Medium Enterprises (SMEs), most of which have limited firm capabilities and access to financial markets, to competitively participate in global value chains through exports or import substitution.

The project is designed to help address key constraints that the private sector faces at both economy-wide and firm level, when starting or doing business in Liberia. Through the reforms to be supported under this project, Liberia hopes to send a clear message that it is open for business and that it should be the destination of choice for any potential investor. The project will contribute to transforming the economy of Liberia by leveraging digital technology to promote financial inclusion and reduce the need to transact business through cash.

Project Description:

The Project Development Objective (PDO) is to improve the investment climate, expand access to finance, and facilitate trade in Liberia.

To support the Government of Liberia (GoL) to achieve significant economic transformation, the project will support activities organized under three complementary components (business climate reforms, SME and CCB support, financial infrastructure support), together with a fourth component for project management, M&E and a CERC (or Contingency Emergency Response Component).

C1: Trade and Investment-Enabling Environment will focus on improvements in Liberia's legal and regulatory environment by strengthening key institutions providing Government to Business (G2B) services covering international trade, business entry and private investment support. The component has 3 subcomponents: (a) C.1.1: Support for the National Single Window for Trade (US\$7.5 million) (b) C.1.2: Support for Automated Business Licensing (US\$3.5 million) and (c) C.1.3: Support for Private (US\$4.0 million)

C2: SME Access to Markets and Finance will seek to increase private sector capabilities, competitiveness, access to finance and climate co-benefit investments at the firm level, especially of women-led SMEs. This component aims to support the growth of formal firms with high potential to contribute to job creation and productivity growth in Liberia, creating a more dynamic and resilient private sector, as well as a more robust and sustainable entrepreneurship SME support eco-system. It aims to create a sustainable platform around entrepreneurship by: (i) launching a program delivering technical assistance (soft and hard skills training, tailored advice); (ii) the strengthening of business development services (BDS) offerings as well as institutional strengthening of the Small Business Administration (SBA), the main government agency coordinating SME policies and support; (iii) improving access to finance through capacity building of financial institutions to

better serve underserved SMEs and a line of credit. Particular attention will be paid to firms making their production process more sustainable, go 'green' and address the needs of women-led SMEs.

The component has 2 subcomponents: (a) C2.1: SME Access to Markets (US\$4.0 million) and (b) C2.2: SME Line of Credit (US\$7.0 million)

C3: Digital Financial Services Infrastructure will support Digital Financial Inclusion, through a new National Payments Switch, and a Credit Registry. It allows people to transfer and receive funds and to pay bills from their home, or in a market or store setting, with limited physical contact. Limited physical networks of access points including nascent agent banking and digital access points, contribute to reduced financial access and limited uptake and usage of DFS. The component has 2 subcomponents: (a) C.3.1: National Electronic Payments Switch (US\$7.5 million) and (b) C.3.2: Credit Registry (US\$1.5 million)

C4: Project Implementation, M&E and CERC will support: (i) Government and other actors capacity strengthening for coordination, design, and implementation; (ii) the administrative, technical, safeguards, procurement of goods and services, and financial management by the Project Implementation Unit (PIU) under the oversight of a Project Steering Committee; (iii) the coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; (iv) the establishment of monitoring and evaluation (M&E) mechanism of the project's results and impact; (v) the development of communication activities to publicize and disseminate project results, best practices, and success stories; (vi) impact evaluations; and (vii) CERC, which will be implemented in accordance with the World Bank's Operational Policy OP 8.00 allowing for rapid reallocation of project funds in the event of natural disaster or crisis that may cause or is likely to cause a major adverse impact.

Objective of the Stakeholder Engagement Plan

The overall objective of the SEP is to provide the roadmap for project communications and active consultations with stakeholders to engage them in the design and delivery of the project. The roadmap includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project.

Stakeholder Engagement and National Requirements

National Requirements: Requirements for stakeholder engagement and participation can be found in the Environmental Protection and Management Law (EPML, 2003), Environmental Protection Agency Act (EPA Act, 2003) and the EPA Environmental and Social Impact Assessment Procedural Guidelines. Engagement with all stakeholders, through targeted medium and tool, is intended to allow them voice their concerns, grievance and recommendations for a project during the design, planning, project implementation and decommissioning phases.

Engagements Held: Stakeholders have been engaged since the project concept stage and will continue to be engaged. These engagements have brought together key stakeholders in the government and the World Bank

Group, with two separate virtual missions occurring in both November 2020 and April 2021. Other engagements were carried out in August 2021.

Stakeholder Identification and Analysis

The stakeholders have been categorized into three distinct groups:

- I. Implementing Agencies (MOCI): the entity responsible for the overall implementation of the project. The MOCI has been tasked with the sole responsibility and shall lead the implementation of this SEP.
- II. Affected Parties: these stakeholders have been identified as directly impacted by the project.
- III. Interested Parties: they include secondary stakeholders who are likely to be indirectly impacted through the project delivery of its components or those who have other interest and influence over the project outcome e.g. NGOs, the media etc.

Stakeholder Engagement Program

Adaptation to COVID-19: Given the project will be implemented during the COVID-19 pandemic, engagement and implementation shall be carried out under the guidance of the WHO technical guidance in dealing with COVID-19, which includes (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) RCCE readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. The full guidance can be accessed at: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance.

Methods and Tools for Engagement: Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions. Full details can be reviewed in both sub-heading 0 4.1.1 Proposed Methods and Tools for Stakeholder Engagement and sub-heading 4.2 Proposed strategy for engagement, participation and disclosure. These sections of the report present a wide range of tools and channels for the LIFT Project to communicate its messages and to ensure that the MOCI customises its communication efforts for each target stakeholders. The MOCI will adopt different strategies to engage the different categories of stakeholders depending on the project's impact to them, their preferences, and the objective of the engagement.

Management functions and responsibilities

The responsibility to implement this SEP rest with the following three groups:

- I. Project Steering Committee (PSC) is responsible to supervise and lead the strategic adoption of the implementation of this SEP
- II. Project Implementation Unit (PIU) at MOCI is specifically tasked with the responsibility to implement and manage all aspects of this SEP. Under the guidance of the PSC, the unit shall work with all project stakeholders to ensure that all stakeholders under each component are adequately engaged and grievances are managed and addressed.

III. Technical Counterparts are responsible to manage engagement and respond to grievances of their stakeholders.

Financial Resources and Management

Over the 5-year life of the project (2021 to 2026), the estimated cost to implement the SEP is US\$215,500.00 (Two Hundred and Fifteen Thousand, Five Hundred United States Dollars). This cost shall form part of Component 4 of the LIFT Project and is subject to change upon the update of SEP and substantial changes to any aspect of the project design.

Grievance Redress Mechanism (GRM)

The GRM will address concerns promptly, using an easy to understand and transparent process that is culturally appropriate and readily accessible and that meet the needs of the disadvantaged and vulnerable groups, and at no cost and without retribution. It will not impede access to the already established judicial and administrative remedies. Initial effort to resolve grievances to the complainant's satisfaction will be undertaken by each technical counterpart, service provider and most importantly, the PIU at MOCI. Six steps have been outlined to demonstrate the grievances resolution process.

- Step 1: Uptake. Project stakeholders will be able to provide feedback and report complaints
- Step 2: Acknowledging, Sorting and processing.
- Step 3: Verification, investigation and action.
- Step 4: Resolution and sign-off at the level of the receiving entity
- Step 5: Grievance redress at the level of the PIU at MOCI: I
- Step 6: Lodging of grievance at a National Court of Jurisdiction:

Monitoring and Reporting

The project implementing agencies will employ a monitoring and reporting framework in the execution of the SEP. Key Performance Indicators (KPIs) have been identified to be monitored by the project on a regular basis in relation to the engagement measures proposed in this SEP. The indicators relate to stakeholder engagement and GRM.

1 Introduction

The World Bank Environmental and Social Standard 10 "Stakeholder Engagement and Information Disclosure" provides guidance on the mechanisms to guarantee the involvement of stakeholders throughout a project life cycle, including the stages of conception and preparation of projects financed by the Bank. This document presents an overarching Stakeholder Engagement Plan (SEP) for the Liberia Investment, Finance, and Trade (LIFT) Project to be implemented by the Ministry of Commerce and Industry of Liberia (MOCI). This plan will allow the Ministry to effectively engage with individuals, groups, businesses, service providers and other stakeholders who might be directly or indirectly affected by the activities to be taken up as part of the project. It would also guide the disclosure process for the entire project.

As an ever-evolving document, the SEP is a tool that will be used for the social management of the LIFT Project and is expected to be (i) disclosed prior to project commencement (ii) be the strategic tool for all project related engagements (iii) periodically updated and changes validated during project implementation and (iv) monitored and its effectiveness evaluated towards the end of the project.

1.1 COUNTRY CONTEXT

Liberia is a fragile and conflict-affected country that has experienced a range of highly traumatic periods and, as a result, remains highly vulnerable to external shocks. Two civil wars between 1989 and 2003 destroyed much of Liberia's basic infrastructure and social services, resulting in poor living conditions for most of the population. Progress on human development and poverty reduction has been slow, with poverty widespread across the country. A gross national income per capita of US\$600 in 2018 placed Liberia among the ten poorest countries in the world.

Despite constraints imposed by the current economic and public health conditions, Liberia's fundamental development challenge remains to convert its abundant natural resources into widespread, long-term shared prosperity. Following a quarter century of economic contraction, Liberia sustained a decade of growth and poverty reduction until 2014 when two consecutive sets of twin shocks hit Liberia. The 2014-2016 Ebola crisis and the protracted slump in global commodity prices for the country's main exports (iron ore and rubber) brought Liberia's lengthy post war expansion to a sudden contraction. The incipient recovery that began in 2017/18 was short-lived as Liberia faced its second episode of twin shocks involving an economic downturn that was made worse by a public health crisis.

Additionally, macroeconomic instability, financial sector vulnerabilities and the growth slowdown in 2019 left the country underprepared to absorb the impact of the COVID-19 pandemic. As a result, instead of a slow rebound as projected before the crises, Liberia's economy is now expected to contract further by 2.6 percent in 2021. Liberia reported its first confirmed case of COVID-19 on March 16, 2020, but the large macroeconomic imbalances, low fiscal reserves, and depleted foreign-exchange buffers limited the government's options to respond. As the economic recovery accelerates into growth over the coming years, Liberia will require a higher degree of wage based work and entrepreneurial job creation. Citing the latest 2014 World Bank labour market assessment, the recent Jobs and Skills report, noted the lack of job creation in the post-war boom following the end of the civil wars. Despite sustained economic growth of 7 percent per annum between 2004 and 2013, the population for the most part, remained in the informal farm and non-farm sector. With predominantly low productivity in rural areas leading to rapid urbanization, the sectoral composition of the economy began shifting from agriculture to services.

Unlike other countries agglomeration economies from migration have not served to underpin structural transformation. Workers in Liberia have tended to move sideways from low productivity activities in agriculture into low productivity activities in services (especially wholesale and retail trade). Liberia's youthful, but unskilled population has been migrating to Monrovia and less so to secondary cities. The pathway to more and better jobs, involves the combination of greater private investment, attracted by competitive, well-governed, connected markets, and more productive workers and firms. Supply side interventions to improve technical and business skills in the population are needed as well as an economic environment where the private sector creates good jobs. However, even before the ongoing pandemic started to emerge in March 2020, Liberia's Indicators covering business environment and investment climate pointed to a largely uncompetitive economy. Liberia was ranked 132nd out of 140 economies in the 2018 Global Competitive Index (CGI) and was not included in subsequent GCI rankings.

1.2 PROJECT DESCRIPTION

The proposed project is an explicit contributor to the FY19-FY24 Country Partnership Framework (CPF) Pillar I: Strengthening Institutions and Creating an Enabling Environment for Inclusive and Sustainable Growth. Specifically, the project implements Objective 3 of the CPF, that seeks a more enabling environment for the development of SMEs. The proposed project furthers the CPF's objective by fostering the emergence of an inclusive private sector through a more hospitable investment climate, expanded access to finance, and stronger market governance. As outlined under the CPF, the proposed project envisions the removal of key regulatory constraints, will facilitate trade and expand access to finance. Specifically, the CPF guides the proposed project to focus on (i) the regulatory areas where Liberia ranks low on Doing Business indicators, (ii) implementation of the Financial Sector Development Implementation Plan and National Financial Inclusion Strategy, (iii) implementation of the Insolvency and Restructuring Law adopted in 2017, and (iv) support for Liberia's implementation of commitments to the World Trade Organization (WTO), Trade Facilitation Agreement, since adoption of the long-awaited Customs Code.

The project supports a Jobs and Economic Transformation (JET) framework for Liberia and its two pillars on which the outcomes sit: better market functioning and improved firm capabilities. In doing so, the project targets six of the ten-building block in this framework as a complement to other parallel activities under the Liberia CPF supporting macroeconomic management, infrastructure services, employment policy and human capital. The project takes account of the Government Recovery Program (GRP) project that seeks to support otherwise viable growth oriented private enterprises that were adversely impacted by the effects of the pandemic. As the mechanism for firm level support is structured, guardrails will be established to prevent adversely impacting financial discipline and commercial credit underwriting needed for a sustained recovery. At the same time, with various indicators highlighting access to finance as an issue, attention to expanding digital financial services (DFS) is needed.

In addition to its contribution to the Jobs agenda, the proposed project design supports a range of IDA19 priorities including Gender, Climate, Governance, Fragility, Conflict & Violence and Maximizing Finance for Development (MFD). The project will ensure that women-oriented training and eligibility will be included in firm support and financial access component by deliberately incorporating, in the design of project activities, features that seek to address the identified gaps between men and women with respect to their participation in economic activity in the country, especially around differential constraints and performance between women-owned and men-owned firms. These include the reforms to the business environment (e.g., registration, permits and access to finance), as well as activities to support SMEs and entrepreneurs. The project will monitor the extent to which activities are contributing toward closing gender gaps by measuring, among other things: (i) the number of women led MSMEs with a loan through the project; and (ii) the percentage of women that are covered by the credit registry.

Finally, as a foundational project to strengthen the public sector's ability to facilitate growth of the private sector on a sustainable basis, significant efforts will be devoted to institution building activities in key agencies. The project will draw from international experiences throughout the Sub-Saharan Africa, such as those underway in aspirational cases such as Kenya and Ghana as well as in comparators such as Sierra Leone and Gabon. The project will also learn from and build off local success stories of institutional strengthening such as the Liberia Revenue Authority (LRA), and the Central Bank of Liberia (CBL). Based on these models, the key ministries and agencies charged with serving the private sector in providing services such as trade taxes, clearances, approvals, registration, licensing, and incentives, can be structured to support formal sector operations instead of hindering the ability to do business competitively. As such the project's concept identifies the strengthening of institutional functioning, streamlining of business processes and use of automation to lower costs, improve services and remove face-to face interactions.

1.3 OBJECTIVE

The LIFT Project aims to improve the investment climate, expand access to finance, and facilitate trade in Liberia. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout project preparation and to lay the foundation of stakeholder engagement during project implementation. The SEP outlines the ways in which the

Implementing Agency (Ministry of Commerce and Industry) will prepare a comprehensive list of extended stakeholders, identify their interest, communicate with these stakeholders and include a mechanism by which stakeholders can raise concerns, provide feedback, or make complaints about the project and its related activities in the preparation phase and implementation stage.

The overall objectives of SEP as stated in the ESS-10 are to:

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help the LIFT Project identify stakeholders and build and maintain a constructive relationship with them, in particular projectaffected parties
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation
- Promote and provide means for effective and inclusive engagement with project- affected parties throughout the project life -cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is
 disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and
 format with special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the LIFT Project to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation. The SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10

1.4 National Requirement for Stakeholder Engagement

The Environmental Protection Agency of Liberia (EPA) is charged with implementing the Environment Protection and Management Law (EPML, 2003) of Liberia, a framework environmental law that envisions the development and harmonization of sector-specific laws, regulations, and standards. EPA serves as the principal authority for managing and regulating environmental quality (including environmental and social impact assessments), and it is directed to coordinate all activities relating to environmental protection and the sustainable use of natural resources. It also promotes environmental awareness and oversees the implementation of international conventions related to the environment.

The EPML as well as the Environmental Protection Agency Act (EPA Act, 2003) and the EPA Environmental and Social Impact Assessment Procedural Guidelines provides for the participation of stakeholders at all levels of project implementation in order to ensure that their concerns and inputs are considered as part of the design,

planning, project implementation and decommissioning. The law provides provision for public hearing, provides the platforms for complaints by aggrieved persons, and the opportunity to make comments and provide suggestion on project matters. Several sections of the EPML underscore the need for public consultation, public hearing, and identification of affected persons. For instance, Section 11 of the EPML, amongst other things, requires project proponent or applicant to conduct public consultations to be termed as "scoping" with the objective to identify, inform and receive input from the effected stakeholders and interested parties.

1.5 WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97).

Specifically, the requirements set out by ESS10 are the following:

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

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the

SEP, the Borrower must disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100). For more details on the WB Environmental and Social Standards, please follow the link below: https://www.worldbank.org/en/projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards

1.6 PROJECT COMPONENTS

To support the Government of Liberia (GoL) in achieving economic transformation, the project will support activities organized under three complementary components, along with a fourth component for project management, M&E and CERC (or Contingency Emergency Response Component).

Component I. Trade and Investment-Enabling Environment (US\$16.0 million)

This component supports transformational improvements in Liberia's business environment by strengthening critical Government to Business (G2B) services covering international trade, business licensing and private investment. This component builds on and complements the extensive advisory work that has been carried out in recent years by IFC and others and which will continue through the initial implementation stages of the project. Given the project's emphasis on institution building in a capacity-challenged environment, the ongoing IFC analytical study is deemed critical in fostering complementary reforms, buttressing capacity building efforts and in key strategic areas, to support GoL to rapidly implement the project's activities.

As the lead Government agency for fostering and maintaining a conducive environment for trade, industry and investment, the Ministry of Commerce and Industry (MOCI) is uniquely situated in the nexus of regulatory and business services. With the new African Continental Free Trade Agreement (AfCFTA) and its associated trade facilitation components coming into force, further opportunity lies ahead for MOCI to offer Liberia's traders and producers a cost-competitive trade and production regime. Significant advances in trade and production competitiveness, have become increasingly attainable, not least through new information and communication technologies (ICTs) that automate G2B interactions.

C.1.1: Support for the National Single Window for Trade (US\$7.5 million)

Implementing modern trade facilitation practices has fundamental benefits for Government in terms of better business compliance, increased domestic revenue, and lower costs of operation, official and unofficial. Yet, more important is the benefit to private sector competitiveness as countries and companies are increasingly competing based on transport and logistics as major costs in their supply chains. These costs also affect SMEs disproportionately, who lack the ability to comply with complex trade regulations, opaque border procedures and a high cost of customs compliance. This makes SMEs uncompetitive as suppliers and hampers their integration into regional and global value chains. Thus, the key principles associated with effective trade facilitation include: (i) enhanced use of risk management to allow legitimate cargo flow unencumbered, (ii) application of automation, paperless transactions and on-line interaction to eliminate corruption and increase compliance, and (iii) a 'whole of Government' approach including lead agencies available at the border to ensure coordinated border management. With these goals in mind, the program to establish a National Single Window (NSW) for regulatory compliance, reflects GoL's transformational aspirations for Liberia's trade

orientation. Therefore, the GOL has committed to further trade facilitation reform by considering various NSW solutions available on the market, including proprietary PPP and open-source solutions. Based on the NSW option chosen by the Authorities, the project will support the design, purchase, and implementation of Liberia's NSW.

C.1.2: Support for Automated Business Licensing (US\$3.5 million)

The current system for registering and licensing a formal business to operate in Liberia is both cumbersome and inefficient. The GoL seeks to streamline and strengthen the systems to help potential formal firms enter the market by minimizing the complexity involved in starting a business. To do so, the GoL envisions LBR becoming a first-class, service-based agency capable of immediately responding to business needs. Therefore, the project joins an IFC AS operation to support a modern business registration process that incorporates business licensing. The objective of the project is to enable LBR to eventually function as an effective, automated One-Stop-Shop (OSS) for businesses, and to use its regulatory function to provide a robust, information management system available to the policy makers, lenders and creditors, and potential business partners.

C.1.3: Support for Private Investment (US\$4.0 million)

The GoL has established the Liberia SEZ Authority (LSEZA) to guide the activities of the zones, consistent with the SEZ Act, national policy priorities, including applicable laws, rules, and guidelines. The GoL is in the process of fast-tracking the intuitional, legal, and regulatory arrangements that would affect the full launch of LSEZA and the operation of the proposed SEZ at Buchanan and the Special Agro-Industrial Processing Zone (SAPZ). Sub-component C1.3 will support some of these activities, but not specific zone infrastructure given the project's more limited budget envelope. The project will support SEZ development and other related priority investment work (US\$4 million).

The areas of specific support for private sector-led investment include the following:

- LSEZA (US\$1 million): legal and regulatory support; operations manual; consultants to work with management and staff; preparation of just-in-time studies and diagnostic work (e.g., zone feasibility studies, ESIAs, zone benchmarking, zone/investor demand forecasts); and related capacity building.
- NIC (US\$1 million): investment policy and promotion (IPP) work; capacity building for investor attraction and a new investor grievance mechanism; financial and economic analysis of investments; and coordination work of NIC and other Government agencies.
- IMCC (US\$1 million): strategic review; operational support to the IMCC's secretariat; and capacity building.
- MFDB (US\$500K): support to the Business Climate Working Group and its secretariat; regulatory review of needed near-term business climate reforms.
- Facilitation of public-private dialogue (PPD) between the Government and the private sector (US\$500K) including a focus on green and low-carbon private investment via development of industry guidelines and action plans that increase competitiveness and optimize energy use.

Component II. SME Access to Markets and Finance (US\$11.0 million)

This component seeks to increase private sector capabilities, competitiveness, access to finance and climate co-benefit investments at the firm level, especially of women-led SMEs. This component aims to support the growth of formal firms with high potential to contribute to job creation and productivity growth in Liberia, creating a more dynamic and resilient private sector, as well as a more robust and sustainable entrepreneurship SME support eco-system. It aims to create a sustainable platform around entrepreneurship by: (i) launching a program delivering technical assistance (soft and hard skills training, tailored advice); (ii) the strengthening of business development services (BDS) offerings as well as institutional strengthening of the Small Business Administration (SBA), the main government agency coordinating SME policies and support; (iii) improving access to finance through capacity building of financial institutions to better serve underserved SMEs and a line of credit. Particular attention will be paid to firms making their production process more sustainable, go 'green' and address the needs of women-led SMEs.

C.2.1: SME Access to Markets (US\$4.0 million)

The project will finance TA (US\$4 million) to upgrade the capabilities of SMEs operating in supply chains/clusters to meet the purchasing needs of larger buyers. A private consulting firm with international experience and strong knowledge of the Liberian market will be hired through a competitive process to administer the TA. Eligible supply chains include all productive sectors that can generate high job multipliers and SME increase in sales from invested resources, with an initial focus on agriculture/agro-processing, light manufacturing, and logistics services. Supply chains/clusters in the sectors of mining, fisheries, forestry, tourism, and tradeable digital services will also be considered. The Bank is currently working with MOCI to ensure that the optimal sectors/clusters are chosen for support; two trust funds (infoDEV, C-JET) and the US\$4 million TA money will inform national priorities with firm-level potential. In addition, the Government has already hired a firm to assist with this initial screening work. It is expected that the TA will pay for skills upgrading and training.

C.2.2: SME Line of Credit (US\$7.0 million)

The project will fund a line of credit (LOC) of US\$6.0 million for on-lending to participating financial institutions (PFIs) for loans to SMEs. The TA of Component 2.1 will be designed to 'graduate' SMEs to become more eligible for financing through the LOC facility. CBL will provide oversight of the FIs in this sub-component. US\$1 million in TA will also support this sub-component to help reach the project objectives. Given the reluctance of FIs to lend to SMEs in Liberia due to several factors including a lack of long-term local currency liquidity and deficiencies in SME capabilities, the LOC and TA, along with the firm capability's component (2.1 above), will provide critical access to finance for SMEs.

PFIs will be competitively selected by a committee including the MFDP, MOCI, CBL, based on financial health, good standing with CBL, track record lending to SMEs, indicative pipeline that fulfils project goals, and compliance with E&S requirements. Based on demand, they will be able to access tranches of funds, either in LRD (Liberian Dollar) or USD (US Dollar) from MFDP for on-lending to SMEs as approved by their own credit departments and will then provide periodic reporting to CBL who will verify ex-post eligibility. The PFIs will in general pay interest at the 'savings rate' as competitively determined by the market for deposits and published by CBL.

Liberia does not currently have an apex financial institution to coordinate the overall project portfolio of loans that meet standard World Bank due diligence criteria. It is expected that, by the mid-term review of the

project, a potential apex financial institution will be identified. In the interim period, however, the project will support two specialized retail PFIs chosen through competitive processes. The first retail PFI will serve the small business market and will be a commercial bank with experience financing SMEs. The **second retail PFI** will be a microfinance institution with experience serving the microbusiness sector. This COVID-19 responsive component will build on the successful LOC launched under the Ebola-response SME Finance Facility (P157797). The LOC is also consistent with the Government's National Stimulus Program for Market Women and Petty Traders, its approach to COVID-19 relief and recovery for businesses and jobs and will be coordinated closely with other donor initiatives supporting SMEs (such as USAID and World Bank Social Protection Projects with a grant program for informal beneficiaries).

Component III: Digital Financial Services Infrastructure (US\$9.0 million)

Digital Financial Services (DFS) help governments quickly and securely reach people with cash transfers and reach businesses with emergency liquidity. It allows people to transfer and receive funds and to pay bills from their home, or in a market or store setting, with limited physical contact. Limited physical networks of access points including nascent agent banking and digital access points, contribute to reduced financial access and limited uptake and usage of DFS. Interoperability between payment systems, and the expansion of commercially viable agent networks and digital access points into rural areas play an essential role in building DFS at scale by getting more people to use and become familiar with DFS products. Support for the country's financial infrastructure/DFS include support for two critical items: (i) the national electronic payments switch (NEPS); and (ii) an update of the credit registry. While the NEPS activities are expected to primarily help advance financial inclusion of individuals and micro-enterprises, the modern credit registry is expected to benefit individuals as well as SMEs. Details of this support are outlined below.

These financial infrastructure activities can support climate mitigation and adoption by changing how financial products and services are delivered.

C.3.1: National Electronic Payments Switch (US\$7.5 million)

This sub-component will facilitate the operationalization and implementation of the NEPS in line with the findings of the NEPS assessment requested by CBL and already provided by the WBG. Recognizing the constraints in the current electronic payments landscape in Liberia, the CBL has requested WB support with the implementation of a new retail payment switch with instant payments functionality. Activities under consideration include: (i) TA on carrying out a feasibility study to guide CBL's choice of solution that addresses business and product requirements of financial service providers, and to help to ensure adequate financial commitments and implementation arrangements are in place; (ii) TA to ensure that procurement of the switch is done according to international best practices and to help ensure that the system is run in a manner that makes it sustainable in the long term; and (iii) financing of the necessary hardware, cloud-based solutions, software, and services to implement the retail payments switch. The sub-component's TA will also finance other aspects required to operationalize, manage, supervise and increase usage of the switch.

C.3.2: Credit Registry (US\$1.5 million)

This sub-component aims to facilitate the establishment and operationalization of a modern credit reference system covering individuals and firms through a combination of TA and investments. An IFC funded assessment of the current situation, including IT capabilities for information sharing on the ground, recommending upgrades, legal and regulatory adjustments is expected in late Q2 FY22. This IPF will then

provide: (i) TA on adopting a well-coordinated and competitive tendering process for recommended upgrades and adjustments and the development and implementation of robust system deployment plans, including user acceptance testing and fixes; (ii) TA on roll out of effective credit bureau and data analytics solution; (iii) TA on capacity building and awareness of stakeholders, and (iv) financing for implementation of the remaining phases of the current credit enhancement project, including recommended credit bureau upgrades and adjustments.

Component IV. Project Implementation, M&E and CERC (US\$4.0 million)

This component will support: (i) Government and other actors capacity strengthening for coordination, design, and implementation; (ii) the administrative, technical, procurement of goods and services, and financial management of the project by Project Implementation Unit (PIU) under the oversight of Project Steering Committee; (iii) the coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; (iv) the establishment of monitoring and evaluation (M&E) mechanism of the project's results and impact; (v) the development of communication activities to publicize and disseminate project results, best practices, and success stories; and (vi) impact evaluations. Communications, citizen engagement, and stakeholder coordination activities during the project will also be financed by this sub-component and managed by the PIU. CERC (Contingent Emergency Response Component) (US\$0 million). In accordance with the World Bank's Operational Policy OP8.00, this sub-component will allow for rapid reallocation of project funds in a natural or constructed disaster or crisis that has caused or is likely to cause a major adverse economic or social impact.

Project beneficiaries

The direct beneficiaries of the project will be formal MSMEs, growth-oriented entrepreneurs, individuals using the services provided by the various upgraded government platforms, and financial institutions involved in the project. Within these groups, the project will pro-actively seek direct representation of women. Indirect beneficiaries include the current and potential work force of firms, due to improvements in the investment climate. As the dominate share of formal firms reside in the capital city, the project's geographic focus will be primarily in the urban areas of Monrovia, though some activity in secondary cities is also likely.

2 Brief Summary of Previous Stakeholder Engagement Activities

As part of the project preparation process, multiple engagements were held with the Ministry of Finance and Development Planning (MFDP), the implementing agency (MOCI) and the World Bank and IFC. A joint World Bank/IFC virtual mission was held from November 16-25, 2020 to initiate the discussions for a proposed IDA Investment Project Facility (IPF) to support the Government of Liberia's (GOL) program of Investment, Finance, and Trade (LIFT). Key stakeholders in the government were engaged to discuss (i) the project's Development Objective and expected results, (ii) scope and activities to be supported and (iii) potential implementation arrangements.

A second engagement was held from April 21-27th, 2021 to confirm the technical details for a proposed IDA Investment Project Financing (IPF). During this round of engagement, key government officials and stakeholders were engaged to: (i) discuss specific activities under each of the project components, (ii) discuss implementation arrangements, (iii) agree on the steps needed between now and the Pre-Appraisal Mission and (iv) to finalize the MFDP request for a Project Preparation Advance (PPA).

From August 5 - 6, 2021, a third round of engagement was carried out with key stakeholders to gather input and feedback on documents prepared for the application of the PPA. This engagement brought together the LBR, LRA, MOCI and CBL. During this meeting, the gaps in stakeholder engagement were highlighted and the need for routine engagements was stressed.

Some more stakeholders were identified and consulted from October 5 - 8, 2021 for their concerns and further insights and they include MFDP, MOCI, CBL, LIPA, EPA, and NUOD. Key information and concerns raised by stakeholders engaged include:

Lack of Government interventions/ Elite capture

- Government must pay attention to the business community especially MSMEs as they are the engine of economic growth.
- Stimulus packages must be channelled through recognized business groups and monitored in order to reach the intended beneficiaries hence minimise/ avoid elite capture challenges.

High project interest rates

- Central Bank will implement the economic recovery programme through credit line advances and provision of grant support
- Interest rates should be lower than commercial rates and also lending conditions flexible enough to engender SME survival and growth
- The project to reach agreement with participating financial institutions on rates that will not create market distortions yet affordable
- Central Bank will leverage its existing systems to ensure effective monitoring of participating institutions.

Inadequate E&S capacity and training needs

- Training, especially in the area of E&S, for stakeholders like regulatory bodies, implementing agencies, and affected parties is key
- E&S Guidelines must be developed and integrated into the requirements for lenders and borrowers
- The EPA should spearhead training and capacity building programmes
- Government should readily provide resources for training and capacity building
- Training programmes should cater to the needs of vulnerable groups as well so they can integrate easily into society.

Lack of access to affordable credit

- Interest rates should be reviewed i.e. reduced so that MSMEs can access these loans to grow
- Loan requirements should be made flexible e.g. giving of moratorium on load repayment, relaxation of collateral requirements etc.

<u>Unfavourable customs requirements</u>

Customs requirements should be relaxed to allow MSMEs to import and clear goods with ease.

Competition from foreign businesses

• Government must improve monitoring to ensure that foreign companies do not engage in businesses reserved for locals e.g. retail.

Marginalization of persons with special needs

- NUOD should be actively engaged in proffering solutions to address PWD issues
- Data on PWDs must be properly collected and disaggregated in order to tailor solutions to specific needs.

Empowerment of vulnerable groups

- Grants provided to PWDs should be substantial to make a meaningful impact on their livelihood
- Skills development programmes must be accompanied with tools/equipment to help participant implement what has been learnt.

Annex 3 to 5 present the minutes from the engagements and the list of stakeholders engaged which includes representatives from the Ministry of Finance and Development Planning (MFDP), the Ministry of Commerce and Industry (MOCI), the Liberian Revenue Authority (LRA), the Liberian Business Registry (LBR), the Central Bank of Liberia (CBL) the National Investment Commission (NIC), the Commercial Court of Liberia (CCL) and the Debt Court of Liberia (DCL), Environmental Protection Agency (EPA), Liberia Business Association (LIBA), and National Union for Organizations of the Disabled (NUOD).

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Project stakeholders are 'people who directly or indirectly have a role in the Project, or could be affected by the Project, or who are interested in the Project' Project stakeholders can further be categorized as primary and secondary stakeholders. Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly especially those who are directly affected, including those who are disadvantaged or vulnerable. Secondary stakeholders are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them". Thus, the LIFT Project's stakeholders are defined as individuals, groups, or other entities who:

- Have a role in the project implementation (also known as 'implementing agencies');
- are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
- May have an interest in the Project ('interested parties'). They include individuals or groups whose
 interests may be affected by the Project and who have the potential to influence the Project outcomes
 in any way.

3.1 STAKEHOLDER CATEGORIZATION

For the purposes of effective and tailored engagement, the stakeholders of the LIFT Project can be divided into three core categories:

- 1. Implementing Agencies
- 2. Affected Parties
- 3. Interested Parties

3.1.1 Implementing Agencies

This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the LIFT Project. As the lead Government agency for fostering and maintaining a conducive environment for trade and industry, the Ministry of Commerce and Industry (MOCI) is uniquely situated in the nexus of regulatory and business services and is the sole implementing agency. To meet best practice approaches, the LIFT Project's implementing agency, MOCI, will apply the following principles for stakeholder engagement:

Openness and life-cycle approach: Public consultations for the project will be arranged during the
whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion,
or intimidation.

- Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analysing and addressing comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project is inclusive. All stakeholders always are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups identified by the project which include the rural population, people living with disabilities, women, and disadvantaged youth.

3.1.2 Affected Parties

Affected Parties include parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category: technical counterparts, MSMEs and Financial Institutions. Below is the list of the identified affected parties who may be recipients and beneficiaries of the project, including the technical counterpart institutions:

- MFDP Ministry of Finance Development Planning
- CBL Central Bank of Liberia
- LRA Liberia Revenue Authority
- NSL National Standards Laboratory
- LBR Liberia Business Registry
- PFIs Participating Financial Institutions
- PPD Forum for Private Public Dialogue
- LBA Liberia Business Association
- CCL Commercial Court of Liberia
- EPA Environmental Protection Agency
- MSMEs- Medium, Small and Micro Enterprises
- BDSP Business Development Service Providers
- NUOD National Union of Organizations for the Disabled
- Women's Groups
- Commercial and Debt Courts
- Entrepreneurs and Business Support Organizations (BSOs)
- Nathan's Associates
- LOC Administration
- Project Steering Committee
- Private Sector Working Group
- Research Institutions and Academia
- The Legislature

This group is the core target audience and will be directly affected by the project implementation or/and outcomes. A subset of this category are the vulnerable groups such as women led MSMEs or MSMEs managed by people living with disabilities, the elderly, or children. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program. Engagement with the vulnerable groups and individuals often requires the application of differentiated measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness and participation in the process are commensurate to those of the other stakeholders.

3.1.3 Interested Parties

Interested Parties include stakeholders who may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could influence the project implementation process in some way. Specifically, this category will include the following individuals and groups:

- The local population who can benefit indirectly from the different components of the LIFT Project;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from the LIFT Project;
- Consultants who can support in the delivery of the LIFT Project;
- Ministries, Departments and Agencies (MDAs) Entrepreneurship Support Organizations;
- Business owners and providers of services, goods, and materials that will be involved in the project or MSME's wider supply chain.
- MOCI employees and contractors;
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations. Local NGOs; and
- Enterprise Support Organizations (ESOs), particularly those focusing on MSME development issues.

NGOs may lend assistance in disseminating information about the proposed project(s) to the local communities, including in the remote areas (e.g. by placing information materials about the project in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

3.2 STAKEHOLDER ANALYSIS

The stakeholder analysis involved the identification of key stakeholders, an assessment of their interests and the way in which these interests are likely to affect the planning process, its riskiness and viability. The specific objectives of the stakeholder analysis were to:

- Inform institutions about the LIFT Project and
- Provide institutions the platform to share knowledge and explain and clarify their mandate to guide the process and make it successful.

An assessment of the level of influence of each identified stakeholders in the project implementation helped identify the stakeholders and influence they have over the proposed undertaking. In the context of this analysis, influence is the power which stakeholders have over the planning / implementation process. It is the extent to which people, groups or organizations are able to persuade or force others into making decisions and taking action. Interest indicates the extent to which stakeholders' needs will be affected by means of the planning and subsequent implementation of the project. The relation between this influence and interest can be either high, medium or low as shown in Tables 3-1 to 3-3.

Table 3-1: List of project stakeholders, potential roles and needs

Stakeholder Group	Potential roles in the project	Needs/interest
A. Implementing Agencies MOCI MFDP	Project implementationProject Approval and disbursement of funds	Cooperation from stakeholders for successful project delivery
B. Affected Parties CBL, LRA, NSL, LBR, PFIs, LIBA, CCL, EPA, MSME, Youth Groups, Women's Groups, Vulnerable Groups (NUOD)	 Cooperate during project implementation. Avail themselves as beneficiaries of project activities. 	 Desires to directly benefit from project activities Need protection from exploitation and negative impacts of project
C. Interested Parties MDAs Residents Media ESOs NGOs, CSOs,	 Promote the national development agenda Ensure project is in compliance with Liberian legislations (including labor laws and environmental and social protection laws and policies) 	 Interested in the general socio-economic impacts of the project, both adverse and beneficial Compliance with national laws and regulations Data on project implementation

Table 3-2: Summary of key stakeholders' interest in and influence over project

Stakeholder Group	Potential roles in the project	Influence	Interest
MOCI	Project implementing agency	High	High
MFDP	 Project approval and disbursement of funds 	High	Medium
EPA	 Issuance of environmental permits and monitoring 	High	Medium
MDAs	 Provision of support for project implementation 	Medium	Medium
Affected parties	 Direct beneficiaries 	High	High
NGOs, CSOs	 Advocacy to ensure international best practices are followed and project is implemented in a sustainable manner 	Medium	High
Media	Dissemination of project information to the local communities, including remote areas	Low	Medium

Table 3-3: Stakeholder interest-influence matrix

f Interest	Medium High	Research InstitutionsMedia	 PFIs LIBA MSMEs NUOD ESOs NGOS CSOS Women Group Youth Group MDAs CCL 	 MOCI CBL LRA NSL LBR MFDP EPA
	Low	Low	Medium Level of Influence	High

4 STAKEHOLDER ENGAGEMENT PROGRAM

4.1 ENGAGEMENT METHODS AND TOOLS

The MOCI will employ the use of various methods of engagement that will be used as part of their continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with interested parties may be different from a format of liaising with different affected parties (e.g. focus group discussions, displays and visuals with a lesser emphasis on technical aspects, trainings). Every engagement activity should adhere to the following general requirements:

- should be held at venues that are easily reachable and do not require long commute, entrance fee or
 preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs
 and norms), and inclusivity, i.e. engaging all segments of the project affected parties including the
 vulnerable individuals.
- II. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.
- III. Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques to ensure they are not denied project benefits.
- IV. All consultations should adhere to the premise of 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information.
- V. Capture record of the attendees, location, gender, signature, and stakeholder group. Once consent is received from the audience, the engagement should capture written minutes and or audio recording and photographing.
- VI. Information should be adopted to suit the needs of the stakeholder group (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies.

Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions. Information that is communicated in advance of public consultations primarily includes:

An announcement thereof in the public media – communities, county and national, as well as the
distribution of invitations and full details of the forth coming meeting well in advance, including the
agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and
reaches all areas and segments of the target community. These parameters can be achieved by
implementing the following approach:

- Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available via publicly accessible locations and channels.
- The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places.
- The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for the accountability and reporting purposes.
- Existing notice boards in the communities may be particularly useful for distributing the announcements, such as on boards adjacent to the widely visited public premises (chain stores, transport links, and offices of the local NGOs).
- When the notifications are placed on public boards in open air, it should be remembered that
 the posters are exposed to weather, may be removed by-passers, or covered by other
 advertisements.
- The project's staff will therefore maintain regular checks to ensure that the notifications provided on the public boards remain in place and legible.

4.1.1 Adaptation to COVID-19

Considering the outbreak of COVID-19, individuals are mandated by national directives to exercise social distancing and avoid public gatherings to prevent and reduce the risk of the virus transmission. Meanwhile, WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) RCCE readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. These can be accessed at: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance. See Annex 1 for COVID-19 health and safety guidelines.

Aforementioned considerations require a review of existing approaches to stakeholder engagement and consultations. These are premised on:

- Identifying planned activities requiring stakeholder engagement and public consultations, and for which any postponement may hinder project performance.
- Assessing the level of required direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Evaluating the risks of the virus transmission for and the effect of ongoing restrictions on these engagements.
- Investigating the level of ICT penetration among key stakeholder groups, if feasible, identifying the type of communication channels that can be effectively used in the project context.

In the event where public gatherings with a representative sample of project beneficiaries, affected peoples and other interested parties are not feasible, the project may elect a community representative based on inputs provided by beneficiaries and a network of such representatives can be established across the target

communities to determine feasible methods of wider community outreach and consultation with stakeholders. Alternate forms of messaging would be explored, and contingency plans instituted to tailor engagement when the intended tools cannot be deployed. Some of these include:

- All public gatherings, hearings, workshops and community meetings shall be avoided until deemed safe in line with national and international advisories.
- However, small-scale focus group discussions may be arranged if permitted, with guidance around social distancing and other precautions closely adhered to.
- If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype.
- Online channels, social media platforms and chat groups will be dedicated and deployed subject to ability of all stakeholders to equitably participate in consultations.
- Traditional channels, notably television and radio broadcasting, dedicated phone-lines and mail will also be leveraged to raise awareness of project activities amongst all user groups as needed.
- Each of the proposed channels of engagement should specific mechanisms to solicit feedback from relevant stakeholders.
- In which case direct communication with certain affected peoples are of the essence, channels for engagement, employing a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators, will be designed based on preference expressed by said beneficiaries.
- Everyone involved in stakeholder planning will be trained in positive social behavior and hygiene practices and are required to preface every engagement session by articulating them.

4.1.1 Proposed Methods and Tools for Stakeholder Engagement

Engagement Technique	Description and use	Target audience	Timeframe
	INFORMATION DISS	SEMINATION	
Websites and Social Media Pages	The Project PAD, as well as the, ESMF, ESCP and SEP will be published on the official websites of MOCI and the external website of the World Bank.	All stakeholders	Before Project Appraisal
Media announcements	Advance announcements of commencement of major project activities, project Grievance Redress Mechanism, and other outreach needs of the project.	Project-affected stakeholders and general public	Throughout project implementation
Information Boards of key	Advance announcement of commencement and progress for major project activities.	Offices of service providers, interested NGOs, business associations	Throughout project implementation
Correspondence by phone/ email/written letters	Distribute project information to government officials, organizations, agencies, and companies and invite stakeholders to meetings.	LIFT Project Technical Counterparts, service providers, beneficiaries	On a quarterly basis and as necessary
Distribution of printed public materials: Project information leaflets, brochures, fact sheets, newsletters	This will be used to convey general information on the Project and to provide regular updates on its progress. These materials could be printed and distributed to the different stakeholders during different engagements or it could be emailed.	All LIFT Project interested and affected persons. See list of stakeholders	Bi-annually
Internet/Digital Media	Use of the official websites and social media pages of MOCI, technical counterparts, World Bank, and the Executive Mansion Website to promote various information and updates on the overall project, impact assessment and impact management process, procurement, employment opportunities, as well as on project's engagement activities with the public.		_
	INFORMATION F	EEDBACK	
Feedback and Suggestion Box	A suggestion box can be used to encourage stakeholder, who may have difficulty in expressing their views, to leave written feedback and comments about the Project. Contents of the suggestion box should be	All LIFT Project affected and interested parties, as well as the staff of the implementing agency (MOCI).	Throughout the life of the project

Engagement Technique	Description and use	Target audience	Timeframe
	checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.		
Surveys, interviews and independent evaluations	Different data collection tools will be used to gather beneficiary opinions and views about project interventions and associated impacts and benefits. CSOs could also be engaged to support citizen feedback surveys for the project.	LIFT Project affected parties	Annually
Dedicated hotline and short code	A designated and manned telephone line will be set up that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the project.		Throughout project implementation
	CONSULTATION AND I	PARTICIPATION	
Community / public meetings	These interactive platforms will be used to convey general information on the Project, detailed discussions on sub-project activity that is planned by the project, project environmental and social risks and mitigation measures and to provide regular updates on implementation progress to local, county and national stakeholders.	Project-affected communities	On a quarterly basis
Workshops	This channel will be used to: (i) Present project information to a group of stakeholders; (ii) Allow the group of stakeholders to provide their views and opinions; (iii) Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies; and (iv) Recording of responses.		On a quarterly basis

Engagement Technique	nt Technique Description and use Target audience		Timeframe
Focus group meetings	This will be used to facilitate discussion on specific issues such as GBV, disability inclusion, etc. that merit collective examination with various groups of stakeholders using FGDs.	All project affected parties	During preparation and bi-annually during implementation.

4.2 Proposed strategy for engagement, participation and disclosure

The SEP will be made available in English and when disclosed and distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Electronic copies of this SEP will be placed on the websites of the World Bank, MOCI, Executive Mansion Website and links to the document will also be shared on the social media pages of MOCI. This will allow stakeholders with access to Internet to view information about the LIFT Project and to initiate their involvement in the public consultation process.

Email addresses and phone numbers will be posted on the websites and in the SEP to enable readers to send comment in relations to the disclosed SEP or the overall LIFT Project. The public will be given 60 days for review and feedback, in adherence to World Bank requirements. The PIU will collate the comments, analyse them, incorporate them into project design to improve delivery, respond to those that require responses and commit to reporting back to stakeholders on the final decision and a summary of how comments were taken into account.

For information disclosed through meetings, instant feedback will be collected through designated rapporteurs/data clerk who will be available during the meetings. Participating stakeholders shall also be given freedom to take their own minutes of the proceedings and share a copy with the rapporteurs.

Table 4-1 below shows all relevant stakeholders, key engagement messages, means of engagement and any specific needs in engagement.

Stakeholder group	Specific Stakeholders	Component	Topic of consultation / message	Preferred notification means	Specific needs	Timeline/Locat ion	Responsible
Private Financial Institutions	 Licensed Commercial banks, Insurance Companies, Microfinance Institutions, Rural Community Finance Institutions, Village Savings and Loans Associations, Credit Unions 	• C1, C3	 Awareness of proposed LIFT Project activities. Assessment for the improvement of the quality of loans and what can be done to increase product offering. Capacity building constraints of PFI and assessment of uptake of digital technologies (NEPs, Collateral Registry etc). Environmental and Social Management Systems (ESMS) 	 Surveys, interviews and independent evaluations Workshops Focus group meetings Phone, email, letters 	 Provide sufficient notice, preferably 3 months prior to engagement. Require proposed systems to be reliable and user friendly Cost-free use of the collateral registry, NEPs, etc. 	 Throughout project preparation Nationwide 	 Central Bank of Liberia (CBL) Commercial banks, MFIs, MOCI, PIU, Commercial and Debt courts
Private Sector Businesses (SMEs, MSMEs, BMOs, BDSP, FDIs)	Liberia Business Association (LIBA) Chamber of Commerce	• C1, C2	Awareness of project activities Facilitate discussion to inform project design including ensuring project activities are responsive to private sector needs, risks and challenges that may prevent activities achieving results are identified.	Websites/ social media Media announcements Information Boards of key phone/ email/written letters leaflets, brochures, fact sheets, newsletters Internet/Digital Media Community / public meetings Workshops	 Access to stable internet. Supplies to facilitate social distancing protocol during engagements Cost-free use of the collateral registry, NEPs, etc. Fewer meetings to reduce transportation cost and encourage best use of time towards income generating activities Access to NEPs that also operate offline 	 Throughout project preparation and during project implementation Nationwide 	MOCI/PIU/ CBL

				 Focus group meetings Surveys, interviews and independent evaluations 			
Research Institutions and Academia	 University of Liberia, Cuttington University United Methodist University etc. 	• C4	Awareness of project activities Discussion to ensure that project design takes into consideration recent research and analytics tied to national development agenda	 Phone/ email/written letters Workshops Focus group meetings leaflets, brochures, fact sheets, newsletters 	 Access to stable internet Supplies to facilitate social distancing protocol during engagements Cost-free use of the collateral registry, NEPs, etc. Cost-free access to raw data of the collateral registry, NEP, feedback and monitoring data with beneficiaries 	• Project Preparation and implementatio n	• MOCI/PIU
The Legislat ure	Commercial Court of Liberia	• C1, C4	Awareness of project activities especially those relating to legal and regulatory reforms	 Phone/ email/written letters Workshops Focus group meetings Website/ social media pages leaflets, brochures, fact sheets, newsletters 	notice, preferably 3 weeks prior.	 Throughout project preparation and implementation Quarterly 	• MOCI/PIU
People Living with Disabilities	 National Union of Organizations for the Disabled including all their member groups 	• C2	 Promote awareness of proposed project activities 	 Focused Group discussion Print and social media, etc Public meetings 	 Access to stable internet Supplies to facilitate social distancing 	• Throughout project preparation and	MOCI/PIU

Women	Women Business	• C2	Gain insight on needs of people living with disability to ensure project design is inclusive Awareness of proposed	 Feedback and Suggestion Box Surveys, interviews and independent evaluations 	protocol during engagements • Consultation locations take into consideration accessibility for people living with disabilities • Consultations should	implementation n • Throughout	• MOCI/PIU
Groups (Women in Cross Border Trading, women-led businesses)	Owners • LIBA Women's Wing		 Project activities Identify specific needs and challenges of womenled businesses Identify women-led networking platforms to disseminate information and facilitate engagement 	and independent evaluations Dedicated hotline and short code phone/ email/written letters leaflets, brochures, fact sheets, newsletters	take into consideration specific constraints of women and take into consideration time, travel and childcare constraints • Supplies to facilitate social distancing protocol during engagements • Engagement location are close to the beneficiaries • Ensure confidentiality and the protection on rights for those reporting complaints anonymously • Ensure the interventions are designed to reduce the risk of SEA/GBV/SH	project preparation; Nationwide	- INIOCITIE

Youths	• Youth Entrepreneurs	• C2	Discuss project activities and identify how project activities meets the priority of Liberian youths	 Surveys, interviews and independent evaluations Dedicated hotline and short code phone/ email/written letters leaflets, brochures, fact sheets, newsletters 	 Cost-free use of the collateral registry, NEPs, etc. Supplies to facilitate social distancing protocol during engagements Selection criteria for eligible business are heavily contingent on long years of business existence and experience 	00	• MOCI/PIU
MDAs and Technical Counterpart	MFDP Central Bank of Liberia LRA DBSA NSL LBR	• C1, C4	 Awareness of proposed project activities Obtain clear understanding of roles of selected MDAs in project design and implementation Technical level discussion on key project activities 	 One-on-one meetings Correspondence by phone/ email/written letters Project information leaflets, brochures, fact sheets, newsletters Internet/Digital Media Public meetings Workshops Focus group meetings 	 Supplies to facilitate social distancing protocol during engagements Provide sufficient notice, preferably 3 weeks prior. 	• Throughout project preparation and implementation	• MOCI/PIU

5 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Management functions and responsibilities

The institutional arrangement for the SEP will follow the project's overall implementation arrangements to ensure that stakeholder engagement is fully mainstreamed into the project implementation. The institutional arrangements for the SEP implementation will be managed by the institutional and implementation arrangement stipulated in the Project Appraisal Document.

Project Steering Committee (PSC)

The project will be supervised by a Project Steering Committee (PSC) chaired by MOCI, preferably the Minister or as a fallback the Deputy Minister. Core members of the PSC include representatives of MFDP and CBL, as well as representatives of the private sector. The committee shall include female and disabled persons as its member. The PSC will have the following main roles: (a) coordinate policy actions among public institutions to maximize investment for jobs; (b) provide guidance and support to the program management team and PIU; (c) act as a first-stage grievance committee for all safeguard-related complaints; and (d) act as the main focal point for interaction with development partners and other stakeholders on behalf of the project. The PSC will host, at a minimum, a biannual project review meeting to review the project results, discuss key issues, and agree on key milestones over the following six months.

Project Implementation Unit, MOCI

More specifically, the project will be implemented by a Project Implementation Unit (PIU) hosted by MOCI. The PIU, led by the project coordinator will be responsible for day-to-day management of the project which include: (i) Business Management: marketing, communications, contract management, staff operations, etc.; and (ii) Financial Management: accounting, internal controls, payments, etc.; (iii) Coordination: organizing regular Project Steering Committee meetings and the Private Sector Working Group, working collaboratively with technical partner agencies and other agencies under the project to ensure consistent and regular flow of information between internal and external audiences. Therefore, the responsibility of the implementation and management of the SEP lies with the PIU, which is expected to ensure stakeholders participation in project implementation for the technical effectiveness of project interventions. The PIU is expected to hire a team of environmental and social safeguards specialists to manage all potential risk associated with the delivery of the different project components. The safeguards team shall be tasked with the responsibility to ensure the full implementation and routine update of the SEP.

Technical Counterparts

Project implementers at the different technical counterpart institutions will also be responsible for the implementation of the aspects of the SEP in relations to their respective components to be implemented. These counterparts shall designate staff to work closely with the PIU at MOCI to ensure consistency in delivery. I.e. the credit and E&S officers at the Participating Financial Institutions (PFIs) shall work to ensure that E&S issues including stakeholder consultations and engagement are considered in the credit process.

5.2 FINANCIAL RESOURCES AND MANAGEMENT

The project lifespan is 5 years from 2021 to 2026 and component 5 will include the overall cost to implement the SEP and other measures to mitigate and manage environmental and social risks and benefits of the LIFT Project. Notwithstanding, the table below presents a provisional budget for the implementation of the SEP. This budget is subject to change once the SEP is updated before project appraisal and upon project effectiveness when specific project technical details are decided. The budget presents a projection of the associated cost by method of stakeholder engagement. The total cost to implement the LIFT Project's SEP over the 5-year lifespan is estimated at US\$255,500.00 (Two Hundred and Fifty-five Thousand, Five Hundred United States Dollars).

Proposed Activity	Estimated Cost Year 1 – 2 (USD)	Estimated Cost Year 3 – 4	Estimated Cost Year 5	Total Cost
Media	7,000	5,000	2,000	14,000
announcements				
/radio/ tv				
Social Media	3,000	500	2,000	5,000
Information Boards	2,000	1,000	500	3,500
Correspondence by	6,000	4,000	2,000	12,000
phone/ email/written				
letters				
Project information	16,000	10,000	6,000	32,000
leaflets, brochures,	10,000	10,000	0,000	32,000
fact sheets,				
newsletters				
Feedback and	1,000	-	-	1,000
Suggestion Box				<u> </u>
Surveys, interviews and independent	6,000	6,000	6,000	18,000
evaluations				
evaluations				
Dedicated hotline	3,000	3,000	500	6,500
and short code	,			,
Community / public	18,000	6,000	2,000	26,000
meetings				
Workshops	14,000	12,000	7,000	33,000
Focus group	4,000	3,000	2,000	9,000
meetings				
Grievance Redress	20,000	20,000	15,000	55,000
Monitoring	15,000	15,000	10,000	40,000
Grand Total				255,500

6 GRIEVANCE MECHANISM

In compliance with applicable national laws and the World Bank's ESS10, a project specific grievance redress mechanism is required to handle complaints and issues. The GRM should be accessible to all project stakeholders, including affected people, MSMEs, Technical Counterparts, service providers, indirect beneficiaries, and other interested parties. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner.

6.1 POTENTIAL GRIEVANCES/ DISPUTES

Grievances and disputes may arise from the credit line beneficiary screening process. Disagreements may be in respect of mistakes in the selection of the beneficiaries. Many grievances derive from misunderstandings of project policy, which can usually be resolved through adequate mediation. Most grievances can be settled with additional explanation efforts and some mediation. Therefore, a first instance of dispute handling will be set up with the aim of settling disputes amicably.

Court cases are known to require extended periods of time before settlements can be reached. It is therefore proposed here to make available a first and second tier of grievance management mechanisms, which will be taken care of at the project level, and which will provide aggrieved people with an avenue for amicable settlement without necessarily opening a Court case. Aggrieved people would however remain free to open a Court case without having to registered their grievance with these first and second-tier mechanisms.

6.2 Proposed grievance management of potential grievances/ disputes

The proposed mechanisms will comprise of the following steps:

- Registration; and
- Amicable mediation/litigation and settlement

Registration of grievances

The PIU (Project Implementation Unit) will establish a register of grievances and disputes. The existence and conditions of access to this register (where, when, how) will be widely disseminated among the project partners and stakeholders -as part of the consultation undertaken for the project in general.

Amicable mediation and settlement

Level one

The PIU Environmental and Social Safeguards Specialists (ESSS) and the affected person or his/her attorney will sit to resolve the dispute amicably. The existence of this grievance redress option will be made known early to the project beneficiaries during the project consultation stage.

Level two

The group of mediators attempting amicable mediation/litigation in the second instances will be selected from among the following members:

- Project Coordinator at the PIU;
- An attorney of the affected person(s)/ beneficiaries;
- Representative of the business association to which the affected beneficiary subscribes;
- Representative of a women's group;
- Representative of NUOD;
- A local elder (to be mutually agreed on)

When a grievance/dispute is recorded as per above-mentioned registration procedures, the mediation committee will be established, and the mediation meetings will be organized with interested parties. Minutes of meetings will be recorded.

The existence of this second instance mechanism will be widely disseminated to the affected beneficiaries as part of consultation undertaken for the project in general. It is important that these mediation committees be set up as soon as the project implementation starts.

Appeal to Court

Courts of law will be a "last resort" option, in view of the first and second level mechanisms. The Liberian Constitution allows any aggrieved person the right to access to Court of law. In this case, legal costs will be borne by the Project Implementing Agency, MOCI if the affected person win the case if not the legal fee shall be borne by the compliant or affected persons.

Documentation and Tracing

A complaint log book and file will be opened for all complaints at the project level. The complainant's name, date of complaint, nature of complaint, follow-up actions and their dates will all be logged for future referencing.

Proposed schedule for Grievance Redress

Steps	Process	Description	Time frame	Other information
1	Identification of grievance	Face to face; phone; letter, e-mail; recorded during public/community interaction; others	1 Day	Email address; hotline number
2	Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in a log book)	1-3 Days	Significance criteria Level 1 –one off event;

				Level 2 – complaint is widespread or repeated; Level 3- any complaint (one off or repeated) that indicates breach of law or policy
3	Grievance is acknowledged	Acknowledgement of grievance through appropriate medium	1-7 Days	
4	Development of response	-Grievance assigned to appropriate party for resolution -Response development with input from management/ relevant stakeholders	4-7 Days 10-14 Days	
5	Response signed off	Redress action approved at appropriate levels	4-7 Days	Project coordinator at PIU should sign off
6	Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	7-14 Days	
7	Complaints Response	Redress action recorded in grievance log book Confirm with complainant that grievance can be closed or determine what follow up is necessary	4-7 Days	
8	Close grievance	Record final sign off of grievance If grievance cannot be closed, return to step 2 or recommend third-party arbitration or resort to court of law	4-7 Days	Final sign off on by Deputy Minister-MOCI

6.3 WORLD BANK GRIEVANCE REDRESS SYSTEM

The public and individuals who believe that they are adversely affected by a project supported by the World Bank may also complain directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-

redressservice). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English.

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

Through the World Bank Liberia Country Office in Monrovia: German Embassy, Congo Town, Monrovia,
 Liberia.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s, and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns. In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

7 Monitoring and Reporting

7.1 INVOLVEMENT OF STAKEHOLDERS IN MONITORING ACTIVITIES

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
 - Frequency of public engagement activities;
 - Geographical coverage of public engagement activities number of locations covered by the consultation process;
 - Number and details of vulnerable individuals involved in consultation meetings;
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
 - Type of public grievances received;
 - Number of press materials published/broadcasted in the local, regional, and national media;

The project will establish GRM database that only designated officers can access for entering, tracking corrective action, updating complaint status and generating GRM report. The assigned officer will be responsible for producing GRM report monthly as part of the project reporting channels. Key indicators will include

- Number of grievances received
- Number of grievances resolved within the stipulated timeframe
- Number of outstanding grievances

- Reasons for outstanding cases
- Most reported issues and Correctional Action taken by the project to address these issues etc.

8 ANNEXES

I	the undersigned certify that I am in full agreement, and
satisfy with the decision reached in re	dressing my complaint.
Summary of Complaint	
Complaint	
Agreed Decision Reached	
Date of Complaint	
Signed:	Date:
Contact #:	
Witness:	Date:
Full Name:	
Contact #:	

8.2 ANNEX 2: GRIEVANCE FORM

Referen	ce No			
Name of Compla				
		Cell #:		
Contac	t Details	Email:		
		Address		
Grieva	nce	LIFT Project Components		
Catego		Lift Project Component.		
Grievar Issue/ Compla		Description		
Date In			Location Incident Occurred	
What v you like happer resolve probles	e to see n to e the			
	My identi	ty can be disclosed		
I wish to raise anonymously		aise my grievance		
		disclosure of my identity,		
Receive by:		טווזכוונ		
Date				

Actions Taken to Resolve Grievance

ACTION	OUTCOME	DATE
1 st Action Taken:	Outcome:	Date:
2 nd Action Taken:	Outcome:	Date:
3 rd Action Taken:	Outcome:	Date:
4 th Action Taken:	Outcome:	Date:
5 th Action Taken:	Outcome:	Date:

Resolved
Not Resolved

8.3 ANNEX 3A – MINUTES FROM STAKEHOLDER ENGAGEMENT – NOVEMBER 2020

Stakeholder Engagement

16th - 25th November 2020

The mission kicked off its work based on guidance from Honorables, Augustus J. Flomo, Deputy Minister for Economic Management (MFDP), and Honorable George D. Wolo, Deputy Minister for Commerce (MOCI). As outlined in the mission's presentation, (Attachment 3), the proposed IPF responds to Chapter II of the Pro-Poor 1 agenda by supporting the Government's activities to foster job creating investment by the private sector. Moreover, the proposed IPF project will take into account the temporary disruptions in the normal productivity channels that occurred from the impact of the COVID-19 pandemic

Outcome of the engagement by component and the agreed next step:

MSME Finance Facility

- MFDP will review the examples of transitions from Emergency to Sustainable responses and 'MSME Facility Next Steps' recommendations shared by the WBG
- CBL will conduct a 'targeted examination' (less than an audit but providing useful financial and process/systems information and review) by the end 2020. The WBG will provide suggestions for audit topics for CBL's consideration (as above).
- The WBG will coordinate with the CBL, PFIs, Cash Transfer programs and the Business Registry to assess the extent to which formal MSMEs can be identified uniquely, discuss current situations and assess how a new project component can assist during COVID and beyond.

Resolving Insolvency

- Discuss with Supreme Court regarding the inclusion of the Appellate function of the Supreme Court in the digitization reform
- Adoption of the Commercial Court Rules (outstanding since 2016) and the Insolvency Practitioners Rules by the Supreme Court
- Assessment of needs and scope (hardware, software, training), to come up with an action plan
- Review 2017 Insolvency Law to ensure it provides relief for conditions brought on by COVID19, particularly the impact on MSMEs

Agent Banking

• CBL to review and provide feedback on the Agent banking technical note the WBG submitted in November 2020.

National Electronic Payments Switch (NEPS)

- WBG to deliver the final NEPS assessment to CBL, including recommendation to renegotiate current contract.
- CBL to take decision if they want to go ahead with the preferred option 1 as outlined above.

Credit Registry

- CBL to share information on the new infrastructure and financial proposals for full implementation of the project any required legal / regulatory adjustments with WBG support.
- WBG to share with the CBL the scope of the proposed credit reporting assessment exercise including the Terms
 of References for the assessment of the technical capabilities of the enhanced credit registry system and
 recommended upgrades and adjustments.

Project Implementation and Oversight

The WBG will

- Carry out a National Single Window (NSW) Options Paper in collaboration with the Liberia Revenue Authority and the Ministry of Commerce and Industry,
- Prepare A Business Registry Options Paper to provide policy makers a set of options for institutional autonomy based on various approaches used, around the world;
- Carry out a rapid response version of the WBG Investment Reform Map by reviewing the key areas of the investment life cycle and benchmarking against international practices,
- Apply a standardized World Bank Group benchmarking tool for the PPP Procurement system of Liberia as well
 as addressing other selected areas of infrastructure governance,
- Prepare a policy note, for discussion with MOCI and other stakeholders, that covers key elements of successful SME support systems based on international practice, and
- Deliver the final NEPS assessment.

The Government will,

- Review and decide on how to proceed based on the WBG MSME Facility Next Steps recommendations,
- Through CBL, conduct a financial examination of the MSME Facility
- Based on CBL management decision, how it will resolve outstanding issues with the existing vendor, propose a way forward for the IPF to support the NEPS.
- Encourage, the Commercial and Debt Courts to consult the Supreme Court on (i) digitization reform of the Commercial and Debt Courts, and (2) adoption of the Rules for the Commercial Court and for the Insolvency Practitioners.
- Identify the implementation agency to be established under the LIFT IPF to set strategic direction and house the PIU.

8.4 ANNEX 3B - MINUTES FROM STAKEHOLDER ENGAGEMENT — APRIL 2021

Stakeholder Engagement

21st - 27th April 2021

The engagement kicked off its work with MOCI Deputy Minsters Wilfred Bangura (Administration) and George Wolo (Trade). The proposed IPF supports the Government's activities to foster job creating investment by the private sector, by strengthening the business environment and firm capabilities for participating in the demanding markets involving international trade, whether exporting, indirect exporting or competing with imports. It also responds to the impact of the COVID-19 pandemic by "building the regulatory system back better than before," also with a strong emphasis on faceless interactions among and between business and government agencies through the mobilization of automation and data processing to remove the need for paper based, human driven transactions. The design of the IPF's direct support programs to SMEs will include support for the digital and green solutions that are becoming increasingly necessary for competing in global markets.

Outcome of the engagement by component and the agreed next step:

C.I.1. The National Single Window

- The MOCI will consider and inform by end June, the WBG's endorsement of the use of Nathan Associates to provide logistic and technical support for the preparation of the NSW Policy Paper.
- The Mission will immediately begin building the human and technical resource base to support the MOCI preparation of the NSW Policy Paper and begin fund-raising for the NSW Blueprint.

National Quality Infrastructure

• To assist the MOCI to update its implementation plan based, the Mission will by end June provide a list of qualified consultants and a "term of reference" for MOCI consideration.

National One Stop Shop for Registration and Licensing

• The LBR will provide the Mission by end June a "shopping list' of equipment needed to mitigate the significant risk of a data disaster given the lack of redundancy for the LBR data bases.

Fostering Firm Capabilities to Trade and Competitiveness

The Mission and the MOCI will carry out three market assessments during preparation to identify (i) the cadre
of firms and the range of capabilities constraints to include under the program (ii) the potential support
infrastructure of local and regional BDS providers and (iii) the set of large, trade-oriented firms that would
potentially seek out linkages with good domestic SME suppliers.

MSME Finance Facility

- CBL will provide the finalized 'targeted examination' reports
- CBL will provide the latest financial reports for institutions that may eventually become Apex candidates
- The WBG Team will meet with current and potential PFIs to discuss their current situations and how a new project component can assist them during COVID and beyond, including technical assistance and training opportunities.

Resolving Insolvency

 The Courts will discuss court digitization and engage stakeholders at the WBG-sponsored Liberia Judicial Conference planned in June, and the Supreme Court will send a request letter to the World Bank if there is an appetite.

Digital Financial Services: Agent Banking

- The WB will share the draft version of the concept note with CBL in early June for comments, prior to the final version being submitted end of June 2021.
- The WB will draft technical requirements using generic requirements with validation from the CBL team, by end-May 2021. Technical requirements will be required to conduct an RFP for a vendor to deploy the final transaction monitoring and reporting platform.
- The WB will draft an outline for the agent deployment subsidies program for CBL's input by June 2021.

Digital Financial Services: National Electronic Payments Switch (NEPS)

 CBL to notify the WB in writing by end-May, of any management decision to resolve the issues with the NEPS vendor contract.

Digital Financial Services: Credit Registry

• WB to hire individual consultant to carry out the assessment by early June 2021.

8.5 ANNEX 3C – STAKEHOLDER ENGAGEMENT – AUGUST 5 –6, 2021

Stakeholders Engagement Meeting on the Status of the ERAT-P August 5-6, 2021

The meeting was initially called on August 5, 2021 to update stakeholders on the current status of the Liberia Investment, Finance, and Trade (LIFT) Project but due to lack of quorum, it was postponed to August 6, 2021. The meeting link was shared with all participants and the meeting commenced at 9:00am GMT, August 6, 2021.

Deputy Minister Wolo presided over the meeting and welcomed everyone on the call. There were 9 persons from different institutions who attended the meeting as seen in the above attendance roster.

Julius SAYE KEH-NEL of the SBA provided overview and brought all the stakeholders to speed as it relates to the current status of the ERAT-P. He informed stakeholders that the World Bank has committed additional funding of **US\$20M**, summing the entire ERAT-P envelop to **US\$40M**.

Julius emphasized that as part of the Project Implementation Preparation, the Ministry of Commerce and Industry has developed a package, containing the Stakeholder Engagement Plan, Environmental and Social Commitment Plan and the Project Preparatory Assessment (PPA) Procurement Plan, to be submitted to the Bank through the Minister of Finance and Development Planning for the Bank to release 5 % of the Project amount to finance the PPA.

Outcome of the engagement and the agreed next step:

- Hon. Saa Saamoi, the Commissioner of Customs, Liberia Revenue Authority raised a concern that besides the
 Aide Memoire which was shared during the World Bank Mission's meeting in April 2021, he has no document
 whatsoever in his possession concerning the project. All other stakeholders raised the same issue including Mr.
 Jay G. Brown, Head of the Finance Sector Development Unit at the Central bank of Liberia and Hon. Samson Dee,
 the Registrar General of the Liberia Business Registry.
- Hon. Dee and Mr. Brown both raised concerns on the final PPA procurement plan and wanted to know if priority
 activities of their respective entities and sectors were included in the PPA procurement plan.
- Julius confirmed that some of the high priority activities were included but some procurement activities were
 placed under the main project procurement to be implemented beginning January 2022 due to time constraint.
 He said by not including the activity under the PPA does not mean that it will not be implemented. He emphasized
 that every activity will be implemented to the fullest since the development package has been increased to
 \$40M.

Agreed Next Steps:

- Julius to share drafts of: PPA procurement plan, SEP and ESCP to all stakeholders for their review and inputs before final submission.
- Beageorge Cooper to finalize the SEP after Julius' input and submit same to the Bank for final submission to the Minister of Commerce and Industry.
- Ministry of Commerce and Industry to send the final package of the PPA to the Minister of Finance and Development Planning for onward submission to the Bank.

8.6 Annex 4a - Stakeholders Engagement Attendance List

Ministry of Finance and Development Planning

Hon Augustus Flomo Deputy Minister of Finance MFDP
Frederick Bobby Krah Project Coordinator MFDP

Ministry of Commerce and Industry

George D. Wolo Deputy Minister MOCI
Debra Nebo Deputy Minister MOCI
Alphonso Kuiah Assistant Minister MOCI
Julius Saye Kehnel Consultant MOCI

Liberia Revenue Authority

Hon Saa Saamoi Commissioner LRA

Judiciary

Hon Judge Eve Mappy Morgan Chief Judge Commercial Court

Hon Justice Francis Korkpor Chief Judge Debt Court

Liberia Business Registry

Samson M. Dee Registrar General LBR

National Investment Commission

Hon Molewehle Grey Chairman NIC

Quintin Tunis Investment Promotion Director; NIC

Melvin Sheriff Concessions & PPP Director NIC

Central Bank of Liberia

Fonsia Donzo Director CBL
Erica R. Williams Assistant Director, Mobile Money CBL
Miatta Kuteh Director CBL
Jay Brown Head CBL
George B. Gould Deputy Head CBL

8.7 ANNEX 4B - STAKEHOLDERS ENGAGEMENT ATTENDANCE LIST — AUGUST 5-6, 2021

	Attendance							
#	Name	Position	Institution	Contact Info				
1	George D. Wolo	Deputy Minister for Trade and Commence	MOCI	0777440020				
2	Prince Wreh	Advisor to the Minister/MOCI	Office of the Minister/MOCI	0880286628				
3	Steve Mambu	Technical Director	National Standards Lab/MOCI	0886246161				
4	Domahson Gbeakeh	WTO Unit Coordinator	Department of Trade/MOCI	0776621238				
5	Julius Y. SAYE KEH-NEL	SME/Agribusiness Development Consultant	SBA/MOCI	0886822025				
6	Samson Dee	Registrar General	LBR/MOCI	07777764901				
7	Saa Saamoi	Commissioner of Customs	LRA	0886727666				
8	Jay Brown	Head of the Financial Sector Development Unit	CBL	0777459051				
9	Beageorge Cooper	Social Development Specialist - Consultant	World bank	0777442233				

8.8 ANNEX 5 - MINUTES FROM STAKEHOLDER ENGAGEMENT — OCTOBER 5 — 8, 2021

Stakeholder Engagement

5th – 8th October, 2021

Meetings were held with, 3 Government Institutions/Agencies; the National Body of Indigenous Liberian Businesses, LIBA, Business Owners at the County and District Levels, Women Business Owners and the National Body for Persons with Disability.

Details of the meetings and photographs are presented below.

Stakeholder/ Institution/ Location	Contact Person(s)	Role	Contact No.	Date	Concerns Raised/ Information Received
Regulatory Instit	tutions				
Central Bank of Liberia	Jay G. Brown	Head of Development Finance	+231 886910240	06/10/2021	 The Central Bank is responsible for regulating the financial/banking sector Within the bank, development programmes are handled by the Development Finance Section with roles including coordination of donor funded programmes, financial sector reform programmes and provision of MSME support For the LIFT Project, the approach will be to: Provide credit line advances through Apex institutions i.e. a Commercial bank and a Non-Bank Financial Institution. Selection of participating institutions will be on Competitive Tender basis and a safety and soundness assessment conducted on the institution before contract award Provide grant support The Central Bank will not solely determine the applicable interest rates. However, it will encourage participating institutions to charge rates lower than the commercial rates of 18-24% Participating financial institutions will have an opportunity to agree with the bank on the interest rates to apply to avoid market distortions The Central Bank will leverage its existing systems to ensure effective monitoring of participating institutions The Central Bank does not have an Environmental and Social (E&S) Department and guidelines that financial institutions must follow In liaising with institutions like the EPA, the Central Bank depends on the Development Finance Section of the Bank with plans on the establishment of an Environmental Working Group The commercial banks take E&S issues into consideration when financing projects. However, this varies from institution to institution as there are no guidelines In Liberia, the banking system has the Central Bank, 9 Licensed Commercial banks, Insurance Companies, 2 Microfinance Institutions, Credit Unions
Environmental Protection Agency	John K. Jallah Jnr.	Compliance and Enforcement Manager	+231 888121715	08/10/2021	The EPA, which is an autonomous institution under the Office of the President, is responsible for regulating activities relating to the environment and headed by an Executive Director

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	Rafael S. Ngumbu	Head of Environmental Research and Radiation Safety	+231 775764953		 The Executive Director is assisted by a Deputy, Chief Technical Officer, Managers (Heads of Department), Assistant Managers (Heads of Units) and Technicians The EPA has departments including Administration, Finance, Intersectoral Coordination, Multilateral Development, and Enforcement and Compliance Most projects fall under the Enforcement and Compliance Department which has units namely Technical and Inspectorate, Conservation, Environmental Research and Standards, and Environmental Radiation and Safety At the County level, there are Assistant Managers who serve as County
	Lenn Gomah	Environmental Chemist	+231 776946161		 Coordinators/Inspectors The Counties have about 50% of the 70 – 80 EPA workforce. Also, plans are in place to train 100 inspectors to support at the County level
	Daoda S. Carlon	Assistant Manager, ESIA	+231 886036695		There are offices in 10 out of the 15 Counties with a few of the offices serving more than one County. A 5-year development plan has been developed to set up County and District Level Environmental Committees to manage affairs at that level
	Joseph F. Charles	Laboratory Technician	+231 777932238		 Currently, the Environmental Assessment and permitting process includes Application, Screening, Scoping, Impact Assessment and Public Disclosure Response from EPA which will require the completion of an Initial Environmental Assessment (IEA) form or the preparation of an Environmental Project Brief Project are categorized into A (High), B (Medium) and C (Low) based on the significance of their impacts For every IEA form submitted, the proponent is required to submit corresponding environmental quality data e.g. air, noise, water, soil Project proposals are evaluated by a team of independent 3rd party consultants to avoid bias and assure quality These 3rd party consultants are trained by the EPA every 2 years and certified to carry out their activities Approvals issued by the EPA include ✓ Permits and ✓ Licenses e.g. Effluent discharge license, chemical registration license, importation license, handling and storage license, laboratory licenses for 3rd party laboratories The EPA currently does not have a dedicated training department so trainings are conducted by respective departments as and when required Challenges include lack of adequate capacity, logistics and the unwillingness of government to pay required fees for government projects

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					Work is currently ongoing to strengthen the EA process especially the Fees regime
Focus Groups	<u> </u>		<u> </u>	<u> </u>	
Liberia Business Association (LIBA)	James M. Strother Dominic Nimely Michael J. Teekay George C. Willicor	Chairman, PAHC Chairman, SCI Chairman, Business Development and Training	+231 886811029 +231 776234093 +233 776456135 +233 779037352	06/10/2021	 LIBA is the mother organization that represents all indigenous Liberian businesses and has presence in all the 15 counties The Association has a 3-tier administrative structure i.e. National, County and District At the national level, the association is led by a President who is elected and assisted by a Vice, Secretary General, Financial Secretary, and Chairpersons of Committees (6) At the county level, the association is led by a Coordinator who is also elected and assisted by a Co-coordinator, General Secretary, Finance Secretary, Treasurer, and Advisors/Chaplains At the district level, the association is led by an elected District Coordinator Membership of the association is voluntary and the current membership is about 5,000 indigenous businesses LIBA gets no support from the government and funds its activities solely from membership dues Dues range from USD 60 to USD 100 depending on the category of business i.e. sole proprietorship, partnership or corporation With an annual budget of about USD 120,000, dues collected tend to be woefully inadequate in covering salaries of administrative staff, allowances of executive officers and training costs Some trainings conducted for members include customer service, sales and marketing, financial literacy i.e. bookkeeping and negotiation skills The association partners with members with adequate capacity to conduct training especially in areas where there is inadequate capacity internally e.g. EPA training on climate change and greenhouse gases for members in the refrigeration business The objective is to have at least 2 trainings per month making a total of 24 per annum Some challenges faced by local businesses are Access to finance High interest rates i.e. 18 – 24% Unfavourable loan conditions e.g. short tenure of loans Unfavourable customs requ

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Margibi County LIBA	Thomas F. Rodes	County Coordinator	+231 886354142	07/10/2021	 ✓ Foreign businesses accessing aid meant for locals ✓ Lack of monitoring to ensure adherence to business regulations e.g. that one business is not acting as an importer, distributor and retailer at the same time In the area of environmental management, plans are in place to set up a recycling plant to help manage the waste of about 426,000 households Also, with adequate support, LIBA expects to train about 2,250 businesses on various topics including E&S issues across the 15 counties LIBA, at the County level, is led by a Coordinator who is elected for a 6-year term The coordinator is assisted by elected executives and this includes district
	Rev. Johnson M. D. Sumo Snr.	Chaplain	+231 888646551 +231 776997196		 coordinators who lead various districts The districts have the same leadership structure Businesses that members engage in include farming, agribusiness, production (garisoap etc.), sale of general merchandise, sale of used clothes, retail of pharmaceutical products, transport services Expectations are that members will receive loans immediately they join LIBA but these expectations tend to be unmet A stimulus package received in the past saw beneficiaries receiving amounts between USD 1,500 and USD 10,000 with an interest rate of 5% but there has been no such package recently Some challenges mentioned by members include ✓ Inability to access flexible loans or credit ✓ High Interest rates ✓ Short loan tenure ✓ Competition from foreigners in businesses meant for locals e.g. sale of iced water ✓ Unavailability of funds for the running of operations at the local level especially the district level as all the dues paid are sent to the national office
	Nowah Kalleh Walta Fofana	Member Member	+231 778061143 +231 775987359		
	Fatu J. Mulbah	Member	+231 886697832		
	Francis A. Mulbah O. Jay G. F. Morris	Member	+231 886908504		
	Salta Dunor	District Coordinator	+231 886653642		
		Treasurer	+231 776269610		

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Women Group of LIBA in Margibi County	Nowah Kalleh Walta Fofana Fatu J. Mulbah Salta Dunor	Member Member Member Treasurer	+231 778061143 +231 775987359 +231 886697832 +231 776269610	07/10/2021	 Women engage in petty trading, dress making, sale of used clothing, farming, gari processing, sale of juice, sale of pharmaceutical products etc. to support their families Some families are women-led and business proceeds tend to be woefully inadequate to support the family and children sometimes do menial jobs to support the family Most businesses owned by women are sole proprietorship LIBA requires that businesses are duly registered and this has encouraged most women in the county to register their businesses Women are encouraged to take up leadership roles so the deputy or co-coordinator roles in the counties are mostly occupied by women Access to affordable credit is a major problem as interest rates of microfinance institutions are quite high e.g. 30% form institutions like BRAC Loan conditions tend to stifle businesses e.g. absence of moratorium on loan repayment significantly affects business as the first instalment is deducted before advancing the loan Expectations are that government will provide some financial relief in the form of loans or a stimulus package at an affordable rate to women
National Union of Organizations	Naomi B. Harris	President	+231 886331485	06/10/2021	 NUOD is the mother organization for the 40 Disabled People's Organizations (DPOs) and Organizations of Persons with Disability (OPDs) in all the 15 Counties. Members of NUOD include the visually impaired, physically challenged, hearing
for the Disabled (NUOD)	Peter Flomo	First Vice President	+231 886553676		 impaired, persons recovering from mental health and drug addiction, albinos etc. Development proposals hardly consider Persons with Disability (PWDs) who constitute about 16% of the total Liberian population
	Daniel Dagbe	Second Vice President	+231 886463693		 Despite government's policy that for every 100 civil servants employed, 4 should be PWDs, it is not being adhered to PWDs therefore resort to begging for alms or self-employment as the only means of livelihood Currently, NUOD is being supported by an Italian NGO, AIFO in 4 Counties The 3-year AIFO Business Start-up Project is supporting 15 businesses with USD 2,486 (USD 1,000 as grant and USD 1,486 as loan) PWDs presently engage in beekeeping, farming, livestock production. There are plans to venture into other areas including snail rearing, fish farming etc. PWDs expect to be empowered through access to finance, skills development/training, provision of tools/equipment for work and mainstream
	Lai Gotolo	Youth Coordinator	+231 776755349		
	Bill S. Gallah	President, Cultivation for User's Hope	+231 770368261		
	Heylove R. Mark		+231 777848183		employment

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	Johnice W. Yangbe	Treasurer LM	+231 770188907		 It is key that PWDs are provide with training to ensure that their integration into society is easier Data on PWDs must be properly collected and disaggregated in order to tailor solutions to specific needs NUOD should be actively engaged in proffering solutions to address PWD issues Grants provided to PWDs should be substantial to make a meaningful impact on their livelihood

Presented below are photo evidence of stakeholder engagements held:

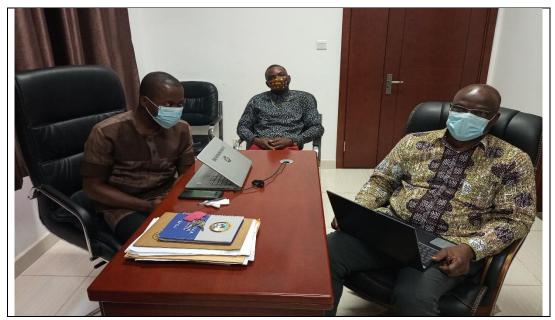


Plate 1: Meeting with Representatives of the Ministry of Commerce and Industry in Monrovia



Plate 2: Engagement with the Head of Development Finance at the Central Bank of Liberia



Plate 3: Meeting with Officers of the EPA, Liberia



Meeting with the National President of the Liberian Business Association



Some Executives of LIBA at the meeting

Plate 4: Consultation with the Liberian Business Association



Plate 5 Interaction with business owners at the county and district level



Plate 6 Women business owners sharing their experiences



Plate 7: Meeting with Executives of the National Union of Organizations for the Disabled