REPUBLIC OF LIBERIA

FORESTRY DEVELOPMENT AUTHORITY

REQUEST FOR EXPRESSIONS OF INTEREST FOR PROVISION OF CONSULTANCY SERVICES FOR ADVANCING THE LIBERIA CONSERVATION TRUST FUND AS A NATIONAL PROTECTED AREAS FINANCING MECHANISM

LIBERIA FOREST SECTOR PROJECT

PROJECT ID: P154114

GRANT ID: TFA2427

(REFERENCE NO: LR-FDA-82490-CS-CQS)

1. This request for expressions of interest follows the General Procurement Notice for this project that appeared in Development Business No. WB452-01/17 of January 31, 2017.

The Republic of Liberia has received a grant from the Government of Norway in the amount of US$36.7 million equivalent through the World Bank towards the cost of the Liberia Forest Sector Project, and it intends to apply part of the proceeds of this Grant to eligible payments for the provision of consulting services for advancing the Liberia Conservation Trust Fund as a National Protected Areas Financing Mechanism.

2. **OBJECTIVES AND SCOPE OF SERVICES**

The objective of this assignment is to assess the current Trust Fund structure and operational instruments, as well as provisions for capitalizing the fund, and aligning it with other relevant mechanisms and strategies in Liberia, and to develop a roadmap for developing the LCF into a truly national mechanism for financing a protected area network in Liberia.

Specific objectives of this assignment are as follows:

i. Update and strengthen governance structures as well as processes, procedures and protocols of the LCF to help ensure its highly effective operation and application to Protected Areas in Liberia;
ii. Enable the LCF to mobilize a diverse range of funding sources within a realistic time period on a scale that is sufficient to sustain the LCF and support the operational needs of specific Liberian protected areas (PAs), including the East Nimba Nature Reserve. In this context, recommend adjustments to the existing governance structure of the Fund to draw upon and manage diverse sources of funding and to administer the Fund and its disbursements transparently.

iii. Enable the LCF to secure additional financial resources to expand to the broader Liberian protected areas network and to other national conservation priorities over time.

The key activities that the Consultant should carry out include management/coordination, finalize operations manual, develop LCF financing strategy, and formulate LCF expansion plan.

_This assignment is expected to be implemented within six (6) months after contract signature._

_**Note: The full terms of reference can be found below, as an attachment to this request for expressions of interest.**_

3. The Forestry Development Authority now invites eligible consultancy firms to indicate their interest in providing the required Services for the Liberia Forest Sector Project. Interested consultants must provide information indicating that they are qualified to perform the services (brochures, description of similar assignments, experience in similar conditions, availability of appropriate skills among staff, etc.). See qualification and experience criteria below:

**QUALIFICATION AND EXPERIENCE**

- World-class expertise pertaining to international best practice in conservation trust fund design, establishment, and management, including (but not limited to) legal, fiscal, budgetary, business planning, and strategic considerations;
- Understanding of the Liberian national conservation context, including but not limited to protected area policy and strategy; community conservation policy and strategy; and the regulatory environment that shapes protected area finance options;
- Understanding of environment and social safeguards in the context of protected areas and conservation fund supported activities;
- Professionalism in delivery of high quality, actionable deliverables, including but not limited to excellent stakeholder process management, disciplined time management, clear and consistent communications tailored to specific audiences and stakeholders, and preparation of clear and compelling final materials for dissemination, policy engagement, and funding solicitation.

_**Note: In addition to other relevant information to be submitted, Consultants (firms) are advised to present all assignments of similar nature undertaken in the following format:**_
4. The attention of interested Consultants is drawn to paragraph 1.9 of the World Bank’s "Guidelines: Selection and Employment of Consultants [under IBRD Loans and IDA Credits & Grants] by World Bank Borrowers Conflict of Interest, January 2011 revised July 2014 ("Consultant Guidelines"), setting forth the World Bank’s policy on conflict of interest.

5. Consultants may associate with other firms in the form of a joint venture or a sub-consultancy agreement to enhance their qualifications.

6. A Consultant will be selected in accordance with the Selection based on the Consultants’ Qualifications method (CQS). For reference, please see paragraph 3.7 of the World Bank’s Guidelines on Selection and Employment of Consultants, January 2011 revised July 2014, by following the link below:

7. Further information can be obtained at the address below during office hours 0900 to 1600 hours.

8. Expressions of interest must be delivered in a written form to the address below (in person, by mail or by e-mail) by 16:00 GMT on March 12, 2019. Envelopes or subject of emails must be marked “Ref: Advancing Liberia Conservation Trust Fund”.

Forestry Development Authority
Wein Town, Mount Barclay
P. O. Box 3010
Montserrado County
Monrovia, Liberia
Attention: National REDD+ Project Coordinator
Tel: +231(0)886567224
Email: reddliberiaprogram@gmail.com & cc: hdd1960wllms@gmail.com
Attachment 1: TERMS OF REFERENCE

Advancing the Liberia Conservation Fund
as a
National Protected Areas Financing Mechanism

Background

Liberia contains about 4.3 million ha of lowland tropical forest that comprises 43 percent of the remaining Upper Guinea forests of West Africa. Most of Liberia’s rural population is dependent on forests and their various products and ecosystem services. Liberia is faced with enormous challenges in managing its forests to contribute in a balanced way to long-term, sustainable economic growth; supporting the livelihoods of rural communities; and ensuring that its important national and global heritage is conserved. As part of the reform process, Liberia has been working with the World Bank to reduce its emissions from deforestation and forest degradation, foster conservation, ensure sustainable forest management (SFM), and enhance forest carbon stocks (REDD+). Liberia’s REDD+ strategy aims to build the country’s capacity, so that it is ready to participate in the REDD+ program, which will provide payment for proven results in emissions reductions. Toward this end, the Government of Liberia (GoL) and the Government of Norway (GoN) signed a Letter of Intent (LoI) in September of 2014. The Liberia Forest Sector Project (LFSP) is a result of this partnership, aimed at the improved management of, and increased benefit-sharing in, targeted forest landscapes. Implementation of the LFSP is led by the Forestry Development Authority (FDA), with the Environmental Protection Agency (EPA), Liberia Institute of Statistics and Geo-Information Services (LISGIS), Ministry of Agriculture (MOA), Ministry of Lands, Mines and Energy, and the Land Authority (LA) implementing specific sub-components of the project.

The LFSP envisages support to the establishment and potential scale-up of a conservation trust fund for Liberia.

In 2016 the Liberia Conservation Fund (LCF) was established, reflecting the joint efforts of the FDA, Conservation International (CI) – Liberia, and several other partners and stakeholders. Although initially motivated as a dedicated financing mechanism to support the East Nimba Nature Reserve (ENNR) and community-based conservation efforts around ENNR, the LCF was conceived as the first step towards a financing mechanism for the entirety of Liberia’s national protected area network. To establish the LCF, the partners developed an LCF Operation Manual (OM) with associated processes and procedures.
Objectives

The objective of this assignment is to assess the current Trust Fund structure and operational instruments, as well as provisions for capitalizing the fund, and aligning it with other relevant mechanisms and strategies in Liberia, and to develop a roadmap for developing the LCF into a truly national mechanism for financing a protected area network in Liberia.

Specific objectives of this assignment are as follows:

iv. Update and strengthen governance structures as well as processes, procedures and protocols of the LCF to help ensure its highly effective operation and application to Protected Areas in Liberia;

v. Enable the LCF to mobilize a diverse range of funding sources within a realistic time period on a scale that is sufficient to sustain the LCF and support the operational needs of specific Liberian protected areas (PAs), including the East Nimba Nature Reserve. In this context, recommend adjustments to the existing governance structure of the Fund to draw upon and manage diverse sources of funding and to administer the Fund and its disbursements transparently.

vi. Enable the LCF to secure additional financial resources to expand to the broader Liberian protected areas network and to other national conservation priorities over time.

Scope

The key activities that the Consultant should carry out are listed in the Workplan table. This section provides additional activity-specific details.

Management/Coordination

Inception Report. The Consultant will prepare an inception report with additional background, workplan and methodology details, and specific timelines.

Stakeholder Coordination Meetings. Success of the LCF critically depends on broad-based stakeholder buy-in. Therefore the process of further developing the LCF requires considerable investment in stakeholder coordination meetings that keep key stakeholders informed, allow them to help shape the development process, offer ample opportunity to review evolving plans and provide feedback, and solicit endorsement and validation. The consultant must consider relevant additions to the group of stakeholders involved in LCF development to date (principally FDA, EPA, Ministry of Agriculture, and Ministry of Finance and Development Planning) to advance the Fund further (e.g. Ministry of Information, Culture and Tourism, Ministry of Mines and Energy, Ministry of Internal Affairs, Liberia Land Authority, Liberia Maritime Authority, major conservation NGOs, etc.). The draft workplan identifies key junctures for stakeholder coordination meetings; other points requiring additional meetings may be identified. The design process also needs to consider permanent arrangements for stakeholder advisory roles.
Update/Coordination Meetings with FDA. The Consultant will liaise closely with the FDA throughout execution of the project. The draft workplan identifies key junctures for stakeholder coordination meetings; other points requiring additional meetings may be identified.

Finalize Operations Manual

Analyze Gaps. The Consultant will review the entirety of the OM with specific attention to criteria and procedures to identify which portions (i) appear to be satisfactory; (ii) have apparent deficiencies and propose improvements; or (iii) do not yet exist and draft such sections of the OM. The Consultant will do so taking into account requirements of the Fund’s legal domicile as well as the need for practical guidance relevant to the Liberian context. Key operational concerns include (i) eligibility criteria and prioritization criteria for selecting activities to be financed by the LCF; (ii) ways to help ensure additionality (i.e. activities that receive support are not budgeted under other sources of funding); (iii) efficient management of requirements for sub-grants to protected area management or other conservation activities; (iv) transparency and accountability with respect to management of funds; and (v) governance provisions that ensure responsiveness to collective needs and interests of a broad set of stakeholders at national and local levels.

Alignment with Donor Requirements. Anticipating core elements of the financing strategy, the Consultant must review the OM and suggest revisions and additions that respond to requirements of likely donors. In doing so, the Consultant will conduct a desk review and also consult with World Bank and other international expertise related to conservation trust funds, to obtain input on best practices and design principles. Another step is to ensure that the OM includes best practice environmental and social safeguards, which will benefit from consultation with relevant World Bank expertise. Requirements of other donors will be surveyed to ensure that the LCF is eligible for support from the widest possible donor base, including those relating to governance, financial management, and spending rules. Key donor groups to consider include multilateral and bilateral agencies, private firms, foundations, and international NGOs.

Develop LCF Financing Strategy

Update Cost Modeling. The Consultant will review and update the various costing exercises that have been conducted for individual protected areas and the protected area network, to inform funding targets for the LCF. The update will distinguish between establishment costs (for those protected areas that have not yet been gazetted), up-front investment (capital) costs, and recurrent (operating) costs. This updating of LCF funding targets should take into account LCF’s expected role in covering funding gaps (without substituting for any existing funding); most of these gaps are likely to involve recurrent costs, since protected area establishment costs and up-front investment costs tend to be more easily covered through donor-funded projects. The Consultant should estimate the minimum threshold amount of LCF capitalization that would result in meaningful annual conservation payments to ENNR and other Liberian protected areas.

Review financing planning efforts to date: The FDA and partners have conducted various efforts with respect to financial planning for Liberia’s protected areas. The Consultant will review these
efforts for the purpose of aligning and coordinating these various efforts into a single, coherent financing strategy for the protected area network and associated conservation activities. A central goal is for the LCF to serve as a national-level conservation funding mechanism, to supplement the funds available from the Liberian Government and from donor-funded projects.

Assess potential for aligning LCF finance strategy with other conservation financing mechanisms. The Consultant will examine the potential for channeling funds to and through the LCF from existing or planned mechanisms relating to conservation finance in Liberia. These include the Benefit Sharing Trust, the conservation fee, and other fees as foreseen in the National Forestry Reform Law (2006), levied in the commercial forestry sector by FDA, fines and other levies collected by EPA, and, notably, biodiversity offsets. Biodiversity offsets from large-scale mining or other extractive industries may be an important future funding source for the LCF, for directed investments specific to individual protected areas, community-based conservation, or even overall LCF capitalization. The Consultant will review the recent World Bank Group publications, (i) *Biodiversity Offsets: A Use Guide* and (ii) *A National Biodiversity Offset Scheme: A Road Map for Liberia’s Mining Sector*, and examine how to align the OM with the emerging national biodiversity offset framework.

Tourism Strategy. Although the size of the tourism sector in Liberia will remain limited in the immediate term, several of Liberia’s protected areas are well-positioned to eventually be an important part of the country’s tourism asset base. The Government of Liberia already has a *National Export Strategy on Tourism (2016-2020)*, the FDA is commissioning a Study on Tourism and Eco-Tourism under the World Bank-supported Liberia Forest Sector Project (LFSP), and protected area managers are incorporating tourism within management plans. Accordingly, early alignment between the LCF and these processes can help avoid duplication of efforts and ensure that they contribute to LCF financing in the future. Therefore the Consultant will examine ways in which the LCF can proactively participate in these processes.

Formulate LCF Expansion Plan

Multi-stakeholder consultations to assess and prioritize protected area establishment. Various planning exercises have taken place over the years regarding when and how the gazettement of Liberia’s Proposed Protected Areas (PPAs) should be pursued. Currently, Liberia has five gazetted national PAs: Sapo, East Nimba, Lake Piso, Gola Forest, and Grebo-Krahn; one more (Wonegizi) awaits the preparation of a final gazettement package; and, under LFSP, two are currently undergoing feasibility studies (Foya and Krahn-Bassa) and three are slated to have feasibility studies carried out (Kpo Mountain, Cestos-Senkwehn, and Grand Kru-River Gee). It is understood that new PAs may be gazetted long before significant LCF funding might be available to support their operating costs. This is because (i) gazettement is most likely during specific “windows” of high-level political support and (ii) gazettement (even if initially just “on paper”) may be needed to keep PPA lands from being allocated to other uses (concessions, community forests, etc.). Taking these factors into account, the Consultant will work with stakeholders to review the expected sequence and timing of future protected area establishment, to help estimate the potential future demand for LCF support to new protected areas.
Multi-stakeholder consultations to identify other priority conservation activities outside of national Protected Areas for LCF support. Ensuring that core operations of Liberia’s Protected Area network are financially sustained is the principal purpose of the LCF. However, achieving national conservation objectives also requires effective actions outside the boundaries of protected areas, particularly in the form of community-based conservation. The Consultant will work with stakeholders to identify these priority actions, including criteria, selection processes, and monitoring and evaluation requirements, to ensure that the LCF has concrete operational guidance (this activity is closely related to the Analyze Gaps activity above).

Methodology

The methodology for this consultancy will rely principally on document review and synthesis, findings from a study tour, stakeholder consultations, and preparation of drafts for input and approval by FDA in consultation with key stakeholders.

Document Review and Synthesis. Document review will concentrate on existing LCF documents (draft OM, incorporation instruments/by-laws); Government of Liberia policy documents relating to establishment and management of protected areas; policy documents concerning related sectors (the above-mentioned Tourism strategy, documents relating to other relevant financing mechanisms, etc.); and protected area costing work conducted by FDA with conservation partners Conservation International, Flora and Fauna International, and others. As needed, the Consultant will also draw on literature on international best practice relevant to Conservation Trust Funds, Environmental and Social Safeguards, community-based conservation, etc. The Consultant will be expected to compile a comprehensive inventory of documents to be reviewed in the course of preparing the Inception Report. The majority of documents that will serve as inputs for this Consultancy are publicly available; FDA will facilitate access to required documents as needed.

Study Tour. In addition to the desk review, it is recommended that revisions and adjustments to the Operational Manual be informed by a study tour to observe other successful and best-practice examples of conservation fund governance and administration in the region. The Consultant will organize this study tour to examine one or more successful examples of conservation fund operations, together with a small team of relevant stakeholders including FDA representatives. The Ivorian Fondation des Parcs et des Reserves en cote d’Ivoire (FPRCI) and/or another study area, relevant to the Liberian context, should serve this purpose.

Operational Requirements of Protected Areas. Analyze the management gaps of existing Liberian Protected Areas to fulfill minimum eligibility criteria for the LCF. Describe required structural and organizational changes, if any, in the Protected Areas and in FDA to fulfill criteria in the OM. The example of the Tai National Parc in Ivory Coast, receiving funding from the FPRCI on an annual basis, may serve as an interesting reference in this regard.

Stakeholder Consultations. Stakeholder consultations will be a combination of bilateral discussions, working sessions with key stakeholders, and validation workshops with broad-based
participation. These consultations require that the Consultant have an in-country presence in Liberia. Bidders without a Liberia-based presence will need to budget adequately for international travel and extensive time in-country at several junctures as per the draft workplan.

Document Preparation. The Consultant will propose a detailed timeline of draft submissions, review periods, and final submissions in the Inception Report, at which point it will be subject to negotiation with the FDA.

Deliverables

The Consultant will prepare and submit draft deliverables in MS Word, written in clear, concise English, with adequate time for FDA review, including FDA solicitation of feedback from other parties. Costing exercises will be conducted in MS Excel, and delivered in workbooks that lend themselves readily to revision and updating by FDA.

The first deliverable will be:

i. Inception Report, with finalized workplan, timeline, and further details on methods, stakeholders to be engaged, and approach to consultations and reviews of materials.

After the Inception Report, the work to be performed under these Terms of Reference will generate four main deliverables, each of which includes subsidiary products as interim inputs into the final products. The main substantive deliverables are:

ii. Presentation of Key Findings from the Desk Review and Study Tour: Reflections from the desk review and study tour, including key issues relevant to the OM and options for addressing these, will be presented to relevant stakeholders. The Consultant will organise a stakeholder workshop and will present the key findings and options for addressing the main gaps. The Consultant will note carefully the stakeholder feedback received.

iii. Updated Operation Manual (OM), reflecting input from wider stakeholder group and incorporation of environmental and social safeguards provisions

(Interim products will consist of annotated checklists identifying gaps to be addressed in the update, and an interim draft of the updated OM for stakeholder review and feedback).

iv. Updated Financing Strategy

(Interim products will consist of updated cost estimates for Liberia’s PA network; briefing notes summarizing previous financing efforts, alignment with benefit sharing
trust, biodiversity offset mechanisms, other conservation/environment funding mechanisms in Liberia, and national tourism strategy; and an interim draft of updated financing strategy for stakeholder review and feedback)

v. **Roadmap for LCF development** over time, taking into consideration anticipated evolution in Liberia’s national protected area network as well as prioritization of conservation finance needs to be addressed by the LCF

(interim products will consist of briefing note summarizing stakeholder input regarding prioritization and sequencing of PAs and other conservation activities, and an interim draft of expansion roadmap for stakeholder review and feedback)

For envisioned draft timeline and expected deliverable due dates, please see the accompanying Workplan table (the selected firm shall prepare an updated work plan for implementation).

**Duration of the Assignment**

The total duration of this assignment is expected to be approximately six months from the date of signing of the contract.

**Client’s Inputs and Counterpart Personnel**

The FDA will provide all documentation in its possession required for the conduct of this assignment. The FDA will also introduce the consultant to relevant stakeholders and facilitate access of the consultant to information held by other stakeholders.

Cost of the planned study tour and of the workshops related to presentation of interim and final reports to be held in Monrovia shall be borne by the consultant and should be costed in the proposal.

The FDA shall assign a responsible counterpart representative from the FDA Conservation Department.

**Required Expertise and Selection Criteria**

The Consultant firm shall possess the following essential capacities and experience. The range of requirements for this consultancy envisions independent, team-based execution, suitable for a selected team of individuals or a firm/organization that is not currently represented on the LCF Board.

: 
i. World-class expertise pertaining to international best practice in conservation trust fund design, establishment, and management, including (but not limited to) legal, fiscal, budgetary, business planning, and strategic considerations.

ii. Understanding of the Liberian national conservation context, including but not limited to protected area policy and strategy; community conservation policy and strategy; and the regulatory environment that shapes protected area finance options.

iii. Understanding of environment and social safeguards in the context of protected areas and conservation fund supported activities.

iv. Professionalism in delivery of high quality, actionable deliverables, including but not limited to excellent stakeholder process management, disciplined time management, clear and consistent communications tailored to specific audiences and stakeholders, and preparation of clear and compelling final materials for dissemination, policy engagement, and funding solicitation.

Key Experts:

Team Leader / Conservation (Protected Areas / Biodiversity) Trust Fund Expert:
- Master’s Degree in forestry or natural resource management or relevant subject field;
- Minimum 15 years of demonstrable experience in the field of biodiversity conservation focused on conservation financing;
- Proven track record on designing Conservation (Protected Areas / Biodiversity) Trust Funds;
- Good understanding and knowledge of environment sector financing issues in the Sub-Saharan Africa region will be an asset.

Legal expert:
- Advanced legal degree
- Minimum 10 years of working legal experience.
- Experience of handling legal aspects of establishing independent funds with adequate governance structures a must.
- Work experience in Sub-Saharan, especially West Africa, and knowledge of Liberia is desirable.
- Fluency in English and good English writing skills are required.

Procurement Method and Guidelines to be Used

A Consultant will be selected in accordance with the CQS Method set out in the Consultant Guidelines Selection and Employment of Consultants (under IBRD loan and IDA credit and Grants) by World Bank Borrowers, dated January 2011 and revised in July 2014.
## Tentative Work Plan

<table>
<thead>
<tr>
<th>Task</th>
<th>Activities</th>
<th>2019</th>
<th>Deliverables</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.1</td>
<td>Overall management of the assignment</td>
<td></td>
<td>Inception Report (by Mar. 16)</td>
</tr>
<tr>
<td>0.2</td>
<td>Inception Report submitted to FDA</td>
<td></td>
<td>Record of meeting minutes (within 1 week of each meeting)</td>
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<tr>
<td>0.3</td>
<td>Stakeholder coordination meetings</td>
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<tr>
<td>0.4</td>
<td>Update/coordination meetings with FDA</td>
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<tr>
<td>1</td>
<td>Finalize LCF Operations Manual</td>
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<tr>
<td>1.1</td>
<td>Solicit input on current OM</td>
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<tr>
<td>1.2</td>
<td>Analyze gaps with respect to governance needs for system (compared to needs for single PA)</td>
<td></td>
<td>checklist of issues to address (by Apr. 6)</td>
</tr>
<tr>
<td>1.3</td>
<td>Analyze gaps with respect to WB expectations; and potential contributors to the Fund</td>
<td></td>
<td>checklist of issues to address (by Apr. 6)</td>
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<tr>
<td>1.4</td>
<td>Address need for safeguards provisions</td>
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<tr>
<td><strong>Conduct study tour</strong></td>
<td><strong>Conduct a workshop and present results from desk review and study tour for stakeholder feedback</strong></td>
<td><strong>Develop LCF Financing Strategy</strong></td>
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<td><strong>1.5</strong> Prepare revised draft for consultations/review</td>
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<td><strong>2.1</strong> Extend updated cost modeling to Liberia’s other PAs</td>
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<tr>
<td><strong>1.6</strong> Consultations/review</td>
<td></td>
<td><strong>2.2</strong> Review PA and conservation financing planning efforts conducted to date (at national and individual PA levels)</td>
<td></td>
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<tr>
<td><strong>1.7</strong> Prepare final draft</td>
<td></td>
<td><strong>2.3</strong> Assess potential for aligning LCF finance with the Benefit Sharing Trust (and any other relevant existing financing mechanisms identified)</td>
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**Notes:**
- Revised draft Operations Manual (by May. 18)
- Final LCF Operations Manual (by Jun. 22)
- Report on cost estimates (by Jul. 20)
- Briefing note (by Jul. 20)
- Briefing note (by Jul. 31)
<table>
<thead>
<tr>
<th></th>
<th>Task Description</th>
<th>Due Date</th>
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<tbody>
<tr>
<td>2.4</td>
<td>Assess potential for aligning LCF finance with tourism strategy (national and local levels)</td>
<td>Briefing note (by Jul. 31)</td>
</tr>
<tr>
<td>2.5</td>
<td>Prepare draft financing plan for consultation/review</td>
<td>Draft LCF financing plan (by Aug. 17)</td>
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<tr>
<td>2.6</td>
<td>Consultations/review</td>
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<tr>
<td>2.7</td>
<td>Prepare final financing plan</td>
<td>Final LCF financing plan (by Sep. 23)</td>
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<tr>
<td>3</td>
<td>Formulate LCF expansion plan</td>
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<tr>
<td>3.1</td>
<td>Conduct multi-stakeholder process to prioritize/sequence incorporation of additional PAs under LCF</td>
<td>Briefing note (by Jul. 31)</td>
</tr>
<tr>
<td>3.2</td>
<td>Conduct multi-stakeholder process to determine funding priorities, if any, beyond PA support</td>
<td>Briefing note (by Jul. 31)</td>
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