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Subject AFD's No-Objection n° ANO 2018-77
Stakeholders Engagement Plan (SEP)
"Support to the Implementation of the National Solid Waste Management Strategy" project (CJO 1062 03 U)

Reference EXT/LL/2018-

Your Reference No-objection requests received by email from Eng. Hussain - Mhaidat, Director of the Solid Waste Management department in MoMA - on 15/07/2018 and his e-mail dated 24/07/2018 (attached).

Amman, on July 25th, 2018

Your Excellency,

In reference to the above mentioned e-mails of Eng. Hussain Mhaidat, dated July 15th 2018 and July 27th 2018, I am pleased to inform you that AFD is providing its no-objection to the Stakeholders Engagement Plan (SEP) related to the operations of the "Support to the Implementation of the National Solid Waste Management Strategy" project (CJO 1062 03 U).

Kindly note that this SEP shall be included in the implementation process off all the activities that will be implemented through the above mentioned support along with the Environmental and Social Commitment Plan that is part of the project's financing agreement.

Best regards,

Samuel Lefevre
Deputy Director

Attachments : - Stakeholders Engagement Plan (SEP)
- E-mails of Eng. Hussain Mhaidat requesting AFD's no-objection on the SEP

Copy to : - H. E. Dr. Mary Kawar, Minister of MoPIC



MINISTRY OF MUNICIPAL AFFAIRS

PROJECT IMPLEMENTATION UNIT (PIU)

**STAKEHOLDER ENGAGEMENT PLAN (SEP) for Solid Waste
Project (SOWP)**

SOLID WASTE MANAGEMENT DEPARTMENT

JULY 18

STAKEHOLDER ENGAGEMENT PLAN

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1 GLOSSARY

Term	Definition
AFD	Agence Française de Développement (French Development Agency)
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
GIZ	German Office for International Cooperation
HSE	Health, Safety and Environment
JICA	Japan International Cooperation Agency
JSC	Joint Service Councils
3Rs	Reduce, Re-use and Recycling
EU	European Union
WW	Waste water
SEP	STAKEHOLDER ENGAGEMENT PLAN
PIU	Project Implementation Unit
WAJ	Water authority of Jordan
MoEnv	Ministry of Environment
MOL	Ministry Labour
MoH	Ministry of Health
MWI	Ministry of Water and Irrigation
SLCs	Stakeholder Liaison Committees
SOWP	Solid Waste Project
TS	Transfer Station
DS	Dump Site

2 CONTEXT

In 2016, Jordan, country of 9,5 million inhabitants of nationality of whom 30 % of non-Jordanian, is confronted since the Syrian crisis with an increase of its population and with a degradation of the public services in particular as regards the management and the waste treatment. The most critical aspect of the sector is situated at the level of the transfer and of the waste treatment with a single site of elimination of waste in the satisfactory environmental standards.

To answer the increasing challenges met by the country related to the fast growth of the quantities of waste produced, the Council of Ministers approved in September, 2015 the "National Strategy for the Solid Waste Management " defining the main axes for the improvement of the Waste Management Sector at country level.

The strategy targets at improving over the coming 20 years from "a waste management formerly ineffective, expensive and with minor assess of environment and social practices" to "a modern and integrated management, based on **the 3Rs - reduce, re-use and recycling principle**». This will be achieved by incrementally improving solid waste facilities and strengthening in parallel the institutional, legal and regulatory framework.

Under MoMA responsibility, the National strategy is being operationalized with two Regional MSW Master Plans: the North and Centre plans. Master plan for the south will be prepared with the support of the AFD and will enter into force in 2019

3 RATIONALE OF THE SEP

Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

4 SW FACILITIES INCLUDED IN PIU

4.1 PROJECT DESCRIPTION

In order to support the effective implementation of the National Strategy for Solid Waste Management, the European Union (EU) decided to support the Jordanian Government with a EUR 100 Million grant aimed at:

- providing a technical support to the implementation of the National Strategy for Solid Waste Management,
- preparing and financing a consistent portfolio of investment subprojects,
- Offering budgetary support to sustainably strengthen the SWM sector.

As part of this grant, the EU decided to fund the **Solid Waste Project** (SOWP – AFD id. number: CJO 1062), amounting to EUR 55.3 Million, for which AFD was delegated the management of the funds.

The SOWP includes three main components:

- (i) Infrastructure and facilities,
- (ii) Support to the operation of a Project Implementation Unit (PIU), embedded in the Ministry of Municipal Affairs (MoMA, as line Ministry in charge) to implement the SOWP, and
- (iii) Capacity building activities to the benefit of the stakeholders involved in the SWM sector.

4.2 AREA OF INTERVENTION

List of Projects considered for investment and subprojects proposed is presented below. This list has been defined through the National Solid Waste Management Strategy and the Regional Master Plans. It is subject to changes.

The types of infrastructures and equipment considered by the AFD for investments are:

- New sanitary landfills;
- Landfill upgrades and extensions;
- New transfer stations;
- Improvement of old transfers stations; and
- The closure of the existing dumpsites

Table 1: Type of intervention

AFD earmarked operation sites and facilities - Solid Waste - Jordan (Project Component - EU		
(as per final agreement reached between parties dated on 18/3/2018)		
MSWM Service Areas (catchment area)	Type of intervention	Name/location of site
North-West	earthwork/land stabilisation	Al Ekaider (WW bassins & zibar)
	new sanitary capacities (1 or 2 cells)	Al Ekaider Sanitary Landfill (WW bassins & zibar)
	Closure of old dumpsite	Al Ekaider dumpsite (WW bassins & zibar)
	new transfer station	To be determined (within the Catchment Area)
	Closure of old dumpsite	Al Aghwar Al Shamalyeh dumpsite *
North-East	new sanitary capacities (cells)	Al Huseyneyat Sanitary Landfill
	new transfer station	To be determined (within the Catchment Area)
	Closure of old dumpsite	Al Huseyneyat dumpsite
Centre	new transfer station	To be determined (To replace Al-Humra dumpsite which will be closed by MoMA) within the Catchment Area

5 REGULATORY CONTEXT

5.1 ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

The procedures followed in the SEP shall fit in addition to the Jordanian legislation on the involvement and integration of local communities in the decision-making process concerning projects for the establishment of solid waste management facilities with the WB standard **ESS10: Stakeholder Engagement and Information Disclosure**

5.2 RELEVANT JORDANIAN STAKEHOLDER ENGAGEMENT REQUIREMENTS AND LEGISLATION

Stakeholder engagement in Jordan is connected to the preparation of an Environmental and Social Impact Assessment (ESIA)¹ and is a requirement of the "EIA Regulation No. (37) Of 2005" – see Table 1 below. For those projects, which require an ESIA, the Regulation requires a scoping session with potentially affected stakeholders at the onset of the ESIA, in order to provide stakeholders with project information and allow them to participate in the ESIA process.

The Ministry of Environment requires the following stakeholder groups to be invited to the scoping session: national government entities; local governmental agencies; non-governmental organisations; academic and research institutions; and local community representatives.

¹ ESIA's are also referred to as Environmental Impact Assessment (EIA)

The Regulation specifies that the outcomes of the ESIA are to be announced to the public and stakeholders in a manner that the Ministry of Environment (MoEnv) deems appropriate and is dealt with on a case by case basis – taking into account the type and nature of the project development.

There is no national legal requirement on MoMA to disclose information or consult with affected parties – other than statutory authorities and utilities – outside of the ESIA scoping process.

Table 2: Key Legal Framework in Jordan Requiring Stakeholder Engagement

Law	Summary of Stakeholder Engagement Requirements
Environmental Impact Assessment (EIA) Regulation (No. 37 of 2005)	This Regulation sets out the ESIA/EIA process in Jordan. Its annexes provide screening criteria, listing the types of projects, which require a comprehensive EIA or a preliminary EIA study, and those for which neither is needed. For projects which require a comprehensive EIA, a public scoping session is required to set the Terms of Reference (ToR). The purposed of the scoping session with potentially affected stakeholders at the onset of the ESIA, is in order to provide stakeholders with project information and allow them to participate in the ESIA process. The Regulation specifies that the outcomes of the ESIA are to be announced to the public and stakeholders in a manner that the Ministry of Environment deems appropriate and is dealt with on a case by case basis – taking into account the type and nature of the project development.

5.3 SOWP REQUIREMENTS

Typically, since Stakeholder engagement is supposed to occur throughout the project, a SEP needs to be developed from the Project (or rather subproject) Identification phase. It will then be further developed during the ESIA phase (Consultation process) and then be taken over by the Project Owner and Operator once the subproject is implemented.

The following requirements of stakeholder engagement during project preparation:

- Identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (“affected parties”), or (ii) may have an interest in the project (“other interested parties”).
- Identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. the SOWP PIU E&S expert will identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. Employees are generally considered stakeholders.
- All relevant document produce in the scope of the project must be translated into Arabic. Ideally, a summarized version of key document should be circulated to ensure a broadcasting of information.

This Stakeholder Engagement Plan has been developed in accordance with the resettlement policy framework (RPF) and E&S Environmental and Social Management Framework **and requires AFD NO objection**

6 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT

There have been many previous experiences examples in community consultations related to solid waste Projects. Such experience are shown in the examples below:

- In previous EIA, for Al-Ekaider conducted by MeHSIP Team on 2013 several meetings with JSC site staff were made over the course of the study, where information was acquired regarding the site, the management procedures, and the problems and views of the three consulted groups. The EIA team carried out 3 specific consultations on 7th June 2012. These were held with;
 - Representatives of the JSC site workers,
 - Representatives from the waste-pickers,
 - A representative from Al-Ekaider village.
- In addition, as part of the public consultation, individuals were interviewed by Environmental Planning Engineering and Management (EPEM) Team on 2015 and consulted on the project

social, economic and environmental impacts. Local communities' interviews were conducted on 15th of Dec 2015.

- The above activities were a part of ESIA of Al-Ekaider.

7 IDENTIFICATION OF PROJECT STAKEHOLDERS

In order to define a communication process with the stakeholders, several groups that may be interested and/or affected by the project implementation have been identified. There are a number of groups of people and social groups who are interested in the Project on different levels. In particular, for this Project, these may be identified as following:

- People, social groups and organisations who will be directly or indirectly affected by the project: This group mainly includes nearby local communities and other nearby receptors (farms, industrial establishments, etc.); and
- People, social groups and organisations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group mainly includes governmental entities such as the Ministry of Environment (MoEnv), Ministry Labour (MoL), Ministry of Health (MoH), Ministry of Water and Irrigation (MWI)/Water Authority of Jordan (WAJ, etc.).

The main groups of stakeholders identified so far are listed in the tables below. The list can be updated and modified in the course of the Project development and because of cooperation of the parties.

Table 3 : stakeholders :Possibility to Influence and Make Decisions on Implementation of the Project

stakeholders	Influence
Ministry of Environment	<ul style="list-style-type: none"> ■ Validates EIAs (ToR + site screening) ■ Oversees MSWM activities carried out by the Municipalities and JSCs in order to ensure that they are being carried out in an environmentally safe way
Ministry of Health	<ul style="list-style-type: none"> ■ Responsible for monitoring professional Health and Safety (H&S) of the employees in MSWM facilities
Water Authority of Jordan	<ul style="list-style-type: none"> ■ WAJ monitors environmental impacts on soil, groundwater and surface water due to leachate generation and management in SW disposal sites.
Ministry of Labor	<ul style="list-style-type: none"> ■ Responsible for the protection of workers' health and safety and has requirements on health checks, provision and use of protective equipment and operational procedures for employees in different types of industry
Joint Service Councils (JSCs): Aghwar Al Shamaliyah JSC Al Mafraq JSC Irbid JSC Al Balqa JSC	<ul style="list-style-type: none"> • Responsible for Municipal Solid Waste Collection and Treatment following delegation of responsibilities by the Municipalities: transfer/transport, treatment and disposal • Responsible for managing SW facilities connected to SOWP • Might be reluctant to a change in system – especially if their role is diminished in favor of private operators
Ministry of Finance, Department of Land & Survey	<ul style="list-style-type: none"> ■ Ownership investigation, new registration, issuing property statement

Table 4 Stakeholders who May be Directly or Indirectly Affected by the Project

Stakeholders	Influence
Municipalities	<ul style="list-style-type: none"> ▪ Responsible for MSWM (collection, transfer/transport) ▪ Paying Municipal contribution to the JSCs for further MSWM activities (mainly treatment)
EU	<ul style="list-style-type: none"> ▪ Partly funding the SOWP project
AFD	<ul style="list-style-type: none"> ▪ Manages the funds of the EU for the SOWP ▪ Supervises the SOWP project
MoMA	<ul style="list-style-type: none"> ▪ Leads and implement the SOWP project ▪ Opening and management of SOWP special account (located in Central Bank) ▪ Determining project performance indicators with the EU and the GoJ ▪ Processing timely payment of SOWP suppliers upon request/supportive documentation prepared by PIU ▪ Recruitment of the technical assistance (TA) experts and of the Auditor for annual technical and financial audits ▪ Liaising with the other Jordanian Government line Ministries and other agencies, when necessary ▪ Validating reports prepared by the PIU and submitting them to the AFD and relevant Stakeholders Benefiting from capacity-building activities to be implemented as part of the SOWP.
GIZ	<ul style="list-style-type: none"> ▪ Focuses mostly on programs related to Solid Waste Collection (except for their project on AL-Ekaider Dumpsite) ▪ Training (workshops and mechanics), Cash for Work ▪ Core element of future projects would be sorting and recycling ▪ Integration of informal workers (waste pickers) into formal framework/employment ▪ In charge of implementation of the Livelihood Recovery Plan (LRP) for the SOWP Project (informal project affected population)
UNDP	<ul style="list-style-type: none"> ▪ AL-Ekaider landfill upgrading, transfer stations construction equipment and upgrading, recycling, training and institutional support to municipalities and waste pickers integration into formal employment. ▪ Limited interaction with other international actors
Waste pickers on dumpsite (hired by contracted recyclers)	<ul style="list-style-type: none"> ▪ Waste-pickers that have a contractual agreement with a middle- man who has a contract with the local JSC, which allows them to access the site, to segregate and utilize the recyclable material from the solid waste received at the dumpsite
Waste pickers on dumpsite and TS (not hired by contracted recyclers)	<ul style="list-style-type: none"> ▪ People picking and sorting waste without any agreement with Contractors or JSC. May be source of conflict with other waste pickers. ▪ They are apparently operating in some dumpsites or TS; they may include refugees and Roma people.
Citizen living next to the sites	<ul style="list-style-type: none"> ▪ Can be impacted by new projects developing near their houses – in terms of displacement or nuisances
Populations with economical activities on or around the site not linked with SW (farmers, breeders, etc.)	<ul style="list-style-type: none"> ▪ Can be financially impacted by new projects developing on the land they use

8 STAKEHOLDER ENGAGEMENT PROGRAMME AND ACTION PLAN

8.1 STAKEHOLDER ENGAGEMENT PROGRAMME

Given the lack of communities around the landfills and transfer stations, this SEP is based on:

- Establishing a **stakeholder Liaison Committees for SOWP sub-projects** and using this to provide updates and keep local community informed on the Project and other related activities and plans at projects sites, and **on the grievance mechanism**;
- Working with the **SW directorate in MoMA** to raise public awareness on waste management;
- Holding bilateral discussions with statutory authorities and utilities, e.g. in relation to environmental monitoring (MoEnv), risks to water resources (WAJ etc).

8.2 COMMUNICATION METHODS WITH STAKEHOLDERS

For each of the stakeholder group the specific communication methods and tools PIU will use have been identified. A description of the **communication methods to be adopted by PIU for engagement** is provided below.

PIU will use existing **communication methods** where relevant and have identified the additional specific measure of establishing a stakeholder Liaison Committee for the sub-projects. The objective of employing various methods with each stakeholder group is in order to ensure easy, transparent, direct, open and interactive communication with all stakeholders and to get as earlier as possible their feedback in the different phases of project implementation.

8.2.1 Stakeholder Liaison Committees (SLCs)

PIU, in coordination with SW directorate in MoMA, will establish a Liaison Committee with local stakeholders and communities for each SOWP sub-project. Each committee will meet on a quarterly basis and will be facilitated by MoMA SW Directorate with representatives from PIU management team, JSC directors, Site Managers (Landfills & TS). The likely constituents of the Liaison Committees will be the stakeholder group who may be directly or indirectly affected by the operations.

The primary function of the liaison committee is to provide regular and effective communication between the community and the PIU, sub-project contractors regarding the project operations.

The expected tasks of the SLC is:

1. To provide **technical and socio- economic update and keep local communities informed on the Project and other related activities and plans.**
2. To **inform local communities and other relevant stakeholders about grievance mechanism and procedures as detailed with this SEP**, and receive any grievance and complaints from local communities in accordance with the grievance procedure

The LCs shall be headed by related JCSs directors.

SOWP subprojects Liaison Committees Composition are the following:

- **JSC Representative of the related facility**; the representative will be as a **Liaison Officer** who shall also manage the **Grievance Procedure and facilitate the Liaison Committee meeting and agenda.**
- **Regional MoMA Directorate Representative (Governorate /district level),**
- **Site Manager** (Landfill).
- One or two members from a community group with interest in the environment
- One or two members from a community association
- **Operators of nearby facilities:** Electric Power Company, Nearby Agricultural Farms – including tree plantations, poultry and cattle farms, Nearby Factories within 5 km and Cattle Market etc.
- Representative of the Military Camps;

- Civil Defence Authority & Police Representatives;
- **Representatives of Waste Pickers**² - the inclusion of waste pickers in the Liaison Committee will be reviewed following development of a Livelihood Restoration Framework (LRF) and further investigation of their presence. Alternative engagement methods may be established, this will include consideration of their potentially vulnerability.

Figure 1 SOWP subprojects Liaison Committees

#	Liaison committees	Sub- Project area
1	Al Ekaider	Al Ekaider Sanitary Landfill (for new cells and rehabilitation of DS)
2	N-W transfer station	TS TBD
3	Al Huseyneyat	Al Huseyneyat Sanitary Landfill (for new cells and rehabilitation of DS)
4	N-E transfer station	TS TBD
5	AL aghwar Al Shamalyeh	AL aghwar Al Shamalyeh DS
6	Center Region Transfer station	TS TBD

8.2.2 SW Directorate – MoMA

The SW Directorate of MoMA, which is responsible for Waste Management, includes a section of Landfills and transfer stations. One of the objectives and missions of this **section** is **to raise public awareness³, change behaviour, and promote interest in conservation of the environment (in general) as well as solid waste management (recycling, reuse, segregation, etc.).**

*Engagement with those stakeholders who may be directly or indirectly affected by the Project and the operations. This will include public awareness and educational programmes on waste management. This will build on the current programmes in relation to recycling, reuse, segregation, etc. run by the section in MoMA and be focused on raising public awareness of the current volumes of waste going to the landfill and the need for recycling, reuse and segregation initiatives will become more important. SW directorate will work with the **Liaison Committees** and will update the MoMA website with updates on the Projects.*

8.2.3 Individual Meetings

Individual meetings will be undertaken by representatives from MoMA with several governmental entities – to include Ministry of Environment (MoEnv), Ministry of Water and Irrigation (MWI)/Water Authority of Jordan (WAJ), Ministry of Health (MoH), and Ministry of Labour (MoL),etc.

The objective of such meetings are mainly to review, agree, and implement the monitoring programmes related to Environment, Health, and Safety within the project (to include air quality, noise, water resources, and occupational health and safety).

8.2.4 Official Letters

In accordance with the above, all outcomes agreed through the individual meetings will be properly documented through official letters issued from MoMA to the various governmental entities and vice versa.

² Engagement will be required with individual waste pickers whose livelihoods are dependent on waste picking at the related site and have been identified to be accessing the site. A Livelihood Restoration Framework and **Livelihood Restoration Plan (LRP)** to provide for alternative livelihood options will be prepared (within GIZ's responsibility). The LRP will determine the mechanism for engagement with waste pickers.

³ There is a strong link to create with the component of GIZ intervention in SOWP related to awareness later

8.2.5 *Disclosure of Documents & Information*

MoMA as outlined in Section 7 will disclose documentation; this will serve as one method of communication.

8.3 STAKEHOLDER ENGAGEMENT ACTION PLAN

Table 5 contain identified stakeholders, the engagement actions and communication methods for SOWP subprojects respectively.

Table 5 SOWP Stakeholder Engagement Action Plan

Stakeholders	Stakeholder Engagement Actions	Expected timing	Communication Methods					
			Liaison Committees	Neighbourhood Committee/JSC	SW directorate MoMA	Individual Meetings	Official Letters	Disclosure of Documents
All	Disclosure of Stakeholder Engagement Plan (SEP) on MoMA website and deposit copies at site, PIU Head Office and related JSCs Office.	See the action plan for SOWP ⁴	-	Yes	-	-	-	Yes
All	Prepare simple Grievance Procedure document and deposit copies at site, landfills, Transfer stations, related JSC	See the action plan for SOWP	Yes	Yes	-	-	-	Yes
All	Update Stakeholder Engagement Plan (SEP) and disclose.	See the action plan for SOWP	Yes	Yes	Yes	-	-	Yes
Stakeholders who may be Directly or Indirectly Affected by the Project:								
Nearby local community – from related JSCs SW facilities	Establish sub-projects Liaison Committee and arrange meetings quarterly	See the action plan for SOWP	Yes	(Yes)	-	-	-	-
	Provide SEP to Liaison Committee.	See the action plan for SOWP	Yes	(Yes)	-	-	-	Yes
Nearby Agricultural Farms – including tree plantations, poultry and cattle farms etc.	Provide regular updates on project activities of interest to stakeholders and which could affect them. Include in updates information on Emergency Response Plans .	See the action plan for SOWP	Yes	(Yes)	Yes (via website updates)	-	-	Yes
Nearby Factories – 2 No. within 5 km range Cattle Market	Inform stakeholders about Grievance Procedure and distribute Grievance Procedure document to Liaison Committee.	See the action plan for SOWP	Yes	(Yes)	-	-	-	Yes

⁴ - Action plan for the SWOP will be ready by the PIU once the agreement is signed

Military Camp Waste Pickers ⁵								
Possibility to Influence and Make Decisions on Implementation of the Project:								
Ministry of Environment (MoEnv)	Review with the Ministry of Environment the ESIA and permitting/licensing requirements for the connection to the grid. (Also MoMA will liaise with MoEnv on the wider landfill permitting/licensing).	See the action plan for SOWP	-	-	-	Yes	Yes	-
	Review and discuss Project environmental monitoring programme and Monitoring Plan with the Ministry of Environment (including air quality, dust, odour, groundwater, leachate etc.)	See the action plan for SOWP	-	-	-	Yes	Yes	-
Ministry of Water and Irrigation (MWI)/Water authority of Jordan (WAJ)	Review and discuss Project groundwater quality monitoring programme with MWI/WAJ, including the location and installation of monitoring wells.	See the action plan for SOWP	-	-	-	Yes	Yes	-
	Liaise with WAJ and obtain updated information on wells in the vicinity of the landfills.	See the action plan for SOWP	-	-	-	Yes	Yes	-
Ministry of Health (MoH)	Review and discuss the implementation of an Occupational Health & Safety Plan, including worker medical surveillance and welfare facilities.	See the action plan for SOWP	-	-	-	Yes	Yes	-
Ministry of Labour (MoL)		See the action plan for SOWP	-	-	-	Yes	Yes	-

⁵ The inclusion of waste pickers in the Liaison Committee will be reviewed following preparation of LRP (Livelihood Restoration Plan). Alternative engagement methods may be established with waste pickers, this will include consideration of their potentially vulnerability (cf. GIZ involvement in SOWP).

9 DISCLOSURE OF PROJECT DOCUMENTATION

MoMA intends to provide all relevant information to stakeholders on the Projects activities. Certain documents and information will be disclosed to relevant stakeholders, as indicated in Tables 5 above. This includes: (i) regular updates on project activities (including on MoMA website) and (ii) disclosure of SEP.

(i) Updates on Project Activities

MoMA will coordinate and work with the **Liaison Committees** (and the relevant Neighbourhood Committees) to provide updates and keep local community and stakeholders informed on any issue which could affect them related to the Project and related activities at the landfill and transfer station. This is to be undertaken through the following:

- Leaflets/information in Arabic to be distributed to Liaison Committee; and
- Project updates will also be made on the MoMA Announcement Website

(ii) Disclosure of the Project Documentation

All interested and PAPs will be able to find the Stakeholder Engagement Plan (SEP) regarding SOWP Project and subject MoMA website:

The SEP will remain in the public domain for the duration of the Project and will be updated periodically. Hard copies of the SEP will be deposited at the MoMA-SW directorate Director Office and PIU Offices:

City: Amman

PO Box: 1977

Address

Jebal Amman, 3rd Circle, Zahran Street

Telephone: 4641393 6 (962) (22) line

ZIP Code: 11118

Website: <http://www.moma.gov.jo>

Fax: 4617138 6 (962)

Stakeholders, including the public, will be able to use the grievance procedure and information on this procedure will be disseminated. The Grievance Procedure will also be available on the MoMA website.

10 GRIEVANCE PROCEDURE

In order to minimize potential negative impacts from the project activity and to maximize positive ones, the **sub-project owners** should establish a **grievance mechanism** as part of the management system to ensure that proper consultation, disclosure and community engagement is included throughout the project life continuously.

A policy or process for addressing complaints cannot be effective if no one knows about it. The **sub-project owner's grievance procedures** shall be documented publicized and shall be clear to the relevant stakeholder groups. In addition, the mechanism shall be simple and the people shall know where to go and whom to talk to as well as to understand the process for handling this issue. Generally, the grievance mechanism shall not be complicated to use.

Management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders. Monitoring of grievances can signal any recurrent issues, or escalating conflicts and disputes.

The current procedure lacks a structured or systemic approach to managing grievances that also does not ensure that all affected stakeholders have access to such a procedure.

Discussed below is the approach **MoMA/The legal Dept.** will implement for grievance management going forwards in the SOWP.

In general, the grievances redress mechanism must be:

- Easy to understand for all stakeholders;
- Accessible for vulnerable people or groups without fear of reprisal;
- Easy and affordable to manage;
- Should be linked with the project design team and with the communication plan (SEP and ESMP).

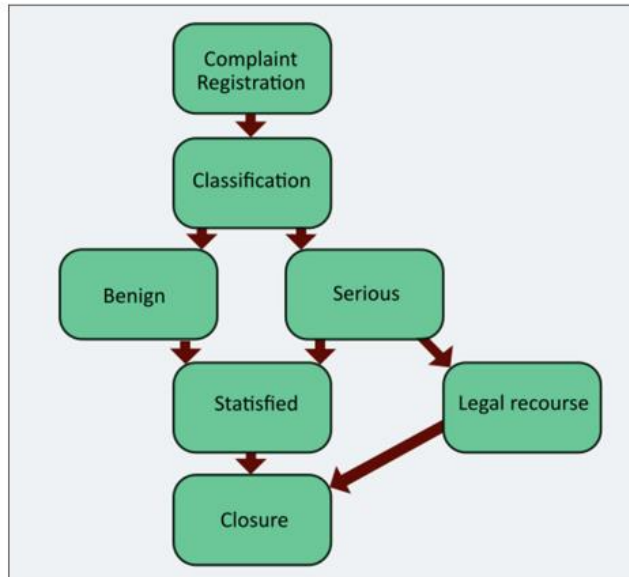
10.1 STAKEHOLDER ENGAGEMENT GRIEVANCE PROCEDURE

MoMA/PIU will implement a Grievance Procedure to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

The Grievance Procedure will be implemented by a MoMA/PIU Liaison Officer to be assigned by **MoMA SW directorate director** whom will be responsible **for facilitating the Liaison Committee**, handling and presenting all grievances received from the community **to the LCs** during the lifetime of the Project.

To take advantage of this experience for further projects to be conducted in Jordan, MoEnv must be involved in the registration, communication and complaint treatment processes, based on what is currently in place in Jordan. The grievance management scheme shown in table 6

Table 6 Grievance management scheme



Primarily, all grievances will be received through MoMA's dedicated landline and e-mail address for complaints as specified below.

- **MoMA Complaints Direct Line: 0797905646**
- MoMA Complaints E-mail Address: rushdi_87@yahoo.com

Complaints and issues can also be raised through related JSCs, the Liaison Committee.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. All grievances will be registered and acknowledged within **5 days** and responded to within 30 working days. Individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Jordan.

MoMA/PIU will monitor the way in which grievances are being handled by their **staff and Contractor(s)** and ensure they are properly addressed within deadlines specified above. MoMA/PIU/SWD will keep a grievance log of all grievances (including those received and addressed by the Contractor(s)).

The grievance procedure will be managed by a Liaison Officer and will be gender sensitive if required (i.e. a male and female liaison officer will be made available for managing complaints).

MoMA/PIU/SWD will ensure that there is an independent, objective appeal mechanism and shall inform the affected communities about the grievance process in the course of its community engagement activities, protecting the privacy of individuals.

The grievance redress mechanism will include:

- Process and responsibilities for registering a complain/grievance/request (who, where, specific form?).
 - Classification: each complaint will be classified according to its scale and its potential impact.
 - Treatment and communication: each complaint will require a communication to the complainant. Treatment will depend of its classification.
 - Delay: a minimum and maxim delay will be defined for each class of complaint in order to allow the proper analysis and response by the responsible department.
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- Implementation of remedial and corrective actions when necessary.
- Closure: grievance registered must be documented until their closure. The analysis of opened and closed grievances will be part of the evaluation process.

The grievance process will follow the following key steps:

- Lodging a grievance: Stakeholders willing to lodge a grievance will be able to do so at MoMA's dedicated complaints line and e-mail address.
- All grievances will be forwarded to the Liaison Officer whom will record all grievances on the Grievance Form and then collected in Grievance Record/Log which will be held at the MoMA's office.
- Grievance procedure starts with formal acknowledgment by the Liaison Officer through a personal meeting, phone call, or letter as appropriate, within 5 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.
- Based on notification from the Liaison Officer, a response to the complainant will be developed by the relevant individual from MoMA (e.g. JSC director, etc.) based on the required actions to be implemented to deal with the issue. Completion of these is recorded on the grievance record.
- The response to the complainant is signed-off by the Head of the SW Directorate. This sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance.
- The response to the complainant is recorded to help assess whether the grievance is closed or whether further action is needed.

10.2 SUMMARY OF WORKER GRIEVANCE PROCEDURE

Given there is a Local council department in MoMA engagement actions with employees and workers at the landfills and transfer stations are not included within the scope of the SEP. However, a summary of the Grievance Procedure available for workers is provided for completeness of the SEP.

A workers' grievance procedure is established for the employees of LFs, TSs, JCSs and their contractors as a separate system. The grievance procedure should guarantee confidentiality. Workers are given the possibility to lodge grievances through the following:

- Direct Manager of the employee;
- Local council Department at MoMA; or
- JSC director.

Anonymous lodging can also be made possible (via grievance boxes – one of which should be available on site at the sub-project offices). The Grievance Procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available. In particular all workers will be informed of the Grievance process and new workers will be informed when they join the Project. MoMA undertakes to ensure this is in place by April 15th 2018. .

11 RESPONSIBILITIES & REPORTING

The PIU in coordination with SW Directorate will be responsible for the implementation, monitoring and updating of the SEP. Senior Management authority for the SEP actions will be with the JSCs directors for the sub-project related to their jurisdiction. PIU director will be responsible for ensuring the following pre-requisites are in place to implement the SEP:

- Sufficient and suitable capacity development programme for PIU/SWD employees implementing the SEP;
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- Suitable and proper matching of technical background and capacity of PIU/SWD employees to the scope of the SEP;
- Stability of selected team in their positions in order to maintain the memory of the Project and SEP implementation, as well as the experience; and
- Implement a system for incentives to ensure successful implementation of the SOWP Project and SEP.

PIU&SWD directors will undertake quarterly reviews of the SEP implementation to ensure that the **MoMA's legal department** is implementing the SEP obligations (e.g. checking responses and logging of complaints etc.).

Contact details for the person in charge of SEP are provided below:

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