GREATER AMMAN MUNICIPALITY (GAM) GHABAWI MUNICIPAL SOLID WASTE LANDFILL STAKEHOLDER ENGAGEMENT PLAN



July 2019

FINAL DOCUMENT

REV # 2

Issue and Revision Record:

Version	Date	Description	Prepared by	Checked and Revised by
Rev 0	06 March 2019	First Draft	LZ / ECO Consult	FS / EBRD
				MA / GAM
Rev 1	22 June 2019	Second Draft	LZ / ECO Consult	FS / EBRD
				MA / GAM
Rev 2	28 July 2019	Third Draft	LZ / ECO Consult	FS / EBRD
				MA / GAM

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LIST OF ACRONYMS

AEPP

ASTPP	Amman Strategic Reserve Terminal for Petroleum Products
CBO	Community Based Organisation
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
DoS	Department of Statistics
EASEP	East Amman Society for Environment Protection
EBRD	European Bank for Reconstruction and Development
EMRC	Electricity and Mining Regulatory Commission
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
EU	European Union
GAM	Greater Amman Municipality
IUCN	International Union for Conservation of Nature
JEPCO	Jordan Electric Power Company
LFG	Landfill Gas
MEMR	Ministry of Energy and Mineral Resources
MoA	Ministry of Agriculture
MoENV	Ministry of Environment
MoH	Ministry of Health

Amman East Power Plant

MoL Ministry of Labour

MoMA Ministry of Municipal Affairs

MoT Ministry of Transport

MoTA Ministry of Tourism and Antiquities

MSW Municipal Solid Waste

MWI Ministry of Water and Irrigation
NEPCO National Electric Power Company
NGO Non-governmental Organisation

NTS Non-technical Summary
PR Performance Requirement

RSCN Royal Society for Conservation of Nature

SEP Stakeholder Engagement Plan WAJ Water Authority Jordan

1. INTRODUCTION

1.1 Objectives and Scope of the Stakeholder Engagement Plan

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by Greater Amman Municipality (GAM). This SEP outlines the approach and actions GAM will undertake for engagement with external stakeholders and local communities in connection with the different existing and planned components (or sub-projects) approved/financed to date by the European Bank for Reconstruction and Development (EBRD) in the Ghabawi Landfill as well as other components to be implemented during the whole lifetime of the Landfill that may be financed in the future by an International Financing Institution (IFI) (including the EBRD) or from GAM's own resources and budget.

This SEP was developed for GAM in order to clearly communicate to all interested and affected parties the stakeholder engagement programme which is to be implemented throughout the lifetime of the Ghabawi Landfill.

The objective of this SEP is to improve and facilitate decision-making in matters related to the Ghabawi Landfill, create opportunities for active involvement of all stakeholders in a timely manner, provide possibilities for all stakeholders to voice their opinions and concerns, and address community concerns with regard to key environmental and social risks through implementation of the stakeholder consultation and information disclosure activities.

The purpose of the SEP is, therefore, to enhance stakeholder engagement by GAM throughout the lifetime of the Ghabawi Landfill, and to carry out stakeholder engagement in line with the national requirements, international good practice, as well as the requirements of the EBRD and other IFIs that may be involved in the future.

The public will be able to access and review this SEP at the GAM head office in Amman and Uhud District office. This SEP will be updated as necessary.

For clarification purposes, the following terms are used in this SEP:

<u>Stakeholders</u> are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.

Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

<u>Stakeholder engagement</u> can be defined as any process that involves stakeholders in problem-solving or decision-making and uses stakeholder input to make better decisions.

Consultation process involves two-way communication between the project developing party or its representatives and local communities. The consultation process provides local communities with opportunities to express their views on project risks, impacts and mitigations measures, and in turn allows the project developer or its representatives to consider and respond to them.

1.2 GAM Services and Organisation

The Greater Amman Municipality (Amanat Amman Alkubra/أمانة عمان الكبرى) is the municipality (amanah) incorporating the metropolitan region of Amman, the capital of Jordan, and the bulk of the population of the larger Amman Governorate. Article 12 of the Municipalities Law No. 41/2015 empowers GAM to act as autonomous entity in managing municipal services within its boundaries. These services include the municipal cleaning, waste collection, and final disposal of waste from 22 city districts, spanning an area of around 800 km². GAM's role in managing municipal solid waste is complemented by the Ministry of Health (MOH) and the Ministry of Environment (MoEnv) who oversee the management of medical, hazardous and industrial waste respectively.

GAM is responsible for municipal solid waste management (MSWM) services within the metropolitan area of Amman. With a flow of an estimated average of 3,000 tonnes of solid municipal waste per day, GAM accounts for approximately 50 percent of Jordan's total municipal solid waste.

Within GAM, solid waste operations are carried out in two systems. The first is a decentralised system whereby each of GAM's 22 Districts manages cleaning and waste collection services in their jurisdictions

separately. This includes the coordination of personnel (e.g. drivers, waste collectors, street sweepers) and associated equipment every step in the way until waste is delivered to the waste transfer stations (WTS) – currently Shaer WTS.

The other is a centralised system administered by the Solid Waste Operations and Treatment Department which manages transfer stations, landfill operations, and to some extent inspects the performance of the collection and city cleaning made by the Districts. It should be noted that the Deputy City Manager for District Affairs and Environment is the highest executive authority directly managing all the 22 Districts together with Environmental Affairs and Solid Waste Directorate.

Currently, Al Shaer WTS serves as a critical link in making cost-effective transport of waste to the distant Ghabawi Landfill (approximately 23 km to the East). Administratively, Ghabawi Landfill and Al Shaer WTS sections (previously two separate departments) were recently (2018) integrated into one overarching 'Solid Waste Operations and Treatment Department' and linked directly with the Environmental Affairs and SWM Directorate as shown in Figure 1 below.



Figure 1: Organisation Chart Showing Ghabawi Lanfill and Al Shaer WTS within GAM (ECO Consult, 2018)

1.3 Ghabawi Landfill and the Local Context

1.3.1 Ghabawi Landfill Location and Surrounding Area

Ghabawi Landfill site covers an area of approximately 2 km² and is located within the Amman Governorate, specifically within the area managed under the jurisdiction of GAM. The Ghabawi Landfill site (31°55'44.0" N and 36°10'56.0" E) lays over a semi-flat area with general average slope of 1.4%, from South East to North West.

Ghabawi Landfill managed and operated by the Greater Amman Municipality (GAM) is located in Uhud District (Mantiqat Uhud/منطقة أحد) around 23 km from Amman in the Eastern semi-arid desert. It is located within the Sahab district according to the Ministry of Interior (MoI) divisions. Table 1 below provides general information about Uhud District and its population.

#	Item	Description				·	•	
1.	Area of Uhud	250 km ² which constitutes around 41% of the total area allocated under the jurisdiction of						
		GAM						
2.	Uhud Population (GAM, 2017)	47,000						
3.	Population Projections for	2016 2	2020	2025	2030	2035	2040	
	Uhud based on a (2.55%)	47,834	52,903	60,001	68,052	77,182	87,538	
	population increase (GAM,	'						
	2018)							
4.	Neighbourhoods in Uhud	Al-Abdaliya, Za	mlet Al	Alia, North	Khashafiyeh	/ Addabayb	eh, South I	Khashafiyeh /
	(GAM, 2018)	Ashawabkeh, M	lanakher, (Qa'four, Al Ba	yda, Rmeidan	, Madouneh		

Table 1: General Information about Uhud District and Its Population (ECO Consult, 2018)

Table 2 further clarifies the administrative setup for the area in the vicinity of the Ghabawi MSW Landfill as follows:

Table 2: Administrative and Municipal Setup in the Uhud District in Accordance with Mol and GAM Divisions (ECO Consult, 2018)

Tubic	able 2. Administrative and Municipal Setup in the Orda District in Accordance with Moralia GAM Divisions (200 consult, 2010)				
MOI	Governorate	Amman Governorate			
	District	Sahab District			
	Localities	Sahab, Al-Abdaliya, Zamlet Al Alia, North Khashafiyeh / Addabaybeh, South Khashafiyeh /			
		Ashawabkeh, Manakher, Qa'four			
	Municipalities within Sahab	Sahab Municipality / Managed by MOMA			
	District	Uhud Municipality / Managed by GAM / Ghabawi MSW Landfill located in Uhud			
GAM	Municipality	Greater Amman Municipality			
	GAM District	Uhud Municipality / Ghabawi MSW Landfill located in Uhud			

Uhud Neighbourhoods	Al-Abdaliya, Zamlet Al Alia, North Khashafiyeh / Addabaybeh, South Khashafiyeh /
	Ashawabkeh, Manakher, Qa'four, Al Bayda, Rmeidan, Madouneh

The Uhud District constitutes an area of around 41% of the total area allocated under the jurisdiction of GAM, has a population of 47,000 in 2017 according to GAM Master Plan records₁.

At its inception, the nearest local communities were around 9 km to the west with very low population density. At the time, the area was not served by road networks or any other services. Roads were opened after site was officially selected to serve the desert and uninhabited area. The only activity in the vicinity of the selected site was a dairy farm located at 2.5 km distance southwest from the site (which still exists) and the closest village was more than 9 km away.

As it still stands, there are no residential areas in the immediate vicinity of the Ghabawi Landfill. The closest residential area of Qa'four is around 7 km and Madouneh is located approximately 9 km northwest of the landfill site and occupied by industrial and commercial activity and consists of mostly vacant treasury-owned land parcels. Manakher has around 100 households and is located approximately 12 km away from the Ghabawi Landfill.

The table below indicates the neighbourhoods established by GAM within the Uhud District as well as their population.

Table 3: Population of 2015 in the Uhud District (GAM Master Plan, 2018)						
Neighbourhood	الأحياء	Distance From The Site	Total			
Al-Abdaliya	العبدلية	More than 10 km southwest	25,276			
Zamlet Al Alia	زملة العليا	10 km southwest	173			
North Khashafiyeh / Addabaybeh	الخشافية الشمالية / خشافية الدبايبة	10 km southwest	8,997			
South Khashafiyeh / Ashawabkeh	الخشافية الجنوبية / خشافية الشوابكة	12 km southwest	1,785			
Manakher	المناخر	12 km west	2,032			
Qa'four	قعفور	6.5 km south	1,035			
Al Bayda	البيضاء	10 km west	6,566			
Rmeidan	رمیدان	10 km southwest	415			
Madouneh	الماضونة	8 km northwest	357			
Total			46,636			

Currently, there are several existing and planned commercial/industrial/military/governmental developments in the vicinity of the Ghabawi Landfill and these as well as the location of the Ghabawi Landfill are illustrated in Figure 2 below.

Ghabawi Municipal Solid Waste (MSW) Landfill site coordinates are 31°55'44.0" N and 36°10'56.0" E, and the facility covers an area of approximately 2 km² (2,000 dunums²). The landfill was established on military lands, which were undeveloped and used for military expeditions and training which ownership was transferred to GAM. The main access to the site is via the external road from Amman, running to the east and turning to the north in its final stretch until reaching the landfill entrance. Another 2-lane road connects the Landfill with Zarqa.

Based on the current records of the Department of Land and Survey (DLS), the area surrounding the Ghabawi Landfill to the east, south, and north is mainly government owned land.

The soils around the Ghabawi Landfill area are considered as poor soils with very low organic content especially in the eastern and southern areas. This has been corroborated by seasonal livestock herders in the area and stakeholders who indicated that they were not successful in any agricultural activities or cultivation in the area to the east of the Landfill. The area to the west of the Landfill on the other hand has a better organic content and potential for irrigated agriculture.

Ghabawi Landfill is solely a MSW management facility and does not accept hazardous wastes or other substances. The waste composition received at the Ghabawi Landfill is mainly 50% organic waste, 16% plastics, 15% paper and cardboard, 8% textiles and napkins, 4% glass and metals, 1% compost material, 1%

¹ The Planning and GAM Master Plan Team records indicated that the population of the Uhud District in 2004 was 13,128 and based on the population reached in 2015; this indicates a population growth of 2.55 in this district.

² A dunum (دونم), it is equal to one decare (1000 m2), which is 1/10 hectare (1/10 * 10,000 m2)

hazardous waste, and 5% unclassified combustibles. The Ghabawi Landfill team implements waste acceptance criteria which lists accepted and rejected waste at the Landfill.

Under 2003/33/EU rule, Ghabawi landfill is considered a B3 class landfill which means it is considered as a Landfill for non-hazardous waste: Landfill for mixed non-hazardous waste with substantial contents of both organic / biodegradable waste and inorganic waste.

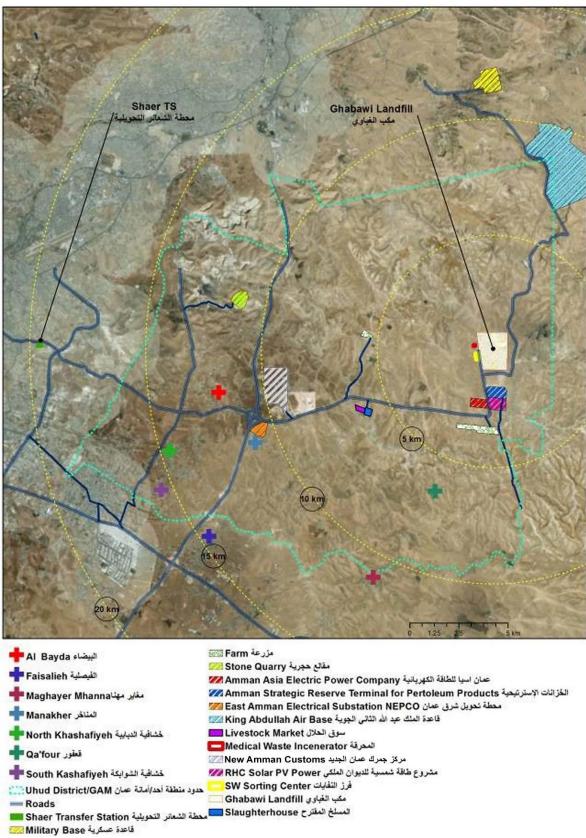


Figure 2: Location and Surrounding Communities and Activities (ECO Consult, 2018)

1.3.2 Current Waste Management Practices and Status of the Ghabawi Municipal Solid Waste Landfill

The GAM is responsible for undertaking all waste management operations including municipal cleaning, waste collection and final disposal of waste from 22 districts. GAM collects waste from the districts on a daily basis and this waste is generally taken to Shaer Waste Transfer Station and then transferred in enclosed compaction trucks to the Ghabawi MSW Landfill.

The Ghabawi landfill managed by GAM was designed in 2001 as an engineered landfill and based on nine (9) engineered lined cells to receive solid waste generated within the borders of GAM, in addition to other municipalities such as Russeifeh and Zarqa within a safe, environmentally sound, waste disposal system. The Landfill serves more than 50% of the population of Jordan.

This landfill started to receive municipal solid waste in 2003 and 3 cells have been competed in the first period of operations until 2014. These three cells occupy the north area of the site. Since 2014 until October 2018, waste has been disposed in the adjoining Cell 4. In October 2018 this cell was considered as completed and waste is disposed in Cell 5 since then.

Future development of the landfill is planned to happen southwards within the borders of the site, completing four new additional cells (numbered from 6 to 9). The lifetime span for the Ghabawi landfill is 17 years more, until 2035. This estimate is highly dependent on the future waste generation, population growth and waste management policies focused on recycling or energy recovery which should all be reflected in an updated Master Plan for Ghabawi Landfill to be prepared by GAM. It is still unclear when this updated Master Plan shall be ready but the timeline will be provided by GAM.

Currently the Ghabawi landfill site is comprised of:

- (3) three capped cells, including the installation of a landfill gas collection network;
- (1) one cell where waste disposal has been stopped and currently planning for capping and landfill gas extraction system being negotiated – Cell 4;
- (1) one newly constructed and operated cell Cell 5,
- (1) one administration building –and a new one under construction-,
- (1) one machinery maintenance and service workshop,
- (1) landfill gas extraction station and its corresponding flare,
- (1) landfill gas power plant -under construction,
- (8) eight leachate lagoons,
- (1) one access control and weighing check point,
- (1) one water well, and
- The site is surrounded by a concrete wall preventing the access of uncontrolled people to the landfill and security for the Landfill is provided by a resident police unit patrolling the site and its perimeter.

Future developments are planned in the landfill including the construction, operation, capping and closing of four new additional cells (cells 6-9). The lifetime span for the Ghabawi landfill is 17 years more, until 2035. This estimate is highly dependent on the future waste generation, population growth and waste management policies.

Once the landfill lifetime is finished (by 2035), it is necessary to continue the operation of the landfill gas and leachate management plants, as well as the monitoring activities for a period of time usually not less than 30 years.

This time frame is based on the following amounts of waste, considering a waste disposal (present) of 4,000 t/day of solid waste and to be increased progressively in the coming years.

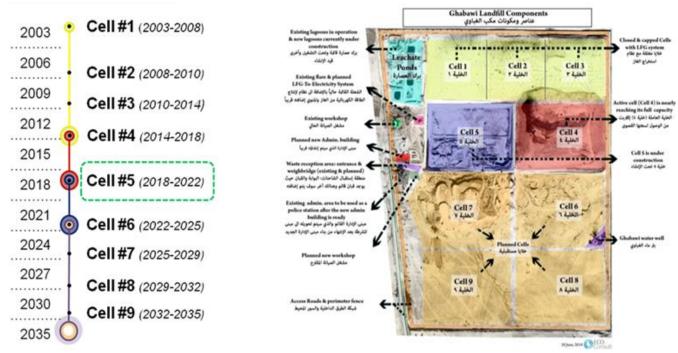


Figure 3: Planning and Operation Schedule for the Ghabawi Landfill (ECO Consult, 2018)

1.3.3 The planned components within the Ghabawi MSW Landfill

In summary, the planned project components in the Landfill include:

- Connection to the grid for power generated from cells 1, 2, and 3;
- Capping and LFG system for Cell 4 and connection to the grid;
- Construction, operation, and capping of Cells 5, 6, 7, 8, and 9;
- New administrative building;
- New leachate lagoons;
- New workshop; and
- LFG and electricity generation with connection to the grid.

1.3.4 Financing Setup and Requirements

The EBRD provided a sovereign loan to GAM that is designed to finance a series of investments aimed at addressing the City's urgent solid waste needs. This includes several investments within the Ghabawi Municipal Solid Waste Landfill including: 1) the landfill gas recovery programme; 2) purchasing of specialised solid waste equipment; 3) establishment of a maintenance workshop; 4) Design, tendering, and construction of the fifth cell and its associated leachate lagoons at Al Ghabawi landfill; 5) purchasing of 75 refuse collection vehicles and other equipment for use at Al-Ghabawi, Al Shaer WTS and in other solid waste operations in Amman; 6) Capping of Cell 4 and installing a landfill gas recovery system; and others. The loans were accompanied by grants from different entities.

In line with EBRD's Environmental and Social Policy (2014), the different components approved/financed to date by the EBRD in the Ghabawi Landfill have been categorised as Category B due to the following reasons: these components (or sub-projects) are located in a brownfield facility and the potential impacts are mostly site specific; environmental and social impacts (E&S) from landfills and LFG projects are well documented and well-known; the investments in relation to the Ghabawi MSW Landfill are only limited to the boundaries of the Ghabawi Landfill; and the components approved/financed to date bring in many E&S benefits including GHG emission reduction as well as enhancement of the Environment, Health, and Safety Management system in Ghabawi Landfill. If required and if additional investments are considered for the Ghabawi Landfill, the EBRD might reconsider the Project categorisation.

These project components outlined in section 1.3.3 are to be implemented by GAM as a number of sub-projects₃ executed over different phases and timelines as required.

The EBRD committed loans and grants covers only part of the components outlined above and not the entire developments within the Landfill. These components are to be implemented by GAM and financed by its own financial resources, through the EBRD, or any other International Financing Institution (IFI). Currently, there is no decision about this.

1.3.5 Overview of Project Phases and Activities

The typical life-cycle of a landfill starts from (i) site selection and planning phase, (ii) construction phase, (iii) operation phase, and (iv) closure phase. However, and In order for the Landfill to serve the waste disposal needs for an extended period of time, construction phase overlaps with operations phase as the need for new cells and supporting facilities arises.

The different components (or sub-projects) approved/financed to date by the EBRD in the Ghabawi Landfill are being developed as a brownfield project and hence the site selection phase has been concluded and the total Landfill area is provided.

Construction Phase

Typical construction activities for cells include the following:

Cell Construction

- A general excavation/embankments with grading, compaction, and sub-grade treatment to reach required levels, this will include two access ramps construction toward the new cell bottom area
- Geosynthetic materials supply and installation.
- Construction of the leachate drainage layer after the Geosynthetic Clay Liner (GCL), the High Density Polyethylene (HDPE) Geomembrane protected by the geotextile,
- Connection of the geosynthetics between the new cell with the existing adjoining cells of the landfill by applying the geosynthetic materials and a protection layer;
- Construction of the leachate transfer system (pumping / measuring / piping / earthworks), connecting to the leachate evaporation lagoons
- Related earthworks, civil, and electromechanical works, including the supply of the necessary equipment.

Cell Closure (Capping):

- To maximise the disposal volume within each cell, waste is shaped into a pile with an inclination of around 1:3.
- After a cell is filled, the final waste body has to be covered by a surface sealing system ("Cap"). This is important to physically separate the waste mass from the surrounding; avoid the dispersion of waste due to the action of wind; prevent the presence of insects, birds and rats; control and drainage of the biogas produced by anaerobic processes; and to minimize rainwater infiltration into the waste mass.
- A traditional final cap consists of the following: biogas drainage layer, low-permeability layer, drainage layer, protective layer, superficial natural layer with vegetation
- There are five (5) activities that need to be implemented for closure and rehabilitation of any cell: reshaping, repairing the lining system, connecting the lining with adjacent cells, and applying the final cover.

Typical activities during the planning and construction of other components may include:

Leachate evaporation lagoons:

³ The Project- is the Ghabawi Landfill in its entirety. The Sub-projects include the planned components within the Project (Ghabawi MSW Landfill) and these will be implemented at different timelines as required.

- Removal of the three of the existing (so-called) emergency leachate lagoons.
- General excavation/embankments with grading, compaction, and sub-grade treatment.
- Geosynthetic materials supply and installation
- Construction of the leachate connection pipes between the leachate lagoons (new / existing).
- Construction of the internal roads between the lagoons area.
- Related earthworks, civil, and electromechanical works, including the supply of the necessary
- Equipment.
- Buildings and workshop: those are the common construction activities which include site preparation (e.g. excavations, land clearing activities, etc.) and the subsequent installations and construction activities.
- Road network and building infrastructure. This may also include installation and laying of underground transmission cables, electrical transformers, temporary roads, and drainage network.

Operation Phase

Landfills normally require wide and complex activities within different areas and at different times. Those activities can be categorised based into five (5) areas as follows:

- Solid waste handling:
 - Weighing of trucks at the weighbridge (inbound /outbound).
 - Supervision and management of the tipping face by manage traffic, queuing of trucks, and allocation of tipping off area.
 - Inspection of Loads which may result in accepting/ rejecting loads.
 - Placement, spreading, and compaction of waste at the tipping face.
 - Daily Cover related activities (transferring soil, stockpiling, and spreading).
 - Dust Suppression and spraying of water.
 - Fuelling operations.
 - Trenching operations.
- LFG System
 - Gas collection operations: drilling and installing vertical LFG wells to withdraw methane (including casing, piping gravel packing and bentonite plugs to variable depths and connect well head, etc.)
 - Gas moisture removal and cooling.
 - Gas Flaring (receiving dry cool Gas and combusting using high temperature flare).
 - Gas Engine (operation of three 1.3 MW gas engines, use of oil/fuel tanks to support operation, use of small compressor to operate the gas engines, etc.)
 - Gas monitoring (measure and record the undisturbed probe pressure/vacuum, leak check the entire sample train, and surface emission and ambient air sampling).
- Leachate management: different activities to manage leachate (suction, pumping, ensuring leachate management system is functional, etc.)
- Workshop: different maintenance operations (inspections and mechanical repairs, Oil and Air Filter change, charging batteries, welding, etc.)
- Management: day-to-day activities to run the landfill operations (record keeping, staff care, medical care, outreach and community engagement, emergency response services, etc.)

Decommissioning, Closure, and Aftercare

Once a landfill is closed, the owner/operator has different responsibilities, such as:

- Maintaining the integrity of the landfill cap.
- Making repairs as needed to the cap.
- Monitoring water quality, settlement, and Methane generation.
- Maintaining the gas control, leachate collection, and storm water systems.

1.3.6 Project Benefits

The key benefits of the Project are:

- Contributing to Jordan's green developments and act as a very good example for proper landfilling of waste.
- Reduction of greenhouse gas (GHG) emissions from LFG emission from the existing and planned cells within the Landfill. The GHG assessment has estimated that 10,688,009 tonnes CO2 equivalent of emissions reduction would be produced during the Landfill operation from 2019 up to the closure of the Landfill cells in 2035 in addition to a 14,423,626 tonnes CO2 equivalent of emissions reduction during the closure of the Landfill and aftercare up to 2075, which results in a total of 25,111,635 tonnes CO2 equivalent of emissions reduction during the Ghabawi Landfill project lifetime, between 2019 and 2075.
- Improvement in environmental and health management and compliance at the Landfill including possible improvements in the treatment of leachate. Nearly 50% of the population of Jordan will benefit from improved waste management.
- Fulfilment of strategic and operational objectives defined in the waste management strategies and plans at the national and GAM levels.
- There will be a general improvement in environmental, public health, and occupational health and safety management of the area and the Landfill.
- Control of emissions and discharges (odour, dust, leachate infiltration) in landfill areas operated by GAM.

1.3.7 Key Impacts and Risks

There are no communities within the immediate vicinity of the Ghabawi landfill, thus no direct significant social effects are anticipated on the surrounding communities. However, there are potential environmental and social risks associated with the landfill as described below:

- Community nuisance associated with wastes accidentally dumped from open trucks on the main road and from the wind-blown plastic bags found in the vicinity of the Landfill (especially downwind) and these may be consumed by the sheep and goats and may result in health issues;
- Lack of stakeholder and community engagement activities;
- Local unemployment, and other social issues such as child labour, resulting from limited employment in the area;
- Poor occupational health and safety of workers potentially leading to increased illnesses and accidents (fire, slips and falls);
- Poor landfill gas management resulting in health risks and environmental pollution (air, odour)
- Lack of management of leachate resulting in health risks, land and associated groundwater contamination

2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

2.1 Local Legislation Requirements

Stakeholder engagement in Jordan is connected to the preparation of an Environmental and Social Impact Assessment (ESIA) and is a requirement of the "Environmental Impact Assessment (EIA) Regulation No. (37) of 2005" governed and implemented by the MoEnv.

For those projects which require an ESIA (as the case for the different developments or sub-projects within the Ghabawi Landfill), the Regulation requires a scoping session with potentially affected stakeholders at the onset of the ESIA, in order to provide stakeholders with 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 MoEnv deems appropriate and is dealt with on a case by case basis – taking into account the type and nature of the project development. A decision to disclose the ESIA to the public and stakeholders has not been made by the Ministry.

2.2 Financing Requirements

The different components approved/financed to date by the EBRD in the Ghabawi Landfill have been categorised as Category B project under EBRD's Environmental & Social Policy 2014 (and has been assessed against the EBRD Performance Requirements (PRs) contained within the policy.

The EBRD has approved or is considering financing specific components within the Ghabawi Landfill and corresponding loan agreements have been signed. Other components are planned during the whole lifetime of the Landfill that may be financed in the future by an IFI (including the EBRD) or from GAM's own resources and budget.

At least within the timeframe of the loan agreement signed between GAM and the EBRD, the requirements for stakeholder engagement and public consultation as specified in the EBRD Environmental and Social Policy of 2014, its Public Information Policy, and Performance Requirements (PRs) shall be met.

EBRD's PR10 (Information Disclosure and Stakeholder Engagement) sets out the following requirements of stakeholder engagement during project preparation:

- Identify the various individuals or groups i) who are affected or likely to be affected by the project; or ii)
 may have an interest in the project;
- Identify individuals and groups that may be differentially or disproportionally affected by the project because of their disadvantaged or vulnerable status. The project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity;
- Disclose relevant project information to affected stakeholders; information needs to be accessible and culturally appropriate;
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language; and
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances (through a prepared Stakeholder Engagement Plan / SEP).

In accordance with PR 10, projects are required to develop and implement a SEP appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

2.3 Environmental permitting and compliance requirements

GAM is required to comply with Jordanian regulations and ensure obtaining an environmental permit in line with the Ministry of Environment (MoEnv) regulations. As per discussion with the MoEnv, a comprehensive

Environmental and Social Impact Assessment (ESIA) is required as a condition for the environmental permitting process for different existing and planned components (or sub-projects) approved/financed to date by the EBRD in the Ghabawi Landfill as well as other components to be implemented during the whole lifetime of the Landfill that may be financed in the future by an IFI (including the EBRD) or from GAM's own resources and budget. The ESIA was carried out in accordance with:

- Applicable local, national and regional requirements;
- The EBRD's Environmental and Social Policy (ESP) 2014 (and the incorporated Performance Requirements (PRs)), and relevant European Union (EU) requirements; and
- Relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation.

The requirements for stakeholder engagement and public consultation shall be implemented as specified in the EBRD ESP 2014, its Public Information Policy and PRs.

3 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT

Stakeholder engagement activities conducted to date in relation to the Ghabawi MSW Landfill involved public hearings held in line with national environmental permitting requirements.

The Ministry of Environment was not established at the time of the site selection of the Ghabawi landfill in 1999 and the ESIA including the consultation process was not required at the time for such projects.

The Ghabawi landfill site was selected in 1999 after a thorough site selection investigations were carried out by a Technical Committee formed by GAM that included representatives from different Government entities. Consultation was undertaken in August 1999 involving representatives from central and local government entities, research and academia, and some Non-Government Organisations (NGOs). It is not clear whether local community representatives attended the session.

An Environmental and Social Impact Assessment (ESIA) was prepared in 2008 based on the World Bank (WB) financing requirements as well as MoEnv procedure for similar projects. In accordance with Jordanian legislative requirements, contained within the "EIA Regulation No. (37) of 2005", and financing requirements, stakeholder engagement activities were organised during the Project ESIA and these are summarised in the table below.

Table 4: Summary of Previous Stakeholder Engagement Activities – Ghabawi Landfill

Date	Engagement	Summary of Stakeholder Engagement Activities:
	Activity	
5	ESIA Scoping	The various stakeholder groups were identified by the ESIA Team in coordination with the Ministry of
February	Session	Environment. The stakeholders were provided with a draft TOR/Scoping Report after which a scoping
2008		session was held in Amman. During the scoping session, the Project was introduced and various
		components explained. The proposed methodology for the ESIA was outlined and anticipated impacts
		throughout the Project's phases were discussed. Stakeholders were invited to participate in the
		scoping of environmental impacts into the ESIA. The main issues raised by stakeholders related to:
		Surface and groundwater quality;
		■ Soil;
		Ambient air quality;
		Biodiversity; and
		Public health.
		A Scoping Report was submitted to the Ministry of Environment after the session which included the
		main outcomes and deliberations from the Scoping Session.
12 June	ESIA Disclosure	The Executive Summary of the Draft ESIA Report in Arabic was distributed to the various stakeholders
2008	Session	invited to the Disclosure Session for their review. The various stakeholder groups were invited once
		again to a disclosure session held in Amman with the objective of presenting the main findings and
		recommendations included in the ESIA study for them to provide feedback. The key comments that
		were raised throughout the session are summarised below. Throughout the session, it was explained
		how those issues have been addressed throughout the ESIA study.
		Public health and impacts on local communities; and
		Groundwater quality.
June 2008	Disclosure of	Copies of the full Final ESIA report were made available at the Ministry of the Environment, the World
	ESIA Studies	Bank website and the Greater Amman Municipality websites for the general public.

Two SEPs were prepared in subsequent years as part of the Environmental and Social Due Diligence (ESDD) undertaken for the different phases and components of the Project; the first SEP was developed in 2015, which outlined the approach and actions that GAM must undertake for engagement with external stakeholders and local communities. The SEP included a grievance mechanism for stakeholders to raise their concerns about the Landfill. The SEP was updated in 2017 to ensure implementation of the stakeholder consultation and information disclosure activities.

Due to institutional and capacity issues and deficiencies, unclear and disbursed responsibilities, absence of liable person(s)/departments to follow up on SEP actions, GAM has not undertaken any stakeholder consultations with the surrounding communities in response to the 2015 and 2017 SEPs. The only form of consultation is through a local community representative from Uhud District. He attends the bi-weekly meetings at GAM city hall to raise community concerns and grievances.

4 SUMMARY OF GRIEVANCES RECEIVED FROM STAKEHOLDERS

Several grievances have been received from stakeholders and community representative(s) mainly related to the LFG Project but also in relation to the Ghabawi Landfill. These grievances have been submitted to the Project Complaint Mechanism (PCM) through which stakeholders can submit complains and grievances regarding EBRD financed projects directly to the bank rather than the project owner. Complaints from stakeholders were submitted to both GAM and EBRD on different occasions over the last two years. The last complaint was submitted to EBRD through its PCM in September, 2018. This complaint was against the LFG Recovery Project (capping of cells 1, 3 with connection to LFG system and existing flare, and connection of cells 1, 2, and 3 to energy generators to produce electricity with connection to the grid). Several meetings and discussions took place between related parties (EBRD, GAM, and complainant) in order to discuss the grievances and find ways to resolve the issues. Below is a list of the main grievances submitted in relation to the Ghabawi Landfill:

- Project should be categorised as category A, not B⁴.
- GAM should take required measures to minimise, mitigate and compensate for adverse social and environmental impacts of the Ghabawi Landfill.
- The environmental and social appraisal and monitoring processes for the Ghabawi Landfill should be done
 by a neutral and accredited party not commissioned by the EBRD or GAM with involvement of
 complainant's real representatives.
- Failure to identify stakeholders and affected communities as well as lack of stakeholder engagement and disclosure of information.
- Due to the presence of different development projects in the Uhud District area, a strategic EIA shall be conducted to include cumulative impacts.
- Health impacts due to emissions from the LFG facility at the Landfill
- GAM is required to take measures (pollution control equipment, minimize Hazardous waste...) to avoid or minimise adverse impacts on human health caused by pollution arising from the project.
- GAM is required to publish the assessment of baseline GHG emissions and an estimate of post implementation GHG emissions
- Absence of information regarding LFG and GHG emissions from the Landfill.
- Lack of environmental monitoring and measurements at the Landfill and absence of published results
- Absence of a grievance mechanism or lack of disclosure of the grievance process to the community
- Absence of stakeholder liaison committees and public awareness programmes on waste management
- Local affected communities and stakeholders (complainants) deserve a livelihood restoration plan "LRP" as
 they have suffered from an economic displacement as they lost their income sources and means of
 livelihood from raising livestock, cultivation of their land, livestock grazing, loss of pastures and severe

⁴ In accordance with the EBRD's Environmental and Social Policy (2014) (ESP), the EBRD categorises each project to determine the nature and level of E&S investigations, information disclosure and stakeholder engagement required. EBRD categorises each directly financed project either as A, B or C, in accordance with sections 23 to 26 and Appendix 2 of the ESP. This is commensurate with the nature, location, sensitivity and scale of the project, and the significance of its potential adverse future environmental and social impacts.

This Project has been categorised by the EBRD as a Category B Project. Thus, an ESDD has been requested in 2014 which verified and confirmed Project categorisation.

degraded value of their lands as a result of the Ghabawi Landfill and other neighbouring projects in order to help them improve or restore their standards of living or livelihoods and to compensate them for their loss of the only income and providing fair and appropriate compensation and other incentives or benefits.

 GAM is required to disclose the project's LRF information to the local affected communities and stakeholders.

GAM's recent actions to resolve these grievances are summarised is Section 7.

5 IDENTIFICATION OF STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will be identified during different stages of the project. A systematic approach is used to map the stakeholders based on the project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

In order to identify relevant stakeholder groups, the consultant undertook the following: 1. review of the project plans, components, designs, and boundaries; 2. review of the impact zones of the project and the local/regional environmental and social potential impacts; 3. the existing environmental and social baseline within the area of influence of the Project; 4. identifying the broad impact zones for each of these components (e.g., the area of land take, air and water pollution receptors, etc.); 5. review of relevant national, regional, and area specific stakeholder groups and triangulating with the area of influence and anticipated environmental and social issues; and 6. consultation with relevant stakeholder representatives and verifying which groups are potentially affected by which impacts.

The Project footprint and area of influence will not involve involuntary resettlement, land acquisition or expropriation (of property and land). Therefore, no private landowners have been identified as 'Impacted Stakeholders'.

As a result of the stakeholder mapping, project key stakeholders identified are presented in the following table.

Table 5: Identified Groups of Stakeholders (ECO Consult, 2019)

Level of Stakeholder interest in/involvement to the Project

1. Stakeholders who may be directly or indirectly affected by the Project

- Selected relevant neighbourhoods in Uhud District
 - North Khashafiyeh / Addabaybeh, South Khashafiyeh / Ashawabkeh, Manakher, Qa'four, Al Bayda, and Madouneh
- Community Based Organisations (e.g.: East Amman Society For Environmental Protection (EASEP), Raboua Al Manakher Charity
 Association, Al Bayda Charitable Association, Maghayer Mhanna Charitable Society, East Amman Charitable Society, Sewar
 Charitable Association, and Khashafiyeh Addabaybeh Charitable Society)
- Livestock herders and grazers
- Youth and unemployed;
- Woman and children groups;
- Local academic institutions;
- Existing and planned commercial/industrial/military/governmental developments in the vicinity of the Ghabawi Landfill; Independent Amman East Power Plant (AEPP) IPP1, Amman Asia Electric Power Company (IPP3), Levant Power Plant (IPP4), King Abdullah II air base, Elayyan Cow Farm, Chicken fodder factory, Amman Strategic Reserve Terminal for Petroleum Products (ASTPP), Military Camp, Tadweer Waste Sorting Facility, Medical Waste Incinerator, and Amman Custom Centre

2. Stakeholders who may Participate in Implementation of the Project

- Project Shareholders: GAM Employees, GAM Management, The Mayor
- Investor/Lender
- LFG Operator and Contractors/Service Providers within the Landfill, Consultants, Subcontractors, ...etc
- 3. Stakeholders who have a regulatory role in ensuring the implementation and compliance of projects (Secondary Interested Parties/Stakeholders)

Central Government

- Ministry of Environment (MoEnv). Official governmental entity responsible for protection of the environment in Jordan. Responsible
 for granting environmental clearance of Project and ensuring implementation of environmental protection measures related to the
 Project.
- Ministry of Agriculture (MoA). Official body responsible for managing rangelands and forest as well as protecting and managing wildlife. For this project, MoA is also responsible for ensuring proper management of impacts on biodiversity.

- Ministry of Labour (MoL). Official body responsible for the labour sector in Jordan mandated to achieve the objectives related to employers and workers in Jordan including but not limited to overseeing the affairs of employers and workers, occupational health and safety, contribute to the organization of the Jordanian labour market, employ Jordanians locally and abroad, etc.
- Ministry of Municipal Affairs (MoMA). Official body responsible for setting and designating land uses in Jordan (except for areas under the authority of GAM and other special zones) which identifies certain activities and projects which are to be allowed. For this Project MoMA may be consulted in relation to activities in areas adjacent to the Ghabawi Landfill that are outside the jurisdiction and management of GAM, f required.
- Ministry of Energy and Mineral Resources (MEMR). Overall regulator for the development of the energy projects in Jordan.
- Ministry of Health (MoH). Official body responsible for the health sector in Jordan, including public health and safety. For this Project this mainly includes issues related to the public health of nearby communities and nuisance prevention from the Project to include waste management, wastewater management, etc.
- Ministry of Public Works and Housing (MPWH). Governmental authority responsible for the construction and development of the public road network in Jordan. For this Project, MPWH is involved in ensuring transportation activities are properly managed.
- Ministry of Water and Irrigation (MWI)/Water Authority of Jordan (WAJ). Official governmental entity responsible for the overall monitoring of the water sector, water supply and provisions of wastewater services. For this project this includes issue such as water supply and wastewater disposal, and protection of groundwater resources.
- Ministry of Tourism and Antiquities (MoTA). Official body responsible for tourism development and protection of antiquities in Jordan. For this project, this mainly includes potential impacts related to archaeology and cultural heritage related to the Project, if any.
- Social Security Corporation (SSC). Registration of employees in the social security system and regulating occupational health and safety as well as procedures for work injuries.
- Jordan Institute for Standards and Metrology (JISM). Responsible for issuing standards in Jordan including those related to environmental issues such as drinking water standards, ambient air quality standards, and other.
- Jordan Contractors Association (JCA). Involved in registering contractors to the Project and providing them with vocational licenses
 to work (international contractors should register with JCA to work in Jordan as well).
- Department of Antiquities (DoA). Official governmental entity responsible for protection of archaeology and cultural heritage resources in Jordan.
- The General Directorate of Jordan Civil Defence. Involved in approving technical designs and drawings and undertaking inspections during construction and operation and ensuring proper emergency procedures and fire fighting and control.

Local Governmental Agencies

- Local Governorate / Sahab District Office Official governmental body in Local District responsible for key government and administrative services. For this Project they may be involved in stakeholder and community engagement activities in relation to the Project and adjacent developments and other as appropriate.
- Local Uhud District Office. Official governmental municipal body responsible for providing infrastructure and utility services such as waste collection. Should also be involved socio-economic development from the Project (job opportunities, local contracting works, and other as appropriate)

Non-Governmental Organizations (NGOs) and Other Organisations – listed below are the key environmental and social development NGOS in Jordan. Such entities could be interested in updates on environmental and social implementation of the Project.

- Jordan Environment Society
- Friends of Environment Society
- National Environment and Wild Life Society
- The Jordan Society for Sustainable Development
- EDAMA
- Environmental Societies Association
- Jordan Green Building Council
- Energy Conservation and Environmental Sustainability Society
- Renewable Energy and Environment Investment Society
- Jordan River Foundation
- Jordanian Hashemite Fund for Human Development
- Royal Society for conservation of Nature (RSCN)

6 RECENT STAKEHOLDER ENGAGEMENT ACTIVITIES

This Section discusses in summary the stakeholder consultation and engagement activities which were undertaken as part of the ESIA process undertaken for the Ghabawi Landfill Project during the year 2018 and provides an overview of the findings.

A number of stakeholder engagement activities were undertaken throughout the study period which included national and governmental organisations, GAM, NGOs, and local community representatives.

Table 6: Summary of Recent Stakeholder Engagement Activities (ECO Consult, 2018)

Meeting/Consultation	Date	Objective
Scoping Session/public hearing	5 July 2018	■ Held for the purpose of providing consultation with the stakeholders and
		community representatives on the ESIA being prepared for the Project. It

		provided individuals, organisations, and agencies the opportunity to raise concerns about the environmental and social effects of the project.
Visit to cow farm	13 Aug 2018	The purpose of this visit was to have a general discussion on the ESIA and the feedback regarding the Landfill. During the meeting, the ESIA Team was given a tour around the facility showing the different operations and activities taking place within the boundary of the cow farm.
Several unilateral meetings with community representatives	12 Sep 2018	 Several individual interviews were conducted with a group of stakeholders including GAM, Al Ghabawi Landfill, Health Centre in Khashafiyeh Ad- Dabaybeh, GAM Library and a number of local community members
	13 Sep 2018 30 sep 2018	■ Field visits to the area and discussions with different stakeholders on the ground to collect different information and understand the socio-economic background in the project area
	29 Sep 2-18	 Individual interviews were conducted with local community members to get holistic information on areas around the landfill
	5 Oct 2018	 Phone interviews with official entities to collect information on health centres and schools Field visits to the area and discussion with different stakeholders on the ground to collect different information and understand the socio-economic background in the project area
	6 Oct 2018	 Phone interviews were conducted with local community members to get holistic information on areas around the landfill
Meeting with Mohammad Qudah, Health, Safety and Environment (HSE) manager-Amman East Power Plant	6/9/2018	■ The aim of the meeting was to discuss the role of AES Jordan in community engagement and social responsibility in Al-Manakher village in the past years and the recent involvement of the International Union for Conservation of Nature (IUCN), and the Corporate Social Responsibility(CSR) Programme AES Jordan has implemented
Data collection session and focus group discussions	15/9/2018	■ The objective was to collect information on the socio-economic situation in areas around Ghabawi Landfill, especially those related to the ESIA study. The session included a brief questionnaire, focus group discussions including filling out detailed questionnaires covering 10 socio-economic sectors, and carrying out open discussion in which, the attendees were given the chance to suggest ways and methods to help enhance the ESIA study
Meeting with livestock herders	25/9/2018	 Discussion on the area and general social and economic situation, land use, migration pattern, income, child schooling, health services and environmental and economic problems that the areas face
Meeting with local community representatives	15/10/2018	The meeting was held with request of some community members to discuss their concerns that are related to Al Ghabawi project and its social and environmental impacts

The community raised several concerns regarding the Landfill and GAM.



Figure 4: Selected Photos from Consultation with the Local Stakeholders (ECO Consult, 2018)

In addition to the above, other consultations with different governmental entities were implemented. Such stakeholder groups were engaged and consulted through one or more of the following communication protocols: (i) bi-lateral meetings, (ii) e-mail communication, (iii) phone communication, and (iv) formal letters. These are summarised in the table below.

Table 7: List of Other Consultations during the ESIA (ECO Consult, 2018)

Entity	Attribute	Objective of Consultation
MoEnv	■ General	Ongoing discussions on the ESIA process as well as general concerns and impacts from Project development.
MoA	Land Use	Current and future land use planning in relation to agriculture.Grazing Areas and Reserves
GAM and Uhud District	Land UseSocio-economic	Current and future land use planning in Project area as set by MoMA.Socioeconomic information
MOMA	Infrastructure and Utilities	Urban planning in the areaCollection of information on existing infrastructure element in the area
WAJ	Geology andHydrology	 Collection of secondary data on site geology and hydrology
	Infrastructureand Utilities	 Collection of secondary data on infrastructure and utilities related to water resources and networks, wastewater networks and treatment plants, etc.
DOA	Archaeologyand CulturalHeritage	 Collection of any available secondary on archaeological resources on the area.
RSCN	Land Use	 Current and future land use planning in relation to areas of critical Environmental concern.
DOS	Socio-economic	 Statistics and information about the area
Local Governor	Socio-economic Consultation activities Future stakeholder engagement	 Socioeconomic information Mapping and profiling of stakeholders Invitation of consultation sessions Discussion regarding needs in the area Discussion regarding future consultation

7 GAM RECENT ACTIONS TO RESOLVE COMMUNITY GRIEVANCES AND COMMENTS

Recently, GAM has been demonstrating more commitment towards implementing the SEP requirements and actions and has undertaken incremental steps in response to the stakeholder engagement commitments. The list below includes the main actions:

- GAM has been working with the Environmental and Social Implementation Support and Supervision Consultant to prepare and implement a proper environment, health, safety, and social (EHSS) management system for the Landfill in accordance with international standards and requirements which includes different manuals and procedures to enhance EHSS management and protection on the Landfill and within the surrounding communities. As part of this management system, a grievance procedure and a Stakeholder Engagement Plan (SEP) document has been prepared.
- GAM has undertaken several steps and activities in order to close out many of the actions outlined by the EBRD in the Environmental and Social Action Plan (ESAP) signed as part of the loan agreement between EBRD and GAM which ultimately target resolving EHSS issues.
- GAM commissioned a consultant to prepare an Environmental and Social Impact Assessment (ESIA) for the Landfill and obtained the environmental approval from the MoEnv and as part of this study, different measurement campaigns have been implemented to include groundwater, air quality, leachate quality, and soil quality. GAM is currently planning for a second measurement campaign in accordance with the ESIA requirements. This SEP is prepared and updated based on the findings and results of this ESIA.
- GAM held several internal meetings involving different departments involved directly or indirectly in stakeholder engagement actions in relation to the Ghabawi Landfill to draft and agree on action plan and measures for the implementation of the SEP.
- GAM has assigned a Community Liaison Officer (CLO) in order to act as main point of contact for the project with local communities and stakeholders on all project-related issues (i.e. representative of project in front of local communities).
- Meeting with the Sahab Governor in order to discuss establishment of the Ghabawi Landfill Site Public Liaison Committee (PLC), its mandate, members, and scope of work. According to agreement with the Governor, it has been decided to form the committee headed by the elected local community representative from Uhud District with the following members: Manager of the Uhud District, Member of decentralisation committee, East Amman Society For Environmental Protection (EASEP), local community and clan representatives, GAM CLO, Head of the Environmental Protection Section in the Uhud District. An

official decision was issued by GAM to this effect. The CLO is currently arranging to hold the first meeting for the PLC.

- GAM has prepared a community awareness plan that aims to meet with the different stakeholder groups to raise capacity and knowledge of solid waste and EHSS management.
- GAM headed and managed several meetings with community representatives to discuss and agree on means to resolve grievances submitted to the PCM in relation to issues and concerns at the Ghabawi Landfill.
- Several meetings and disclosure sessions are planned and GAM shall provide updates to the different stakeholder groups on the status of the Ghabawi Landfill and the EHSS management onsite.

8 FUTURE STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN AND RESPONSIBILITIES

This Section identifies the future stakeholder consultation and engagement plans which are to take place by the Developer (GAM) throughout the lifetime of the Project.

8.1 Future Stakeholder Engagement and Consultations during Different Phases

Depending on the nature and scale of the developments planned for the Ghabawi Landfill, stakeholder engagement may be relevant to the performance of a range of departments and functions within GAM and should be integrated into existing systems, including health and safety, environmental management, procurement and contractor management, logistics management, site or Landfill inspections and audits, external communications, security considerations, and project risk management.

The most important engagement activities during planning, decision making, construction, and operation of the different planned components (or sub-projects) within the Ghabawi Landfill are outlined below.

- Revise list of stakeholders most likely to be affected by construction and/or operation.
- Periodically review and update stakeholder information.
- Notify local stakeholders of planning, decision making, construction, and operation activities and changes to schedules.
- Manage the transition from construction to operations as well as parallel undertaking of both phases.
- Get community liaison staff on the ground quickly.
- Consider ways to assess stakeholder perceptions.
- Aim for rapid response times in resolving grievances.
- Report to stakeholders on progress of environmental and social management programmes.
- Continue to disclose, consult, and report to stakeholders as needed.
- Choose contractors/service providers with the capacity to engage effectively with stakeholders.
- Manage risks to stakeholder relations from contractors/service providers.
- Ensure integration of ongoing stakeholder commitments into operations management systems and EHS management system.
- Communicate emergency preparedness and response plans on a regular basis.
- Keep GAM grievance mechanism operational.
- Establish and maintain a participatory or third-party monitoring programme.
- For controversial projects, if any, consider establishing an independent monitoring panel.

In order to meet these objectives a number of key activities will be undertaken as a minimum:

• Inform the stakeholders of the existence of a 'Community Engagement' team and CLO, providing their Contact Details and mechanisms to contact them.

- Ensure continuity of community liaison staff or sufficient handover period.
- Design engagements to manage stakeholder expectations around the transition to operation and the parallel undertaking of construction and operation activities.
- Regular update of the stakeholder register and stakeholder risk analysis, adapted to necessities of the Project.
- Regularly engage and inform stakeholders of planning, decision making, construction, and operation activities and schedule of the activities.
- Continue Regular Engagements and information distribution.
- Receive, track and respond to grievances.
- Monitorize the implementation of the Stakeholder Engagement activities and progress
- Regular update of the stakeholder register and stakeholder risk analysis, adapted to necessities of the Project.
- Continue documenting engagements and responding to grievances.

8.2 Roles and Responsibilities for SEP Implementation

GAM will act as the main responsible party for the implementation of the SEP activities and shall ensure compliance and satisfactory delivery of services by the contractor(s) and service provider(s).

Where needed, Community Relations activities regarding Contractor(s) and service provider(s) are required, they will be conducted through collaboration between GAM and the Contractor(s)/service provider(s).

8.2.1 GAM Responsibilities

- GAM shall create a 'Government and Community Relations' team directly managed and supervised by the CLO who will lead the SEP implementation.
- GAM 'Government and Community Relations' team lead by the CLO will provide adequate and timely
 information to the stakeholders about community relations programmes and adequately consolidated
 information provided by other departments from GAM and Contractor(s)/service provider(s).
- GAM 'Government and Community Relations' team lead by the CLO will obtain, organise and document feedback from the project stakeholders regarding concerns and requests.
- GAM 'Government and Community Relations' team will transfer the feedback obtained from stakeholders
 to GAM management and related departments as relevant and Contractor(s) so that this information can
 be addressed in project decision-making and design.
- GAM 'Government and Community Relations' team will provide advice to relevant departments as applicable.
- GAM 'Government and Community Relations' should be included in the Environmental and Social Management System.
- GAM will review and approve the Contractor(s)'/Service Provider(s)' policies and guidelines (with regards to environment, HSE, and other applicable as requested by GAM).

The table below provides a list of the relevant entities outside GAM/departments/teams/involved parties that will most probably be involved in the SEP implementation including the main lead party, participants in the activity, the purpose and topics, and the frequency of implementation.

Table 8: Relevant Entities/Departments/Teams/Involved Parties outside GAM that will Potentially be Involved in the SEP Implementation (ECO Consult, 2019)

Involved Parties		Purpose and Topics	Frequency
Main Lead Participants			
Shareholders			
Mayor and Higher	City Council	■ Follow up on new developments and progress of events and all	Monthly/As
Management		GAM activities	needed
Deputy City Manager for District and Environment Affairs	GAM Departments and landfill employees	■ Follow up on progress of work at the landfill or any other significant issues associated with the project area, including security or health and safety	Weekly
Stakeholders who ma	ay be directly or indirectly af	fected by the Project	
GAM, CLO, 'Government and Community Relations' team, PLC, Uhud district office	Community stakeholder groups, NGOs, CBOs, Academia	 Provide regular updates on project activities of interest to stakeholder and which could affect them Ensure that communities are consulted on the Ghabawi site developments Community integration and follow up on community issues, such as local unemployment, child labour, drug abuse and gender related issues 	Monthly
Stakeholders who h	ave a regulatory role in e	nsuring the implementation and compliance of projects (Secondar	ry Interested
Parties/Stakeholders	3)		
GAM, CLO, 'Government and Community Relations' team,	Ministry of Environment	 Environmental monitoring Related permits or licenses and any additional ESIA requirements for the Ghabawi Landfill or any other future developments Coordinate to stop illegal practices around the landfill 	As needed
and Technical Manager, Landfill Manager	Water Authority of Jordan	 Risks to water resources Groundwater quality monitoring Updated information on wells in the vicinity of the landfill 	
	Jordan Electric Power Company Energy and Minerals Regulatory Commission	■ Electric power connection and generation	
	Civil defence	■ Review and discuss Emergency Response Plan	
	Other municipalities	Discuss types of waste, waste transportation, traffic and wind- blown litter	

GAM has several departments and teams that may be involved directly or indirectly in the implementation of this SEP. The main involved departments are those under the direct management of the Deputy City Manager for Environment and District Affairs. The 'Government and Community Relations' team formed by GAM management and lead by the CLO shall include representatives from these different related departments in order to collaborate for SEP implementation. The relevant departments within GAM are outlined in the table below in addition to their scope of work, responsibilities, and requirements for implementation. Representatives from these departments/teams will most probably be part of the GAM 'Government and Community Relations' team.

Table 9: Relevant Entities/Departments/Teams/Involved Parties Within GAM that will Most Probably be Involved in the SEP Implementation (ECO Consult, 2019)

Entity	Scope	Responsibilities	Requirements
Community Liaison Officer (CLO)	■ Lead and engage different departments within GAM to follow-up/ coordinate and ensure that SEP actions are implemented ■ Main point of contact for the project with local communities and stakeholders on all project-related issues ■ Builds and maintains relationships with community members to better understand	 Ensure timely disclosure of project information in Arabic to the key stakeholders Undertake informed participation and meaningful two way consultation with the affected stakeholders Development and implementation of a grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed. Develop and implement SEP, Community Needs Assessment and Integration Plan and CSR programme Keep a log of all grievances Develop, update, and follow up on implementation for project specific plans and procedures, training plans and programmes, and labour and employment plan Preparation of bi-weekly, monthly, quarterly and annual 	 Cadre Logistics Collaboration with other departments

	community concerns and perceptions Reports to the Deputy City Manager for District and Environment Affairs in GAM	reports including documentation for the above items. Follow up on activities and recommendations in relation to the Landfill Site Public Liaison Committee (PLC) for Ghabawi landfill Ensure PLC monthly meeting notice is circulated along with meeting agenda (minimum 2 working days prior to meeting) Email minutes of meeting for PLC meetings to all committee members within two weeks Liaise with Environmental Directorate to undertake activities and initiatives to raise awareness	
Department of Environmental Studies and Awareness	 Engage with local community to raise public awareness and behaviour change towards solid waste management 	 Establish an awareness plan for Uhud district Coordinate with CLO regarding implementation of plan Conduct lectures, workshops, and campaigns 	Collaboration with other departments
Social Media & Communications Channels Unit	■ Supervision of GAM's different social media platforms	 Disclosure of information such as project updates on different social media platforms Forward complaints received on social media to relevant departments Conduct social media campaigns to promote activities and initiatives implemented by GAM 	Collaboration with other departments
Department of Social Utilities and Programmes	 Management and supervision of social development of local communities 	 Establish a social plan for Uhud district Organise training programmes targeting different age groups from Uhud district Hold recycling lectures and workshops 	Collaboration with other departments
Women Network	 Encourage local women's participation in initiatives and decision-making 	 Conduct training seminars targeted for women Hold awareness sessions about recycling and solid waste management amongst female groups and stakeholders 	Collaboration with other departments

A CLO has been assigned for the Project to act on behalf of GAM as the main point of contact for the project with local communities and stakeholders on all project-related issues (i.e. representative of project in front of local communities). The CLO shall lead the implementation of the SEP in coordination with all direct and indirect involved departments and personnel as well as nominated representatives and members from the 'Government and Community Relations' team. He shall request related update reports, documentation, and findings from different department and amalgamate in one report made available on a regular basis in an agreed and suitable format to related parties (GAM management, IFI, stakeholders...etc). He shall lead communication with the communities and stakeholders and internally with related departments and teams as well as the 'Government and Community Relations' team in GAM for implementation of interconnected activities. The CLO is expected to make him/herself available for actions related to the implementation of this SEP throughout the duration of the Project. GAM management is expected to provide him with the suitable and sufficient support staff and logistics required for him to undertake and manage the SEP actions.

Responsibilities and Job Description:

The CLO builds and maintains relationships with community members to better understand community concerns and perceptions. The CLO serves as the principal link, and thus also a critical communications channel, between the project operation and community members and stakeholders. The CLO shall report to the Deputy City Manager for District and Environment Affairs in GAM.

The CLO will work and lead the GAM 'Government and Community Relations' team as well as others to develop, update, implement, and supervise progress for the following deliverables/milestones/commitments:

- Timely disclosure of project information in Arabic to the key stakeholders.
- Informed participation and meaningful two way consultation with the affected stakeholders.
- The grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed.
- Social action plan.
- Implementation of SEP.
- Community Needs Assessment and Integration Plan as well as the CSR programme

- Project specific training plan and programme.
- Implementation of project specific plans and procedures.
- Implementation of project specific labour and employment plan.
- Disclose action plans and relevant information to related communities and stakeholders.
- Preparation of bi-weekly, monthly, quarterly and annual reports including documentation for the above items.
- Follow up on activities and recommendations in relation to the Landfill Site Public Liaison Committee (PLC) for Ghabawi landfill.

GAM CLO in association with the 'Government and Community Relations' team that includes representatives from different line departments (e.g. Environmental Awareness Department, Department of Social Utilities and Programmes, Vector control and Animal Welfare Department, Community Health Directorate...etc.) and others as relevant will collaborate to implement the SEP actions and stakeholder engagement programme including carrying out public consultations and information dissemination that will reflect main issues of relevance to the Project as well as hold the regular PLC meetings with designated stakeholder representatives.

8.2.2 Contractor(s)/Service Provider(s) Responsibilities

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP. The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the contractors.

- Contractor(s)/Service Provider(s) shall follow all GAM policies, including the present document and those that pertain to Stakeholder Engagement activities and for commitments made and documented by GAM.
- Contractor(s)/Service Provider(s) shall also appoint a 'Community Engagement' responsible or team who
 will be the counterpart in relation to the SEP implementation and coordinates with GAM.
- Contractor(s)/Service Provider(s) will provide information to GAM 'Government and Community Relations' team related to actions and activities that involve GAM stakeholders and influence areas, specifically those that involve potential social and environmental impacts. The team will also inform in regards to social incidents and community relations issues.
- Contractor(s)/Service Provider(s) 'Community Engagement' responsible or team shall coordinate with GAM Government and Community Relations Team
- Contractor(s)/Service Provider(s) 'Community Engagement' responsible or team should be ready and available to participate in GAM's public consultation and disclosure activities, if required by GAM. The team will also attend all coordination meetings requested by GAM 'Government and Community Relations Team' on a daily, weekly and extraordinary basis as required.
- Contractor(s)/Service Provider(s) 'Community Engagement' responsible or team will report to GAM
 'Government and Community Relations' team on a daily, weekly and extraordinary basis in regards to
 social incidents and community relations issues.

8.3 Planned Stakeholder Engagement Programme

8.3.1 Overview

There are no communities within the immediate vicinity of the Ghabawi landfill, thus no direct significant social effects are anticipated on the surrounding communities. Based on the proceedings of the ESIA (2018), the direct environmental and social impacts from the Ghabawi Landfill on the surrounding communities is limited due to the setback distance with the Landfill. The potential environmental and social risks associated with the landfill as described in section 1.3.7. These impacts are mainly because the waste transfer trucks transferring waste from the Shaer WTS as well as from Zarqa and Russaifeh Governorates to the Ghabawi Landfill use the main Ghabawi Road which passes through different communities and commercial activities.

The trucks (mainly from Zarqa and Russaifeh Governorates) dispose waste on the sides of the road and speeding which cause different EHSS impacts and nuisances, mainly due to wind-blown plastic bags that is consumed by the sheep and goats that may be grazing seasonally in the area.

Moreover, given the mandate that GAM has been allocated in addition to the municipal services which includes urban planning, social services, land use allocation, permitting...etc., the communities' comments regarding GAM is not only related to the Ghabawi Landfill per se, but also the community are not satisfied from the type of developments allowed and permitted by GAM in the general Uhud area indicating that most of these developments have negative EHSS impacts with very little socio-economic benefits. The community reiterated on different occasions that the Government is allowing all 'polluting' activities to take place in the East Amman Area without providing any direct benefit to the communities and they believed that all positive and sustainable developments are established in the affluent areas of Amman while all 'polluting' developments are established in their area. Moreover, there is a general lack of trust in GAM and there EHSS commitments. Limited means of communication exist between GAM and these communities and this is becoming a source of annoyance to the consulted stakeholders. They also indicated that there are limited social development plans or community based initiatives. The stakeholders indicated that very limited jobs are offered to the community members around these projects. In general, the community expressed their frustration and indicated that they would like to see a green sustainable project developed by GAM in the area for a change.

GAM does not have any specific plans for employment from the local community. They also do not have plans for social responsibility, local community engagement, and providing a capacity building and training programmes.

Taking all of the above into account, it is important for GAM to adopt different plans and measures to engage with the local communities and stakeholders and by doing so, retrieve mutual trust and cooperation.

Notwithstanding the complaints set forth by the community groups in the area, the main purpose of the GAM and Government plans for the developments in the area is to bring in new investments and developments that would help alleviate stresses in the area and provide new sources of income and employment for the communities. Collaborative efforts should be undertaken by GAM in association with different partners to ensure the realisation of such goals. The employment and community benefits should be real and transparent in order to help build new lines of trust between all parties.

8.3.2 Methods and Approaches

Based on the above and all the findings of this ESIA, as part of this SEP, GAM shall implement several stakeholder engagement methods are elaborated below.

Stakeholder Engagement Programme - Methods & Approaches

* GAM to determine responsible parties for SEP implementation within GAM (CLO, 'Government and Community Relations' team, others) and their responsibilities/liabilities as well as communication channels. This shall be documented through signed minutes of meeting, official letters, and signed Terms of Reference (ToR).

* GAM to determine partners from outside GAM that will have a role in SEP implementation and meet with them to explain their role and anticipated input timeline and scope. Such meetings and discussions shall be documented through signed minutes of meeting and official letters.

4. Community Liasion 3. Public Liasion 5. Grievance 2. Meeting and 1. Disclosure Officer (CLO) and 6. Raising Awareness Consultations Committee (PLC) Mechanism Team Step1: determine Step1: determine Step1: Coordinate with the Step1: Assign CLO and Step1: Lodging a grievance Step1: Identify stakeholder responsibilities inside GAM responsibilities inside GAM local district office (Sahab 'Government through groups, their involvement and related partners from and related partners from District) / Uhud District Community Relations' team communication channels and relevance outside GAM outside GAM Step2: Determine Step2: Establish the Step2: Grievances will be Step2: Identify stakeholder Step2: Define documents to be disclosed Committee to include forwarded to relevant Step2: Identify groups, their involvement responsibilities and ensure and update regularly - as members from (example): responsible department / responsibilities and roles and relevance full knowledge of mandate required/applicable entity -Uhud District Office Step3: develop a meeting Step3: constant Step3: Coordinate with CLO -Local Municipal Council Step3: Create schedule of Step3: Determine programme to include communication with and team in order to keep events, programmes, stakeholder groups to participants and meeting -Decenerlisation stakeholders, track of grievance case in initiatives disclosure receive Committee schedules (once every communities. GAM for grievance log documents as well as three months or six implementation -Environmental inspection Step4: Response to communication and months) interrelated activities within Uhud section complaint within a specified disclosure channels Step4: Set goals District timeframe based on nature Step4: Documentation of complaint -Community Step4: Hold Step4: Set meeting goals regular and reporting Representatives and Step5: Determine methods meetings to disclose Step5: Follow up with Residents raising awareness complainant on response or updates and progress (Brochures, Campaigns, solution to compaint Step3: Establish a ToR for etc.) Step5: document findings, Step5: Prepare meeting the governance, agenda and material comments. disclosure Step6: Closure of complaint operation and packages, timeline, and keeping a log of all Step6: Identify audience monitoring the feedback...etc of complaints committee to ensure Step6: Decide time and proper delivery and location of meeting accountability and Step7: Implement and familirise all members Evaluate Step7: Send invitations Step4: Sign ToR Step8: Prepare Minutes of Step5: Hold monthly Meetings if needed and meetings, provide them share with minute of meetings concerned parties and outline decisions and actions

Figure 5: Methods to be Implemented by GAM for the Planned Stakeholder Engagement Programme (ECO Consult, 2019)

Table 10: Stakeholder Engagement Strategy and Plan in Relation to the Ghabawi Landfill (ECO Consult, 2019)

Stakeholder	Objectives	Communication Methods and Tools	Timeframe
Shareholders	Objectives	Communication Methods and 100is	Timename
GAM management and employees	Update SEP and disclose	 SEP to be disclosed in Arabic and English on GAM's website Deposit copies at site, GAM Head Office and Uhud District Office 	Every 6 months/as reg.
cimployees	Disclosure of Non-Technical Summary (NTS) of Project	 To be disclosed in Arabic and English on GAM's website Deposit copies at site, GAM Head Office and Uhud District Office 	Once
	Prepare simple Grievance Procedure document and disclose	■ Deposit copies at site, GAM Head Office and Uhud District Office	Once and update as required
	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	 Individual/Internal Meetings (if required) Submission of annual environmental report. 	Annually
Stakeholders who may be direct	ctly or indirectly affected by the Project		
Nearby local communities (Uhud District)Livestock herders	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism	 SEP to be disclosed in Arabic and English on GAM's website Hardcopy of SEP in Arabic and English to be available at site and Uhud District Office 	Once and update as required
 IPP1 IPP3 IPP4 Elayyan Cow Farm 17.6 MW Solar PV Power Project Chicken fodder factory ASTPP Military Camp Tadweer Waste Sorting Facility Medical Waste Incinerator Amman Custom Centre Ghabawi landfill employees 	Provide regular updates on project activities of interest to stakeholder and which could affect them. Include in updates information on Emergency Response Plans.	 Monthly meetings shall be held with liaison committee and officers to inform them on updates on project. The meetings are to be held in coordination with Local District Office and Local Municipality for local community representatives to include elected members of municipal council, elder representatives of tribal groups, community based organisations, women groups, youth and unemployed, local enterprises and businesses, and local governmental institutions. Prepare newsletter in Arabic with updates on project and its environmental and social issues. Leaflet to be disclosed at key local community platforms to include Local District Office, Local Municipality, women Community Based Organisations (CBO's), youth CBO's, etc. 	Monthly
Stakeholders who have a regula	atory role in ensuring the implementation and compliance of	projects (Secondary Interested Parties/Stakeholders)	
MEMRMoAMoMA	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism	 SEP to be disclosed in Arabic and English on GAM's website Hardcopy of SEP in Arabic and English to be available at site and GAM Head Office 	Once and update as required
MoTAMoTMoH	Provide regular updates on project activities of interest to stakeholder and which could affect them. Include in updates information on Emergency Response Plans.	 Prepare newsletter in Arabic with updates on project and its environmental and social issues. 	Monthly
MWI/WAJ MoL NEDGG	Review with the Ministry of Environment the ESIA and permitting requirements	Individual/ Internal MeetingsOfficial Letters	Annually and as required
NEPCOJEPCOEMRC	Review and discuss Project environmental monitoring programme and Monitoring Plan with the Ministry of Environment (including air quality, dust, odour,	Individual/ Internal MeetingsOfficial Letters	Annually and as required

MoEnv	groundwater, leachate etc.)		
	Review and discuss Project groundwater quality	 Individual/ Internal Meetings 	Annually and as
	monitoring programme with MWI/WAJ	Official Letters	required
	Liaise with WAJ and obtain updated information on wells	 Individual/ Internal Meetings 	Annually and as
	in the vicinity of the landfill	Official Letters	required
	Review and discuss the implementation of an Occupational	 Individual/ Internal Meetings 	Annually and as
	Health and Safety Plan, including worker medical	Official Letters	required
	surveillance and welfare facilities.		
	Review and discuss Emergency Response Plan and update	 Individual/ Internal Meetings 	Annually and as
	annually.	Official Letters	required
	Coordinate with JEPCO, and submit an application for the	 Individual/ Internal Meetings 	Once
	generation of electricity and connection to the grid and for	Official Letters	
	a generation license from EMRC.		
Stakeholders who have	e the potential to influence the authorization of the Project and assist	in its delivery	
RSCN	Disclosure of Stakeholder Engagement Plan (SEP)	 SEP to be disclosed in Arabic and English on GAM's website 	Once and update as
EASEP	including grievance mechanism		required
	Provide regular updates on project activities of interest to	 Prepare newsletter in Arabic with updates on project and its 	Monthly
	stakeholder and which could affect them. Include in	environmental and social issues	
	updates information on Emergency Response Plans.		

8.3.3 Disclosure of Documents and Information

To ensure that project stakeholders are continually being updated on project progress and related EHSS issues, information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents. The disclosure package will be publicly available in Arabic language (as well as English if available) to relevant stakeholder groups through various communication channels agreed by GAM. At this stage, the following documents will be disclosed for effective stakeholder communication:

- Non-Technical summary.
- The Stakeholder Engagement Plan.
- Grievance Form and leaflet.
- Brochure and leaflet to include a summary of project activities and key associated risks.

There are different communication channels through which information can be disclosed as illustrated in the figure below, including:

- GAM website: <http://www.ammancity.gov.jo>
- Social Media: GAM Facebook Page, twitter, GAM phone application, etc.
- GAM Head Office in Amman:

Greater Amman Municipality, Omar Matar St., Rass Alain

P.O. Box 132, Amman 11118

Telephone: 00962 (0)6 463 6111

Fax: 00962 (0)6 464 9420

Uhud District Office:

North Khashafiyeh / Addabaybeh Neighbourhood, Next to the Health Centre

Tel: 00962 6 402359, Fax: 00962 6 4023480

- Regular meetings
- Project information will also be distributed through local newspapers, media, etc.

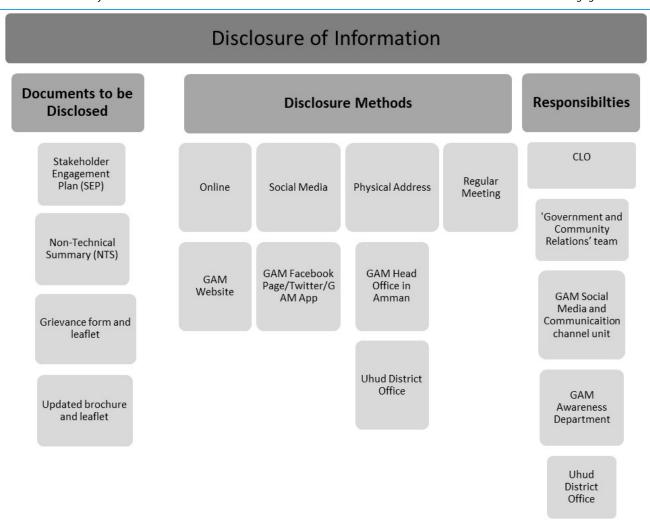


Figure 6: Tools and Approach to be Followed by GAM for Disclosure of Information (ECO Consult, 2019)

8.3.4 Meetings and Consultations

GAM will use different tools and approaches for undertaking meetings and consultations with different stakeholder groups. This is mainly done through the following channels/methods:

Project Shareholder Meetings:

GAM report to its shareholders on new developments and progress of events. Monthly meetings will be held between the Mayor and the City Council on all the GAM activities. GAM also conducts weekly meetings with the Deputy City Manager for District and Environment Affairs in GAM on progress of work at the landfill or any other significant issues associated with the project area, including security or health and safety.

Governmental Meetings:

GAM CLO in collaboration with the Government and Community Relations Team will consult with the government organisations, including the MoEnv, on all the related permits or licences and any additional ESIA requirements for the Ghabawi Landfill or any other future developments. The consultation methods for permitting bodies and government organisations will be through official letters, and then upon request of the related ministry, meetings will be held as required.

Public/Community Meetings:

GAM will hold public meetings every month at the Uhud District Office to ensure that communities are consulted on the Ghabawi site developments. This shall be managed and coordinated by the CLO in collaboration with the Government and Community Relations Team.

Focus groups and Workshops (targeting vulnerable groups):

GAM social department has a centre in Uhud District that facilitates workshops, focus groups and training for locals, particularly women and children. The social department will liaise with the CLO and the Government and Community Relations Team on all the related community issues, such as local unemployment, child labour, drug abuse and gender related issues. This department also provides community development programmes for vulnerable groups, including the illiterate, elderly and refugees. Thus, the collaboration between this department and the CLO team in relation to the Ghabawi Landfill will benefit the project on improving community issues.

Awareness Sessions:

The Environmental Directorate is also responsible for raising public awareness on protection of environment through waste segregation, recycling and reuse. This CLO in collaboration with the Government and Community Relations Team will liaise with this department to undertake activities, events, school competitions and initiatives to raise local environmental awareness in order to promote recycling and other waste management practices. The Environmental Awareness Department shall prepare an action plan for implementation with timeline and this shall be undertaken in coordination with the CLO team to ensure proper documentation and dissemination. Table below provides a provisional preliminary awareness plan prepared by GAM.

Table11: Provisional Preliminary Awareness Plan Prepared by GAM to be Implemented in Uhud District (ECO Consult, 2019)

		Awareness Plar	n
#	Procedure	Target Group	Responsibility
1	A training programme targeting different age groups from Uhud district and Al- Quwaysimah	Schools and local community around landfill area and Al Shaer Waste Transfer Station	Department of Environmental Studies and Awareness + Department of Social Utilities and Programmes +Uhud district
2	Participation in waste separation programmes (separation of paper)	School Students	Department of Environmental Studies and Awareness + Community Liaison Officer (CLO) + Schools+ Uhud district
3	Hold recycling lectures and workshops	Local Community + School and University Students	Department of Environmental Studies and Awareness + CLO + Department of Social Utilities and Programmes+ Uhud district
4	Site visit to Al Shaer Waste Transfer Station and Ghabawi Landfill	Local Community + School and University Students	Department of Environmental Studies and Awareness + Department of Social Utilities and Programmes + Department of Transport + Landfill Management+ Uhud
5	Hold meetings and awareness sessions to present ideas and suggestions	Local Community	Department of Environmental Studies and Awareness + Department for Waste Treatment + Department of Social Utilities and Programmes + Uhud district
6	Involve the local community and schools in environmental projects. Select an area as a sample to implement initiatives such as waste separating projects (paper, plastic, metals, and e-waste)	All Groups	Department of Environmental Studies and Awareness + CLO+ Uhud district
7	Involve school students in environmental competitions and encourage them to compete by involving them in the collection of paper waste and participating in competitions held at national-level	School Students	Department of Environmental Studies and Awareness + Department of Social Utilities and Programmes + Uhud district
8	Utilising available space with waste reuse and agricultural ideas	School Students + District Committees	Department of Environmental Studies and Awareness + Department for Agriculture + Ghabawi Landfill Management+ Uhud district
9	Put up sign-boards and broadcast environmental televisions spots on electronic screens in Uhud district and Al- Quwaysimah	Recipient of Service	Department of Environmental Studies and Awareness + Amman Identity Centre+ Uhud district
10	Prepare quarterly brochures for GAM's achievements that serves the region	All Groups	Uhud district and Al-Quwaysimah
11	Organise an open medical day in	Local Community	Uhud district and Al-Quwaysimah

coordination with the Ministry of Health

 Holding bilateral discussions with statutory authorities and utilities, e.g. in relation to environmental monitoring (MoEnv), risks to water resources (WAJ), and electric power connection and generation (JEPCO, EMRC).

8.3.5 Landfill Site Public Liaison Committee (PLC) for Ghabawi landfill

Establishing a Landfill Site Public Liaison Committee (PLC) for Ghabawi landfill, and using it to provide updates and keep the local community informed on Project activities and plans at Ghabawi, address Environmental, Health, Safety, and Social (EHSS) issues at the Ghabawi Landfill, including cumulative effects associated with other operations nearby, and on the grievance mechanism.

GAM discussed the setup and composition of this PLC with the Local District office (Sahab District) and it was agreed to form this committee headed by the elected local community representative from Uhud District with the following members: Manager of the Uhud District, Member of decentralisation committee, East Amman Society For Environmental Protection (EASEP)⁵, local community and clan representatives, GAM CLO, Head of the Environmental Protection Section in the Uhud District. An official decision was issued by GAM to this effect. The CLO is currently arranging to hold the first meeting for the PLC.

The Ghabawi PLC shall serve as a focal point for dissemination, consultation, review and exchange of information regarding the operation of the Ghabawi Landfill Site, including environmental monitoring, maintenance, complaint resolution and new approvals or amendments to existing approvals related to the operation of the landfill site. The scope for this PLC is as follows:

Scope for the PLC	Provide updates and keep the local community informed on project activities and plans	
	Address Environmental, Health, Safety and Social (EHSS) issues at the Ghabawi Landfill	
	Implementation and follow-up on grievance mechanism	
	Serve as a focal point for dissemination, consultation, review and exchange of information	
	Discuss and provide a framework for the Community Needs Assessment and Integration Plan (Recruitment, Procurement, CSR)	

As indicated in Figure 5, GAM shall together with the PLC members, establish a ToR for the governance, operation and monitoring of the committee to ensure proper delivery and accountability. The TOR shall be endorsed and signed by all PLC members.

The Ghabawi PLC shall meet on a monthly basis and the CLO team shall ensure that meeting notice is circulated to its members, including the agenda for the meetings, to be provided to members of the Committee a minimum of two (2) business days prior to the date of each meeting. The CLO shall circulate draft minutes via e-mail to Committee members within two weeks of the meeting date, and subject to any corrections, will be posted on the information boards within the Uhud District office and Sahab District office and shall also be reflected in the monthly news bulletin disclosed for the Landfill. Any member of the Committee, who misses three consecutive meetings, without being excused by the Committee, may be removed from the Committee.

The Ghabawi PLC shall also discuss and provide a framework for the Community Needs Assessment and Integration Plan.

⁵ The EASEP undertakes different environmental and social campaigns in the East Amman Area including Uhud District, is one of the key stakeholders in the area providing feedback and comments to the developments in the Uhud District regarding EHSS performance and highlighting their commitments towards the local community, has been representing different community members in submitting grievances against GAM and Ghabawi Landfill operations (summarized in Section 4), is a trusted representative from the community and has the capacity to discuss EHSS aspects.

Community Needs Assessment and Integration Plan

It is recommended that GAM to the extent possible adopts and implements a Community Integration Plan (CIP) for working with the local community members. The Plan shall aim to support the local economy stating its aims and objectives and shall acknowledge the importance of building a strong socio-economic relationship with the local community through a participatory planning programme even before the development is in place.

The CIP shall be based on consultations and engagement activities with relevant local stakeholders to include governorate representatives, municipality representatives, community representatives, members of PLC, and other as appropriate. Throughout such consultations, GAM shall discuss the approach for implementation of the CIP with the stakeholders.

The Plan shall to the extent possible include the main requirements outlined below.

- Project Updates Procedure: the procedure shall aim to ensure timely and continuous communication and dissemination of information with the local community through appropriate local platforms. The objective is to: (i) alleviate potential sense of social marginalization, (ii) improve their understanding and perception of the benefits associated with development, and (iii) manage expectations related to opportunities from the Project and clearly identify commitments by developers related to social development.
- Local Recruitment Procedure: the procedure shall identify the number of job opportunities targeted for local communities to include skilled and unskilled workers. In addition, the procedure shall include details on how job opportunities will be announced as well as a selection process that is fair and transparent and provides equal opportunities for all, including females.
- Local Procurement Procedure: the procedure shall identify the procurement opportunities targeted for local communities to include, for example, local subcontractors, local supplies and services, etc. In addition, the procedure shall include details on how procurement opportunities will be announced as well as a selection process that is fair and transparent and provides equal opportunities for all.
- Social Responsibility Programme: GAM shall consider implementing a social responsibility programme that identifies priority development projects which could benefit local communities, allocated budget, timeline for implementation, etc.

9 GRIEVANCE PROCEDURE

GAM understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Ghabawi Landfill. 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 will signal any recurrent issues, or escalating conflicts and disputes.

GAM shall implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. GAM shall accept comments and complaints associated with the Ghabawi Landfill and 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.

GAM shall monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. GAM shall also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

9.1 Stakeholder Engagement Grievance Procedure

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

Grievance Procedure

- 1. Primarily, all grievances will be received through communication channels including:
- a. GAM Complaints Direct Line: 0096264636111
- b. GAM Complaints E-mail Address: shakawi.dwn@ammancity.gov.jo
- c. GAM's Social Media platforms (Facebook and Twitter)
- d. Hawa Amman Radio (FM 105.9)
 - GAM's Smart Phone Application: GAMAPP
- e. Uhud District representatives, the Community Liaison Officers and the Female Community Liaison Supporting the CLO from the Uhud District.
 - Uhud District: 00962 6 4020410
 - CLO: Osama Abu Rumman 00962 79 8686111
 - Female Community Liaison Supporting the CLO from the Uhud District: Amal AlJbour 00962 79 6595909
- f. Entrance Office/gate of the Ghabawi Municipal Waste Landfill
 - Eng Abdallah Dnebat 00962 79 053696
- g. GAM encourages community members and stakeholders to use the new joint governmental platform (بخدمتكم) / Bekhedmetkom or 'at your service' to submit any complaints and/or suggestions, given that it is a neutral interactive portal to communicate with different governmental entities and follow up on the different questions, suggestions, and complaints
- 2. A Grievance Disclosure Sheet (Annex 1) and Grievance Sheets (Annex 2) will be disclosed at the locations identified and listed above. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 3 below.
- 3. All grievances (whether submitted through a grievance form, e-mail, telephone, etc) will be recorded on a grievance log sheet by the CLO (Annex 3).
- 4. It is possible that for some grievances, women might feel uncomfortable discussing a grievance with a person of the opposite sex; therefore the grievance mechanism also includes a female community liaison supporting the CLO. This female liaison person is selected from the Uhud District (Name and contact details shall be provided in the Grievance Disclosure Sheet and Grievance Sheets).
- 5. Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 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.
- 6. In coordination with the relevant personnel, the CLO will analyse the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable).

- 7. The CLO will prepare a grievance resolution form (see Annex 4) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within twenty (20) days of receiving the grievance.
- 8. The outcomes of the grievance resolution form will be communicated to the complainant by the CLO in accordance with the preferred method of communication specified. The grievance resolution form must be signed-off by the CLO and the complainant.
- 9. In the case the grievance resolution form identifies proposed actions to be implemented; the CLO will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form.
- 10. Upon resolving the grievance, a grievance closeout form (annex 5) will be prepared to be signed off by the CLO and the complainant that will detail the solution that was implemented to resolve the grievance.
- 11. The CLO will ensure that the grievance forms, grievance log sheet, grievance resolution form, and grievance closeout form are updated and maintained onsite at all times.
- 12. The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
- 13. The use of grievance mechanism shall not impede access to judiciary means, if relevant.
- 14. The grievance mechanism allows submission of anonymous complaints by community members.

GAM will also monitor the way in which grievances are being handled by their staff and Contractor(s) and ensure they are properly addressed within deadlines specified on their website. GAM CLO will keep a grievance log of all grievances (including those received and addressed by the Contractor(s)).

GAM 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 and specifically via the Ghabawi Landfill Liaison Committee, protecting the privacy of individuals.

In addition to the above, the grievance process will follow the following key steps for the GAM's communication channels:

Grievance Mechanism through social media:

- Complainant sends grievance and/or pictures as a message to GAM's Facebook Page (city of Amman)
- Social Media team forwards the message through a WhatsApp group to representatives from different GAM departments; who in turn relay the message/complaint to the concerned person in charge.
- The complainant is then contacted for further details.
- The complaint is resolved as per grievance procedure outlined above and as per time needed or a reply is sent back to the complainant within 24-48 hours.
- After closure and resolution of the complaint a resolution form is filled and kept in grievance log

Grievance Mechanism through Hawa Amman Radio:

- Mayor of Amman meets with the public twice a week (Saturdays and Tuesdays) from 2:00-4:00 pm to hear and respond to their complaints/grievances live on the air.
- The complainant might be directly connected to the concerned manager on air to receive a response to their complaint.
- The complaint is resolved as per grievance procedure outlined above and as per time needed or a reply is sent back to the complainant within 24-48 hours.
- After closure and resolution of the complaint a resolution form is filled and kept in grievance log

Grievance Mechanism through (بخنهتکم) / Bekhedmetkom or 'at your service' (https://jordan.gov.jo/wps/portal/Home/CMU):

- The applicant shall file a petition through the channels used for the service. (Online or in-person)
- The applicant shall provide the Diwan with documents relating to the grievance.
- The application is then received and reviewed by the grievances department.
- The legal response to the complaint is then prepared.
- Application Approval:
- Approval: In the event of an entitlement to the applicant, an official letter is sent to the concerned governmental department/entity to request response or resolution. Timeline depends on importance, severity and nature of complaint
- Refusal: The applicant is informed of the rejection of the grievance if the grievance is invalid.
- The complaint is resolved as per grievance procedure outlined above and as per time needed or a reply is sent back to the complainant within 24-48 hours.
- After closure and resolution of the complaint a resolution form is filled and kept in grievance log

Grievance Mechanism through GAM's website:

- Lodging a grievance via GAM's website
- Grievance is forwarded to relevant entity for appropriate action and resolution of complaint
- Resolution and response time is specified on GAM's website depending on nature and importance of complaint
- The complaint is resolved as per grievance procedure outlined above and as per time needed or a reply is sent back to the complainant within 24-48 hours.
- Notify complainant of steps taken for complaint resolution
- After closure and resolution of the complaint a resolution form is filled and kept in grievance log

	Grievance Mechanism	
Through Social Media	Through the Governments Online Portal "بخدمتكم"	Through GAM's website
Send grievance through GAM social media Page	File a petition through Bekhedmetkom channels (Online/In person)	Lodging a grievance via GAM's website
Social Media team forwards grievance to a what's app group including representatives from different GAM departments	provide the Diwan with documents relating to the grievance	Grievance is forwarded to relevant entity for appropriate action and resolution of complaint
Department Representatives relay message/complaint to the concerned person in charge	Recieve and review application by grievance department	Resolution or response to complaint within a time frame specified on GAM's website
Contact complainant for further details	Legal response to complaint is prepared	Notify Complainant of steps taken
The complaint is resolved as per time needed or a reply is sent back to the complainant within 24-48 hours	If application is approved, an official letter is sent to the concerned governmental department/entity to request response or resolution	Closure of complaint and register in complaints log
Closure of complaint and register in complaints log	The complaint is resolved as per time specified based on nature of complaint	
	Closure of complaint and register in complaints log	

9.2 Summary of Worker Grievance Procedure

Given that there is an Employee Relations department in GAM, engagement actions with employees and workers at the landfill are not included within the scope of the SEP. However, a summary of the Grievance Procedure available for workers is provided.

A workers' grievance procedure is established for the employees of GAM at the landfill 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;
- Employee Relation Section of Human Resources Department at GAM; or
- Public Services Union Representatives.

Landfill workers can go to the Landfill Manager, direct to the GAM Head Office and to the Public Services Union Representative who is based at GAM Head Office to raise concerns and issues

Anonymous lodging can also be made possible (via grievance boxes – one of which should be available on site at the landfill). 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. Information on Contact Points will be posted on staff information boards and on site information boards.

10 CONTACT DETAILS

GAM intends to provide all relevant information to stakeholders on the Project at Ghabawi Landfill and the related operations of the landfill. Certain documents and information will be disclosed to relevant stakeholders, as indicated in Tables above. This includes: (i) regular updates on project activities (including on GAM website) and (ii) disclosure of the NTS and SEP.

These documents will remain in the public domain for the duration of the Project. The SEP will be updated periodically. Hard copies of these documents will be deposited at the GAM Head Office and the District Offices in Uhud District at the addresses shown below:

- GAM website: http://www.amman.jo
- GAM Head Office in Amman:

Greater Amman Municipality, Omar Matar St., Rass Alain

P.O. Box 132, Amman 11118

Telephone: 00962 6 4020410

Fax: 00962 (0)6 464 9420

Uhud District Office:

North Khashafiyeh, Next to the Health Center

Tel: 00962 6 402359, Fax: 00962 6 4023480

Project Facebook Page:

https://www.facebook.com/cityofamman/

 Project information will also be distributed through local newspapers, media and the GAM phone application.

Stakeholders, including the public, will be able to use the grievance procedure and information on this procedure will be disseminated as detailed in the preceding section.

EBRD will disclose a Project Summary Document on their website (www.ebrd.com).

Annex 1 - Grievance Disclosure Sheet



Any stakeholder or local community members willing to lodge a grievance related to the project should use the avenues identified below. The mechanism handles all grievances related to the Ghabawi Municipal Solid Waste Landfill to include grievances related to construction or operation activities, inappropriate conduct by workers, and other.

The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern. In addition, the use of grievance mechanism shall not impede access to judiciary means and will also allow the submission of anonymous complaints by community members.

Primarily, all grievances will be received through communication channels including:

- h. GAM Complaints Direct Line: 0096264636111
- i. GAM Complaints E-mail Address: shakawi.dwn@ammancity.gov.jo
- j. GAM's Social Media platforms (Facebook and Twitter)
- k. Hawa Amman Radio (FM 105.9)
 - GAM's Smart Phone Application: GAMAPP
- I. Uhud District representatives, the Community Liaison Officers and the Female Community Liaison Supporting the CLO from the Uhud District.
 - Uhud District: 00962 6 4020410
 - CLO: Osama Abu Rumman 00962 79 8686111
 - Female Community Liaison Supporting the CLO from the Uhud District: Amal AlJbour 00962 79 6595909
- m. Entrance Office/gate of the Ghabawi Municipal Waste Landfill

Eng Abdallah Dnebat 00962 79 053696

n. GAM encourages community members and stakeholders to use the new joint governmental platform (بخدمتکم) / Bekhedmetkom or 'at your service' to submit any complaints and/or suggestions, given that it is a neutral interactive portal to communicate with different governmental entities and follow up on the different questions, suggestions, and complaints.

Annex 2 – Grievance Sheet

PUBLIC GRIEVANCE FORM

Reference No.		
Full Name:		
Contact Information	By Post:	
	☐ By Telephone:	
Please mark how you wish to	☐ By E-mail:	
be contacted and add contact details	☐ Other (please specify)	
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of concern, incident, or		
grievance		
One-time incident/grievan	ce (date)	
Happened more than once	(how many times?)	
On-going (currently exper	iencing problem)	
What would you like to see		
happen to resolve the problem?		
Signature:		
Date:		
Please insert this form in one of the grievance boxes		

Annex 3 – Grievance Log Sheet

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

Annex 4 – Grievance Resolution Form

	GRIEVANCE RESOLUTION FORM
How was grievance received	Grievance Box (specify which box) Directly contact with CLO or Female Community Liaison Supporting the CLO from the Uhud District
Reference No:	
- ::: of Commun	
Description of Concern, Incident or Grievance: What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Grievance	
Has the Grievance been	Yes
Resolved?	No; <u>If not provide a justification below</u>
	Fill Out Fisher Section 1 OR Section 2 below
	Fill Out Either Section 1 OR Section 2 below Section 1
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
	Section 2
Summary of Proposed Actions to be Implemented to Resolve Grievance	
	·
Timeline for Implementation	
Implementation	
Implementation CLO Signature:	

Signature:

Annex 5 – Grievance Closeout Form

GRIEVANCE CLOSE-OUT FORM

Reference No:	
Full Name	
Description of Concern, Incident or Grievance:	
Description of Actions Taken to Resolve the Grievance	
Date of Submission of Grievance	
Date of Communication of Solution to Grievance	
Has the grievance been resolved (Yes/No)	
CLO	Complainant
	Complainant
Name:	Name:
Date:	Date:

Signature