

Compliance Assessment Report

Ma'an Solar Power Project
EBRD Project Number 44973
Case 2025/08

December 2025

The **Independent Project Accountability Mechanism (IPAM)** is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determines whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project.

For information about IPAM, please contact us at ipam@ebrd.com or visit the [IPAM webpage](#).

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How to submit a complaint to the IPAM

Concerns about the environmental and social performance of an EBRD Project can be submitted by email, in writing, or via the online form at:

<https://www.ebrd.com/project-finance/ipam.html>

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List of Abbreviations

AIP	Access to Information Policy
CSAIL	China Three Gorges South Asia Investment Ltd
CTGI	China Three Gorges International Limited
DEG	Deutsche Investitions- und Entwicklungsgesellschaft mbH
DFC	United States International Development Finance Corporation
EBRD	European Bank for Reconstruction and Development
ESP	2008 Environmental and Social Policy
IPAM	Independent Project Accountability Mechanism
MW	Megawatt
O&M	Operations and Maintenance
OPIC	Overseas Private Investment Corporation
PAP	Project Accountability Policy
PSC	Public Shareholding Company
PV	Photovoltaic
USD	United States Dollar

Executive Summary

The Request

On 26 May 2025, nine workers (the Requesters) submitted a complaint to the Independent Project Accountability Mechanism (IPAM) alleging deteriorating working conditions, wage and benefit changes, incorrect social security classification, and lack of grievance mechanism response. They requested confidentiality due to fear of reprisals and to have their complaint considered under the Compliance function.

The Project

On 3 September 2014, the Board of Executive Directors of the European Bank for Reconstruction and Development (EBRD) approved the [Ma'an Solar Project \(Op ID 44973\)](#), a secured limited recourse loan of up to USD25 million dollars to finance the development, construction and operation of a 24 MW solar photovoltaic plant located approximately 13 km to the southeast of Ma'an City. The project was categorized B, as per the 2008 EBRD Environmental and Social Policy, and entered operations in 2016.

IPAM process

The complaint was registered on 30 June 2025, as Case 2025/08 and transferred to the Compliance Assessment stage. As part of its processing IPAM engaged with the Requesters and Bank Management, but not with the Client. The reason for this was that, shortly after registration, the Requesters informed IPAM of their decision to withdraw their complaint. According to their communication, they had been able to have their concerns addressed satisfactorily by the Client and no longer wished to continue the IPAM process.

Conclusion and next steps

In light of the Requesters' decision and the apparent resolution of their concerns through the CAO dispute resolutions process, IPAM recommends that the Board approve the closure of Case 2024/01

This Compliance Assessment Report will be shared with the relevant Parties and published in the [Case Registry](#) at ebrd.com under [Case 2025/08 Ma'an Solar PV Project](#) (English version), following the Board's non-objection. Upon disclosure of this report, the processing of this case will be formally concluded.

1. The Case and Processing to Date

1.1 The Request

A group of nine workers of [Ma'an Solar Power Project \(OP Id 44973\)](#) in Jordan submitted a complaint to IPAM on 26 May 2025. They raised allegations related to working conditions. In particular, they alleged that in the past three years there had been changes in their contractual conditions as relates to compensation and benefits, incorrect classification for purposes of social security, and a continued deterioration of their working conditions. Furthermore, they alleged the workers' grievance mechanism was not operating properly, and no official responses or resolution had been provided to the multiple grievances filed.

Finally, the Requesters commented that they had been indirectly threatened with termination if they continued to raise demands for fair treatment.

The Requesters asked for confidentiality due to fear of reprisals and asked to have their complaint considered under the Compliance function only.

1.2 The Project

On 3 September 2014, the Board of Executive Directors of the European Bank for Reconstruction and Development (EBRD) approved the [Ma'an Solar Project \(Op ID 44973\)](#), a secured limited recourse loan of up to USD25 million dollars to finance the development, construction and operation of a 24 MW solar photovoltaic plant located approximately 13 km to the southeast of Ma'an City. The project was categorized B, as per the 2008 EBRD Environmental and Social Policy.

The Borrower, originally SunEdison, is a special purpose vehicle incorporated in Jordan for the sole purpose of developing, constructing and operating the project. Various changes in ownership have occurred since the loan approval to SunEdison, Inc, one of the world's leading solar developers.

In November 2016, the Plant was acquired by *Adwa' Ma'an Al Oula Lil Taka PSC*, a Jordanian special purpose vehicle fully owned by Alcazar Energy. In October 2019, Alcazar Energy took over the in-house O&M of the Plant.

In August 2021, China Three Gorges South Asia Investment Ltd (CSAIL), in consortium with other Chinese investors, acquired Alcazar Energy Partners, including the Ma'an Solar Power Plant.

Operations are therefore currently being undertaken by CTGI (China Three Gorges International Limited) Renewable Energy Partners.

The former Overseas Private Investment Corporation (OPIC), now USA Development Finance Institution (DFC), provided initially parallel funding, which was then taken over by Deutsche Investitions- und Entwicklungsgesellschaft mbH, the German development finance corporation (DEG).

The Plant entered the operations and maintenance (O&M) phase in July 2016 and the main workers' activities include solar PV module cleaning, preventive maintenance, and corrective maintenance activities.

1.3 IPAM Processing to Date

1.3.1 Registration of the Request

The Request was registered by IPAM on 30 June 2025 under [Case 2025/08](#) as it met the criteria for Registration established in Section 2.2 (b) of the Project Accountability Policy (PAP), and none of the exclusions set out in Section 2.2 (c) of the PAP applied at that stage. The registration of a Request is an administrative step establishing that the following criteria have been met:

- all mandatory information has been provided,
- issues raised relate to specific obligations of the Bank under the 2008 Environmental and Social Policy (ESP) and/or the project-specific provisions of the Access to Information Policy (AIP),
- it relates to a Project that the Bank has approved; and
- the Request submitted is related to an active project or is submitted within 24 months of the date in which the Bank has ceased to have a financial interest in the project.

Immediately after registration, the Request was transferred to the Compliance function as required by the Requesters.

1.3.2 Compliance Assessment

The Compliance Assessment stage has a standard duration of 60 business days. In this stage IPAM seeks to determine whether a Case is eligible for a Compliance Review or not. The PAP establishes that two criteria must be met to initiate an investigation:

- i. upon preliminary consideration, it appears that the Project may have caused, or may be likely to cause, direct or indirect and material harm to the Requesters (or, if different, the relevant Project-affected People); and
- ii. there is an indication that the Bank may not have complied with a provision of the Environmental and Social Policy (including any provision requiring the Bank to monitor Client commitments); or the Project-specific provisions of the Access to Information Policy (AIP), in force at the time of Project approval.

In the initial steps of the Compliance Assessment process for Case 2025/08, IPAM was able to:

- engage with Bank Management, who submitted a Management Response in August 2025, and
- interact with the Requesters to secure a better understanding of the complaint.

In November 2025, IPAM received a communication from the Requesters stating their intention to withdraw the Request, as their concerns had been addressed. As part of its verification process, IPAM scheduled a virtual call with the Requesters to understand the reasons behind their decision and to confirm that it was made voluntarily and without external pressure.

During this discussion, IPAM learned that a multilateral agreement had been signed between the Client, Contractors, the Ministry of Labour, and trade union representatives addressing the key concerns of the Requesters.

On 2 November 2025, the Requesters were presented with the agreement, which included the revision of the contractual conditions effective January 2026, providing greater transparency on workers'

compensation and benefits. The Requesters expressed satisfaction with the agreement stated that they were confident it would be properly implemented.

The Requesters also confirmed that the decision to withdraw from the IPAM process was entirely theirs and not influenced by pressure from the Client. At IPAM's behest the Requesters provided written confirmation of the above, which is part of the case file.

2. Conclusion and Next Steps

In light of the Requesters' decision and the apparent resolution of their concerns through the CAO dispute resolutions process, IPAM recommends that the Board approve the closure of Case 2024/01

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