

**ENVIRONMENTAL AND SOCIAL ASSESSMENT FOR EBRD  
GREENFIELD: CATEGORY B PROJECT**

**JORDAN: NEPCO EASTERN GREEN CORRIDOR SUBSTATIONS**

**Purchase Order Under Contract C006380**

**P.O. Number: 4600003450**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**12 December 2022**

**FIRST DRAFT**

**REV. 0**



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Consultancy Contract “Environmental and Social Assessment for NEPCO Eastern Green Corridor Substation & Associated Facilities”

Document title Environmental and Social Assessment for NEPCO Eastern Green Corridor Substation and Associated Facilities – Stakeholder Engagement Plan (SEP)

Status REV- 0

Date 12 December 2022

Client EBRD

REVISION RECORD			
Rev. No.	Created By	Date	Submission Status
Rev 0	LZ	12 Nov 2022	First Draft
Rev 1	LZ		
Rev 2	LZ		
Rev 3	LZ		

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**ABBREVIATIONS**

CLO      Community Liaison Officer

DLS	Department of Land and Survey
DoA	Department of Antiquities
EIA	Environmental Impact Assessment
ESA	Environmental and Social Assessment
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental & Social Impact Assessment
ESP	Environmental and Social Policy
E&S	Environmental and social
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HSE	Health, Safety, and Environment
JEA	Jordan Engineers Association
JSMO	Jordan Standards and Metrology Organization
kV	Kilovolt
LACP	Land Acquisition and Compensation Plan
MoA	Ministry of Agriculture
MoEnv	Ministry of Environment
MoF	Ministry of Finance
MoH	Ministry of Health
MoL	Ministry of Labour
MoLA	Ministry of Local Administration
MPWH	Ministry of Public Works and Housing
MW	Mega Watt
NEPCO	National Electric Power Company
OHTL	Overhead Transmission Line
PR	Performance Requirement
PSD	Project Summary Document
PV	Photovoltaic
RoW	Right of Way
SEP	Stakeholder Engagement Plan

## 1. INTRODUCTION

### 1.1 Background

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing up to USD 45 million sovereign-guaranteed loan to the National Electric Power Company (“NEPCO”, the “Company” or the “Borrower”), a company wholly owned by the government of Jordan, with a tenor of up to 18 years and a grace period of up to 3 years. The Bank is also working on mobilizing an investment grant of up to USD 5 million or 10% of Project costs from the EU Neighbourhood Investment Platform (EU NIP).

The proceeds will be used to build a new 400/132/33 kV transmission substation and related equipment in the Rihab area located around 61 km North-East of Amman, Jordan – referred to as the North Substation by NEPCO (the “Project”).

The construction of the new substation will strengthen the reliability and stability of the transmission network and improve capacity of the electricity system to absorb existing renewable energy generation in the Northern area, as well as allow for the development of up to 600 MW of additional solar PV generation capacity in the Rihab-Mafraq area.

The new 400 kV substation is considered as Phase I of the Eastern Corridor Project which will ultimately develop additional switching stations and high voltage transmission lines in the north east part of Jordan under Phase II, thus allowing for additional renewable energy capacity to be connected to the grid.

Furthermore, this Project aims to further advance the Bank’s policy engagement in the power sector and builds on the two previous transactions with NEPCO which included significant policy work focused on corporate governance and compliance, and equal opportunities for women and youth.

In addition, the Project involves “associated facilities”, which include an overhead transmission line (OHTL) of around 35 km length, that will be constructed by NEPCO.

The Project is categorised “B” in accordance with the EBRD Environmental and Social Policy (ESP) (2019). An Environmental and Social Assessment (ESA) has been carried out for the Project to identify and assess any potentially significant future adverse environmental and social (E&S) impacts associated with the proposed Project and the associated facilities, assess compliance with applicable national laws and the EBRD ESP and PRs, determine the measures needed to prevent or minimise and mitigate the adverse impacts, and identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project.

The Bank therefore commissioned ECO Consult (the “Consultant”) to carry out the ESA of the Project and the associated facilities (the “Assignment”).

This document is the Stakeholder Engagement Plan (SEP) for the Project, which describes the planned stakeholder consultation activities and engagement process as well as a grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

### 1.2 Project Rationale

The construction of the new substation will strengthen the reliability and stability of the transmission network and improve capacity of the electricity system to absorb existing renewable energy generation in the Northern area, as well as allow for the development of up to 600 MW of additional solar PV generation capacity in the Rihab-Mafraq area.

The new 400 kV substation is considered as Phase I of the Eastern Corridor Project which will ultimately develop additional switching stations and high voltage transmission lines in the north east part of Jordan under Phase II, thus allowing for additional renewable energy capacity to be connected to the grid (See Figure 1).

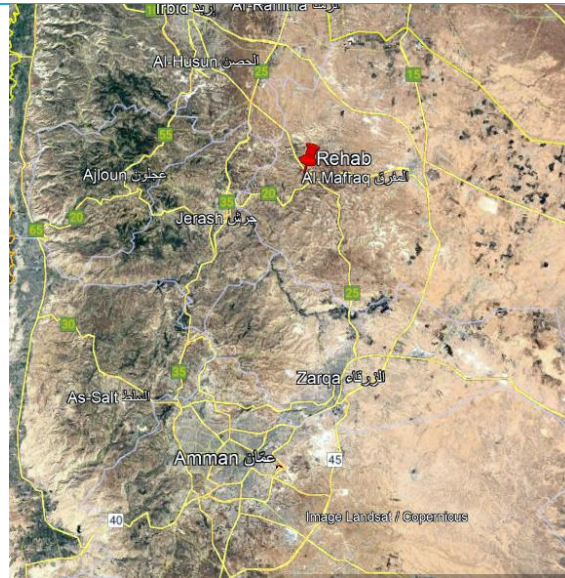


Figure 1: Map Showing Proposed Location of the North Substation

Furthermore, this Project aims to further advance the Bank's policy engagement in the power sector and builds on the two previous transactions with NEPCO which included significant policy work focused on corporate governance and compliance, and equal opportunities for women and youth.

### 1.3 Key Terms and Definitions

Table 1: Key Terms and Definitions

<b>The Project</b>	The development of a new North 400/132/33 kV transmission substation and related equipment in the Rehab area located in Mafraq Governorate around 61 km North-East of Amman, Jordan
<b>The Associated Facilities</b>	Associated facilities are not financed by EBRD as part of the Project but in the view of EBRD are significant in determining the success of the Project or in producing agreed project outcomes. These are NEW facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist. Associated facilities in this case include the Overhead Transmission Line (OHTL) connecting from Al Hashimeyeh area to the North substation. The OHTL will be financed by NEPCO own budget or through other financing sources, but not through EBRD financing.
<b>European Bank for Reconstruction and Development (EBRD)</b>	Is the Bank considering providing up to USD 45 million sovereign-guaranteed loan to implement the Project
<b>National Electric Power Company (NEPCO)</b>	<p>It is a 100% state-owned public shareholding company established in accordance with the General Electricity Law No. 10 (1996) on the 1st of September 1996 and is licensed by the Energy &amp; Minerals Regulatory Commission (EMRC) to undertake the following:</p> <ul style="list-style-type: none"> <li>▪ Operation of power system and demand / supply control (System Operator);</li> <li>▪ Construction, operation and maintenance of system equipment such as transmission lines and substations (Transmission Network Owner);</li> <li>▪ Planning of power system development;</li> <li>▪ Purchase of electric power from power producers as single buyer and supply of the power to distribution companies and bulk consumers via the National Control Centre (at Amman South). At the moment, the dispatch is done based on a manual system;</li> <li>▪ Procurement of fuel for thermal power generation; and</li> <li>▪ Import/export of electric power through interconnection with Egypt and Syria.</li> </ul> <p>For this Project, NEPCO will be:</p> <ol style="list-style-type: none"> <li>1. "Borrower" of the loan provided by EBRD</li> <li>2. Project: studies, site selection, land provision and acquisition including related compensation, design, procurement of equipment supply to an external contractor, construction and commissioning of the substation, and operation and maintenance of the substation.</li> <li>3. Associated Facilities: studies, concept planning, preparing the provisional route of the OHTL, providing financing to the construction of the OHTL whether through own internal resources or other external resources, procurement and assigning of the Engineering, Procurement, and Construction (EPC) Contractor, review and approve the detailed design and the OHTL route prepared by the EPC</li> </ol>

	Contractor, implementing compensation procedures for the Right of Way of the OHTL, review documents submitted by the EPC Contractor in relation to the Project and provide approval, supervision of construction works, energising the OHTL, and operation and maintenance of the OHTL. 4. Preparing and submitting reports to the Lender (EBRD) in relation to Environmental and Social (E&S) compliance and implementation of the Environmental and Social Action Plan (ESAP)
<b>Contractor (Substation)</b>	Is the Contractor assigned by NEPCO following an official procurement process. This contractor will be responsible for the provision and supply of equipment for the substation based on tender and bill of quantities provided by NEPCO in the tender documents.
<b>EPC Contractor (OHTL)</b>	Is the Contractor assigned by NEPCO following an official procurement process. This contractor will be responsible for the design, procurement and equipment supply, and construction of the OHTL.
<b>External Consultant</b>	Consultant assigned by NEPCO to assist in undertaking specific Environment and Social measures and commitments and preparing and providing the required reports and documentation to be submitted to EBRD. Consultant contract will be financed by NEPCO.
<b>TC Consultant</b>	Consultant assigned by EBRD to provide specific technical capacity support to NEPCO to implement specific Environment and Social measures and commitments. Consultant contract will be financed by EBRD.

## 1.4 Stakeholder Engagement Plan Objectives

The main purpose of the Stakeholder Engagement Plan (SEP) is to describe how NEPCO intends to communicate with stakeholders during the implementation of the project including but not limited to: potentially affected communities, employees, suppliers and beneficiaries during the project life and how it will be effectively managed, without negatively impacting the project. The SEP will ensure that stakeholders are engaged throughout the project lifecycle.

The objectives of stakeholder engagement within the context of the project are the following:

- Identifying the main stakeholders of the project and their potential concerns.
- Inform the identified stakeholders about the project and its proposed activities through appropriate engagement channels.
- Provide the opportunity for identified stakeholders to participate in the process of identifying any potential impacts.
- Ensure appropriate approach and adequate focus is adopted during the project implementation.
- Ensure that the identified stakeholders are appropriately engaged on issues that potentially affect them in addition to managing the Public Grievance mechanism that will be adopted by NEPCO during project implementation, especially during any construction activities.
- Establish and maintain an ongoing relationship with the stakeholders affected (positively or negatively) by the project.
- Establish, maintain, and improve the worker-management relationship, and ensure that the workers grievance mechanism is accessible, and workers/employees concerns are addressed in a timely manner.
- Engaging with existing workers and/or workers organisations whenever applicable in accordance with the Jordanian Labour Law.

## 2. DEFINITION OF THE PROJECT AND ASSOCIATED FACILITIES

### 2.1 The Project

#### 2.1.1 Substation Location

As mentioned above, the Project involves the building of a new 400/132/33 kV transmission substation and related equipment in the Rihab area located in Mafraq Governorate around 61 km North-East of Amman, Jordan. NEPCO has provided two options being considered for the location of the substation. These potential locations are as follows and is shown in Figure 2:

- Option 1: land “Tamirah” which is around 120 dunums (0.12 km<sup>2</sup>)



- Option 2: land “Albarakeh” which is around 18 dunums (0.018 km<sup>2</sup>)



Option 1 for substation location - Land “Tamirah”



Option 2 for substation location - Land “Albarakeh”

**Figure 2: Map Showing the Two Proposed Alternative Land Locations for the North Substation**

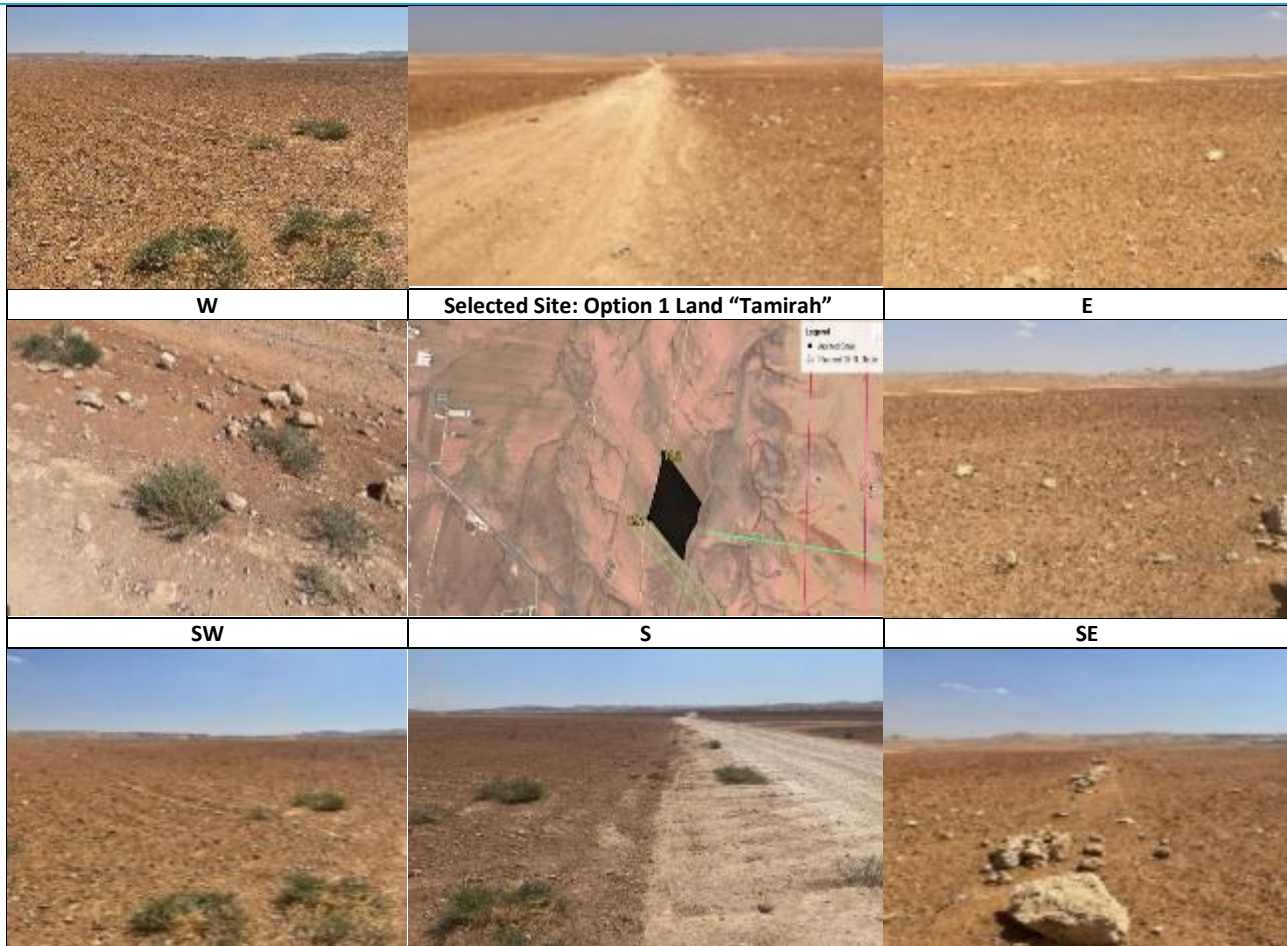
Following a site assessment undertaken by the Consultant and another undertaken independently by NEPCO, the following is decided in relation to the **Project (the substation)**:

- Both lands are vacant, infertile, privately owned, and both with no existing current land use or productive use by the legal land owner or other informal land users such as farmers or herders.
- There are residents near option 2 land “Albarakeh” and it has no access (no entrance/exit) except through community localities and the land area is very small for the substation needs
- There are several agricultural activities taking place around option 2 land.
- Option 1 land has a larger land area, is not within proximity to communities and localities, and there are no existing land uses in the surrounding areas. There are no settlements, or obvious sensitive receptors nearby. As such, the Consultant and NEPCO have decided to go ahead with option 1 land “Tamirah”.
- The option 1 land consists of 10 independent adjacent land plots which are collectively owned by 172 persons. NEPCO will acquire three (3) land plots completely, and parts of the other seven (7) land plots.

Photos taken from option 1 land are included below in Figure 3.

NW	N	NE
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**Figure 3: Photos of the Selected Site for the North Substation - Option 1 Land "Tamirah"**

The selected location for the substation is privately owned and thus NEPCO could decide to undertake a direct negotiation and purchase the land plots from their owners. However, given the large number of land owners, according to NEPCO, this would be a difficult and time-consuming process. According to article No. 180 within the Real Estate Law No. 13 of 2019 issued by the Ministry of Finance, land acquisition without negotiation with the land owners for a public benefit project is permitted by law, if the negotiation process for the project was found difficult.

According to NEPCO, they will move forward with land acquisition directly without any direct negotiation with the owner(s) because the project is considered a public benefit project, and, due to the huge numbers of owners and the need to implement the project on a fast-track basis, it will be difficult to reach all owners to negotiate price. According to NEPCO, they are authorised by the law to acquire the land plots directly without negotiations with the owners due to these reasons.

This involuntary land acquisition process would trigger EBRD PR5 which is related to "Land Acquisition, Involuntary Resettlement and Economic Displacement". This is investigated and assessed by the Consultant in a separate "Resettlement Framework" (RF) report. While NEPCO will carry out the land acquisition and compensation process in accordance with the local/national relevant legislations in Jordan (the Real Estate Law No. 13 of 2019), some additional measures will be required to be implemented by NEPCO in accordance with EBRD PR5, which are outlined in the RF Report.

### 2.1.2 Substation Components

A substation is an installation that interconnects elements of an electric utility's system. These elements can include generators, transmission lines, distribution lines, and even neighbouring utility systems. An electrical substation is a part of an electricity generation, transmission and distribution system where voltage is

transformed from high to low or in reverse using transformers. It also serves as a point of connection between various power system elements such as transmission lines, transformers, generators and loads. To allow for flexibility in connecting the elements, circuit breakers are used as high-power switches. Electric power may flow through several substations between generating plant and consumer, and may be changed in voltage in several steps. There are different kinds of substation such as Transmission substation, distribution substation, collector substation, switching substation and some other types of substations. The North Substation is a transmission substation. The general functions of a substation may include:

- voltage transformation
- connection point for transmission lines
- switchyard for network configuration
- monitoring point for control centre
- protection of power lines and apparatus
- Communication with other substations and regional control centre

The key components of the substation are the following: Power transformer, Current transformer, Voltage Transformer, Supervisory Control and Data Acquisition (SCADA) panels, Alternating Current (AC) panels, Direct Current (DC) system, Reactive power system (Static Synchronous Compensator (STATCOM)) - depends on the project, Surge Arrestor, Low Voltage (LV), Medium Voltage (MV) and High Voltage (HV) cables, SCADA Parts and sensors, Servers, Isolators, Gantries, MV Switch gears, Earthing system, Metering panels, billing system, control and protection panels, lighting system, capacitor bank, reactor, and Disconnectors.

NEPCO develops the basic design to include layouts, Single Line Diagram (SLD), structures, etc. for the substation. However, the final design should be provided by the contractor, it shall be developed according to NEPCO requirements and keeping according to international standards in view the functional requirement of the line and substation facilities to meet the major technical parameters and project parameters.

The substation is connected to the network through overhead lines.

Figure 4 below shows a typical view of a substation.



Figure 4: Typical View of a Substation

### 2.1.3 Substation Development Timeline, Phases, and Activities

- Construction and operation requirements for the substation:
  - Substation construction and operation requirements is determined by the NEPCO's Planning Department and provided to the Design Department. The layout of the substation is developed by the Design Department. The Civil Works Department is responsible for developing the layout of the associated infrastructure and utilities such as access roads, offices, etc.
  - The Execution Department and Civil Works Department are responsible for the construction works internally by NPECO staff. A Contractor is assigned through a tendering process to supply the equipment only and NEPCO does not require a Contractor to undertake the construction of the substation.
- Provisional Timeline:
  - Substation Commercial Operation Date (COD) targeted date is quarter 4 of 2026.
  - The planning decision is expected to take six months from the approval of the Council of Ministers to the land acquisition.
  - Total duration of the project phases is approximately 24 – 26 months as outlined below:
    - ✓ Tender phase to assign EPC Contractor is expected to take 5 – 6 months.
    - ✓ Design phase from letter of award (LOA) to supply of goods is expected to be 12 – 14 months.
    - ✓ Construction phase is around 6 – 7 months.
- After the design, tender and procurement, the key activities during the construction phase are anticipated to include the following:
  - Establishing the work zone, fencing it off and using signs to ensure the safety of the access points.
  - Preparing the substation site which involves ground levelling and earthwork.
  - Excavating and laying foundations such as building the formwork, installing the reinforcements and pouring concrete.
  - Installing the grounding grid for the safety of people and the equipment.
  - Building the command building for the equipment.
  - Backfilling the foundations and substation yard.
  - Assembling the steel structures.
  - Installing the electrical equipment and connecting them to the control room.
  - Carrying out the final inspection.

## 2.2 The Associated Facilities

Associated facilities are not financed by EBRD as part of the Project but in the view of EBRD are significant in determining the success of the Project or in producing agreed project outcomes. These are NEW facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.

Associated facilities in this case include the Overhead Transmission Line (OHTL) connecting from Al Hashimeyeh area to the North substation. The OHTL will be financed by NEPCO own budget or through other financing sources, but not through EBRD financing.

The EBRD will be financing the implementation of the 400 kV substation in the Rihab area, but not of the OHTL from Al Hashimeyeh area to the North substation. Though the OHTL is considered as associated facilities to the Project, the EBRD's ESP 2019 and its PRs require that the environmental and social appraisal of the project to



include the assessment of the environmental and social risks and impacts of associated facilities as well as their management in accordance with the applicable laws, EBRD PRs, and Good International Industry Practice (GIIP).

### 2.2.1 OHTL Route

NEPCO provided a provisional route for the OHTL. The Consultant undertook a drive through and assessed all the accessible parts of the alignment. Figure 5 below shows the provisional OHTL route provided by NEPCO.



**Figure 5: Provisional Route Provided by NEPCO for the OHTL Connecting from Al Hashimeyeh Area to the North Substation**

The OHTL alignment generally passes through private land with some existing land use activities, agricultural areas with trees and crops, forest (haraj) areas, houses and buildings, and others. According to discussion with NEPCO, this alignment is only a provisional route that will be finalised after a Contractor is assigned through an open tendering process and NEPCO will require the Contractor to undertake a site survey and review of land documents from the Department of Land and Survey (DLS) and from relevant municipalities to avoid (to the extent possible) existing and future land use activities and users. According to NEPCO, the final design of the OHTL will not overlap with any residential buildings/houses.

NEPCO does not acquire the land for the Right of Way (ROW) for the OHTL and only compensates the land owners for potential losses and land use limitations that may arise due to the OHTL passing through their land. This is done in accordance with the General Electricity Law No. 64 of 2002. This compensation process will also be covered in the RF report prepared separately and will provide measures to bridge gaps identified between the process carried by NEPCO and the EBRD PR5 requirements.

### 2.2.2 OHTL Components

The key OHTL components include:

- **Transmission Towers:** The main component of the OHTL is the transmission towers. The transmission tower will be a Lattice Steel Structure designed to be three (3) Phases, Double-Circuit Transmission Towers (DCT), which will be the carrier of the conductors that will transport the electrical power between both ends of the transmission line and connect the substation with the High Voltage National Grid. The typical structure of the DCT tower is presented in Figure 6 below. The number of towers that will be distributed throughout the routes is still unknown. Generally, for such projects, NEPCO adopts a maximum tower height of 49.65 m and a minimum height of 30.00 m for 132kV transmission line towers, and a maximum tower height of 70.70 m and a minimum height of 49.00 m for 400kV transmission line towers. The number of towers, tower

spotting, the height of each tower, and towers' final location, and the final route with its buffer will be determined at a later stage as part of the detailed design studies to be undertaken by the EPC Contractor which will be assigned by NEPCO at a later stage.

Each transmission tower will consist of the following:

- **Foundations:** each tower will be fixed to the ground through reinforced concrete foundations (Pad and Chimney). The exact area for each foundation was not provided by NEPCO but it will be determined at a later stage as part of the detailed design, since the area of each foundation and the tower area between legs depend on many variables including tower type, soil type, and tower extension.
- **Basic Tower Body:** the second part of the transmission tower, it is connected to the foundation chimney by stubs (embedded steel member in the foundation – connected to main tower leg), and carries the cross arms and all other tower accessories.
- **Cross-Arms:** each tower will have six (6) steel beam cross arms (3 on each side) which carries the conductors and their insulators strings (discussed below) with the towers (refer to Figure 6 below).
- **Conductors:** The conductor is the conductive part of the line used to carry electrical energy from one tower to the next until its connection with the High Voltage National Grid. Number of conductors in each line depends on the lines characteristics which was mentioned earlier. Conductors to be used for the lines are AAAC Yew for 32kV lines, ACSR/ACS 560/50 for 400kV lines, and ACCC for the upgradation part of 132kV as HTLS conductors.
- **Insulators Strings:** Components that are used to connect the conductors to the cross arms of the towers, and keeping them insulated and away from any nearby grounded structure. These strings are generally of two (2) types; Suspension, and Tension insulator strings.
- **Earth wire/ OPGW:** Optical ground wire (OPGW), same as conductors, the OPGW is a conductive part of the line but it is not used for the electrical power transmission. The conductive part of the cable serves to bond adjacent towers to earth ground, and shields the high-voltage conductors from lightning strikes. The OPGW cable is run between the tops of high-voltage transmission towers and pylons.  
The optical fibers within the cable can be used for high-speed transmission of data, either for the electrical utility's own purposes of protection and control of the transmission line, for the utility's own voice and data communication, or may be leased or sold to third parties to serve as a high-speed fiber interconnection between cities.
- **Infrastructure Elements:** Based on discussions with NEPCO, the only infrastructure requirements for the Project will be access roads, which might be required in areas where the towers are inaccessible based on existing site conditions. Such access roads are required for access of construction vehicles and machinery during construction and for maintenance activities during operation. The layout of the access roads within the Project site will be determined at a later stage as part of the detailed design to be prepared by the EPC Contractor.

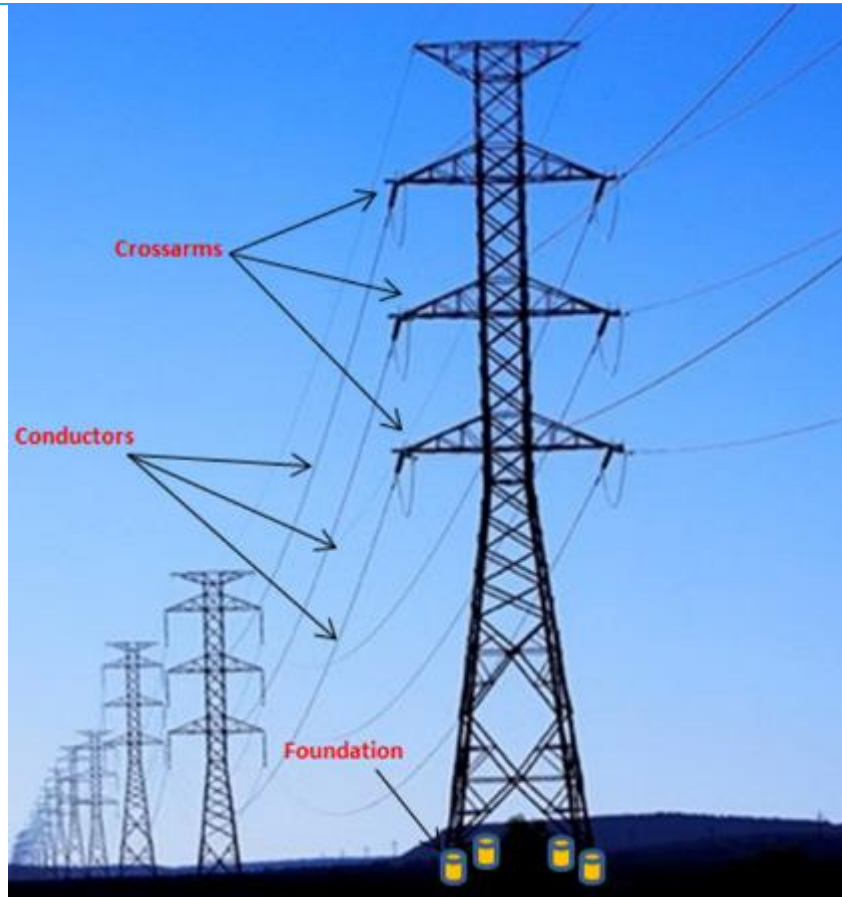


Figure 6: Typical Structural Components of DCT towers



Figure 7: Typical View of an OHTL

### 2.2.3 OHTL Development Timeline, Phases, and Activities

- Timeline for the OHTL development:
  - Total duration of the project phases is approximately 26 months as outlined below:
    - ✓ Total duration for tender document preparation is 2 months in addition to tender evaluation for a period of 2-3 months. The Contractor assigned requires 2 months for the site surveys. Total period is around 6 months.
    - ✓ The review period of the detailed site survey report by NEPCO takes around 21 days during which NEPCO will announce in the newspapers regarding the planned OHTL and giving land owners a



period to submit grievances or objection (15 days period – included within the 21-day period). The final approval for the contractor to start the construction works is issued after 15 days of making the announcement. The contractor submits the OHTL towers spotting during the review period (21 days) or the announcement period (15 days), or afterwards.

- ✓ The final approval for the contractor to start the construction works is issued after 15 days of making the announcement if the OHTL towers spotting was submitted.

- Construction phase is around 20 months.

- After the design, tender and procurement, the key activities during the construction phase are anticipated to include preliminary and construction works as follows:

- Preliminary works will relate to the route selection, reconnaissance and preliminary surveys, as well as approvals and clearances.
- Construction activities will involve:
  - ✓ Detailed survey and plotting of profile
  - ✓ Tower spotting and tower schedule
  - ✓ Check survey and location marking
  - ✓ Stub setting
  - ✓ Erection of towers and fixing of accessories
  - ✓ Stringing of conductors and earth wire
  - ✓ Earthing
  - ✓ Protection of tower footings
  - ✓ Clearing of Right of Way
  - ✓ Final checking, testing and commissioning
- Energising of the OHTL by NEPCO

### 3. REGULATORY CONTEXT

This SEP was developed to comply with the legislation and policy regulations of Jordan and the information disclosure, consultation and stakeholder participation requirements of EBRD. These requirements are summarised below.

#### 3.1 Relevant Jordanian Stakeholder Engagement Requirements & Legislation

In Jordan, there are no specific requirements to undertake public consultation or stakeholder engagement during project development, with the exception of consultation during the scoping stage of an Environmental Impact Assessment (EIA) for projects that fall under category 1 under the Environmental Classification and Licensing Regulation No. 69 of 2020 and its amended Regulation No. 97 of 2020. As this project falls under category 1, the project requires the preparation of a comprehensive EIA, and thus, a scoping or consultation session is required.

#### 3.2 EBRD Requirements

The EBRD considers stakeholder engagement as an essential part of good business practice and a way of improving the quality of projects. As a result, the implementation of the proposed project should comply with the EBRD policies. Stakeholder engagement will be an ongoing process throughout the project, in order to ensure transparency with all stakeholders that may be affected by, or have influence on, the project.

The relevant EBRD requirements within the context of the proposed project include the following:

- EBRD’s 2019 Environmental and Social Policy (ESP) particularly the following Performance Requirements (PRs):
  - PR1: Assessment and Management of Environmental and Social Impacts and Issues
  - PR10: Information Disclosure and Stakeholder Engagement.
- EBRD’s Grievance Management Guidance Note.
- EBRD’s commitment to disclosing project information as set out in the EBRD’s 2014 Public Information Policy (PIP) document.

In order to fulfil EBRD’s requirements, it is recommended that NEPCO follows a stakeholder engagement process to provide stakeholders with access to timely, relevant and understandable information, and to identify relevant internal and external stakeholders and engage them throughout the project to ensure effective communication.

This stakeholder engagement plan is designed to be proportionate to the nature and scale of the project and its potential impacts and shall take identified stakeholders into consideration during decision making process and future planning, based on clearly defined roles and responsibilities.

#### 4. IDENTIFICATION OF STAKEHOLDERS

The first step in successful stakeholder engagement is for the client to identify the project-affected parties and those who have interest in the project, and/or the ability to influence its outcomes (positively and negatively / permanently or temporarily).

Based on this definition, stakeholders for the project are classified into two main groups, which are:

- Affected Parties: who are individuals or groups affected or likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods.
- Interested Parties: who represent individuals or groups that may have an interest in the project due to its location, characteristics, impacts, or matters related to public interest.

Table 2 below lists down the key stakeholder groups that have been identified to date. The list can be updated as the project proceed.

**Table 2: Identified Group of Stakeholders**

Stakeholder		Description	Degree of Project Influence
<b>Interested Parties</b>			
National Electric Power Company (NEPCO)		▪ The owner and operator of the Project, and will be the prime stakeholder to make decisions on all aspects of project implementation. It will also be responsible for designing and building the substation and the OHTL.	High
European Bank for Reconstruction and Development (EBRD)		▪ Project financier, and will be responsible for the monitoring of safeguard compliance; supervision of project, initiation and review of Environment, Health, Safety, and social (EHSS) documentation and provision of clearance to initiation of civil works to the Project.	High
National Authorities	Ministry of Labour (MoL)	▪ Regulatory role in the project and responsible for monitoring the employers’ compliance with the Labour Law.	Low to Medium
	Directorate of Civil Defence	▪ Involved in approving technical designs and drawings and providing emergency services during the project implementation.	Medium to High
	Ministry of Health (MoH)	▪ Regulatory role in the project: includes issues related to the public health of the nearby communities	Low to Medium
	Ministry of Environment (MoEnv)	▪ Regulatory role in the project, and responsible for the approval of the ESIA Study and making sure it complies with the “Environmental Classification and Licensing Regulation No. 69 of 2020 and its amended Regulation No. 97 of 2020”. It will also be responsible for granting the environmental clearance	High

Stakeholder		Description	Degree of Project Influence
		for the Project, as well as ensuring implementation of environmental protection measures related to the Project	
	Ministry of Finance (MoF)	Regulatory role in the project: specifically includes Law No. 13 of 2019 which allows for land acquisition	Low
	Ministry of Agriculture (MoA)	Regulatory role in the project: includes land use issues related to grazing reserves and forest lands as well as potential impacts related to biodiversity.	Low
	Department of Antiquities (DoA)	Regulatory role in the project: includes issues related to archaeology and cultural heritage related to the Project.	Low to Medium
	Ministry of Local Administration (MoLA)	Will be involved in changing designation of land use for the Project, if required.	Low to Medium
	Ministry of Public Works and Housing (MPWH)	Will be involved in ensuring transportation activities are properly managed.	Low to Medium
	Jordan Engineers Association (JEA)	Involved in reviewing technical drawings and granting construction permit for the Project	Medium
	Municipalities	Responsible for providing infrastructure and utility services	Medium to High
	Jordan Standards and Metrology Organization (JSMO)	Regulatory role in the project: includes issues related to standards applicable to the Project such as air quality.	Low to Medium
<b>Affected Parties</b>			
	Private Land Owners	This includes private owners of the land where the substation will be constructed as well as owners of the lands through which the OHTL will pass.	High
	Local Communities	This includes nearby residents, vulnerable groups (persons with disability, elderly people, youth, and local women), local businesses, and Community based Organisations (CBOs).	Medium
	Local Herders and Grazers	Those who engage in grazing activities, and might be present at or near the proposed sites during certain periods of the year.	High
	Private Suppliers	This includes suppliers for the substation as well as the site needs (i.e., food, construction materials, etc.)	Low to Medium
	Contractors and Subcontractors	Those who will be engaged in the construction activities during the implementation of the project	Low to Medium
	Employees/workers	This includes workers involved in the Project's operational and construction activities	High

## 5. STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN

A stakeholder engagement action plan has been developed as shown in Table 3. Engagement is an ongoing process that is integrated into the project lifecycle to ensure that issues that may have an impact on the local community are taken into consideration from the design until closure.

NEPCO HSE Department will have a focal point throughout the project lifecycle that acts as a Community Liaison Officer (CLO) to implement the SEP and to communicate with stakeholders when needed during the planning and construction phase. Also, this CLO will be responsible to implement the SEP during the operation phase.

During the planning phase, NEPCO CLO will carry out the Stakeholder engagement activities internally and externally. As construction of the project commences, the CLO will be responsible for the community liaison activities pertaining to this project in addition to recording and documenting any consultation session that takes place relating to the project, if applicable. Furthermore, the CLO must manage and document grievances as appropriate based on the grievance mechanism proposed in this document.

NEPCO will be responsible for undertaking the stakeholder engagement and information disclosure activities during the planning phase. Also, during the construction phase, engagement activities will be undertaken by NEPCO CLO who will be responsible to implement the SEP on aspects relevant to the construction phase, as well as managing the implementation of the project grievance mechanism. Moreover, the CLO shall incorporate summaries of any grievances into the monthly and quarterly reports to the EBRD along with copies of the grievance log.

- During the operation phase, NEPCO shall continue implementing stakeholder engagement and managing grievances. For PR5 “Land Acquisition, Involuntary Resettlement and Economic Displacement”, NEPCO will:
  - NEPCO to undertake consultation activities with relevant stakeholders (land owners and land users) to inform them about the Project (North substation) and the accompanying new OHTL, their locations, construction schedule and grievance mechanism before undertaking the land acquisition process.
  - NEPCO to ensure all related stakeholders in relation to the substation and the OHTL are identified and consulted with and ensure rights and compensation values are sufficiently documented during the census and land valuation and acquisition process.
  - NEPCO to appoint qualified consultant to develop and implement the Resettlement Plan in accordance with the national legislations with increased consultation and information disclosure, and to monitor the land acquisition and compensation process to verify it meets the requirements of the Resettlement Plan.
  - The Resettlement Plan will also identify any vulnerable individuals and groups who will need additional mitigation and consultation measures.
  - Develop and implement a grievance redress mechanism.
  - Appoint a person to be the primary point of contact within NEPCO regarding the land acquisition and compensation program.
  - At completion of land acquisition and compensation, NEPCO to audit the completed program.

It should be noted that an updated SEP is to be submitted at the end of the planning phase and the SEP should continue to be regularly updated during the operation phase as necessary.

Table 3: Stakeholder Engagement Strategy and Plan

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
<b>Affected Stakeholders</b>				
<ul style="list-style-type: none"> <li>Landowners of the selected land for the Substation</li> </ul>	<ul style="list-style-type: none"> <li>Coordination for the acquisition and compensation process</li> </ul>	<ul style="list-style-type: none"> <li>Undertake consultation activities through regular meetings with the owners of the selected land for the substation to inform them about the project and the acquisition and compensation process.</li> </ul>	<ul style="list-style-type: none"> <li>During the Planning and Design Phase</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
<ul style="list-style-type: none"> <li>Owners of lands through which the OHTL will pass</li> </ul>	<ul style="list-style-type: none"> <li>Disclosure of Project information to the landowners and coordination for the acquisition and compensation process (if required)</li> </ul>	<ul style="list-style-type: none"> <li>Undertake consultation activities through regular meetings with the landowners to inform them about the project and the acquisition and compensation process (if required)</li> </ul>	<ul style="list-style-type: none"> <li>During the Planning and Design Phase</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
<ul style="list-style-type: none"> <li>Local communities to include:               <ul style="list-style-type: none"> <li>Nearby residents</li> <li>Community Based Organisations</li> <li>Vulnerable groups</li> <li>Local businesses</li> </ul> </li> <li>Local Grazers</li> </ul>	<ul style="list-style-type: none"> <li>Disclose information and outcomes of the Labour Employment Plan.</li> </ul>	<ul style="list-style-type: none"> <li>Awareness session shall be held for the local community to inform them on the outcomes of the Labour Employment Plan. The session is to be held in coordination with Local District Office and the Municipality for local community representatives to include elected members of municipal council, elder representatives of tribal groups, CBO's, women and youth groups, unemployed, and local businesses.</li> </ul>	<ul style="list-style-type: none"> <li>Once before construction.</li> <li>Once before operation.</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
	<ul style="list-style-type: none"> <li>Inform the local communities about job opportunities for the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Run advertisements in local newspapers.</li> <li>Post advertisements in Arabic at key local community platforms to include Local District Office, Municipality, CBO's, etc.</li> <li>Post advertisements in Arabic around site/fence for local community grazers to be informed about any job opportunities</li> </ul>	<ul style="list-style-type: none"> <li>When required during construction and operation</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
	<ul style="list-style-type: none"> <li>Disclosure of Project information to local community grazers</li> </ul>	<ul style="list-style-type: none"> <li>Undertake consultation activities with the grazers (through regular site visits to the area in general) to inform them about Project and the grievance mechanism that will be implemented.</li> </ul>	<ul style="list-style-type: none"> <li>Once before construction</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
	<ul style="list-style-type: none"> <li>Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>SEP in Arabic to be disclosed on NEPCO website</li> </ul>	<ul style="list-style-type: none"> <li>Once before construction</li> <li>(Updated when required)</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
		<ul style="list-style-type: none"> <li>Hardcopy of SEP in Arabic to be available at Local District Office and Local Municipality.</li> </ul>		
		<ul style="list-style-type: none"> <li>Summary advertisement in Arabic of grievance mechanism to be posted at key local community platforms to include Local District Office, Local Municipality, CBO's, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Once before construction</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
	<ul style="list-style-type: none"> <li>Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Prepare leaflet in Arabic with updates on project and its environmental and social issues. This could include updates on the project development, number of employment opportunities, the bidding process for project components, construction plans, etc. Leaflet to be disclosed at key local</li> </ul>	<ul style="list-style-type: none"> <li>Semi-annually during construction and annually during operation</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>

## Stakeholder Engagement Plan (SEP) – NEPCO Eastern Green Corridor Substations/Jordan

Stakeholder		Objectives	Communication Methods and Tools	Timeframe	Responsibility
			community platforms to include Local District Office, Local Municipality, CBO's, etc.		
Private Suppliers		<ul style="list-style-type: none"> <li>Coordination for providing needs for the project (i.e., food, construction materials, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Run advertisements in local newspapers and company website</li> </ul>	<ul style="list-style-type: none"> <li>During the bidding process</li> <li>During the construction phase</li> </ul>	NEPCO
<ul style="list-style-type: none"> <li>Contractors and Subcontractors</li> </ul>		<ul style="list-style-type: none"> <li>Coordination for engagement in the construction activities during the implementation of the Project</li> </ul>	<ul style="list-style-type: none"> <li>Run advertisements in local newspapers and company website</li> </ul>	<ul style="list-style-type: none"> <li>During the bidding process</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
<ul style="list-style-type: none"> <li>Employees / Workers</li> </ul>		<ul style="list-style-type: none"> <li>Disclosure of Project information</li> </ul>	<ul style="list-style-type: none"> <li>Awareness and training sessions shall be held for the employees/workers to inform them about the project risks and grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>During construction</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
<b>Interested Stakeholders</b>					
<ul style="list-style-type: none"> <li>EBRD</li> </ul>		<ul style="list-style-type: none"> <li>Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Individual/Internal Meetings (if required)</li> <li>Submission of annual environmental and social report</li> </ul>	<ul style="list-style-type: none"> <li>When needed</li> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> <li>NEPCO</li> </ul>
<ul style="list-style-type: none"> <li>Local Authorities:</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Labour (MoL)</li> <li>Directorate of Civil Defence</li> <li>Ministry of Health (MoH)</li> <li>Ministry of Finance (MoF)</li> <li>Ministry of Agriculture (MoA)</li> <li>Department of Antiquities (DoA)</li> <li>Ministry of Local Administration (MoLA)</li> <li>Ministry of Public Works and Housing (MPWH)</li> <li>Jordan Engineers Association (JEA)</li> <li>Jordan Contractors Association (JCA)</li> </ul>	<ul style="list-style-type: none"> <li>Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the project</li> </ul>	<ul style="list-style-type: none"> <li>Individual/Internal Meetings (if required)</li> <li>Correspondence and official letters (if required)</li> </ul>	<ul style="list-style-type: none"> <li>When needed</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>
		<ul style="list-style-type: none"> <li>Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>Prepare leaflet in Arabic with updates on project and its environmental and social issues. This could include updates on the project development, number of employment opportunities, the bidding process for project components, construction plans, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>NEPCO</li> </ul>



## Stakeholder Engagement Plan (SEP) – NEPCO Eastern Green Corridor Substations/Jordan

Stakeholder		Objectives	Communication Methods and Tools	Timeframe	Responsibility
	<ul style="list-style-type: none"> <li>- Ministry of Environment (MoEnv)</li> <li>- Municipalities</li> <li>- Jordan Standards and Metrology Organization (JSMO)</li> </ul>				
	<ul style="list-style-type: none"> <li>- Ministry of Environment (MoEnv)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the project</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual/Internal Meetings (if required)</li> <li>▪ Correspondence and official letters (if required)</li> </ul>	<ul style="list-style-type: none"> <li>▪ When needed</li> <li>▪ When needed</li> </ul>	<ul style="list-style-type: none"> <li>▪ NEPCO</li> <li>▪ NEPCO</li> </ul>
		<ul style="list-style-type: none"> <li>▪ Coordination for list of private contractors approved for collection of hazardous waste from the site to the Swaqa Hazardous Waste Treatment Facility.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Correspondence and Official Letters</li> </ul>	<ul style="list-style-type: none"> <li>▪ Once before construction</li> <li>▪ Once before operation</li> </ul>	<ul style="list-style-type: none"> <li>▪ NEPCO</li> </ul>
		<ul style="list-style-type: none"> <li>▪ Coordination for disposal of any damaged or broken panels to the Swaqa Hazardous Waste Treatment Facility.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual/Internal Meetings (if required)</li> <li>▪ Correspondence and Official Letters</li> </ul>	<ul style="list-style-type: none"> <li>▪ When needed during operation</li> </ul>	<ul style="list-style-type: none"> <li>▪ NEPCO</li> </ul>
	<ul style="list-style-type: none"> <li>- Municipalities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Coordination for the collection of solid waste from the site to the municipal approved landfill</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual/Internal Meetings (if required)</li> <li>▪ Correspondence and Official Letters</li> </ul>	<ul style="list-style-type: none"> <li>▪ Once before construction</li> <li>▪ Once before operation</li> </ul>	<ul style="list-style-type: none"> <li>▪ NEPCO</li> </ul>
		<ul style="list-style-type: none"> <li>▪ Disclose information and outcomes of the Labour Employment Plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ Awareness session will be held for the local community to inform them of the Labour Employment Plan. Session to be undertaken in coordination with the local Municipality.</li> </ul>		
	<ul style="list-style-type: none"> <li>- Department of Antiquities (DoA)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reporting and communication in case archaeological remains are found through construction of project along with chance find procedures implemented.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Individual/Internal Meetings (if required)</li> <li>▪ Correspondence and Official Letters</li> </ul>	<ul style="list-style-type: none"> <li>▪ Upon Occurrence</li> </ul>	<ul style="list-style-type: none"> <li>▪ NEPCO</li> </ul>

## 6. GRIEVANCE REDRESS MECHANISM (GRM)

A grievance is considered to be any complaint about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments have been addressed, and concerns about Project activities during construction or operation, or perceived incidents or impacts. Also, positive feedback and suggestions may be filed via the Grievance Mechanism.

During all project phases, NEPCO will adopt a formalized GRM for the project to monitor and promptly resolve potential conflicts with stakeholders, including the employees and workers, to ensure that all complaints received from any stakeholder are considered and addressed in an appropriate and timely manner. Also, it will allow the public community members and the workers to express their concerns and any complaints directly to NEPCO. NEPCO responsibilities for the grievance management during the project phases are:

- To publicize the GRM procedure and grievance receiving channels for the local community and ensure that they are accessible for the community.
- To inform the workers of the grievance mechanism at the time of hiring, and make it easily accessible to them.
- To implement the GRM.
- To ensure grievance reports are issued on a monthly basis during construction phase and on a quarterly basis during the operation phase.

### 6.1 GRM Procedure

The grievance procedure must consider the following:

- Stakeholders must be aware of the person responsible for receiving complaints.
- Stakeholders have the right to maintain the confidentiality of the grievance procedure and to appeal to a higher level of management if dissatisfied with the original findings.
- Employees have the option to lodge complaints with the Ministry of Labor (MoL) in order to protect their rights.

Accordingly, NEPCO will assign a CLO to publicize the GRM procedure and to receive the grievances from all stakeholders including community members and workers. This assigned CLO must be appropriately trained for receiving and registering any allegations or grievances.

The assigned CLO will be responsible for logging grievances received into the grievance mechanism log and for taking appropriate actions to resolve the grievances. During the resolution of grievances regular communication with the persons that registered the grievances is needed, and records should be maintained of the dates and details of the actions and communication.

NEPCO will be handling two different types of workplace complaints during the operation phase to include:

- Grievances relevant to NEPCO staff and Project workers.
- Grievances relevant to external parties (i.e., Suppliers, service providers, community members, etc.).

The Procedure for the GRM is presented in Table 4, Table 5 and illustrated in Figure 8.

**Table 4: GRM Procedure**

Step	Description of GRM Procedure
Receiving the Grievance	<p>A billboard should be available at the work site to provide contact information for grievances. In addition, to support this information, a project billboard needs to be available at NEPCO Central Offices and at NEPCO North Region Centre at all times for those who wish to refer back to the Grievance Mechanism. The billboard needs to provide the contact information for filing the grievance.</p> <p>Stakeholders, communities and workers can file a grievance through the following:</p> <p><u>Project Site:</u></p> <p>Complaint forms – (copies to be available at project)</p> <p>Email (direct email received)</p> <p>Mobile/Phone number</p> <p><u>NEPCO Central Offices and at NEPCO North Region Centre:</u></p> <p>Suggestions &amp; Complaints Boxes at the premises of NEPCO</p> <p><b><i>*Individuals/entities have the right to request that their name to be kept confidential.</i></b></p>
Grievance Screening and Review	<p>The CLO will investigate the complaint's eligibility for validation purposes.</p> <p>If the claim was rejected for reasons such as being ineligible, has no basis or no action is required, then the CLO must put together a reasonable response within 5 days explaining the reason for rejection to the complainant with evidence where applicable.</p> <p>In case the complainant did not approve of the screening decision, the complainant can raise the grievance a second time to NEPCO.</p>
Grievance Handling, Processing, and Resolution	<p>Once the grievance is investigated and clarified, the CLO will develop and decide resolution options and prepare a response. Grievances will be acknowledged and verified within 2 working days. A resolution/action will be proposed after complaint is verified, and then responded to within a maximum of 5 working days.</p>
Grievance Resolution Agreement	<p>Complaints/Grievances shall be closed when an agreement is reached with those who filed the grievance. This shall be recorded in the grievance log or database accordingly, along with the closing date, and any other supporting documentation or photos to be stored for future reference.</p>
Escalated Grievance Mediation	<p>If the Complainant is not satisfied with the grievance resolution, he/she may raise the grievance to NEPCO HSE Department. NEPCO HSE Department will then review the complaint/grievance where his/her name and contact will be communicated to complainant, if still not satisfied, he/she can revert to court for a resolution.</p>

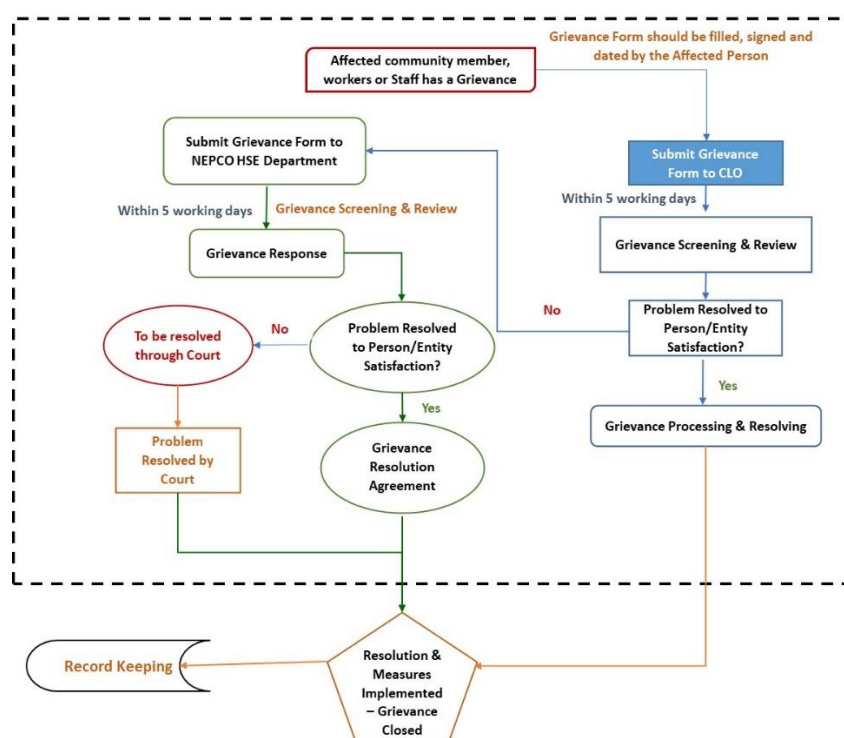


Figure 8: Illustration of the GRM procedures

Table 5: The Grievance Form

Grievance Form (نموذج الشكاوى)			
Reference No (رقم المرجع):		Date التاريخ	
Employee / Worker Name الاسم		Job Title المسمى الوظيفي	
Anonymous submission إخفاء معلومات مقدم الشكاوى	I want to remain anonymous (أرغب بعدم الكشف عن هويتي)		
Details of Event Leading to Grievance تفاصيل الحدث المؤدي إلى الشكاوى			
Date, Time, and location of Event تاريخ، وقت، مكان الحدث		Witness(es), If applicable الشاهد / الشهود (إن ينطبق)	
Please mark how you wish to be contacted (mail, telephone, e-mail). يرجى تحديد الطريقة التي تريد أن يتم الاتصال بك بها (هاتف، بريد إلكتروني)		By Telephone (من خلال الهاتف): _____ By E-mail (من خلال البريد الإلكتروني): _____	
Description of Event: وصف الشكاوى		What happened? Where did it happen? Who did it happen to? What is the result of the problem? ماذا حدث؟ أين حدث هذا؟ من فعل ذلك؟ ما هي نتيجة المشكلة	
Date of Incident/Grievance: تاريخ الشكاوى	One time incident/grievance (Date _____) موضوع الشكاوى حدث لمرة واحدة فقط Happened more than once (how many times? مرة من _____) موضوع الشكاوى حدث أكثر من مرة On-going (currently experiencing problem) مستمر موضوع الشكاوى		
What would you like to see happen to resolve the problem? ما هو رأيك مقترحك لحل المشكلة			
Employee signature: توقيع الموظف			
Grievance received by Name, Title, Signature: تم استلام الشكاوى من قبل (الاسم / المسمى الوظيفي)			

## 6.2 Grievance Register

It is important that issues raised by the stakeholders are recorded in a logical and systematic way so that they can be tracked through to appropriate resolution and closure. The register will record:

- Reference number for the stakeholder;
- Name and contact details (unless requesting anonymity);
- Date of contact(s);
- Issue(s) raised (comment, suggestion, question, complaint, etc.);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholders raise similar issues, these will be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

### 6.3 Confidentiality/ Data Management

If a Complainant wishes to remain anonymous this will be accepted. No personal data will be made public. Details of the grievance will only be provided to those directly involved in the examination process (i.e., those involved with remedying the grievance). If confidentiality cannot be guaranteed, for example because of government regulations, NEPCO can suggest to lodge grievances under an alias.

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period as required by relevant laws and regulations on Data Privacy.

## 7. MONITORING AND REPORTING

The monitoring process will ensure that all stakeholders have been appropriately and effectively consulted throughout engagement process, it also contributes to increasing the efficiency of stakeholder engagement activities as the project progresses.

Consultation and stakeholder engagement will continue throughout Project planning, construction, and operation phases. As discussed above, NEPCO and the main contractor will be responsible for ensuring good relationships with the local communities during the construction phase. NEPCO, with the assistance of the implementation Consultant (IC), will report on community engagement and grievance issues, as well as submit the results of social and environmental monitoring to the EBRD.

During operation and maintenance, NEPCO will maintain relationships with local stakeholders and be responsible for reporting on Project performance.

This SEP identifies various activities that require monitoring and reporting, which include the following:

- Project information disclosure activities.
- Stakeholder consultations/interviews.
- Grievance mechanism
- Monthly and quarterly reporting.

Minutes of any consultation meetings will include the date, location, purpose of meeting and list of participants.

All original written consultation correspondence, including comments, will be retained as evidence of the consultation process and outcomes. Minutes of meetings, or summaries of individual or informal discussions will also be kept on file and made available on request.

During construction, monitoring of grievances and community engagement will be reported on a monthly basis. The CLO will provide monthly summaries of community grievances and community meetings to the main Contractor's Project Manager who will incorporate these into the monthly construction reports to NEPCO/IC, and the quarterly construction reports to NEPCO/IC. NEPCO shall be also responsible to communicate summary of stakeholder engagement activities and grievances in progress reports to EBRD.

During the operation phase, the CLO will report on grievance monitoring and community liaison to NEPCO Management as well (or equivalent) on a quarterly basis. Analysis of grievance monitoring will be incorporated into the project's annual reporting.

This SEP is considered as a living document, and shall be reviewed periodically during project implementation and updated as necessary.

## 8. CONTACT DETAILS

Throughout the Project, all stakeholders can contact NEPCO through the contact details provided below.

National Electric Power Company (NEPCO)

Telephone: 5858615 6 00962

Fax: 5818336 6 00962

Address: P.O. Box 2310 Amman 11181 Jordan

Website: [www.nepco.com.jo](http://www.nepco.com.jo)

Email: [info@nepco.com.jo](mailto:info@nepco.com.jo)

In addition, NEPCO will provide all relevant information to the public (on website provided above) and which will include but not limited to the following:

- Executive summary of the Environmental and Social Impact Assessment (ESIA);
- Resettlement Framework (RF);
- Stakeholder Engagement Plan (SEP);
- Non-Technical Summary (NTS);

Hard copies will also be available at the central NEPCO Offices in Amman and well as the NEPCO East Region Centre as per details provided above.