



European Bank
for Reconstruction and Development

FICHTNER



Rapid ESIA

Appendix D -
Environmental and
Social Action Plan
(ESAP)

FIS0001727

Jordan: Shallala WWTP Rehabilitation and Expansion – Feasibility Study

Client: EBRD

ENGINEERING  CONSULTING

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1 Introduction

1.1 Purpose of the ESAP

This Environmental and Social Action Plan (ESAP) has been prepared in accordance with the Environmental and Social Policy (2019) of the European Bank for Reconstruction and Development (EBRD) applicable to Category B projects.

The ESAP translates the findings of the Rapid Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), GET and Climate Assessment, and Gender Equality and Human Capital Assessment into a structured, time-bound implementation framework.

The ESAP identifies specific actions required to:

- Address identified environmental and social risks;
- Close compliance gaps;
- Strengthen institutional and operational capacity;
- Ensure alignment with EBRD Performance Requirements (PR1–PR10);
- Integrate climate resilience, resource efficiency, and gender inclusion.

This ESAP constitutes a standalone deliverable and serves as a monitoring instrument during project implementation.

2 ESAP Methodology and Structuring

Each ESAP action includes:

- Unique reference number
- Applicable Performance Requirement
- Risk / Gap Source (ESIA section reference)
- Action description
- Performance indicator
- Responsibility
- Implementation trigger / timeline
- Status (for tracking)
- Means of verification

The ESAP actions have been developed based on the findings of the Rapid ESIA, environmental and social audit, institutional capacity assessment, and stakeholder-related gaps identified during the feasibility stage. Each action directly corresponds to identified risks and compliance gaps, ensuring traceability between assessment findings and mitigation and capacity-building measures.

Actions are categorized by project phase:

1. Pre-Construction
2. Construction
3. Pre-Operation

3 Institutional Responsibilities

Table 3-1: Institutional Responsibilities.

Entity	Role
WAJ	Project Owner, oversight
YWC	Operator, ESAP implementation
PIU	Day-to-day coordination
EPC Contractor	Construction-phase compliance
Owner's Engineer	Technical supervision
EBRD	Monitoring & compliance review
Community Liaison Officer (CLO)	Stakeholder engagement and grievance management
Gender Focal Point	Implementation of gender actions and monitoring

4 ESAP Matrix

4.1 Pre-Construction Phase Actions

Table 4-1: Pre- Construction Phase E&S Actions.

Ref	PR	Risk	Action	Indicator	Responsibility	Timing	Status	Verification
ESAP-01	PR1	Chapter 6 – Institutional capacity gap	Develop and formally adopt ESMS aligned with EBRD PRs	ESMS approved and operational	WAJ/YWC	Prior to EPC tender	Open	Board approval
ESAP-02	PR1	Limited E&S oversight	Appoint dedicated E&S Specialist within PIU	Contracted specialist in place	WAJ	Before loan effectiveness	Open	Appointment letter
ESAP-02A	PR1	Limited stakeholder and gender capacity	Establish E&S management structure including Community Liaison Officer (CLO) and Gender Focal Point	Roles assigned	WAJ	Before construction	Open	Organogram
	PR1	Procurement integration gap	Integrate ESMP, SEP, LMP, OHS, GBVH/SEAH, subcontractor and supply-chain management	E&S clauses included	PIU	Prior to tender issuance	Open	Tender document

			requirements into EPC tender and contract documentation, including monitoring and reporting obligations					
ESA P-04	PR2	Labour framework incomplete	Develop Labour Management Procedure incl. worker GM	Approved LMP	YWC	Prior to construction	Open	LMP document
ESA P-05	PR3	Sludge compliance planning	Prepare Sludge Management Plan (JS 1114-2016 aligned)	Approved SMP	YWC	Before construction	Open	SMP
ESA P-06	PR4	ERP outdated	Update Emergency Preparedness & Response Plan	Updated ERP adopted	YWC	Before construction	Open	ERP copy
ESA P-07	PR10	Stakeholder engagement formalization	Finalize, disclose, and operationalize SEP and project-level Grievance Mechanism (GM), including	Public disclosure evidence	YWC	Before construction	Open	Website evidence

			consultation plan, disclosure methods, and targeted engagement with vulnerable groups					
ESA P-08	GET	Climate resilience integration	Confirm flood resilience & equalization design	Design documents updated	PIU	Before final design	Open	Design drawings
ESA P-09	Gender	Workforce participation gap	Adopt Gender Action Plan	GAP approved	YWC	Before construction	Open	GAP document

4.2 Construction Phase Actions

Table 4-2: Construction Phase E&S Actions.

Ref	PR	Risk	Action	Indicator	Responsibility	Timing	Status	Verification
ESA P-10	PR1	Contractor non-compliance	Develop & implement C-ESMP	Approved C-ESMP	Contractor	Before mobilization	Open	C-ESMP
ESA P-11	PR2	OHS risks	Implement OHS Plan & training	LTIFR < threshold	Contractor	Continuous	Open	OHS reports
ESA P-12	PR3	Dust emissions	Apply dust suppression	Complaints minimized	Contractor	Continuous	Open	Site inspections

ESA P-13	PR3	Construction waste	Implement waste management plan	Waste tracking records	Contractor	Continuous	Open	Waste manifests
ESA P-14	PR4	Traffic risk	Implement Traffic Management Plan	No serious traffic incidents	Contractor	During works	Open	Incident log
ESA P-15	PR6	Vegetation disturbance	Restrict works to footprint	No offsite clearing	Contractor	Continuous	Open	Site audits
ESA P-16	PR8	Chance finds risk	Implement Chance Finds Procedure	No unreported finds	Contractor	Continuous	Open	Incident record
ESA P-17	PR10	Community grievances	Maintain and operate project-level Grievance Mechanism (GM), ensuring grievances are logged, tracked, and resolved within defined timeframe	Grievances resolved within timeframe	Contractor/YWC	Continuous	Open	GM log
ESA P-17A	PR10	Weak stakeholder engagement	Implement SEP during construction including consultation	Engagement log maintained	Contractor/YWC	Continuous	Open	Engagement records

		during construction	ns, disclosure, and communication with affected communities					
ESA P-18	Gender	Workplace harassment risk	Implement non-discrimination and equal opportunity recruitment practices for contractor and subcontractor workforce, supported by contractual clauses and monitored through workforce reporting, including enforcement of anti-harassment and GBVH policies	Training delivered	Contractor	Continuous	Open	Training logs

ESA P-19	GET	Energy efficiency installation	Install high-efficiency equipment	Equipment commissioned	Contractor	During installation	Open	Commissioning report
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4.3 Pre-Operation Phase Actions

Table 4-3: Pre- Operation Phase E&S Actions.

Ref	PR	Gap	Action	Indicator	Responsibility	Timing	Status	Verification
ESAP-20	PR3	Effluent compliance risk	Commissioning & performance testing	Compliance achieved	Contractor/YWC	Before COD	Open	Lab results
ESAP-21	PR3	Sludge disposal	Secure licensed disposal route	Disposal contract signed	YWC	Before COD	Open	Contract
ESAP-22	PR4	Community health framework	Finalize CHS protocol	Protocol adopted	YWC	Before COD	Open	Approved document
ESAP-23	PR1	Monitoring gap	Implement environmental monitoring system	Monitoring operational	YWC	Before operation	Open	Monitoring logs
ESAP-24	GET	GHG baseline gap	Establish operational GHG accounting	Baseline established	YWC	Before operation	Open	GHG report
ESAP-25	Gender	Skills gap	Deliver structured technical training	Training delivered	YWC	Before operation	Open	Attendance sheets

			programme for operational staff (SCADA, CHP, energy optimization and WWTP systems), including participation of women where feasible, using external providers where internal capacity is limited, and integrate training into ongoing operational capacity development					
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4.4 Operational Phase Actions

Table 4-4: Operation Phase E&S Actions.

Ref	PR	Risk	Action	KPI	Responsibility	Frequency	Status	Verification
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ESA P-26	PR3	Effluent non-compliance	Continuous effluent monitoring	≤ reuse limits	YWC	Daily	Open	Monitoring data
ESA P-27	PR3	Odour nuisance	Operate odour control system	Complaint trend declining	YWC	Continuous	Open	Complaint log
ESA P-28	PR3	Sludge quality	Quarterly sludge testing	JS compliance	YWC	Quarterly	Open	Lab report
ESA P-29	PR4	OHS incidents	Periodic safety audits	LTIFR maintained	YWC	Quarterly	Open	Audit report
ESA P-30	PR10	Stakeholder communication	Annual public meeting	Meeting held	YWC	Annual	Open	Minutes
ESA P-31	GET	Energy efficiency	Monitor kWh/m ³	KPI achieved	YWC	Monthly	Open	Energy data
ESA P-32	GET	GHG reduction	Annual emissions report	tCO ₂ e reduced	YWC	Annual	Open	GHG report
ESA P-33	Gender	Inclusion monitoring	Establish and maintain gender-disaggregated HR tracking system covering workforce composition, technical roles, training	% women improved	YWC	Annual	Open	HR data



			participation, and career progression, with annual reporting					
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5 Monitoring and Update Mechanism

ESAP implementation will be monitored through periodic environmental and social performance reports prepared by the Contractor and reviewed by the PIU and Owner's Engineer. Monitoring will include progress against ESAP actions, stakeholder engagement activities, grievance management performance, and gender-related indicators. Consolidated reporting will be provided to lenders as part of regular project monitoring. The ESAP will be:

- Monitored semi-annually;
- Updated if material design changes occur;
- Reviewed annually during operation;
- Integrated into lender reporting.

Serious incidents will be reported within 48 hours in line with EBRD requirements.