



**European Bank**  
for Reconstruction and Development

# FICHTNER



Rapid ESIA

Appendix E – SEP and  
GM Framework

FIS0001727

Jordan: Shallala WWTP Rehabilitation and Expansion –Feasibility Study

Client: EBRD

ENGINEERING  CONSULTING

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# 1 Introduction

This Framework for Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM) has been prepared for the Wadi Shallalah Project to ensure systematic, inclusive, and effective engagement with all relevant stakeholders throughout the project lifecycle. The SEP and the GM are developed in accordance with the EBRD Performance Requirements 2 and 10 (PR2 and PR10). Stakeholders were identified based on the Project Aol, including the service catchment defined under the Aol Section in the Rapid ESIA.

The SEP framework applies to both the construction and operation phases and reflects the scale, risk profile, and Category B classification of the project.

At the time of preparation of this feasibility-stage SEP framework, project-specific stakeholder engagement had primarily been limited to site visits, consultations with YWC/site management, review of existing communication channels, and stakeholder mapping undertaken as part of the Rapid ESIA process. No documented programme of project-specific community consultations had yet been completed under this SEP framework. Accordingly, the engagement approach presented in this section should be understood as the forward-looking framework for disclosure, consultation, and grievance management to be implemented and documented during pre-construction, construction, and operation.

## 1.1 Background

Wadi Shallalah Project involves the rehabilitation and expansion of the existing Shallalah Wastewater Treatment Plant (WWTP), operated by Yarmouk Water Company (YWC), with the objective of increasing the overall treatment capacity to approximately 242,000 population equivalent (PE). The Project aims to improve wastewater treatment performance and environmental compliance, and to support current and future wastewater management needs within the service area. The scope of works includes construction activities largely within the existing plant footprint, associated temporary works, and the subsequent operation of the expanded facilities. During construction and operation, the Project may result in temporary impacts on nearby communities and stakeholders, including construction-related nuisance, traffic and access disruption, and interactions with the project workforce. The Project is classified as a Category B project under the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy and is not expected to involve land acquisition or involuntary resettlement. Stakeholder engagement is therefore a key component of the Project's environmental and social management approach, ensuring that affected stakeholders are informed, consulted in a meaningful manner, and provided with accessible mechanisms to raise concerns throughout the Project lifecycle.

From a social perspective, the Project's impact footprint is expected to remain relatively confined and proportionate to its Category B classification. The proposed works are expected to be undertaken largely within the existing WWTP boundary and associated utility land, with no permanent or temporary land acquisition, no physical or economic displacement, and no significant labour influx anticipated at this stage. The main social impact pathways are therefore expected to relate primarily to

temporary construction nuisance, traffic and access disruption, worker-community interaction, and service continuity considerations rather than resettlement or large-scale community disruption.

In institutional terms, YWC operates the existing plant under the oversight of WAJ and MWI and has an existing operational mandate and site management function; however, the Rapid ESIA identifies that formalized environmental and social systems, structured SEP implementation, and supporting documentation require strengthening to meet full lender expectations. Accordingly, the Project includes specific implementation support and pre-construction actions, including PIU-based environmental and social oversight, appointment of a qualified E&S Specialist, finalization and disclosure of the SEP and project grievance mechanism, and support from the PIS in supervising implementation and stakeholder disclosure. These measures provide the basis for the social outcomes and management commitments set out in this report.

## 1.2 Objectives of Stakeholder Engagement

The objectives of the SEP framework are to:

- Identify project stakeholders and affected parties
- Ensure timely disclosure of relevant project information
- Provide opportunities for meaningful consultation
- Identify and address stakeholder concerns and expectations
- Support the management of social risks and impacts
- Establish transparent communication channels, including a Grievance Mechanism
-

## 2 Regulatory and Policy Framework

This SEP framework is guided by:

- EBRD Environmental and Social Policy (2019)
- EBRD Performance Requirement 10
- Relevant national legislation on public consultation and information disclosure

## 3 Stakeholder Identification and Analysis

### 3.1 Stakeholder Categories

Stakeholders have been identified and grouped as follows:

- Affected Communities: Residents and land users within the Project Area of Influence (AoI)
- Local Authorities: Municipalities, governorate offices, and sectoral authorities
- Service Providers: Utilities, emergency services, and infrastructure operators
- NGOs and CBOs: Local organisations, including those supporting vulnerable groups
- Workers: Direct employees and contractor workers
- Vulnerable Groups: Women, refugees, low-income households, and persons with limited access to services

### 3.2 Stakeholder Analysis

A stakeholder analysis was undertaken to assess:

- Level of interest in the project
- Potential influence on project outcomes
- Key concerns and information needs

This analysis informs the selection of engagement methods and frequency. The outcomes are presented in the stakeholder's matrix in Table 3-1 below.

### 3.3 Stakeholders Engagement Risk Approach

Stakeholder engagement for the Wadi Shallalah Project is prioritised based on a risk-based approach, in line with EBRD PR 10. Stakeholders have been grouped according to their level of potential exposure to project impacts, degree of vulnerability, and influence on project outcomes. This approach ensures that engagement intensity, frequency, and methods are proportionate to risk.

Given the Project's Category B classification, confined footprint, and absence of land acquisition, engagement risks are generally moderate and localised, with higher priority assigned to stakeholders directly affected by construction activities and service continuity.

### 3.4 AoI-Based Stakeholder Mapping and Prioritisation

Stakeholders for the Wadi Shallalah Project have been identified and prioritised based on their location within the Project Area of Influence and their level of exposure to project-related risks and impacts, in accordance with EBRD PR 10. This approach ensures that engagement efforts are geographically focused, risk-based, and proportionate to the Project's Category B classification and confined footprint.

The stakeholder mapping process integrates:

- The Aol tiers defined in Section 2 (Project Site, Immediate Receptors, Service Catchment, Transport Corridors, and Cumulative Zone);
- The nature and magnitude of potential impacts relevant to each Aol tier;
- Stakeholder vulnerability and influence, where applicable.

Stakeholders located closer to the Project site or directly dependent on the WWTP service are prioritised for more frequent and proactive engagement.

Aol-based stakeholder mapping and engagement priority is detailed in Table 3-2 below.

Table 3-1: Stakeholders Matrix

Stakeholder Group	Description	Interest Level	Influence Level	Key Concerns / Expectations	Preferred Engagement Methods
Local Communities	Residents living within and adjacent to the Project Area of Influence	High	Medium	Construction nuisance (noise, dust), traffic safety, access disruption, community health & safety, employment opportunities	Community meetings, briefings, grievance mechanism, information notices
Vulnerable Groups	Women, refugees, low-income households, persons with limited access to services	High	Low	Disproportionate exposure to impacts, access to information, GBVH/SEAH risks, livelihood opportunities	Targeted consultations, gender-sensitive engagement, trusted intermediaries
Local Authorities (Municipal / Governorate)	Municipal councils, local administrative units	Medium	High	Regulatory compliance, coordination during construction, service continuity, public safety	Formal meetings, official correspondence, coordination workshops
Sector Authorities & Service Providers	Utilities (YWC), emergency services, road authorities	Medium	Medium	Protection of infrastructure, emergency response coordination, traffic management	Technical meetings, coordination plans, written notifications
Project Workers (Direct, Contractors, and subcontractors)	Construction contractors, operational workforce, suppliers	High	Medium	Working conditions, OHS, wages, grievance access, non-retaliation	Induction training, toolbox talks, worker GM, site notices, written procedures

NGOs / CBOs	Local civil society organisations, refugee-support organisations	Low–Medium	Low–Medium	Community protection, vulnerable group impacts, transparency	Targeted briefings, information sharing
EBRD	Project lender	High	High	Compliance with PRs, effective risk management, monitoring & reporting	Formal reporting, ESIA/ESAP submissions

Table 3-2: Aol-Based Stakeholder Mapping and Engagement Priority

Stakeholder Group	Aol Tier	Key Exposure / Interest	Engagement Priority
Nearby communities (Howwarah, Boshra, Mghayyer, Sal, Hakama)	Immediate Receptors (Tier 2)	Construction nuisance, traffic, community health and safety	High
Vulnerable households within nearby localities	Immediate Receptors (Tier 2)	Limited coping capacity, community health and safety	High
Communities served by Shallalah WWTP (Al-Husn, Aidoon, As-Sarieh, etc.)	Service Catchment (Tier 3)	Service continuity, public health	Medium-High
WWTP workers and contractors	Project Site (Tier 1)	OHS, labour conditions	High
Road users along access and transport routes	Transport Corridors (Tier 4)	Traffic safety	Medium
Local municipalities and governorate authorities	Service Catchment / Cumulative Zone (Tier 5)	Coordination, permitting	Medium
Sector institutions (water and wastewater)	Cumulative Zone (Tier 5)	Strategic oversight	Low-Medium
NGOs / CBOs	Service Catchment / Cumulative Zone (Tier 5)	General interest	Low
General public outside Aol	Outside Aol	Indirect interest	Low
EBRD	Institutional	Compliance oversight	Formal

## 4 Stakeholder Engagement Program

### 4.1 Engagement Methods

Engagement will be conducted using culturally appropriate and inclusive methods, including:

- Public meetings and community briefings
- Focus group discussions, including separate sessions for vulnerable groups where appropriate
- One-on-one meetings with authorities and key stakeholders
- Distribution of information materials (leaflets, notices)
- Digital communication channels where appropriate

### 4.2 Information Disclosure

The following information will be disclosed:

- Project description and schedule
- Potential environmental and social impacts
- Mitigation measures and management plans
- Grievance Mechanism procedures

Information will be disclosed in accessible formats and in Arabic as the primary language of the local context, with English used where required for regulatory or lender purposes.

### 4.3 Engagement Schedule

Stakeholder engagement for the Project will be implemented in a phased manner, with activities aligned to project milestones and the risk profile of each phase. At feasibility stage, this SEP framework defines the minimum engagement and disclosure actions to be undertaken prior to construction and then maintained through construction and operation.

Pre-construction phase: YWC will disclose the NTS / ESIA summary, information on the project scope, anticipated construction activities, potential environmental and social impacts, proposed mitigation measures, and the project grievance mechanism. Engagement during this phase will include meetings or briefings with local authorities, targeted consultation with nearby communities and vulnerable groups within the AoI, and disclosure of contact points for grievances and information requests. These activities will be undertaken prior to tender finalization and prior to commencement of physical works.

Construction phase: During construction, YWC and the Contractor will provide advance notice of works, traffic or access changes, temporary nuisance risks, and site-specific community health and safety precautions. Engagement methods will include community notices, direct communication with local authorities, targeted meetings where required, and ongoing operation of the grievance mechanism. Additional issue-specific consultations will be undertaken where construction activities may create localized disturbance or where grievances indicate recurring concerns.

Operation phase: During operation, stakeholder engagement will focus on continued information disclosure, operation of the grievance mechanism, communication of material operational changes where relevant, and periodic review of community concerns, including nuisance-related complaints or service-related issues.

For each phase, YWC will maintain a stakeholder engagement log documenting the date, location, participants, methods used, issues raised, commitments made, and follow-up actions. The detailed engagement schedule may be updated as the project progresses, but at a minimum engagement will be triggered prior to commencement of construction, ahead of any activities with the potential to affect nearby communities, and in response to significant grievances or project changes.

Table 3 below provides the proposed engagement schedule:

Table 4-1: Proposed engagement schedule

Project Phase	Stakeholders	Information / Purpose	Method	Indicative Timing
Pre-construction	Local authorities, nearby communities, vulnerable groups	Project overview, ESIA/NTS summary, expected impacts, mitigation, GM access	Meetings, briefings, notices, disclosure materials	Before tender finalization and before start of works
Construction	Nearby communities, road users, local authorities, workers	Construction schedule, traffic/access disruption, nuisance controls, safety information, GM reminders	Notices, targeted meetings, direct notifications, GM	Before key works and throughout construction
Operation	Communities, local authorities, service users	Operational updates where relevant, nuisance/service issues, GM access	Periodic disclosure, grievance channels, targeted meetings if needed	Periodically and as needed

#### 4.4 Engagement with Vulnerable Groups

Specific measures will be applied to ensure meaningful engagement with vulnerable groups, including:

- Targeted consultations
- Gender-sensitive engagement approaches
- Use of trusted intermediaries where appropriate

## 5 Roles and Responsibilities

Effective stakeholder engagement for the Wadi Shallalah Project requires clear definition of roles and responsibilities among the institutions and parties involved in project development, construction, and operation. Given the nature of the Project as an expansion of an existing wastewater treatment plant, stakeholder engagement activities will be closely linked to construction planning, site activities, and ongoing operation of the facilities. The responsibilities outlined in Table 5-1 below are designed to ensure that stakeholder engagement is implemented in a coordinated, transparent, and effective manner, in line with the EBRD PR 10. These arrangements also aim to ensure that stakeholder concerns are identified early, addressed promptly, and appropriately escalated where necessary, while maintaining clear accountability for engagement activities throughout the Project lifecycle.

While YWC will retain overall responsibility for implementation of the SEP and project grievance mechanism, the Rapid ESIA indicates that its current capacity for lender-aligned stakeholder engagement implementation is only partial and requires strengthening for a project of this scale and complexity. In particular, while YWC has existing operational communication channels and site management functions, structured SEP implementation, systematic grievance tracking, formal documentation, and dedicated project-level E&S oversight will need to be reinforced to meet full EBRD requirements. Accordingly, SEP implementation will be supported through the PIU, including a designated E&S Officer, appointment of a Community Liaison Officer or equivalent community interface function, and support from the PIS Consultant for disclosure, consultation, monitoring, and reporting. These arrangements, together with targeted capacity building, are intended to ensure that YWC can effectively fulfil its role as Project Proponent for stakeholder engagement and complaints management.

Table 5-1: Roles and Responsibilities

Party	Key Responsibilities
Ministry of Water and Irrigation / Water Authority of Jordan	<ul style="list-style-type: none"> <li>▪ Policy oversight of the water and wastewater sector in Jordan</li> <li>▪ Strategic guidance to ensure alignment with national policies and regulations</li> <li>▪ Coordination support with relevant national authorities, as required</li> <li>▪ No direct responsibility for day-to-day stakeholder engagement</li> </ul>
Yarmouk Water Company (YWC)	<ul style="list-style-type: none"> <li>▪ Overall responsibility for stakeholder engagement related to the Project</li> <li>▪ Implementation of this SEP framework in line with EBRD PR10</li> <li>▪ Disclosure of project information and facilitation of consultations</li> <li>▪ Establishment, implementation, and oversight of the Grievance Mechanism</li> <li>▪ Appointment of a Community Liaison Officer (CLO) as the primary contact point</li> <li>▪ Maintenance of stakeholder engagement and grievance records</li> </ul>
Local Municipality and Governorate Authorities	<ul style="list-style-type: none"> <li>▪ Support coordination with local communities within the Project Area of Influence</li> <li>▪ Facilitation of communication where required, particularly during construction</li> <li>▪ Support dissemination of information related to construction activities, if needed</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Escalation point for significant stakeholder concerns requiring local authority involvement</li> </ul>
Contractor and Subcontractors (Construction Phase)	<ul style="list-style-type: none"> <li>▪ Compliance with the SEP and Grievance Mechanism requirements</li> <li>▪ Participation in stakeholder engagement activities related to construction works</li> <li>▪ Disclosure of construction schedules and potential disturbances to affected communities</li> <li>▪ Prompt reporting of stakeholder concerns and grievances to YWC</li> <li>▪ Informing all workers about the Worker Grievance Mechanism</li> <li>▪ Ensuring protection against retaliation for complainants</li> </ul>
Supervision Engineer / Project Management Consultant	<ul style="list-style-type: none"> <li>▪ Monitoring contractor compliance with the SEP and Grievance Mechanism</li> <li>▪ Identification and reporting of stakeholder-related issues observed on site</li> <li>▪ Verification that grievances are properly recorded and addressed</li> <li>▪ Reporting stakeholder engagement performance to YWC</li> </ul>
Operator (Operation Phase)	<ul style="list-style-type: none"> <li>▪ Continued responsibility for stakeholder engagement and information disclosure</li> <li>▪ Operation of the Grievance Mechanism during plant operation</li> <li>▪ Contractual obligation of any operators or service providers to comply with the SEP and GM</li> </ul>

## 6 Grievance Mechanism

The SEP is linked to the project Grievance Mechanism, which provides a formal process for stakeholders to raise concerns and receive responses in a timely manner.

The Grievance Mechanism (GM) provides a transparent, accessible, and culturally appropriate process for receiving, addressing, and resolving grievances related to the Wadi Shallalah Project. The GM applies to both community members and project workers and is compliant with EBRD PR2 and PR10.

YWC currently operates existing corporate complaint channels, including a centralized hotline, website-based complaint form, mobile application, and on-site reporting options. These channels provide an initial basis for receipt of stakeholder concerns. However, at the time of this assessment, a fully project-specific grievance mechanism for the Shallala WWTP Rehabilitation and Expansion Project had not yet been demonstrated as fully operational in documented form. In particular, a project-specific grievance register, verified tracking format, and documented performance records were not yet available for review. Accordingly, the Project-specific GM described in this SEP represents the framework to be finalized, disclosed, and operationalized prior to commencement of construction.

### 6.1 Objectives

The objectives of the GM are to:

- Provide a formal channel for raising concerns and complaints
- Ensure grievances are addressed in a timely and fair manner
- Strengthen trust between the Project and stakeholders
- Prevent escalation of issues
- Ensure protection against retaliation

### 6.2 Scope of the Grievance Mechanism

The GM covers grievances related to:

- Construction and operational impacts
- Labour and working conditions
- Community health and safety
- Environmental nuisance (noise, dust, traffic, etc.)
- Access and service disruption
- GBVH and SEAH incidents

### 6.3 Guiding Principles

The GM is based on the following principles:

- Accessibility
- Transparency
- Confidentiality

- Fairness
- Non-retaliation
- Timeliness

## 6.4 Grievance Intake Channels

Grievances may be submitted through multiple channels:

- In-person: Community Liaison Officer or site management
- Telephone hotline: through water and wastewater hotline 117116
- YWC website: [https://www.yw.com.jo/Report\\_Complaint.aspx](https://www.yw.com.jo/Report_Complaint.aspx)
- YWC mobile application, available on iOS and Android platforms
- Written complaint boxes at site offices

Information on the GM will be disclosed to communities and workers.

## 6.5 Grievance Handling Process

Step 1: Receipt and Registration

- Grievances are logged in a grievance register
- Acknowledgement provided within 5 working days

Step 2: Screening and Assessment

- Classification of grievance type and severity
- Assignment to responsible personnel

Step 3: Investigation and Resolution

- Investigation conducted as appropriate
- Proposed resolution communicated within 15 working days

Step 4: Closure

- Grievance closed upon agreement
- Documentation retained

Step 5: Appeal

- Complainants may appeal unresolved grievances

## 6.6 GBVH and SEAH Specific Provisions

GBVH/SEAH complaints will be handled through:

- Confidential reporting channels
- Survivor centred approach
- Referral to appropriate support services
- Limited information sharing on a need-to-know basis

## 6.7 Worker Grievance Mechanism (PR2)

In addition to the general GM, workers will have access to:

- Site-level grievance channels
- Anonymous reporting options
- Protection from retaliation

The worker GM does not limit access to judicial or administrative remedies.

## 6.8 Roles and Responsibilities

- Project Proponent, YWC: Overall GM oversight
- Community Liaison Officer: Day-to-day GM management
- Contractors: Initial grievance handling and reporting

## 6.9 Monitoring and Reporting

GM performance will be monitored through:

- Number and type of grievances
- Resolution time
- Recurring issues

Summary information will be reported to EBRD as part of ESIA/ESAP monitoring.

## 6.10 Communication and Awareness

The GM will be communicated to all stakeholders through:

- Community meetings
- Induction training for workers
- Information materials

## 7 Monitoring, Reporting, and Review

Stakeholder engagement activities for the Wadi Shallalah Project will be monitored and documented to ensure transparency, accountability, and compliance with EBRD PR 10 throughout pre-construction, construction, and operation.

### Stakeholder Engagement Log

YWC, with support from the Contractor during construction, will maintain a structured Stakeholder Engagement Log documenting all engagement activities. The log will record the date and location of engagement, stakeholder groups engaged, purpose of engagement, key issues raised, Project responses, commitments made, and follow-up actions. This will allow stakeholder issues to be tracked to closure and ensure engagement remains inclusive and responsive.

### Grievance Monitoring

YWC will monitor the implementation of the Grievance Mechanism, including the number and types of grievances received, their status (open, resolved, closed), and compliance with the resolution timeframes defined in the Grievance Mechanism. Trends and recurring issues will be reviewed to inform corrective actions. Information related to GBVH/SEAH grievances will be handled confidentially and reported only in anonymised form.

### Reporting and Disclosure

Stakeholder engagement performance will be summarised in periodic Environmental and Social monitoring reports submitted to EBRD, in line with ESAP requirements. These reports will include a summary of engagement activities, key stakeholder issues, and grievance statistics. Where appropriate, a non-confidential summary of stakeholder engagement outcomes will be disclosed to stakeholders through suitable channels.

### Responsibilities and Review

YWC will be responsible for monitoring stakeholder engagement activities, ensuring effective implementation of this SEP, and updating the SEP as necessary. Contractors will support monitoring and reporting by providing relevant information to YWC.

### Stakeholder Engagement Performance Indicators

Stakeholder engagement performance will be monitored using quantitative and qualitative Key Performance Indicators (KPIs) aligned with EBRD PR 10 and the Project ESAP. KPIs are designed to track effectiveness, responsiveness, and inclusiveness of engagement activities across all project phases (Table 5).

Table 7-1: Stakeholder Engagement KPIs

KPI Category	Indicator	Target / Frequency	Responsibility
Information Disclosure	Timely disclosure of project information to stakeholders	Prior to key construction activities	YWC
Community Engagement	Number of engagement activities conducted with stakeholders	As per engagement schedule	YWC / Contractor

Vulnerable Groups	Targeted engagement activities conducted with vulnerable groups	At least once per phase, or as needed	YWC
Grievance Mechanism	% of grievances acknowledged within 5 working days	100%	YWC
Grievance Resolution	% of grievances resolved within defined timeframe	≥90%	YWC
Worker Engagement	% of workers informed of GM and SEP during induction	100%	Contractor
Traffic & Safety Issues	Number of recurring grievances related to traffic or safety	Trend monitored; corrective action if recurring	YWC / Contractor
Reporting	Inclusion of stakeholder engagement summary in E&S reports to EBRD	As per ESAP	YWC