

# **GREATER AMMAN MUNICIPALITY (GAM) SOLID WASTE STAKEHOLDER ENGAGEMENT PLAN**

**February 2015**

**FINAL**

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## 1 INTRODUCTION

The Greater Amman Municipality (GAM) is responsible for undertaking all waste management operations within its boundaries, which accommodates over 4 million people (2014). Waste generation in the GAM service area is currently around 2,500 – 2,700 tonnes per day and reaches 3000 tonnes per day in the fasting month of Ramadan and during Eid celebrations. GAM operate daily collection services from 22 Districts and this waste is generally taken to the East Amman Transfer Station and then transferred in trucks to the Ghabawi landfill.

The World Bank (WB) was initially providing finance to GAM in connection to the Ghabawi landfill, including the installation of a Landfill Gas (LFG) recovery system for 3 cells at Ghabawi and facilities to generate power. The LFG gas recovery system has been implemented for Cell 2 from the WB loan. The European Bank of Reconstruction and Development (EBRD) is now considering providing a sovereign guaranteed loan to GAM to continue the main objectives of the WB Project by financing the completion of the landfill gas recovery system at Ghabawi landfill (the EBRD financed '*Project*').

This Stakeholder Engagement Plan (SEP) outlines the approach and actions GAM will undertake for engagement with external stakeholders<sup>1</sup> and local communities in connection with the proposed EBRD financed Project at the landfill. The SEP includes a grievance mechanism for stakeholders to raise their concerns about the Project at Ghabawi.

In relation to GAM's other facilities (e.g. transfer stations) and waste collection and transport in the 22 Districts in its service area, GAM does have established programmes to communicate with the residents of its service area via the Districts, and its Environmental Directorate – Department of Environmental Studies is responsible for delivery of various waste awareness programmes, especially in schools, which encourage recycling and careful waste management. The SEP does not cover within its scope engagement activities in relation to its other facilities, collection and transport services, issues regarding these can be raised made via District representatives and GAM Head Office.

## 2 GHABAWI LANDFILL FACILITIES & PROJECT DESCRIPTION

### 2.1 GHABAWI LANDFILL

Ghabawi landfill is in the Uhod District around 40 km from Amman in the Eastern semi-arid area and the facility is almost 2 km<sup>2</sup> in area.

The landfill facility was established on military lands, which were unused and undeveloped. The landfill is located outside the Amman city zoning area and in 2003 there was no development close to the landfill. The landfill was established in 2003 to become the municipal landfill serving the entire Greater Amman Municipality. The landfill comprises engineered lined Cells (excavations) for waste, a series of leachate treatment ponds, an Administration Building, a weighbridge and a plant maintenance area. Three cells have already been filled (Cells 1, 2 and 3) and are now closed. Waste is currently being deposited in a Cell 4. Cell 2 is capped and has a LFG recovery system installed and landfill gas is being flared from this cell in a controlled system. Flaring of landfill gas enables the reduction of the greenhouse gas emissions from the landfill but does not generate electricity.

Since construction of the landfill GAM has allowed some development nearby, mainly in waste related land uses. A medical incinerator was built north-west of the landfill however no longer exists and a material recycling facility has been built opposite its western boundary. There is no residential development still in the vicinity of the landfill. However, approximately 1.5 km to the south a military compound is being established opposite the Ghabawi Power Station.

The nearest residences are a large farm situated 2.5 km to the south of the landfill, and a small farm lying 5 km to the southwest. The nearest village – Maduneh - is 8-9 km to the west. There are no communities in the immediate project vicinity. However, since 2008, a military camp is currently being established 1.5 km to the south of the landfill. A main road was built to serve the landfill and the farms that were established after the landfill was built.

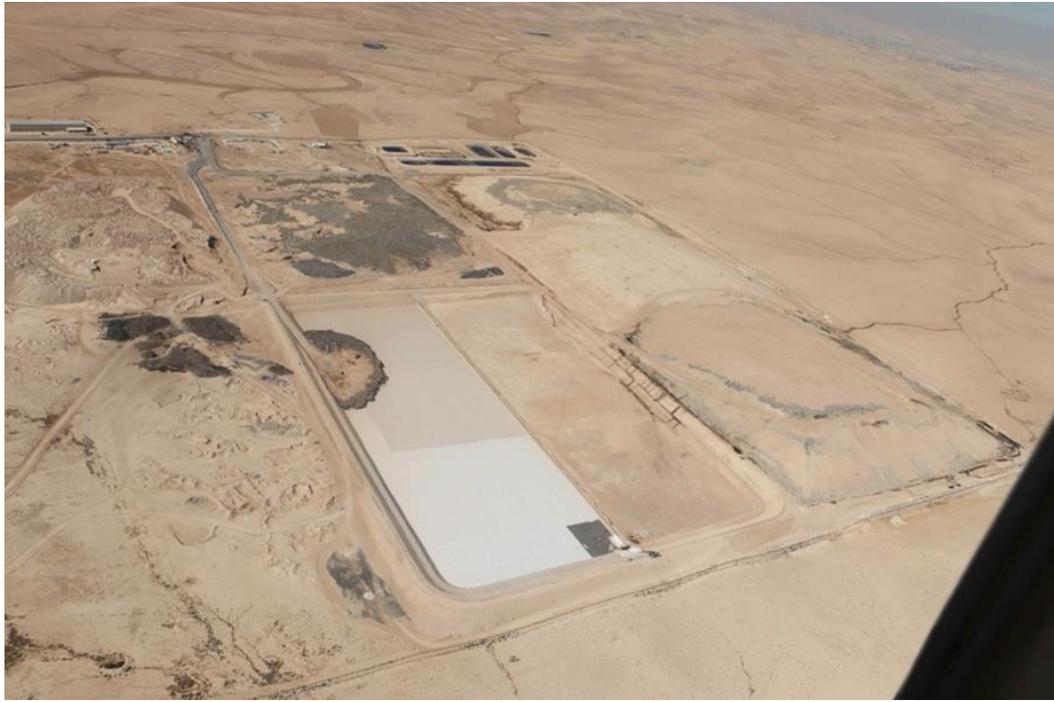
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<sup>1</sup>Given there is an Employee Relations Section within the Human Resource Department in GAM, engagement actions with employees and workers at the landfill are not included within the scope of the SEP. The Grievance Procedure for employees, workers and contractors is though summarised in Section 8.

There are some reportedly illegal factories in the area, with associated uncontrolled emissions and bad odours resulting from their activities.

Some waste pickers have identified to be accessing the site, unconfirmed estimates are around 30 to 50 in number. There are though no waste pickers currently living within or adjacent to the Ghabawi landfill. Entering of the landfill by waste pickers, is considered to be an activity in violation of the law.

An aerial image of the Ghabawi Landfill from October 2014 is shown below:



*(Source: GAM – Helictor Oct'2014)*

## **2.2 PROJECT DESCRIPTION**

The EBRD proposed loan to GAM will continue the main objectives of the WB Project. Circumstances changed between 2007 and 2015 (during the WB loan) as the Clean Development Mechanism (CDM) market changed and the date of the Kyoto Protocol expired. The main objective of continuing the works are to solve environmental problems caused by leaking leachate, reduce greenhouse gas emissions and reduce bad odours.

The Project is made up of the following components:

- Works to stabilise and cap Cells 1 and 3;
- Actions to manage leachate at Cells 1, 2 and 3. This will entail installation of leachate wells in Cells 1 and 3, installation of additional leachate piping, and possibly including a leachate recirculation system;
- Installation of LFG recovery system from Cells 1 and 3 and equipment to allow the flaring of LFG from this system; and
- Installation of gas engines, generators and a grid connection, leading to the generation and export of electricity to the Jordanian grid.

The works will be managed by GAM who will procure an experienced waste management contractor to undertake the works above for installation of the landfill gas recovery system and the gas engines to generate electricity. It is anticipated installation of the LFG recovery system for Cells 1 and 3 will be in place in order to allow capture and flaring of LFG in January 2016, with generation and export of power from Cells 1, 2 and 3 begin in January 2017. These timings are indicative.

The export of power is reliant on agreement with NEPCO<sup>2</sup> or JEPSCO<sup>3</sup> of the works required to establish a grid (i.e. transmission line) connection to the site, and the necessary permissions and permits to connect and export power. In case the total MWh is more than 5 MWh then a generation license from EMRC<sup>4</sup> is required too.

### 3 REGULATORY CONTEXT

#### 3.1 RELEVANT JORDANIAN STAKEHOLDER ENGAGEMENT REQUIREMENTS AND LEGISLATION

Stakeholder engagement in Jordan is connected to the preparation of an Environmental and Social Impact Assessment (ESIA)<sup>5</sup> and is a requirement of the “EIA Regulation No. (37) of 2005” – see Table 1 below. For those projects which require an ESIA, the Regulation requires a scoping session with potentially affected stakeholders at the onset of the ESIA, in order to provide stakeholders with project information and allow them to participate in the ESIA process.

The Ministry of Environment requires the following stakeholder groups to be invited to the scoping session: national government entities; local governmental agencies; non-governmental organisations; academic and research institutions; and local community representatives.

The Regulation specifies that the outcomes of the ESIA are to be announced to the public and stakeholders in a manner that the Ministry of Environment (MoEnv) deems appropriate and is dealt with on a case by case basis – taking into account the type and nature of the project development.

There is no national legal requirement on GAM to disclose information or consult with affected parties – other than statutory authorities and utilities – outside of the ESIA scoping process.

**Table 1: Key Legal Framework in Jordan Requiring Stakeholder Engagement**

Law	Summary of Stakeholder Engagement Requirements
Environmental Impact Assessment (EIA) Regulation (No. 37 of 2005)	This Regulation sets out the ESIA/EIA process in Jordan. Its annexes provide screening criteria, listing the types of projects which require a comprehensive EIA or a preliminary EIA study, and those for which neither is needed. For projects which require a comprehensive EIA, a public scoping session is required to set the Terms of Reference (ToR). The purpose of the scoping session with potentially affected stakeholders at the onset of the ESIA, is in order to provide stakeholders with project information and allow them to participate in the ESIA process. The Regulation specifies that the outcomes of the ESIA are to be announced to the public and stakeholders in a manner that the Ministry of Environment deems appropriate and is dealt with on a case by case basis – taking into account the type and nature of the project development.

#### 3.2 EBRD REQUIREMENTS

The Project has been screened as a Category B project under EBRD’s Environmental & Social Policy 2008 (<http://www.ebrd.com/downloads/research/policies/2008policy.pdf>) and has been assessed against the EBRD Performance Requirements (PRs) contained within the policy.

GAM are seeking a loan for financing for the Project from EBRD for the Project. The Project needs to meet the requirements for stakeholder engagement and public consultation as specified in the EBRD Environmental and Social Policy of 2008, its Public Information Policy and Performance Requirements (PRs). EBRD’s PR10 (Information Disclosure and Stakeholder Engagement) sets out the following requirements of stakeholder engagement during project preparation:

- identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (“affected parties”), or (ii) may have an interest in the project (“other interested parties”).
- identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders

<sup>2</sup> NEPCO: National Electric Power Company  
<sup>3</sup> JEPSCO: Jordanian Electric Power Company  
<sup>4</sup> EMRC: Electricity and Mining Regulatory Commission  
<sup>5</sup> ESIA’s are also referred to as Environmental Impact Assessment (EIA)

may be affected and the extent of the potential (actual or perceived) impacts. . Employees are generally considered stakeholders<sup>6</sup>.

- inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure envisaged.

This Stakeholder Engagement Plan has been developed, in accordance with PR 10 (Information Disclosure and Stakeholder Engagement) of the Policy.

#### 4 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT

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

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

As part of the WB Project, an ESIA was requested by the WB as well as the Ministry of Environment to cover the components in the Landfill covered by the WB loan agreement which included the power generation plant and sorting facility plant; and the relationship between the existing landfill and these facilities. In accordance with Jordanian legislative requirements, contained within the “EIA Regulation No. (37) of 2005”, and WB Operational Policies, stakeholder engagement activities were organised during the Project ESIA and these are summarised in the table below.

**Table 2: Summary of Previous Stakeholder Engagement Activities – Ghabawi Landfill**

Date	Engagement Activity	Summary of Stakeholder Engagement Activities:
5 February 2008	ESIA Scoping Session	<p>The various stakeholder groups were identified by the ESIA Team in coordination with the Ministry of Environment. The stakeholders were provided with a draft TOR/Scoping Report after which a scoping session was held in Amman. During the scoping session, the Project was introduced and various components explained. The proposed methodology for the ESIA was outlined and anticipated impacts throughout the Project’s phases were discussed. Stakeholders were invited to participate in the scoping of environmental impacts into the ESIA. The main issues raised by stakeholders related to:</p> <ul style="list-style-type: none"> <li>▪ Surface and groundwater quality;</li> <li>▪ Soil;</li> <li>▪ Ambient air quality;</li> <li>▪ Biodiversity; and</li> <li>▪ Public health.</li> </ul> <p>A Scoping Report was submitted to the Ministry of Environment after the session which included the main outcomes and deliberations from the Scoping Session.</p>
12 June 2008	ESIA Disclosure Session	<p>The Executive Summary of the Draft ESIA Report in Arabic was distributed to the various stakeholders invited to the Disclosure Session for their review. The various stakeholder groups were invited once again to a disclosure session held in Amman with the objective of presenting the main findings and recommendations included in the ESIA study for them to provide feedback. The key comments that were raised throughout the session are summarised below. Throughout the session, it was explained how those issues have been addressed throughout the ESIA study.</p> <ul style="list-style-type: none"> <li>▪ Public health and impacts on local communities; and</li> <li>▪ Groundwater quality.</li> </ul>
June 2008	Disclosure of ESIA Studies	<p>Copies of the full Final ESIA report were made available at the Ministry of the Environment, the World Bank website and the Greater Amman Municipality websites</p>

<sup>6</sup> See footnote <sup>1</sup>.

Date	Engagement Activity	Summary of Stakeholder Engagement Activities:
		for the general public.

## 5 IDENTIFICATION OF PROJECT STAKEHOLDERS

In order to define a communication process with the stakeholders, several groups that may be interested and/or affected by the project implementation have been identified. There are a number of groups of people and social groups who are interested in the Project on different levels. In particular for this Project, these may be identified as following:

- People, social groups and organisation who will be directly or indirectly affected by the project: This group mainly includes nearby local communities and other nearby receptors (farms, industrial establishments, etc); and
- People, social groups and organisations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group mainly includes governmental entities such as the Ministry of Environment (MoEnv), Ministry Labour (MoL), Ministry of Health (MoH), Ministry of Water and Irrigation (MWI)/Water Authority of Jordan (WAJ), National Electric Power Co. (NEPCO), Jordan Electric Power Co. (JEPCO) and Electricity and Mining Regulatory Commission (EMRC).

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified in the course of the Project development and as a result of cooperation of the parties.

**Table 3: Ghabawi Landfill Stakeholders**

Level of Stakeholder interest in/involvement to the Project
<b>Stakeholders who May be Directly or Indirectly Affected by the Project &amp; Ghabawi Landfill Operation</b>
Amman Asia Electric Power Company – <i>Ghabawi Power Station</i>
Nearby Agricultural Farms – <i>including tree plantations, poultry and cattle farms etc.</i>
Nearby Factories – <i>2 No. within 5 km</i>
Cattle Market
Nearby local community – from Uhod District mainly includes Maduneh village
Military Camp
Waste Pickers
<b>Possibility to Influence and Make Decisions on Implementation of the Project</b>
Ministry of Environment
Ministry of Labour
Ministry of Health
Ministry of Water and Irrigation/Water Authority of Jordan
Civil Defence Authority
National Electric Power Co. (NEPCO)/Jordan Electric Power Co. (JEPCO)/ Electricity and Mining Regulatory Commission (EMRC)

## 6 STAKEHOLDER ENGAGEMENT PROGRAMME AND ACTION PLAN

### 6.1 STAKEHOLDER ENGAGEMENT PROGRAMME

Given the lack of communities around the landfill, this SEP is based on:

- Establishing a stakeholder Liaison Committees<sup>7</sup> for Ghabawi landfill and using this to provide updates and keep local community informed on the Project and other related activities and plans at Ghabawi landfill, and on the grievance mechanism;

<sup>7</sup> This could utilise the Neighbourhood Committees in the Municipal District where the Ghabawi facility is located. Where the Neighbourhood Committees have not yet been established the GAM District Office would be used.

- Working with the Environmental Directorate – Department of Environmental Studies to raise public awareness on waste management;
- Holding bilateral discussions with statutory authorities and utilities, e.g. in relation to environmental monitoring (MoEnv), risks to water resources (WAJ), and electric power connection and generation (NEPCO/JEPCO, EMRC).

## 6.2 COMMUNICATION METHODS WITH STAKEHOLDERS

For each of the stakeholder group the specific communication methods and tools GAM will use have been identified. A description of the communication methods to be adopted by GAM for engagement is provided below.

GAM will use existing communication methods where relevant and have identified the additional specific measure of establishing a stakeholder Liaison Committee for the Ghabawi Landfill. The objective of employing various methods with each stakeholder group is in order to ensure easy, transparent, direct, open and interactive communication with all stakeholders and to get as earlier as possible their feedback in the different phases of project implementation.

### 6.2.1 Ghabawi Landfill Liaison Committee

GAM will establish a Liaison Committee with local stakeholders and communities for the Ghabawi Landfill. This committee will meet on a quarterly basis and will be facilitated by GAM Environmental Affairs Directorate with representatives from GAM Head Office, Site Manager (Landfill) and the Environmental Directorate – Department of Environmental Studies. The likely constituents of the Liaison Committees will be the stakeholder group who may be directly or indirectly affected by the operations, and are indicated below:

#### Ghabawi Landfill Liaison Committee:

- GAM representatives - GAM Environmental Directorate with representatives from GAM Head Quarters, Site Managers (Landfill) and the Environmental Directorate – Department of Environmental Studies. A GAM Liaison Officer who shall also manage the Grievance Procedure (see Section 8) will facilitate the Liaison Committee;
- GAM Representative of the Uhod District;
- Traditional and District representatives of the closest community & community members – Maduneh village;
- Operators of nearby facilities: Amman Asia Electric Power Company, Nearby Agricultural Farms – including tree plantations, poultry and cattle farms etc., Nearby Factories – 2 No. within 5 km and Cattle Market etc.;
- Representative of the Military Camp;
- Civil Defence Authority & Ghabawi Police Representatives;
- Ministry of Environment (*attendance requested by GAM as required*); and
- Representatives of Waste Pickers at Ghabawi<sup>8</sup> - the inclusion of waste pickers in the Liaison Committee will be reviewed following development of a Livelihood Restoration Framework (LRF) and further investigation of their presence. Alternative engagement methods may be established, this will include consideration of their potentially vulnerability.

The Liaison Committees will utilise as appropriate the District Neighbourhood Committee (see below).

### 6.2.2 District Neighbourhood Committees

In 2014, GAM started a project to establish Neighbourhood Committees in each of its 22 Districts, which aimed on broad terms to engage and cooperate with local communities in an effort to build and maintain a constructive relationship with them.

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<sup>8</sup> Engagement will be required with individual waste pickers whose livelihoods are dependent on waste picking at Ghabawi and have been identified to be accessing the site. A Livelihood Restoration Framework and Livelihood Restoration Plan (LRP) to provide for alternative livelihood options will be prepared. The LRP will determine the mechanism for engagement with waste pickers.

Generally, the Committee aims to serve the local community's needs and requirements and is based on voluntary work. Each committee has 7-9 members depending on the District's area and population, where members are selected and appointed by the District's Manager from GAM. Those mainly include members whom are socially active, elderly people, volunteers, representatives of the local community, etc.

Communication process and engagement with those stakeholders who may be directly or indirectly affected by the operations at the Landfill will utilise as far as possible the relevant Neighbourhood Committee in which the Landfill is located. However, at the time of preparing the SEP the Uhod Neighbourhood Committee where the landfill is located was not established – *GAM do have a District Office though which would be used in the absence of Neighbourhood Committee.*

However, due to the large area of the District in which the landfill is located, it is proposed that a separate Liaison Committee is established for the Landfill which includes representatives from nearby local community (Maduneh), nearby farms, industrial establishments, etc. Due to the community around the

GAM will though work with the Neighbourhood Committees for achieving communication with the wider Districts of the EBRD Project and will use these to:

- Provide updates and keep local community informed on any issues which could affect them – this will use the periodic meetings of the Committee for GAM to present basic information on the Project at the landfill and raise awareness of how any issues related to this and waste transportation to the landfill can be raised;
- Inform local community and other relevant stakeholders about grievance mechanism and procedures as detailed within this SEP, and receive any grievances and complaints from local communities in accordance with the grievance procedure discussed in Chapter 8; and
- Work closely with the Environmental Directorate – Department of Environmental Studies to raise public awareness on waste management (as discussed below).

### **6.2.3 Environmental Directorate – Department of Environmental Studies**

The Environmental Directorate of GAM which is responsible for Waste Management includes an Department of Environmental Studies<sup>9</sup>. The objective and mission of this Department is to raise public awareness, change behaviour, and promote interest in conservation of the environment in all its aspects – air quality, soil, water, energy, as well as solid waste management (recycling, reuse, segregation , etc.). Currently, this Department focuses on schools and university students through undertaking lectures, workshops, campaigns, etc.

Engagement with those stakeholders who may be directly or indirectly affected by the Project and the operations at the Ghabawi Landfill. This will include public awareness and educational programmes on waste management. This will build on the current programmes in relation to recycling, reuse, segregation, etc run by the department and be focused on raising public awareness of the current volumes of waste going to the landfill and the need why overtime recycling, reuse and segregation initiatives will become more important. The Environmental Services & Public Awareness Department will work with the Liaison Committee for the landfill and will also specifically run a road safety awareness programme focused on the Districts and communities along the route between the landfill and the East Amman transfer station.

The Department of Environmental Studies will also update the GAM website with updates on the Project.

### **6.2.4 Individual Meetings**

Individual meetings will be undertaken by representatives from GAM with several governmental entities – to include Ministry of Environment (MoEnv), Ministry of Water and Irrigation (MWI)/Water Authority of Jordan (WAJ), Ministry of Health (MoH), and Ministry of Labour (MoL), and National Electric Power Co. (NEPCO)/Jordan Electric Power Co. (JEPCO)/ Electricity and Mining Regulatory Commission (EMRC).

The objective of such meetings are mainly to review, agree, and implement the monitoring programmes related to Environment, Health, and Safety (EHS) within the landfill (to include air quality, noise, water resources, and occupational health and safety).

Generally, for the landfill the requirements for the monitoring programme was mainly established within the “ESIA for Municipal Solid Waste Management & Carbon Finance in Amman” which was approved by

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<sup>9</sup> Also referred to as the ‘Environmental Awareness Department’

the MoEnv in 2008, and subsequently defined within the World Bank Project. In addition, the monitoring programme for the landfill is part of the Environmental and Social Action Plan (ESAP) which EBRD will require GAM to implement.

In particular, additional engagement meetings will be undertaken by GAM for the landfill. This includes a meeting with the MoEnv as well as NEPCO/JEPCO/ EMRC both of which are discussed below:

- **Review of Permitting Requirements with MoEnv:** A meeting with the MoEnv will take place in order to review and agree on the ESIA and permitting requirements required for the electrical connection to the grid.
- **Application to Generate Electricity & Connection to Grid:** The landfill gas recovery Project at the landfill includes the construction of landfill gas to energy facility. GAM need to confirm this area is under the responsibility of Jordan Electric Power Co. (JEPCO). Hence, the GAM will need to coordinate with JEPCO, and submit an application for the generation of electricity and connection to the grid to JEPCO and for a generation license to the EMRC (if size of generation is more than 5MWh). Depending on the capacity in the JEPCO network GAM might have to connect to the closest NEPCO network in the area. In that case, GAM will need to coordinate with NEPCO too. This will require further investigation from GAM at the time of license application. GAM need to confirm with JEPCO/EMRC and MoEnv the ESIA and environmental permitting requirements for the connection to the grid. GAM will therefore undertake engagement meetings with NEPCO/JEPCO and EMRC.

### **6.2.5 Official Letters**

In accordance with the above, all outcomes agreed through the individual meetings will be properly documented through official letters issued from GAM to the various governmental entities and vice versa.

### **6.2.6 Disclosure of Documents & Information**

Documentation will be disclosed by GAM as outlined in Section 7, this will serve as one method of communication.

### 6.3 STAKEHOLDER ENGAGEMENT ACTION PLAN

Table 4 contain identified stakeholders, the engagement actions and communication methods for Ghabawi Landfill respectively.

**Table 4 Ghabawi Landfill Stakeholder Engagement Action Plan**

Stakeholders	GAM Stakeholder Engagement Actions	Timing	Communication Methods					
			Ghabawi Liaison Committee	Neighbourhood Committee/GAM District Office	Envi. Services & Public Awareness Dep.	Individual Meetings	Official Letters	Disclosure of Documents
All	Disclosure of Stakeholder Engagement Plan (SEP) on GAM website and deposit copies at site, GAM Head Office and Uhod District Office.	Feb/Mar'15	-	Yes	-	-	-	Yes
All	Disclosure of Non-Technical Summary (NTS) of Project on GAM website and deposit copies at site, GAM Head Office and Uhod District Office.	Feb/Mar'15	-	Yes	-	-	-	Yes
All	Prepare simple Grievance Procedure document and deposit copies at site, GAM Head Office and Uhod District Office.	June/July'15	Yes	Yes	-	-	-	Yes
All	Update Stakeholder Engagement Plan (SEP) and disclose.	Every 6 months/as req.	Yes	Yes	Yes	-	-	Yes
<b>Stakeholders who may be Directly or Indirectly Affected by the Project:</b>								
Nearby local community – from Uhod District mainly includes Maduneh village	Establish Ghabawi Landfill Liaison Committee and arrange meetings quarterly	Est. June/July'15 Quarterly Mtgs.	Yes	(Yes)	-	-	-	-
Amman Asia Electric Power Company – Power Station	Provide SEP & NTS to Liaison Committee.	June/July'15 (or at 1 <sup>st</sup> meeting)	Yes	(Yes)	-	-	-	Yes
Nearby Agricultural Farms – including tree plantations, poultry and cattle farms etc. Nearby Factories – 2 No. within 5 km Cattle Market	Provide regular updates on project activities of interest to stakeholder and which could affect them. Include in updates information on Emergency Response Plans.	June/July'15 (or at 1 <sup>st</sup> meeting) And then at Quarterly Mtgs.	Yes	(Yes)	Yes (via website updates)	-	-	Yes
Military Camp	Inform stakeholders about Grievance Procedure and distribute Grievance	June/July'15 (or	Yes	(Yes)	-	-	-	Yes

Stakeholders	GAM Stakeholder Engagement Actions	Timing	Communication Methods						
			Ghabawi Liaison Committee	Neighbourhood Committee/GAM District Office	Envi. Services & Public Awareness Dep.	Individual Meetings	Official Letters	Disclosure of Documents	
Waste Pickers <sup>10</sup>	Procedure document to Liaison Committee.	at 1 <sup>st</sup> meeting)							
<b>Possibility to Influence and Make Decisions on Implementation of the Project:</b>									
Ministry of Environment (MoEnv)	Review with the Ministry of Environment the ESIA and permitting requirements for the connection to the grid. (Also GAM will liaise with MoEnv on the wider landfill permitting).	Apr'15	-	-	-	Yes	Yes	-	
	Review and discuss Project environmental monitoring programme and Monitoring Plan with the Ministry of Environment (including air quality, dust, odour, groundwater, leachate etc.)	Apr'15 initial engagement - June/July'15	-	-	-	Yes	Yes	-	
Ministry of Water and Irrigation (MWI)/Water authority of Jordan (WAJ)	Review and discuss Project groundwater quality monitoring programme with MWI/WAJ, including the locating and installation of monitoring wells.	Apr'15 initial engagement - June/July'15	-	-	-	Yes	Yes	-	
	Liaise with WAJ and obtain updated information on wells in the vicinity of the landfill.	Apr'15/May'15	-	-	-	Yes	Yes	-	
Ministry of Health (MoH)	Review and discuss the implementation of an Occupational Health & Safety Plan, including worker medical surveillance and welfare facilities.	June/July'15	-	-	-	Yes	Yes	-	
Ministry of Labour (MoL)		June/July'15	-	-	-	Yes	Yes	-	
Civil Defence Authority	Review emergency response arrangements at Ghabawi with Civil Defence Authority (CDA). Review and discuss Emergency Response Plan with CDA and update annually.	June/July'15 (update)	-	-	-	Yes	Yes	-	

<sup>10</sup> The inclusion of waste pickers in the Liaison Committee will be reviewed following preparation of LRF & LRP. Alternative engagement methods may be established with waste pickers, this will include consideration of their potentially vulnerability.

Stakeholders	GAM Stakeholder Engagement Actions	Timing	Communication Methods					
			Ghabawi Liaison Committee	Neighbourhood Committee/GAM District Office	Envi. Services & Public Awareness Dep.	Individual Meetings	Official Letters	Disclosure of Documents
		annually)						
NEPCO/JEPCO EMRC	Coordinate with NEPCO & JEPCO to agree which company would handle the application and electrical connection for the Project. Review with NEPCO/JEPCO and EMRC the ESIA and environmental permitting requirements for connection to the grid. Coordinate with NEPCO/JEPCO, and submit an application for the generation of electricity and connection to the grid and for a generation license from EMRC.	During 2015	-	-	-	Yes	Yes	-

## 7 DISCLOSURE OF PROJECT DOCUMENTATION

GAM intends to provide all relevant information to stakeholders on the Project at Ghabawi Landfill and the related operations of the landfill. Certain documents and information will be disclosed to relevant stakeholders, as indicated in Tables 5 above. This includes: (i) regular updates on project activities (including on GAM website) and (ii) disclosure of the NTS & SEP.

### (i) Updates on Project Activities

GAM will coordinate and work with the Liaison Committees (and the relevant Neighbourhood Committees) to provide updates and keep local community and stakeholders informed on any issue which could affect them related to the Project and related activities at the landfill. This is to be undertaken through the following:

- Leaflets/information in Arabic to be distributed to Liaison Committee (and Uhod District Committee); and
- Project updates will also be made on the GAM Announcement Website: [http://www.ammancity.gov.jo/en/resource/news\\_archives.asp](http://www.ammancity.gov.jo/en/resource/news_archives.asp)

### (ii) Disclosure of the Project Documentation

All interested and affected parties will be able to find the following documents regarding the Ghabawi Landfill LFG Recovery & Power Generation Project the subject of EBRD's loan on the GAM website (<http://www.ammancity.gov.jo>):

- Non-Technical Summary (NTS) – February 2015
- Stakeholder Engagement Plan (SEP) – February 2015

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

#### **GAM Head Office:**

Environmental Directorate – Department of Environmental Studies

Greater Amman Municipality

Omar Matar St., Rass Alain

P.O. Box 132, Amman 11118

Telephone: 00962 (0)6 463 6111

Fax: 00962 (0)6 464 9420

#### **Uhod District Office:**

Khashfeh Al-Dabaybeh Neighborhood, Next to the Health Center

Tel: 00962 6 4023594

Fax: 00962 6 4023480

Stakeholders, including the public, will be able to use the grievance procedure and information on this procedure will be disseminated. The Grievance Procedure will also be available on the GAM website.

EBRD will disclose a Project Summary Document on their website ([www.ebrd.com](http://www.ebrd.com)).

## 8 GRIEVANCE PROCEDURE

Management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders. Monitoring of grievances can signal any recurrent issues, or escalating conflicts and disputes.

The previous grievance procedure for any comments or complaints raised by the local community was managed through direct contact through telephone with the Landfill Manager or via other routes in GAM (e.g. via the District representatives or the City Manager). The Manager in turn was responsible for resolving the issue directly. There are no records for any grievances submitted and how they were dealt with.

It is evident that the current procedure lacks a structured or systemic approach to managing grievances which also does not ensure that all affected stakeholders have access to such a procedure. Discussed below is the approach GAM will implement for grievance management going forwards.

### 8.1 STAKEHOLDER ENGAGEMENT GRIEVANCE PROCEDURE

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

The Grievance Procedure will be implemented by a GAM Liaison Officer to be assigned by GAM whom will be responsible for facilitating the Liaison Committee, handling all grievances received from the community during the lifetime of the Project for the landfill, but GAM will also accept complaints and issues associated with the collection and transportation activities undertaken.

Primarily, all grievances will be received through GAM's dedicated landline and e-mail address for complaints as specified below.

- GAM Complaints Direct Line: 00962 (0)6 4633812
- GAM Complaints E-mail Address: shakawi.dwn@ammancity.gov.jo

Complaints and issues can also be raised through District representatives, the Liaison Committee and the District Neighbourhood Offices.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. All grievances will be registered and acknowledged within 5 days and responded to within 30 working days. Individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Jordan.

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

The grievance procedure will be managed by a Liaison Officer and will be gender sensitive if required (i.e. a male and female liaison officer will be made available for managing complaints).

GAM will ensure that there is an independent, objective appeal mechanism and shall inform the affected communities about the grievance process in the course of its community engagement activities and specifically via the Ghabawi Landfill Liaison Committee, protecting the privacy of individuals.

The grievance process will follow the following key steps:

- Lodging a grievance: Stakeholders willing to lodge a grievance will be able to do so at GAM's dedicated complaints line and e-mail address.
- All grievances will be forwarded to the Liaison Officer whom will record all grievances on the Grievance Form and then collected in Grievance Record/Log which will be held at the GAM's office.
- Grievance procedure starts with formal acknowledgment by the Liaison Officer through a personal meeting, phone call, or letter as appropriate, within 5 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

- Based on notification from the Liaison Officer, a response to the complainant will be developed by the relevant individual from GAM (e.g. Landfill Manager, etc.) based on the required actions to be implemented to deal with the issue. Completion of these is recorded on the grievance record.
- The response to the complainant is signed-off by the Head of the Environmental Affairs Directorate. This sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance.
- The response to the complainant is recorded to help assess whether the grievance is closed or whether further action is needed.

## **8.2 SUMMARY OF WORKER GRIEVANCE PROCEDURE**

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

A workers' grievance procedure is established for the employees of GAM at the landfill and their contractors as a separate system. The grievance procedure should guarantee confidentiality. Workers are given the possibility to lodge grievances through the following:

- Direct Manager of the employee;
- Employee Relation Section of Human Resources Department at GAM; or
- Public Services Union Representatives.

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

Anonymous lodging can also be made possible (via grievance boxes – one of which should be available on site at the landfill). The Grievance Procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available. In particular all workers will be informed of the Grievance process and new workers will be informed when they join the Project. Information on Contact Points will be posted on staff information boards and on site information boards. GAM undertake to ensure this is in place by Apr'15.

## **9 RESPONSIBILITIES & REPORTING**

GAM will produce Annual Environmental & Social Reports, which will include a summary of the Project's performance in relation to the management and monitoring of environmental, health & safety and social issues. This will be posted on the GAM website.

The Environmental Affairs Directorate will be responsible for the implementation, monitoring and updating of the SEP. Senior Management authority for the SEP actions will be with the Deputy City Manager for the Districts and Environmental Affairs. GAM Senior Management will be responsible for ensuring the following pre-requisites are in place to implement the SEP:

- Sufficient and suitable capacity development programme for GAM employees implementing the SEP;
- Suitable and proper matching of technical background and capacity of GAM employees to the scope of the SEP;
- Stability of selected team in their positions in order to maintain the memory of the Project and SEP implementation, as well as the experience; and
- Implement a system for incentives to ensure successful implementation of the EBRD Project and SEP.

GAM Senior Management will undertake quarterly reviews of the SEP implementation to ensure that the Environmental Affairs Directorate is implementing the SEP obligations (e.g. checking responses and logging of complaints and grievances etc.).

Contact details for the GAM Environmental Directorate who are responsible for the SEP are provided below:

**GAM Head Office:**

Environmental Directorate

Greater Amman Municipality

Omar Matar St., Rass Alain

P.O. Box 132, Amman 11118

Telephone: 00962 (0)6 463 6111

Fax: 00962 (0)6 464 9420