

GREATER AMMAN MUNICIPALITY (GAM) SOLID WASTE ENVIRONMENTAL & SOCIAL DUE-DILIGENCE: NON-TECHNICAL SUMMARY

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GREATER AMMAN MUNICIPALITY (GAM) SOLID WASTE NON-TECHNICAL SUMMARY

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ABBREVIATIONS & ACRONYMS

Aol	Area of Influence
DBO	Design-Build-Operate
EBRD	European Bank for Reconstruction and Development
EHSS	Environmental, Health, Safety & Social
EIA	Environmental Impact Assessment
E&S	Environmental & Social
ESAP	Environmental & Social Action Plan
ESDD	Environmental & Social Due-Diligence
ESIA	Environmental & Social Impact Assessment
ESMP	Environmental & Social Management Plan
ESP	Environmental and Social Policy
EU	European Union
GAM	Greater Amman Municipality
GHG	Greenhouse Gases
HR	Human Resources
H&S	Health & Safety
ILO	International Labour Organisation
JEPCO	Jordanian Electric Power Company
JOD	Jordanian Dinar
LFG	Landfill Gas
NEPCO	National Electric Power Company
NGO	Non-Government Organisation
NTS	Non-Technical Summary
OHS	Occupational Health & Safety
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
WAJ	Water Authority of Jordan
WB	World Bank

1 INTRODUCTION

The Ghabawi solid waste landfill facility is approximately 40 km from Amman in the Eastern Desert. It was established in 2003 and is operated by the Greater Amman Municipality (GAM). GAM are looking to develop a Landfill Gas (LFG) recovery system for 3 cells and facilities to generate power at the landfill.

The World Bank was initially providing finance to GAM in connection to the Ghabawi landfill, including the installation of a Landfill Gas (LFG) recovery system and power generation. The LFG gas recovery system has been implemented for one of the three cells to-date from the WB loan. The European Bank for Reconstruction and Development (EBRD) is now considering providing a sovereign guaranteed loan to GAM to finance the completion of the landfill gas recovery system and power generation facility at Ghabawi landfill (the 'Project').

This document provides a summary, in non-technical language, of the Landfill Gas Recovery & Power Generation Project. It also presents the findings of an environmental and social assessment of the Project undertaken as part of EBRD's due-diligence process for the loan.

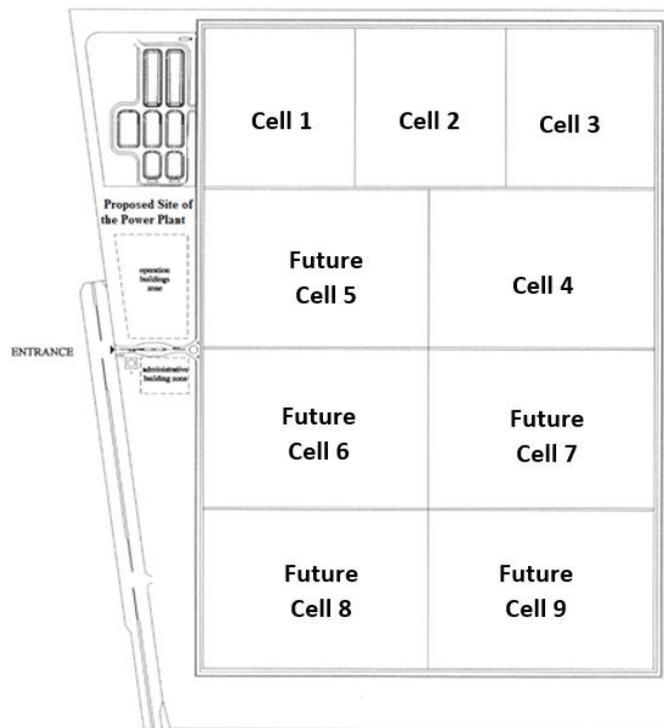
The Project preparation documents, including this Non-Technical Summary (NTS) and Stakeholder Engagement Plan (SEP), are disclosed on the GAM website (<http://www.ammancity.gov.jo>). Copies of these documents are also available at the GAM Head Office in Amman and the GAM District Office in Uhod District (see Section 9).

2 GHABAWI LANDFILL & PROJECT DESCRIPTION

2.1 GHABAWI LANDFILL

The Ghabawi landfill was designed and constructed between 2001 and early 2003. The landfill was developed to include nine excavations (which are called "Cells"). The planned layout is shown below in Figure 1. The Ghabawi landfill started receiving waste into Cell 1 in 2003 and Cells 1, 2 and 3 have now been filled and covered and are now closed to further waste dumping. Cell 4 is under construction, but the southern part of the cell is open to receiving waste.

Figure 1 Ghabawi Landfill Site Layout



(Source: Adapted from Figure in DBO Contract Annex B Appendix 4 Site Appendix – site maps)

When waste is taken to a landfill and is covered with other waste, the organic matter (such as food) in the landfill will start to decompose. This can cause two things:

- When mixed with liquids, such as water from rain, some of the decomposing waste will be combine with the liquid and form “leachate”. The leachate will start to drain out of the landfill and this can pollute soils and groundwater and this needs to be monitored and managed.
- The decomposing waste will also form landfill gas, which is a complex mix of different gases created by decomposing waste within a landfill and includes greenhouse gases (GHG), such as methane.
- Some of the gases produced are flammable (such as methane) and can cause fires and explosions. The build-up of landfill gases needs to be managed and controlled.
- The landfill gas can be collected and can then either be burnt off safely (flaring), sold as natural gas or can be turned into electricity in a landfill gas power generation facility. The flaring of landfill gas and using it to generate power provides revenue and reduces the greenhouse gases released to the atmosphere.

2.2 PROJECT DESCRIPTION

At the Ghabawi solid waste landfill facility, GAM has identified the need to improve the management of the landfill gas so that greenhouse gas emissions are reduced so the landfill is safe and the environment is protected. The Project will help deliver these improvements. The Project will also mean that electricity can be generated, which is a by-product of the waste treatment. This provides a good opportunity for the landfill to become sustainable and will be expanded to produce energy from the planned Cells in the future.

GAM will contract much of this work out (in a design, build and operate contract) and it is expected that there will be other contracts for technical and contractual supervision. The design details of the Project will be finalised by the selected contractor, to specifications provided by GAM.

The Project will include the following components:

- Stabilising the structure and shape of Cells 1 and 3.
- Managing the leachate at Cells 1, 2 and 3. This will involve digging wells and installing pipes and a system which will drain the leachate from the Cells.
- Developing a landfill gas recovery system from Cells 1 and 3, which will extract gas and transport it to a flare (where it can be burnt safely).
- Installing gas engines, generators and a grid connection so that the landfill gas can be turned into electricity at the power generation facility and exported to the Jordanian distribution grid.
- Connection of the generators to the Jordanian electrical distribution grid.

As there is no physical separation at the Ghabawi landfill between the GAM operations and the Project activities, the overall health and safety of workers, waste pickers and others working at the landfill have also been assessed as part of the Project planning.

2.3 GAM ASSOCIATED OPERATIONS & FACILITIES

The Ghabawi landfill will remain in operation by GAM during the implementation of the landfill gas recovery system and power generation Project. The areas of the landfill where the works for the Project will be constructed are in Cells 1, 2 and 3, the ponds which collect the leachate from the Cells and the location of the power generation equipment and connection to the grid. This is considered to form the ‘Project Area’.

GAM will continue to operate the remaining area of the landfill, including disposing of waste into Cell 4, during the implementation of the Project. Waste is transported to Ghabawi mainly from the East Amman Transfer Station, which GAM also operate. Whilst the whole landfill operation outside the Project Area, the transport of waste to the landfill and the transfer station do not form part of the Project the key environmental, health, safety and social (EHSS) risks have been identified during the assessment.

Measures to manage the key EHSS risks of these associated GAM operations and facilities have been identified and have been included in an Environmental & Social Action Plan (ESAP), see Section 8 below.

3 PURPOSE OF PROJECT AND ALTERNATIVES

3.1 PURPOSE OF THE PROJECT

The project will result in the generation of electricity and is expected to provide significant environmental improvements, including:

- A reduction of greenhouse gas emissions from Cells 1, 2 and 3 (estimated at 1,909,713 tonnes of CO₂ equivalent).
- Stopping pollution from the leachate from Cells 1, 2 and 3.
- Improvements in the treatment of leachate.
- A general improvement in environmental and health and safety management of the landfill.

3.2 CONSIDERATION OF ALTERNATIVES AND PROJECT SELECTION

In developing the proposed Project, the environmental and social implications of several alternatives were considered, and are summarised in Table 1 below.

Table 1: Summary of Project Key Alternatives

Description of Alternative	E&S Implications
<p>No Project: GAM acts to stabilise Cells 1 and 3, but no adequate leachate control is installed, and no landfill gas collection is established at Cells 1 and 3. Landfill gas from Cells 1-3 is vented to the atmosphere. No generators are installed and no power is generated.</p>	<ul style="list-style-type: none"> ■ The greenhouse has emission reduction is not achieved. ■ Leachate will continue leaking and contaminating the ground. This will also be a risk to groundwater. ■ GAM continues to manage the rest of the landfill in a manner which falls significantly short of good practice, with consequent risks to the health and safety of workers, waste pickers, and the public.
<p>Project is extended in the future to include Cell 4: Leachate management and a landfill gas extraction system in Cell 4 is included in addition to the proposed Project. This will increase landfill gas levels and extend the lifetime of the gas power generation phase.</p>	<ul style="list-style-type: none"> ■ In addition to the advantages of the Project, landfill gas is recovered from Cell 4, increasing the greenhouse gas reductions, and the amount of power generated. ■ It is strategic for GAM to first develop the management of leachate and landfill gas in cells 1, 2 and 3 before applying these overall waste management performance improvements to the remainder of the facility.

There are currently no other known project alternatives being considered by GAM. The Project is essentially the next steps of an existing project that has already started and therefore, there are no realistic alternatives to the location or to the overall Project aims and objectives. The possible extension of the Project to include Cell 4 is an option which GAM may consider, in the future, but it does not alter implementation of the proposed Project.

4 SUMMARY OF ENVIRONMENTAL AND SOCIAL LEGAL POLICY FRAMEWORK

4.1 SUMMARY OF ESIA AND PERMITTING PROCESS

Jordan has a reasonably well developed Environmental and Social Impact Assessment (ESIA) process. This is governed by the *EIA Regulation (No. 37, 2005)*, which sets out the ESIA process in Jordan¹. For a project such as Ghabawi landfill, the project and environmental baseline are to be described, impacts to be assessed, and mitigation measures and a monitoring plan are developed.

Jordan has recently adopted the Instructions for Site Selection of Development Projects of 2012 to guide the screening stage of the environmental permitting process. This Instruction identifies requirements on the siting of development Projects and identifies minimum distances that must be respected in relation to nearby sensitive receptors.

Construction and operation of Ghabawi landfill pre-dated both of these pieces of legislation, although it was subject to a detailed site selection process. In 2008, a full ESIA was carried out as part of the conditions of a World Bank loan. This ESIA was approved by the Jordanian Ministry of Environment, and an environmental permit was granted.

This proposed Project is covered by the original environmental permit.

The 2008 ESIA did not cover fully the connection to grid and GAM will discuss the environmental permitting requirements for the connection with the Ministry of Environment and prepare an ESIA, if required. Given the connection will be in the Eastern Desert area with very limited receptors around the landfill, no significant EHSS issues are anticipated with the connection to grid.

4.2 NATIONAL LEGAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL PROTECTION

Waste Management

There are several regulations and standards which govern environmental pollution and management, and waste management in Jordan. These include:

- Regulation for the Management of Solid Waste (27, 2005).
- Instruction for Transport and Treatment of Waste for the Year 2014.
- Health Nuisances Prevention within Boundaries of GAM Regulation No. 83 of 2009.

The Jordanian legislation falls short of the requirements of the key European Union legal framework (eg EU Waste Framework Directive, Landfill Directive & Industrial Emissions Directive).

Labour Management

Jordan is a member of the International Labour Organisation (ILO) and its legislation on labour issues broadly complies with international practice. GAM employees and workers are covered by the Civil Services Statute and related regulations.

Protection of Public Health

Legislation on public health includes:

- The Public Health Law No. 47 of 2008.
- Protecting the Environment in Emergency Situations Regulation (No 26, 2005).

4.3 SUMMARY OF EBRD REQUIREMENTS & EU STANDARDS

As a condition of an EBRD loan, the Project must comply with EBRD's Environmental and Social Policy¹ which is committed to promoting European Union (EU) environmental standards. These are reflected in its Performance Requirements which will apply to the Project only and will not apply to the associated operations and facilities at the Ghabawi landfill and East Amman Transfer Station.

¹ Although Jordan refers to "Environmental Impact Assessment" ("EIA"), in order to be consistent within the ESDD Report and this NTS, "ESIA" and "EIA" can be seen as interchangeable.

4.4 PUBLIC DISCLOSURE AND CONSULTATION REQUIREMENTS

There are limited legal requirements on stakeholder engagement in Jordan other than as part of the scoping process of an ESIA, as outlined in the EIA Regulation. However, the 2008 ESIA for the original Project was undertaken following World Bank standards which are considered to be comparable to EU requirements and EBRD standards.

A Stakeholder Engagement Plan has been developed as part of the Project, which will:

- 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. GAM will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts.
- describe how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure envisaged.

5 SUMMARY OF BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS

Current Conditions at the Landfill

The Project ‘baseline’ can be described as the current environmental and social situation at the Ghabawi landfill.

Waste Cells 1, 2 and 3 are full and have been closed to any more waste. An aerial photograph of the landfill taken in October 2014 is shown in Figure 2 below for context.

Figure 2 Aerial Photograph of Ghabawi Landfill (Oct’14)



Cell 1 was over-filled beyond its capacity which has made it structurally unsafe. It needs to be stabilised before applying proper cover and capping. There is no effective leachate management, and leachate is leaking from the cell into the surrounding ground, which is not protected by any kind of lining. There is no landfill gas recovery system, and landfill gas is escaping naturally to the air.

Cell 2 has been covered and capped, and a landfill gas recovery system has been installed. The landfill gas system leads to a controlled flaring facility.

Cell 3 has been covered partially, but not capped. It was also filled beyond its design capacity and has been subject to stability issues. There is leachate draining from the Cell, but this is not well managed and the leachate is leaking slowly to the soil. There is no landfill gas recovery system.

Leachate Management System: GAM has established a series of ponds to collect the leachate to the west of Cell 1. Some leachate has been put in these ponds in the past, but this appears to be transported by truck, rather than via a pipe network (which is preferable). There is also a leachate recirculation system in Cell 2, but this is not currently being used.

Fresh waste is currently being deposited in **Cell 4**. GAM workers and some waste pickers are operating at the dumping face, along with vehicles and trucks. Health and Safety management here needs improvement. There is evidence of the regular cover of waste. Half of the Cell (where waste is being deposited) has been dug out and lined, while the other half of the Cell is still being lined with a geotextile, and a gravel cover. The lining will contain any polluting materials and stop any contamination of the ground.

Other Areas. GAM has stockpiled waste on unlined ground at the areas designated for the future Cells 5 and 6. This is causing leachate to run into ground in the area, and the uncovered waste is attracting birds, flies and vermin.

Surface Water and Groundwater at the Landfill

There is no natural surface water in the Ghabawi area, apart from temporary flood channels which appear during rainfall. There is groundwater below the Ghabawi site, however it is very deep and the risk of groundwater contamination is considered to be low assuming good management of leachate.

There is one well on the Ghabawi site, from which water is pumped regularly (every 2 – 3 days) for dust control and truck washing, but not for drinking. There are no other known wells close to the site. There are other wells approximately 2 km to the south and south west of the landfill boundary, which are situated on farms and are likely used for agricultural irrigation.

To date, no monitoring of groundwater quality has been carried out so there is no information on any current impacts and future risks to soil and groundwater as a result of the past and present landfill operation.

Other Environmental Aspects

The area is semi-flat with a gentle slope towards the north-west. Because of the flat landscape, the site cannot be seen clearly from the approach road or adjacent lands. The surface is a soft, thick bedded chalky marl and chalky limestone, which acts as an impermeable barrier to water flow. The area is seismically active. The Project Area lies in an area of very low diversity of plant species. No species of flora and fauna or habitats of particular conservation or endemic significance were recorded in the ESIA.

Social Context

The Ghabawi landfill is in an unpopulated largely desert area, with a few farms in the area. 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 has been recently established approximately 1.5 km to the south of the landfill.

Waste pickers are operating informally on the landfill site and their access is considered by GAM to be a violation of the law. A short study of waste pickers by EBRD was undertaken during February 2015. Waste pickers were seen to be operating within Cell 4 at and near the dump face. They were seen accessing the site through the boundary fence which is broken in places.

It is estimated there are approximately 30 to 50 waste pickers per 24 hour period currently operating at Ghabawi landfill. The ESIA reported some waste picking activity in 2008 and other publically available documents note their presence in 2010. Numbers of waste pickers are understood to have increased in the period 2010 to 2012, with information inferring numbers were around 200 per 24 hour period. GAM have implemented measures previously to try and limit and prevent waste picking activities at the landfill, therefore currently figures are estimated to be significantly less than those experienced in 2010-12.

No waste pickers are currently living within or adjacent to the Ghabawi landfill, and the pickers are not part of any community local to the area. The individual waste pickers accessing the site are considered to be potentially dependent on waste picking at Ghabawi.

6 ENVIRONMENTAL BENEFITS, ADVERSE IMPACTS AND MITIGATION MEASURES

The Project is expected to produce environmental improvements, these are explained in Section 3.1.

Adverse Environmental Risks and Impacts

No significant environmental risks should arise from the Project if it is well managed. However, GAM's other operations at the landfill facility, including dumping waste in Cell 4, management of leachate, excavation works for future cells, etc. all carry environmental risks. Actions and measures to manage the EHSS risks associated with the Project and the landfill will be managed as part of an Environmental and Social Action Plan (ESAP), a summary of which is provided in Section 118. Environmental risks include:

- odour;
- leachate infiltration;
- dust emissions from the handling of waste, e.g. dumping on unlined ground;
- misapplication of daily cover; and
- insufficient management of leachate.

Other Environmental Impacts

No additional adverse impacts on air quality, biodiversity, the landscape and visual amenity of the area, traffic, noise and vibration, raw material outsourcing and transportation or road safety, will arise as a result of the Project.

7 SOCIAL BENEFITS, ADVERSE IMPACTS AND MITIGATION MEASURES

Health and Safety Risks and Impacts

The main health and safety risks arising from the Project are:

- There is an explosion risk associated with the release and collection of landfill gas. The management of explosion risk will be improved by the Project should the provisions within the ESAP be implemented.
- There is a risk of exposure to hazardous substances – including landfill gas - from working with waste and leachate. Those working on the site without adequate personal protective equipment and welfare facilities (during the visit, this was observed to include GAM workers as well as waste pickers) are at particular risk.
- The associated operations, ie GAM's operation of the rest of the landfill, have significant health and safety risks, given the lack of awareness, training, facilities and management controls. These risks include collision risk on the landfill and at the dumping face due to inadequate control of personnel.

Public and Community Risks and Impacts

No risks to the public and communities should arise from the Project. The management of leachate to stop ground contamination around the site should be reduced as a result of the Project.

GAM's operation of the rest of the landfill site has some public health risks. These include:

- risk to the families of workers from the carrying hazardous materials on their persons and clothing due to the lack of changing and washing facilities at the landfill; and
- there is a low degree of risk of infectious diseases from vermin, dogs and other vectors (mosquitoes) attracted by the exposed stockpiles of waste on the site, and leachate ponding.

Land Acquisition and Resettlement

Ghabawi landfill was established on military lands, which were unused and undeveloped and there were no communities in the Project Area. No resettlement of economic displacement was involved. No additional land is needed for the Project, as all project facilities lie on the landfill site.

There are waste pickers operating on the landfill facility whose livelihoods are considered to be potentially dependent on their waste picking activities at Ghabawi. There is potential for economic displacement to occur if they are restricted from accessing the site, and lose their means of livelihood as a result. Therefore as EBRD's Performance Requirement No 5 is triggered a Livelihood Restoration Framework (LRF) and Livelihood Restoration Plan (LRP) to identify alternative livelihood options for waste pickers will be prepared and implemented.

Cultural Heritage

Cultural heritage was addressed during the 2008 ESIA, which records that a suitability survey was carried out in 2002, and that no cultural or archaeological heritage resources were found in the Project Area.

No additional excavations will be required for the Project, at Ghabawi landfill, so no impacts on cultural heritage are anticipated. However, GAM will be encouraged to establish a Chance Finds Procedure to cover additional development of the landfill, specifically excavation for future cells.

8 ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING

An Environmental and Social Action Plan (ESAP) has been developed which sets out actions to address the various environmental and social risks described in Sections 6 and 7 above, and timelines to achieve these actions. These actions are applicable to the Project Area, and also identify measures to manage risks at the entire Ghabawi landfill facility. The key actions and measures are summarised below:

Table 2 Key Environmental & Social Actions & Measures

Key Environmental & Social Actions & Measures:	Timeline
Improve environmental, health, safety and social management on Ghabawi landfill by restructuring GAM to establish a single authority for onsite management with oversight and responsibility of the whole landfill site. Senior management and advisors will be regularly based at the landfill who are experienced in landfill EHSS management will work with GAM to implement an environmental, health, safety and security management system, with clear responsibility for risk management.	Commence immediately. Improved structure within 3 months.
Reduce health and safety risks to workers, their families and communities by installing welfare facilities at the landfill (washing facility/changing room, toilet, first aid point, staff canteen/facility for refreshments and staff breaks) and introduce basic safety procedures (security, first aid, traffic training, emergency plan, personal protective equipment). Implement industrial hygiene procedures. GAM do conduct regular medical checks for workers and all GAM workers at the landfill have medical insurance as they are government employees. Implement more stringent security and access controls.	Commence immediately.
Establish key environmental baseline conditions by starting environmental monitoring at the landfill using the monitoring recommendations from the 2008 ESIA and recent EBRD assessment. Prepare an Environmental Monitoring Plan which will include the national and international parameters and limit values from Jordanian and EU legislation for air quality, groundwater, leachate, landfill gas, soil gas monitoring.	Commence immediately.
Reduce the amount of leachate leaking into the ground by moving the leachate from Cell 3 into the leachate ponds or into Cell 4 (under the advice of an experienced landfill consultant).	Commence immediately.
Improve safety of Cells 1 and 3 by investigating their instability and then based on technical advice, take action to stabilise the Cells.	Commence immediately.
Be aware of future risks and the permitting process to allow realistic forward planning of the Project by reviewing the ESIA with the Ministry of Environment; and environmental permitting requirements for connection to the grid with the Ministry of Environment, NEPCO, JEPSCO and EMRC.	Review undertaken by April 2015.
Develop and implement an Environmental and Social Management Plan (ESMP) at the Project Area of the landfill which will include implementing the measures agreed previously with the Ministry of Environment in the 2008 ESIA such as managing landfill gas and leachate to avoid pollution and contamination. It will include the Environmental Monitoring Plan (EMP). These requirements of these plans will be included in full in the Contractor requirements.	EMP by April 2015. ESMP within 2 months of Project investment.
Monitor the environmental and social performance of the Contractor and GAM by engaging an independent consultant/engineer for any Contract placed for the	In parallel with Contract award.

implementation of the Project and GAM's related environmental and social management of the whole Ghabawi landfill	
Improve awareness and management of health and safety risks onsite by raising awareness of OHS procedures; providing and training workers in the use of personal protective equipment such as gloves and protective overalls; installing health and safety signage, including marking routes through the facility for drivers; implement a health and safety plan including risk assessments and method statements and provide staff training.	Within 3 months of Project investment.
Improve Emergency Response workforce awareness and responsibilities by preparing an Emergency Response Plan, installing the necessary facilities and provide the necessary training.	Within 3 months of Project investment.
Reduce risk of explosion by undertaking an explosion risk review by an experienced landfill expert and implement system in line with international good practice. Implement smoking controls onsite.	Commence Immediately
Remove waste pickers. Develop and implement a Livelihood Restoration Framework (LRF) and Livelihood Restoration Plan (LRP) which provide alternative livelihood assistance options.	Commence immediately.
Disclose Project information to stakeholders and affected parties and engage with them on their concerns by implementing a Stakeholder Engagement.	Implement Stakeholder Engagement Plan within 3 months of Project investment.

EBRD will conduct ongoing monitoring, including site visits, as and when deemed necessary, and will establish an ongoing working relationship with GAM, to encourage improvements in its EHSS management at the landfill.

9 STAKEHOLDER ENGAGEMENT

A Stakeholder Engagement Plan has been developed for the Project and the landfill. The main elements of the Stakeholder Engagement Plan are:

- Establishing a stakeholder Liaison Committees for Ghabawi landfill, and using these to provide updates and keep local community informed on activities and plans at Ghabawi landfill, and on the grievance mechanism;
- Working with GAM's Environmental Services & Public Awareness Department to raise public awareness on waste management; and
- Holding bilateral discussions with statutory authorities and utilities, eg in relation to environmental monitoring (Ministry of Environment), risks to water resources (WAJ), and electric power connection and generation (NEPCO/JEPCO, EMRC).

All interested and affected parties will be able to find the following documents regarding the Ghabawi Landfill Gas 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 Stakeholder Engagement Plan will be updated periodically. Hard copies of these documents will be deposited at the GAM Head Office and the District Office in Uhod District at the address shown below:

GAM Head Office:

Environmental Services & Public Awareness Department
 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

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

Grievances can also be received by GAM at their Head Office or via the District Offices/representatives.

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.

GAM will produce Annual Environmental & Social Reports for the Bank, which will include a summary of the Project's performance in relation to the management and monitoring of environmental, health & safety and social issues and a clear update on progress of implementation of ESAP actions. Any relevant updates will also be posted on the GAM website.

The Environmental Affairs Directorate will be responsible for the implementation, monitoring and updating of the Stakeholder Engagement Plan. GAM Senior Management will undertake quarterly reviews of the Stakeholder Engagement Plan implementation to ensure that the Environmental Affairs Directorate is implementing the Stakeholder Engagement Plan obligations (e.g. checking responses and logging of complaints and grievances).

EBRD will disclose on their website a Project Summary Document (PSD) (www.ebrd.com).

10 CONTACT DETAILS

Contact details for Project are the GAM Environmental Affairs Directorate who are responsible for the communication with the public are as follows:

GAM Head Office:

Environmental Affairs Directorate

Greater Amman Municipality

Omar Matar St., Rass Alain

P.O. Box 132, Amman 11118

Telephone: 00962 (0)6 463 6111

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