



West Irbid Wastewater Project

Stakeholder Engagement Plan

13 March 2018

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1 Introduction

The Hashemite Kingdom of Jordan (“GoJ”), via the Water Authority of Jordan (WAJ) is proposing the upgrade and construction of a wastewater infrastructure system in West Irbid. The West Irbid Wastewater Network Project (the Project) is seeking international financing from European Bank for Reconstruction and Development (EBRD) and will therefore be completed in line with the requirements, including environmental and social requirements, of the EBRD.

The Project involves upgrading and construction of the wastewater infrastructure system in 15 towns and villages located in West Irbid; by laying public sewer infrastructure that would serve a catchment area of approximately 21km². Where necessary, this would include the installation of pumping stations, enabling the communities to connect effectively to the wastewater network and to the existing wastewater treatment plants.

This document is the Stakeholder Engagement Plan (SEP) for the Project and describes the Project’s approach to stakeholder engagement throughout its lifecycle and includes the community grievance mechanism for stakeholders to raise concerns about the Project. This SEP has been developed in accordance with EBRD’s requirements with respect to stakeholder engagement. This SEP will be disclosed publicly.

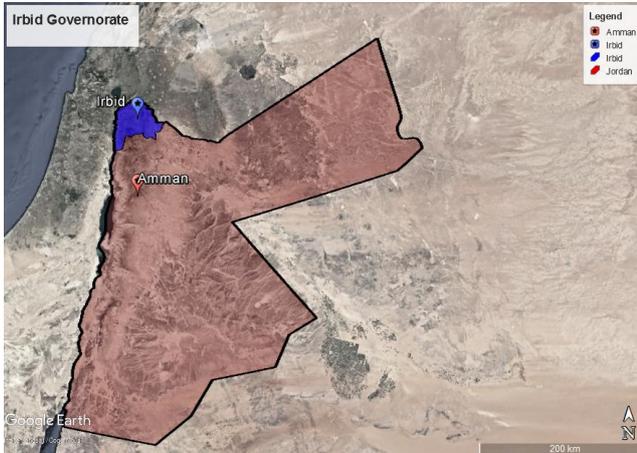
1.1 General approach to stakeholder engagement

This SEP is a strategic document for planning a comprehensive and culturally appropriate approach to consultation and information disclosure over the lifecycle of the Project. This SEP identifies stakeholder groups that could be affected or may have an interest in the Project and describes the means with which these stakeholders will be appropriately engaged through a process of information disclosure and meaningful consultation, to maintain constructive relationships with stakeholders through meaningful engagement during Project implementation and provides a grievance mechanism.

1.2 Project description

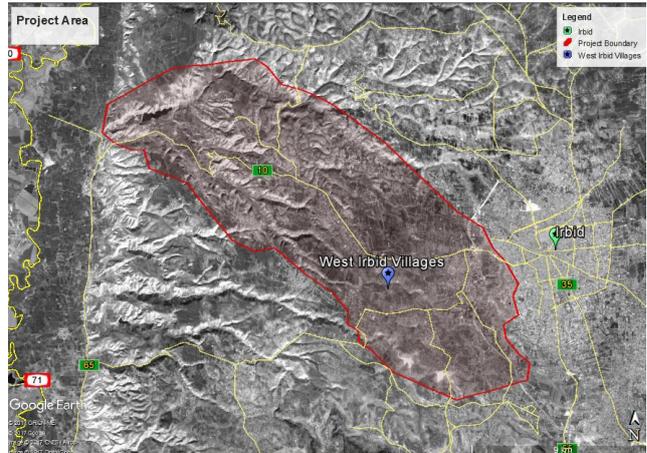
The Project is located in the Irbid Governorate in northern Jordan (shown in Figure 1), approximately 80 km north of Amman. Figure 2 shows the location of the West Irbid area and Figure 3 shows the administrative boundaries of each of the villages within the Project Area.

Figure 1: Irbid Governorate



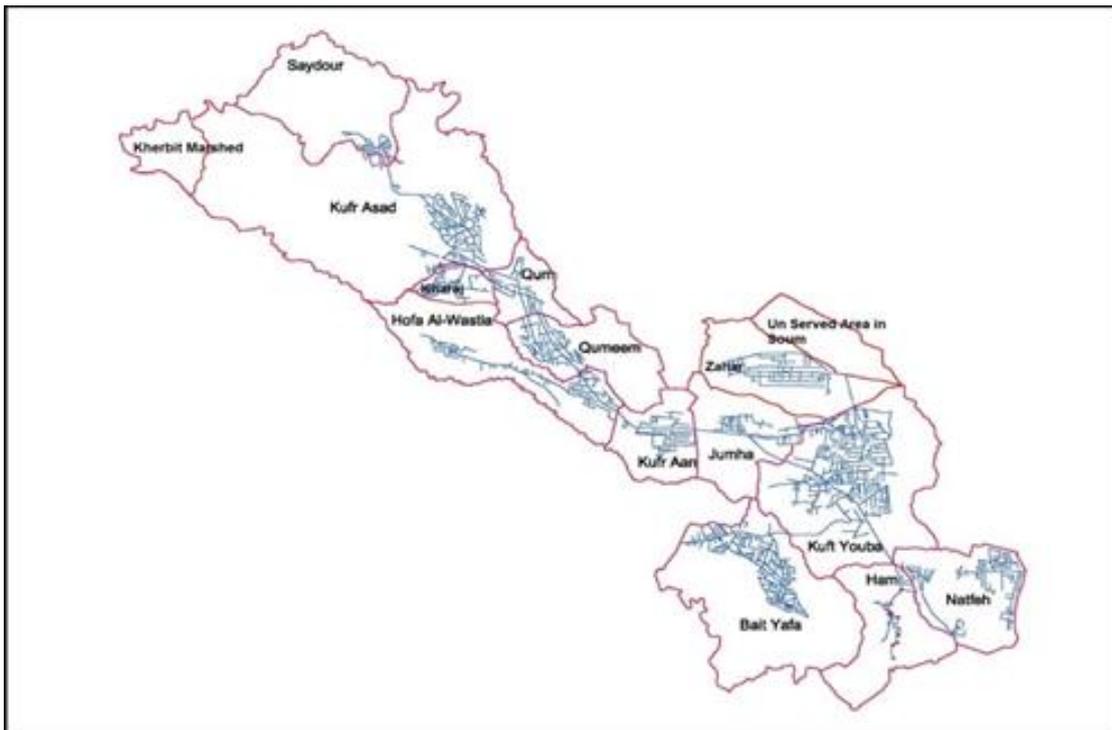
Source: Adapted from google earth

Figure 2: West Irbid Villages Area



Source: Adapted from google earth

Figure 3: West Irbid villages administrative boundaries



Source: ACE Engineers concept design report

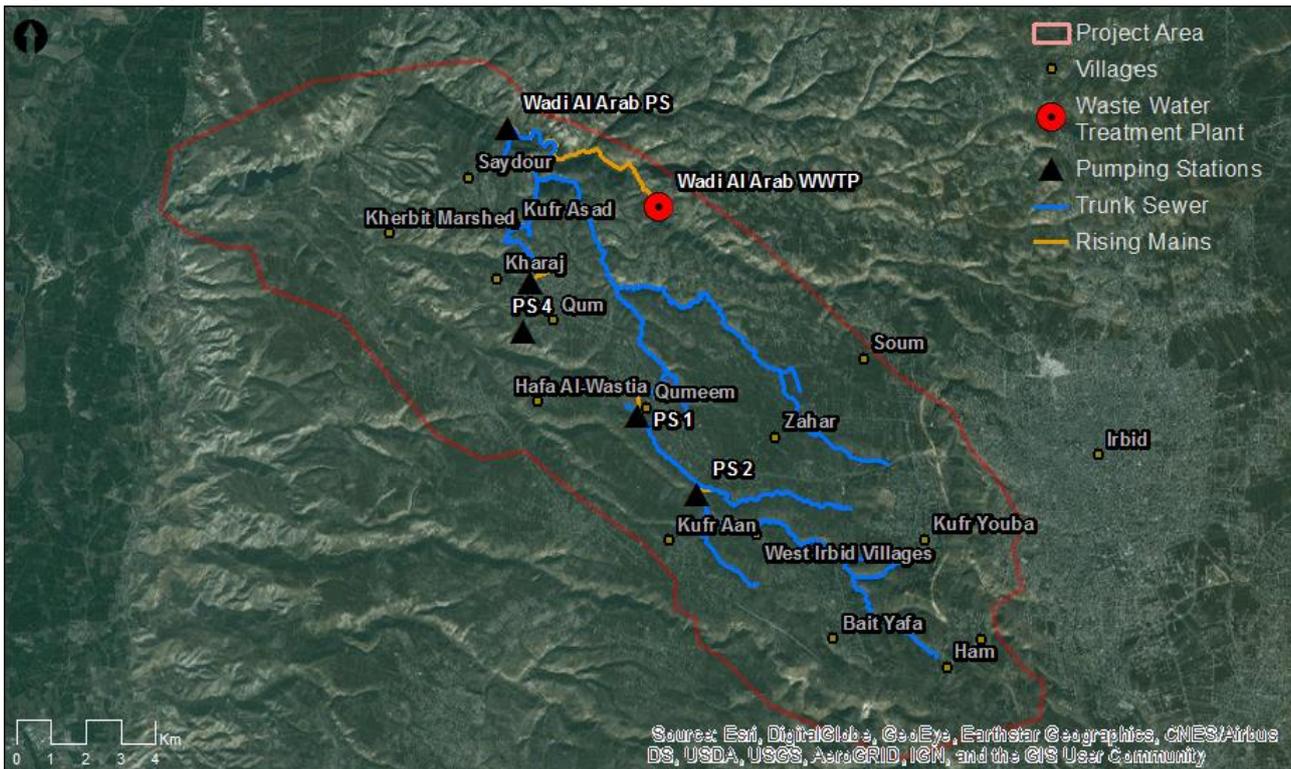
The Project is expected to connect over 2,000 households, serving their needs up to 2040. The closest communities are about 5km from Irbid City and the furthest are approximately 20km away.

1.2.1 Project Area of Influence

The area of influence (Aoi) is defined as the land area within which environmental and social impacts during the construction and operational phases of the Project may occur. These areas will change during the construction and operational phases.

The Project Aoi is approximately 200 km² and is indicated on Figure 4 below:

Figure 4: Project Area of Influence



The project Aoi includes the West Irbid villages of Liwa Al-Wasatiah (Houfa al-Wasatiah, Al-Kharaj, Qumm, Qumeem, Kufr Aan, Kufr Asad, Saydour, KherbetMarshed) (Zahr, Jumhaa, Natfeh, Ham, Bayt Yafa, Kufr Youba), Soum and the areas adjoining the WwTP.

1.2.2 Key project components

Based on the technical feasibility study, a preferred option has been identified. The key components of the Project are the following:

- Strategic trunk gravity sewers and rising mains systems: approximately 58km of large concrete pipeline placed in four-metre-deep trenches along the routes of the main wadis
- Pumping stations: 5 small pumping stations (locations to be confirmed)
- Secondary pipelines and household connections: approximately 80km of secondary pipelines connecting to the strategic sewers and 230km of local sewerage systems connecting individual households

The Project area also includes the existing wastewater treatment plant.

1.3 Summary of previous stakeholder engagement

In line with the national environmental impact assessment (EIA) requirements, a scoping consultation meeting was held in Amman on 6 November 2014, as part of the national EIA. Nineteen participants attended based on a list of potential and relevant stakeholders prepared by the Ministry of Environment (MoE). Attendees included public and private sector organisations and non-governmental organisations (NGOs).

Information was provided about the proposed Project¹ and the national EIA process. Participants provided feedback on the terms of reference for the EIA and concerns they had about the Project. Local stakeholders such as the municipalities or local communities were not involved. The original EIA was approved by the MoE however it is expected that a new EIA will be required to assess the new project option.

1.4 Stakeholder Engagement Plan structure

The remainder of this SEP is structured according to the following sections:

- Stakeholder engagement requirements
- Stakeholder identification and analysis
- Stakeholder engagement programme
- Community grievance mechanism
- Monitoring and reporting

¹ At the time of the scoping session the proposed Project involved the use of the existing Shallaleh wastewater treatment plant (WWTP) in East Irbid and the use of the existing Wadi Arab WWTP in West Irbid.

2 Stakeholder Engagement Requirements

This SEP has been produced to meet the legislation and policy regulations of the GoJ and the information disclosure, consultation and stakeholder participation requirements of the EBRD. These requirements are summarised below.

2.1 National regulatory requirements

In Jordan, there are no specific requirements to undertake public consultation or stakeholder development during project development with the exception of consultation during the scoping stage of an EIA. Under the EIA Regulation No. (37) of 2005, for projects which require an EIA (as for this Project), a scoping session must be held with potentially affected stakeholders at the beginning of the process. The participant list is drawn up by the MoE in partnership with the developer and could include government agencies and some civil society organizations. This list of participants forms the project committee who attend the scoping session. The purpose of the consultation session is to provide project information and solicit their comments and concerns on the project and EIA terms of reference (TOR). The committee may also comment on the completed EIA. The results of the EIA must be publicised to the public and stakeholders. The process for this disclosure is determined by the MoE on a case by case basis, taking into account the nature and type of project development.

2.2 European Bank of Reconstruction and Development (EBRD)

The Project is requesting financing by the EBRD and therefore must meet EBRD's 2014 Environmental and Social Policy (ESP) requirements² including Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement. The Project must also satisfy the Bank's commitment to disclosing project information as set out in EBRD's 2014 Public Information Policy (PIP) document.

The EBRD's ESP defines stakeholder engagement as an on-going process which involves public disclosure of appropriate information, meaningful consultation with stakeholders and an effective procedure or mechanism by which people can make comments or raise grievances. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. The EBRD requires that stakeholder engagement will:

- Provide all stakeholders with access to timely, relevant, understandable, and accessible information, in a culturally appropriate manner, free of manipulation and intimidation.
- Identify and analyse stakeholders, conduct stakeholder engagement and reporting.
- Be proportionate to the nature and scale of the project, impacts public interest.
- Be based on clearly defined roles, responsibilities, and authority.

² The ESP states that stakeholder engagement should be carried out considering the spirit and principles of the UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters which safeguards the rights of citizens to access environmental information.

Special provisions may need to be made to allow disadvantaged or vulnerable groups³ or individuals to be informed about project information and give their views on the project where appropriate.

³ As defined in the EBRD's ESP vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by Project impacts than others and who may be limited in their ability to claim or take advantage of Project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

3 Stakeholder Identification and Analysis

Project stakeholders are people and groups that (i) will be affected by the project, (ii) are likely to be interested, or (iii) could influence the outcome of the Project. These individuals and groups have been identified, including analysis on the best ways to engage with them according to the media that they are likely to use and format they will be most comfortable with.

3.1 Stakeholder identification and analysis

An analysis of Project stakeholders, their interests and suggested communication and engagement methods is summarised in Table 3.1. Over time it may be necessary to modify the list of stakeholders or methods of communication to meet changing circumstances. WAJ will therefore undertake reviews of their stakeholders bi-annually prior to construction commencing and then annually thereafter. In particular, WAJ will build up its stakeholder database with regard to developing a comprehensive list of local community representatives especially for the local tribal families, women and sensitive and vulnerable communities identified.

Table 3.1: Stakeholders Identification and Analysis

Stakeholders	Rationale for inclusion	Communication and proposed media
Community groups and organisations		
Residents and representatives of potentially Project-affected areas (2015 National Census): Nafreh (2,313 residents) Kufr Yuba (22,943) Zahr (7,677) Jumhah (3,450) Ham (2,109) Bayt Yafa (12,804) Soum (10667) Kufr Asad (14,232) Qum (2,274) Qumeem (8,695) Kufr Aan (4,077) Saydour (2,302) Hofa Wastia (7,084) Kharaj (3,907) Kherbit Marshed (244)	Potential interest in how Project construction and operation will affect them with regards to local benefits, opportunities for employment and potential community or environmental impacts. Also, willingness and ability to pay needs on-going consideration.	Public consultation events Information posted on public information/bulletin board in each affected community Ongoing engagement with Community Liaison Officer (CLO) Provision of Project information at local government/municipal buildings in West Irbid and Al-Westiyah Municipalities [addresses and contact information to be provided prior to construction] Announcements to be made in local newspapers and radio [for instance, Al Ghad, Ad-Dustour, Al Ra'i papers and Amman Net] From construction onwards, community grievance mechanism to be disseminated to local community representatives and via CLO interactions with stakeholders nearest the Project sites. Provision of Project Non-Technical Summary and EIA.
Land owners and users (formal and informal users)	Potential interest in how Project construction and operation will affect them with regards to potential impacts on land and livelihoods, local benefits, opportunities for employment. Also, willingness and ability to pay needs on-going consideration.	Public consultation events Ongoing engagement with CLO Information posted in locations
Sensitive and vulnerable groups: Women (50,985) Syrian refugees (9,080) Migrant workers [estimate to be	Potential interest in how Project construction and operation will affect them with regards to local benefits, opportunities for employment and potential	Public consultation events Ongoing engagement with CLO Information posted in locations frequented by vulnerable groups such as

Stakeholders	Rationale for inclusion	Communication and proposed media
provided prior to construction]	community or environmental impacts. Also, willingness and ability to pay needs on-going consideration.	<p>local market place, local schools and health clinic.</p> <p>In addition to the information provided above, the WAJ will organise separate meetings</p> <p>Information posted on public information/bulletin board in each affected community [addresses and contact information to be provided prior to construction]</p> <p>From construction onwards, separate meetings with the CLO to disclose the community grievance mechanism and ongoing Project information</p> <p>Provision of Project Non-Technical Summary and EIA.</p>
Tribal families or tribal leaders within the Project area	Potential interest in how the Project construction and operation will affect them with regards to local benefits, opportunities for employment and potential community or environmental impacts	Ongoing and open dialogue throughout the lifecycle of the Project.
Residents in Irbid Governorate	Interest in the Project but not directly affected	Formal communication with the regional environmental authority
Community Based Organisations (CBOs)	Support from CBOs could help poor or vulnerable households secure funds/payment mechanisms to cover the upfront household costs associated with a sewer connection	Identification and briefing of relevant CBOs
Governmental Authorities		
West Irbid Municipality: Director and department staff responsible for land use planning and management, municipal services (waste management), licensing (within municipal boundaries)	Interest in Project development, dialogue and providing Project information to affected local communities	<p>Ongoing and open dialogue throughout the lifecycle of the Project.</p> <p>Provision of Project documentation including Project Non-Technical Summary and construction and operations environmental and social management plans</p>
Al-Westiyah Municipality: Director, and department staff responsible for land use planning and management, municipal services (waste management), licensing (within municipal boundaries)	Interest in Project development, dialogue and providing Project information to affected local communities	
Irbid Governorate (the Governor)	Interest in Project development, dialogue	
Irbid Environmental Directorate	Regulatory role and / or interest in the development of the Project	
Ministry of Environment (MoE)		
Ministry of Water and Irrigation		
Department of Lands and Survey		
Syrian Refugees Affairs Department - Ministry of Planning and International Cooperation (MOPIC)		
Ministry of Social Development		
Ministry of Public Works and Housing		
Ministry of Municipal Affairs		

Stakeholders	Rationale for inclusion	Communication and proposed media
Ministry of Labour, Department of Land and Survey		
Ministry of Tourism and Antiquities		
Ministry of Agriculture		
Ministry of Health		
Non-government organisations and private sector		
Local wastewater and sewage disposal operators, cess pit builders and companies/individuals involved in cess pit repairs and maintenance	Interest in how the Project's construction and operation will affect their business operations	Ongoing and open dialogue throughout the lifecycle of the Project Provision of Project Non-Technical Summary
<p>NGOs and organisations who work in the Irbid region including the following:</p> <p>International Organisations and NGOs: UNHCR, UNICEF, CARE, Mercy Corps, Save the Children, Norwegian Refugee Council, Danish Refugee Council, Oxfam and International Rescue Committee.</p> <p>Jordanian NGOs: King Hussein Foundation, JOHUD, Jordan River Foundation, Jordan Health Aid Society.</p> <p>Jordanian Organisations: National Council for Family Affairs, Higher Population Council</p>	Support from NGOs could help poor or vulnerable households including Syrian Refugees secure funds/payment mechanisms to cover the upfront household costs associated with a sewer connection	Identification and briefing of relevant NGOs
Jordan Engineers Association (JEA)	Potential interest in Project development	Provision of Project Non-Technical Summary
Royal Society for Conservation of Nature		
National Environment and Wildlife Society		
Jordanian Hashemite Fund for Human Development		
Environmental Societies Association ⁴		
Interested NGOs who identify themselves as having an interest in the Project		
Emergency service providers (West Irbid fire fighters, ambulance services, local health facilities and police)	Interest in Project's progress and possible threats/safety hazards as they may play a crucial role in providing emergency services when required.	Ongoing and open dialogue throughout the lifecycle of the Project. Provision of Project documentation including Project Non-Technical Summary and Emergency Preparedness and Response Plan
Media	Interest in the Project's impacts and status.	Project staff member responsible for media communications and media monitoring identified

⁴ This NGO represents all environmental NGO's in Jordan (such as RSCN, JES, NEWS). An invitation is issued by the MoE to the Association who in turn invites all environmental NGO's to specific consultation events.

Stakeholders	Rationale for inclusion	Communication and proposed media
Internal Stakeholders		
Yarmouk Water Company	Interest as the proposed operator of the Project	Press articles Ongoing and open dialogue throughout the lifecycle of the Project. Provision of Project documentation including project environmental and social assessment and Non-Technical Summary, SEP and construction and operations environmental and social management plans
Employees	Interest in employment opportunities throughout lifecycle of the Project, health and safety issues, and in labour standards (including workers' accommodation standards)	Bulletin board in break room for posting notices, toolbox talks, inserts in payslips, Engagement with Project staff member responsible for workers' liaison Worker grievance mechanism
Temporary construction workers, subcontractors	Interest in employment opportunities throughout lifecycle of the Project, health and safety issues, and in labour standards (including workers' accommodation standards)	Information in contract, bulletin board (multiple languages if applicable), training, code of conduct Engagement with Project staff member responsible for workers' liaison Worker grievance mechanism
Workers' associations	Interest in labour standards and workers' rights	Newsletter, information on request to workers' associations representatives

Source: Mott MacDonald

3.2 Encouraging participation of women and sensitive/ vulnerable groups

The EBRD requires that specific attention is paid to women and vulnerable groups in general which may include vulnerable women and refugees amongst others, to ensure that their views are taken into account in the Project planning and implementation. WAJ recognises that women, vulnerable, marginalised and disadvantaged groups are likely to experience impacts differently from those who are more socially and economically advantaged. As part of the ongoing stakeholder identification and analysis process WAJ will define the criteria for vulnerability. The trained CLOs, with support from local community representatives, local government agencies and local NGOs and refugee support organisations, will use the criteria to enable them to identify target groups in the project area. Surveys regarding land acquisition should be utilised to extract socio-economic information about land owners and assess their degree of vulnerability⁵. Identification of sensitive and vulnerable groups affected or interested in the Project is ongoing but is likely to include refugees (Syrian, Palestinian and others), and migrant unskilled labourers (e.g. from Egypt), the elderly or disabled, people living below the poverty line. All consultation activities will be planned to facilitate the active participation of identified vulnerable groups in public meetings. Consultation activities will be used to gather information and opinions on how different groups are affected. Consultation and information disclosure activities will take into consideration logistical and cultural factors such as physical access, gender roles, literacy levels, and time availability of vulnerable groups.

Separate meetings will be held for women and facilitated by women only, in accessible venues. Consideration will be given to the timing of meetings to encourage the widest participation of women due to household or childcare commitments. Invitations for meetings and Project

⁵ WAJ may decide to work with appropriate third parties, such as research organisations or local NGOs to assist in the identification and analysis of vulnerable groups.

information will also be placed in locations that women frequent e.g. schools, health clinics and local market places.

One aspect of the Project that requires engagement with vulnerable population is over their ability to cover their on-property connection costs. Household connections included in The Project only extend to the property boundary and households will thus have additional connection costs that need to be covered.

4 Stakeholder engagement programme

4.1 Overview

This section describes the main activities that will be undertaken on an on-going basis throughout the lifecycle of the Project. A range of information will be disclosed to stakeholders so that they are informed about the Project. Stakeholders will also have the opportunity to comment on the Project and submit grievances through all of the Project's phases.

Consultation will occur at the community level as well as at municipal, regional and national levels. The sections below describe approaches and activities for preconstruction, construction and operation phases. All consultation will be logged in a format similar to that provided in Appendix A. The levels of involvement and communication methods to be used have been outlined in the previous chapter (Table 3.1). The consultation process will capture both men and women's views and reflect their different concerns and priorities about impacts, mitigation mechanisms, and benefits.

4.2 Roles and Responsibilities

The WAJ will have overall responsibility for undertaking stakeholder engagement and information disclosure activities during the construction phase, although it is likely that some consultation activities will be delegated to the main contractors. WAJ will be responsible for the distribution of relevant documents in Arabic to the appropriate stakeholders, as well as publication of relevant media notices. The main contractors will be responsible for providing accurate and up to date information to the CLO regarding project activities and timeframes, as well as reporting any community grievances received. The main contractors' Project Managers will be responsible for incorporating summaries of grievance reporting into monthly and quarterly reports.

In the operation phase, the Yarmouk Water Company (YWC) will be responsible for stakeholder engagement, including information disclosure, consultation and reporting after commissioning and WAJ's hand over of the Project.

4.2.1 Community Liaison Officer

Prior to construction, WAJ will appoint a Community Liaison Officer (CLO) with responsibility for implementing and managing the SEP and grievance mechanism. The CLO will be responsible for community liaison as well as arranging and maintaining communications with Project affected communities during the construction and operational phases. Specifically, the CLO will be responsible for:

- Managing the implementation of the grievance mechanism
- Attending stakeholder engagement activities and maintaining records in the stakeholder log
- Undertaking visits with Project-affected communities and other stakeholders to keep them informed of Project activities and likely impacts and mitigation measures, and to provide them with the opportunity to voice their comments and concerns about the Project
- Reporting of stakeholder engagement and information disclosure activities to WAJ, lenders and other stakeholders as required.

WAJ will also appoint a female CLO or female staff with responsibility to undertake stakeholder engagement activities as directed by the CLO. The female CLO (or equivalent) will be

responsible for liaising directly with women within the affected communities and can be a direct point of contact should women feel more comfortable discussing concerns with another woman.

All general comments, queries and grievances can be submitted to the Community Liaison Officer, female CLO (or equivalent) or voiced through community representatives.

During construction, the main contractors will be required to appoint their own CLOs who must liaise with WAJ's CLO regarding implementation of the SEP.

4.2.2 CLO contact details

Contact details of the Project's CLO are provided in Table 4.1.

Table 4.1: Community Liaison Officer details for construction and operations phases

Details	Construction Phase	Operations Phase
CLO's name	TBC	TBC
Company	TBC	Yamouk Water Company
Address	TBC	TBC
Telephone	TBC	TBC
Fax	TBC	TBC
Email	TBC	TBC

4.3 Stakeholder engagement and disclosure activities

An Environmental and Social Assessment has been undertaken for the Project. A local EIA will need to be undertaken for the updated Project design although this will be confirmed by the Ministry of Environment. Should a national EIA be required, additional consultation and stakeholder engagement activities will be undertaken to meet EIA and EBRD PR requirements. The SEP (in particular Table 3.1) will be updated to reflect these additional activities.

A Non-Technical Summary has been developed for the Project will be publicly disclosed in Arabic to the stakeholders (as outlined in Table 3.1). Details will include a contact within WAJ who can be approached if a stakeholder has a comment or concern about the Project.

During the construction and operation phases, the Project will disclose information about activities that may affect communities including construction timeframes through the CLO and local media. Information will also be shared about the Project's community grievance mechanism (section 5). The Project will need to report on stakeholder engagement, including the use of grievance mechanism, consultation and information disclosure events.

Table 4.2 outlines activities, timing and responsibilities of disclosure and consultation activities.

Table 4.2: Stakeholder engagement implementation timescales and responsibilities

Activity	Timing/detail	Responsibility
1) Project design phase		
Disclosure of Non-Technical Summary	Online through EBRD.com. Disclosed locally thereafter.	WAJ
Media communications	In response to media requests or when press releases are deemed relevant. Media monitoring for external reports on the Project	WAJ
2) Pre-construction phase		
Appointment of CLO	Appointment of CLO and female CLO (or equivalent) two months prior to construction commencing.	WAJ

Activity	Timing/detail	Responsibility
	<p>One month prior to construction commencing, introduction of CLO to local communities, waste tanker operators and other key stakeholders.</p> <p>Separate meetings will be held with women, and if required other vulnerable groups.</p>	
Construction schedules and updated Project information	<p>One month prior to construction commencing.</p> <p>Project schedule and updated Project information will be made available to local communities, women and vulnerable identified groups, tribal family representatives, waste tanker operators, municipal community representatives and local government agencies.</p> <p>Separate meetings will be held with women, and if required other vulnerable groups.</p>	Main contractors and CLO (WAJ)
Disclosure of community grievance mechanism	<p>One month prior to construction commencing.</p> <p>Community grievance mechanism to be explained and grievance forms to be disseminated to local community during meetings with to local communities, women and vulnerable identified groups, tribal family.</p> <p>representativeness, waste tanker operators, municipal community representatives, local government agencies.</p> <p>Separate meetings will be held with women, and if required other vulnerable groups.</p>	CLO (WAJ)
Consultation with emergency service providers, and representatives of affected communities on the Emergency Preparedness and Response Plan (EPRP)	<p>One month prior to construction commencing.</p> <p>Consult with agencies responsible for provision of emergency services in the Project area and the local communities regarding contents and contact details in the EPRP to make sure that effective plans are in place.</p>	CLO, health and safety manager (WAJ), main contractors
3) Construction phase		
Ongoing community consultation events and disclosure of Project information with schedules to directly affected communities	<p>Prior to the start and end of construction, and when other key changes in Project activities, including material changes to the Project description to inform communities on risk, impacts and mitigations. Dissemination of Project updates in public notice locations.</p> <p>Separate meetings will be held with women, and if required other vulnerable groups.</p> <p>Verbal communication in Arabic.</p>	Main contractors and CLO (WAJ)
Ongoing community liaison and grievance logging, resolution and reporting	<p>Communications in Arabic with affected community representatives (male and female).</p> <p>Weekly grievance reporting to Contractor Project Manager (PM).</p> <p>Contractor Project Manager to incorporate summary of grievance reporting into monthly and quarterly reports</p>	CLO (WAJ) Contractor Project Manager (PM)
Updates in local newspapers and on radio	As requested or when press releases deemed relevant.	CLO (WAJ)
Updating SEP	Prior to the start and at the end of construction.	CLO (WAJ)
Annual Reporting	<p>Annually.</p> <p>Project specific annual report summarising Project performance, CLO activities including grievances and updates to the SEP.</p>	CLO (WAJ)
4) Operation phase		
Grievance logging, resolution and reporting	Six-monthly grievance reporting to YMC PM.	Operational CLO, YMC PM.
Updating SEP	Annually.	Operational CLO, YMC PM.
Annual Reporting	Information about the Project during its operational phase will be included in YMC's annual reporting to the Lenders.	Operational CLO, YMC PM.

5 Community grievance mechanism

A grievance can be defined as an actual or perceived problem that might give grounds for complaint. WAJ, the main contractor and YMC will work proactively towards avoiding environmental and social impacts and issues through the implementation of impact mitigation measures

and community liaison.

Anyone will be able to submit a grievance to the Project if they believe a practice is having a detrimental impact on the community, the environment, or their quality of life. They may also submit comments and suggestions. Any type of issue can be raised.

The Project will aim to protect a person's confidentiality and will guarantee anonymity in annual reporting. Individuals will be asked permission to disclose their identity. Investigations will be undertaken in a manner that is respectful of the complainant and the principle of confidentiality. The complainant will need to recognise that there may be situations when disclosure of identity is required and the Project will identify these situations to see whether the aggrieved party wishes to continue with the investigation and resolution activities.

Separate, internal grievance mechanism will be made available for WAJ and YMC employees. The main contractors will also have their own grievance mechanism for contracted workers, once construction commences.

5.1 Grievance reporting and resolution

Grievances will be formally logged and will be the responsibility of the CLO, although the responsibility for processing and investigating the grievances will lie with the relevant departments within the WAJ or the contractors during construction and YWC during operations. The grievance log will be separate from a stakeholder log which details interactions with communities and stakeholders. People may register grievances verbally or in writing by using the form in Appendix B, by contacting the CLO, or by reporting to their village/town representative or tribal family head/elder. Grievances may also be raised with the main contractor or subcontractors in the construction phase. When this occurs, the contractors must forward grievances to their CLO for management. Contact details for the CLOs and female CLOs (or equivalent) will be included in appropriate Project communication materials. Receipt of a grievance will be acknowledged within seven days.

The CLO will classify grievances. Classification criteria are provided in Appendix C. Where investigations are required Project staff within WAJ, YWC or contractors will carry out the investigations. Outside authorities, as appropriate, will assist with the process. The CLO will collaborate with WAJ, the main contractor or YWC management, depending on the Project phase, to identify an appropriate investigation team with the correct skills to review the issue raised. Alternatively, WAJ may constitute a grievance committee comprising of representatives from different departments to investigate grievances. The investigation will also aim to identify whether the incident leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be part of the investigation activities.

The CLO or female CLO (or equivalent) will explain to the complainant, orally or in writing, the grievance review process, the investigation results, any changes to activities that will be

undertaken to address the grievance, and how the issue is being managed to meet appropriate environmental and social management systems. In some cases, it will be appropriate for the CLO to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. The grievance will be closed out in the register as:

- Resolved. The resolution has been communicated, agreed and/or implemented.
- Unresolved. The complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- Abandoned. The complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of GoJ.

The CLO will summarise grievances weekly or monthly during construction and bi-annually during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The procedure will be at no cost and without retribution to the complainant and stakeholders. A flow chart diagram illustrating the procedure for processing grievances is provided in Appendix D.

6 Monitoring and Reporting

Consultation and stakeholder engagement will continue throughout Project preparation, construction, and operation phases. As discussed above, WAJ and the main contractor will be responsible for ensuring good relationships with local communities during the construction phase. WAJ will be required to report on community engagement and grievance aspects as well as social and environmental monitoring results. During operations, YMC will maintain relationships with local stakeholders and be responsible for reporting on Project performance.

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

- Project information disclosure activities
- Stakeholder consultations
- SEP updates
- Grievance logging, tracking and closing out
- Annual reporting:
 - Construction phase: Project specific annual report summarising Project performance and CLO activities
 - Operations phase: Project information included in the Project's annual sustainability reporting, or equivalent

Minutes of any consultation meetings will include the date, location and list of participants. All original written consultation correspondence, including comments, will be retained as evidence of the process and outcomes. Minutes of meetings, or summaries of individual or informal discussions will be kept on file and available on request. When appropriate, photographic evidence of consultations will be maintained.

During construction, monitoring of grievances and community engagement will be reported on a monthly basis. The CLO will provide weekly summarises of community grievances and community meetings to the Main Contractor Project Manager who will incorporate these into the monthly construction reports to WAJ, and the quarterly and annual construction reports to WAJ and the lenders. During operations the CLO will report on grievance monitoring and community liaison to YWC's project manager (or equivalent) on a monthly basis. Analysis of grievance monitoring will be incorporated into the project's annual reporting.

This SEP will be revised by the CLO and project manager prior to the start and bi-annually during the construction phase. Therefore after it will be revised prior to commencement of operations, and annually by the CLO. Revisions should take into consideration the following::

- Type of consultation and disclosure activities are still appropriate for the different stakeholders
- Frequency of consultation activities is still sufficient
- Grievances are being adequately dealt with
- Stakeholder list remains appropriate and whether engagement should cease or be extended to any stakeholders.

A. Example of a stakeholder engagement log

B. Grievance Registration Form

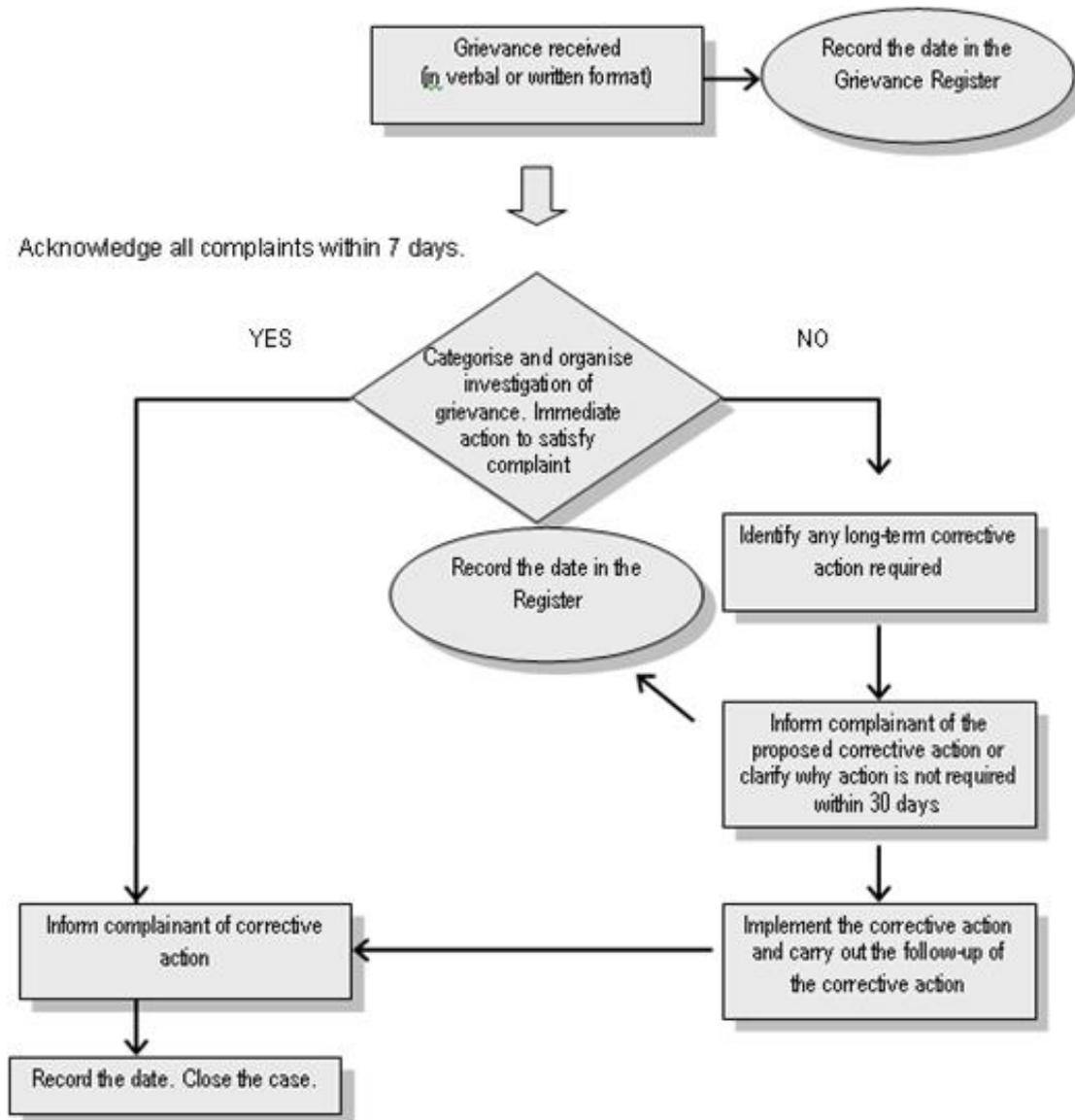
Full Name (you may remain anonymous should you so wish).	
Contact Information Please identify how you wish to be contacted (mail, telephone, e-mail)	By Post: Please provide mailing address By telephone: By e-mail:
Preferred language of communication?	Arabic English Other (please specify).....
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? ____) On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only Grievance received by: Date: Reference number:	

C. Grievance Classification Criteria

Classification	Risk Level (to health, safety or environment)	Response
Low	No or low	The grievance may not be related to Project performance, it may be a comment, or a request. CLO* will conduct an investigation if required, document findings, provide a response. Response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	CLO* and an appropriate investigation team will conduct the investigation. The Site Manager or Occupational Health and Safety Manager may decide to stop work during the investigation to allow the corrective preventive actions to be determined. The CLO* will provide a response within 30 days. The corrective action is likely to be straight forward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probable risk and could reoccur	CLO* will get the Project Manager to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO* will provide an initial response within seven days. As necessary the response will include a press release. A corrective action will be communicated to the complainant within 30 days. The corrective action may be complex or sensitive involving changing equipment or a procedure which requires training of staff and has substantial cost implications.

*Note: For labour related grievances, the HR manager may substitute the CLO.

D. Flowchart for processing grievances



Source: Mott MacDonald

