

**ENVIRONMENTAL AND SOCIAL ASSESSMENT FOR EBRD
GREENFIELD: CATEGORY “A” PROJECT**

JORDAN: THE NORTH SUBSTATION AND OHTL PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

September 2024

FINAL

REV. 04



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ABBREVIATIONS

AC	Alternating Current
CBOs	Community based Organisations
CLO	Community Liaison Officer
DC	Direct Current
DCT	Double-Circuit Transmission Towers
DLS	Department of Land and Survey
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHSS	Environment, Health, Safety, and social
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement, and Construction
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism

HSE	Health, Safety, and Environment
HTLS	High Temperature Low Sag
HV	High Voltage
IC	Implementation Consultant
JCA	Jordan Contractors Association
JEA	Jordan Engineers Association
JSMO	Jordan Standards and Metrology Organization
KV	Kilovolt
LV	Low Voltage
MoA	Ministry of Agriculture
MoEnv	Ministry of Environment
MoF	Ministry of Finance
MoH	Ministry of Health
MoL	Ministry of Labour
MoLA	Ministry of Local Administration
MPWH	Ministry of Public Works and Housing
MV	Medium Voltage
MW	Megawatt
MWI	Ministry of Water and Irrigation
NEPCO	National Electric Power Company
NTS	Non-Technical Summary
OHTL	Overhead Transmission Line
OPGW	Optical Ground Wire
PIP	Public Information Policy
PR	Performance Requirement
PV	Photovoltaic
RF	Resettlement Framework
ROW	Right of Way
RP	Resettlement Plan
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan
SLD	Single Line Diagram
STATCOM	Static Synchronous Compensator

1. INTRODUCTION

1.1 Background

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing a sovereign-guaranteed loan to the National Electric Power Company (“NEPCO”), a company wholly owned by the Government of Jordan (GoJ), with a tenor of up to 18 years and a grace period of up to 3 years. The loan agreement between EBRD and NEPCO is anticipated to be signed by December 2024.

The proceeds will be used to develop and build the following:

1. The North Substation which is a new 400/132/33 kV transmission substation, and related equipment in the Rihab area, located around 61km northeast of Amman, Jordan.
2. The overhead transmission line (OHTL) with several new route connections with the following lengths: 31 km double line (two lines each 31 km), 3 km, and 9 km and replacement for an 11 km existing line.

Together, the North Substation and the OHTL are referred to as (the “Project”). (See Figure 1)

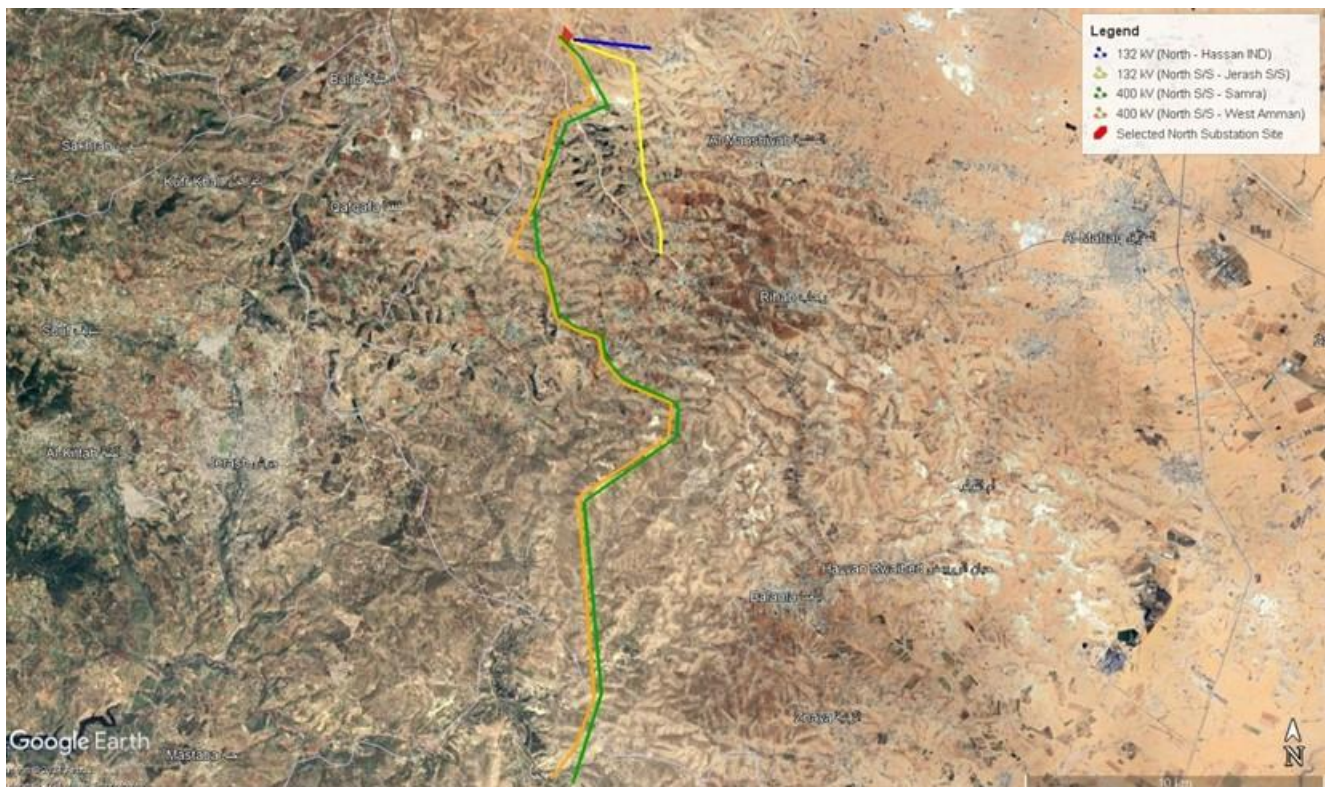


Figure 1: Map Showing Proposed Location of the North Substation and OHTL

1.2 The Need for the Project

The current issues that trigger the need to establish the North substation:

- Congestion in the area due to increasing generation sources (traditional and solar energy projects), leading to bottlenecks and overloading of electrical components under contingency conditions.
- There are voltage problems in the northern region during peak load periods.
- Bottlenecks in the northern region’s transmission lines, which could result in cascading outages if not addressed.

Establishing the substation will address these challenges and bring several benefits to the energy infrastructure, reliability, and grid stability, which include:

- Avoiding the congestion and overloading in this region, thus ensuring smoother energy flow, and reducing the risk of system failures.

- Enhancing grid stability by maintaining voltage levels within standard values according to the grid code, especially during peak load periods under contingencies.
- Increasing the reliability of the electrical grid by mitigating the risk of cascading outages, thereby ensuring uninterrupted power supply to the northern region.
- Improving capacity of the electricity system to absorb existing renewable energy generation in the Northern area, as well as allow for the development of up to 600 Megawatt (MW) of additional solar PV generation capacity in the Rihab-Mafraq area.
- The new 400 kV substation is considered as Phase I of the Eastern Corridor Project which will ultimately develop additional switching stations and high voltage transmission lines in the northeast part of Jordan under Phase II, thus allowing for additional renewable energy capacity to be connected to the grid.
- Furthermore, this Project aims to further advance the Bank's policy engagement in the power sector and builds on the two previous transactions with NEPCO which included significant policy work focused on corporate governance and compliance, and equal opportunities for women and youth (NEPCO Restructuring loan¹).

1.3 Lender Environmental and Social Requirements and Project Category

As this Project is a greenfield Project that could result in potentially significant adverse future environmental and/or social impacts, the EBRD has categorised the Project as "A" in terms of its 2019 Environmental and Social (E&S) Policy, which means that a comprehensive Environmental and Social Impact Assessment (ESIA) and review of associated documents must be carried out, followed by their public disclosure for a minimum period of 120 days.

The EBRD commissioned an environmental and social (E&S) consultant to prepare an Environmental and Social Impact Assessment (ESIA)² for the Project to identify and assess any potentially significant future adverse E&S impacts associated with the proposed Project, assess compliance with applicable national laws and the EBRD ESP 2019, determine the measures needed to prevent or minimise and mitigate the adverse impacts, and identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project. This ESIA is being prepared for financing requirements and not to obtain a local environmental permit.

The ESIA shall also cover any associated facilities in relation to the Project. As defined in the ESP 2019, Associated facilities are not financed by EBRD as part of the Project but in the view of EBRD are significant in determining the success of the Project or in producing agreed project outcomes. These are:

1. NEW facilities or activities.
2. Without which the project would not be viable. and
3. Would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.

There are no associated facilities related to this Project.

The Project shall be planned and executed in a manner that ensures E&S compliance and alignment with all national applicable legislation, and with international best practice. In addition to the national legislations, the Project will comply with the ESP 2019 of the EBRD and its associated Performance Requirements (PRs).

¹ NEPCO Restructuring Loan (2018) Project Summary Document (PSD) published on EBRD website: <https://www.ebrd.com/work-with-us/projects/psd/nepco-restructuring-loan.html>

² An Environmental Assessment study is referred to as EIA when it is undertaken in accordance with local requirements and as an Environmental and Social Impact Assessment (ESIA) when it is undertaken in accordance with International Financing Institution requirements. Both terms are used in this report without any difference in scope and content since the EIA considers international financing requirements.

This document is the Stakeholder Engagement Plan (SEP) for the Project, which describes the planned stakeholder consultation activities and engagement process as well as a grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

1.4 Parties Involved in the Project

Table 1 below provides the key entities involved in the Project and their involvements.

Table 1: List of Key Entities Involved in the Development and Implementation of the Project

Entity	Involvement and Relevance to the Project
NEPCO	<ul style="list-style-type: none"> ▪ “Borrower” of the loan provided by EBRD. ▪ The owner and operator of the Project. ▪ Providing a preliminary design of the substation and the OHTL. ▪ Selecting the Engineering, Procurement, and Construction Contractors for the substation and the OHTL through an open procurement process. ▪ Undertaking the site selection and land acquisition for the substation location including related compensation. ▪ Reviewing and approving the detailed design and the OHTL route prepared by the Engineering, Procurement, and Construction (EPC) Contractor and undertaking compensation procedures for the Right of Way (ROW) of the OHTL. ▪ Preparing and submitting reports to the Lender (EBRD) in relation to E&S compliance and implementation of the Environmental and Social Action Plan (ESAP) commitments integrated in the loan agreement. ▪ Installing the electrical components for the Substation. ▪ Undertaking operation and maintenance of the substation and the OHTL.
EBRD	<ul style="list-style-type: none"> ▪ The Project financier and responsible for the monitoring of E&S safeguard compliance.
Contractors and Subcontractors	<ul style="list-style-type: none"> ▪ Providing the final design of the Substation and the OHTL. ▪ Undertaking the construction activities of the substation and the OHTL.
Ministry of Environment (MoEnv)	<ul style="list-style-type: none"> ▪ The official governmental entity responsible for the conservation and improvement of the environment in Jordan. MoEnv is also responsible for reviewal and approval of the ESIA and granting the environmental clearance and permit for the project.
ECO Consult	<ul style="list-style-type: none"> ▪ Is the Consultant assigned by the EBRD to prepare the ESIA for the Project.
Project Implementation Unit (PIU) Consultant	<ul style="list-style-type: none"> ▪ Is the PIU Consultant assigned by EBRD through an open procurement process to provide organisational and technical assistance to NEPCO to ensure the successful planning and implementation of the Project in accordance with the Project Implementation Plan (PIP) and with all EBRD requirements stipulated in the Loan Agreement including E&S requirements and the ESAP implementation.
E&S Implementation Consultant (IC) ESAP	<ul style="list-style-type: none"> ▪ Is the E&S Consultant to be assigned by EBRD to work with NEPCO over a 24-month period to implement the E&S requirements of the EBRD and the ESAP measures. This contract will be financed by EBRD.

1.5 Stakeholder Engagement Plan Objectives

The main purpose of the Stakeholder Engagement Plan (SEP) is to describe how NEPCO intends to communicate with stakeholders during the implementation of the project including but not limited to: potentially affected communities, employees, suppliers and beneficiaries during the project life and how it will be effectively managed, without negatively impacting the project. The SEP will ensure that stakeholders are engaged throughout the project lifecycle.

The objectives of stakeholder engagement within the context of the project are the following:

- Identifying the main stakeholders of the project and their potential concerns.
- Inform the identified stakeholders about the project and its proposed activities through appropriate engagement channels.
- Provide the opportunity for identified stakeholders to participate in the process of identifying any potential impacts.
- Ensure appropriate approach and adequate focus is adopted during the project implementation.

- Ensure that the identified stakeholders are appropriately engaged on issues that potentially affect them in addition to managing the Public Grievance mechanism that will be adopted by NEPCO during project implementation, especially during any construction activities.
- Establish and maintain an ongoing relationship with the stakeholders affected (positively or negatively) by the project.
- Establish, maintain, and improve the worker-management relationship, and ensure that the workers grievance mechanism is accessible, and workers/employees concerns are addressed in a timely manner.
- Engaging with existing workers and/or workers organisations whenever applicable in accordance with the Jordanian Labour Law.

2. PROJECT AREA

2.1 The Substation

2.1.1 Substation Location

NEPCO had considered two (2) alternative locations for the location of the substation. These potential locations were as follows and are shown in **Error! Reference source not found.**:

- Alternative 1: land “Tamirah”, which is around 120 dunums³ (0.12 km²)
- Alternative 2: land “Albarakeh”, which is around 18 dunums (0.018 km²)



Figure 2: Alternative 1 "Tamirah" Land



Figure 3: Alternative 2 "Albarakeh"

³ 1 Dunum = 0.001 Square Kilometres



Figure 4: Alternative 2 "Albarakeh" Surrounding Community Depicted from the Site

- Alternative 1 "Tamirah":
 - Located at around 0.75 km from the main road.
 - Almost all the neighbouring lands are vacant with no existing current land use, only a very few residential properties are located at around 1.5 km to the east of the "Tamirah" land as shown in Figure 2 and Figure 3.
 - During the site visit undertaken by the E&S Consultant in 2022, the land was vacant and unused. **A subsequent visit to the site in June 2024 indicated the land was ploughed and planted with barely.** A review of historical aerial images for the area indicated that the site has been ploughed and planted (with barely) in 2015, 2019, 2023, and 2024 only. The aerial images did not show this being undertaken regularly on an annual basis. Based on discussions with one of the owners, it was understood that in some years, he ploughs the land and plants it with barley for fodder production. They only rely on rainfall for irrigation so not all years are successful such as in 2024 the rainfall season was not sufficient in the area and as such the barley crops were not harvested and only left in place to dry.
- Alternative 2 "Albarakeh":
 - Located adjacent to the main road at around 0.1 km.
 - Two (2) villages are located east and west of the "Albarakeh" at less than 0.5 km as shown in Figure 3 and Figure 4.

Tamirah site meets several of the substation site selection requirements such as:

- Rectangular or square in shape for ease of proper orientation of bus– bars and feeders.
- Far away from obstructions, to permit easy and safe approach / termination of high voltage overhead transmission lines.
- Easily accessible to the public road to facilitate transport of material.
- Preferably levelled ground. This facilitates reduction in levelling expenditure.

As such, the E&S Team recommended the selection of Alternative 1 land "Tamirah". Figure 5 below shows the location of the selected land for the Substation at different spatial levels (National, Regional, Local and Land Detail).

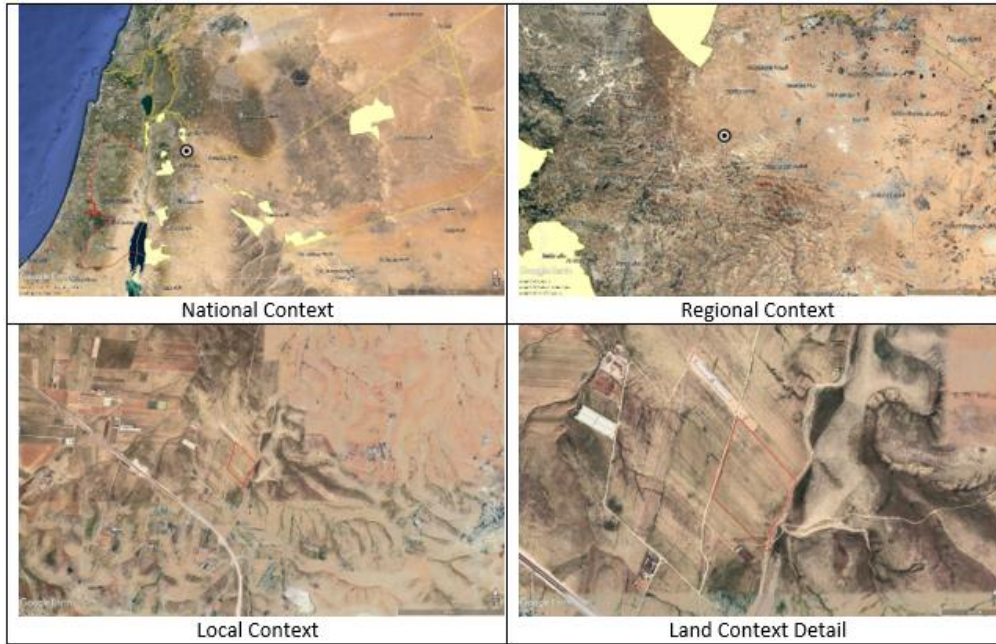


Figure 5: Project Location Contextual Overview from National to Local Scale

Photos taken from site visits in 2022 and 2024 to Alternative 1 land are included in Figure 6 below.



Figure 6: Photos of the Selected Site for the North Substation - Alternative 1 Land "Tamirah"

The selected land for the substation is vacant with no existing current land use other than sporadic seasonal ploughing and planting of barley and is not within proximity of communities and localities. There are no residential settlements, or obvious sensitive receptors nearby. In 2022 the area was completely vacant and roads leading to the general area of the substation land and the substation land itself were still under construction. However, the visit in 2024 indicated some land use activities taking place in the area but still dispersed with no residential land use. The new land uses have been attracted by the wide and paved road network leading to the general area.

The land is composed of 10 adjacent plots, collectively owned by 172 individuals. NEPCO will fully acquire 4 of these plots and portions of the remaining 6 plots.

NEPCO was advised to undertake a direct negotiation and purchase the land plots from their owners. However, given the large number of landowners, according to NEPCO, they already carried out land acquisition for land plots of a total of around 120 dunums to establish the substation and the land acquisition has already been approved.

According to article No. 180 within the Real Estate Law No. 13 of 2019 issued by the Ministry of Finance (MoF), land acquisition without negotiation with the landowners for a public benefit project is permitted by law, if the negotiation process for the project was found difficult. This is not in compliance with the EBRD ESP 2019 and associated PRs.

This involuntary land acquisition process would trigger EBRD PR5 which is related to “Land Acquisition, Involuntary Resettlement and Economic Displacement”. This is investigated and assessed by the E&S Team in a separate “Resettlement Framework” (RF) report and a land acquisition and resettlement audit report.

While NEPCO is carrying out the land acquisition and compensation process in accordance with the local/national relevant legislations in Jordan (the Real Estate Law No. 13 of 2019), some additional measures are required to be implemented by NEPCO to bridge gaps identified between the process carried by NEPCO and the EBRD PR5 requirements which are outlined in the RF Report and a land acquisition and resettlement audit report and in the Environmental and Social Action Plan (ESAP) prepared by the E&S Team to be included as part of the loan agreement.

2.1.2 Substation Phases and Activities

- Construction and operation requirements for the substation:
 - Substation construction and operation requirements is determined by the NEPCO’s Planning Department and provided to the Design Department. The layout of the substation is developed by the Design Department. The Civil Works Department is responsible for developing the layout of the associated infrastructure and utilities such as access roads, offices, etc.
 - Generally, the Execution Department and Civil Works Department are responsible for the construction works internally by NEPCO staff. A Contractor is assigned through a tendering process to supply the equipment only and NEPCO does not require a Contractor to undertake the construction of the substation. However, in the case of this Project, it is expected that EBRD will require NEPCO to assign an EPC Contractor through an open tendering process to undertake the design, procurement, and construction of the Substation. NEPCO related staff may undertake the electrical and mechanical installations for the substation.
- After the design, tender and procurement, the key activities to be undertaken by the Contractor during the construction phase are anticipated to include the following:
 - Design, bill of quantities, and procurement and supply of material.
 - Establishing the work zone, fencing it off and using signs to ensure the safety of the access points.
 - Preparing the substation site which involves ground levelling and earthwork.
 - Preparing the laydown and storage areas and transport of material and equipment to the site.
 - Excavating and laying foundations such as building the formwork, installing the reinforcements, and pouring concrete.

- Installing the grounding grid for the safety of people and the equipment.
- Building the command building for the equipment.
- Backfilling the foundations and substation yard.
- Assembling the steel structures.
- Installing the electrical equipment and connecting them to the control room.
- Carrying out the final inspection.
- Undertaking the commissioning works for the substation.

2.2 The OHTL

2.2.1 OHTL Route

The OHTL starts from an area outside municipal boundary between the Al-Hashimeyeh municipality to the east and Birein municipality to the west, which is located in Zarqa Governorate and passes through several districts and localities and ends at the selected Project site in Rihab locality. The North Substation will be connected to the 400 kV OHTL on the 400 kV side, in addition to connecting with the Al Hassan Industrial Estate and Jerash 132/33 kV substations on the 132 kV side. Figure 7 below shows the provisional OHTL route provided by NEPCO.

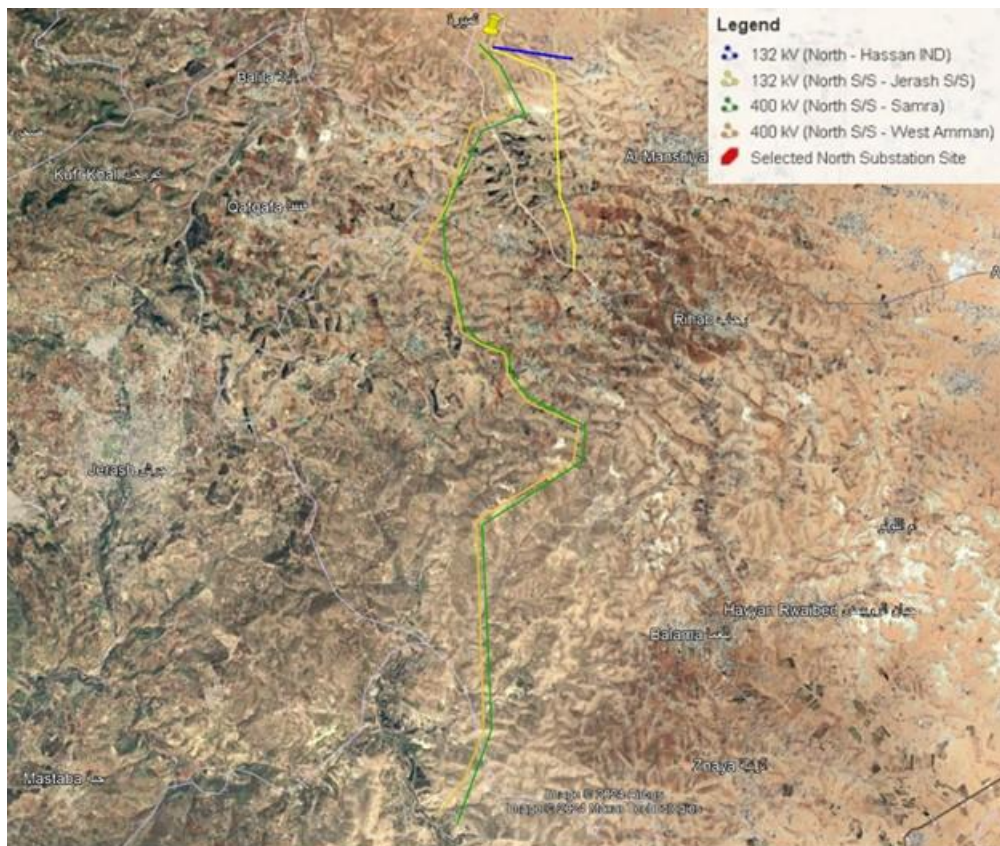


Figure 7: Provisional Route Provided by NEPCO for the OHTL

The proposed OHTL route passes through various private lands with existing land uses including agricultural areas with trees and crops and forest (Haraj) areas, as well as residential and others. Parts of the OHTL route is currently used by existing households, farms, and a very limited number of nomads – such areas should be avoided by the EPC contractor during the detailed design.

NEPCO indicated that this route is only a preliminary route and will be finalised after site specific surveys to be undertaken by an EPC Contractor selected through an open tendering process for the OHTL design, procurement, and construction works. The Contractor will also be required to review land documents and cadastral maps from the Department of Land and Survey (DLS) and from relevant municipalities to avoid (to the

extent possible) existing and future land use activities and users and other important land use areas. According to NEPCO, the final design of the OHTL will not overlap with any residential buildings/houses.

To determine the optimal preliminary route for the OHTL, NEPCO has officially coordinated with all related government authorities to gather all data related to the OHTL route. Once the EPC Contractor is assigned, NEPCO will issue supporting letters to these authorities to facilitate and obtain no-objection and conditions for the EPC contractor to execute the OHTL.

NEPCO does not acquire the land for the Right of Way (ROW) for the OHTL and only compensates the landowners for potential losses and land use limitations that may arise due to the OHTL passing through their land. This is done in accordance with the General Electricity Law No. 64 of 2002. This compensation process will also be covered in the RF report prepared separately and will provide measures to bridge gaps identified between the process carried by NEPCO and the EBRD PR5 requirements.

2.2.2 OHTL Development Phases, and Activities

After the design, tender and procurement, the key activities during the construction phase to be implemented by the EPC Contractor are anticipated to include preliminary and construction works as follows:

- Preliminary works will relate to the route selection, reconnaissance, and preliminary surveys, as well as approvals and clearances.
- Construction activities will involve:
 - Detailed Survey and Plotting of Profile:
 - Conduct a comprehensive survey of the proposed transmission line route to gather precise topographical data.
 - Plot the profile of the land to determine elevation changes and potential obstacles along the route.
 - Tower spotting and tower schedule.
 - Identifying the optimal locations for tower placement along the transmission line route, considering factors such as terrain, accessibility, and structural integrity.
 - Develop a tower schedule outlining the specifications and placement of each tower along the route.
 - Check survey and location marking.
 - Verify the accuracy of the survey data and ensure alignment with project specifications
 - Mark the precise locations for tower foundations and conductor supports along the route.
 - Installation of foundation anchors.
 - Excavate pits of trenches for tower foundations according to the design specifications.
 - Set the anchor bolts securely in the foundation pits to provide a stable base for tower erection.
 - Erection of towers and fixing of accessories.
 - Assemble tower components on site and erect the towers according to the predetermined schedule.
 - Install accessories such as cross arms, insulators, and lightning arresters on the towers.
 - Stringing of conductors and earth wire.
 - Pull the electrical conductors and earth wire along the route using specialised equipment
 - Ensure proper tensioning and spacing of the conductors to meet design requirements and minimize sag.
 - Earthing.
 - Install grounding systems at tower locations and along the transmission line route to protect against lightning strikes and fault currents.

- Ensure effective bonding between tower structures and grounding electrodes to maintain electrical safety.
 - Protection of tower footings.
 - Implement measures to protect tower footings from erosion, soil movement, or other environmental factors.
 - Install protective barriers or erosion control measures around tower foundations as needed.
 - Clearing of Right of Way.
 - Clear vegetation and obstacles within right-of-way corridor to ensure safe and unobstructed passage for transmission line.
 - Dispose of cleared vegetation and debris in accordance with environmental regulations.
 - Final checking, testing, and commissioning.
 - Conduct final inspections and checks to verify the integrity and functionality of the completed transmission line.
 - Perform testing procedures, including insulation resistance tests, conductor continuity tests, and line energization tests.
 - Commission the transmission line for operation, ensuring compliance with regulatory standards and safety requirements.
- Energising of the OHTL by NEPCO.

2.3 The Project Timeline

- The Project is planned to be operational and the OHTL energised within 36 months from the signature of the loan agreement between the EBRD and NEPCO.
- Nov/Dec 2024: The loan agreement is expected to be signed.
- Q2 and Q3 2025: Tender phase to assign Contractor is expected to take 6-9 months
- Q4 2025: EPC Contractor to be assigned.
- Q1 and Q2 2026: Site specific survey and assessment of alternatives.
- Surveys and studies as part of the resettlement action plan shall be undertaken in parallel to the site-specific survey and assessment of alternatives for the OHTL alignment and the tower spotting. Required “Organisational Arrangements, Responsibilities and Key Actions for the Resettlement Action Plan” are included in the standalone resettlement framework disclosed along with this ESIA.
- The final approval for the EPC contractor to start the construction works is issued after 15 days of making the announcement if the OHTL towers spotting was submitted.
- Q3 2026 (June): Commence construction
- Construction and commissioning period 24 months.
- Q3 2028 (June): The Project shall be operational and OHTL energised.

3. THE PROJECT DESCRIPTION

3.1 The North Substation

A substation is an installation that interconnects elements of an electric utility’s system. These elements can include generators, transmission lines, distribution lines, and even neighbouring utility systems. An electrical substation is a part of an electricity generation, transmission and distribution system where voltage is transformed from high to low or in reverse using transformers. It also serves as a point of connection between various power system elements such as transmission lines, transformers, generators and loads. To allow for

flexibility in connecting the elements, circuit breakers are used as high-power switches. Electric power may flow through several substations between generating plant and consumer and may be changed in voltage in several steps. There are different kinds of substation such as Transmission substation, distribution substation, collector substation, switching substation and some other types of substations. The North Substation is a transmission substation. The general functions of a substation may include:

- Voltage transformation
- Connection point for transmission lines
- Switchyard for network configuration
- Monitoring point for control centre
- Protection of power lines and apparatus
- Communication with other substations and regional control centre

The key components of the substation are the following: Power transformer, Current transformer, Voltage Transformer, Supervisory Control and Data Acquisition (SCADA) panels, Alternating Current (AC) panels, Direct Current (DC) system, Reactive power system (Static Synchronous Compensator (STATCOM)) - depends on the project, Surge Arrestor, Low Voltage (LV), Medium Voltage (MV) and High Voltage (HV) cables, SCADA Parts and sensors, Servers, Isolators, Gantries, MV Switch gears, Earthing system, Metering panels, billing system, control and protection panels, lighting system, capacitor bank, reactor, and Disconnectors.

NEPCO develops the basic design to include layouts, Single Line Diagram (SLD), structures, etc. for the substation. However, the final design should be provided by the contractor, it shall be developed according to NEPCO requirements and keeping according to international standards in view the functional requirement of the line and substation facilities to meet the major technical parameters and project parameters.

The substation is connected to the network through overhead lines.

Figure 8 below shows a typical view of a substation.



Figure 8: Typical View of a Substation

3.2 The OHTL

The connections are as follows:

- 400 kV OHTL (north s/s – Al Samra s/s) Length: 31 km
- 400 kV OHTL (north s/s -West Amman s/s) Length: 31 km
- 132 kV Super-Heated OHTL (North – Al Hassan Industrial Estate) Length: 11 km, as replacement of existing OHTL conductor + new 3 km OHTL to connect the said OHTL

- 132 kV conventional conductor OHTL (norths/s- Jerash s/s) Length: 9 km

The key OHTL components include:

- Transmission Towers:
 - The main component of the OHTL is the transmission towers.
 - The transmission tower will be a Lattice Steel Structure designed to be three (3) Phases, Double-Circuit Transmission Towers (DCT), which will be the carrier of the conductors that will transport the electrical power between both ends of the transmission line and connect the substation with the High Voltage National Grid. The typical structure of the DCT tower is presented in Figure 9 below.
 - Each transmission tower will consist of the following:
 - Foundations: each tower will be fixed and bolted to the ground through reinforced concrete foundations. There will be four (4) foundations for each tower. The area of each foundation and the tower area between legs depend on many variables including tower type, soil type, and tower extension.
 - Steel structure: the foundations will support the steel structure that will carry the conductors, cross-arms, insulators and shield wire.
 - Conductors: The conductor is the conductive part of the line used to carry electrical energy from one tower to the next until its connection with the High Voltage National Grid. Number of conductors in each line depends on the lines characteristics which was mentioned earlier. Conductors to be used for the lines are (All Aluminium Alloy Conductors) AAAC Yew for 32kV lines, Aluminium conductor steel-reinforced cable / Aluminium Clad Steel (ACSR)/(ACS) 560/50 for 400kV lines, and ACCC for the upgradation part of 132kV as High Temperature Low Sag (HTLS) conductors. The conductors will connect through the cross-arms.
 - Cross-Arms: each tower will have two six (6) steel cross arms (3 on each side) which connect the conductors with the towers.
 - Shield Wire (also known as earth wire): positioned above the phase conductors, the shield wire is grounded at each tower to facilitate the safe and rapid dissipation of voltage surges caused by technical issues or external factors (e.g. lightning).
 - Insulators Strings: Components that are used to connect the conductors to the cross arms of the towers and keeping them insulated and away from any nearby grounded structure. These strings are generally of two (2) types, Suspension, and Tension insulator strings. Insulators isolate the towers from the live wires that carry the electricity.
 - Earth wire/ Optical Ground Wire (OPGW): same as conductors, the OPGW is a conductive part of the line, but it is not used for the electrical power transmission. The conductive part of the cable serves to bond adjacent towers to earth ground and shields the high-voltage conductors from lightning strikes. The OPGW cable is run between the tops of high-voltage transmission towers and pylons.
 - The optical fibres within the cable can be used for high-speed transmission of data, either for the electrical utility's own purposes of protection and control of the transmission line, for the utility's own voice and data communication, or may be leased or sold to third parties to serve as a high-speed fibre interconnection between cities.
 - Infrastructure Elements: Based on discussions with NEPCO, the only infrastructure requirements for the Project will be access roads, which might be required in areas where the towers are inaccessible based on existing site conditions. Such access roads are required for access of construction vehicles and machinery during construction and for maintenance activities during operation. There will be no permanent access roads established for the Project for construction or operation and maintenance activities. Access of vehicles and machinery during construction and for maintenance activities during operation will be only to tower locations. Access will be through existing tracks or dirt roads as applicable that lead directly to each exact footprint location. This will be confirmed and verified as part of the detailed design stage to be undertaken by the EPC Contractor. At this stage the EPC

Contractor has not been contracted and there is no detailed design available. Consequently, whether any additional roads will be required or whether existing access roads will require any expansion and enhancement with any additional land being required is unknown. Should this occur, it can be addressed through the Resettlement Plan (RP) to be prepared once the design is available.

- Generally, for such projects, NEPCO adopts a maximum tower height of 49.65 m and a minimum height of 30.00 m for 132kV transmission line towers, and a maximum tower height of 70.70 m and a minimum height of 49.00 m for 400kV transmission line towers.
- The number of towers, tower spotting, the height of each tower, and towers’ final location, and the final route with its buffer will be determined at a later stage as part of the detailed design studies to be undertaken by the EPC Contractor which will be assigned by NEPCO at a later stage.

Based on information available at this stage from NEPCO, the basic span for towers for 400 kV lines is around 450 m and for 132 kV lines 335 but this defers based on the design, detailed site survey, and crossings with other OHTLs in the area (current and future).

The total number of towers for the OHTL connections is provided in Table 2. Final tower locations and numbers will be determined as part of the detailed design to be undertaken by the EPC Contractor.

Table 2: Number of Towers for the OHTL Connections

OHTL Connection	Number of Towers
400 kV OHTL (north s/s – Al Samra s/s) Length: 31 km	84-86
400 kV OHTL (north s/s -West Amman s/s) Length: 31 km	84-86
132 kV Super-Heated OHTL (North – Al Hassan Industrial Estate) Length: 11 km, as replacement of existing OHTL conductor + new 3 km OHTL to connect the said OHTL	10
132 kV conventional conductor OHTL (norths/s- Jerash s/s) Length: 9 km	28-30

There are different types of towers to be used for 400kV and 132 kV OHTLs. The type of tower that will be used is unknown at this point. The total footprint of the tower is unknown at this point as well. Based on discussions with NEPCO, the minimum and maximum tower footprint is provided below:

- For 400 kV OHTL: 180-900 m²
- For 132 kV OHTL: 80-324 m²

The footprint includes the 4 foundation locations, the area in between, as well as a 1.5m strip to be taken from centre of each foundation based on GIIP.



Figure 9: Typical Structural Components of DCT towers



Figure 10: Typical View of an OHTL

4. REGULATORY CONTEXT

This SEP was developed to comply with the legislation and policy regulations of Jordan and the information disclosure, consultation and stakeholder participation requirements of EBRD. These requirements are summarised below.

4.1 Relevant Jordanian Stakeholder Engagement Requirements & Legislation

In Jordan, there are no specific requirements to undertake public consultation or stakeholder engagement during project development, with the exception of consultation during the scoping stage of an Environmental Impact Assessment (EIA) for projects that fall under category 1 under the Environmental Classification and Licensing Regulation No. 69 of 2020 and its amended Regulation No. 97 of 2020. As this project falls under category 1, the project requires the preparation of a comprehensive EIA, and thus, a scoping or consultation session is required.

4.2 EBRD Requirements

The EBRD considers stakeholder engagement as an essential part of good business practice and a way of improving the quality of projects. As a result, the implementation of the proposed project should comply with the EBRD policies. Stakeholder engagement will be an ongoing process throughout the project, in order to ensure transparency with all stakeholders that may be affected by, or have influence on, the project.

The relevant EBRD requirements within the context of the proposed project include the following:

- EBRD's 2019 Environmental and Social Policy (ESP) particularly the following Performance Requirements (PRs):
 - PR1: Assessment and Management of Environmental and Social Impacts and Issues
 - PR10: Information Disclosure and Stakeholder Engagement.
- EBRD's Grievance Management Guidance Note.
- EBRD's commitment to disclosing project information as set out in the EBRD's 2014 Public Information Policy (PIP) document.

To fulfil EBRD's requirements, it is recommended that NEPCO follows a stakeholder engagement process to provide stakeholders with access to timely, relevant and understandable information, and to identify relevant internal and external stakeholders and engage them throughout the project to ensure effective communication.

This stakeholder engagement plan is designed to be proportionate to the nature and scale of the project and its potential impacts and shall take identified stakeholders into consideration during decision making process and future planning, based on clearly defined roles and responsibilities.

5. IDENTIFICATION OF STAKEHOLDERS

The first step in successful stakeholder engagement is for the client to identify the project-affected parties and those who have interest in the project, and/or the ability to influence its outcomes (positively and negatively / permanently or temporarily).

Based on this definition, stakeholders for the project are classified into two main groups, which are:

- Affected Parties are individuals or groups affected or likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods.
- Interested Parties who represent individuals or groups that may have an interest in the project due to its location, characteristics, impacts, or matters related to public interest.

Table 3 below lists down the key stakeholder groups that have been identified to date. The list can be updated as the project proceed.

5.1 Identified Groups of Stakeholders

Table 3: Identified Group of Stakeholders

Stakeholder		Description	Influence Degree
Interested Parties			
National Electric Power Company (NEPCO)		▪ The owner and operator of the Project and will be the prime stakeholder to make decisions on all aspects of project implementation. It will also be responsible for designing and building the substation and the OHTL.	High
European Bank for Reconstruction and Development (EBRD)		▪ Project financier, and will be responsible for the monitoring of safeguard compliance; supervision of project, initiate and review Environment, Health, Safety, and social (EHSS) documentation and provide clearance to contract awards and signing / initiation of civil works to the Project	High
National Authorities	Ministry of Labour (MoL)	▪ Regulatory role in the project and responsible for monitoring the employers' compliance with the Labour Law.	Low to Medium
	Directorate of Civil Defence	▪ Involved in approving technical designs and drawings and providing emergency services during the project implementation.	Medium to High
	Ministry of Health (MoH)	▪ Regulatory role in the project includes issues related to the public health of the nearby communities	Low to Medium
	Ministry of Environment (MoEnv)	▪ Regulatory role in the project, and responsible for the approval of the ESIA Study and making sure it complies with the "Environmental Classification and Licensing Regulation No. 69 of 2020 and its amended Regulation No. 97 of 2020". It will also be responsible for granting the environmental clearance for the Project, as well as ensuring implementation of environmental protection measures related to the Project	High
	Ministry of Finance (MoF)	▪ Regulatory role in the project specifically includes Law No. 13 of 2019 which allows for land acquisition	Low
	Ministry of Agriculture (MoA)	▪ Regulatory role in the project includes land use issues related to grazing reserves and forest lands as well as potential impacts related to biodiversity.	Low
	Department of Antiquities (DoA)	▪ Regulatory role in the project includes issues related to archaeology and cultural heritage related to the Project.	Low to Medium
	Ministry of Local Administration (MoLA)	▪ Will be involved in changing designation of land use for the Project, if required.	Low to Medium
	Ministry of Public Works and Housing (MPWH)	▪ Will be involved in ensuring transportation activities are properly managed.	Low to Medium
	Jordan Engineers Association (JEA)	▪ Involved in reviewing technical drawings and granting construction permit for the Project	Medium
	Jordan Contractors Association (JCA)	▪ Involved in registering contractors to the Project and providing them with vocational licenses to work.	Medium
	Municipalities	▪ Responsible for providing infrastructure and utility services	Medium to High
	Jordan Standards and Metrology Organisation (JSMO)	▪ Regulatory role in the project includes issues related to ambient air quality.	Low to Medium

Stakeholder	Description	Influence Degree		
Non-Government Organisations (NGOs) Community Based Organisations (CBOs)	<ul style="list-style-type: none"> Active within the Project area 	Low to Medium		
Affected Parties				
Private Landowners and land users	<ul style="list-style-type: none"> This includes private owners of the land and land users where the substation will be constructed as well as owners of the lands through which the OHTL will pass. 	High		
Local Communities	<ul style="list-style-type: none"> This includes nearby residents, vulnerable groups (persons with disability, elderly people, youth, and local women), local businesses, and Community based Organisations (CBOs). <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Local communities for the Substation: <ul style="list-style-type: none"> Al-Mafraq Governorate Mafraq Qasabah district Rihab Locality (in which the proposed North Substation is located) Greater Mafraq Municipality (GMM) Bani Obeid Municipality Tamirah Farm Al Khanasri Key Receptors Within 1 Km of the Selected Project Site <ul style="list-style-type: none"> Receptor 1 (Chicken Broiler Houses) Receptor 2 (private house/farm that includes a private well) Receptor 3 (Chicken Broiler Houses) Receptor 4 (Private house/farm) Receptor 5 (Private house/farm) Receptor 6 (Structure remains) </td> <td style="width: 50%; vertical-align: top;"> Local communities for the OHTL: <ul style="list-style-type: none"> Zarqa Governorate Al-Mafraq Governorate Beerein Municipality Rihab Municipality Alnaseem Municipality Bani Obeid Municipality Albasiliyah Municipality The OHTL passes close to the following communities <ul style="list-style-type: none"> Hamnanah Khreisan Alshareefah Humeid Alqasabah Hamamah Um Kharroobah Digmisseh Khirbet Almatwa Aldjeineyeh Tamirah Farm Al Khanasri Deir Waraa Buweidah </td> </tr> </table>	Local communities for the Substation: <ul style="list-style-type: none"> Al-Mafraq Governorate Mafraq Qasabah district Rihab Locality (in which the proposed North Substation is located) Greater Mafraq Municipality (GMM) Bani Obeid Municipality Tamirah Farm Al Khanasri Key Receptors Within 1 Km of the Selected Project Site <ul style="list-style-type: none"> Receptor 1 (Chicken Broiler Houses) Receptor 2 (private house/farm that includes a private well) Receptor 3 (Chicken Broiler Houses) Receptor 4 (Private house/farm) Receptor 5 (Private house/farm) Receptor 6 (Structure remains) 	Local communities for the OHTL: <ul style="list-style-type: none"> Zarqa Governorate Al-Mafraq Governorate Beerein Municipality Rihab Municipality Alnaseem Municipality Bani Obeid Municipality Albasiliyah Municipality The OHTL passes close to the following communities <ul style="list-style-type: none"> Hamnanah Khreisan Alshareefah Humeid Alqasabah Hamamah Um Kharroobah Digmisseh Khirbet Almatwa Aldjeineyeh Tamirah Farm Al Khanasri Deir Waraa Buweidah 	Medium to Low
Local communities for the Substation: <ul style="list-style-type: none"> Al-Mafraq Governorate Mafraq Qasabah district Rihab Locality (in which the proposed North Substation is located) Greater Mafraq Municipality (GMM) Bani Obeid Municipality Tamirah Farm Al Khanasri Key Receptors Within 1 Km of the Selected Project Site <ul style="list-style-type: none"> Receptor 1 (Chicken Broiler Houses) Receptor 2 (private house/farm that includes a private well) Receptor 3 (Chicken Broiler Houses) Receptor 4 (Private house/farm) Receptor 5 (Private house/farm) Receptor 6 (Structure remains) 	Local communities for the OHTL: <ul style="list-style-type: none"> Zarqa Governorate Al-Mafraq Governorate Beerein Municipality Rihab Municipality Alnaseem Municipality Bani Obeid Municipality Albasiliyah Municipality The OHTL passes close to the following communities <ul style="list-style-type: none"> Hamnanah Khreisan Alshareefah Humeid Alqasabah Hamamah Um Kharroobah Digmisseh Khirbet Almatwa Aldjeineyeh Tamirah Farm Al Khanasri Deir Waraa Buweidah 			
Project Affected Person (PAPs)	<ul style="list-style-type: none"> Mainly include landowners, land users, farmers, building owners, and informal users across the OHTL route. 	High		
Local Herders and Grazers	<ul style="list-style-type: none"> Those who engage in grazing activities and might be present at or near the proposed sites during certain periods of the year. 	High		
Private Suppliers	<ul style="list-style-type: none"> Suppliers for the site needs (i.e., food, construction materials, etc.) 	Low to Medium		
Contractors and Subcontractors	<ul style="list-style-type: none"> Those who will be engaged in the construction activities during the implementation of the project 	Low to Medium		
Employees/workers	<ul style="list-style-type: none"> workers involved in the Project's operational and construction activities 	High		

5.2 Vulnerable Groups

Vulnerable groups are groups that due to their socio-economic characteristics may experience impacts more severely and/or disproportionately compared to the rest of the community members.

Vulnerable groups are project specific and depend on a range of issues which must be understood such as project location, socio-economic and demographic context, as well as the nature of the development and type of impacts anticipated. Vulnerable groups may be severely affected by the Project by virtue of their physical disability, social or economic standing, and limited education, lack of employment or access to land. The key vulnerable groups within the context of the Project and their relevance are informal land users.

5.3 Project Affected Person (PAPs)

- In the context of land acquisition and expropriation, Project Affected Persons (PAPs) refer to displaced communities and persons who are entitled to compensation. For this Project they include the following:

- a. Persons whose structures are in part, or in total, affected temporarily or permanently by the Project.
- b. Persons whose residential or commercial premises and/or agricultural land (or other productive land) is in part, or in total, affected (permanently or temporarily) by the Project.
- c. Persons whose formal or informal businesses are affected in part, or in total, (temporarily or permanently) by the Project.
- d. Persons whose employment or hired labour or share-cropping agreement is affected, temporarily or permanently, by the Project.
- e. Persons whose crops (annual and perennial) and/or trees are affected in part, or in total, by the Project.
- f. Persons whose access to community resources or property is affected in part, or in total, by the Project.

PAPs which mainly include private owners of the lands and land users where the substation will be constructed as well as owners and users of the lands through which the OHTL will pass. OHTL construction and operation could entail economic displacement impacts on such PAPs (such as disturbance or agricultural activities, land fragmentation, land access, grazing/livestock activities) and/or physical displacement impacts.

As part of the ESIA disclosure package, the ESIA Team will prepare a RF for the Project. A land acquisition audit report for the substation land will also be prepared. At a later point, a detailed RP will be prepared for the Project which will entail detailed mapping and profiling of PAPs as well as consultation.

6. STAKEHOLDER CONSULTATION AND ENGAGEMENT TO DATE

The ESIA Team conducted visits to the Project area in June and July 2024, including the receptors around the Project area and carried out stakeholder engagement activities with key with affected groups and interested parties marked in yellow pins in Figure 11. Results shown in Table 4.

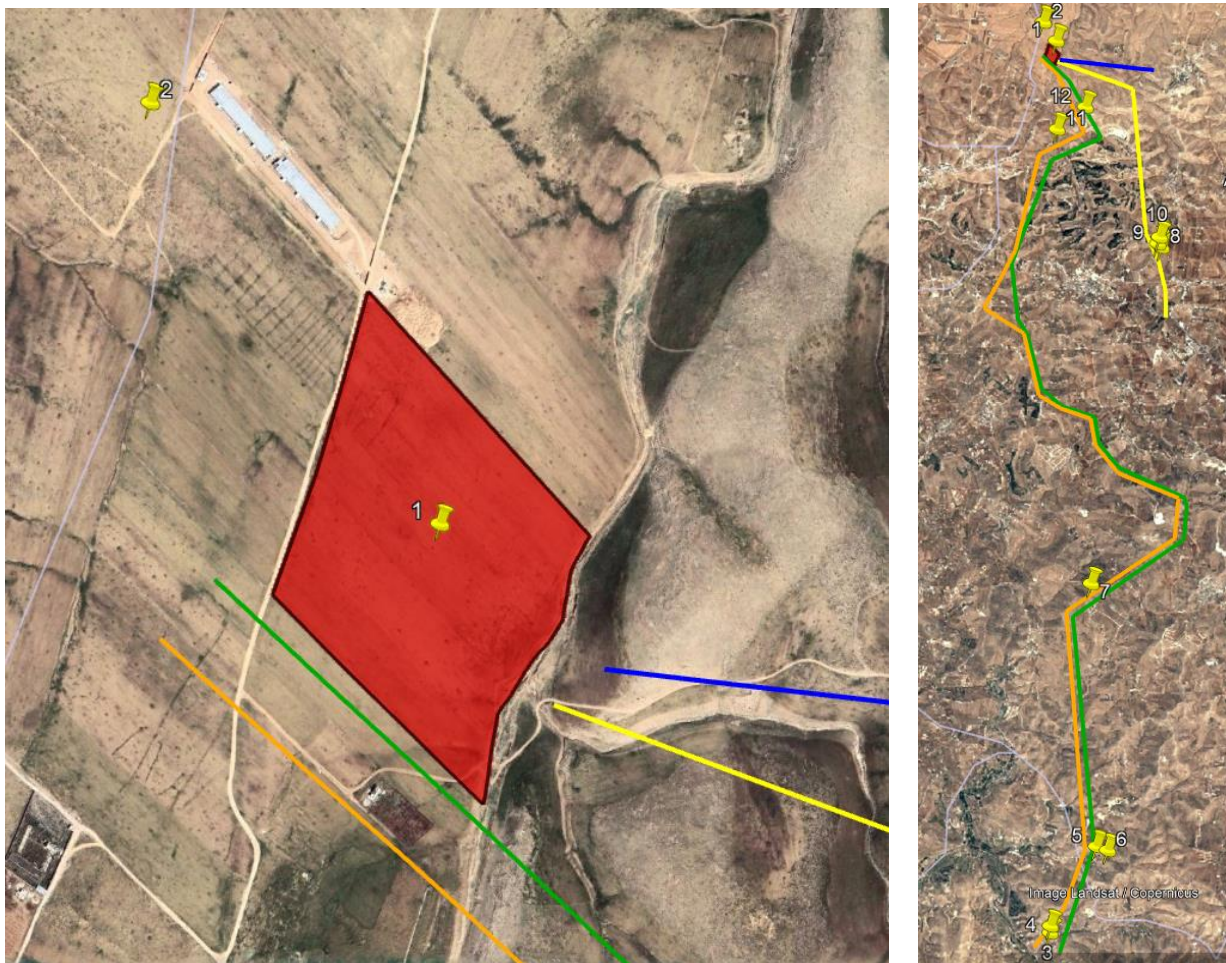








Figure 11: Stakeholders Consulted in the Vicinity of the Project Area




Table 4: Overall Summary of Consultations



#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
1.	Substation	10m North of the substation site	<ul style="list-style-type: none"> ▪ During the site visit, the ESIA team observed a temporary accommodation located to the north of the substation land, situated in front of the broiler house as shown in Figure 13. The team approached the house and spoke to the occupants, who identified themselves as workers from the broiler house and explained that this was their place of residence. They mentioned that there are three (3) other similar residences in the area. Additionally, they informed the team about some Bedouins living in tents approximately 1 km north of this residence. ▪ The ESIA team then proceeded to visit the broiler house located in the northern part of the substation site. There, they spoke to the Project Manager who oversees the construction of the broiler house. He informed the team that the construction phase has been ongoing for almost a year and is expected to be completed within a month, after which a new team will take over for operations. ▪ The Project Manager also shared that they own four other broiler houses situated to the west of the project site and have recently purchased adjacent land to expand by building additional broiler houses. They noted that constructing a broiler house typically takes around a year. Furthermore, he mentioned that the land to the north of their newly acquired property is a farm with a water well, privately owned by an individual who utilises it for agricultural purposes, as shown in Figure 13. ▪ Based on discussions, the Project Manager also indicated that the area in general, including the substation land, had been planted with Barley. The barley has still not been cultivated when the ESIA Team visited the site. Typically, seeding occurs in October-November and harvesting in July. ▪ The Project Manager provided contact details for a landowner in the general area to be contacted. 	 <p data-bbox="1529 639 2074 691">Figure 12: Temporary Accommodation Photo from the Site Visit</p>  <p data-bbox="1529 995 2074 1045">Figure 13: Receptors Around Tamirah Land that include Broiler Houses and Private House/Farm</p>



#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
1.	Substation	The substation site	<ul style="list-style-type: none"> ▪ The ESIA team visited the proposed substation site. The team encountered a herder and proceeded to approach him. The herder provided the team with the contact number for one of the landowners, who was then contacted by the team. ▪ The landowner informed the team that the proposed substation site is situated on their private land owned by their family (10 members). ▪ The landowner informed the team that he works in the military, while many of the landowners are retired, with their source of income being their pension. ▪ According to the landowner, wheat and barley are cultivated on the land, which spans approximately 125 dunums. Production varies depending on the season's rainfall; in good years, about one sack of wheat or barley is produced per dunum, roughly 80 kg per dunum. The harvested grains are stored and used as fodder for the sheep. ▪ Seeding occurs in November, with harvesting typically taking place in May or June. However, this season (June 2024), there was no actual production, so what was seen during the site visit on July 4 was only dry grass. Irrigation relies solely on rainfall. ▪ A tractor is rented for ploughing, and all fieldwork during seeding and harvesting is conducted by family members, including offspring and grandchildren, without hiring outside workers. ▪ Regarding the new substation project on the land, parcel no.19,21 and 22 are owned by the same landowner and their relatives. The landowner was informed by a lawyer about NEPCO's acquisition. The lawyer mentioned that they would take their case to court to seek fair compensation. Without the lawyer, the landowner and their family would not have known about the acquisition, despite an announcement in the newspapers. ▪ NEPCO has offered compensation of 5,000 JD per dunum, which is equivalent to 5 JD per square meter. ▪ The team is attempting to contact the landowner to obtain further information regarding the following, aspects. However, even with the multiple attempts to contact the owner, they did not respond. <ul style="list-style-type: none"> - Contact information for other lawyers and landowners - Ownership details of the sheep - Production and harvesting information from the past ten years - Awareness of the current land use (harvesting) among other landowners - Date of initial harvesting - Grazing habits of the sheep during non-harvesting periods 	 <p style="text-align: center;">Figure 14: Substation Site</p>


#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
2.	Substation	Approximately 350m west of the Substation site	<ul style="list-style-type: none"> The ESIA Team requested contact information for the landowners from (stakeholder No. 1 above), who provided the details of, the owner of parcel number 31 (delineated on Figure 15) near the proposed substation site, though not part of it. On July 2, 2024, the ESIA Team contacted the landowner, who stated that unknown individuals (informal land users), possibly nomads, have been cultivating and harvesting barley, wheat, and other grains on his land (No. 31) without their permission or any formal agreement. When asked if they had contact details for neighbouring landowners or the informal land users, the landowner indicated that he did not possess such information. 	<p>Figure 15: Location of Land Plot No. 31 in Relation to the Substation Site</p>
3.	OHTL	250m east of the proposed 400kV (North S/S – West Amman) line and approximately 410m west of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> The ESIA Team observed an active construction site. The team approached the construction workers who directed the ESIA team to the landowner, a real estate developer. The landowner informed the team that the site is to be developed into a recreational facility consisting of a horseback riding centre with stables and a restaurant/café. The landowner informed the team that they also own a few blocks of land around the construction site, which they acquired 4-5 years ago. The existing OHTL lines were already in place then. The landowner exhibited general awareness of the potential health consequences of residing near an OHTL. they also expressed concerns regarding the value of their land falling because of the proposed additional OHTLs the team mentioned. In the case of the proposed OHTL lying over their land, they are open to negotiations and possible compensation proposals. 	<p>Figure 16: The Landowner's Construction Site</p>

#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
4.	OHTL	145m east of the proposed 400kV (North S/S – West Amman) line and approximately 460m west of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> ▪ The ESIA team observed an enclosed land area consisting of a farmhouse which falls in proximity to the proposed OHTL. The ESIA team approached one of the occupants, who identified themselves as the landowner. They mentioned that this is their place of residence and that on their land, they raise chickens and bees. Additionally, they have olive and palm trees. The products are for household use only, they mentioned that they are not considering selling or entering the market in the near future. They also mentioned that their main source of income is their pension. ▪ Their land lies next to existing OHTL, which the landowner expressed dissatisfaction about. They believe that they will be negatively impacted by the proposed OHTL project as they noticed that the bees on their farm are affected by the electromagnetic field generated and have reduced their pollination by half since the existing OHTL was energised. Furthermore, the landowner mentioned that the chickens hatched 50% less eggs than usual in the last year which they believe to be the year of operation of the existing OHTL. ▪ The landowner informed the team that their house is grid connected but autonomous in terms of water supply, as they have tanks that are regularly filled up and have sufficient capacity for water storage for times of shortage. ▪ The landowner informed the ESIA team that they will not accept any sort of financial compensation if the project were to take place and would object through court. The landowner did not express any positive thoughts regarding the proposed OHTL, even though they stated suffers from electrical shortages regularly. 	 <p data-bbox="1637 639 1966 663">Figure 17: Stakeholder no.4 Land</p>  <p data-bbox="1630 1018 1973 1042">Figure 18: Stakeholder no.4 House</p>
5.	OHTL	75m east of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> ▪ The team observed a construction site that falls within the vicinity of the proposed OHTL, with 3 personnel on site. One of them is the sibling of the landowner and the other two are workers. They informed the team that they are building a residential house/chalet for a total of 4 people. They mentioned that the land area is approximately 3 dunums and 400m2. They also informed the team that their sibling acquired the land 2 years ago and is unaware of electrical shortages in the area. They expressed general awareness of the possible health consequences of high voltage electricity/OHTL. ▪ The landowner’s sibling indicated that if the proposed OHTL were to pass directly over their land, they would consider selling it. They noted that while the existing OHTLs are nearby, with a tower in the adjacent land to theirs, none of the existing lines currently pass directly over their land. 	 <p data-bbox="1576 1399 2027 1423">Figure 19: Stakeholder no.6 Construction Site</p>

#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
6.	OHTL	Approximately 400m west of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> The ESIA team observed another construction site within the vicinity of the proposed OHTL. They approached the site and spoke to the landowner, who is building a small house for their family on their 3.5 dunum land, purchased in 2014. The land is currently barren, with no livestock being raised. The landowner’s property is currently being built less than 15 meters away from the existing North Amman-Mafraq OHTL, a precaution recommended by several individuals to mitigate OHTL impacts, according to their statement. Additionally, their property is approximately 400 meters from the proposed OHTL. While the landowner is aware that living near an OHTL can generally pose health risks, they were unable to specify the exact concerns. When asked about any concerns regarding the proposed project 400 meters away, they mentioned that they couldn't be certain of any potential impacts. 	 <p data-bbox="1554 639 2049 667">Figure 20: Stakeholder no.6 Construction Site</p>
7.	OHTL	Under the proposed 400kV (North S/S – West Amman) line and approximately 200m west of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> The ESIA team visited the houses in the area where the proposed OHTL passes directly over them. However, upon arrival, the houses were found to be closed with no occupants present, leading to the suspicion that they might be seasonal or vacation homes rather than permanent residences. 	 <p data-bbox="1671 1023 1933 1050">Figure 21: Locked House 1</p>  <p data-bbox="1671 1401 1933 1428">Figure 22: Locked House 2</p>

#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
8.	OHTL	Directly under the Proposed 132 kV (North S/S – Jerash S/S) line	<ul style="list-style-type: none"> ▪ The ESIA Team observed a property which falls directly under the proposed OHTL. The team was able to attain the phone number of one of the landowners, from the attending guard observed there. The landowner informed the team that him and their spouse jointly own 8.25 dunums of land, which includes a 75m² house. Although they do not currently reside there, they plan to make it their permanent residence in the future. ▪ Currently, a guard is employed to maintain the property. The land is cultivated with approximately 400 relatively young olive, pistachio, fig, peach, and other fruit trees. Additionally, the landowner raises chickens and pigeons. They mentioned that the current production from the trees is for personal consumption, however, they may consider selling some of the yield in the future. ▪ The landowner expressed concerns about potential health risks associated with the OHTL project. However, they are not aware of any additional impacts that the OHTL might have on their property. 	 <p style="text-align: center;">Figure 23: Stakeholder no.8 Farm</p>
9.	OHTL	Approximately 30m west of the proposed 132 kV (North S/S – Jerash S/S) line	<ul style="list-style-type: none"> ▪ The ESIA team observed a property situated in the vicinity of the proposed OHTL. The team proceeded to ring the doorbell and request contact with the owner. The owner was very cooperative. They informed the team that the total size of their property is 6 dunums including a house and two pools, totalling approximately 200-250 m² in size. The rest of their land is used for cultivation, featuring olive trees, fig trees, apple trees, and other plants. Additionally, they mentioned that they engage in beekeeping and maintains around 120 sheep, which they sell during Eid al- Adha. The sheep are kept on his land as well. The landowner is a retired biologist, and now works as a car dealer. The landowner mentioned that they purchased the land in 2016. At the time, there were only a few trees. The solely built their residence, installed the pools, and expanded cultivation with additional trees. Their property serves as the permanent residence for their family of six members. ▪ The landowner expressed concerns regarding the proposed OHTL project. These include potential health risks associated with electromagnetic fields, as well as concerns about noise and visual disturbances. They are also concerned about the potential depreciation of their property value once the project is established. To address these concerns, the landowner proposed that the OHTL should be located no less than 250m away from their property, although they did emphasise their opposition to the project being implemented in this area. ▪ In terms of infrastructure, the landowner’s property is independent in terms of water supply, where they purchase their own water, since there are no existing water or wastewater networks in the area. 	 <p style="text-align: center;">Figure 24: Stakeholder no. 9 Property within the Vicinity of the OHTL</p>

#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
10.	OHTL	Approximately 30m west of the proposed 132 kV (North S/S – Jerash S/S) line	<ul style="list-style-type: none"> ▪ The ESIA team observed a property which falls in the vicinity of the proposed OHTL. The team was able to get in contact with the property owner through their phone number, which the team obtained from their neighbour. ▪ The landowner informed the team that they are a retired police officer currently working at a private company. They also mentioned that they own a 4.5 dunum property with a 120 m2 house. The majority of their land is dedicated to cultivation, hosting approximately 150 olive trees, fig trees, and pomegranate trees. The produce from these trees is for personal use and not sold. They purchased the land in 2018 and constructed the house afterward. ▪ The landowner informed the team that they currently live in Amman and is in the process of preparing their 120 m2 house as their permanent residence, where they plan to move with their family. They expressed significant concerns about the proposed OHTL project in their area. Their neighbour informed them about the project after being contacted by the ESIA team. ▪ The landowner expressed concerns regarding the OHTL project which include potential health issues from electromagnetic fields, noise pollution, and visual disturbance. They are also concerned about the potential depreciation of their property value once the project is established, as the area is frequently used for recreation by many people during spring. They strongly believe the OHTL project should be relocated elsewhere, suggesting it be situated at least 300-500 m away from their property. ▪ In terms of infrastructure, the landowner informed the ESIA team that their property is independent in terms of water supply, they purchase their own water due to the lack of existing water or wastewater networks in the area. They also emphasised their opposition to the project being implemented in this area. 	 <p data-bbox="1512 678 2094 726">Figure 25: Stakeholder no.10 Property Within the Vicinity of the OHTL</p>
11.	OHTL	Approximately 100m west of the proposed 400kV (North S/S – West Amman) line and approximately 415m west of the proposed 400kV (North S/S – Samra) line	<ul style="list-style-type: none"> ▪ The ESIA team visited the Gas Station and requested to speak to an engineer. One of the station workers provided them with the contact number of the Head of the Civil Department at Al Manaseer. The Engineer stated that their only request is for the OHTL to maintain a minimum distance of 100 meters from the gas station. They explained that a smaller distance could result in a catastrophe, as any potential sparks from the OHTL could ignite fumes from the underground tanks. Therefore, ensuring 100 meters should effectively mitigate this risk. 	 <p data-bbox="1512 1348 2094 1364">Figure 26: Manaseer Gas Station (Dijaneyeh)</p>

#	Project/Area	Distance and direction of receptor in relation to the substation/OHTL	Summary of Results	Supporting Photos
12.	OHTL	Directly under the Proposed 400kV (North S/S – West Amman) line and approximately 115m west of the proposed 400kV (North S/S – Samra) OHTL	<ul style="list-style-type: none"> The ESIA team observed a man in the quarry area, who identified himself as a worker and provided the team with the number of an individual, who works at the site and lives nearby. The worker, informed the team that they tend to divide their time between two locations, spending a few days each week at each place. One location is a rented property at the quarry, where they work as a guard and an operations supervisor for one of the machines. Additionally, they raise around 200 sheep at the quarry, which are owned by their father. The other location is a property owned by their father, accommodating around 17 family members and housing between 300 to 500 sheep. This property spans 350m² and is located approximately 50m from the quarry. The worker expressed their main concerns regarding the OHTL project, specifically potential health risks and the depreciation of their father's property where their family reside 	 <p>Figure 27: Machinery at the Quarry Site</p>

In addition, The ESIA team visited several municipalities where the project is located or in close proximity to in July 2024, listed in the table below.

Table 5: Municipalities Visited by the ESIA Team

No.	Municipality	Position
1.	Birein	Head of Development Unit
2.	Balaama	Head of Development Unit / Municipal Administrative Director
		Engineer at the Tendering Department
3.	Al-Hashimeyeh	Executive Director of the Municipality
		Head of Development Unit
4.	Rihab	Municipal Director
5.	Al Naseem	Head of Regulatory Areas
		Survey Engineer for Qafqafa Area
		Director of Qafqafa Area
		Director of Al Rabwa Area
6.	Bani Obaid	Secretary of the Mayor's Office
7.	Basliah	Executive Director of the Municipality

The team briefed the designated contacts at the municipalities about the project, detailing the substation location and the proposed OHTL route. Additionally, they provided information on the project's objectives and requested socio-economic and environmental data from the municipalities to include in the ESIA report.

7. FUTURE STAKEHOLDER ENGAGEMENT STRATEGY

A stakeholder engagement action plan has been developed as shown in Table 6. Engagement is an ongoing process that is integrated into the project lifecycle to ensure that issues that may have an impact on the local community are taken into consideration from the design until closure.

NEPCO will assign EPC Contractors through an open tendering process to undertake the design, procurement, and construction of the Substation and OHTL. Accordingly, NEPCO HSE Department will have a focal point throughout the project lifecycle that acts as a Stakeholder Engagement Officer to ensure that the SEP is implemented adequately by the Contractors.

Any consultants which could be assigned to assist the Officer in implementing the SEP (E&S ESAP Implementation Consultant (IC) to be assigned by EBRD to work with NEPCO over a 24-month period to implement the E&S requirements of the EBRD and the ESAP measures. This contract will be financed by EBRD), and to communicate with stakeholders when needed during the planning and construction phase. Also, this officer will be responsible to implement the SEP during the operation phase of the substation and OHTL.

Each of the Substation and OHTL Contractors will assign a Community Liaison Officer (CLO). The CLO does not need to be a full-time employee. He/she can be a part time employee or have another intersecting role such as HSE Coordinator / Engineer.

The community liaison activities pertaining to this project are expected to include managing the planned stakeholder engagement activities in addition to recording and documenting any consultation session that takes place relating to the project, if applicable. Furthermore, the CLO assigned by the EPC Contractor for the construction of the substation and the CLO assigned by the EPC Contractor for the construction of the OHTL must manage and document grievances as appropriate based on the grievance mechanism proposed in this document.

NEPCO supported by the IC will be responsible for undertaking the stakeholder engagement and information disclosure activities during the planning phase. During the construction phase, engagement activities will be undertaken by the EPC Contractors. NEPCO shall distribute relevant documentation to the EPC Contractors and stakeholders involved in their regulatory role of this project. NEPCO shall also ensure that the EPC Contractors appoint a CLO who will be responsible to implement the SEP on aspects relevant to the construction phase, as well as managing the implementation of the project grievance mechanism.

Moreover, NEPCO Project Manager and the project managers of the EPC Contractors shall incorporate summaries of grievance reporting into monthly and quarterly reports to EBRD in addition to copies of the grievance log.

During the operation phase, NEPCO shall continue implementing stakeholder engagement and managing grievances.

- For PR5-Land Acquisition, Involuntary Resettlement and Economic Displacement, NEPCO shall:
 - NEPCO will ensure that the owners and users of the lands acquired for the substation receive fair compensation.
 - NEPCO to undertake consultation activities with the owners and users of the properties where the OHTL might pass through, to inform them about the new OHTL, its route, the exact locations of the towers, construction schedule and grievance mechanism.
 - NEPCO to ensure all related stakeholders in relation to the OHTL are identified and consulted with and ensure rights and compensation values are sufficiently documented in case of resettlement.
 - NEPCO to appoint qualified consultant to develop and implement the Resettlement Plan with increased consultation and information disclosure, and to monitor the compensation process to verify it meets the requirements of the Resettlement Plan.

- The Resettlement Plan will also identify any vulnerable individuals and groups who will need additional mitigation and consultation measures.
- Develop and implement a grievance redress mechanism.
- Appoint a person to be the primary point of contact within NEPCO regarding the resettlement and compensation program.
- At completion of resettlement and compensation, NEPCO to audit the completed program.

An updated SEP will be submitted at the end of the planning phase. The SEP should also be regularly updated during the operation phase as necessary.

Table 6: Stakeholder Engagement Strategy and Plan

Stakeholder	Objectives	Communication Methods and Tools	Phase	Timeframe	Responsibility
Affected Stakeholders					
Landowners of the selected land for the Substation	<ul style="list-style-type: none"> Disclosure of Project information to the landowners and users, to include project activities and timeline. Ensure that affected landowners and users received fair compensation 	<ul style="list-style-type: none"> Focus Group Discussions. Face-to-Face Interviews. Consultation Session Consultative Forums such as resettlement committees or working groups 	<ul style="list-style-type: none"> During the Planning and Design Phase. 	Q 4 2024 – Q2 2026	NEPCO and EPC Contractors
Owners of lands through which the OHTL might pass	<ul style="list-style-type: none"> Disclosure of Project information to the landowners and coordination for the resettlement and compensation process (if required) 	<ul style="list-style-type: none"> Focus Group Discussions. Face-to-Face Interviews. Project Summaries, Maps, Schedules and other documents as required. 	<ul style="list-style-type: none"> During the Planning and Design Phase. PR5 timeframes for notifying Project Affected Persons (PAPs) should be adhered to. 	Q 4 2024 – Q2 2026	NEPCO and EPC Contractors
	<ul style="list-style-type: none"> When undertaking design works such as micro-siting of the pylon bases, the landowner/user/occupier should be consulted to get input on optimal siting from their point of view 	<ul style="list-style-type: none"> Focus Group Discussions. Face-to-Face Interviews. Project Summaries, Maps, Schedules and other documents as required. 	<ul style="list-style-type: none"> Prior to any construction works and as part of design of the works 	Q 4 2024 – Q2 2026	NEPCO
	<ul style="list-style-type: none"> Conduct engagements with landowners, land users or occupiers of land that may be impacted by the construction and operation phase of the project works. This should be to both inform as well as consult. 	<ul style="list-style-type: none"> Focus Group Discussions. Face-to-Face Interviews. Project Summaries, Maps, Schedules and other documents as required. 	<ul style="list-style-type: none"> Prior to and during construction 	Q1 and Q2 2026 June 2026 – June 2028	NEPCO
	<ul style="list-style-type: none"> Conduct consultation with landowners explaining the land valuation and land acquisition process for the OHTL and negotiations with landowners, including the timing of the compensation 	<ul style="list-style-type: none"> Focus Group Discussions. Face-to-Face Interviews. Project Summaries, Maps, Schedules and other documents as required. 	<ul style="list-style-type: none"> Prior to construction 	Q 4 2024 – Q2 2026	NEPCO
<ul style="list-style-type: none"> Local communities to include: <ul style="list-style-type: none"> Nearby residents Community Based Organisations Vulnerable groups Local businesses Local Grazers 	<ul style="list-style-type: none"> Disclose information and outcomes of the Labour Employment Plan. 	<ul style="list-style-type: none"> Consultation Session. 	<ul style="list-style-type: none"> Once before construction. Once before operation. 	Q 4 2024 – Q2 2026 Q1/Q2 2028	EPC Contractors
	<ul style="list-style-type: none"> Inform the local communities about job opportunities for the Project. 	<ul style="list-style-type: none"> Social media and Online Platforms (to be identified on a later stage). Posters to be placed at key local community platforms to include Local District Office, Municipality, CBO's, etc. 	<ul style="list-style-type: none"> Once before construction. 	Q 4 2024 – Q2 2026	EPC Contractors
	<ul style="list-style-type: none"> Disclosure of Project information and grievance mechanism to local community grazers 	<ul style="list-style-type: none"> Face-to-Face Interviews. 	<ul style="list-style-type: none"> Once before construction. 	Q 4 2024 – Q2 2026	EPC Contractors

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Stakeholder	Objectives	Communication Methods and Tools	Phase	Timeframe	Responsibility
	<ul style="list-style-type: none"> Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism. 	<ul style="list-style-type: none"> SEP in Arabic to be disclosed on NEPCO website 	<ul style="list-style-type: none"> Once before construction With ESIA disclosure package (Updated when required) 	Q 4 2024 – Q2 2026	NEPCO
		<ul style="list-style-type: none"> Hardcopy of SEP in Arabic to be available at Local District Office and Local Municipality. 	<ul style="list-style-type: none"> Once before construction 	Q 4 2024 – Q2 2026	NEPCO
	<ul style="list-style-type: none"> Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, etc.) 	<ul style="list-style-type: none"> Summary advertisement in Arabic of grievance mechanism to be posted at key local community platforms to include Local District Office, Local Municipality, CBO's, etc. 	<ul style="list-style-type: none"> Semi-annually during construction and annually during operation. 	Q 4 2024 – Q2 2026	NEPCO and EPC Contractors
		<ul style="list-style-type: none"> Leaflets with updates on project and its environmental and social issues to be disclosed at key local community platforms to include Local District Offices, Local Municipalities, CBO's, etc. This could include updates on the project development, number of employment opportunities, the bidding process for project components, construction plans, etc. 			
Private Suppliers	<ul style="list-style-type: none"> Coordination for providing needs for the project (i.e., food, construction materials, etc.) 	<ul style="list-style-type: none"> Advertisements in local newspapers. Social media and Online Platforms (to be identified on a later stage). 	<ul style="list-style-type: none"> During the bidding process. During the construction phase. 	Q2/Q3 2025 June 2026 – June 2028	EPC Contractors
Contractors and Subcontractors	<ul style="list-style-type: none"> Coordination for engagement in the construction activities during the implementation of the Project. 	<ul style="list-style-type: none"> Advertisements in local newspapers and NEPCO website. 	<ul style="list-style-type: none"> During the bidding process. 	Q2/Q3 2025	NEPCO
Employees / Workers	<ul style="list-style-type: none"> Disclosure of Project information 	<ul style="list-style-type: none"> Awareness and training sessions shall be held for the employees/workers to inform them about the project risks and grievance mechanism. 	<ul style="list-style-type: none"> During construction 	June 2026 – June 2028	EPC Contractors
Interested Stakeholders					
EBRD	<ul style="list-style-type: none"> Updates on the Project including environmental and social issues (e.g., environmental performance, grievance mechanism implementation, etc.) 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) 	<ul style="list-style-type: none"> When needed 	Q1 2025 – till pay back of loan	NEPCO
		<ul style="list-style-type: none"> Submission of annual environmental and social report 	<ul style="list-style-type: none"> Annually 		NEPCO
Civil Society Organisations (CSOs)/Non-government Organisations	<ul style="list-style-type: none"> Disclosure of project information, updates of the project and obtain feedback and comments on the Project and the ESIA 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) 	<ul style="list-style-type: none"> During ESIA update Before construction Before operation When needed 	Q4 2025 – Q2 2026 Q 4 2024 – Q2 2026 Q1/Q2 2028	NEPCO
		<ul style="list-style-type: none"> Correspondence and official letters. 			

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Stakeholder	Objectives	Communication Methods and Tools	Phase	Timeframe	Responsibility	
Local Authorities:	<ul style="list-style-type: none"> - Ministry of Labour (MoL) - Directorate of Civil Defence - Ministry of Health (MoH) - Ministry of Finance (MoF) - Ministry of Agriculture (MoA) - Department of Antiquities (DoA) - Ministry of Local Administration (MoLA) - Ministry of Public Works and Housing (MPWH) - Jordan Contractors Association (JCA) - Ministry of Environment (MoEnv) - Municipalities 	<ul style="list-style-type: none"> ▪ Some governmental stakeholders might require undertaking certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the project 	<ul style="list-style-type: none"> ▪ Individual/Internal Meetings (if required) ▪ Correspondence and official letters. 	<ul style="list-style-type: none"> ▪ When needed 	Q4 2024 – Decommissioning if any	NEPCO and EPC Contractors
	- Ministry of Environment (MoEnv)	<ul style="list-style-type: none"> ▪ Might require undertaking certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the project 	<ul style="list-style-type: none"> ▪ Individual/Internal Meetings (if required) 	<ul style="list-style-type: none"> ▪ When needed 	Q4 2024 – Decommissioning if any	NEPCO and EPC Contractors
			<ul style="list-style-type: none"> ▪ Correspondence and official letters (if required) 	<ul style="list-style-type: none"> ▪ When needed 		NEPCO and EPC Contractors
		<ul style="list-style-type: none"> ▪ Coordination for list of private contractors approved for collection of hazardous waste from the site to the Swaqa Hazardous Waste Treatment Facility. 	<ul style="list-style-type: none"> ▪ Correspondence and Official Letters 	<ul style="list-style-type: none"> ▪ Once before construction ▪ Once before operation 	Q 4 2024 – Q2 2026 Q1/Q2 2028	NEPCO and EPC Contractors
	- Municipalities	<ul style="list-style-type: none"> ▪ Coordination for disposal of any hazardous waste to the Swaqa Hazardous Waste Treatment Facility. 	<ul style="list-style-type: none"> ▪ Individual/Internal Meetings (if required) ▪ Correspondence and Official Letters 	<ul style="list-style-type: none"> ▪ When needed during construction and operation 	Q1/Q2 2026 After June 2028	NEPCO and EPC Contractors
<ul style="list-style-type: none"> ▪ Coordination for the collection of solid waste from the site to the municipal approved landfill 		<ul style="list-style-type: none"> ▪ Individual/Internal Meetings (if required) ▪ Correspondence and Official Letters 	<ul style="list-style-type: none"> ▪ Once before construction 	Q 4 2024 – Q2 2026 Q1/Q2 2028	NEPCO and EPC Contractors	

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Stakeholder	Objectives	Communication Methods and Tools	Phase	Timeframe	Responsibility
	<ul style="list-style-type: none"> Disclose information and outcomes of the Labour Employment Plan 	<ul style="list-style-type: none"> Awareness session will be held for the local community to inform them of the Labour Employment Plan. Session to be undertaken in coordination with the local Municipality. 	<ul style="list-style-type: none"> Once before operation 		
- Department of Antiquities (DoA)	<ul style="list-style-type: none"> Reporting and communication in case archaeological remains are found through construction of project along with chance find procedures implemented. 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	<ul style="list-style-type: none"> Upon Occurrence 	Q1/Q2 2026 – June 2028	EPC Contractors
- Ministry of Water and Irrigation (MWI)/ relevant water companies	<ul style="list-style-type: none"> Review the final route of the OHTL and locations of the towers to ensure no interference with existing water and wastewater networks. 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	<ul style="list-style-type: none"> During the Planning and Design Phase. 	Q 4 2024 – Q2 2026	EPC Contractors
	<ul style="list-style-type: none"> Coordination for securing the water requirements for the construction and maintenance activities. 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	<ul style="list-style-type: none"> When needed during construction and operation 	Q1/Q2 2026 After June 2028	NEPCO and EPC Contractors
	<ul style="list-style-type: none"> Coordination for the collection of wastewater from the sites to the designated WWTPs. 	<ul style="list-style-type: none"> Individual/Internal Meetings (if required) Correspondence and Official Letters 	<ul style="list-style-type: none"> When needed during construction and operation 	Q1/Q2 2026 After June 2028	NEPCO and EPC Contractors

8. GRIEVANCE REDRESS MECHANISM (GRM)

8.1 GRM Procedure during Construction Phase

For the construction phase, the GRM will be implemented at two levels as follows:

- Level 1 GRM: is the first level where the EPC Contractors are responsible to implement, receive, follow-up and report on the received grievances.
- Level 2 GRM: is the second level GRM where stakeholders who believe that their grievance is unresolved or unsatisfactorily addressed by the Contractor, may file a grievance directly to NEPCO.

The functional organisation levels and responsibilities for the grievance management during the project phase is presented in Table 7 below.

Table 7: Functional Organization Level for Management Grievances During the Project

Level	Responsible Entity	Tasks
GRM Level 1	The EPC Contractors	<ul style="list-style-type: none"> ▪ Publicize the GRM procedure, grievance receiving channels for public community and workers. ▪ Implement the Level 1 GRM. ▪ Monthly reporting to NEPCO on received Level 1 GRMs and their status.
GRM Level 2	NEPCO supported by the E&S ESAP Implementation Consultant (IC)	<ul style="list-style-type: none"> ▪ Ensure that the GRM procedure, grievance receiving channels are publicized for public community and workers. ▪ Review the monthly reports by the EPC Contractors on Level 1 GRM. ▪ Implement the Level 2 GRM.

The procedure for Level 1 and Level 2 GRM is illustrated in Figure 28 and its procedure is discussed in the sub-sections below.

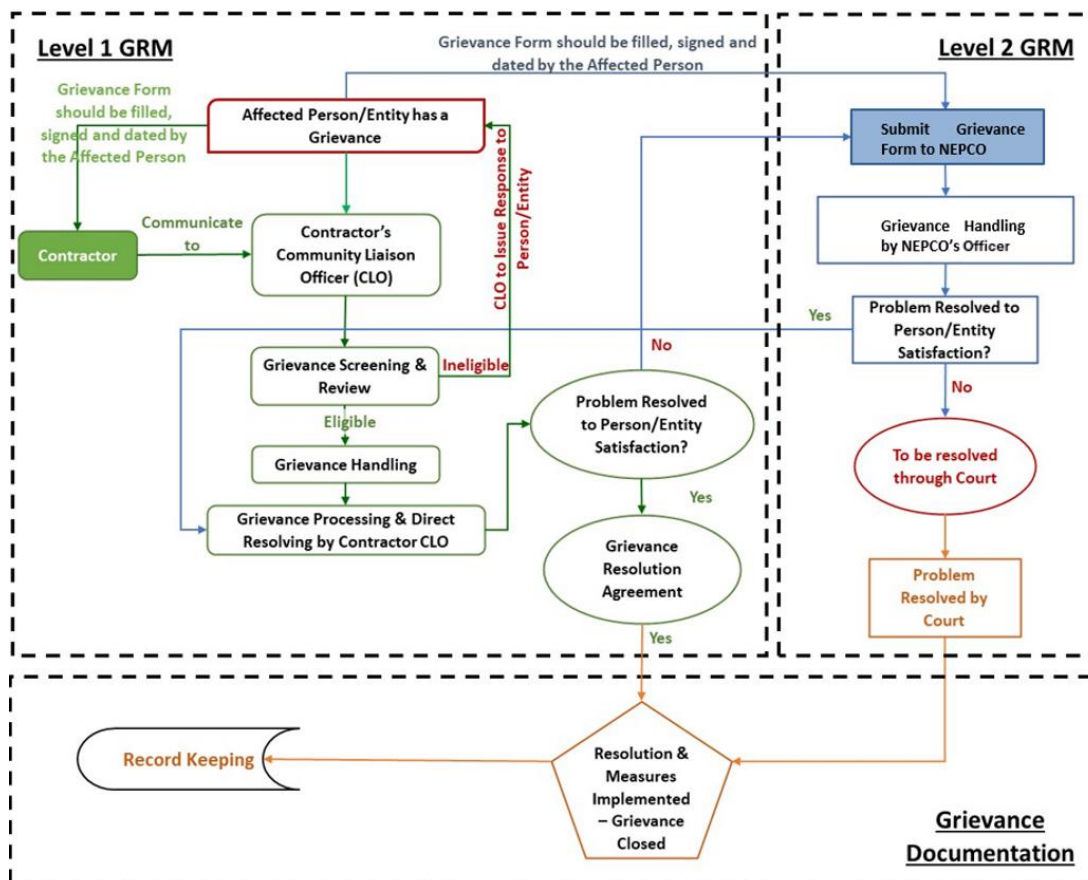


Figure 28. Illustration of the GRM Procedures during the Construction Phase

Each EPC Contractor will have the CLO assigned for publicising the GRM procedure and for receiving the grievances from all stakeholders including community members and workers. The Contractor's assigned CLO will be responsible for receiving any allegations or grievances and must be appropriately trained.

The CLOs will be responsible for logging grievances received into the grievance mechanism log and for taking appropriate actions to resolve the grievances. During the resolution of grievances regular communication with the persons that registered the grievances is needed, and records should be maintained of the dates and details of the actions and communication.

In case the grievance was not resolved to the satisfaction of the complainant, the complainant has the right to file the grievance directly to NEPCO, which will handle the grievance either by resolving it and resending it to the Contractor's CLO for grievance processing and resolving or the complainant will also not be satisfied, in this case the complainant has the right to resort to court.

Clear responsibilities must be assigned for the management of the grievance mechanism, including management of the resolution of grievances and reporting. The Contractors will need to provide reports on grievance resolution within the monthly and quarterly reporting to NEPCO. In cases where the resolution of a grievance is difficult or urgent, the Contractors should, as needed, discuss the resolution options with NEPCO outside the reporting process. The Grievance Mechanism for the construction phase of the project is presented in

Table 8 and the grievance form in Table 9.

Table 8: GRM Procedure

Step	Description of GRM Procedure
Receiving the Grievance	<p>A billboard should be available at each construction site to provide contact information for grievances. In addition, to support this information, a project billboard available at the project site will be made available at all times for those who wish to refer back to the Grievance Mechanism. It should include the contact information for:</p> <ul style="list-style-type: none"> - <u>Filing grievance to the Contractors</u> - <u>Filing grievance to directly to NEPCO</u> <p>Stakeholders, communities and workers can file a grievance through the following:</p> <p><u>Construction Sites:</u> Complaint forms – (copies to be available at each construction site) Contractors' Email: <i>to be determined at a later stage</i> Contractors' Mobile/Phone number: to be determined at a later stage</p> <p><u>NEPCO Premises:</u> Suggestions & Complaints Boxes at the premises of NEPCO NEPCO Hotline: XXXXXX (to be updated by NEPCO) Email: XXXXXXX (to be updated by NEPCO)</p> <p><i>*Individuals/entities have the right to request that their name to be kept confidential.</i></p>
Grievance Screening and Review	<p>The CLOs will investigate the complainant's eligibility for validation purposes. If the claim was rejected for reasons such as being ineligible, has no basis or no action is required, then the CLOs must put together a reasonable response within 5 days explaining the reason for rejection to the complainant with evidence where applicable. In case the complainant did not approve of the screening decision, the complainant can raise the grievance directly to NEPCO as Level 2 GRM.</p>
Grievance Handling, Processing, and Resolution	<p>Once the grievance is investigated and clarified, the CLOs will develop and decide resolution options and prepare a response. Grievances will be acknowledged and verified within 2 working days. A resolution/action will be proposed after complaint is verified, and then responded to within a maximum of 5 working days.</p>
Grievance Resolution Agreement	<p>Complaints/Grievances shall be closed when an agreement is reached with those who filed the grievance. This shall be recorded in the grievance log or database accordingly, along with the closing date, and any other supporting documentation or photos to be stored for future reference.</p>
Escalated Grievance Mediation	<p>If the Complainant is not satisfied with the grievance resolution, he/she may raise the grievance to NEPCO as Level 2 GRM. NEPCO Officer will then review the complaint/grievance where his/her name and contact will be communicated to complainant, if still not satisfied, he/she can revert to court for a resolution.</p>

Table 9: Construction Phase Grievance Form

Community Grievance Form (الشكاوى)	
Reference No (رقم المرجع):	

Please enter your contact information and grievance. This information will be dealt with confidential. الرجاء تزويدنا بمعلومات الاتصال الخاصة بك والشكوى. سيتم التعامل مع هذه المعلومات بسرية	
Full Name الاسم	_____
Anonymous submission إخفاء معلومات مقدم الشكوى	I want to remain anonymous (أرغب بعدم الكشف عن هويتي)
Please mark how you wish to be contacted (mail, telephone, e-mail). يرجى تحديد الطريقة التي تريد أن يتم الاتصال بك بها (هاتف، بريد إلكتروني)	By Telephone (من خلال الهاتف): _____ By E-mail (من خلال البريد الإلكتروني): _____
Description of Incident or Grievance: وصف الشكوى	What happened? Where did it happen? Who did it happen to? What is the result of the problem? ماذا حدث؟ أين حدث هذا؟ من فعل ذلك؟ ما هي نتيجة المشكلة
Date of Incident/Grievance: تاريخ الشكوى	One time incident/grievance (Date _____) موضوع الشكوى حدث لمرة واحدة فقط (Date _____) Happened more than once (how many times? مرة أكثر من مرة) (_____) موضوع الشكوى مستمر (On-going (currently experiencing problem)) ما هو برأيك مقترحك لحل المشكلة?
What would you like to see happen to resolve the problem? ما هو برأيك مقترحك لحل المشكلة?	

8.2 GRM during Operation Phase

NEPCO will handle two different types of workplace complaints during the operation phase to include:

- Grievances relevant to NEPCO staff.
- Grievances relevant to local communities and other affected stakeholders.

If NEPCO receives complaints from employees, NEPCO will address these grievances following the operational phase GRM procedure detailed below:

- When a concern or action has happened, the employee/worker must submit a written grievance to the Direct Supervisor (DS) within five working days.
- The Direct Supervisor must respond within five business days. If the employee/worker is not satisfied with the supervisor's response, he/she might take the grievance to the Human Resources (HR) Department.
- The HR department must respond within five business days. If the employee/worker is not satisfied with the response and wishes to appeal, he/she may do so within five business days of receiving the HR's response.
- If an employee is dissatisfied with the ultimate outcome of the internal grievance system, he or she may still engage an attorney and take the matter to the court.

The GRM procedure for workers during the operation phase is illustrated in Figure 29 and the grievance form is illustrated in Table 10.

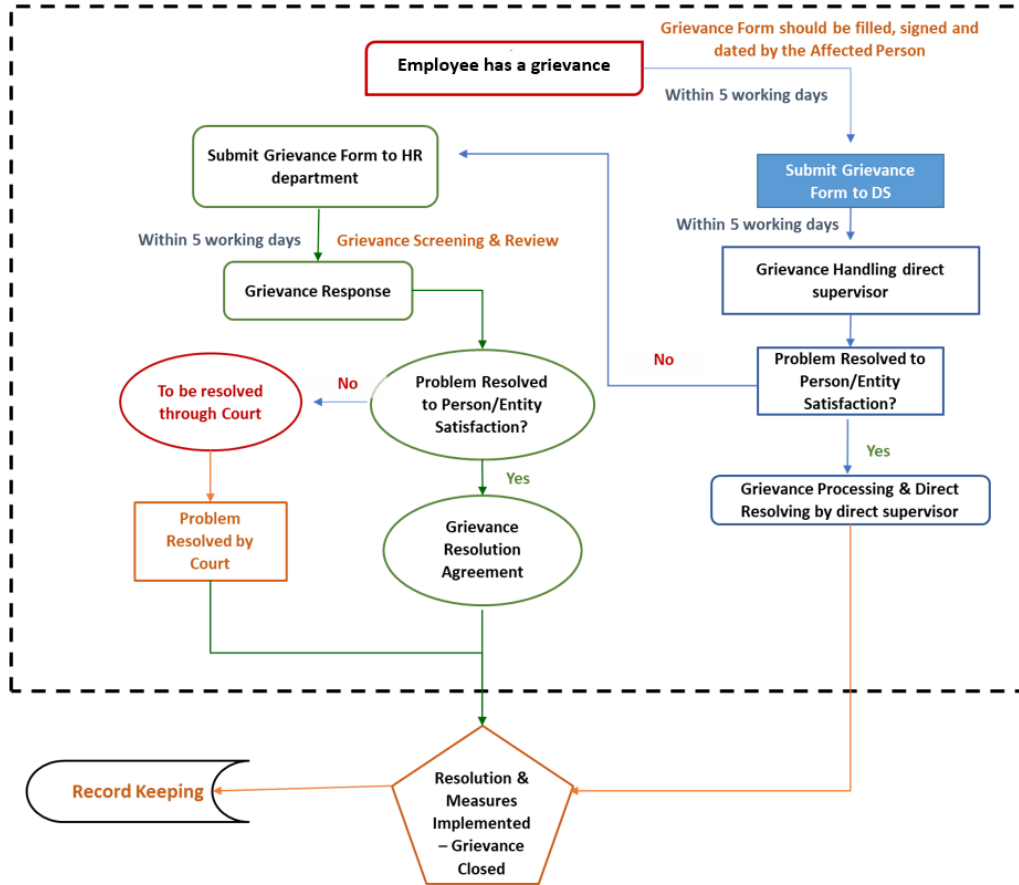


Figure 29. Illustration of the Worker GRM Procedures during the Operation Phase

In the event that NEPCO receives grievances from a third-party entity, NEPCO will handle these complaints in accordance with the same method outlined in the operation phase.

Table 10: Operation Phase Grievance Form

Workers Grievance Form (نموذج الشكاوى العاملين)	
Reference No (رقم المرجع):	Date التاريخ
Employee / Worker Name الاسم	Job Title المسمى الوظيفي
Anonymous submission إخفاء معلومات مقدم الشكاوى	I want to remain anonymous (أرغب بعدم الكشف عن هويتي)
Details of Event Leading to Grievance تفاصيل الحدث المؤدي إلى الشكاوى	
Date, Time, and location of Event تاريخ، وقت، مكان الحدث	Witness(es), If applicable الشاهد / الشهود (ان ينطبق)
Description of Event: وصف الشكاوى	What happened? Where did it happen? Who did it happen to? What is the result of the problem? ماذا حدث؟ أين حدث هذا؟ من فعل ذلك؟ ما هي نتيجة المشكلة؟
What would you like to see happen to resolve the problem? ما هو برأيك مقترحك لحل المشكلة؟	
Employee signature: توقيع الموظف	
Grievance received by Name, Title, Signature: تم استلام الشكاوى من قبل (الاسم / المسمى الوظيفي)	

In the event that NEPCO receives grievances from local community members or other affected stakeholders, NEPCO will address these grievances according to the procedure outlines in Table 11 and Figure 30, with the grievance form remaining consistent with the one utilized during the construction phase (Table 9).

Table 11: GRM Procedure for Local Communities during the Operation Phase

Step	Description of GRM Procedure
Receiving the Grievance	Stakeholders can file a grievance through the following: <u>NEPCO Premises</u> - Suggestions & Complaints Boxes with Complaint forms - NEPCO E-mail: XXXXXXXXX (to be updated by NEPCO) - NEPCO Hotline: XXXXXXXX (to be updated by NEPCO) <i>*Individuals/entities have the right to request that their name to be kept confidential.</i>
Grievance Screening and Review	NEPCO will investigate the complaint’s eligibility for validation purposes. If the claim was rejected for reasons such as being ineligible, has no basis or no action is required, then NEPCO must issue a reasonable response within 5 days explaining the reason for rejection to the complainant with evidence where applicable.
Grievance Handling, Processing, and Resolution	Once the grievance is investigated and clarified, NEPCO will develop and decide resolution options and prepare a response. Grievances will be acknowledged and verified within 2 working days. A resolution/action will be proposed after complaint is verified, and then responded to within a maximum of 5 working days.
Grievance Resolution Agreement	Complaints/Grievances shall be closed when an agreement is reached with those who filed the grievance. This shall be recorded in the grievance log or database accordingly, along with the closing date, and any other supporting documentation or photos to be stored for future reference.
Escalated Grievance Mediation	If the Complainant is not satisfied with the grievance resolution, he/she can revert to court for a resolution.

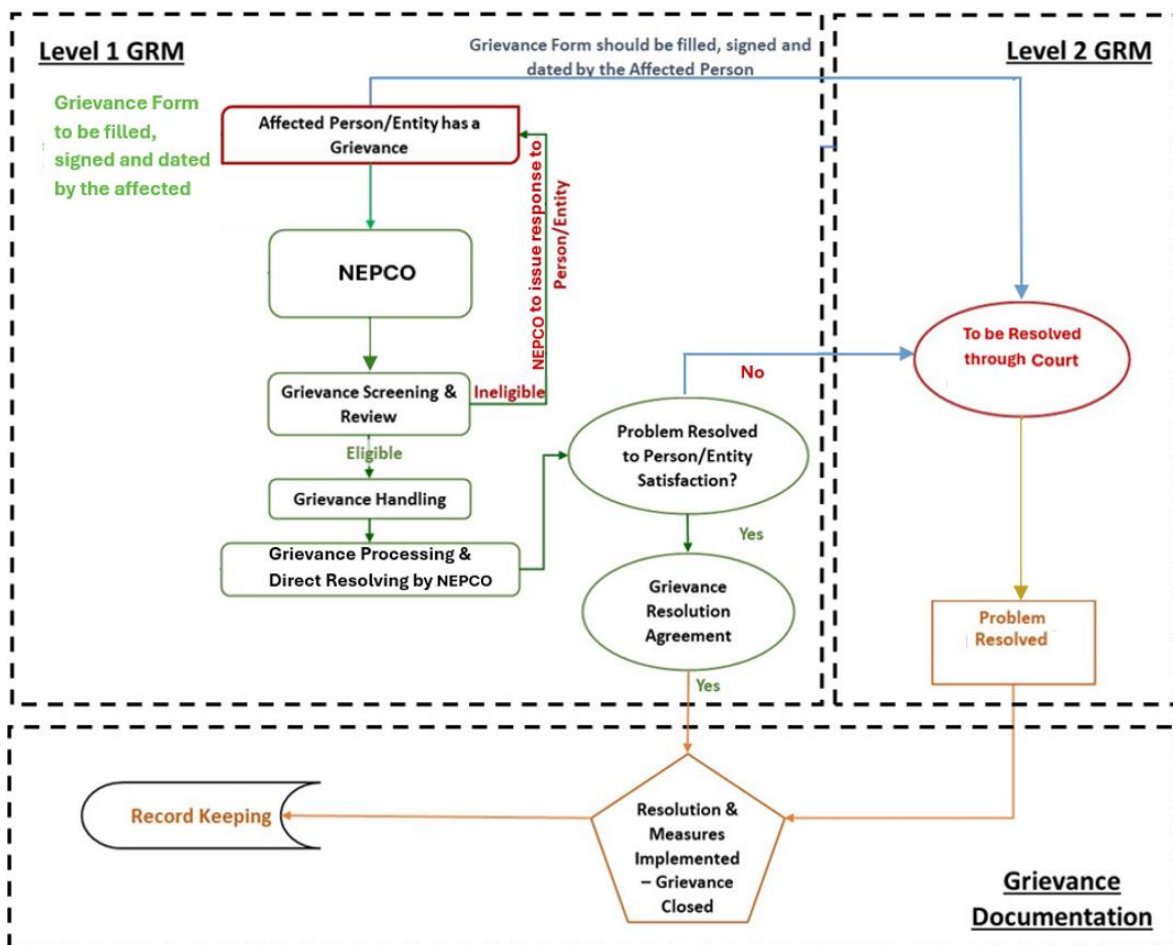


Figure 30: Illustration of the Level 1 and Level 2 GRM Procedures for Local Communities during the Operation Phase

8.3 Grievance Register

It is important that issues raised by the stakeholders are recorded in a logical and systematic way so that they can be tracked through to appropriate resolution and closure. The register will record:

- Reference number for the stakeholder;
- Name and contact details (unless requesting anonymity);
- Date of contact(s);
- Issue(s) raised (comment, suggestion, question, complaint, etc.);
- Proposed response and actions to be taken; and
- Status (recorded, active, closed).

Where many stakeholders raise similar issues, these will be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

8.4 Confidentiality/ Data Management

If a Complainant wishes to remain anonymous this will be accepted. No personal data will be made public. Details of the grievance will only be provided to those directly involved in the examination process (i.e., those involved with remedying the grievance). If confidentiality cannot be guaranteed, for example because of government regulations, the Contractors and NEPCO can suggest to lodge grievances under an alias.

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period as required by relevant laws and regulations on Data Privacy.

9. MONITORING AND REPORTING

The monitoring process will ensure that all stakeholders have been appropriately and effectively consulted throughout engagement process, it also contributes to increasing the efficiency of stakeholder engagement activities as the project progresses.

Consultation and stakeholder engagement will continue throughout Project planning, construction, and operation phases. As discussed above, NEPCO and the main EPC Contractors will be responsible for ensuring good relationships with the local communities during the construction phase. NEPCO, with the assistance of the implementation Consultant (IC), will report on community engagement and grievance issues, as well as submit the results of social and environmental monitoring to the EBRD.

During operation and maintenance, NEPCO will maintain relationships with local stakeholders and be responsible for reporting on Project performance.

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

- Project information disclosure activities.
- Stakeholder consultations/interviews.
- Grievance mechanism
- Monthly and quarterly reporting.

Minutes of any consultation meetings will include the date, location, purpose of meeting and list of participants.

All original written consultation correspondence, including comments, will be retained as evidence of the consultation process and outcomes. Minutes of meetings, or summaries of individual or informal discussions will also be kept on file and made available on request.

During construction, monitoring of grievances and community engagement will be reported on a monthly basis. The CLOs of the EPC Contractors will provide monthly summaries of community grievances and community meetings to NEPCO Officer and the Project Managers of the EPC Contractors who will incorporate these into the monthly construction reports to NEPCO/IC, and the quarterly construction reports to EBRD. NEPCO shall be also responsible to communicate summary of stakeholder engagement activities and grievances in progress reports to EBRD.

During the operation phase, the NEPCO Officer will report on grievance monitoring and community liaison to NEPCO Management as well (or equivalent) on a quarterly basis. Analysis of grievance monitoring will be incorporated into the project's annual reporting.

This SEP is considered as a living document and shall be reviewed periodically during project implementation and updated as necessary.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2019) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

10. CONTACT DETAILS

Throughout the Project, all stakeholders can contact NEPCO through the contact details provided below.

National Electric Power Company (NEPCO)

Telephone: +962 6 5858615

Fax: +962 6 581 8336

Address: P.O. Box 2310 Amman 11181 Jordan

Website: www.nepco.com.jo

Email: info@nepco.com.jo

In addition, NEPCO intends to provide all relevant information to the public (on website provided above) and which will include but not limited to the following:

- Environmental and Social Impact Assessment (ESIA);
- Environmental and Social Action Plan;
- Resettlement Framework;
- Stakeholder Engagement Plan (SEP);
- Non-Technical Summary (NTS);

Hard copies will also be available at the central NEPCO Offices in Amman and well as the NEPCO East Region Centre as per details provided above.

(xxxxxxxxxxxx) information to be added by NEPCO

EBRD will disclose on their website the ESIA Package (ESIA, Resettlement Framework, Stakeholder Engagement Plan, Non-Technical Summary, Environmental and Social Action Plan) for a minimum period of 120 days.