

NEPCO RESTRUCTURING LOAN – JORDAN

Non Technical Summary (NTS)

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1. INTRODUCTION

The National Electric Power Company (NEPCO) is a 100% state-owned public shareholding company established in accordance with the General Electricity Law No. 10 (1996) on the 1st of September 1996 when the vertically integrated state-owned Jordan Electricity Authority was unbundled into 5 separate companies.

NEPCO is licensed by the Energy & Minerals Regulatory Commission (EMRC) to undertake the following:

- Operation of power system and demand / supply control (System Operator);
- Construction, operation and maintenance of system equipment such as transmission lines and substations (Transmission Network Owner);
- Planning of power system development;
- Purchase of electric power from power producers as single buyer and supply of the power to distribution companies and bulk consumers via the National Control Centre (at Amman South). At the moment, the dispatch is done based on a manual system;
- Procurement of fuel for thermal power generation; and
- Import/export of electric power through interconnection with Egypt and Syria.

The European Bank for Reconstruction and Development (EBRD) is now considering providing an up to USD 265 million Sovereign-guaranteed loan to NEPCO, with a tenor of up to 18 years. The proceeds of the loan will be used to assist NEPCO in its reforms and developing Jordan's electricity sector. Up to USD 65 million of the loan will be used for capex investments in NEPCO's network. The balance will be used to refinance existing short term debt. The Project will support NEPCO to adapt its operations to allow for further development of renewable energy in Jordan and to improve the sector's sustainability.

This document (the Non-Technical Summary (NTS) provides a summary in non-technical language of the main findings of the Environmental and Social (E&S) assessment undertaken for the Project. In addition, a Stakeholder Engagement Plan (SEP) has also been developed 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.

The associated E&S impacts of the project are site specific, readily identifiable, and can be mitigated through the implementation of a targeted Environmental and Social Action Plan (ESAP), hence, in accordance with EBRD's Environmental and Social Policy (2014) (ESP), the Project has been categorised as Category B therefore an E&S audit and analysis of the Project is required.

An Environmental and Social Due Diligence (ESDD) has been carried out for the Project by an independent consultant, which included E&S audits and meetings with NEPCO Team, site visits, and review of NEPCO's corporate procedures in terms of Environmental, Health and Safety, and Social (EHSS) management. The ESDD was carried out in accordance with:

- Applicable local, national and regional requirements;
- The EBRD's Environmental and Social Policy (ESP)_2014 (and the incorporated PRs), and relevant European Union (EU) requirements; and
- Relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation.

The ESDD included the assessment of the 'Project' against applicable EBRD Performance Requirements (PRs) and the review of the associated facilities environmental and social risks. The key Performance Requirements of relevance are PR1, PR2, PR3, PR4, PR5, PR6, PR8, and PR10 (PR7 and PR9 are not applicable).

As a result of the ESDD, an ESAP has been prepared and adopted for the Project. The ESAP addresses deficiencies and associated risks, and identifies mitigation measures to ensure that all work to be carried in relation to the Project complies with the EBRD's PRs.

2. PROJECT DESCRIPTION

Based on the EBRD loan objectives, the project setup is divided into the following main levels:

- Macro-level: Overarching project strengthens and reforms NEPCO's corporate setup in order to enhance operations and increase system performance and resilience and also improve the electricity sector's sustainability;
- Micro-level: A set of infrastructure and capex investments as well as technical interventions that enhances the capabilities of the grid to absorb and manage power produced by renewable energy sources which ultimately helps promote renewable energy.

The following text provides a brief description for each of these project levels outlined above.

2.1 Strengthening and Reform of NEPCO

NEPCO was established in 1996 as a result of restructuring the old Jordan Electricity Authority which had all the responsibility of generation, transmission and distribution sectors. Subsequent restructuring in 1999, separated and privatized the generation and distribution sectors and delivered NEPCO into the setup which remains until current date.

From 2008 onwards, different regional economic and political disorder caused financial problems in Jordan. Moreover, the Government of Jordan faced energy security issues due to interruptions in the Egyptian natural gas supply, which in 2009 fuelled about 90 percent of Jordan's power generation, and this forced the country to increasingly rely on more expensive and less efficient diesel and heavy fuel oil (HFO) during a time of high oil prices.

The Government of Jordan (GoJ) decided to bear the financial repercussions and this resulted in a significant increase in NEPCO's operating losses and financial debts, which increased Jordan's gross public debts.

The GoJ had to borrow funds in order to offset debts of NEPCO and the Water Authority of Jordan (WAJ) which increased the total public debt in September 2018 to 96.1 percent of the Gross Domestic Product (GDP).

This triggered several strategic financial and economic decision made by the GoJ in order to offset all these financial burdens. In addition, this necessitated strategic infrastructure investments including the conglomeration of the energy terminals in the Port of Aqaba as well as creating the enabling environment and mainstreaming for the development of Renewable Energy (RE) projects which aimed to reduce supply costs and increase energy security in Jordan.

Since 2011, Jordan's RE market has been expanding and the target of 10 percent of renewable energy in the overall energy mix by 2020 has been achieved in 2017, which led the government to increase the official target to 20% by 2020. To date, more than 2,000 MW of solar Photovoltaic (PV) energy and wind energy projects have been either awarded and operated or planned to be contracted. This also triggered NEPCO's need to strengthen its institutional, regulatory and infrastructure capacity to allow for RE boom.

In 2011, EBRD approved the creation of a €1 billion special fund to launch investments in the four of the Southern and Eastern Mediterranean (SEMED) countries (Jordan, Egypt, Morocco, and Tunisia). Since then, EBRD invested €4.8 billion in more than 120 projects in the region including Jordan.

As part of this programme, the EBRD's loan to NEPCO includes a corporate reform Roadmap which will cover the following:

- Financial Forecasting and Risk Management - the assistance aims at supporting NEPCO in improving its forecasting and analytical accounting tools and developing risk management strategies for each business line.
- Corporate Governance and Compliance - the assistance targets improvements in the corporate governance structure and decision making capabilities of the Company.
- E-Procurement - the assistance aims to support the implementation of an electronic procurement platform and system aiming to extend NEPCO's procurement opportunities to a wider universe of companies, including small and medium enterprises (SMEs), and allow for competitive pricing and improved cost management.

- Renewable energy absorption - support will be provided to analyse Jordan's renewable energy absorption capacity and options to increase it.

2.2 Infrastructure and Capex Investments

NEPCO's planning and technical team in collaboration with the generation and distribution companies prepare a set of documents on a regular basis to enable the planning of the power system development. These documents are submitted to EMRC in order to assist the adoption of the annual Master Plan which includes the generation master plan, transmission master plan, and the system master plan.

As part of the Master Plan, NEPCO forecasts demand and based on the existing supply and transmission system, puts priorities for additional infrastructure developments such as new substations (S/S), expansion of existing S/Ss, and Overhead Transmission Lines (OHTL). NEPCO also estimates the related construction costs for each candidate site and together with the distribution companies selects the best location for the new sub support point sites.

This preliminary site selection is done on the macro-level where the general area is identified and subsequently, the technical and engineering team from NEPCO undertakes site visits and assessments to decide on the most suitable location/plot. This selection is done based on pure engineering criteria without any considerations for environmental concerns. The team also takes into account trying to find a location with the minimum need for land acquisition to the extent possible in order to reduce the financial implications. After finalising the site selection, NEPCO reports the detailed construction plan to EMRC and set out towards planning and building the new infrastructure components once they get a no objection from EMRC.

NEPCO has transmission grids and a National Control Center (NCC). According to NEPCO, the total capacity of its substations is 11,484 MVA and the total length of 132 kV and 400 kV transmission lines is 4,426 km.

Based on negotiations and discussions between NEPCO and the EBRD, a list of the infrastructure developments has been agreed to improve renewable energy integration and this includes the following main items:

- supporting the implementation of smart grid systems and automated control center (ACC) which are essential to improve the management of the electricity supply and demand balance and reduce renewable energy curtailment; and
- construction and/or extensions of a number of substations in different areas in Jordan. The EBRD loan does not cover establishing any OHTL for existing or new S/Ss. However, these are considered as associated facilities and shall be also discussed in the text below. The table below provides a list of these planned infrastructure components:

Table 1: List of Planned Construction &/or Extensions of Substations as part of the EBRD Loan to NEPCO

Project name	Description	Location	Need for associated facilities (OHTL)	Completion timeline
New S/Ss				
NEW ZERQA Substation	- Will be used to feed load in Zerqa and some parts of Amman Governorate.	Zarqa	No	2021
New JERASH Substation	- This substation is very important to the electrical system as it's used to ensure safe and reliable operation of the electrical system in the northern region. The northern zone contains Round 2 PV projects (150 MW) and more than 300 MW as a wheeling project through NEPCO and EDCO. Jerash substation is important to ensure evacuation of generated power and solving transmission line congestion in the northern area of Jordan.	Amman	Yes: building and installing a new corridor from Samra power plant to Jerash and from Jerash to Rehab at 132 kV level	2021
New FUHIES Substation	- Will reduce 400 kV Amman South – Qatrana corridor congestion resulted from adding RES in the southern area. Moreover, there is a possibility to add around 30 MW PV projects as wheeling projects to be connected to this substation.	Amman	No	2021
Round 3 Wind Substation	- Will evacuate 50 MW (Round 3 wind) project and transmit it via the green corridor to the load center in	Location to be	Still to be determined	2022

	middle and north of Jordan.	confirmed		
MAA'N DEVELOPMENT AREA (MDA2) Substation	- To evacuate 200 MW (Round 3 PV) projects and transmit it via the green corridor to the load center in middle and north of Jordan.	Ma'an	Yes	2021
Substations Extension				
- Hassan Industrial Estate S/S - Azraq S/S - Rishah S/S - South Amman - Irbid City - Ruweished - Al Rajhi Cement Factory - Subeihi	- To accommodate increased demand, population growth, and wheeling projects in these areas	Multiple	No	Not Available

The S/Ss included in the table above are located in different areas in Jordan to match the required need for additional electricity supply.

The expansion will take place for already existing S/Ss built in different periods and as part of separate projects and do not utilise the whole land area on which they are built. Each of the existing S/S plot has readily available area that would accommodate the expansion infrastructure without any need for any land acquisition. In addition, these S/Ss are already connected to an existing OHTL and hence there is no need to establish any additional associated facilities.

As for the new S/Ss, the list below provides clarification on the location and land take requirements:

Table 2: Land Take Requirements for the New S/Ss and for any Associated Facilities

Project name	Land take Requirements
NEW ZERQA Substation	New Zerqa was a committed project in 2015 and the site has been selected and land acquisition a couple of years back. An OHTL already passes in the area and hence there is no need to establish any new associated facilities. The selected site is located within regularised land use boundaries and in close proximity to residential areas which might cause difficulties when requesting the site permit and environmental permit from the Ministry of Environment (MoEnv) since the latter requests that S/Ss are not located within regularised land use boundaries.
New JERASH Substation	Project located in agricultural area outside regularised land use boundaries and is close to an adjacent forest area. This S/S requires building and installing a new OHTL corridor from Samra power plant to Jerash and from Jerash to Rehab at 132 kV level. NEPCO Team shall undertake site specific assessments and surveys in order to decide on the most suitable location for the S/S. This shall require going through a land acquisition process and compensation for the lost land and any crops on those plots in accordance with the Jordan Land Acquisition legislations.
New FUHIES Substation	This substation has been in operation since 1979 and it was used to supply cement factory load in area closed to Amman where the load is very high, Jordanian government agreed with cement factory to move the factory to non-populated zone and to stop operation in fuhies to reduce environmental impact. Therefore, NEPCO through the availability of the land will rehabilitate the existing substation to be used as 132/33 kV to supply load in Amman and salt area this decision was based on load forecast study in this zone that expected to have high growth level. The land is on the border of regularized land use boundary and is within a densely populated area. The ability to obtain a site permit and environmental permit shall be discussed with the MoEnv.
Round 3 Wind Substation	Both MDA2 and Round 3 switching substations are used as a connection point to MDA round 3 projects with 200 MW PV capacity and to round 3 wind project with 50 MW capacity consequently.
MAA'N DEVELOPMENT AREA (MDA2) Substation	The MDA2 S/S shall be located within the Ma'an Development Zone and the land for the S/S is already allocated by the Ma'an Development Company. An additional OHTL will be required to connect MDA2 S/S with MDA1 S/S. However, those do not entail any issues or impediments in terms of site approvals. The location of round 3 switching station is not decided yet with expectation that the substation will be in tafila or around Tafila region. Mostly, the Direct proposal RE bidders allocate an area on the land they rent or procure for the RE project and thus this would facilitate locating the new S/S. The need for an OHTL is still unclear since there may be a potential to connect with the existing OHTL from Round 1/wind.

NEPCO technical team shall undertake the final selection of the S/S locations after consultation with the MoEnv and shall assign an independent E&S consultant in order to identify any E&S impacts associated with the project. The main aim, to the extent possible, will be the avoidance of any E&S adverse impacts including any physical or economic resettlement.

2.3 Project Components

The key components of the S/S are the following: Power transformer, Current transformer, Voltage Transformer, SCADA panels, AC panels, DC panels, Reactive power system (STATCOM) - depends on the project, Surge Arrestor, LV, MV and HV cables, SCADA Parts and sensors, Servers, Isolaters, Gantries, MV Switch gears, Earthing system, Metering panels, billing system, and Disconnecters.

Associated facilities include the Overhead Transmission Line.

3. ENVIRONMENTAL PERMITTING

The Instructions for the Selection of Development Projects for the Year 2018 issued by Virtue of the Article 30/Paragraph B of the Environment Protection Law Number 6 for the Year 2017 does not indicate separation or setback distances for S/Ss from residential areas or sensitive receptors.

However, the EIA Regulation (No. 37, 2005) which sets out the EIA process in Jordan and has associated annexes that provide screening criteria, listing the types of projects which require a comprehensive Environmental Impact Assessment (EIA) or a preliminary EIA study, and those for which neither is needed; indicates that all energy generation projects including their associated facilities require a comprehensive EIA study to obtain an environmental permit.

Based on discussions with the MoEnv in relation to these substations, it was clarified that the Instructions for the Selection of Development Projects for the Year 2018 does not provide setback requirements since this is dependent on the scale of the substation and the purpose. However, the process would include submitting an application to the MoEnv and identifying the project with clear description of components and scale which would then be studied by the Central Licensing Committee to decide if the location is approved and whether a comprehensive or Preliminary EIA is required.

For the S/Ss and any energy generation or transmission projects, the MoEnv would then check the location and ensure it meets the following criteria: it is not within regularised land use boundaries, it is within a suitable setback distance from sensitive receptors (between 500 and 1000 metres depending on the scale of the S/S), and not within forest areas. They will also assess its proximity to protected areas and Important Bird Areas (IBAs). If the site is close to or located within a protected area or IBA, it does not necessarily mean that the location will be rejected but this shall be assessed by the committee.

Substations and overhead transmission lines are Category 1 projects and would require a comprehensive EIA study to obtain the environmental permit.

The EIA would also require a public scoping hearing to set the TOR. The project and environmental baseline shall be described, impacts are to be assessed, and mitigation measures to be developed. Article 4 of the Regulation requires Environmental Approval of industrial, agricultural, commercial, housing or tourism projects or construction development, or project types listed in Annexes 2 & 3.

The EIA legislation is broadly in line with the process required by the EU Directives, with the exception of elements related to social assessment, and on consultation and information disclosure. Crucially, it falls short on implementation and follow up, especially in relation to follow up on the Environmental and Social Management Plan (ESMP).

Based on the above and as part of the continued Project development and detailed engineering design, the S/Ss and their associated facilities (if any) will be subject to an EIA in line with the Jordanian legislations. NEPCO does not necessarily have to carry out separate EIA studies for each of the S/Ss but according to

discussion with the MoEnv it is proposed to group the S/Ss (new and extensions) in accordance with their spatial distribution (e.g. north, middle, and south S/Ss) which would entail 3-4 separate EIA studies.

Notwithstanding the above, site inspections and review of design proposals have indicated the key environmental & social risks and benefits as below.

4. POTENTIAL IMPACTS AND BENEFITS OF THE PROJECT

As discussed above, the Project will result in crucial positive environmental and economic impacts on the strategic and national level given the current challenges the energy sector in Jordan is facing. The key Project benefit is the support to further economic development and decarbonisation of the Jordanian electricity system. The Project is required as result of increased energy demands, which if not addressed, will potentially constrain economic development. It should also be recognised that the Project will support the power evacuation of several renewable energy projects located in different areas of Jordan which is a clean power generation that would help reduce greenhouse gas emissions and be part of climate change adaptation measures. Such positive impacts underpin rationale for the Project.

Potential impacts include issues such as management of waste, handling of potentially hazardous materials during construction, and management of noise and dust emissions during construction. However, these risks are considered to be short-term (associated with construction) and relatively routine for Projects of this nature. Good International Industry Practice will be applied to manage these risks. In terms of social risks, these include potential impacts on Right of Way, land acquisition, loss of amenities and assets such as trees. These risks will be minimised through the careful planning and supervision of the Project.

Any OHTL that would be required for any of the S/Ss is not covered by the loan but is considered as an associated facility that shall be covered in the E&S assessments. The land requirement for new OHTL that would be required for the Jerash Industrial S/S, Round 3 Wind, and MDA2 is currently unknown, however it is not anticipated that physical resettlement will be required for the purpose of construction of associated facilities, however, there might be cases when the farmers will lose part of their grazing or farmland areas due to the location of the towers or tower access road. In these cases, there will be a provision of sufficient compensation.

Any new OHTL also has the potential to impact bird migration corridors. This will be confirmed by a bird survey to be undertaken at a later stage. Potentially sensitive areas will be avoided, and adoption of various biodiversity mitigation measures are expected to be implemented as part of the project, such as a horizontal profile for the wires and use of bird diverters and deflectors, hanging conductors which are widely used and accepted as good international practice for reducing bird mortality resulting from transmission lines.

5. KEY MANAGEMENT AND CONTROL ACTION AREAS

An Environmental and Social Action Plan (ESAP) was developed for the NEPCO Restructuring Loan in order to align the Project compliance and management system with the EBRD performance requirements. That will ensure adequate measures are implemented to avoid or minimise environmental and social impacts of the proposed investment. Recommendations in the ESAP include:

- NEPCO shall assign an external consultant to undertake the Environmental and Social Impact assessment (ESIA) studies for the infrastructure investments including the associated OHTL and obtain the environmental permit from the MoEnv. This shall include holding a public hearing with related stakeholder groups and communities, including project-affected groups and local nongovernmental organizations (NGOs) should be consulted about the project's environmental and social aspects and their views should be taken into account when finalising the project design. ESIA shall include, but not limited to, the following: Hydrological Survey and Drainage Assessment Study, pre-construction bio-surveys, socio-economic survey, archaeological survey, and others;
- NEPCO to enhance, extend, and revise the existing Environmental, Health and Safety (EHS) management system to be aligned with the EBRD's ESP (2014) (and the incorporated PRs), and relevant EU requirements and also to include the Project and the construction thereof. The Contractor shall submit a

project and site specific Health, Safety and Environment (HSE) MS in line with local legislations, EBRD PR 1 and according to requirements of ISO 14001 and OHSAS 18001

- The following provides an example of the specific procedures related to the environmental protection that is required based on the ESAP and should be incorporated into the ESMP:
 - Prepare a legal register and implement all National legislative requirements to ensure compliance with Jordanian law
 - Storage and handling of Waste.
 - Soil erosion and sediment control from materials sourcing areas and site preparation activities.
 - Dust and other emission control mechanisms (e.g. from vehicle traffic, land clearing activities and materials stockpiles).
 - Noise management/ controls from heavy equipment and truck traffic.
 - Management of Construction waste generation.
 - Potential for hazardous materials and oil spills associated with heavy equipment operation and fuelling activities.
 - Evaluate Electric and Magnetic Fields exposure.
- The following specific procedures related to the community health and safety during construction is required based on the ESAP and should be incorporated into the ESMP:
 - Onsite and offsite emergency planning for the sites with bulk storage of heavy fuel oil;
 - Provision of road signs and hazard signs during the construction stage;
 - Provide sufficient notice to communities about the construction work; and
 - Develop specific routes to ensure impact on community rights of way is minimised.
- As a part of EHS Management System develop a Site-Specific Labour Management Procedure that will apply to all construction workers including contractors and subcontractors.
- Undertake consultation activities with local community grazers (through regular site visits to the area) to inform them about the new S/Ss and the expansion works on existing S/S as well as the accompanying new OHTL, their locations, construction schedule and grievance mechanism
- NEPCO to schedule surveys for S/S locations and OHTL route in order to survey those on private lands so the census and land valuation and acquisition process can proceed as early in the process as possible.
- If needed, NEPCO to appoint qualified consultant to develop a Land Acquisition Framework and a Land Acquisition and Compensation Plan (LACP), to ensure land acquisition and compensation meet national related legislations with increased consultation and information disclosure, and to monitor the land acquisition and compensation process to verify it meets the requirements of the LACP.
- The LACP will also identify any vulnerable individuals and groups who will need additional mitigation and consultation measures.

In addition to the above, NEPCO will be required to establish a Project Implementation Unit (PIU) with a multidisciplinary team from NEPCO with a specified scope acceptable to the EBRD. The PIU will be assisted by a qualified PIU Consultant for the Project preparation phase, including preparation of tender documents and complete tendering process for EBRD financed contracts under the Project. The PIU Consultant will also assist the Company with supervision and monitoring of the Project implementation phase until Project completion. The PIU Consultant shall monitor the implementation of the Project in compliance with EBRD's ESP. This structure should strengthen Project implementation ability within NEPCO and mitigate procurement delays.

6. ENVIRONMENTAL & SOCIAL MANAGEMENT & MONITORING

NEPCO will be establishing a comprehensive Health, Safety, Social and Environmental (HSSE) Management System (MS) that is specific for each S/S nature and site location. NEPCO shall also require the same from their contractors and site contractors. The objective of such systems is to manage HSSE risks from project's construction and operation and ensure compliance with relevant EHSS national legislations and international best practice.

NEPCO will be monitoring the implementation of HSSE requirements by the contractor and operation during the construction and operation phase. In addition, the Project will be subject to periodic independent monitoring as per the requirements of the lenders.

7. STAKEHOLDER ENGAGEMENT PLAN

A Stakeholder Engagement Plan (SEP) has been developed for the Project with the objective of identifying key stakeholders and ensuring that they are informed in a timely manner of the project development.

The SEP also identifies an additional grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries, suggestions etc. It will be reviewed and updated on a regular basis. The SEP shall be updated if activities change or new activities relating to stakeholder engagement commence. The SEP will also be reviewed periodically during project implementation and updated as necessary.

All interested and affected parties will be able to find the following documents regarding the NEPCO Restructuring Loan Project the subject of EBRD's loan on the NEPCO website (<http://www.nepco.com.jo>):

- Non-Technical Summary (NTS) – November 2018
- Stakeholder Engagement Plan (SEP) – November 2018

These documents will remain in the public domain for the duration of the Project. The Stakeholder Engagement Plan will be updated periodically. Hard copies of these documents will be deposited at the NEPCO central offices in Amman at the following address:

National Electric Power Company (NEPCO)

Telephone: 00962 6 5858615

Fax: 00962 6 5818336

Address: P.O. Box 2310 Amman 11181 Jordan

Website: www.nepco.com.jo

Email: info@nepco.com.jo &/or aadaileh@nepco.com.jo

Hard copies will also be available at the following NEPCO Regional Support Centres. To contact any of these centres, dial NEPCO central offices in Amman (contact details above) and request your call to be transferred to any of the NEPCO Regional Support Centres as relevant to the location of the S/S of interest.

#	NEPCO Regional Support Centres	sub-projects
1	North Region Centre	<ul style="list-style-type: none"> ▪ New Jerash S/S ▪ Irbid City S/S ▪ Hassan Industrial Estate S/S ▪ Al Rajhi Cement Factory S/S
2	East Region Centre	<ul style="list-style-type: none"> ▪ Azraq S/S ▪ Ruweished S/S ▪ Rishah S/S
3	Middle Region Centre	<ul style="list-style-type: none"> ▪ New Zarqa S/S ▪ Fuheis S/S ▪ South Amman ▪ Subeihi S/S
4	South Region Centre in Ma'an	<ul style="list-style-type: none"> ▪ MDA2 S/S ▪ RD III Wind S/S

NEPCO will implement a Grievance Procedure to ensure that it is responsive to any concerns and complaints particularly from affected or interested stakeholders and communities. Stakeholders, including the public, will be able to use the Grievance Procedure and information on this Procedure will be disseminated. The Grievance Procedure will also be available on the NEPCO website. Project grievances can be received through NEPCO's dedicated landline and e-mail address for complaints as specified below.

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Grievances can also be received by NEPCO via the regional offices and/or the municipality or governor offices. All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.

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

The **HSE Department** will be responsible for the implementation, monitoring and updating of the Stakeholder Engagement Plan. NEPCO higher management shall undertake quarterly reviews of the Stakeholder Engagement Plan implementation to ensure that the related NEPCO staff is implementing the Stakeholder Engagement Plan obligations (e.g. checking responses and logging of complaints and grievances).

EBRD will disclose on their website a Project Summary Document (PSD) (<https://www.ebrd.com/work-with-us/projects/psd/nepco-restructuring-loan.html>).

8. CONTACT DETAILS

For NEPCO to fill