

“East Amman Society for Environmental Protection” Comments on Secretariat’s draft Implementation Plan “Towards A Pollution-Free Planet”

East Amman Society for Environmental Protection / Jordan tried to the best of its capability to work in transparent way in the protection of environment, related human rights, climate change combat & enhancing sustainable development, but faced an extremely severe resistance, obstruction & intimidation for all our efforts from the government, the polluters, the lending banks, some international donors such as (UNDP, USAID), Parliament & few tailor-made environmental societies working under the regulations of the Ministry of Environment.

As the government of Jordan, the private sector being pollution & GHG source emitters, the financing banks, many of the international organizations in Jordan, the parliament & five environmental societies being partners of the government, all don’t recognize the role of the environmental societies (112) & prevented any sort of financial support to them & denied their mission, this resulted in complete absence of real tangible success stories because we lack the absolute minimum financial capability to even implement basic commitments.

We were prevented from, obstructed from executing or conducting any achievement in protecting the environmental, social, developmental and economic severe situation Jordan is suffering & from exercising our set activities in the field of environmental protection and prevented the required support or cooperation from the owners of projects, the government or the international donor organizations situated in Amman.

Climate change is already endangering many Jordanian vulnerable communities, infringing on their ability to realize their human rights, including the rights to life, health, employment, water, culture, compensation, freedom of expression, an adequate living, a healthy environment & leaving them behind.

We seek the government not to confiscate our rights to participate, individually in the formulation of decisions of direct concern to our environment, and not to deny our right of access to means of redress when environment has suffered damage or degradation.

We will continue to work with governments & all concerned national & international parties despite their refusal to recognize us & resistance. to urgently implement the right transparent policies that when really executed reduce the 1.5/2 degrees’ goal, pollution & the vulnerability of affected Jordanian communities by addressing poverty in all its forms and its causes, creating opportunities, providing access to basic services, and establishing well-designed social safety nets before the negative impact of climate change & pollution becomes more acute. We will keep on seeking engagement with the government, international donors & the business to challenge development and investment that creates future vulnerabilities as the climate changes, and campaign for a rapid, inclusive and climate-informed sustainable development. We will strive for emission reductions in our own work and that of others, and seek initiatives, projects & programs from the

government that make Jordan fulfill its INDCs, mitigate the climate change & pollution impacts on the vulnerable affected communities & offer proper social, health protection & required sustainable development of the affected areas.

Jordan environmental societies believe they can achieve their vision of reducing poverty and suffering in spite of climate change & pollution, respond with relevant development, mitigation, adaptation and risk reduction interventions to help vulnerable communities cope with the short & long term impacts of climate change.

The following comments offer an overview of the environmental, social & development situation in Jordan:

- ✓ Urge the government to engage representation of environmental societies in the National Committee of Climate Change (NCCC) for coordinating and facilitating the development, decision making and submission to donors of proposals for international financing of mitigation and adaptation projects and programs.
- ✓ Engaging the civil societies represented by the environmental societies in the whole phases of climate change combat actions, pollution protection & sustainable development actions, plans & committees. Complete ignorance & prevention of civil societies & the required platform and network for active stakeholder participation & absence of engagement of civil societies & complete ignorance of environmental societies except a handful who work under the umbrella of Ministry of Environment & gets its preferential treatment & full support in environmental sector.
- ✓ Urge the government to conduct a real Environmental & Social Impact Assessment (ESIA) for the projects with engagement & free prior informed consent “FPIC” of the local affected communities & stakeholders. ESIA should include real true environmental, health & social base data conducted by all parties. Strategic Environmental Assessment “SEA” should be implemented for areas having many accumulated pollution sources.
- ✓ Urge the government to implement the preventive nature deterrent and corrective policy to enforce polluters to implement the environmental & social mitigation & monitoring program (ESMMP) by neutral accredited party with engagement of local affected communities which will reduce the environmental degradation & makes the recoverability of pollution and environmental degradation possible and to permit the private sector & NGOs to accomplish the CEMS monitoring tasks as the Ministry of Environment lacks the technical tools, equipment, specialized manpower & accreditation as this is the only way to determine the pollution emissions for each source of pollution & on the contrary the government permits the polluters to operate & pollute the environment without having to monitor any kind of pollution emissions & the government legalized this in the environmental law & prevented any neutral accredited party to conduct the required pollution monitoring emitted from the projects scattered & threaten & detain anyone who wants to request such monitoring tests.

- ✓ Urge the government to engage the environmental societies in the hot spot areas in the National Stakeholders List (NSL) related to climate change.
- ✓ Request the government to implement of Capacity building as a national priority (vulnerable areas were excluded from the Priority Areas for Capacity-Building in Developing Countries, as listed in Decision 2/CP.7.)
- ✓ Urge the government to enhance & build experience to develop technical proposals for NAMAs & awareness of technology transfer mechanism.
- ✓ Urge the government to launch National Greenhouse Emissions Information System to enhance the accessibility and transparency, with emissions database publicly accessible through a dynamic web interface.
- ✓ Urge the government to direct the financial aids the government got for climate change combat to assist Jordan to respond and adapt to climate change, climate change education, training and public awareness in the vulnerable affected areas, on the contrary it offered to the polluters (who should pay & not paid for).
- ✓ Urge the government to adopt proper siting of projects, proper zoning and Land Use Planning, since all types of class “A” & “B” are situated in the same vulnerable areas who are left behind.
- ✓ Ask the government to build well-functioning local democracy which needs a strong and functioning civil society that has the resources to provide strong voices, and that is given the opportunity to participate in arenas where real decisions are made.
- ✓ Urge the government to ask the business sector to adopt & implement their Corporate Social Responsibility “CSR” policies at all levels of operation to the vulnerable local affected communities.
- ✓ Ask governments to prevent business from dumping their toxic wastes in low wealth areas & deteriorating the pollution of neighborhood air.
- ✓ Urge the government to include the vulnerable areas in the Priority Areas of Capacity-Building as listed in Decision 2/CP.7.
- ✓ Urge the government to form the required National Greenhouse Emissions Information System.
- ✓ Urge the government to take the required measures to identify and assess potential economic, social and policy measures and human interventions that can be implemented in Jordan to reduce anthropogenic emissions of GHG emissions in different sectors at the national level.
- ✓ Urge the government to direct the largest portion of the financial funds the government got for climate change combat to assist Jordan & to go to respond and adapt to climate change, climate change education, training and public awareness, to vulnerable communities & to degraded polluted areas.
- ✓ Urge the government to stop installing class A & B projects in already degraded vulnerable certain areas like (East Amman, Zarqa,...) without as these areas house hundreds of non-compliant class “A” & “B” projects.

- ✓ Urge the government to prevent polluters to stop dumping their toxic wastes in low wealth areas & to reduce the pollution of neighborhood air as they are legally violating the basic human rights in life, health, livelihood, education, employment, freedom of expression,etc.
- ✓ Urge the government to consider Environmental, climate change, development & Economic Justice.
- ✓ Urge the government of Jordan to set up a reasonable technical measurement system including accredited laboratories & qualified technical staff that will be enabled to measure & monitor the sources of pollution & to take the required corrective actions prior to environmental deterioration with engagement of environmental societies. Strengthen the implementation of MRV system of GHG inventory & introduce a national system for the collection, processing and documentation of GHG emissions data engaging the environmental societies & specialized training for the NGO sector.
- ✓ Severe air pollution which degraded many areas in Jordan.
- ✓ Disposal of hazardous industrial & medical waste in a non-environmentally sound manner.
- ✓ Lack of solid waste management system (reduction, segregation, recycling)
- ✓ High levels of carbon, sulphur & ash content in the Jordanian fuel.
- ✓ Absence of implementation of real environmental & social impact assessments with engagement of NGOs by accredited neutral parties.
- ✓ No implementation of Environmental & Social Mitigation & Monitoring Programs (ESMMP) with engagement environmental societies.
- ✓ Non-enforcement of states to comply with their international responsibilities in the international treaties or at least imposing certain human rights related requirements on the funding schemes.
- ✓ Absence of precautionary principle to determine the sources of pollution.
- ✓ Weak promotion of sustainable development.
- ✓ Severe air pollution & GHG emissions in certain vulnerable areas.
- ✓ Lack of required national climate change related laws & regulations
- ✓ Lack of Enhanced national/international action on mitigation of climate change.
- ✓ Absence of capacity-building on climate change, pollution & SDGs
- ✓ Government obstruction to adequate and sustainable financial resources and technical support of the NGOs.
- ✓ No coordination or cooperation between public and nonpublic stakeholders in Jordan (environmental societies).
- ✓ GHG emissions projects are all situated in the hot spots areas like East Amman, Zarqa.etc & none of the government claimed GHG mitigation projects mentioned in the Third National Communication on Climate Change “TNC” was implemented in these hot spot marginalized areas & didn’t implement a mitigation scenario on greenhouse gases reduction, consistent with national development goals, potential effectiveness of implementation policies, data availability for evaluation and other sector-specific criteria.

- ✓ **The government didn't build a Climate Change Strategy nor incorporated a mix of policy instruments, including voluntary action, strategic investment, government regulation and market measures, to enable Jordan to meet its Kyoto target and provide a framework for climate change action over the longer term.**
- ✓ **The government didn't adopt any emissions management system as a leading action on the national commitment to its Kyoto Protocol target and a lower greenhouse signature in the longer term.**
- ✓ **Violation of human rights from business harms.**
- ✓ **Enforce compliance of national environmental laws, regulations, policies, measures & programs to comply with the binding international environmental & climate change-based laws, treaties & protocols & assure their execution in a transparent & partnership-way with engagement of civil societies representatives.**
- ✓ **Assure that the international financial funds earned by Jordan be spent on real mitigation & adaptation measures & enhancing awareness of climate change funding mechanisms that is related to the vulnerable communities, their degraded environment & to enhance the sustainable development of these areas & address the needs of vulnerable communities & stop sending it to the polluters who should pay for their GHG emissions & pollution & not paid for.**
- ✓ **Assure that the environmental, climate change combat & social mitigation measures that are the responsibility of the project owners / operators be applied & the polluter pays principle is applied to protect the human rights of the vulnerable communities in live, health, livelihood, development & much more. Absence of "Polluter Pays" principle as the largest percentage of emissions' reductions should be accomplished through mitigation measures executed by the polluters on their own expense according to "polluter pays" principle & they are legally protected for not implementing these measures.**
- ✓ **Include some prerequisite conditions of granting funding to assure proper use of such funds to respect of human rights, engagement of civil societies, monitoring of emission sources through neutral parties, ...etc.**
- ✓ **Assure national commitment to reduce GHG emissions according to the INDCs' national target with the real engagement of civil societies representatives as the non-reduction will violate the vulnerable communities' rights of living, health, livelihood, development, employment, freedom of expression, education & others.**
- ✓ **Urge the international environmental offices in Jordan (UNDP, USAID, Greenpeace, Fredrich Ebert, IUCN, ..) to be transparent with their duties & not to be biased to the government & only deal with the government according to the government instructions & request them to recognize the role of civil societies in the environment, climate change combat & SDGs & respect related human rights.**

- ✓ Urge the government to establish and run an effective transparent real MRV system with engagement of environmental societies both on macro level and on sectoral level for developing NAMAs.
- ✓ Urge the government to stop installing more non-compliant class “A” & “B” projects in vulnerable degraded areas that is housing already hundreds of such non-compliant projects “East Amman, Zarqa, Tafeelah...” & consider the “environmental justice”.
- ✓ Urge the government to activate participation of private sector in climate change activities to reduce the GHG emissions & to mitigate the environmental & social impacts on vulnerable communities & their environment & to fulfill their CSR responsibilities towards them.
- ✓ Urge the government to enforce industrial & services sector to comply with the required international performance standards & require to improve the quality of the Jordanian fuel as it contains very high levels of carbon, sulphur & ash & stop using coal & tires as sources of energy in the cement & industrial plants.
- ✓ Urge the government to introduce certain pollutants’ testing laboratories (Air, Blood...) like dioxins, furans, PCBs, ...etc.
- ✓ Urge the government to prohibit using waste incineration & instead use the environmental friendly technology such as ozonators.
- ✓ Urge the government to seriously adopt the required mitigation & adaptation measures related to air pollution & GHG emissions with engagement of the environmental societies.
- ✓ co-ordinate funding to integrate climate change adaptation with disaster risk reduction, resilience building and sustainable development strategies to reduce poverty and suffering.
- ✓ Urge the government to prevent using hazardous Ozone Depletion Substances “ODS”.
- ✓ Urge the government to prevent incineration of hazardous waste.
- ✓ Urge the government to request accreditation for the environmental testing laboratories.
- ✓ Urge the government to force the projects owners or operators to implement a stakeholder engagement plan (SEP) with a grievance mechanism consistent with international Performance Standards that can facilitate early indication of, and prompt remediation for the local affected communities & stakeholders.

Chairman EASEP
Eng. Farhan Al-Daboubi