To: Social and Environmental Compliance Unit
Office of Audit and Investigations,
United Nations Development Programme
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[redacted]

Date: June 16th 2026

Subject: Concerns Regarding the Social and Environmental Standards of UNDP Implemented Projects and Programs in Aqaba, Jordan

1. Introduction and Context

[redacted]

- The Program is funded by the Global Fund for Coral Reefs (GFCR), with an ambition of USD 10 million over six years "2024–2030".
- The Project is supported by Global Affairs Canada (GAC), with a budget of CAD 12 million over four years "2024–2028".

Given the global scientific significance of the Gulf of Aqaba's coral ecosystems, particularly their scientifically demonstrated resilience to climate stress, these resources constitute a national asset for Jordan and an important component of global natural heritage. Accordingly, the implementation of the Program and the Project must adhere to the highest environmental and social safeguards to ensure that these investments achieve sustained and credible outcomes.

2. Rationale and Eligibility for Raising Concerns

[redacted]

Given the scale, strategic importance, and international visibility of these interventions, it is essential that their execution fully reflects the principles of transparency, inclusiveness, scientific rigor, and accountability. [redacted] to ensure that implementation aligns with both international safeguards and national regulatory frameworks. [redacted]

[redacted]

3. Key Areas of Concern

3.1 Local Community Inclusion and Benefit-Sharing

The Program Document "pp. 80 - 85" explicitly emphasizes:

- Inclusion of local community members in employment and leadership roles, with gender-balanced participation
- Representation within governance bodies particularly the Steering Committee and Sub-Projects' Selection Committee of the Blue Economy Innovation Center.

Current engagement appears largely limited to conventional workshops and unclear training activities. While might be valuable, these do not enable meaningful participation in decision-making, provide access to investment and co-ownership opportunities, or fully reflect the intended principles of inclusive management and blended finance. Accordingly, this gap risks limiting local ownership and may affect long-term sustainability of the target outcomes.

3.2 Alignment with Approved Frameworks and Compliance Risks

Certain activities appear to diverge from the originally approved program frameworks. Such deviations raise concerns of technical and environmental risks regarding compliance with UNDP Social and Environmental Standards, alignment with national regulatory frameworks including ASEZA requirements and eligibility of expenditures under donor agreements. In addition, some activities may introduce direct environmental and operational risks that warrant careful review.

3.2.1. Concrete Artificial Reef Deployment Without Adequate Assessment

A tender issued in December 2025 proposes deployment of a large concrete artificial reef structures "Plate 1" within Aqaba Marine Reserve "AMR", without a comprehensive scientific feasibility assessment or a formal Environmental and Social Impact Assessment "ESIA"

Interventions of this nature in sensitive marine environments require rigorous evaluation. Without such safeguards, there is a risk of habitat disturbance or degradation, impacts on coral communities, and misalignment with the conservation objectives.

3.2.2. Use of Jet Skis for the Marine Protected Area Patrolling

Procurement of four electric jet skis for patrol operations presents several potential concerns:

- Underwater noise disturbances affecting marine ecosystems
- Resuspension of sediments in shallow reef areas, increasing turbidity and stress on corals
- Safety considerations for divers within the relatively small and heavily utilized marine reserve having over 30 diving sites.

A structured environmental and safety assessment is essential to determine whether the jet skis procured without sufficient consideration of environmental and safety standards can be operated, or whether alternative solutions should be pursued to prevent their potentially disruptive impacts within Aqaba Marine Reserve.

3.2.3. Integrity of Online Monitoring Systems and Reliability of Scientific Data

Two online monitoring systems already exist on the Jordanian sector of the Gulf of Aqaba and UNDP Jordan is in the process of procuring two more. The expansion of online monitoring infrastructure is a positive development in principle. However, adding new monitoring stations without rigorous cross-calibration between the stations and validation against certified laboratory measurements may introduce risks of inconsistent or misleading data.

Given that monitoring outputs may inform environmental assessments and regulatory decisions, ensuring robust quality assurance and quality control "QA/QC" protocols is essential.

3.2.4. Governance and Operational Delays: Blue Economy Innovation Center.

The Program Document "pp. 37 and 50" outline the immediate establishment of the Center for Sustainable Blue Economy Innovation within Aqaba Development Corporation "ADC", which was fully involved and prepared to host the entity during the 2023 preparation phase. The Center is scheduled to incubate 4 -5 projects in its first year and 8 projects annually thereafter. The present implementation status has dramatically deviated from this, as is outlined below:

- Operational Stagnation: After more than two years into the Program's lifecycle, the Center was not operational. A launch event was held in late January 2026, yet it lacked critical operational details regarding the Center's physical location, staffing structures except for a director, or concrete publicly known operating mechanisms.
- Institutional Opportunity Loss: Due to the absence of functional Governance and Projects Selection Committees "Item3.1. Bullet 2", the Center is unlikely to review or support any projects until late 2026. This delay represents an institutional failure to realize an estimated pipeline of 15 to 20 community-focused coral reef positive investment projects, meaning considerable expected socioeconomic benefits have been delayed or more realistically lost. The Program's Inception Phase of 1.5 years at a budget of about 1.5 million USD has been extended for 1.5 years more, meaning about 15% of the Program's budget is managed in 50% of the Program's duration. Even if the 1.5 years additional period is assumed to be added to the Program's duration, this is 15% of the budget ambition in 40% of the Program's duration.
- Altered Setup and Diluted Oversight: The structural setup of the Center has been dramatically altered from its reviewed and local community consulted design. Notably, a consultant who has been awarded multiple consecutive consultancies related to the Centre appears now to be installed

as the Center's Director. Concurrently, the status and fate of the independent Projects' Selection Committee, which by design requires local community and investor mechanisms representation to ensure transparent governance remains ambiguous, thereby risking the local community and investors' benefits and weakening accountability. The Director has recently established a LinkedIn page for the Centre: Blue Economy Centre Aqaba https://www.linkedin.com/company/blue-economy-center-for-innovation-beci/about/ claiming it has this web page: https://www.blueeconomycenter.com/, which appears to be empty.

3.2.5. Professional Conduct and Institutional Representation

Following the Centre of Blue Economy promotional launch in January 2026, marking the start of the Program's third year, public communications by certain staff and consultants on professional networks "e.g., LinkedIn" featured highly exaggerated, individualized branding "Plate 2".

While visibility is important, maintaining professional, institutionally grounded communication is equally critical. Overly promotional representations may undermine institutional credibility; diminish recognition of prior local and national efforts, and conflict with the principles of community stewardship central to the blue economy.

4. Conclusion

The concerns outlined herein are presented with the objective of strengthening the credibility, effectiveness, and long-term social and environmental benefits of these strategically important Program and Project. Accordingly, I respectfully request consideration of adequate measures to ensure:

- Full compliance with environmental, social and safeguards
- Meaningful inclusion of the local expertise and stakeholders
- Transparent and accountable governance that actively supports national expertise, the scientific community, and local stakeholders, ensuring their meaningful participation and enabling their voices to be effectively heard
- Scientific rigor assuring adequate compliance with the Social and Environmental Standards in all interventions

Addressing these points is essential to achieving the intended environmental and socio-economic benefits of these investments, while safeguarding the unique and globally significant ecosystems of the Gulf of Aqaba.

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Thank you for your kind consideration

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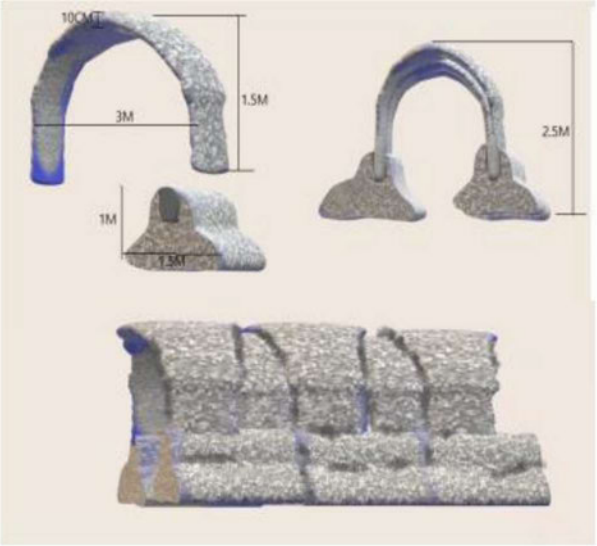
Please see Plates 1 and 2 below

Plate 1. Locations. Shapes and Area of 9000m2 Concrete Artificial Reef Tender to deploy at Aqaba Marine Reserve without any Scientific or ESIA Studies



Site 1: The Cave Area: Located approximately 70 meters from the shoreline at depths ranging between 5–10 meters, with a total area of 3,000 m².

Site 2: Visitor Center Shoreline Area: Located approximately 50 meters from the shoreline at similar depth conditions, with a total area of 6,000 m².

TITLE

Supply of design, fabrication, transport, and underwater deployment of artificia

REF NO

UNDP-JOR-00613

UNDP OFFICE/COUNTRY

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PROCESS

ITB - Invitation to bid

DEADLINE

30-Dec-25
04:00 AM (New York time)

POSTED

04-Dec-25
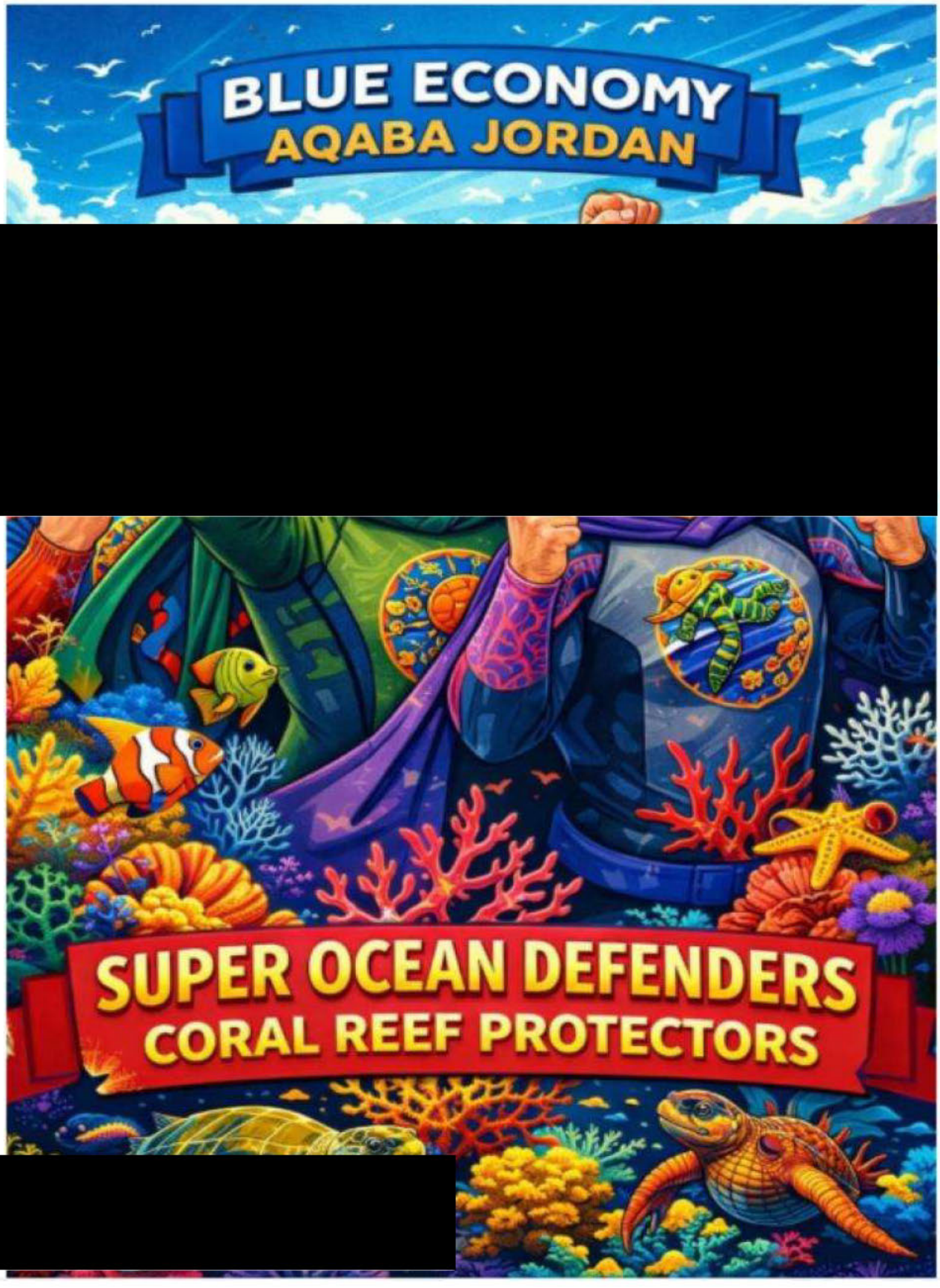
Plate 2. UNDP Jordan Staff and Consultants' Superman Style Coral Protection, Undermining Prior Work and the Blue Economy Socioecological Principles