

**United Nations Development Programme –
OAI, Social and Environmental Compliance Unit**



**ELIGIBILITY DETERMINATION:
Complainant: Confidential
Regarding UNDP's Enhancing Coastal Ecosystem Biodiversity and Resilience in the Gulf of Aqaba
Jordan AND Gulf of Aqaba Resilient Reefs Programme**

**Case No. SECU0029
Date: 23 October 2026**

Basic Data

Case No.	SECU0029
Category of Non-Compliance:	Social and Environmental
Location:	Jordan
Date Complaint received:	22 June 2026
Source of Complaint:	Confidential
Eligibility assessment conducted by:	Richard Bissell, Lead Compliance Officer
Compliance Officer assigned:	Erica Bach, Compliance Officer
Other investigators assigned:	Peter Boldt, Compliance Analyst
Related Case(s):	N/A

I. Overview

1. On 22 June 2026 the Social and Environmental Compliance Unit (SECU) registered a complaint from a confidential complainant regarding UNDP's Enhancing Coastal Ecosystem Biodiversity and Resilience in the Gulf of Aqaba Jordan project (also referred to as EmBRACE) and Gulf of Aqaba Resilient Reefs Programme (collectively, the Aqaba interventions).¹
2. The complainant alleges that the Aqaba interventions may not be aligned with UNDP's Social and Environmental Standards (SES). Specific concerns raised include: limited local community inclusion and benefit-sharing; deployment of large concrete artificial reef structures within the Aqaba Marine Reserve (AMR) under a December 2025 tender without scientific feasibility assessment or a formal Environmental and Social Impact Assessment (ESIA); lack of impact assessments relating to the anticipated use of 'jet ski' watercraft for marine patrols; introduction of online monitoring systems that, if not properly calibrated with existing systems, could result in misleading data; delayed operationalization and ambiguity in the governance of the Centre for Sustainable Blue Economy Innovation (BECI); and overly promotional public communications about the Aqaba interventions by UNDP staff and consultants, which may undermine prior local and national sustainability efforts. The complaint highlights the need for adequate social and environmental safeguards, meaningful stakeholder inclusion, transparent governance, and scientific rigor across both of the Aqaba interventions. Following registration of the complaint, SECU sent a documentation and information request to the Jordan Country Office (CO). In its reply, the CO referenced the Moderate Risk ratings and noted that the CO proactively escalated the EmBRACE project to "High Priority for Risk Mitigation" at the corporate level, and provided extensive documentation relating to the Aqaba interventions, including signed Project Documents, work plans, budgets, progress reports, social and environmental assessments, records of consultations and operationalization of grievance mechanisms, procurement details and additional information.
3. As required by SECU's Investigation Guidelines² this memorandum provides SECU's assessment of whether the complaint is eligible for a compliance investigation. SECU has determined that the complaint is not eligible for a compliance investigation.

II. Project Details

4. The complaint concerns the Enhancing Coastal Ecosystem Biodiversity and Resilience in the Gulf of Aqaba Jordan project (ID: 01002350)³ and the Gulf of Aqaba Resilient Reefs Programme (ID:

¹ SECU posted the complaint in its case registry, available at <https://secu.info.undp.org/case/secu0029>.

² Available at <http://www.undp.org/content/undp/en/home/librarypage/operations1/secu-investigation-guidelines/>.

³ See <https://open.undp.org/projects/01002350>.

01001763)⁴, two linked UNDP-implemented interventions on Jordan's Gulf of Aqaba coastline, hosted within the Aqaba Special Economic Zone (ASEZA).

5. The Enhancing Coastal Ecosystem Biodiversity and Resilience in the Gulf of Aqaba project applies Nature-Based Solutions to strengthen coastal biodiversity, including native-plant introduction around rockfill dams, deployment of concrete artificial reef units, an orphan-coral nursery, clean-up dives, and ecotourism. UNDP's transparency portal describes the project as a "comprehensive project [that] promises to have far-reaching benefits for both the environment and the socio-economic landscape of the region. The proposed project is intricately aligned with various national and international strategies and policies, including, but not limited to: Jordan's Economic Modernisation Vision Executive Program 2023 – 2025, the Jordanian National Biodiversity Strategy and Action Plan, ASEZA's DRR, the Convention of Biological Diversity (CBD) and its recent Kunming-Montreal Global Biodiversity Framework, the United Nations Decade on Ecosystem Restoration, and other pertinent national and international frameworks."⁵
6. The Global Fund for Coral Reefs (GFCR)⁶-funded Gulf of Aqaba Resilient Reefs Programme aims to protect coral-reef climate refugia at three priority sites, advance reef-resilience science, and implement finance mechanisms to ensure the sustainable financing of Marine Protected Areas (MPAs) and Other Effective Area-Based Conservation Measures (OECM) that harbor critical coral reef ecosystems; this includes through a Centre for Sustainable Blue Economy Innovation (BECI), focusing on blended finance solutions for businesses and projects in these sectors that support coral reef conservation, community livelihoods, and enhanced community resilience to climate change.⁷

III. Determination of Eligibility

7. To be eligible for a compliance review, a complaint must: (1) Relate to a project or programme supported by UNDP; (2) Raise actual or potential issues relating to compliance with UNDP's social and environmental commitments; and (3) Reflect that, as a result of UNDP's noncompliance with its social and environmental commitments, complainants may be or have been harmed.⁸
8. **Criterion 1: The complaint relates to a project or programme supported by UNDP.** The complaint raises concerns that directly relate to implementation of the UNDP-supported Aqaba

⁴ See <https://open.undp.org/projects/01001763>.

⁵ See <https://open.undp.org/projects/01002350>.

⁶ See <https://globalfundcoralreefs.org/>.

⁷ See Project Document, available at <https://open.undp.org/projects/01001763>.

⁸ SECU Investigation Guidelines, available at:

https://www.undp.org/sites/g/files/zskgke326/files/publications/SECU%20Investigation%20Guidelines_4%20August%202017.pdf.

interventions, as specified on the UNDP Transparency Portal.⁹ The complaint meets the first criterion under Section 8.1.

9. **Criterion 2: *The complaint raises actual or potential issues relating to compliance with UNDP's social and environmental commitments.*** UNDP is required to ensure compliance with its social and environmental commitments, including the SES, for all activities that are funded through UNDP accounts. Based on the issues raised in the complaint, the potential compliance issues primarily relate to stakeholder engagement, assessment and management of social and environmental risks, and transparency. Project-level standards implicated by the complaint are SES Standard 1: Biodiversity Conservation and Sustainable Natural Resource Management and Standard 3: Community Health, Safety and Security.
10. **Issue i) Community inclusion and benefit-sharing:** According to the SES, “UNDP ensures meaningful, effective and informed participation of stakeholders....Stakeholder engagement is an ongoing process that may involve, to varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and meaningful participation, dispute resolution and grievance redress, ongoing reporting to affected communities and stakeholders, and inclusion of stakeholders in monitoring and evaluation.”¹⁰ Further, meaningful, effective and informed stakeholder engagement and participation is undertaken with the intention to build and maintain a constructive relationship with stakeholders over time and to avoid or mitigate any potential risks in a timely manner. Consultation processes seek to identify priorities of stakeholders and provide them with opportunities to express their views at all points in project decision-making on matters that affect them and allow project teams to consider and respond to them. Engagement is to be free of external manipulation, interference, coercion, and intimidation, and address social and environmental risks and adverse impacts, and the proposed measures and actions to address these.¹¹
11. SECU is of the view that the complaint does not provide a sufficient basis to substantiate possible shortcomings in community inclusion, giving rise to a potential failure by UNDP to comply with SES stakeholder engagement requirements. The principal stakeholder engagement allegation is that local community participation has been limited and that local stakeholders have not been sufficiently represented in governance and benefit-sharing arrangements. However, the complaint does not identify specific affected stakeholders who were excluded, describe any consultation process from which those stakeholders were prevented from participating, or indicate how UNDP failed to undertake stakeholder engagement activities required under the SES. Rather, the complaint primarily expresses concerns that participation has not met the complainant's expectations regarding the degree of local influence in governance and decision-making processes.
12. Moreover, information available to SECU indicates that stakeholder engagement planning and implementation measures were undertaken, including the development of stakeholder engagement frameworks, consultation activities, stakeholder meetings and focus groups, attendance records for stakeholder engagement events, gender and social inclusion planning

⁹ See <https://open.undp.org/projects/01002350> and <https://open.undp.org/projects/01001763>

¹⁰ SES, Part C, para. 18.

¹¹ SES, Part C, para. 20.

measures, and the establishment of grievance redress mechanisms (GRMs) and related procedures. Documentation notes the existence of structured mechanisms for stakeholder consultation and participation. While SECU expresses no view at this stage on the adequacy or effectiveness of any particular engagement activity, the information provided by the complainant does not provide indications that UNDP failed to undertake stakeholder engagement in a manner required by the SES.

13. **Issue ii) Social and environmental assessments relating to artificial reefs and watercraft:** The SES require that social and environmental risks be identified through UNDP's Social and Environmental Screening Procedure (SESP) and assessed in a manner proportionate to the risks identified, with a comprehensive ESIA required for High-Risk activities and appropriately scaled assessment and management measures for Moderate Risk activities. Assessment is to be undertaken as early as possible, and activities that may cause adverse impacts are not to be carried out until assessment is complete and management measures are adopted.
14. The complainant alleges that a December 2025 tender proposes deployment of concrete artificial reef structures over approximately 9,000 m² at two sites within the AMR without a scientific feasibility assessment or a formal ESIA, and that four electric watercrafts were procured for marine patrols without a structured environmental and safety assessment.
15. An Environmental and Social Management Plan (ESMP) has been prepared, which covers artificial reef fabrication and deployment, and provides that structures are to be placed only at officially approved sites on degraded or sparsely inhabited sandy seabed, avoiding live coral reefs and seagrass beds, subject to pre-deployment ecological verification, approved engineering designs and ASEZA/AMR authorization. The ESMP notes that final locations will be confirmed following completion of baseline ecological assessments, engineering design and regulatory approval.
16. Other documentation provided by the CO indicates that a range of social and environmental assessment activities have been undertaken in relation to the artificial reef component, including an August 2025 Preliminary Rapid Site Assessment, a seagrass baseline assessment and a detailed biodiversity assessment which was scheduled for completion before 30 August 2026.
17. Based on this information, the assertion that artificial reef structures have been or will be placed within the Marine Reserve without any assessment is not substantiated. Available information indicates that a staged assessment process is in place, the preliminary stage has been completed and documented, and the further prescribed stages are pending. SECU does not express any view on the technical adequacy of any studies that have been completed or are underway, on the technical merits of artificial reef deployment as a conservation measure, or on the suitability of certain watercraft for patrol operations (on the latter point, SECU notes that practices vary across jurisdictions).
18. On this basis, SECU does not find any indications of potential non-compliance with SES requirements. SECU notes that the CO intends to ensure that deployment does not proceed in advance of those steps, and SECU encourages the CO to ensure disclosure of the rapid assessment and the detailed biodiversity assessment upon completion, together with the applicable

mitigation measures, and to provide stakeholders with an opportunity to comment and inform outcomes of the studies where appropriate.

19. **Issue iii) Online monitoring systems:** As described above in Issue ii), the SES requires adequate identification, assessment and management of social and environmental risks.
20. The complaint notes the Aqaba interventions will introduce two new online monitoring systems, adding to the two which already exist for the Jordanian sector of the Gulf of Aqaba. The complaint explains that, to ensure the integrity of data and related decision making, the monitoring systems require rigorous crosscalibration. The complainant has provided no additional information regarding the basis for their belief that appropriate cross calibration will not be undertaken in the context of the Aqaba interventions. Accordingly, SECU does not find that any potential indication of noncompliance is established.
21. **Issue iv) Governance and other arrangements for the BECI:** The SES requires UNDP to maximize social and environmental benefits, but also to identify, assess, avoid, minimize, mitigate and manage adverse impacts associated with supported activities, including through effective stakeholder engagement and monitoring.¹²
22. Under the Gulf of Aqaba Resilient Reefs Programme, BECI is to play a role in identifying, incubating and facilitating investment in reef-positive enterprises. Its governance arrangements form an integral part of the programme's social and environmental management system. While the ProDoc describes the Centre's institutional structure and commercial support functions, it provides comparatively little detail regarding the governance mechanisms through which social and environmental considerations will be integrated into enterprise selection, technical assistance, investment facilitation and ongoing oversight. In particular, available documentation does not explain how supported enterprises will be screened against social and environmental criteria, how potential impacts on biodiversity and ecosystem services will inform decision-making, or how social and environmental performance will be monitored as enterprises progress through the Centre. Nevertheless, the CO provided SECU with information demonstrating progress in the development and governance structures of the Centre, related stakeholder engagement, and an initial call for proposals for support through the Centre, which is responsive to the concerns raised in the complaint about operational delays and ineffective governance arrangements. Based on its review, SECU is unable to determine indications of potential noncompliance with the SES such that further investigation would be warranted.
23. **Issue v) Project promotion:** Promotional activities of projects may raise SES concerns where they materially affect the quality of stakeholder engagement, transparency, or social and environmental risk management - for example, by presenting an incomplete picture of foreseeable risks and trade-offs, creating unrealistic expectations regarding project benefits, or impairing stakeholders' ability to participate in project decision-making on an informed basis.¹³
24. Based on a review of information provided in the complaint, which consists of a social media post by the CO promoting its role in supporting the Aqaba marine environment, and in consideration

¹² SES, Part C, paras. 11-17.

¹³ SES, Part C, paras. 18-20

of the extensive stakeholder engagement and social and environmental assessments provided by the CO, SECU's view is that the threshold for potential noncompliance with the SES is not met.

25. In consideration of the above, SECU considers that the complaint does not raise issues of compliance with UNDP's commitments sufficient to warrant moving forward with a compliance investigation. The second criterion under Section 8.1 is not met.

26. **Criterion 3: *The complaint reflects that, as a result of UNDP's noncompliance with its social and environmental commitments, complainants may be or have been harmed.*** The complainant has asserted that they have longstanding professional and scientific involvement in relevant fields of study and operations to the Aqaba interventions. While the complainant's assertions demonstrate a close connection to the subject matter of the complaint and explain the basis upon which the concerns are raised, these assertions alone do not identify actual or potential harm to the complainant arising from the alleged non-compliance. Accordingly, the assessment of this criterion depends on whether the complaint and related documentation and information identify specific adverse effects that the complainant experienced or may experience as a result of the alleged non-compliance. Based on the available record, SECU is unable to establish a sufficient nexus between any potential non-compliance of the Aqaba interventions with SES requirements and actual or potential harm to the complainant.

27. SECU considers this criterion not met.

IV. Conclusion and Next Steps

28. As the eligibility criteria are not met, the complaint has not been found eligible under SECU's procedures and SECU will not proceed to initiate a compliance investigation and will close the case. This outcome is based on the specific concerns raised by the complainant and on the information available to SECU regarding implementation of the Aqaba interventions as of the date of this Eligibility Determination. SECU has not made a finding that the Aqaba interventions are in compliance with the SES and SECU does not express a view on matters not raised in the complaint. Accordingly, this determination does not preclude SECU from addressing new complaints or assessing new information from affected individuals or communities concerning the Aqaba interventions.