

Policy Paper

The System of Agricultural Holdings in Jordan: Institutional Challenges and
Recommendations for Legislative Reform

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CONTENTS

Executive Summary	2
Introduction	4
General Context	4
Methodology	6
Legal Analysis:	7
First: Shift in the Definition of Agricultural Holdings: From Early Registration Form to Certificate	7
Second: Legal Violations and Their Implications	7
Third: Farmers' Dissatisfaction with Agricultural Certificates	8
Fourth: Conflicts Between Agricultural Holdings and Other Official Registers.....	9
Legal Summary:	9
Analysis of Institutional Practices in Agricultural Holding Registration	10
First: Divergence of the System from Its Original Institutional Purpose	10
Second: Discrepancy Between the Legal Registration Period and Actual Practice	10
Third: Redundant Document Requests and Weak Implementation of Electronic Linkage.....	11
Fourth: Significant Variability Across Directorates and Staff.....	12
Fifth: Weaknesses in Field Inspection Mechanisms and Inconsistent Implementation	12
Sixth: Requiring Signatures from All Shareholders Contrary to Civil Law	13
Seventh: Bank Institutional Non-Recognition of the Agricultural Holding Certificate and the Proof of Income Gap	13
Conclusion of the Analysis of Institutional Practices	13
Recommendations	16
Conclusion.....	20
References	21

Executive Summary

This paper examines the state of agricultural holding (AHs, hereinafter) registration in Jordan, a key regulatory instrument in the agricultural sector intended to support agricultural planning and policymaking through the development of an accurate national database. Historically, the agricultural holdings system was designed as a tool for data development and control. However, current practices reveal a substantial gap between the legal framework and implementing instructions, on the one hand, and actual practices within the directorates of agriculture, on the other. As a result, the agricultural registry—originally conceived as a statistical and planning instrument—has increasingly evolved into a bureaucratic administrative burden, affecting more than 68,000 farmers and approximately 87,000 agricultural holdings registered in the Ministry of Agriculture’s electronic system.

This paper employs a mixed analytical approach, integrating a review of relevant laws—including the Agriculture Law, Civil Law, investment legislation, and electronic transactions—with an analysis of the 2022 Instructions on Registering Agricultural Holdings. It also includes qualitative interviews with farmers, legal experts, and officials from the Ministry of Agriculture and its departments. The legal and institutional review uncovers several flaws in the instructions. First, the definition of agricultural holdings in the instructions does not align with the legal definition provided in the Agriculture Law. Second, although the instructions specify a five-year validity for the agricultural holding certificate, the registration is actually renewed annually. Lastly, the instructions require signatures from all shareholders for renewal, which conflicts with Civil Law provisions that mandate signatures from the majority of owners or their authorized representatives.

Implementation faced several practical challenges. Firstly, registration documents must be submitted annually in hard copy, even though the data are already stored in the national electronic system. Procedures differ greatly among agricultural directorates, and there are no standardized timelines for completing registration processes. Field inspections are also weak and inconsistently enforced. Moreover, the agricultural holding certificate has become a mandatory requirement for accessing government services, especially for recruiting agricultural workers. This change shifts the registry's original purpose of statistical and planning functions, increasing administrative burdens on Ministry of Agriculture directorates without offering equivalent statistical benefits.

The comparative table underscores gaps between the legal framework, the implementing instructions, and actual practice. These gaps appear in various areas, including the definition of agricultural holdings, the validity period of certificates, documentation requirements, field inspection procedures, joint property management, and data usage. Together, these inconsistencies weaken the Ministry of Agriculture's ability to build a coherent agricultural information system. They also harm the agricultural work environment. Farmers face higher costs and increased administrative effort. At the same time, the effectiveness of the agricultural services system is reduced.

The paper presents two sets of recommendations: The first is policy related and includes accepting the holding registration certificate as an official document for the purposes of the Ministry of Labor, Social Security Corporation, and banks. They also suggest amending the instructions to align it with the agriculture law and the civil law, adopting the electronic signature as a replacement for notarized powers of attorney.

The second set of recommendations, which addresses procedural reforms, emphasizes: strict adherence to the five-year validity period and the linkage of each agricultural holding to an up-to-date digital profile; the development of an electronic verification mechanism for agricultural holding certificates; the standardization of field inspection procedures across all agricultural directorates; the establishment of clearly defined processing timelines not exceeding two working days per transaction; and the introduction of an error-flagging system to facilitate the correction of errors without disrupting or delaying service provision.

The paper concludes that reforming the agricultural holdings system is a key lever for strengthening agricultural governance, empowering farmers, advancing digital transformation, and restoring the agricultural registry to its original function as a planning and development tool in line with the Economic Modernization Vision, while simultaneously reducing the bureaucratic burden on Jordan's agricultural sector.

Introduction

The agricultural sector is a cornerstone of Jordan's economy, contributing not only to food security and self-sufficiency but also serving as a major source of employment and a sustainable livelihood for rural communities. A study by the Department of Statistics indicates that the sector accounts for 23.5% of the country's total economic activity, encompassing forward linkages such as the food industry, restaurants, and hotels, as well as backward linkages, including production inputs, water, and energy, within the broader economic cycle. These findings underscore the significant and unprecedented economic contribution of the agricultural sector in Jordan. Nevertheless, despite its strategic significance, the sector is confronted with complex institutional, legislative, and regulatory challenges, stemming both from the gap between policies and laws and from shortcomings in practical and administrative implementation on the ground.

These gaps are particularly evident in the registration of crop-based agricultural holdings, which are intended to function as a tool for collecting, organizing, and analyzing agricultural data, and for validating such information prior to publication in accordance with existing legislation. In practice, however, implementation is complicated by overlapping legislative and regulatory frameworks and inconsistencies in the legal definition of agricultural holdings. Furthermore, insufficient compliance with applicable laws, regulations, and instructions has led to the accumulation of procedural and policy-related bureaucracy, which impedes agricultural investment and constrains economic growth.

General Context

The concept of "agricultural holding" was first formally introduced into Jordan's legislative framework in 1974, when the then-Minister of Agriculture, Marwan Al-Hamoud, issued a decision published in the Official Gazette pursuant to Article 80 of the 1973 Agriculture Law. Although the original law is no longer in force, the decision concerning agricultural holdings remains legally effective. At the time, agricultural holdings were issued in the form of an official "certificate," produced in four copies: one for the provincial Directorate of Agriculture, one for the agricultural extension officer, a third for the director of the local agricultural cooperative (if one existed), and the fourth for the landowner or their authorized representatives. These certificates were stamped with the Directorate's seal and assigned sequential numbers for each province. While they did not confer any legal rights on farmers, they served as a prerequisite for accessing services from the Ministry of Agriculture; farmers who did not possess the certificate were denied any services provided by the Ministry or other institutions operating in support of agriculture, in accordance with Article 11 of the decision.

The historical context suggests that the primary purpose of this certificate was to establish an accurate national database on cultivated lands, crop types, tree ages, and production locations. This measure was closely tied to the political and national security conditions of the 1970s, when Jordan faced a volatile regional environment

marked by conflict and blockade, making accurate agricultural information essential for ensuring food security. In line with this objective, Article 5 of the decision mandated that each landowner, or their authorized representative, submit the agricultural forms within specified timeframes: in January for permanent crops, buildings, machinery, and livestock, and within one month of planting seasonal crops. Noncompliance was deemed a violation of the decision's provisions, further reinforcing the state's effort to maintain a comprehensive and accurate national agricultural database.

Building on this historical framework, the concept of agricultural holdings has since evolved. According to the Ministry of Agriculture, approximately 87,000 agricultural holdings are currently registered. Article 2 of the Agriculture Law defines an agricultural unit as a production unit managed under a single management, either fully or partially, for crop or livestock production, and defines the **holder** as the natural or legal person responsible for managing and supervising the holding. Furthermore, Article 4 empowers the Minister of Agriculture to issue instructions regulating the procedures for surveying agricultural holdings across the Kingdom, overseeing the collection, analysis, organization, and validation of agricultural data and statistics prior to their publication, and requiring relevant entities to provide the Ministry with any information related to the agricultural sector.

Despite these legislative developments, the agricultural holdings registration system in Jordan continues to exhibit significant gaps between the legal framework and its implementation. These gaps are evident in the understanding of the certificate's purpose, the management of the data it generates, and the procedures followed by both farmers and agricultural directorates. Originally intended as a tool for data management and policy guidance, the agricultural holding certificate has effectively become a prerequisite for accessing services, without a clear legal basis, simplified procedures, regular data publication, or an integrated digital system. Consequently, farmers; estimated at approximately 68,000 by the Ministry of Agriculture; face repeated requests for paper-based government documents despite the existence of a national electronic linkage, cumbersome bureaucratic renewal procedures, and persistent inconsistencies between official instructions and actual practices in the field.

Collectively, these challenges impose undue financial and administrative burdens on agricultural directorates and farmers, while limiting the Ministry's ability to develop an accurate database and deliver effective services. This, in turn, hinders the achievement of the developmental and economic objectives outlined in the Economic Modernization Vision, which prioritizes the agricultural sector for its role in increasing national output, generating employment opportunities, and ensuring food security.

This paper aims to examine the current state of agricultural holdings in Jordan by reviewing the relevant legal and regulatory framework and associated administrative practices, and by analyzing the discrepancies between formal provisions and actual implementation. It seeks to propose institutional and legislative reform pathways that would transform agricultural holding certificates into tools for empowering and

incentivizing the agricultural sector, rather than leaving them as a bureaucratic burden.

Methodology

This paper employs a mixed analytical approach, combining institutional and legal analysis with qualitative interviews, and drawing on comparative analysis between de jure provisions and de facto practices (De facto).

The study was conducted in four main stages:

1. Legal and Regulatory Review: Relevant legislative and regulatory laws concerning agricultural holdings; including the Agriculture Law, Social Security Law, investment and environmental legislation, and agricultural labor regulations, were analyzed to identify legal inconsistencies, gaps, or overlaps in jurisdiction.
2. Field Interviews: Qualitative interviews were conducted with three key groups:
 - Legal experts and legislative specialists, to evaluate the legal framework governing agricultural holdings.
 - Farmers and agricultural investors, to document their experiences with registration processes and administrative practices.
 - Ministry of Agriculture officials and directorate staff, to understand implementation challenges and monitoring systems.
3. Analysis of Institutional Practices:

The study assessed the intended objectives of agricultural holdings registration and evaluated the effectiveness of current instructions in achieving these objectives. This included estimating the costs of issuing certificates annually versus every five years, measuring average transaction completion times, identifying redundantly requested documents, and examining the discretionary authority of staff.
4. Comparison between Legal Provisions and Practice:

A systematic comparison was conducted between the stipulations of the laws and instructions regarding registration authorities, duration, and procedures, and actual practices in the field, in order to identify implementation gaps and bureaucratic obstacles.

Legal Analysis

The Instructions on Registering Crop-Based Agricultural Holdings (g/14 of 2022) were issued in the Official Gazette pursuant to Article (4) of the Agriculture Law and its 2015 amendments. Article 4 stipulates: "The Minister shall issue instructions regulating the procedures for surveying agricultural holdings across the Kingdom. The Ministry shall also cooperate with relevant entities in the collection, analysis, organization, and validation of agricultural data and statistics prior to their publication in accordance with applicable legislation. The Ministry may carry out these procedures in cases

where such information and data are not available in a timely manner, and relevant entities are required to provide the Ministry with any information or data pertaining to the agricultural sector."

Despite these legal provisions, the registration system continues to face significant legal and administrative challenges, as revealed by the comparative analysis of legal provisions and field practices presented in this study. Practical experience demonstrates a persistent gap between the formal instructions and their implementation, highlighting issues ranging from the evolving definition of agricultural holdings to the broader implications of current procedures on legal equity, the agricultural sector, and the national economy.

First: Shift in the Definition of Agricultural Holdings: From Early Registration Form to Certificate

Historically, agricultural holdings were documented through a simple paper-based registration form, which was later revised and ultimately formalized as a "certificate." Despite this shift, the certificate does not confer legal rights to farmers. On the contrary, failure to obtain it imposes additional financial and administrative burdens, undermining principles of legal equity. This reflects that the current instructions provide limited protection for farmers and contribute to the growing complexity of legal and administrative procedures.

Second: Legal Violations and Their Implications

The agricultural holding certificate has effectively become an additional instrument for imposing financial burdens on farmers. Farmers are required to submit numerous updated documents and navigate lengthy bureaucratic procedures to renew the certificate annually, in direct contradiction to Instructions No. (Z/14) of 2022, which were issued to regulate the issuance of the agricultural holding certificate. Specifically, Article 10(a) stipulates that: "The registration shall remain valid for a full period of five years." This violation generates both financial and administrative strain on farmers and on the Ministry of Agriculture directorates, due to the cumbersome procedures involved in issuing the certificate.

When considering what is stated in Article (7) of the instructions, which specifies the documents required to be brought to issue the possession certificate, we find a violation of what is stated in Article (37) of the Investment Environment Law of 2022, which defines the investor as: "A person who invests in the Kingdom in an economic activity in accordance with the provisions of the law, whether he is a Jordanian or non-Jordanian investor. Paragraph (c) of Article (37) stipulates that:" It is prohibited for the official entity to request the investor to submit any valid document issued by another official entity in the event of an electronic link between these two entities. "The violation is that the documents required to issue the certificate are available through electronic linking between ministries, including the Ministry of Agriculture, allowing the directorates to access the documents without the need to request them in paper form, provided that the service applicant is responsible for completing his papers correctly on the electronic linking system.

The continuous issuance of Qawashin and title deeds without real economic return reflects a waste of resources and is considered an unjustified financial burden on the national economy. The current instructions do not contribute to a sustainable benefit to the public treasury, but rather lead to the depletion of resources by irrationally linking agricultural tenure documents with other government services. This increases costs and disrupts economic efficiency in the agricultural sector.

In addition to the above, Article (7) of the instructions states: "In the event that there are partners in the ownership of the land, a notary power of attorney must be submitted from the partners certified by the notary public or a lease contract duly certified.", which means that all the partners in the properties must sign the common property in violation of what is stated in Article (1033) of the Civil Code, which stipulates: " 1-The management of the common property shall be the right of the partners collectively unless otherwise agreed. 2- If one of the partners takes over the administration without objection from the rest, he shall be considered an agent for them" and also violates Article (1034) of the Civil Code, which stipulates:" 1-The opinion of the majority of the partners in the management of money shall be binding on all and the majority shall be considered as the value of the shares."

Although the Civil Law explicitly recognizes the managing shareholder as the legal representative of all other shareholders, holders of jointly owned land are frequently denied access to services from the Ministry of Agriculture, the Ministry of Labor, and the Social Security Corporation. This practice is often justified by the perceived difficulty of obtaining signatures from all shareholders, who may number in the hundreds, be residing abroad, or include deceased individuals whose estates have not yet been legally settled. Such procedures undermine principles of legal equity and sound administration, exacerbate social tensions, weaken a key productive sector, and contribute to the fragmentation rather than the consolidation of agricultural holdings. Furthermore, these practices are inconsistent with the objectives of the Economic Modernization Vision, which aims to simplify administrative processes and reduce bureaucratic burdens.

Third: Farmers' Dissatisfaction with Agricultural Certificates

The intended statistical purpose of the agricultural certificate, historically referred to as a "certificate," "card," or "registration form", is rendered largely ineffective when farmers or landowners are reluctant to engage with the government services linked to their holdings. Many farmers resist the financial and administrative burdens of obtaining these certificates unless they are compelled to do so for practical reasons, such as hiring migrant labor, purchasing feed or fertilizers, or accessing other forms of agricultural support. Even with tax exemptions on individual farmers' sales up to the first one million Jordanian dinars, uncertainty over legislative stability fosters hesitation in accurately reporting crop yields or livestock numbers. This reluctance is further reinforced by the cumulative impact of other significant obligations, including input taxes, income taxes, land fees, electricity charges, and social security contributions, which collectively heighten the perceived risk of full disclosure.

Fourth: Conflicts Between Agricultural Holdings and Other Official Registers

While Jordanian law clearly distinguishes between natural persons and legal entities, the agricultural holding has increasingly assumed a role that overlaps with other formal registers, including those of sole proprietorships, cooperative associations, and charitable endowments (Awqaf). In practice, the Ministry of Agriculture requires farmers to present their agricultural holding certificate as a prerequisite for obtaining a official letter directed to the Ministry of Labor to recruit migrant labor. This overlapping function creates some legal ambiguity, as no explicit law authorizes such a requirement. The resulting uncertainty undermines effective coordination among relevant stakeholders, complicates the regulation of agricultural labor, and amplifies the broader legal and administrative challenges confronting agricultural institutions.

Legal Summary

Current practices related to agricultural holdings in Jordan show a set of legal and administrative challenges that contradict the basic principles of legal justice, and impose an undue financial and administrative burden on farmers. Instructions, which were originally intended as a statistical tool have, in many cases, evolved into instruments of administrative overreach and misuse, reducing their effectiveness and negatively impacting the agricultural sector. The lack of coordination between government agencies, coupled with the absence of meaningful dialogue between farmers and policymakers, further exacerbates disorder within the agricultural system.

In addition, the absence of judicial interpretation of the terminology in the instructions along with the legal and tax complexities associated with agricultural holdings intensifies the problem, as farmers' demands are not seriously heard. As a result, farmers are compelled to comply with arbitrarily imposed requirements, undermining national production and harming the agricultural sector at large. Such issues highlight the urgent need for legal reforms, beginning with a comprehensive review of the instructions and the establishment of transparent and effective mechanisms that ensure legal justice and contribute to improving the agricultural work environment.

Analysis of Institutional Practices in Agricultural Holding Registration

The implementation of the 2022 Instructions on Registering Agricultural Holdings (Z/14) reveals a clear divergence between the formal legislative framework and the actual practices. This shifts the registry's original purpose of statistical and planning functions, increasing administrative burdens on Ministry of Agriculture directorates without offering equivalent statistical benefits.

First: Divergence of the System from Its Original Institutional Purpose

A system originally designed to map cultivated land and generate agricultural data for planning and policymaking. Article 4 of the Agriculture Law clearly establishes the registration of agricultural holdings as a tool to produce reliable data and statistics for the Ministry's planning processes. Yet, in practice, the agricultural holding certificate has become a mandatory gateway for accessing a range of services, including work permits, technical support, and collective pest control programs, as noted by the Director of the Plant Production Directorate.

This divergence has shifted the registry's role from a knowledge-based instrument to a procedural mechanism for service regulation. The resulting surge in requests has congested directorates and undermined the ability to collect accurate agricultural data. Additionally, the annual renewal is misaligned with the multiple agricultural seasons and fails to accommodate the rapid turnover of seasonal crops, further diminishing the system's effectiveness.

Second: Discrepancy Between the Legal Registration Period and Actual Practice

A five-year registration period mandated in the instructions, yet annual renewal remains the de facto practice. Article 10(a) of the Instructions on Registering Agricultural Holdings establishes that registration should be valid for five full years. In reality, however, directorates require farmers to renew their certificates every year. During an interview, the Director of the Plant Production Directorate explained: "The Prime Ministry initially directed that certificates be issued for five years so that farmers would not need to return annually. We began implementing this approach, but challenges arose with holdings that require professional licenses or company registration- such as plant nurseries- which are licensed on an annual basis. Consequently, we reverted to annual renewal. Even for unchanged holdings, such as olive or fruit trees, ownership may change, and from the Ministry's perspective, yearly renewal ensures that the data remain up to date."

In practice, this approach generates a wide range of challenges. It constitutes an implicit violation of the instructions, which have not been formally amended, burdens hundreds of farmers with unnecessary renewals and additional costs, and undermines trust in the registry due to repetitive requests without substantive changes in agricultural reality. It also hinders the registry's statistical purpose. Farmers interviewed in Jerash, Mafraq, Zarqa, and Madaba indicated that a five-year renewal cycle, with updates made only when ownership changes, would be more practical,

increase compliance rates, and reduce avoidance behavior among those reluctant to engage with directorates due to "bureaucratic hurdles".

Third: Redundant Document Requests and Weak Implementation of Electronic Linkage

Despite the fact that all documents required for agricultural holdings (such as land title deeds, land plans, and national IDs) are issued by government entities connected through e-systems, directorates continue to request them in hard copy for every transaction. This practice contravenes Article 37(c) of the Investment Environment Law, which prohibits requiring investors to submit documents already available through e-system between government agencies.

Farmers collectively reported that the documents required for the agricultural holding certificate must be resubmitted annually in paper form, even when fully updated in the electronic system. This imposes additional effort and financial costs. Moreover, the same documents are repeatedly submitted to obtain a placement letter for foreign labor from the Directorate of Agriculture; the primary motivation for obtaining the agricultural holding certificate, and then again to the Ministry of Labor and Social Security. While the Ministry acknowledges that electronic submission "should suffice", its full implementation remains limited due to inadequate system integration.

The absence of a unified central agricultural data registry further accentuates the disconnect between the certificate's intended role and its practical function. Since all required documents are already issued by government agencies, the process could be fully handled electronically, significantly reducing administrative burdens for both farmers and Ministry staff, and aligning practice with the original purpose of the agricultural holdings system.

Fourth: Significant Variability Across Directorates and Staff

Excessive decentralization and broad discretionary authority characterize the implementation of agricultural holding registration. Interviews reveal stark contrasts in processing times and practices across directorates:

- In Mafrq: The transaction may take two days to complete.
- In Zarqa: A transaction can be finalized in as little as thirty minutes without a field inspection if the farmer benefits from staff favoritism or personal connections.
- In Jerash: issuing a certificate took ten days, despite staff assurances of shorter timelines.
- A farmer in Madaba noted that "the staff themselves delay the process" due to poorly organized inspection schedules.

These variations reveal an overreliance on favoritism and personal connections. Several farmers reported leveraging such connections to expedite transactions, highlighting the absence of standardized operating procedures, formal timelines, and staff accountability mechanisms. Such disparities undermine the predictability, fairness, and overall efficiency of the agricultural holdings system.

Fifth: Weaknesses in Field Inspection Mechanisms and Inconsistent Implementation

Field inspections, which are intended to ensure the accuracy of agricultural data, have in practice become fragmented and inconsistent. Interviews reveal a troubling pattern of selective enforcement:

- In Jerash, certificates are issued with **no** accompanying field inspection.
- In Zarqa, field inspections are frequently bypassed due to favoritism or personal connections, creating a reliance on informal relationships.
- In Madaba, field inspections required for labor placement approvals emerge as the **most cumbersome step, often delaying the** process by up to a week.

These disparities expose a critical fracture in the system's monitoring mechanisms, where the promise of precise, actionable data dissolves amid uneven practices. The quality of the agricultural registry suffers, and service delivery becomes unpredictable. Further compounding the issue, the Ministry intermittently relies on Google Maps to verify fruit-bearing trees, yet struggles to apply the same method to greenhouse operations, revealing a patchwork of technological adaptation that accentuates inconsistencies.

Sixth: Requiring Signatures from All Shareholders Contrary to Civil Law

Directorates require a notarized power of attorney signed by all shareholders for jointly owned land, despite Civil Law stipulating that decisions may be made by a majority. When questioned about this practice in reference to the legal text, the Ministry justified it by stating that "there is financial benefit derived from agricultural lands; therefore, all must sign to prevent disputes among all shareholders. In addition, it is difficult to rely on powers of attorney from banks due to previous cases of forgery."

This practice constitutes a clear overreach of the law and imposes additional costs and administrative burdens on farmers. Interviews with farmers highlighted the practical difficulties of obtaining signatures from all shareholders, especially when some are abroad. Under current practices, this can result in denying the managing shareholder access to services from the Ministry or other agricultural institutions.

Over time, such constraints contribute to the fragmentation of agricultural holdings into smaller, less viable units, undermining agricultural productivity and adversely affecting the growth of the agricultural economy.

Seventh: Bank Institutional Non-Recognition of the Agricultural Holding Certificate and the Proof of Income Gap

Despite its intended function as a formal record of agricultural activity, detailing production patterns, cultivated areas, and land use, the agricultural holding certificate remains largely invisible within the financial system. To date, it is not recognized by Jordanian banks as a valid instrument for proof of income. This institutional disconnect places individual farmers in a recurring cycle of administrative exclusion, particularly those who operate outside commercial or corporate registration frameworks. Interviews reveal that bank compliance departments consistently require additional documentation to verify both the nature of the farmer's occupation and the legitimacy of deposited funds, in line with regulatory and anti-money-laundering requirements. In the absence of recognized proof of income, farmers are compelled to retrace their steps back to agricultural directorates to obtain written attestations confirming that their earnings originate from agricultural activity.

Conclusion of the Analysis of Institutional Practices

The evidence drawn from documents and interviews underscores gaps between the legal framework, the implementing instructions, and actual practice. The agricultural registry has drifted from its original purpose of statistical and planning functions, becoming instead a mandatory prerequisite to accessing government services. This shift has intensified pressure on agricultural directorates and, in turn, weakened the system's ability to generate accurate and reliable agricultural data. The disjunction is further reflected in the inconsistency between the legally prescribed five-year validity of the certificate and the prevailing practice of annual renewal, a practice that imposes undue burdens on farmers and erodes confidence in the registry in the absence of a clear legal basis.

The findings also indicate that weak adherence to electronic integration systems and the continued reliance on hard copy documents perpetuate administrative complexity and run counter to national digital transformation legislation. At the same time, disparities among directorates, reliance on personal connections, and the absence of enforced timelines exacerbate inequalities in service delivery.

Taken together, these practices point to structural shortcomings in the implementation of the registration instructions, most notably the absence of procedural harmonization, weak digital governance, and the broad scope afforded to individual discretion. Addressing these deficiencies requires targeted regulatory and

digital reforms capable of restoring the agricultural registry to its intended role as a planning instrument and a cornerstone of sustainable agricultural development.

Table 1. Comparative Analysis of Legal Requirements and Field Practices in Agricultural Holding Registration

The table below delineates the principal gaps between the legal and regulatory framework governing agricultural holding registration and the practices actually observed within the directorates of agriculture. By presenting this comparative overview, the table seeks to shed light on core inconsistencies in implementation; ranging from procedural requirements and timelines to the fundamental role of the registry itself. This analysis provides a lens through which to understand the institutional complexities confronting farmers and the resulting impact on the accuracy, reliability, and utility of agricultural data.

Aspect	Law	Instructions	Actual Practice	Gap
Definition of Agricultural Holding	Article 2 of the Agriculture Law defines it as: "An agricultural production unit managed as a single entity, fully or partially, for crop or livestock production."	Article 1 of the Agricultural Holding Registration Instructions defines it as: "Any agricultural land larger than one dunum used for agricultural activity."	Practice follows the instructions	Contradicts the law, affecting the foundational basis for registering agricultural holdings.
Purpose of the Agricultural Holding Certificate	Collect agricultural data for planning (Article 4, Agriculture Law)	Organize registration procedures and issue the holding certificate	Certificate required to access services (work permits, pest control, etc.)	Deviates from original purpose; transforms the registry into a service control mechanism
Certificate Validity Period	Not specified; left to the instructions	5 full years (Article 10(A), Instructions)	Annual renewal for all holdings	Implicit violation of the instructions; increases administrative burden on farmers
Required Documents	Article 37(c), Investment Environment Law:	Article 7, Instructions specifies required	Documents requested in paper form	Duplication and non-digital procedures violate law; wastes time

	prohibits requesting documents already available through electronic system	documents	annually, also submitted to Ministry of Labor	and resources
Field Inspection	Not specified in the law	Central tool for data verification	Selective, inconsistent, or absent in some regions	Weak oversight; uneven data quality and service delivery
Processing Time	Not specified in the law	2 days as noted by the Director of Plant Production	Ranges from 30 minutes to 10 days depending on directorate	Lack of procedural standardization and absence of time limits; reduces predictability and efficiency
Joint Ownership (Shared Holdings)	Civil Law Article 1034: majority signature sufficient	Article 7: notarized power of attorney signed by all partners	Instructions applied as written	Procedural overreach; complicates management of shared holdings and increases administrative obstacles
Use of Data	Article 4, Agriculture Law: collect, analyze, publish data	Not specified in instructions	Data used internally only upon request	Undermines statistical purpose; diminishes developmental value of the registry

Recommendations

Building on the findings of this study, which highlight deep structural gaps between the laws and instructions on one hand, and the actual practices within the Directorates of Agriculture on the other, a set of targeted recommendations emerges. These encompass both policy-level and procedural-level measures. At the **policy** level, recommendations focus on clarifying, harmonizing, and modernizing the legislative and regulatory framework governing the registration of agricultural holdings. At the **procedural** level, they address the practical mechanisms of implementation within the directorates and the service delivery system experienced by farmers, aiming to streamline processes, reduce redundancy, and enhance transparency. This dual-track strategy seeks to restore the agricultural holding system to its original purpose; serving as robust instrument for planning and data collection, while improving its

efficiency to provide higher-quality services and reduce bureaucratic burdens for approximately 68,000 farmers. In doing so, it reinforces agricultural governance, aligns with the Economic Modernisation Vision, and contributes meaningfully to the strategic development of the agricultural sector in the Kingdom.

Based on the structural gaps identified between the legal provisions, the registration instructions, and the on ground practices within the Ministry of Agriculture, this paper proposes a set of policy-level reforms aimed at realigning the agricultural holding system with its original purpose while enhancing its efficiency and service quality. The key recommendations are as follows:

1. **Formal Recognition of the Agricultural Holding Certificate:** It is recommended that the agricultural holding certificate be formally recognized as an official document by the Ministry of Labor, the Social Security Corporation, and the Central Bank of Jordan. Such recognition would enable farmers to access services without the repetitive issuance and submission of documents, harmonize requirements across government agencies, and establish reliable proof of income for Jordanian banks. This reform would significantly reduce both the administrative and financial burdens on farmers and the Ministry.
 - Implementation can be achieved through a ministerial decision by His Excellency the Minister of Agriculture, formally instructing relevant authorities to recognize the certificate for the aforementioned intentions and purposes.
2. **Amendment of the Definition of Agricultural Holding:** The current definition of agricultural holdings in Article (1) of the Agricultural Holding Registration Instructions should be revised to align with Article (2) of the Agriculture Law, as statutory law prevails over ministerial instructions in Jordan's legislative hierarchy. Discrepancies in the definition undermine the legal foundation for registration and create ambiguity in practice.
 - Under Article (4) of the Agriculture Law, His Excellency the Minister of Agriculture has the authority to issue instructions to effectuate this alignment.
3. **Revision of Article (7) on Shared Ownership:** Article (7) should be amended to conform with Article (1033) of the Civil Law concerning the management of jointly owned property. Management or signature by the majority of shareholders, or by the shareholder legally responsible for administration, should suffice, thereby removing the requirement for all partners' signatures. This modification will eliminate procedural barriers that currently prevent thousands of farmers from accessing essential services.
 - Implementation falls under the authority of His Excellency the Minister of Agriculture pursuant to Article (4) of the Agriculture Law.
4. **Adoption of Digital Signatures for Proof of Management:** To facilitate administrative efficiency, Article (7) should allow the use of digital signatures

as an official alternative to notarized powers of attorney for verifying management of agricultural holdings. Integration with the “Sanad” digital ID system, in accordance with Article (4) of the Electronic Transactions Law, will streamline the management process and reduce reliance on court or notary interventions.

- Under Article (4) of the Agriculture Law, His Excellency the Minister of Agriculture has the authority to issue instructions to effectuate this alignment.
5. Elimination of Paper-Based Document Submission: Article (7) should be further amended to instruct directorates not to request hard copies of documents for issuing agricultural holding certificates. Instead, e-systems between government agencies should be employed, in alignment with Article (37/c) of the Investment Environment Law, which prohibits requesting documents already accessible through electronic systems. This measure will alleviate both financial and administrative burdens and advance the objectives of the Economic Modernization Vision.
- Under Article (4) of the Agriculture Law, His Excellency the Minister of Agriculture has the authority to issue instructions to effectuate this alignment.
6. Establishment of a Unified National Agricultural Holding Registry: A centralized, national registry should be created, interlinked with all relevant ministries and institutions, and reliant on up-to-date digital data verifiable in real time by government agencies. Such a system would enhance agricultural planning, reduce procedural duplication, and support sustainable sector development.
- Under Article (4) of the Agriculture Law, His Excellency the Minister of Agriculture has the authority to issue instructions to effectuate this alignment.

At the procedural level, the study recommends a series of measures to enhance operational efficiency within the agricultural directorates:

1. Compliance with the Five-Year Registration Period: Full adherence to Article (10) of the Agricultural Holding Registration Instructions, which stipulates a five-year registration validity, is imperative. A “Digital Holding Portal/Dashboard” should be developed on the Ministry’s website, allowing holders (farmers) to update information regarding changes in crops or cultivated areas and to upload supporting proofs. The Agriculture Directorate would verify these updates during routine field inspection visits. This approach eliminates the current practice of annual renewals, thereby alleviating financial and administrative burdens on both farmers and the Ministry.
- Implementation can be achieved through a ministerial circular directing directorates to respect the registration period and instructing the

Directorate of Digital Transformation and ICT to develop the digital interface for periodic updates and certificate applications.

2. Full Integration with Government E-Systems: Directorates should ensure that farmers are not asked to submit hard copies of documents that are already accessible through government interlinking systems, including land title deeds, land maps, identification cards, and professional licenses. The agricultural holding certificate should be seamlessly integrated with the “Sanad” platform, enabling relevant government agencies to access necessary documents directly. This measure reduces duplication, prevents administrative inefficiencies, and minimizes the burden on farmers.
 - Implementation can be achieved through a ministerial directive instructing directorates to cease requesting paper documents and ensuring that the Directorate of Digital Transformation and ICT maintains effective e-system connectivity. .
3. Electronic Verification Mechanism: An electronic verification mechanism should be introduced using QR codes or Digital Authentication Code, allowing government agencies, banks, and other institutions to authenticate the agricultural holding certificate independently of directorates. This will enhance the certificate’s credibility, strengthen its use as proof of income, and facilitate access to banking and financial services.
 - This recommendation shall be implemented under the directive of the Minister of Agriculture, instructing the Directorate of Digital Transformation and Information and Communication Technology to develop a certified QR code.
4. Standardization of Field Inspections: Field inspection procedures must be standardized through a detailed operations manual, identifying mandatory inspections and streamlining processes. The use of remote sensing technologies, including satellite imagery, Google Maps, and GIS, should be employed to minimize unnecessary visits and delays. This approach enhances efficiency, reduces operational pressure on directorates, and ensures timely processing of certificates.
 - This recommendation shall be implemented under the directive of the Minister of Agriculture, instructing the Directorate of Crop Production to issue a Field Inspection Procedures Manual and circulate it to all agricultural directorates across the Kingdom.

5. Establishment of Clear Timelines: Specific timelines should be established to ensure that certificate issuance does not exceed two working days. Monitoring and accountability mechanisms should be introduced within directorates to track delays and address variations across governorates.
 - This recommendation can be implemented by the Minister of Agriculture through coordination between the Directorate of Plant Production and the Directorate of Digital Transformation and ICT to ensure a fully digital and timely issuance process.
6. Addressing Data Updates and Disputes: The digital holding platform should include a system to flag inconsistent or erroneous data, allowing farmers to correct discrepancies without disrupting access to essential services.
 - This recommendation will be executed under the guidance of the Minister of Agriculture, directing the Directorate of Plant Production to establish a robust oversight framework for correcting errors, in close coordination with the Directorate of Digital Transformation and ICT to ensure effective management of all technical aspects.

Conclusion

The recommendations outlined in this study are situated within the broader national agenda to strengthen the agricultural sector and enhance its role in Jordan's economy. By improving procedural efficiency, enhancing the quality and reliability of agricultural data, reducing bureaucratic burdens on farmers, and facilitating investment, these reforms align closely with the objectives of the Economic Modernization Vision, which prioritizes the agricultural sector as a key driver of sustainable development. Implementing these recommendations represents a pivotal step toward creating a more equitable, effective, and adaptable agricultural holding system; one capable of supporting food security, fostering comprehensive rural development, and reinforcing the overall resilience of the sector.

The success of these reforms, whether at the policy or procedural level, will largely hinge on the executive commitment of the Minister of Agriculture and the institutional capacity of the ministry's directorates to adopt and implement them effectively. Given that the majority of the proposed measures fall within the Minister's direct authority under Article (4) of the Agriculture Law, decisive action can be taken without necessitating complex legislative amendments, rendering the envisioned reforms both actionable and achievable within a relatively short timeframe.

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