Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 07/30/2020 | Report No: ESRSA00945

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Egypt, Arab Republic of	MIDDLE EAST AND NORTH AFRICA	P172548	
Project Name	Egypt: Greater Cairo Air Pollution Management and Climate Change Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	7/7/2020	9/29/2020
Borrower(s)	Implementing Agency(ies)		
Arab Republic of Egypt	Ministry of Environment		

Proposed Development Objective
To improve air quality management systems and to reduce air and climate pollutants from critical sectors in Greater Cairo.

Financing (in USD Million)	Amount
Total Project Cost	200.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed project includes four main components, and a project management component, all together aiming at: (i) enhancing the existing air quality decision support system in Egypt; and (ii) reducing air emissions from two main sources of air pollution in Greater Cairo, which are the open burning of municipal solid waste and vehicle emissions. The cross cutting component on stakeholder engagement, awareness and communication will complement and support the other components.

Brief description of project components:

1. Enhancing the Air Quality Decision Support System: This component will support enhancement of AQM decision support system in Greater Cairo / Egypt through strengthened AQM infrastructure (monitoring and analytical), capacity building activities, forecasting systems, emergency response plans and raising public awareness through information dissemination (using Air Quality Index / Air Pollution maps, etc.). It will also include evidence-based solutions for policy formulation and decision-making and develop a rapid response system and plans for emergency situations (e.g. "black cloud" episodes and other high pollution days).
2. Enhancement of solid waste management services in Greater Cairo: This component is intended to support the operationalization of the Solid Waste Management Master Plans of Cairo, and the urban areas of Giza and Qualioubya Governorates (constituting all together Greater Cairo region). This comprises a mix of institutional, regulatory and physical investments, all defined in the master plans and including the construction of one integrated facility landfill, closing of a high-risk dumpsite, and support to the establishment of successful Public Private Partnerships (PPPs) for the waste collection, transportation and recycling system. Activities to assist in responding to COVID-19 have also been added to this component, through improved healthcare waste management. 3.
Vehicle emissions reduction: This component will introduce urban transport measures that would contribute to the operationalization of the Cairo Transit Authority (CTA) plans to gradually convert part of its existing bus fleet from polluting diesel vehicles to electric buses, through the acquisition of new electric buses. This activity will be complemented by adequate support systems that will be put in place to ensure the sustainability of the operation, including the charging infrastructure, enhancement of the repair and maintenance workshops and training of the drivers and workers on the new buses and equipment, etc.
4. Stakeholders engagement and communication: This component aims at ensuring that all stakeholders are actively involved in the design, implementation and monitoring of all project activities and that it is implemented following a full consultative participatory approach. The success of such an approach is however very much dependent on the level of awareness and relevant information shared with the stakeholders and communicated in a transparent and continued manner. Communication plans will be developed and delivered in order to: (i) create a basic understanding of the solid waste management master plans and of the vehicle emission reduction plan; (ii) reach consensus and receive the endorsement of targeted beneficiary groups; and (iii) inducing positive behavioral changes. Partnerships with civil society organizations for monitoring the performance and the delivery of solid waste management services will be introduced.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project comprises five components with the objective of reducing air pollutants and GHGs from open burning of solid waste and vehicle emissions, which are two major contributors to air pollution in Greater Cairo Area (GCA). The project will be implemented in the geographical zone of GCA, which covers Cairo Governorate, the urban areas of Giza Governorate and Qalyoubia Governorate. Each of the five components includes several sub-components. The environmental, social (including land related issues requiring land acquisition and/or resulting in physical and/or economic displacement according to ESS5) as well as cultural heritage (relevant to ESS8) are limited to the sub-components included under components 2 and 3 only. The project interventions are planned to take place in a phased approach utilizing project funds and government funds while engaging the private sector in a Design Build Operate (DBO) modality mainly under Component 2. The project will also finance several enabling activities such as hiring consultants to prepare feasibility studies, technical studies and plans as well as E&S studies and instruments for the different interventions. This will be in accordance with the guidance note on Technical Assistance Type 1-TA. Due

to the COVID-19 pandemic and the government response to it, a new sub component (2.2) was added to the project which includes procurement of equipment (e.g. autoclaves), personal protective equipment and other disinfecting equipment. The implementation of this subcomponent will take place in under-served university hospitals all over Egypt.

The physical interventions are phased as follows:

First year investments:

•Construction of main access road and the surrounding roads around the Integrated Waste Management Facility in 10th of Ramadan (IWMF-10R), main internal access roads, fences, water and wastewater connections and electricity connections from the utilities to the facility.

•Construction and operation of Municipal Waste Treatment facilities for Qalyoubia governorate with an estimated capacity of 2000 ton/day and for Cairo Governorate with an estimated capacity of 3000 ton/day.

•Construction and operation of a Sanitary Landfill for Cairo governorate with a capacity of 14 Million tons for 5 years (Government funds).

•Construction and operation of the first cell of the Sanitary Landfill for Qalyoubia with a capacity of 7 Million tons for 5 years.

•Construction and operation of a shared Construction and Demolition Waste treatment facility for both governorates with a capacity of 100 tons/day

Second and/or third year investments:

•Construction and operation of the shared Medical waste treatment and disposal facility in accordance with the findings of the technical studies above

•Closure of Abu Zaabal dumpsite in accordance with the engineering studies which is expected to be in year 2 or 3 during the project implementation

•Upgrading of existing bus depot to support e-buses

•Procurement of 10 e-buses

Third and/or fourth year investments:

•Construction and operation of the Hazardous Waste Treatment and Disposal Facility (HWTDF) in accordance with the feasibility study

•Construction of Environmentally Controlled Transfer Stations in Giza or Qalyoubia governorate:

•Establishment of two environmentally controlled transfer stations

•Establishment of a solid waste educational center for the general public at the IWMF-10R to promote improved waste handling, segregation at source

• Procurement of 90 e-buses

Salient characteristics

Most of the project physical interventions (construction and operation of waste transfer stations, closure of existing dumpsites and introduction of electric busses to operate within existing bus routes) are planned to take place in urban areas in Greater Cairo governorates (Cairo, Giza and Qalyubiya). However, two major interventions (construction and operation of IWMF, HWTDF, and upgrading of the Akrasha informal industrial area) will take place in vacant desert areas away from any residential or commercial areas by a distance more than 50 kilometers.

Greater Cairo Area is the largest metropolitan area in Egypt (Cairo being the Capital of Egypt), with a population of over 20 million, the largest in Africa, the Arab world, and the Middle East. Solid waste accumulation and lack of efficient and modernized solid waste collection management system have been historically problematic and result in significantly negative environmental, social and economic impact on the entire population of Greater Cairo and its visitors. One of the key environmental features in GCA is the Nile River which passes through the three governorates. While Giza hosts many UNESCO-declared world heritage sites (e.g. Great Pyramids & Sphinx), Cairo hosts many world recognized cultural-heritage and religions (Christian and Islamic) sites. Qalyubia is known for its agricultural production of crops, fruits and vegetables. It also has four industrial zones which are located in desert areas away from the old towns and villages. Qalyubiya is also famous for hosting the Delta Barrages, the first modern irrigation structure across the Nile, located at the apex of the Nile Delta and built in 1862. It is surrounded by vast areas of public green parks where many Egyptians aim at during different occasions and festivals. There are three declared protected areas in GCA (Petrified forest, Wadi Degla and El-Hassana Dome). As explained above, the project physical interventions will be implemented either in heavily urbanized areas or in remote desert areas. Although many locations of project interventions are not specifically determined, the project interventions, by their nature and characteristics, are expected to be far away from any environmentally sensitive receptors or areas of ecological importance. Similarly, no archeological sites or cultural heritage sites are expected to be close to any of the planned interventions. In all cases, the prepared ESMF has provided sufficient restrictive measures concerning site selection for specific activities such as landfill sites, transfer stations and other waste treatment activities. Chance find procedures and requirements of ESS8 have also been included in the ESMF.

The location of the proposed IWTF-10R is determined to be close to 10th of Ramadan industrial city, about 5 km south of its industrial area. It is in a vacant desert area. Qalyoubia landfill and the C&D waste treatment facility are located within the IWMF-10R. The total area of the IWMF-10R is 1226 Feddan free from significant fauna or flora due to the scarcity of water. Ground water depth reaches beyond 150 meters below the surface and the water in the underground reservoir is of high salinity, its quantity is not large, flowing, or renewable, as it is considered one of the lowest production reservoirs. The 10R site is free from any flood risks. The entire IWTF-10R land is state-owned, free from any economic activities or installations and the entire area is devoid of any facilities. The history of the project land use has been traced through satellite maps (Google Earth) from 2010 to 2019; the maps did not show any previous works or uses of the proposed project site.

A candidate location for the HWTDF was proposed in Al-Kuraimat (in the Eastern desert of Cairo). The site has similar characteristics to the IWTF-10R in terms of scarcity of fauna and flora as well as the depth of the ground water table. However, unlike the 10R site, Al-Kuraimat is exposed to flood risks in some parts of the land.

The candidate dumpsite to be closed is located in Abu Zaabal village, 18 km from Cairo, 30 km from Banha and belongs administratively to Khanka district, in Qalyoubiya governorate with a total area of 100 feddans (feddan = 4200 square meters). Abo Zaabal is known to host extensive military–industrial complex and well-developed chemical industries. The area is considered heavily air polluted mainly from the chemical fertilizers industrial complex. The area is also famous for the presence of surface and subsurface water bodies which might be heavily polluted from the industrial activities in the area. The dumpsite is also known for spontaneous fires due to self-ignition of the dumpsite gases.

The affected populations from the project interventions vary from one intervention/location to the other. However, since no locations are yet determined, except 10th of Ramadan site, it is not possible to assess the impacts on any nearby communities. For the IWTF-10R, the nearest residential areas (with low population densities) are 9 and 14 km away in 10th of Ramadan City and Badr City (which are new urban communities), respectively. These communities are not expected to be significantly negatively impacted since the access to the site will be from highways and will not penetrate any of these two cities. In addition, any odors or other negative aspects related to the construction or operation of the IWMF-10R will not affect these communities due to the location of the IWMF-10R downwind. It is expected that the construction and operation of the IWMF-10R will generate temporary and long-term jobs for the nearby communities in 10th of Ramadan City and Badr City.

D. 2. Borrower's Institutional Capacity

The implementing agency, Ministry of Environment (MoE), has a very long-standing experience in leading the environmental management in the County. The MoE and the Egyptian Environmental Affairs Agency - EEAA (the executive body under MoE) are the highest authority in Egypt responsible for promoting and protecting the environment and coordinating adequate responses to these issues. MoE is also the main proponent agency for the Environmental Protection Law, its executive regulations, decrees and Environmental Guidelines. With regards to air pollution, MoE and EEAA are responsible for developing policies, laws and regulations to address air pollution control measures. The protection of air from pollution is one of the main priorities of the Ministry and its Executive Agency, which is reflected on a long-term commitment to this issue as expressed in the Ministry's five-year action plan. This comes in line with ongoing efforts in the application of existing environmental legislation, where the air quality is one of the key issues in the Environmental Law No. 4 of 1994 and subsequent amendments. The Central Department of Air Quality and Noise Protection Environment Quality Sector under EEAA has highly qualified environmental staff who are dealing with several relevant air quality topics and sectors such as: air quality monitoring, health impacts of air pollution, programs addressing vehicle exhaust reduction. This department has recently cooperated with the World Bank in undertaking an analytical study on air pollution in Greater Cairo which provided solid ground for proceeding with the development of this project.

With regards to solid waste management (SWM), the MoE is engaged in the development of national solid waste management strategies and implementation of national campaigns and communication strategies that aim to raise the awareness of the citizens and other stakeholders. The capacity of MoE and EEAA to manage complex large pollution abatement projects is very high given its history in working with international development agencies, including the World Bank. EEAA has implemented hundreds of national, sub-national, sectoral and other thematic

pollution prevention and abatement projects. With support from many international development agencies, EEAA staff gained significant technical knowledge in the different sectors as well as in Project Management of internationally financed large scale complex projects. In the meantime, the main responsibility of SWM in Egypt lies within the mandates of the local authorities (governorates and city councils), which are under Ministry of Local Development - MoLD. However, due to the significant challenges facing solid waste management in Egypt, the weak capacity of the governorates, the Waste Management Regulatory Authority (WMRA) was created by a Ministerial Decree (3005/2015) as one of the executive agencies of MoE which is mandated to oversee and coordinate efforts to tackle SWM challenges nation-wide. WMRA is well staffed with highly qualified environmental specialists who will play an important role in overseeing and ensuring that the project's goals are being met and will develop lessons from this project to be considered in implementing other projects in other governorates.

According to the project design, there are other line ministries and governmental agencies / authorities taking part in the project's implementation: MoLD and Qalyubia Governorate in Phase 1 (parts of Component 2), Cairo Transport Authority and Ministry of Transport (parts of Component 3).

On the social side, the capacity of the MoE in relation to social risks management is relatively limited. The Environmental Law, which is currently being reviewed, has very limited substance related to social impacts assessment and social risk management. In terms of citizen engagement, the MoE has active programs of outreach and awareness raising related to different environmental topics, including SWM and air pollution. The programs engage with various groups of stakeholders, including youth, NGOs, women and children. Other Project counterparts like MoLD through the Governorates also have intensive presence on the ground and direct engagement with the citizens, particularly in relation to offering SWM related services.

However, it is worth mentioning that the ESF application is a new area for the MoE as well as other relevant stakeholders engaged in this project.

A Project Management Unit (PMU) will be established and will maintain an organizational structure at the MoE in order to coordinate the implementation of the different project components among all relevant parties. The PMU will be staffed by highly qualified specialists to support management of environmental and social risks, including an environmental, a health and safety, a social development and gender specialist and a communication specialist. This is in addition to E&S consultants/consulting firms, who will be mobilized to support in different E&S tasks as required. Currently, an Environmental and Social Risk Management focal point has been assigned to the Project team and has been following up closely in finalizing the ESF instruments (Environmental and Social Management Framework (ESMF), Resettlement Framework (RF), including results of the Land Due Diligence for the IWMF-10R and a preliminary Environmental and Social Impact Assessment (ESIA) for Qalyoubia Sanitary Landfill and Shared Construction and Demolishment (C&D) Treatment Facility (Qalyoubia and Cairo Governorates). Moreover, a communication and awareness team from the MoE relevant department has been assigned as focal point for issues related to the Stakeholder Engagement Plan (SEP), communication and awareness raising (mainly component 4 activities). ToRs for the specialists to be hired by the PMU will be prepared and approved by the Bank. As per the ESCP, and PMU should be fully functioning 30 days after effectiveness.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) High

Environmental Risk Rating High

While the objective of the project is to improve the overall environmental conditions in GCA through reduction of air emissions from burning solid wastes and vehicle emissions, the construction and operation activities to achieve the desired objectives will, themselves, have significant negative environmental and social impacts, which need significant, costly and highly technical mitigation measures. The integrated waste management facilities (IWMF) near 10th of Ramadan city, will include sanitary landfills, infrastructure for different hazardous/non-hazardous waste streams recycling (e.g. domestic, organic, electric/electronic, medical, etc.) as well as access and internal infrastructure to serve the facility operations (e.g. roads, water network, electricity, sewage, etc.). During construction, typical associated risks and impacts include air emissions from construction machinery and earth movement, noise, soil contamination, generation of solid and liquid wastes, use of hazardous chemicals, generation of hazardous wastes, occupational health and safety risks and road safety risks due to the movement of construction vehicles and equipment to and from the construction sites. These impacts are expected to be moderately significant, temporary, mostly site-specific with some irreversible impacts such as changes in the landscapes and land use. However, the operation of the IWMF, if not properly designed, constructed or operated, may result in contamination of soil and groundwater by leachate, generation of landfill gas and odors from the degradation process, spread of harmful insects and increase in scavenging animals in addition to significant occupational exposure to chemicals, pathogens and vectors and significant risks to public health and nearby communities.

Also, transfer stations construction and operation entail typical construction impacts in addition to operation phase impacts, which are mainly related to management of waste, leachate management, littering and visual impacts, disposal of some hazardous materials, and air quality impacts. Additionally, closing of dumpsites and removing of historical and current accumulation will entail significant occupational health and safety risks due to occupational exposure to pathogens, victors and chemicals. The activities while will be performed to close old dumpsite(s) will also entail significant health risks to the project workers.

Under Component 3, while the overall outcome of this component is environmentally positive aiming at reducing air emissions from the old diesel-operated public busses, there are still some negative environmental impacts associated with the operation and maintenance of the new buses. These impacts are associated with the disposal of batteries of the e-busses and the scrapping of the retrofitted busses, which may also result in negative environmental impacts related to disposal of solid and hazardous wastes resulting (e.g. disposal of engine oils, batteries, electronic wastes, etc.).

Activities under the TA sub-components (under components 2 and 3) may result in high risk physical interventions or activities that are associated with significant environmental and social implications.

The Project is likely to generate a wide range of significant adverse risks and impacts mainly on the environment. This is due to the complex nature and the large scale of the project. The expected impacts are high in magnitude, have significant adverse cumulative impacts, a high probability of serious adverse effects to human health and/or the environment (e.g. due to accidents, toxic waste disposal, etc.). In addition, the Borrower and the implementing agencies have no prior experience in implementing ESF requirements and have quite limited capacity in developing

complex projects which may present significant challenges given the nature of the Project's potential risks and impacts.

Social Risk Rating High

At this stage of the project, the analysis for the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential social risks and impacts; and the capacity and commitment of the Borrower revealed that the social risk should be classified as high. This analysis was made in light of the available information and could be reviewed, including during implementation, and the classification be changed as necessary, to ensure that it is appropriate. Below are the main justifications for the high social risk:
1) In relation to the type and sensitivity of the activities, component 2 as well as the TA under component 2 and 4 will support interventions and contractual agreements that will make the SWM value chain more efficient and financially sustainable. Those formal operational layers might disturb the informal sector entry points in the value chain posing a risk of their exclusion. This is specifically applicable to:
A) Traditional garbage collectors (Zabbaleen) who have been running their family businesses related door-to-door collection, sorting, recycling and manufacturing and have been offering a service perceived as efficient. If the SWM chain upgrade does not engage them, there is a social risk of exclusion, loss of livelihoods and conflict.
B) Informal waste pickers who are operating on full time basis in the dumpsites. They are usually engaged in sorting and selling recyclables. Once more information is obtained, more consultation will be undertaken with them.
C) During the course of project implementation, streets of GCA are expected to become cleaner, street containers and garbage piles to be more frequently removed, the street waste pickers who recover recyclables from those locations to sell them, will not find much recyclables left. This is a less organized group and the impact on them is expected to be less sever because of their causal and part time working mode which make it also very difficult to track and quantify them.

2) Physical interventions may pose land and livelihoods related negative impacts: The location of one of the integrated facilities has been determined on vacant state-owned land plot, free of users. A retroactive review revealed no risk. However, locations of the transfer stations as well as the HWTDF have not been identified yet. While the selection of the land of those facilities is expected to be on state-owned land, there is a risk that the selected locations are used by squatters. Additionally, when screening for land impacts, the buffer zones/right-of-way and access roads for landfills will also be included, which may have impacts on the plan of land use in the area.
3) Sub-component 2.3.1., the package of the TA support offerings to WMRA includes range of topics on financial management and service sustainability. Along with the expected issuance of the new Law, service fees increase is quite probable, and it associates with risk related to affordability, financial burden and low levels of willingness to pay.
4) Component 2, with major construction activities anticipated, labor related risks are applicable, including risk of child and forced labor, unfair and/or unclear contract terms and conditions, discrimination and non-equal opportunities and GBV/ SEA. Further elaboration is included in the LMP.
5) The location of the undetermined SWM facilities risk to be inadequate and lead to communities' discontent to have those facilities close to their houses or lands ("Not in my backyard" situation). Resulting in neighboring communities to likely oppose to the project.

6) Complexity of the project and diversity of the activities, with relatively limited institutional capacity and familiarity with the ESF.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

As part of the scoping phase, the Bank team conducted number of stakeholder meetings and reviewed large number of documents including government strategy and work program, available technical studies on the different project components, Egypt e-mobility policy, studies on social inclusion and history of garbage collectors.
On the environmental side, as explained under the ESRC section above, the construction and operation of the different project physical interventions will result in significant adverse environmental, community and Occupational Health and Safety (OHS) impacts on all biological and physical environmental attributes (fauna, flora, air, noise, soil and ground water). These risks and impacts need to be properly assessed in order to determine the necessary mitigation measures according to the risk mitigation hierarchy (avoidance, reduction and mitigation). A number of Environmental and Social assessments need to be carried out according to clear criteria and following the ESF requirements especially under ESS1. Environmental assessments to be conducted include : ESIAs, Environmental Audits, site suitability and environmental sensitivity (including flood risk analysis) for specific investments, Environmental and Social Management Plans (ESMPs), medical waste management plans and road safety plans. For subcomponent 2.2 on response to COVID-19 pandemic, infection Prevention and Control and Waste Management Plan (IPC&WMP) will be prepared for each hospital to be upgraded or equipped with medical equipment or supplies according to the planned intervention which will be determined at later stages. All instruments required are to be prepared as listed in the ESCP.

The Project is anticipated to bring positive social outcomes to the residents of GCA. This was confirmed through the prepared ESMF and the site specific preliminary ESIA. Improving the waste management will contribute to a better organized solid waste management cycle. This will then contribute to a cleaner neighborhood, less random dumping, more efficient waste collection and transportation, and consequently a higher level of satisfaction from the citizens. The construction and operation of the different facilities under this project will result in the creation of large number of job opportunities (both short and long term). Economic opportunities will also likely benefit the vulnerable groups, including the most marginalized groups who are currently informally engaged in the waste managed related sector. The ESMF helped in better identification and profiling of the informal sector groups. In the meantime, the Bank is carrying out a a Social Inclusion Study as part of the Bank's due diligence during the Project preparation and the findings of this study will help in informing the project interventions of the different project components that will be phased as described above under section D1 . This will in turn help to ensure that the components are designed in a manner that will bring fair opportunities to the groups of the informal sector and will mitigate the risk on negative implications on their livelihoods. The prepared social instruments pointed out the risks of child labor, community health and safety during construction, temporary labor influx that might result in unfavorable impacts on the project candidate areas, including potential risk of GBV, potential impacts on land use. They also flagged potential risk related to land acquisition and loss of livelihoods.

In relation to the ESS1 and for each of the project components to be prepared in the future as per the phasing of the interventions, a site specific ESIA will be conducted by the Government to assess the potential impacts and risks based on the measures under the ESMF. This is stipulated as part of the Government commitment under the ESCP.

The most disadvantaged and marginalized groups which may be impacted by the project are: a) informal sectors groups, of poor families, women and children (the type of impact will vary from one groups to the other and the magnitude and significance of the impact is still not known for several groups; b) Individuals/groups who could be affected from land acquisition particularly poor, acquiring livelihoods from the land without legal title; c) groups near waste facilities during operation; d) communities near construction sites, including women and children. Mitigation measures to deal with the potential risk and impacts on each of the identified groups have been included in the ESMF, the ESIA and the RF. The SEP also includes clear guidance on the communication and information sharing with each of the identified groups.
Moreover, under component 2.3 "Enabling activities, capacity building and institutional strengthening activities", assessment and formulation of recommendations for channeling collected fees and development of a proper financial management system and modus operandi of these funds will take place. With those additional services and the issuance of the new Law, service fees increase is quite probable, and it associates with risk related to affordability and low levels of willingness to pay. The results framework includes an indicator on gender and age groups disaggregated beneficiary feedback survey to measure that citizens are satisfied with waste collection and management (in relation to the fees collected), among others.

The following instruments will be prepared and implemented throughout the project implementation as per the timeframe committed by the borrower in the ESCP:

Instruments to be implemented after clearance and disclosure:
- The project ESMF and RF which are covering the scope of the entire project.
- Preliminary ESIA for Qalyoubia Sanitary Landfill and Shared Construction & Demolition (C&D) Treatment Facility (Qalyoubia and Cairo Governorates).

Instruments to be updated, prepared, cleared and disclosed:
- Update Stakeholder Engagement Plan (SEP), already prepared
- Cumulative Impact Assessment (CIA), including Traffic Impact Assessment (TIA) for all the components of the IWMF-10R that are financed by component 2 or Government fund
- Comprehensive ESIA (including TIA and PMP) for construction and operation of the first cell of Qalyoubia Sanitary Landfill.
- A Baseline Site Assessment study and an ESIA for the construction and operation of the shared Medical waste treatment and disposal facility for Cairo and Qalyoubia governorates
- Site specific ESIA studies and Pest Management Plan (PMP) for all IWMF-10R components that will be financed by the government fund and developed by the private sector including (all MSW treatment facilities, Cairo governorate Sanitary landfill, and any other facilities planed within the boundaries of IWMF-10R)
- A Baseline Site Assessment study, an ESIA and a Pest Management Plan (PMP) for the construction and operation of the Hazardous waste treatment and final disposal facility including a TIA
- A Baseline Site Assessment study and an ESIA for the construction and operation of the Transfer Stations.
- An ESIA for the closure plan of the dumpsite(s) noting that closure will start after the new controlled landfill site of the 10th of Ramadan is constructed and operational
- An ESMP for the outcomes of the detailed design study which will select the bus routes, determine the type of battery and the needed infrastructure (i.e charging stations location and capacity) and design the retrofit needed in the selected bus depots.
- An ESIA for the upgrade of Akrasha Area (Type 1 TA) which may identify physical interventions

- Environmental and social assessment will be carried out for the type 2 and type 3 interventions under enabling activities of component 2.
- For future unidentified Type 1 and 2 TA that will support new physical interventions in the SWM in GC, an ESIA will be carried out
- Adopt , implement and update the Labor Management Procedures (LMP), that have been developed for the Project
- electronic waste management plan for the safe disposal/treatment /reuse of electric buses Batteries Infection Prevention and Control and Waste Management Plan (IPC&WMP) according to the EHSGs, and other relevant Good International Industry Practice (GIIP) including relevant WHO guidelines on COVID-19, in a manner acceptable to the Bank.

ESS10 Stakeholder Engagement and Information Disclosure

The project design strongly emphasized on stakeholder engagement with sub-component 4.4 dedicated to engagement and communication. This sub-component is closely following the principles of ESS10 in relation to establishing a systematic approach for stakeholder engagement and information disclosure, as early as possible. This will support the Government to identify stakeholders and build and maintain a constructive relationship with them. Given the high risk of this project including the complexity of the stakeholders involved, the SEP is meant to be comprehensive and prepared by the client, then reviewed and approved by the Bank before the project appraisal. The initially identified groups as per the ESS10 classifications are: 1) stakeholders who will be or likely to be affected by the project. This will most importantly include but will not be limited to: a) the informal sector of the traditional Zabbaleen groups, waste pickers at dumpsites, other less organized waste pickers, recyclables traders, informal manufacturer, etc.; b) local residents in GCA disaggregated by the socioeconomic category, gender, type and class of neighbourhood, etc.; c) formal waste workers at different parts of the SWM cycle; d) land owners or users who will be affected by land acquisition; e) commuters using public transport facilities, including women; f) bus drivers; g) actors managing healthcare waste in underserved university hospitals, sanitation workers, and workers responsible for cleaning and maintaining public transport and waste transport vehicles; h) doctors and nurses. 2) Other interested parties of those who might have interest in the project and might be also positively affected by the project. This will most importantly include a) Government entities related to the project (e.g. MoE, EEAA, MoLD, etc.); b) Local firms/private sector who might be interested to get engaged in the system. Those should be disaggregated by their scale, market power and affiliation (formed by the Zabbaleen or non-Zabbaleen); c) syndicates and labor unions, including the garbage collectors syndicate; d) NGOs; e) media, etc. 3) Vulenrable groups related to the project include: a) informal sectors groups, of poor families, women and children (the type of impact will vary from one groups to the other and the magnitude and significance of the impact is still not known for several groups); b) Individuals/groups who could be affected from land acquisition particularly poor, acquiring livelihoods from the land without legal title; c) communities near construction sites including women and children; and d) groups managing infected waste. Comprehensive elaboration of the stakeholders has been done following consultation with the client and other stakeholders before appraisal. A variety of methods will be used to reach out to the various vulnerable groups. Differentiated methods will be used for consulting and sharing information with to ensure they are informed of the project activities, have the opportunity to provide their feedback at key stage of the project in a way that is appropriate for their capabilities and that would allow them to freely express their views (e.g. small groups discussion, meetings in neutral and accessible venues, using visual tools for information sharing, ensure

confidentiality and following a non-intimidating approach in all the activities). Moderators for the consultations should allow for the views to be expressed through asking locally sensitive questions. To maintain constructive relationship with different groups including the vulnerable groups, feedback should be offered systematically to demonstrate how the provided input during consultation have been utilized.

The project includes a SEP, which is planned in a systematic manner to help in enhancing trust and in establishing a constructive relationship between different stakeholders. The SEP assists the client in understanding the complexity of the relationships, interests, influence and dynamics among the stakeholders and follows an inclusive and culturally appropriate approach, which will provide a space for different stakeholders to engage and to provide design related input. The SEP identifies what information will be in the public domain, in what languages, and where it will be located. It explains the opportunities for public consultation, provide a deadline for comments, and explains how people will be notified of new information or opportunities for commenting. It explains how comments will be assessed and taken into account. It also describes the project's grievance mechanism and how to access it. The project also commits to releasing routine information on the project's environmental and social performance, including opportunities for consultation and how grievances will be managed.
Experience shows that successful projects usually involve many players – governments, civil society, international agencies and the private sector – working together to deliver real progress in complex situations and despite strong resistance. In line with this approach, the project has included a full component on stakeholder engagement and communication (component 4) endowed with a substantial budget and resources. This is an innovative approach as stakeholders are considered key pillar of the success of the project and are invited to join efforts from the design to monitoring phases. Multiple entry points are provided with identified groups of actors as described in the following sections. The project embraces an adaptive approach and is intentional in making decisions and adjustments in response to new information and changes in the context. This refers to adaptive management which is about changing the path being used to achieve the goals in response to changes.

The Government conducted range of consultative activities to inform the design of the projects. Those are explained in more details in the prepared E&S instruments and they most importantly include the activities by MoE and the activities by Qalyubia Governorate. The MoE with support from the E&S consultant conducted two consultations in March and June 2020 with around 25 participants each time, from different affiliations. The participants included administrative officials from the governorate level (8 WMRA, 3 MoE, EEAA, ...), administrative officials from the local level (Giza, Cairo and Qalyoubia governorates), consultants/experts, community members (representatives), civil society organizations, Academic Institutions and private sector (factories, companies, suppliers and traders working in the waste field). The first consultation included a presentation on the scope of the ESMF, ESIA and RF and preliminary findings related to the impacts of the project, while the second consultation present the findings of the ESIA, ESMF and RF groups to the various stakeholders. All comments were responded to and documented in the consultation chapter of the ESIA and the ESMF. They most importantly include suggested additional studies to be considered by the project (e.g. the traffic studies), technical details related to the SWM component (e.g. paying attention to the hauling distance, waste compositions, e-waste final disposal), emphasis on integrating the informal sector and building on the accumulated lessons learnt.
Governorate of Qalyubia has also been engaged in several consultation activities and field visits in December 2019, most importantly with the workshop owners of Akrasha industrial area, waste collectors in zarayeb area (at least 20 members participated); small scale formal contractors (motaahedeeen) (at least 15 members participated) and Abu Zabaal dumpsite (potential location for closure). Consultation related to the stakeholders' roles in the project as part

of project preparation, including discussions for options to improve working conditions and the work related challenges that stakeholder groups encounter, challenges encountered by the small-scale contractors. The conducted consultation helped the Government in the design of the Project.

Due to the current COVID-19 crisis, and the social distancing requirements imposed in the country under COVID-19 circumstances, MoE is taking and will take the precautionary approach for as long as the risk exists, to minimize the risk of COVID-19 transmission during stakeholder engagement activities (such as avoidance of public gatherings, public hearings, workshops and community meetings, use of online communication tools to design virtual workshops). During the consultation on the findings of the safeguards instruments in June 2020, MoE facilitated a virtual consultation and will be utilizing social media pages and other digital platforms to get the consultation accomplished. Upon completion of the consultations, results will be added to the SEP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This ESS will be relevant given the size and the nature of interventions under the project. Major construction works will take place in some of the identified interventions such as sanitary landfills and transfer stations and might also take place in the future interventions that will be identified at a later stage. The boundaries of the application of this ESS2 will be further determined after getting better understanding on future activities and what they would include in relation to labor and their working conditions. The project will entail 3 categories as stipulated in the ESS2, namely: a) direct workers; b) contracted workers; and c) primary supply workers. The total number of workers will be approximately 450 divided into: 50 Direct Workers; 350 Contracted; and 60 Primary Supply Workers. The client developed written draft labor management procedures (LMP) with clear employment terms and conditions to ensure equal opportunity, prevent discrimination and protect vulnerable workers.

The project activities during construction and operation will entail different types of health and safety risks, including exposure to physical, chemical and biological hazards, special hazard environments such as confined space in addition to possible infection of project workers with COVID-19. Coupled with the weak OHS culture in the country, health and safety risks will have high potential to occur. To ensure health and safety of workers during the project lifetime, the LMP includes OHS policies, procedure and training and monitoring requirements for the different project's components. The LMP includes an assessment of other potential labor related risks, likely incidents of child labor or forced labor; unfair and/or unclear contract terms and conditions including wages, overtime, compensation, benefits and working hours, irregular payment of salaries; discrimination and non-equal opportunities; likely presence of migrants or seasonal workers; risks related to labor influx; GBV/SEA; possible accidents or emergencies, with reference to the sector or locality, freedom of association and collective bargaining.
Infection Prevention and Control and Waste Management Plan (IPC&WMP) according to the EHSGs, and other relevant Good International Industry Practice (GIIP) including relevant WHO guidelines on COVID-19, in a manner acceptable to the Bank, are included in the draft LMP. Commitments towards finalization of the LMP and the implementation and updating of the LMP are included under the ESCP.

ESS3 Resource Efficiency and Pollution Prevention and Management

The main development objective of the project is to reduce air and climate pollutants through reduction of open burning of waste and air emissions from transport sector, which is totally aligned with ESS3. Municipal waste in GC is generated at a rate exceeding 1.2 kg/person/day and collection coverage is about 70 percent. As a result, uncollected waste and poorly treated waste such as unrecycled plastic (more than half) are dumped into open sites that are subject to open burning. Hence, poor SWM, especially in terms of organic treatment, recycling and disposal is responsible for human-made or self-igniting waste burning in dumps also contributing to less than 1/3 of GC air pollution in terms of PM. These significant sources of air pollution (vehicle emissions and open burning of solid waste) are also directly linked to emissions of greenhouse gases (GHGs), including inter alia, black carbon, ozone, CO2, methane and nitrous oxide (NOx) where transport and waste represent 14.8 percent and 8.1 percent respectively or when combined together, almost a quarter of Egypt's total GHG emissions of 325,614 Giga gram of CO2 equiv. in 2015. Also, the project is aiming at increasing the percentage of recycled waste in Greater Cairo which will promote efficiency of raw material use. During implementation, the construction activities of the project interventions will include a wide range of air pollutants, solid wastes and hazardous wastes depending on the scale and type of the intervention and the construction and operation phase. Air pollutants during construction phase will be mainly associated with construction equipment and vehicle emissions, fugitive dust emissions, moving of excavated soil. Those air pollutants, including gases and noise, are expected from all the physical interventions of the project, however there will be variations depending on the locations, scale of each intervention and proximity to sensitive receptors. Also, during closure of dump sites, great attention should be made to prevent waste from self-ignition during closure processes and potential emission of methane gas post-closure of dump sites. In order to prevent air pollutants and to avoid also associated health and safety risks, the E&S instrument shall detail mitigation measures to mitigate those impacts. Air pollutants during operation phase will be mainly generated from the waste management infrastructure including IWMF and transfer station. Air pollutants include mainly green-house gases associated with operation of landfills, movement of vehicles and equipment, that are serving landfills and transfer stations, and bad odors. Significance and likelihood of the impacts shall be assessed during the preparation of each the E&S instrument. Also, the instrument shall consider the closure and post-closure phases of the landfills and potential methane emissions. Construction activities of the new infrastructure will be associated with generation of typical construction wastes including municipal waste, hazardous waste and wastewater. The amount of the generated waste will vary depending on the scale of the new infrastructure and type. Proportionate to the significance of the impacts associated with the waste generation, the E&S instrument shall detail required mitigation measures. Also, great attention should be made to the management of excavated soil generated from construction of new landfill cells.

For the closure of dumpsites, considerable amount of wastes varying in types will be collected to be properly disposed. It is anticipated that most of the waste will be of non-hazardous nature, however in most cases hazardous waste or waste contaminated with hazardous materials will be there too. Therefore, the E&S instrument shall assess the types of wastes in each dumpsite and propose particular management and disposal measures to deal with different waste typologies. Waste and hazardous materials generation during operation, will vary according to the type of the infrastructure. Leachate generated from landfill sites shall be managed in accordance with GIIP to prevent groundwater and soil contamination. Consequently, specific measures shall be designed as part of the E&S instrument to detail leachate management plan. Moreover, Transfer stations at local level may cause the development of uncontrolled dumping of waste resulting in substantial impacts to the communities.
Some activities under Component 2 (e.g. landfill operation and closure of dumpsites) may require the use of pesticides to combat insects and other disease vector control measures. The use of pesticides with big quantities, if not properly managed, may result in significant negative health and environmental impact. The E&S assessment

instruments will include requirements for preparation of proportionate mitigation measures including preparing a Pest Management Plan before proceeding with procurement of any pesticides.
Therefore, the E&S instrument shall include specific measures to prevent such impacts during the operation. Also, the impact associated with hazardous and nonhazardous waste transportation from/to both IWMF, transfer stations, and closure of dump sites shall be considered in the E&S instruments. Transportation of waste may entail different impacts that shall be assessed and mitigated including, but not limited to, traffic impacts, littering, spills and accidental release of hazardous wastes. E-buses operation will result in generation of batteries, which is considered hazardous waste, that shall be considered during preparation of the E&S instrument using a cradle to grave approach. Additionally, the instrument shall consider also the generation of hazardous and nonhazardous waste from scrapping of retrofitted buses.
Component 2.2 which includes procurement of medical equipment and supplies to respond to COVID-19 pandemic in some hospitals will result in generation of healthcare wastes. If not properly handled, these wastes are considered infectious and will pose significant health risk to the public and nearby communities. Therefore, Infection Prevention and Control and Waste Management Plan (IPC&WMP) need be prepared for each hospital according to the planned intervention to ensure that community health and safety risks are prevented at source.
Efficiency of water use during construction of civil infrastructures shall be addressed in the E&S instruments for all the physical interventions of the project as well as the TA subcomponents that may lead to physical interventions. During construction activities in desert areas, water demand will be mainly due to dust control, sanitation, concreting and human consumption. The E&S instrument shall assess and identify the availability of water resources in the projects' areas, given the scale of the project and the expected workforce. Also, the project will investigate the possibility to introduce energy efficiency measures including utilization of biogas produced from the landfills, use more energy efficiency equipment and promote solar energy for different infrastructures. Therefore, the E&S instruments that will be prepared should consider the requirements of ESS3.
Adequate measures for all above concerns need to be considered, during the preparation of each E&S instrument, in accordance with the World Bank EHSGs and proportionate to the associated risk.

ESS4 Community Health and Safety

The main risks associated with community health and safety are attributed to Component 2 and 3 activities.
The proposed sites for the IWMF will be in desert areas, remote from communities. The nearest residential community to the IWMF is about 9 km (in 10th of Ramadan City).The impacts of construction and operation of the waste treatment facilities, if poorly designed or operated, may result in health and safety risks to the nearest communities. The sphere of influence of the construction and operation of such facilities may extend even to relatively far communities due to bad odors, increase in rodents and insects, increased road traffic accidents during construction and/or operation, impacting surface and ground water bodies, etc. This requires the preparation and adoption of road safety plan and Emergency Response Plans to deal with potential road accidents during construction and operation of the different project activities.
The establishment of transfer station may take place within or nearby existing communities. These stations, if poorly sited or managed, will pose significant public health risks. Additionally, as the number of cars collecting garbage daily is high (e.g. around 145 truck enter Zamalek neighborhood), trucks waiting to enter the transfer station could cause traffic disturbance to neighboring communities. This will require the preparation of a traffic management plan to address any negative impacts on the environment or social receptors.

The closure of existing dumpsites which are near communities, if not done properly, the disintegration of organic materials will result in emissions of toxic air emissions, green-house-gases and bad odors. Risks of gas explosions due to high pressure and temperature may also occur. Scrapping sites for retrofitted busses, if close to communities, may have community health and safety concerns.
GBV was assessed at this stage as low. Building on the available information for the project to date, a GBV assessment has been conducted covering the known parts of the infrastructure, the assessment revealed that the GBV risk related to labor influx is considered low given the currently known scope. As part of the potential risks related to labor influx and labor behavior, the GBV risk needs to be carefully re-assessed regularly following the planned phased approach and, if applicable, GBV measures will be applied. In relation to the risk of sexual harassment in public transport identified in the PAD, an indicator in th RF was included to realize surveys including on "users' perception of personal security and risk of sexual harassment" to female/male users before and after the bus service becomes active. An analysis of users' needs in public transport will be conducted through focus groups who will then help CTA develop an action plan including mitigation and corrective actions such as the introduction of security measures at stations and aboard buses (e.g., cameras, alarm systems, anonymous safe channels to report complaints). In the meantime, the risk has also been identified in the ESMF and mitigation measures such as (cameras, penalty system in case of violating the instructions on maximum number of passengers, GRM made available,…) were included.

In relation to component 3, e-bus will be designed to be accessible to all users including persons with disabilities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

As mentioned above under ESS1 and the ESRC section, this ESS is considered relevant. At this stage and following the principles of ESS5, a RF including results of the Land Due Diligence for the IWMF – 10R has been prepared. The prepared RF included a gap identification between the Egyptian legislations and the ESS5 requirements, suggestions to bridge the gaps as well as an initial identification for the potentially affected groups and an entitlement matrix. The RF illustrated that land has been allocated to the IWMF - 10R and was confirmed to be state-owned and vacant from any usages. The conducted due diligence confirmed that there is no misalignment with the ESS5 principles in the past and that there is no need for any corrective actions. There is a potential risk of land acquisition and associated involuntary resettlement and/or livelihoods impacts in the site selection of the rest of the locations. The external infrastructure that will serve and feed into the facility have not been determined. The same applies to the locations of the transfer stations and the hazardous waste treatment and final disposal facility which all are not yet known. There is a possibility that the selected locations are on public land with private uses and/or on private land. For those facilities with unidentified locations, the relevant resettlement instrument should be prepared (e.g. resettlement plan) following the principles of the ESS5 and the prepared RF.

When screening land impacts, buffer zones and access roads for waste management facilities will also be included in the exercise. This intervention may also have impacts on land use plan in the area (e.g. the external infrastructure that will serve and feed into the facility). The ESCP stipulates the instruments that will be prepared and when each will be prepared. As applicable, resettlement plans should be prepared, approved, disclosed and compensation should be paid prior to the commencement of construction of any related infrastructure.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project will be implemented in urban areas of Greater Cairo. The IWMF will be established in desert areas on the outskirts of Greater Cairo close to industrialized areas. According to the available information, no natural habitats or biodiversity concerns are expected in the project areas. This ESS 6 is not relevant.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

As no indigenous communities present in the targeted geographic area of Greater Cairo, according to ESS7, the ESS7 is not considered relevant to the project.

ESS8 Cultural Heritage

Many of the project interventions will be implemented in urbanized areas. However, some of the project activities, especially under component 2, include construction activities requiring deep excavations, there are chances to encounter tangible cultural heritage sites especially that Egypt is well known of un-discovered archeological sites. The environmental and social assessments for the activities which have physical interventions will confirm the existence of tangible or intangible cultural heritage resources which may be impacted by any of the project activities. As part of the TA activities in this project, all construction contracts will include “Chance Find Procedures”, already prepared as part of the ESMF, which will require contractors to stop construction in the event that cultural property sites are encountered during construction. Also, any sites of tangible or intangible cultural heritage importance will be identified and measures for dealing with such sites/practices will be addressed as part of the TA activities.

ESS9 Financial Intermediaries

Currently the project modality does not include financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
1.1 ORGANIZATIONAL STRUCTURE Establish and maintain an organizational structure within the PMU and the Technical Implementation Units (TIUs) with qualified staff and resources to support management of E&S risks, including	12/2020

environmental, health & safety and social officers. This is in addition to environmental and social consultants/consulting firms as required. The PMU and TIUs are yet to be formed.	
IWMF-10R: Cumulative Impact Assessment (CIA), including Traffic Impact Assessment (TIA) and Pest Management Plan (PMP) for the all the components of the IWMF-10R that are financed by component 2 or Government fund, taking into consideration future expansions.	12/2021
Comprehensive ESIA (including TIA and PMP) for construction and operation of the first cell of Qalyoubia Sanitary Landfill.	03/2021
A Baseline Site Assessment study and an ESIA for the construction and operation of the shared Medical waste treatment and disposal facility for Cairo and Qalyoubia governorates	03/2022
Site specific ESIA studies for all IWMF-10R components that will be financed by the government fund and developed by the private sector including (all MSW treatment facilities, Cairo governorate Sanitary landfill, and any other facilities planed within the boundaries of IWMF-10R)	03/2023
A Baseline Site Assessment study and an ESIA for the construction and operation of the Hazardous waste treatment and final disposal facility including a TIA and a PMP.	06/2024
A Baseline Site Assessment study and an ESIA for the construction and operation of the Transfer Stations. For Closing and Rehabilitation/Containment of Dumpsite(s): An ESIA for the closure plan of the dumpsite(s) noting that closure will start after the new controlled landfill site of the 10th of Ramadan is constructed and operational	04/2022
An ESMP for the outcomes of the detailed design study which will select the bus routes, determine the type of battery and the needed infrastructure (i.e. charging stations location and capacity) and design the retrofit needed in the selected bus depots. Road Safety Plan for the e-buses Electronic waste management plan for the safe disposal/treatment /reuse of electric buses Batteries	12/2021
ESIA for the upgrade of Akrasha Area (Type 1 TA) which may identify physical interventions	06/2022
IPC & WMP to be prepared and Bank-cleared for each hospital as part of the procurement process and thereafter maintained throughout the carrying out of such activities.	07/2022
ESS 10 Stakeholder Engagement and Information Disclosure	
Prepare, adopt, maintain and operate a grievance mechanism (GM), as described in the SEP	03/2021
ESS 2 Labor and Working Conditions	
Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	03/2021

Prepare, adopt, and implement occupational, health and safety (OHS) measures within ESMPs/ESIAs specified under ESS1	
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Resource efficiency, pollution prevention and management measures including the preparation and implementation of Pest Management Plans (PMP) are to be complimentary to the different ESIAs and ESMPs to be prepared under ESS1.	12/2021
Pest Management Plan (PMP) for the all the components of the IWMF-10R, Hazardous waste Treatment and disposal Facility. Electronic waste management plan for the safe disposal/treatment /reuse of electric buses Batteries.	12/2021
Infection Prevention and Control and Waste Management Plan (IPC&WMP) according to the EHSGs, and other relevant Good International Industry Practice (GIIP) including relevant WHO guidelines on COVID-19 component , in a manner acceptable to the Bank.	06/2021
ESS 4 Community Health and Safety	
TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under ESS1 Prepare, adopt and implement, A Road Safety Plan for the e-buses to be procured	03/2021
Measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including behavior of Project workers, risks of labor influx, risk related to GBV and SEA/SH.	06/2022
Emergency Response Plan, road safety, construction-related risks, community health risks related to locations of transfer stations, required in the ESMPs. GBV action plan, Emergency Response Plan, plan for the use of security personnel.	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Implement the cleared Resettlement Framework. Resettlement plans and livelihoods restoration plans according to the already prepared RF for all project-related components and/or specific ESIA requirements.	03/2022
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
Prepare, adopt, and implement the chance finds procedure are to be complimentary to the different ESIAs and ESMPs to be prepared under actions 1.2 above for the different project components and included in contractor's contracts	03/2021

ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where "Use of Borrower Framework" is being considered:

Using Borrower framework is not considered.

IV. CONTACT POINTS

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Implementing Agency(ies)

Implementing Agency: Ministry of Environment

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VI. APPROVAL

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Practice Manager (ENR/Social)	Pia Peeters Cleared on 23-Jul-2020 at 21:01:16 EDT
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 28-May-2020 at 10:29:5 EDT