

E4415 V2

# Emergency Employment Investment Project (EEIP)



## Environmental Management Plan for Cleanliness Campaigns and Waste Removal Sub-Projects

January 2014

## List of Acronyms

<b>CAA</b>	Competent Administrative Agency
<b>EEAA</b>	Egyptian Environmental Affairs Agency
<b>EIA</b>	Environmental Impact Assessment
<b>EEIP</b>	Emergency Employment Investment Project
<b>EMP</b>	Environmental Management Plan
<b>ESSAF</b>	Environmental and Social Screening and Assessment Framework
<b>EU</b>	European Union
<b>GoE</b>	Government of Egypt
<b>IAs</b>	Intermediate Agencies
<b>NGOs</b>	None Governmental Organizations
<b>PIU</b>	Project Implementaion Unit
<b>PPE</b>	Personal Protection Equipment
<b>SA</b>	Sponsoring Agencies
<b>SFD</b>	Social Fund for Development
<b>WB</b>	The World Bank

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# 1 Introduction

The Emergency Employment Investment Project (EEIP) was signed between the EU and the GoE on July 2013 and the administrative agreement was signed between the EU and the World Bank on December 2013, the project is funded by the EU and being implemented by the Social Fund for Development (SFD) with support from the World Bank (WB). The objectives of the project are to create short-term employment opportunities for unemployed unskilled and semi-skilled workers and to provide access to basic infrastructure services to the target population in poor areas. Many sub-projects will be implemented under the EEIP umbrella in different sectors including: rehabilitation of houses and schools, canal cleaning and weeds reduction, River Nile bank protection, surfacing and completing rural roads, cleanliness campaigns and waste collection from villages, early childhood education services, outreach of maternal and child health and youth employment in rural and urban settings. The implementing agency of the project is SFD who will sign agreements with Sponsoring Agencies (Ministries, Governorates and NGOs in corresponding sectors) for the execution of the project in different Governorates.

During the project appraisal an Environmental and Social Screening and Assessment Framework (ESSAF) has been prepared for the EEIP. The ESSAF has concluded that all the project's interventions fall into Category B or Category C according to the World Bank Environmental Assessment Safeguard Policy (OP 4.01). None of the other nine Environmental and Social Safeguard policies will be triggered according to the ESSAF. The ESSAF has been consulted with different stakeholders during March 2012.

The Loan Agreement between the SFD and the WB has stipulated that in the event that the ESSAF requires the preparation of an EIA/EMP, and/or Environmental Safeguard Guidelines specific for each type of sub-projects such documents should be prepared according to the type of sub-projects and expected environmental impacts.

The Cleanliness Campaigns and Waste Collection sub-projects, subject of this Environmental Management Plan (EMP), are considered to be associated with some environmental issues that require to be considered during the implementation of these sub-projects. This EMP was prepared in response to the Loan Agreement requirements, so that any negative impacts could be adequately managed by the project stakeholders. The EMP shall fulfill the following objectives

- Identify the environmental issues and assess their significance
- Identify mitigation measures that should be taken to minimize negative environmental impacts
- Identify monitoring activities that should be carried out to ensure that negative environmental impacts are controlled during the project implementation
- Identify roles of different stakeholders for implementing mitigation measures and monitoring activities.

## 2 Description of the Sub-Projects

Solid waste collection, transfer and disposal is one of the major environmental challenges in Egypt. Solid waste management has been identified as one of the priority issues in the National Environmental Action Plan, and is a repeated priority issue in almost all of the Governorate Environmental Action Plans. Solid waste collection and management services do not cover many parts of the country especially rural areas, which has caused the accumulation of solid waste in open areas accessible to the public such as vacant lands, banks of canals and drains and sides of roads and railways. The burning of accumulated solid waste is a common practice so as the neighbors of locations where solid waste is accumulated find this as an immediate solution to clear the area and to mitigate other problems of waste such as offensive odors, attraction of insects and rodents.

Cleanliness campaigns and solid waste collection in villages are usually done by Non Governmental Organizations (NGOs) as local service to the community to remove accumulated waste and to raise the awareness of proper waste management practices. The inclusion of Cleanliness Campaigns and Solid Waste Collection among the EEIP sub-projects will achieve a double purpose, in addition to recruiting relatively large number of workers, the project will achieve improvement in cleanliness conditions in a number of villages and, hence, will lead to improving living conditions to the poor rural community.

The Cleanliness Campaigns and Solid Waste Collection sub-projects will be implemented in 126 districts in 15 Governorates, with a total cost of about L.E. 78 millions, in which about 70% will be wages to workers.

The sub-projects will include two main components: the first is the waste collection and streets cleaning and beautification, in which the standard procedures comprise:

- Identification of the locations where major waste quantities are accumulated
- Recruitment of labor who will manually load the waste to waste vehicles, which in most cases will be a Local Authority tractor and trailer
- Tip the waste at the disposal site
- Some of the sub-projects will include tree planting for beautification

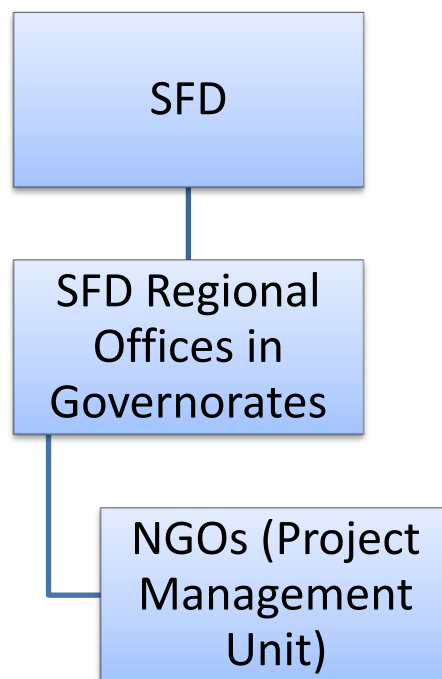
The second component is awareness campaigns that will be implemented parallel to the cleanliness campaigns. The awareness campaigns aim at raising the awareness of the local community about the environmental benefits of adequate solid waste management and the associated health aspects. These awareness campaigns will mainly include:

- Conducting seminars for the local community that will indicate importance of solid waste management
- Training of women rural pioneers so that they will be able to conduct home visits to raise the awareness of women at homes.

It is worth noting that some of the projects will include a continuation of the waste collection activities which will be financed by a service charge that will be collected from the beneficiaries in a separate fund.

The SFD selects the project locations (villages) according to certain poverty indicators, so that priority projects will be based on actual needs. After selecting the locations the SFD requests proposal from local NGOs and selects the candidate NGO according to certain tendering procedure. Selected NGOs will sign sub-project contracts with the SFD, the selected NGO will be required to assign a project management unit, this unit will be headed by a candidate who will report to the SFD. The expected scheme for implementing the project is shown in Figure 2-1 below.

**Figure 2-1 Organizational chart for the sub-project implementation**



### **3 Expected Issues, Correspondent Mitigation Measures and Monitoring Activities**

#### **3.1 Improvement of Environmental and Health conditions**

The overall environmental and social impacts of the Cleanliness Campaigns and Waste Collection sub-projects are expected to be positive. The removal of accumulated waste will result in direct environmental and health benefits including:

- Reduced negative impacts of odors effecting neighbors of waste accumulation locations
- Reduced risks of open burning of waste and the resulting impacts on air quality
- Reduced habitat area of harmful insects, rodents and disease vectors.
- Improved aesthetic value of the project locations
- Reduced risk of leaching liquids to surface water bodies and groundwater aquifers
- Improved efficiency of land-use
- Increased green areas and plant cover

The significance of these benefits will be according to the location of the sub-project, the quantities and impacts of accumulated waste and the proximity of sensitive receptors. The sub-projects will also achieve many socio-economic benefits through recruitment of unskilled labor, strengthening of local NGOs and improving the real state value in cleaned areas. The EEIP is mainly targeting socioeconomic benefits through emergency interventions; therefore, it is believed that the EMP should keep track and document achieved environmental and social benefits. This documentation should be using simple tools so as to be practically and effectively achieved. This is reflected in the following measures and monitoring activities:

Measures for documenting environmental benefits:

- The NGOs should document the locations of waste accumulation through photography before and after the waste removal, and also before and after tree-planting
- During the awareness campaign and the home visits carried out by women pioneers, the views of the local community about the impacts of the accumulated waste and their perception about the improvements done by removing the waste should be recorded. The NGOs should make sure that the views the local community about the above environmental aspects should be documented in a seminar report.

Also the following monitoring indicators should be recorded for each village:

- The NGOs should record amount of waste removed in each sub-project. This would be estimated through calculating the volume capacity of the waste vehicle and the number of waste trips transferred to the disposal site.

- The number of beneficiaries from the project in terms of number of person-days of labor recruited by the project. This is expected to be covered within the project achievements mentioned in the quarterly progress reports, however, it is also recommended to be within the EMP reporting section
- In case the waste collection will continue in a certain village after the end of the EEIP intervention, through self-financing from inhabitants, the number of beneficiary households that expressed interest in participating in a permanent system need to be recorded by the NGO at the end of their campaign in this village.
- Number of trees planted at each village, which could be documented from the purchased trees receipts

### **3.2 Fulfillment of EEAA Requirements for EIA Forms**

The sub-projects should comply with the requirements of the Egyptian Environmental Affairs Agency (EEAA) regarding preparation of EIA. EEAA has issued updated Guidelines for the rules and procedures of undertaking EIAs, in which projects are classified to 3 classes of EIAs according to their expected impacts on the environment, which are Class A, B, and C ascending respectively from lower to higher impacts on the environment<sup>1</sup>. The Guidelines gave some examples of the required class of EIA but none of these examples were related to cleanliness campaigns and solid waste collection. The Guidelines indicate that projects that are not among the given examples should be classified according to the consumption of resources, the type of project and the expected change on land use, type of inputs/outputs and extent of corresponding environmental impacts and the geographic extent of the impacts. Because of the limited scale of works expected in the Cleanliness Campaigns and Waste Collection sub-projects, and their temporary nature in most cases the classification of such projects could be Class A or Class B, and there is also a possibility that no EIA Form would be required. The SFD will be required to check this with EEAA during an early stage of the project and receives an official letter from EEAA advising on the proper class of these sub-projects<sup>2</sup>. In case that a certain Form would be required, the NGOs should be advised to prepare and submit the EIA Form timely to EEAA and follow-up their feedback. This is reflected in the following measures:

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<sup>1</sup> Class A is equivalent to Category C in the WB screening of projects according to OP.4.01, Class B is equivalent to Category B and Class C is equivalent to Category A

<sup>2</sup> The Guidelines require project proponents to consult with EEAA for classifying projects that are not among the given examples so as to ensure proper classification, the Guidelines indicate that EEAA should respond in writing to such consultation request



Measures for ensuring the fulfillment of EEAA requirements:

- The SFD should send an official letter to EEAA requesting advise whether an EIA Form is required for these types of sub-projects, and what is the required Form, this should be carried out as soon as possible.
- In case EEAA requires preparation of a certain EIA Form, a copy from EEAA should be circulated to the NGOs implementing the sub-projects, and this should be added to the contracts with NGOs as part of their commitments.
- The NGOs should prepare the appropriate EIA Form, if required; submit it to the Competent Administrative Agency (CAA) and follow-up EEAA feedback on the forms. Any conditional approval of EEAA on the projects should be part of the NGO commitment.

The implementation of these measures does not require monitoring of measurable indicators; it would be followed up through the reporting procedure.

### **3.3 Risk of Causing Unplanned Accumulations of Waste**

In many cases, where the waste disposal practices are not standardized and monitored, making short cuts and tipping off the waste at an unplanned disposal point is tempting to many waste vehicles drivers as this saves times and fuel. This has probably been one of the factors that have historically contributed to accumulating waste at vacant lands, sides of roads and banks of watercourses.

Therefore it will be important to make sure that the removed waste accumulations will not be tipped off in another improper place.

The common practice of transferring waste is through uncovered vehicles. This practice, in addition that it violates the General Cleanliness Act 35/1967<sup>3</sup>, could cause unplanned littering of the collected waste in the way to the disposal site. Therefore it is recommended that the a cover should be available for each waste vehicle and that the vehicle should not move unless the workers have tightly covered the waste cargo box, or the trailer in case a tractor-trailer will be used.

In case the waste collection campaigns will include collection of household waste in some villages, the transfer points of waste should be identified before starting waste collections. The narrow alleys in villages usually are not suitable for waste vehicles to enter for waste collection, therefore, it would be expected that household waste bags should be manually placed in a transfer point in the vehicle route. In order to avoid accumulation of waste in new areas, it is recommended that transfer points should be at the existing waste accumulation points but there should be adequate waste containers at these points to receive new waste.

The following mitigation measures are recommended to minimize the above risk:

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<sup>3</sup> Act 14 of the Executive Regulations stipulates that the Vehicle should be with enough capacity, the integrity of the cargo box should be maintained and the waste should be covered during the transfer.

- Each NGO should officially request the Local Authority to identify the disposal site where collected waste should be transferred to, the NGO should keep a document (letter or Memo) from the Local Authority including the name of the disposal site.
- During the field work, the NGO should make sure that the capacity of the waste vehicle is suitable to the amount of transferred waste; the waste at the cargo box is tightly covered before the vehicle starts moving towards the disposal site and that the truck driver will actually tip off the waste at the disposal site. A staff member from the NGO should shadow the waste cargo procedure and make photographic documentation of the process, and the regional SFD offices should supervise selected sample from the sub-projects and report any violations.
- In case the cleanliness campaign comprises collection of new household waste besides the accumulated waste, transfer points of new waste should be identified prior to the start of cleanliness campaigns, the location of these points is preferably at existing waste accumulation points and suitable waste bins should be available at these points. The NGO should instruct the local households to place their waste in the bins at the identified transfer points. Regional SFD offices should supervise selected sample from the sub-projects that will include collection of new household waste and report any violations.

Monitoring of the effectiveness of implementing the above measures will be through:

- Preparing a complaint log at the NGO premises allowing villagers to complain about any unauthorized disposal of the waste collected by the sub-projects, any littering of waste during transfer and generation of new waste accumulation areas. The complaint receiving procedures (complaint box or other means) will be left to the NGO to decide according to the local conditions

### **3.4 Risks of Handling Hazardous Waste**

Usually domestic household waste includes minor amounts of hazardous waste such as batteries, broken florescent lamps, medicine drug bottles, containers of paints, household healthcare waste, containers of detergent, pesticides, oil contaminated cloth... etc. The amounts of such components are much higher in urban and city waste than villages' waste, especially in poor areas where most of the recyclables are not wasted. Usually it is impractical to segregate these components from domestic household waste. In the project areas, where cleanliness campaigns will be implemented mainly in villages, the waste will mainly comprise organic waste, some agriculture waste (such as sugar cane waste especially in Upper Egypt) and minor amounts of other components, and the waste may still include some hazardous components that could be associated with the following risks:

- Risk of generating leachate with chemical constituents from alkaline batteries, car batteries, or containers of paints, chemicals and medical drugs at the disposal site. However, the

expected risk from such leach is expected to be minimum, or even negligible, because such components are expected to be of very low quantities. Also the leaching risk is higher at the current locations of accumulated waste (before implementation of the sub-projects) because these locations were not basically allocated for waste disposal, therefore the additional risk/impact of the sub-projects could be regarded as negligible.

- Risk of workers being injured from wasted sharps such as broken glass or medical needles, which poses infection risk. Again, such objects, if existing, are of minimum quantities and the risk could be minimized if the workers are equipped with suitable Personal Protective Equipment (PPE) including thick anti-puncture gloves. Some workers resist using PPEs especially during hot weather, however, the NGOs should provide the PPE as part of the project budget and make using the PPE a condition for contracting the workers.

The following mitigation measures are recommended to minimize the above risks:

- The NGOs should provide suitable PPE (at the minimum anti-puncture gloves, masks and shoes) and instruct workers to use them during handling the waste; this should be a contractual condition with the workers. A staff member of the NGO should shadow the waste removal process, as mentioned earlier, to ensure compliance with this condition, and should document the process through photography. Regional SFD offices should supervise selected sample from the sub-projects and report any violations.
- In case of a worker has been injured by the waste being handled the NGO should promptly provide proper medical care to the injured worker and report on the accident reasons and actions taken.
- The NGOs should instruct the workers to adopt proper hygienic instructions such as washing after the working day, and washing hands before eating.

Monitoring of the effectiveness of implementing the above measures will be through:

- Recording number of accidents happened due to handling the waste

### **3.5 Dust and noise**

The removal of accumulated waste and loading/unloading the waste vehicles and will cause generation of dust at these locations. However, because the labor-intensive process, which will depend on manual loading of waste, the amounts of generated dust will be relatively low in intensity but may be longer in duration. This pattern of dust generation will have less impacts on neighboring areas but will have more effects on the waste workers, therefore putting on dust masks, as indicated previously in this EMP, will minimize these risks.

The dust emissions during waste transportation will be avoided if the waste has been covered as mentioned earlier in this EMP. In all cases dust emissions during transportation is relatively low except if the waste includes large rations from construction and demolition waste.

It is worth noting that suppressing dust emissions by water spraying will be undesirable as this will increase the moisture content of the waste and may cause some leachate problems at the site where the waste has been removed from and at the site where the waste will be disposed in. It is believed that this disadvantage will outweigh the impacts of limited dust emissions especially if the workers are protected by dust masks.

The noise emissions of the process will also be relatively low as machine noise will be limited to the waste vehicles. Loader and excavators which generate high levels of noise are not among the components of the project. Noise levels may slightly rise relatively due to voices of large number of workers, but this is not expected to have considerable impact on the background noise except if the process takes place during nighttime.

The following mitigation measures are recommended to minimize the above risks:

- The PPE provided to the workers should include a mask, a staff member of the NGO should shadow the waste removal process to ensure compliance with this condition, and should document the process through photography. Regional SFD offices should supervise selected sample from the sub-projects and report any violations.
- Waste should be covered during transportation by a tight cover, the NGO shadow will make sure that this will be implemented and will document it by photography, and Regional SFD offices will supervise sample from the sub-projects and report any violations.
- Waste removal should only be carried out during daytime, and night work is not allowed.

Monitoring of the effectiveness of implementing the above measures will be through:

- Preparing a complaint log at the NGO premises allowing villagers to complain about unacceptable dust or noise during collection and transfer of waste.

### **3.6 Other Issues that do need Intervention from the EMP**

There are other issues that are considered beyond the scope of this EMP for different reasons as discussed below.

There are many issues that will be associated with tipping off the waste at authorized disposal sites including adding to the odor emissions, dust emissions, noise emissions, waste decomposition effects, effects on the site waste capacity ... etc. These issues are considered to be related to selecting the disposal site by the Local Authority and not directly related to the sub-projects. It is

believed that the contribution of the sub-projects to the environmental impacts at the disposal site is negligible and does not require special measures to be implemented through this EMP.

Another issue is related to the sustainability of the sub-projects after the end of the cleanliness campaign. If the costs of continuing waste collection process are not covered by other funding sources, such as collecting service fees from beneficiaries, waste may accumulate again in the locations where it has been removed from or in other places. Although this issue may cause downgrading of environmental and public health conditions after the end of sub-projects, such impacts cannot be related to the implementation of the sub-projects but will rather be related lack of sustainable solid waste management system in these areas. Given emergency nature of the EEIP and its rationale of generating work opportunities besides giving access to infrastructure services, the scope of the project should not expand to cover providing sustainable solid waste management systems. Generally the impact of the sub-projects regarding solid waste aspects is positive, as discussed earlier, and will demonstrate the benefits of waste management so that local communities at served villages may be motivated to establish a sustainable system by themselves after the end of the project. Accordingly no further EMP measures are needed to cover this issue.

Tables Table 3-1 and Table 3-2 below summarize the responsibilities for implementation and supervision of the EMP mitigation measures and monitoring activities.

**Table 3-1: Responsibilities for implementation and supervision of the mitigation measures**

<b>Issue</b>	<b>Proposed Mitigation Measures</b>	<b>Responsibility for Implementation</b>	<b>Responsibility of direct supervision</b>	<b>Means of supervision</b>
Documenting environmental benefits	Document locations of waste accumulation removed and trees planted	NGOs	SFD Regional Office	Review progress reports and photographic documentation
	Record and document views of the local community	NGOs	SFD Regional Office	Review campaign reports
Fulfillment of EEAA EIA requirements	Request official advise from EEAA whether the subprojects will require EIA Form, and what type of Form if required	SFD	SFD	Review correspondence with EEAA
	In case an EIA Form is required, the preparation of the Form should be added to the commitments of the NGOs in the contract	SFD	SFD	Review contracts with NGOs
	In case an EIA Form is required, the NGO should timely prepare the Form and follow up EEAA feedback	NGOs	SFD Regional Office	Review correspondence with EEAA
Risk of causing unplanned accumulations of waste	Request official advise from the Local Authority for identifying the authorized disposal site	NGOs	SFD Regional Office	Review correspondence with the Local Authority
	Containment of the waste in the cargo box, placing a tight cover during transportation and tipping the waste at the designated disposal site	Waste vehicle staff	NGOs and SFD Regional Offices	Field supervision and photographic documentation by NGO, and from SFD for sample sub-projects

Issue	Proposed Mitigation Measures	Responsibility for Implementation	Responsibility of direct supervision	Means of supervision
	Select suitable transfer points for collecting new waste, provide suitable bins at these locations and advise households about transfer points	NGOs	SFD Regional Offices	Field supervision for sample sub-projects
Risk of handling hazardous waste	Worker handling the waste should use adequate PPE	Waste workers	NGOs and SFD Regional Offices	Field supervision and photographic documentation by NGO, and from SFD for sample sub-projects
	Adequately manage accidents related to waste handling, through providing suitable medical care and to report the accident	NGOs	SFD Regional Offices	Review accidents reports
	Instruct workers about proper hygienic practices after handling the waste	NGOs	SFD Regional Offices	Field supervision for sample sub-projects
Dust and noise	Worker handling the waste should use adequate PPE	Waste workers	NGOs and SFD Regional Offices	Field supervision and photographic documentation by NGO, and from SFD for sample sub-projects
	Waste should be covered during transportation	Waste vehicle staff	NGOs and SFD Regional Offices	Field supervision and photographic documentation by NGO, and from SFD for sample sub-projects
	Waste removal should not be carried out during nighttime	NGOs	SFD Regional Offices	Field supervision for sample sub-projects

**Table 3-2: Responsibilities for implementation of the monitoring activities measures**

<b>Issue</b>	<b>Monitoring Indicator</b>	<b>Monitoring Location</b>	<b>Monitoring Methods</b>	<b>Monitoring Frequency</b>	<b>Monitoring Responsibility</b>
Documenting environmental benefits	Volume of waste transferred to disposal site	Waste accumulation sites	Counting number of vehicles trips and multiply by vehicle capacity	At the end of campaign at each village	NGOs
	Number of person-days of utilized labor	NGO premises	Recording the number from workers payment records	At the end of campaign at each village	NGOs
	Number of households interested in continuing the service	NGO premises	Recording the number from service charge payment records	At the end of campaign at each village	NGOs
	Number of planted trees	NGO premises	Recording number of purchased trees	At the end of campaign at each village	NGOs
Risk of causing unplanned accumulations of waste	Number of received complaints	NGO premises	Recording number of received complaints	At the end of campaign at each village	NGOs
Risk of handling hazardous waste	Number of accidents related to waste handling	NGO premises	Recording number of accidents	At the end of campaign at each village	NGOs
Noise and dust	Number of received complaints	NGO premises	Recording number of received complaints	At the end of campaign at each village	NGOs



## **4 Administrative Framework for Implementing the EMP**

### **4.1 Implementation Responsibilities**

Table 3-1 and Table 3-2 indicate the responsibilities for implementation and supervision of the EMP measures which mainly falls on the NGOs, drivers and waste workers and SFD offices. The responsibilities of the NGOs should be reflected in their contracts with the SFD; Annex 1 indicates these responsibilities in form that could be attached to these contracts. The NGOs should report the implemented EMP measures and activities carried out on quarterly basis. This report will include locations where waste accumulations have been removed, a concise description of the views of the local communities (with seminar reports annexed), the identified location of the disposal site (with any letter or memo from the Local Authority attached), recorded violations/complaints, a photographic documentation of the process and the recording of the monitoring indicators. An example of the NGO report is indicated in Annex 2. The report comprises basically a checklist of the measures that should be taken by the NGO during the campaign.

SFD Regional Offices will be required to prepare a progress report on quarterly basis and submit it to the SFD. The report will include a section on the EMP that will comprise an indication on any violations carried out by the NGOs and the actions taken in response to any recorded violations. These violations will be either detected through review of NGO reports, or during field supervision of a sample of the sub-project. The quarterly report should attach NGO reports and should also include the correspondence with EEAA for identifying the classification of sub-projects in terms of preparing EIAs. An Example from the quarterly report that should be prepared by SFD Regional Offices is presented in Annex 3.

### **4.2 Training needs**

The EMP measures are mainly managerial and administrative measures that do not require a special technical expertise. There are no actions that require input from an external professional entity for carrying out sampling or analysis of environmental quality parameters or carrying out detailed site reconnaissance visits. It will be required to provide an orientation session to SFD Regional Offices staff members who will manage the project to explain the requirements of the EMP, the contract conditions, supervisions activities on NGOs that should be undertaken and the reporting requirements.

The SFD Regional Offices staff members will instruct NGOs representatives about their responsibilities by including these instructions in the tender document, by including them in the

contract, by guiding them during the actual implementation and by following up their reports. It is expected that NGOs will have sufficient capacity to effectively comply with their responsibilities and this will be evident through the tenders that they will submit.

### **4.3 EMP Budget**

Most of the mitigation measures and monitoring activities are managerial and administrative procedures that do not entail additional costs to the original project budget, such procedures could be carried out by the project staff after being briefed and instructed about the reporting and documentation requirements. The only items that may require additional costs are:

- Providing covers for the waste vehicles
- Providing adequate PPE for the waste workers
- Waste bins that will serve the purpose of collecting new waste from households
- Providing digital camera for photographic documentation of the procedure

These items will only cause minor impact on the project budget; however, they should be included among the responsibilities of the NGOs on the tendering procedure and on the signed contracts with them.

## 5 Consultation with Stakeholders

The ESSAF has been consulted with stakeholders during the project appraisal stage; a consultation workshop has been conducted on March 2012. However, it has been recommended that this EMP should also be consulted with local stakeholders so that their feedback could be included in the Final EMP.

A newspaper advertisement has been published in Al Ahram newspaper on 26 May 2013, the advertisement is presented in Annex 4, requesting different stakeholders and interested bodies and individuals to give their comments and feedback on the EMP, the advertisement indicated that the EMPs, Arabic version, were available in the SFD Offices in the Governorates and the documents are also disclosed on the SFD website. The advertisement gave 10 days for receiving comments. Further to Al Ahram advertisement, the request for reviewing the EMPs has also been published by:

- Placing the advertisement on the bulletin boards of the SFD offices, Governorates, City Councils, different Directorates, NGOs, youth centers, agriculture societies and Administrations of Environment.
- Sending targeted letters, requesting comments on the EMPs, to some stakeholders, such as Governorates Secretary Generals, Heads of City Councils, universities, media centers, Directorates, NGOs

The feedback on the EMPs has been collected after 6 June 2013 from SFD Offices. The comments on the EMPs were basically emphasizing on the importance of the sub-projects in reducing unemployment rates. No suggestions or modifications were received on the EMP measures.

## Annex 1: Responsibilities of the NGO in Implementing the EMP

The NGO should comply with the following environmental conditions:

- *(Note: This article should be removed if EEAA advised that no EIA Form is required for these subprojects).* The NGO should prepare EIA Form ---- (please specify according to EEAA requirement) submit it to the CAA, follow-up feedback of EEAA and send the final opinion of EEAA about the EIA Form to the SFD. The Campaign should not start prior to getting an approval from EEAA on the sub-project, and the conditions stated in EEAA approval are integral part of the NGO commitments in this contract.
- Collected wastes should be transferred only to \_\_\_(to be filled according to location)\_\_\_\_\_ disposal site which is approved by the local authority.
- The NGO should provide an appropriate cover to the waste vehicle and should not allow the vehicle to move without cover
- The NGO should provide for each waste worker a dust mask, anti-puncture gloves, adequate shoes and other PPE as appropriate. The NGO is responsible for ensuring that the workers are using appropriate PPE during the process. The NGO should instruct workers about adequate hygienic practices that should be taken during and after the campaign
- In case the campaign will include collecting new waste from households, adequate waste bins should be provided and distributed in waste collection points. These points should be on the vehicle route and preferably be at the locations of existing waste accumulations
- No waste removal activities should take place during nighttime
- The NGO should prepare a quarterly report documenting the implemented measures of the EMP. The report should be according to the format annexed to this contract, in which all questions should be answered.
- The NGO should document locations of waste removed and trees planted, keep records of the amount of waste removed, trees planted and number and type of person days utilized in the project according to the requirements of the campaign report
- The NGO should keep record of the views of the local community about the sub-project according to the requirements of the campaign report.
- The NGO should provide sufficient field supervision, by nominated staff members, for all activities of the campaign, including waste collection, transfer and disposal
- The NGO should carry out photographic documentation according to the requirements of the campaign report
- The NGO should prepare a complaints log that will include complaints from local community according to the requirements of the campaign report
- The NGO should prepare an accident report according to the requirements of the campaign report
- Except for cases that are beyond the NGO control, abiding to these conditions is a prerequisite for settling the contractor's payment on the work.

**Annex 2: Standard EMP Report to be prepared by the NGO and Submitted to SFD Regional Offices on Quarterly Basis**

<p><b>NGO information</b></p>	<p>Name of NGO: -----          Address: -----          -----          Served village(s): -----          -----          Start and end date of the campaign:          -----          Person prepared the report (please sign): -----          Date of the report: -----</p>
<p><b>Locations of sub-project</b></p>	<p>Please state the address of the locations where the sub-project has been implemented:</p> <p>Removal of waste accumulations locations</p> <p>1. -----(describe address)          2. -----(describe address)          3. -----(describe address)          4. -----(describe address)</p> <p>Tree plantation locations:</p> <p>1. -----(describe address)          2. -----(describe address)          3. -----(describe address)          4. -----(describe address)</p>
<p><b>EEAA requirements (to be included if instructed by SFD)</b></p>	<p>Is the EIA form submitted to the CAA attached to this report? If no please state the reason          -----          -----</p> <p>Is the response of EEAA attached to this report? If no please state the reason          -----          -----</p> <p>If EEAA granted a conditional approval of the EIA form, please describe the actions taken to fulfill these conditions          -----          -----          -----          -----</p>

<p><b>Approval of the disposal site</b></p>	<p>Is an official letter/memo from the Local Authority indicating the name of the authorized disposal site attached to this report? If no please state the reason</p> <p>-----</p> <p>-----</p>
<p><b>Site supervision of the sub-project</b></p>	<p>Please state the name of the NGO staff that has been supervising the site work</p> <p>-----</p> <p>Please specify the dates and times where work has been carried out in the above locations</p> <p>1. -----(date/time)</p> <p>2. -----( date/time)</p> <p>3. -----( date/time)</p> <p>4. -----( date/time)</p> <p>Please check the following according to site supervision observations:</p> <ul style="list-style-type: none"> <li>- Was the waste vehicle covered before transportation? If no please state reason and actions taken</li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>- Were the workers wearing PPE (masks, thick gloves and shoes)? If no please state reason and actions taken</li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>- Has been there collection of new waste from households? If yes please describe the locations of transfer points (describe address and whether it is a new location or in areas of accumulated waste)</li> </ul> <p>1. -----</p> <p>2. -----</p> <p>3. -----</p> <p>4. -----</p> <ul style="list-style-type: none"> <li>- If the answer to the previous question is yes, has the transfer points provided with waste bins? If no please state the reason</li> </ul> <p>-----</p> <p>-----</p> <ul style="list-style-type: none"> <li>- Was the waste disposed at the authorized disposal site? If no please state reason and actions taken</li> </ul> <p>-----</p>

<p><b>Photographic documentation</b></p>	<p>Is a photographic documentation for the above sites before and after implementing the sub-project attached to this report? If no please state the reason</p> <p>-----</p> <p>-----</p> <p>Is the photographic documentation for the following activities attached?</p> <ul style="list-style-type: none"> <li>- Waste vehicle covered before moving to the disposal site? If no please state the reason</li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>- Workers wearing PPE during waste handling? If no please state the reason</li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>- Transfer points provided with waste bins? If no please state the reason</li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>- Waste being tipped off at the disposal site? If no please state the reason</li> </ul> <p>-----</p>
<p><b>Views of local community</b></p>	<p>Has an awareness seminar conducted for the sub-project? If yes please briefly state the issues raised during the seminar?</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>Is the seminar report attached? If no please state the reason</p> <p>-----</p> <p>-----</p> <p>Has there been home visits by women pioneers? If yes please briefly state the issues raised during the visits?</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>-----</p>

<p><b>Complaints log</b></p>	<p>Has there been any complaints received from the local community regarding:</p> <ul style="list-style-type: none"> <li>- Unauthorized disposal of waste? If yes for each complaint please fill the following</li> </ul> <p>Name of the complainer: -----  Location of complaints: -----  Date of the complaint: -----  Actions taken in response: -----</p> <ul style="list-style-type: none"> <li>- Unacceptable dust generation? If yes for each complaint please fill the following</li> </ul> <p>Name of the complainer: -----  Location of complaints: -----  Date of the complaint: -----  Actions taken in response: -----</p> <ul style="list-style-type: none"> <li>- Work over night? If yes for each complaint please fill the following</li> </ul> <p>Name of the complainer: -----  Location of complaints: -----  Date of the complaint: -----  Actions taken in response: -----</p>
<p><b>Accidents log</b></p>	<p>Has there been any accident related to handling of waste? If yes for each accident please fill the following:</p> <p>Name of the injured worker: -----  Location, date and time of the accident: -----  Type of waste that has caused the accident: -----  Was the worker wearing PPE, if no please state the reason:-----  Reason of the accident: -----  Actions taken in response: -----</p>
<p><b>Monitoring activities</b></p>	<p>Volume of waste been transferred to the disposal site: please fill the following</p> <p>Type of waste vehicle: -----  Capacity of waste vehicle (m3): -----  Number of trips to the disposal site: -----  Total volume of waste transferred: -----</p> <p>Number of person days of worker:</p> <p>NGO staff: -----  Waste workers: -----  Drivers: -----  Women pioneers: -----  Trainers: -----</p> <p>Number of households interested in paying for sustainable solid waste service:  -----</p> <p>Number of trees planted:  -----</p>



### Annex 3: Standard EMP Progress Report to be prepared by the SFD Regional Offices

Project Code:		SFD Branch Office:			Report Date:	
No.	Project location:	NGO Name	Project status		Violation	Action Taken
			Start date	End date		
1						
2						
3						
4						
5						
6						

Please attach the following:

- Correspondence with EEAA regarding preparation of EIAs
- Reports submitted by NGOs including their attachments (standard report is shown in Annex 2)

Annex 4: Consultation advertisement published on Al Ahram Newspaper  
on 26 May 2013



**SFD** الصندوق الاجتماعي للتنمية  
Social Fund for Development

### دعوة لإبداء الرأي بشأن خطط الإدارة البيئية لمشروعات البرنامج العاجل للتشغيل كثيف العمالة

يقوم الصندوق الاجتماعي للتنمية حالياً بتنفيذ البرنامج العاجل للتشغيل كثيف العمالة (ELIIP) بالتعاون مع البنك الدولي في محافظات جمهورية مصر العربية حيث يتم تنفيذ مشروعات ومبادرات تنموية تستخدم أساليب ومنهجية العمالة الكثيفة بغرض توفير أكبر عدد ممكن من فرص التشغيل للشباب والشابات.

وقد قام الصندوق الاجتماعي للتنمية بإعداد خطط عمل بيئية في القطاعات التالية:

المحافظات	القطاعات
أسوان - الأقصر - قنا - سوهاج - أسيوط - المنيا - بنى سويف المنوفية - البحيرة - كفر الشيخ	حماية جوانب نهر النيل
أسوان - الأقصر - قنا - سوهاج - أسيوط - المنيا - بنى سويف الفيوم - الشرقية - البحيرة - المنوفية - الغربية - الدقهلية	رصف وتمهيد الطرق الريفية
سوهاج - أسيوط - الفيوم - بنى سويف - الشرقية - قنا - المنوفية المنيا - البحيرة - الدقهلية - الأقصر - أسوان - شمال سيناء مطروح - الجيزة	حملات النظافة والتشجير بالقرى

في هذا الصدد، يتشرف الصندوق الاجتماعي للتنمية بدعوة الجهات المختلفة وعموم المواطنين بالمحافظات المعنية لإبداء الرأي بشأن مسودات خطط الإدارة البيئية في خلال (١٠) أيام من تاريخ هذا الإعلان وذلك عن طريق إرسال/تقديم الملاحظات للمكاتب الإقليمية للصندوق الاجتماعي للتنمية بالمحافظات المعنية.

علماً بأن جميع مسودات الخطط المشار إليها يمكن الحصول عليها من خلال المكاتب الإقليمية للصندوق الاجتماعي للتنمية بالمحافظات المعنية أو عن طريق الدخول على البوابة الإلكترونية للصندوق الاجتماعي للتنمية: <http://www.sfdegypt.org/web/sfd/statistics>