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(EETC)

Submitted by:

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## Resettlement Action Plan (RAP)

New Gamasa GIS Substation and its  
interconnecting Overhead Transmission lines

**Final**

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## Abbreviations

EEHC	Egyptian Electricity Holding Company
EETC	Egyptian Electricity Transmission Company
EGP	Egyptian Pound
EIB	European Investment Bank
EMF	Electric Magnetic Field
FGD	Focus Group Discussions
IR	Involuntary Resettlement
OHTL	Over Head Transmission Line
OTL	Overhead Transmission Line
PAP	Project Affected Persons
PIU	Project implementation unit
RAP	Resettlement Action Plan
RoW	Right Of Way
RPF	Resettlement Policy Framework
TL	Transmission Line
WB	World Bank
GRM	Grievance and Redress Mechanism

1 Feddan is equivalent to 4200 m<sup>2</sup>

1 Qirate is equivalent to 175 m<sup>2</sup>

## Glossary

<b>Census</b>	Household survey that covers all Project Affected Persons irrespective of entitlement or ownership. It provides a complete inventory of all project affected persons and their assets. It can be used to minimize fraudulent claims made by people who move into the area affected by the project in the hope of being compensated and/or resettled.
<b>Compensation</b>	Payment in cash or in kind to replace losses of land, housing income, and other assets caused by the project.
<b>Cut-off Date</b>	<p>The date of the census prior to which, the occupation or use of the project area, qualifies residents or users of the project area as affected persons; when persons are not eligible for compensation or resettlement assistance</p> <p>Date of completion of the census and assets inventory of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance.</p>
<b>Environmental and Social Impact Assessment (ESIA)</b>	A systematic procedure for enabling the possible environmental and social impacts of development projects to be considered before a decision is made as to whether the project should be given approval to proceed.
<b>Grievance Redress Mechanism</b>	Dispute resolving mechanism that is available at the project level for persons affected under the project to submit project related grievances and to seek redress for these.
<b>Involuntary Resettlement (IR)</b>	The unavoidable displacement of people and/or impact on their livelihood, assets and common property resulting from development projects that create the need for rebuilding their livelihood, sources of income and asset bases. When it occurs without the informed consent or if they give their consent without having the power to refuse resettlement.
<b>Monitoring</b>	The process of repeated observations and measurements of environmental and social quality parameters to assess and enable changes over a period of time.

<b>Project Affected Person (PAPs) and Displaced persons</b>	<p>Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.</p> <p>That Refers to all the people who, on account of the activities listed above, would have their (1) standard of living adversely affected; or (2) right, title, interest in any house, land; (3) access to productive assets adversely affected, temporarily or permanently; or (4) business, occupation, work or place of residence or habitat adversely affected; and “displaced person” means any of the displaced persons.</p> <p>Includes any people, households, firms or private institutions who, on account of changes that result from the project will have their (i) standard of living adversely affected, (ii) right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently or temporarily; and/or (iii) business, occupation, place of work or residence, or habitat adversely affected, with or without displacement.</p> <p><b>Project-affected Household:</b> All members of a household, whether related or not, operating, as a single economic unit, who are affected by a project.</p>
<b>Resettlement Action Plan (RAP)</b>	<p>A time-bound action plan with a budget, setting out resettlement strategy, objectives, options, entitlements, actions, approvals, responsibilities, monitoring and evaluation. a document in which the project sponsor or other responsible entity specifies procedures that it will follow and the actions that it will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by an investment project</p>
<b>Right of Way</b>	<p>Relevant laws and guidelines require maintaining a suitable Right of Way (RoW) distance in order to maintain safety of the general public and minimize exposure to Electromagnetic Fields (EMFs). Thus, the EMFs would effectively attenuate at the edge of this RoW.</p> <p>According to the Electricity Law No.63 of year 1974, the RoW will constitute 25 m at each of the two sides of the transmission line which represent, also, the protection zone along the line route. The RoW should be cleared of both tall wooden trees and of buildings ranging higher than four meters</p>



<b>Social Impact</b>	An effect (both positive and negative) on a social issue resulting from infrastructure development projects.
<b>Stakeholders</b>	Those who have an interest in project development and who will be involved in the consultative process, and includes any individual or group affected by, or that believes it is affected by the project; and any individual or group that can play a significant role in shaping or affecting the project, either positively or negatively, including the host community/population.
<b>Vulnerable Groups</b>	Distinct groups of people who might suffer excessively from resettlement effects, such as, the old, the young, the persons with disabilities, the poor, isolated groups and single parents.

## Executive summary

### I. Description of the Project

In order to meet the steady increase in energy demand, the Egyptian expansion plan targeted to reinforce the national electricity network by adding more capacities and overhead transmission lines and underground cables by year 2018, this expansion is required for evacuation of power generated from the new power plants to the load centres.

The EETC is one of sixteen affiliated Companies under the Egyptian Electricity Holding Company (EEHC). The main role of the EEHC is the management, operation and maintenance of electric power transmission grids on extra high voltage and high voltage all over the country, for the optimal economic usage of those grids. EEHC's goal is to meet the growth in electricity demand while optimizing the use of all resources and maximizing the profit.

In response to the growing demand for electricity and in support for EEHC's plan to expand the existing electricity infrastructure of power stations, substations and interconnecting lines/cables, the European Investment Bank (EIB) is funding the construction of several substations in cooperation with the EETC.

In line with EIB environmental and social standards, EETC is committed to carrying out an ESIA of New Gamasa GIS Substation and its interconnecting OHTL to different existing substations and a Resettlement Action Plan (RAP) should the project activities trigger Egyptian legislations and/or EIB instruments relevant to resettlement.

The construction of New Gamasa GIS Substation and its overhead transmission line cable will evacuate and transmit the energy of New West Damietta power plant, provide system stability electricity service at Delta zone area by improving the voltage level, as well relieve the loading of the neighbouring substations in Delta Zone.

As part of the current project, the New Gamasa Substation will be connected to the national electricity network through 220 kV and 66/11 kV overhead transmission line, in addition improving the 220 kV network through construction new 220 kV network, modifying and extending current ones.

The main components of the project according to EETC technical specifications on 14/09/2014 are as following:

New Gamasa GIS Substation SS 220/66/11 kV (2x125+2x40 MVA), with the following scope

- 10 Bays of 220 kV GIS;
- 15 Bays of 66 kV GIS ;
- 3 sections of 11 kV;
- 2 Transformers;
- 2 compressors units; and
- Future expansion with 3<sup>rd</sup> transmitter 220/66 kv, 125 MVA and 3<sup>rd</sup> transmitter 66/11 kv, 40MVA.

As part of the current project, the New Gamasa GIS 220 kV Substation will be connected to the national electricity network through the following:

1. Construction of 220 kV overhead transmission line network with the following scope:
  - 220 kV, construction of OHTL double circuit Gamasa \ West Damietta power plant with approximately 10.5 km (IN/OUT)
  - 220 kV, construction of OHTL double circuit Gamasa \ TIBA Steel with approximately 3.5 km (IN/OUT)
2. Construction of 66 kV overhead transmission line network with the following scope:
  - 66 kV, OHTL double circuit AAAC 405 mm<sup>2</sup> Gamasa SS (the old one)/ Balteem and extending its length by approximately 2x 0.15 km (2x150 meters) (IN/OUT). This is the only OHTL of 66kV associated to New Gamasa SS. The line is already in existence and its route passes through state-owned land. The line consists of 2 towers which are constructed on allocated areas of the industrial zone, on which there is no economic activity. Consequently, no RAP study is anticipated for this OHTL.

According to the EETC project management department data; the timeframe for the Substation and OHTLs is 15 months. The construction of the OHTLs is due to commence after the conclusion of the RAP study.

## II. RAP Purpose and Objectives

It is a widely accepted fact, if the impacts of the project left unmitigated, involuntary resettlement under development projects may give rise to economic, social and environmental risks. The purpose of the Resettlement Action Plan (RAP) is to address any cases of involuntary resettlement that may arise, as well as to clarify the organizational arrangements that may be needed during different phases of the project preparation and implementation phases.

This includes compensating all Project Affected Persons (PAPs) for the loss of lands, properties, and livelihoods resulting from resettlement. The RAP may be triggered whenever any of the project's activities entail the acquisition of land and / or the displacement of people, causing the loss of land, property, assets, access (to land, property, and assets), income, or sources of livelihood.

The RAP has been prepared by conducting several consultation activities with concerned Governmental departments, PAPs, neighbouring communities and EETC, the preparation of the RAP is also based on the experience of EETC in other similar projects. The discussion with the concerned bodies included information about the Egyptian Laws, views on the application methods and timing of execution.

There is no involuntary resettlement induced by the substation; therefore, no RAP, ARAP or RPF is necessary for the SS. The project's impact is not significant, as it will be built on a land already affiliated to EETC and approved by the el Dakahlia Governorate. Consequently, insignificant impact is associated to land use; hence, no mitigation measures will be developed.

Due to the nature of impacts of the OHTLs (which are mainly impacts on crops and trees), there will be no transitional support activities. There will be no moving costs, temporary living allowance and payment of fees since there will be no physical resettlement of the PAPs.

### III. Resettlement Impacts

According to the site visits conducted along the route of the above-mentioned OHTLs, the impacts of the project will be limited to agriculture lands (includes loss of income to the farmers).as there are neither industrial, nor residential, nor commercial structures located along the route of the two OHTLs. The compensation for loss of crops and trees is considered as temporary<sup>1</sup> because it is limited to the construction phase. However, during the operation and maintenance phase, there are two types of compensation:

- Permanent<sup>2</sup> compensation will be for the land used by the towers after finishing the excavation and installation work; and
- Temporary compensation will be for the damaged lands impacted in case of maintenance activities.

The construction and operation phases will include potential impacts on agricultural lands during the following operations:

- Digging and the wiring process,
- Access roads-storage areas and foundation area,
- Maintenance of towers and lines

The civil works including the construction and operation phases will lead to some adverse impacts which are:

- Temporary loss of lands
- Related to the temporary loss of agricultural land; the crops and the trees located in the agricultural lands where the towers and overhead lines will be installed, for some agricultural seasons during the construction and operation stages

#### Summary of project impacts for Right-of-Way

Impact	Area affected (m²)	Use	Ownership	Number of crop holders	No. of PAPs		
					Owners	Tenants	No. family Members
220 kV OHTL New Gamasa SS \ West Damietta power							
Cultivated areas	16038 m²	Agricultural	Private³	115	73	42	452

<sup>1</sup> The average area of tower digging (in the construction phase) is 27 m x 27 m = 729m<sup>2</sup> per each tower, it is the total area of the land affected as a result of excavation and installation work of the OHTL.

<sup>2</sup>The total area needed for the 220kV tower is 7 m x 7 m=49 m<sup>2</sup>, and the total number of towers in the two OHTLs is 32. Therefore, the total affected area will be 49 x 32= 1568 m<sup>2</sup>

<sup>3</sup>Except for the land where tower no. 25 is constructed. It is a state-owned land “please see chapter 1 section 1.3 (220 kV OHTL New Gamasa SS \ West Damietta power)”

Uncultivated areas	7290 m <sup>2</sup>	Uncultivated	State-owned	None	None	None	None
<b>220 kV OHTL New Gamasa SS \ Tiba Steel</b>							
Cultivated areas	7290m <sup>2</sup>	Agricultural	Private	11	4	7	43
Uncultivated areas	1458 m <sup>2</sup>	Uncultivated	State-owned	None	None	None	None
<b>Total Impact</b>							
<b>Total Impacted Area</b>		<b>Crops/ Trees Compensation</b>		<b>Total Permanent Impacted Land</b>		<b>No. of PAPs (Family Members)</b>	
<b>Cultivated</b>	<b>Uncultivated</b>	<b>Crops</b>	<b>Trees</b>				
<b>23328 m<sup>2</sup></b>	<b>8748 m<sup>2</sup></b>	<b>4,038,921 (EGP)</b> (Corn, Tomato, Rice, Watermelon)	<b>943,250 (EGP)</b> 1258 Palm Trees	<b>1568m<sup>2</sup></b>		<b>495</b>	

#### IV. Socio-Economic Survey

The census survey covered the project affected people who will lose their crops, and trees due to the installation of the towers and the lines.

The number of owners and tenants along the two OHTLs is 126 persons. The magnitude of impact can be measured by considering the impact on the livelihood of the whole family. The social survey was conducted on all PAPs and their families.

#### V. Legislative and Regulatory Frameworks

This section aims at summarizing the social legislations, regulations, guidelines (that govern the implementation of the project. This will include reference to Egyptian enabling legislation and major regulations, as well as to EIB standards, Involuntary Resettlement.

The Egyptian Legal procedures related to Involuntary Resettlement are:

- Law 1/2015 On the amendment of some provisions of Law No. 10 of 1990 on the land acquisition
- Law 10/1990 On Property Expropriation for Public Benefit identifies
- Law 577 of year 1954 and Law 27 of year 1956 for land acquisition
- Law 27 of year 1956
- The new Egyptian Constitution
- Civil code 131 of year 1948
- Electricity Law 63 of year 1974
- Electricity Law 67 of Year 2006

- Electricity Law No. 87 of Year 2015
- The EIB Environmental and Social Handbook (2013),
  - Standard 6: Involuntary Resettlement
  - Standard 7: Rights and Interests of Vulnerable Groups

## **VI. Gaps between Egyptian Legislations and the EIB standards**



**Comparison of Egyptian regulations with the EIB requirements and measures for bridging the gaps**

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
<b>Property Valuation/compensation</b>	The unit rates used for compensating property and assets are based on the concept of full market price. This is not consistent with the full replacement cost adopted by the lender.	<p>For the EIB, those people whose livelihoods are negatively affected by a project should have their livelihoods improved or at minimum restored and/or adequately compensated for any losses incurred. As such, where physical or economic displacement is unavoidable, the Bank requires the promoter to develop an acceptable Resettlement Action Plan. The plan should incorporate and follow the right to due process, and to meaningful and culturally appropriate consultation and participation, including that of host communities.</p> <p>In cases of loss of land for households with land-based livelihoods, affected people must first be offered alternative land of better or equal quality.</p> <p>In cases of loss of housing, compensation for houses and other structures should be equivalent to replacement cost plus relocation costs. Depreciation of assets or the value of salvage materials shall not be deducted from the value of replacement cost.</p> <p>Where the option of cash compensation or alternative accommodation is provided, the cost estimates for providing alternative accommodation could be used</p>	<p>The EETC is required to calculate the compensation value throughout the life of the project (digging, construction, and operation); with full replacement cost, in accordance to the market value at the time of compensation.</p> <p>In case of providing cash compensation, EETC has to ensure that the value of the crops and trees is equivalent to the market price. This is in order to be consistent with the "full replacement cost requirement. "Replacement cost" refers to the value determined to be fair compensation for: (i) land, based on its productive potential; (ii) houses and structures, based on the current market price of building materials, and labor without depreciation or deductions for salvaged building material, and (iii) residential land, crops, trees, and other commodities, based on their market value. Such cost needs to be further accounted for in case of any removal costs, utility connection costs, taxation costs imposed on new housing/re-established businesses etc. Where markets do not exist, surrogate values must be determined (see EIB Handbook 2013 standard 6, p. 54).</p>

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
		for calculating cash compensation payable. For movable structures, such as kiosks or stalls, comparable replacement sites should be offered. A good practice is to calculate replacement cost for such structures as the cost of alternative sites, the cost of replacing improvements (such as foundations), and relocation expenses or other transaction costs.	
<b>The cut-off date</b>	There is no cut-off date under the Egyptian laws.	The WB identifies a cut-off date in order to prevent people influx to the project area. This measure is stipulated in order to protect the project owner and to prevent wasting of resources. The Egyptian laws never set a cut-off date. The cut-off date is the day the census starts.	The cut-off date will be differing according to the project and the OHTL. It will be determined separately for each OHTL. The cut-off date will be the day when the census starts for the preparation of the site-specific RAPs or ARAPs
<b>Temporary loss of structure (For title and non-title holders)</b>	In compensating temporarily occupied structure, Egyptian law requires determination of the price per room or area to arrive at the market value. The law also provides tenants with an option to acquire alternative shelter but requires them to pay the difference, if any, in price.	The Bank's policy in involuntary resettlement requires: (i) compensation to restore the structure to its original condition, (ii) inconvenience allowance if the temporary land acquisition produces minor difficulties and, (iii) alternative comparable accommodations, rental allowance for equivalent temporary housing, or payment for constructing temporary housing of a reasonable equivalent standard can be provided. If structures themselves are temporarily acquired, or use of the structure is precluded, compensation for moving and	Dialogue with Egyptian authority on the Bank's policy in involuntary resettlement with focus on compensation for: (i) temporary land acquisition with minor inconvenience; (ii) structures that are temporarily acquired; (iii) precluding use of the structure and (iii) moving and restoration expenses.  EETC is committed to compensating all PAPs whether they are title or non-title holders so to restore their livelihoods in accordance to the Bank's requirements EIB.

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
		restoration expenses are covered.	
<b>Compensation eligibility</b>	Under Egyptian law, the only people and entities entitled for compensation are those with registered property rights, for example, registered landowners, occupants, users and those with registered third party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration. This potentially disqualifies many categories of affected people that would be entitled to compensation under EIB and the OP 4.12.	<ul style="list-style-type: none"> <li>Eligibility Criteria for compensation under EIB/IFC/ OP 4.12:               <ul style="list-style-type: none"> <li>(a) those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country);</li> <li>(b) those who do not have formal legal rights to land, at the time the census begins, but have a claim to such land or assets; provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan;</li> <li>(c) Those who have no recognizable legal right or claim to the land they are occupying.</li> </ul> </li> <li>To determine eligibility:</li> <li>Carry out resettlement census. Cut-off date for eligibility is the day when the census begins.</li> </ul> <p>Under the EIB/ IFC and OP 4.12 all the land needed for a project is subject to compensation</p>	<p>The categories of people who must be compensated under Egyptian legislation are narrower than those defined under EIB/IFC/ OP 4.12.</p> <p>Under this project all the categories (a,b,c) will be considered for compensation in accordance to EIB/IFC/ OP4.,12.</p> <p>Resettlement assistance should be provided in order to improve the PAPs livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p> <p>Accordingly, individuals under category a and b, should be compensated at full replacement cost and EIB requires payment prior to acquisition.</p> <p>While those who are using land but have no recognizable legal rights or claim (i.e. individuals under category c) will be compensated for their investments on the land in order to improve their livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p>

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
<b>The right of squatters</b>	Not included in the legislation  (Applied cases for resettlements revealed that squatters have been compensated as a result of political sensitivity)	The right of squatters is not addressed in Egyptian law, the Bank's policy requires squatters be provided with compensation for loss of structures/loss of economic activities/livelihoods and resettlement assistance when they are affected by projects financed by the Bank, but no compensation for the land the squatters are occupying. Egyptian legislation has not recognized the rights of squatters. There have been resettlement cases in which the Egyptian government compensated squatters because of political sensitivity to the problem rather than because of provisions in the law or in compliance with the Bank's policy.	Egyptian practices regarding the right of squatters can be employed to deepen discussion leading toward legislative solutions. Bank's discussion with Egyptian authorities may help address and formalize the treatment of squatters in line with the Bank standards.  EETC is committed to compensating all PAPs whether they are title or non-title holders so to restore their livelihoods in accordance to the Bank's requirements EIB.
<b>Livelihood/income restoration and assistance</b>	Egyptian regulations do not specify income restoration allowances where the PAPs incurred losses of business income.	EIB standard 6, p.57 requires that all affected persons will be paid fair compensation in good time for expropriated assets.  Compensation should be provided for any loss of personal, real or other property, goods or assets, including rights or interests in property, for instance, land plots and house structures, contents, infrastructure, mortgage or other debt penalties.  Where land has been taken, affected persons should be compensated with land of commensurate quality, size and value,	EETC is to define livelihood restoration, provide selection criteria for the members of the compensation committee, and describe future engagement of EETC with committee to the satisfaction of the Bank.  Hence, EIB principle regarding income restoration will be considered. Therefore, those whose income is going to be affected will be compensated for the loss of profit and income.

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
		or better.	
<b>Calculation of Compensation</b>	According to prevailing prices in the affected area and assessed by a specialized committee for that purpose	Full replacement cost	EETC should build their estimation on full replacement cost to be adopted to the EIB standards
<b>Vulnerable groups</b>	Egyptian regulations have not addressed how vulnerable groups affected by expropriation of property should be treated	The EIB standard 7 stipulates the importance of paying attention to the minority rights and non-discrimination in the EU. Minority protection and participation are inherent in the EU's founding principles and in the principles of subsidiarity. The evolution of human rights protection has strengthened anti-discrimination legislation particularly with respect to women and to employment. Similar protection remains to be developed for ethno-cultural diversity. Protection of minorities and indigenous peoples is limited to dealings with external partners.	<p>Poor and marginalized people such as single-headed households and those with handicaps also have to be engaged in this project by inviting them to the stakeholder engagement activities and consultations.</p> <p>In the coming stage, EETC needs to conduct a social survey covering the entire transmission line in order to identify all vulnerable groups. Subsequently, the impacts of the project have to be assessed so to inform EETC of the compensation and assistance that will be provided to vulnerable groups.</p> <p>Specifically, site visits have to be paid to the vulnerable groups in order to inform them about the project and its positive and adverse impacts. Additionally, they are to be informed about the grievance mechanism and given the contacts of the compensation committee in order to get the needed information.</p>
<b>Access to timely and</b>	Egyptian law stipulates that PAPs be provided with timely	EIB standard 10 on Stakeholder Engagement P.89 focuses on that "the	EETC launched comprehensive Stakeholder engagement activities that

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
<b>relevant information</b>	and relevant information.	timely disclosure of relevant project information enables stakeholders to understand the project's risks, impacts and opportunities. Mindful of this and as foreseen in the Stakeholder Engagement Plan, the promoter will provide identified stakeholders with relevant information in a timely and appropriate manner. The promoter will further disclose and grant access to relevant information to any other interested party as appropriate.	will continue along the life of the project. Integration of community based organization will be the key to provide satisfactory level of information.  All the consultation activities that EETC will take in the context of this project should be included in RAP study,
<b>Grievances Mechanisms &amp; Redress</b>	<p>Egyptian law allows the creation of "Specialized Committees" to address grievances originating from misunderstandings of project policy, or resulting from conflicts among neighbors. The law allows one month to object to the decision of resettlement, four months to seek redress to the compensation value and three months in case of dispute between several individuals or parties on a single property.</p> <p>Court cases in Egypt are known to require long periods of time before settlements can be reached. With intent to address the lengthy time the Egyptian</p>	The Grievance Mechanism according to EIB standard 6 on Involuntary Resettlement p. 59 is "The promoter shall set up and maintain a grievance mechanism that is independent, free and in line with the requirements set out in Standard 10 and that will allow prompt addressing of specific concerns about compensation and relocation from the affected people and host communities and other directly involved entities. The mechanism should be easily accessible, culturally appropriate, widely publicized, and well integrated in the promoter's project management system. It should enable the promoter to receive and resolve specific grievances related to compensation and relocation by affected persons or members of host communities,	<p>It is essential for the EETC to establish a GRM that is acceptable and accessible to community members. It would serve as the first stop for people who have a grievance and will have several channels for them to complain.<sup>4</sup> All petitions will be listened and responded to and a due procedure of handling and managing grievances will be set. Moreover, their social development officers will gain information about how to document the grievances, and how to transfer them to the interested entity.</p> <p>They should be informed that they can take the case to the court If need arises, aggrieved people would however remain free to open a Court case without having registered their grievance with the GRM.</p>

<sup>4</sup>The GRM is fully discussed in Chapter 10.



Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
	court may require to process and resolve disputes.	and use the grievance log to monitor cases and improve the resettlement process.	The grievance mechanism should be set up and maintain in line with the Standard 10 of the EIB
<b>Consultation</b>	There is no explicit consultation requirement in the Egyptian law. However, people in the affected communities are usually informed about the project.	<ul style="list-style-type: none"> <li>Under EIB/IFC/OP 4.12 the affected communities and individuals should be consulted and contribute to the processes of land acquisition and resettlement.</li> </ul> <p>Consultation with the affected PAP should be documented.</p>	<p>Affected groups should have access to full information about the resettlement process and options for compensation.</p> <p>Participatory planning and decision making should be applied in resettlement options and compensation</p>
<b>Monitoring and Evaluation</b>	The absence of monitoring and evaluation measures in Egyptian laws illustrates differences between the two systems. The lack of legally authorized resources can constrain accountability and governance mechanisms of Bank financed projects. The lack of equivalency between the Bank's and Egyptian policy can negatively impact on the very idea of the consultation, decision making and disclosure principles charted in the Bank's OP 4.12.	<p>According to EIB standard 10 on Stakeholder Engagement P. 92 the engagement with stakeholders during the life of a project is a dynamic and challenging process. Promoters are required to monitor the implementation of the stakeholder engagement plan and the performance of the grievance mechanism and report on both. In accordance to and as an integral component of a project's Environmental and Social Management System, monitoring and reporting procedures must be established early on in the operation by the promoter.</p> <p>In terms of monitoring, the promoter will arrange for all necessary provisions to assure stakeholder engagement during the monitoring phase. Thereby, the promoter will endeavor to involve independent third</p>	<p>It is imperative that EETC moves toward advancing its monitoring and evaluation principles as stated in EIB standard 10.</p> <p>As such, the EETC is to develop an M&amp;E and reporting system for the project that is to the satisfaction of the EIB. This is to ensure that the monitoring and reporting that is to take place is done according to EIB standards.</p> <p>There be monitoring of the resettlement activities during the project implementation as detailed in this RPF.</p>

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps
		<p>parties (e.g. CSOs, NGOs, and national human rights institutions) or to facilitate community-driven monitoring, where practical and acceptable by the communities concerned.</p> <p>In terms of reporting, the promoter will establish regular communication and reporting channels back to the communities and individuals impacted and concerned, whether through non-technical summaries of progress updates, engagement activities, public meetings, targeted issue-based hearings.</p>	

## VII. Valuation and Compensation

### • Eligibility criteria and Matrix

There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to the EIB standards (detailed in table 8.1 Project Entitlement Matrix). The following are the identified groups of project-affected persons (PAPs) for this project who are entitled to mitigation/compensation:

#### 1. Temporary (complete or partial) loss of crops and trees in the construction area<sup>5</sup>:

- Farmers / Individuals who have formal legal ownership rights to land
- Farmers / Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights
- Farmers / Individuals who do not have any recognizable legal right or claim to the land: provide compensation for (complete or partial) loss of standing crops, trees, or plants

It must be noted that EETC pays the compensation to the crop holder regardless of their ownership status.

Although Egyptian legislation has no reference to entitlement to compensation for those who do not have legal rights, EETC pays the compensation to the crop holder regardless of their ownership status.

#### 2. Permanent Loss of standing trees under the towers

The project entitlement matrix (Table 8.1) was developed based on the EIB standards. It is important to note that the compensation value developed by the Agriculture Directorate is based on the full market price prevailing in the governorate. It is possible to plant trees under the towers with extending height not more than 7 m.

When determining the location of the towers, EETC ensures that access to agricultural land is not obstructed. Therefore, the towers are located near the main road to make it easier in transporting construction equipment. The site visit confirmed that the OHTLs routes do not obstruct access to agricultural land.

### • Valuation Procedures of Crops

#### 1. Crop valuation

In order to determine the prices of the crops, the study team relied upon the pricing lists provided by the agricultural directorate for the crops and trees. The price lists are developed by the Agriculture Directorate, which is the affiliate Governorate level branch of the Ministry of Agriculture. Prior to developing such lists, the Agriculture Directorate has discussed with the Agriculture Associations within the jurisdiction of the governorate in order to identify the prevailing market price.

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<sup>5</sup> The area under the lines

**Prices provided by the agricultural directorate in Dakahlia Governorate, 2017**

Type of crop	Price (EGP) Per Kirat (175 m <sup>2</sup> )
Corn	375
Tomato	From 500 to 1050 <sup>6</sup>
Rice	450
Watermelon	415
Type of trees	Price (EGP) Per tree
Palm trees	750

Most of the owners/tenants that were consulted about the values of crops and trees indicated that they are satisfied with the crops compensation value. However, they reported that the best timing to give their land to EETC is by the end of the agricultural season<sup>7</sup> after the harvest of crops. Accordingly, EETC is to consider the timing of harvesting and attempt to initiate construction works after this period as a mitigation measure. The Compensation Committee is to coordinate with:

- Heads of agricultural associations to provide information to the compensation committee about the agricultural seasons in the project area
- Owners and tenants, and disclose information to them in order to put this measure into effect and ensure community participation.

**2. Temporary acquisition of land for storing construction material**

Any land needed for temporary storage of construction material will be compensated at full rent price of uncultivated land determined by the agricultural directorate, and in case the land is cultivated the normal compensation mechanism of crops and tress compensation will be applied. In regards to this project, the implemental company does not need separate lands to store the equipment, as they are stored in either the same lands needed to install the towers and to the wiring process, or in the road reserve after coordination with the local units and the agricultural association.

**VIII. Institutional Arrangements**

The organizational setup responsible for compensation activities and Redress Mechanism (GRM) under this project are:

1. Head of Projects Sector (Head of committee),
2. Director General of Civil Administration,
3. Director General of projects' OHTLs,
4. The Engineer responsible for civil works,

<sup>6</sup>The price of tomato depends on the agricultural season

<sup>7</sup>Agriculture in Egypt is divided into four agricultural seasons: the winter season, the summer season and the Nile season, and the insides between them, as well as the permanent or annual crops whose production season extends to a full year or several years, such as sugar cane, fruit crops. The types of agricultural crops vary in each season according to the regions (Upper Egypt and Lower Egypt "Nile Delta") and agricultural courses in each Governorate (*Source: Central Administration of Agricultural Extension and Environment* <http://www.caaes.org>)

5. The Engineer responsible for projects' OHTLs,
6. The Financial member,
7. The Legal member, and
8. The compensation Coordinators for Delta Region (they are responsible for coordination between the agricultural associations and the PAPs).

The PAPs can communicate directly with the coordinators and the project manager as the communication with the PAPs is within their responsibilities.

#### • **Implementation Timetable**

The compensation process is governed by a clear detailed legal framework that enabled compensation committee to perform their work appropriately. In addition, the legal frame is in compliance with the standards of EIB.

Temporary land acquisition and compensation will be completed in coordination with relevant organizations and as per the principles of the prepared RAP. The specific process is as follows:

- Prior to the RAP preparation, the project design department in EETC provides a detailed map on land acquisition scope to identify the land acquisition scope and area.
- Agricultural Directorate provides the prices for the different types of crops.
- Compensation committee initially calculates the needed areas in cooperation with the Agricultural Associations,
- Approval from the EIB on the RAP
- Prior to the implementation of the RAP, verifying the situation on the ground and checking if any changes (compared to the census survey baseline) happen, document the change, assess the implication and inform the Bank
- Delivery of compensation amount to the PAPs.
- Complete legal procedures for land acquisition

#### • **Time Schedule and the Cut-off Date**

The potential date for the start of the OHTLs construction is September 2019 which is considered the cut-off date<sup>8</sup>, and the construction of the substation is already started in July 2018. Construction activities for the OHTLs will start after completing the compensation activities. It is important to note that the project implementation will start with a cut-off date, after approval from the EIB. The public disclosure of the project is done through the stakeholder engagement sessions, and notify the heads of the agricultural associations in the project area; given to their ability to communicate directly with farmers.

During this stage EETC made a preliminary cost estimate for the project affected lands, the determinants of this estimate were:

- land size

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<sup>8</sup> The cut-off date was communicated to PAPs during the consultation activities and field work.

- Type of crop or tree
- The prices mentioned by the Agricultural Directorates

## IX. Budget and Funding Arrangements

### Estimated budget

The compensations are calculated according to:

- **Compensation for crops/Trees:**
  - The prices of the crops and the trees<sup>9</sup> located in the lands where the towers will be constructed.
  - The agricultural seasons during the construction and the operation phases.
  - Tenants and owners are compensated for the season of construction and for the season of operation.
  - The total affected agriculture lands<sup>10</sup> during the construction and the operation phases,
  - The documents of the survey that was conducted by the EETC in coordination with the agricultural directorates and associations,
  - The location of the land from the main roads<sup>11</sup>
- **Compensation for land:**
  - The total area needed for a tower is in average 7 x 7 m, depending on the voltage level of each line to which the towers belong (i.e. for 66kV it is 5 x 5 m, for 220kV it is 7 x 7 m and for 500kV it is 8 x 8 m). EETC will compensate PAPs for the entire area underneath the tower, even though it is acknowledged that some limited economic activity may continue after the completion of the works and that according to Electricity Law No 63 of year 1974 this action is not considered to be or does not entail land acquisition.
  - Compensation for land is calculated according to the area of the tower x Number of towers and the market price of the land
- **Compensation for income losses:**

The loss refers to both the tower area but also below the line (if trees are cut) as well as for access roads required during construction, where crop is destroyed. Loss of income refers both to one-off loss e.g. during construction, but also the on-going loss during operation, due to the restriction on the use of land. EETC will compensate the owner and the tenant.

### Fund Flow and Payment Plan

The EETC go through the following process before processing payments

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<sup>9</sup>The crops and trees prices are presented in table 8.1

<sup>10</sup> The area of affected lands is presented in table 2.1

<sup>11</sup> The lands near to the main road have a high price than the lands away from it, since some of the farmers may build a residential building on their lands and the presence of the towers will prevent them from that, therefore, they need a high compensation value.



- 1- The project manager prepares an estimated budget for the whole project activities, including compensations, this budget is passed on to the Financial Department at EETC in order to make the payment. (After the finalization of bidding procedures)
- 2- The Determination Committee of the EETC approves the budget prior to the construction activities (at least five months)
- 3- The Financial department requests a certain amount of money based on preliminary estimates provided by project engineers. (at least four months before the construction)
- 4- The compensation value will be transferred to the EETC financial department (at least three months before the construction)
- 5- The Compensation Committee begin the census survey and calculate the needed compensations accordingly. They send the inventory lists, supported by the ID of the owner/tenants and his ownership or tenancy status, to the Determination Committee which is responsible for approving the inventory. Thereafter they request the Financial Department to prepare the cheques. (at least one month before the construction)
- 6- The financial department prepares the cheques in advance, at least two weeks before paying the compensation
- 7- The entire amount of compensation should be paid to the owners/tenants prior to the construction.

#### **X. Consultation Activities and Disclosure**

Consultation activities have been carried out in the form of a continuous process that started before the start of preparation of the RAP and the ESIA and have continued during preparation of the RAP study. EETC has applied multi-levels of consultation with the stakeholder and the PAPs during preparation of the RAP. The consultation process is expected to be continued by EETC during various stages. The Compensation Committee is to prepare a plan for consultation activities for the construction and operation phases in order to ensure community participation.

The consultation activities (census survey, scoping, interviews, and focus group discussions) with various stakeholders and community people in the host communities including the affected persons were held for the proposed project area in compliance with relevant EIB and Egyptian legislations. These activities were conducted in relation to the land acquisition and the mitigation of resettlement impacts, in addition to outlining the key aspects that were addressed when holding the consultation activities.

Following are the main objectives of the consultation activities held:

- Collecting information related to the socio-economic profile of the PAPs
- Sharing information about the compensation approach including compensation values and the calculation methods with the PAPs
- Consulting the PAPs about the draft findings of the ESIA and RAP studies
- Meaningful consultation and disclosure which will be based on the disclosure of information relevant project activities, and will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders.

- Inform the general public and other stakeholders about the Grievance mechanism by which they can raise concerns, which the Company will handle in a prompt and consistent manner.

## **XI. Grievance Mechanism**

Grievances and Redress represent one of the important processes that should be tackled carefully during the project implementation. Grievance system is also important for EETC to ensure that complaints are properly handled without delay that may negatively affect the project. Moreover, to ensure that information is shared transparently and that they are accountable to the hosting communities.

The EETC adopted a comprehensive grievance mechanism. Prior to the RAP implementation a grievance leaflet (See Annex VI) was developed by the EETC to be distributed to the PAPs prior to the RAP implementation. Thus, sufficient and appropriate information about the GRM will be shared with the communities prior to the construction phase

EETC Compensation Committee and Social Development Officers (SDOs) in cooperation with the agriculture Association, and the project manager will address all grievances raised by community people, particularly the ones related to resettlement activities.

- **Grievance Tiers**

The proposed mechanism is built on two tiers of grievances

**First tier of Grievances:** Project Manager (on Site) Eng. Gamal Gbre

**Second tier of Grievances:** On the level of EETC headquarter (Mediation Committee)

- **Grievance Channels**

The grievance channels are:

1. Project Manager (on Site) acts as the main channel for receiving complaints. He is available on the location. Most of the complaints raised to him/her are raised verbal. He should document all received grievances in written form, giving each grievance a serial number.
2. Hotline: 121 is the hotline in EETC
3. SMS number 91121
4. EETC Website for literate persons who have access to the internet
5. EETC Compensation Committee and Mediation Committee

- **Response to grievances**

Response to grievance will be through the following channels

- The same channel the complaint was submitted.
- Response to grievances should be handled in timely manner (according the duration indicated for each tier), thereby conveying a genuine interest in and understanding of the worries put forward by the community.
- EETC should keep a record of complaints and results.

- **Monitoring of grievances**

All grievance activities should be monitored in order to verify the process. The following indicators should guide the monitoring process:

- Number of received grievances per month (Channel, gender, age, basic economic status of the complainants should be included)
- Type of grievance received (according to the topic of the complaint)
- Number of grievances solved
- Level of satisfaction with grievance resolutions
- Documentation efficiency

## **XII. Monitoring Arrangements**

This part describes arrangements for monitoring implementation.

**Monitoring aims at tracking project implementation procedures.** It will address the following aspects:

- Follow up on the activities assigned under the RAP (valuation, awareness raising events, disclosure, dissemination activities)
- Follow-up on the status of the PAPs
- Follow up on the process of grievances in order to identify the efficiency of livelihood restoration: agriculture, business
- Provision of all data needed to apply the mid-term evaluation and final assessment

**The evaluation should ensure that policies have been complied with in addition to providing the needed feedback for adjusting strategic directions.**

## الملخص التنفيذي باللغة العربية

### ١. وصف المشروع

استهدفت خطة التوسع المصرية تقوية شبكة الكهرباء القومية بإضافة المزيد من السعات وخطوط الضغط العالي والكابلات الأرضية بحلول عام ٢٠١٨ وذلك من أجل تلبية الزيادة المطردة في الطلب على الكهرباء، وهذا التوسع ضروري لتفريغ الكهرباء المولدة من محطات توليد الكهرباء الجديدة إلى مراكز التحميل.

واستجابة للطلب المتزايد على الكهرباء ودعم خطة الشركة القابضة لكهرباء مصر لتوسيع البنية التحتية للكهرباء الحالية لمحطات توليد الكهرباء ومحطات المحولات الكهربائية والخطوط / الكابلات المترابطة يقوم بنك الاستثمار الأوروبي (EIB) بتمويل بناء عدة محطات فرعية بالتعاون مع الشركة المصرية لنقل الكهرباء.

وبالتوافق مع المعايير البيئية والاجتماعية لبنك الاستثمار الأوروبي تلتزم الشركة المصرية لنقل الكهرباء بإجراء تقييم للأثر البيئي والاجتماعي لمحطة محولات جمصة الجديدة بنظام العزل الغازي (GIS) وخطوطها الهوائية لنقل الكهرباء المتصلة مع مختلف محطات المحولات الحالية وخطة عمل إعادة التوطين في حالة أدت أنشطة المشروع هذه إلى ذلك، وتطبيق التشريعات المصرية و / أو أدوات بنك الاستثمار الأوروبي ذات الصلة لإعادة التوطين.

وسيقوم مشروع إنشاء محطة محولات جمصة الجديدة وخط الضغط العالي الخاص بها بتفريغ ونقل الكهرباء إلى محطة كهرباء غرب دمياط الجديدة وتوفير نظام مستقر لخدمة الكهرباء في منطقة دلتا من خلال تحسين مستوى الجهد وتخفيف تحميل محطات المحولات المجاورة في منطقة الدلتا.

سيتم ربط محطة جمصة الجديدة بشبكة الكهرباء القومية كجزء من المشروع الحالي وذلك من خلال خط نقل علوي جهد ٢٢٠ فولت و ١١/٦٦ ك ف إضافة إلى تحسين شبكة ٢٢٠ ك ف من خلال انشاء شبكة جديدة ٢٢٠ ك ف وتعديل وتوسيع الشبكات الحالية.

وتشمل المكونات الرئيسية للمشروع وفقاً للمواصفات الفنية الخاصة بالشركة المصرية لنقل الكهرباء في ٢٠١٤/٠٩/١٤ الآتي:

**محطة محولات جمصة الجديدة بنظام GIS (١١/٦٦/٢٢٠ ك ف) (١٢٥×٢ + ٤٠×٢ ميجا فولت أمبير)، مع النطاق التالي:**

- ١٠ خلايا (bay) من مفاتيح الفصل للمحطة ذات العزل الغازي ٢٢٠ ك ف؛
- ١٥ خلية قدرة ٦٦ ك ف؛
- ٣ مقاطع من خط هوائي ١١ ك ف
- ٢ محول
- ٢ كمبريسور
- توسعات مستقبلية من خلال خط نقل ثالث ٦٦/٢٢٠ ك ف & ١٢٥ ميجا فولت أمبير وخط نقل ثالث ١١/٦٦ ك ف & ٤٠ ميجا فولت أمبير.

انشاء شبكة خطوط نقل علوية جهد ٢٢٠ ك ف بالنطاق التالي:

- ٢٢٠ ك ف، انشاء محطة توليد كهرباء جمصة / غرب دمياط بخطوط هوائية ذات قواطع مزدوجة مع حوالي ١٠,٥ كيلومتر (دخول/خرج)
- ٢٢٠ ك ف، انشاء محطة توليد كهرباء جمصة / مصنع طيبة للحديد بخطوط هوائية ذات قواطع مزدوجة مع حوالي ٣,٥ كيلومتر (دخول/خرج)

## II. أهداف وغرض خطة عمل إعادة التوطين (RAP)

من الحقائق المقبولة على نطاق واسع، إذا تركت آثار المشروع دون تخفيف، فإن إعادة التوطين الجبري في إطار مشاريع التنمية قد تؤدي إلى مخاطر اقتصادية واجتماعية وبيئية. الغرض من خطة إعادة التوطين هو معالجة أي حالات إعادة توطين جبري قد تنشأ وكذلك توضيح الترتيبات التنظيمية التي قد تكون ضرورية خلال مراحل مختلفة من مراحل إعداد المشروع وتنفيذه.

ويشمل ذلك تعويض جميع الأشخاص المتضررين من المشروع (PAPs) عن فقدان الأراضي والممتلكات وسبل المعيشة الناتجة عن إعادة التوطين. ويمكن إطلاق الخطة عندما يتطلب أي من أنشطة المشروع الحصول على الأراضي و / أو تهجير الأشخاص مما يتسبب في فقدان الأرض أو الممتلكات أو الأصول أو الدخل (للأراضي أو الممتلكات أو الأصول) أو الدخل أو مصادر كسب الرزق.

وقد تم إعداد خطة عمل إعادة التوطين عن طريق إجراء عدة أنشطة استشارية مع الهيئات الحكومية المعنية والأشخاص المتضررين من المشروع والمجتمعات المجاورة والشركة المصرية لنقل الكهرباء، ويستند إعداد الخطة أيضاً إلى خبرة الشركة المصرية لنقل الكهرباء في مشاريع أخرى مماثلة. كما تضمنت المناقشة مع الجهات المعنية معلومات حول القوانين المصرية ووجهات النظر حول طرق التطبيق وتوقيت التنفيذ.

## III. آثار إعادة التوطين

وفقاً للزيارات الميدانية التي أجريت على طول الخطوط الهوائية لنقل الكهرباء المذكورة أعلاه، فإن تأثيرات المشروع ستقتصر على المحاصيل والأشجار خاصة أنه لا توجد مبانٍ صناعية أو سكنية أو تجارية تقع على طول مسار الخطين. والتعويض عن فقدان المحاصيل والأشجار يشمل فقدان الدخل حيث أن مصدر الدخل هو الزراعة.

ستشمل مراحل الإنشاء والتشغيل الآثار المحتملة على الأراضي الزراعية خلال العمليات التالية:

- الحفر وعملية تمديد الأسلاك
- الوصول إلى الطرق الخاصة بمناطق التخزين ومنطقة الأساس
- صيانة الأبراج والخطوط

وستؤدي الأعمال المدنية بما في ذلك مراحل الإنشاء والتشغيل إلى بعض الآثار السلبية التالية:

- فقدان مؤقت للأراضي

- فيما يتعلق بالخسارة المؤقتة للأراضي الزراعية؛ المحاصيل والأشجار الواقعة في الأراضي الزراعية حيث سيتم تركيب الأبراج والخطوط الهوائية في بعض المواسم الزراعية خلال مراحل الإنشاء والتشغيل.

جدول: ملخص آثار المشروع على حياة الأراضي المؤقتة

عدد المتضررين من المشروع			عدد أصحاب المحاصيل	الملكية	الاستخدام	المساحة المتأثرة (م <sup>٢</sup> )	الأثر
عدد أفراد الأسرة	المستأجرون	المالكون					
محطة توليد كهرباء جمصة / غرب دمياط بخطوط هوائية ٢٢٠ ك ف							
٤٥٢	٤٢	٧٣	١١٥	خاصة (ملكية أفراد) <sup>١٢</sup>	زراعي	٢١٦٠٣٨م <sup>٢</sup>	المناطق المزروعة
لا يوجد	لا يوجد	لا يوجد	لا يوجد	مملوكة الدولة	غير مزروعة	٢٧٢٩٠م <sup>٢</sup>	المناطق غير المزروعة
محطة توليد كهرباء جمصة / مصنع طيبة للحديد بخطوط هوائية ٢٢٠ ك ف							
٤٣	٧	٤	١١	خاصة (ملكية أفراد)	زراعي	٢٧٢٩٠م <sup>٢</sup>	المناطق المزروعة
لا يوجد	لا يوجد	لا يوجد	لا يوجد	مملوكة الدولة	غير مزروعة	٢١٤٥٨م <sup>٢</sup>	المناطق غير المزروعة
الأثر الكلي							
عدد المتضررين من المشروع (يشمل عدد أفراد الأسرة)	إجمالي الأراضي المتأثرة دوماً	تعويض المحاصيل / الأشجار		إجمالي المساحة المتأثرة		غير مزروعة	مزروعة
		أشجار	محاصيل				
٤٩٥	٢١٥٨٦م <sup>٢</sup>	٩٤٣٢٥٠ جنيه مصري ١٢٥٨ نخلة	٤٠٣٨٩٢١ جنيه مصري (ذرة - طماطم - أرز - بطيخ)			٢٨٧٤٨م <sup>٢</sup>	٢٢٣٣٢٨م <sup>٢</sup>

#### IV. المسح الاجتماعي والاقتصادي

غطت الدراسة الاستقصائية للمشروع الأشخاص المتضررين الذين سيفقدون المحاصيل والأشجار بسبب تركيب الأبراج والخطوط.

<sup>٢</sup> باستثناء الأرض التي يتم فيها إنشاء البرج رقم ٢٥ فإنها أرض مملوكة للدولة "يرجى الاطلاع على الفصل ١، القسم ١،٣ (محطة توليد كهرباء جمصة / غرب دمياط بخطوط هوائية ٢٢٠ ك ف).

وبلغ عدد الأشخاص المتأثرين بالمشروع على طول الخطين الهوائيين ١٢٦ شخصًا. ويمكن قياس حجم التأثير من خلال النظر في التأثير على معيشة الأسرة بأكملها. وقد تم إجراء المسح الاجتماعي على جميع المتضررين وأسرهم.

#### V. الأطر التشريعية والتنظيمية

يهدف هذا القسم إلى تلخيص التشريعات واللوائح والإرشادات الاجتماعية التي تحكم تنفيذ المشروع. وسيضمن ذلك الإشارة إلى التشريعات التمكينية المصرية واللوائح الرئيسية ومعايير بنك الاستثمار الأوروبي وإعادة التوطين القسري. وتتمثل الإجراءات القانونية المصرية المتعلقة بإعادة التوطين في:

- القانون ٢٠١٥/١ بشأن تعديل بعض أحكام القانون رقم ١٠ لعام ١٩٩٠ بشأن حيازة الأرض
- القانون رقم ١٩٩٠/١٠ بشأن نزع الملكية للمنفعة العامة
- القانون رقم ٥٧٧ لسنة ١٩٥٤ والقانون رقم ٢٧ لسنة ١٩٥٦ بشأن حيازة الأرض
- القانون رقم ٢٧ لسنة ١٩٥٦
- الدستور المصري (تم إلغاؤه بعد ثورة ٢٥ يناير ولكن القضايا الرئيسية المتعلقة بالملكية الخاصة تم تضمينها في إعلان الدستور الجديد (٢٠١١))
- القانون المدني رقم ١٣١ لسنة ١٩٤٨
- قانون الكهرباء رقم ٦٣ لسنة ١٩٧٤
- قانون الكهرباء رقم ٦٧ لسنة ٢٠٠٦
- قانون الكهرباء رقم ٨٧ لعام ٢٠١٥
- الدليل البيئي والاجتماعي لبنك الاستثمار الأوروبي (٢٠١٣)
- المعيار ٦: إعادة التوطين القسري
- المعيار ٧: حقوق ومصالح الفئات المستضعفة

#### VI. تحديد القيمة والتعويض

##### - معايير وجدول الأهلية

هناك فئات مختلفة من المتضررين الذين يحق لهم الحصول على تعويض وإنعاش الجوانب الاجتماعية والاقتصادية وفقًا لمعايير بنك الاستثمار الأوروبي. وفيما يلي المجموعات المحددة للأشخاص المتأثرين من هذا المشروع والذين لهم حق التخفيف / التعويض:

##### ١. خسارة مؤقتة (كاملة أو جزئية) للمحاصيل والأشجار في منطقة الانشاءات:

- المزارعون أو الأفراد الذين لديهم حقوق ملكية قانونية رسمية في الأرض
- المزارعون أو الأفراد الذين ليس لهم حقوق ملكية قانونية رسمية في الأرض ولكنهم يتمتعون بحقوق مؤقتة أو تأجير



- المزارعون أو الأفراد الذين ليس لهم أي حق قانوني أو مطالبة معترف بها للأرض: يتم تقديم تعويض عن خسارة (كاملة أو جزئية) للمحاصيل أو الأشجار أو النباتات القائمة

وتجدر الإشارة إلى أن الشركة المصرية لنقل الكهرباء تدفع التعويض لأصحاب المحاصيل بغض النظر عن وضعهم.

وعلى الرغم من أن القانون المصري لم يشر إلى استحقاق التعويض للأشخاص الذين ليس لديهم حقوق قانونية، فإن الشركة المصرية لنقل الكهرباء تدفع التعويض لمالك المحصول بغض النظر عن وضعه.

## ٢. فقدان دائم للأشجار القائمة تحت الأبراج

تم إعداد جدول استحقاق المشروع بناءً على معايير بنك الاستثمار الأوروبي. ومن المهم ملاحظة أن قيمة التعويضات التي وضعتها مديرية الزراعة تقوم على سعر السوق الكامل السائد في المحافظة.

### - إجراءات تحديد قيمة المحاصيل

#### ١. تحديد قيمة المحاصيل

ولتحديد أسعار المحاصيل، اعتمد فريق الدراسة على قوائم الأسعار المقدمة من المديرية الزراعية للمحاصيل والأشجار. وقامت مديرية الزراعة بإعداد قوائم الأسعار وهي فرع تابع لوزارة الزراعة على مستوى المحافظة. وقبل إعداد هذه القوائم ناقشت مديرية الزراعة مع الجمعيات الزراعية ضمن اختصاص المحافظة من أجل تحديد سعر السوق الحالي.

جدول: الأسعار المقدمة من مديرية الزراعة بمحافظة الدقهلية، ٢٠١٧

نوع المحصول	السعر بالجنيه المصري للقيراط (١٧٥ م <sup>٢</sup> )
ذرة	٣٧٥
طماطم <sup>١٣</sup>	من ٥٠٠ حتى ١٢١٠٥٠
أرز	٤٥٠
بطيخ	٤١٥
أنواع الأشجار	السعر بالجنيه للشجرة
نخيل	٧٥٠

وأشار معظم المالكين / المستأجرين الذين تم استشارتهم بشأن قيم المحاصيل والأشجار إلى أنهم راضون عن قيمة تعويض المحاصيل. ومع ذلك، فقد أفادوا بأن أفضل توقيت لإعطاء أراضيهم هو في نهاية الموسم الزراعي بعد حصاد المحاصيل.

## ٢. حيازة مؤقتة للأراضي لتخزين مواد الإنشاءات

<sup>١٣</sup> سعر الطماطم يعتمد على الموسم الزراعي

سيتم التعويض عن أي مساحة مطلوبة للتخزين المؤقت لمواد الانشاء بسعر الإيجار الكامل للأراضي غير المزروعة التي تحددها مديرية الزراعة. وفي حالة زراعة الأرض سيتم تطبيق آلية التعويض العادية للمحاصيل والأشجار. وفيما يتعلق بهذا المشروع، لا تحتاج الشركة المنفذة إلى أراضي منفصلة لتخزين المعدات لأنها مخزنة في نفس الأراضي اللازمة لتركيب الأبراج وتمديد الأسلاك أو في الأراضي المخصصة لإنشاء الطرق بعد التنسيق مع الوحدات المحلية والجمعية الزراعية.

## VII. الترتيبات المؤسسية

يتكون الهيكل التنظيمي المسؤول عن أنشطة التعويض وآلية التظلم والجبر (GRM) في إطار هذا المشروع من:

١. رئيس قطاع المشروعات (رئيس اللجنة)
  ٢. مدير عام الإدارة المدنية
  ٣. مدير عام الخطوط الهوائية لنقل الكهرباء (OHTLs)
  ٤. المهندس المسؤول عن الأعمال المدنية
  ٥. المهندس المسؤول عن مشروعات الخطوط الهوائية لنقل الكهرباء (OHTLs)
  ٦. العضو المالي
  ٧. العضو القانوني
  ٨. منسق التعويضات لمنطقة الدلتا (مسؤولون عن التنسيق بين الجمعيات الزراعية والأشخاص المتأثرين)
- ويمكن للأشخاص المتأثرين التواصل المباشر مع المنسقين ومدير المشروع حيث أن التواصل معهم يقع في نطاق اختصاصاتهم.

### - جدول التنفيذ

- تخضع عملية التعويض لإطار قانوني واضح ومفصل يمكن لجنة التعويضات من أداء عملها بشكل مناسب. وإضافة إلى ذلك، يتوافق الإطار القانوني مع معايير بنك الاستثمار الأوروبي.
- وسيتم الانتهاء من حيازة الأراضي المؤقتة وتعويضها بالتنسيق مع الهيئات ذات الصلة ووفقاً لمبادئ خطة عمل إعادة التوطين المعدة. وتتمثل العملية المحددة في الآتي:
- تقدم إدارة تصميم المشروع في الشركة المصرية لنقل الكهرباء خريطة تفصيلية لنطاق حيازة الأراضي لتحديد نطاق ومساحة الأراضي قبل إعداد خطة عمل إعادة التوطين.
  - توفر مديرية الزراعة أسعار الأنواع المختلفة من المحاصيل
  - تقوم لجنة التعويضات في البداية بحساب المناطق المطلوبة بالتعاون مع الجمعيات الزراعية
  - موافقة بنك الاستثمار الأوروبي على خطة عمل إعادة التوطين
  - التحقق من الوضع على الأرض والتأكد من حدوث أي تغييرات (مقارنة بخط الأساس لمسح التعداد السكاني) وتوثيق التغيير وتقييم الآثار وإبلاغ البنك وذلك قبل إعداد خطة عمل إعادة التوطين.

- تسليم مبالغ التعويض إلى المتضررين.
- إنهاء الإجراءات القانونية الخاصة بحيازة الأراضي

#### - جدول التنفيذ والموعد النهائي

يتوقع البدء في أعمال الانشاء في سبتمبر ٢٠١٩ والذي يعتبر التاريخ النهائي<sup>١٤</sup>. وستبدأ أعمال الانشاءات بعد الانتهاء من أنشطة التعويض. ومن المهم ملاحظة أن الجدول الزمني للمشروع سوف يبدأ بتاريخ نهائي بعد موافقة بنك الاستثمار الأوروبي. وخلال هذه المرحلة قامت الشركة المصرية لنقل الكهرباء بتقدير أولي للتكاليف لأراضي المشروع المتضررة، وكانت محددات هذا التقدير كالاتي:

- مساحة الأرض
- نوع المحاصيل أو الأشجار
- الأسعار المذكورة من قبل المديريات الزراعية

#### VIII. الميزانية والترتيبات التمويلية

##### - الميزانية التقديرية

يتم احتساب التعويضات على النحو التالي:

##### • تعويضات عن المحاصيل والأشجار

- أسعار المحاصيل والأشجار<sup>١٥</sup> الموجودة في الأراضي التي سيتم انشاء الأبراج فيها
- المواسم الزراعية خلال مراحل الانشاء والتشغيل
- إجمالي الأراضي الزراعية<sup>١٦</sup> المتضررة خلال مراحل الانشاء والتشغيل
- وثائق الاستبيان التي أجرتها الشركة المصرية لنقل الكهرباء بالتنسيق مع المديريات والجمعيات الزراعية
- موقع الأرض من الطرق الرئيسية<sup>١٧</sup>

##### • تعويضات عن الأراضي

- ستكون قوائم الأبراج حيازة دائمة للأرض. ومع ذلك، فإن قانون الكهرباء رقم ٦٣ لسنة ١٩٧٤ لا يعتبر منطقة القوائم حيازة للأراضي. وتبلغ المساحة الكلية لقوائم البرج حوالي ٢٠ × ٢٠ سم لكل قائمة. وبناءً على نقاش مع الشركة المصرية لنقل الكهرباء فقد أفادوا أنه على الرغم من أن مثل هذه الأراضي الموجود بها قوائم الأبراج فلا يحق

<sup>١٤</sup> تم ابلاغ الأشخاص المتضررين بالموعد النهائي خلال أنشطة الاستشارات والعمل الميداني

<sup>١٥</sup> أسعار المحاصيل والأشجار موضحة في الجدول رقم ٨، ١

<sup>١٦</sup> مساحة الأراضي المتأثرة موضحة في الجدول ٢، ١

<sup>١٧</sup> ثمن الأراضي القريبة من الطرق الرئيسية أعلى من البعيدة عنها حيث قد يقوم بعض المزارعين ببناء مبنى سكني على أراضيهم ووجود الأبراج سيمنعهم من ذلك ولذلك يحتاجون إلى تعويض مرتفع القيمة.

لأصحابها الحصول على تعويض وفقاً لقانون الكهرباء إلا أنه سيتم الأخذ في الاعتبار حصولهم على تعويض كجزء من تعويض البرج.

- يتم احتساب التعويض عن الأرض حسب مساحة البرج  $\times$  عدد الأبراج والسعر السوقي للأرض

#### • التعويض عن خسائر الدخل

يرتبط فقدان الدخل بفقدان المحاصيل الزراعية خلال موسم الزراعة؛ لذلك، يتم تعويض المحاصيل والأشجار الزراعية عن فقدان الدخل لأن الدخل مرتبط بالدخل من بيع المحاصيل الزراعية، يشير إلى كل من منطقة البرج ولكن أيضاً تحت الخط (إذا تم قطع الأشجار) وكذلك طرق الوصول المطلوبة أثناء البناء، حيث يتم تدمير المحاصيل. يشير فقدان الدخل إلى خسارة لمرة واحدة على سبيل المثال أثناء البناء، ولكن أيضاً الخسارة المستمرة أثناء التشغيل، بسبب القيود المفروضة على استخدام الأراضي. ستقوم EETC بتعويض المالك والمستأجر.

#### - التدفقات المالية وخطة السداد

تمر الشركة المصرية لنقل الكهرباء بالمراحل التالية قبل انهاء اجراءات الدفع:

١. يقوم مدير المشروع بإعداد ميزانية تقديرية لأعمال المشروع بأكملها بما في ذلك التعويضات، ويتم تمرير هذه الميزانية إلى الإدارة المالية في الشركة لإجراء عملية الدفع. (بعد الانتهاء من إجراءات تقديم العطاءات)
٢. تعتمد لجنة التحديد التابعة للشركة الميزانية قبل أعمال الانشاءات بخمسة أشهر على الأقل
٣. تطلب الإدارة المالية مبلغاً معيناً من المال بناءً على التقديرات الأولية المقدمة من مهندسي المشروع. (ما لا يقل عن أربعة أشهر قبل الانشاء)
٤. يتم تحويل قيمة التعويض إلى الإدارة المالية للشركة (قبل ثلاثة أشهر على الأقل من الإنشاء)
٥. تبدأ لجنة التعويضات بإجراء الدراسات الاستقصائية المتعلقة بتعداد السكان وتحسب التعويضات المطلوبة وفقاً لذلك، ومن ثم ترسل قوائم الحصر المدعومة ببطاقة تعريف المالك / المستأجر وملكيته أو وضعه في الإيجار إلى لجنة التحديد المسؤولة عن الموافقة على الحصر. وتطلب بعد ذلك من الإدارة المالية إعداد الشيكات (على الأقل قبل شهر واحد من الإنشاء)
٦. تقوم الإدارة المالية بإعداد الشيكات مقدماً قبل أسبوعين على الأقل من دفع التعويض
٧. ينبغي دفع القسط الأول للمالكين / المستأجرين قبل الإنشاء
٨. يتم إعداد الأقساط المتبقية على طول المدة الزمنية للإنشاءات

#### IX. أنشطة الاستشارة والكشف عن المعلومات

تم تنفيذ أنشطة التشاور في شكل عملية مستمرة بدأت قبل بدء إعداد خطة عمل إعادة التوطين وتقييم الأثر البيئي والاجتماعي واستمرت الأنشطة خلال إعداد الدراسة الخاصة بخطة عمل إعادة التوطين. وقد طبقت الشركة المصرية لنقل الكهرباء

مستويات متعددة من التشاور مع الجهات المعنية والأشخاص ذوي الأوضاع الهشة خلال إعداد خطة عمل إعادة التوطين. ومن المتوقع أن تستمر الشركة في عملية التشاور خلال مراحل متنوعة.

وتم عقد أنشطة التشاور (الدراسات الاستقصائية المتعلقة بتعداد السكان وتحديد النطاق والمقابلات ومناقشات جماعية مركزة) مع مختلف الجهات المعنية وأفراد المجتمع في المجتمعات المضيفة بما في ذلك الأشخاص المتأثرين في منطقة المشروع المقترحة بما يتفق مع القوانين المصرية ولوائح بنك الاستثمار الأوروبي ذات الصلة. وقد تمحورت هذه الأنشطة حول حياة الأراضي والتخفيف من آثار إعادة التوطين بالإضافة إلى تحديد الجوانب الرئيسية التي تم تناولها عند عقد أنشطة التشاور. وفيما يلي الأهداف الرئيسية لأنشطة الاستشارات التي يتم عقدها:

- جمع المعلومات ذات الصلة بالوضع الاجتماعي والاقتصادي للأشخاص المتضررين
- تبادل المعلومات حول منهجية التعويض بما في ذلك قيم التعويض وطرق الحساب مع الأشخاص المتضررين
- استشارة الأشخاص المتأثرين بالمشروع بشأن مشروع نتائج دراسات خطة عمل إعادة التوطين وتقييم الأثر البيئي والاجتماعي
- إجراء مشاورات والكشف عن معلومات ذات مغزى تستند إلى الكشف عن معلومات متعلقة بأنشطة المشروع، وسيتم تنفيذه بطريقة شاملة وملائمة ثقافياً لجميع الجهات المعنية.
- آلية التظلم التي يمكن للجمهور العام والجهات المعنية الأخرى إثارة المخاوف من خلالها والتي ستتعامل معها الشركة بطريقة سريعة ومتسقة.

## X. آلية التظلم

يمثل التظلم والجبر أحد العمليات الهامة التي ينبغي معالجتها بعناية أثناء تنفيذ المشروع. كما أن نظام التظلمات مهم أيضاً للشركة المصرية لنقل الكهرباء لضمان التعامل مع الشكاوى بشكل سليم دون تأخير والتي قد تؤثر سلباً على المشروع وكذلك لضمان تقاسم المعلومات بشفافية وأن تكون مسؤولة أمام المجتمعات المضيفة.

اعتمدت الشركة المصرية لنقل الكهرباء آلية تظلم شاملة. وقد تم إعداد نشرة التظلمات من قبل الشركة لتوزيعها على الأشخاص المتأثرين بالمشروع قبل تنفيذ خطة عمل إعادة التوطين. وبالتالي، سيتم مشاركة المعلومات الكافية والمناسبة حول آليات التظلم والجبر مع المجتمعات قبل مرحلة الانشاء.

### - مستويات التظلم

تم بناء الآلية المقترحة على مستويين من التظلم

**المستوى الأول من التظلم:** مدير المشروع (بالموقع) م/ جمال جبر

**المستوى الثاني من التظلم:** على مستوى المقر الرئيسي الشركة المصرية لنقل الكهرباء (لجنة الوساطة)

### - قنوات التظلمات

تتمثل قنوات التظلم في:

٦. مدير المشروع (في الموقع) بمثابة القناة الرئيسية لتلقي الشكاوى وهو متواجد في الموقع. ويتم رفع معظم الشكاوى المرفوعة له / لها شفهيًا. وينبغي عليه توثيق جميع الشكاوى الواردة في شكل مكتوب مع إعطاء كل تظلم رقم مسلسل.
٧. الخط الساخن: ١٢١ وهو الخط الساخن للشركة
٨. رسالة نصية لرقم ٩١١٢١
٩. موقع الشركة للأشخاص الذين يعرفون القراءة والكتابة والذين لديهم إمكانية الوصول إلى الإنترنت
١٠. لجنة التعويض ولجنة الوساطة بالشركة

#### - الرد على التظلمات

يكون الرد على التظلم من خلال القنوات التالية:

- نفس القناة التي قدمت الشكاوى.
- ينبغي الرد على التظلمات في حينها (وفقا للمدة المشار إليها لكل مستوى)، وبالتالي نقل الاهتمام الحقيقي وفهم المخاوف التي يطرحها المجتمع.
- ينبغي أن تحتفظ الشركة بسجل الشكاوى والنتائج.

#### - مراقبة التظلمات

ينبغي مراقبة جميع أنشطة التظلم من أجل التحقق من العملية. كما ينبغي أن توجه المؤشرات التالية عملية المراقبة:

- عدد الشكاوى الواردة في الشهر (القناة - الجنس - العمر - الحالة الاقتصادية الأساسية لأصحاب الشكاوى)
- نوع التظلم الذي تم تلقيه (وفقاً لموضوع الشكاوى)
- عدد الشكاوى التي تم حلها
- مستوى الرضا عن قرارات التظلمات
- كفاءة التوثيق

#### XI. ترتيبات المراقبة

يصف هذا الجزء ترتيبات مراقبة التنفيذ لأغراض كل من المشروع الداخلي والمراقبة الخارجية التي ستجري بواسطة جهة مؤهلة مستقلة عن مكتب المشروع.

وتهدف المراقبة إلى تتبع إجراءات تنفيذ المشروع، وستتناول الجوانب التالية:

- متابعة الأنشطة المسندة في إطار خطة عمل إعادة التوطين (تحديد القيمة وفعاليات التوعية والكشف عن المعلومات وأنشطة النشر)
- متابعة حالة الأشخاص المتضررين من المشروع
- متابعة عملية التظلم من أجل تحديد كفاءة استعادة سبل العيش: الزراعة والأعمال التجارية
- توفير جميع البيانات اللازمة لتطبيق تقييم منتصف المدة والتقييم النهائي

وينبغي أن يضمن التقييم التوافق مع السياسات بالإضافة إلى توفير التغذية المرتدة اللازمة لتعديل الاتجاهات الاستراتيجية.



## 1 CHAPTER ONE: Description of the Project

In order to meet the steady increase in energy demand, the Egyptian expansion plan targeted to reinforce the national electricity network by adding more capacities and overhead transmission lines and underground cables by year 2018, this expansion is required for evacuation of power generated from the new power plants to the load centres.

The EETC is one of sixteen affiliated Companies under the Egyptian Electricity Holding Company (EEHC). The main role of the EEHC is the management, operation and maintenance of electric power transmission grids on extra high voltage and high voltage all over the country, for the optimal economic usage of those grids. EEHC's goal is to meet the growth in electricity demand while optimizing the use of all resources and maximizing the profit.

In response to the growing demand for electricity and in support for EEHC's plan to expand the existing electricity infrastructure of power stations, substations and interconnecting lines/cables, the European Investment Bank (EIB) is funding the construction of several substations in cooperation with the EETC.

In line with EIB environmental and social standards, EETC is committed to carrying out an ESIA of New Gamasa GIS Substation and its interconnecting OHTL to different existing substations and a Resettlement Action Plan (RAP) should the project activities trigger Egyptian legislations and/or EIB instruments relevant to resettlement.

The construction of New Gamasa GIS Substation and its overhead transmission line cable will evacuate and transmit the energy of New West Damietta power plant, provide system stability electricity service at Delta zone area by improving the voltage level, as well relieve the loading of the neighboring substations in Delta Zone.

### 1.1 Key objectives of project

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The construction of New Gamasa GIS Substation 220/66/11 kV (2x125+2x40 MVA,) and its overhead transmission lines interconnection (220 kV and 66 kV networks) will improve power capacity at Delta Zone Area with minimum losses of transferred power. The project aims to fulfil the following five main objectives:

- Evacuate the generated power from New West Damietta Power plant,
- Feeding 80MW to TIBA steel plant near Gamasa city,
- Reliving the loading of the neighboring Substations in Delta zone such as (Mansoura, Gamalia, Damiett
- Improve the voltage level and system stability in Delta Zone area, and
- Reinforce the 220kV and 66 kV national electricity network.

Those objectives are in accordance to the EEHC and its affiliated companies' mission toward the society: to provides continuous and safe supply of electricity to all type of consumers. In addition, as the EEHC and its affiliated companies' long-term goals, all the implementation of their project is in

accordance with international performance standards and taking into consideration all the environmental, social and economic determinants.

As part of the current project, the New Gamasa Substation will be connected to the national electricity network through 220 kV and 66/11 kV overhead transmission line, in addition improving the 220 kV network through construction new 220 kV network, modifying and extending current ones.

The main components of the project according to EETC technical specifications on 14/09/2014 are as following:

New Gamasa GIS Substation SS 220/66/11 kV (2x125+2x40 MVA), with the following scope

- 10 Bays of 220 kV GIS;
- 15 cells of 66 kV GIS ;
- 3 sections of 11 kV;
- 2 Transformers;
- 2 compressors units; and
- Future expansion with 3<sup>rd</sup> transmitter 220/66 kv, 125 MVA and 3<sup>rd</sup> transmitter 66/11 kv, 40MVA.

As part of the current project, the New Gamasa GIS 220 kV Substation will be connected to the national electricity network through the following:

1. Construction of 220 kV overhead transmission line network with the following scope:
  - 220 kV, construction of OHTL double circuit Gamasa \ West Damietta power plant with approximately 10.5 km (IN/OUT)
  - 220 kV, construction of OHTL double circuit Gamasa \ TIBA Steel with approximately 3.5 km (IN/OUT)
2. Construction of 66 kV overhead transmission line network with the following scope:
  - 66 kV, OHTL double circuit AAAC 405 mm<sup>2</sup> Gamasa SS (the old one)/ Balteem and extending its length by approximately 2x 0.15 km (2x150 meters) (IN/OUT). This is the only OHTL of 66kV associated to New Gamasa SS. The line is already in existence and its route passes through state-owned land. The line consists of 2 towers which are constructed on allocated areas of the industrial zone, on which there is no economic activity. Consequently, no RAP study is anticipated for this OHTL.
  - Description of the project activities

This section provides a description of the proposed project activities over the lifecycle of the project: planning, construction and operation. Each of those activities might result certain impacts that should be mitigated.

### 1.1.1 The Transmission Line

In order to construct Overhead Transmission Lines in agricultural lands, some plots of lands will need to be temporarily taken over by the project. These are needed to lay the foundation of towers, storing construction materials and soil results from digging and to install the electricity wires.

#### Preparing the Right of Way

Relevant laws and guidelines require maintaining a suitable Right of Way (RoW) distance in order to maintain safety of the general public and minimize exposure to Electromagnetic Fields (EMFs). Thus, the EMFs would effectively attenuate at the edge of this RoW.

According to the Electricity Law No.63 of year 1974, the RoW will constitute 25 m at each of the two sides of the transmission line which represent, also, the protection zone along the line route. The RoW should be cleared of both tall wooden trees and of buildings ranging higher than four meters.

#### Construction of Towers Foundations

The EETC use various models and types of towers. The total number of the electric towers along Gamasa \ West Damietta line is 32, while the total number of the electric towers along Gamasa \ TIBA Steel is 12.

Digging soil for the construction of the foundation will necessitate removing all crops, trees and construction on the acquired land. All lands allocated to host the foundations of towers are taken over on a temporary basis.

The average area that will be temporary affected from digging and installing the foundations are as follows:

The average area of tower digging is  $27 \text{ m} \times 27 \text{ m} = 729 \text{ m}^2$  per each tower. It is the total area of the land affected as a result of excavation and installation work of the OHTL. The following table shows the total number and area of OHTL

**Table 1-1: The Total number and area of OHTL**

OHTL	No. of OHTL towers located in Cultivated lands	No. of OHTL towers located in Uncultivated lands	Total No. of OHTL towers	Cultivated areas	Uncultivated areas
220 kV OHTL New Gamasa SS \ West Damietta power	22	10	32	16038 m <sup>2</sup>	7290 m <sup>2</sup>
220 kV OHTL New Gamasa SS \ Tiba Steel	10	2	12	7290m <sup>2</sup>	1458 m <sup>2</sup>
<b>Total</b>	32	12	42	<b>23328 m<sup>2</sup></b>	<b>8748 m<sup>2</sup></b>

The contractor takes precautions in order to strengthen the affected soil from potential earth collapse, particularly in the muddy and sandy soil.

### **Box 1: Restoration of lands productivity**

Restoration of lands productivity
The soil which is removed in the process, is carefully separated to preserve the top soil. The subsoil is then backfilled into the hole and compressed to strengthen the foundation and the topsoil is laid on top and reseeded with appropriate vegetation. Those activities are part of the construction process. This process is crucial to put limitations to the project impacts on the agriculture areas as restoring the productivity of soil enhances the income restoration for the farmers.

### **Wiring**

The wire ropes are unfolded on the ground along the anchor span and then raised and strung sequentially on the towers and tensioned.

## **1.2 Avoidance Mechanism**

It is the policy of the EETC to minimize the impacts on the PAPs. Following are the main procedures adopted by all EETC projects

- EETC have planned their projects to pass mainly in uncultivated desert lands. They try to have the towers on lands owned by the state.
- EETC try to avoid damaging trees and constructions as they are of permanent impact. Additionally, the loss of trees takes at least 3-5 years to be restored.
- Access roads to the towers sites are selected from the nearest areas to main roads in order to not damage more crops.
- Allowing farmers to harvest their crops as long as the time plan will not be affected.
- Allowing the farmers to move the trees by themselves in order to be able to benefit from the affected trees. However, compensations are paid to farmers when trees are affected.
- The duration of construction does not exceed one month. The limited construction period enables the farmer to restore income shortly.

### **1.2.1 Substation**

#### **New Gamasa GIS Substation**

The SS is located in Gamasa city, Dahaklia governorate, on the international coastal road in Isis area. The site will be constructed in arid area with no vegetation covers; the proposed substation has a rectangular shape with area of approximately 38,425 m<sup>2</sup> (198.3 m x 195.66m x 197.05m x 193.11m).





Figure 1-1: Map of proposed SS for New Gamasa GIS SS and its surroundings

### 1.3 Description of the Over Head Transmission Lines

#### 1. 220 kV OHTL New Gamasa SS \ West Damietta power

The OHTL originates from new Gamasa SS on state-owned land, then it crosses the international coastal road to pass in cultivated lands then in state-owned lands heading Damietta power plant. The OHTL is of 10.5 km total distance where 32 electric towers are to be established, among which 24 towers are located in Damietta Governorate, while 8 towers are located in Dakahlia Governorate. The 220 kV OHTL pass through two villages; El Rakabih village, and Gamasa El Baled village.

According to the site visits conducted along the route of the OHTL and the interviews with some of the representatives from EETC, the towers number (1), (2), and (3) will be located in state-owned lands, while the towers from (4) to (24) will be located in cultivated lands various between trees (palm trees) and crops (tomatoes, rice, corn, watermelon, etc.). Then the towers from (25) to (32) will be located in state-owned lands, they are parallel to the green belt “based on the coordination between the EETC and Gamasa city authority”. Accordingly, 22 towers will be located in agricultural lands by length 6.94 km of the OHTL route, while 10 towers will be located in state-owned lands by length 3.56 km of the OHTL route.

In regards to tower no. (25), it will be located in state-owned land. However, one of the residents encroached upon the land and planted it. According to the project manager, this resident will be compensated for his loss in crops during both construction and operation phases even though he has no a legal status.



Figure 1-2: The route of 220 kV OHTL from Damietta power plant to New Gamasa SS





Figure 1-3: Gamasa SS



Figure 1-4: Damietta power plant



Figure 1-5: One of the private cultivated lands where the towers will be constructed



Figure 1-6: One of the uncultivated state-owned lands where the tower will be constructed (this land is parallel to the green belt)



## 2. 220 kV OHTL New Gamasa SS \ Tiba Steel

All EETC RAPs did not include the 66kV Lines, this due to that EETC cannot control these lines which are made according to the needs of Distributing Companies and may be they change them more than one time; So, all the RAPs submitted to all IFIs did not include the 66kV line which are normally short lines and did not make problems.

The OHTL originates from new Gamasa SS on a state-owned land, then it crosses the international coastal road, then it will pass in cultivated lands heading TIBA Steel. The OHTL is of 3.5 km total distance where 12 electric towers are to be established. The OHTL pass through Umm El Rida village in Dakahlia Governorate.

According to the site visits conducted along the route of the OHTL and the interviews with some of the representatives from EETC, towers no. (1) And (2) are located in state owned lands, while the towers from (3) to (12) are located in agricultural lands (only crops are cultivated, there are no seasonal trees). 10 towers are located in agricultural lands represents about 2.47 km of the OHTL route, while 2 towers are located in state-owned lands represent 1.03 km of the route.



Figure 1-7: The route of 220 kV OHTL from new Gamasa SS to TIBA Steel



**Figure 1-8: One of the private cultivated lands where the towers will be constructed**



**Figure 1-9: Tiba steel plant**

### **3. 66 kV OHTL New Gamasa**

This is the only OHTL of 66kV associated to New Gamasa SS. It is existed and its route is passing through public property therefore NO RAP study is anticipated for this line. It is connected to the New Gamasa SS 220/66/11 kV through dismantling and renovation to an existing OHTL Kafr el Bateekh/Gamasa 66kv (the old one).

The OHTL Gamasa 66 SS (the old one) / Balteem had been constructed before the arrangement to commence the proposed New Gamasa SS. This line constructed onto 2 towers. The first tower is located 50 meters far from the fence of New Gamasa SS then it crosses the international coastal road between Alexandria and Damietta to reach the second tower. The 2 towers are constructed in



allocated areas of the industrial zone which is state property. Consequently, No RAP study anticipated for this OHTL.



**Figure 1-10: The route of 66 kV OHTL Gamasa SS (the old one)/Balteem**

## 2 CHAPTER TWO: RAP Purpose and Objectives

It is a widely accepted fact, if the impacts of the project left unmitigated, involuntary resettlement under development projects may give rise to economic, social and environmental risks. The purpose of the Resettlement Action Plan (RAP) is to address any cases of involuntary resettlement that may arise, as well as to clarify the organizational arrangements that may be needed during different phases of the project preparation and implementation phases.

This includes compensating all Project Affected Persons (PAPs) for the loss of lands, properties, and livelihoods resulting from resettlement. The RAP may be triggered whenever any of the project's activities entail the acquisition of land and / or the displacement of people, causing the loss of land, property, assets, access (to land, property, and assets), income, or sources of livelihood.

The RAP covers all the project's activities, and shall apply to all Project Affected Persons regardless of the total number affected, the severity of impact, and whether or not the Project Affected Persons have ownership rights. Since resettlement often affects the most vulnerable and marginalized groups (economically, politically, and socially), the action plan shall be particularly sensitive to the affects which resettlement may have on these groups.

### 2.1 Objectives of the RAP

The objectives of this RAP correspond to those of the EIB Guidelines and World Bank's Policy on involuntary Resettlement, namely:

- To avoid or minimize (as much as possible) involuntary resettlement and land acquisition through design efforts.
- If involuntary resettlement and land acquisition is unavoidable, to execute resettlement and compensation activities as sustainable development programs, whereby sufficient investment resources are provided to give the PAPs an opportunity to share in project benefits. Displaced and compensated persons shall be meaningfully consulted and given opportunities to participate in planning and implementing Resettlement Action Plan (RAP).
- To assist PAPs in their efforts to improve their livelihoods and standard of living or at least to restore them to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The main goal of a RAP is (1) to mitigate the negative social impact of project-induced asset loss and/or restrictions of land use through (a) the provision of appropriate compensation and/or livelihood opportunities (regardless of the legality of existing land tenure arrangements), and (b) ensuring that resettlement measures are implemented with meaningful consultation and the informed participation of the affected people; as well as (2) to outline measures to effectively assist displaced persons in improving their living standards and to improve, or at least restore, their former livelihood. In order to achieve this goal the following objectives have been developed:

1. To identify and assess the potential social impacts of the project and recommend mitigation measures (this part was illustrated in the previous paragraph). With regards to the PAPs, who would require some form of assistance (if needed), the goal is to identify and quantify the different categories within which to place them and to prepare the socioeconomic/inventory/census survey accordingly.

2. To describe the existing Egyptian legal and policy framework for land acquisition, and to review the laws and regulations that apply to reclaiming informally settled public and private land, involuntary eviction, and resettlement. Additionally, the aim is to review the EIB Guidance Note on Involuntary Resettlement as well as the World Bank (WB) resettlement policy OP 4.12. This review will seek to identify the gaps between Egyptian legislation and EIB standards.
3. Ensure that the RAP is developed in full compliance with the above mentioned EIB policy.
4. To prepare a detailed entitlement matrix listing all likely effects relevant to classifications related to assets and resources
5. To prepare standards for compensation or restoration of land affected by the project, to set the standards for replacing different types of losses, as appropriate, and to provide resettlement assistance standards that will furnish effective assistance for displaced persons to improve their living standards and improve, or at least restore, their former livelihood.
6. To develop a clear executive time plan for the RAP's implementation, linking the steps of project implementation to the various project components. Furthermore it will include the institutional responsibilities and monitoring parameters.
7. To develop communication and consultation plan for EETC to be implemented throughout the various stages of the project cycle, particularly, during the implementation of the RAP.
8. To identify the institutional responsibility of the implementation and procedures for the grievance redress.
9. To consult the agencies responsible for compensation and land acquisition, such as National Authority for Tunnels, and to determine their roles and responsibilities.
10. To highlight the monitoring, time planning, and implementation procedures. Additionally, to establish a budget for the implementation of the RAP.

## 2.2 Resettlement Action Plan (RAP)

The purpose of the RAP is to:

1. Mitigate the negative impacts of displacement and identify potential development benefits;
2. Establish the entitlements of all categories of affected people, including the host communities;
3. Document all compensation measures and relocation activities;
4. Establish procedures to guarantee fair process to the affected people; and;
5. Establish procedures to monitor and evaluate the implementation of resettlement plans and take corrective action as necessary.

### 2.2.1 Secondary Data Collection Method

#### Literature review

Including laws, legislations (both national and international guidelines and safeguard policies), social baseline data, and the feasibility study of the project as well as previously prepared RAP for projects in and outside of Egypt. Moreover, all basic information related to the PAPs as presented by EETC was reviewed.

## 2.3 Resettlement Action Plan Methodology

The RAP has been prepared by conducting several consultation activities with concerned Governmental departments, PAPs in the villages located in the project area which includes; Umm El Rida village, El Rakabih village, and Gamasa El Baled village, and EETC, the preparation of the RAP is also based on the experience of EETC in other similar projects. The discussion with the concerned bodies included information about the Egyptian Laws, views on the application methods and timing of execution.

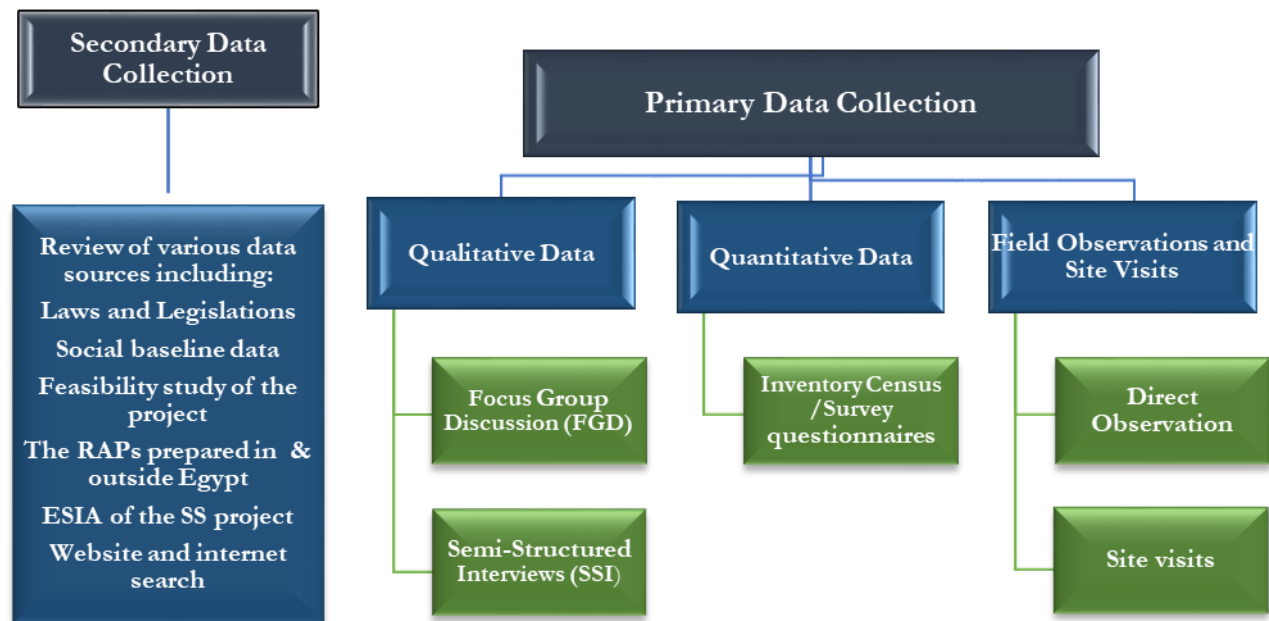


Figure 2-1: Data Scheme of the Resettlement Action Plan (RAP)

### 2.3.1 Primary Data Collection Methods

#### A. Quantitative data: Census/Inventory/Socio Economic Survey

The Study team designed and tested the survey Census/inventory/socio-economic Survey questionnaires for the PAPs. The applied survey covered the whole of PAPs population regardless of the legal status of the affected persons and the affected asset. The survey included the family members along the two OHTLs is (495). The quantitative data collected covered various segments of land-owners, as well as the nature of and the use of their land (the types of crops and trees planted in their lands, the number of structures on plot, if any). The results of survey conducted with the PAPs will be presented in Chapter3.

**Table 2-1: Summary of Project Affected People**

OHTL	No. of PAPs				No. family Members
	No. of Owners	No. of Tenants	Males	Females	
220 kV OHTL New Gamasa SS \ West Damietta power	73	42	105	10	452
220 kV OHTL New Gamasa SS \ Tiba Steel	7	4	8	3	43
<b>Total</b>	80	46	113	13	495

## B. Qualitative Data

In addition to the conventional method of preparing the RAP, namely the inventory survey, the study team utilized additional qualitative research methods, which aimed at assisting the study team in gaining an in-depth understanding of the current socioeconomic and legal conditions of the PAPs, their livelihood dynamics, as well as their compensation preferences.

Qualitative methods could also be employed to investigate the persons that are indirectly affected by the project. Qualitative methods are generally more interactive and provide participatory techniques that can pave the way for the introduction of the structured inventory surveys to the local community, and identify PAPs attitudes towards resettlement activities.

The study team was to approach as many diverse stakeholders as much as possible through the qualitative methods; priority was given to vulnerable groups of PAPs. Another important task for the team was to employ the qualitative tools as part of the community consultation activities. The suggested qualitative methods that were used included:

- Focus Group Discussions (FGDs) with all PAPs
- In-depth Interviews that were applied with:
  - Compensation committee in EETC in order to collect the needed data about the procedures applied for compensation, as well as getting the needed information about the potential PAPs;
  - Representatives of the governorates and the Agricultural associations in order to identify their operational role in the compensation process;
  - NGOs, and community leaders were interviewed in order to identify their role and their perception towards the proposed mitigation measures.

### **The main indicators covered through the FGDs were:**

- Characteristics of the elderly, poor people and sick people
- Their perception towards the project
- Their awareness about the project impacts and the mitigation measures, with emphasis on their own livelihood status
- Their perception towards mitigation measures (after being influenced by the dynamic of the FGDs)

The results of the consultation activities conducted with the PAPs will be presented in Chapter 8.



### 3 CHAPTER THREE: Resettlement Impacts

This section will provide detailed information on the categories and amounts of significant adverse impacts on the affected crops, trees and the project affected households and people.

The project will result in some adverse impacts along the two OHTLs. These impacts will be described below:

The construction and operation phases will include potential impacts on agricultural land during the following operations:

- Digging and the wiring process,
- Access roads-storage areas and foundation area,
- Maintenance of towers and lines

The civil works including the construction and operation phases will lead to some adverse impacts which are:

- Temporary loss of land
- Related to the temporary loss of agricultural land; The crops and the trees located in the agricultural lands where the towers and overhead lines will be installed, for some agricultural seasons during the construction and operation stages

According to the site visits conducted along the route of the above-mentioned OHTLs, the impacts of the project will be limited to agriculture lands (includes loss of income to the farmers) as there are neither industrial, nor residential, nor commercial structures located along the route of the two OHTLs. The compensation for loss of crops and trees is considered as temporary because it is limited to the construction phase. However, during the operation and maintenance phase, there are two types of compensation:

- Permanent compensation will be for the land used by the towers after finishing the excavation and installation work; and
- Temporary compensation will be for the damaged lands impacted in case of maintenance activities.

The New Gamasa GIS Substation SS, EETC has already received the governor's decree to allocate the land for the construction of the proposed SS. From the field observation, the land is an empty flat land that has no other structures. Accordingly, there is no conflict for the future use of the land. In addition, regarding the involuntary resettlement, there will be no involuntary physical resettlement resulting from construction activities.

This impact is not significant, as it will be built on a land already affiliated to EETC and approved by the el Dakahlia Governorate. Therefore, insignificant impact associated to the land use; therefore, no mitigation measures will be developed.

There is no involuntary resettlement induced by the substation; therefore, no RAP, ARAP or RPF is necessary for the SS.

Due to the nature of impacts of the OHTLs (which are mainly impacts on crops and trees), there will be no transitional support activities. There will be no moving costs, temporary living allowance and payment of fees since there will be no physical resettlement of the PAPs.

**Table 3-1: Summary of project impacts for Right-of-Way**

Impact	Area affected (m²)	Use	Ownership	Number of crop holders	No. of PAPs		
					Owners	Tenants	No. family Members
220 kV OHTL New Gamasa SS \ West Damietta power							
Cultivated areas	16038 m²	Agricultural	Private <sup>18</sup>	115	73	42	452
Uncultivated areas	7290 m²	Uncultivated	State-owned	None	None	None	None
220 kV OHTL New Gamasa SS \ Tiba Steel							
Cultivated areas	7290m²	Agricultural	Private	11	4	7	43
Uncultivated areas	1458 m²	Uncultivated	State-owned	None	None	None	None
Total Impact							
Total Impacted Area		Crops/ Trees Compensation		Total Permanent Impacted Land		No. of PAPs	
Cultivated	Uncultivated	Crops	Trees				
23328 m²	8748 m²	4,038,921(EGP) (Corn, Tomato, Rice, Watermelon)	943,250 (EGP) 1258 Palm Trees	1568m²		495	

### 3.1 Impacts during construction

#### 3.1.1 Temporary impacts “Temporary land acquisition”

Temporary land acquisition will be necessary for the following:

- Digging works and the construction of towers, and
- Wiring process.

In regards to the storage area, the implemental company does not need separate lands to store the equipment, as they are stored in either the same lands needed to install the towers and to the wiring process, or in the road reserve after coordinating with the local units and the agricultural association.

The impact duration may remain for one or two or three agricultural seasons according to the nature of the agricultural lands and the time needed to finalize the construction and operation works (the one agricultural season takes maximum 3 months). The crop holder will suffer from the loss of cultivated

<sup>18</sup>Except for the land where tower no. 25 is constructed. It is a state-owned land “please see chapter 1 section 1.3 (220 kV OHTL New Gamasa SS \ West Damietta power)”

crops and trees. The average area of tower digging is  $27 \text{ m} \times 27 \text{ m} = 729 \text{ m}^2$  per each tower. It is the total area of the land affected as a result of excavation and installation work of the OHTL.

Various factors will determine the severity of the impacts. Fundamentally, the economic conditions of the PAP, having alternative source of income, the percentage of the affected lands from the total area that the PAP is cultivating are the main elements that identify the severity of impact. The time of land acquisition in relation to the farming seasons is also an important factor in determining the severity of impacts. Following are the potential severity of impacts according to the expropriation times:

- If the land is expropriated prior to the harvest season, unripe crops might be damaged completely as a result of the project causing the crop-holder losses in terms of financial investment and effort invested in the cultivation of those crops. This will be a complete loss of crops. **In this case the crop holders will receive full compensation for the crops.**
- During harvest season, the crop holder is allowed to harvest the ripe crops allowing him to benefit from the crops. Moreover, s/he will receive their compensation. Consequently, s/he is partially affected as they will not lose their crops. **In this case the crop holders will receive full compensation for the crops in addition to the harvested crops.**
- During the preparation of lands to be cultivated, the farmers will not lose their crops, and they will exert no effort to cultivate the land. This will be minor impact. **In this case crop holders will receive a compensation equivalent to the rent of the land (uncultivated) identified by the agricultural directorate for uncultivated land.**
- **The PIU will ensure that the contractor will return the land to its original status.** The contractor will ensure that the top soil will be stored and reinstalled after completion of the excavation works, before it is returned to owners.

It is difficult to determine at this stage the exact number of PAPs under each category, because this will depend on the implementation plan and its relation to the harvest season.

The project will result in temporary impacts during the construction phase as a result of the wiring process. The project manager reported that the wiring process for the operation of the OHTL will result in temporary impacts on the agricultural crops. He added that the farmers will be compensated for the effects of the wiring process. He stated that the compensation value resulting from the wiring process will not be less than the compensation value paid due to the digging and construction works.

### **3.1.2 Permanent impact**

The permanent impact is limited to the restrictions to plant tall trees that are about 8-12 meter tall, but for the short trees, there will be no restrictions to plant them. The digging works and the construction of towers will result in damaging for trees in the areas. Concerning the Right of Way, it will result in the clearing of tall trees (4 meters tall). The owner of trees is not allowed to plant tall trees or construct buildings under the OHTL Right of Way.

The farm lands located below the transmission line will be obliged to apply certain procedures in order to minimize the unfavourable impacts according to **Electricity law Number 63 of year 1974 bans** any construction under or close to the towers. This is described as a protected area or the right of way. It varies between 12 m from the center of the line to 50 meters on both transmission line sides. The widths of transmission RoW can vary depending on the voltage being carried by the line.

There are several key points to remember when planting vegetation on transmission RoW:

- The farmer should select species which have a maximum mature height of no more than 7 meters.
- Vehicle access along the RoW should not be inhibited. As the maintenance vehicle access is required, only grasses or low growing vegetation should be planted within a distance of 25 meters' from each tower center.

### 3.2 Impacts during operation phase

- The total area needed for a tower is in average 7 x 7 m, depending on the voltage level of each line to which the towers belong (i.e. for 66kV it is 5 x 5 m, for 220kV it is 7 x 7 m and for 500kV it is 8 x 8 m). EETC will compensate PAPs for the entire area underneath the tower, even though it is acknowledged that some limited economic activity may continue after the completion of the works and that according to Electricity Law No 63 of year 1974 this action is not considered to be or does not entail land acquisition

Compensation for land is calculated according to the area of the tower x Number of towers and the market price of the land (The total area needed for the 220kV tower is 7 m x 7 m=49 m<sup>2</sup>, and the total number of towers in the two OHTLs is 32. Therefore, the total affected area will be 49 x 32= 1568 m<sup>2</sup>)

EETC will need to maintain the towers; in case of damaging any crops during the maintenance process, EETC provides compensation to the crop holder.

EETC is complying with the Egyptian and international standards and regulations which define the heights and safety of TL accordingly. No safety and health hazards are foreseen on farmers and land users.

### 3.3 Land requirement by the project

The project will require various types of lands both during the construction and during the operation phases. The project will not result in permanent land acquisition, during the construction and during the operation phases. Following is a summary of the lands required by the project for each OHTL:

#### 1. New Gamasa SS

The new Gamasa SS will be built on a land already affiliated to EETC and approved by the el Dakahlia Governorate. Therefore, insignificant impact associated to the land use; therefore, there is no potential impact of having any involuntary resettlement for this project component (SS). Similarly, there is no impact associated to the involuntary resettlement; therefore, no RAP is necessary for the SS.

#### 2. 220 kV OHTL New Gamasa SS \ West Damietta power

During the construction phase, the compensation for loss of crops and trees is considered as temporary because it is limited to the construction phase, it will be necessary for the digging and the construction works. The total area of the agricultural lands that will be needed along the OHTL route is 729 m<sup>2</sup> x 22 towers = 16038 m<sup>2</sup>, while the total area of the state-owned lands needed is 729 m<sup>2</sup> x 10 towers = 7290 m<sup>2</sup>

During the operation phase, the area of the agricultural lands needed for the operation and maintenance phase of towers and lines will vary according to the distance between the tower and the road separates between the agricultural lands. The farmers will be compensated for any damaged

crops as a result of the operation and maintenance phase of towers and lines it will be a temporary impacts.

### 3. 220 kV OHTL New Gamasa SS \ Tiba Steel

During the construction phase, the total area of the agricultural lands that will be needed temporarily along the OHTL route is  $729 \text{ m}^2 \times 10 \text{ towers} = 7290 \text{ m}^2$ , while the total area of the state-owned lands needed is  $729 \text{ m}^2 \times 2 \text{ towers} = 1458 \text{ m}^2$

### 4. 66 kV OHTL New Gamasa

66 kV, OHTL double circuit AAAC 405 mm<sup>2</sup> Gamasa SS (the old one)/ Balteem and extending its length by approximately  $2 \times 0.15$  kilometres ( $2 \times 150$  meters) (IN/OUT). This is the only OHTL of 66kV associated to New Gamasa SS. The line is already in existence and its route passes through state-owned land. The line consists of 2 towers which are constructed on allocated areas of the industrial zone, on which there is no economic activity. Consequently, no RAP study is anticipated for this OHTL.

**Table 3-2: Summary of project impacts by type of loss**

Impacts	Use		Permanent land acquisition	Affected Trees	No. of PAPs		
	Uncultivated	Cultivated By Crops			Owners	Tenants	No. family Members
<div>The construction and the operation works, Including:</div> <div><div>▪ Digging and the wiring process,</div><div>▪ Access roads-storage areas and foundation area,</div><div>▪ maintenance of towers and lines</div></div>	220 kV OHTL New Gamasa SS \ West Damietta power						
	7290 m <sup>2</sup> State-Owned	16038 m <sup>2</sup> Private Ownership	1078 m <sup>2</sup> Private Ownership	1258 Palm Trees	73	42	452
	220 kV OHTL New Gamasa SS \ Tiba Steel						
	1458 m <sup>2</sup> State-Owned	7290m <sup>2</sup> Private Ownership	490 m <sup>2</sup> Private Ownership	None	4	7	43
Total	8748 m <sup>2</sup>	23328 m <sup>2</sup>	1568 m <sup>2</sup>	1258	77	49	495

### 3.4 Vulnerable groups assistance

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The census survey identified 3 female headed families, and 7% of the total PAPs are elderly and disabled along the two OHTLs. Following is the proposed assistance that will be adopted by the EETC:

- 1- Provide the PAPs with compensation in their premises
- 2- Sufficient and clear information to be provided to them
- 3- Probability of hiring one of their unemployed children

In addition to the above mentioned procedures, it is crucial to pay attention to provide information to the illiterate groups. Thus, information will be attained by the provision of clear satisfactory information to the illiterate head of households.

There are no nomadic people along the lines, we followed the lines and observed no nomadic people or residents only cultivated lands and heaths.

### 3.5 Valuation and compensation

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The valuation methodology of the crops and trees compensation is imperative for the RAP study in order to facilitate the compensation process. There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to the EIB standards. The following are the identified groups of PAPs for this project who are entitled to mitigation/compensation:

1. Temporary (complete or partial) loss of crops and trees in the construction area:

- Farmers / Individuals who have formal legal ownership rights to land
- Farmers / Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights
- Farmers / Individuals who do not have any recognizable legal right or claim to the land: provide compensation for (complete or partial) loss of standing crops, trees, or plants

2. Permanent Loss of standing trees under the towers

The project entitlement matrix was developed based on the EIB standards. It is important to note that the compensation value developed by the Agriculture Directorate is based on the full market price prevailing in the governorate. After finishing the installation of the towers will not be possible to plant trees under the towers (According to Egyptian law too).

Valuation and compensation for lost assets and loss of income and demonstrate that these rates are adequate, i.e. at least equal to the replacement cost of lost assets/income or meeting minimum average wage thresholds. Chapter 8 presents more details about Valuation and compensation.



## 4 CHAPTER FOUR: Socio-Economic Survey

This section will present a summary of the results and findings of the census survey. The census survey covered the project affected people who will lose their crops, and trees due to the installation of the towers and the lines.

The number of owners and tenants along the two OHTLs is 126 persons. The magnitude of impact can be measured by considering the impact on the livelihood of the whole family. The social survey was conducted on allPAPs and their families. A census survey was conducted in the period from April - May 2018.

### 4.1 Survey Preparations

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Prior to the implementation of the project activities the following steps have been taken in order to prepare the RAP and Survey:

- The RoW was identified according to Electricity Law No.63 of year 1974
- The design of the route for the Overhead Lines was finalized
- Letters were sent to Dakahlia, and Damietta Governorates to inform them about the project activities that will be implemented
- Different meetings were conducted with the Compensation Committee and the Social Development Officers in EETC to address the potential project impacts. Later on, preliminary site visits were paid to the PAPs.
- The project affected persons census and compensation form were prepared in cooperation with EETC team.
- Based on the Egyptian regulations for crop compensation, the Agriculture Associations at the affected areas were contacted and interviewed. The Agricultural Directorates developed a list of crops valuation and the other items that necessitate compensation.
- The affected areas were screened during the inventory. The PAPs were addressed according to their type of loss. The two OHTLs were visited in order to identify the affected people there, in addition to highlighting their potential loss of crops, and trees.
- The Study team prepared a structured questionnaire that covers the main socioeconomic conditions that might be affected by the project (See Annex V).

### 4.2 Findings of the census survey

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The following ratios will be calculated according to the total number of the lands' owners and tenants, and the number of their families which is (495 persons)

- The average family size is comprised of 4 people per household.
- Concerning the ownership of lands, the majority of the affected households own their lands. They represent 16% of the total number of households, while the percentage of the land tenants is 9.3% of the total no. of households.

- The majority of the PAPs are males and head of households, they represent about 22.8% of the total number of households, while 2.6% of the PAPs are females.
- Only three females are head of households.
- The elderly and the disabled represent about 7% of the total no. of households.
- In regards to the PAPs education, 26% of the PAPs read and write, 11% are enrolled in schools, 39% have intermediate education, 12% have high education, and 8% are illiterate.
- The majority of the PAPs rely only on farming, which low percentage are either employees or working in trading.
- The average monthly income is not defined as this is mainly based on the agriculture season and the type of crop. However, the monthly expenditure value is less than 1500 EGP.
- In regards to the legality status of the ownership, all of the lands' owners and tenants have a legal status except for the land where tower no. 25 is constructed. One of the residents encroached upon the land and planted it.

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### 4.3 The magnitude of the expected loss

#### 4.3.1 *Magnitude of expected loss according to the area of affected land*

- Those who will lose the crops and trees of less than 10% of their lands will be slightly affected.
- Those who will lose the crops and trees of around 25-30% of their lands will be moderately affected.
- Those who will lose the crops and trees of around 95% of their lands will be severely affected.

#### 4.3.2 *Magnitude of expected loss according to the Right-of-Way*

- The magnitude of loss during harvesting season is relatively limited since the farmers are allowed to harvest their crops. There is a high probability for not interrupting their harvesting activities. Although, they will not be deprived from receiving the full compensation for their crops, EETC will consider enabling the farmers to harvest their crops unless the work plan is severely affected.
- The magnitude of the loss of crops at the beginning of cultivation season is limited due to the fact that the farmer will receive his/her compensation for the plants. However, s/he will be able to replant them within one month (duration to install the towers). In this case, the farmer hasn't invested money or effort in the cultivation process apart from seeding.
- In the middle of the agricultural season is the peak of loss since the farmer would have invested effort and money to cultivate the land. However, s/he will not benefit from the crops. S/he will receive the compensation.

- Permanent loss of trees: The farmer will lose his/her trees permanently. However, s/he retains the right to benefit from the trees by selling them or moving them to any other lands. Moreover, s/he will receive full compensation. That might relieve the severity of impact as s/he will not be able to restore his/her income for at least 3-5 years.

The construction process is limited and the duration will not exceed 3 seasons, and the farmers are compensated before the works commence on the respective plot. The crops' owners will be able to restore their income immediately. However, the owners of trees will not originally be able to restore their income before three years. Therefore, the EETC will do the following in order to assist them: 1) allow them to move the trees during the tower construction, thereafter replant them. As well, EETC will pay them the full compensation of the whole affected trees. In addition, they are allowed to collect the fruit prior to the construction. They can replant the trees after the construction activities.

The tenants are considered as the crops owners. Originally they pay the renting fees for the land owner. Thus, they should be entitled for crop compensation. Yet, the owner is the sole person who allows EETC to get into his lands. Thus, the owner's approval should be attained first. Thereafter, both the tenant and the owner are invited to be consulted with regarding the compensation. The owner receives the compensation and pays the tenant his share, however EETC does not pay the owner the compensations unless in the presence of the tenant, also the EETC ensures the tenant receives his share by supervising the payment. This will take place with the presence of a representative of the agricultural association to witness the process. In addition, the agreement upon the compensation value between EETC and the land owner should contain the Tenant name and his compensation amount as.

## 5 CHAPTER FIVE: Legislative and Regulatory Frameworks

This section aims at summarizing the social legislations, regulations, guidelines (that govern the implementation of the project. This will include reference to Egyptian enabling legislation and major regulations, as well as to EIB standards, Involuntary Resettlement.

### 5.1 Egyptian Legal procedures related to Involuntary Resettlement

The main legislations and guidelines that will be discussed under this section are as follow:

- Law 1/2015 On the amendment of some provisions of Law No. 10 of 1990 on the land acquisition
- Law 10/1990 On Property Expropriation for Public Benefit identifies
- Law 577 of year 1954 and Law 27 of year 1956 for land acquisition
- Law 27 of year 1956
- Egyptian Constitution (That was cancelled after the 25th of January Revolution but main issues related to private ownership was included in the new constitution declaration 2011
- Civil code 131 of year 1948
- Electricity Law 63 of year 1974
- Electricity Law 67 of Year 2006
- Electricity Law No. 87 of Year 2015

**Table 5-1: National regulations related to Involuntary Resettlement**

Title of legislation	Summary and how this legislation applies to this project
<b>Law 1/2015</b>	On the amendment of some provisions of Law No. 10 of 1990 on the land acquisition due to public interest. The amendments provided:  - The first section of article 7 of the law states that: After depositing the compensation, the entity in acquisition charge shall prepare lists with the real estate subject to acquisition, areas, locations, names of owners and property holders, their addresses, and the value of compensations stipulated. These lists and respective maps showing the location of all properties, shall be sited in the head office of the entity in charge, - while article 8 after amendment stated that: "The concerned owners and holders of rights have the right to object to the information contained in such lists within 15 days from the date of posting and publishing the lists and information of the expropriated properties.
<b>Law 10/1990</b>	On Property Expropriation for Public Benefit identifies transportation projects as public benefit activities. It describes acquisition procedures as follows:  1. The procedures start with the declaration of public interest pursuant to the presidential decree accompanied with memorandum on the required project and the complete plan for the project and its structures (Law 59/1979 and Law 3/1982 provided that the Prime Minister issues the decree);  2. The decree and the accompanying memorandum must be published in the

Title of legislation	Summary and how this legislation applies to this project
	<p>official newspapers; a copy for the public is placed in the main offices of the concerned local Government unit.</p> <p>This law has specified, through Article 6, the members of the Compensation Assessment Commission. The commission is made at the Governorate level, and consisting of a delegate from the concerned Ministry's Surveying Body (as President), a delegate from the Agricultural Directorate, a delegate from the Housing and Utilities Directorate, and a delegate from the Real Estate Taxes Directorate in the Governorate. The compensation shall be estimated according to the prevailing market prices at the time of the issuance of the Decree for Expropriation.</p>
<b>Law 577/1954</b>	<b>Law 577/54</b> , which was later amended by Law 252/60 and Law 13/162, and establishes the provisions pertaining to the expropriation of real estate property for public benefit and improvement.
<b>Law 27 of year 1956</b>	<p><b>Law No. 27 of 1956</b>, which stipulates the provisions for expropriation of districts for re-planning, upgrading, and improvement, and the amended and comprehensive Law No.10 of 1990 on the expropriation of real estate for public interest.</p> <p>The <b>first article of Law No. 27 of 1956</b> allows for the expropriation of districts for their improvement, upgrading, re-planning, and reconstruction. Article 24 of Law 577/54 also stipulates that in case only partial expropriation of real estate property is required, and the remaining un-expropriated part will not be of benefit to the owner; the owner shall be given the right to submit a request within 30 days (beginning from the date of final disclosure of the list of the expropriated property) for the purchase of the entire area.</p> <p>It should be noted, that the new law has not restricted the right to request the purchase of the remaining un-expropriated portion of real estate whether it is a building or land.</p>
<b>Egyptian Constitution (That was cancelled after the 25th of January Revolution but main issues related to private ownership was included in the new constitution declaration 2011)</b>	<p><b>The Constitution Chapter Two Part One: Social and Moral components</b></p> <p>The State shall guarantee equality of opportunity to all Egyptians and coordination between woman's duties towards her family and her work in the society, considering her equal to man in the political, social, cultural and economic spheres without detriment to the rules of Islamic jurisprudence</p>
	<p><b>The Constitution Chapter Two: Economical components</b></p> <p><b>Article 29</b></p> <p>States that ownership subject to the control of people is protected by the State, and is divided into three types: public, co-operative and private property.</p>
<b>Civil code 131 of year 1948</b>	<p><b>Articles 802-805 recognizes private ownership right.</b></p> <ul style="list-style-type: none"> <li>Article 802 states that the owner, pursuant to the Law, has the sole right of</li> </ul>

Title of legislation	Summary and how this legislation applies to this project
	<p>using and/or disposing his property.</p> <ul style="list-style-type: none"> <li>• Article 803 defines what is meant by land property</li> <li>• Article 805 states that no one may be deprived of his property except in cases prescribed by Law and would take place with an equitable compensation.</li> </ul>
<p><b>Electricity Law 63 of year 1974</b></p>	<p>The People Assembly passes the bill of Electricity Law 63 of year 1974 (article 1 and 2) that regulates mechanism and the responsibilities of the owner or squatter that passes the land (overhead or underground cable) and the limit of the distance set for the different capacity of the power lines.</p> <p>The law has discussed in article 6, the limits of distances to be measured from the axis of the overhead /aerial lines route as well as the cables to be as follows:</p> <ol style="list-style-type: none"> <li>1) Twenty five meters in the case of overhead ultrahigh voltage lines.</li> <li>2) Thirteen meters in the case of overhead high voltage lines.</li> <li>3) Five meters from the medium voltage lines.</li> <li>4) Five meters in the case of High Voltage Cables.</li> <li>5) Two meters in the case of Medium and Low Voltage Cables.</li> </ol> <p>Both articles 7 and 8 have discussed the compensation that shall be paid the owners of shareholders if any damage caused to them. It also discussed the estimation of the compensation through a committee to be selected by the Minister of Electricity and Energy, with the membership of (a representative of Ministry of Agriculture and Land Reclamation- a representative of the Egyptian Survey Authority- a representative of the Governorate- and representatives of the Local Popular Council- plus an invitee to be selected by the committee).</p> <p>Articles 10 and 11 of the Law emphasized on the importance of reaching an agreement with the owners on the compensation amount.</p> <p>According to the Electricity Law articles 12 and 13 the owner/the tenants has the right to raise formal complaints to the Compensation Committee in 15 days after receiving the compensation value notice. They also can raise their complaints within 30 days after getting the compensation value notice.</p> <p>This law is applicable in RAP as it might necessitate certain mitigation measures to the farmers who will not be able to plant trees under the ROW.</p>
<p><b>Electricity Law No. 67 of Year 2006</b></p>	<p>Electricity Law 67/2006 was issued for the sake of protecting the consumer. Article 2 of this law, states that the consumer's rights must not be compromised, including the consumer's right to access to knowledge on the protection of his legitimate rights and interests in order to ensure that he is aware of the party whom he can refer to in case of any complaints. The consumer also has the right to bring lawsuits on all that would prejudice or damage his rights or restrict them. The service provider also must supply the consumer with correct information about the nature and characteristics of the product – which is indicated in this report as "the electricity" - to avoid misleading the consumers or the beneficiaries of the service causing them to fall</p>



Title of legislation	Summary and how this legislation applies to this project
	<p>into error or mistake.</p> <p>Under this law, an agency should be established for the protection of the consumer and his interests. The Egyptian Electric Utility &amp; Consumer Protection Regulatory Agency is the authority competent for the protection of the consumer in the electricity sector. In regard of electricity tariff and collection fee, EETC is already provides the certain fees regulation and fees collection system, to provide all diverse consumers.</p> <p>In addition to the previously mentioned laws, the following laws and decrees are applicable to the proposed project:</p> <ul style="list-style-type: none"> <li>• Decree 458/2007; Egyptian Drinking Water Quality Standards adopted by the Ministry of Health;</li> <li>• Law 102/1983; Natural Protectorates;</li> <li>• Law 12/2003, Articles 204-207; Construction Work License; and</li> <li>• Law 66/1973; Traffic law according to noise and emissions.</li> </ul>
<b>Electricity Law No. 87 of Year 2015</b>	<p>Electricity Law 87/2015 addresses the limits of distances to be measured from the axis of the OHTL routes as well as the underground cables, which should be kept away from the infrastructures and development areas.</p> <p>Chapter 5 of law 87/2015 stipulates proceedings as follows:</p> <p><u>Land Acquisition:</u> Article 53, 55 and 62 addresses matters pertaining to land acquisition resulting from electricity projects and covers the compensation, the formation and responsibilities of the compensation committee, addressing grievances as well as specifications for the right of way.</p> <p><u>Addressing Grievances:</u> Article 53 further stipulates the owner/the tenants may submit written grievances/objections within 15 days from receiving the notice of forthcoming construction activities. Rejected objections will need a decision from the relevant minister to be implemented. Further grievances may be taken to the specialized courts.</p> <p><u>Right of Way:</u> Article 55 of the law specifies the distances to be measured and cleared from the axis of the OHTL routes as well as the underground cables, which should be kept away from the infrastructures and development areas tall trees, buildings and structures for the axis of the overhead/aerial lines routes as well as the cables. These paths are called the Right of Way (RoW). Following are the specifications:</p> <ul style="list-style-type: none"> <li>• Twenty five meters in the case of overhead ultrahigh voltage lines (OUHVL). (132+kV)</li> <li>• Thirteen meters in the case of overhead high voltage lines (HVL). (33kV – 66kV)</li> <li>• Five meters from the medium voltage lines (MVL). (1kV – 33kV)</li> <li>• Two meters in the case of low voltage lines (HVL). (up to 1kV)</li> </ul>

Egyptian ownership legislation defined certain types of ownership of lands. According to the Egyptian law the following table presents the types of lands ownership:

**Table 5-2: Type of land ownership in Egypt**

Land ownership type	Description
<b>Public or State land<sup>19</sup></b>	(in Arabic <i>Amlak Amiriya</i> ), which is divided into the State's public domain that cannot be alienated and the State's private domain, which can be alienated generally through sale, lease, <i>Takehssiss</i> (i.e. transfer of ownership conditional on meeting certain criteria, such as keeping the land use unchanged and paying the remaining instalments of the land price) or through <i>Haq Intifaa</i> ,
<b>Private land</b>	(in Arabic <i>Mulk horr</i> ), which may be alienated/transferred freely
<b>Endowment land</b>	<i>Waqf</i> and (land held as a trust/endowment for religious or charitable purposes), which is often subject to covenants on transfer or use, and which is typically transferred through leasehold or usufruct.
<b>Customary rights</b>	There are some areas in Sinai and in the northern coast with implicitly recognized to land ( <i>Urfi</i> ) to the benefit of Bedouins. In these areas, someone wishing to acquire land often has to make two payments, first to the Bedouin claimant(s) for the right of use and then to the State to regularize and register their land tenure/ownership and be able to obtain services.

It is important to note that the Civil Code (No. 131 of 1948) recognizes (*Hiyaza*) (i.e. possession of immovable/movable property without ownership) as a legitimate channel to acquire ownership of the property in question through adverse possession, provided that the (*Hiyaza*) has been “peaceful, unchallenged and uninterrupted” for a period of 15 years<sup>20</sup>. By Law, ownership through adverse possession does not, however, apply to State lands.

<sup>19</sup>The large majority of land in Egypt is public or State-owned desert land that is for the most part undeveloped (estimated to be 90-95% of the national territory).

<sup>20</sup>The large majority of land in Egypt is public or State-owned desert land that is for the most part undeveloped (estimated to be 90-95% of the national territory).

## 6 CHAPTER SIX: The EIB Environmental and Social Handbook (2013)

### 6.1 EIB Standard 6: Involuntary Resettlement

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Projects often necessitate land acquisition, expropriation and/or restrictions on land use, resulting in the temporary or permanent resettlement of people from their original places of residence or their economic activities or subsistence practices. When affected persons and communities do not have the choice to refuse such displacement, this process is known as involuntary resettlement.

The complexity of displacement must be duly appreciated and its impact and remedy carefully analyzed, planned and delivered as it may negatively affect the economic and social well-being of affected people and provoke severe economic and social problems in the origin and host communities. Income sources can be irreparably lost, people can be relocated to environments where their skills may be less applicable and monetary compensation may not be sufficient to prevent long-term hardship or disadvantage.

Project-induced involuntary resettlement should be avoided by analyzing alternative project designs and locations. If it is unavoidable, the promoter, with full involvement in the decision-making process of all stakeholders, and in particular the affected people, should adopt adequate steps to minimize and mitigate its adverse impacts from an early stage. Resettlement is a process to assist those displaced to replace their housing, assets, livelihoods, land, access to resources and services and to improve or at least restore their socioeconomic and cultural conditions to those levels existing prior to the project.

### 6.2 Resettlement Action plan

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Displaying due regard for the equal protection of women and vulnerable groups or minority rights, the RAP delineates measures to:

1. Mitigate the negative impacts of resettlement and identify potential development benefits;
2. Assure that the rights and interests of project-affected people are respected and protected, in particular those deemed vulnerable;
3. Establish the entitlements of all categories of affected people, including the host communities;
4. Introduce any additional accompanying measures for vulnerable affected persons, if relevant;
5. Document all compensation measures and relocation activities;
6. Establish procedures to document all compensation measures and relocation activities and guarantee due process to the affected people, such as meaningful consultation, adequate information to the affected people and sufficient notice before eviction, together with a free and independent grievance mechanism; and
7. Establish organizational arrangements and procedures to monitor the implementation of resettlement plans and take corrective actions as necessary.

At a minimum, the RAP should:

1. State the resettlement guiding principles and objectives;
2. Describe the nature and magnitude of project impacts and identify all people to be displaced, paying special attention to vulnerable groups;

3. Carry out a census to establish the number of people to be displaced, livelihoods affected, property to be compensated and the cut-off date for eligibility claims;
4. Describe the legal framework expected to guide this Plan's land acquisition (when applicable), compensation, resolution of conflicts and appeals procedures;
5. Include an analysis of applicable national legislation, highlighting gaps with EIB requirements and required bridging measures;
6. Propose how to fill the gaps between national law and EIB requirements should such gaps be identified;
7. Describe institutional set-up and responsibilities;
8. Establish the eligibility criteria and describe the entitlements for all categories of displaced people and types of impacts suffered;
9. Describe how affected populations, including women, minorities and other vulnerable groups, have been effectively consulted and how their views were taken into account;
10. Include valuation of and compensation for lost assets and loss of income and demonstrate that these rates are adequate, i.e. at least equal to the replacement cost of lost assets/income or meeting minimum average wage thresholds;
11. Provide details of sustainable arrangements for improving the standards of living of displaced persons;
12. Provide details of sustainable arrangement for improving or, at minimum, restoring livelihoods;
13. Prepare a grievance mechanism for the settlement of disputes arising from resettlement related issues ensuring access to grievance and recourse for all affected persons; and,
14. Include implementation schedule, budgets, and arrangements for monitoring and evaluation.

It should be noted that an RPF was indeed done, and that this RAP follows the steps indicated in the RPF, and that it is available on EETC's website ([http://www.moec.gov.eg/test\\_new/home.aspx](http://www.moec.gov.eg/test_new/home.aspx)).

### 6.3 Implementation and Monitoring

The promoter shall set up necessary systems (i.e. resources, staff, and procedures) to monitor the implementation of a RAP on a regular basis and take corrective action as necessary. Affected persons will be consulted as part of the monitoring activities. The implementation and effectiveness of the resettlement action plan shall be subject to monitoring and review by qualified resettlement specialists and/or other independent third parties as appropriate and commensurate to the scale and risks involved in the resettlement.

Implementation of a RAP will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan and requirements outlined in this RAP

### 6.4 Standard 7: Rights and Interests of Vulnerable Groups

Standard 7 sets out to avoid or minimize, or otherwise mitigate and remedy<sup>21</sup>, potential harmful effects of EIB operations to vulnerable individuals and groups whilst seeking that these populations duly benefit from such operations. As a means to foster those project outcomes, Standard 7 proposes

a framework and tools to address inequalities and other factors contributing to vulnerability, and, as appropriate, to allow for equal access to and enjoyment of project benefits for those individuals and groups.

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## **7 CHAPTER SEVEN: Gaps between Egyptian Legislations and the EIB standards**

The analysis of the aforementioned legislations showed that the project will face minor discrepancy between different legislations. Therefore, it was relatively crucial to present the gaps between various legislations and the mechanism that will be adopted by EETC in order to bridge those gaps.

In the following table, the column 'Status' identifies whether the topic is relevant, i.e. present or non-present, to the components of the project.



**Table 7-1: Comparison of Egyptian regulations with the EIB requirements and measures for bridging the gaps**

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
<b>Property Valuation/compensation</b>	The unit rates used for compensating property and assets are based on the concept of full market price. This is not consistent with the full replacement cost adopted by the lender.	<p>For the EIB, those people whose livelihoods are negatively affected by a project should have their livelihoods improved or at minimum restored and/or adequately compensated for any losses incurred. As such, where physical or economic displacement is unavoidable, the Bank requires the promoter to develop an acceptable Resettlement Action Plan. The plan should incorporate and follow the right to due process, and to meaningful and culturally appropriate consultation and participation, including that of host communities.</p> <p>In cases of loss of land for households with land-based livelihoods, affected people must first be offered alternative land of better or equal quality.</p> <p>In cases of loss of housing, compensation for houses and other structures should be equivalent to replacement cost plus relocation costs. Depreciation of assets or the value of salvage materials shall not be deducted from the value of</p>	<p>The EETC is required to calculate the compensation value throughout the life of the project (digging, construction, and operation); with full replacement cost, in accordance to the market value at the time of compensation.</p> <p>In case of providing cash compensation, EETC has to ensure that the value of the crops and trees is equivalent to the market price. This is in order to be consistent with the "full replacement cost requirement." "Replacement cost" refers to the value determined to be fair compensation for: (i) land, based on its productive potential; (ii) houses and structures, based on the current market price of building materials, and labor without depreciation or deductions for salvaged building material, and (iii) residential land, crops, trees, and other commodities, based on their market value. Such cost needs to be further accounted for in case of any removal costs, utility</p>	Relevant to the lines OHTLs only

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
		<p>replacement cost.</p> <p>Where the option of cash compensation or alternative accommodation is provided, the cost estimates for providing alternative accommodation could be used for calculating cash compensation payable. For movable structures, such as kiosks or stalls, comparable replacement sites should be offered. A good practice is to calculate replacement cost for such structures as the cost of alternative sites, the cost of replacing improvements (such as foundations), and relocation expenses or other transaction costs.</p>	<p>connection costs, taxation costs imposed on new housing/re-established businesses etc. Where markets do not exist, surrogate values must be determined (see EIB Handbook 2013 standard 6, p. 54).</p>	
<b>The cut-off date</b>	There is no cut-off date under the Egyptian laws.	The WB identifies a cut-off date in order to prevent people influx to the project area. This measure is stipulated in order to protect the project owner and to prevent wasting of resources. The Egyptian laws never set a cut-off date. The cut-off date is the day the census starts.	The potential date for the start of the construction is September 2019 which is considered the cut-off date. Construction activities will start after completing the compensation activities. It is important to note that the project implementation will start with a cut-off date, after approval from the EIB. The public disclosure of the project is done through the stakeholder engagement sessions,	Relevant to the lines OHTLs only

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
			and notify the heads of the agricultural associations in project area; given to their ability to communicate directly with farmers.	
<b>Temporary loss of structure (For title and non-title holders)</b>	In compensating temporarily occupied structure, Egyptian law requires determination of the price per room or area to arrive at the market value. The law also provides tenants with an option to acquire alternative shelter but requires them to pay the difference, if any, in price.	The Bank's policy in involuntary resettlement requires: (i) compensation to restore the structure to its original condition, (ii) inconvenience allowance if the temporary land acquisition produces minor difficulties and, (iii) alternative comparable accommodations, rental allowance for equivalent temporary housing, or payment for constructing temporary housing of a reasonable equivalent standard can be provided. If structures themselves are temporarily acquired, or use of the structure is precluded, compensation for moving and restoration expenses are covered.	Dialogue with Egyptian authority on the Bank's policy in involuntary resettlement with focus on compensation for: (i) temporary land acquisition with minor inconvenience; (ii) structures that are temporarily acquired; (iii) precluding use of the structure and (iii) moving and restoration expenses.  EETC is committed to compensating all PAPs whether they are title or non-title holders so to restore their livelihoods in accordance to the Bank's requirements EIB.	<b>There's no temporary loss of structure (For title and non-title holders)</b>  Relevant to the lines OHTLs only
<b>Compensation eligibility</b>	Under Egyptian law, the only people and entities entitled for compensation are those with registered property rights, for example, registered	<ul style="list-style-type: none"> <li>Eligibility Criteria for compensation under EIB/IFC/ OP 4.12:               <ul style="list-style-type: none"> <li>(a) those who have formal legal rights to land (including customary and traditional rights recognized under the laws of</li> </ul> </li> </ul>	<p>The categories of people who must be compensated under Egyptian legislation are narrower than those defined under EIB/IFC/ OP 4.12.</p> <p>Under this project all the categories (a,b,c) will be</p>	In the current project will be compensated those who have formal legal rights to land, those who do not have formal legal rights to land, and those who have no recognizable legal right or claim to the land they are

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
	landowners, occupants, users and those with registered third party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration. This potentially disqualifies many categories of affected people that would be entitled to compensation under EIB and the OP 4.12.	<p>the country);</p> <p>(b) those who do not have formal legal rights to land, at the time the census begins, but have a claim to such land or assets; provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan;</p> <p>(c) those who have no recognizable legal right or claim to the land they are occupying.</p> <ul style="list-style-type: none"> <li>• To determine eligibility:</li> <li>• Carry out resettlement census. Cut-off date for eligibility is the day when the census begins.</li> </ul> <p>Under the EIB/ IFC and OP 4.12 all the land needed for a project is subject to compensation</p>	<p>considered for compensation in accordance to EIB/IFC/ OP4.,12.</p> <p>Resettlement assistance should be provided in order to improve the PAPs livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p> <p>Accordingly, individuals under category a and b, should be compensated at full replacement cost and EIB requires payment prior to acquisition.</p> <p>While those who are using land but have no recognizable legal rights or claim (i.e. individuals under category c) will be compensated for their investments on the land in order to improve their livelihoods or at least to restore to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.</p>	<p>occupying.</p> <p>Relevant to the lines OHTLs only</p>

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
<b>The right of squatters</b>	Not included in the legislation  (Applied cases for resettlements revealed that squatters have been compensated as a result of political sensitivity)	The right of squatters is not addressed in Egyptian law, the Bank's policy requires squatters be provided with compensation for loss of structures/loss of economic activities/livelihoods and resettlement assistance when they are affected by projects financed by the Bank, but no compensation for the land the squatters are occupying. Egyptian legislation has not recognized the rights of squatters. There have been resettlement cases in which the Egyptian government compensated squatters because of political sensitivity to the problem rather than because of provisions in the law or in compliance with the Bank's policy.	Egyptian practices regarding the right of squatters can be employed to deepen discussion leading toward legislative solutions. The Bank's discussion with Egyptian authorities may help address and formalize the treatment of squatters in line with the Bank standards.  EETC is committed to compensating all PAPs whether they are title or non-title holders so to restore their livelihoods in accordance to the Bank's requirements EIB.	Relevant to the lines OHTLs only
<b>Livelihood/income restoration and assistance</b>	Egyptian regulations do not specify income restoration allowances where the PAPs incurred losses of business income.	EIB standard 6, p.57 requires that all affected persons will be paid fair compensation in good time for expropriated assets.  Compensation should be provided for any loss of personal, real or other property, goods or assets, including rights or interests in property, for instance, land plots and house structures, contents,	EETC is to define livelihood restoration, provide selection criteria for the members of the compensation committee, and describe future engagement of EETC with committee to the satisfaction of the Bank.  Hence, EIB principle regarding income restoration will be considered. Therefore, those	Livelihood/income restoration and assistance should be developed in this RAP, Through compensation losses of crops and trees,  As it is the source of income for farmers  Relevant to the lines OHTLs only

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
		infrastructure, mortgage or other debt penalties.  Where land has been taken, affected persons should be compensated with land of commensurate quality, size and value, or better.	whose income is going to be affected will be compensated for the loss of profit and income.	
<b>Calculation of Compensation</b>	According to prevailing prices in the affected area and assessed by a specialized committee for that purpose	Full replacement cost	EETC should build their estimation on full replacement cost to be adopted to the EIB standards.  Third party/objective evaluation is necessary	Relevant to the lines OHTLs only
<b>Vulnerable groups</b>	Egyptian regulations have not addressed how vulnerable groups affected by expropriation of property should be treated	The EIB standard 7 stipulates the importance of paying attention to the minority rights and non-discrimination in the EU. Minority protection and participation are inherent in the EU's founding principles and in the principles of subsidiarity. The evolution of human rights protection has strengthened anti-discrimination legislation particularly with respect to women and to employment. Similar protection remains to be developed for ethno-cultural diversity. Protection of minorities	Poor marginalized people and those with handicaps have to be engaged in the project by inviting them to the stakeholder engagement activities and consultations.  EETC needs to conduct a social survey covering the entire transmission line in order to identify all vulnerable groups. The impacts of the project have to be assessed so to inform EETC of the compensation and assistance that will be provided to vulnerable groups. Such social survey should	Relevant to the lines OHTLs only



Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
		and indigenous peoples is limited to dealings with external partners.	be developed in this RAP to identify all vulnerable groups. Specifically, site visits have to be paid to the vulnerable groups in order to inform them about the project and its positive and adverse impacts. Additionally, they are to be informed about the grievance mechanism and given the contacts of the compensation committee in order to get the needed information.	
<b>Access to timely and relevant information</b>	Egyptian law stipulates that PAPs be provided with timely and relevant information.	EIB standard 10 on Stakeholder Engagement P.89 focuses on that “the timely disclosure of relevant project information enables stakeholders to understand the project’s risks, impacts and opportunities. Mindful of this and as foreseen in the Stakeholder Engagement Plan, the promoter will provide identified stakeholders with relevant information in a timely and appropriate manner. The promoter will further disclose and grant access to relevant information to any other interested party as appropriate.	EETC launched comprehensive Stakeholder engagement activities that will continue along the life of the project. Integration of community based organization will be the key to provide satisfactory level of information.	Relevant to the substation and lines OHTLs  All the consultation activities that EETC will take in the context of this project should be included in the RAP study.  The consultation activities have been conducted for the SS, were included in the ESIA study
<b>Grievances &amp; Redress</b>	Egyptian law allows the creation of	The Grievance Mechanism according to EIB standard 6 on	It is essential for the EETC to establish a GRM that is acceptable	Relevant to the substation and

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
<b>Mechanisms</b>	<p>“Specialized Committees” to address grievances originating from misunderstandings of project policy, or resulting from conflicts among neighbors. The law allows one month to object to the decision of resettlement, four months to seek redress to the compensation value and three months in case of dispute between several individuals or parties on a single property.</p> <p>Court cases in Egypt are known to require long periods of time before settlements can be reached. With intent to address the lengthy time the Egyptian court may</p>	<p>Involuntary Resettlement p. 59 is “The promoter shall set up and maintain a grievance mechanism that is independent, free and in line with the requirements set out in Standard 10 and that will allow prompt addressing of specific concerns about compensation and relocation from the affected people and host communities and other directly involved entities. The mechanism should be easily accessible, culturally appropriate, widely publicized, and well integrated in the promoter’s project management system. It should enable the promoter to receive and resolve specific grievances related to compensation and relocation by affected persons or members of host communities, and use the grievance log to monitor cases and improve the resettlement process.</p>	<p>and accessible to community members. It would serve as the first stop for people who have a grievance and will have several channels for them to complain.<sup>21</sup> All petitions will be listened and responded to and a due procedure of handling and managing grievances will be set. Moreover, their social development officers will gain information about how to document the grievances, and how to transfer them to the interested entity.</p> <p>They should be informed that they can take the case to the court. If need arises, aggrieved people would however remain free to open a Court case without having registered their grievance with the GRM. The grievance mechanism should be set up and maintain in line with the Standard 10 of the EIB.</p> <p>Such GRM should be developed in this RAP to identify all vulnerable groups.</p>	<p>lines OHTLs</p> <p>The GRM for the SS, were included in the ESIA study</p> <p><b>(For perusal and review <a href="http://www.moe.gov.eg/test_new/home.aspx">http://www.moe.gov.eg/test_new/home.aspx</a>)</b></p>

<sup>21</sup>The GRM is fully discussed in Chapter 10.

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
	require to process and resolve disputes.			
<b>Consultation</b>	There is no explicit consultation requirement in the Egyptian law. However, people in the affected communities are usually informed about the project.	<ul style="list-style-type: none"> <li>Under EIB/IFC/OP 4.12 the affected communities and individuals should be consulted and contribute to the processes of land acquisition and resettlement.</li> </ul> <p>Consultation with the affected PAP should be documented.</p>	<p>Affected groups should have access to full information about the resettlement process and options for compensation.</p> <p>Participatory planning and decision making should be applied in resettlement options and compensation</p>	<p>Relevant to the substation and lines OHTLs</p> <p>The consultation activities have been conducted for the SS, were included in the ESIA study</p>
Monitoring and Evaluation	The absence of monitoring and evaluation measures in Egyptian laws illustrates differences between the two systems. The lack of legally authorized resources can constrain accountability and governance mechanisms of Bank financed projects. The lack of equivalency between the Bank's and Egyptian policy can negatively impact on	<p>According to EIB standard 10 on Stakeholder Engagement P. 92 the engagement with stakeholders during the life of a project is a dynamic and challenging process. Promoters are required to monitor the implementation of the stakeholder engagement plan and the performance of the grievance mechanism and report on both. In accordance to and as an integral component of a project's Environmental and Social Management System, monitoring and reporting procedures must be established early on in the operation by the promoter.</p> <p>In terms of monitoring, the</p>	<p>It is imperative the Bank move toward advancing the monitoring and evaluation principles stated in EIB standard 10.</p> <p>As such, the EETC is to develop an M&amp;E and reporting system for the project that is to the satisfaction of the EIB. This is to ensure that the monitoring and reporting that is to take place is done according to EIB standards.</p>	Relevant to the lines OHTLs only

Topic	Egyptian legislative requirements	EIB policy requirement	Measures for bridging the gaps	Status Relevant/ Irrelevant
	the very idea of the consultation, decision making and disclosure principles charted in the Bank's OP 4.12.	<p>promoter will arrange for all necessary provisions to assure stakeholder engagement during the monitoring phase. Thereby, the promoter will endeavour to involve independent third parties (e.g. CSOs, NGOs, and national human rights institutions) or to facilitate community-driven monitoring, where practical and acceptable by the communities concerned.</p> <p>In terms of reporting, the promoter will establish regular communication and reporting channels back to the communities and individuals impacted and concerned, whether through non-technical summaries of progress updates, engagement activities, public meetings, targeted issue-based hearings.</p>		

## 8 CHAPTER EIGHT: Valuation and Compensation

The valuation methodology of the crops and trees compensation is imperative for the RAP study in order to facilitate the compensation process. Following is a discussion of the valuation process adopted per each type of loss.

### 8.1 Eligibility criteria and Matrix

There are various categories of PAPs who are entitled to compensation and socio-economic restoration according to the EIB standards. The following are the identified groups of project-affected persons (PAPs) for this project who are entitled to mitigation/compensation:

#### 1. Temporary (complete or partial) loss of crops and trees in the construction area:

- Farmers / Individuals who have formal legal ownership rights to land
- Farmers /Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights
- Farmers / Individuals who do not have any recognizable legal right or claim to the land: provide compensation for (complete or partial) loss of standing crops, trees, or plants

It must be noted that EETC pays the compensation to the crop holder regardless of their status.

Although Egyptian legislation has not mention of entitlement to compensation for those who do not have legal rights, EETC pays the compensation to the crop holder regardless of their status.

#### 2. Permanent Loss of standing trees under the towers

The project entitlement matrix was developed based on the EIB standards and the compensation will be paid according to the bank's regulations. It is important to note that the compensation value developed by the Agriculture Directorate is based on the full market price prevailing in the governorate.

In the following table, the column 'Status' identifies whether the topic is relevant, i.e. present or non-present, to the components of the project.

**Table 8-1: Entitlement Matrix for Affected Persons**

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
<b>Agricultural Land</b>					
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> <li>• Provide cash compensation at replacement cost for the lost land<sup>22</sup>, in addition to the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.</li> <li>• Provide cash compensation for loss of crops or trees at replacement cost.</li> </ul>	<ul style="list-style-type: none"> <li>• A list of available arable and grazing land in each affected area</li> <li>• Consultations and formal agreement with PAPs on type of compensation (cash or in-kind)</li> <li>• If available and requested by the PAPs and agreed to by the sub-project and concerned authorities: provide equivalent land nearby, of similar size, value, and quality</li> </ul>	<b>Relevant</b>
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> <li>• Provide development and transitional assistance in locating new replacement lease land.</li> <li>• Provide cash compensation for loss of crops or trees at replacement cost.</li> </ul>	<ul style="list-style-type: none"> <li>• In case of relocation, provide assistance to farmers during and after the relocation process</li> <li>• Provision of assistance to farmers to develop new crops</li> </ul>	<b>Relevant</b>

<sup>22</sup>Calculated at entitlement cut-off date.



Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
				<p>and improve production for both crops and livestock</p> <ul style="list-style-type: none"> <li>Poor and vulnerable PAPs (including the landless) will not be displaced until replacement land is provided</li> <li>For the transitional period, it is recommended that:</li> </ul> <p>Transitional assistance should be provided at least six months are provided if not more for all PAPs .Market value of the crops should be considered</p> <p>Which is calculated based on besides the transitional cycle of re-growing the same type of crop, plus cost involved.</p>	
Loss of arable and grazing agricultural land or access to it	Permanent (complete or partial) loss of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> <li>No compensation for land.</li> <li>Provide landless PAPs with resettlement assistance in securing temporary or lease rights to replacement land</li> <li>Provide cash compensation for loss of crops or trees at replacement cost.</li> </ul>		<b>Relevant</b>
Loss of arable and grazing agricultural land or access to it	Temporary (complete or partial) loss of all or part of arable and grazing land located in the sub-project site	Farmers/Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> <li>No compensation for land if returned to owner in less than one year.</li> <li>Provide cash compensation equivalent to the replacement cost at market price of renting the land</li> </ul>	<ul style="list-style-type: none"> <li>If the temporary loss continues for more than one year, PAPs will be given a choice of either continuing with the temporary arrangements, or selling the affected land to the sub-</li> </ul>	<b>Relevant</b>

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
			<p>during the temporary use.</p> <ul style="list-style-type: none"> <li>• Provide cash compensation for loss of crops or trees at replacement cost and compensation for loss of net income from subsequent crops that cannot be planted for the duration of the lease.</li> </ul>	<p>project at full replacement cost at current market value</p> <ul style="list-style-type: none"> <li>• Provision of development assistance to enable farmers/land owners to restore land to its previous condition or better quality by providing measures to improve land quality in cases of land being adversely affected.</li> </ul>	
Loss of arable and grazing agricultural land or access to it	Temporary (complete or partial) loss of all or part of arable and grazing land located in the sub-project site	Farmers/Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> <li>• No compensation for land if returned to owner in less than one year.</li> <li>• Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use.</li> <li>• Provide cash compensation for loss of crops or trees at replacement cost and compensation for loss of net income from subsequent crops that cannot be planted for the duration of the lease.</li> </ul>		<b>Relevant</b>
Loss of arable and grazing	Temporary (complete or partial) loss of all	Farmers/Individuals who do not have any	<ul style="list-style-type: none"> <li>• No compensation for land if returned to owner in less</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of development and resettlement assistance to</li> </ul>	<b>Relevant</b>

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
agricultural land or access to it	or part of arable and grazing land located in the sub-project site	recognizable legal right or claim to the land	<p>than one year.</p> <ul style="list-style-type: none"> <li>Provide cash compensation for loss of crops or trees at replacement cost.</li> </ul>	landless PAPs with no legal rights.	
<b>Urban Land (Residential and/or Commercial)</b>					
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> <li>Provide cash compensation at replacement cost of land of equal size and use, with similar or improved public infrastructure facilities and services and located in the vicinity of the affected land, plus the cost of any registration and transfer taxes.</li> <li>In the case that there are structures on the land, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure.</li> </ul>	<ul style="list-style-type: none"> <li>A list of available non-arable land in each affected area</li> <li>A list of PAP and entitled persons</li> <li>Consultations and formal agreement with PAPs on type of compensation (cash or in-kind)</li> <li>If available and requested by the PAPs and agreed to by the sub-project and concerned authorities: provide equivalent land nearby, of similar size, value, and quality</li> </ul>	<b>Irrelevant</b>

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> <li>In the case where there are structures on the land which have been built by the users, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure.</li> <li>Provide development and transitional assistance in locating new replacement lease land</li> </ul>	<ul style="list-style-type: none"> <li>Provision of development and resettlement assistance, mainly in form of transition allowances for severely affected PAPs (transition subsistence allowance for food, moving incentive allowance, assistance in locating new residential or commercial leasing, and income transition allowance if businesses are affected).</li> </ul>	Irrelevant
Loss of urban residential or commercial non-arable land or access to it	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> <li>Provide no compensation for land.</li> <li>In case that there are structures on the land which have been built by the users, provide cash compensation at replacement cost for the materials used to rebuild the structures or to partially repair an affected structure.</li> <li>Provide landless PAPs with resettlement and</li> </ul>	<ul style="list-style-type: none"> <li>For the transitional period, it is recommended that: Transitional assistance should be provided at least six months are provided if not more for all PAPs.</li> </ul>	Irrelevant

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
			transitional assistance to secure alternative commercial or residential land and to restore their livelihoods.		
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who have formal legal ownership rights to land	<ul style="list-style-type: none"> <li>No compensation for land if returned to owner in less than one year.</li> <li>Provide cash compensation equivalent to the replacement cost at market price of renting the land during the temporary use</li> <li>Provide cash compensation for loss of crops, trees, or structures at replacement cost</li> </ul>	<ul style="list-style-type: none"> <li>If the temporary loss continues for more than one year, PAPs will be given a choice of either continuing with the temporary arrangements, or selling the affected land to the sub-project at full replacement cost at current market value</li> <li>Provision of assistance to enable the land users owners to restore land to its pre-subproject condition by providing measures to improve land quality in cases where land is adversely affected</li> </ul>	Irrelevant
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights	<ul style="list-style-type: none"> <li>No compensation for land if returned to owner in less than one year.</li> <li>Provide cash compensation equivalent to the replacement cost at market price of renting the land</li> </ul>		Irrelevant

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
			during the temporary use <ul style="list-style-type: none"> <li>Provide cash compensation for loss of crops, trees, or structures at replacement cost</li> </ul>		
Loss of urban residential or commercial non-arable land or access to it	Temporary (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land	<ul style="list-style-type: none"> <li>No compensation for land if returned to owner in less than one year.</li> <li>Provide cash compensation for loss of crops, trees, or structures at replacement cost</li> </ul>	<ul style="list-style-type: none"> <li>Provision of resettlement assistance to landless PAPs with no legal rights</li> </ul>	<b>Irrelevant</b>
<b>Structures or Buildings (Commercial, Business, Industrial, or Residential)</b>					
Loss of structures or access to them	Permanent (complete or partial) loss of structures	Individuals who have formal legal ownership rights to the structures	<ul style="list-style-type: none"> <li>Provide cash compensation at replacement cost which is equal to the market cost of materials used to build a replacement structure of similar area and quality, or to repair a partially affected structure, in addition to the cost of transporting building materials to the construction site, plus the cost of any</li> </ul>	<ul style="list-style-type: none"> <li>A list of available structures in each affected area</li> <li>A list of PAP and entitled persons</li> <li>Consultations and formal agreement with PAPs on type of compensation (cash or in-kind, i.e relocation)</li> </ul>	<b>Irrelevant</b>



Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
			labor and contractors' fees, and the cost of any registration and transfer taxes.		
Loss of structures or access to them	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have formal legal ownership rights to land but have temporary or leasing rights (tenants)	<ul style="list-style-type: none"> <li>Provide assistance in moving and finding similar and affordable rental accommodation (this may include moving allowance and rental allowance for a transitional period).</li> </ul>	<ul style="list-style-type: none"> <li>A 3-months' notice - at least - to be given to the tenants.</li> </ul>	<b>Irrelevant</b>
Loss of structures or access to them	Permanent (complete or partial) loss of urban residential or commercial non-arable land	Individuals who do not have any recognizable legal right or claim to the land (squatters and persons in ownership dispute)	<ul style="list-style-type: none"> <li>Provide cash compensation at replacement cost for the structures if they were built by the users.</li> <li>Provide assistance in moving and finding similar and affordable rental accommodation (this may include moving allowance and rental allowance for a transitional period).</li> </ul>	<ul style="list-style-type: none"> <li>The Environmental and Social Officer may look into the possibilities of formalizing the structures following their repair.</li> </ul>	<b>Irrelevant</b>
<b>Standing Crops, Trees, and Plants</b>					

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who cultivate the land and who have formal legal ownership rights to the land on which the crops are planted	<ul style="list-style-type: none"> <li>Provide cash compensation for loss of crops, trees, or plants at replacement cost.</li> </ul>	<ul style="list-style-type: none"> <li>A comparative list of the prices of agricultural products in local markets.</li> <li>A list of tree and plant species in the area.</li> <li>The sub-project activities should take into consideration the cropping patterns and seasons in order to avoid partial or complete loss if possible.</li> </ul>	Relevant
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who do not have formal legal ownership rights to land on which the crops are planted but have temporary or leasing rights (tenants)	<ul style="list-style-type: none"> <li>Provide cash compensation for loss of crops, trees, or plants at replacement cost.</li> </ul>		Relevant
Loss of standing crops, trees, or plants or access to them	Permanent (complete or partial) loss of standing crops, trees, or plants	Farmers or individuals who do not have any recognizable legal right or claim to the land on which the crops are planted	<ul style="list-style-type: none"> <li>Provide cash compensation for loss of crops, trees, or plants at replacement cost.</li> </ul>		Relevant

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
<b>Income or Access to Income (Commercial, Business, and Industrial Activities)</b>					
Loss of source of income or access to source of income	Permanent loss of income source or access to it	Owner or workers in formal registered businesses	<ul style="list-style-type: none"> <li>Provide transitional cash compensation until new permanent employment is secured based on net income (at least six months are provided if not more).</li> <li>Provide development assistance to PAPs (i.e. training in specific areas) in order to help them to maintain and/or improve their income generation potential and access to gainful employment.</li> </ul>	<ul style="list-style-type: none"> <li>A list of available commercial, industrial, and business activities in each affected area</li> <li>A list of PAP and entitled persons.</li> <li>The Environmental and Social Officer shall assist in the provision of development assistance to severely affected PAPs and vulnerable groups as specific attention should be paid to the needs of the following vulnerable groups, including:</li> </ul>	Irrelevant
Loss of source of income or access to source of income	Permanent loss of income source or access to it	Owner or workers in informal not registered businesses	<ul style="list-style-type: none"> <li>Provide transitional cash compensation until new employment is secured based on minimum wage per month in the respective district (at least six months are provided if not more)</li> <li>Priority shall be given to severely affected PAPs in the provision of any relevant</li> </ul>	<ul style="list-style-type: none"> <li>i) Persons below the poverty line, the landless,</li> <li>ii) Elderly, women and children, indigenous peoples, ethnic minorities,</li> <li>iii) Project affected persons who may not be protected through national land compensation legislation.</li> </ul>	Irrelevant

Type of Losses	Level of Impact	Entitled Person(s)	Compensation Policy & Standards	Implementation Issues	Status Relevant/ Irrelevant
			employment in the activities related to the sub-project.	iv) persons with disabilities	
Loss of source of income or access to source of income	Temporary loss of income source or access to it	Owner or workers in formal registered businesses	<ul style="list-style-type: none"> <li>Provide cash compensation for the duration of business/income generation that is disrupted based on net income.</li> </ul>	The RAPs will include these vulnerable groups and take into consideration their individual circumstances. Subsequently, the provision of development assistance to severely affected PAPs and vulnerable groups will be through design training programs, formalizing informal activities, and access to credit.	Irrelevant
Loss of source of income or access to source of income	Temporary loss of income source or access to it	Owner or workers in informal unregistered businesses	<ul style="list-style-type: none"> <li>Provide cash compensation for the duration of business/income generation that is disrupted based on the minimum wage per month in the respective district.</li> </ul>	<ul style="list-style-type: none"> <li>If the transitional cash compensation 6 month period expires without the PAPs having restored their living standard, then the period could be extended to another 3 months. However, this extension is to be granted on a case-by-case basis. Therefore, it is recommended that an Environmental and Social Officer has to make a case study for each PAP prior to the decision.</li> </ul>	Irrelevant

## 8.2 Valuation Procedures of Crops

### 8.2.1 Crop Valuation

In order to determine the prices of the crops, the study team relied upon the pricing lists provided by the agricultural directorate for the crops and trees. The price lists are developed by the Agriculture Directorate, which is the affiliate Governorate level branch of the Ministry of Agriculture. Prior to developing such lists, the Agriculture Directorate has discussed with the Agriculture Associations within the jurisdiction of the governorate in order to identify the prevailing market price.

**Table 8-2: Prices provided by the agricultural directorate in Dakahlia Governorate, 2017**

Crops	
Type of crop	Price (EGP) Per Kirat (175 m <sup>2</sup> )
Corn	375
Tomato	From 500 to 1050 <sup>23</sup>
Rice	450
Watermelon	415
Trees	
Type of trees	Price (EGP) Per tree
Palm trees	750

Most of the owners/tenants that were consulted about the values of crops and trees indicated that they are satisfied with the crops compensation value. However, they reported that the best timing to give their land is by the end of the agricultural season after harvesting the crops. . Accordingly, EETC is to consider the timing of harvesting and attempt to initiate construction works after this period as a mitigation measure, The Compensation Committee is to prepare a plan for consultation activities for the construction and operation phases in order to ensure community participation.

### 8.2.2 Land Lease for storing construction material

Any land needed for temporary storage of construction material will be compensated at full rent price of uncultivated land determined by the agricultural directorate, and in case the land is cultivated the normal compensation mechanism of crops and tress compensation will be applied. In regards to this project, the implemental company does not need separate lands to store the equipment, as they are stored in either the same lands needed to install the towers and to the wiring process, or in the road reserve after coordination with the local units and the agricultural association.

<sup>23</sup>The price of tomato depends on the agricultural season

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### 8.3 Arrangement for delivering of compensations

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The temporary land acquisition and compensation will be applied as follows:

1. The Design Department in EETC has provided a detailed map on land acquisition scope in order to identify the land acquisition area. That map showed the sites of the towers` (see Annex II)
2. The EETC sends to the agricultural associations located along the route of each OHTL the number, and the location of the towers in order to determine the ownership of lands where the towers will be constructed,
3. The agricultural association coordinated between the EETC and the PAPs,
4. The EETC make a survey to the OHTL route and negotiates with the land owner to let them install the towers. The PAP has the full right to refuse the construction of the towers. The EETC cannot enter the owner land and install the towers if he refuses, so it tries to persuade the owner and give him a fair compensation ( see Annex III)
5. The PAPs were consulted during the preparation of the RAP in order to provide them with the required information regarding their rights, valuation procedures and grievances and redress mechanism.
6. Final assessment by EETC team to evaluate the needed lands in cooperation with the Agricultural Associations.
7. After receiving the approval from the EIB on the RAP, the Compensation Committee will start the compensation procedures.
8. A continuous dialogue will be applied with the PAPs as part of stakeholder engagement activities.
9. A list of owners/tenants and type of loss will be disclosed in the Local Governmental Units and the agriculture Associations.
10. A formal agreement will be written with each PAP, upon which, the compensation is paid to him/ her and EETC will receive the land from him/her to start the construction. Two formal agreements conducted with the PAP to determine the compensation value, one before starting the construction phase, while the another before starting the operation phase in order to take into consideration the rights of PAP if the crops or trees price is changed by the change of the agricultural season.
11. The value of compensation of the potential affected crops/trees will be defined and forwarded to the financial department in the EETC.
12. The financial department will release the compensation amount.
13. Complete legal procedures for land acquisition will be documented by the Social Development Officers within the Delta Zone in Dakahlia Governorate and copies will be sent to the Social Development Officer in the EETC headquarter in Cairo.



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## 8.4 Transitional support

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Due to the nature of impacts which are mainly impacts on crops and trees, there will be no transitional support activities. There will be no moving costs, temporary living allowance and payment of fees since there will be no physical resettlement of the PAPs.

## 8.5 Arrangements for recalculation of compensation in case of prolonged delay in delivery of compensation

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In case of any prolonged delay related to the project implementation the following procedures will be applied:

- 1- Delta zone will send a letter to the Agriculture Directorate in order to get the updated crops and trees price lists. This will be during the re-measuring process
- 2- The Compensation Committee will inform the PAPs about the change of the prices. They should sign a new agreement that reflects their approval on the new value of compensation re-calculation
- 3- The value of compensation of the potential affected crops/trees will be defined and forwarded to the financial department in the EETC.
- 4- The financial department will release the compensation amount from the budget item allocated for compensation and requested early by the project manager.
- 5- The Compensation Committee will disburse the compensation value according to the previous conditions of payment reported in section 8.2.
- 6- All updated lists, agreement and money disbursement will be documented by EETC compensation committee.

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## 8.6 Income and Livelihood Rehabilitation Measures

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For this project, PAPs are only eligible for compensation for crops as identified in chapter 6. The project will not result in the type of livelihoods damage that will require livelihoods rehabilitation measures. No other impacts are anticipated that requires additional assistance or compensation.

### 8.6.1 Discussion of measures of Livelihood and Income Rehabilitation Measures

The following types of compensation are considered:

- **Arrangements (in addition to compensation) providing sufficient opportunity for those losing land to improve or at least restore incomes**

Not Applicable – Only compensation for crops for one agricultural season is considered.

- **Arrangements, timing and availability for replacement housing, including site preparation and access to facilities and services as needed to improve, or at least restore, living standards**

Not Applicable

- Relocation or other arrangements necessary for shops and enterprises to resume profitable operation

Not Applicable

- Arrangements (e.g. alternative employment, temporary wage support, other) necessary to maintain or restore incomes of workers in affected enterprises

Not Applicable

- Relocation Assistance to renters or leaseholders losing access to land or structures

Not Applicable

- Special Assistance to be provided to vulnerable groups (e.g., the poor and the elderly and disabled)

Not Applicable

- Restoration or replacement of community infrastructure and services

Not Applicable

## 9 CHAPTER NINE: Institutional Arrangements

This section identifies organizations and/or agencies primarily responsible for the compensations and the Grievance and Redress Mechanism (GRM)

### 9.1 Institutional Responsibilities For The RAP Implementation

The organizational setup responsible for compensation activities and Redress Mechanism (GRM) under this project are:

1. Head of Projects Sector (Head of committee),
2. Director General of Civil Administration,
3. Director General of projects' OHTLs,
4. The Engineer responsible for civil works,
5. The Engineer responsible for projects' OHTLs,
6. The Financial member,
7. The Legal member, and
8. Compensation Coordinators for Delta Region (they are responsible for coordination between the agricultural associations and the PAPs).

The PAPs can communicate directly with the coordinators and the project manager as the communication with the PAPs is within their responsibilities.

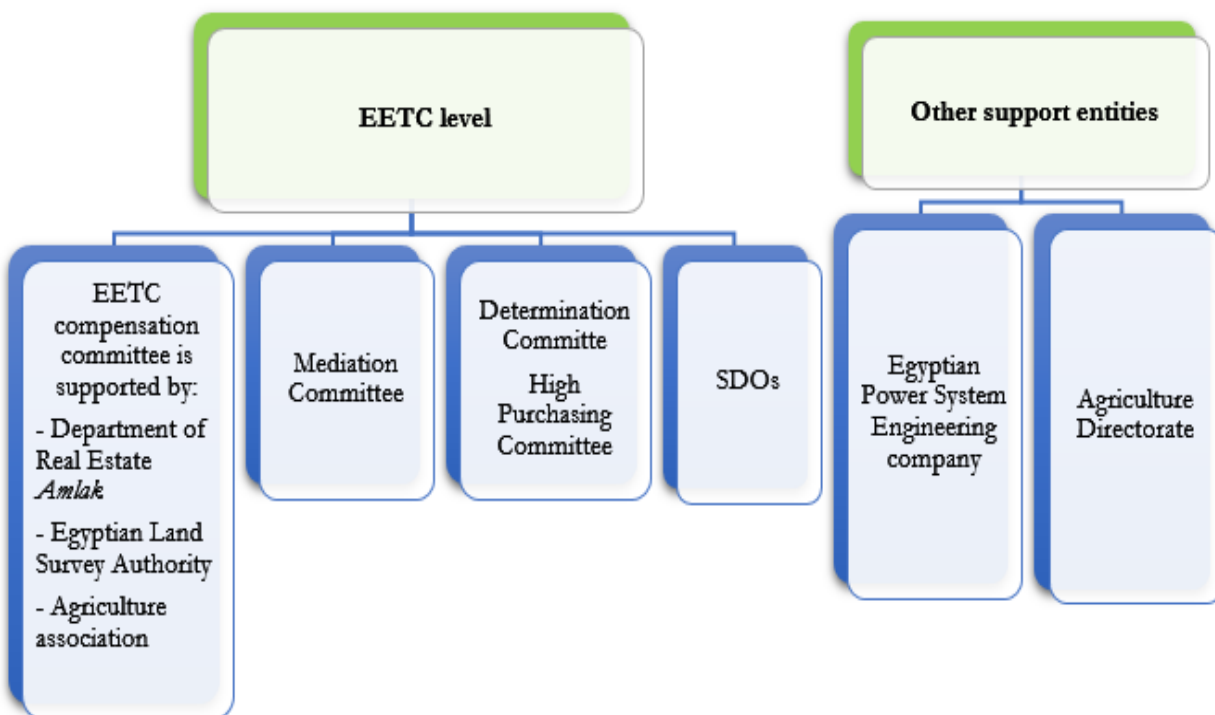


Figure 9-1: Institutional Scheme

## 9.2 Institutional roles in EETC compensation system

The following table presents the roles of different institutions in the compensation system at EETC:

**Table 9-1: Institutional roles in the EETC compensation system**

Stakeholder	Institutional Role
<b>Ministry of Electricity</b>	According to law 10/1990, the Minister of Electricity will issue the expropriation decree for the project
<b>Ministry of Agriculture</b>	According to law 10/1990, the Minister of Agriculture approves the expropriation decree for cultivated lands
<b>Agricultural Directorate</b>	Identifies concerned associations according to the project maps Provides the price list for the crops and trees at the governorate
<b>Agricultural Associations</b>	Provide the names and tenures of the PAPs within their relevant areas Participate in the census survey of the PAPs prior to starting of the expropriation activities as part of the compensation committee Participate in the compensation committee to provide technical opinion about the crops (age of trees, fertility of land ... etc.)
<b>EETC Compensation Committee</b>	Is responsible for the verifying the census survey of the PAPs prior to implementation Is responsible for implementation the compensation activities according to the standards and procedures stipulated in the RAP Communicate with the governorate and the Agricultural Directorates for expropriation decree and valuation of crops Pay the compensation amounts to the PAPs
<b>EETC Mediation Committee</b>	Is responsible for handling the second tier of grievances
<b>EETC Social Development Officers (SDOs)</b>	A key player to ensure diligent implementation of the RAP and ongoing consultation with the PAPs Works in both compensation and mediation committees Is responsible for handling the first tier of grievances along with the Site Project Manager as well as conducting awareness raising activities among PAPs to inform them about the grievance mechanism Responsible for monitoring the progress of the RAP implementation Work with the EETC team to ensure that land is restored to the same conditions as before the OHTL installation. Conducting further consultations during the implementation and monitoring of the RAP (including affected persons of vulnerable groups such as women and poor people)

	Ensure that the willing buyer-willing seller approach process was applied to meet the key principles and that the land owners and users had the right to refuse to sell their land and that involuntary land expropriation was not an option to resort to when the process is defined as “willing buyer willing seller”.
<b>Site Project Manager</b>	Is responsible for supervising the construction activities Is considered the first tier of grievances
<b>EETC Environment and Social Department</b>	Will monitor the implementation of the RAP process during all its phases. Submit regular monitoring reports on the RAP implementation to the EIB. Keep record of the received grievance and the taken steps to resolve

### 9.3 Implementation Timetable

#### 9.3.1 Implementation Sequence

The compensation process is governed by a clear detailed legal framework that enabled compensation committee to perform their work appropriately. In addition, the legal frame is in compliance with the standards of EIB.

Temporary land acquisition and compensation will be completed in coordination with relevant organizations and as per the principles of the prepared RAP. The specific process is as follows:

- Prior to the RAP preparation, the project design department in EETC provides a detailed map on land acquisition scope to identify the land acquisition scope and area.
- Agricultural Directorate provides the prices for the different types of crops.
- Compensation committee initially calculates the needed areas in cooperation with the Agricultural Associations,
- Approval from the EIB on the RAP
- Prior to the implementation of the RAP, verifying the situation on the ground and checking if any changes (compared to the census survey baseline) happen, document the change, assess the implication and inform the Bank
- Delivery of compensation amount to the PAPs.
- Complete legal procedures for land acquisition

#### 9.3.2 Time Schedule and the Cut-off Date

The potential date for the start of the construction is September 2019 which is considered the cut-off date<sup>24</sup>. Construction activities for the OHTLs will start after completing the compensation activities. Significantly, most of the owners/tenants that were consulted about the values of crops and trees indicated that the best timing to give their land to EETC is by the end of the agricultural season after the harvest of crops. Accordingly, EETC is to consider the timing of harvesting and attempt to

<sup>24</sup> The cut-off date was communicated to PAPs during the consultation activities and field work.

initiate construction works after this period as a mitigation measure. The Compensation Committee is to coordinate with:

- Heads of agricultural associations to provide information to the compensation committee about the agricultural seasons in the project area
- Owners and tenants, and disclose information to them in order to put this measure into effect and ensure community participation.

It is important to note that the project schedule will start with a cut-off date, after approval from the EIB. At this stage, EETC made a preliminary cost estimate for the project affected lands. The determinants of this estimate were:

- land size
- Type of crop or tree
- The prices mentioned by the Agricultural Directorates



Table 9-2: Tentative Time Plan

Activities	1-Sep	1-Oct	1-Nov	1-Dec	1-Jan	1-Feb	1-Mar	1-Apr	1-May	1-Jun	1-Jul	1-Aug	1-Sep	1-Oct	1-Nov	1-Dec	1-Jan	1-Feb	1-Mar	1-Apr	1-May	1-Jun
<i>RAP approval</i>																						
a-1 EIB approval																						
a-2 EETC approval																						
<i>During The preparation phase</i>																						
b-1 Consulting with the governorate																						
b-2 Formation of EETC compensation Committee																						
b-3 Agriculture directorate developed the price lists of crops and trees																						
b-4 Formation of the GRM Committee																						
b-5 Consultation with the PAPs																						
b-6 Capacity building to the EETC SDOs																						
b-7 Preparation of the project profile (exact locations and types of towers are identified)																						
b-8 Verification of RAP and addendum																						
<i>During the resettlement implementation</i>																						
c-1 Consultation with the PAPs																						
c-2 Disbursing payment to the PAPs																						
c-3 Documentation of the compensation activities																						
c-4 Documentation of the Grievances recipients and responses																						
c-5 Documentation of operation and efficiency assessment of the RAP																						
c-6 Pre-measuring of the affected plots of lands and assets																						
c-7 Disbursing money to the PAPs																						
c-8 Document the pre-measuring process																						
<i>During Monitoring and evaluation</i>																						
d-1 Quarterly reports to be developed																						
d-2 Evaluation Activities Mid-term evaluation Final impact																						

## 10 CHAPTER TEN: Budget and Funding Arrangements

This section includes a budget breakdown estimating all resettlement-related costs, including an allocation for contingencies. It also establishes financial responsibility for meeting resettlement commitments, and describes funding flow arrangements.

### 10.1 Estimated budget

The compensations are calculated according to:

- **Compensation for crops/Trees:**
  - The prices of the crops and the trees<sup>25</sup> located in the lands where the towers will be constructed.
  - The agricultural seasons during the construction and the operation phases.
  - The total affected agriculture lands<sup>26</sup> during the construction and the operation phases,
  - The documents of the survey that was conducted by the EETC in coordination with the agricultural directorates and associations,
  - The location of the land from the main roads<sup>27</sup>
- **Compensation for land:**
  - The total area needed for a tower is in average 7 x 7 m, depending on the voltage level of each line to which the towers belong (i.e. for 66kV it is 5 x 5 m, for 220kV it is 7 x 7 m and for 500kV it is 8 x 8 m). EETC will compensate PAPs for the entire area underneath the tower, even though it is acknowledged that some limited economic activity may continue after the completion of the works and that according to Electricity Law No 63 of year 1974 this action is not considered to be or does not entail land acquisition
  - Compensation for land is calculated according to the area of the tower x Number of towers and the market price of the land. Given that, the total area needed for the 220kV tower is 49 m<sup>2</sup>, and the total number of towers in the two OHTLs is 32. Therefore, the total affected area will be 49x 32= 1568 m<sup>2</sup>
- **Compensation for income losses:** Loss of income is associated with the loss of agricultural crops during the planting season; therefore, compensation for agricultural crops and trees is compensated for loss of income because income is linked to the income from the sale of agricultural crops. EETC compensate the owner and the tenant.

Following is a table with the estimated amounts of money necessary for compensating PAPs for their affected crops and trees in both the construction and operation phases.

The estimated budget is about 5,106,171 EGP.

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<sup>25</sup> The crops and trees prices are presented in table 8.1

<sup>26</sup> The area of affected lands is presented in table 2.1

<sup>27</sup> The lands near to the main road have a high price than the lands away from it, since some of the farmers may build a residential building on their lands and the presence of the towers will prevent them from that, therefore, they need a high compensation value.

**Table 10-1: Calculation of the compensation amount for crops**

OHTL	Crops	Trees	Land	RAP Management Cost	Total price
<b>New Gamasa SS \ West Damietta power OHTL</b>	3,104,521 (EGP)	943,250 (EGP)	84,000 (EGP)	8,000 (EGP)	4,139,771 (EGP)
<b>New Gamasa SS \ Tiba Steel OHTL</b>	934,400 (EGP)	-	40,000 (EGP)	4,000 (EGP)	978,400 (EGP)
<b>Total Price</b>	<b>4,038,921</b> (EGP)	<b>943,250</b> (EGP)	<b>124,000</b> (EGP)	<b>12,000</b> (EGP)	<b>5,118,171</b> (EGP)

## 10.2 Fund Flow and Payment Plan

The EETC go through the following process before processing payments

1. The project manager prepares an estimated budget for the whole project activities, including compensations, this budget is passed on to the Financial Department at EETC in order to make the payment. (After the finalization of bidding procedures)
2. The Determination Committee of the EETC approves the budget prior to the construction activities (at least five months)
3. The Financial department requests a certain amount of money based on preliminary estimates provided by project engineers. (at least four months before the construction)
4. The compensation value will be transferred to the EETC financial department (at least three months before the construction)
5. The Compensation Committee begin the census survey and calculate the needed compensations accordingly. They send the inventory lists, supported by the ID of the owner/tenants and his ownership or tenancy status, to the Determination Committee which is responsible for approving the inventory. Thereafter they request the Financial Department to prepare the cheques. (at least one month before the construction)
6. The financial department prepares the cheques in advance, at least two weeks before paying the compensation
7. The entire amount of compensation should be paid to the owners/tenants prior to the construction.

## 11 CHAPTER ELEVEN: Consultation Activities and Disclosure

This chapter aims to highlight the key consultation and community engagement activities and their outcomes that were conducted in relation to the land acquisition and mitigation of resettlement impacts, in addition to outlining the key aspects that were addressed when holding the consultation activities.

Consultation activities (census survey, scoping, interviews, and focus group discussions) with various stakeholders and community people in the villages located in the project area which includes; Umm El Rida village, El Rakabih village, and Gamasa El Baled village. The consultation activities including the affected persons were held for the proposed project area in compliance with relevant EIB and Egyptian legislations.

### 11.1 Consultation Activities

Consultation has been carried out in the form of a continuous process that started before the start of preparation of RAP and ESIA and has continued during preparation of the RAP study. EETC has applied multi-levels of consultation with the stakeholder and the PAPs during preparation of the RAP. The consultation process is expected to be continued by EETC during various stages.

The various consultation activities took place in the presence of:

- The Project Manager Eng. Gamal Gbre (EETC)
- The heads of the agricultural associations:
  - El Jihad agricultural association: Eng. Shahat Attar
  - El Rakabia agricultural association: Eng. Hafnawi Abdul Rahman Hafnawi
  - Gamasa agricultural association: Eng. Hamed Mustafa El Sayed

Following are the main objectives of the consultation activities held:

- Collecting information related to the socio-economic profile of the PAPs
- Sharing information about the compensation approach including compensation values and the calculation methods with the PAPs
- Consulting the PAPs about the draft findings of the ESIA and RAP studies
- Meaningful consultation and disclosure which will be based on the disclosure of information relevant project activities, and will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders.
- Grievance mechanism by which the general public and other stakeholders can raise concerns, which the Company will handle in a prompt and consistent manner.

The following figure illustrates the methodology used for consultation throughout the project:

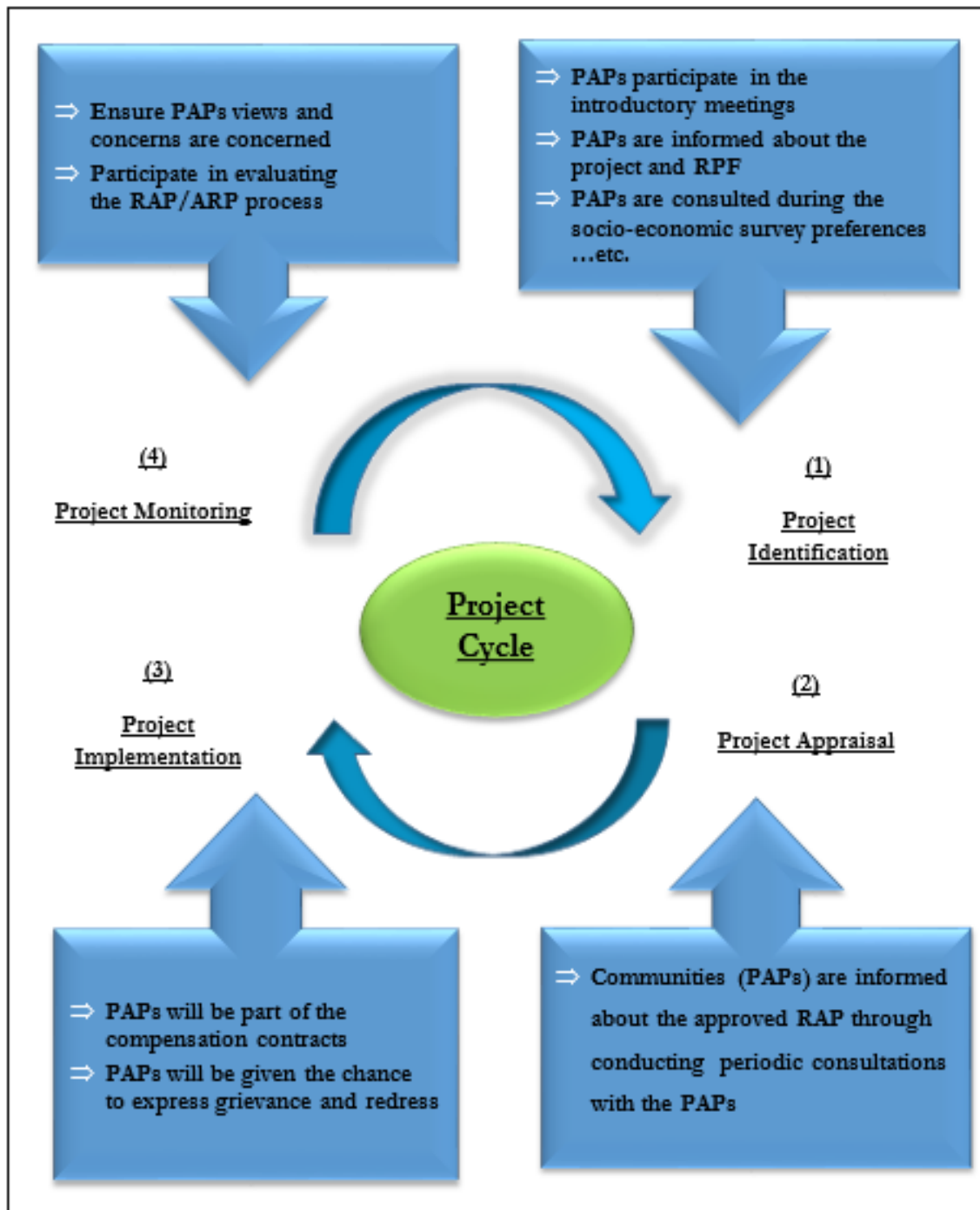


Figure 11-1: Consultation with PAPs along the Life of the Project

The following table shows the detailed consultation activities held during preparation of the RAP:

**Table 11-1: Summary of the conducted consultation activities**

Consultation approaches	Data collection tools	Number of consultations	Time and location	Number of people consulted (Table/male and female)	Main topics covered
Census Survey during the RAP preparation	Census survey sheet		April – June 2018 Gamsa	243 All crop holders and some members of their families	Census of the affected persons and the scope of land acquisition conducted by EETC.
Interviews with PAPs	Questionnaire	126 interviews	April – June 2018 Gamsa	126 persons (PAPs) All crop holders	Identification of impacts of land acquisition.  Collecting information related to the  Socio-economic profile of the affected persons.  Discuss the impacts of land acquisition and compensation methodology.
FDGs	FGD guideline	12 sessions	April – June 2018 Gamsa	84 PAPs	Discussion of project impacts including socio-economic and resettlement impacts
Stakeholders semi structured interviews	Interview sheets	15 interviews	April – June 2018 Dakahlia Governorate Gamsa City	15 persons	Discussing the roles of stakeholders in the RAP process  Including interviews with agricultural associations, the agricultural directorate, and compensation committee to discuss the compensation approach and valuation methodology

## 11.2 Consultation Activities during Site Investigations

Prior to the planning phase, EETC teams paid several visits to the project site in order to consult with the local community. The main objective of these visits was to introduce the project to the governmental entities and community people. During these visits, all the concerns and comments received from the governorates and the directorates (health, environment, etc..) are considered during the planning of the project. Those visits also helped in determining the route of the lines.

## 11.3 Consultation Activities during Preparation of the ESIA and RAP studies

- During the preparation of the SS ESIA, community groups were consulted through the focus group discussions (FGDs), stakeholder interviews and scoping meetings conducted along the route (See Annex IV PAPs Names of Participants in the Consultation Activities). In addition, individual interviews were conducted with the potential affected persons in their fields. The farmers interviewed noted that they have witnessed other Electricity line projects. Concerns were

raised about the possibility of building on the land after construction of the OHTL. This is an important issue given the huge illegal expansion of construction over agricultural land<sup>28</sup>.

- During the preparation of the ESIA and the RAP, The study team conducted several consultations activities with all stakeholders in the project area; this includes potential PAPs whose lands lay over the route of the transmission lines. The consultation activities involved a combination of one-on-one interviews and focus group discussions. It was important to combine these different consultation methods in order to identify the PAPs' concerns and overall stance towards the projection. Comments raised by participants were considered. Temporary land acquisition was raised as an important theme including questions about the compensation value. All crop holders and some members of their families (PAPs) participated in those Consultation activities. Consultations events were mainly held through the agricultural Association.
- Preparation of the RAP for these transmission lines mainly involved engaging with the area where agricultural activities occur (about 14 kms).
- The study team prepared a community based consultation strategy in order to cover the all of the cultivated areas. It was relatively multi-level process which.

Photos removed by EIB for personal data protection

**Figure 11-2: Photo interviews with project stakeholders**

<sup>28</sup> EETC ensures that the selected land is agricultural and will not be turned to urban within the coming 10-15 years. Farmers in this issue are aiming to illegally build on the land as a status quo, while this land is officially declared agricultural land with no near future plans to be urbanized.



Photos removed by EIB to protect personal data

**Figure 11-3: Photo FGDs with PAPs**

The project team ensured to disseminate the following information to the participants during the meetings:

- 1- The project objectives and justification
- 2- Potential impacts
- 3- Compensation strategy and mitigation measures
- 4- Entitlement categories
- 5- Grievances mechanism

### 11.3.1 Comments and concerns raised during the RAP preparation

**Table 11-2: Key comments and concerns that raised during the Consultation activities (RAP preparation)**

Topic	Concern/question	Response of EETC representative
<b>About the project and exact location of the project</b>	Where will the OHTL pass?	<p>The OHTL originates from new Gamasa SS heading Damietta power plant. The OHTL is of 10.5 km total distance where 32 electric towers are to be established, among which 24 towers are located in Damietta Governorate, while 8 towers are located in Dakahlia Governorate.</p> <p>The OHTL originates from new Gamasa SS heading TIBA Steel. The OHTL is of 3.5 km total distance where 12 electric towers are to be established. All of the OHTL passes in Dakahlia Governorate.</p>
	What is the Right of Way?	<p>Relevant laws and guidelines require maintaining a suitable Right of Way (RoW) distance in order to maintain safety of the general public and minimize exposure to Electromagnetic Fields (EMFs). Thus, the EMFs would effectively attenuate at the edge of this RoW.</p> <p>According to the Electricity Law No.63 of year 1974, the RoW will constitute 25 m at each of the two sides of the transmission line which represent, also, the protection zone along the line route.</p>
<b>About the project and land avoidance mechanism</b>	How much land you will need?	EETC use various models and types of towers. The area of the basement of 220 kv towers varies between 8 X 8 m to 12 X12 m.
	What would happen if the project affected more than this plot of land?	We will re-measure the affected lands after the construction and you will receive a full amount of money. You will attend the measuring process and the re-measuring. As well a representative from the governorate, local governmental unit and the Agriculture Association in order ensure that you will be fairly compensated.
	Can the project avoid my lands?	<p>As a matter of fact, EETC will not step into any of your lands without your approval. The project avoids privately owned lands, trees and structures As much as possible.</p> <p>If the land is cultivated by crop, we will damage the</p>

Topic	Concern/question	Response of EETC representative
		crops, as well, you will receive your compensation
<b>Impacts on the lands</b>	Can we build on the land later after the construction?	No it will not be possible to build on the land after installing the OHTL. There is the law of RoW.
	Are we allowed to plant any types of trees later?	No it will not be possible to plant trees with extending Height not more than 7 m.
	Will there be permanent impacts on land productivity?	No it will only be affected during the construction phase. The land should return to its original productivity after that.
<b>About compensation mechanism</b>	How do you value the crops, trees?	EETC receives a price list from the Agriculture Directorate. That list is updated annually. For example, the compensation of a palm tree is about 750 EGP. EETC will consult with you prior to the implementation about the prices in order to make sure that the prices are fair and based on the real market price.
	Who will pay for us the compensation?  How can we trust those who will pay compensation?	EETC will set up a compensation committee consisting of about 8 persons, The Committee is responsible for the work of all compensation procedures. Eng. Gamal Gbre(Project manager) will be a member of the Compensation Committee.  The compensation will be paid in fair value based on the current market price we don't want to do harm to the community.
<b>Who will benefit from the project</b>	We will host the project, therefore, we should be the main beneficiaries from the produced electricity	The industrial zone of Gamsa and Damietta Power Plant is the main beneficiary of the project. There are future projects for development in Gamasa city in order to support and develop the extension of the existing industrial area. This area is located on the borders of Gamasa city. It includes all food, chemical, metal, electrical, mining, light industry, textile and garment industries. The number of producing factories is (58 factories) and the number of workers in the producing factories is (2454 workers). The number of factories and industrial projects under construction is (76 factories), and the number of workers in factories and projects under construction is (2662 workers).  The project will result in a number of positive impacts such as: <ul style="list-style-type: none"> <li>○ Increase industrial development in the region</li> <li>○ Provide job opportunities for all those who can</li> </ul>

Topic	Concern/question	Response of EETC representative
		<p>work, especially youth,</p> <ul style="list-style-type: none"> <li>○ Increase the production,</li> <li>○ Help in opening many restaurants, especially as there is lot of laborers in Gamasa city,</li> </ul> <p>The produced electricity will go to the National Grid. All of Egypt will benefit from the project.</p>
<b>Information about the project</b>	What if we need further information?	You are most welcome to contact Eng. Gamal Gabr (Project manager) and the Delta Electricity Zone to get the needed information. In addition, you can contact the EETC itself. If you have access to the internet, all information about the project is on the website( <a href="http://www.moe.gov.eg/test_new/home.aspx">http://www.moe.gov.eg/test_new/home.aspx</a> )

#### 11.4 Further Planned Consultation activities

- Prior to construction, EETC Compensation committee team has sent letters to the governorates to inform them about the procedures of the compensation and the establishment of the compensation committees.
- After sending the letters, different meetings were conducted with the governorate and the Agriculture Directorate. The Agricultural Directorate coordinates with EETC compensation committee team the valuation of the compensation according to the market prices and after consulting farmers from the area.
- Consultation activities have already started with the PAPs accordingly in order to inform them about the compensation values and procedures.
- Specific and differentiated efforts will be made to reach out to women in particular during the upcoming consultations on the Implementation of the RAP (which will be documented by the SDOs).
- EETC's general practice is usually to conduct several meetings with the PAPs at the project affected areas in order to inform the PAPs of the compensation procedures and avoid any problems.

#### 11.5 Disclosure of the RAP

##### 11.5.1 Information Disclosure during Preparation Phase

The project, in compliance with the requirements of Law 10/1990, paid more attention to the disclosure of all information related to the project activities and potential impacts:

- During the ESIA and RAP preparation all information related to the project including compensation and resettlement, will be presented in the website of the following entities:
  - EETC website ([http://www.moe.gov.eg/test\\_new/home.aspx](http://www.moe.gov.eg/test_new/home.aspx))
  - EcoConServ website
  - The non-technical summary and the Final ESIA and RAP reports, will be uploaded to the websites
- Meetings were conducted in the locations of land that will be expropriated. EETC team disclosed all needed information to relevant stakeholders. They provided the needed

information transparently and sufficiently. The team was open to receive questions and responded to it during conducted meeting.

- During the RAP data collection process, the Social Development Officer from EETC and the agriculture Association representatives as well as the consultant disclosed all needed information to the farmers and the PAPs. Information provided covered the following topics:
  - Land requirements for temporary expropriation
  - Potential impacts on the lands and assets
  - The valuation strategy
  - Grievance channels
  - Project time schedule

### ***11.5.2 RAP Disclosure***

The document should be translated into Arabic. EETC should disclose the Arabic and the English RAP on EETC website as well as other locally appropriate locations (e.g. at local NGOs, at the agriculture directorates...etc.). Upon the finalization of the local disclosure by EETC, they send a letter to the Bank authorizing the disclosure on the Bank Info Shop.

### ***11.5.3 Information Disclosure during Implementation Phase***

- Landowners will be informed about the implementation schedule. They will be notified by the Agriculture Association and EETC compensation Committee. The notification memo should be provided to them **in a written form (in addition to a verbal form)** as the majority of head of households are illiterate. All process should be documented and reported to the Bank in order to verify the implementation.
- Disclosure of information in the religious places (church/ mosque) might be useful to the project. Based on different studies implemented in the rural areas, advertising through religious places is one of the most practical strategies to disclose information.
- Disclosure of information in the local governmental units and the Agricultural Association (the Arabic RAP should be available at those local locations).

In addition to the above-mentioned strategies, all information about the PAPs and how they will be affected is already included during the individual meetings conducted during the census.

## 12 CHAPTER TWELFTH: Grievance Mechanism

Grievances and Redress represent one of the important processes that should be tackled carefully during the project implementation. Grievance system is also important for EETC to ensure that complaints are properly handled without delay that may negatively affect the project. Moreover, to ensure that information is shared transparently and that they are accountable to the hosting communities.

The EETC adopted a comprehensive grievance mechanism. Prior to the RAP implementation a grievance leaflet was developed by the EETC to be distributed to the PAPs prior to the RAP implementation. Thus, sufficient and appropriate information about the GRM will be shared with the communities prior to the construction phase

The following procedures will be applied in order to have a clear grievance's activities:

### 12.1 Institutional Responsibility for Grievances

EETC Compensation Committee and Social Development Officers (SDOs) in cooperation with the agriculture Association, and the project manager will address all grievances raised by community people, particularly the ones related to resettlement activities.

The main tasks of the Social Development Officer are:

- 1- Raise awareness about the grievances mechanisms among the PAPs
- 2- Collect the grievances received from different channel
- 3- Document received grievances
- 4- Direct the grievance to the responsible department to address the grievance
- 5- Follow up on the resolution
- 6- Document, report and disseminate outcomes of the grievances
- 7- Monitoring of grievances activities

### 12.2 Grievance Tiers

The proposed mechanism is built on two tiers of grievances:

**First tier of Grievances:** Project Manager (on Site) Eng. Gamal Gbre (01009867583)

The Project Manager for each site / SDOs is responsible to ensure that the GRM system is widely advertised and well explained on the local level. Moreover, s/he will follow up on the complaint until a resolution is reached. The turnaround time for the response/resolution should be 15 (maximum) days and The SDOs should inform the complainant of the outcome of the grievance.

It is worth noting that most of the previous experience of EETC is suggesting that complaints are usually handled efficiently and resolved on the local level. In case the PAP is not satisfied with the resolution, the complainant shall submit the grievance to the second level of grievance.

**Second tier of Grievances:** On the level of EETC headquarter (Mediation Committee)

If the aggrieved person is not satisfied with the decision of the first tier, he can raise the complaint to the Mediation Committee at EETC headquarter. The Mediation committee should ensure a resolution is made within 15 days.

The above mentioned tiers are consistent with the EIB policy providing multi-levels of tiers will result in amicable resolution of potential issues or complaints. It is a function of the project, to provide aggrieved people with an avenue for amicable settlement without necessarily pursuing a court case. The absence of first tier mechanism denies project affected groups the direct channel for grievance and delays resolution of disputes against the interest of both the PAP and the project.

If the grievance mechanism is exhausted and the claim/complaint is not resolved, the submitting party would be able to raise their complaint to court.

### 12.3 Grievance Channels

Due to the diversity of the context in different Governorates and the socioeconomic characteristics of the beneficiaries, the communication channels to receive grievances were locally tailored to address all petitioners concerns and complaints. The following are the main channels through which grievances will be received:

1. Project Manager (on Site) acts as the main channel for receiving complaints. He is available on the location. Most of the complaints raised to him/her are raised verbal. He should document all received grievances in written form, giving each grievance a serial number.
2. Hotline: 121 is the hotline in EETC
3. SMS number 91121
4. EETC Website ([http://www.moe.gov.eg/test\\_new/home.aspx](http://www.moe.gov.eg/test_new/home.aspx)) for literate persons who have access to the internet
5. EETC Compensation Committee and Mediation Committee

It is also important to note that local community leaders and NGOs/CDAs can be used to raise awareness among the local community to refer any complaints to the Project Manager or the Social Development Officers. Regular meetings with community members including influential stakeholders can also raise awareness about the grievance channels. (See Annex VI Grievances and Redress Mechanism Sample)

### 12.4 Response to grievances

Response to grievance will be through the following channels

- The same channel the complaint was submitted.
- Response to grievances should be handled in timely manner (according the duration indicated for each tier), thereby conveying a genuine interest in and understanding of the worries put forward by the community.
- EETC should keep a record of complaints and results.

### 12.5 Monitoring of grievances

All grievance activities should be monitored in order to verify the process. The following indicators should guide the monitoring process:

- Number of received grievances per month (Channel, gender, age, basic economic status of the complainants should be included)



- Type of grievance received (according to the topic of the complaint)
- Number of grievances solved
- Level of satisfaction with grievance resolutions
- Documentation efficiency
- Dissemination activities done
- Efficiency of response to grievance provided ( efficiency in time and action taken)

**A Grievance Monitoring Report should be developed on a Semi-annually (6 months) basis in order to keep track of all grievances developed. The report should be developed by the SDO in the EETC headquarter**

All grievances received shall be documented in a grievance register. The following table represents the main contents of such form:

**Box 2: Grievance Form**

Grievance Form
<p><b>Serial Number:</b></p> <p><b>Date:</b></p> <p><b>Name:</b></p> <p><b>Gender of the aggrieved person</b></p> <p><b>Age of the aggrieved person</b></p> <p><b>Education of the person reporting a grievance</b></p> <p><b>Topic of grievance</b></p> <p><b>Actions to be taken (short term- long term)</b></p> <p><b>The referral of grievance</b></p> <p><b>Monitoring for grievance</b></p>

## 13 CHAPTER THIRTEEN: Monitoring Arrangements

This section briefly describes arrangements for monitoring implementation, for external monitoring to be conducted by an independent consulting firm. The scope and frequency of monitoring activities will be described.

### 13.1 Scope of monitoring

**Monitoring aims at tracking project implementation procedures.** It will address the following aspects:

- Follow up on the activities assigned under the RAP (valuation, awareness raising events, disclosure, dissemination activities)
- Follow-up on the status of the project affected persons
- Follow up on the process of grievances in order to identify the efficiency of livelihood restoration: agriculture, business
- Provision of all data needed to apply the mid-term evaluation and final assessment

**The evaluation should ensure that policies have been complied with in addition to providing the needed feedback for adjusting strategic directions.** The evaluation has the following specific objectives:

- General assessment of the compliance of the implementation of resettlement activities with objectives and methods as set out in this RAP,
- Assessment of the compliance of the implementation of resettlement activities with laws, regulations and safeguard policies as stated above,
- Assessment of resettlement and relocation procedures as they have been implemented,
- Evaluation of the impact of the resettlement and relocation programs on incomes and standard of living, with focus on the “no worse-off if not better-off” requirement,
- Identification of actions to take as part of the on-going monitoring to improve the positive impacts of the program and mitigate its possible negative impacts, if any.

#### 13.1.1 Frequency of monitoring

The follow up activities will be conducted along the life of the project. With regards to the reporting frequency, following is proposed reporting system:

- 1 A site visit report should be prepared for the EETC headquarters after each site visit
- 2 A monthly report will be prepared for the following activities:
  - a. Grievances received
  - b. PAPs compensation received
  - c. PAPs compensation not received
  - d. Consultation activities implemented
  - e. Information needed
- 3 A quarterly report will be prepared for the EIB

## 13.2 External monitoring and evaluation

### 13.2.1 Independent consultation firm

The EETC develops in cooperation with the RAP consultant a detailed list of indicators as the RAP will be the baseline study for the project affected people. Halfway through the RAP process, an independent consulting firm will be contracted by EETC in order to apply a rapid assessment for the activities done under the RAP, as well as, the impact of involuntary resettlement on the livelihood of community people.

This assessment aims at providing the guidance for the EETC in case of facing any obstacles that might affect the implementation of the RAP. Following are the proposed external monitoring activities:

- A. Approximately 6 months after the commencement of the construction,** an independent consultant firm will be hired in order to evaluate the resettlement activities, and shed light on the surplus impacts. **A mid-term evaluation should be developed and submitted to the EIB**
- B. By the end of the construction phase** an independent consultant firm will be hired to evaluate the whole process of the RAP, in addition to providing a full assessment for the activities done, including documentation, grievances mechanism, valuation, entitlement and the lessons learned. **A final impact report will be prepared and submitted to the EIB**

Following are some of the suggested indicators to be measured during the monitoring and evaluation process:

#### Box 3: Proposed indicators needed for monitoring activities during RAP implementation

##### Examples of proposed indicators during RAP implementation

Quantitative and qualitative indicators

1. Number of persons compensated for a) crops, b) trees, etc.
2. Number of persons not yet compensated (by types of losses)
3. Number of consultations held
  - Number of participants (According to the communication channel)
  - Gender of participants
  - Age of participants
  - Occupation of participants
  - Their comments
4. Number of complaints received ( by types)
  - Number of complainants
  - Gender of complainants
  - Main complains raised
  - Number of solved complains
  - Number of complains left unsolved (reasons should be reported)
5. Number of grievances resolved
6. Number of grievances outstanding
7. Level of satisfaction of affected people with the compensation
8. Number of awareness sessions held

**Box 4: Proposed indicators needed for monitoring activities during Post-implementation evaluation****Examples of proposed indicators during Post-implementation evaluation**

1. Total Number of persons compensated for a) crops b) trees, etc. versus the baseline information provided in the RAP
2. Number of persons left with no compensation ( by types of losses) and reasons
3. Number of consultations held (A full assessment about their characteristics of participants, reason for holding consultation, comments, where they held different consultation
4. Number of complaints received (by types) (How they were dealt with
5. Number of grievances resolved
6. Number of grievances outstanding
7. Income change due to land acquisition
8. Appropriate application of entitlement matrix

**EIB Monitoring:** Bank supervision missions will regularly and systematically review the progress reports of the RAP implementation and documentation for different activities

## ANNEXES

### Annex I: Contributors to the RAP

1.	Dr. Anan Mohamed Aly	Senior Social expert (EcoConServ)
2.	Miss. Mona Abu Bakr	Social Specialist (EcoConServ)
3.	Team of surveyors	

Annex II:Map showsthe sites of the towers

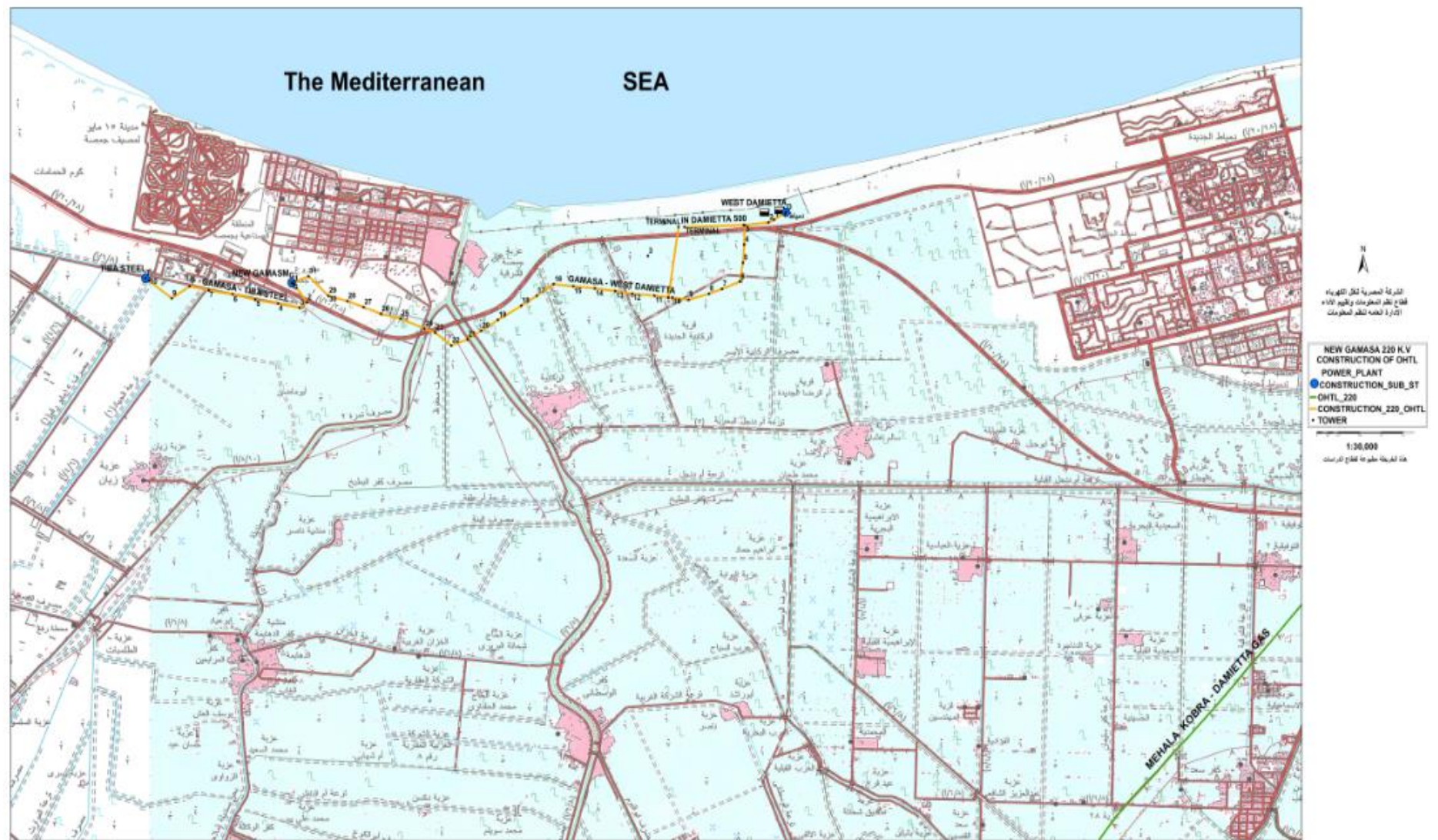




Table models of towers of the OHTLs

220 kV, Gamasa \ West Damietta power plant - 220 kV, Gamasa \ TIBA Steel with approximately 3.5 kilometre

جدول طرازات الابراج للخط هوائي مزدوج الدائرة ثنائي الحزمة  
جهد 220 ك.ف محطة محولات جمصة / طيبة للحديد بطول حوالي 3,5 كم

structure No.	station	height adjust	x	y	z	span	angle	structure type	insulator type
PORTAL TEBA			357590.971	3478608.477	94.258	25		modified portal22m	
TERMINAL TEBA	25		357583.527	3478584.611	94.258	233.014	59.1152	yt90	6ST+6DT
T1	258.014		357357.01	3478529.971	94.978	176.992	-80.8813	y90	12DT
T2	435.006		357370.721	3478353.511	94.331	222.719	-61.1605	y90	12DT
T3	657.725		357573.553	3478261.517	94.398	236.75		s2	6SS
T4	894.474		357789.163	3478163.728	94.555	337.501	-58.9582	s60	12DT
T5	1231.98		358067.1	3478355.19	93.89	314.278	47.1309	s60	12DT
T6	1546.25		358373.846	3478286.798	93.865	361.687		s2e4	6DS
T7	1907.94		358726.864	3478208.088	93.861	330.53		s2	6DS
T8	2238.47		359049.473	3478136.159	94.718	368.943		sdril	6DS
T9	2607.41		359409.574	3478055.871	94.203	404.963		sdril	6DS
T10	3012.38	2	359804.831	3477967.744	93.96	140.62	-48.5997	yt90E8	12DT
T11	3153	2	359918.552	3478050.459	95.433	365.532	-85.0185	yt90E8	12DT
Terminal Gama	3518.53		359730.02	3478363.62	94.39	50.096	41.8992	yt45	6 DT+6 ST
Portal Gamasa	3568.62		359739.45	3478412.82	94.32			portal gamasa	

The total length of conductor AAAC 405 mm<sup>2</sup>= 45000 m= 45 Km

THE total length of conductor AACSR 94.1 mm<sup>2</sup>= 3700 m= 3.7 Km

NOTE:

ST: SINGLE TENSION INSULATOR

DT: DOUBLE TENSION INSULATOR

SS: SINGLE SUSPENSION INSULATOR

DS: DOUBLE SUSPENSION INSULATOR



**Annex III: Sample of The negotiation notice from one of the previous electricity projects**

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Photo removed by EIB to protect personal data

#### **Annex IV: Names of PAPs**

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List of the names of the people that must be compensated (PAPs)

List of names removed by EIB to protect personal data

List of names removed by EIB to protect personal data

**Annex V: Questionnaire Sheet**

**Affected people compensation Questionnaire**  
**RESETTLEMENT ACTION PLAN**  
**New Gamasa GIS Substation and its interconnecting Overhead**  
**Transmission lines**

**Data is highly confidential and will not be used for purposes other than compensation**

Questionnaire code <span style="border: 1px solid black; display: inline-block; width: 40px; height: 20px;"></span>	Governorate : <span style="border: 1px solid black; display: inline-block; width: 40px; height: 20px;"></span> .....
1. District: .....	2. Local Unit: ..... <span style="border: 1px solid black; display: inline-block; width: 40px; height: 20px;"></span>
3. Village: .....	4. Ezbit: .....
5. Agricultural Association Representative .....	6. Name of Agricultural Association ..... ...
7. Date:---/---/-----	8. EEETC Representative .....
<b>For data collector: the shaded part should be filled by EETC</b>	
	9. Total affected area in Qirate: .....
	10. Information about affected crops:-----
	11. Type of impact:-----
13. Date of compensation to be received	12. Total compensation : .....
14. Signature of the technical person responsible for the census	

## 15. Information about the affected person

<b>a. Crop owner</b>	-----
<b>b. Gender</b>	Male-----1    Female-----2
<b>c. Age</b>	[       ]
<b>d. Educational status</b>	[       ] -----
<b>e. Main occupation</b>	[       ] -----
<b>f. Secondary Occupation</b>	[       ] -----
<b>g. Contact Data</b>	Address:----- ----- Mobile:----- Telephone:-----

## 16. Legal possession of land:

- |                      |   |
|----------------------|---|
| Legal ownership      | ၁ |
| Illegal ownership    | ၂ |
| Legal land tenant    | ၃ |
| Illegal land tenant  | ၄ |
| Other (specify-----) | ၅ |

## 17. In case of legal possession, Does the affected person have all documents (Ask the agriculture association :

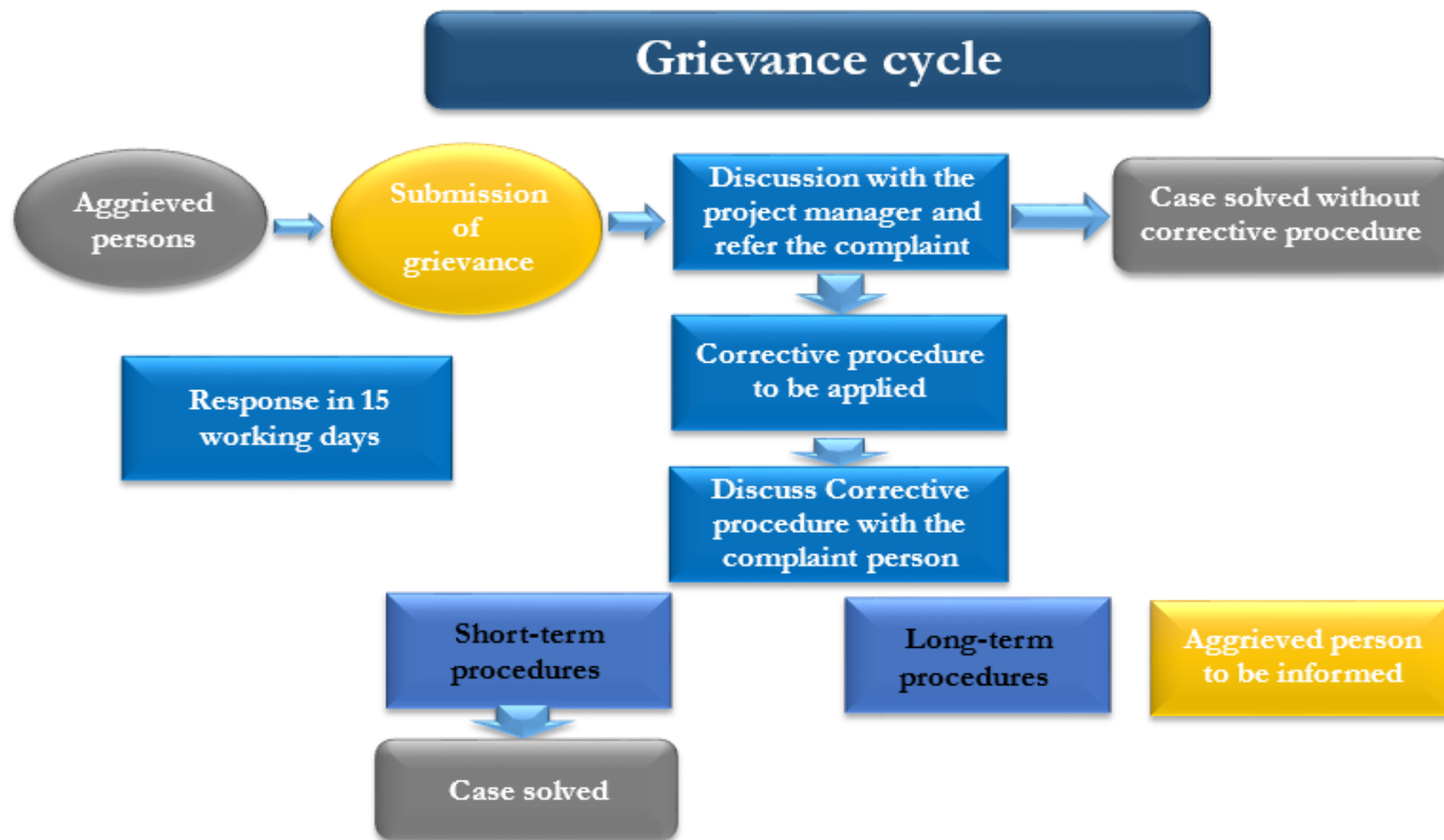
Yes all.....1      Yes some.....2  
No.....3      Other Specify.....4

[       ]

## 18. What are the documents available? Please enclose a copy of them (if possible)

.....  
.....

[       ]

**Annex VI: Grievances and Redress Mechanism Sample**

Community Sample Grievance Form Template							
<b>Reference No:</b>							
<b>Full Name</b> (optional for non-anonymous complaints)							
<b>Gender</b>		<b>Age</b>		<b>Family</b>		<b>Location</b>	
<b>Contact Information</b>  Please mark how you wish to be contacted (mail, telephone, e-mail).		<input type="checkbox"/> By Post: Please provide mailing address: <input type="checkbox"/> By Social media <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail					
<b>Description of Incident or Grievance:</b> <div style="float: right; text-align: right;">           What happened? Where did it happen? To whom did it happen? What is the result of the problem?         </div> <hr/> <hr/> <hr/>							
<b>Date of Incident/Grievance</b>							
		<input type="checkbox"/> One time incident/grievance (date        ) <input type="checkbox"/> Happened more than once (how many times?    ) <input type="checkbox"/> On-going (currently experiencing problem)					
<b>What would you like to see happen to resolve the problem?</b>							
<hr/> <hr/> <hr/>							
<b>Signature and stamp of the complainant</b> _____							



## Grievances Leaflet



Ministry of Electricity and Energy

Egyptian Electricity Transmission Company

**Complaints and grievances mechanism**  
**for project affected persons of**  
**The OHTL**

This leaflet explains the procedures to be followed in case of receiving complaints from the project affected persons of the OHTL project. The leaflet was prepared to facilitate recipient, responding and solving the complaint.

**Complaints recipient**

The aggrieved person can submit a complaint, he/she has the right to select among various methods of complaint submission: by Hand, by Mobile, EETC Hotline, SMS Number, or by Mail.

He should submit the complaint to either one of the following:

- Project/ Site Manager: Eng. Gamal Gbre- mobile: 01009867583
- EETC Hotline: 121
- SMS Number: 91121
- EETC Website (Delta Electricity Zone): <http://www.eetc-delta.com.eg>
- Mail (Delta Electricity Zone): The Intersection of Corniche road with road of the City - Talkha - Mansoura City - Dakahlia Governorate.

The complaint will be responded to within one month.

Your cooperation is highly appreciated



**وزارة الكهرباء والطاقة**  
**الشركة المصرية لنقل الكهرباء**  
**آلية الشكاوى والتظلمات**  
**للأشخاص المتضررين من المشروع**  
**وخطوط النقل**

تشرح هذه النشرة الإجراءات الواجب اتباعها في حالة تلقي الشكاوى من الأشخاص المتضررين من المشروع في مشروع خطوط نقل الكهرباء من محطة جسيمة الجديدة. تم إعداد المنشور لتسهيل إرسال الشكاوى والرد وحل الشكاوى.

**مستلم الشكاوى**

يمكن للأشخاص المتضررين أن يقدم شكاوى، وله / لها الحق في الاختيار من بين طرق مختلفة لتقديم الشكاوى: بالهاتف أو عبر الهاتف المحمول، أو الخط الساخن لشركة نقل الكهرباء، أو رقم الرسائل القصيرة، أو عن طريق البريد.

يجب تقديم الشكاوى إلى أي مما يلي:

- مدير المشروع / الموقع: م. جمال جبر - جوال: ٠١٠٠٩٨٦٧٥٨٣
- الخط الساخن لشركة نقل الكهرباء: ١٢١
- رقم الرسائل القصيرة: ٩١١٢١
- الموقع لمنطقة كهرباء الدلتا: <http://www.eetc-delta.com.eg>
- العنوان البريدي (منطقة كهرباء الدلتا): تقاطع طريق الكورنيش مع طريق المدينة - طلخا - مدينة المنصورة - محافظة الدقهلية.

سيتم الرد على الشكاوى خلال شهر واحد كحد أقصى.

نشكر تعاونك معنا