






99M – ALEXANDRIA REGIONAL METRO PHASE 1 – ABOU QIR to MISR STATION

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR ABOU QIR METRO **FINAL REPORT**



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FOR ABOU QIR METRO FINAL REPORT

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TABLE OF CONTENT

1	INTRODUCTION	8
1.1	PROJECT BACKGROUND	8
2	STAKEHOLDER ENGAGEMENT REQUIREMENTS	11
2.1.1	EGYPTIAN LEGISLATIVE REQUIREMENTS	11
2.2	INTERNATIONAL REQUIREMENTS	11
2.2.1	PERFORMANCE REQUIREMENT OF THE EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD)	11
2.2.2	STANDARD OF THE EUROPEAN INVESTMENT BANK	12
2.2.3	STANDARD OF THE WORLD BANK (WB)	13
2.2.4	STANDARD OF THE ASIAN INFRASTRUCTURE INVESTMENT BANK (AIIB)	13
3	STAKEHOLDER IDENTIFICATION AND ANALYSIS	14
4	SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	21
4.1	DURING THE PREPARATION OF THE ESIA STUDY 2017	21
4.2	MEETINGS AND DISCUSSIONS WITH NAT AND THE GOVERNMENTAL ENTITIES ABOUT THE PROJECT	22
4.3	STAKEHOLDER CONSULTATION AND ENGAGEMENT DURING THE ESIA PREPARATION	22
4.4	FUTURE STAKEHOLDERS ENGAGEMENT ACTIVITIES	23
5	DISCLOSURE OF INFORMATION	24
6	STAKEHOLDER ENGAGEMENT PROGRAM	26
7	GRIEVANCE MECHANISM	32
7.1	OBJECTIVES	32
7.1.1	NAT CURRENT GRIEVANCE MECHANISM	32
7.2	INSTITUTIONAL RESPONSIBILITY FOR GRIEVANCES	32
7.3	GRIEVANCE TIERS	33
7.4	GRIEVANCE CHANNELS	33
8	MONITORING AND REPORTING	36
9	RESOURCES AND RESPONSIBILITIES	37
10	APPENDICES	38
APPENDIX 1: STAKEHOLDER CONSULTATION AND ENGAGEMENT DURING THE ESIA PREPARATION		38
APPENDIX 2: NAT CURRENT GRIEVANCE MECHANISM		43

APPENDIX 3: SAMPLE GRIEVANCE FORM & REGISTER	44
APPENDIX 4: STAKEHOLDER ENGAGEMENT (PR10)	46

LIST OF TABLES

Table 3-1: Detailed list of stakeholders	14
Table 3-2: Preliminary Stakeholder Analysis and Priority Contact List for the Project	18
Table 4-1: Stakeholders meetings conducted	22
Table 6-1: Stakeholder Engagement Program	28

LIST OF ABBREVIATIONS

ACRONYM	DEFINITION
AIP	Access to Information Policy
AFD	Agence Française de Développement
APTA	Alexandria Passenger Transportation Authority
E&S	Environmental and Social
EEAA	Egyptian Environmental Affairs Agency
EBRD	The European Bank for Reconstruction and Development
EIB	European Investment Bank
ENR	Egyptian National Railways
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
GIP	Good International Practice
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
IFI	International Financial Institution
KIIs	Key Informant Interview
MOT	Ministry of Transport
NAT	National Authority for Tunnels
NGO	Non-Governmental Organization
PAPs	Project Affected People
PR	Performance Requirements
PMU	Project Management Unit
RAP	Resettlement Action Plan
RoW	Right of Way
SDO	Social Development Officer
SEP	Stakeholder Engagement Plan

1 INTRODUCTION

The Stakeholder Engagement Plan (SEP) describes the effective method for NAT to interact and consult with identified stakeholders for Abou Qir Metro project, Alexandria Governorate.

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, and grievance mechanism. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development.

The SEP includes a strategy to provide timely, understandable (in the form and language) and appropriate information to stakeholders and ensure that these stakeholders have the opportunity to express their views and make comments, and obtain timely and adequate responses to their concerns and expectations.

The SEP is a "living document" and will continue be updated throughout the ESIA process as new stakeholders are identified and based on learnings and information received in previous phases of engagement. It will contain engagement meeting minutes so that engagement is well documented and its outcomes are recorded and acted upon by the Project in its decision-making.

1.1 Project Background

Alexandria is underway to start implementing two transportation projects; the first being development of the Al-Raml tram line, and the second to establish a 43 kilometer metro line from Abou Qir in east Alexandria to the west at a cost of US\$2.5 billion . According to the plan drawn up by the Ministry of Transport, the new Abou Qir metro aims to reduce traffic congestion in the coastal city streets. The existing line suffers from the lack of daily maintenance and the operation condition is generally poor which influences the operating safety and efficiency. The infrastructure and rolling stock are also in a very poor state. The rolling stock fleet is small (6 trains used to operate the line), which also impacts the level of service of the line.

At peak time, there is a train every 10mn and it takes about 50mn to go from Abou Qir to Misr. In the past few years, the number of services has dramatically decreased, from about 200 services a day to a little over 100 services today, which has greatly impacted the ridership, estimated to 71,000 passengers a day. The project will be implemented in three phases, the first of which includes relying on the current Abou Qir railway route which extends for 22 kilometers from Abou Qir to Misr station.

The European Bank for Reconstruction and Development (the "EBRD"), together with the European Investment Bank ("EIB"), Asian Infrastructure Investment Bank (AIIB) and the Agence Française de Développement (AFD) are considering providing finance to the Government of Egypt to finance first phase, namely, the upgrade and electrification of an existing rail line connecting downtown Alexandria and north-eastern Abou Qir into a high capacity metro system.² Historically, the Abou Qir line was established as a suburban railway line under the jurisdiction of the Egyptian National Railways ("ENR"). Ownership will be transferred to the National Authority for Tunnels ("NAT") once the line is transformed into a high capacity metro and, NAT will be responsible for the implementation of the

Project and will be responsible for supervising the operation; which will be by a specialized operator (not identified yet). A tender for the operation of the Metro will be run so that the operation & maintenance contractor(s) are nominated and participating to the final stages of construction. A Feasibility Study was commissioned by NAT in December 2019 and is currently being undertaken by SYSTRA.

The Feasibility Study will identify and update the Project detailed technical scope and budget, including an economical and financial assessment, a procurement and contracting approach, and detailed implementation schedule estimates. The existing Abou Qir line is about 22 kilometers long, double track regional railway connecting very dense areas in the center and the eastern part of the city. It starts from Alexandria central station (Misr station) connecting the central area with Abou Qir and includes 20 stops.

The Alexandria Regional Metro Phase 1 is a 21.5 km metro project that will run on the existing train line between Misr Station and Abou Qir station. This will include replacing the existing diesel train and its track with an electrified metro.

Phase 1 includes 20 stations, of which 15 are existing stations and 5 are new stations that will be constructed. The project's scope also includes the decommissioning of Al Raml railway station. The existing alignment will be followed and there are 2 proposed viaducts that cover the densely populated urban areas and multiple level crossings. From the 20 total stations proposed for the metro, there is a total of 13 elevated stations on the viaduct and 7 at grade stations. The metro line will be a dual track and will be uninterrupted by level crossings. This is considered to be the final alignment as was validated by NAT on 7 June 2021. Which will require a construction timeline about three years.

Phase 1 will be implemented entirely within the corridor of the existing Abou Qir trainline and there are no expansions or extensions that will be part of this Phase. The construction works of the Abou Qir metro line will include the following elements:

- Decommissioning of the existing Abou Qir train ENR line and its associated infrastructure including the stations
- Rolling Stock with a capacity of 2,500 passengers in AW2' conditions (7p/m²)
- Civil and Construction works for the Depot, Stations, and the Viaduct. The viaducts will be constructed following the proposed Monopile approach to mitigate the need for extra land outside the existing corridor of the train. A total of 13 stations will be located on the section with viaduct.
- Electrical and Mechanical works for the track and the infrastructural system to be implemented for the metro, and Setting up power supply for the metro
- Implementation of Signalling system and Centralized Control system throughout and across the metro line.
- Automated Fare collection system at the stations
- Track replacement and operational works
- Diversion of existing ENR tracks, and fencing of the metro track from the ENR track between Misr Station and Kafr Abdou.
- Diversion of Public utilities during the construction works if necessary

99M – ALEXANDRIA REGIONAL METRO PHASE 1 – ABOU QIR to MISR STATION

This phase also includes the following associated infrastructure as part of the project:

- Pedestrian Underpasses and Footbridges
- Fencing of the corridor
- Depot (maintenance workshop)
- Centralized control and administrative building, and high voltage sub-station

Note: With the change of alignment in June 2021, there is no longer any road Underpasses and Bridges to be constructed.

2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

The stakeholder engagement activities introduced in this SEP will be conducted in accordance with:

- Regulatory Requirements of Egypt; and
- EBRD's policy requirements on information, disclosure, stakeholder engagement, & meaningful consultation (PR 10).
- EIB Standard No. 10: Stakeholder Engagement of the Environmental and Social Standards
- WB ESS10: Stakeholder Engagement and Information Disclosure

In line with the Environmental and Social requirements of the national and international regulations, the project is categorized as an **A Category** Project and the project will consequently be required to follow all disclosure requirements for that category as described below.

2.1.1 Egyptian Legislative Requirements

Egyptian legislative requirements for stakeholder engagement are mainly included within the undertaking of the ESIA. The "Environment Law No. 4 of 1994 and subsequent amendments" require that an ESIA study shall be undertaken for projects with significance impacts, including two phases of stakeholder consultation: scoping and public consultation.

The scoping should include targeted stakeholder consultations with key stakeholders as applicable. In addition, the public consultation is required to include the following entities:

- Representatives of the EEAA
 - Related government authorities
 - Representatives of the Governorate and local units where the project is located
 - Affected groups including local businesses and communities
 - NGOs and civil society groups
- **EEAA guidelines methodology**

The articles covering the guidelines on conducting public consultations as part of the ESIA study are as follows:

- Paragraph 6.4.3.1 Scope of Public Consultation
- Paragraph 6.4.3.2 Methodology of Public Consultation
- Paragraph 6.4.3.3 Documentation of the Consultation Results
- Paragraph 7 Requirement and Scope of the Public Disclosure.

2.2 International Requirements

2.2.1 Performance Requirement of the European Bank for Reconstruction and Development (EBRD)

Projects financed by the EBRD are required to meet best international practice as regards environmental and social performance and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy of April 2019. These requirements are described in detail in PR 10 of the Policy "Information Disclosure and Stakeholder Engagement".

The stakeholder engagement process, which is an ongoing process that should commence in the early stages of a project includes:

The EBRD PR 10 focuses on information disclosure and stakeholder engagement and has the following objectives:

- To identify people or communities that are or could be affected by the project, as well as other interested parties. Which requires clients to outline and document stakeholders who are likely to experience project impacts.
- To ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.
- To maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

The EBRD PR10 requires that, during project preparation, stakeholders are identified and analysed and that a stakeholder engagement plan is prepared.

Resources for public information and engagement should focus on affected parties with a particular attention to those that may be differentially affected by the project because of their disadvantaged or vulnerable status.

The EBRD PR10 requires consultation to be meaningful, meaning that it should be:

- Based on the disclosure of relevant and adequate information including draft documents and plans, to allow comment prior to decisions being taken when options are still open¹.
- Begin early in the environmental and social appraisal process.
- Focus on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these.
- Carried out on an on-going basis, as the nature of issues, impacts and opportunities evolve.

Performance Requirement 10 also emphasizes on the necessity of continuous reporting to identified stakeholders during the Project's implementation. The proponent has to report additional adverse impacts and significant alterations to planned activities should they occur. If such impacts and alterations are significant, the proponent may need to carry out additional information disclosure and consultation.

In addition, consultation activities will follow the EBRD Guidance note to Stakeholder engagement, briefing note, COVID-19, 15 April 2020².

2.2.2 Standard of the European Investment Bank

The European Investment Bank's (EIB) Stakeholder Engagement Standard (No. 10) requires that clients:

- Establish and maintain constructive dialogue between the promotor, affected communities and interested parties throughout the Project lifecycle;
- Ensure all stakeholders are properly identified and engaged;

¹ Public disclosure of the draft ESIA, on the Internet as well as in local information points will be made for a minimum of 120 days.

² [https://www.google.com/search?q=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+\(1\).pdf&rlz=1C1GCEU_enEG822EG824&oq=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+\(1\).pdf&aqs=chrome..69i57.4794j0j7&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+(1).pdf&rlz=1C1GCEU_enEG822EG824&oq=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+(1).pdf&aqs=chrome..69i57.4794j0j7&sourceid=chrome&ie=UTF-8)

- Engage stakeholders throughout the Project lifecycle in line with the principles of public participation, non-discrimination and transparency; and
- Ensure that all stakeholders are given equal opportunity and voice, regardless of status.

In addition, consultation activities will follow the EIB Guidance note to promoters on environmental and social performance, in EIB-financed operations in response to the COVID-19 outbreak crisis Annex 4 – Stakeholders engagement May 2020.

2.2.3 Standard of the World Bank (WB)

THE WB ESS10: Stakeholder Engagement and Information Disclosure, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice”. Specifically, the requirements set out by ESS10 are the following:

- Promoter will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- Stakeholders’ inputs will be documented and carefully considered throughout the project preparation and implementation phases.
- Stakeholder engagement, including disclosure and dissemination of information.
- According to ESS10, the promoter should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

In addition, consultation activities will follow the WB Guidance in response to the COVID-19.

2.2.4 Standard of THE Asian Infrastructure Investment Bank (AIIB)

Standard 1: aims to promote the integration of sound environmental, social and sustainability practices with project decision making processes and implementation. Furthermore, the client is to:

- Ensure information on the project is made accessible to affected communities and stakeholders, in a culturally appropriate manner and in a widely utilized language through meaningful consultation that takes place prior to the commencement of the project.
- The client should also establish an efficient grievance mechanism that enables stakeholders to express concerns and receive feedback in a timely manner.
- Moreover, to reduce risks on communities, social risks and impacts should be assessed, including the identification of vulnerable groups and potential discrimination particularly that associated with gender.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The first step in the process of stakeholder engagement is stakeholder identification; that is, determining the various categories of project stakeholders, and their needs. Stakeholders are considered any person, groups of people, or entities that;

- Might be directly or indirectly, positively or negatively affected by the project in any phase of the project’s construction and implementation.
- Might have an environmental or social interests taking place as a consequence of the project, or might impact project-related decisions and implementation in a way or another.

Most importantly, identifying stakeholder representatives is key to carrying out effective stakeholder engagement activities. These representatives do not only inform the project with their valuable information, but they also serve as a communication channel to disseminate information to large numbers of groups and receive feedback from them.

In the following table includes the potential primary and secondary stakeholders of the Project. Primary stakeholders are the ones who are affected directly by the project whether in a positive or a negative manner. Secondary stakeholder are those who are indirectly influenced by the project either positively or negatively.

Table 3-1: Detailed list of stakeholders

Categories	Stakeholder Groups	Role
Primary stakeholders		
Potential Affected Communities	Residents and commercial activities in the communities within the project area Local communities near to the Metro line, new stations and depot areas, as it is the main construction site. Communities near the main crossings.	<ul style="list-style-type: none"> • Residents are more likely to be adversely affected by environmental and social impacts. For example, due to traffic during construction and other impacts relating to community health and safety. • Residents of local communities will also potentially benefit from job opportunities or other positive economic outcomes, particularly, from safe crossings.
	job seekers	
	users of the present and future pedestrian crossings	<ul style="list-style-type: none"> • Might be impacted by the increased traffic during construction or by road closures
	Road users	
	Train users	<ul style="list-style-type: none"> • They are the existing train users. • Train users are more likely to be adversely affected by social impacts. • Given that they are directly affected by the suspension of the train service and they are the direct beneficiaries from the metro project.
Future metro users	<ul style="list-style-type: none"> • They are the direct future beneficiaries from the metro project. 	

Categories	Stakeholder Groups	Role
	Women, including Female Train Users	<ul style="list-style-type: none"> Women living in neighboring areas to the construction sites may be differently affected by the project if safety and security concerns/mitigation measures are not considered. Moreover, if safety issues are not considered in the stations, female rail users may not benefit as much from the project.
	Persons with disabilities	<ul style="list-style-type: none"> If accessibility concerns are not included in the metro stations and new Pedestrian crossing bridges; persons with disabilities may not benefit from the project and they become more vulnerable to impact from the project to limit their movement due to the closure of level crossings.
	RoW users	<p>Formal/ Informal economic activities that are located on the ENR RoW; they are likely to be affected, especially if this is their only source of livelihood.</p> <ul style="list-style-type: none"> Shops and kiosks tenants in the existing stations and along the right of way of the current railway corridor against a monthly fee; Squatters inside the railway track.
	Vulnerable groups	<ul style="list-style-type: none"> Vulnerable groups may likely be adversely affected by environmental and social impacts, while also being least likely to benefit from the project. The vulnerable groups here include persons with disabilities, women, including female rail users, street vendor and land users of the right of way of the rail corridor.
Secondary stakeholders		
Environmental Sector	Ministry of Environment - Egyptian Environmental Affairs Agency (EEAA)	<ul style="list-style-type: none"> Responsible for developing public policies related to the protection of environment and improving its quality. In addition, it is responsible for issuing regulations for environmental determinants and monitoring their implementation. Responsible for reviewing and approving EIA, and monitoring implementation of the Environmental Management Plan.
	Environmental Office within the Governorate	<ul style="list-style-type: none"> Responsible for monitoring compliance to environmental requirements.
Line ministries	Ministry of Finance	<ul style="list-style-type: none"> They are to cooperate with the International Financial Institutions (EBRD, EIB, AfD) in financing the project
	Ministry of International Cooperation	<ul style="list-style-type: none"> Responsible for directing the dealings with donors for development projects in the government sector.
	Alexandria Governorate	<ul style="list-style-type: none"> The main role of the governorate is supporting the project by providing the various permits required, infrastructure maps, and government studies, statistics and reports related to areas of influence.

Categories	Stakeholder Groups	Role
Local Governmental Entities	Local units in the Governorate - Muntazah Awal District - Muntazah Tany District - Waset District - Sharq District	<ul style="list-style-type: none"> The main role of the district authority is the provision of support to the project through mobilizing people to gain information about the project. Permits for construction should be prepared by the governorate and approved by the LGU.
	General Authority for Roads, Bridges and Land Transport	<ul style="list-style-type: none"> Rehabilitation of roads, which is one of the major issues raised by the community, Responsible for permitting related to any road work for the project (e.g., road cutting)
	Alexandria Passenger Transportation Authority (APTA)	<ul style="list-style-type: none"> On behalf of the Governorate of Alexandria, APTA will be responsible for preparing and providing buses, minibuses and shared taxis to meet the sharp demand on public transport during construction. Thus, as the project transitions from pre-construction to decommissioning to construction, there will be a proportional increase of stress on existing road traffic and public transportation infrastructure.
	Sanitation Directorate	<ul style="list-style-type: none"> Providing the project with maps of sanitation facilities near the construction site, and utilities diversion areas. Providing the project with wastewater disposal services from excavation sites.
	Alexandria Water Company	<ul style="list-style-type: none"> Providing the project with maps of water supply networks near the construction site, and utilities diversion areas. Providing the project sites with Water services.
	Telecommunications	<ul style="list-style-type: none"> Providing the project with maps of cables networks near the construction site, and utilities diversion areas.
	Traffic General Directorate	<ul style="list-style-type: none"> Responsible for managing the traffic movement in the governorate. NAT coordinates with Traffic General Directorate before the start of construction to set traffic plans, and make all procedures for traffic diversions, and construction sites at major intersections; to avoid impacts on traffic as much as possible.
	Alexandria Antiquities Directorate	<ul style="list-style-type: none"> Responsible for conduct a Ground Sensing Radar survey/ exploratory sessions for the excavation sites; to ensure that they are free of any archaeological discoveries. Then provide permission to allow construction workers to resume work.
	Urban Planning	<ul style="list-style-type: none"> The Urban Planning Department is working on preparing the strategic development plan for Alexandria Governorate 2032, for which the Abou Qir metro project is one of the main axes in the study of transport in the plan.

Categories	Stakeholder Groups	Role
	Electricity Transmission Company	<ul style="list-style-type: none"> Providing the project with maps of Over Head Transmission Lines and underground cables near the construction site, and utilities diversion areas. Responsible for supplying the project with electricity services during construction and operation.
	Health Directorate	<ul style="list-style-type: none"> Providing health care services to workers at construction sites, conducting examinations, instructions, and awareness-raising related to infectious diseases, COVID-19. Responsible for the administrative building whose land is required to be acquisition for the Bab Sharq station (PAP)
	Local Labour Offices	<ul style="list-style-type: none"> Responsible for monitoring conditions of the workplace and mediating any conflicts between workers and management
Project Owner	National Authority for Tunnels (NAT)	<ul style="list-style-type: none"> Implementing agency overseeing activities of the Environmental and Social Management Plan and monitoring activities.
	Ministry of Transport	<ul style="list-style-type: none"> NAT is affiliated to the Ministry of Transport;
Other Governmental Entities	The Egyptian General Authority for Land Survey (head quarter and Alexandria Directorate)	<ul style="list-style-type: none"> They will be responsible for participating in any land acquisition or livelihood restoration activities.
	Egyptian National Railways (ENR)	<ul style="list-style-type: none"> The current owner of the project land
	Ministry of the Business Sector	<ul style="list-style-type: none"> The owner of copper/ Al Nahass land (land of the depot and Kafr Abdou Station) (PAP).
	Ministry of Endowments (Awqaf)	<ul style="list-style-type: none"> The Ministry is responsible for Islamic houses of worship in Egypt. Coordinate with the Ministry for demolishing mosques and the establishment of other alternatives (Mosques built on ENR properties in the track of the Abou Qir railway line). They compensated for the affected mosques.
	Ministry of Interior	<ul style="list-style-type: none"> Responsible for national and local security, as well as approving emergency response and fire-fighting plans for establishments/projects
Project lender	EBRD, EIB, AfD, AIIB	<ul style="list-style-type: none"> Provide financing and technical assistance Approving the studies that are prepared for the project (ESIA, RF, RAP, SEP, ESAP) Approving the Design Change Management Procedure (DCMP).
Contractors	contractors not yet identified	<ul style="list-style-type: none"> Responsible for construction work
Workers	Contractor workers during construction, employees and technicians during operation	<ul style="list-style-type: none"> Responsible for construction, operation, and compliance with company policy, occupational health and safety standards and codes of conduct.

Categories	Stakeholder Groups	Role
Civil Society	Local NGOs in the regional and headquarter levels, as well as the local Community Development Associations (CDAs) Grassroots Community-Based Organizations (CBOs)	<ul style="list-style-type: none"> They are responsible for sharing information with the community, in practical terms, the safe crossing Organizations with direct interest in the project and which may have useful data or insight into local issues of relevance to the project. These organizations can also influence the views of others regarding the project, nationally and internationally. Responsible of sharing information with the community In the case of this project, it may be useful to engage specifically with NGOs and CDAs focusing and women related issues as well as persons with disabilities.
Media	<ul style="list-style-type: none"> Local media Online journalism 	<ul style="list-style-type: none"> Disclosure of information about the project. Publicize awareness raising campaigns
Suppliers and Traders	Private companies	<ul style="list-style-type: none"> Mainly potential tenderers for the construction works.
	Traders (small-scale stores) (unofficial suppliers)	<ul style="list-style-type: none"> Provide construction materials. Provide fuels to cars and machineries. Provide workers with food and amenities.
Academia	Research Institutes	<ul style="list-style-type: none"> Research centres, consultancy firms, and experts are academic and technical entities, which support in conducting studies and providing technical training to various target groups
	Consultancy firms	
	Experts	

Further to the above, a Preliminary Stakeholder Analysis is undertaken below to clarify stakeholders' interest in the Project and their ability to impact the Project's development. Accordingly, a priority contact list is identified.

High rating for priority contact list indicates importance of continuous and regular consultation and engagement. On the other hand, medium rating for priority contact list does not reduce the importance of the entity as a stakeholder but indicates that their engagement is required at specific stages or milestones of the Project.

Table 3-2: Preliminary Stakeholder Analysis and Priority Contact List for the Project

Stakeholder Groups	Level of Interest			Ability to Impact			Priority		
	Low	Medium	High	Low	Medium	High	Low	Medium	High
Primary stakeholders									
Residents and Local communities near to the Metro line,			√			√			√
job seekers			√			√			√
users of the present and future pedestrian crossings			√			√			√
Road users			√			√			√

Stakeholder Groups	Level of Interest			Ability to Impact			Priority		
	Low	Medium	High	Low	Medium	High	Low	Medium	High
Train users			√			√			√
Future metro users			√			√			√
Women, including Female Train Users			√			√			√
Persons with disabilities			√			√			√
RoW users			√			√			√
Vulnerable groups			√			√			√
Secondary stakeholders									
Ministry of Environment - Egyptian Environmental Affairs Agency EEAA			√			√			√
Environmental Office within the Governorate			√		√			√	
Ministry of Finance			√		√			√	
Ministry of International Cooperation			√	√				√	
Alexandria Governorate			√			√			√
Local units in the Governorate (District)			√		√			√	
General Authority for Roads, Bridges and Land Transport			√		√				√
Alexandria Passenger Transportation Authority (APTA)			√		√				√
Sanitation Directorate			√		√				√
Alexandria Water Company			√		√				√
Telecommunications			√		√				√
Traffic General Directorate			√		√				√
Alexandria Antiquities Directorate			√		√				√
Urban Planning			√		√				√
Electricity Transmission Company			√		√				√
Health Directorate		√			√			√	
Local Labour Offices		√			√			√	
National Authority for Tunnels (NAT)			√			√			√
Ministry of Transport		√			√			√	

Stakeholder Groups	Level of Interest			Ability to Impact			Priority		
	Low	Medium	High	Low	Medium	High	Low	Medium	High
The Egyptian General Authority for Land Survey (head quarter and Alexandria Directorate)			√	√					√
Egyptian National Railways (ENR)			√	√					√
Ministry of the Business Sector			√			√			√
Ministry of Endowments (Awqaf)			√			√			√
Ministry of Interior		√			√			√	
EBRD, EIB, AfD, AIIB		√			√			√	
contractors			√		√			√	
Contractor workers during construction, employees and technicians during operation			√			√			√
Non-governmental Organizations (NGOs) and Community Based Organizations (CBOs)			√		√			√	
Media		√		√				√	
Suppliers and Traders		√			√			√	
Academia		√			√			√	

Different stakeholders have different needs for information and levels of interest in engaging with the project. Different stakeholder groups will also require different engagement approaches depending on their socio-cultural characteristics. Furthermore, stakeholders and their level of interest and/or connection to the project often change over time through the development phases of the project.

4 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

This section presents the consultation activities that have been conducted for the project to date. Previous consultation activities were limited to the consultations that took place for the Abou Qir Metro project and NAT's meetings with the governorate authority and affiliated departments for the current project.

4.1 During the preparation of the ESIA Study 2017

An environmental and social impact assessment study was prepared for the Abou Qir Metro Project (2017). The study included consultation activities that took place in two phases (according to the report). The first stage is a survey of a sample of Abou Qir train users and drivers, and the second stage is a public consultation session (no information was included in the report in terms of: its date, number of attendees, and its results).

Survey Sample and results

- 264 beneficiaries were interviewed during the data collection phase.
- 12 drivers, conductors and supervisors were consulted.

The study team has selected a representative sample from the beneficiaries of the train. The total quantitative sample surveyed are 264 people. 197 of them were males while 67 are females. Age distribution of the sample reflected the diversity of surveyed sample. Average age of female sample is 38.76 years. The male sample average age is 43.90 years. 20.1% of the total sample are 20-29 years old. About 40.0% of the sample surveyed are above 50 years old.

The conclusion

- The train is used not only by poor people but it is widely used by all community people. The train is a crucial means of transportation that is used by various community members. Regardless of their economic or their occupational status, most of the beneficiaries used the train as it is quick and not costly means of transportation.
- The sample surveyed reported that they prefer train as it is fast comforting and easy to use. Saving money due to its cheap expenses 1.25 EGP.
- A long list of negative aspects have been reported;
 - The train is always delay and there is no commitment to time or to the stop points,
 - The train is also deteriorated and rust. Most of doors and windows are either opened or not the glass is broken. The glass might broke suddenly and injure the passengers,
 - The train is also not secured as bullies encroach it many times. They robbed not only the passengers but also the conductors. Additionally, itinerant vendors invade the train. They cause both disturbance and fights with the passengers,
 - Lack of security and disciplines, were the main problems reported by the passengers.

4.2 Meetings and discussions with NAT and the governmental entities about the project

Not all the meetings with the governorate authority and affiliated departments were not documented. The following table includes eight meetings with the various concerned government authorities, of which the consultant attended seven meetings to discuss the inventory of occupancies on the line's route, Site visit, requirements for scoping, role and responsibilities of the concerned authorities in Alexandria Governorate.

Table 4-1: Stakeholders meetings conducted

Stakeholder	Date	Purpose/Outcome
ENR, MOT, NAT, SYSTRA, a representative from the Ministry of Endowments	4/2/2020	Inventory of the occupancies on the metro track, including the mosques located in the route.
ENR, MOT, NAT, SYSTRA, ESIA consultant	17/6/2020	Discuss the results of the Inventory of the occupancies on the metro track, including the mosques located in the route.
NAT, SYSTRA, ESIA consultant	16/9/2020	Resettlement/ Evictions along the metro alignment- way forward and action plan
NAT, SYSTRA, ESIA consultant	17/9/2020	Site visit discussion and other requirements for scoping
ENR, MOT, NAT, SYSTRA, ESIA consultant	13/10/2020	Handing of some documents requested before
ENR & MOT, NAT, SYSTRA, ESIA consultant	20/10/2020	Clarification of occupancies on the route of the Abou Qir railway
Alexandria Governorate, NAT, SYSTRA, ESIA consultant	8/12/2020	Discussing the role and responsibilities of the concerned authorities in Alexandria Governorate in the project. Request for documents and maps. Coordination to conduct consultation activities.
Alexandria Governorate & NAT, SYSTRA, ESIA consultant	19/1/2021	Presentation of what has been accomplished from the ESIA study. Nat presentation of the proposed projects for a traffic management plan for construction.

4.3 Stakeholder Consultation and Engagement during the ESIA preparation

Finally, as part of the preparation of the ESIA for the Metro project, number of consultation activities were conducted. Scoping activities were conducted with rail users, Governmental Authorities, and neighboring communities. Below is a brief description of implemented engagement activities to date.

Consultation Methodology and Activities

In terms of methodology, the consultation activities were conducted through the following methods:

- Scoping Consultation Activities in November 2020 to January 2021,
- A public consultation session will be held at a later stage with concerned authorities and project stakeholder to present the findings of the environmental and social impact assessments and related management plans, and the stakeholder engagement plan.

Scoping Consultation Activities

The Consultant carried out stakeholder engagement activities through the community engagement plan that has been developed for different Stakeholders. The consultation activities started in November 2020 and ended in January 2021. The study team conducted multiple site visits to the project area. In addition, field observations were organized at project activities points to define various stakeholders, and the potential impacts of the project, and carried out stakeholder engagement activities through the following methods: Key Informant Interview (KIIs) (30), Focus Group Discussions (FGDs) (22), Meetings (7), and scoping sessions (2).

The Consultant conducted consultation activities with:

- local communities close to the project site
- Governmental Authorities including

The study team conducted multiple site visits to the project areas. In addition, field observations were organized at project activities points to define various stakeholders, and the potential impacts of the project. The aim of the consultation activities was to give a background on the project and its potential impacts during the construction and operation phases and to receive feedback from PAPs and local communities about the project as well as concerns, requirements, and recommendations. For more details see Appendix 1: Stakeholder Consultation and Engagement during the ESIA Preparation.

Information disclosed included:

- The purpose, nature and scale of the project,
- The duration of the proposed activities,
- Potential impacts and respective mitigation measures;

4.4 Future Stakeholders Engagement Activities

Future stakeholder activities will document the following information descriptively on a continuous basis:

- The form in which the information was disclosed (oral, flyers, documents, emails ... etc.), and how it was distributed
- Locations and dates in which meetings are taking place in an updated form
- Stakeholders who were consulted whether individuals, groups, or organizations
- Critical points mentioned and key concerns raised
- Resolutions for potential risks and concerns discussed, and a follow-up actions if applicable.
- The platform used to record those activities
- The dynamics developed to report back to stakeholders.

The stakeholder engagement plan will be constantly updated to the most recent consultation and information-disclosure activities that take place for the current project.

5 DISCLOSURE OF INFORMATION

Information Disclosure and mutual and meaningful communication with different stakeholders is a critical way to assess the project development which would help in identifying key concerns and issues whether environmental or social or both that will be taken into account according to Good International Practice (GIP). Disclosure of information related to the project will follow the national legal requirements along with the international standards of project development.

According to the EEA Guidelines for **Egyptian EIAs**, disclosure of relevant material is an important process and should be undertaken in a timely manner for all Category C projects. This process allows for and opens the channels for meaningful consultations to occur between the project proponent, project-affected groups and local NGOs before the public consultation on the draft EIA. National regulations require that the disclosure of the project is carried out at least two weeks before the date of the session and the availability and disclosure of draft Arabic technical summary to all concerned parties.

Egyptian disclosure requirements described is in line with **Lenders requirements** (EBRD, EIB, WB, AIIB) for Category A projects, for which disclosure is mandatory and all disclosure requirements are applicable. EBRD Access to Information Policy precisely specifies a 120 calendar days disclosure period for Category A project ESIA's in public sector projects prior to Board consideration.

Stakeholders will be provided access to reliable and complete Project information presented in a manner that takes account of specific local conditions, cultural and language preferences of local communities.

To effectively communicate relevant information to diverse stakeholder groups, at the stage, the following documents will be disclosed:

- Environmental and Social Impact Assessment Report (ESIA) including the Environmental and Social Management Plan (ESMP),
- A non-technical summary (NTS),
- Resettlement Framework (RF),
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Action Plan (ESAP)

The Resettlement Action Plan (RAP) will be disclosed as per lenders requirements once completed.

In line with the above, all previous project documents will be available in Arabic and English during the entire Project life. NAT will strictly follow legal requirements for disclosure of information. To ensure accessibility of the disclosed documents, all documents will be available to the public on the NAT's website (<http://www.nat.org.eg/arabic/>) and on EBRD's disclosure website (<https://www.ebrd.com/esia.html>)

The project documents will also be made available in hard copy at NAT's head office located in Ramsis Square, Cairo, Egypt and at the Alexandria Governorate building located on the Agricultural Road, Smouha Entrance. In addition, to make the package accessible along the 22Km route, hard copies will be available in Misr Station (end station), Sidi Gaber station and Abu Qir Station (end station). Interested stakeholders will head to a designated area that will be well equipped with comfortable seating arrangements that will facilitate reading of the documents. As a recommendation, the Station Manager's Office is suggested for the latter purpose. All interested stakeholders will head to the designated area within the stations during

regular working hours to request a review of the Regional Metro disclosure documents. The Station managers will assign one of the station employees as an assistant to explain the different disclosure documents and ensure that all the package is returned and maintained in the proper place and condition. A register will be available to allow people to write comments, questions and inquirers' contact information that will be used to correspond to the inquiry. The assistant will be required to type out or scan all comments, questions and inquirers' contact information and send them to the responsible person at NAT, namely **Eng: Magdy Madany** from NAT's Environmental Affairs Department. **Eng: Magdy Madany** will be responsible for continuous follow up on the comments/questions status with all the centers where the disclosure package is placed to ensure that he has received all comments.

In addition to the disclosure of electronic versions on NAT's website and hard copy versions of the documents, NAT will rely on local media (radio, television, newspapers/ news websites) to disclose information about current and future projects, impacts, and mitigation and/or corrective measures. NAT's existing website allows receiving and responding to comments/grievances. NAT will respond to all comments and suggestions received from all channels, even those that are anonymous that are not submitted through the website.

People can also submit questions / comments related to the project and the ESIA process through the project's email address created specifically for that purpose, alexandriametro.nat@yahoo.com.

Eng: Magdy Madany from NAT's Environmental Affairs Department will collect all questions/comments received through all of the available channels, i.e. received physically or electronically and respond to them.

NAT will carry out public consultations that will reflect upon the issues of relevance to the Project. All interested stakeholders will be timely informed about the exact time and places by using the foreseen means of communications specified in the SEP.

Public hearing events are key stakeholder engagement channels and will therefore be used for the project.

All project documents (Non-technical executive summary including project description, national and international legislation, environmental and social management plan, RF and SEP summary) will be presented and discussed during the public hearings and local authorities (Alexandria Governorate) will be engaged and involved in the organisation of the events..

Two public hearing sessions will be arranged in Alexandria Governorate, one will be hosted in the Alexandria Governorate Building during the day hours and the second will be held in an events hall in the evening after the official working hours to allow attendance of working people. Announcement on the event will be posted in one of the national newspapers that is distributed all over Egypt (Al-Gomhoria) at least two weeks before the date of the sessions³. In addition, posters will be put up in all stations of the project to ensure proper spreading of the information on the sessions. The invitation to the sessions will be drafted in a way that is inviting to all the community members (including men, women, young people, older people etc..) and will be handed out to women in the market and other areas where women are present.

³ NAT is currently coordinating with the Alexandria governorate and the consultant to prepare the necessary arrangements for holding the session.

All concerns, inquiries and comments will be responded to during the sessions, and will be taken into account in the ESIA report. A report on the entire two sessions will be included in the ESIA (Public Consultation and Stakeholder Engagement Chapter) and will include an analysis of the attendees.

Access to information for identified vulnerable groups will be facilitated by NAT as appropriate for each person/ family according to their specific needs and/or situation. Please see Table 3-1: Detailed list of stakeholders that identifies the affected communities including women and vulnerable groups, as well as Table 6-1 for proposed communication tools with each stakeholder group.

Disclosure of information to the government stakeholders will be based on formal notifications, applications and reporting – all usually done via fax or post mail. The formal communication regarding environmental issues, as well as other issues including development and health and safety subjects, will be conducted by NAT as formally responsible for social and environmental performance of the Project's development.

Internal stakeholders (workers/employees) will be informed using the internal communication channels. It is important to apply different methods and communication channels such as: periodical meetings, announcements, information letters and notifications posted on bulletin boards, trainings and flow of information through the management chain. A communication officer will be assigned (or one of the existing employees assigned these responsibilities) for documenting the communication activities targeting communities/ PAPs and workers.

Due to the current COVID-19 crisis, the project will take the precautionary approach as long as the risk exists, to minimize the risk of COVID-19 transmission during information disclosure and consultation activities, by disseminating information through digital platform (where available) and traditional means of communications. Consultation activities will follow the EBRD Guidance note to Stakeholder engagement, briefing note, COVID-19, 15 April 2020.

The appointed person for SEP implementation will be the Social Development Officer SDO in the Environmental Department at NAT headquarters; The SDO will work closely with the Project manager on site and with a communication person assigned to document and develop different communication dynamics and events. He/ she will be the ultimate SEP responsible.

6 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

The type of information disclosed and the specific method of communication to be undertaken by NAT for the Project are summarized in Table 6-1 below. The objective of engagement is to provide local communities that are directly affected by the Project and interested stakeholders with access to timely,

relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

Information disclosure and stakeholder engagement are the cornerstones of managing the social impacts of project and fundamental principles of the lenders' Environmental and Social Policy (ESP) and Access to Information Policy (AIP). Mandatory restrictions and social distancing measures associated with Covid-19 in the economies where the lenders invests, rule out some traditional consultation approaches in the short term. Abou Qir project at a stage of active engagement with stakeholders therefore need to develop alternate plans, taking account of mandatory, national Covid-19 restrictions and social distancing (for more details see Appendix 4: Stakeholder Engagement (PR10) EBRD briefing note COVID-19, 15 April 2020)

Table 6-1: Stakeholder Engagement Program

Stakeholder	Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
Primary Stakeholders						
Potential Affected Communities	Residents and commercial activities in the communities within the project area	Meeting in their location/or at the stations/ level crossings Public consultation session Post Mail Email Construction signs and warnings Leaflet distribution NAT's Website Postal and online questionnaires and feedback forms Premises of different entities at the central and local levels, as well as in public places and local government units Media and Social media A number of key informant interviews and focus group discussions will be conducted via phone and/or remote communication tools due to the circumstances surrounding the Covid-19 pandemic.	<ul style="list-style-type: none"> - Project Non-Technical Summary, ESIA, RF,RAP , SEP, ESMP ESAP - Schedule of preparation and construction - Outline of construction and operation environmental and social impacts and proposed mitigation measures - Compensation Implementation and Livelihood Restoration Plan - Regular updates of key information, especially the information related to any design change that is likely to materially change its environmental or social risks and impacts, notably unanticipated land acquisition - Seek feedback on changes, for example alternative methods to access the grievance mechanism 	<ul style="list-style-type: none"> - Employment opportunities - Familiarize local communities with company's policies - Provide access to grievance mechanism - Address complaints in a transparent and appropriate manner - Project implementation schedule - Construction activities details including utilities and traffic diversions 	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	<ul style="list-style-type: none"> - NAT Project Management Unit (PMU) - Environmental Department NAT - Environmental and Social Officers - Contractors, Site Engineers - Cooperation with NGOs
	Local communities near to the Metro line, new stations and depot areas, as it is the main construction site.					
	Communities near the main crossings.					
	job seekers					
	users of the present and future pedestrian crossings					
	Road users					
	Future metro users					
	Train users, including Female					
Street vendors						
RoW users						
Vulnerable groups						
Secondary Stakeholders						
Environmental Sector	Ministry of Environment - Egyptian Environmental Affairs Agency (EEAA)	Public consultation session Face-to-face meetings, official communication Formal Meetings Post mail Fax	<ul style="list-style-type: none"> - EIA: anticipated impacts and mitigation measures - Environmental register - Project Non-Technical Summary, ESIA, RF,RAP , SEP, ESMP and ESAP - Regular updates of key information, especially the information related to any design change that is likely to materially change its environmental or social risks and impacts, notably unanticipated land acquisition - Seek feedback on changes, for example alternative methods to access the grievance mechanism - Compliance reports with the national environmental requirements. 	<ul style="list-style-type: none"> - Obtaining environmental approval complying with Law 4/1994 - Complying with Law 4/1994 	<ul style="list-style-type: none"> - Prior to construction - Bi-annual 	<ul style="list-style-type: none"> - Environmental Department NAT - Environmental and Social Officers
	Environmental Office within the Governorate	Formal Meetings Post mail Fax				
Line ministries	Ministry of Finance	Fax Post Mail	<ul style="list-style-type: none"> - Schedule of preparation and construction 	<ul style="list-style-type: none"> - Non-technical Summary of ESIA 	<ul style="list-style-type: none"> - Before project appraisal 	

Stakeholder	Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
	Ministry of International Cooperation	Email Formal meetings, official communication		Arabic and/or English	- Prior to and during construction - During operation	- NAT Project Management Unit (PMU) - Environmental and Social Officers
Local Governmental Entities Alexandria Governorate	Local units in the Governorates (District)	Fax Post Mail	<ul style="list-style-type: none"> - Schedule of the project phases pre construction and operation - Environmental and Social Management Plan - Compensation Implementation Plan - Traffic diversions plans - Utilities diversions plans - Street rehabilitation plan - A plan to implement new projects to avoid traffic crisis during construction (if needed) - Project Non-Technical Summary, ESIA, RF,RAP , SEP, ESMP and ESAP - Regular updates of key information, especially the information related to any design change that is likely to materially change its environmental or social risks and impacts, notably unanticipated land acquisition - Seek feedback on changes, for example alternative methods to access the grievance mechanism 	Arabic	- Prior to and during construction	- NAT Project Management Unit (PMU) - Site Engineers - Environmental and Social Officers
	General Authority for Roads, Bridges and Land Transport	Email Formal meetings, official communication				
	Alexandria Passenger Transportation Authority (APTA)	Site visits Communication tools due to the circumstances surrounding the Covid-19 pandemic.				
	Sanitation Directorate	Public consultation session				
	Alexandria Water Company					
	Telecommunications					
	Traffic General Directorate					
	Alexandria Antiquities Directorate					
	Urban Planning					
	Electricity Transmission Company					
	Health Directorate					
	Local Labour Offices	Fax Post Mail Email Formal meetings, official communication	<ul style="list-style-type: none"> - Bi-annual health and safety statistics - Employment needs and opportunities 	Arabic	- Bi-annual	- Environmental and Social Officers
NAT Workforce	National Authority for Tunnels (NAT) Ministry of Transport	Email Bulletin boards Staff meetings Fax In addition to the previous methods NAT will use communication tools that match the precautionary measures associated with the circumstances surrounding the Covid-19 pandemic, such as; SMS	<ul style="list-style-type: none"> - Schedule of the project phases of construction and operation - Environmental and Social Management Plan - Address the grievance mechanism - Annual E&S Performance Report - Compensation Implementation Plan - Construction Plan - Contractor and technical consultant agreements 	Arabic	- Prior to and during construction	- NAT Project Management Unit (PMU) - Environmental and Social Officers

Stakeholder	Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility	
	Letters Virtual meetings Video messages Webinars						
Other Governmental Entities	The Egyptian General Authority for Land Survey (head quarter and Alexandria Directorate)	Fax Post Mail Email Formal meetings, official communication	<ul style="list-style-type: none"> - Schedule of the project construction and operation - Address the grievance mechanism - RAP Implementation - Construction Plan - Project Non-Technical Summary, ESIA, RF,RAP , SEP, ESMP and ESAP - Regular updates of key information, especially the information related to any design change that is likely to materially change its environmental or social risks and impacts, notably unanticipated land acquisition 	Arabic	<ul style="list-style-type: none"> - Obtaining required permits - Reveal the project's progress and updates - Construction activities details including utilities and traffic diversions 	<ul style="list-style-type: none"> - NAT Project Management Unit (PMU) - Site Engineers - Environmental and Social Officers 	
	Egyptian National Railways (ENR)						
	Ministry of the Business Sector						
	Ministry of Endowments (Awqaf)						
	Ministry of Interior						
Contractors/suppliers Workers	Contractors not identified yet	Email Bulletin boards Fax Contracts Company's website Site visits In addition to the previous methods NAT will use communication tools that match the precautionary measures associated with the circumstances surrounding the Covid-19 pandemic, such as; SMS Letters Virtual meetings Video messages Webinars	<ul style="list-style-type: none"> - Schedule of the project phases of construction and operation - HR Policy - Environmental and Social Management Plan - Familiarize workforce with company's policies - Address the grievance mechanism and how to access it - Working Hours - Annual E&S Performance Report - Codes of conduct - Bidding documents - Awarded documents 	Arabic and/or English	<ul style="list-style-type: none"> - Familiarize workers with the policies and regulations - Follow the guidelines of NAT's environmental and social system (ESMS) - Handle complaints in a transparent and inclusive manner - Avoid violations of Egyptian environmental and social laws and regulations - Address complaints in a transparent and appropriate manner 	<ul style="list-style-type: none"> - NAT Project Management Unit (PMU) - Site Engineers - Environmental and Social Officers 	
Project lenders	EBRD, EIB, AFD, AIIB	Company's website Email Meetings Telephone Teleconference	<ul style="list-style-type: none"> - Reporting on updates and progress - Major incidents/ non-compliances with EBRD ESP (2019) - NTS, ESIA, RF, RAP,ESMP, and ESAP - Design Change Management Procedure (DCMP) - Annual E&S Performance Report 	English	<ul style="list-style-type: none"> - Meet the Environmental and Social Policy requirements - Meet the monitoring and reporting requirements of the EBRD 	<ul style="list-style-type: none"> - Bi-annual - In case of major incidents and non-compliances - During operation 	<ul style="list-style-type: none"> - NAT Project Management Unit (PMU) - Environmental and Social Officers

Stakeholder		Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
Service Providers/ Local Business Owners	Private companies Traders (small-scale stores) (unofficial suppliers)	Formal Meetings Contracts Telephone Brochures Company's website Fax	- The facilities and amenities needed to be provided for NAT workforce	- Contracting with different local suppliers/ shop owners for food and potable water to be provided on site during working hours	Arabic	- Prior to and during construction - During operation	- Site Engineers - Environmental and Social Officers
Civil Society	Local NGOs Associations (CDAs) Grassroots Community-Based Organizations (CBOs)	Email Workshops Surveys	- These organizations can also influence the views of others regarding the project, nationally and internationally. - Responsible of sharing information with the community - In the case of this project it may be useful to engage specifically with NGOs and CDAs focusing and women related issues as well as persons with disabilities.	- Provide access to grievance mechanism - Non-technical Summary of ESIA - Project implementation schedule - Subprojects activity details including climate change mitigation benefits of railway - Resettlement Plan prepared - Employment opportunities	Arabic	- Prior to and during construction - During operation	- NAT Project Management Unit (PMU) - Site Engineers - Environmental and Social Officers
Media	Local media Online journalism TV	Company's Website Newspapers Online Social Media Platforms Newsletters Brochures TV/Radio broadcasts	- Disclose project design plans - Share construction progress and any other updates - Publish high-level project's environmental and social impacts and mitigation - key information on any design change that is likely to materially change its environmental or social risks and impacts, notably unanticipated land acquisition	- Communicate the different environmental and social impacts and mitigation measures of the project - Reveal the project's progress and updates - Construction activities details including utilities and traffic diversions	English and/ Arabic	- Prior to and during construction - During operation	- Public Relations Department NAT - Environmental Department NAT

7 GRIEVANCE MECHANISM

7.1 Objectives

The objective of a grievance mechanism procedure is to ensure that all comments and complaints from any project stakeholder are considered and addressed in an appropriate and timely manner.

Both NAT and contractors must be committed to avoiding, reducing, limiting and, if necessary, remedying any adverse impacts caused by their activities on local populations and on their social and physical environment. One of the tools for identifying, preventing and managing unanticipated impacts is a Grievance Mechanism (GM).

The grievance mechanism will deal with suggestions, concerns, and grievances related to any issues arising from Project specific activities. The grievance mechanism is not designed to obstruct access to other judicial or administrative processes that are available under Egyptian law.

7.1.1 NAT Current Grievance Mechanism

NAT has an existing Grievances Mechanism. The process of receiving and managing grievances is shown in Appendix 2.

The Current grievance mechanism is a participatory tool for the internal and external stakeholders, while it is a mandatory process for NAT. The procedure described in this document is extended to communities, all workers onsite, including permanent workers, casual workers, service providers, consultants, suppliers, subcontractors and external stakeholders, accessible to all workers, and at no cost and without retribution.

Although there are grievance mechanism for workers at the construction site (related to the contractor and is supervised and monitored by NAT), NAT's complaints channels are available to all parties concerned with the project.

7.2 Institutional Responsibility for Grievances

The entity responsible for handling grievances will mainly be the **Grievance Committee** within the implementing agency (NAT/ PMU)

- The Grievances Committee receive the complaint
- The Grievances Committee directs the complaint to the concerned department or to the engineering department for investigation
- The complaint and the investigation report are routed back to the grievances committee, where a report is prepared and raised to the decision-making authority
- Document all received grievances
- Document, report and disseminate the outcome of received grievances
- Ensure that each legitimate complaint and grievance is satisfactorily resolved by the responsible entity
- Monitoring grievance redress activities.

PMU working within NAT in cooperation with the Contractor will address all grievances raised by community members, particularly the ones related to resettlement activities.

Assigning a responsible person or a team to handle the resolution of grievances is part of GRM related to IFIs Requirements. Creating a timeframe where the aggrieved person has been acknowledged the receipt of his/her grievance with a pledge of a required resolution; in addition to maintaining confidentiality, will result in amicable implementation of the project.

7.3 Grievance Tiers

The proposed mechanism is built on two tiers of grievances:

First tier of Grievances: project level (on Site)

The Project Manager on site (contractor) is responsible to ensure that the GRM system is widely promoted 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 an effective resolution should be 10 days from receiving the grievance and The E&SDOs should inform the complainant of its outcome.

The project developed a mechanism for handling project-level complaints and grievances with the aim of ensuring that project related complaints are addressed in a timely and transparent manner. The project GM is designed to accept grievances from all project stakeholders.

Grievances are documented through the grievance log, which is designed for project to ensure documentation and follow-up (see **Error! Reference source not found.** & Register). During construction the contractor is responsible for receiving, following up and resolving complaints, and NAT is responsible for monitoring.

Second tier of Grievances: On the level of NAT headquarter. If the aggrieved person is not satisfied with the decision of the first tier, he can raise the complaint to the NAT headquarter.

7.4 Grievance Channels

The following are the main channels through which grievances will be received:

- Engineering representative on-site: It has not been identified yet
- NAT Website: Contact Us
- Direct mail to the Chairman of NAT: chairman@nat.org.eg
- Planning Department: pld@nat.org.eg
- Telephone calls (Landline): +20225743070
- Hotline: (16528) There is no hotline except for general Government Complaints
- Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466
- The Government Complaints/ Portal: www.shakwa.eg

All grievances should be addressed to the focal point whose contact details are as follows:

Ms. / Eng.: Magdy Madany

Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466

Telephone: +20225742968

Email: magdymadany@hotmail.com

The following paragraphs describe a grievance mechanism that is consistent with previous levels and IFIs requirements

- **Grievance Cycle**

As part of the Metro project implementation, project-level grievances will follow the following cycle. Complainants have the full right to submit their grievance to any of the project-level as well as institutional level channels. While the institutional GM (described below) has not been used by the project yet, linkages will be established.

- **Response to Grievances**

A best practice standard is to acknowledge receipt of complaints within 2 calendar days and to respond complaints, within a maximum of 10 working days. This is also applicable for cases that do not need any corrective action. For complaints that will be resolved in a longer period due to their complexity, the following steps will be considered:

- The aggrieved person has to be informed of the proposed corrective measure within a maximum of 10 days.
- Implementation of the corrective measure and its follow up have to be communicated to the complainant and recorded in the grievance register.

Response will be made either verbally or in writing, in accordance with the preferred method of communication specified by the complainant.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant. Comments will be reviewed and taken into account in the project preparation; however, they may not receive an individual response (unless it is required). Complainant, through the use of the complaint tracking number, can follow up on their complaints through a range of methods including postal mail, e-mail, phone, customer service, and/or project location.

- **Confidentiality**

Individuals who submit their comments or grievances have the right to request anonymity, although this may render the Social Specialist unable to provide feedback on how the grievance is to be addressed. Confidentiality should be declared during the process of disseminating GM information. The aggrieved person can stay anonymous but still reachable by phone number or any channel of communication preferred.

- **Management of GM**

During construction and operation phases, grievances in relation to construction activities will be managed by the social specialist of the PMU. With regard to complaints submitted through the Institution level channels, direct communication will take place with the social specialist of the PMU.

- **Monitoring of Grievances**

All grievances should be monitored by the ENR in order to verify the process. Monitoring will be carried out for the following indicators:

1. Number of monthly received grievances (disaggregated by channel, gender, age);
2. Number of grievances resolved;
3. Number of unresolved complaints;
4. Timeframe for resolving complaints;
5. Number and type of dissemination activities implemented;
6. Number of complainants responded in a satisfactory manner;
7. Timeframe for responding to complaints;
8. Dissemination activities implemented;
9. Level of satisfaction with solutions;
10. Documentation efficiency.

Quarterly Grievance Monitoring Report should be developed to keep track of all grievances submitted. The quarterly reports should include an analysis for the above-mentioned indicators. Moreover, main findings and analyses should be documented in annual report

- **Disclosure of grievances**

Grievance channels should be disclosed as well as an annual report analyzing the received complaints should be prepared. The annual report will include as indicated previously the above-mentioned indicators. Moreover, any disclosed grievances will be kept anonymous and/or only the annual report will be disclosed.

- **Gender Sensitive GM**

The project grievance mechanism will be gender-sensitive. It is a standard of good practice that aims to provide a separate female contact point for complaints to be received from women.

In case of receiving any SEA/SH complaints, they should be carefully handled following the key principles of confidentiality and survivor's consent. A female social officer should be assigned to manage SEA/SH complaints and should be trained on dealing with SEA/SH issues. The female social officer should communicate with the aggrieved person (survivor) in the same day of receiving the complaints to verify and acknowledge the complaint and get the survivor's consent on the next steps including potentially referring the case to a specialized support entity in case the survivor prefers so. The time interval should not exceed two working days maximum for referral of complaint. The contacts of the qualified female social officer should be shared with the local communities as well as other GRM channels. It should be made clear that anonymity and confidentiality and consent of the complainants/survivors will be ensured for any complains that will be channeled through the female social officer.

Any steps for escalating the complaints related to SEA/SH or referring them to any third party (e.g. police department and the court) should be made only under the consent of the survivor.

8 MONITORING AND REPORTING

The SEP will be regularly revised and modified when needed throughout the project's different phases of construction and operation. Thus, this would help ensuring the adequacy and validity of the information presented, in addition to identifying proper ways of engagement in accordance with the legislative requirements and standards set by NAT. Any modifications taking place in the activities undertaken by NAT shall be documented in the SEP. The SDO will work closely with the Project manager on site to implement the stakeholder engagement plan activities related to the site in Alexandria Governorate through periodic reports, meetings and site visits; but the SDO will be the ultimate responsible.

The SDO will gather a quarterly summary for the Project's Implementation Unit on all the engagement activities organized by NAT during the reporting period. This report will contain:

- Summary of all engagement activities with different stakeholders such as surrounding communities, PAPs, entities, and NGOs.
- Summary of communication activities held with authorities and the reason behind them
- Summary of press statements released and other statements shared with media outlets regarding the company or the project.
- Number of grievances received their nature, how they were tackled or the progress of their resolution, and whether there are measures that were agreed to be taken.

NAT will create a biannual report to report and assess the ongoing environmental and social performance, which include a description of the consulting, and communication activities that took place and the efficiency of the grievance mechanism.

9 RESOURCES AND RESPONSIBILITIES

Implementation of this SEP is the responsibility of the SDO and the Environmental Department in NAT HQ who will be accountable to do the following:

- Answering different queries and issues raised by different stakeholders. Moreover, sharing updates and responses of actions taken to ensure grievances closure upon mutual satisfaction;
- Frequent monitoring of practical use of the grievance mechanism and whether any changes need to take place;
- Making sure permits and approvals are done in a timely fashion from different authoritative entities;
- Creating online content for the public to access over NAT's website;
- Arranging public consultations if needed;
- Communicating with different regional and local media outlets to monitor news and updates related to the company or the project and its progress;
- Participating in the annual report preparation and social action plan execution; and
- Ensuring the regular implementation of this SEP and any needed updates;

Any contact information related to the company such as phone numbers, email addresses, and physical addresses of the head office, will be made available to the main stakeholders.

The SDO and Environmental Department NAT HQ are also responsible for handling and collecting grievances and different communication events with communities, PAPs and workers. Their contact details will be made available and accessible to all stakeholders, regardless of their status.

10 APPENDICES

APPENDIX 1: STAKEHOLDER CONSULTATION AND ENGAGEMENT DURING THE ESIA PREPARATION

The consultant conducted site visits to stations (16 stations) and railway level crossings (14 crossings); in order to limit the economic activities within the stations. A random sample was selected to conduct scoping consultation activities, and the sample came as follows:

Summary of the scoping consultation activities that were conducted in project area

Stakeholders		Number		Method
		Males	Females	
Potential PAPs	Tenants of the kiosks inside the stations	10	-	Interviews
	Squatters: Informal economic activities inside the train corridor	11	1	Interviews /FGDs
Street vendors Outside the railway track		12	7	Interviews /FGDs
Railway users		59	32	Interviews / FGDs
Community members and shop owners surrounding the project areas		55	39	scoping sessions/ FGDs
Imams of mosques which will be removed		12	-	Interviews
Governmental Authorities Alexandria Governorate		-	9	Interviews / Meetings
NGOs		1	3	
ENR - MOT		5	-	Meetings
NAT		3	1	Meetings
Total		168	92	

The results of stakeholder engagement

The following table presents all stakeholder engagement activities conducted by the Consultant and the key outcomes obtained

Key comments and concerns raised during the consultations

Stakeholder	Key Outcomes
Governmental Authorities Alexandria Governorate	<p>Governmental agencies made clear their strong cooperation with the project and the consultant, especially the authorities responsible for converting the utilities (water, sewage, electricity, communications ... etc.), as they consider the project a major civilizational move for Alexandria Governorate.</p> <p>Officials at the Roads Directorate and the General Traffic Department emphasized the importance of developing effective traffic plans before the start of construction. So that the project does not have significant impacts on traffic and increase the burden on the existing road network.</p> <p>The officials of the Directorate of Antiquities stressed the importance of coordination before the start of construction with a sufficient period of time to survey the excavation sites, and not to disrupt construction.</p>

Stakeholder	Key Outcomes
	<p>Alexandria Water Company officials explained that the stage of converting the utilities will be a good opportunity for the company to renew the existing facilities in the project areas. It must also be emphasized that all crossings conflict with the existing lines of the water network. The head of the water company also added that consideration must be given to the impact of electricity for operating the project on the existing utilities, and therefore the distance between them must be taken into account.</p> <p>All officials emphasized the importance of preparing a specific schedule for construction and time periods required to converting the utilities; In order for local communities to be notified through the local media in the governorate.</p>
<p>Railway users</p>	<p>Railway users, both males and females, explained that the train is a major means of transportation for them. Despite the difficulties they sometimes face in getting on the train, it is the most appropriate means of transportation for them, due to:</p> <p>The cost of the train ticket is low and suitable for a large number of individuals; School and university students, the elderly, women selling in the markets.</p> <p>Some indicated that the train is suitable as a means of family transportation, given the average cost of transportation for all family members,</p> <ul style="list-style-type: none"> – Railway users suffer from major problems, foremost of which are: <ul style="list-style-type: none"> • Frequent delay in train times, which sometimes reaches an hour, in some cases; this forces them to take another high- cost means of transportation. • During peak hours the train is very crowded and the rush to ride the train becomes a danger, especially for the elderly and women; which makes them wait for another train to avoid the overcrowding. • Some women explained that crowded situations create an unsafe environment for them, whether they are at risk of being harassed or at risk of being robbed. • Train Services: The number of trains has decreased over the years. There are too many passengers per train. The train stops operating at 11:00 pm, which limits transportation during the late hours. • Safety concerns: The doors remain open throughout the journey risking passenger safety. The train interacts with crossings that often lead to accidents with other forms as transportation such as tok toks. Frequent quarrels and fights between young passengers. Train security are not always available. The material (glass) being used for the windows is prone to breakages. Passengers smoke on the train. • Many train users are asking what the expected cost of ticket prices will be (will it be too expensive for good service). It is important to take into account the economic status of the current users of the train, as it is a popular low-cost means of transportation. • What alternative means of transportation will be provided instead of the train during the construction period? • The train schedule/route is not planned efficiently, with more trains allocated for one direction than the other. <p>The users of the train were very excited about the metro project because it would</p>

Stakeholder	Key Outcomes
	<p>provide a very safe and vital means of transportation for the Alexandria Governorate and wished that the project would be completed as soon as, and they wished to improve the level of service and regularity of the train at the specified times, so that the service becomes excellent.</p>
<p>The potential PAPs</p>	<p>The tenants of the kiosks and cafeterias inside the stations</p> <ul style="list-style-type: none"> – The stations include a limited number of economic activities which are limited to the tenants of the kiosks selling sweets and drinks, in addition to some cafeterias. – The consultant conducted interviews with all of them, they explained that their lease contracts are valid and their duration does not exceed one year. – They had questions about when the project would start and whether this would take place before the end of their lease contracts, and whether alternatives would be offered to them until the completion of the construction work at the stations. – None of them expressed their objection to the project, on the contrary, – they stressed the importance of a comfortable and safe means of transportation in Alexandria, especially that the train passes through very crowded areas. – They emphasized the importance of providing information about the Implementation dates before the start of the construction works in an adequate period. <p>The informal economic activities inside the train corridor</p> <ul style="list-style-type: none"> – The site visits indicated that there are some informal economic activities inside the train corridor, specifically near the crossings levels and pedestrian crossing openings. – These activities are selling vegetables, fruits, household appliances, used clothes, and a nursery that sells ornamental plants and flowers. – The owners of these activities are well aware that their status is illegal and that they have been removed several times, but they return again as they are allowed to enter the train corridor again. – The owners of informal economic activities asked some questions regarding what would happen to them; would they be allowed to park outside the railway for sale? – They also made it clear that they have not settled in this place for a long time because they move from one place to another because their status is unofficial.
<p>Street vendors at the crossings and inside the train corridor</p>	<p>Street vendors are spread at the crossings levels in the areas of Dhahriya, Sidi Bishr, Souq, Victoria, and Mamoura. They sell fruits, vegetables, fish, and baked goods etc.</p> <p>They can move from one place to another. They did not show their interest in the project and made it clear that they could park in any crowded place, such as bus stops, and at government offices and schools. Some of them also indicated that the construction period and the presence of a large number of workers will be a good opportunity for them to sell.</p>
<p>Community members and shop tenants surrounding the project areas.</p>	<p>Many surrounding residents explained that the train does not represent any inconvenience to them as it is part of their daily life, and the train stations in some areas represent a crossing point from one area to another. Trains for neighboring communities represent a major means of transportation, even for schoolchildren.</p> <p>Residents and shop owners stressed the importance of taking into account the impact of the project on traffic because these areas are very crowded and do not bear the crossings being closed, which will result in traffic crises that may continue throughout the construction period.</p>

Stakeholder	Key Outcomes
	<p>They also stressed their great admiration for the project because it will replace the train and become a modern and fast means of transportation, which could raise the price of buildings in the area. However, the important thing is not to remove any homes or facilities for the project to be materialize.</p> <p>Community members and shop tenants surrounding the project areas asked about the following:</p> <ul style="list-style-type: none"> • Will the metro ticket cost high versus the current train ticket? • When work begins on the metro construction, the current crossings will be closed. What are the alternatives to it, and when will it be implemented? • What alternative means of transportation will be provided instead of the train during the construction period? • The streets parallel to the current train route suffer from neglect and dumping of waste. Will they be improved in the project? Will there be coordination between the project managers and the local units in this regard?
<p>Imams of mosques which will be removed</p>	<p>During the site visits, the work team visited a number of mosques that will be removed for construction work in the project. All mosques are built on ENR properties.</p> <p>All mosques are built on railway properties, one of these mosques are closed for the time being.</p> <p>The consultant interviewed all imams' mosques.</p> <p>They all know about the project. They all confirmed knowledge that the mosques would be removed; Except for two of them in the Asafra and Victoria areas.</p> <p>They explained that the idea of removing the mosque for public benefit can be accepted by community members, but the important thing is to put forward appropriate alternatives; Because they do not know yet what are the alternatives for these mosques.</p>



Photos of the Consultation with citizens about the project in the Mandara tunnel area, in cooperation with officials in Alexandria Governorate

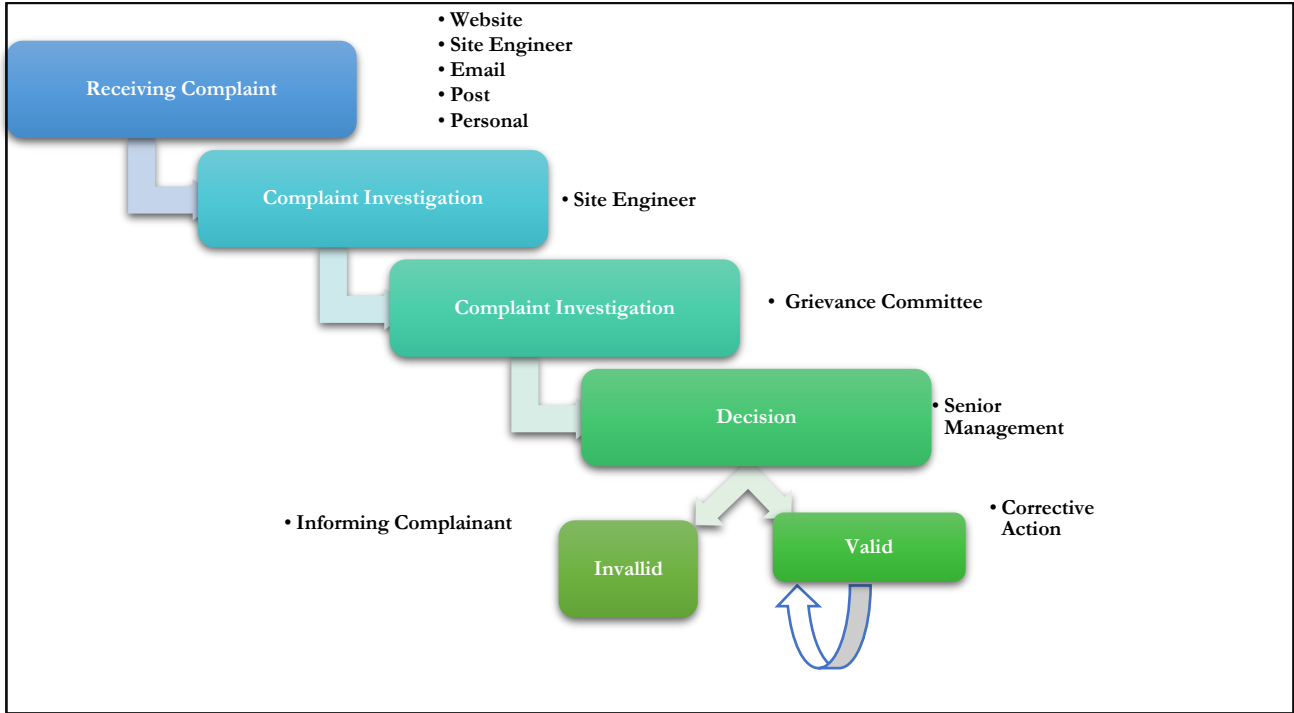


Photos of meetings and scoping sessions



Photos from consultation activities

APPENDIX 2: NAT CURRENT GRIEVANCE MECHANISM



NAT Current Grievance Mechanism (NAT 2021)

APPENDIX 3: SAMPLE GRIEVANCE FORM & REGISTER

□ **SAMPLE GM FORM**

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ I wish to raise my grievance anonymously (note in this case a response will not be provided) I request not to disclose my identity without my consent
Contact Information <i>Please mark how you wish to be contacted (mail, telephone, e-mail).</i>	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Arabic <input type="checkbox"/> English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	<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)
What would you like to see happen to resolve the problem?	
Signature: _____ Date: _____	
Please return this form to: [name], Grievance Mechanism Focal Point, [company name], Address : Tel.: _____ or E-mail: _____@_____.com.	

SAMPLE GRIEVANCE REGISTER

No.	Reference No.	Registration Date	Name of Complainant, Location and Contact Information	Gender	Occupation	Company & Site Location (if complainant is a Project worker)	Complaint Category	Details of Complaint	Frequency	Report of the Investigation	Resolution/ Management Status	How Was the Issue Resolved / Managed	Date Issued Was Resolved	Duration to Closure	Complaint Closure Signed Off by:
	Month-Year-Case Number	When was the grievance re-ported?	What is the full name of the complainant? Where are they from? What is their mobile number or email address?	Is the complainant a male or female?	What does he/she work?	What is the name of his/her company? Which site is he/she located on?	What is the category of the complaint?	How did he/she describe the complaint?	Is the complaint filed for the first time?	Did the focal point issue any investigation re-ports?	What is the current status?	How was the issue resolved by the focal point?	When was the case closed?	How long did take the focal point to close the case?	Who signed off the closure of the case?

APPENDIX 4: STAKEHOLDER ENGAGEMENT (PR10)

EBRD briefing note

15 April 2020



Advice to clients during the Covid-19 crisis: The Covid-19 pandemic has created significant environmental, health and safety and social impacts, risks and challenges for workforces across the economies where the EBRD invests, affecting businesses and their staff, contractors and suppliers. The EBRD has prepared briefing notes to highlight some critical areas of concern that clients may want to consider in their Covid-19 response planning, together with references to additional resources with further details on how risks can be mitigated or minimized.

This briefing note is not a compliance document and should be taken only as a source of information and analysis. It does not constitute medical or legal advice and is not a substitute for professional advice from international public health organizations such as the World Health Organization (WHO), national public health authorities and national governments, which should be consulted for qualified and more detailed information. We strongly encourage our clients to seek daily updates from these sources as the coronavirus pandemic evolves. No representation, warranty or undertaking, expressed or implied, is made in respect of any information contained herein or the completeness of the content of this briefing note, or any conclusion or judgements described herein. Certain parts of the briefing note link to external internet sites. No responsibility is accepted for the content of any external references.

Information disclosure, stakeholder engagement and Covid-19

Information disclosure and stakeholder engagement are the cornerstones of managing the social impacts of projects and fundamental principles of the EBRD’s Environmental and Social Policy (ESP) and Access to Information Policy (AIP). Mandatory restrictions and social distancing measures associated with Covid-19 in the economies where the EBRD invests, however, rule out some traditional consultation approaches in the short term. Projects at a stage of active engagement with stakeholders therefore need to develop alternate plans, taking account of mandatory, national Covid-19 restrictions and social distancing.

This note presents considerations for continuing effective information disclosure and stakeholder engagement during the Covid-19 pandemic and will be updated on an as-needed basis as the crisis and responses in our regions evolve. As each project context is unique, we recommend working with the EBRD’s Environment and Sustainability Department (ESD) to develop a tailored plan for your project.

Consultation approaches

Possible approaches for disclosing information and engaging with stakeholders are presented below, along with examples that could be considered.

Table 1. Alternate information disclosure and stakeholder engagement measures in light of Covid-19 restrictions

Type	Method	Examples	Engagement content
Information disclosure	Project leaflets	<ul style="list-style-type: none"> ▶ Information postcards ▶ Project impact and mitigation summaries 	<ul style="list-style-type: none"> ▶ Links to project documents and further information ▶ Overview of project, impacts and mitigation ▶ Frequently asked questions (FAQs)

	Email campaigns	<ul style="list-style-type: none"> ▶ Constant Contact ▶ Mail chimp ▶ Sendinblue 	<ul style="list-style-type: none"> ▶ Project updates ▶ Direction to feedback and grievance mechanisms
	Text-based messaging	<ul style="list-style-type: none"> ▶ WhatsApp 	
	Traditional media	<ul style="list-style-type: none"> ▶ Newspaper ▶ Radio ▶ Television ▶ Public address systems 	
	Engagement through local actors Signage	<ul style="list-style-type: none"> ▶ Local authorities ▶ Civil society organizations ▶ Worker organizations ▶ Community notice boards ▶ Information panels in community and at project site 	
Stakeholder engagement	Surveys and questionnaires (telephone, online)	<ul style="list-style-type: none"> ▶ Survey Monkey ▶ Survey Planet ▶ Type form 	<ul style="list-style-type: none"> ▶ Socioeconomic baseline surveys ▶ Feedback mechanism on project, impacts and mitigation
	Online engagement	<ul style="list-style-type: none"> ▶ Engagement HQ ▶ Social Pinpoint 	<ul style="list-style-type: none"> ▶ Environmental and social impact (ESIA) consultations ▶ Resettlement action plan (RAP) consultations ▶ Ongoing dialogue with stakeholders ▶ Transmission of questions, concerns and complaints
	Social media	<ul style="list-style-type: none"> ▶ Facebook ▶ Instagram 	
	Radio call-in shows	<ul style="list-style-type: none"> ▶ Dependent on local context 	
	Telephone engagement		

Processes, systems and tools

Information disclosure and stakeholder engagement require effective processes, systems and tools. These become even more important in ensuring effective engagement during

the Covid-19 pandemic. Some considerations include:

- ▶ Stakeholder database: reviewing existing stakeholder lists to ensure that key stakeholders and their contact information are included. This is critical for continuing engagement with stakeholders who are significantly impacted by a project, such as vulnerable people or those subject to economic and physical displacement. Local authorities, emergency services and medical providers and civil society groups can be of assistance in developing stakeholder lists. Consider

- ▶ Connectivity: limited mobile phone usage and internet connectivity can make electronic communication more challenging in some contexts.
- ▶ Literacy: variable levels of literacy among project stakeholders may reinforce the need for more oral and visual rather than written engagement channels.
- ▶ Cultural considerations: direct methods of engagement, such as telephone surveys, may not be appropriate in some cultural contexts.
- ▶ Language: online engagement tools may be lacking local language versions.
- ▶ Vulnerable people: vulnerable project stakeholders may be harder to reach using non-

if there are any new Covid-19 related stakeholders who need to be added to your list.

However, any effort to develop a stakeholder database must respect people’s privacy and be consistent with regulations such as the General Data Protection Regulation⁴.

- ▶ Messaging: when using a number of engagement platforms, it is crucial to ensure that information provided is clear, concise and consistent and is provided in relevant local languages.
- ▶ Documentation: keeping track of interactions requires effective documentation of engagement activities, commitments and complaints.
- ▶ Resources: ensure appropriate resources are in place to track and respond to queries, concerns and disputes or grievances that may be raised. With restrictions on movement, it is important that, where possible, staff managing stakeholder engagement and grievances can access systems and work remotely to enable processes to work effectively.

Developing an appropriate tailored engagement approach

Each EBRD project and every economy where the Bank invests is unique, requiring a tailored approach to information disclosure and stakeholder engagement during the Covid-19 pandemic. Factors to consider in developing an engagement plan include:

We recognise that while some consultation activities can be modified in the short term, others cannot and will need to be deferred until Covid-19 restrictions are lifted and social distancing eases. A short-term engagement plan can serve as a basis for discussion with the EBRD in order to implement a strategy that balances short-term engagement needs with

traditional engagement methods. Attention should be paid

to ensuring that an engagement strategy deploys approaches that specifically target these groups.

- ▶ Anonymity and risks of reprisal: the transparency of online engagement platforms can increase the risk of reprisals. It is therefore important to ensure that channels continue to be available for stakeholders to raise concerns, questions or complaints and have these addressed securely and/or anonymously.
- ▶ Government restrictions on social distancing and gatherings: Covid-19-related restrictions on public assembly differ throughout the economies where the EBRD invests. Engagement approaches therefore need to be tailored to comply with local restrictions and flexible as those restrictions are modified.

Preparing a revised short-term engagement plan

The EBRD’s Environment and Sustainability Department is here to advise you on how to tailor a Covid-19 engagement approach that is right for your project. For projects with significant planned stakeholder engagement and information disclosure in the coming months, we recommend preparing a short-term engagement plan considering alternate methods, including those outlined in this document.

long-term project planning. This is especially important for higher-risk and Category A projects. For these projects, the EBRD will work closely with its clients to develop a strategy for information disclosure and stakeholder engagement.

A simple template for this plan is proposed in Appendix A below for clients with existing operations.

Appendix A. Engagement plan templates

⁴ The General Data Protection Regulation (EU) [2016/679](#) (GDPR) is a [regulation](#) in EU law on [data protection](#) and privacy in the [European Union](#) (EU) and the [European Economic Area](#) (EEA). It also addresses the transfer of [personal data](#) outside the EU and EEA areas.

Two possible engagement plan templates are provided below. The first concerns stakeholder engagement regarding the Covid-19 pandemic and the client’s response it:

Table 2. Short-term engagement planning template: Covid-19-related engagement with example content

Stakeholder group	Key messages	Planned disclosure and stakeholder engagement	Proposed methods	Limitations
<i>Name of stakeholder group</i>	<i>Content</i>	<i>Engagement and disclosure activities planned in the coming three months</i>	<i>Proposed alternative short-term activities accounting for Covid-19 restrictions and social distancing</i>	<i>Limitations on activities</i>
EXAMPLE CONTENT:				
Workers	<ul style="list-style-type: none"> ▶ Amendments to site-operating procedures and emergency response plans (ERPs) ▶ Job security, changes to working conditions and guidance on accessing government benefits (if available) ▶ Actions to take if they develop Covid-19 symptoms 	<ul style="list-style-type: none"> ▶ Provide information updates; consult workforce on changes and seek feedback 	<ul style="list-style-type: none"> ▶ Email to all employees ▶ SMS ▶ Letters ▶ Virtual meetings ▶ Video messages ▶ Webinars 	<ul style="list-style-type: none"> ▶ Not all employees have email access ▶ Employees may be off sick
Emergency services	<ul style="list-style-type: none"> ▶ Confirmation of emergency contacts ▶ Amendments to site ERP and strategy ▶ Specific assistance needed, for example, in case of shutdown of operations 	<ul style="list-style-type: none"> ▶ Inform of changes ▶ Seek feedback 	<ul style="list-style-type: none"> ▶ Official email ▶ Teleconference ▶ Updated ERP submitted with changes highlighted 	<ul style="list-style-type: none"> ▶ Local emergency services may be close to full capacity
Health services	<ul style="list-style-type: none"> ▶ Location of specific centers for Covid-19 cases ▶ Opportunities for collaboration ▶ Identify areas where the company could assist (for example, in providing spare equipment, logistics support and so on) 	<ul style="list-style-type: none"> ▶ Seek latest information ▶ Consult on any opportunities to collaborate or support 	<ul style="list-style-type: none"> ▶ Telephone ▶ Tracking official information on websites 	<ul style="list-style-type: none"> ▶ Situation and information will change on almost daily basis; information may become outdated quickly
Transport providers	<ul style="list-style-type: none"> ▶ New site access procedures or timings ▶ Additional health and safety controls 	<ul style="list-style-type: none"> ▶ Inform of changes 	<ul style="list-style-type: none"> ▶ Official email or written letter 	

Local community	<ul style="list-style-type: none"> ▶ Support offered by project (for example, medical services, transport) ▶ Project measures to comply with social distancing ▶ Measures to limit workforce or community interaction (for example, for a large expatriate workforce) ▶ Changes to current procedures (for example, grievance mechanism) 	<ul style="list-style-type: none"> ▶ Regular updates of key information ▶ Seek feedback on changes, for example alternative methods to access the grievance mechanism 	<ul style="list-style-type: none"> ▶ Leaflet distribution ▶ Social media ▶ Website ▶ Newspaper advertisement ▶ Postal and online questionnaires and feedback forms ▶ Telephone calls 	<ul style="list-style-type: none"> ▶ Vulnerable people may be difficult to access with online mechanisms
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The second template concerns projects that have public consultation and stakeholder engagement activities planned and committed as part of project design (for example, ESIA preparation; ESIA disclosure and consultation; or resettlement planning). In these cases, a revised approach to stakeholder engagement, which takes account of the Covid-19 restrictions, should be developed. The table below provides a template for planning such alternative arrangements. In developing this template, clients should consider which activities are critical in the short term, and which should be deferred until Covid-19-related restrictions are lifted.

Table 3. Short-term engagement planning template – alternative approaches with COVID-19 restrictions in place – with example content

Stakeholder group	Key messages	Planned disclosure and stakeholder engagement	Proposed methods (short-term)	Limitations	Proposed alternative methods (long-term - deferred)
<i>Name of stakeholder group</i>	<i>Content</i>	<i>Engagement and disclosure activities planned in the coming three months - consider additional engagement related to the project's response to Covid-19</i>	<i>Proposed alternative short-term activities accounting for Covid-19 restrictions and social distancing</i>	<i>Limitations of short term activities</i>	<i>Proposed long-term activities to address limitations (to be implemented after Covid-19 restrictions are lifted)</i>
EXAMPLE CONTENT:					
Local residents in villages adjacent to proposed project, including vulnerable people	<ul style="list-style-type: none"> ▶ Project impacts and benefits, specific to the immediate area ▶ Construction and operational mitigation measures 	<ul style="list-style-type: none"> ▶ Disclosure and consultation draft: ESIA, NTS, SEP, RAP, environmental and social management plan (ESMP) and environmental 	<ul style="list-style-type: none"> ▶ Disclosure focusing on online methods, radio/TV/newspaper announcement ▶ Targeted leaflet drops house-to-house in village 	<ul style="list-style-type: none"> ▶ Short-term engagement may not reach vulnerable people 	<ul style="list-style-type: none"> ▶ Vulnerable people identified through discussion with local authorities ▶ Face-to-face,

Residents living along access roads	<ul style="list-style-type: none"> ▶ Project impacts and benefits, specific to the immediate area ▶ Construction and operational mitigation measures 	and social action plan (ESAP)	with contact details and mechanisms for returning feedback		one-to-one interviews or discussions
Physically and economically displaced households	<ul style="list-style-type: none"> ▶ Socioeconomic and asset surveys ▶ Compensation entitlements ▶ RAP consultations. 		<ul style="list-style-type: none"> ▶ Follow-up calls if contact details are available 		<ul style="list-style-type: none"> ▶ Engage prior to tender finalisation and prior to construction (additional mitigations can be identified)
			<ul style="list-style-type: none"> ▶ All of the above ▶ Telephone or online surveys 	<ul style="list-style-type: none"> ▶ The above ▶ Business and asset surveys when lockdown restrictions are in force and businesses are closed due to Covid-19 restrictions 	<ul style="list-style-type: none"> ▶ Face-to-face, one-to-one interviews and discussions ▶ Engage during development of the RAP

Appendix B. Further resources

While this note provides general information for EBRD clients, more resources on strategies for stakeholder engagement and information disclosure, including during the Covid-19 pandemic, can be found right⁵:

[IAP2 – How can IAP2A support your business practice during COVID-19](#)
[Meaningful Stakeholder Engagement: A joint publication of the MFI Group on ESS](#)
[EBRD Grievance Management Guidance](#)

[Note](#)

[World Health Organization–COVID-19- Communication and Community Engagement](#)

⁵ The EBRD is not responsible for the content of any external references