

Project Name:

ALEXANDRIA REGIONAL METRO – ABOU QIR to MISR STATION



Tender Title:

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Contract 1: Civil Works, Electrical & Mechanical, Signalling, Centralised Control, Telecommunication, Automated Fare Collection, Power Supply, Workshop Equipment, Track Works, ENR Tracks Diversion

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ABBREVIATIONS

ABBREVIATION	DEFINITION
AFD	Agence Française de Développement
AIIB	Asian Infrastructure Investment Bank
EBRD	The European Bank for Reconstruction and Development
EEAA	Egyptian Environmental Affairs Agency
EIB	European Investment Bank
ENR	Egyptian National Railways
ESIA	Environmental and Social Impact Assessment
HVS	High Voltage Substation
LRP	Livelihood Restoration Plan
MOT	Ministry of Transport
NGO	Non-Governmental Organisation
PAB	Project Affected Businesses
PAP	Project Affected Person
RAP	Resettlement Action Plan
RF	Resettlement Framework

GLOSSARY OF TERMS

TERM	DEFINITION
Compensation	Payment in cash or in kind for loss of an asset or a resource that is acquired or affected by the project.
Consultation fatigue	Too many requests for opinions, consultation meetings, focus groups, surveys and so on, which leads to affected people withdrawing their participation in the process.
Contingency	Unforeseen costs or situations which are not included in the Resettlement Action Plan budget.
Cut-off date	The date after which anyone who moves into the project area is no longer entitled to compensation and/or assistance. In practice, the cut-off date is usually the date of completion of the census of people and inventory of assets in the project-affected area, unless there are local legal provisions for another arrangement. Persons found occupying the project area after the cut-off date are not eligible to project compensation or other resettlement benefits. Similarly, fixed assets (such as built structures or crops) established after the cut-off date will not be compensated.
Displaced/project affected person (PAP)	Any person who, as a result of the land acquisition required by the project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Not all PAPs will need to move location due to the project.
Economic displacement	Loss of assets (including land) or access to assets that leads to loss of income or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources. People or enterprises may be economically displaced with or without experiencing physical displacement.
Expropriation	The process whereby a public authority, in return for compensation, requires a person, household or community to relinquish rights to properties (land and structures) that it occupies or otherwise uses.
Involuntary resettlement	Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition that will result in displacement. This occurs in cases of lawful expropriation or restrictions on land use based on eminent domain; and in cases of negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.
Land acquisition	Land acquisition includes both outright purchases of property and purchases of access rights, such as rights-of way.

TERM	DEFINITION
Livelihood	<p>A livelihood comprises the capabilities, assets</p> <ul style="list-style-type: none"> • Wages from employment • Cash income earned through an enterprise service • Rental income from land or premises • Income from a harvest or animal husbandry • Share of a harvest (such as various sharecropping) • Self-produced goods or produce used for • Self-consumed goods or produce • Food, materials, fuel and goods for personal common resources • Pensions • Various types of government allowances • Remittances from family or relatives.
Physical displacement	Loss of house/apartment, dwelling or shelter as a result of project requires the affected person(s) to move to another location.
Replacement value	<p>This is usually calculated as the market value of the asset plus transaction costs such as taxes, stamp duties, legal and notarization fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of property.</p> <p>Compensation at full replacement value is sufficient for the affected person to replace project-affected land, structures and other assets to the same or better standard in another location.</p>
Resettlement action plan	The document in which a client or other responsible entity specifies the procedures it will follow and the actions it will take to mitigate adverse effects, compensate losses and provide development benefits to persons and communities affected by an investment project.
Vulnerable or at-risk groups	<p>These groups include people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, may be more adversely affected by displacement than others and who may be limited in their ability to take advantage of resettlement assistance and related development benefits.</p> <p>Vulnerable groups in the context of displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities, communities dependent on natural resources or other displaced persons who may not be protected through national land compensation or land titling legislation. These groups should be identified through the process of environmental and social appraisal (see PR1).</p>

Source: Resettlement Guidance and Good Practice, Annex 1: Glossary of Terms

1. INTRODUCTION

1.1 The Project

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 the Phase 1 of the 3 phase Alexandria Metro Project (herein after referred to as the “Project”) to upgrade and electrify the existing railway line connecting downtown Alexandria and north-eastern Abou Qir into a high capacity metro system. Phase 1 of the planned Project routed between Abou Qir and Misr Station is the subject of this Resettlement Action Plan (RAP). Phase 2 and Phase 3 have not as yet been confirmed by NAT.

Historically, the original 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 railway line is transformed into a high capacity metro.

1.2 Project Need

The implementation of the Project design will result in temporary and/or permanent land acquisition as well as economic displacement. The applicable environmental and social requirements for the Project (collectively referred to as “Lender’s requirements”) are:

- EBRD’s Performance Requirement (PR) 5: Land Acquisition, Involuntary Resettlement and Economic Displacement;
- EIB Environmental and Social Standard (ESS) 6: Involuntary Resettlement;
- AIIB's ESS2: Involuntary Resettlement;
- World Bank Group Standard WB ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (which is adhered to by AFD);
- EBRD PR10: Information Disclosure and Stakeholder Engagement;
- EIB ESS10: Stakeholder Engagement; and
- WB ESS10 on Stakeholder Engagement and Information Disclosure.

1.3 Aims of the Project

According to the plan drawn up by the Ministry of Transport, the Project aims to reduce traffic congestion in the coastal city streets, improve the governorate’s existing infrastructure and align with Egypt’s national efforts to promote clean energy and climate action.

The existing Abou Qir railway line suffers from a lack of daily maintenance and the operation condition is generally poor which adversely influences the operating safety and efficiency of the railway line. The infrastructure and rolling stock are also in poor condition. The rolling stock for the existing railway line consists of 6 trains that operate along the railway providing a limited public transportation service to users. During peak times, a train service operates every 10 minutes taking about 50 minutes from Abou Qir to Misr. In the last few years, the train service has dramatically decreased from about 200 services to a little over 100 services daily greatly impacted the ridership, estimated at 71,000 passengers a day.

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1.4 Project Setting

Two transportation projects have commenced in the city of Alexandria; the first being the development of the Al-Raml tram line¹, with the second to establish a 43km metro line from Abou Qir in east Alexandria to Burg al-Arab to the west (the Alexandria Metro Project) at a cost of US\$2.5 billion².

The Project will be constructed in 3 phases, the first of which relies on the existing Abou Qir railway line corridor which extends for 21.7 km from Abou Qir to Misr station (the Project). It comprises a double track regional railway starting from Abou Qir connecting densely populated areas in the centre around Misr Station and the eastern parts of Alexandria city.

Phase 2 will begin at Misr Station routed to al-Max area at a length of about 8km, while the third and final phase extends from the al-Max area to the end of the line at a length of about 15.5 km.

The Project will run 6 km over a viaduct with the rest of the track will be at ground level.

Abu Qir Metro and Raml Tram Tracks

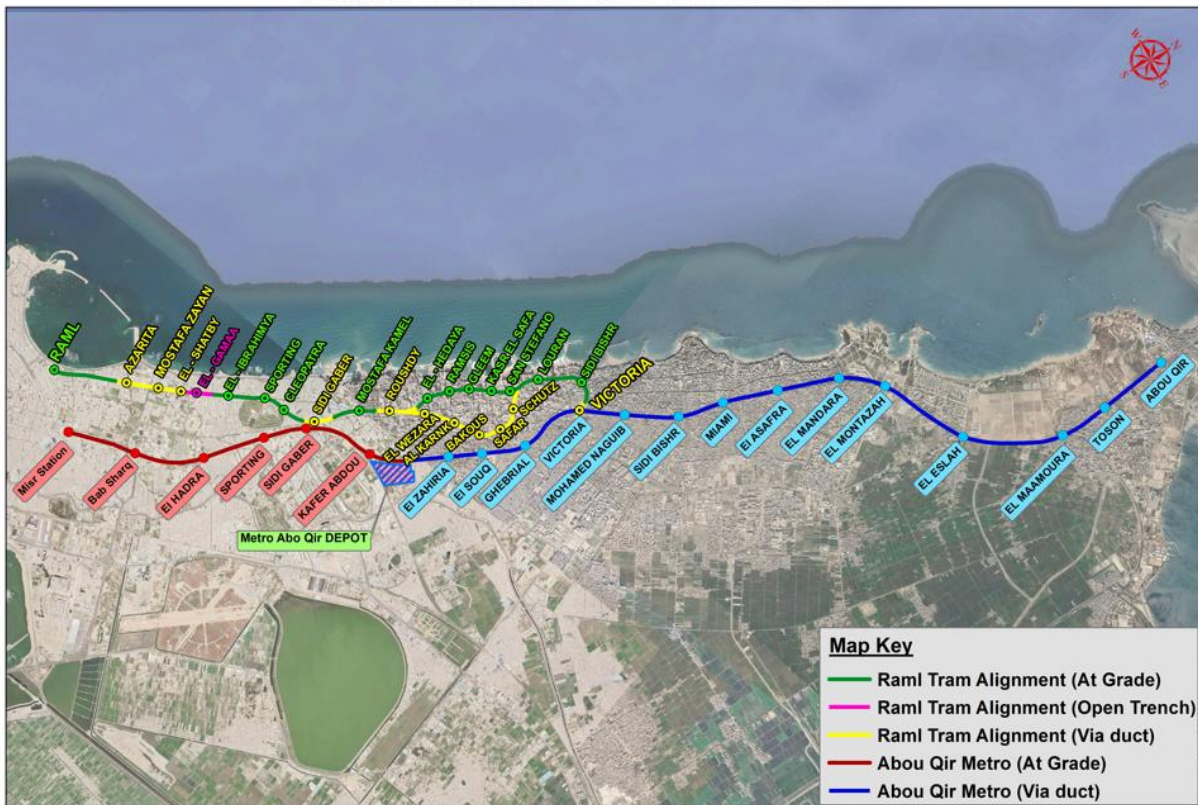


Figure 1-1 Alexandria Metro Project alignment and Raml Tram route.

¹ The Raml Tram Development Project is one of the projects of the National Authority for Tunnels, for which studies are currently being prepared. It is a stand-alone project and not part of the Alexandria Metro Project.

² <https://egyptindependent.com/alexandria-to-launch-its-first-surface-metro-project-at-2-5-billion/>

1.5 Project Categorisation

The Project has been assigned a Category A status in accordance with the EBRD Environmental and Social Policy (ESP) 2019 and PRs 2014. The categorisation as a Category A project means that a comprehensive Environmental and Social Impact Assessment (ESIA), including review of associated documents must be carried out, followed by the public disclosure of the ESIA for 120 days.

EIB categorises their projects based on applying the classification provided by Annexes I and II of the EU EIA Directive or relevant EU legislation and criteria qualifying for a social assessment. The Project falls under the classification described under Annex 2 Clause 10 Infrastructure (h) of the EU Directive as *“tramways, elevated and underground railways, suspended lines or similar lines of a particular type, used exclusively or mainly for passenger transport”*. This being the case, the national authority has to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the basis of thresholds/criteria or a case by case examination. However, the national authority must take into account the criteria laid down in Annex III of the EU Directive. The Project ESIA is a requirement of licensing in Egypt.

Under AIIB requirements, the Project is classified as Category A and as such an ESIA and Environmental and Social Management Plan (ESMP) is required and public disclosure is mandatory.

AFD has categorized the Project as ‘B+ - Substantial risk’.

As well as requiring the development of a comprehensive ESIA, this Category A Project also required the development of a RAP. This is due to the Project alignment necessitating the acquisition of land parcels from private owners and the physical and economic displacement of Project Affected Persons (PAPs)³. Details for the number of land parcels to be acquired and the PAPs impacted by the Project are described in **Chapter 6: Affected People and Assets**.

1.6 National Authority for Tunnels

National Authority for Tunnels (NAT) will be responsible for the construction of the Project and will be responsible for supervising the operation provided by a specialized operator which has not as yet been determined.

The Government of Egypt, through the NAT, will acquire all the land needed for the construction and operation of the Project. In addition, the implementation of the RAP falls under the responsibility of the project owner, NAT.

As per the loan agreements to be signed with Lenders, NAT is committed to complying with Lender’s Requirements, in addition to, the Egyptian law for this Project.

³ Project Affected Persons, or PAPs, are all persons impacted by the involuntary resettlement, including shops and mobile vendors in the right of way of the proposed alignment, in addition to landowners and informal users of land associated with the depot land and Bab Sharq and Sporting Stations.

1.7 Purpose of the RAP

It is a widely accepted fact, if the impacts of the Project are left unmitigated, involuntary resettlement under development projects may give rise to economic, social and environmental risks. The RAP has been based on the primary findings of the Resettlement Framework (RF) issued and included in the ESIA disclosure package in July 2021.

The purpose of the RAP is to establish the principles and procedures for identifying, mitigating and compensating the potential land acquisition induced impacts of the Project and to ensure that NAT's commitment with respect to land acquisition is in accordance with relevant national legislation as well as Lender's requirements. Furthermore, the RAP sets out mitigation and compensation measures for each of the impacted groups identified and outlines the organisational arrangements that may be needed during different phases of the Project. The RAP also describes the implementation plan in **Chapter 13: Implementation Schedule and Budget**, including a time schedule and a budget for implementation. **Chapter 12: Monitoring and Reporting** provides guidance on how the RAP implementation will be monitored and reported.

The mitigation and compensation measures will cover all PAPs and Project Affected Businesses (PABs) for the loss of land, properties, other immovable assets, including loss of livelihoods resulting from displacement and resettlement, as well as assisting these people in relocation and livelihood rehabilitation, where possible. This RAP considers formal landowners, in addition to, formal tenants, informal users, business owners and employees.

In line with this scope, the generic objectives of the RAP are to:

- Avoid or minimise involuntary resettlement, physical and economic displacement;
- Consider feasible alternative project designs to avoid or at least minimise displacement, while balancing environmental, social and financial costs and benefits;
- Mitigate adverse impacts on the use of the land and the access to land;
- Provide compensation for loss of assets at replacement cost; and
- Improve or, at a minimum, restore the livelihoods and standards of living for displaced persons to pre-project levels.

The specific objectives of the RAP are to:

- Outline the legal process and administrative procedures for the compensation of lost assets and livelihoods due to land requirements for Project activities and provide guidance to ensure compliance with applicable international best practices (Lender's requirements);
- Define potential land-based impacts and impacted people, businesses, communities and groups;
- Define the process of identification and evaluation of affected assets, livelihood losses and the value of compensation to replace the loss of assets and impacted livelihoods;
- Set out the eligibility criteria and compensation entitlement matrix according to type of losses that are anticipated at the preparation stage;
- In line with Project Stakeholder Engagement Plan (SEP), outline the communication strategy for land acquisition related matters and engagement with PAPs and communities;
- Define the approach for grievance redress pertaining to land acquisition and management of complaints in line with the Project SEP and Lender's requirements;

- Specify the requirements for public disclosure, public and local community involvement in the land acquisition process, including the development of a RAP;
- Ensure that the rights of vulnerable groups are considered and a gender-sensitive approach is adopted for land take activities to determine if any additional measures are required to avoid hardship for women or any vulnerable group category;
- Ensure regular monitoring of land acquisition related activities are carried out in a timely manner to inform management processes and to take immediate action when necessary; and
- Estimate a timeline and budget for implementing the land acquisition process under this RAP.

Regardless of the ownership and title of the impacted land, the RAP aims to provide compensatory measures to all impacted people and businesses. The scope of the RAP includes all the Project activities that require land take and shall apply to PAPs and PABs irrespective of their number, severity and magnitude of impact. Since resettlement often affects the most vulnerable and marginalized groups (economically, politically and socially), the RAP shall particularly focus on impacts related to these groups.

1.8 Structure of the RAP

The RAP will follow the below structure:

Table 1-1: Structure of the RAP

1. Introduction	Introduction to the Project and the RAP, presenting a brief description of the Project, the aim and rationale of the Project, Project location, Lender’s Categorization, description of the Project owner and RAP proposed structure.
2. Project Description	Description of the Project and alternatives considered to minimise physical and economic displacement, the Project footprint and land requirements and the proposed construction timeline.
3. Legislative Framework	Lender’s requirements and national and international resettlement legislation that is of relevance to the Project, including a gap assessment and measures to fill any gaps.
4. RAP Methodology	Description of the approach to RAP preparation followed by the methodology adopted for the socio-economic survey.
5. Affected People and Assets	The social baseline of the affected PAPs and communities, including the differing land uses of the land affected by the Project, and a summary of the public perception of the Project through a media search.
6. Project Impacts	Expected impacts/losses associated with the Project components/phases covered by the RAP, an explanation of all activities, identification of impacts on vulnerable groups and potential risks related to gender.
7. Land Acquisition Process and Principles	Land acquisition approach to be implemented for the Project and the procedures for the delivery of entitlements. Cut-off date for eligibility and eligibility of categories of displaced persons for compensation and other resettlement assistance.

8. Institutional Arrangements	The roles and responsibilities of all involved agencies/organisations, such as the NAT, Alexandria Governorate, Valuation Committee, Compensation Committee and other key actors, including coordination arrangements.
9. Entitlements and Compensation	Entitlements matrix addressing categories of losses and entitlements pertaining to the project components/phases in question. Description of the methodology for valuing losses to determine their replacement cost and compensation and assistance measures. Description of process for executing compensation and assistance.
10. Information Disclosure and Consultations	Description of the engagement timeline for land acquisition, consultation and disclosure of RAP, grievance mechanism and a Guide to Land Acquisition and Compensation.
11. Livelihood Restoration Plan	Description of proposed livelihood restoration measures to be implemented as part of the RAP to support the PAPs that will be economically displaced due to Project activities. This includes support to maintain and improve current economic activities, as well as provide alternative livelihood opportunities.
12. Monitoring and Reporting	Description of the internal and external monitoring and evaluation arrangements and presentation of monitoring indicators to measure inputs, outputs, and outcomes for resettlement/livelihood restoration activities.
13. Implementation Schedule and Budget	Implementation schedule covering all activities from preparation of the RAP through implementation, including monitoring and evaluation. Tables presenting expected costs and budget for all resettlement activities and sources of funds.

This RAP, which has been prepared to comply with Lender’s requirements, utilises information from the census and asset inventory carried out for this Project by NAT (2021) and information from further studies and designs that were prepared for the Project.

This RAP, supported by the Project’s **Guide for Land Acquisition and Compensation (GLAC)**, will be publicly disclosed by Lenders. The documentation will be revised, where appropriate, in response to any stakeholder comments received.

2. PROJECT DESCRIPTION

2.1 Overview of the Project

The Project comprises a 21.7 km metro line 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 is shown in **Figure 2-1**. Out of the 20 stations proposed for the Project, there is a total of 6 stations at grade and 14 stations elevated on the proposed viaduct. The Project duration for constructing the Project will not exceed 3 years.

The Project will comprise a dual track uninterrupted by level crossings. The description provided in this chapter, is based on the final design ⁴ of the Project.

⁴ Should any unanticipated changes to the design occur resulting in changes in land requirements, these will be addressed in a RAP update or addendum.

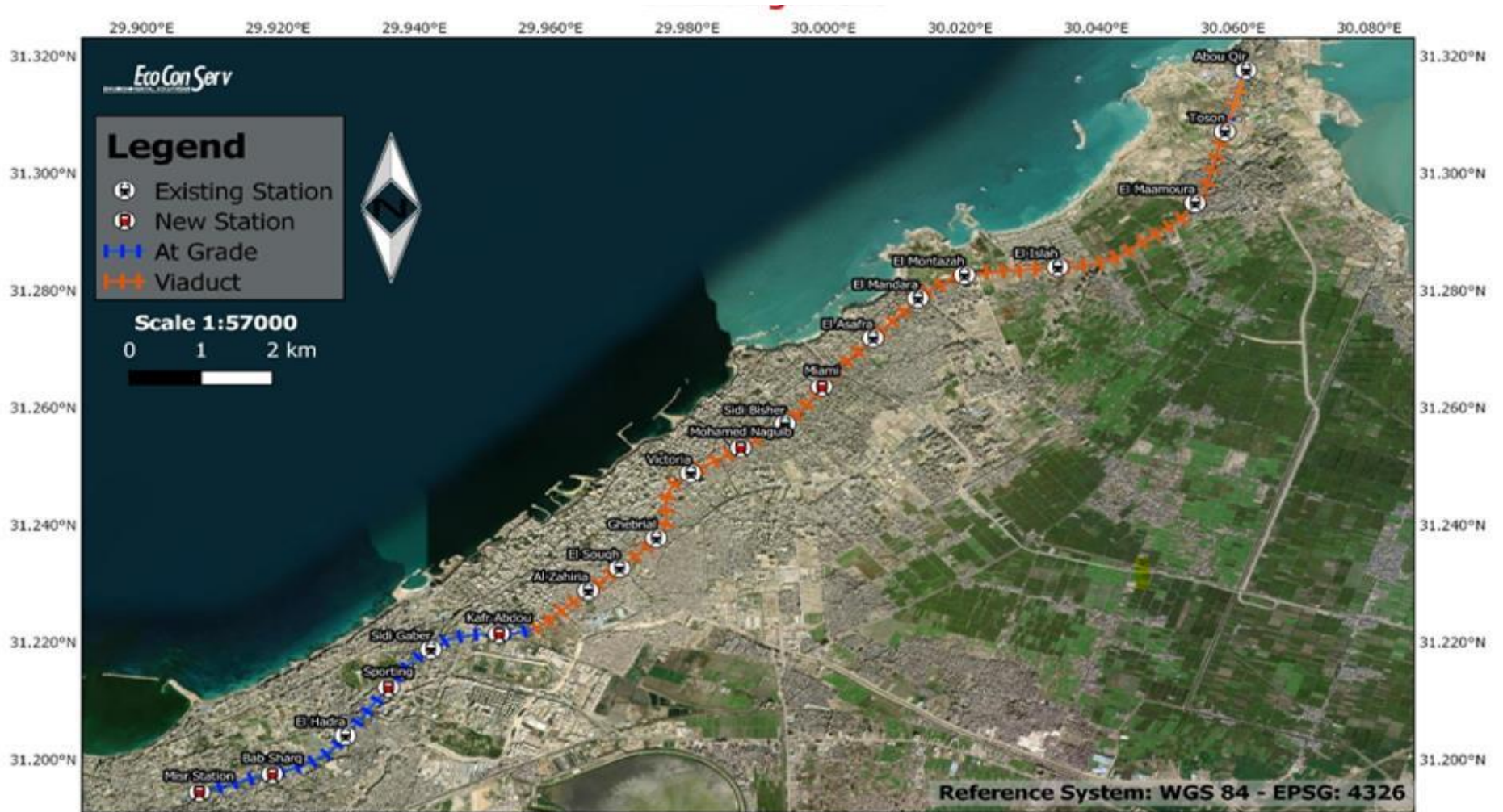


Figure 2-1 The full Project alignment.

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Alignment Sections

The Project’s alignment can be split into three sections based on the existing and proposed stations:

- **Section A** – Abou Qir to Sidi Bishr
- **Section B** – Sidi Bishr to Zahiria
- **Section C** – Zahiria to Misr Station

The division of the Project alignment into three sections is based on a number of important factors:

- The alignment characteristics of each section is unique. Section A from Abou Qir to Sidi Bishr has a consistent alignment as its width is relatively the same. Even though it also covers a viaduct, Section B is more congested (in terms of population density and land) and comprises a tighter alignment than Section A. Finally, Section C covers the at grade segment that borders the ENR corridor up to Misr Station.
- The impacts for each section differ, in terms of environmental and social impacts specifically in relation to air, noise, traffic, land, livelihood, infrastructure and underground utilities, structural integrity of buildings, etc.

Section A

The first section, Section A, starts at the Abou Qir Station and includes a total of 3 level crossings and 1 vehicle underpass. This section includes a total of 9 stations (Abou Qir, Toson, El Maamoura, El Islah, El Montazah, El Mandara, El Asafra, Miami, and Sidi Bishr) as shown in **Figure 2-2**. which will all be set on a viaduct.

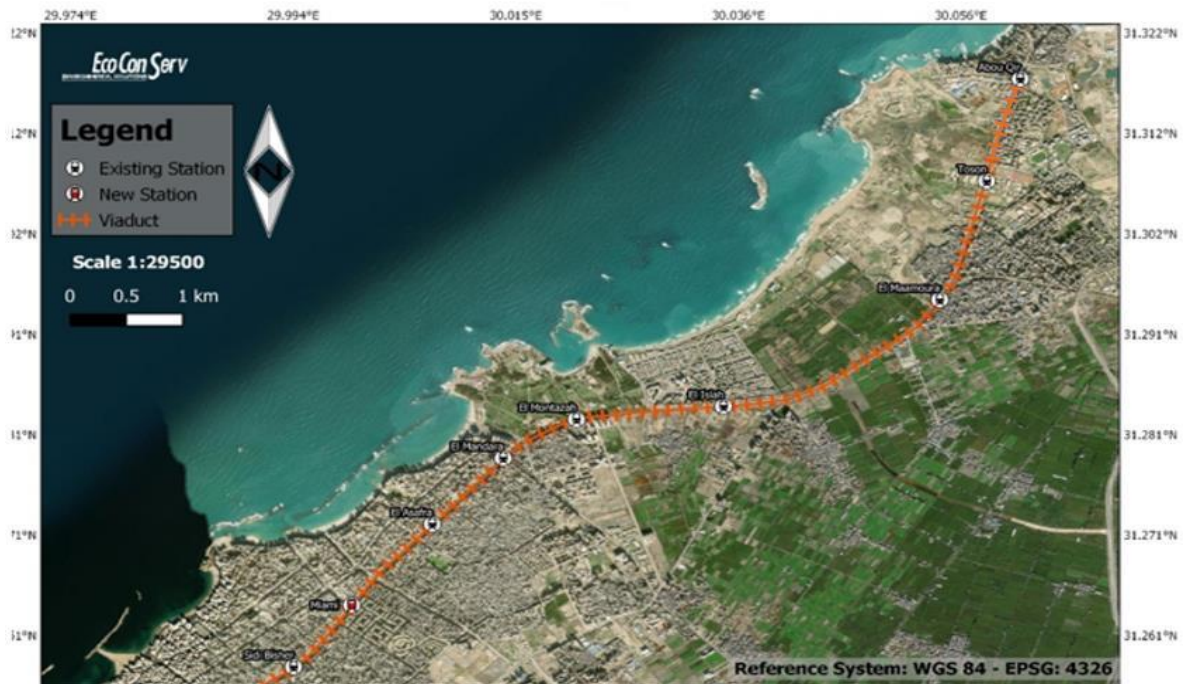


Figure 2-2 Section A profile.

Section B

The second section starts at the Sidi Bishr elevated metro station and ends at Al Zahiria station. It includes six stations (Sidi Bishr, Mohamed Naguib, Victoria, Ghebrial, El Souqh, and Al Zahiria) as shown in **Figure 2-3**. on the elevated viaduct.



Figure 2-3 Section B profile.

Section C

The final section starts at the transition between the viaduct from Section B to Section C and ends at the newly constructed Alexandria Station that will be located near the Misr train station. It includes 6 stations (Kafra Abdou, Sidi Gaber, Sporting, El Hadra, Bab Sharq, and Alexandria Station) as shown in **Figure 2-4**. The profile for this section is fully at grade except for the initial transition between the elevated viaduct to the at grade profile.

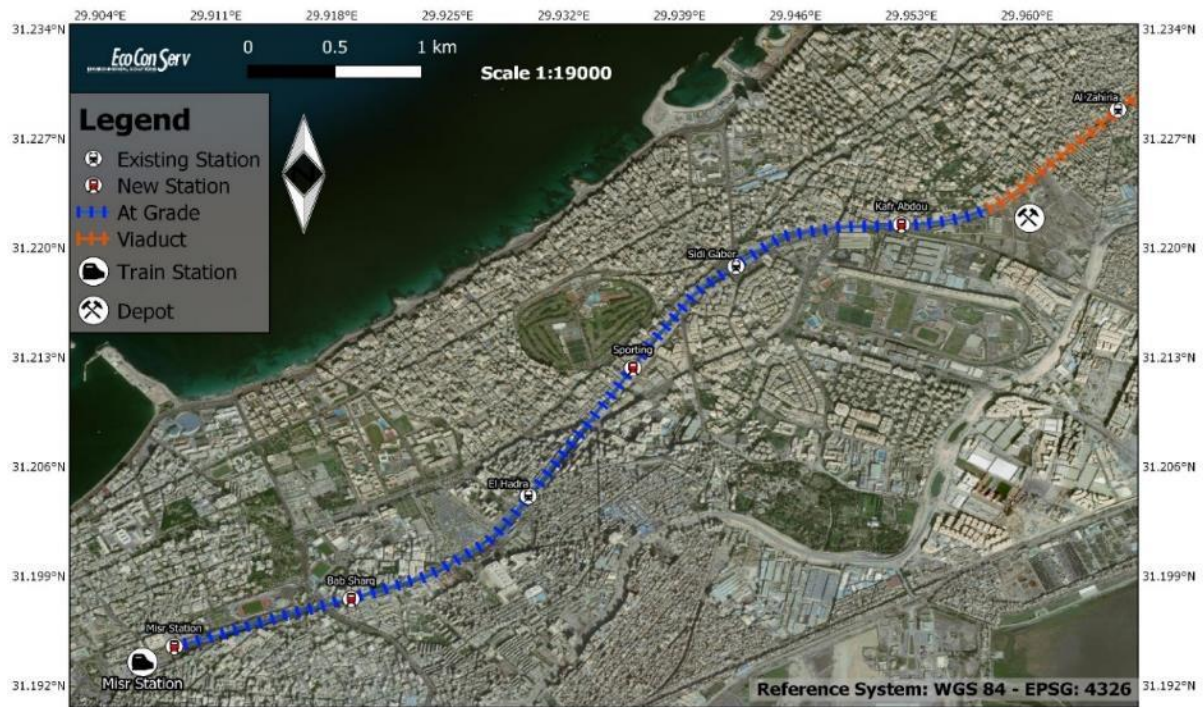


Figure 2-4 Section C profile.

Smaller scale maps of each section of the Project alignment that can be referenced are provided in **Appendix 1**.

The Project will be constructed entirely within the corridor of the existing Abou Qir trainline and there are no expansions or extensions that will be part of this Phase. Permanent and temporary land take for the Project is described in **Chapter 7: Project Impacts**. The construction works for the Project will be procured as an engineering procurement and construction (EPC) contract. The design includes the following structures and elements⁵:

Table 2-1: Project Structures and Elements (Phase 1)

Structures/ Project Elements	Specification/ Number
Structures	
Level crossings	11
Road Overpass	1
Road Underpass	8
Viaduct	The viaduct will be constructed following the proposed single column monopile approach to mitigate the need for extra land outside the existing corridor of the Project alignment. A total of 14

⁵ Vertical Alignment Report (Ref.99M-ACE-T1-TPL-RPE-GEN-0020-Rev.C) – 21/10/2020.

Structures/ Project Elements	Specification/ Number
	stations are planned to be elevated and constructed simultaneously with the viaduct.
Elements	
Decommissioning of the existing Abou Qir ENR railway line and its associated infrastructure including the stations.	16 existing train stations and infrastructure (track, existing building, etc).
Rolling Stock (including the acquisition of new trains)	A capacity of 2,500 passengers in AW2 ⁶ conditions. 21 Trains.
Civil and construction works for:	Depot (1), stations (20) and the viaduct, with a depot/stabling facility in Abou Qir as an option.
Electrical and mechanical works for the track and the infrastructure to be constructed for the Project, including installation of power supply.	High voltage substation (HVS) to be constructed inside the depot.
Installation of signalling system and centralized control system throughout and across the metro line.	The centralised control system to be installed inside the depot.
Automated fare collection system at the stations.	
Track replacement and operational works.	
Diversion of existing ENR tracks, and fencing of the Project alignment from the ENR railway track in Section C.	
Diversion of Public utilities during the construction works, if necessary.	

This phase also includes the following Project Components:

- **Pedestrian Underpasses and Footbridges**

The Project is not planned to have any level crossings for the at grade segments once the Project is finished. All the current level crossings are to be transformed into pedestrian bridges. However, for viaduct segments, pedestrian crossings will be level crossings beneath the viaduct.

- **Road Underpasses and Bridges**

The construction of the viaduct will mitigate the impacts of relocating existing roads and will allow the Project to avoid congested urban areas. All intersections from Abou Qir Station to Zahiria Station, will remain following construction beneath the viaduct. In addition, the existing Mandara

⁶ AW2 (Added Weight 2) – Passenger Load includes seated passengers and standees at 4 passengers per m².

underpasses will become an at grade road crossing beneath the viaduct, which will help resolve traffic management in the area. There are no bridges planned for construction based on the final design of the Project alignment.

- **Fencing of the corridor**

The Project alignment corridor will require fencing to be installed, specifically at the at grade stations and near the depot.

- **Depot (maintenance workshop)**

The Project includes the construction of a maintenance workshop, in addition to, associated connecting tram lines and a rail siding area transition from Kafr Abdou station within Section C.

- **Centralized control and administrative building, and high voltage sub-station**

In the same land parcel as the proposed maintenance depot, the Project includes the construction of a centralized control building for the Project. Additionally, the primary administrative building will be located on the same land together with a high voltage sub-station.

2.2 Project Footprint

The spatial scope of the study/ investigation area for the assessment has been determined for the area of Influence covered by the RAP (for more details, see **Chapter 7: Project Impacts**) . The social aspects related to buffer zones or safety zones⁷ were also considered in the area of impact for the RAP works, that covers the following:

- The alignment and its right of way;
- New stations and the depot land;
- The shops adjacent to the Project alignment corridor; and
- The residential buildings externally adjacent to the Project alignment corridor.

The area of influence for the social aspects/ topics is limited to the area affected by temporary and permanent land take and related economic displacement as described in **Table 2-2** below.

Table 2-2: Area of Influence for RAP Impacts

Impact/ Aspect	Area of Influence
Land Use	Only limited to areas of land acquisition, which includes the Project alignment corridor (ENR properties), land parcels required for new stations, the depot land and (13) Mosques built on ENR property.

⁷ The distance between the Viaduct Sound Barrier outer edge and any existing structures should be kept as minimum of 5m. The EPC Contractor should consult the organisation for any section where this distance is less than this figure. In addition, Civil Defence will be advised taking into consideration all precautionary measures required.

Impact/ Aspect	Area of Influence
Socio-Economic Conditions	Both the formal and informal socio-economic activities inside the existing stations and the Project alignment have been taken into consideration. In addition, shops externally adjacent to the Project alignment in sections A and B have also been considered. Socio-economic consultations were undertaken with some impact groups to determine perceived impacts due to the Project including employment opportunities, loss of livelihood activity, etc. Refer to Chapter 6: Affected People and Assets for further details.
Structural Integrity of Buildings	The buildings externally adjacent to the Project alignment corridor in the area between Al Zahiria and Sidi Bishr station (Section B) have been taken into consideration ⁸ .

2.3 Analysis of Alternatives

The Project has undergone a number of changes to the proposed Project design after various assessments and analysis that have been undertaken. There are a number of core factors that have contributed to the decision making process on Project alternatives. Some of the alternatives available were assessed as either limited or unfeasible to be not feasible. This section further analyses the alternatives from an environmental, technical, social and economic aspect.

Several alternatives for this Project were considered prior to undertaking the ESIA and these are presented in detail within the Abou Qir To Misr Station ESIA. In summary, the alternatives comprise:

- **'No Project Alternative' scenario**

The first alternative to consider, is that of not developing the Project. This alternative is used as the reference point to compare potential impacts that may arise during pre-construction, construction, operation and decommissioning. The upgrade and electrification of the Project will introduce various environmental and social gains. Since the benefits of the Project outweigh the impacts (that are considered manageable), the 'No Project Alternative' has not been considered.

⁸ The design of the Project, as well as the Project's needs for the land parcels that have been identified, do not require the removal of any residential/commercial buildings. However, buildings have been added to the entitlement's matrix due to the possibility that structures adjacent to the Project may be affected by excavation activities in the viaduct section which are: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr. Emphasizing that the EPC contractor is responsible for the safety of the structures and facilities surrounding the construction sites during construction activities. EPC contractor agreements will include provisions on damages to structures caused by construction activities to ensure such incidents are covered by the relevant contractor. The EPC contractor will be required to provide compensation as defined in this RAP.

- **Site Alternatives**

The proposed Alexandria Metro Project will be constructed within the existing railway alignment and current ENR corridor. Under the circumstances that the Project was developed in a new area, higher costs would be incurred, additional infrastructure would be required and land use impacts would be more significant. Utilisation of the existing railway alignment also allows using land already allocated for public transport and avoids development in densely populated urban zones of east Alexandria. Hence, the current location is suitable since it will decrease the number of resources used and will limit associated physical and economic displacement.

- **Station Alternatives**

Two options have been considered for the locations of the metro station across the Project alignment: (1) elevated; and (2) at grade. The rationale behind the elevated section was to avoid highly populated areas which would also result in economic and social impacts.

- **Depot Location**

5 different options for the depot were considered for the Project under Phase 1. Among the different options, alternatives that would require an extension to the Project alignment have been avoided to ensure that traffic management and land acquisition related activities are minimised.

The alternative selected for the depot was Nahass land. The vast majority of the land is publicly owned and was previously used as a factory. The land is currently an empty unused land parcel (no informal economic activities present) that borders the right of way of the Project alignment between Zahiria Station and the new proposed Kafr Abdou Station. This land parcel would require land acquisition, as is the case for every other option considered, however it is currently not being used making it the most feasible option. In addition, the location is ideal since during construction and operation the impact would be significantly lower than the other proposed options on nearby traffic.

- **Viaduct**

The monopile construction method, similarly, followed for the monorail project, is a quick method for constructing long viaducts and bridges. The core structural components for the rail infrastructure are found on the deck of the viaduct which would be held by the monopile columns constructed. This minimizes the space needed in comparison to constructing the Project at grade, where more spaces would be required for supporting infrastructure such as noise barriers and electrical components when compared to the integrated approach when constructing and forming a viaduct. The primary element with regards to space for the design of the viaduct, is usually due to the difference in the design of the foundation between monopiles and at grade rail infrastructure. Thus, the construction and operation of the Project can be undertaken within a smaller footprint. The minimum width of the Project alignment corridor in the case of the at ground track is 13m, whilst the viaduct track will require a minimum width of 9.6m.

2.4 Alternatives Considered to Minimise Resettlement

The Project will be constructed along the existing railway line and current ENR corridor. This alternative minimises the need for land acquisition and resettlement. If the Project was developed at a different location, land use impacts could be more significant.

The incorporation of a viaduct in the Project design within Sections A and B will minimise additional land take and only requires permanent land take for the areas occupied by the pillars maintaining access between pillars. The viaduct passes through an urban heavily populated area of Alexandria. In addition, two of the new stations will be constructed on the elevated section of the Project alignment, which will reduce land acquisition impacts.

The design has minimised the need to expropriate private land and private land ownership is avoided to the extent possible with the selection of these land parcels. For example, land parcels considered for Bab Sharq and Sporting Stations are currently used as open-air car parking areas and a storage area by the landowner. In addition, there is only a small area of land used as a car wash by a formal tenant on Bab Sharq Station land parcel respectively. This reduces the effects of physical and economic displacement at these locations.

2.5 Project Land Requirements

2.5.1 Permanent Land Acquisition

2.5.1.1 ENR Property of the Abou Qir Railway Line

Currently, ENR owns the 21.7 km railway corridor (varies in width from 15 to 50m or more along the Project alignment) and all the facilities located within. Coordination between ENR and NAT is however ongoing to transfer the ownership of the Project alignment according to the Prime Minister Decision No. 2360 of 2020, which considers the Project with its installations and facilities as a Public Interest Project. The decision also includes the right of acquisition of any real estate or land needed for the Project (refer to Land Acquisition Ministerial Decision provided in **Appendix 2**).

The Abou Qir railway alignment owned by ENR includes existing facilities such as train stations, which include kiosks and cafeterias inside the current stations, shops externally adjacent to the Project alignment, mosques across the Project alignment and stationary informal vendors. The impacts of land acquisition on livelihoods will be described in detail in **Chapter 7: Project Impacts**.

2.5.1.2 Permanent Land Acquisition for the New Station and Depot Sites

Kafr Abdou Station and Depot Land: The Kafr Abdou Station and the depot will be built on the copper factory land (El-Nahas), the vast majority of the land is owned by the Ministry of the Public Business Sector. The land was previously used by a copper factory but is currently an empty land parcel that is currently not in use. Site visits by the RAP team to the two lands parcel indicated that they are currently unused by informal users. There is a building present that is regularly used as a training centre affiliated to the Industrial Development Authority. A ministerial decision of land acquisition has already been issued on 19 November 2020 in this regard. The copper factory land is mostly vacant with a number of decommissioned factories that have not been in operation over the past few decades. The El Nahas land parcel required for the Project depot is estimated to occupy an area of approximately 204,436 m².

Bab Sharq Station: The construction of Bab Sharq Station will require the acquisition of additional land from two adjacent land parcels:

1. Approximately 632 m² privately-owned land with no structures present, currently used as a parking lot;
2. Approximately 869 m² owned by ENR currently used as a warehouse; and
3. Approximately 380 m² owned by Alexandria Governorate used as part of a larger parking area.

Sporting Station: The construction of the Sporting Station will require additional land from two adjacent land parcels:

1. Approximately 852 m² occupied by an administrative building owned by the Health Directorate in Alexandria, which is a publicly-owned entity; and
2. Approximately 887 m² privately-owned with no structures, currently, used as a garage.

A ministerial decision of land acquisition has already been issued on 29 November 2021 for Bab Sharq and Sporting Stations. Site visits to the two lands parcel indicated that they are currently unused by informal users, and have no residents, used as parking area.

2.5.2 Temporary Land Acquisition

NAT stated that the Contractor will attempt to avoid any land acquisition by utilising available ENR land at the existing stations as much as possible for storage of equipment and building materials.

In case avoidance is not possible, the Contractor may need to rent additional land for this purpose. This will be undertaken through a temporary lease agreement between the Contractor and the landowner. An official contract will be agreed for a specific period, which will be renewed if needed.

2.6 Construction Programme

The Project is due to start construction commencing in 2023, with the Project becoming fully operational in 2025. The construction programme allows for pre- and post-construction activities such as mobilisation, enabling works, testing and commissioning.

A detailed construction programme will be prepared by the appointed Contractor.

3. LEGISLATIVE FRAMEWORK

3.1 Introduction

The purpose of this chapter is to outline the Lender’s policy, national legislative and EU legislative requirements, which this RAP has been prepared against to ensure the expropriation process is compliant these requirements.

3.2 Applicable International Standards

3.2.1 EBRD Requirements

The Project will be required to comply with the following PRs. The PRs cover key environmental and social issues in order to ensure that the Project will operate in compliance with the highest international standards in relation to said issues:

- PR1: Assessment and Management of Environmental and Social Impacts and Issues;
- PR2: Labour and working conditions;
- PR3: Pollution prevention and abatement;
- PR4: Health and Safety;
- PR5: Land acquisition, involuntary resettlement and economic displacement;
- PR6: Biodiversity conservation and sustainable management of living natural resources;
- PR7: Indigenous people (not applicable to this Project as no people who possess the characteristics of indigenous people as defined by PR7 are present in the Project area);
- PR8: Cultural heritage; and
- PR10: Information disclosure and stakeholder engagement.

The Project needs to meet the requirements for land acquisition, involuntary resettlement and economic displacement as specified in the EBRD’s ESP (2019) and PRs. This RAP has been developed, in accordance with PR5 as well as PR10 information disclosure and stakeholder engagement in relation to RAP development and implementation.

Performance Requirement 5

PR5 sets out the EBRD’s requirements in relation to involuntary resettlement, which refers both to physical displacement and economic displacement as a result of Project-related land acquisition and/or restrictions on land use; both temporary and permanent. PR5 also summarises the required contents of a detailed RAP.

Displaced persons may be classified as persons:

- Who have formal legal rights to the land (including customary and traditional rights recognised under national laws); and/or
- Who do not have formal legal rights to land at the time of census, but who have a claim to land that is recognised or recognisable under national laws; and/or
- Who have no recognisable legal right or claim to the land they occupy.

PR5 encourages Clients to acquire land rights through settlement agreements even if they have the legal means to gain access to the land without the consent of the seller. Such settlements help avoid expropriation and can usually be achieved by providing fair and appropriate compensation and other incentives or benefits to affected persons. However, where settlement agreements are not possible and forced eviction is required, involuntary resettlement defined under PR5 is triggered. The following, of relevance to this Project, are required:

- Feasible alternative Project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social and economic costs and benefits, will be considered.
- From the earliest stages and through all resettlement activities the Client will involve affected persons. The Project should provide the affected communities the opportunity to participate in negotiations based on the established procedures.
- Any individuals or groups that may be disadvantaged or vulnerable must be taken into account.
- Where involuntary resettlement is unavoidable, a census, asset inventory and a socio-economic baseline assessment within a defined affected area will be undertaken.
- In the absence of specific national government procedures, a cut-off date for eligibility will be established, which is often the date of completion of the above census and socio-economic survey.
- In the case of economic (but not physical) displacement the Project should develop procedures to offer to the affected persons and communities' compensation and other assistance that meet the objectives of PR5.
- The RAP will establish the entitlements of PAPs or communities and will ensure that these are provided in a transparent, consistent, and equitable manner. The procedures for determining and awarding compensation should be documented in a Plan.
- All displaced persons and communities will be offered compensation for loss of assets at full replacement cost and other assistance. Where livelihoods of displaced persons are land-based, or where land is collectively owned, where feasible, land-based compensation will be offered.
- The Project should summarise the information contained in the resettlement of livelihoods framework or plan for public disclosure to ensure that affected people understand the compensation procedures and know what to expect at the various stages of the Project (for example, when an offer will be made to them, how long they will have to respond, grievance procedures, legal procedures to be followed if negotiations fail).
- The Project should set up a Project-level grievance procedure to deal with concerns about compensation and relocation.
- Monitoring of the resettlement and livelihood restoration process will be carried out in accordance with PR1 and should involve the participation of key stakeholders such as affected communities.

The EBRD Resettlement Guidance and Good Practice document (2017) shares practical experiences and good practice gained to-date on resettlement planning and implementation, lessons learned and useful tools. The principles used throughout the document are based on PR5.

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Performance Requirement 10

PR10 describes the systematic approach to effective and meaningful stakeholder engagement, consultation and disclosure of Project information to ensure good relationships between Client and their stakeholders (including directly affected communities), promotes improved environmental and social performance through effective Project stakeholder engagement and provides a mechanism for engagement with local communities on Project impacts throughout the Project lifecycle. The Stakeholder engagement process involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism and ongoing reporting to relevant stakeholders.

3.2.2 EIB Environmental and Social Standards

The EIB Environmental and Social Standards (ESS) provide an operational translation of the policies and principles contained in the 2018 EIB Statement of Environmental and Social Principles and Standards.

Environmental and Social Standard 6

EIB ESS6 “Involuntary Resettlement” defines involuntary resettlement as both physical displacement and/or economic displacement as a result of a project-related land acquisition or restriction of access to natural resources. The goal of this standard is to avoid, minimize Project induced resettlement, prevent forced evictions, respect individual’s right to adequate housing, ensure that resettlement mitigation measures are designed and implemented through meaningful consultation, and participation of PAPs.

ESS6 describes in detail how resettlement should be planned, the tools and studies necessary for resettlement planning (census, socio-economic baseline studies, cut off dates, eligibility criteria), compensation strategies for resettlement and income restoration (valuation strategies for immovable assets at full replacement cost plus relocation expenses for homes, and full replacement cost based on market value, productive potential, or equivalent residential quality, including any administrative charges, title fees or other legal transaction costs for land).

The implementation of ESS6 requires continuous stakeholder engagement and particular attention to vulnerable groups in line with the requirements of ESS10 in relation to stakeholder engagement. ESS6 commits to improvements in the conditions of PAPs that used to live in substandard living conditions prior to the Project led displacement.

Environmental and Social Standard 7

EIB ESS7 “Rights and Interests of Vulnerable Groups” sets out to avoid or minimize, or otherwise mitigate and remedy, potentially harmful effects of EIB operations on vulnerable individuals and groups. ESS7 ensures that the vulnerable groups identified during the screening phase of the Project, and a detailed analysis is conducted during Social Assessment phase of the Project to ensure that vulnerable groups are not adversely impacted by the Project. It is essential to include the vulnerable groups in the Project’s stakeholder engagement plan (SEP) in line with ESS10.

Environmental and Social Standard 10

EIB ESS10 “Stakeholder Engagement” actively promotes the right to access to information, as well as public consultation and participation; the right to access to remedy, including through grievance resolution. It promotes an open, transparent and accountable dialogue with all relevant stakeholders at the local level and stresses the value of public participation in the decision-making process throughout the preparation, implementation and monitoring phases of a project.

Specific objectives of the standard are to:

- Establish and maintain a constructive dialogue between the promoter, the affected communities and other interested parties throughout the project life cycle;
- Ensure that all stakeholders are properly identified and engaged;
- Engage stakeholders in the disclosure process, engagement and consultations in an appropriate and effective manner throughout the project lifecycle, in line with the principles of public participation, non-discrimination and transparency;
- Ensure that the relevant stakeholders, including commonly marginalised groups on account of gender, poverty, educational profile and other elements of social vulnerability, are given equal opportunity and possibility to voice their opinions and concerns, and that these are accounted for in the project decision-making; and
- Duly verify and assess that the quality and process of engagement undertaken by third parties on the project conform to the provisions included in the present standard.

3.2.3 AIIB Environmental and Social Framework

The Project will be compliant with AIIB’s Environmental and Social Framework (ESF) 2016 (amended 2019). The AIIB Environmental and Social Standards set out the AIIB’s commitment to sustainable development, through a Bank Policy and three environmental and social standards (ESSs). These standards set out mandatory environmental and social requirements to support decision-making by AIIB, manage operational and reputational risks of AIIB and its shareholders in relation to environmental and social risks and impacts on projects, provide for environmental and social screening and categorization of projects and analyse potential environmental and social risks and impacts of projects. The environmental and social requirement applicable to the Project is ESS2 Land Acquisition and Involuntary Resettlement.

3.2.4 AFD Requirements

All projects financed by AFD are required to fulfil national environmental and social regulations and a number of good international practices. These mainly include:

- The World Bank Safeguard Policies for public sector financing;
- The UN Principles for Responsible Investment (UNPRI);
- The IFC Performance Standards;
- The major international conventions ratified by Egypt;
- The United Nations Universal Declaration on Human Rights;
- The ILO fundamental conventions on labour law; and

- The United Nations Convention on the Elimination of All Forms of Discrimination against Women.

AFD Group does not have specific Environmental and Social Standards but follows World Bank Group Standards.

3.3 Egyptian Legislation Related To Resettlement

This section summarises key Egyptian legislation that applies to this RAP.

Constitution of the Arab Republic of Egypt

The Constitution of the Arab Republic of Egypt is the fundamental law of Egypt. The Egyptian Constitution of 2014 was passed in a referendum in January 2014, replacing the Egyptian Constitution of 2012, taking effect on 18 January 2014. A constitutional amendments referendum was held from 20 to 22 April 2019. Two chapters of the Constitution of the Arab Republic of Egypt are relevant to the expropriation of land:

Chapter Two Part One: Social and Moral Components – The State shall guarantee equality of opportunity to all Egyptians and coordination between woman’s duties towards her family and her work in the society, considering equality to men in the political, social, cultural and economic spheres without detriment to the rules of Islamic jurisprudence.

Chapter Two: Economic Components – Article 29 states that peoples’ land ownership is protected by the State, and is divided into three types: public, cooperative and private property.

Public/State land – Land belonging to the State. This includes the State’s public domain land that cannot be alienated, and the State’s private domain land which can be alienated generally through sale, lease, Takhssiss⁹ or through Haq Intifaa¹⁰. The majority of land in Egypt is State-owned desert land which is largely undeveloped (estimated to be 90-95% of the national territory).

Cooperative land – According to Article 37 of the Egyptian Constitution; Cooperative ownership is inviolable. The State takes care of cooperatives. The law guarantees their protection and support, and guarantees their independence. It may not be dissolved or managed except by a court ruling. Owners of a co-op own shares of the cooperative instead of owning their unit outright. Co-ops are often less expensive because they operate on an at-cost basis.

⁹ The conditional transfer of land dependent on meeting certain criteria, e.g. keeping the land use unchanged and paying the remaining instalments of the land price.

¹⁰ “Haq Intifaa” in the Egyptian Law Haq Intifaa in Articles 985 to 995 of the Egyptian Civil Code is included in the section on rights subordinated to property rights. Usufruct properties: The right of usufruct is a right subordinated to the right of ownership that gives its owner the authority to use the asset without the need for the mediation of another person. The right of usufruct is not perpetual like the right of ownership, but rather it is temporary and ends with the expiry of the term specified for it. If no time has been set for its expiry, it ends with the death of the beneficiary. In all cases, it ends with the death of the beneficiary, even if the date has not expired. The usufructuary has the right to use and exploit the asset, which requires that the usufruct asset should not be destroyed by use.

Private land – Land which may be alienated/transferred freely. Article 24 of the Constitution states that "private property is protected; and it shall not be expropriated except for the public benefit, and in return for fair compensation, to be paid in advance. All of this is in accordance with the law."

Resettlement Legislation

While expropriation is inevitable, the expropriation fees must be paid prior to land entry by law. Moreover, the owner and occupant of the immovable property subject to expropriation and other concerned parties may file a lawsuit through judicial courts against the appraised values and factual errors. The relevant articles of the Law that will be referenced during the Project's land acquisition activities are explained briefly in **Table 3-1** below.

Table 3-1: Egyptian Legislation on Expropriation

Law ¹¹	Description
Egyptian Constitution	<p>The new Egyptian Constitution, which was issued at the end of 2014, stipulated in its Article 33 that "the state guarantees the legitimate ownership of all kinds: "Public, Cooperative, Private, and Endowment, and protect it, in accordance with the law".</p> <p>The Constitution also includes the following articles relating to ownership:</p> <p>Article 34 states that public property is inviolable and may not be infringed upon, and its protection is a duty in accordance with the law.</p> <p>Article 35 states that private property is protected, and the right to inherit is guaranteed. Private property shall not be expropriated except for the public benefit and in return for fair compensation paid in advance in accordance with the law.</p>
Law 187/2020	<p>The Law stipulates that Article 12 of Law No. 10 of 1990 regarding land acquisition for the public benefit is replaced by the following article:</p> <p>Article (12): If the forms or the ministerial decision have not been deposited according to the procedures stipulated in the previous articles within three years from the date of the public benefit decision in the official gazette; the decision shall be considered as if it was not for land acquisition for which the forms or the decision related to.</p> <p>The proposed amendment aims to address some of the drawbacks that have emerged because of the application of Law No. 10 of 1990 regarding land acquisition for the public benefit, which lead to obstructing the procedures of property dispute for the public benefit.</p> <p>The law also comes within the framework of creating a new constitution that aims to protect private property, through fair compensation paid in advance in accordance with the law.</p>
Law 24/2018	<p>Replace the provisions of Articles 2, 3, 5, 6, 7, 13, 15 of Law No. 10 of 1990 regarding expropriation of real estate for the public benefit.</p>

¹¹ These laws are amendments to some articles of the Law Act No.10 of 1990 concerning expropriation of immovable property for public interest. Therefore, all fall under the Law of Expropriation for the public benefit, and are distinguished by the law number and year of issuance according to what is published in the official newspaper.

Law ¹¹	Description
	<p>The public benefit report shall be attached to the decision of the President of the Republic or his authorised representative, accompanied by: a note stating the project to be executed; a drawing of the overall planning of the project and the real estate necessary for it.</p> <p>The compensation is estimated according to the prevailing prices at the time of the expropriation decision, and additional 20% of the value of the estimate included in the compensation.</p> <p>The decision for the public benefit shall be published with a copy of the memo referred to in Article 2 of this law in the Official Gazette. In addition, the memo will be affixed in the place prepared for advertisements at the headquarters of the local administration units, in the mayor or police headquarters, and in the primary court located in the property department, and on the front of the property subject to expropriation in a visible manner.</p> <p>Prior to the asset inventory, an appointment date will be announced publicly and “concerned parties” shall be notified in writing and “all owners and right holders” will be convened to appear before the responsible committee conducting the inventory on the Project site to identify/clarify properties and ownership rights.</p>
Law 1/2015	<p>Amendment of some provisions of Law No. 10 of 1990 on land acquisition due to public interest. The amendment states in Article 7 that after depositing the compensation, the entity in charge of acquisition shall prepare lists with the real estate subject to acquisition, areas, locations, names of owners and property holders, their addresses, and the value of compensations stipulated. These lists and respective maps showing the location of all properties, shall be sited in the head office of the entity in charge.</p> <p>Article 8 also states that the concerned owners and holders of rights have the right to object to the information contained in such lists within 15 days from the date of posting and publishing the lists and information of the expropriated properties.</p>
Law 10/1990	<p>This Law identifies transportation projects as public benefit activities. It describes acquisition procedures as follows:</p> <ul style="list-style-type: none"> • The procedures start with the declaration of public interest pursuant to the presidential decree accompanied with memorandum on the required project and the complete plan for the project and its structures (Law 59/1979 and Law 3/1982 provided that the Prime Minister issues the decree); and • The decree and the accompanying memorandum must be published in the official newspapers; a copy for the public is placed in the main offices of the concerned local Government unit. <p>This law has specified, through Article 6, the members of the Compensation Assessment Commission. The commission is made at the Governorate level, and consisting of a delegate from the concerned Ministry’s Surveying Body (as President), a delegate from the Agricultural Directorate, a delegate from the Housing and Utilities Directorate, and a delegate from the Real Estate Taxes Directorate in the Governorate. The compensation shall be estimated according to the prevailing market prices¹² at the time of the issuance of the Decree for Expropriation.</p>

¹² These market prices are established for each asset as follows:

Law ¹¹	Description
	Article (21) Law 10 of 1990: If only a part of a land parcel is subject to expropriation, with the remaining land not able to be used, the concerned parties (PAPs) are able to submit a request under Law for expropriation of the entire land parcel during the period stipulated in this Law. If this occurs, all the procedures stipulated in this Law shall be followed without the need to issue the decision defined in Article (2) of this Law.
Law 577/1954	<p>Law 577/54, which was later amended by Law 252/60 and Law 13/162, establishes the provisions pertaining to the expropriation of real estate property for public benefit and improvement.</p> <p>Article 23 of this law states; <i>"If the purpose of the property expropriation is the establishment of a squares, streets, or their expansion, modification, demarcation, or the establishment of a new district, or for its improvement/ upgrading or beautification, or for any health related matter; property expropriation may include, in addition to the real-estate property needed for the project, any other real-estate property which the administration in charge seems to be necessary to achieve the project's objective or any other property whose current state (whether in size or form) is not consistent with the required improvement."</i></p> <p>Moreover, the first article of Law No. 27 of 1956 allows for the expropriation of districts for their improvement, upgrading, re-planning, and reconstruction. Article 24 of Law 577/54 also stipulates that in case only partial expropriation of real estate property is required, and the remaining un-expropriated part will not be of benefit to the owner; the owner shall be given the right to submit a request within 30 days (beginning from the date of final disclosure of the list of the expropriated property) for the purchase of the entire area.</p>
Law 27/1956	<p>Law No. 27 of 1956 stipulates the provisions for expropriation of districts for re-planning, upgrading, and improvement, and the amended and comprehensive Law No.10 of 1990 on the expropriation of real estate for public interest.</p> <p>The first article of Law No. 27 of 1956 allows for the expropriation of districts for their improvement, upgrading, re-planning, and reconstruction. Article 24 of Law 577/54 also stipulates that in case only partial expropriation of real estate property is required, and the remaining un-expropriated part will not be of benefit to the owner; the owner shall be given the right to submit a request within 30 days (beginning from the date of final disclosure of the list of the expropriated property) for the purchase of the entire area.</p> <p>It should be noted that the new law has not restricted the right to request the purchase of the remaining un-expropriated portion of real estate whether it is a building or land.</p>
Civil Code 131, 1948	<p>Articles 802-805 outline the rights of private ownership:</p> <ul style="list-style-type: none"> Article 802 states that the owner, pursuant to the Law, has the sole right of using and/or disposing his property;

- Houses: Housing and Utilities Directorate in the governorate,
- Crops and trees: According to the price list issued by the Agricultural Directorate in the governorate, it is updated and approved every year.
- Land: Directorate/ Survey Authority in each governorate.

Law ¹¹	Description
	<ul style="list-style-type: none"> Article 803 defines what is meant by land property (immovable assets that fall under this category); and Article 805 states that no one may be deprived of their property except in cases prescribed by Law and would take place with an equitable compensation. <p>Articles 168-171 include the right to sue in the event of damage (all kinds; physical, economic, moral, psychological, etc.) and compensation is estimated according to the type of the damage through the competent judge. The person responsible for compensation is the one who caused the damage.</p> <p>Reference is made to this law to clarify the right to compensation for property.</p>

Additional Legislation

Supplementary to the Egyptian Constitution and the primary laws regarding expropriation listed above, the legislation detailed in **Table 3-2** is also applicable to the Project.

Table 3-2: Additional Egyptian Legislation Related to Land Acquisition

Law	Description
Forest Law Pasture Law	<p>One of the key legislative pillars of nature protection in the Arab Republic of Egypt is the Law No. 102/1983 on protected areas. Warning signs with pictograms of forbidden activities including big notice "By Law No. 102 of 1983" can be found on every beach along the Red Sea. Everyone is obliged to respect the law.</p> <p>By the Law No. 102/1983 shall be prohibited:</p> <ul style="list-style-type: none"> catching transporting killing or disturbing wildlife; damaging or removing any living organisms or natural features and resources such as shells, corals, rocks, or soil for any purpose; damaging or removing plants (from) the protected areas; spoiling or destroying the geological structures (and other features) of areas serving as natural habitats and breeding areas for plants and animals introducing foreign (non-indigenous) species of biota into the protected area; and polluting the soil, water, or air of the protected areas in any manner. <p>Article 2 in the Law No. 102 of 1983 which says that hunting, quarrying and disturbing nature in protected areas of the Arab Republic of Egypt is forbidden. This de facto means that all protected areas of Egypt are considered to be a wilderness.</p> <p>In addition, the Law No. 102 of 1983 is addressed to protected areas only, which includes the entire coral coastline of the Red Sea in Egypt. More specifically, building activities are permitted outside national parks and nature reserves, but nearby natural beaches and coasts must remain untouched.</p>
Cadastral Law	<p>The Public Survey Authority was established in 1898 to preserve the rights and property of the people and the government in their real estate and lands, under the name of the Public Survey Authority. The purpose of the Public Survey Authority at the time was to prepare topographic maps for Egypt, including the production of maps and ownership books for agricultural lands and for real estate built within cities with the aim of</p>

Law	Description
	<p>collecting taxes real estate on it, in addition to, the establishment of records of those assigned to it.</p> <p>In 1971, the Public Survey Authority turned into a public authority affiliated with the Ministry of Irrigation, and its tasks were determined by several republican decisions, the latest of which was Republican Decree No. 328 of 1983. Its system of supervision over survey work carried out by others was determined by Republican Decree No. 298 of 1984, then it turned into an economic authority 2001.</p>
Land Registry Law	<p>Land and Real Estate Ownership Registration Law, Law 142/1964: This law governs cadastral surveying, mapping activities and property registration in Egypt. It emphasizes the application of the Real Folio System to register agrarian lands as was introduced by Law 142/1964. Article 1 provides for the Real Estate Registry which refers to a land cadastre that states the characteristics of each property, its legal status, the rights and obligations of different parties in relation to the land, as well as all the transactions that have been carried out. According to Article 58, every landlord has the right to be handed a copy of the real estate journal which is referred to as a "Title of Ownership".</p>
Notification Law	<p><i>Notification of workers contract termination</i></p> <p>It is carried out in accordance with the Egyptian Labour Law 12 of 2003.</p> <p>Articles 111 to 118 clarify the terms of work contracts termination notification in accordance with the law.</p> <p><i>Notification of lease termination</i></p> <p>The relationship between the landlord and the tenant is governed by the Premises Lease Law No. 49 of 1977 and Law No. 4 of 1996.</p> <p>Law 49 of 1977 prohibits the landlord from receiving a rent advance and considers the failure to specify a rental period in the rental contract as a permanent continuation of this contract.</p> <p>Law No. 4 of 1996 allows the landlord to receive a rent advance, as well as specifying a contract period of no more than 59 years. The landlord has the right to terminate the contract after the lease payment period has expired, and the landlord may make an annual rent increase.</p> <p>All contracts (work contracts or lease contracts) expire with the end of the contract period stipulated in the contract or the death of the contractor (except for the old contracts that were said in 1996). The contract is also valid in accordance with the conditions specified within it and agreed upon by both parties (whether they include a period of notification or not).</p>

Announcement of Prime ministerial decree

After a preliminary expropriation assessment desk study was carried out, the Ministry of Transport (MOT) presented a memorandum to the Cabinet of Ministers to issue a decree of public interest for the Project.

A field survey was then conducted by NAT (through a consultant) to confirm the outcomes from the feasibility study for the design to request land for the Project to be included in the ministerial decree. Refer to **Chapter 4: Land Acquisition Process and Principles** for further details. The MOT and NAT then

requested the Prime Minister to issue the public interest decision of land acquisition based on the survey result.

A Prime Ministerial Decree of land acquisition for public interest (Decree No. 2360 November 19, 2020, and the amended ministerial decree No. 3301 November 29, 2021) was therefore issued with a memorandum covering the project description and necessary area for land acquisition. the decree was also published in Egypt’s national gazette (No. 47 A November 19, 2020, and the amended decree No. 47 F November 29, 2021), as well as the headquarters of a governorate office and first instance court in the jurisdiction area where the land acquisition will be conducted.

Based on the issuance of the Ministerial Decree, NAT has deposited the estimated initial compensation amount into an escrow account until the final estimates of the compensation are completed. This evaluation is carried out by the Egyptian Survey Authority (ESA) and the Alexandria Survey Directorate (ASD) under national law.

Administrative Structure

The MOT is the responsible party for requesting the issuance of the relevant decrees such as public interest, land acquisition and establishment of the compensation committee within NAT for the land acquisition requirements of the Project. The ASD and ESA are considered the entities responsible for estimation and compensation value of land and land acquisition for the Project. The compensation committee established within NAT covers the compensation for informal users and impacts on livelihoods. **Chapter 8: Institution Arrangements** describes the full institutional arrangement for implementing this RAP in-line with Lender’s Requirements.

3.4 Gap Analysis Between Lender’s Requirements and Egyptian Expropriation Law

The key gaps between the national legislation of Egypt and Lender’s Requirements relevant for this Project are summarised in **Table 3-3** below.

Table 3-3: Gap Analysis between Lender's Requirements and Egyptian Law

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
Avoidance and minimisation	The Client will consider feasible alternative Project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social, and economic costs and benefits.	The Client will avoid or, when unavoidable, minimise involuntary resettlement by exploring alternative projects, project designs and locations; and avoid any forced evictions.	There is no provision regarding the avoidance or minimisation of resettlement or forced eviction in Egyptian legislation.	The avoidance and minimisation of impacts is not required by national legislation, but it is required by the Lenders.	Measures have already been taken to avoid and minimise resettlement, in addition to, forced eviction, and alternative designs have been considered for the Project. ¹³ Project alternatives already considered are described in Chapter 2: Project Description Section 2.3 . In addition, the alignment follows the existing railway right of way, where feasible, to minimise land acquisition and economic displacement.
Identification of potentially adverse impacts on land acquisition	Affected populations and impacts should be identified through thematic maps and carrying out a census. An inventory of affected assets should be collected, and socio-economic surveys and studies should be carried out.	Conduct a census and a socioeconomic baseline survey to identify all PAPs who will be physically or economically displaced and eligible for compensation and/or assistance. The socioeconomic baseline survey shall include	Only a census of formal landowners and an inventory of assets is required by Egyptian Law. Land acquisition through expropriation requires the preparation of a census of	No social studies, surveys and consultations are required under Egyptian Law; only the consultation activities related to the preparation of the EIA. No census of informal users is required.	Asset inventory of those with formal rights (land/ assets owners): The ASD is responsible for the census of the land/assets owners mentioned in the land acquisition ministerial decree and issuing a list that which include the

¹³ SYSTRA, the project consultant, has prepared several studies, including:

- PHASE 1 – ABOU QIR to MISR STATION. Occupations along the corridor.
- PHASE 1 – ABOU QIR to MISR STATION. VERTICAL PROFILE AND STATION TYPES
- Which focused on describing the current situation of the railway corridor and its compatibility with the project's land needs.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	Analysis of the information collated should be undertaken, as well as consultation with affected populations to develop and verify the findings.	current socioeconomic profile of the PAPs, an assessment of vulnerability, types and nature of impacts.	affected immovable assets, and a list of their owners. The Assessment Committee identifies the properties affected by a project, as well as confirming the location and legal status of affected properties with a property owner.		<p>landowner's name, area and compensation amount (lists of owners' names have not been issued, the list of the depot landowners is expected to be issued in June 2022).</p> <p>An asset inventory of those with formal rights (business owners) and informal users (stationary informal vendors, mobile informal vendors) was carried out by NAT in October 2021. The census and asset inventory conducted by ENR. The census and asset inventory conducted by ENR as an update, and the final census compiled by the Compensation Committee in May 2022 to determine the expropriation for the Project.</p> <p>An initial reconnaissance of the Project impacted area was undertaken in April 2022 to identify impacted households and PAPs to inform the sampling approach to the household socio-economic surveys. The survey included an update to the ownership,</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					quantity and quality of resources/assets which will be impacted by the Project, including: loss of access to housing (physical displacement); and land, natural resources and cultural resources (economic displacement).
Resettlement and/or livelihood restoration plan	A RAP is required where land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unavoidable.	A RAP is required for projects leading to significant physical displacement, and a Livelihood Restoration Plan (LRP) is required for projects leading to economic displacement to improve, or at least restore, the incomes or livelihoods of affected persons. The LRP can be devised as a stand-alone document or incorporated in the RAP in cases where the project leads to both physical and economic displacement.	There is no requirement to prepare a formal RAP under Egyptian Law, nor to undertake any of the component activities of a RAP such as, a ‘census’, socio-economic survey, consultation with PAPs, monitoring or reporting. Moreover, there are no specific references in Egyptian Law to ‘involuntary resettlement’, nor any explicit consultation requirement. Egyptian law requires the preparation of a land acquisition decree that sheds light on the required assets and lands that must be expropriated.	There is no requirement under Egyptian Law to prepare a RAP. This is, however, a requirement by the Lenders.	This RAP has been prepared to bridge the gap between Egyptian national requirements and Lender’s requirements. An additional RAP budget (RAP Fund) approved by a Ministerial Decree will be established to meet full replacement value and other costs needed to compensate informal users and provide livelihood assistance and support. The entitlements matrix in Chapter 9: Entitlements and Compensation describes the entitlements for eligible PAPs for this Project. Chapter 11: Livelihood Restoration Plan contains the measures for NAT to develop a Livelihood Restoration Programme,

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					providing assistance to those PAPs who will be economically displaced because of the Project, both permanently and temporarily during construction.
Replacement cost	Compensation paid to PAPs must meet full replacement value.	Compensation paid to PAPs must meet full replacement value.	Under Egyptian Law, replacement costs are already included in the compensation for the formal landowners only.	There is no replacement costs paid to formal tenants and informal users of land and structures.	This RAP has been prepared to provide compensation to full replacement cost formal tenants and informal users of land and structures, in addition to legal landowners.
Eligibility and cut-off date	Eligible persons may be classified as persons: (i) who have formal legal rights to the land (including customary and traditional rights recognised under national laws); (ii) who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws; or (iii) who have no recognisable legal right or claim to the land they occupy. All those persons must be registered	All displaced persons are eligible for certain types of mitigation measures. They may be classified as: a) Persons with formal legal rights to land or assets (including customary and traditional rights recognised under national laws); b) Persons who do not have formal legal rights to land and/or assets, but who have claims to land or assets that are recognised or recognisable under national laws or customary and traditional rights; c) Persons who occupy/use the land and/or	Under Egyptian Law, the only people and entities entitled to compensation are those with registered property rights – registered landowners, occupants, users and those with registered third-party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration. Egyptian Law does not recognise the rights of squatters.	Egyptian Law only provides compensation for the formal owners, occupants and users who have their land ownership and/or use registered, as part of the land acquisition process. There is no requirement to undertake a census to identify or compensate those who are not currently included in the official governmental land registry such as informal land users. The date of the ministerial decree for land acquisition is not aligned with Lender's	A socio-economic survey was undertaken (in April/May 2022) in order to identify all formal and informal users and those who are not currently included in the official governmental land registry. This RAP will fully consider formal and informal users to bridge the gaps identified between Egyptian Law and Lender's requirements. All identified PAPs are categorised and listed in Chapter 9: Entitlements and Compensation.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	before the cut-off date to be eligible.	assets but have no recognisable legal rights or claim to it/them.	Although there is no cut-off date under the Egyptian laws, the date of publication of the land acquisition Ministerial Decree is considered a cut-off date for lands and real estate that officially is owned. Egyptian laws also take into account the date of land valuation by the Valuation Committee headed by an official from the ESA.	requirements in terms of cut-off date.	<p>According to the socio-economic survey methodology, the cut-off date will differ according to the various components of the Project. The cut-off date for all assets falling within ENR property, namely the rented shops, the mosques and the copper factory land is 19 November 2020 as defined in the ministerial decree for the depot land, as well as the decision issued on 29 November 29 2021 for Bab Sharq and Sporting Stations. Whereas, the cut-off date for all informal mobile and stationary vendors is the date the Compensation Committee completes the inventory on 17 May 2022 within the scope of the Project alignment and outside.</p> <p>Should the duration between the cut-off date and the start of construction be prolonged then NAT is to consider each additional case on an individual basis. Refer to Chapter 4: Land</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					Acquisition Process and Principles for further details.
Compensation for loss of land	<p>Economically displaced persons will be compensated for such loss at full replacement value. Compensation at replacement cost is based on valuation at average market value, plus transaction costs and the cost of restoration to an equivalent potential as that of the affected asset.</p> <p>Preferred compensation is in-kind. Compensation is to be provided before displacement or imposition of access restrictions.</p> <p>Measures should be incorporated to provide displaced people with legal assistance to enable them to complete administrative requirements prior to land acquisition and, if needed, to seek redress from the courts.</p> <p>Economically displaced persons who are without legally recognisable claims to</p>	<p>In cases of economic displacement replacement land shall be of equivalent or higher quality and situated as close as possible to the original location or to the current place of residence. Full replacement cost is defined as a method of valuation that provides sufficient compensation for replacing assets and transaction costs.</p> <p>Legal and other remedies are available at all times.</p>	<p>Egyptian Law only provides cash compensation to persons with legal / recognisable rights and claims.</p> <p>The ASD is the responsible authority for evaluating the price of land.</p> <p>The valuation methodology for trees will be according to the price list issued by the Agricultural Directorate in Alexandria Governorate.</p> <p>The valuation of lands and assets will be estimated according to the prices prevailing at the time of the issuance of the Public Interest Decree plus (20%) twenty percent of the estimated value. The entity that requests the expropriation shall deposit the full compensation amount in an account (that generates revenue of the banks that the State wholly owns) under the name of the entity that conducts the expropriation</p>	<p>The Lenders require the following persons to be compensated, who would not receive compensation in accordance with Egyptian Law:</p> <p>Egyptian Law does not require displaced persons without legally recognisable claims to land, such as tenants and informal users on public land, to be compensated for their loss of use of land. In the case of and trees, these are compensated.</p> <p>Although the amendments of Egyptian land acquisition law (Law 10/1990) through Law 24/2018. The scope of the Law has been expanded to include “right holders”, in addition to, formal owners however the definition of “right holders” in the context of this amendment remains unclear.</p> <p>There is no preference given to government-led in-kind compensation rather than cash</p>	<p>An entitlement matrix was prepared for the Project, this table presents the eligible people, households and businesses that will be entitled to compensation and assistance. Those also without a legal right to land have been included in the entitlement matrix (presented in Chapter 9: Entitlements and Compensation), providing them with compensation.</p> <p>Households using common land are included in the entitlement matrix (presented in Chapter 9: Entitlements and Compensation), providing them with compensation or assistance.</p> <p>A livelihood restoration programme will be developed by the Compensation Committee formed by representatives of ENR, Ministry of Finance and NAT, based on the livelihood</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	land will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost. The Client is not required to compensate or assist opportunistic settlers who encroach on the Project area after the cut-off date for eligibility.		procedures. This account is required to be set up within a period not exceeding three months from the issuance date of the ministerial decree.	compensation for PAPs. In addition, there is no livelihood restoration and/or transitional support provisioned in Egyptian Law.	restoration plan presented in Chapter 11: Livelihood Restoration Plan , and transitional support is included in the entitlement matrix (presented in Chapter 9: Entitlements and Compensation). NAT will seek in-kind compensation for PAPs as a preference to cash compensation ¹⁴ , where possible, as described in the entitlement matrix in Chapter 9: Entitlements and compensations and Chapter 11: Livelihood Restoration Plan .
Compensation for commercial buildings and secondary structures	Displaced persons must be offered choices among feasible resettlement options and be provided relocation assistance suited to the needs of each group of displaced persons, with	Displaced persons must be offered choices among feasible resettlement options. For persons who occupy/use the land and/or assets but have no recognisable legal rights or claim to it/them, the promoter	Compensation for property loss is calculated according to the price determined at the time of assessment by a delegated Valuation Committee comprising representatives from the governorate office of	Valuation gaps exist for buildings, i.e. Egyptian requirements do not compensate based on full replacement cost nor does it consider rebuilding cost (workers, utilities, etc.) or	The Project will establish a RAP Fund (further details provided in Chapter 4: land Acquisition Process and Principles) to meet full replacement cost. The additional compensation to reach replacement value will

¹⁴ The articles of the law do not address a clear definition of the type of compensation (cash or similar alternatives). Compensation is issued in cash, but in some cases on other NAT projects funded by IFIs with similar expectation and requirements, alternatives have been considered.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>particular attention paid to the needs of the poor and the vulnerable.</p> <p>Replacement property (for example, agricultural or commercial sites) must be provided of equal or greater value, or cash compensation at full replacement cost where appropriate.</p> <p>Alternative housing and/or cash compensation will be made available prior to relocation.</p> <p>Choice of replacement property of equal or higher value, or cash compensation at full replacement value where appropriate.</p>	<p>shall provide arrangements to allow them to obtain adequate housing and pursue security of tenure.</p> <p>Where cash compensation is offered, the valuation of all affected assets shall be at the full replacement cost.</p> <p>Where tenants are being displaced, arrangements shall be put in place to help them secure alternative locations.</p> <p>As required, the promoter shall also provide resettlement assistance suited to the needs of each group of displaced persons, paying particular attention to vulnerable PAPs and/or groups. Resettlement assistance can consist of legal assistance, moving allowances or other forms of support to be determined in consultation with the PAPs.</p>	<p>ESA (ASD) and the head of the Valuation Department at the ESA as lead of the Valuation Committee and joined by the Directorate of Housing and Utilities and Directorate of Real Estate Taxes in the relevant governorate.</p> <p>Compensation at replacement value and asset value increases are not accounted for by Egyptian Law. Compensation is calculated at the market value in the area.</p> <p>There is no requirement to find land replacement.</p>	<p>additional allowances (e.g. moving support, legal fees, etc).</p> <p>No preference is given in Egyptian Law to government-led in-kind compensation rather than cash compensation for legally owned commercial buildings and secondary structures. There are no informal users that own/occupy illegal buildings and/or structures on the government land or the other private land parcels.</p>	<p>be calculated by the Compensation Committee.</p>
Addressing loss of livelihoods	<p>Livelihoods affected by EBRD-financed projects should be restored. This could involve the replacement and/or restoration of lost land and</p>	<p>Where the PAPs' livelihood is land-based or the land is collectively owned, the</p>	<p>Egyptian Law does not assess loss of livelihoods, compensation is provided to titleholders for land loss only.</p>	<p>The Lender's requirements specify that all PAPs must be granted the right of compensation which will enable them to restore their</p>	<p>Measures to address the need to compensate loss of livelihoods (including business owners and employees) are set out in the entitlement matrix</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>structures as well as access to these assets.</p> <p>In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living.</p> <p>Economically displaced persons will be compensated for loss of assets or access to assets prior to displacement.</p> <p>Additional targeted assistance (for example, credit facilities, training or employment opportunities) and opportunities to restore livelihoods must be provided, and where possible improvements to their income earning capacity, production levels and standards of living.</p>	<p>promoter shall favour land-for-land compensation.</p> <p>Where a community's commonly held resources are affected, measures shall be implemented to allow continued access to the affected resources or to provide access to equivalent resources.</p> <p>In the case of cash compensation for all affected assets, the valuation shall be at the full replacement cost.</p> <p>In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected shall also be provided with targeted assistance and transitional support to at least restore their livelihoods. The transitional support can consist of cash, job opportunities, training, legal assistance or other forms of support to be determined in consultation with the PAPs.</p>		<p>means of livelihood at least to the levels prior to the Project.</p> <p>Egyptian Law does not make provision of livelihood loss or assessment of individual livelihood impacts. Only legal asset owners can receive compensation.</p>	<p>(presented within Chapter 9: Entitlements and compensation) and Chapter 11: Livelihood Restoration Plan.</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
		In cases of commercial structures, the compensation of the affected business-owner shall also consider the cost of re-establishing commercial activities elsewhere, and the cost of transferring and reinstalling any equipment, as applicable. Affected employees shall receive assistance for temporary loss of wages and, if necessary, assistance in identifying alternative employment opportunities.			
Compensation payment made prior to land take / displacement	Displacement or restriction of access does not occur before necessary measures for resettlement are in place.	In the case of cash compensation, the promoter shall make the payment before the actual resettlement takes place in order to allow PAPs to find a suitable replacement. The promoter shall pay due attention to the local context and personal considerations in order to select, in accordance with the affected person, the most appropriate payment method (i.e. cheque, bank transfer, cash, etc.).	Valuation of private non-agricultural land (including any physical structures or assets on this land) is determined by the Survey Directorate and included in the compensation paid. According to Expropriation Law, compensation needs to be deposited into titleholders account prior to land take.	Informal users and asset owners are not eligible under national law.	Informal users and asset owners will be paid prior to any displacement through the RAP Fund. The land will not be entered without compensation being paid to all PAPs.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
Negotiated settlement (mutual agreement)	Clients are encouraged to acquire land rights through negotiated settlements even if they have the legal means to gain access to the land without the consent of the seller. Negotiated settlements can usually be achieved by providing fair and appropriate compensation and other incentives or benefits to affected persons or communities, and by mitigating the risks of asymmetry of information and bargaining power.	ESS6 states that PAPs subject to land take are fully informed and have prior knowledgeable about the project and its implications and consequences and that they agree to freely participate in the project. They have the option to agree or disagree with the land acquisition, without adverse consequences imposed formally or informally by the State.	Egyptian Law does not contain articles emphasizing that negotiated settlements are required in the first place before resorting to expropriation.	Egyptian Law does not provide regulation or guidance on negotiated settlements and therefore does not meet Lender’s requirements and standards.	NAT has formed a Compensation Committee to negotiate with the affected shop tenants and informal economic activities. Chapter 8: Institutional Arrangements includes a description of the roles and responsibilities of the Compensation Committee.
Measures for vulnerable persons	The resettlement process and livelihood planning should provide special assistance to women, minorities or vulnerable groups.	During the resettlement consultation, planning and implementation process, the promoter shall give special consideration to individuals and groups that are vulnerable, marginalised, systematically discriminated against or excluded on the basis of their socioeconomic characteristics.	Egyptian Law on expropriation does not include requirements for engaging with vulnerable groups or providing additional compensation.	Egyptian Law on land acquisition does not address vulnerable groups. The Lenders require additional measures for these groups.	Key vulnerable populations were identified as part of the socio-economic survey. Measures to address the specific needs of these vulnerable groups have been included in the entitlement matrix. The household survey results are presented in Chapter 6: Affected People and Assets and the entitlements matrix in Chapter 9:

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					Entitlements and Compensation.
Monitoring and evaluation	Monitoring and evaluation is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	A monitoring system (i.e. resources, staff, and procedures) must be set-up commensurate to the scale of the resettlement and the risks involved. The promoter shall submit to the EIB monitoring reports as part of its reporting requirements. In the case of significant involuntary resettlement impacts, the promoter shall be required to engage an external party to conduct monitoring or a mid-term resettlement review / audit.	There are no provisions for monitoring the implementation or impacts of expropriation or resettlement in Egyptian Law.	There are no provisions for monitoring the implementation or impacts of expropriation or resettlement in Egyptian Law. The Lender’s requirements specify the need for monitoring and evaluation of resettlement and livelihood restoration.	NAT has not yet established a monitoring mechanism in relation to their expropriation and likelihood restoration activities. A monitoring mechanism has been developed in this RAP as described in Chapter 12: Monitoring and Reporting , and both will be implemented by NAT. In addition, NAT will prepare a dedicated RAP Monitoring and Evaluation Plan.
Level and timing of community engagement / consultation / negotiation / participation	EBRD emphasises early and meaningful consultations, and preparation of a SEP. The Project should consult with PAPs about the project’s environmental and social aspects and should take their views into account. Affected persons shall be given the opportunity to participate in the eligibility	The promoter shall identify and meaningfully engage with all PAPs, both men and women, host communities and other relevant stakeholders regularly throughout resettlement planning, implementation, monitoring and evaluation. The promoter shall inform PAPs about their options and rights pertaining to resettlement. The	Engagement/ participation of PAPs is accounted for in the national legislation but is limited to the publication of census results and the compensation amounts in the municipality for a two-week period from the date of publication during which individuals can object and present claims. An owner of a	Egyptian Law does not require early or on-going consultation with PAPs or communities. The Lenders require provisions to ensure effective community engagement through disclosure of Project-related information and consultation with local communities on matters that directly affect them according to Lender’s requirements.	A number of initial consultation activities were carried out during the development of the RF, and further consultation was undertaken during the preparation of the RAP (See Chapter 10: Information Disclosure and Consultations). Although the Project has acquired the right to expropriate land where

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>requirements, negotiation of the compensation packages, resettlement assistance, suitability of proposed resettlement sites and proposed timing. Consultation activities will continue during the implementation, monitoring and evaluation of compensation payment and resettlement. The Client should consult the affected people on land acquisition; resettlement and livelihood related issues; and disclose relevant documents at various stages of the project. Consultations should be meaningful and inclusive allowing for the participation of all groups and segments of affected people.</p>	<p>promoter shall disclose all relevant information in a timely and context-specific manner, in an accessible place, and in a form and language(s) understandable to PAPs.</p>	<p>property to be expropriated is informed via an official letter and requested to attend “confirmation of a property”.</p> <p>The owner’s right for compensation is addressed in Article 26: Law No. 577 of 1954. However, the rapidity of these procedures should not prevent the owners and concerned persons from claiming and ensuring their rights¹⁵. PAPs have the right to receive the compensation that estimated by the Survey Directorate and can object to the compensation value within the specified period (15 days) according to the law.</p> <p>There is no clear requirement to consult or seek participation of communities before the start of land acquisition.</p>	<p>The expropriation process involves notification of the landowners, but no social studies, surveys and consultations are required prior to land acquisition.</p> <p>There is no requirement for a Stakeholder Engagement Plan (SEP) in Egyptian Law.</p>	<p>needed, NAT will seek to establish negotiated settlements with both formal and informal PAPs through ongoing transparent communication which will be duly documented as part of RAP implementation and monitoring. Where this is not possible, the compensation principles in the RAP will still be followed, e.g. payment made to PAPs prior to land entry.</p> <p>This RAP (specifically the grievance mechanism) provides Lender’s compliant engagement actions for NAT to follow during the implementation of the RAP.</p>

¹⁵ Accordingly, the regulator has distinguished two different redress mechanisms:

- For compensations not related to the compensation assessment: Such as those pertaining to the actual right of the expropriation. In this case, the authority in charge of the expropriation process shall be responsible for investigating these disputes in order to pay the due compensation value (Article 11: Law No. 11 of 1954 and Law No. 11 of 1956).
- Disputes over the compensation assessment: These disputes are subject to legal jurisdiction as follows: The authority in charge of the expropriation procedures shall refer the disputes over the compensation assessment submitted to court. The court shall examine the complaint quickly and its judgment shall be conclusive.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
			<p>Consultation requirements are limited to what is stated in the Egyptian Environmental Affairs Agency (EEAA) guidelines regarding consultation during the preparation of the EIA (Scoping consultation activities with the concerned authorities, as well as holding a public consultation session)¹⁶.</p> <p>No social studies, surveys or consultations are required prior to land acquisition.</p>		
Gender	<p>EBRD's ESP (2014) addresses gender-differentiated aspects of impacts and opportunities, as well as gender-responsive consultation processes. The use of land and natural resources affected by the Project should be assessed in gender inclusive manner and specifically consider women's role in the management and use of these resources.</p>	<p>The promoter shall pay attention to the specific gender dimensions of involuntary resettlement, especially regarding stakeholder engagement, the census, valuations, payment of compensation and income restoration. The promoter shall put in place specific measures as necessary so that women's perspectives and interests are</p>	<p>There are no cultural norms or legal texts that prohibit land ownership for women.</p> <p>Women have equal rights to property as men.</p>	<p>Egyptian Law does not require gender responsive consultation, or the identification of gender specific risks and opportunities. This is required by the Lenders.</p>	<p>The consultation undertaken for the Project captured both men's and women's views through community and women-only focus groups, as defined in the SEP. The measures in the SEP will ensure this continues throughout the Project.</p> <p>The ASD issues lists of landowners according to the actual owner, whether he/ she</p>

¹⁶ 3 public sessions were held for the Project, in addition to the consultation activities the community during the preparation of the ESIA. During the preparation of the RAP, FGDs were held with the tenants of the shops externally adjacent to the Project alignment and the women in the residential buildings externally near the track.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
		considered in all aspects of resettlement planning and implementation. The promoter shall consider feasible measures for women to gain security of tenure and receive cash or in-kind compensation on equal terms as men.			<p>is a man or a woman. Both have the right to compensation in accordance with the law.</p> <p>The Compensation Committee will ensure that compensation payments and payment methods for shops tenants and informal economic activities inside the railway corridor are arranged in the names of both spouses or the male and female heads of households. This is covered within the entitlements matrix presented within Chapter 9: Entitlements and Compensation).</p> <p>Both male and female preferences and considerations in livelihood restoration regardless of the ownership status (i.e. considers formal and informal users); choice of resettlement options (if applicable) will be assessed.</p>
Project-level grievance redress mechanisms	Where there are Affected Communities, the Client will establish a grievance mechanism to receive and facilitate resolution of	The promoter shall establish a grievance mechanism consistent with the requirements set out in Standard 2 as early as possible.	Egyptian Law allows the creation of “Specialized	There is a generic grievance mechanism for all government projects, which enables all citizens to file complaints, comments and/or	A Project-specific grievance mechanism has been developed by NAT and included in the publicly disclosed RF. The implementation and monitoring

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>Affected Communities’ concerns and grievances about the Client’s environmental and social performance.</p> <p>The Client will establish an effective grievance mechanism as early as possible in the process, consistent with the objectives and principles of PR10 in order to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities. It will include a recourse</p>	<p>The mechanism shall be socially appropriate and readily accessible, regardless of gender or any other socioeconomic characteristics.</p> <p>The mechanism shall promptly address concerns and grievances related to the involuntary resettlement process (such as entitlements, access to information, compensation or relocation) raised by PAPs, host communities or others. Additionally, the mechanism shall include a recourse procedure to resolve any disputes in an impartial manner. The mechanism</p>	<p>Committees¹⁷ to address grievances originating from misunderstandings of Project policy or resulting from conflicts among neighbours.</p> <p>The Egyptian legal framework contains a two-step grievance redress process:</p> <p>1) A property owner is entitled to submit a grievance related to information regarding the concerned property such as legal status for 15 days after its announcement. A Project representative or governorate office are the contact window and focal point of such grievance.</p>	<p>recommendations; where any grievance can be filed through the e-Government Complaints Portal, Citizens Complaints Office at the Alexandria Governorate Headquarters and Districts.</p> <p>Court cases in Egypt are known to require long periods of time before settlements can be reached. With intent to address the lengthy time the Egyptian court may require to process and resolve disputes¹⁹.</p>	<p>of grievances are under the responsibility of NAT, however the Contractor is also responsible for conveying to NAT any grievances received at site-level.</p> <p>The grievance mechanism includes multiple channels for receiving grievances, and NAT receives written grievances for those whose owners come to submit them themselves. In addition, there is a dedicated email address for the Project (alexandriametro.nat@yahoo.com) that can be used to raise complaints/ comments/ recommendations.</p>

¹⁷ The current Egyptian laws and regulation stated that the concerned owners and right holders have the right, within 15 days from the date of posting and publishing the lists and information of the expropriated properties, to object to the information contained in such lists. The objection is made to the main offices of the Expropriating Entity or the administration to which it is attached within the governorate in which the property is located. In case of dispute between several individuals or parties on a single property, each party should present all evidence or documents that proof his/her rights within the next 90 days from submitting the memorandum of objection/ grievance. In case of failing to submit those required evidence, the grievance would be considered as not submitted. The responsible body for expropriation has the right to request additional documents deemed necessary and define proper period for submitting these documents.

¹⁹ The PAP has the right to file his complaint to NAT but the court is the official channel for filing an objection in relation to the compensation value, which gives the PAPs the right to re-evaluation in accordance with the law.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	mechanism designed to resolve disputes in an impartial manner.	should not impede access to the country's judicial or administrative remedies.	<p>2) The property owner and project proponent are entitled to submit a grievance related to the assessment result at the first instance court in a governorate where the acquisition will be conducted.</p> <p>The law also allows one month (15 days) to object to the decision of resettlement, four months to seek redress to the compensation value and three months in case of dispute between several individuals or parties on a single property. A list of properties for which no objection or appeal is made shall be prepared. No objection or dispute may thereafter arise with respect to these particular properties. Payment made to the owners and holders of rights in these properties shall be conclusive as to the fulfillment of the Expropriating Entity's payment obligations.¹⁸</p>		<p>NAT will have to follow up on all complaints related to the Project, which can be submitted through other channels such as the e-Government Complaints Portal, Citizens Complaints Office at the Alexandria Governorate Headquarters and Districts.</p> <p>Refer to Project SEP and Chapter 10: Information Disclosure And Consultations for further details.</p>

¹⁸ No objection or appeal shall prevent the property owner or holder of rights therein from collecting the estimated compensation amount.

4. LAND ACQUISITION PROCESS AND PRINCIPLES

This Chapter outlines the actual land acquisition and compensation process for the Project. The Compensation Process described in this section applies to all PAPs identified for the Project, including landowners, shop tenants, mosques and informal users.

4.1 Land Acquisition Process

The regulation of the right to ownership in the constitution and the law (the new Egyptian Constitution issued at the end of 2014) stipulated in Article 33 that "the state guarantees the legitimate ownership of all kinds: "Public, Cooperative, Private and Endowment, and to protect it, in accordance with the law".

The Project includes two types of land ownership, namely, publicly owned land and privately owned land. Thus, the land acquisition process adopted differs according to the type of land ownership.

4.1.1 Acquisition of Public Lands

Public Lands (in Arabic *Amlak Amiriya*) is divided into:

- (1) the State's public domain that cannot be alienated (or taken away from or given away by the State); and
- (2) the State's private domain which can be alienated by the State generally through sale, lease, *Takhssiss* (i.e. conditional transfer on meeting certain criteria, such as keeping the land use unchanged and paying the remaining instalments of the land price).

The Law 10, 1990 stated that state public property may not be expropriated; rather the concerned administrative parties would enter into an agreement with respect to such property either by divesting the property in question from its public characterization or by re-appropriating the said property to another public use or entity.

The Project includes public land parcels, which are:

- ENR property within Project alignment corridor east of the Egypt Station including passenger stations, etc. and facilities to serve the public (which includes 13 mosques impacted by the Project);
- A health unit building affiliated to the Health Directorate in Alexandria and under ownership of the Alexandria Governorate (to be used for the construction of the Sporting station);
- A training centre on the depot land²⁰;

²⁰ The training centre was closed during the site visits undertaken as part of the socio-economic survey.

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- Part of the pedestrian walkway and part of a designated parking area belonging to Alexandria Governorate (to be used for the construction of Bab Sharq Station); and,
- A land parcel owned by ENR (for the construction of Bab Sharq Station).

The allocation of public land and real estate of government agencies whose data is included in the land acquisition ministerial decree shall be terminated. Subsequently, the usufruct right would be transferred over to NAT under the public benefit decision for the Project.

Reallocation of land is mainly between two governmental entities from ENR and the Alexandria governorate to NAT without compensation to be paid. This land transfer is enabled based on the public interest ministerial decree. However, in certain conditions, compensation might be paid, as in the case of the majority of the depot land area that is owned by the El Nahas Company of the Ministry of Business Sector. The procedures involved in the private land acquisition are presented in **Section 4.1.2** below.

4.1.2 Acquisition of Private Lands

Private land and/or property belonging to private persons (individuals or corporate) or to State private property, which may be alienated/ transferred freely. Article 35 of the Constitution 2014 states that: "private property is protected; and it shall not be expropriated except for the public benefit, and in return for fair compensation, to be paid in advance. All of this is in accordance with the Law".

The Project includes private land parcels, which are:

- Kafr Abdou Station and depot land: The Kafr Abdo station and the depot will be built on the former Copper factory land (El Nahas Company), which is currently owned by the Ministry of the Public Business Sector;
- A private land parcel to be used for the development of Bab Sharq Station (currently used for parking, with a car wash); and
- A private land parcel to be used for the development of Sporting Station (currently used for parking).

The process of land acquisition includes the following procedures and steps described in **Figure 4-1** below.

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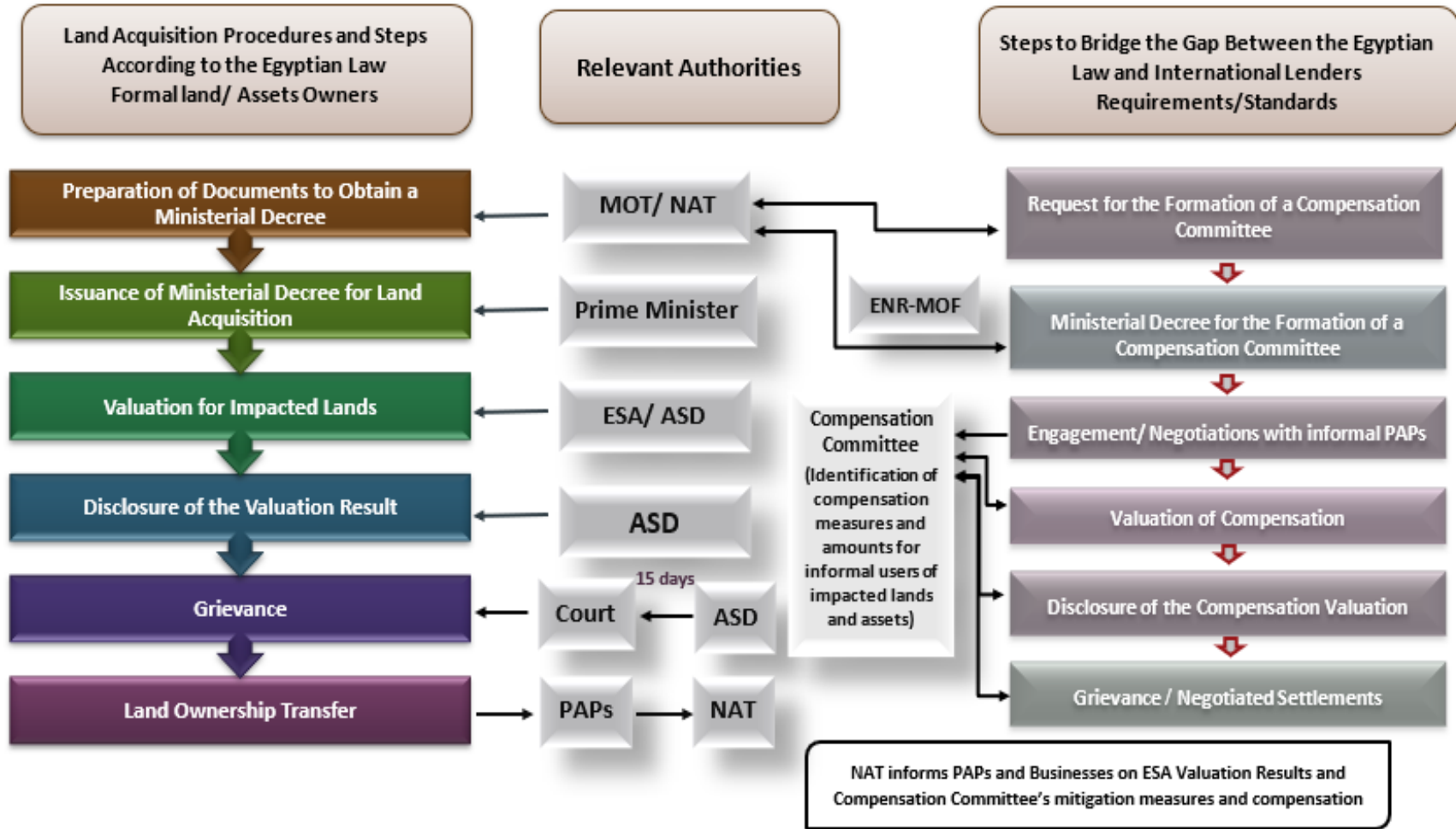


Figure 4-1: Private Land Acquisition Process

a) Land acquisition procedures and steps according to the Egyptian Law (Formal Land/ Assets Owners)

According to the Law 10, 1990, the land acquisition process in Egypt involves: (i) declaration of public interest pursuant to a Presidential/ Prime Minister Decree accompanied with a memorandum on the required Project and a complete design plan for the Project and its buildings (Law 59/1979 and Law 3/1982 empowers the Prime Minister to issue the decree); and (ii) the decree and the accompanying memorandum must be published in the Official Gazette.

1. Preparation for Issue of a Prime Ministerial Decree of Land Acquisition due to Public Interest

The following steps were taken to prepare for the issuance of the Prime Ministerial Decree of Land Acquisition for the Project:

- a) NAT technical consultant (SYSTRA) conducted the Project study²¹.
- b) A pre-identification for the areas subject to land acquisition and which require ownership transfer that are incompatible with the Project design that has been carried out.
- c) The MOT prepared and presented a memorandum to the Cabinet of Ministers to issue a decree of public interest for the Project.
- d) NAT technical consultant (SYSTRA) conducted a field survey in order to confirm the outcomes of the desk study by collecting the study data on land acquisition for public interest.
- e) The Project owner (MOT)/Project authority (NAT) requested the Prime Minister to issue a decision of land acquisition based on the survey result.
- f) The Project owner (MOT)/Project authority (NAT) has deposited the estimated initial compensation amount into an escrow account until the final estimates of the compensation are completed. This evaluation is carried out by the ESA and the ASD under national law.

2. Issuing a Prime Ministerial Decree of Land Acquisition due to Public Interest

A Prime Ministerial decree of land acquisition for public interest is issued with a memorandum covering the Project description and necessary area for land acquisition for public interest. The decree is also published in Egypt's national gazette. This has already been completed for the Project, where the decree was published in the Official Gazette on 19 November 2020, as well as the decision issued on 29 November 2021, to add the two land parcels at Bab Sharq and Sporting Stations. The content of Appendix 1(a) and 1(b) to the decree define the scope and jurisdictional boundaries of a governorate office and Court of First Instance in relation to land acquisition.

²¹ This study is prepared by the party requesting the expropriation or the consultant assigned by this party. It includes a description of the Project, the general planning drawing of the Project, the locations and areas of the real estate / lands to be expropriated for the benefit of the Project (whether it is public or private owned land), in addition to, the Project feasibility for the public benefit and confirmation that the Project is among the categories of public benefit projects mentioned in Article (2) of the Law 10, 1990.

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For the Project, the role of the governorate is represented in the directorates involved in the development of the Project that are administratively affiliated to the Alexandria governorate. For example, these Directorates would include:

- **ASD:** Responsible for conducting the survey of the lands included in the expropriation decree and issuing a list that includes the compensation value, the specified area planned for expropriation and the names of the landowners.
- **The Directorate of Housing and the Directorate of Real Estate Taxes in Alexandria:** In case of the existence of residential real estate mentioned in the Ministerial Decree of Land Acquisition due to Public Interest); and
- **Alexandria Directorate of Agriculture:** For the trees impacted within the alignment the Agricultural Directorate will be responsible for assessing and evaluating loss of trees.

The role of the Court of First Instance in setting the jurisdictional boundaries for land, the court is the competent authority that investigates any complaints (i.e. in relation to compensation value, the specified area planned for expropriation, the names of the landowners, etc.) raised by PAPs. The Survey Directorate is the party concerned with the receipt of objections / grievances related to the previous items and submitting them to the Court of First Instance in the jurisdiction area where the land acquisition takes place, and the court, in turn, files the lawsuit, if required.

3. Property Valuation

An evaluation committee was formed, headed by the Director of the Valuation Department from the ESA (Land Acquisition Entity²²) according to Law No. 10/ 1990 and its amendments by Law 187/2020, Law No. 24/ 2018 and Law No. 1/2015. The Committee is responsible for identifying the properties affected by a Project, as well as confirming the land/ assets location and land/ assets ownership (public/private), in addition to, estimating the initial land price. The compensation is usually determined in accordance with the prevailing price (the market price) for land in the vicinity of the land subject to expropriation. These prices are taken from recorded contracts that form a precedence in the Real Estate and Authentication Offices. It should be noted that the representatives of ESA are experts in evaluating land prices.

The Committee headed by the ESA issues an expert report that includes the value of land compensation. This procedure is completed for all the private land parcels included in the Project (the depot lands and the land parcels required for Bab Sharq and Sporting Stations).

The procedures for calculating the land price will be completed through a valuation survey carried out by a Committee from the ASD (this procedure has been completed for the depot land only, and it has been carried out in May 2022 for the lands parcels at Bab Sharq and Sporting stations) to identify the legal

²² According to the Egyptian Law 10, 1990, the ESA and the affiliated directorates in the different governorates are the entity responsible for land acquisition in Egypt for public benefit projects.

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status of affected properties with the property owner. Once a compensation calculation is determined, the Project owner (NAT) deposits the identified compensation amount. This procedure has been completed for the depot land only.

4. Disclosure of the Valuation Result

The valuation survey result (i.e., surface area, location, owner name, compensation evaluation) is disclosed at the governorate office of ESA and District offices for one month. Landowners will be informed of the valuation result via official letter. The Project description, venue and the duration of disclosure for the valuation results will be announced in the Egyptian Gazette, official journal and two daily newspapers for one week (It is expected this procedure will take place in June 2022 for the owners of the depot land).

5. Land Ownership Transfer

If there are no grievances raised, property ownership will be transferred to the Project owner NAT through the signing of a land ownership contract. Owners sign receipts for receiving compensation. Compensation must be received according to official documents.

The compensation is paid after the project owner (NAT) deposits the total compensation value, and the ASD prepares a list of owners that are disclosed in the newspapers and notifies the owners. Compensation must be paid first until the rest of the procedures are completed and ownership is transferred. No ownership transfer proceedings are conducted before the total compensation is paid.

6. Grievance

The legal avenues that can be employed for raising land acquisition related grievance can be considered under two levels.

1. Where the landowner requires further information with regards to the land acquisition requirements on subject land and other property (the legal status, the price of land, etc.), they are entitled to raise a grievance with the ASD office in particular the focal point responsible for grievances 15 days the land acquisition decision. Both the landowners and users are entitled grievance related to the valuation result.
2. Where the first avenue does not result in an agreement, the landowner and/or users would resort to take the issue to the court of first instance in Alexandria governorate (where acquisition will be conducted). Grievance is treated according to the Law No. 10/ 1990 and its amendments by Law 187/2020, Law No. 24/ 2018 and law No. 1/2015.

b) Steps to Bridge the Gap Between the Egyptian Law and International Lender's Requirements/ Standards (Informal Land Users) Formation of the Compensation Committee

The Compensation Committee is formed based on a request submitted by the head of the NAT to the Minister of Transport.

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The formation of the Compensation Committee is internal within NAT and as such is not a requirement according to the Law No. 10/ 1990 for Land Acquisition, but rather this is a mechanism adopted by NAT to bridge the gap between the Egyptian Law and international Lender’s requirements/standards.

The Minister of Transport approved the formation of the Compensation Committee for the Project on 24 February 2022 (**Appendix 2**). The role and responsibilities of the Compensation Committee are:

- Negotiating with informal PAPs (informal Users (21 PAPs) and vulnerable Groups which includes elderly, women and individuals with income at or below the poverty line) Categories that not included in Egyptian Law. The Compensation Committee engages with the PAPs to determine the value of impact on the subject asset(s) and determines a value for negotiation. The assessment works carried out by the Compensation Committee considers informal users of impacted assets as well as vulnerable groups. The Committee will propose compensation at full replacement cost or other livelihood restoration measures that replace and restore (if possible, improve) livelihoods before pre-Project levels;
- Receiving grievances, whether from (formal) landowners or informal users. The committee assists the official owners in communicating with the relevant government authorities to resolve the complaint. The ASD notifies NAT of all the objections / grievances submitted to them, in addition to the fact that, NAT follows up on all the procedures that take place to receive compensation on a regular basis with the ASD;
- Receiving any grievances related to compensation; and
- Conducting consultation activities with informal PAPs.

The Compensation Committee established to the Project consists of 11 members representing NAT (9 representatives), ENR (1 representative) and General Authority for Governmental Services - Ministry of Finance (1 representative).

4.2 Identification of Right Holders

The regulation of ownership rights according to Egyptian Law are guaranteed by the Constitution (Article 33 of the 2014 Constitution), as mentioned above. It is the Government of Egypt’s policy to pay compensation or offer assistance to people whose lands and properties are affected by projects undertaken by the Government. Amendments introduced to the 1990 Egyptian land acquisition law (Law 10/1990) through Law 24/2018 stipulate prior to the asset inventory, an appointment date will be announced publicly and “concerned parties” shall be notified in writing and “all owners and right holders” will be convened to appear before the responsible committee conducting the inventory on the Project site to identify/ clarify properties and ownership rights. Under this formulation, the scope of the Law has been expanded to include “right holders”, in addition to, formal owners however the definition of “right holders” in the context of this amendment remains unclear. It may be understood that right holders without formal ownership documents may be considered eligible for compensation, however the rights

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of the informal users (stationary and mobile vendors) remain unclear²³. In the Project, the owners and the land right holders were identified according to the formal ownership by the ASD. Although the statement remains unclear for informal users, the Project will comply with international requirements by undertaking necessary activities to identify and compensate informal users whose rights are not clearly defined under the law.

4.3 Identification of Informal Users and Vulnerable Groups

Egyptian legislation does not recognize the rights of informal users and vulnerable groups. Informal users and vulnerable groups (stationary and mobile vendors) within the train corridor were identified according to Lender’s requirements. A Compensation Committee (which is mentioned in **Section 7.1.2**) formed by representatives of ENR, Ministry of Finance and NAT have compiled a list of the informal users. Refer to **Chapter 6: Affected People and Assets** for further details. The RAP team verified the list and conducted a socio-economic survey of these informal users. A final list of Informal users was prepared on 29 May 2022. This process is described in more detail in **Chapter 5: RAP Methodology**.

4.4 Cut-Off Date

Lenders Standards/Requirements identify a cut-off date in order to avoid unjustified claims for compensation.

Although there is no cut-off date under the Egyptian laws, Article (22) of the Egyptian Law 10, 1990 states that: “any action or procedure that takes place on the land mentioned in the Ministerial Decree, such as constructing buildings, lease contracts, or planting crops/ trees after the Ministerial Decree has been published in the Official Gazette, will not be included in the compensation valuation.”

The cut-off date on the Project will differ according to the various components of the Project. The cut-off date for all assets falling within ENR property, namely the rented shops, the mosques and the copper factory land the date of publication of the land acquisition ministerial decree is considered the cut-off date is 19 November 2020, as well as the decision issued on 29 November 2021 for the lands of Bab Sharq and Sporting stations. Whereas the cut-off date for all informal mobile and stationary vendors is the date the Compensation Committee completes the inventory within the scope of the Project alignment and outside (May 17, 2022). Construction timeline is not anticipated to prolongate the duration between the cut-off date and construction commencement however, in the case where the duration between the cut-off date and construction commencement is prolonged, the Compensation Committee and NAT PMU will consider requests received after the cut-off date on a case-by-case basis to confirm whether the persons impacted have a valid basis for compensation and payment thereof.

²³ For more details, see Appendix 3 National Regulations Related to Involuntary Resettlement.

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4.5 Challenges of Land Acquisition

- **There are no specific and clear valuation methodology for land and property.** Although Egyptian Law requires the valuation be based on market prices at the time of land acquisition, there is no clear methodology for such valuation, and there are no unified and publicized guiding principles on how to determine the prevailing prices. Appropriate valuation methodology and criteria is based on full replacement costs, and the valuation method will be implemented as described in **Section 9.5 Valuation Process and Methodology in Chapter 9: Entitlements and Compensation.**
- **Lack of a unified institutional framework responsible for identifying all PAPs and evaluating compensation.** Law 10, 1990 and its amendments give the ESA and the affiliated governorate department the responsibility for implementing land acquisition for public interest projects. However, there is no unified institutional framework for taking responsibility for the census, asset inventory and compensation disbursement for both formal and informal PAPs. There is no mechanism/criterion for compensating the informal users of the land, or how to estimate the appropriate compensation. The method used both for formal and informal PAPs under this Project RAP are described in **Section 9.5 Valuation Process and Methodology in Chapter 9: Entitlements and Compensation.**
- **The gap in the implementation and sequence of land acquisition procedures.** Time factors and delays to navigate through a formal expropriation process. Land acquisition procedures take a long time. Where there is a significant gap between the cut-off date and RAP implementation, the Project carries the risk of additional right holders (both landowners and formal/informal users) to emerge, the validity of the valuation conducted for impacted assets, which may result in the need for updating the census and assets inventory. This is reflected in the Project implementation procedures, and creates concern among PAPs in relation to entitlements and potential change in property values. The cut-off date is detailed in **Section 4.4 Cut-off Date** in this chapter.
- **Grievance/objection period.** Law 10, 1990 and its amendments state that any complaints against acquisition should be resolved by the ESA. Affected parties are only allowed to file a complaint for 15 days after the final list of PAPs is published by the implementing agency (ASD). Landowners consider this time frame to be too short, and thus complainants tend to rely on courts for a final resolution of their complaints. This makes the grievance redress mechanisms very expensive and long-term. The project grievance mechanism is described in **Section 10.5 in Chapter 10: Information Disclosure and Consultations.**

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5. RAP METHODOLOGY

5.1 Approach to Land Acquisition and Resettlement

The RAP is founded on the data and information retrieved during the key steps listed below.

- Census aims to identify all those eligible for compensation and other forms of assistance resulting from the Project’s need to acquire land.
- Asset inventory is carried out to identify all land and assets in the project area at the time of the cut-off date that need to be acquired by the project.
- Socio-economic survey aims to determine and analyse the socio-economic conditions of individuals, households and businesses (formal or informal) which will be physically and economically displaced by the Project.
- Site visits carried out to collect information on the shops and residential areas externally adjacent to the Project alignment.
- Key Informant Interviews.
- Focus Group discussions.
- Valuation of affected assets focuses on identifying the value placed on an asset for the purpose of calculating compensation.
- Legislative review is carried out to identify applicable national laws and regulations, that are related to and set out provisions on land acquisition, resettlement and livelihood restoration. The review also includes a gap analysis that aims to identify any gaps between national legislation and standards/requirements of Lender’s involved in the Project. The legislative review will form the legal basis and mechanisms for entitlements and this is presented in **Chapter 3: Legal Framework**.

5.2 Objectives

The objectives of the socio-economic survey for the Project are as follows:

1. Collect baseline socio-economic data of the Project-affected land parcels, shops and businesses, in addition to, the households (if relevant) helping to identify and evaluate the environmental and social impacts, risks and opportunities of the Project in order to develop mitigation measures;
2. To identify and examine the ownership, quantity and quality of impacted immovables and livelihoods related to the Project, including: loss of access to businesses, housing, local services (where relevant);
3. To inform the suitable design of the RAP (including livelihood restoration aspects);

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4. To provide a pre-Project socio-economic and community perception baseline about the Project and monitoring indicators in order to track the progress and to determine whether businesses (shops, kiosks and vendors) and possibly households' wellbeing has been maintained and enhanced; and
5. To gather gender-related data and perceptions within the affected businesses (shops, kiosks and vendors) and possibly households in order to mitigate against gender-specific impacts and identify opportunities for women within the RAP.

This socio-economic survey sought to record information for all economically impacted businesses and possibly impacted households, as well as a sample of shops located externally adjacent or close to the Project alignment who may still be significantly affected by the Project activities. The corridor for the Project alignment differs between 13 to 30 metres in width.

5.2.1 Equipment and Tools Used to Collect Data

Data collection tools: The questionnaires developed were compatible for tablet data entry, as well as hard copy printing and manual completion. The surveyors were given the choice as to which is preferable for them. Most surveyors preferred using a hard copy after translating the questionnaires into Arabic, the questionnaires were reviewed by the RAP Team supervisor after their completion during the fieldwork to ensure they were applied correctly and had no gaps. SPSS was used for data entry and analysis by the RAP team.

Cameras: When surveys were completed face-to-face with vendors in stations and shops externally adjacent to the Project alignment, the surveyors were provided with cameras in order to photograph and geo-tag affected assets.

IT equipment: The RAP survey team possessed their own laptops/computers and the necessary software to carry out data entry, collation and analysis.

Georeferencing equipment: Surveyors were provided with GPS devices in order to establish the exact location of households and assets within the expropriation corridor.

Personal Protective Equipment (PPE) and safety equipment: In order to combat against COVID-19 and the risk of infection, surveyors were provided with hand sanitiser and face masks. They were also required to wear suitable walking shoes, sunhats and sunscreen, and were provided with water and high-visibility clothing. Risk assessments were carried out by the RAP team prior to survey commencement and updated where necessary throughout.

5.2.2 Number / Experience of Surveyors

The RAP team comprised 2 sub-teams (2 surveyors per sub-team) directed by a RAP Team supervisor.

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5.3 Socio-Economic Survey Methodology

5.3.1 Desk Study

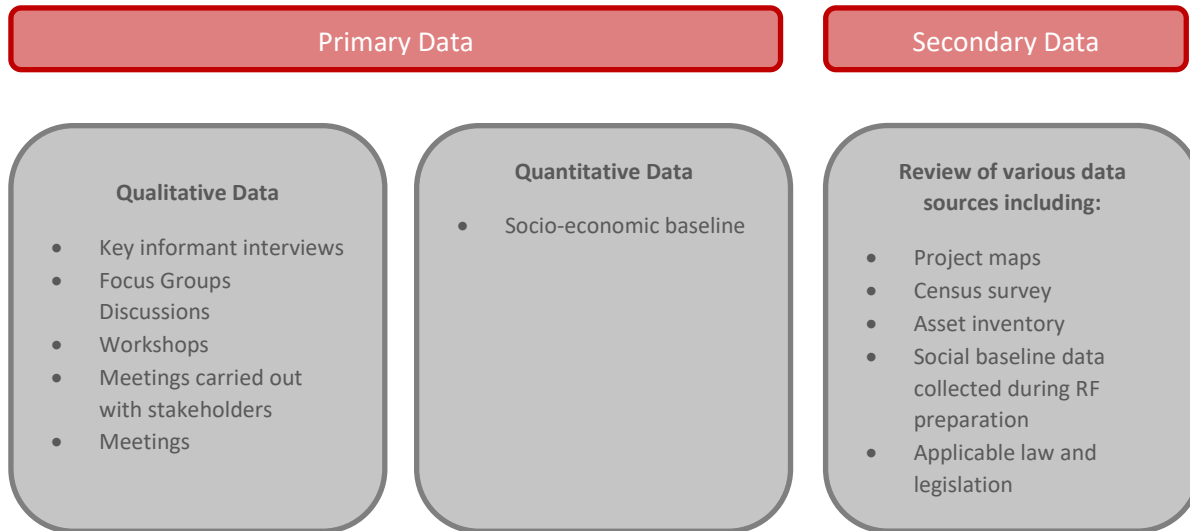
The socio-economic survey methodology developed for the Project is based on the information gathered from primary and secondary data sources. The survey methodology focuses on information made readily available at the time of RAP preparation with the effort of including all impact groups known into the scope.

Primary data was generated through a socio-economic survey and in-depth/key informant interviews carried out with PAPs, businesses and other stakeholders such as public agencies influential to the land acquisition process as well as community-based organizations, business associations, community leaders and other key local actors. Primary data was also informed by the workshops carried out with government officials during RAP preparation and focus group discussions held with PAPs e.g., tenants of shops, formal and informal vendors, and others impacted by the Project. Information collected through these tools (survey, in-depth/key interviews, workshops and focus groups) were analysed to generate social and economic data of the affected community members.

Secondary data used included: maps showing Project footprint; census survey and assets inventory data collected by ENR property department officials in Alexandria during the PAP inventory (October 2021); information gathered during resettlement framework preparation (2021); applicable law and legislation; other documentation related to land acquisition process; impacted groups which were provided by NAT, MOT, ENR; and other information gathered from reliable web-based sources. This would include information on shops owned by ENR in the existing stations, informal mobile vendors within the alignment, locations of the businesses/shops externally adjacent to the Project alignment (KMZ file showed general shop locations as shaded block locations with no specific indication of numbers) that may potentially be impacted by the Project. As of 5 April 2022, specific information on the number of landowners²⁴ and assets impacted within the depot land and two new stations (Bab Sharq and Sporting) and details that include the number and type of shops adjacent to the alignment are not available and still under preparation.

²⁴ The information received including limited information on the number of landowners. It only covers the landowners of the depot land, which includes El Nahas Company (affiliated the Ministry of Business Sector), the heirs of the Buhairi family (without specifying a number or names), and the heirs of the Gawish family (without specifying a number or names).

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Information collected both from primary and secondary data sources was used to formulate a phased approach in collecting socio-economic baseline data. In this respect, the survey consists of the following phases:

5.3.2 Phase 1

Conducting surveys with groups that include (total number of PAPs):

- Tenants of kiosks and cafeterias (owned by ENR) located within the current stations along the alignment (8 tenants);
- Informal users within the alignment (6 informal mobile vendors);
- Mosques impacted by project activities (13 mosques); and
- Other mobile businesses within the alignment (15 Stationary informal vendors).

5.3.3 Phase 2

Gathering information for phase 2, includes:

- Walk of site to determine types and number of shops adjacent to the alignment;
- Assessment of potential impacts on residential buildings and other social receptors along the alignment; and
- Identification of any other vulnerable groups along the alignment (if any).

After data was gathered during Phase 1, the RAP team conducted surveys with groups as part of Phase 2 as follows:

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- Owners of private lands within the newly added Bab Sharq and Sporting Stations (the site walkover in March 2022 confirmed there are no users of land for this site²⁵);
- Owners of private lands within the depot land (the walk of site in March 2022 confirmed there are no users of land for this site);
- Owners of shops externally adjacent to the Project alignment from Victoria Station to Mandara (a sample of shops likely to be significantly affected to be surveyed); and
- Residential areas along the alignment (that may potentially be impacted) – informed by Phase 1.

The socio-economic survey was carried out through face-to-face meetings with relevant PAPs.

In the proposed RAP development schedule, time has been allocated for survey preparation to ensure the full understanding of the methodology with the survey team. This includes the overall objectives and steps to promote the successful and efficient completion of the questionnaires.

The RAP team has prepared several questionnaires for each impact group that has been identified for the survey. The questionnaires aim to collect data on:

- The use of impacted land/immovable (through ownership, tenancy arrangements or informal use) including any activities carried out;
- Number and type of users that benefit from the land/immovable (owners, tenants, employees, informal users, vulnerable);
- Information on users such as demographics, socio-economic status, livelihood and income sources, means of transport and access to land/immovable impacted;
- Any vulnerabilities that may be multiplied by Project activities; and
- Level of awareness, perceptions and knowledge of the Project (including communications channels available and GRM).

NAT sent an official letter to Alexandria Governorate to communicate that the RAP Team would be conducting the socio-economic survey work from the week commencing 17 April 2022.

Key tasks in Socio-economic Survey – The following process was followed:

Face-to-face Socio-economic Survey



Identifying informal users. The RAP team was aware that there could be significant users who have not yet been identified in the previously undertaken RF and other information provided up to date from NAT

²⁵ Except for the economic activity of car wash on the Bab Sharq land parcels. The land was observed to be used as open air car park, with a corner occupied by a car wash.

for the preparation of the RAP. These users (if any) were identified during the site visit conducted along the alignment, and during the socio-economic survey.

In cases where a single shop is rented from ENR to a company owned by multiple parties, the lead party completed the survey. Additionally, where any of the shop vendors have employees, a separate employee survey was carried out. The survey(s) identified all beneficiaries and those with income generating activities related to these businesses. The entitlement matrix included measures for all impact groups.

Data Recording

Survey questionnaire. Questionnaire templates for identified impact groups were developed based on RAP team experience in designing and conducting socio-economic surveys in line with EBRD’s Resettlement Guidance and Good Practise Handbook and best international practice.

The survey team made use of encryption tools and procedures relating to data collection for the Project as part of the technical and organizational security measures. It was ensured that personnel gathering and processing personal data were suitably informed, trained, and instructed in respect of Data Protection Legislation as well as obliged in writing to adhere to data privacy regulations under Data Protection Legislation and committed themselves in writing to confidentiality.

The survey team appointed a data protection officer in the Project implementation process, and provided a code for each questionnaire by NAT. This ensured that the survey team was not in possession of any name information for the PAPs. All questionnaire information was saved into the database under this code. The surveyors did not take the name of the PAPs, just their codes and only data linked to codes, and not names, were stored.

The survey team used an encrypted data storage system for this Project. All the questionnaires were available in this system.

Contact information for the survey team was provided to the survey respondents, in the event that respondents wanted to ask any questions after the survey was completed. Any concerns/feedback of participants were recorded and addressed.

Entry, filing and analysis. The RAP Team ensured that all questionnaires were properly filled out, inserted into the database matrix, and filed by surveyors through daily meetings and reviews. The RAP team had real-time access to this database and provided comments on data entry if required. Further, surveyed impact groups were clearly marked on the database (including the identity of their surveyor) to ensure no double-counting and to reduce the potential for speculative claims.

The RAP team carried out a daily verification protocol on the data gathered, identifying outliers (e.g. numbers that are clearly out of range) and following up with the relevant surveyors. This ensured that the surveyors are properly collecting and entering the data, ensuring proper understanding of the process and avoiding systematic errors.

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Risks and Mitigation Strategies

The RAP team identified a number of potential challenges in carrying out the above methodology. Below is a list of these risks, as well as their proposed mitigation strategies:

Potential Risk to the Survey	Mitigation Measures
Not all shop vendors may be present at the time of the survey.	Contact details for the shop vendor were obtained and followed up to arrange a suitable date and time for questionnaire to be completed within the planned timeframe.
Mobile vendors outside the stations within the alignment may not always be present.	The phased approach adopted allowed for the survey team to visit the site twice to collect this information. Where mobile vendors were found at the time of the survey, mobile vendors and surrounding shop vendors present were consulted by the RAP team to gain information on mobile vendors that were not be operating on site on that particular day.
PAPs may refuse to take part in the survey due to the request for personal information, or that women may feel uncomfortable talking to surveyors.	The survey team highlighted to the PAPs the necessity of carrying out the survey, in order for them to be eligible for compensation. Confidentiality of all information was assured by the RAP team, and the letter of permission from NAT was shown. There was also 2 female surveyors in the RAP Team for any female PAPs who would prefer speaking to a female.

5.3.4 Methodology for Selecting a Sample of Shops and Houses Externally Adjacent to the Project Alignment

The design of the Project, as well as the Project’s needs for the land parcels that have been identified so far, do not require the removal of any houses or shops externally adjacent to the Project alignment. However, residents of apartment buildings and tenants of shops have been added to the affected group given the possibility that they may be impacted by construction activities at a later stage and, if this is the case, are eligible for compensation as specified within the entitlements matrix covered by the EPC contractor. The EPC contractor will be required to provide compensation as defined in this RAP and also as an obligation to the EPC contract which aligns with the Civil Code that protects property rights and compensation for any PAP in the event of damages. The NAT PMU will be responsible for following up the compatibility of compensation with the RAP. NAT will be responsible of covering all damages and other impacts that will not be covered under the EPC contract in order to comply with lender requirements.

Shops Sample

The shops adjacent to the Project corridor are located in the following station areas: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and to El Montazah. These are the areas in which the Alexandria Metro alignment will be elevated (i.e., the viaduct area).

The RAP Team surveyed the shops/ buildings externally adjacent to the Project alignment through the most recent satellite data available (up to December 2021). The following table shows the results of the survey according to the areas between the stations.

Table 5-1 Approximate Numbers of Shops/ Buildings Adjacent to the Project Alignment

N	Station/Segment	North/South	Number of Identified Shops ²⁶
1	Victoria Station – Mohamed Naguib Station	North Side	50 – 70
2	Victoria Station – Mohamed Naguib Station	South Side	10 – 15
3	Mohamed Naguib – Sidi Bishr Station	North Side	65 – 85
4	Mohamed Naguib – Sidi Bishr Station	South Side	8 – 13
5	Sidi Bishr Station (within its vicinity)	N/A	2-3
6	Sidi Bishr Station – Miami Station	South Side	11-17
7	Miami Station – Asafra Station	South Side	15-20
8	Asafra Station (within its vicinity)	N/A	5-10
9	Asafra Station – El Mandara Station	South Side	32-39
10	El Mandara Station to El Montazah	South Side	35-40

The above quantifications are for areas highlighted by a white Polygon in the most recent version of the Project alignment produced as a KMZ received from SYSTRA²⁷. The structures have been defined as shops but they may not necessarily be shops as there is a possibility some of the identified spaces are workshops or storage areas (not possible to validate through satellite data).

²⁶ Approximations made based on Google Satellite Hybrid and ESRI Satellite Geodata.

²⁷ NAT stated that the shops externally adjacent to the Project alignment will not be affected by establishment of the Project. Meaning that the shops will not be removed, and in the event that the Project design in any section will affect the shops, NAT will work with the consultant (SYSTRA) to change the design in order to conform to the principle of not removing the shops due to the Project. Accordingly, SYSTRA identified the areas of the shops located externally adjacent to the Project alignment corridor, which may be affected during the construction period.

According to the data of the previous table, the RAP Team drew a sample of 20% of the total maximum number of shops in each area, so that the total sample of the study from the shops is 62 shops distributed over the different regions according to the following table.

Table 5-2 Distribution of the Shop Study Sample

N	Station/Segment	Maximum Number of Shops	20% of the Max
1	Victoria Station – Mohamed Naguib Station	70	16
2	Victoria Station – Mohamed Naguib Station	15	3
3	Mohamed Naguib – Sidi Bishr Station	85	18
4	Mohamed Naguib – Sidi Bishr Station	13	2
5	Sidi Bishr Station (within its vicinity)	3	1
6	Sidi Bishr Station – Miami Station	17	3
7	Miami Station – Asafra Station	20	4
8	Asafra Station (within its vicinity)	10	2
9	Asafra Station – El Mandara Station	39	8
10	El Mandara Station to El Montazah	40	8
Total		312	65



Shops in Miami area



Sidi Bishr Area

Figure 5-1: Shops outside the Project alignment adjacent to the railway fence.

The RAP Team has taken into account the diversity in commercial activity of the shops that was included in the study sample.

House Sample

The Project route passes through the urban residential and commercial areas of Alexandria through four districts in Alexandria Governorate: Montazah Awal, Montazah Tany, Al Sharq, and Wasat, as illustrated in the following table.

Table 5-3: Metro Stations Distribution According to the Administrative Division of Alexandria Districts

District	Stations
Montazah Tany	El Islah, El Maamoura, Toson, Abu Qir.
Montazah Awal	Mohamed Naguib (New), Sidi Bishr, Miami (New), El Asafra, El Mandara, El Montazah.
Sharq	Kafr Abdou (New), Al Zahiria, El Souqh, Ghebrial, Victoria.
Wasat	Alexandria/ Misr (New), Bab Sharq (New), El Hadra, Sporting (New), Sidi Gaber.

Some sections of the Project alignment are close to houses and may be affected by construction activities. It should be taken into account that the houses that are most likely to be affected by construction activities are the houses located in the areas in which the Project alignment will be elevated (the viaduct section), given that the construction work includes excavation, which may affect nearby buildings depending on the construction condition of the building. No household or businesses are anticipated to be relocated due to noise and vibration during construction. The EPC contractor will be informed of the RAP requirements and will be in closely monitored by NAT if any grievances due to noise and vibration are received to identify if any damages occur or need for relocation arises. Provisions of the RAP will be implemented and monitored by the NAT PMU, thus under any cases where disturbance of damages from construction appear, the EPC will be required to comply with compensation payments stipulated by law and where necessary by the request of NAT meet requirements set out in the RAP.

NAT confirms that construction will be pre-planned, taking into account the condition of the existing buildings, through the geotechnical study that will be prepared by the EPC contractor, who will survey the condition of all houses near the construction sites prior to construction commencing. The EPC Contractor will also be responsible for using construction techniques to avoid damage and, in the event damage does occur, will compensate and repair such damage, if required.

According to the site visits conducted by SYSTRA during the preparation of the environmental and social studies for the Project, some areas in the viaduct section were identified as houses close to the Project alignment, which are: Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra. If the risk of damage to houses exists, this will be documented by SYSTRA, referred to in the tender documents to the EPC Contractor and disclosed to potentially affected people. Therefore,

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the EPC Contractor is responsible for considering any potential risk to buildings and to mitigate such risks accordingly through the development of the design as the Contract is Engineering, Procurement and Construction.

The RAP Team selected 5 houses from each of the areas located at/between the aforementioned stations, according to how close they are to the Project alignment with a total sample of 40 houses.

The survey was applied to one apartment in each residential building. The following photos show the houses near the Project alignment in the viaduct section.





5.4 Other Information

It should be noted that the information gathered in this socio-economic survey has been supported with information gathered from multiple focus groups to be undertaken, as well as consultation activities with relevant state authorities and other stakeholders such as NGOs.

Furthermore, the socio-economic baseline gathered from the survey (and used to develop monitoring indicators) was used in conjunction with existing primary and secondary data for the Project area and included official statistics, as well as liaison with the Ministry of Labour to determine vulnerable groups in the area.

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6. AFFECTED PEOPLE AND ASSETS

6.1 Socio-Economic Background

The socio-economic baseline for PAPs described below is based on the results of socio-economic surveys, key informant interviews (KIIs) and focus group discussions (FGDs) conducted during April and May 2022. The following field activities and interviews were conducted to collate accurate socio-economic baseline information for this chapter:

- **32 landowners** and their representatives (which are a representative sample from the total landowners) were interviewed to collect data on affected land users and owners (May 2022);
- **8 tenants** (full census) of kiosks and cafeterias (owned by ENR) located within the current stations along the Project alignment (all business owners fully completed the survey questionnaire);
- **21 informal users²⁸** (full census) within the Project alignment (all PAPs fully completed the survey questionnaire), including:
 - 15 Stationary informal vendors;
 - 6 Informal mobile vendors;
- A sample of **65 shops** externally adjacent to the Project alignment (98.5% of the respondents to the survey questionnaire were the business owners, with the exception of only 1 respondent who was a shop employee);
- A sample of **40 households** externally adjacent to the Project alignment (55% of respondents to the household questionnaire out of the total sample were head of the household, whilst the remaining 45% of survey respondents were completed by the wife as the head of household was not present at the time of the survey);
- **4 FGDs** were undertaken with the PAP groups to understand the community's views on the Project, as follows:
 - 2 FGDs with tenants of the shops externally adjacent to the Project alignment corridor to obtain their opinions about the Project and their concerns;
 - 2 FGDs with women-only focus groups to develop a greater understanding of gender-related issues within the surrounding Project area, potential impacts on women in affected communities and their views of the Project.

²⁸ These are not shops but rather informal users of the right of way that include some wooden kiosks/vegetable and fruit vendors located at the crossings.

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- **Walk through of the route.** The RAP team conducted two rounds of walk throughs of the Project alignment corridor, the existing stations, and the adjacent streets outside that run in the parallel to the Project alignment corridor. The first walk-through took place during the day (10 am - 4 pm), with the second round during the evening (7 pm to 10 pm) on 17-24 April 2022. The aim of the two rounds of walk-throughs was to:
 - Verify and update the PAP inventory received from ENR;
 - Identify any other PAPs who were not included in the PAP inventory;
 - Walk the Project alignment to determine types and number of shops externally adjacent to the alignment,
 - Identify the residential buildings adjacent to/ or closest to the Project alignment that may be affected by construction activities;
 - Identify any other vulnerable groups along the Project alignment (if any);
- RAP team conducted **KIIs** (March 2022) with government agencies responsible for land acquisition procedures and compensation valuation (the Egyptian Survey Authority (ESA) and Alexandria Survey Directorate (ASD)), in addition to, 2 active NGOs²⁹ in Alexandria. As well as the Directorate of Endowments in Alexandria (May 2022) and the Community Development Association in Alexandria (June 2022);
- RAP team Visited **13 mosques** that will be removed as part of the Project and conducted a meeting with the Directorate of Endowments in Alexandria to find out what steps have been taken to date to compensate the mosques that will be removed; and
- Updating the **assets inventory** conducted by the ENR Property Department in Alexandria for shops located within the existing stations and the Informal users within the Project alignment.

The activities of stakeholder consultations conducted, FGDs with shops externally adjacent to the Project alignment corridor and women-only focus groups were documented.

6.2 Administrative Structure and Population Characteristics

The proposed Project passes through four districts of Alexandria Governorate, namely: Montazah Awal, Montazah Tany, Al Sharq, and Wasat, as illustrated in **Figure 6-1: Metro stations distribution map according to the administrative division of the Alexandria districts**. The Metro stations distribution along the Project alignment by district are presented in **Table 6-1** below.

²⁹ Caritas and Young Men Christian Association (YMCA) NGOs.

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Table 6-1: Metro Stations Distribution According to the Administrative Division of Alexandria District

District	Stations
Montazah Tany	El Islah, El Maamoura, Toson and Abou Qir.
Montazah Awal	Mohamed Naguib (New), Sidi Bishr, Miami (New), El Asafra, El Mandara and El Montazah.
Sharq	Kafr Abdou (New), Al Zahiria, El Souqh, Ghebrial and Victoria.
Wasat	Alexandria/ Misr (New), Bab Sharq (New), El Hadra, Sporting (New) and Sidi Gaber.

The Mediterranean port city of Alexandria was developed on a narrow strip of land ranging from 1 to 5km in width, bordered by the Mediterranean Sea to the north, and by Lake Maryout to the south-east as well as agricultural land on the South-West. The eastern section of the city was initially developed, with expansion to the east and west to accommodate both residential and industrial needs. Today, the city stretches over 60 km along the Mediterranean coast.

The following is a description of the land use within the Project area according to the proposed segments of the Project alignment and their respective administrative districts.

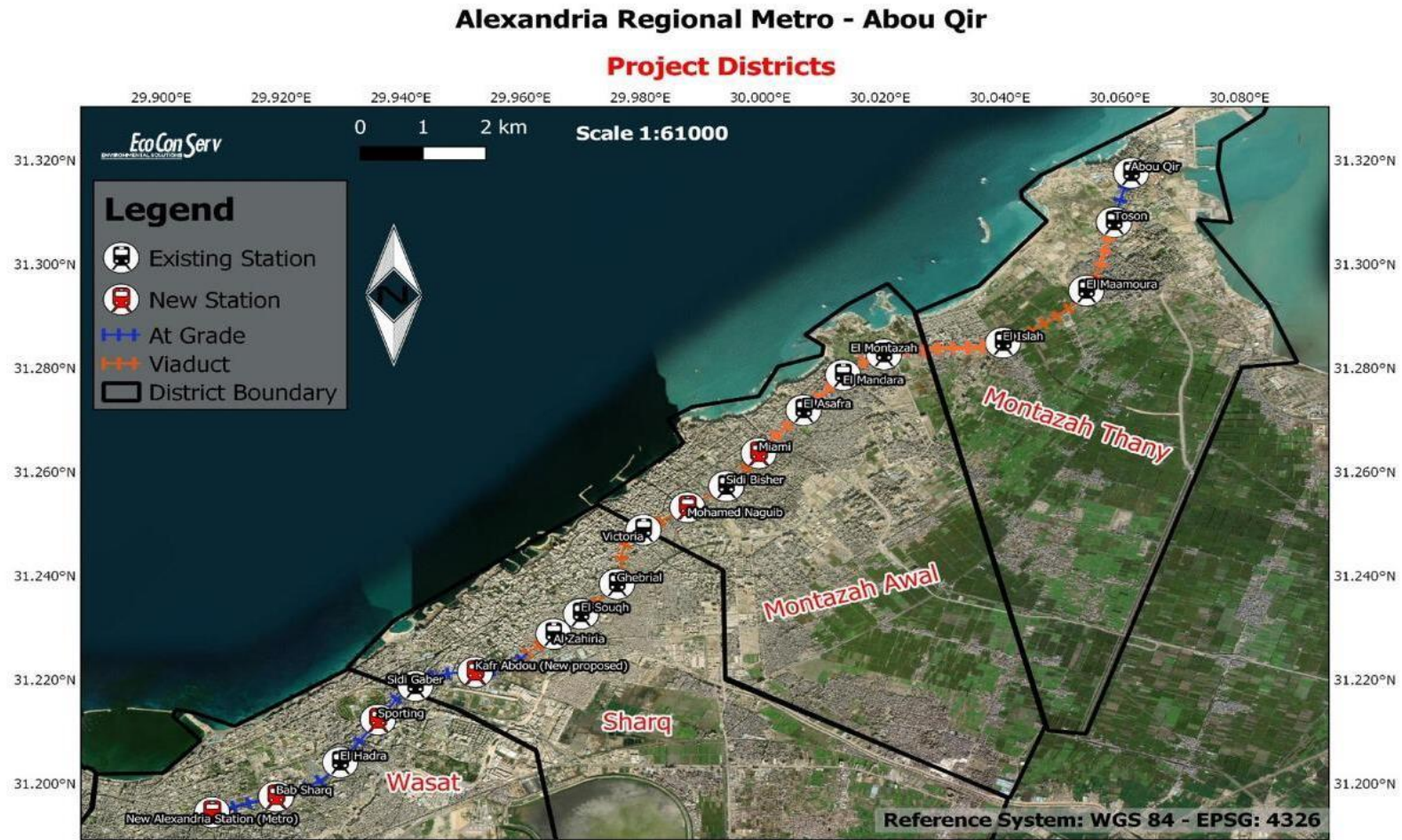





Figure 6-1: Metro stations distribution map according to the administrative division of the Alexandria districts.



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Table 6-2: Socio-economic Characteristics of the Local Communities along the Project Alignment³⁰



Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
<p>Montazah Tany</p> <p>Approximate Chainage: 5.57km</p> <p>Distance from the Project Alignment: The distances in this segment vary from a minimum of 7m up to 30m between the Project alignment and the surrounding facilities in some areas.</p>	<p>(Abou Qir – Mamoura): The proposed Project alignment, begins its journey at Abou Qir Station, making its way through Toson Station and El Maamoura Station in the Montaza Tany District. The Montaza Tany District is a 30 km urban District, southeast of the Alexandria Governorate by the coast. It is a hub for students due to the presence of the Arab Academy for Science and Technology for higher education and College of Physical Education for Boys, which are located to the south-west of Toson Station. Additionally, numerous schools for pre-higher education learning such as the Brigadler School and Dream Language School are located west of the Project alignment between the Toson Station and El Mamoura, with the Shaheed Elementary School located east of El Maamoura. Beyond the educational facilities are numerous government services and facilities located in the district. This includes the Abou Qir Central Hospital west of the Project alignment between Abou Qir Station and El Maamoura, the Abou Qir Health Insurance Hospital, as well as the Toson Health Insurance Hospital. Additionally, government services and buildings are present such as the Montaza Tany Police Station, in addition to, the offices of the Global Certification Bureau, Montaza Traffic Licenses Unit, Marine Officers Union and Drinking Water Mamoura Station located west of Section A of the Project alignment.</p> <p>District Population:</p> <ul style="list-style-type: none"> Total Population: 541,430; Male: 279,306; Female: 262,124; and Number of Households: 143,956. 	 <p>Figure 6-2: The cafeteria in Abou Qir Station.</p>



³⁰ The data presented in this table was used in identifying potentially affected groups by the Project, who were covered within the socio-economic survey methodology as described in **Chapter 5** and analysed/presented in the results of the survey in **Chapter 6: Affected People and Assets** to be taken into account in the entitlements matrix (**Section 9.2 in Chapter 9: Entitlements and Compensation**).



Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>The part of the Project alignment located within the Montaza Tany District does not require any land acquisition for any private land parcels, it is limited to land owned by ENR. Although this segment of the Project alignment is about 26% of the total Project alignment length, it is not the highest in terms of population density. This segment includes about 14.2% of informal users identified from the census, asset inventory and socio-economic survey within the Project alignment (3 Stationary informal vendors). There is only one cafeteria in the segment of the Project alignment at Abou Qir Station.</p>	 <p>Figure 6-3: The segment between Toson Station and Abou Qir Station.</p>  <p>Figure 6-4: The segment between El Mamoora Station to Al Montaza Station in the Montazah Awal district.</p>



Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p>Figure 6-5: The segment between El Mamoura Station to Al Islah Station.</p>  <p>Figure 6-6: The segment between El Mamoura Station to Al Islah Station.</p>



Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
<p>Montazah Awal</p> <p>Approximate Chainage: 5.19km</p> <p>Distance from the Project Alignment: The distances in this segment of the Project alignment vary from a minimum of 10m up to 20m in some areas between the Project alignment and the surrounding facilities.</p>	<p>(El Montazah - Mohamed Naguib): The Montaza Awal District, Alexandria’s most densely populated district, is home to numerous landmarks including the Montaza Palace and Montaza Garden, located east of the El Montazah Station. Additionally, to the west of the Project alignment, a variety of schools can be found, namely, the Egyptian Alexandria Academy, as well as the Kuwait School. The next station, El Mandara Station, provides a gateway to a variety of medical facilities (such as the Mandara Specialized Hospital to the west), the Mandara Water Company and Mandara Police Station to the east with the Alexandria Electricity Company located in the mid-western point between El Asafra and Sidi Bishr stations.</p> <p>The Asafra neighbourhood is located in this district comprising a densely populated informal neighbourhood where numerous vendors, coffee shops and kiosks operate. The Asafra neighbourhood includes the Manaret Alasfra Hospital west of El Asafra Station. The Montaza Social Affairs Office is located to the east of the Sidi Bishr Station. The district is famous for its unique natural features, evident in its palm trees, flowers and public parks. The Project alignment follows the Mediterranean Sea, and curves along with the coast from Montazah District continuing on to Sharq District.</p> <p>District Population:</p> <ul style="list-style-type: none"> Total Population: 1,044,142; Male: 505,428; Female: 538,714; and Number of Households: 267,792. <p>The segment of the Project alignment located within the Montaza Awal District does not require land acquisition for any private land parcels, it is limited to lands owned by ENR. This segment comprises about 24% of the total Project alignment length and is the most densely populated. In addition, about 28.6% of affected informal users are present in this segment of the Project alignment (5 Stationary informal vendors and 1 Informal mobile vendor). 1 kiosk and 1 cafeteria are situated within Sidi Bishr Station.</p>	 <p>Figure 6-7: The segment between the new Miami Station and El Asafra Station.</p>  <p>Figure 6-8: The segment between Sidi Bishr Station and Mohamed Naguib Station.</p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>This segment of the Project alignment includes a large percentage of the shops outside the corridor but adjacent to the Project alignment route. All entrances to the shops overlook the street parallel to the Project alignment corridor, and not the Project alignment corridor itself.</p>	 <p>Figure 6-9: View of El Asafra community area parallel to the Project alignment corridor.</p>
<p>Sharq Approximate Chainage: 4.58km Distance from the Project Alignment: The distances in this segment of the Project alignment vary from a minimum of 5m up to 15m in some areas between the Project alignment and the surrounding facilities.</p>	<p>(Victoria - Kafr Abdou): The Sharq District is an active region in the city, providing residents with educational facilities, culture and governmental support. Section 3, which starts at Victoria Station, is most notably known for Victoria College, a private British school founded in 1902. The school is still active today, providing students from affluent backgrounds with a liberal arts education. The district remains crucial to students across the city, particularly for university students. This is largely due to the presence of the main faculties belonging to Alexandria University, such as the Faculty of Fine Arts and the Faculty of Agriculture. Between Ghebrial Station and El Souqh Station, the Princess Aziza Fahmy Palace and Royal Jewellery Museum, two popular tourist destinations, can be located east of the Project alignment. Additionally, both a Police Department and Police Station are present to the west of the Section B route.</p> <p>The Sharq District is a concentrated hub for medical facilities and resources, with the Section B Metro alignment providing a gateway to approximately 20 hospitals. Victoria Station is surrounded by numerous medical institutes, with the Victoria Hospital to the west of the Project Alignment and El Ekbal Hospital, City Hospital and Loran Hospital to the north-east. There is a</p>	

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>large cluster of 15 both private and public medical institutions located within close proximity to one another between Victoria Station and Ghebrial Station and to the east of El Souqh Station and Al Zahiria Station. This includes the Alexandria Specialized Hospital, German Hospital, Al Ahly Hospital and El Shorouk Hospital. Additionally, a medical centre is situated to the west of Al-Zahiria Station. These health and educational services are distributed over the total area of the District and not concentrated in the area adjacent to the Project alignment.</p> <p>District Population:</p> <ul style="list-style-type: none"> • Total Population: 1,158,822; • Male: 593,361; • Female: 565,416; and • Number of Households: 310,615. <p>The part of the Project alignment located within Sharq District area includes private land acquisition activities. In addition to the ENR property, this part includes the depot land and Kafr Abdo station. Although this segment represents about 24% of the Project alignment length, it is the highest in terms of population density, as well as the highest in terms of PAPs, this segment includes about 57.1% of the informal users within the alignment (7 Stationary informal vendors and 5 Informal mobile vendors). It also includes 1 shop in Victoria Station, 1 kiosk in El Souqh Station and 1 cafeteria in Al Zahiria Station.</p> <p>This part includes the largest percentage of the shops adjacent to the Project alignment, especially in the Victoria area. All entrances to the shops overlook the street parallel to the Project alignment corridor and not the Project alignment itself.</p> <p>This part also includes the apartment buildings closest to the Project alignment in the Al Zahiria, Ghebrial and Bakoos (El Souqh Station area). According to the field work and the results of the FGDs with women, women mentioned the existence of activities such as the sale of drugs and abuse inside the Project alignment corridor. Women reported that one of the positive impacts of the Project is that it will create open space beneath the new Viaduct, and this area will not be a target for this type of activities that are unacceptable to the community especially women.</p>	 <p>Figure 6-10: View of Victoria Station.</p>  <p>Figure 6-11: One of the mobile vendors at El Souqh Station (fish seller).</p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p>Figure 6-12: Apartment buildings externally adjacent to the Project alignment corridor in the Ghebrial community area.</p>  <p>Figure 6-13: Proposed depot land and new Kafr Abdo Station location.</p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
<p>Wasat</p> <p>Approximate Chainage: 5.80km</p> <p>Distance from the Project Alignment: The distances in this segment vary from a minimum of 8m up to 35m between the Project alignment and the surrounding facilities in some areas.</p>	<p>(Sidi Gaber - Alexandria/ Misr): The Wasat District is an educational hub for many students in Alexandria. The area provides pre-higher education for students at language schools, international schools and public schools. Moreover, university students in this district benefit as the Faculty of Commerce and Faculty of Law belonging to Alexandria University are located in this area. The majority of educational facilities are located near to El Hadra Station, particularly to the east of the Project alignment. Additionally, the new Bab Sharq Station, which will follow El Hadra Station, will be located in close proximity to the largest educational cluster in the district, providing students attending over 20 different schools with access to public transport.</p> <p>In addition to providing community members with diverse educational facilities, the Wasat District is also a cultural hub with the presence of institutions such as the Alexandria National Museum, the Greco Roman Museum, Museum of Fine Arts and the Bibliotheca Alexandrina to east of the proposed new Bab Sharq Station. Additionally, the city’s most prominent medical institutions (such as the Gamal Abdelnasser Hospital) are located in the Wasat District. Numerous government service offices such as the Electronic Portal Office Governorate of Alexandria, Smouha Health Bureau and Local Government Office are located to the west of Sidi Gaver Station and El Hadra Station.</p> <p>District Population:</p> <ul style="list-style-type: none"> Total Population: 543,405; Male: 273,479; Female: 269,926; and Number of Households: 148,238. <p>The Project alignment located within Wasat District includes private land acquisition activities. In addition to the ENR property, this part includes the expropriation of land parcels to be used for the development of Bab Sharq and Sporting stations.</p> <p>Although this section represents about 26.4% of the total Project alignment length (the longest segment), it is the least densely populated. This section includes only 2 kiosks in Sidi Gaber Station but does not include informal users within this section of the Project alignment.</p>	 <p>Figure 6-14: Kiosk in Sidi Gaber Station (PAP).</p>  <p>Figure 6-15: Land parcel to be used for the development of the proposed Bab Sharq Station.</p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>This section does not include shops externally adjacent to the Project alignment corridor. Although, a few apartment buildings are situated outside but close to the Project alignment corridor within the vicinity of El Hadra Station, the apartment buildings are closer to the alignment of another railway line.</p>	 <p>Figure 6-16: Land parcel to be used for the development of the proposed Sporting Station</p>  <p>Figure 6-17: View of the end of the Project alignment at Alexandria/ Misr Station.</p>

6.3 Characteristics of Affected People and Businesses

6.3.1 PAP Distribution along the Project Alignment

The following PAP categories have been identified based on the socio-economic survey and the two rounds of walkthroughs along the Project alignment carried out by the RAP team. These categories also align with the information presented in the RF prepared for the Project, the land acquisition ministerial decree that was issued for the Project and the ENR inventory.

Table 6-3 PAP Categories for the Project

PAPs Categories			Number of PAPs
Primary PAPs³¹			
Owners of private land parcels	The Depot land	El Nahas Company ³²	1 Company
		Heirs of the Gawish family	About 184 persons ³³
		Heirs of the Behairi family	About 12 persons
	Bab Sharq Station land parcel		Heirs of Mohamed Abdullah Abdul Halim (6 persons)
	Sporting Station land parcel		Heirs of Mohamed Ramadan Awad Allah (4 persons)
Formal tenants of shops located inside stations			8
Informal users within the Project alignment³⁴	Stationary informal vendors		15
	Informal mobile vendors		6

³¹ The primary PAPs are those who will be affected by the Project either due to their land parcels being acquired or where their economic activities and livelihoods would be affected due to Project activities.

³² El Nahas Company is affiliated with the Ministry of Business Sector.

³³ The numbers in this table for the affected landowners are according to the results of the socio-economic survey conducted by the RAP team. These are representatives of the landowners for the land parcels subject to survey, not according to the owners' lists issued by the ASD, which has not as yet been issued.

³⁴ The walk through of the Project Alignment corridor by the RAP team showed that there are no residents/homeless people living inside the corridor. However, there are reports of two residents of Al Zahiria area who sort the waste on an ad hoc basis that the area residents throw into the train corridor, pick up cartons, plastic water bottles, etc., and store them inside the train corridor until they are transported by the municipality. The two waste pickers do not receive any support from the municipality. ENR officials have made reports and put measures in place to discourage waste pickers to come into the area designated for the maintenance of the train tracks and put their lives at risk. The Compensation Committee and RAP team field visits did not identify any waste pickers within the Project alignment. In the event that they are present during any upcoming Compensation Committee site visits, any identified waste pickers (if present) will be consulted and their case will

PAPs Categories	Number of PAPS
Potentially Affected PAPs³⁵	
The Shops externally adjacent to the Project alignment corridor	A representative sample of 65 Shop (a 20% sample from the total number of shops)
The Households externally adjacent to the section of Project alignment corridor planned for the viaduct	A representative sample of 40 Household (5 apartment buildings from each area located in/ between stations Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra, according to how close they are to the alignment corridor)

6.3.2 Owners of private land parcels

Private land parcels are included in the land acquisition ministerial decree. The decree includes three land parcels privately owned, none of which are held in individual ownership (i.e. all land parcels are owned by multiple shareholders who are heirs to the subject land). The RAP team held two meetings with a number of landowner representatives of all shareholders of the parcels to be acquired, in addition to, visiting the land parcels to assess their characteristics and condition at the time.

Land use

Table 6-4 summarises the use and area of the private land parcels that are currently planned for expropriation.

Table 6-4 Private land use and area

Land	Use	Area ³⁶
Depot land	The landowners of the proposed depot land confirmed that the land is non-agricultural (no crop production) and currently not used for any purpose. Part of the depot land is occupied by El Nahas Company comprising a factory building and an administrative building which in total is 185,525 m ² . The factory is not currently in operation. In addition, there are approximately 5 palm trees on the land.	The area belonging to the heirs of Gawish and Buhairi families: 18,911 m ² . El Nahas Company: total area is 185,525 m ² .

be studied, with the aim of estimating the economic impact on them, and how to provide support and assistance to them, given that they would be classified as a vulnerable group below the poverty line.

³⁵ These PAPs were not identified during the preparation of the RAP, but may be affected in the future by construction activities. A sample of this category was selected from certain areas according to their proximity to the Project alignment as described in **Chapter 5: RAP Methodology** and **Section 5.2** of this Chapter.

³⁶ The areas of land indicated in this table are as reported by the landowners not taken from the official valuation reports from the ASD (these are currently awaited).

Land	Use	Area ³⁶
		The total Depot area is 204,436 m²
Bab Sharq Station land parcel	The land parcel to be used for the development of the new Bab Sharq Station is currently used as an open-air parking area. In addition, the southwest corner of the land parcel entrance is used as a car wash. According to the landowner representative, the land is rented to a formal tenant to provide car wash services; the monthly cash return from the land is 45,000 EGP as verbally communicated during the survey. There are no plants or trees planted on the land, but there is a security guard room with water supply, wastewater and electricity facilities. The landowner representatives confirmed that the total land area is greater than the area required to be expropriated for the Project, and that the remaining land area after expropriation will be unviable and not suitable to be used for other purposes.	632 m ²
Sporting Station land parcel	The land parcel to be used for the development of the new Sporting Station is currently used as an open-air area to park cars belonging to the landowners. In addition, part of the land is used to store some building materials also owned by the landowners. According to the landowner’s representative, the land parcel is not currently rented and is not used for any activity other than what has been mentioned. There are no plants or trees present, but there is a security guard room with water supply, wastewater and electricity facilities.	887 m ²

Legal Status of Land Parcels

All landowners confirmed that their landownership is legal and they hold the legal documents and ownership contracts to confirm this to be the case³⁷. They also mentioned that their land parcels are of value due to their location resulting in increased land value over the past five years.

6.3.3 Tenants of Shops Located in Stations

The RAP team conducted a socio-economic survey of all the shops located in the existing stations, which were identified during the 2 rounds of Project walkthroughs of all the existing stations, the ENR inventory and the final inventory of the Compensation Committee.

The results of the socio-economic survey conducted by the RAP team for formal shop tenants is shown in **Table 6-5** below.

³⁷ The consultant did not receive the ASD's report, which includes the names of the landowners, except for the depot land’s report, which includes the names of Gawish family and Behairy family. The landowners of Bab Sharq and Sporting were identified through the site visit, and information was obtained from the security gatehouse on the name of the landowner and how to communicate with him.

Table 6-5 Socio-Economic Characteristics of Tenants of Shops Located in Stations

Total Number	Business Type	Location	Legal ³⁸ Status
8	Selling mobile accessories and supplies (1 Shop)	Victoria Station	Tenant with formal lease agreement
	Selling haberdashery, drinks and sweets (2 Kiosks)	Sidi Gaber Station	Tenants with formal lease agreement
	Selling Coffee, tea and other drinks (3 Cafeterias)	Abou Qir Station	Tenant with formal lease agreement.
		Al Zahiria Station	Tenant without any contractual agreements
		Sidi Beshr Station	Tenant without any contractual agreements
	Selling haberdashery (1 Kiosk)	Sidi Beshr Station	Tenant with formal lease agreement
	Selling newspapers (1 Kiosk)	El Souqh Station	Tenant with expired lease agreement

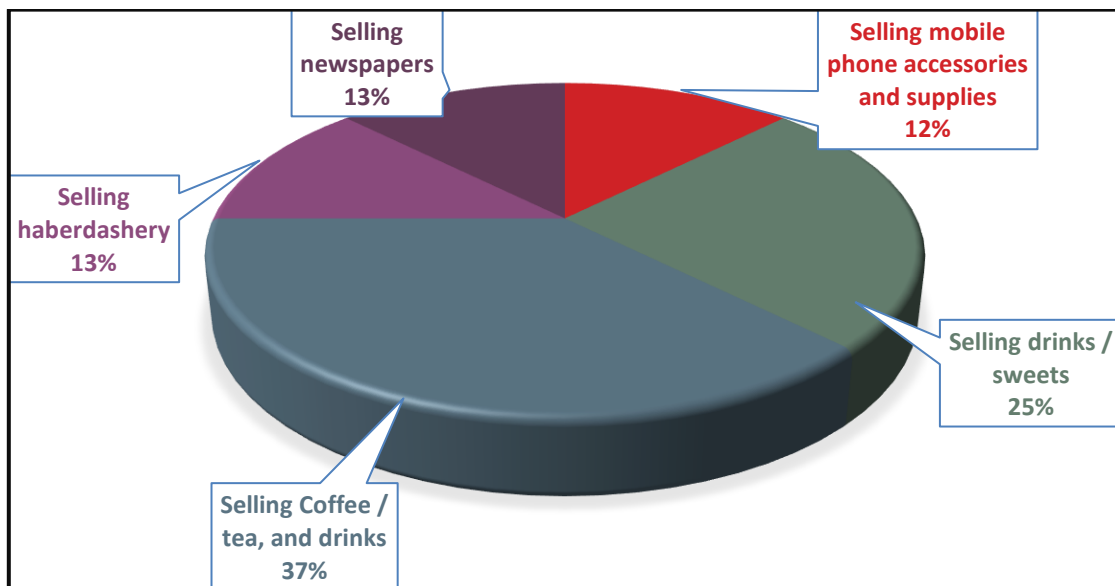


Figure 6-18 Distribution of shops within the existing stations according to business type.

The data of the previous table shows the legal status of shop tenants, i.e., those who have valid lease contracts/ agreements for shops (5 PAPs) or not valid/ expired lease agreement and is still paying the rent (1 PAP) and those who do not have contractual agreements (2 PAPs) and do not pay rent, which means that they are informal.

³⁸ Legal status is defined as tenants with valid lease agreement or not valid/ expired lease agreement and are still paying the rent, whereas illegal status refers to tenants without any contractual agreements established.

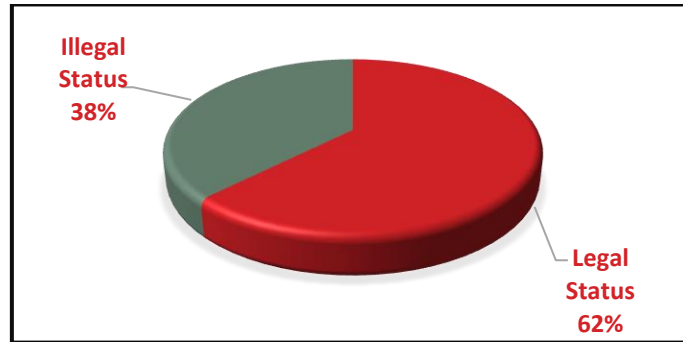


Figure 6-19 Legal status of shops within the existing stations.

All the shops in the existing stations are rented from ENR or from entities that are affiliated with ENR. However, according to the results of the socio-economic survey, not all tenants have valid contracts. The following figure shows the percentage of valid contracts from the tenants of the shops located in the existing stations. It is clear from the data presented in **Figure 6-20** that (50%) of the businesses owners have a formal lease agreement whilst (12%) of business owners hold an expired lease agreement with ENR and 38% of business owners do not have a contract/ agreement. Tenants with expired legal contracts with ENR who are still paying rent inside the stations and tenants with no contractual agreements in place are eligible for compensation as described in the Project entitlements matrix (see **Table 9-2**).

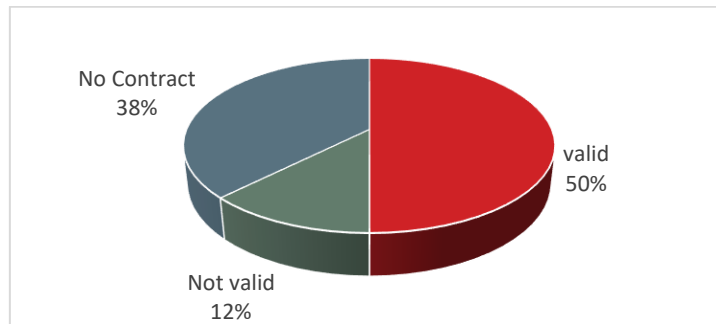


Figure 6-20 The percentage of valid contracts from shop tenants in existing stations.

6.3.4 Informal users within the Project alignment

The RAP team conducted a socio-economic survey of the stationary informal vendors and informal mobile vendors located in the Project alignment corridor. These were identified through the 2 rounds of walkthroughs of all the stations, the ENR inventory and the final inventory of the Compensation Committee. These informal vendors are officially recognised as PAPs and included in the census for the Project.

The results of the socio-economic survey conducted by the RAP team for informal users within the Project alignment are shown in **Table 6-6** below.

Table 6-6 Characteristics of Informal Users within the Project Alignment

PAPs	Total Number	Business Type	Location	Legal Status
	15	5 selling vegetables and fruits	El Souqh,	

PAPs	Total Number	Business Type	Location	Legal Status
Stationary Informal Vendors			Victoria and El Asafra Stations	12 Stationary Informal vendors with no rental agreement
		4 selling clothes	Victoria and El Asafra Stations	
		2 selling shoes and bags and Slippers	Victoria and El Asafra Stations	
		1 Selling drinks/ sweets	Between Maamoura and Tosan stations	
		3 selling flowers and plants	After Ghebrial Station and between Maamoura and Tosan stations	1 Stationary, tenant with formal lease agreement 2 Stationary Informal vendors with no rental agreement
Informal Mobile Vendors	6	1 selling vegetables and fruits	El Souqh Station	6 Informal mobile vendors with no rental agreement
		2 selling fish	El Souqh and Victoria Stations	
		1 selling houseware	Victoria Station	
		2 selling haberdashery	El Souqh Station and between Maamoura and Tosan stations	

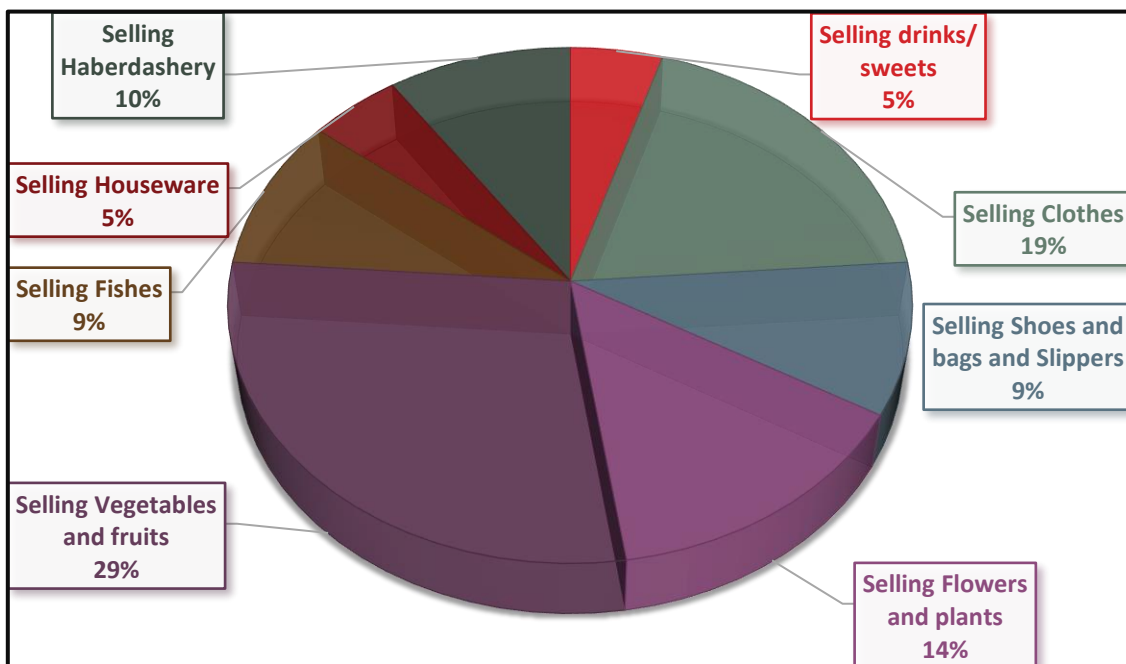


Figure 6-21 Distribution of Informal users within the Project alignment by business type.

Figure 6-21 shows the diversity of informal economic activities within the Project alignment. The largest proportion of informal vendors sell vegetables and fruits (29%) followed by sellers of clothes (19%). Informal vendors selling houseware and drinks represents the lowest percentage (at 5% each).

The area occupied by the informal economic activities varies within the Project alignment. The total area occupied by 14 informal users ranges from 3-6 m² each. The highest area occupied by informal users relates to flower and plant nurseries occupying an area of 15-30 m² each, with and the lowest area occupied not exceeding 2 m².

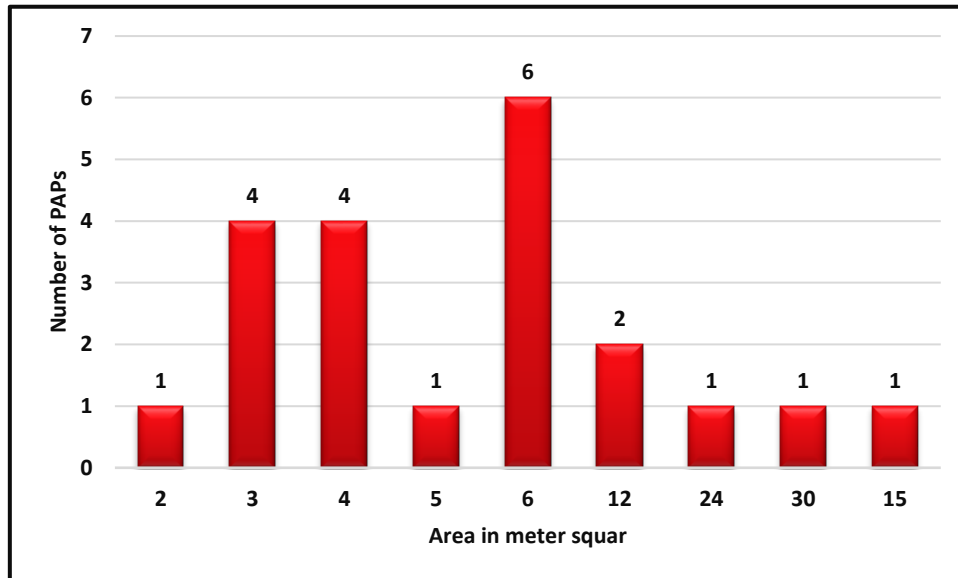


Figure 6-22 Area occupied by the informal users.

The results of the socio-economic survey show that all the informal users own their own tools and equipment (such as tables, mobile tables, kiosks) that they use for their economic activity. All of the informal users own their tools individually (under single ownership) except for 2 informal users only that have joint ownership.

6.3.5 Shops externally adjacent to the Project alignment corridor

As mentioned before, the socio-economic survey for shops outside the Project alignment corridor included a representative sample of the shops externally adjacent to the Project alignment. The sample was selected according to the most recent satellite data available (up to December 2021), in addition to, pedestrian routes in the areas where the presence of shops is concentrated.

The results of the socio-economic survey conducted by the RAP team for shops externally adjacent to the Project corridor are presented in **Table 6-7** below.

Table 6-7 Characteristics of Shops Adjacent to the Project Alignment

Business Type	Location						Total
	Victoria Station – Mohamed Naguib Station	Mohamed Naguib – Sidi Bishr Station	Sidi Bishr Station – Miami Station	Miami Station – Asafra Station	Asafra Station – El Mandara Station	El Mandara Station - El Montazah Station	
Mobile phone accessories and supplies	1	1	1	-	1	1	5
Haberdashery, drinks and sweets (kiosk)	-	1	1	2	-	-	4
Coffee, tea and other drinks	-	-	-	-	-	1	1
Clothes	8	8	-	2	-	2	20
Shoes and bags	1	-	-	-	1	1	3
Juice shop	-	-	-	1	-	-	1
Flowers and plants	1	-	-	-	1	-	2
Pet birds	1	1	-	-	-	-	2
TV transmitter dishes	-	1	-	-	1	-	2
Electronics sales and maintenance	2	1	-	1	1	-	5
Watch sale and repair	1	1	-	-	1	-	3
Oriental sweets	-	-	-	-	1	-	1
Paints	1	-	-	-	-	-	1
Gold and silver crafts	1	-	-	-	1	-	2
Frozen meat / butcher	1	-	-	-	-	1	2
Cosmetics	-	1	1	-	-	1	3
Furniture	-	1	-	-	-	-	1

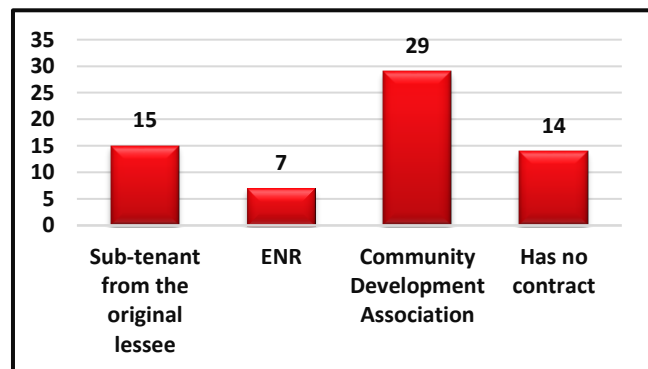
Business Type	Location						Total
	Victoria Station – Mohamed Naguib Station	Mohamed Naguib – Sidi Bishr Station	Sidi Bishr Station – Miami Station	Miami Station – Asafra Station	Asafra Station – El Mandara Station	El Mandara Station - El Montazah Station	
Bean grinder	-	1	-	-	-	-	1
Shoe repair	-	1	-	-	-	-	1
Sharpening knives	1	-	-	-	-	-	1
Barber	-	-	-	-	-	1	1
Electrician	-	1	-	-	-	-	1
Carpenter	-	1	-	-	-	-	1
Quran and prayer clothes	-	-	1	-	-	-	1
Total	19	20	4	6	8	8	65

The shops externally adjacent to the Project alignment corridor are situated within the vicinity of Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, Mandara and Montazah stations. These are the areas where the Project alignment will be elevated on the viaduct, and as such these shops may be impacted by Project construction activities given their proximity. Shops selling clothes, mobile phones and electrical appliances are among the most popular commercial activities identified, in addition to, many food shops. The areas in which the shops are located are mostly commercial areas, in addition to, to densely populated areas (Montazah Awal and Sharq Districts).

The results of the socio-economic survey showed that the largest percentage of the shops adjacent to the Project alignment are rented from an entity called "Community Development Association", with contracts renewed annually for the current tenants. **Table 6-8** shows the entity/ person with whom the tenant has a contract.

Table 6-8 Distribution of Tenancy Status

Entity/ Person	Number
Sub-Tenant from the original lease	15
ENR	7
Community Development Association	29
No contract	14
Total	65



According to the results of the socio-economic survey, the vast majority of tenants have legal status. 69% of the study sample (45 PAPs) have valid lease contracts/ agreements for shops or lease agreements that are not currently valid/ expired with 9% of these business owners (6 PAPs) still paying the rent. 22% of the study sample (14 PAPs) do not have contractual agreements; these are sub-tenants and pay rent but do not have any contractual agreement and as such are considered informal tenants. **Figure 6-23** shows the percentage of valid contract holders.

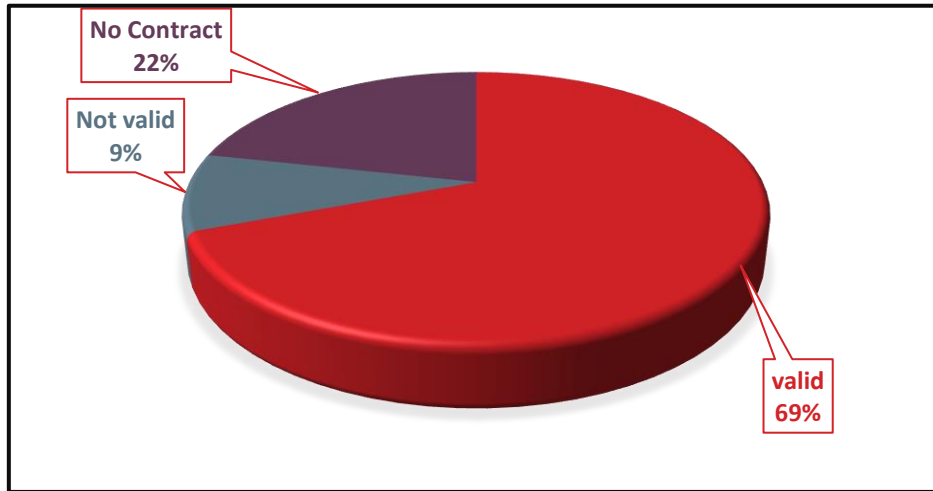


Figure 6-23 the percentage breakdown of tenant contracts / agreements status for shops externally adjacent to the Project alignment corridor

6.3.6 Households Externally Adjacent to the Project Alignment Corridor

As mentioned before, the socio-economic survey included a sample of the apartment buildings externally adjacent to the Project alignment corridor. According to the site visits conducted by SYSTRA during the preparation of the environmental and social impact assessment studies for the Project, some areas in the viaduct section were identified as apartment buildings close to the Project alignment, near to the following stations: Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra.

The RAP team selected a sample of areas between the previous stations with a focus on the areas closest to the Project alignment corridor, which are: Al Zahiria, El Souqh, Ghebrial and Victoria. The sample size was selected according to the results of the walkthroughs conducted by the RAP team, which showed that some apartment buildings located in the area from Al Zahiria Station to Victoria Station are close to the current railway alignment separated by a fence.

Some of the apartment buildings in these areas were observed by the RAP team during fieldwork to be in a dilapidated condition, especially in Al Zahiria. As a result, the RAP team intensified the socio-economic survey sample of households in this area. Where apartment buildings were observed during the Project walkthrough to be the closest to the Project alignment corridor, and as such could be impacted by Project construction activities. As previously mentioned, a geotechnical study is to be conducted by the EPC contractor to identify the condition of potentially affected residential buildings prior to construction.

The number of floors in these apartment buildings varies. Some buildings can reach up to 10 floors, whilst others do not exceed 3 floors. However, on average the majority of apartment buildings in these areas consist of 5 floors.

According to the previous description, the sample size was determined according to several factors, namely:

- The apartment building closest to the Project alignment corridor;
- Population density of the area near to the Project alignment;
- The structural condition³⁹ of the apartment buildings closest to the Project alignment corridor (the old, dilapidated buildings) because they are vulnerable to construction impacts; and
- Acceptance of residents to participate in the socio-economic survey.

Therefore, the sample size from the apartment buildings came as follows, with a total sample of 40 households (i.e., one apartment in each apartment building):

- From Al Zahiria Station to El Souqh Station (17 apartment buildings);
- From Ghebrial Station to Victoria Station (13 apartment buildings);
- From Mohamed Naguib Station to Sidi Bishr Station (5 apartment buildings); and
- From Miami Station to Asafra Station (5 apartment buildings).

Figure 6-24 shows the distribution of the household sample over the areas externally adjacent to the Project alignment corridor.

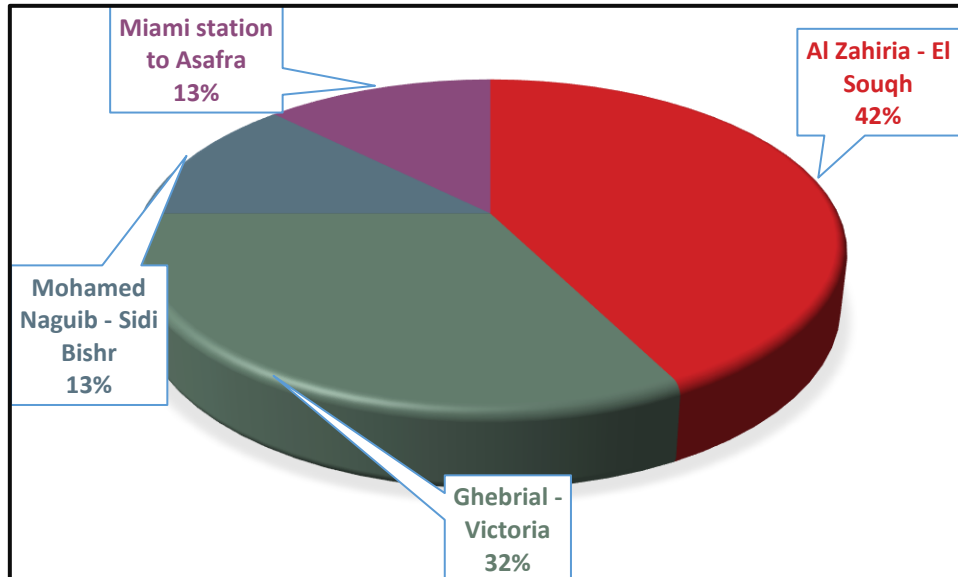


Figure 6-24 distribution of the household sample along the Project alignment

The results of the socio-economic survey showed that the majority of the respondents in the survey sample are property owners (70%), with the remaining respondents being tenants (30%).

³⁹ These apartment buildings were selected within the study sample according to field observations as well as the discussions with residents during conducting of the socio-economic survey, this selection was not made according to any reports or documents from SYSTRA or the Governorate.

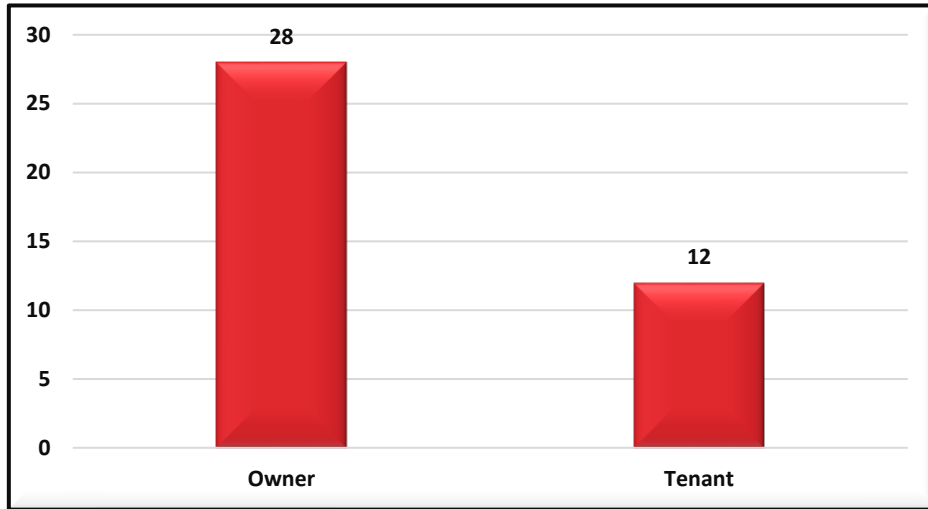


Figure 6-25 Distribution of the survey sample according to property ownership

Further socio-economic baseline information that includes demographic profile, employment and income characteristics, in addition to, public infrastructure and services are presented in **Appendix 3**.

6.4 Vulnerable Groups

Table 6-9 provides a list of vulnerable groups that indicate illiterate PAPs have the highest percentage among all the vulnerable groups with a percentage of 10.4% from the total sample. This is followed by the elderly at 9%, the disabled and PAPs that are considered the sole breadwinner within their household at 5.2% each. In addition, 2% of PAPs (3 women) are categorised as women breadwinners' woman). 32% of the total sample are considered to be vulnerable.

Table 6-9 Vulnerable Groups that are likely to be Affected

Vulnerable Groups	Tenants of shops located in stations	Informal users within the Project alignment	Shops outside and adjacent to the Project alignment corridor	Households outside and near to the Project alignment corridor	Total
PAPs with physical disabilities	-	1	1	5	7
Woman breadwinners	1	-	2	-	3
Elderly	1	2	5	4	12
illiterate	-	4	3	7	14
Economic (sole bread winner)	2	3	2	-	7
Total	4	10	13	16	43

Using the background information provided in **Table 6-9** above, a vulnerability analysis has been undertaken to identify more context specific groups of vulnerable people affected by the Project. These specific vulnerable groups are described below.

- **PAPs with physical disabilities** – PAPs are identified with physical disabilities (7), the nature of which was not disclosed. These PAPs who may need to relocate may find the move difficult or may become increasingly vulnerable to Project impacts in terms of their health due to their sensitive physical and wellbeing status.
- **Women breadwinners** – who are the heads of their household, they are the breadwinners in their families, whose income represents the only or largest source of family income, and her losses or influence on this income represent an impact on all family members. They do not have social insurance and are classified as "poor"⁴⁰.
- **Location-dependent elderly persons** – Who depend on shops/ informal economic activity located inside the railway corridor that will be expropriated, their health may be negatively affected by their resettlement.
- **Illiterate PAPs** – The link between illiteracy and social disadvantage and exclusion is well established. Illiterate people may be disadvantaged in their life chances, social and political participation, mental health and personal relationships. Support will be provided to such PAPs, if required, through the RAP.
- **Sole breadwinner** – An affected person whose income being the only source or largest source of income for a particular household. They do not have social insurance and are classified as "poor".

6.5 Social Aid and Government Support

According to the results of the socio-economic survey, none of the PAPs receive social aid or subsidies from government agencies or NGOs. Some referred only to some financial and in-kind aid (clothes, medicine, food) provided by relatives, which is provided on an irregular basis every two or three months and during seasons and holidays (Ramadan, Eid al-Fitr, Abd al-Adha).

6.6 Perceptions on the Project

Table 6-10 shows the PAP perceptions on the Project, through which it is clear, that in general the perceptions are positive. None of the PAPs expressed their objection or rejection of the Project, but some of them had some concerns/ questions related to the Project's potential impacts.

⁴⁰ According to the Central Agency for Public Mobilization and Statistics CAPMAS, the average poverty line is 736 EGP per person per month, a family consisting of two adults needs 1,667 EGP per month to meet its basic needs, a family consisting of two adults and two children 2,691 EGP per month. The poverty line was built for each family according to its age and gender structure and its place of residence (Poverty Indicators, Income, Expenditure and Consumption Research, CAPMAS, 2017-2018).

According to the report cited as reference; The average poverty line per capita in the fiscal year 2017/2018 in urban areas (Northern District) amounted to 8,827 pounds annually, or 736 pounds per month.

The poverty line is the lowest level of income that a person or family needs in order to be able to provide an adequate standard of living.

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Table 6-10 PAPs Perceptions on the Project

PAPs Perceptions	landowners ⁴¹	Tenants of shops located in stations	Informal users within the Project alignment	Shops externally adjacent to the Project alignment	Households externally adjacent to the Project alignment
The Project is good	30	6	16	48	35
The Project is bad	2	2	5	17	5

Public perception of the Project (both positive and negative) has been expressed as follows during the survey:

- **The Project is good**

Positive feedback for the Project shared as part of the socio-economic survey, in addition to, the meetings held with both landowners and residents externally adjacent to the Project alignment is summarised below.

- Time saving for the Abou Qir railway trip, the metro will be faster than the railway;
- Fast transportation;
- Reduce congestion;
- Safety for people / reduce accidents;
- It will clean up the existing railway corridor; and
- It will open new crossings between the two ends of the city and increase accessibility.

- **The Project is bad**

Concerns related to land acquisition procedures and potential impacts on livelihoods were at the forefront of negative perceptions of the Project include:

- People might be affected in terms of livelihoods due to expropriation of their shops;
- Reduce commercial activities; and
- Unfair validation of land prices by the ASD.

In addition to the above, the RAP Team conducted a media search to further inform the public perception on the Project.

Media Sources

The sources reviewed range from national and online newspapers, as well as social media with a primary focus on Facebook. Overall, approximately 55 media sources were assessed over a three-month period to identify public perceptions of the Project, as well as the ongoing developments being

⁴¹ Number (32) is not the total number of landowners, but the number of landlords and their representatives who were part of the consultation. As previously mentioned, the RAP team has not yet received the formal list of landowners provide by the ESA/ASD via NAT.

reported on and media trends. Notable publications include Gomhouria Online, Al Ahram, Al Mal News, Masr Al Youm, Shoruk News among others. On social media, Facebook pages related to Alexandria matters were targeted to be included in the media search.

Main Findings

- The potential positive impacts of the Project were promoted to cover advantages that will be realised including reduced journey times, increase passenger capacity.
- In addition, State heads and ministerial representatives emphasised the importance of the Project in alleviating traffic, promoting the enhancement of national infrastructure and developing the transport sector in Egypt.
- Articles published related to meetings with relevant ministries and national stakeholders have all highlighted the importance of the Project, and its alignment with national efforts to enhance transportation in the country. The reports also indicated State representatives strongly endorsing the Project and its quick implementation.
- The Project was referenced as part of a wider Ministry of Transport plan to promote clean energy and sustainable transport on a national scale.
- In media sources covering national projects seeking to promote national and sustainable development, the Project was listed as a key investment that will benefit its citizens alongside other transport projects in other governorates.
- There were less than five reports relating to shop owners, land and mosques along the Project alignment and what the next steps would entail. It was reported that shop contracts would not be renewed once expired. Additionally, it was also reported that one mosque, the Nour Al-Salam Mosque, was in the process of being removed. In relation to land, it was reported that alternatives are being explored for tenants and that a budget has been allocated for NAT to pay owners whose land is being expropriated.
- On social media, posts indicating a January-February implementation period would be imminent, commenters indicated they were eager to see the project succeed, and that they do not want the Project to be delayed further. Some commenters expressed their scepticism that the original implementation date would be accurate. Additionally, commenters also expressed their frustration regarding the implementation delay that was reported.
- Regarding the delay in implementation, one source reported that it was due to an implementing body not having been chosen yet. On social media, the delay was linked to school examinations, and ensuring students are comfortably able to rely on transport to and from educational facilities.
- On Facebook, where posts gathered engagement from users, there were no negative concerns or complaints related to the Project itself expressed. However, commenters were emphasizing their frustration at the continued delays in implementing the Project. Moreover, some commenters were curious and asking when the Project implementation would commence.
- During the second half of January, media attention began to shift towards alternative transport during the implementation of the Project, with numerous outlets reporting that multiple companies are seeking to be providing bus replacement services. On social media, it was also

reported that trials had begun to assess the quality of alternatives prior to the suspension of the train.

- Coverage related to ticket prices was limited, with one news outlet reporting that the ticket price would be EGP 3. However, this may be the starting price for passengers seeking to use the metro for part of the station network.
- Challenges associated with the Manadara Tunnel have been reported on twice, in which it was also reported the tunnel would be filled to accommodate citizens.

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7. PROJECT IMPACTS

This Chapter describes Project impacts related to land acquisition, resettlement, livelihoods and accessibility during the construction phase. These impacts were identified as relevant to the Project based on the socio-economic survey, FGDs (including FGDs with women only and from residents of areas close to Project alignment) and various consultation meetings with State authorities and NGOs conducted by the RAP team with all the groups affected by the Project as well as the groups likely to be affected by the construction activities. A summary of the key consultation points raised during the FGDs and the consultation meetings with State authorities and NGOs are summarised in **Chapter 10: Information Disclosure and Consultations**.

7.1 Project Affected People

Impacts due to land acquisition and involuntary resettlement vary depending on the nature of Project activities and its land needs, the economic activities of the PAPs, and the type of land ownership and its use. Unavoidable impacts potentially resulting from expropriation and resettlement activities include loss of land, if land is owned by individuals (private property) rather than publicly owned land, impact on livelihoods as a result of changes in land use and access restrictions or loss of different types of assets.

Table 7-1 includes the PAPs identified by each affected group.

Table 7-1 Project Affected People

Project Affected People		Number of PAPs	
		PAP	No. of family members
Owners of private lands⁴²			
The depot land	Al Nahas Company ⁴³	1 Company	-
	Heirs of the Gawish family	184 persons	433
	Heirs of the Behairi family	12 persons	42
Bab Sharq Station land parcel		6 persons	18

⁴² The numbers in this table for the affected landowners are according to the results of the socio-economic survey conducted by the RAP team with representatives of the landowners, not according to the owners' lists issued by the ASD, these lists have not yet been issued.

⁴³ El Nahas Company is affiliated to the Ministry of Business Sector.

Project Affected People	Number of PAPS	
	PAP	No. of family members
Sporting Station land parcel	4 persons	14
Tenants of shops located in stations	8 Tenants	38
Informal users within the Project alignment⁴⁴		
Stationary informal vendors	15 persons	76
Informal mobile vendors	6 persons	32
Potentially Affected PAPS⁴⁵		
The Shops externally adjacent to the Project alignment	At this point, potential impacts have been considered in the RAP, however NAT has confirmed that no impacts are foreseen. Refer to Section 5.3.4 for further details.	
Households externally adjacent to the Project alignment		

7.2 Project Affected Businesses

7.2.1 Tenants of shops, kiosks and cafeterias located in stations

ENR rents the shops through the MOT Company for Investment and Development, which is responsible for the investment sector of the MOT as well as ENR.

The inventory of kiosks and shops undertaken for the RAP within the ENR stations identifies 4 kiosks, 1 shop and 3 cafeterias.

Table 7-2 Affected Shops, Kiosks and Cafeterias Located in Stations

Business Type	Location	Total Number
Kiosks selling drinks, sweets, newspapers and haberdashery	El Souqh, Sidi Beshr, Sidi Gaber and Abou Qir Stations	4
Cafeterias selling coffee, tea and drinks	Al Zahiria, Sidi Beshr and Abou Qir Stations	3

⁴⁴ The number of informal users presented represents a complete census of all attendees in this PAP category based on a number of field visits conducted by the RAP team and walking through the Project alignment corridor.

⁴⁵ The design of the Project, as well as the Project's needs for the land parcels that have been identified so far, do not require the removal of any houses or shops externally adjacent to the Project alignment. However, residents of apartment buildings and tenants of shops have been added to the affected group given the possibility that they may be impacted by construction activities at a later stage.

Business Type	Location	Total Number
Shop selling mobile accessories and supplies	Victoria Station	1
TOTAL		8

7.2.2 Shops Externally Adjacent of the Project alignment

It has been confirmed by NAT that shops externally adjacent to the Project alignment will not be impacted by the Project’s land requirements. However, construction activities may result in restricting access to and from these businesses as well as potential risks around damages to structures. No design change is expected in terms of physical displacement. In the event of any of the three risks above occurring, NAT will work with the consultant (SYSTRA) to: (i) provide alternative routes for access or replacement transportation services; (ii) compensate for damages to shops; and (iii) change the design in order to avoid shops being physically impacted. In addition, the Egyptian Civil Code 131 Articles 168 and 171 (as summarised in **Table 3-1** in **Chapter 3 Legislative Framework**) allow property owners to raise claims with the EPC Contractor against any damage or disturbance should it occur during construction. Buffer zones or safety zones will be defined during the construction of the Project as described in **Chapter 2 Project Description Section 2.2** of this RAP.

The shops externally adjacent to the Project alignment are located in the following station areas: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and El Montazah. These are the areas in which the Project alignment will be elevated (i.e. the viaduct area).

The RAP Team surveyed a sample of 20% of the total maximum number of shops in each location in May 2022, so that a total sample of 65 shops distributed over the different locations were surveyed. The potential impacts of the Project on the shops externally adjacent to the Project alignment are included in **Section 9-1 Entitlement Matrix**.

7.3 Impacts on Land use and Livelihoods

Table 7-3 summarizes the current uses of the land parcels (public/private) that will be acquired for the Project (permanent/temporary), as well as the estimated areas of these lands according to the Project's needs.

Table 7-3 Private Land Use and Area

Land	Use	Area
Permanent impact on private land use		
Kafr Abdou Station and depot land	The Kafr Abdo Station and the depot will be built on the Copper factory land (El Nahas), which is currently owned by the Ministry of the Public Business Sector, and a ministerial decision of land acquisition was already issued in this regard. The Copper factory land	204,436 m ²

Land	Use	Area
	is mostly empty with a number of decommissioned factories that have not been in operation in the last few decades.	
Bab Sharq Station land parcel (privately-owned land)	The land of Bab Sharq is used as an open-air car parking area. In addition, there is a car wash in the corner, which was observed during the RAP team's visit to the land parcel during April 2022. There are no plants or trees planted on the land, but there is a security guard room with water, sewage and electricity facilities.	632 m ²
Sporting Station land parcel	The land parcel at the proposed Sporting Station is used as an open-air area to park cars belonging to the landowners. Part of the land is also used to store some building materials owned by the landowners.	887 m ²
Permanent impact on public land use		
ENR property of the Abu Qir railway line	ENR owns the 21.7 Km railway corridor and all the facilities located within. Coordination between ENR and NAT is however ongoing to transfer the ownership of the alignment according to the Prime Minister Decree No. 2360 of 2020, which considers the Abu Qir railway line with all its installations and facilities as a Public Interest Project.	-
13 Mosques built on ENR property	<p>The Abou Qir train corridor currently includes (13) Mosques that were built on land owned by ENR inside the train corridor. Mosques will be removed for the construction of the Project, in coordination between NAT and ENR to transfer the ownership of the mosques' land that is included in the Abou Qir railway corridor land. Coordination was made between NAT and the Ministry of Endowments to take the necessary measures to create alternatives to the mosques that will be removed. According to the meeting held by the RAP team with the officials from Alexandria Endowments Directorate, some mosques are currently being rehabilitated and expanded in the areas adjacent to the project alignment, and residents in these areas rely on the existing mosques, as each area has at least 20 mosques open for prayer.</p> <p>The employees in the mosques are affiliated with the Alexandria Endowments Directorate. In each mosque, there is one or two employees, depending on the size of the mosque and its activities. These employees have been assigned to work in other mosques and receive their salaries on a regular basis without any impact on their livelihood as a result of the mosques being removed as a result of the Project.</p> <p>The Directorate of Endowments of Alexandria reports that the number of volunteers to serve the mosque and the worshippers is estimated at no more than two in each mosque. The volunteers attend the mosque periodically during the day to open the mosque during prayer times (five times a day). Cleaning of the mosques was undertaken by a cleaning company that was paid from the donation fund in each mosque.</p>	Included in the ENR corridor property area

Land	Use	Area
	In addition, the Directorate of Endowments in Alexandria confirmed that two NGOs were renting space in buildings adjoining the mosques to perform community service activities. This included Quran memorization, a nursery and an educational centre, however these activities ended with the beginning of the COVID-19 pandemic and did not resume.	
ENR warehouse	The construction of Bab Sharq station will require an additional piece of land from the railway property, which is currently used as a warehouse. Coordination is made between NAT and ENR to transfer the ownership of the land for the Alexandria Metro Project in accordance with Prime Minister Decree No. 2360 of 2020 (Appendix 2a: Land acquisition ministerial decision).	869 m ²
Part of public parking area	The construction of Bab Sharq station will require an additional plot of land owned by the Alexandria Governorate, which is a state-owned entity, and is currently used as a public parking area. The ownership of the land will be transferred to NAT for the construction of the Alexandria metro project in accordance with Prime Minister Decree No. 2360 of 2020 (Appendix 2a: Land acquisition ministerial decision).	380 m ²
The administrative building	The construction of the sporting station will require an additional plot of land that is currently used as an administrative building owned by the Alexandria Health Directorate, state-owned land. The ownership of the administrative building land will be transferred to NAT for the construction of the Project in accordance with Prime Minister Decree No. 2360 of 2020 (Appendix 2a: Land acquisition ministerial decision).	852 m ²
Temporary impact on private land use		
Not determined yet	At the moment, no private lands have been identified that will be temporarily used during construction. NAT has confirmed that there will be no temporary land acquisition of the project during construction, and the available areas within the ENR property will be relied upon (for more details see Section 6.3.3)	-

7.3.1 Permanent Impact on Land Use

The Project alignment corridor which is 21.7 km and all the facilities located within is publicly owned by ENR. Coordination between ENR and NAT is however ongoing for the transfer of ownership of the alignment based on the Prime Minister Decision No. 2360 of 2020, which considers the Project to be of public interest. The decision also includes the right of acquisition of any real estate or land needed for the Project (**Appendix 2a, 2b: Land Acquisition Ministerial Decree**).

The establishment of the Project includes permanent land acquisition of three privately owned land parcels, which are:

- Kafr Abdou Station and depot land;
- Bab Sharq Station land; and
- Sporting Station land.

Table 7-3 above includes a description of the current use of these lands according to the site visits that were carried out during conducting the socio-economic survey (April-May 2022).

7.3.2 Permanent Impact on Livelihood

It was observed by the RAP team during the socio-economic survey (April-May 2022) that some informal economic activities were present within the Project alignment corridor. These are classified as:

- Stationary Informal Vendors; and
- Informal Mobile Vendors.

These informal vendors within the Project alignment corridor are concentrated in the areas located near El Asafra, Sidi Bishr, Victoria, Ghebrial, Souq, Maamoura and Tosan stations. The economic activities of these users are shown in **Table 6-6**.

7.3.3 Temporary Impact on Private Land Use

As a priority, the Contractor will attempt to avoid any land acquisition by utilising available ENR land at the existing stations as much as possible for the storage of equipment and building materials during construction.

NAT confirmed that there will be no temporary land acquisition for the Project during construction, and the available areas within ENR property will be relied upon. Labour camps will be limited to providing services available to workers at construction sites during daytime. No accommodation will be provided for workers at the construction sites. Local workers from Alexandria Governorate will be relied upon as much as possible.

The construction Contractor is expected to rent accommodation apartments for workers from outside Alexandria or rent apartments as offices adjacent to the Project site. This will be ensured through a contractual agreement that will be signed under the terms agreed with the landowner of the property and the Contractor. NAT will ensure that such agreements are legally binding and drawn up correctly to reflect terms and conditions that align with Lender requirements. The PMU will be responsible for following up on the implementation of any compensation requirements that are carried out in accordance with what is stated in the RAP.

In the event that this cannot be avoided, the Contractor may need to rent a plot of land for this purpose. This will be carried out via voluntary lease agreements (with specified duration) between the Contractor and the landowner, which can be renewed if required.

NAT will include in the environmental, social, health and safety (ESHS) land acquisition Technical Specifications/ Requirements Section in the EPC Contract Works that: “temporary land acquisition outside ENR land during construction will be allowed only as commercial transaction (lease or rental) – no expropriation will be implemented for temporary land acquisition”. In the event that temporary land acquisition restricts access to residents and commercial buildings, the Contractor is obliged to

provide alternative access routes that are suitable for residents, especially vulnerable groups (location-dependent elderly, children, women and disabled people).

7.4 Impacts on Other Assets

7.4.1 Mosques across the Project Alignment

The removal of some infrastructure within the alignment is unavoidable. The only major structures that will be removed are the mosques, primarily for the construction of the new metro stations (or construction of new sections to existing stations to accommodate increased metro traffic). A total of 13 mosques will be removed for the Project.

The feasibility phase of the Project included a study to clarify the existing status of the mosques and articulate why the mosques need to be removed. The impact of each mosque on the viaduct was shown through drawings and figures. It was finally concluded that 13 mosques required removal.

In Egypt, all privately or publicly built places of worship belong to the Ministry of Endowment. All the mosques are built without a permit on lands that were not in use by ENR. The ENR filed numerous trespassing cases regarding their ownership of the land being used by the mosques. All the mosques initially began as small prayer rooms, but eventually expanded to mosques via community members and residents gathering donations to expand these mosques. This process occurred over numerous years following the revolution, and underwent different stages, as reported to the consultant (SYSTRA) by the relevant imams. In recent years, all mosques regardless of size are affiliated with the Ministry of Endowment. The Ministry of Endowment is the responsible authority in charge of mosques and thus compensation related to mosques have been agreed with the ministry and the decision for establishment of alternative mosques will be decided in consultation with the community.

The MOT has coordinated with the Ministry of Endowment for the removal of the affected mosques in exchange for a compensation value of 25,000,000 EGP (Refer to **Appendix 4**), allocated for the construction of other alternative or the expansion of an existing mosque, in order to reduce potential grievances from the local community that could arise from removing these mosques.

7.4.2 Government Assets included in Bab Sharq and Sporting Stations

Bab Sharq Station: The construction of the Bab Sharq Station will require additional land from one land parcel (869 m² owned by ENR currently used as a warehouse).

Sporting Station: The construction of the Sporting Station will require additional land (approximately 852 m²) occupied by an administrative building owned by the Health Directorate in Alexandria, which is a publicly owned entity.

7.4.3 Households Externally Adjacent to the Project Alignment

Some sections of the Project alignment are close to houses and may be affected by construction activities, in particular houses that are located within the elevated (the viaduct) section. The construction work includes excavation which may affect nearby buildings depending on their construction condition.

The design of the Project, as well as the Project's needs for the land parcels that have been identified, do not require the removal of any houses or residential buildings. However, the residential buildings

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have been added to the entitlements matrix due to the possibility that houses adjacent to the Project will be affected by excavation activities in the viaduct section which are: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr.

7.4.4 Permanent Loss of Trees

The construction of the project will result in the removal of some trees (about 5 palm trees) on the depot land. The results of the site visits conducted by the RAP team during the socio-economic survey showed the presence of a number of non-fruitful palm trees (during the time of the visit, April 2022, it did not bear fruit at the time). The trees will be counted by the ASD and the compensation will be determined for the owners of trees which might also be the owners of land according to the price list of the Alexandria Agriculture Directorate prior to land entry.

7.5 Impacts on Vulnerable Groups

The identification of the vulnerable groups, considering their interest and setting plans to mitigate for any negative impacts on them, lies within the core of the social impact assessment. This mainly returns to the fact that vulnerable groups are more exposed to the implications of various Project impacts.

By definition, the vulnerable population are those groups of people who are typically excluded, disadvantaged or marginalized based on their economic, ethnic, social or cultural characteristics. Various groups could fit within this category; therefore, a more specific definition of vulnerable groups likely to be negatively or positively affected by the Project is needed.

Section 6.4 Vulnerable Groups provides specific information on the types of vulnerable groups within the Project, including an assessment of each vulnerable group identified.

7.5.1 Vulnerable Groups Related to Impacts on Livelihoods as a Result of Land Acquisition

The Project has the potential to result in some unfavourable economic impacts during the construction and operational phases. The potential loss of income may arise during construction due to areas being closed either temporarily during construction or permanently due to relocation of some businesses within commercial areas. Economically displaced vulnerable groups include:

- The leased shops/ kiosks located inside the existing stations (currently ENR property);
- The informal users of the right of way (informal mobile vendors) who carry out economic activities inside the Project alignment corridor; given their illegal status, they and their families are likely to be affected economically and socially, especially in the absence of another source of income;
- In the event of removing the shops adjacent and outside the Project alignment, business owners and employees in these shops with no insurance coverage and no healthcare are likely to be affected. This group consisting of business owners and employees may be asked to evacuate their shops during the construction in case of any potential risk or impact. According to national law, they will not be entitled to compensation as well as they are not legally eligible for healthcare or insurance, specifically location-dependent elderly and female workers.

7.5.2 Vulnerable Groups in Residential Areas Externally Adjacent to the Project Alignment

Construction activities at level crossings will lead to complete or partial closure of the crossings to pedestrians and vehicles, causing increased traffic congestion. This will reduce accessibility of the local community to various facilities around the construction sites. Vulnerable groups most likely to be affected by this are the persons with disabilities, location-dependent elderly and children.

Table 6-9 includes identification of vulnerable groups related to the Project according to the results of the socio-economic survey conducted by the RAP team.

7.6 Gender

Impact of land acquisition and livelihoods on gender was considered as part of the RAP, whether in the design of socio-economic survey tools or FGDs that were undertaken with women in residential areas adjacent and outside the Project alignment.

The tenants of shops located in the stations include one female user out of a total of 8, whereas there are no women among the informal users within the Project alignment identified socio-economic survey. 5 of the shops external adjacent to the Project alignment corridor are run by female PAPs. Women and men are equally eligible and considered under national law for receiving compensation.

The results of the socio-economic survey on the household sample did not specify any potential impacts of the Project on women, as the sample response in this regard was (0) out of 40 questionnaires.

Regarding women's feeling of safety when roaming the area and using public transportation, most of them do not feel safe while using the current means of transportation their response was 23 women feel unsafe using public transport and 16 felt safe; this indicates that the currently available means of transportation does not achieve safety and protection for women. In addition, one of the women's expectations from the Project is to provide safe and clean transportation.

25% of the household sample identified women's exposure to gender-based violence and harassment (GBVH) as a major current issue in the Project affected areas. However, no concerns were raised in the women-only FGDs regarding the expectation of GBVH from the labour influx of the Project. In addition, NAT officials confirmed during the meetings held with them that all considerations for the health, safety and security of the local communities surrounding the Project alignment have been considered within the Project design and community health and safety aspects integrated into the Project design.

8. INSTITUTIONAL ARRANGEMENTS

The planning, preparation and implementation of this RAP involves distinct processes and different responsible parties. This Chapter details the organisations involved, as well as their roles and responsibilities to ensure that PAPs and affected communities are resettled and compensated for any losses, so that their livelihoods and standards of living are restored to at least pre-Project levels.

8.1 Organisational Structure

NAT is responsible for the design and development of the Project. NAT is a Government Agency under the jurisdiction of Ministry of Transport, which was incorporated in 1983, for developing metro lines and railway electric traction transport projects inside and outside Egypt. NAT will have ultimate responsibility for the Project and will oversee the implementation of the Lender’s requirements during the Project’s design, construction and operation. NAT will establish a Project Management Unit (PMU) to co-ordinate and implement the Project, as described in the ESIA, that will be responsible for overseeing the implementation of this RAP. The RAP will be one of the key documents of the ESIA that will also be adhered to and implemented by the External Social and Resettlement Specialist who is a PMU team member. Refer to **Section 8.3** below for further details. NAT is the sole responsible agency before Lenders responsible for delivery of a compliant RAP implementation.

NAT’s organisational structure for the Project is shown in **Figure 8-1**.



Figure 8-1: NAT's organisational structure.

*The Compensation Committee comprises representatives of NAT Department of Legal Affairs, ENR Property Department and Ministry of Finance General Authority for Governmental Services. Where found necessary the Committee is like to call upon the speciality of experts from the Alexandria Governorate Department of Real Estate and Taxes.

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8.2 Coordination Arrangements

Figure 8-2 provides an organogram of the resettlement process, and the interface between the different organisations involved in the process:

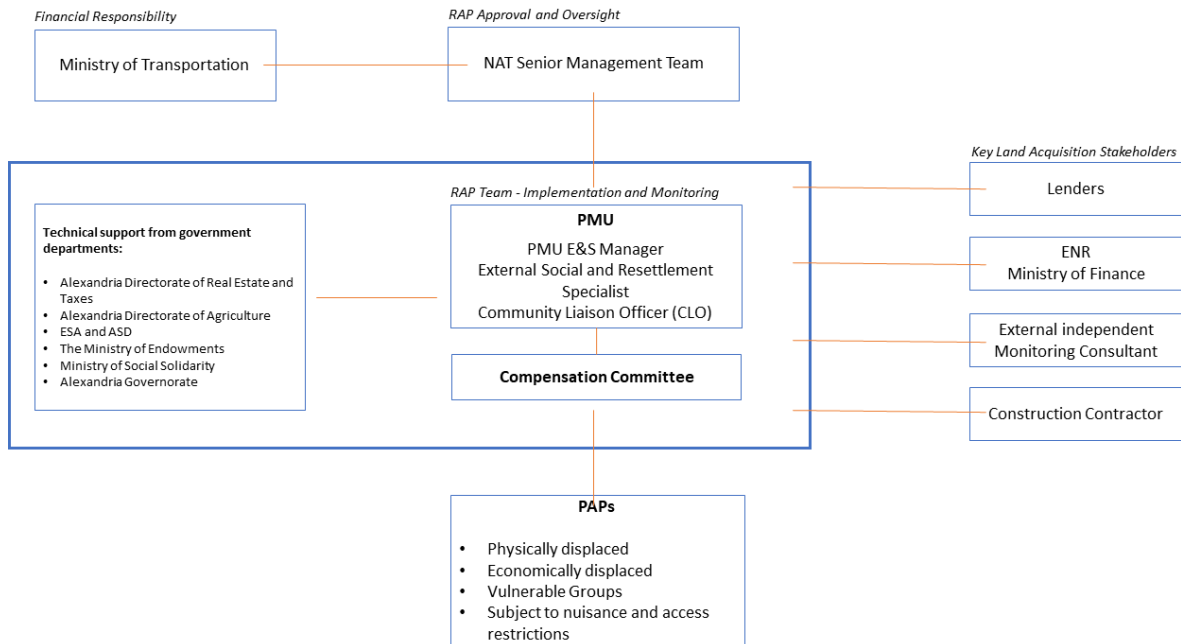


Figure 8-2: Resettlement organisational structure.

PAPs will be fully engaged and consulted with as part of the resettlement and livelihood restoration process. This consultation strategy for land acquisition for the Project is described in **Section 10.3** below.

8.3 Roles and Responsibilities for Land Acquisition

NAT’s senior management team and the Environmental and Social (E&S) PMU Manager will have ultimate responsibility for the effective implementation of this RAP. **Table 8-1** depicts the organisations involved in resettlement and compensation for the Project and describes specific roles and responsibilities.

Table 8-1: Compensation Costs for Land (where in-kind replacement is not feasible)

Entity	Roles and Responsibilities
Financial Responsibility	
Ministry of Transport (MOT)	The MOT is the entity requesting expropriation for public interest and concerned with land acquisition. The ministry: <ul style="list-style-type: none"> Requests the land acquisition for public interest as described in Section 7.1.2 Acquisition of Private Lands; and

Entity	Roles and Responsibilities
	<ul style="list-style-type: none"> Approves the deposit of the compensation full value according to the estimates of the ASD through NAT, on the grounds that it is the authority responsible for the Project under the MOT.
<i>RAP Approval and Oversight</i>	
NAT Senior Management	<p>NAT Senior Management will review and approve reports and documents associated with Project implementation. They are responsible for establishing the PMU and appointing technical specialists to effectively oversee and monitor the RAP implementation. They ensure that all relevant activities are executed in line with relevant national legislation and Lender’s requirements. With specific regards to this RAP, NAT Senior Management:</p> <ul style="list-style-type: none"> Approves the RAP (after Lender’s approval); Establishes a PMU to implement the Project RAP; Ensures availability of sufficient budget for resettlement, compensation and other livelihood restoration assistance and support through both national legislation and the RAP Fund (refer to Section 9.6: Compensation Application and Negotiation Process for a description of the funding sources adopted for this Project); Provides and disperses funds for mandatory and supplementary compensation - such as in cases of income loss, livelihood stabilization and support for socially vulnerable people, according to the valuation of the Compensation Committee; Provides an inventory of the affected shops and determine their legal / contractual status through the ENR and MOT Company for Investment and Development; and Announces the Project description and the place and duration of disclosure of the evaluation results in the Official Gazette, and two daily newspapers for a period of one week (including disclosure of the names of landowners and assets entitled to compensation).
<i>RAP Team – Implementation and Monitoring</i>	
PMU	<p>The PMU led by the PMU E&S Manager is responsible for the overall RAP implementation to ensure any potential impacts from the Project area are addressed in compliance with Egyptian legislation and the Lender’s requirements. The PMU:</p> <ul style="list-style-type: none"> Ensures land acquisition and resettlement activities (including economic displacement) comply with Lender’s requirements and this approved and disclosed RAP; Ensures engagement of other technical specialists to assist in implementation of the RAP, including valuation, monitoring and evaluation activities; Ensures coordination and liaison across NAT departments, relevant ministries and governorate departments involved in implementation of all RAP activities; Proposes and take appropriate corrective actions as needed during the RAP implementation; Maintains records and documentation of the compensation process; Provides financing and assistance to vulnerable groups in cooperation with the Ministry of Social Solidarity and the active NGOs in Alexandria Governorate; Supports and maintains close coordination with Alexandria Governorate in the implementation of the RAP; Supports the PMU Manager in high level decision-making, if required; and Oversees functionality and performance of the grievance redress mechanism for the Project supported by Project CLO, Compensation Committee, PMU E&S

Entity	Roles and Responsibilities
	<p>Manager and External Social and Resettlement Specialist⁴⁶ who will be actively involved in receiving and addressing grievances. The CLO within the PMU will also conduct regular inspections of records relating to grievances received and their resolution.</p>
PMU E&S Manager	<p>The PMU E&S Manager is ultimately responsible for RAP matters including expropriation, compensation to non-title holders, livelihood restoration etc. They are supported by experts within the PMU, and other departments, as required. The PMU Manager is responsible for:</p> <ul style="list-style-type: none"> • Notification and follow up (if required) with PAPs on upcoming land/property acquisition; • Preparing documents for the negotiation of compensation with PAPs, including additional compensation/allowances in accordance with Lender’s requirements, formalising agreements with PAPs, processing of timely and correct compensation payments to meet national and Lender’s requirements to PAPs and following up with registration of land / property titles; • Representing NAT during any expropriation court cases, when necessary; • Assisting in receiving, recording, resolving and reporting of grievances related to land / property acquisition process related to the Project; and • Guiding, and where necessary, supporting resolution of complex grievances.
External Social and Resettlement Specialist	<p>The PMU External Social and Resettlement Specialist is responsible for the overall implementation of the ESIA, its supplementary documents, the RAP, livelihood restoration plan, in addition to, Lender’s requirements in relation to expropriation. The External Social and Resettlement Specialist is accountable to the PMU E&S Manager and is responsible for:</p> <ul style="list-style-type: none"> • Following and keeping records of all payments made under national law and payments made from the RAP Fund in collaboration with disbursing parties; • Keeping records of land acquisition related grievances; • Planning, coordinating land acquisition related engagement activities with CLO; • Updating the RAP if needed (i.e. during RAP implementation if new impact groups emerge etc.); • Collecting the data for the preparation of the quarterly RAP internal monitoring reports; • Monitoring and managing any immediate issues of non-compliance with the RAP and remedial action required; • Reporting (to PMU E&S Manager) any immediate issues of non-compliance with the RAP and remedial action required; • Appointing the External Independent Monitoring Consultant; • Monitoring the temporary land acquisition activities of Contractor(s), and the implementation of associated RAP activities; • Overseeing the implementation of the SEP, with support from the Community Liaison Officer (CLO); and

⁴⁶ Other channels should grievances include the General Government Complaints Hotline (the Cabinet) and the Citizens’ Complaints Department in NAT, which receives complaints submitted to NAT about any project and transfers them to the competent departments to take the necessary measures.

Entity	Roles and Responsibilities
	<ul style="list-style-type: none"> Overseeing and supporting RAP related grievance management including periodic reporting of grievances to PMU.
Community Liaison Officer (CLO)	<p>The CLO is responsible for implementing the SEP, including responsibility for the preparation of consultation material for, consulting and engaging with PAPs. NAT will make effort to assign both a male and female CLO to the Project. They also conduct regular inspections of records relating to grievances received and their resolution. The CLO is responsible for:</p> <ul style="list-style-type: none"> Following and recording of grievances related to land acquisition; Planning, coordinating and implementing land acquisition related engagement activities with External Social and Resettlement Specialist; Keeping and reporting records of completed engagement activities to Social Specialist; Updating of SEP when needed; Preparing and distributing flyers, leaflets, brochures, information packages on the Project to relevant stakeholders; Conducting meetings, interviews and group discussions with impact groups and other stakeholders regularly and keep records of these meetings; Inputting to the preparation of the quarterly RAP internal monitoring reports; and Reporting (to Social Specialist) any immediate issues identified through grievance mechanism or engagement activities that may be in non-compliance with the RAP.
Compensation Committee	<p>The Compensation Committee is formed to bridge the gap between national law and international requirements/ standards for Lenders. This is a mechanism adopted by NAT to compensate PAP categories not covered by Egyptian Law 10/1990. The Compensation Committee is formed based on a request submitted by the head of the authority to the Minister of Transport.</p> <p>The role and responsibilities of the Compensation Committee are:</p> <ul style="list-style-type: none"> Negotiating with informal PAP Categories that not included in Egyptian law (informal users (21 PAPs) and vulnerable groups which includes the elderly, women and individuals with income at or below the poverty line). The Compensation Committee engages with the PAPs to determine the value of impact on the subject asset(s) and their livelihoods to determine a value for negotiation. The assessment works carried out by the Compensation Committee considers informal users of impacted assets as well as vulnerable groups. The Committee will propose compensation at full replacement cost or other livelihood restoration measures that replace and restore (or if possible, improve) livelihoods before pre-Project levels (as described in Chapter 9: Entitlements and Compensation and Chapter 11: Livelihood Restoration Plan; Receiving grievances, whether from (formal) landowners or informal users. The Compensation Committee assists the official owners in communicating with the relevant government authorities to resolve such grievances, if raised; Working in collaboration with CLO and External Social and Resettlement Specialist in receiving and resolving any grievances received related to compensation; and Conducting consultation activities with informal PAPs.

Entity	Roles and Responsibilities
<i>Technical Government Support</i>	
Alexandria Governorate, Directorate of Real Estate and Taxes	The Alexandria Governorate Directorate of Real Estate and Taxes conducts land acquisition and compensation payment within Egyptian legal framework. It provides required documents for ownership/tenure status in affected communities.
Alexandria Directorate of Agriculture	The Alexandria Directorate of Agriculture is responsible for the valuation of trees according to the price list of trees and crops that is updated annually and approved by the Directorate of Agriculture and the Governor.
ESA and ASD	The ESA is responsible for evaluating private land parcels subject to expropriation and calculating the compensation to be paid out to landowners. The ASD is responsible for: <ul style="list-style-type: none"> • Conducting the survey of the lands and assets that included in the expropriation decree; • Issuing a list that includes surface area planned for expropriation, location, owner name, compensation evaluation; • Sending an official notification to owners of land and assets clarifying surface area, location, owner name, compensation evaluation; and • Receiving objections/grievances related to the previous items and submitting them to the Court of First Instance in the jurisdiction area where the land acquisition takes place and the court, in turn, files the lawsuit, if required.
The Ministry of Endowments	The Ministry of Endowments coordinates the process of demolishing mosques ⁴⁷ with the MOT. The ministry conducts consultation activities with community members and based on this consultation establishes alternative mosques or contributes to the establishment and expansion of existing mosques prior to construction.
Department of Legal Affairs	The Department of Legal Affairs is responsible for legal issues relating to land tenure and/or ownership and resolving disputes.
Ministry of Solidarity	The Ministry of Solidarity is responsible for reducing the impacts of resettlement on vulnerable groups (stationary informal vendors, mobile informal vendors) during and after resettlement by conducting a socio-economic survey of PAPs.
Alexandria Governorate	The Governorate Authority and Districts are responsible for: <ul style="list-style-type: none"> • Providing the construction permits for new stations; • Providing approval for additional surveys and site work to be carried out in relation to RAP preparation and implementation; and • Coordination between the Project and the Traffic and Roads Department to facilitate construction along the road and crossings.

⁴⁷ Mosques built on ENR land along the Project alignment.

Entity	Roles and Responsibilities
<i>Key Land Acquisition Stakeholders</i>	
Lenders	The EBRD, EIB, AIIB and AFD (collectively known as ‘the Lenders’) are considering financing the Project. The Lenders will require the submission of reports that monitor the environmental and social performance of the Project against their specific policies for mitigating environmental and social issues and impacts. This includes the implementation of this RAP. The Lenders role is to provide their feedback for and approval of the RAP, as well as, to issue a no objection letter to start construction. The Lender’s is provided with regular information that confirms NAT’s monitoring of the land acquisition process and compliance with the Lender’s policy requirements, national legislative requirements and EU legislative requirements, as described in Chapter 3: Legislative Framework .
Ministry of Finance	The Ministry of Finance is responsible for depositing the financial allocations for each ministry in accordance with the decisions of the President of the Republic and the Prime Minister. Therefore, it is responsible for allocating the compensation included in the land acquisition ministerial decision within the financial provisions of the MOT for the benefit of the Project. The Compensation Committee includes a representative from the General Authority for Governmental Services, which affiliated to the Ministry of Finance.
ENR	The ENR Property Department is responsible for providing NAT with maps showing the ENR properties located within the scope of the Project. ENR compiled an inventory of the tenants of the shops located in the existing stations, in addition to, the occupants inside the Project alignment corridor. A representative of ENR is a member of the Compensation Committee.
External Independent Monitoring Consultant	The External Independent Monitoring Consultant (appointed by NAT) will conduct in-depth external monitoring reviews, and report progress against the RAP every 6 months as described in Chapter 12: Monitoring and Reporting . This consultant will also complete a spot check of a sample of valuation reports developed by NAT.
Construction Contractor	The Contractor appoints a Land and Permits Officer, responsible for temporary land acquisition during construction, in accordance with the processes and compensation measures in the RAP, including land entry and exit protocols, and permissions to enter permanently acquired land for the Project. The Land and Permits Officer is also responsible for the return of land to either NAT or landowners (if required), and the resolution of any grievance related to the Contractor’s land acquisition processes, and for obtaining any permits required from the local authorities.

9. ENTITLEMENTS AND COMPENSATION

This Chapter describes the eligibility of categories of displaced persons for compensation and other resettlement assistance. The chapter also includes an entitlement matrix (**Table 9-2**) that addresses the categories of losses and entitlements related to the relevant Project components for all PAPs according to the type of impact and loss, including landowners, shop tenants, mosque and occasional users. The chapter also includes a description of the valuation methodology (**Section 9.5**) for losses to determine the cost of their full replacement, compensation and to provide further livelihood assistance and support where needed.

9.1 Eligibility Categories and Principles

Under Egyptian law, the only people and entities entitled for compensation are those with registered property rights. For example, these include registered landowners, occupants, users and those with registered third party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration.

Under the Lender’s requirements, all the land needed for a Project is subject to Eligibility Criteria for compensation, which includes the following categories:

- Category 1: those who have formal legal rights to land (including customary and traditional rights recognized under Egyptian Law);
- Category 2: those who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws; and
- Category 3: Those who have no recognizable legal right or claim to the land they are occupying (e.g. squatters).

Under this Project all the categories (1, 2 and 3) will be considered for compensation in accordance with Lender’s requirements. All PAPs will be compensated for their loss of assets and livelihoods, regardless of their legal status. Compensation includes financial or technical support so that PAPs are able to restore their livelihood to pre-displacement levels or to levels prevailing prior to the beginning of Project implementation, whichever is higher.

Table 9-2 below provides eligibility criteria and requirements for each of the impact categories distributed by impact groups that are defined in the entitlements matrix (**Table 9-2**).

It is expected that business owners and employees will be the most significantly affected by economic displacement, due to the loss of shops / kiosks / cafeterias currently used in existing the stations. These PAPs will therefore not only be provided cash compensation for their loss of livelihoods but will also be entitled to additional livelihood support measures to ensure that they do not experience economic hardship due to the Project.

During July, August and September 2022 the Compensation Committee carried out consultations with all informal mobile and stationary vendors, as well as the tenants of the shops located within the existing stations, discussing the entitlements matrix according to each case of PAP. Only the eligibility criteria and rights under the entitlements matrix have been discussed. Negotiations are to take place

prior to land acquisition. As part of the RAP negotiations, NAT will explain case by case each PAP specific or business specific entitlement will be negotiated. The GLAC that has been prepared together with this RAP, will be disseminated by NAT in order to ensure meaningful consultation is carried out to inform PAPs and businesses of their rights not only by Egyptian law but through additional means provided through the RAP and LRP under the Project (refer to **Section 10.6 Guide to Land Acquisition and Compensation in Chapter 10 Information Disclosure and Consultation**).

NAT will explain to PAPs what is included in the entitlements matrix and LRAPs to provide eligible PAPs with the opportunity to apply for these packages where they can confirm their eligibility. PAPs will need to provide the requested information that is provided in **Table 9-1** below. NAT will provide support and assistance to vulnerable PAPs with this process (such as completing paperwork, legalising leases, etc.), if needed, and details of this support will be communicated through consultation meetings, negotiation meetings and ongoing stakeholder engagement activities. This support can be provided through one to one sessions with vulnerable PAPs after consultation meetings.

Table 9-1: Eligibility supporting documentation by impact and PAP category

Impact	PAP Group	Information Required
Loss of privately owned urban commercial non-arable land or access to it	Landowners / shareholders including vulnerable (Land parcels relating to depot land, Bab Sharq Station and Sporting Station)	<ul style="list-style-type: none"> • Proof of residency • Ownership/use status • Proof of entitlement, such as title deeds • Details of the land and income loss • Whether the owners/ shareholders are categorised as poor (yes or no)⁴⁸ • Gender (female/male) • Age⁴⁹ • Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no)⁵⁰ ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Loss of privately owned urban commercial non-	Formal tenant and formal user of land for the car wash business	<ul style="list-style-type: none"> • Proof of use e.g. formal rental/usufruct agreement or verbal agreements in place with owner

⁴⁸ According to the Central Agency for Public Mobilization And Statistics CAPMAS, the average poverty line is 736 EGP per person per month, a family consisting of two adults needs 1667 EGP per month to meet its basic needs, a family consisting of two adults and two children 2,691 EGP per month. The poverty line was built for each family according to its age and gender structure and its place of residence (Poverty Indicators, Income, Expenditure and Consumption Research, CAPMAS, 2017-2018).

⁴⁹ Proof of age required to establish eligibility for LRAPs available for PAPs over 65 years of age.

⁵⁰ Those who are cumulatively impacted by this Project and other investments/ projects recently complete or ongoing or yet to commence.

Impact	PAP Group	Information Required
arable land or access to it	on Bab Sharq Station location including vulnerable	<ul style="list-style-type: none"> • Details of the land and income loss (i.e. if 20% or more of their productive land is affected, etc.) • Whether the owners/shareholders are categorised as poor (yes or no) • Gender (female/male) • Age • Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Permanent loss of commercial buildings and structures or access to them	Owners for the currently vacant former copper factory buildings on the depot land including vulnerable	<ul style="list-style-type: none"> • Ownership/use status of the structure and/or building • Proof of entitlement, such as title deeds • Whether the owners are categorised as poor (yes or no) • Gender (female/male) • Age • Whether the owners have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Permanent loss of structures or access to them	Formal tenants and formal users that own structures including vulnerable - business owner with a small, covered structure (shelter) used for car wash activity at Bab Sharq.	<ul style="list-style-type: none"> • Use status of the structure and/or commercial building, including rental / usufruct agreements • Whether the formal tenants are categorised as poor (yes or no) • Gender (female/male) • Age • Whether the formal tenants have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Permanent loss of trees	Owners of the 5 palm trees on depot land including vulnerable	<ul style="list-style-type: none"> • Proof of ownership e.g. verbal agreements in place with owner and/or testaments from witnesses confirming ownership of trees

Impact	PAP Group	Information Required
Temporary loss of land and all other assets or access to it during construction phase	Landowners / shareholders including vulnerable (Currently non-existent ⁵¹)	<ul style="list-style-type: none"> • Proof of residency • Ownership/use status • Proof of entitlement, such as title deeds • Details of the land and income loss • Whether the owners/shareholders are categorised as poor (yes or no) • Gender (female/male) • Age⁵² • Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Temporary loss of land and all other assets or access to it during construction phase	Formal tenants and formal users of land (Currently non-existent)	<ul style="list-style-type: none"> • Use status of the structure and/or commercial building, including rental / usufruct agreements • Whether the formal tenants are categorised as poor (yes or no) • Gender (female/male) • Age • Whether the formal tenants have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Temporary loss of land and all other assets or access to it during construction phase	Informal users of land (Currently non-existent)	<ul style="list-style-type: none"> • Proof of ownership (verbal) • Witness statement confirming informal use • Land user categorised as poor (yes or no) • Gender (female/male) • Age • Having any disability (yes or no) • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no)

⁵¹ NAT has stated that all construction activities will be carried out within the planned designated right of way. Currently, there is no additional land that will be temporarily used for construction activities. However, this entitlement has been included as a precautionary measure in the event that temporary land is found to be needed by the construction Contractor.

⁵² Proof of age required to establish eligibility for LRAPs available for PAPs over 65 years of age.

Impact	PAP Group	Information Required
		<ul style="list-style-type: none"> ○ Women-headed household (yes or no) ● Evidence of welfare support provided by the State
Permanent loss of rented business premises (shop, kiosk, cafeteria) inside stations	<p>Shop business owners including vulnerable</p> <p>Tenants with formal valid contracts with ENR for shops.</p> <p>Tenants with expired legal contracts with ENR who are still paying rent inside the stations.</p> <p>Tenants with no contractual agreements.</p>	<ul style="list-style-type: none"> ● Proof of business ownership (formal or verbal) ● Rental agreement with ENR ● Details of the land used by business ● Business owner categorised as poor (yes or no) ● Gender (female/male) ● Age ● Having any disability (yes or no) and/or have a family member with a chronic illness who is part of the affected PAP household ● Qualifications and previous experience (CV and references, if available) ● Other business-owned assets ● If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Permanent loss of livelihood	<p>Stationary tenant with formal lease agreement.</p> <p>Stationary informal vendors with no rental agreement.</p> <p>Plus, vulnerable PAPs permanently affected by loss of income due to interrupted business activities⁵³.</p>	<ul style="list-style-type: none"> ● Business owner status ● Proof of business ownership (formal or verbal) ● Details of income loss to business owner ● Business owner categorised as poor (yes or no) ● Gender (female/male) ● Age ● Having any disability (yes or no) ● Qualifications and previous experience (CV and references, if available) ● Other business-owned assets ● If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Permanent loss of livelihood	<p>Stationary business employees including vulnerable of stationary shops, kiosks and cafeterias permanently affected by loss of income due to interrupted business activities (including employees of</p>	<ul style="list-style-type: none"> ● Business employee status ● Proof of employment contract (formal or verbal) ● Details of income loss to employee ● Business employee categorised as poor (yes or no) ● Gender (female/male) ● Age ● Having any disability (yes or no) ● Qualifications and previous experience (CV and references, if available) ● If vulnerable,

⁵³ It is currently not anticipated that any shops externally adjacent to the Project alignment will experience any business interruption (i.e. by road closure, etc).

Impact	PAP Group	Information Required
	businesses outside the Project alignment, if there is any impact during construction activities)	<ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Permanent loss of livelihood	Informal mobile vendors (business owners) with no rental agreement.	<ul style="list-style-type: none"> • Business owner status • Proof of business ownership (verbal) • Witness statement confirming informal use • Business owner categorised as poor (yes or no) • Gender (female/male) • Age • Having any disability (yes or no) • Qualifications and previous experience (CV and references, if available) • Other business-owned assets • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Limited or restricted access to houses, shops and other establishments externally adjacent to Project alignment during construction	Property owners and tenants with legal title (Currently non-existent)	<ul style="list-style-type: none"> • Ownership/use status of the structure and/or building • Proof of entitlement, such as title deeds • Proof of business ownership (formal or verbal) • Rental agreement • Whether the owners/tenants are categorised as poor (yes or no) • Gender (female/male) • Age • Whether the owners/tenants have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) • Evidence of welfare support provided by the State
Damage to houses, shops and other establishments externally adjacent to Project alignment during construction	Property/business owners (Currently non-existent)	<ul style="list-style-type: none"> • Proof of property/business ownership (formal or verbal) • Rental agreement / witness statement confirming informal use • Details of the affected property/business • Property/business owner categorised as poor (yes or no) • Gender (female/male) • Age • Having any disability (yes or no) • Qualifications and previous experience (CV and references, if available) • Other business-owned assets • If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no)

Impact	PAP Group	Information Required
		<ul style="list-style-type: none"> ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ● Evidence of welfare support provided by the State
		<ul style="list-style-type: none"> ● Proof of business ownership (formal or verbal) ● Rental agreement with ENR / witness statement confirming informal use ● Details of the affected business ● Business owner categorised as poor (yes or no) ● Gender (female/male) ● Age ● Having any disability (yes or no) ● Qualifications and previous experience (CV and references, if available) ● Other business-owned assets ● If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Temporary loss of livelihood	Business employees including vulnerable of stationary shops, kiosks and cafeterias temporarily affected by loss of income due to interrupted business activities	<ul style="list-style-type: none"> ● Business employee status ● Proof of employment contract (formal or verbal) ● Details of income loss to employee ● Business employee categorised as poor (yes or no) ● Gender (female/male) ● Age ● Having any disability (yes or no) ● Qualifications and previous experience (CV and references, if available) ● If vulnerable, <ul style="list-style-type: none"> ○ Illiterate (yes or no) ○ Cumulatively affected (yes or no) ○ Previously subject to expropriation (yes or no) ○ Women-headed household (yes or no) ○ Evidence of welfare support provided by the State
Damage to houses, shops and other establishments during construction⁵⁴	Property/business owners and tenants in cases of owned building extensions, including vulnerable	<ul style="list-style-type: none"> ● Proof of residency ● Ownership/use status ● Proof of entitlement, such as title deeds ● Details of the land and income loss ● Type of affected parcel ● Owners categorised as poor (yes or no) ● Gender (female/male)

⁵⁴ NAT confirms that construction will be pre-planned, taking into account the condition of the existing buildings, through the geotechnical study that will be prepared by the EPC contractor, who will survey the condition of all structures near the construction sites prior to construction commencing. The EPC Contractor will also be responsible for using construction techniques to avoid damage and, in the event, damage does occur, will compensate and repair such damage, if required.

Impact	PAP Group	Information Required
		<ul style="list-style-type: none"> • Age • Whether the owners have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household

Eligibility of PAPs will be assessed and confirmed by NAT during LRAPs consultations and the preparation of the LRP.

9.2 Entitlement Matrix

People, businesses and households recorded by the census and identified during the assets inventory are entitled to compensation and livelihood assistance. Entitlements are defined according to the categories of affected people, households and businesses with consideration of the level of impact caused by the land take requirements of the Project. Entitlements under the Project can be classified under three categories: i) compensation for loss of land and assets (and access to land and assets); ii) compensation for loss of income; and iii) resettlement/livelihood restoration and vulnerability assistance. There are different categories of people and businesses affected by the Project who are entitled to compensation and socio-economic recovery as described in **Section 9.1**.

All PAPs identified prior to the cut-off date shall be entitled to compensation, according to the compensation principles of land acquisition law and the Lender’s requirements as described in **Chapter 3: Legal Framework**. It is important to note that the compensation value for loss of land and assets is based on the full market price prevailing in the governorate, in addition to, transaction costs for the replacement of the subject asset which would meet the full replacement cost requirements of the Lenders.

The approved Entitlement Matrix was discussed and agreed in a meeting with the Compensation Commission on 9 June 2022 with all the participants, with final approval by NAT on [1 March 2023⁵⁵].

Table 9-2 presents the entitlement matrix for the different categories of PAPs who were identified in the Project according to the type of loss/ impact on PAPs.

⁵⁵ The NAT formal signed approval issued on [14 May 2023].

Table 9-2: Entitlement Matrix for Affected Persons

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
Permanent loss of land (complete or partial)				
Loss of privately owned urban commercial non-arable land or access to it	Landowner/ Shareholder of land parcels designated for: (1) New Kafr Abdou station and depot land; (1) Bab Sharq Station; and (2) Sporting Station.	1 Company 196 6 4	Provide cash compensation ⁵⁶ , in accordance with national requirements, for loss of land, calculated using market price within the year of the ministerial decree. ⁵⁷ The cash compensation provided also includes 3 years' lost income that would have been generated through this land. Landowner has the right to request the purchase and compensation of any portion of the land if the remaining section of the land parcel is not economically usable (unviable land).	AND Provide cash compensation at full replacement cost, including cash compensation for the cost of moving, or the cost of moving any movables from the land as a result of the land acquisition for the project. This will apply for the land described in Section 4.1.2 Land Acquisition of Private Lands . Other Allowances: Assistance through the RAP fund ⁵⁸ to be provided for transportation for moving to new location. Further details on legal costs are provided in Section 9.3 below.
Loss of privately owned urban commercial land or access to it	Formal tenant and formal user of land for the car wash business on Bab Sharq Station location.	1	No provision is provided under National law.	Rental allowance in accordance with the conditions of the rental agreement for 3 months ⁵⁹ . Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate. Other Allowances: Tenants will be notified after receiving their compensations, after the disclosure of the list of PAPs published and notified to PAPs in accordance with Law No. 10 of 1990 and its amendments. NAT has the right to notify the PAPs of the date of starting work according to the project schedule and the implementation of work contracts with implementation contractors, at least one month from the date of notification by NAT (or special case by case provisions depending on the specifics of the tenancy agreement). Assistance to be provided for legal costs (see Section 9.3 below) and transportation for moving to new location. Any further costs associated with new tenancy registration. Livelihood restoration programmes will be developed as described in Chapter 11: Livelihood Restoration Plan and offered to this category of PAP by NAT on a case by case basis to include access to temporary and permanent employment opportunities.

⁵⁶ According to the results of the consultation activities conducted by the RAP team with the landowners, they have no objection to cash compensation.

⁵⁷ This compensation is proportional to the percentage of land owned by each shareholder at the time of acquisition. This will apply for the lands described in "**Section 7.1.2 Land Acquisition of Private Lands**": (1) The depot (El Nahas land); (2) The new station (Bab Sharq); and (3) The new station (Sporting). This compensation amount includes compensation for non-use of the land for a maximum of three years and transaction costs included, the land owner does not bear any legal costs for registration or transactions of ownership.

⁵⁸ **Section 9.6** RAP Fund explains the special standalone budget that is established to cover land-based impacts of a Project that are not covered by national law but should be covered to comply with Lender's requirements.

⁵⁹ Rental allowance will be provided for a period of 3 months as a minimum, with the possibility of extending the rental allowance by a further month or increased amount assessed and agreed on a case by case basis.

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
Permanent loss of Commercial Buildings, structures and Trees (complete or partial)				
Loss of commercial buildings and structures or access to them	Owner(s) for the currently vacant former copper factory buildings on the depot land.	1 Company	Provide cash compensation, in accordance with national requirements, for loss of assets, calculated using market price within the year of the ministerial decree. This compensation is proportional to the percentage of asset owned by each shareholder at the time of acquisition.	<p>Provide cash compensation at full replacement cost. The affected persons and their crops will be compensated by the Alexandria Survey Directorate in accordance with Law No. 10 of 1990 and its amendments, will also publish the disclosure list of PAPs and notify the PAPs and determine all compensation values, conceding that the compensation will be at the full replacement cost, including cash compensation for the cost of moving.</p> <p>OR</p> <p>Assistance in relocation of secondary structure to replacement land provided, where possible.</p> <p>Other Allowances:</p> <p>Owners notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction.</p> <p>Right to salvage affected material, with the agreement of the owner.</p> <p>Assistance to be provided transportation for moving to new location.</p> <p>Livelihood restoration programmes will be offered as described in Chapter 11: Livelihood Restoration Plan to this PAP to improve livelihood-supporting secondary structures.</p>
Loss of structures or access to them	Formal tenants and formal users that own structures - business owner with a small, covered structure (shelter) used for car wash activity at Bab Sharq.	1	Provide cash compensation, in accordance with national requirements, for loss of structures and other assets, calculated using market price within the year of the ministerial decree. (Compensation for structures and other assets is included in the compensation for land) ⁶⁰	<p>Provide cash compensation at full replacement cost, including cash compensation for the cost of moving, or the cost of moving any movable structures from the land as a result of the land acquisition for the project from the national valuation total and improvements made to the structure.</p> <p>OR</p> <p>Assistance in relocation of secondary structure to replacement land provided, where possible.</p> <p>Other Allowances:</p> <p>Formal user notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction.</p> <p>Right to salvage affected material, with the agreement of the owner.</p> <p>Assistance to be provided for legal costs (see Section 9.3 below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration, if required.</p> <p>Livelihood restoration programmes will be offered as described in Chapter 11: Livelihood Restoration Plan to this PAP to improve livelihood-supporting secondary structures.</p>

⁶⁰ The valuation of structures and other assets will be covered within the compensation paid for the land, only if there is an official agreement between the landowner and the tenant/user(s). The Survey Directorate will consider this agreement and estimate a compensation for the impacted structure and/or other assets and provide to the landowners. The landowner will then pay the amount calculated for the structures to the tenant/user who owns this structure. NAT will be responsible of monitoring this process to ensure that the formal tenant/user is provided with this compensation by the landowner.

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
Loss of trees	Owners of the 5 palm trees on depot land.	Awaiting information from ASD⁶¹	Provide cash compensation, in accordance with national requirements, to be calculated by the Agricultural Directorate.	Provide cash compensation at full replacement cost, including cash compensation for the cost of moving. Other Allowances: Tree owner notified within the official valuation letter that the trees will need to be removed one month after compensation is paid prior to construction.
Temporary loss of land/ all other assets (complete or partial)				
Loss of land and all other assets or access to it during construction phase	Landowner / Shareholder	Currently non-existent ⁶²	Provide payment for rented land during construction based on the rental market rate ⁶³ . Return subject lands to the landowner in its original (or better) condition. Provide payment for any damages to land.	Compensation at full replacement cost for any damages to land and other assets including trees ⁶⁴ . Cash compensation for depreciation detracted from the national valuation total and improvements made to the structures. OR Assistance in relocation of secondary structure/trees to replacement land provided, where possible. Other Allowances: One month's advance notification of the owners to move prior to construction.
Loss of land and all other assets or access to it during construction phase	Formal tenants and formal users of land	Currently non-existent ⁶⁵	Provide cash compensation, in accordance with national requirements, for loss of structures and other assets, calculated using market price within the year of the ministerial decree. (Compensation for structures and other assets is included in the compensation for land) ⁶⁵	Rental allowance in accordance with the conditions of the rental agreement for 3 months. Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate. Other Allowances: Tenant notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement). Assistance to be provided for legal costs (see Section 9.3 below) and transportation for moving to new location. Any further costs associated with new tenancy registration. Livelihood restoration programmes will be offered as described in Chapter 11: Livelihood Restoration Plan to this PAP to improve livelihood-supporting secondary structures.

⁶¹ The final list of landowners to be provided by ASD is currently awaited by NAT; this information will be updated following receipt of this information.

⁶² NAT has stated that all construction activities will be carried out within the planned designated right of way. Currently, there is no additional land that will be temporarily used for construction activities. However, this entitlement has been included as a precautionary measure in the event that temporary land is found to be needed by the construction Contractor.

⁶³ The payment will be made through a negotiated agreement signed between the PAP and EPC Contractor. The EPC contractor will be responsible of all payments to be made to the landowners and also the reinstatement of land before returning to the landowner. NAT will ensure that this is included in the contracts of the EPC Contractor.

⁶⁴ The valuation of trees will be conducted by Alexandria Agriculture Directorate.

⁶⁵ The valuation of structures and other assets will be covered within the compensation paid for the land, only if there is an official agreement between the landowner and the tenant/ user(s). The Survey Directorate will consider this agreement and estimate a compensation for the impacted structure and/or other assets and provide to the landowners. The landowner will then pay the amount calculated for the structures to the tenant/user who owns this structure. NAT will be responsible of monitoring this process to ensure that the formal tenant/user is provided with this compensation by the landowner.

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
Loss of land and all other assets or access to it during construction phase	Informal users of land	Currently non-existent ⁶⁵	No provision is provided under National law.	<p>Rental allowance in accordance with the conditions of the rental agreement for 3 months.</p> <p>Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate.</p> <p>Other Allowances:</p> <p>Informal user notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement).</p> <p>Assistance to be provided for legal costs (see Section 9.3 below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration.</p> <p>Livelihood restoration programmes will be developed as described in Chapter 11: Livelihood Restoration Plan and offered to this category of PAP and they will include access to temporary and permanent employment opportunities.</p>
Permanent loss of Livelihoods/ Income or Access to Income (Commercial, Business)				
Loss of rented business premises (shop, kiosk, cafeteria) inside stations	Tenants with formal valid contracts with ENR for shops.	5	No provision is provided under National law.	<p>Ensure no forced eviction takes place for expired contracts.</p> <p>AND</p> <p>At least 3-months' notice to be given to all the tenants.</p> <p>AND</p> <p>Provide an alternative location for businesses inside the current stations across the Project, where possible.</p> <p>In case of relocation, cash compensation equal to 3 months up to 6 months⁶⁶ net income (lost profits) plus cost of lost certificates / licenses / patents. The income is based on the official tax declaration.</p> <p>Other allowances:</p> <p>Transitional assistance in the form cash compensation for each case⁶⁷ will be provided to re-establish the business at a suitable location.</p> <p>Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in Chapter 11: Livelihood Restoration Plan.</p>
	Tenants with expired legal contracts with ENR who are still paying rent inside the stations.	1		
	Tenants with no contractual agreements.	2		

⁶⁶ Depending on the duration of a business' transition following relocation for the re-establishment of the business and restoration of livelihoods. This decision must be based on an assessment for each business owner carried out by a Social Officer prior to the decision, documented and fully agreed with the business owner.

⁶⁷ Cash compensation for the assistance will include transportation of goods, tools, tables, showcases and signed; electrical connections; and decoration works

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
Loss of livelihoods	Stationary tenant with formal lease agreement. Stationary informal vendors with no rental agreement.	1 14	No provision is provided under National law.	In case of relocation, cash compensation equal up to 6 months' ⁶⁸ net income (lost profits) plus cost of lost certificates / licenses / patents. The income is based on the official tax declaration. AND In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business. Other allowances: At least 3-months' notice to be given to all the tenants. Transitional assistance (in-kind) will be provided to re-establish the business at a suitable location. Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in Chapter 11: Livelihood Restoration Plan .
Loss of livelihoods	Stationary business employees (including employees of businesses outside the Project alignment, if there is any impact during construction activities)	4	No provision is provided under National law.	In case of relocation, loss of income in the period between ending employment prior to expropriation and recommencement of employment (up to 3 months' net income) will be compensated ⁶⁹ . AND In case of business shutdown or in the event that the employee terminates their contract, payment of 3 month's salary (based on a signed receipt from the business owner) will be provided. Employees will be informed at least 1 month before the exact date of termination of their contract to facilitate finding an alternative job. Other Allowances: If employment is no longer provided after expropriation, access to NAT Livelihood Restoration Plan as described in Chapter 11: Livelihood Restoration Plan and assistance in finding similar, nearby employment, will be provided.
Loss of Livelihoods	Informal mobile vendors ⁷⁰ (business owners) with no rental agreement.	6	No provision is provided under National law.	In case of permanent loss, cash compensation equal up to 6 months' net income (lost profits) plus cost of lost certificates / licenses / patents. The Compensation Committee will organise a meeting with the affected informal business owner, who will review informal business activities and determine the net income lost for 1 year. AND

⁶⁸ Depending on the duration of a business' transition following relocation, the proposed 6 month's net income cash compensation could be reduced to cover only the period required for the re-establishment of the business and restoration of livelihoods. However, should this be the case, this decision must be based on an assessment for each business owner carried out by a Social Officer prior to the decision, documented and fully agreed with the business owner.

⁶⁹ Cash compensation to be paid directly by the Compensation Committee or the governorate authority through the RAP Fund. The employee will receive the payment through the tenant who will be required to provide a proof of receipt to the Compensation Committee signed by the worker and including date, amount and mode of payment.

⁷⁰ Those falling under this category of mobile and informal vendors inside the railway corridor and include wooden kiosks and small shops selling clothes / vegetables / food. Based on the site visit and socio-economic survey, the mobile and informal vendor locations are permanently located inside the corridor.

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
				<p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p>Other Allowances:</p> <p>At least 3-months' notice to be given to all the informal vendors.</p> <p>Transitional assistance (in-kind) will be provided to re-establish the business at a suitable location.</p> <p>Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in Chapter 11: Livelihood Restoration Plan.</p>
Houses, Shops and Other Establishments Externally Adjacent to the Project Alignment⁷¹				
Limited or restricted access to houses, shops and other establishments during construction	Property owners and tenants with legal title	Currently non-existent ⁶⁵	<p>No compensation for shops on state owned land (owned by ENR or governorates) as they will be transferred to NAT.</p> <p>In the event that the shops are built on private land owned by individuals or any other non-governmental entity, cash compensation will be paid based on the market value of the land and structures.</p>	<p>Cash compensation for depreciation detracted from the national valuation total and improvements made to the structure.</p> <p>Arrangements to be made to allow continuous access to and from impacted houses and establishments that will also be aligned with the Project's Traffic Management Plan and Community Health and Safety Plan that will be implemented by the EPC Contractor during construction. In addition, bidding documents for the Contractor should reference or include this RAP. If not, the Contractor should be committed to mitigating any of the construction related limitations and access to land as well as damage to property and assets.</p>
Damage to houses, shops and other establishments during construction	Property/ business owners	Currently non-existent ⁶⁵	Cash compensation to be paid by the EPC Contractor for houses and structures damaged by the Project's construction activities.	<p>Cash compensation or in-kind support provided to fully repair the damage. This will be assessed and estimated by specialists, with follow-up remedial action taken by the EPC Contractor.</p> <p>In the event that houses and/or establishments are damage and require the relocation of PAPs, compensation at full replacement cost for any damages to these will be provided by the EPC Contractor ensured during the follow up of NAT, or a rental allowance will be provided for the duration of the relocation, if needed. Refer to Chapter RAP Methodology Section 5.3.4 sub-heading "House Sample" for further details.</p> <p>Coordination with relevant authorities and institutes in accessing similar alternative house or establishment for rent with better or improved quality and security of tenure.</p> <p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p>Other Allowances:</p> <p>Assistance to be provided for legal costs (see Section 9.3 below) and transportation for moving to new location.</p>

⁷¹ The design of the Project, as well as the Project's needs for the lands that have been identified so far, do not require the removal of any homes or residential buildings, but the residential buildings have been added to the entitlements matrix due to the possibility that the houses externally adjacent to the Project may be affected by excavation activities, especially in the area located in the viaduct section where houses were closed to the Project alignment, which are: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr.

Damage to structures is to be managed by the EPC contractor. In principle, no severe damages should occur because EPC has to undertake all necessary studies and technical mitigation. If despite efforts damages occur these are to be dealt by the contractor with the supervision of NAT (or maybe PMU). In addition, NAT will appoint a technical consultant (not SYSTRA) to supervise the EPC contractor during implementation.

Type of Loss	Category of PAP	Number of PAPs	Entitlement	
			Compensation to meet National Requirements	Compensation to meet Lender's Requirements
				Livelihood restoration programmes will be offered as described in Chapter 11: Livelihood Restoration Plan .
Vulnerable Groups				
Impact on Vulnerable PAPs	Illiterate PAPs Clinically vulnerable to COVID-19 PAPs with disabilities and chronic illness Location-dependent elderly persons Women headed households Poor PAPs PAPs taking on the role of primary carer for household member Individuals who have not had regular wage-based income with a job at which they work more than one year.		No provision is provided under National law.	Additional assistance will be provided to these PAPs to address specific needs. NAT will support the implementation of all applications in accordance with the national social support programmes offered by the Ministry of Social Solidarity ⁷² as described in Chapter 11: Livelihood Restoration Plan . Special assistance will include: <ul style="list-style-type: none"> • Enrolment in Government social assistance, if not yet enrolled; • Social assistance (discussion groups); • Enrolment in vocational training through the training centres of the Ministry of Industry; • Priority in Project-related employment for members of vulnerable households (if at legal working age); and • Access to NAT Livelihood Restoration Plan as described in Chapter 11: Livelihood Restoration Plan for poor households.

⁷² In the event of such cases, the Ministry of Social Solidarity will be involved, as it is the responsible body in such cases and has sufficient capabilities

9.3 Assistance with Legal Costs

In addition to the cash and in-kind compensation and other allowances as described in the entitlements matrix (**Table 9-2**) above, all PAP categories are entitled to cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.. Except for landowners who are compensated in accordance with national law, the land owner does not bear any legal costs for registration or transactions of ownership.

9.4 Transportation Costs

When assets are required to be moved due to expropriation, NAT will cover the costs of transporting these assets using local haulage, shipping and courier providers to replacement land or other locations provided by PAPs. It has been confirmed by NAT that no temporary storage will be required for shops to temporarily store stock, material, etc. prior to occupation of new premises. Assets for transportation could include:

- Demolished material (debris);
- Fencing and gates;
- Sheds and containers;
- Kiosks;
- Cafeterias equipment (tables, chairs, etc.);
- Wood tables and metal stands installed with these tables; and
- Shop signs and front.

9.5 Valuation Process and Methodology

The valuation of losses in assets depends on the type of the lost asset (land/structures). According to lenders requirements, the market value is assessed to estimate the full replacement cost of land/structures, which considers the market value of the asset plus transaction costs such as taxes, stamp duties, legal and notarization fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of property. The evaluation process for the land parcels listed in the land acquisition ministerial decree was carried out by a specialized committee from the ESA and ASD. Compensation for economic activities that are not covered by the national law is currently being evaluated by a specialized committee (the Compensation Committee) with experience in the requirements of Egyptian law and takes into account the evaluation is carried out in accordance with the international requirements of lenders.

9.5.1 Forms and Calculation of Compensation

Although the type of compensation may be an individual’s choice, compensation in kind (such as land-for-land) is preferred. Compensation refers to both compensation for expropriated assets and livelihood restoration of income.

Compensation for property and assets are estimated according to the prevailing market prices at the time of the land acquisition decision, and an additional (20%) twenty percent of the value of the estimate is included in the compensation based on Law No. 24/ 2018.

Table 9-3: Forms of compensation and calculation methods

Types of Compensation	Calculation Method
Cash Payments	Compensation will be calculated and paid in Egyptian Pounds. Rates will be adjusted for inflation.
Similar alternatives structures	Compensation may include alternative structures equivalent to those which were affected, such as shops and mosques.
Other Assistance	Assistance may include moving allowance, transportation and labour, title fees, or other related costs.

9.5.2 Valuation of Land parcels

Both land and assets are valued and compensated for according to the following standards/ requirements and as appropriate for the Project:

- Compensation values are based on full replacement cost, as of the date that the full replacement is to be provided or at the date of Project identification, whichever is higher.
- Full market prices for land are determined based on their value on the local market, plus costs such as taxes, stamp duties, legal and notarisation fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of the land.
- The Project will assure security of tenure.

The above valuation method will be applied to the following land parcels for the Project:

- 1. The depot:** El Nahas land, estimated at 204,436 m².
- 2. The new station (Bab Sharq):** The construction of the Bab Sharq station will require additional land from two adjacent plots of land, namely:
 - The first is administrative building owned by the Health Directorate in Alexandria (approximately 869 m²). Compensation for this building requires coordination between NAT and the Health Directorate in Alexandria (coordination meetings are currently being held) in order to account for the employees and services provided to citizens via the building. Additionally, there may be a possibility of providing alternative offices through the Health Directorate in which NAT is responsible for payments related to the cost of equipping the offices.
 - The second is a privately owned land with no facilities. It is currently being utilized as a parking lot and car wash business (approximately 632 m²).
- 3. The new station (Sporting):** The construction of the Sporting station will require additional land from two adjacent plots of land,

- The first land is currently being used as warehouse owned by ENR (approximately 852 m²). It is included in the ministerial decision of land acquisitions that was issued for the Abou Qir Project, and its ownership will be transferred to the NAT directly as it is owned by the Ministry of Transport, and thus considered an internal transfer of ownership.
- The second is a privately owned land with no facilities. It is currently being utilized by the landowners as a car garage (approximately 887 m²) used for storage purposes.

ESA and ASD Valuation Committee: The ESA and ASD conducts a land survey to identify all assets, structures and facilities occupying the land. The compensation estimated by ESA includes the total value of the structures/assets on the land. Through the land survey, the ASD describes everything that is included in the private land (structures, facilities, infrastructure, etc.). Compensation includes the value of the land (the price of the land) and other assets. This applies only to private lands listed in the ministerial decree for expropriation.

The ASD has issued the final cash compensation value for the landowners, and lists are currently being prepared that include the names of the owners, the area and compensation for each of the landowners. This value includes full replacement cost and the 20% markup required under national law.

Alternative land as compensation: Land of equal size and location, with similar or improved public infrastructure facilities and services should be provided, if available. If this is not possible, cash compensation at replacement cost will be provided.

9.5.3 Supplementary Valuation for Unviable Land

If the Project divides a land parcel to the extent that the remaining section(s) are not suitable for further use or access is restricted, the landowner has the right to request from NAT that the remaining section(s) also be acquired. In order to prevent such situations, NAT will proactively consider the remaining land prior to acquisition, and if this land is considered unviable, will include this land in the early compensation discussions. The compensation entitlements and valuations for unviable land will be the same as for privately owned urban commercial non-arable land parcels, as detailed in **Table 9-2: Entitlement Matrix for Affected Persons** .

9.5.4 Valuation of Compensation for Use of Temporary Land

The Contractor will obtain access to areas that are required on a temporary basis, during the construction phase, through a willing buyer-seller or rental agreement. NAT will ensure that the Contractor provides a fair and transparent payment to the landowner as defined by the Entitlement Matrix (**Table 9-2**) based on the Lender’s requirements and they will monitor payments.

9.5.5 Valuation of Other (Non-Land) Assets

Cash compensation for buildings and structures will be paid for shops, kiosks and other impacted structures, however where possible alternative locations / shops will be proposed. The right to salvage material will also be granted, in which case no cash compensation will need to be disbursed other than for transportation and relocation as needed.

9.5.5.1 Kiosks, Cafeterias And Shop Tenants inside the Current Railway Stations/ outside Project Alignment

There are 8 shops/ Kiosks, cafeterias identified within the stations that will be removed. The Compensation Committee is currently consulting with the shop tenants regarding the available alternative compensation options. The following alternatives will be offered:

- Shops belonging to MoT in other areas near to the location of the current shop.
- Cash compensation for loss of livelihood as described in the entitlements matrix (**Table 9-2**).

The compensation committee began working on the ground since May 17, 2022, reviewing the lists received from ENR, during the months of July, August and September 2022. Consultations have been carried out and negotiations will follow as a next step with all informal mobile and stationary vendors, as well as the tenants of the shops located within the existing stations to discuss entitlements that apply to each category of PAPs.

The Project's land requirements do not necessitate the removal of any shop outside the corridor. However, these shops have been considered due to the possibility of damage occurring due to Project construction activities, especially in the area located at the following stations: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and to El Montazah where the Project alignment will be elevated (the viaduct area)⁷³.

Structures, Commercial Buildings and Trees

The Project's land requirements do not necessitate the removal of any houses or residential buildings. However, the residential buildings have been added to the compensation matrix due to the possibility of houses adjacent to the Project alignment potentially being damaged by construction activities, especially in the area located at the following stations: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr where the Project alignment will be elevated (the viaduct area). Any damage to structures, should it occur, will be paid by the EPC Contractor as required under their agreed contract.

The value of compensation for potentially affected houses is estimated by the ASD, the Directorate of Housing in Alexandria and the Directorate of Real Estate Taxes, in addition to, the Compensation Committee. The houses are evaluated according to the following criteria:

- Location in the area/ district;
- Number of floors and condition of the building;
- Type of building materials, paints, facade/ wall finishes and utilities available;
- The area of the land on which the house is built;
- The cost needed to rebuild the dwelling (labour, transportation of building materials, permit, etc.); and
- Prevailing market price.

⁷³ The EPC is responsible to consider any potential risk and mitigate such risk accordingly through the development of his design as the Contract is Engineering, Procurement and Construction. Moreover, such risks will be subject the construction method of EPC Contractor. At this stage, neither NAT or SYSTRA are not in position to confirm that the risk exists or does not exist. In addition, NAT will appoint a technical consultant (not SYSTRA) to supervise the EPC contractor during implementation.

However, if permanent relocation is required due to planned activities based on assessments such cases will be covered under this RAP by NAT.

The ASD Valuation Committee will conduct a land survey and identify all assets, structures and facilities. This land survey is separate from the baseline studies/surveys that are required to be undertaken by EPC Contractor prior to construction. NAT PMU and the Compensation Committee will request a specialized technical committee to be formed on behalf of NAT to examine the condition of the building and assess the risk of damage occurring during construction.

The trees valuation will be carried out by the Alexandria Agriculture Directorate, according to the price list of trees and crops that are updated annually and approved by the Agriculture Directorate and the Governor. Trees evaluation includes; tree type, name, age, fruitful or non-fruitful. The compensation value excludes the costs associated with transportation and relocation of trees which is covered under the entitlements matrix.

9.5.5.2 Compensation for Mosques

A total of 13 mosques will be removed, the following procedures are followed to estimate mosque compensation:

- coordination between NAT and the Ministry of Endowments (the responsible authority for all mosques in Egypt) to obtain consent for the planned expropriation (already completed as mentioned above).
- Officials of the Endowments Ministry will conduct consultation activities with the local community around the mosques that will be removed, through the imams of the mosques. Consultations will focus on the proposed alternatives, including the construction of a new mosque or expansion of an existing mosque, in order to reduce any inconsistency and potential conflicts that could arise from removing mosques.
- Establishing alternative mosques or contributing to the establishment and expansion of existing mosques, which will be completed prior to construction.
- Following the completion of the Abou Qir Metro Project, vacant land parcels in the areas where a viaduct is established may be used for the construction of the alternative mosques.
- There will be no additional compensation for the workers of the mosques as the few assigned by the Ministry of Endowments have been assigned to new posts. People on voluntary duty during prayer times (only 5 times a day for shorts periods) are not impacted in terms of livelihood and will not be compensated for.

9.5.6 Valuation of Income and Livelihood Losses

The goal of the entitlements matrix is to compensate, restore, and whenever possible, improve the livelihoods of PAPs in re-establishing and strengthening current livelihood practices in the short and medium term. In addition, the **Livelihood Restoration Plan (Chapter 11)** will provide measures to develop transferable skills and create self-reliance for PAPs in the long term.

This plan considers the following elements:

- Identification of all PAPs who will be economically affected by the Project;

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- Detailed estimations for their monthly income to be defined in cooperation with the Governorate and the District Authority in order to calculate the needed compensation. The proposed value will be consulted and agreed with the PAPs.

According to the socioeconomic survey (undertaken in April/May 2022) and the Compensation Committee, the number of stationary informal vendors inside the Project right of way is (21), which include wooden kiosks and small shops selling clothes / vegetables / food. Based on the socioeconomic survey, the stationary informal vendors are located inside the Project corridor. Livelihood restoration assistance included in the **Livelihood Restoration Plan (Chapter 11)** will include some of the following:

- Provision of skills training;
- Access to jobs;
- Provision of personal documents; and
- Provision of micro loans.

The livelihood support includes business owners and employees located inside the stations or those outside the Project right of way.

The Compensation Committee in cooperation with some government agencies (such as the Ministry of Social Solidarity) work to support vulnerable groups affected by the Project by paying cash compensation to groups not covered under Egyptian law. This approach is applied on a case by case basis by the Ministry of Social Solidarity for each vulnerable PAP separately as described in **Chapter 11: Livelihood Restoration Plan**.

9.5.7 Valuation of Other Support and Assistance

The Project will develop and implement a livelihood assistance program (See **Chapter 11: Livelihood Plan**) aimed at assisting those who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status who are impact by the Project. PAPs in the form of stationary informal vendors and mobile informal vendors⁷⁴ may be less able to participate, more adversely affected and have limited ability to take advantage of the benefits of the livelihood restoration support.

9.5.8 Compensation for Vulnerable Groups

National legislation does not provide special provisions or assistance to vulnerable groups who may be affected by expropriation. Additional assistance will be provided to households with vulnerable people to address specific needs, to meet Lender’s requirements, and it will be provided under the separate RAP Fund. Vulnerable groups include: the poor, female-headed and cumulatively affected households (including significantly affected PAPs as described in **Section 6.4 of Chapter 6: Affected People and Assets**, and those households taking care of at least one person that is elderly, sick or disabled, families headed by women, the main wage earner in the family is physically disabled, poor families (total family income is less than the minimum wage) and illiterate/ uneducated PAPs. Special assistance will be provided to these vulnerable groups, as detailed in **Table 9-2: Entitlement Matrix for Affected Persons** and **Chapter 11: Livelihood Restoration Plan**.

⁷⁴ Individuals and/or groups who may lose their source of livelihoods as a result of land acquisition.

9.6 RAP Fund

The RAP Fund is a special standalone budget that is established to cover land-based impacts of a Project that are not covered by national law but should be covered to comply with Lender’s requirements.

The RAP Fund considers the following principles:

- Fair and transparent evaluation of impacted assets and livelihoods;
- Compensation of loss at replacement cost;
- Method of compensation of economic loss not regulated under applicable Egyptian legislation;
and
- Disadvantages that would be created by Project impacts.

RAP Fund is a supplementary fund formed by NAT based on international standards and good practices in order to compensate economic losses sustained and to be sustained by PAPs and impacted businesses but who are not recognised under national law.

10. INFORMATION DISCLOSURE AND CONSULTATIONS

This Chapter describes the consultation approach adopted during the RAP implementation and the grievance mechanism to be used to resolve any disputes that may arise.

Stakeholder consultation has informed the design and development of the Project, in addition to, the Project-specific land acquisition and livelihood restoration measures presented in this RAP. The aim of these consultations is to provide accurate and timely information on the Project to the public, affected communities and PAPs, including potential Project impacts and the land acquisition process. This Project information is presented in a format that is easily understood by all stakeholders to ensure constructive and meaningful consultation and informed participation in compensation negotiations. Effective land acquisition planning requires regular consultation with PAPs and affected communities, in addition to, local and state authorities, civil society organizations and other groups that have a significant role in shaping or affecting the Project, either positively or negatively.

Lender’s requirements describe consultation requirements for projects involving physical and economic displacement. These are clearly described in EBRD PR10 and EIB Standard 10.

The Project will have an assigned CLO as described in **Chapter 8: Institutional Arrangements** to ensure regular consultation and interaction with affected local communities during Project implementation.

10.1 Engagement Activities during the ESIA

During the Project preparation and as indicated in the Pre-ESIA consultation chapter, the first scoping meeting should start as early as possible in the ESIA process to ensure the full engagement of stakeholders. The consultation activities were designed to comply and meet the Lender’s requirements and include affected communities, NAT, MOT, EEAA, other government Ministries, agencies and NGOs. Consultation and participatory activities were considered during this early phase of the ESIA to ensure that the assignment is clearly shared and verified with various groups of stakeholders. During and following the scoping meetings, all views and concerns raised were documented and issues raised during the scoping meetings were considered in the ESIA.

In addition, the project was disclosed through various channels during the preparation of the ESIA study summarised below.

Table 10-1: Disclosure Channels during Preparation of ESIA

Disclosure Channel	Description
Consultation sessions	Two Consultation sessions were held in Alexandria Governorate on 28 July 2021. Third consultation session was held in Alexandria Governorate on 6 November 2021.
Posters and banners	Posted at all stations on 15, 16 and 25 July 2021. Distribution of invitations in markets and communities surrounding the Abou Qir metro corridor for citizens to attend (advertisements were distributed in the markets on 14, 15, 23 and 24 July 2021.

Disclosure Channel	Description
	Publication of the Posters at all Abou Qir train stations 28 October 2021. Distribution of leaflets inside the Abou Qir train carriages and to the kiosks and shops in the stations 28, 29 October and 1 November 2021.
Media	<ul style="list-style-type: none"> Announcement was published in Al-Jumhuriya newspaper on 14 July 2021; Announcement was published in Al-Gomhoria newspaper on 25 October 2021; and Publication of the invitation on NAT's website on 25 October 2021.

10.2 Engagement Activities for the RAP

A series of consultation meetings were undertaken by the RAP Team during the development of the RAP in April and May 2022. All the consultation meetings were conducted either face to face or virtually via zoom.

The purpose of these consultation meetings was to:

- Inform the RAP;
- Obtain views and concerns of the local community on the Project; and
- Involve local communities in the decision-making process during the design, construction and operation stages.

The consultation meetings consisted of:

- 2 consultation Meetings with active NGOs in the Alexandria (as detailed in **Table 10-2 and Appendix 6**);
- Meetings with government departments, including the Alexandria Endowments Directorate, the Community Development Association - Sharq District, ASD and ESA (as detailed in **Table 10-3 and Appendix 7**);
- 2 FDGs with women (as detailed in **Table 10-4, Table 10-5 and Appendix 8**); and
- 2 FDGs with shops externally adjacent to the Project alignment (as detailed in **Table 10-6 and Table 10-7 and Appendix 9**).

The RAP team conducted FDGs with the tenants of the shops adjacent to the alignment, as well as the residents in the apartment buildings where inquiries (especially regarding compensation) and concerns of these groups were addressed. Additional meetings and consultation activities have also taken place with all PAPs subject to the socio-economic survey, through which details of compensation measures in the entitlements matrix were also communicated.

10.2.1 Consultation meetings with active NGOs

The 2 meetings with the active NGOs, the Young Men's Christian Association (YMCA) and Caritas, were conducted on 9 March 2022 and 10 March 2022 respectively. Minutes for the NGO consultation meetings are presented in **Appendix 6**.

Table 10-2: NGO Meetings

Meeting	Meeting Location	Attendees	Summary
Young Men's Christian Association	YMCA headquarters in Alexandria	Mr. Bahjat Aziz - Financial Director of the Association Ms. Iman Fahmy - General Director Assistant of the Association	<p>The general perception of the Project is good, but YMCA noticed through the discussions in the ESIA disclosure sessions that officials in the governorate and members of the community have many concerns, including:</p> <ul style="list-style-type: none"> • Providing alternative transportation before the Abou Qir train stopped working; • Traffic problems in Alexandria, and the possible increase in the construction phase of these problems; • The traffic density on the side streets in Alexandria and the poor condition of these streets; • Long construction time, which can increase these problems; and • The structural condition of the old houses closest to the Project route and the possibility of it being affected by the construction. <p>YMCA pointed out the importance of the construction works programme as Alexandria City is busy with tourists in the months of July, August until mid-September.</p>
Caritas	Online - Zoom meeting	Dr. Hany Moris - Alexandria Branch Manager	<p>Key concerns raised by Caritas included potential problems and traffic jams during the construction of the Project and potential displacement of residents from residential buildings externally adjacent to the Project alignment. All community groups will benefit from the Project, as this is a public services project, but this can depend on the price of the metro ticket. If the ticket price is high, this Project will be unhelpful for groups who are unable to afford the metro as a form of public transportation.</p>

10.2.2 Meetings with government departments

Meetings were carried out with each of the Alexandria Endowments Directorate on 27 April 2022, the Community Development Association - Sharq District⁷⁵ on 11 June 2022, ESA on the 10 March 2022 and ASD on the 9 March 2022. Minutes for the consultation meetings with these government departments are presented in **Appendix 7**.

Table 10-3: Government department meetings

Meeting	Meeting Location	Attendees	Summary
Department of Mosques in the Alexandria Endowments Directorate	The Office of the Director of the Alexandria Endowments Directorate	His Excellency Sheikh, Undersecretary of the Ministry and Director of the Directorate of Endowments in Alexandria. Engineer Ibrahim Abdel Hamid, Director of the Mosques Department in the Directorate of Endowments in Alexandria.	Background information was obtained on how Alexandria Endowments Directorate is involved with the mosques, the current activities at the mosques, the process by which the mosques were acquired by NAT, the consultation activities carried out, the grievance mechanism in place and the compensation paid.
Community Development Association - Sharq District	Headquarters of the association in Smouha	Mr. Osama Mustafa, Deputy Director of the Association.	Shop tenants are concerned about impacts on their businesses, including whether they will be resettled. The association has been informed from the head of Montazh Awal District that representatives of NAT confirmed that the Project will be built on ENR property and will not affect the current locations of the shops situated externally adjacent to the Project alignment corridor. The association has been advised that all construction activities will take place within the current railway corridor. The Community Development Association emphasised that the development of the Project is important for all the people of Alexandria, but it is important that all information is clarified before construction begins, including whether Project result in the removal of the shops externally adjacent to the Project alignment.

⁷⁵ The association represents the tenants of the shops externally adjacent to the Project alignment in the Victoria and Asafra areas. These shops are rented from the association with usufruct contracts that are renewed annually, with tenants paying the rent annually. These shops have been affiliated with the association for more than 40 years (since 1978).

Meeting	Meeting Location	Attendees	Summary
ESA	The Office of the Director of the Valuation Department at the ESA	Engineer Ragaa Salem - Director of the Valuation Department at the ESA.	An explanation was provided in relation to the role of ESA in land acquisition and the valuation process and criteria were described.
ASD	Office of the Alexandria Survey Directorate Director.	Engineer Safaa Ahmed - Director of the Directorate. Engineer Al-Hassan Saber - the engineer surveying the lands for the Project.	An explanation was provided in relation to the role of ASD in land acquisition and the valuation process and criteria were described.

10.2.3 Women FGDs

Details of the 2 FGDs for women only led by representatives of the RAP Team are provided in **Table 10-4**.

Table 10-4 Women Only FGDs

FDG	Venue	Date / Time	Attendees
1	Celebration halls (Princess Hall) in Bakoos area near Ghebrial station	12 May 2022 12pm-2pm	(14) women from Ghebrial and Bakoos areas
2	Al Zahiria area - Ezbet Al-Safih in the street adjacent to the Project alignment corridor	12 May 2022 7pm- 8:30	(19) women from Al Zahiria area

The RAP team presented an introduction about the Project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness with the Project, but made it clear that they had many concerns and questions that they needed to answer clearly, because this would determine their perceptions on the Project.

The attendees presented their concerns and questions and the RAP team responded according to the available information. **Table 10-5** shows the topics raised during the FGDs and the RAP team's response to them.

Table 10-5 Summary of Women Only FGD Discussions

	Topic	Response
1	<p>The project’s land needed (expropriation of houses)</p> <p>We do not have clear information about the Project.</p> <p>Will the houses adjacent to the Project path be removed?</p> <p>Does the plan to establish the Project will require the removal of houses?</p> <p>Will the land of the houses be expropriated/ what is our situation in the event that houses demolitions?</p> <p>What are the procedures that will be taken if any damage occurs to a house as a result of construction work?</p> <p><i>It should be considered that we do not have any alternatives to move, as these houses in which we live are the only housing for us, and their demolition and removal for the benefit of the project means our homelessness.</i></p>	<p>The final design of the project does not include the removal of any houses. The Project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any houses.</p> <p>In the event that any house is damaged as a result of construction activities (excavation), the National Authority for Tunnels is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p> <p>Regarding the actions to be taken in the event of any damage to any house as a result of construction work; The house will be inspected and examined by a technical committee to assess the damage, and the measures that must be taken for the safety of the residents, bearing in mind that these measures are taken very quickly.</p> <p>The construction contractor is responsible for determining the risks that may arise from the construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p>
	<p>What information do you want to know? What are the best channels to share information with you?</p> <p>We would like to know the following:</p> <ul style="list-style-type: none"> - Notify us of construction dates well in advance of its start, especially in areas that will have excavations, - In the event that the construction of the project affects the existing facilities (water connections, electricity, sewage, telephones), we must be notified before that, 	<p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p>Grievance Channels</p> <p>The following are the main channels through which grievances will be received:</p> <ul style="list-style-type: none"> • Engineering representative on-site: <u>It has not been identified yet</u> • NAT Website: Contact Us • Direct mail to the Chairman of NAT: chairman@nat.org.eg • Planning Department: pld@nat.org.eg

	Topic	Response
	<ul style="list-style-type: none"> - Will there be a direct communication channel for us on the construction site? - How to communicate with those responsible for the project in case of damage from any construction activities 	<ul style="list-style-type: none"> • 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 <p>People can also submit questions / comments related to the project through the project's email address created specifically for the project, alexandriametro.nat@yahoo.com.</p> <p>All required information raised in today's discussion will be taken into account and shared with the project officials from NAT.</p>
2	<p>Actions to be taken by NAT for women (metro users) during operation</p> <p>Will a metro car be reserved for women or not?</p>	<p>NAT is currently adopting several measures to ensure the safety of all passengers for the Cairo Metro Line. Where all stations have surveillance cameras. The Cairo Metro Line 3 also includes surveillance cameras in all its metro cars, and the Alexandria metro line is expected to do the same.</p> <p>There are numerous grievance channels in place for passengers as well, including a hotline, WhatsApp support and Facebook page. Additionally, there are support booths for general grievances located across the line in the stations.</p> <p>The same measures will be taken for the Alexandria metro, while studying the most effective measures to protect the safety of women passengers on the metro, which may include allocating a car for women.</p>
3	<p>Railway alternatives during construction</p> <p>what is the alternative transportation for the train during construction?</p>	<p>NAT in cooperation with the Alexandria Public Transportation Authority, has studied the best alternatives that are provided before the train stops working. Indeed, alternative transportation has been provided, which is currently being tested, and work has begun on the streets of Alexandria in the areas surrounding the Abou Qir train track.</p>
4	<p>Is the project serious or not, because it has been postponed more than once?</p> <p>what is the start date for project implementation?</p>	<p>Yes, the project is serious, and almost all the studies required to be prepared before construction have been completed.</p>

	Topic	Response
		<p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which requires that the study be prepared and compensation implemented before any project construction activities begin.</p>
5	How high is the metro above the surface (viaduct area)?	The height of the metro above the surface in the viaduct area is 6 m, according to the data received from the engineering consultant for the Project (SYSTRA).
6	<p>At the present, a brick wall separates our houses from the railway corridor. this brick wall is used to collect waste which collected from houses and has become a source of unpleasant odour and insects, in addition to the fact that the railway corridor is used during the night to sell and use drugs by some outlaws.</p> <p>What are the measures that will be taken to restructuring the area under the viaduct?</p> <p>Will the brick wall separating the houses and the railway corridor be removed after the metro construction?</p> <p>We hope that the brick wall will be removed and the area under the viaduct restructured so that it becomes an access for the community. we are currently suffering in case of needing an ambulance to enter the area, as well as from the endless accumulation of waste and the prohibited activities that take place inside the railway corridor at night.</p> <p>As residents of the area, the construction of the metro will be of great benefit to us, not only as a safe and clean means of transportation, but also because it will save us from many of the problems we suffer from at the present.</p> <p>Please take the restructuring of the area under the viaduct into consideration as a request from residents of Ghebrial and Al Zahiria areas.</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the Project and the safety and security of the viaduct.</p> <p>All your comments and recommendations that were raised in today's discussion will be shared with NAT officials, to be taken into account whenever possible, in line with the requirements of the construction and operation of the Project.</p>

10.2.4 FGDs with shops externally adjacent to the Project alignment corridor

Details of the 2 FGDs for shops externally adjacent to the Project alignment corridor led by representatives from the RAP Team are provided in **Table 10-6**.

Table 10-6 FGDs shops externally adjacent to Project

FDG	Venue	Date / Time	Attendees
1	A shop in Victoria area.	20 April 2022, 7:30pm- 9pm	(8) shop tenants from Victoria area.
2	Office of one of the shop tenants in Asafra area near to the Project alignment corridor.	14 May 2022, 12pm- 1:30pm	(14) shop tenants from Victoria and Asafra areas.

The RAP team presented an introduction about the Project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness that they are being consulted, because they have a lot of concerns and questions that they need to answer. They are worried because they are not aware of the decisions that will be taken in the next stage towards their shops.

The attendees presented their concerns and questions and the RAP team responded according to the available information. **Table 10-7** shows the topics raised during the FGDs and the RAP team's response to them.

Table 10-7 Summary of Adjacent Shop FDG Discussions

	Topic	Response
1	<p>The project's land needed (expropriation of shops area)</p> <p>Will the shops be removed for the construction of the metro project?</p> <p>Why was a socio-economic survey of some shop tenants? Are these sim shops removed and compensated?</p> <p><i>We have been renting these stores for a long time, some of them have been renting for about 40 years. The vast majority of us these shops represent our only source of livelihood.</i></p>	<p>The final design of the project does not include the removal of any shops adjacent to the Project corridor. The project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any shops adjacent to the Project corridor.</p> <p>The shops that will be removed are the shops inside the existing stations, and they have already been notified of this.</p> <p>The socio-economic survey was conducted on a random sample of the shops adjacent to the alignment corridor, due to its close proximity to the project site and the possibility of being affected during construction, and therefore it was taken into account during the preparation of the RAP study. But this does not mean that these shops will be removed.</p>
	<p>What will happen if the construction activities affect one of the shops, what are the procedures that will be taken in this case?</p>	<p>In the event that any shop will be affected as a result of construction activities, NAT is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p> <p>Regarding the actions to be taken in the event of any damage to any shop; the shop will be inspected and examined by a technical committee to assess the damage, and appropriate compensation for all damages will be assessed.</p> <p>The construction contractor is responsible for determining the risks that may arise from the construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p>
	<p>Is it likely that the construction of the project will require the area on which the shops are currently located? What actions will be taken in this case?</p> <p><i>Please bear in mind that many of these shops are not owned by ENR, but are owned by the Community Development Association in Alexandria, and we rent</i></p>	<p>In the event that the construction of the project requires the area in which some shops are currently located, the shops will be compensated according to the full replacement cost based on the national requirements of the Egyptian law as well as the international standards and requirements of lenders, NAT as the owner of the project is obligated to do so.</p>

	Topic	Response
	<i>the shops from them with a contract that is renewed annually and pay the rent for the whole year in advance.</i>	<p>Replacement cost is the market value as determined by an expert property, plus associated transaction costs; example labour cost for building structures or other fixed assets, plus transaction costs.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which requires that the study be prepared and compensation implemented before any project construction activities begin.</p> <p>The RAP includes all affected groups by the project as well as those who may be affected at a later stage.</p>
2	<p>We understood from you today, by presenting a description of the project, that the area in which the shops are located, the metro track will be elevated at a height of no less than 6 m; Does this mean the possibility of restructuring the area under the metro alignment (viaduct) and removing shops?</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the project and the safety and security of the viaduct.</p> <p>All your comments and concerns that were raised in today's discussion will be shared with NAT officials, to be considered, in line with the requirements of the construction and operation of the project.</p>
3	<p>Consultation activities with shop tenants</p> <p>We were not consulted except by the consultant who invited us to attend the public consultation session about a year ago, but the National Authority for Tunnels did not consult with us.</p> <p>Does this mean that the shops will not be removed?</p> <p>Why do we not have enough information about the project, and its land needs? Will we be notified in case the shops are demolished? We need to know more information on a regular basis, who will contact us for that?</p>	<p>A stakeholder engagement plan has been prepared for the Alexandria metro project, which includes a program for consultation with all parties involved in the project, including shop tenants. The consultation process is an ongoing process during the various stages of the project life.</p> <p>Please specify the information you would like to receive, and the best communication channels for obtaining information.</p>
	<p>We would like to know the following:</p> <ul style="list-style-type: none"> - Notify us of construction dates well in advance of its start, 	<p>The following are the main channels through which grievances will be received:</p> <ul style="list-style-type: none"> • Engineering representative on-site: <u>It has not been identified yet</u> • NAT Website: <u>Contact Us</u> • Direct mail to the Chairman of NAT: chairman@nat.org.eg

	Topic	Response
	<ul style="list-style-type: none"> - How to communicate with those responsible for the project in case of damage from any construction activities - In the event that the project needs to remove some shops, the tenants of the shops must be notified sufficiently in advance, and determine the compensation that is commensurate with the value of these shops, and give logical reasons for removing these shops from others. <p>The best channel of communication is direct communication with shop tenants, as well as through the Community Development Association and ENR, which are the parties that have been contracted with.</p>	<ul style="list-style-type: none"> • 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 <p>The Government Complaints/ Portal: www.shakwa.eg People can also submit questions / comments related to the project through the project’s email address created specifically for the project, alexandriametro.nat@yahoo.com.</p> <p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p>All required information raised in today's discussion will be considered and shared with the project officials from NAT.</p>
4	<p>what is the start date of the project implementation?</p> <p>Has a date been set for the train stopping and the start of construction activities inside the corridor?</p> <p><i>Please keep in mind that the back walls of the shops are the railway fence at the moment, the shops must be protected from the impact of the construction activities.</i></p>	<p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>NAT confirmed, during the preparation of the ESIA, that the construction contractor is responsible for protecting the shops adjacent to the alignment corridor from the impact of construction activities, and that the project design does not require removing the shops adjacent to the alignment corridor.</p>

10.3 Consultation Strategy for Land Acquisition

10.3.1 Means and Tools for Communication

All consultation activities that are carried out as part of the RAP will be in line with the Project **SEP** that was developed as part of the ESIA.

The Project will use different consultation approaches and methods for different stages of the Project activities and stakeholder groups. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

- Meetings, such as with the affected individuals and communities;
- Telephone calls, letters and emails;
- Information disclosure;
- Regular Project press releases; and
- Regular consultation with local communities to be undertaken by the CLOs.

Project Management Unit (PMU) Meetings

The PMU will be responsible for the implementation, financial management and overall delivery of the Project as well as the implementation of measures and requirements specified within the Project documentation. The PMU will undertake monthly meetings to:

- Review overall Project activities (concerning both technical, environment, health and safety and financial Project delivery);
- Integrate the provision of services of day-to-day activities at different stages, from preparation to implementation and evaluation including procurement;
- Review management of the construction Contractor and consultants;
- Escalate unresolved issues;
- Discuss common issues related to the Project and overcome any obstacles;
- Discuss employment opportunities;
- Ensure the appropriate implementation of training / information exchange; and
- Hold seminars / workshops to ensure the development of the PMU (particularly with regards to measuring performance indicators).

Regulatory / Technical Meetings

During the detailed design and construction stage, communications will be made with the relevant authorities and ministries to discuss regulations, permitting and Project relations.

Community Meetings

NAT will undertake community meetings with affected communities. As part of the consultations undertaken for the ESIA and RAP, contact information has been obtained in relation to all the affected communities and government authorities.

The CLOs (PMU and Contractor) will undertake monthly consultation meetings with the local community. Local communities will be provided with the Grievance Mechanism as described in **Section 10.5**.

The CLOs (PMU and Contractor) will keep in regular contact with affected landowners and users throughout the land acquisition process and post-land acquisition to ensure concerns are addressed.

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Focus Groups and Workshops (targeting vulnerable groups including women)

Vulnerable groups for the Project are identified as: PAPs with physical disabilities, women breadwinners, location-dependent elderly, illiterate and sole breadwinners. Ongoing engagement with vulnerable groups and focus groups will be facilitated by NAT to ensure minimum impact on these groups.

10.3.2 Vulnerable Groups

Opportunities for dialogue and consultation must be extended effectively to the full spectrum of affected persons, paying particular attention to the full participation in the consultation process of women, vulnerable and marginalised groups, in accordance with Lender’s requirements, and, where necessary, adopting additional/complementary special measures or procedures. Limiting such consultation to heads of communities and/or households alone risks missing key gender dynamics in households and, as a result, further deteriorating the standing of women. It is therefore important to hold also separate consultations with women only, possibly broken down by different age groups. This is planned for the Project in the form of FGDs for vulnerable groups, particularly for women. Verbal and non-written information will be made available through in person meetings for illiterate PAPs.

10.4 Planned Engagement Activities

10.4.1 Engagement Timeline for Land Acquisition

Table 10-8 below details all the stakeholder engagement activities that will be undertaken.

Table 10-8 Project Planned Engagement Activities

Stakeholders	Activity	Means of Consultation	Timeframe	Responsibilities
MOT	Consult for the public interest decision regarding land acquisition.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	Prior to identifying land-based impacts of the Projects to obtain public interest decision.	NAT Senior Management, PMU
	Continuous engagement for approval of compensation payments.		Throughout RAP implementation for the approval of compensation payments.	
Ministry of Finance	Consult for the allocation for funds for the Project.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	Allocation of funds Following the issue of the public interest decision.	NAT Senior Management, Compensation Committee
	Nominate a representative to participate in the Project Compensation Committee.		During the establishment of the Compensation Committee.	
ENR	Consult on the identification of shops that are located within the scope of the Project.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	After the issue of the public interest decision.	NAT Senior Management, PMU
Alexandria Directorate of Real Estate and Taxes	Consult during compensation payments within the legal framework.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	After census has been completed.	NAT Senior Management, PMU, External Social and Resettlement Specialist
Alexandria Directorate of Agriculture	Consult on the valuation of the trees.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	After census and asset inventory has been completed.	NAT Senior Management, PMU, External Social and Resettlement Specialist
ESA and ASD	Consult and cooperate on evaluating private land parcels subject to expropriation and calculating the compensation to be paid out to landowners.	<ul style="list-style-type: none"> Official letters Telephone communications 	During and following the development of the census and asset inventory data.	NAT Senior Management, PMU, External Social and Resettlement Specialist

Stakeholders	Activity	Means of Consultation	Timeframe	Responsibilities
		<ul style="list-style-type: none"> Meetings (face to face and virtually) Valuation reports 		
The Ministry of Endowments	Consult on the impacts and compensation of mosques to be demolished as part of the Project.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	During and following the development of the census and asset inventory data.	NAT Senior Management, PMU, External Social and Resettlement Specialist
Department of Legal Affairs	Consult on land ownership/tenure issues and resolving disputes.	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) 	Throughout RAP implementation.	PMU, External Social and Resettlement Specialist, CLO
Ministry of Solidarity	Consult on the development and implementation of the Livelihood Restoration Plan (refer to Chapter 11).	<ul style="list-style-type: none"> Official letters Telephone communications Meetings (face to face and virtually) Workshops 	Throughout implementation of the Livelihood Restoration Plan.	Social Specialist, External Social and Resettlement Specialist, CLO
Alexandria Governorate	Consult and coordinate with Alexandria Governorate to carry out on-site activities and obtaining any permits.	<ul style="list-style-type: none"> Project leaflets RAP GLAC Telephone communications Meetings (face to face and virtually) 	Prior to and during construction.	PMU, Social Specialist, External Social and Resettlement Specialist, CLO
NGOs and CBOs	Consult with relevant NGOs and CBOs to review and finalise the livelihood restoration assistance packages as described in the	<ul style="list-style-type: none"> Project leaflets RAP GLAC 	Implementation of the Livelihood Restoration Plan.	Social Specialist, External Social and Resettlement Specialist, CLO

Stakeholders	Activity	Means of Consultation	Timeframe	Responsibilities
	Livelihood Restoration Plan (presented in Chapter 11 of this RAP).	<ul style="list-style-type: none"> Telephone communications Meetings (face to face and virtually) NAT web-site 		
Affected landowners / business owners	Implement and undertake RAP, including: <ul style="list-style-type: none"> Appropriate distribution of the RAP and GLAC disclosure (see disclosure phase activities above)⁷⁶; Negotiation with landowners and users (formal and informal) to agree entitlements and compensation amounts, in line with the RAP; Continue consultation to ensure effective compensation disbursement; Further consultation during legal challenges, if required; Consultation stipulated as part of the grievance mechanism; Consultation to inform update Project schedule and progress; and Consultation as part of effective RAP monitoring. 	<ul style="list-style-type: none"> Project leaflets RAP GLAC Meetings NAT web-site 	During the implementation of the RAP.	PMU, Social Specialist, External Social and Resettlement Specialist, CLO

⁷⁶ The RAP team conducted FGDs and meetings with that took place with the parties concerned with evaluating the compensation (ESA, ASD and DEA (Appendix 7)), NGOs (Appendix 6), the FGDs with the tenants of the shops (Appendix 9) and the women living in the surrounding areas (Appendix 9). In addition to the consultation activities that took place with all PAPs during conducting the socio-economic survey, through which we explained the details related to compensation according to what was stated in the entitlements matrix.

Stakeholders	Activity	Means of Consultation	Timeframe	Responsibilities
	Hold a series of small focus groups with affected landowners, land users and local communities on shops and apartment buildings located externally adjacent to the Project alignment. The purpose of these small focus groups is to follow up on any effects that may occur as a result of construction activities on the economic activities surrounding the construction sites and vulnerable groups.	<ul style="list-style-type: none"> • Project leaflets • RAP • GLAC • FGDs • NAT web-site 	Prior to and during construction.	PMU, Social Specialist, External Social and Resettlement Specialist, CLO
	Disclose information about construction access and activities (including diversions, fencing, access, health and safety risks and signs, and map of the new temporary roads and crossings).	<ul style="list-style-type: none"> • Project leaflets • RAP • GLAC • FGDs • NAT web-site • Construction programme 	Prior to and during construction.	PMU, External Social and Resettlement Specialist, CLO
	Provide employment advertisements on NAT websites, on governorate office bulletin boards on the Project employment opportunities. Contractor will ensure that opportunities for local workers and businesses are provided (e.g. subcontractors, catering and accommodation) for local workers. They will also help their construction workers find new employment opportunities at the end of the construction phase, including training records and references.	<ul style="list-style-type: none"> • Employment Adverts • Local Procurement and Employment Plan • NAT web-site 	Prior to and during construction.	PMU, External Social and Resettlement Specialist, CLO, NAT Human Resources

Stakeholders	Activity	Means of Consultation	Timeframe	Responsibilities
	Details about employment opportunities and how NAT will enhance local jobs will be provided in a local employment plan. NAT will liaise with businesses within local areas to proactively identify job opportunities for PAPs.			
Vulnerable groups	Facilitate focus groups and workshops for affected vulnerable group, and facilitate ongoing consultation with vulnerable PAPs as part of the implementation of the Livelihood Restoration Plan (presented in the RAP).	<ul style="list-style-type: none"> • Project leaflets • RAP • GLAC • Focus groups discussions • NAT web-site 	Throughout RAP implementation.	External Social and Resettlement Specialist, CLO
Media	Share updates on Project progress and activities.	<ul style="list-style-type: none"> • Project leaflets • GLAC • NAT web-site 	Prior to and during RAP implementation.	PMU, External Social and Resettlement Specialist, CLO

10.4.2 Consultation and Disclosure of RAP

NAT will disclose relevant information about the Project in an ongoing manner as the Project evolves. The information will be provided in Arabic and will cover all the key stages of the Project including the construction and operational phases. The final and approved version of this RAP will be publicly disclosed on Lender’s websites.

In addition, a GLAC has been prepared and will be disseminated by NAT in order to ensure meaningful consultation is carried out to inform PAPs and businesses of their rights not only by Egyptian law but through additional means provided through the RAP and LRP under the Project (refer to **Section 10.6 Guide to Land Acquisition and Compensation** below).

10.5 Grievance Mechanism

NAT has an existing Grievances Mechanism. The process of receiving and managing grievances is described in the Project **SEP**. 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 is a 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.

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; and
- Monitoring grievance redress activities.

The PMU 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 Lender’s Requirements. Creating a timeframe where the aggrieved person has been provided with acknowledgment of receipt of their grievance with a pledge of a resolution, in addition to maintaining confidentiality, will result in amicable implementation of the Project.

The proposed mechanism is built on two tiers of grievances:

First tier of Grievances: Project level (on-site)

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The Project Manager on site (contractor) is responsible to ensure that the GRM system is widely promoted and clearly explained on a local level. Moreover, they 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 CLO 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. 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.

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:

- Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466
- Telephone: +20225742968
- Email: magdymadany@hotmail.com

10.6 Guide to Land Acquisition and Compensation

A land acquisition and compensation guide (GLAC) has been prepared together with the RAP to be distributed to all PAPs invited for negotiations. The aim of the guide is to provide basic information regarding the entitlements of the PAPs who are impacted by the Project.

The GLAC includes information on the following:

- Project description;
- Procedure to be followed for land acquisition, including legal requirements;
- Eligibility conditions for compensation;
- Valuation for compensating assets lost to the Project; and
- Answers to major concerns or frequently asked questions by PAPs who are both owners and users.

In order to ensure that entitlements of PAPs and businesses are timely communicated, the GLAC will be disseminated by NAT prior to any land acquisition taking place. Project CLOs, External Social and

Resettlement Specialist and Compensation Committee will be involved in carrying out and sharing this information verbally, in addition to, the distribution of the GLAC.

The initial consultation undertaken by the RAP team and the Compensation Committee has informed PAPs of the types of entitlements that are proposed in the entitlements matrix (**Table 9-2**) and feedback has been obtained. This feedback has been considered in developing the entitlements matrix. Further consultations on entitlements will be undertaken prior to and on finalisation of the RAP. The RAP will be updated as necessary if additional feedback is received.

11. LIVELIHOOD RESTORATION PLAN

11.1 Livelihood Restoration Objectives

As presented in **Chapter 6: Affected People and Assets**, this Project will require the acquisition of land parcels from private owners and the physical and economic displacement of PAPs. Economic displacement will be caused by the loss of business premises as a result of the Project activities and will impact formal and informal business owners (including stationary, mobile and informal vendors) as well as employees of these businesses. Impacts on business is also anticipated to result in the permanent and temporary loss of livelihoods⁷⁷, in addition to, temporary impacts such as nuisance during the construction phase.

This LRP provides a basis for NAT to develop and implement a full livelihood restoration plan to support the livelihoods of PAPs that will be economically displaced due to Project activities. This includes support to maintain and improve current economic activities, as well as provide alternative livelihood opportunities, with the aim of ensuring that PAPs are not economically disadvantaged in the long-term as a result of the Project. Further, in situations where vulnerable PAPs will be economically displaced, this LRP provides a basis for NAT to develop opportunities for these PAPs to improve their livelihoods.

This LRP is based on the information gathered during the Socio-economic surveys. It sets out the key livelihood restoration measures to be applied by NAT, addressing the gaps between national legislation and Lender’s requirements in relation to livelihood restoration of PAPs. NAT has approved and will apply the measures included in this Chapter to develop detailed Livelihood Restoration Assistance Packages (LRAPs) for PAP groups.

The LRAPs will be developed by NAT prior to the implementation of this RAP (as described in **Chapter 13: Implementation Schedule and Budget**). The LRP and LRAPs will be reviewed and updated by NAT PMU throughout its implementation.

11.2 Nationwide Ongoing Development Initiatives and Key Institutions

In developing this LRP, ongoing initiatives and organisations near the Project were taken into consideration. The following relevant initiatives and organisations were identified, and will be integrated in the LRAPs:

- Social welfare and Support programmes directed by the Ministry of Social Solidarity, which include:
 - **Solidarity and dignity “Takaful and Karama” (TKP) Programme⁷⁸** is a conditional cash transfer programme launched by the Ministry of Social Solidarity under the umbrella of developing social safety nets supported by the World Bank. This programme provides support to poor women and children, poor people with disabilities, poor orphans and poor widows aiming to

⁷⁷ “Livelihood” refers to the full range of means that individuals, families, and communities use to make a living, such as wage-based income, petty trade and bartering.

⁷⁸ <https://www.worldbank.org/en/results/2020/11/17/takaful-and-karama-a-social-safety-net-project-that-promotes-egyptian-women-empowerment-and-human-capital>

increase women’s decision-making powers, human capital in health and education and productive inclusion;

- **Chance "Forsa" Programme**, the programme represents an integrated system of empowerment and qualifications to enter the labour market. The programme aims to graduate beneficiaries of the national cash transfer programme, from being dependent on transfers from government aid to economic self-reliance by enabling them to engage in wage employment or sustainable economic enterprises;
 - **Social Solidarity Pension for the Disabled** is a permanent financial aid programme, one of the social welfare programs offered by the Ministry of Social Solidarity to support the disabled; and
 - **Micro and Small Enterprises Financing Initiatives**. Small business finance programmes help empower small business owners, such as fruit and vegetable sellers. Through these programmes, they can purchase a tricycle with an attached box used as a small transport vehicle” to sell vegetables/ fruits/ fish/ transport goods and be licensed. NAT can contribute to paying the transaction costs of microfinance initiatives to facilitate the involvement of the PAP in a programme that will provide him with a sustainable source of income and help improve his situation for the better⁷⁹.
- Vocational training programmes, through the Training provided by the Department of Productive Efficiency and Vocational Training - Ministry of Industry.
 - The National Council for Women, National Strategy Programmes for the Empowerment of Egyptian Women 2030. The strategy includes four integrated axes of action, including economic empowerment and social empowerment of women.

11.3 Livelihood Restoration Measures

Table 11-1 provides a list of the livelihood restoration measures that will be the basis on which NAT will develop the LRAPs. Vulnerable PAPs, including women who meet the vulnerability criteria, will be eligible for the same livelihood restoration measures as all other PAPs. As presented in **Chapter 4: Land Acquisition Process and Principles**, male and female PAPs will be consulted together with when choosing entitlements, including the most suitable LRAPs. This is to ensure that women’s preferences will be accounted for in the choice of livelihood restoration options. The measures listed in **Table 11-1** will be provided in addition to the entitlements included in the entitlements matrix in **Chapter 9: Entitlements and Compensation**.

⁷⁹ This is a proposal that can be benefited from through a cooperation protocol between the Ministry of Transport and the Ministry of Social Solidarity to achieve the greatest benefit from the programs offered by the Ministry of Social Solidarity.

Table 11-1: Livelihood Restoration Measures

Category	Livelihood Restoration Measure	Description
Business premises Tenants of shops located inside stations (Shop, Kiosk, cafeteria) Informal users within the Project alignment (Stationary informal vendors, Informal mobile vendors) Businesses externally adjacent to the Project alignment	Business support for business owner	<p>Businesses (formal and informal) will be affected by the Project (both business owners and employees), as detailed in Chapter 6: Affected People and Assets. NAT will provide the following assistance to affected businesses (support for employees is detailed in the next row):</p> <ul style="list-style-type: none"> • Support in accessing new markets for products/services and in advertising new business location to customers; • Access to technical experts/consultants in their sector to analyse business activities who will recommend improvements; and • Effectively and sensitively relocating business activities, if required. • Providing support for the sales of goods that were not sold before relocation or close of business.
	Support for employees	<p>NAT will support and financially assist the PAP to engage with suitable institutions that provide suitable training to the PAPs who are economically displaced and require either temporary employment while businesses are being relocated, or alternative employment if employment is no longer provided after the expropriation of a business.</p> <p>The following livelihoods have been identified as being potentially available for suitably qualified PAPs, on a temporary, or permanent basis:</p> <ul style="list-style-type: none"> • Temporary employment during construction – NAT will ensure that the Contractor provides a Local Procurement Plan to provide opportunities for local businesses and workers (e.g. subcontractors, catering and accommodation). The Contractor will establish a Local Employment Champion to work with NAT to facilitate PAPs employment in construction. The recruitment process will be clearly defined by NAT and the Contractor through this Plan, providing details on: how PAPs can apply, screening tests and eligibility criteria for available employment. • Permanent employment during operation – NAT will liaise with PAPs working temporarily during construction to provide employment opportunities during the operation of the Project. This could include metro maintenance, security, catering or cleaning roles. NAT will prioritise PAPs when recruiting for post-employment opportunities that become available during construction and operation. • NAT will liaise with businesses within these areas to proactively identify job opportunities for PAPs, if needed. <p>NAT will provide the following financial and administrative assistance if employment is no longer provided after the expropriation of a business:</p> <ul style="list-style-type: none"> • Support in registering those who are seeking employment; • Facilitate job placement;

Category	Livelihood Restoration Measure	Description
		<ul style="list-style-type: none"> • Provide opportunities for vocational skills development in local educational institutions; • Business management training; • Literacy, numeracy and language training; and • Classroom and on the job training. <p>NAT will work with supporting organisations to provide this assistance in establishing alternative livelihoods upon commencement of the implementation of the RAP and during the construction phase. This support will also be provided by NAT for up to 2 years into the operation phase of the Project.</p>
	Alternative livelihoods – new business development and support	<p>Some PAPs will prefer to begin new businesses themselves, rather than seek employment. For this category of PAPs, NAT will therefore provide training, administrative assistance and financial support. The eligibility criteria for each livelihood assistance should be set up and defined by NAT within the LRAPs to be developed.</p> <p>As part of this assistance, NAT will provide connections and costs for guidance and training on business establishment (legal forms and documentation, registration, business planning, equipment, recruitment etc.) until the business is established. Businesses that have monthly revenue less than 2,400 EGP will receive additional support by providing them, in full cooperation with the Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA)⁸⁰, with capacity building to operate a shop and micro-projects. A Memorandum of Understanding will be signed between NAT and MSMEDA to provide training sessions to the PAPs. NAT will also find potential access to credit, if required, and will monitor business activity for any issues and provide regular refresher training.</p>
	Business formalisation	<p>There are existing businesses that will be affected by the Project that are informal and are not registered as a company. NAT will assist these informal businesses with their formal registrations should they wish. NAT will provide administrative support and cover registration fees, such as:</p> <ul style="list-style-type: none"> • Workers and street vendors are registered in the labour office in the informal employment sector; and

⁸⁰ MSMEDA; Medium, Small and Micro Enterprise Development Agency. It was established by Prime Minister Decree No. 947 of 2017 and amended by Resolution No. 2370 of 2018. The agency is the authority concerned with the development of medium, small and micro enterprises and entrepreneurship and coordinates and unifies the efforts of all stakeholders, NGOs and initiatives working in this field. The agency aims to set a national programme for the development of projects and to create the necessary environment to encourage them. The Agency operates through a network of regional branches spread across the governorates with a total of 33 branches, in addition to partnership with about 600 NGOs concerned with developing micro-enterprises and 1800 bank branches scattered in all governorates and a number of local development partners.

Category	Livelihood Restoration Measure	Description
		<ul style="list-style-type: none"> Commercial activities registration is done in the Commercial Registry Department and a tax card is made at the Tax Office.
Special Assistance for Vulnerable Groups	Specific support for vulnerable PAPs with chronic illness and disabilities (including the location-dependent elderly with mobility issues)	<p>Vulnerable people who lose livelihoods will have some specific support measures in place, especially those with disabilities. All of these circumstances may limit their ability to have alternative livelihood opportunities or places that will need to be considered. This can be done through the following measures:</p> <ul style="list-style-type: none"> Integrating those who are able to work in vocational training programmes through the training centres of the Ministry of Industry, as well as vocational training through the empowerment programmes of the Ministry of Social Solidarity; Providing wheelchairs for PAPs who do not have the ability to move; Providing assistance in involving the elderly in relevant social care programmes provided by the Ministry of Social Solidarity (permanent pension/ financial aid). <p>In addition, NAT will ensure that compensation includes:</p> <ul style="list-style-type: none"> Providing a disability access opportunity such as mobility aids, if necessary. Including providing job opportunities in construction sites for the disabled in accordance with the national laws, through the construction contractor, with priority given to the disabled PAPs (Labour Law 12 of 2003 and Law No. 10 of 2018 Rights of Persons with Disabilities includes providing employment opportunities for the disabled at 5%); and Support to access to and register with national social support programmes offered by the Ministry of Social Solidarity. <p>This measure will target vulnerable PAPs who are significantly affected by loss of livelihoods.</p>
	Support to access to and register with national social support programme	<p>NAT will assist in collaboration with social services to ensure PAPs retain means tested benefits which might be lost due to income from compensation. In addition, assistance will be provided to assist in the registration of benefits to new places of residence (particularly for vulnerable people).</p> <p>Social programmes from the government are available to vulnerable groups. NAT will provide support and administrative assistance to eligible PAPs in accessing these programmes (if not already accessed).</p>
	Location-dependent elderly persons	<p>NAT will provide assistance and support to elderly persons from the eligible PAPs in accessing relevant government social welfare programmes available to vulnerable groups, through the Ministry of Social Solidarity programs (if they are not already registered).</p>

Category	Livelihood Restoration Measure	Description
		This measure will target vulnerable PAPs that do not have capacity to engage in other livelihood assistance packages provided for livelihood restoration.
	Women headed households	Supporting access to and registration in the national social support programmes to support the empowerment of female breadwinners and poor families (if they are not already registered with it), which is offered by the: <ul style="list-style-type: none"> • The National Council for Women; and • Ministry of Social Solidarity.
	Poor PAPs	Supporting access to and registration in the national social support programmes offered by the Ministry of Social Solidarity. NAT will provide assistance and support to eligible poor PAPs in vocational training programmes through the training centres of the Ministry of Industry for those who are able to work.
	PAPs taking on the role of primary carer for household member	NAT will provide assistance and support to eligible PAPs who are able to attend vocational training through the training centres of the Ministry of Industry, as well as, such training via the empowerment programmes provided by the Ministry of Social Solidarity. NAT can provide assistance and support to eligible PAPs to facilitate involving them in small and micro-enterprise financing initiatives programmes with the Ministry of Social Solidarity to improve living conditions. NAT can contribute to paying the transaction costs of microfinance initiatives to facilitate the involvement of the PAP in a programme that will provide PAP with a sustainable source of income and help improve his/ her situation for the better.
	PAPs who have not had regular wage-based income with a job at which they work more than one year.	NAT will provide assistance and support to eligible PAPs with vocational training through the training centres of the Ministry of Industry, as well as such training via the empowerment programmes of the Ministry of Social Solidarity. NAT will also provide priority in Project-related employment for members of vulnerable households (if at legal working age).

12. MONITORING AND REPORTING

12.1 Purpose

The PMU is required to establish a procedure to monitor and evaluate the implementation of the RAP and take corrective actions, as necessary, to achieve compliance with national legislation and Lender’s requirements. This Chapter sets out the monitoring and reporting arrangements and responsibilities that will ensure that the land acquisition and resettlement process is fully implemented in accordance with this RAP.

This RAP sets out measures to mitigate the potential negative impacts of physical and economic displacement that could be caused by the Project. The NAT Senior Management Team will approve and oversee the implementation of the RAP to ensure it is carried out in accordance with Lender’s requirements.

The NAT Senior Management Team will be responsible for appointing the PMU External Social and Resettlement Specialist to implement the RAP and conduct internal monitoring, with support from the PMU E&S Manager. The PMU External Social and Resettlement Specialist will be responsible for appointing an External Independent Monitoring Consultant who will undertake external monitoring, every 6 months, during implementation of the RAP alongside a completion audit.

The objective of the monitoring and reporting is to provide timely feedback to the NAT Senior Management Team and the Lender’s on the effective implementation of this RAP. It will also ensure that any unforeseen impacts, issues, and successes related to physical and economic displacement are identified as early as practicable. Appropriate measures will be identified to address such impacts and issues and maximise successes in livelihood restoration and improvement in a timely manner and will allow for adjustment to the RAP implementation process, where appropriate. RAP monitoring also facilitates grievance management aiming to reduce the number and scale of grievances raised by PAPs. Internal and external monitoring reports will be submitted to lenders periodically to align with their requirements.

12.2 Monitoring and Evaluation Framework

The monitoring and evaluation framework designed for this RAP includes the following three components:

- Performance monitoring (internal monitoring) by External Social and Resettlement Specialist, on behalf of NAT and reviewed by the External Independent Monitoring Consultant;
- Impact monitoring (external monitoring) by the External Independent Monitoring Consultant every 6 months during the implementation process; and
- A completion audit by the RAP Completion Audit Consultant.

The External Independent Monitoring Consultant above will be supported by the External Social and Resettlement Specialist and the CLO to ensure that all grievances and community views are included in the RAP monitoring reports.

The RAP monitoring will be undertaken using the monitoring and evaluation process presented in **Table 12-1**. The monitoring undertaken through this framework will use the 4 monitoring indicators (consisting of input⁸¹, output⁸², process⁸³ and outcome/impact⁸⁴ indicators) listed in **Table 12-2**.

⁸¹ **Input indicators** include the resources in terms of people, equipment and materials that go into the RAP. Examples, of input indicators in the RAP include:

- A) The sources and amounts of funding for various RAP activities.
- B) The establishment of the land acquisition team.

⁸² **Output indicators** include activities and services produced with inputs. Examples of output indicators in a RAP can be a database of land acquisition, and the completion of payments made for the loss of assets.

⁸³ **Process indicators** present the changes that occur during and after the RAP implementation and the extent of activities and services that are provided. An example would be the ongoing implementation of grievance mechanism, public consultation and continued awareness raising for the Project.

⁸⁴ **Outcome/impact indicators** cover the delivery of mitigation activities and the measures taken to compensate physical and economic displacement triggered by the Project, such as livelihood restoration and compensation of overall income levels, the changes in PAPs and community attitudes towards the Project, and the use of compensation payments for income generating activities. These indicators will also define the change in long-term measurable results, e.g. in behaviour and attitudes, living standards, and conditions. These outcome/impact indicators may be subject to change by the Independent External Monitoring Consultant. The External Independent Monitoring Consultant carrying out the completion audit will use these outcome/impact indicators, to assess whether restoration activities of the RAP are effective in maintaining and improving the social and economic condition of PAPs.

Table 12-1: Monitoring and Evaluation Framework

Monitoring and Evaluation Activity	Type of Information/Data Collection Methods	Source of Information/Data Collection Methods	Responsibility for Data Collection Analysis and Reporting	Frequency
Performance Monitoring (Internal Monitoring)	Measurement of monitoring indicators against the proposed timeframes, including ongoing procurement of in-kind compensation and other allowances (as detailed in Chapter 13: Implementation Schedule and Budget).	Quarterly (every 3 months) summary reports on progress against monitoring indicators in Table 12-2 .	External Social and Resettlement Specialist with the support of CLO	Quarterly reports will be submitted to Lenders.
Impact Monitoring (External Monitoring)	Tracking effectiveness of process and outcomes using the monitoring indicators in Table 12-2 . Feedback on PAP satisfaction with the RAP.	6 monthly quantitative and qualitative surveys. Review of internal monitoring records. Community meetings focus groups and workshops and other consultation with PAPs (as detailed in the SEP). In addition to, reviews of grievance mechanism and stakeholder consultations (as detailed in the SEP).	External Independent Monitoring Consultant with the support of External Social and Resettlement Specialist and CLO	6 monthly reporting to Lenders.
RAP Completion Audit	Measurement of all monitoring indicators with an emphasis on the monitoring indicators in Table 12-2 .	External independent assessment/sign-off report on completion (forecasted 06/2025 based on performance and impact monitoring reports, independent surveys and consultation with affected persons).	RAP Completion Audit Consultant, with the support of External Social and Resettlement Specialist and CLO	On completion of RAP timetable (forecasted 06/2025) as agreed between PMU and Lenders.

12.2.1 Monitoring Indicators

Table 12-2 below presents the 4 monitoring indicators to be reported against by the External Social and Resettlement Specialist and the External Independent Monitoring Consultant. NAT will provide the External Independent Monitoring Consultant with the baseline data from the household surveys in order to measure these indicators against the baseline for internal monitoring purposes on behalf of NAT.

Gender disaggregated data will be gathered for each indicator, where possible, in order to evaluate the specific impact of the RAP on women.

Table 12-2: Monitoring Indicators

Indicator	Measure	Frequency of Monitoring / Reporting
1) Input Indicators		
Overall spending on land acquisition and resettlement (including a breakdown of costs).	Cash compensation.	Quarterly
	Costs of providing livelihood assistance and support, by type of assistance/support.	
	Consultation and engagement costs.	
	Costs of evaluators and surveyors.	
	Costs of External Independent Monitoring Consultant(s).	
	Costs of vehicles, etc.	
	Other costs (and type).	
Total number of PAPs, who will need to be compensated, including owners of private land parcels, tenants of shops kiosks and cafeterias located in stations, station informal vendors and informal mobile vendors within the Project alignment.	The PAPs data has been received through the surveys and asset inventory update (detailed in Chapter 9: Entitlements and Compensation). Updates will be made continually as the External Social and Resettlement Specialist progresses the identification and compensation of all PAPs. Provide gender disaggregated data if possible.	Quarterly
Number of formal and informal businesses that must be relocated.	Data on affected businesses has been received through the surveys and asset inventory update (detailed in Chapter 9: Entitlements and Compensation). Provide gender disaggregated data if possible. Updates will be made continually as the External Social and Resettlement Specialist progress the identification and compensation of all formal/informal businesses that have been relocated by the Project.	Quarterly
2) Output Indicators		

Indicator	Measure	Frequency of Monitoring / Reporting
Number (and percentage) of PAPs who signed compensation agreements. (Cases of negotiated settlements)	The percentage should be calculated from the total number of PAPs who signed compensation agreements. Provide gender disaggregated data if possible.	Quarterly
Number (and percentage) of urban commercial land, structures and commercial buildings for which compensation agreements were signed.	The percentage should be calculated from the total number of negotiated urban commercial land parcels structures and commercial buildings, as identified by the surveys and asset inventory update (detailed in Chapter 9: Entitlements and Compensation).	Quarterly
Number (and percentage) of PAPs who refused to sign compensation agreements/are still deciding.	The percentage should be calculated from the total number of PAPs provided with compensation agreements. If possible, a breakdown of reasons why compensation agreements have been refused (or still have not been accepted) should be provided, with separate data on those that have not been negotiated and those that have been unattended. Provide gender disaggregated data if possible.	Quarterly
Number (and percentage) of PAPs who have appealed to court.	The percentage should be calculated from the total number of PAPs who have opened court cases for the compensation of lost assets. If possible, a breakdown of reasons why compensation agreements have been refused (or still have not been accepted) should be provided, with gender disaggregated data if possible.	Quarterly
Number (and percentage) of compensation agreements executed (compensation paid in full).	The percentage should be calculated from the total number of PAPs provided with compensation agreements. With separate reporting of compensation in accordance with national legislation and compensation in accordance with Lender’s requirements.	Quarterly
Number (and percentage) of businesses that have been relocated.	The percentage should be calculated from the number of businesses which were identified as having to be relocated.	Quarterly
Number of PAPs assisted by the PMU by type of assistance and by category (owners/users and by gender).	Assistance to prepare new ownership/tenancy documents (monetary assistance, provision of information, legal aid etc.).	Quarterly
	Assistance for legal costs.	
	Assistance to move or payment of moving costs.	

Indicator	Measure	Frequency of Monitoring / Reporting
	Assistance provided through the livelihood restoration programme (as detailed in Chapter 11: Livelihood Restoration Plan).	
3) Process Indicators		
Number of PMU external consultants dedicated to the implementation of this RAP.	Members of the PMU (PMU E&S Manager, External Social and Resettlement Specialist, CLO).	Quarterly
	Members of other NAT and governorate departments.	
	Skill trainers and other supporting specialists included in Chapter 11: Livelihood Restoration Plan .	
	Training activities completed as detailed in Chapter 11: Livelihood Restoration Plan .	
	External Independent Monitoring Consultant.	
	RAP Completion Audit Consultant.	
Number of newly received, open and closed grievances; any trends in grievances received; and average time for grievance processing.	Measure the time interval between grievance registration and closure as summarised below. <ul style="list-style-type: none"> • Immediate grievance registration; • CLO contact complainant within 2 working days following complainant registration to explain the Project response process to the grievance; • 10 working days for CLO to investigate and respond to complainant (informing them of the proposed corrective measure); and • Implementation of the corrective measure and its follow up have to be communicated to the complainant and recorded in the grievance register. Grievances should be reviewed in accordance with the process detailed in the SEP .	Quarterly
	Number of PAPs using the Grievance Mechanism (disaggregated by channel, gender, age).	
	Number of cases resolved at Project-level (disaggregated by gender).	
	Number of unresolved cases at Project level (disaggregated by gender).	

Indicator	Measure	Frequency of Monitoring / Reporting
	Timeframe for responding to and resolving grievances (disaggregated by gender).	
	Number of cases referred to court and subjects of court cases (disaggregated by gender).	
Engagement activities.	Number of community meetings undertaken.	Quarterly
	Percentage of women participating in community meetings.	
	Number of focus groups and workshops targeting vulnerable groups including women.	
Budget and timeframes.	Budget and timings of achieved activities against the agreed RAP implementation schedule.	Quarterly
	Total funds disbursement against the RAP budget presented in Chapter 13: Implementation Schedule and Budget.	
4) Outcome/Impact Indicators		
Average time for payment of compensation.	Average time between acceptance of the offer/signing of the compensation agreements and the execution of compensation. This should also be internally monitored by the PMU Social Specialist to determine if there are delays which could put PAPs in a difficult position.	Every 6 months (external monitoring)
How was the received cash compensation used/invested?	Survey to determine what affected people used compensation for, such as: replacement land, replacement structures, commercial buildings, other assets or investments, and not invested for anything.	Every 6 months (external monitoring)
Has compensation been paid at full replacement cost?	Investigate whether recipients of cash compensation who bought replacement land, replacement non-residential buildings and secondary structures (business and facilities) were able to purchase a similar (or better) property.	Every 6 months (external monitoring)
Re-establishment of incomes/livelihoods.	Assess whether those who were using land as a source of livelihood/income managed to re-establish this source and the same level of livelihood/income. Provide disaggregated data by gender.	Every 6 months (external monitoring)
	Assess whether informal users of land have re-established their previous level of income and if any increase income and living standards are observed. Provide disaggregated data by gender.	

Indicator	Measure	Frequency of Monitoring / Reporting
	Calculate the number of PAPs that benefited from the Livelihood Restoration Plan (disaggregated by gender).	
	Number and type of vocational training courses delivered and number of PAPs (disaggregated by gender) who attended to evaluate the progress in implementing the livelihood restoration plan.	
	Percentage of displaced persons (disaggregated by gender) who improved their income and standard of living using indicators such as income, employment opportunities, costs of goods and services, poverty, life expectancy, inflation rate and the number of paid holidays people receive each year.	
	Assess vulnerability segregated data on livelihood re-establishment.	
Re-establishment of businesses.	Assess whether relocated businesses have been successfully re-established. Survey of net income and comparison to baseline data as presented in Chapter 6: Affected People and Assets .	Every 6 months (external monitoring)
	Assess whether business employees are still working after re-location. (If not, establish reasons why).	
	Survey of employees and their earnings and comparison with baseline data.	
Social stability.	Identify whether the Project has caused significant access issues for PAPs.	Every 6 months (external monitoring)
Health	Identify whether the Project caused health problems (physical and/or mental health issues) in nearby communities. This can be measured with submission of grievances and complaints through the grievance mechanism.	Every 6 months (external monitoring)
	Identify whether the resettlement process aggravated health concerns of PAPs.	
Rehabilitation of infrastructure, public facilities and access.	Identify whether those living close to the Project are able to efficiently cross the alignment to access community services (such as schools, hospitals, etc).	Every 6 months (external monitoring)
Level of satisfaction of PAPs.	Identify how satisfied displaced businesses (formal and informal) have been with the resettlement. Provide disaggregated data by gender.	Every 6 months (external monitoring)

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Indicator	Measure	Frequency of Monitoring / Reporting
	Identify how satisfied landowners have been with the resettlement. Provide disaggregated data by gender.	
	Identify how satisfied land users (formal and informal users) have been with the resettlement. Provide disaggregated data by gender.	
	Identify how satisfied nearby communities have been with the Project's environmental, health, safety and social measures. Provide disaggregated data by gender.	

12.3 Monitoring

The internal monitoring process will be carried out through:

- **Database Monitoring** – All socio-economic information on each PAP and the list of their affected assets will be stored in a database that will be the responsibility of the External Social and Resettlement Specialist, with support from the PMU Social Specialist to maintain. In addition, the database will also include the information on the boundaries of each affected land parcel available in the Geographic Information System (GIS) format.
- **Follow-up Activities** – The follow up on the implementation of this RAP will ensure that the activities are implemented within the dates specified in **Chapter 13: Implementation Schedule and Budget**. This process will also help to modify and re-schedule activities where appropriate, to ensure that the RAP implementation is completed on time and as planned.

12.3.1 Internal Monitoring

Objectives

- To monitor and report on the land acquisition process which will affect other Project activities;
- To measure and report progress against the RAP schedule;
- To verify that agreed entitlements are delivered in full to affected people;
- To identify any problems, issues or cases of hardship resulting from physical and economic displacement, and to develop appropriate corrective actions, or where problems are systemic refer them to the NAT Senior Management Team;
- To monitor the effectiveness of the grievance mechanism (detailed in the **SEP**); and
- To periodically measure the satisfaction of PAPs.

Activities

- Liaison with the PMU, Contractor and PAPs to review and report progress against this RAP;
- Verification that compensation entitlements are being delivered in accordance with the RAP;
- Verification that agreed measures to restore or enhance livelihood are being implemented;
- Assessment of PAPs satisfaction with resettlement outcomes through socio-economic survey;
- Monitoring of the Grievance Mechanism in accordance with the **SEP**; and
- Preparation of quarterly summary reports on progress for each of the monitoring indicators and compensation disbursement updates/reports for NAT Senior Management and Lenders.

Implementation

It is intended that most of these activities will be carried out every 3 months (quarterly) by the PMU External Social and Resettlement Specialist, with the External Independent Monitoring Consultant reviewing the reports during their 6-monthly visits, however some local consultants/NGOs may be required for support. The CLO will lead regular consultation with local communities through face to face meetings and small focus groups.

Additional External Social and Resettlement Specialist tasks for internal monitoring:

- Liaise with other designated officials as necessary within the wider NAT to collate up-to-date information on land acquisition progress such as agreement signing, compensation disbursement, disbursement milestones, land areas under construction, land areas reinstated and the like;
- Liaison with the CLO to gather information about progress, issues/incidents, grievances and issues; and
- Conducting semi-structured interviews and/or hardcopy/online surveys with a cross-section of PAPs to verify receipt of entitlements, review effectiveness of measures, assess satisfaction with outcomes (in accordance with the monitoring indicators shown in **Table 12-2**).

12.3.2 External Monitoring

Objectives

- To assess the effectiveness of the land acquisition process as well as compliance with this RAP;
- To verify that measures to restore or enhance PAPs quality of life and livelihood to pre-Project levels are being implemented satisfactorily and effectively; and
- To assess the extent to which the quality of life and livelihoods of affected communities have been restored using information provided by NAT as well as PAPs.

Activities

- Review grievance records (as detailed in the **SEP**) for evidence of non-compliance or recurrent poor performance in RAP implementation;
- Discussions with the CLO to review progress and identify issues;
- Validate the surveys completed by PMU of affected businesses on a sample basis to gauge the extent to which PAPs standards of livelihood have been restored or enhanced as a result of the Project;
- Assess overall compliance with the RAP requirements and Lender’s requirements; and
- Prepare a summary compliance report for NAT Senior Management and Lenders on the RAP implementation progress, any issues arising and any necessary corrective actions.

Implementation

Every six months:

- The External Independent Monitoring Consultant would initially convene by teleconference, online/hardcopy surveys, or in person and discuss the review agenda;
- Travel to the Project site;
- Spend 3-4 days in the NAT office reviewing quarterly internal monitoring summary reports (including supporting documentation), interviewing the PMU External Social and Resettlement Specialist, CLO and support teams (where relevant) as necessary to assess functioning of monitoring and grievance systems, assess progress against this RAP and identify issues arising;
- Spend 7-10 days on site to conduct interviews with a sample of PAPs, the PMU Social Specialist, External Social and Resettlement Specialist and supporting CLOs; and
- Develop key conclusions and recommendations based upon the relevant monitoring indicators detailed in **Table 12-2** and prepare an external monitoring report.

Additional External Independent Monitoring Consultant tasks for external monitoring:

- Liaison with the External Social and Resettlement Specialist to provide information on RAP implementation, progress and monitoring;
- Liaison with the CLO to gather information about progress, issues/incidents, grievances and issues; and
- Conducting semi-structured interviews and/or hardcopy/online surveys with a cross-section of PAPs to verify receipt of entitlements, review effectiveness of measures, assess satisfaction with outcomes (in accordance with the monitoring indicators shown in **Table 12-2**).

12.4 Completion Audit

Objectives

A key objective of the RAP is that resettlement actions and mitigatory measures should lead to sustainable restoration or enhancement of PAPs pre-Project living standards and income levels. At such time as PAPs quality of life and livelihood can be demonstrated to have been sustainably restored to pre-Project levels, the resettlement process can be deemed “complete”.

Resettlement planning for the Project assumes that livelihood restoration of affected landowners will be completely restored through replacement land or other measures, community and social investment programs are well established.

Activities

- Confirm that cash compensation for land and other affected assets have been paid in full;
- Confirm living standards of the affected population have been properly conceived, executed and restored;
- Verify that the physical inputs committed to in the RAP have been delivered and all livelihood restoration measures have been provided;
- Outline the corrective actions taken and assess whether a timely and solution-oriented manner was adopted;
- Assess the inclusion of vulnerable groups and informal users during RAP implementation;
- Measure the socio-economic status of the affected population against the baseline conditions of the population according to the monitoring indicators identified in this RAP and, if any modifications were required during RAP implementation;
- Assess the performance of the grievance mechanism in timely resolution of complaints raised and approach to Project consultation;

Implementation

After finalisation of RAP implementation activities (anticipated 06/2025):

- The RAP Completion Audit Consultant would initially carry out a desk review by evaluating RAP internal and external monitoring reports in addition to other supportive documents and records developed during RAP implementation;
- Travel to the Project site;
- Spend 3-4 days in the NAT office interviewing the External Social and Resettlement Specialist, PMU Social Specialist, CLO and support teams (where relevant) as necessary to assess functioning of monitoring and grievance systems, assess progress against this RAP and identify issues arising;

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- Spend 7-10 days on site to conduct interviews with a sample of PAPs; and
- Assess whether the RAP implementation leads to sustainable restoration or enhancement of PAPs pre-Project living standards and income levels and prepare a completion audit report.

12.5 Reporting Requirements

The RAP reporting requirements are summarised in **Table 12-3** below.

Table 12-3: RAP Reporting Requirements

Report Type	Frequency	Prepared By	Reviewed By (and issued to)	Comments
Internal RAP Monitoring Report	Quarterly	External Social and Resettlement Specialist	PMU Social Specialist and NAT Senior Management (Issued to Lenders)	10–15-page report (plus supporting documentation) summarising progress against the RAP; outline of any issues and agreed related actions; summary schedule of grievance status; minutes of any stakeholder or affected people consultations or meetings.
External RAP Monitoring Report	Every 6 months	External Independent Monitoring Consultant	External Social and Resettlement Specialist, NAT Senior Management and Lenders Findings to be made available publicly after presentation to the NAT Board. (Issued to Lenders)	25–35-page report (plus supporting documentation) summarising assessment of PAP satisfaction with RAP implementation and Grievance Mechanism process, progress towards livelihood restoration; Lender’s requirements compliance; discussions of any RAP issues of concern; identification of any areas of non-compliance and agreed corrective actions; and summary of resettlement status.
RAP Completion Audit Report and Reviews	Upon completion of construction (1 report in total)	RAP Completion Audit Consultant	External Social and Resettlement Specialist, NAT Senior Management and Lenders. Findings to be made available publicly after presentation to the NAT Board.	RAP Completion Audit to verify PMU has complied with undertakings defined by the RAP and that land acquisition and compensation has been completed in accordance with the Lender’s requirements.

13. IMPLEMENTATION SCHEDULE AND BUDGET

13.1 Implementation Schedule

This RAP is a live public document and will continue to be revised following Project approval to inform the resettlement programme through the various stages of Project development (construction and operation). It will be the responsibility of the PMU External Social and Resettlement Specialist to revise the RAP during construction and the NAT Social Specialist to revise the RAP during operation, if required. This RAP provides a timeline of actions (primarily consisting of RAP implementation and monitoring) between 2022-2025, when the Project will become fully operational.

The RAP will be implemented in a sequential approach; the process of implementing the RAP is a sequential process that will begin with the identification of PAPs, compensation valuation, the consultation and negotiation with PAPs, compensation deposit and grievances. The previous implementation steps represent the main steps that should be taken before civil works take place, conceding that the RAP implementation process is a continuous process that begins before the start of the construction activities and continues throughout the construction period.

Table 13-1 below provides the key dates for the implementation of this RAP, covering all activities from RAP disclosure through to its implementation, monitoring, evaluation and completion. End dates are indicative as certain land parcels may be acquired later in the Project RAP implementation process, for example due to extended negotiations and court proceedings.

Table 13-1: RAP Implementation Timeframes

Item	Responsible Entity	Indicative Start Date	Indicative End Date
RAP Disclosure			
Disclosure of the RAP	NAT	01/2023	02/2023
RAP Implementation (including land acquisition)			
Asset inventory update	NAT	04/2022	06/2022
Identification of PAPs	NAT	05/2022	06/2022
Announcing RAP eligibility and entitlements to PAPs	NAT	09/2022	02/2023
Evaluation of individual PAP eligibility and entitlements	NAT	10/2022	01/2023
Preparation of draft contracts, including budget allocation for compensation amounts delivered through national legislation and the RAP Fund	NAT	01/2023	02/2023
Negotiations with PAPs (in person or virtually) and draft contracts issued to PAPs	NAT	01/2023	03/2023

Item	Responsible Entity	Indicative Start Date	Indicative End Date
Court proceedings (in the case of no agreement on the issued contracts)	NAT	01/2023	04/2023
PAP contract signing	NAT	02/2023	03/2023
Mobilisation of Construction Contractor	NAT Construction Contractor	04/2023	10/2023
Disbursement of compensation to PAPs under national legislation and landowners/users from RAP Fund ⁸⁵	NAT	01/2023	2026
Signing land entry protocols for land that will be temporarily transferred to the Construction Contractor ⁸⁶	NAT Construction Contractor	03/2023	2026
Deadline for handing over of the Project affected land and other assets (such as trees and structures) to the Contractor (excluding ongoing court cases)	NAT	04/2023	05/2023
Commencement of construction works	NAT Construction Contractor	05/2023	2026
Continuation of RAP implementation	NAT	04/2023	06/2026
Signing land exit protocols for land that will be transferred back to the landowner on completion of construction, if required ⁸⁷		05/2023	2026

⁸⁵ PAPs will be compensated in accordance with national legislation and/or from the RAP Fund where appropriate. Refer to **Chapter 9: Entitlements and Compensation** for further details.

⁸⁶ A Land Entry Protocol for each affected land parcel that will be transferred to the Contractor needs to be signed at least 3 days prior to physically entering the land parcel. The Land Entry Protocol shall be signed between the landowner/land user of the land parcel and the representative of the Contractor, being witnessed by the local ASD for the lands listed in the Ministerial Decree, ENR for stations and the alignment corridor. The Contractor will not enter any land parcels that have not been delivered to the Contractor through a Land Entry Protocol or for which they have established rights through a rental agreement with the relevant landowner.

⁸⁷ A Land Exit Protocol needs to be completed for land that is temporarily acquired and will be handed back to the original owner by the Contractor. The land will be fully reinstated to its prior condition or better by the Contractor before handover.

Item	Responsible Entity	Indicative Start Date	Indicative End Date
Monitoring and Evaluation			
Internal RAP performance monitoring by the PMU External Social and Resettlement Specialist, with reviews from the External Independent Monitoring Consultant	NAT Internal Monitoring Team	01/2023	06/2026
External RAP impact monitoring by the External Independent Monitoring Consultant (every 6 months)	External Independent Monitoring Consultant	06/2023	06/2026
Stakeholder Engagement			
Establish and implement the grievance mechanism (as detailed in the project Stakeholder Engagement Plan (SEP)).	NAT	10/2022	06/2025
Consultation meetings with PAPs (monthly during RAP implementation).	NAT	01/2023	06/2025
Negotiations with landowners and users (formal and informal) to agree entitlements and compensation amounts.	NAT	01/2022	06/2025
Ongoing engagement with PAPs, including vulnerable people, as part of the delivery of the Livelihood Restoration Plan (Chapter 11) and the SEP .	NAT	09/2022	06/2025
Post RAP Completion			
Continued operation of grievance mechanism during construction (as detailed in the SEP).	NAT	02/2023	06/2025
Continued operation of grievance mechanism during operation (as detailed in the SEP).	NAT	06/2025	Ongoing
Completion audit (upon completion of RAP anticipated 2025).	RAP Completion Audit Consultant	07/2025	09/2025

13.2 RAP Budget

13.2.1 Funding Arrangements

This Chapter presents the costs for implementing this RAP. It includes:

- All compensation costs;

- Costs of livelihood measures (inclusive of the livelihood restoration programme described in **Chapter 11: Livelihood Restoration Plan**); and
- Additional assistance allowances (such as legal fees and transportation costs).

It also includes the personnel costs for delivering this RAP, such as fees for the and the External Independent Monitoring Consultant.

The RAP implementation costs included in this Chapter will be financed through two separate funding sources:

- Funds allocated from the Ministry of Finance for implementation of the Law 10/1990 and its amendments in Law 1/2015, Law 24/2018 and Law 187/2020 (national legislation): This source will provide compensation to PAPs in line with Egyptian legislation (see **Chapter 3: Legislative Framework**). Compensation provided through national legislation will be disbursed by the ASD.
- RAP Fund: A separate RAP Fund will be established by NAT to ensure cash and in-kind compensation meets full replacement values in accordance with Lender’s requirements. Compensation provided through this RAP Fund will be disbursed by NAT.

The compensation (including livelihood restoration measures) to be provided to each PAP from both funding sources will be clearly presented in the contracts signed by NAT and each PAP. Compensation amounts paid under national law and the RAP Fund will be under separate contracts.

Payment of the compensation through national legislation to landowners and additional compensation provided through the RAP Fund to land users (both formal and informal) will be paid within 45 days of title deed transaction.

The full amounts of both allocated compensation amounts will be provided to a PAP before land is either permanently acquired and / or Land Entry Protocols are signed to access land temporarily. Only after delivery of this cash or in-kind compensation to the PAP, will the land be transferred to and accessible by, the Contractor. However, please note that some compensation may continue to be provided after the PAP vacates the expropriated land (e.g. through implementation of the specific livelihood restoration packages).

The below tables present the budget breakdown of all land acquisition and resettlement related costs for the project that will be covered in the above-mentioned two separate funding sources. If any of the costs mentioned in the below table exceed the anticipated amounts and cannot be covered within the contingency allocation, NAT commits to meeting any additional cost should it arise through the allocation of an additional budget.

13.2.2 Budget Methodology

The compensation amounts described in this Chapter are based on the valuation methodologies presented in **Chapter 9: Entitlements and Compensation**. The total amounts are then calculated using the PAP data obtained during the asset inventory update and the socio-economic surveys.

The costs have been separated into the following categories:

- Compensation for land where in-kind replacement land is not feasible;
- Compensation for non-residential buildings and secondary structures;
- Compensation for income losses (business);

- Compensation for income losses (employees);
- Compensation for trees;
- Livelihood restoration programme costs; and
- Additional assistance allowances.

The compensation amounts presented for each of these categories represents totals that can be used for both cash compensation and in-kind compensation, as described in **Chapter 9: Entitlements and Compensation**. Exact figures cannot be provided for a number of categories (such as the livelihood restoration programme) as they will be mutually agreed between the PAPs and NAT through negotiations and specific choice of livelihood restoration activities – see **Chapter 4: Land Acquisition Process and Principles**. In these cases, estimations and methodologies for these amounts have been provided, alongside a contingency included in the RAP Fund.

13.2.3 Estimated Compensation Costs

The anticipated compensation costs for each cost category, including the funding source, are presented as follows:

- Table 13-2: Compensation Costs for Land (where in-kind replacement is not feasible);
- Table 13-3: Compensation for Income Losses (Business);
- Table 13-4: Compensation for Income Losses (Employees);
- Table 13-5: Compensation for Trees;
- Table 13-6: Livelihood Restoration Plan; and
- Table 13-7: Additional Assistance Allowances.

Table 13-2: Compensation Costs for Land (where in-kind replacement is not feasible)

Land Type ⁸⁸	Land Category	Number of Land Parcels	Total Area (m ²)	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Non-agricultural Land ⁸⁹	Sporting station land	1	788	41,910,750	-	41,910,750
	Bab Sharq station land	1	632	6,825,600	-	6,825,600
Vacant Land	Depot land	1	204,000	1,310,000,000	-	1,310,000,000
TOTAL		3	205,420	1,358,736,350	-	1,358,736,350

⁸⁸ Compensation for the land in Egypt is estimated by ASD and includes compensation for the buildings / structures located on these land parcels.

⁸⁹ Values of individual non-agricultural land parcels are determined on a case-by-case basis. The figure provided is the total compensation for all types of affected private residential housing land, affected private industrial land (including those currently in use and not in use).

Table 13-3: Compensation for Income Losses (Business)

Compensation for Income Losses - Business	Number of Businesses	Average Monthly Income (EGP)	Approximate Period of Income Loss	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Permanent Loss of Income for Business at Existing Location (Shop, kiosk, cafeteria inside stations)	8	4,000	6 months ⁹⁰	-	192,000	192,000
Permanent Loss of livelihoods for informal vendors⁹¹	21	2,400	6 months	-	302,400	302,400
TOTAL	29	2400 - 4000	6 months	-	494,400	494,400

⁹⁰ Depending on the duration of a business' transition following relocation, the proposed up to 6 month's net income cash compensation could be reduced to cover only the period required for the re-establishment of the business and restoration of livelihoods. However, should this be the case, this decision must be based on an assessment for each business owner carried out by a Social Officer prior to the decision, documented and fully agreed with the business owner.

⁹¹ The current project design and construction activities do not anticipate any temporary loss of income for businesses. A budget cannot be estimated by NAT at this time. However, in the event of a temporary loss of income, the PAP will be compensated according to the income lost as a result of the Project. The one who caused the impact will compensate the PAP, i.e. if the EPC contractor causes the impact, they will compensate the PAP under the supervision of NAT. If the project design requires temporary loss of income for business, NAT will cover the compensation.

Table 13-4: Compensation for Income Losses (Employees)

Compensation for Income Losses - Employees	Number of Employees	Average Monthly Income (EGP)	Approximate Period of Income Loss	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Permanent Loss of Income for Employees ⁹²	4	2,000	3 months	-	24,000	24,000
TOTAL	4	2,000	3 months	-	24,000	24,000

⁹² This number has been added based on the results of the socio-economic survey (**Chapter 6**). According to the results of the socio-economic survey and FGDs with the shops tenants, the employees of the shops are not fixed, and they change from time to time. The current project design and construction activities do not anticipate any temporary loss of income for businesses for employees. A budget cannot be estimated by NAT at this time. However, in the event of a temporary loss of income, the PAP will be compensated according to the income lost as a result of the Project. The one who caused the impact will compensate the PAP, i.e., if the EPC contractor causes the impact, they will compensate the PAP under the supervision of NAT. If the project design requires temporary loss of income for employees, NAT will cover the compensation as indicated in the entitlements matrix.

The employees will be counted by the Compensation Committee, a maximum of one month before the start of RAP implementation, in order to compensate those who will lose their income as a result of the project. The current project design and construction activities do not anticipate any temporary loss of income for employees.

Table 13-5: Compensation for Trees

Type	Number of Trees	Compensation Cost (Egyptian Pounds)		
		National Legislation	RAP Fund	Total
Palm Trees	5 ⁹³	7,500 ⁹⁴	2,500 ⁹⁵	10,000
TOTAL	5	7,500	2,500	10,000

⁹³ This number has been added based on the results of the RAP team site visit to the depot land. Because the comprehensive ASD report has not yet been issued, the final inventory of the number and types of trees will be based on the ASD report.

⁹⁴ The price of palm trees has been added according to the Alexandria Agriculture Directorate price list (the price of a fruitful palm tree over 5 years old is 1,500 EGP). The compensation for trees will be included in the total value of the land compensation.

⁹⁵ In the event that the palm trees are fruitful and will be planted on another land, the cost of transporting the trees will be added.

Table 13-6: Livelihood Restoration Plan⁹⁶

Category	Livelihood Restoration Measure	Type of Assistance/ Allowance	Compensation Cost (Egyptian Pounds)		
			National Legislation	RAP Fund	Total
Business Premises Tenants of shops located inside stations (Shop, Kiosk, cafeteria) Informal users within the Project alignment (Stationary informal vendors, Informal mobile vendors) Businesses externally adjacent to the Project alignment	Business support for business owner	Business support in access to new markets and advertising, if required, broken down as follows: <ul style="list-style-type: none"> • 10,000 EGP for advertising banners; • 40,000 EGP for brochures; and • 50,000 EGP for advertisements in local newspapers. 	-	100,000	100,000
		Technical experts/consultants sector support, if required, by sector specific experts to analyse business activities who will recommend improvements. Budget based on 1 expert (3000 EGP per day × 15 day)	-	45,000	45,000
		Business activity relocation costs for transportation, utilities and decoration (including painting) of replacement shop. These include: <ul style="list-style-type: none"> • 10,000 EGP for transportation; • 25,000 EGP for utilities; and • 30,000 EGP for decoration. 	-	65,000	65,000
		Providing support for the sales of goods that were not sold before relocation or close of business. ⁹⁷	-	20,000	20,000

⁹⁶ Economically displaced persons whose livelihoods or income levels are adversely affected are provided with opportunities to improve, or at least restore, their means of income-earning capacity, production levels and standards of living as per Lender requirements. Thus, this is in addition to compensation paid for lost assets as described in the Entitlements Matrix.

⁹⁷ NAT has advised that this compensation may apply to goods that may be damaged such as vegetables, fruits and foodstuffs. The evacuation process of tenants and shop owners is carried out in coordination with the PAPS themselves, who have a period of one to three months to evacuate the premises, hence 20,000 EGP has been added to cover this compensation if required.

Category	Livelihood Restoration Measure	Type of Assistance/ Allowance	Compensation Cost (Egyptian Pounds)		
			National Legislation	RAP Fund	Total
	Support for employees (including vulnerable groups)	Provide opportunities for vocational skills development in local educational institutions such as the Ministry of Industry (no cost to NAT). ⁹⁸	These costs are covered by the Alexandria Governorate, Ministry of Solidarity and Training Centres affiliated with the Ministry of Industry.		
	Alternative livelihoods – new business development and support	Proactively identify job opportunities for PAPs (including vulnerable groups) and facilitate job placement, including provision of job opportunities during construction with EPC Contractor and during operation with NAT. Follow-up by NAT covered by NAT Human Resources. Support in registering those who are seeking employment, for those who wish to do so.	-	20,000	20,000
	Business formalisation	Assisting informal businesses in their official registrations for those who wish to do so.	-	20,000	20,000
Special Assistance for Vulnerable Groups	Vulnerable PAPs as identified in Table 11-2 .	Providing tools/ devices to assist the disabled PAPs such as wheelchairs, if necessary.	-	50,000	50,000
		Providing assistance in involving all vulnerable group categories in relevant social care programmes provided by the Ministry of Social Solidarity and The National Council for Women.	No cost to NAT.		

⁹⁸ NAT will provide this assistance in coordination with the Alexandria Governorate, Ministry of Solidarity and Training Centres affiliated with the Ministry of Industry. All of these bodies are government entities and as such the vocational skills development assistance will not require an additional cost to be incurred by NAT.

Category	Livelihood Restoration Measure	Type of Assistance/ Allowance	Compensation Cost (Egyptian Pounds)		
			National Legislation	RAP Fund	Total
Miscellaneous ⁹⁹			-	20,000	20,000
TOTAL¹⁰⁰			-	340,000	340,000

⁹⁹ This budget includes any potential costs such as wages of workers (daily workers) during transportation for loading, repairing, installing, etc. The budget has been calculated based on the limited number of PAPs identified from the socio-economic survey. However, should additional budget be required for Livelihood restoration measures under this RAP, the budget will be reallocated from the contingency amount to ensure all eligible impacted groups are covered.

¹⁰⁰ NAT confirmed that any additional matters that arise or additional costs will be covered from the Contingency item included in **Table 13-8**.

Table 13-7: Additional Assistance Allowances

Type of Assistance/ Allowance ¹⁰¹	Compensation Cost (Egyptian Pounds)		
	National Legislation	RAP Fund	Total
Additional Assistance Allowances¹⁰² <ul style="list-style-type: none"> Items and objects that cannot be relocated¹⁰³. legal costs for all transactions relating to the reestablishment of the business in an alternative location as applicable. Reimbursement cost related to damages that may occur during transportation. 	-	50,000	50,000
TOTAL	-	50,000	50,000

13.2.4 Summary of Costs

The total cost estimated for the implementation of this RAP is shown in **Table 13-8**. All compensation costs are due to be dispersed prior to the commencement of construction works¹⁰⁴. A 10% contingency has also been added to the total cost calculated for compensation to ensure that sufficient funding is available, if required, such as for further PAPs that might be identified, or if significant increases to compensation is required.

¹⁰¹ Note that NAT will cover the costs of all legal fees of PAPs, however this cost is not presented in this Chapter.

¹⁰² Any additional matters that arise or additional costs will be covered by NAT from the Contingency item included in Table 13-8

¹⁰³ Such as: electricity connections, air-conditioning connections, utility connections, refurbishment of paintwork that can be damaged in the event of transportation, etc..

¹⁰⁴ This is based on the assumption that there are no lengthy delays during contract negotiations. It may be the case that some individual parcels may be delayed due to court proceedings.

Table 13-8: Summary of Costs¹⁰⁵

Item	Compensation Cost (Egyptian Pounds)		
	National Legislation	RAP Fund	Total
Compensation			
Compensation for Land (where in-kind replacement is not feasible)	1,358,736,350	-	1,358,736,350
Compensation for Income Losses (Business)	-	494,400	494,400
Compensation for Income Losses (Employees)	-	24,000	24,000
Compensation of Trees	7,500	2,500	10,000
Livelihood Restoration Programme Costs	-	340,000	340,000
Other Assistance Allowances	-	50,000	50,000
Contingency¹⁰⁶			
Contingency for acquisition of land <ul style="list-style-type: none"> • 3,389,250 EGP for Sporting station (which is 8% of the land evaluation) • 884,400 EGP for Bab Sharq station (which is 13% of the land evaluation) • 131,000,000 EGP for depot land (which is 10% of the land evaluation) 	135,273,650	-	135,273,650
20% Contingency for the rest of the compensation budget items	-	183,600	183,600
TOTAL¹⁰⁷	1,494,017,500	1,094,500	1,495,112,000

¹⁰⁵ If any of the costs mentioned in this table exceed the anticipated amounts and cannot be covered within the contingency allocation, NAT commits to meeting any additional cost should it arise through the allocation of an additional budget.

¹⁰⁶ The total contingency represents 10% of the total RAP budget.

¹⁰⁷ Using exchange rate of 1 EGP = 0.0411518 USD as of 7 November 2022. Total compensation budget based is USD \$61,526,500 (US\$ 61,481,500 USD based on national legislation and USD \$45,000 provided from the RAP Fund).

13.2.5 Updating Implementation Costs

The costs presented above will change during the implementation of this RAP, as a result of negotiations, any court proceedings, and where PAPs select specific replacement land, structures, livelihood restoration programme activities, and assistance allowances.

Therefore, the costs will be reviewed every quarter and updated where necessary in-line with the reality of the costs being incurred. NAT will monitor the costs throughout the implementation of this RAP.

13.2.6 RAP Management and Administrative Costs

NAT will appoint an External Independent Monitoring Consultant to provide independent analysis of the progress of the RAP implementation against the defined monitoring indicators in **Chapter 12: Monitoring and Reporting**. An overview of the costs for these services is provided in **Table 13-9**.

Table 13-9: RAP Management and Administrative Costs

Item	Total (EGP)
RAP Implementation Team (established for 3 years) as part of PMU	
<p>PMU E&S Manager</p> <p>It is assumed that a quarter of the PMU E&S Manager’s time on the Project will be spent specifically overseeing the implementation of the RAP over the 3 year construction period. The PMU E&S Manager will be appointed internally within NAT and as such their salary will not be paid from the RAP budget.</p> <p>However, the PMU E&S Manager’s per diem, transportation and accommodation costs associated with travelling to Alexandria is accounted for within the RAP budget. This budget is assumed at 1,500 EGP per day over 3 years (assuming 220 working days a year) divided by 4.</p>	247,500
<p>External Social and Resettlement Specialist¹⁰⁸</p> <p>This will be a full-time position externally appointed by NAT and based in Alexandria, if possible. The budget assumes 35,000 EGP per month over 36 months.</p>	1,260,000
<p>Community Liaison Officer (CLO)</p> <p>The CLO will be appointed internally within NAT and as such their salary will not be paid from the RAP budget.</p> <p>However, the CLO’s per diem, transportation and accommodation costs for time spent in Alexandria is accounted for within the RAP budget. This budget assumes</p>	247,500

¹⁰⁸ This fee is the maximum amount of budget allocated for the appointment of an external Social and Resettlement Specialist who will be employed on a full-time basis for the length of the construction period.

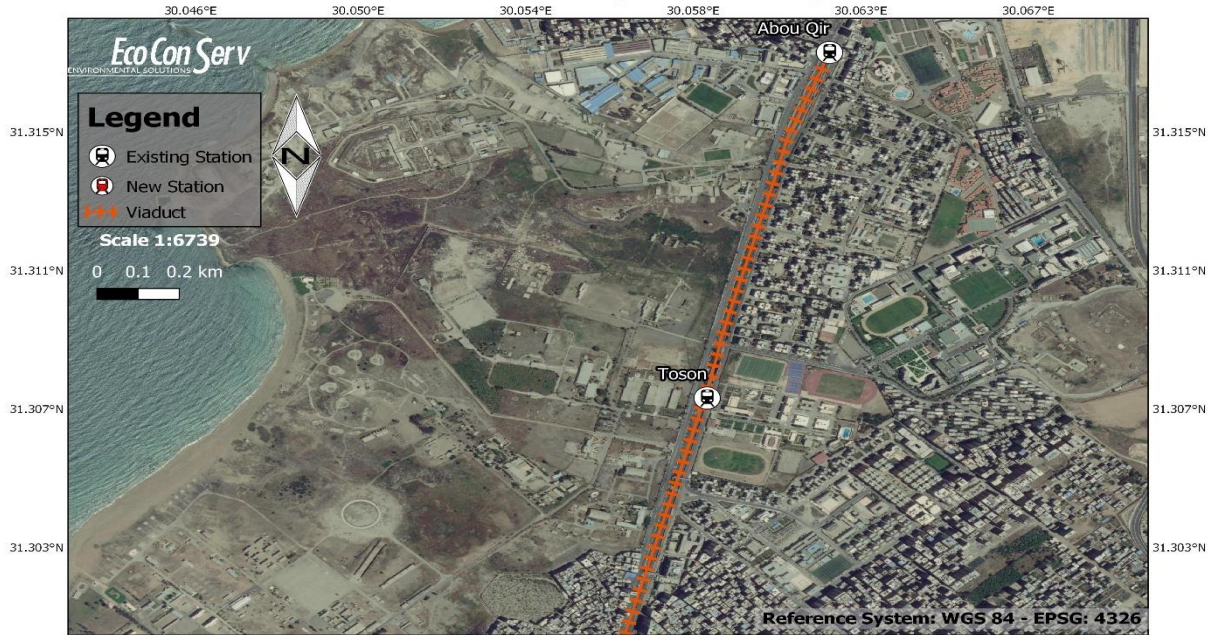
Item	Total (EGP)
that the CLO will be based in Alexandria for 55 days per year to undertake consultation and stakeholder engagement activities specifically related to the RAP at 1,500 EGP per day over 3 years. The CLO will provide further RAP support based in Cairo.	
RAP Miscellaneous Implementation Costs, including consultation, communication, logistics, reporting, etc materials production.	100,000
External Independent Monitoring Consultant	
External Independent Monitoring Consultant It is assumed that the work carried out by the External Independent Monitoring Consultant will involve 3-4 days based at NAT offices and 7-10 days conducting interviews in Alexandria on a 6-monthly basis over the 3 year construction period (assuming a cost of 10,000 EGP per day).	840,000
In addition, a budget of 4,500 EGP has been provided to cover per diem, transportation and accommodation costs for the 10 day monitoring visits that occur every 6 months over the 3 construction period.	270,000
External RAP Completion Audit (using an in-country RAP Specialist) Two budgetary options are presented for undertaking the External RAP Completion Audit for the Project.	
Option 1: Using an in-country senior RAP specialist and a Junior RAP specialist for a period of 20 days each at 10,000 EGP per day and 5,000 EGP per day. Plus, expenses of 70,000 EGP for per diem, transportation and accommodation costs in Alexandria for 10 days.	370,000
Or Option 2: A combined team of international and in-country RAP specialists to complete the RAP Completion Audit (if required by Lenders) for an estimated cost of approximately 2,150,000 EGP.	2,150,000
TOTAL (Maximum Cost)	5,115,000

14. APPENDICES

APPENDIX 1: MAPS OF THE PROJECT ALIGNMENT

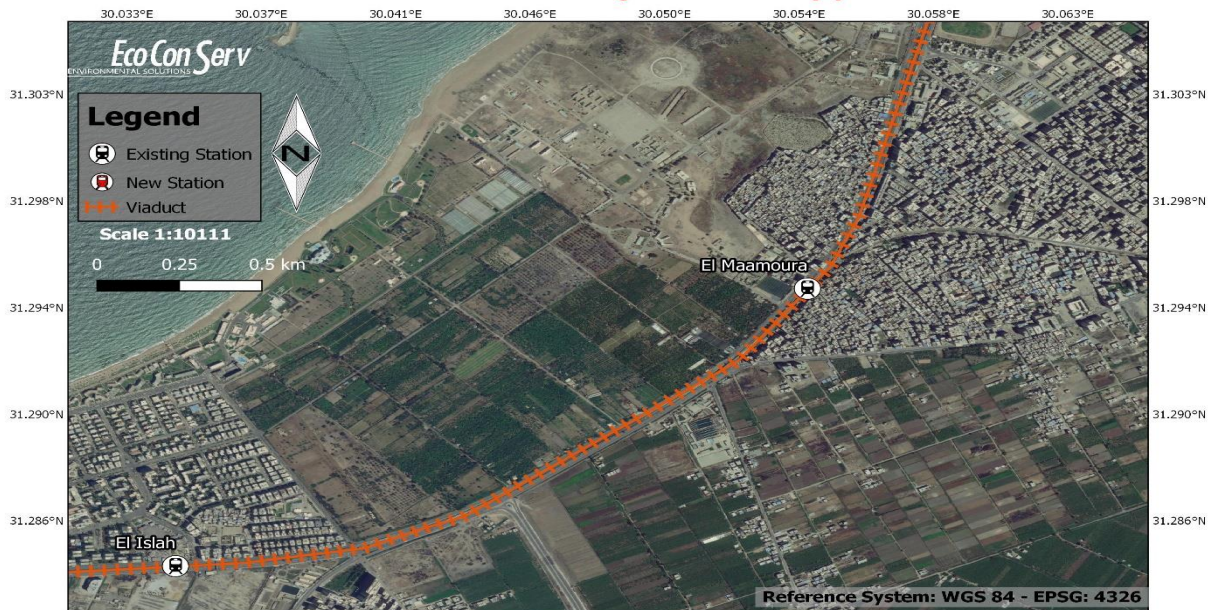
Alexandria Regional Metro - Abou Qir

Section A - Abou Qir to Sidi Bishr (1)



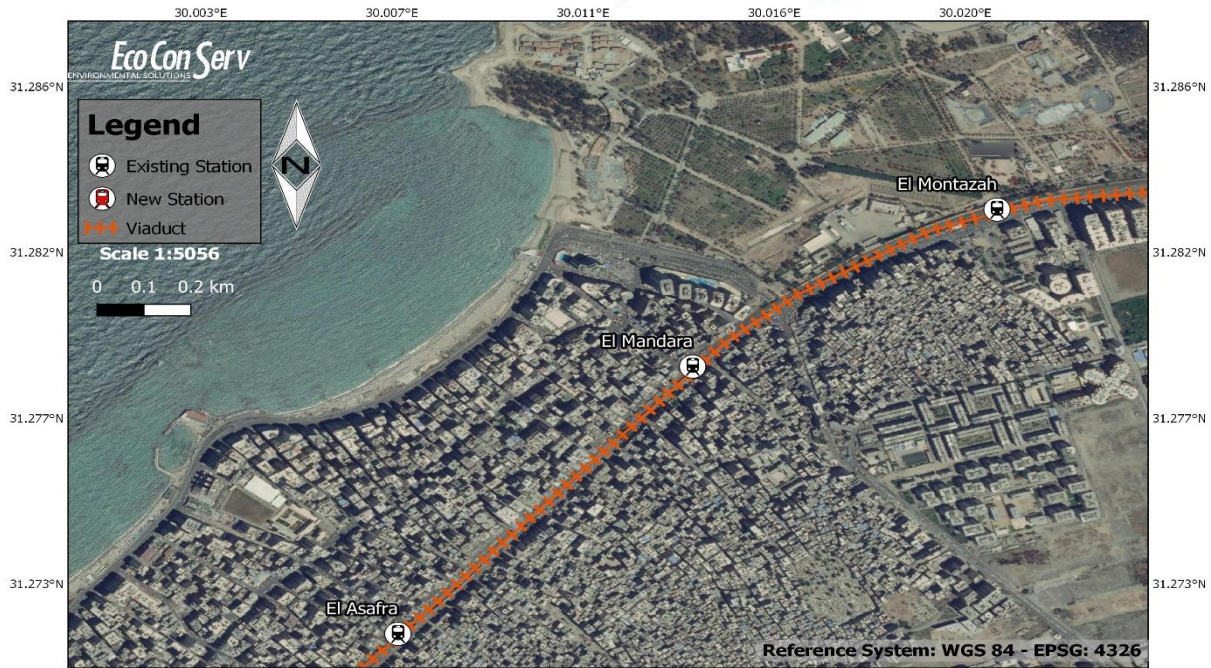
Alexandria Regional Metro - Abou Qir

Section A - Abou Qir to Sidi Bishr (2)



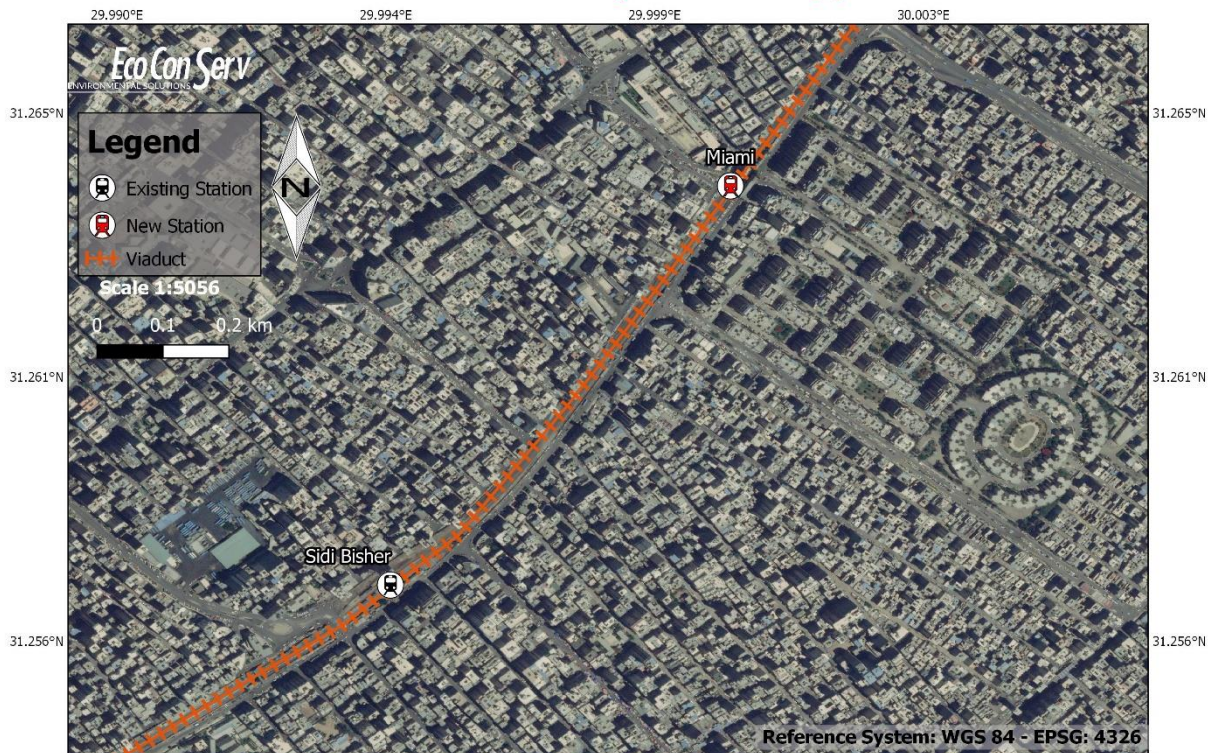
Alexandria Regional Metro - Abou Qir

Section A - Abou Qir to Sidi Bishr (3)



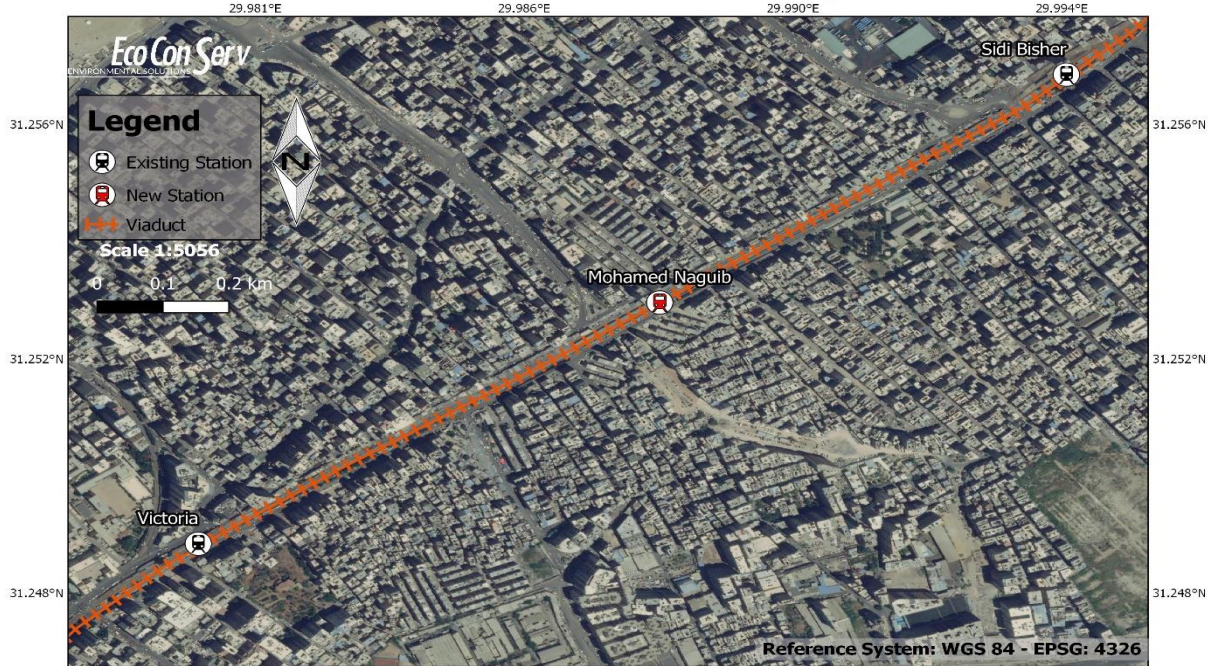
Alexandria Regional Metro - Abou Qir

Section A - Abou Qir to Sidi Bishr (4)



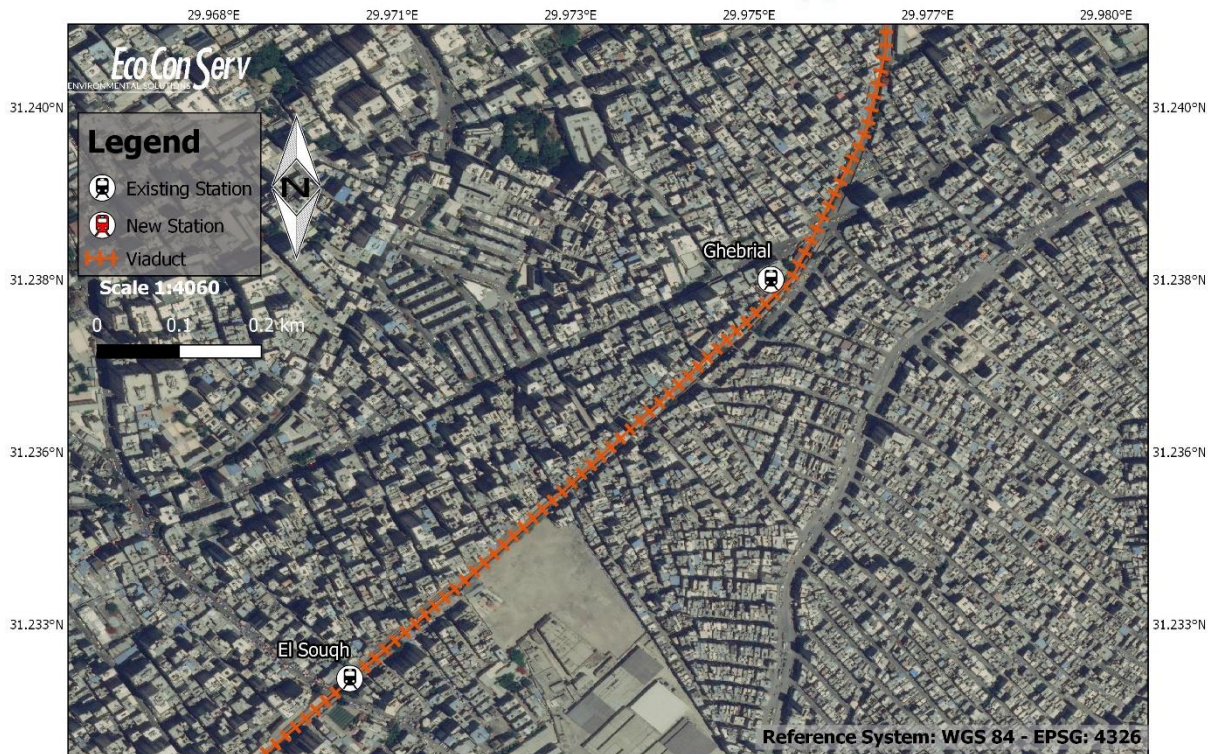
Alexandria Regional Metro - Abou Qir

Section B - Sidi Bishr to Zahiria (1)



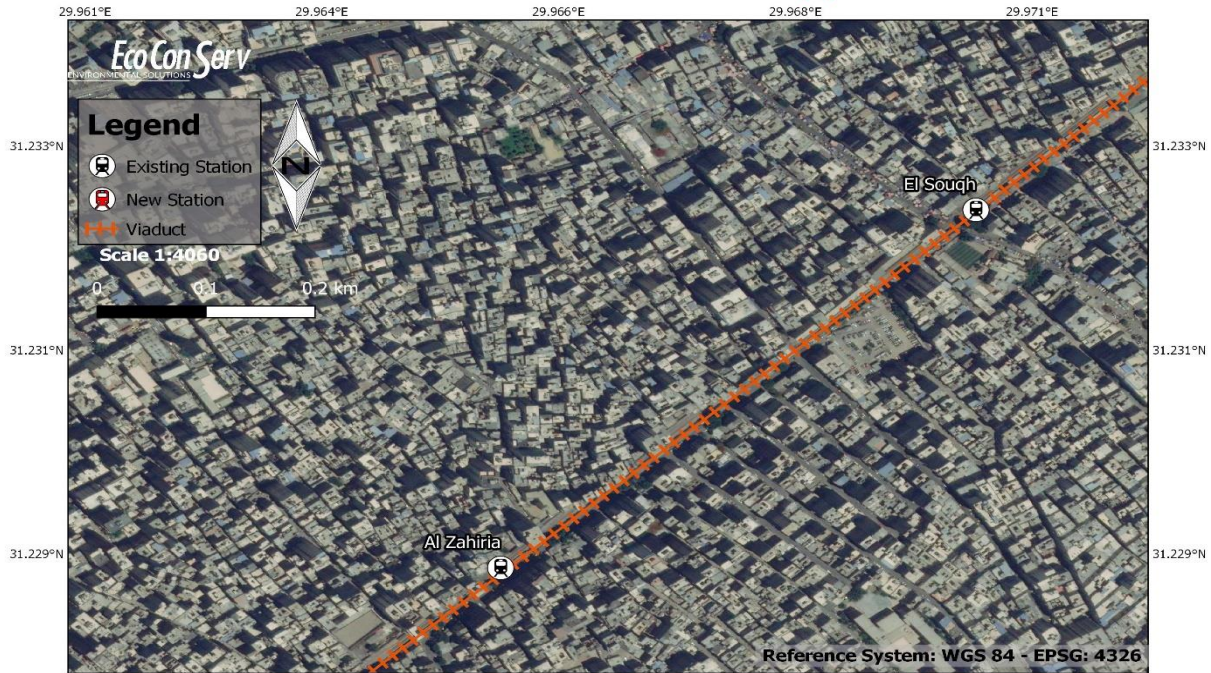
Alexandria Regional Metro - Abou Qir

Section B - Sidi Bishr to Zahiria (2)



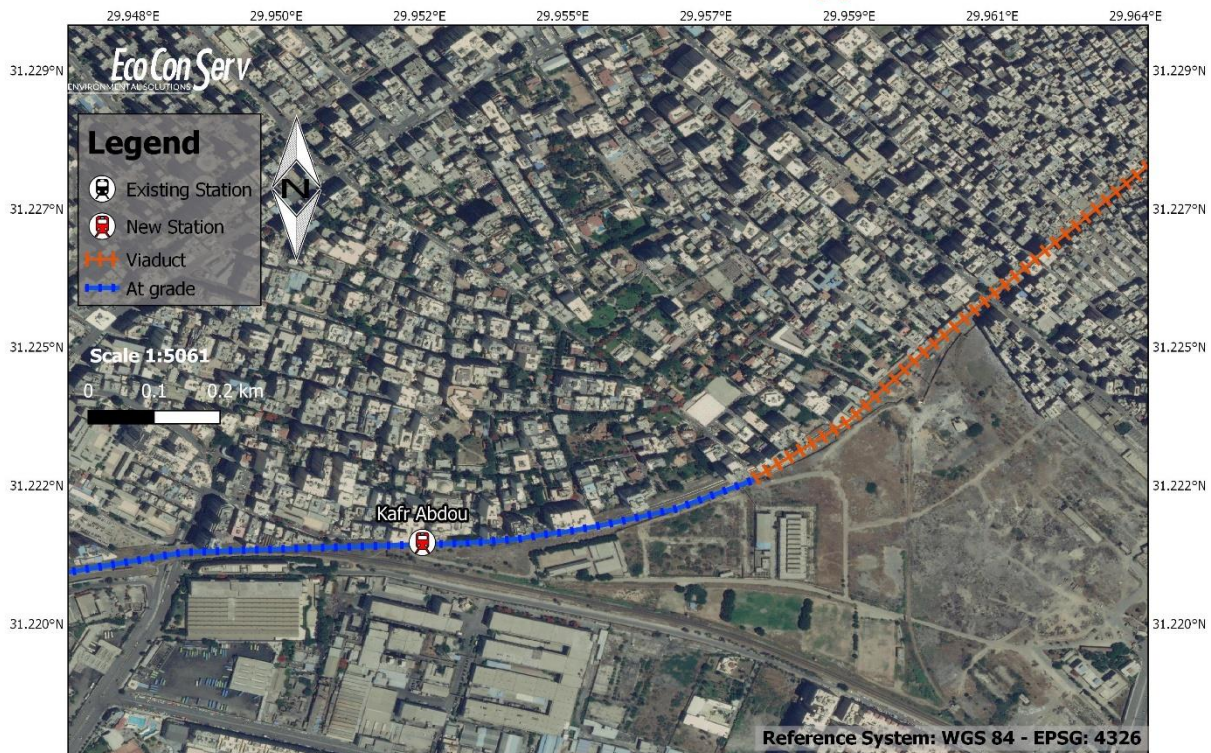
Alexandria Regional Metro - Abou Qir

Section B - Sidi Bishr to Zahiria (3)



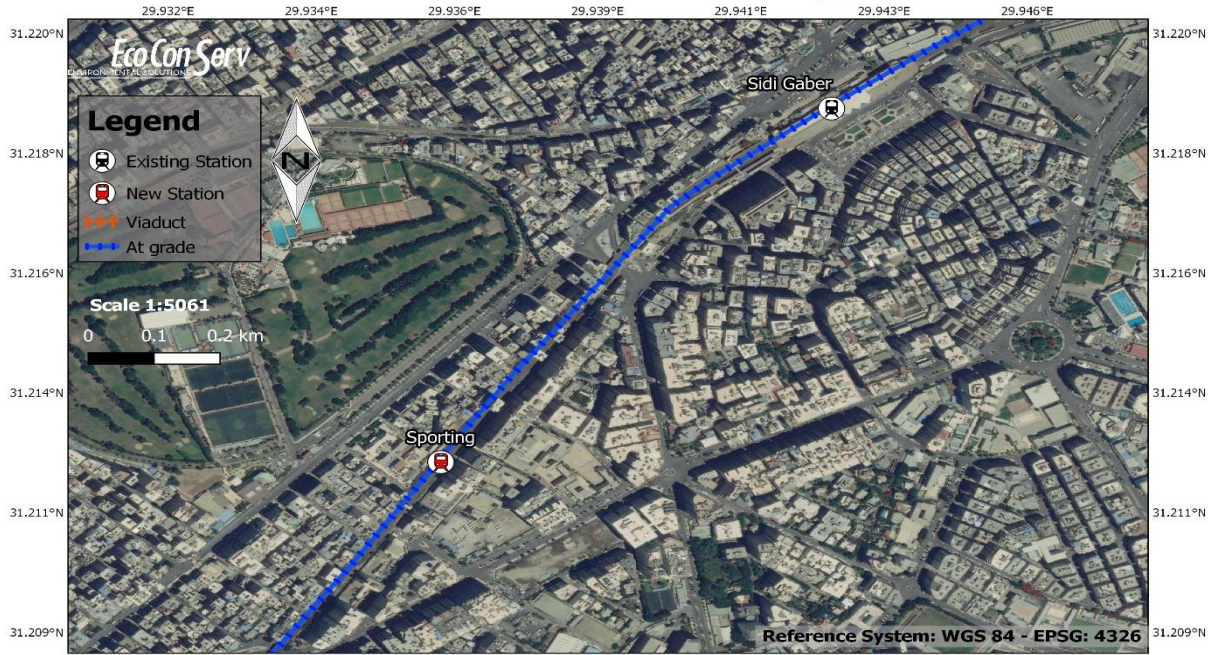
Alexandria Regional Metro - Abou Qir

Section C - Zahiria to Misr Station (1)



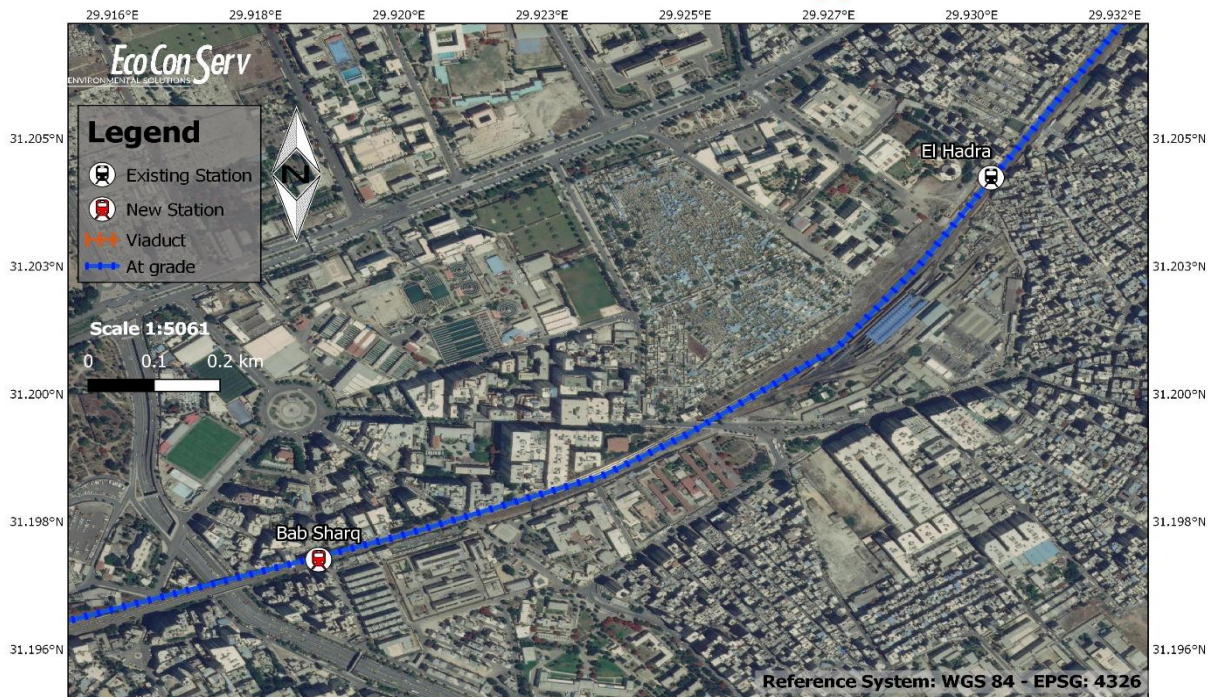
Alexandria Regional Metro - Abou Qir

Section C - Zahiria to Misr Station (2)



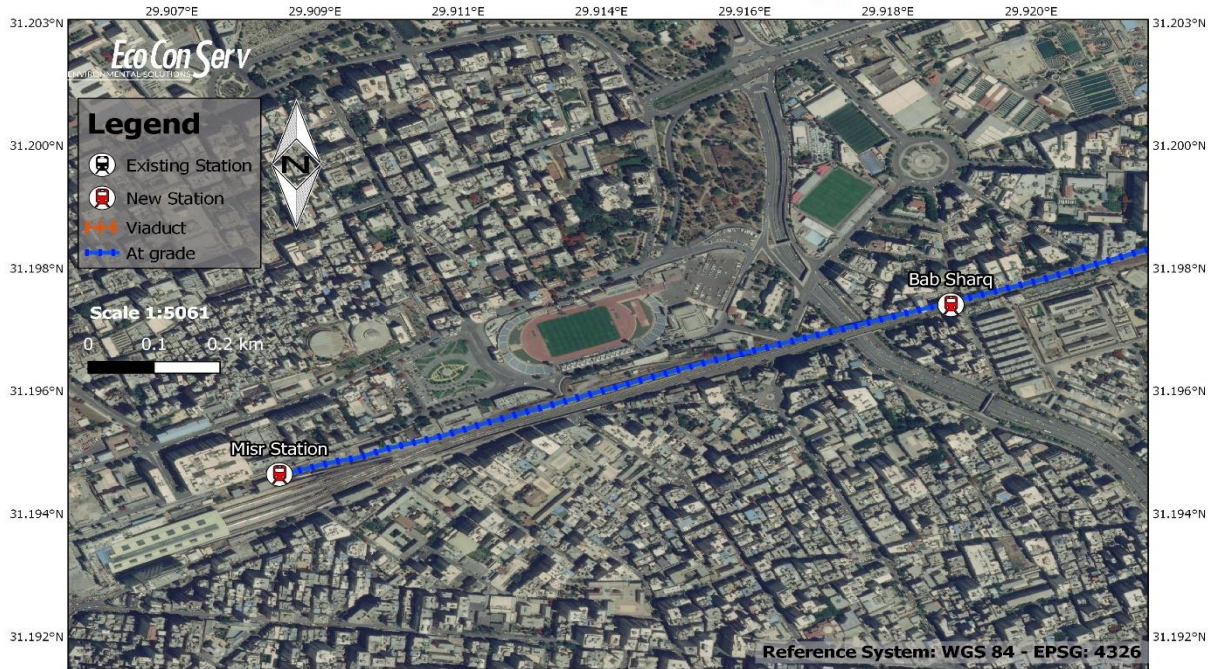
Alexandria Regional Metro - Abou Qir

Section C - Zahiria to Misr Station (3)



Alexandria Regional Metro - Abou Qir

Section C - Zahiria to Misr Station (4)



APPENDIX 2: LAND ACQUISITION MINISTERIAL DECISION

APPENDIX 2A: LAND ACQUISITION MINISTERIAL DECISION



الجزء الرابع السمي

التمن ٤ جنيها

العدد ٤٧ تابع (أ)	الصادر في ٤ ربيع الآخر سنة ١٤٤٢ هـ الموافق (١٩ نوفمبر سنة ٢٠٢٠ م)	المئة الثلاثة والستون
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٢ الجريدة الرسمية - العدد ٤٧ تابع (أ) في ١٩ نوفمبر سنة ٢٠٢٠

قرار رئيس مجلس الوزراء

رقم ٢٣٦٠ لسنة ٢٠٢٠

رئيس مجلس الوزراء

بعد الاطلاع على الدستور ؛

وعلى قانون نظم الإدارة المحلية الصادر بالقانون رقم ٤٣ لسنة ١٩٧٩
ولائحته التنفيذية ؛

وعلى القانون رقم ١٠ لسنة ١٩٩٠ بشأن نزع ملكية العقارات للاستفعة العامة
ولائحته التنفيذية ؛

وعلى قرار رئيس الجمهورية رقم ٢٧٩ لسنة ٢٠١٨ بالتفويض في بعض
الاختصاصات ؛

وبناءً على ما عرضه وزير النقل ؛

قرر :

(المادة الأولى)

يُعتبر من أصل المنفعة العامة مشروع المرحلة الأولى لمетро أبو قير الذي سيتم
تنفيذه في ذات مسار خط سكك حديد أبو قير - الإسكندرية في المسافة من أبو قير شرقاً
حتى محطة مصر بمحافظة الإسكندرية بجميع منشآته ومرافقه من محطات للركاب بما
تحتويه من منشآت لخدمة الجماهير ومحطات القوى الكهربائية والضغط العالي وورشة
للعمرة الجسيمة ووحدة التحكم المركزي وأى منشآت أخرى يحتاجها المشروع ،
وذلك على النحو الموضح بالمذكرة الإيضاحية والخرائط المساحية المرفقة .

(المادة الثانية)

يُستولى بطريق تنفيذ العباثر لصالح الهيئة القومية للإنفاق على الأراضي
والعقارات اللازمة لتنفيذ المشروع المشار إليه في المادة السابقة ، على النحو المبين
بالمذكرة الإيضاحية والخرائط المساحية المرفقة .

الجريدة الرسمية - العدد ٤٧ تابع (أ) في ١٩ نوفمبر سنة ٢٠٢٠ ٣

(المادة الثالثة)

يُنهي تخصيص أراضي وعقارات الجهات الحكومية الموضح بيانها بالمسكرة
الإيضاحية والخرائط المساحية المرفقة ، ويعدل تخصيصها للتفيع العام بدون مقابل
لصالح الهيئة القومية للتأفوق ،

(المادة الرابعة)

ينشر هذا القرار في الجريدة الرسمية ، ويعمل به من اليوم التالي لتاريخ نشره .

صدر برئاسة مجلس الوزراء في ٤ ربيع الآخر سنة ١٤٤٢ هـ

(الموافق ١٩ نوفمبر سنة ٢٠٢٠ م) .

رئيس مجلس الوزراء

دكتور/ مصطفى كمال مديوني

الجريدة الرسمية - العدد ٤٧ تليغ (أ) في ١٩ نوفمبر سنة ٢٠٢٠

وزارة النقل

مذكرة إيضاحية

لقرار رئيس مجلس الوزراء

بشأن إضفاء صفة النفع العام على مشروع المرحلة الأولى لمترو أبو قير
بمحافظة الإسكندرية

لكنت دراسة خصائص النقل بمحافظة الإسكندرية على أن تطوير وسائل النقل العام بالإسكندرية هو الحل الوحيد للمشكلات المرورية، وأوصت الدراسة بتنفيذ مشروع تطوير خط سكة حديد أبو قير - محطة مصر بحيث يتمكن من نقل حجم ركاب يقدر بنحو ٦٠ ألف راكب/ ساعة/ اتجاه .

وفي ضوء تكاليف المترو رئيس الجمهورية بالبدء في تنفيذ مترو الإسكندرية في ذات مسار خط سكة حديد أبو قير - الإسكندرية الحالي وتنفيذ المرحلة الأولى في المسافة من محطة سكة حديد أبو قير حتى محطة مصر بطول ٢١,٧ كيلومتر لتحقيق الأهداف الآتية :

- ١- توفير وسيلة نقل عصرية وسريعة وأمنة وصديقة للبيئة .
 - ٢- مواجهة واستيعاب الطلب المتزايد على حركة النقل بالمناطق التي يستخدمها مترو أبو قير بصفة خاصة وبمحافظة الإسكندرية بصفة عامة .
 - ٣- المساهمة في تقليل الاختناقات المرورية بمحافظة الإسكندرية .
 - ٤- تحسين السرعة الفعلية لقطار أبو قير وتحقيق الانتظام المطلوب لمواعيد الرحلات على طول المسار من خلال تقليل زمن القاطر وزمن الرحلة .
 - ٥- تشغيل الخط باستخدام الطاقة الكهربائية النظيفة والأقل تكلفة لتخفيض مستويات تلوث الهواء والتلوث الضوضائي بالمناطق التي يمر بها المترو .
- ويبدأ مسار المرحلة الأولى من محطة سكة حديد أبو قير شرقاً ثم يمتد إلى محطات طوسون ، المعصرة ، الصلاح ، المنتره ، العنترة ، العصاره ، ميامي ، سيدى بشر ، فيكتوريا ، جوريل ، السوق ، الظاهرية ، مروراً بورشة العمرة الجسيمة بمنطقة مصانع النحاس ثم محطات سيدى جابر ، سيورتج ، الحضرة ، باب شرق وصولاً إلى محطة مصر .

الجريدة الرسمية – العدد ٤٧ تابع (أ) في ١٩ نوفمبر سنة ٢٠٢٠ ٥

وتتضمن أعمال المشروع إنشاء ورشة للعمرة للجسمة ومحطة الضغط العالي ووحدة التحكم المركزي على مساحة ٢٢٧٥٩٧ متر مربع على النحو التالي :

الجزء الأول بمساحة ٢١٧٥٠٠ متر مربع مملوكاً لشركة النحاس المصرية - إحدى شركات قطاع الأعمال التابع للشركة القابضة للصناعات المعدنية - ومطلوب تزج ملكيتها للمنفعة العامة طبقاً لأحكام القانون رقم ١٠ لسنة ١٩٩٠ وتعديلاته .

الجزء الثاني بمساحة ١٠٠٩٧ متر مربع من أملاك الهيئة القومية لسكك حديد مصر مطلوب تعديل تخصيصها بتون مقابل لصالح الهيئة القومية للإنفاق .

ونظراً للطبيعة الخاصة لمشروعات تنفيذ خطوط المترو التي تقتضي تعدد مواقع العمل باعتبارها من المشروعات الطولية فإنه يتعذر حصر جميع مسالك الأراضي والعقارات المتداخلة مع المشروع ومساحة ما يملكه كل منهم وما قد يتطلبه المشروع من أجزاء إضافية إلا بعد صدور القرار بتقرير صفة النفع العام وبدء أعمال اللجان المختصة في الحصر ، ومرفق طيه عدد ١٣ خريطة مساحية توضح التخطيط الإجمالي للمشروع والمساحات اللازمة تزج ملكيتها لصالح المشروع وتوحة توضح مسار المرحلة الأولى من مترو أبو قير والمحطات الواقعة عليها .

وتجدر الإشارة إلى أنه قد تم توفير الاعتمادات المالية اللازمة للتعبئة والتفريغ النقدية للملاك الظاهرين بمبلغ ٥٠٠ مليون جنيه ضمن موازنة الهيئة القومية للإنفاق للعام المالي ٢٠٢٠/٢٠٢١ وسيتم إيداعها بخزنة الجهة المنفذة لهذا القرار خلال شهر من تاريخ صدوره طبقاً لما تحدده اللجنة المختصة المشكلة بالمادة (٦) من القانون ١٠ لسنة ١٩٩٠ وتعديلاته .

وفي ضوء ما تقدم ، نتشرف بأن نرفق طيه مشروع قرار رئيس مجلس الوزراء لإنشاء صفة النفع العام على مشروع المرحلة الأولى للمترو أبو قير الذي سيتم تنفيذه في ذات مسار خط سكة حديد أبو قير - الإسكندرية في المسافة من أبو قير شرقاً حتى محطة مصر بمحافظة الإسكندرية والاستيلاء بطريق التنفيذ المباشر على الأراضي اللازمة لتنفيذ المشروع وذلك على النحو الموضح بعاليه .

وتفضلوا بقبول فائق الاحترام

وزير النقل

فريق/ كامل سيد الهادي الوزير

APPENDIX 2B: LAND ACQUISITION MINISTERIAL DECISION



الجزء رقم ١٠ من الميزانية العامة للدولة

التمويل ١٠ جنيهات

السنة الرابعة والستون	الصادر في ٢٤ ربيع الآخر سنة ١٤٤٣ هـ الموافق (٢٩ نوفمبر سنة ٢٠٢١ م)	العدد ٤٧ مكرر (و)
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٢ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١

قرار رئيس مجلس الوزراء

رقم ٢٢٠١ لسنة ٢٠٢١

رئيس مجلس الوزراء

بعد الاطلاع على الدستور ؛

وعلى قانون نظام الإدارة المحلية الصادر بالقانون رقم ٤٣ لسنة ١٩٧٩
ولاتحته التنفيذية ؛

وعلى القانون رقم ١٠ لسنة ١٩٩٠ بشأن نزح ملكية العقارات للمنفعة العامة
ولاتحته التنفيذية ؛

وعلى قرار رئيس الجمهورية رقم ٢٧٩ لسنة ٢٠١٨ بالتفويض في بعض الاختصاصات ؛
وعلى قرار رئيس مجلس الوزراء رقم ٢٣٦٠ لسنة ٢٠٢٠ بشأن اعتبار مشروع
المرحلة الأولى لمترو أبو قير من أعمال المنفعة العامة ؛
وبناءً على ما عرضه وزير النقل ؛

قرر:

(المادة الأولى)

يُضاف إلى أعمال المنفعة العامة الصادر بشأنها قرار رئيس مجلس الوزراء
رقم ٢٣٦٠ لسنة ٢٠٢٠ المشار إليه بعض مسطحات الأراضي والعقارات اللازمة
 لتنفيذ مشروع المرحلة الأولى لمترو أبو قير الذي سيتم تنفيذه في ذات مسار خط
 سكة حديد أبو قير - الإسكندرية في المسافة من أبو قير شرقاً حتى محطة مصر
 بمحافظة الإسكندرية ، وذلك على النحو الموضح بالمذكرة والخرائط المساحية المرفقة.

(المادة الثانية)

يُستولى بطريق التنفيذ المباشر لصالح الهيئة القومية للإنفاق على مسطحات
الأراضي والعقارات الإضافية المشار إليها في المادة السابقة ، والمبين موقعها
 وحدودها وأسماء ملاكها الظاهرين بالمذكرة والخرائط المساحية والكثوف المرفقة .

٣ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١

(المادة الثالثة)

يُنهى تخصيص الأراضي والعقارات المملوكة لجهات حكومية والموضح ببياناتها
وملاكها الظاهرين بالمذكرة والخرائط المساحية والكثوف المرفقة ويعدل تخصيصها
للتفيع العام دون مقابل لصالح الهيئة القومية للإنفاق .

(المادة الرابعة)

يُنشر هذا القرار في الجريدة الرسمية ، ويعمل به من اليوم التالي لتاريخ نشره .
صدر برئاسة مجلس الوزراء في ٢٤ ربيع الآخر سنة ١٤٤٢ هـ
(الموافق ٢٩ نوفمبر سنة ٢٠٢١ م) .

رئيس مجلس الوزراء

دكتور/ مصطفى كمال مدبولي

٤ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١

وزارة النقل

مذكرة إيضاحية

تقرار رئيس مجلس الوزراء

بشأن تعديل قرار رئيس مجلس الوزراء رقم ٢٣٦٠ لسنة ٢٠٢٠

الصادر لإضفاء صفة النفع العام على مشروع المرحلة الأولى لمترو أبو قير

صدر قرار رئيس مجلس الوزراء رقم ٢٣٦٠ لسنة ٢٠٢٠ بتاريخ ٢٩/١١/٢٠٢١

لإقرار صفة النفع العام على مشروع المرحلة الأولى لمترو أبو قير الذي سيتم تنفيذه في ذات مسار خط سكة حديد أبو قير - الإسكندرية في المسافة من أبو قير شرقاً حتى محطة مصر بمحافظة الإسكندرية (مرفق رقم ١) .

وقى ضوء الطبيعة الخاصة للمشروع والتي تقتضى تعدد مواقع العمل ، فإنه يتعدّر حصر جميع ملاك الأراضي والعقارات المتداخلة مع المشروع ومساحة ما يملكه كل منهم وما قد يتطلبه المشروع من أجزاء إضافية إلا بعد صدور القرار بتقرير صفة النفع العام وبدء أعمال اللجان المختصة في الحصر ، لذا فقد تطلب تنفيذ المشروع على الوجه الأكمل إضافة بعض مسطحات الأراضي والعقارات اللازمة لتنفيذ الأتي :

١ - إضافة محطتي (محمد نجيب - كفر عبده) إلى مسار المشروع بحيث يكون متوسط المسافة البيئية بين المحطات حوالي (١) كيلو متر .

٢ - إضافة مسطحات إضافية من الأراضي لإنشاء محطتي سيورتنج وباب شرق حيث إن مسار المشروع عند هاتين المحطتين غير كافٍ لإنشاء المحطتين والمسالم الخاصة بهما .

المرجعة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١ ٥

وجدير بالذكر أنه سيتم تدبير مبلغ (١٠٠) مليون جنيه وفقاً للتأشيرات العامة لموازنة الهيئة القومية للإنفاق للعام المالي ٢٠٢١/٢٠٢٢ اللازمة للتعويضات التقديرية المبدئية للملاك الظاهرين وسوف يتم إيداعها خزانة الجهة المتفذة لهذا القرار خلال ثلاثة أشهر من تاريخ صدوره طبقاً لما تحدده اللجنة المختصة المشكلة بالمادة (٦) من القانون رقم ١٠ لسنة ١٩٩٠ وتعديلاته .

مرفق طيه ما يلي :

١ - عدد (١٠) خزائن مساحية توضح التخطيط الإجمالي للمشروع .
(مرفق رقم ٢) .

٢ - كشوف الملاك الظاهرين وكروت الوصف للأراضي والعقارات المطلوب تعديل تخصيصها / تزج ملكيتها لصالح الهيئة القومية للإنفاق لتنفيذ المشروع .
(مرفق رقم ٣) .

وقى ضوء ما تقدم ، تشرف بأن ترفق طيه مشروع قرار رئيس مجلس الوزراء بتعديل قرار رئيس مجلس الوزراء رقم ٢٣٦٠ لسنة ٢٠٢٠ الصادر لإقرار صفة النفع العام على مشروع المرحلة الأولى لمترو أبو قير الذي سيتم تنفيذه في ذات مسار خط سكة حديد أبو قير - الإسكندرية في المسافة من أبو قير شرقاً حتى محطة مصر بمحافظة الإسكندرية بإضافة بعض مسطحات الأراضي والعقارات اللازمة والاستيلاء بطريق التنفيذ المباشر عليها لتنفيذ المشروع وذلك على النحو الموضح بهاليه .

وتفضلوا بقبول فائق الاحترام

وزير النقل

هريق/ كامل عبد الهادي الوزير

٦ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



سعد

كشوف بيان الملاك الظاهرين للأراضي المطلوب نزع ملكيتها لتنفيذ محطات مشروع مترو الإسكندرية

الفرش من نزع الملكية	وصف العقارات		العنوان	اسم المالك الظاهر
	نوع المنشأ	المقاسات		
تخصيص الأرض لعمل محطة سيورتنج	ارض قضاء	المساحة = ٨٨٧ م ^٢	قنبي السكة الحديد بالقرب من محطة سيدي جابر - شارع نوت غنغ آمون	ملكية خاصة (المالك غير معروف)
تخصيص الأرض لعمل محطة باب شرق	ارض قضاء	المساحة = ١٢٢ م ^٢	بحري السكة الحديد - نهاية شارع بانستور	ملكية خاصة (المالك غير معروف)



١٤٥ - ٥١ مرات

٧ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١

كشوف بيان الملاك الظاهرين للأراضي المطلوب إعادة تخصيصها لتنفيذ محطات مشروع مترو الإسكندرية

الفرش من نزع الملكية	وصف العقارات		العنوان	اسم المالك الظاهر
	نوع المنشأ	المقاسات		
تخصيص الأرض لعمل محطة سيورتنج	وحدة صحبة	المساحة = ٨٥٢ م ^٢	بحري السكة الحديد بالقرب من محطة سيدي جابر - نهاية شارع محمد باقرت عطية	محافظة الإسكندرية
تخصيص الأرض لعمل محطة باب شرق	جزء من الرصيف وجزء من منطقة انتظار السيارات	المساحة = ٢٨٠ م ^٢	بحري السكة الحديد شارع بروج	محافظة الإسكندرية
تخصيص الأرض لعمل محطة باب شرق	استراحة	المساحة = ٨٦٩ م ^٢	قنبي السكة الحديد	هيئة سكة حديد مصر



٨ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



كروت الوصف

٩ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١

كروت وصف تزع الملكية

كارت رقم ١

تعاريف وصف تزع الملكية

تعاريف: فلى السنة الحيد بالقرب من محطة ميدى حابر- شارع نوت حنج
نون

شعك نظام الارض : ملكية خاصة (ملك غير معروف)

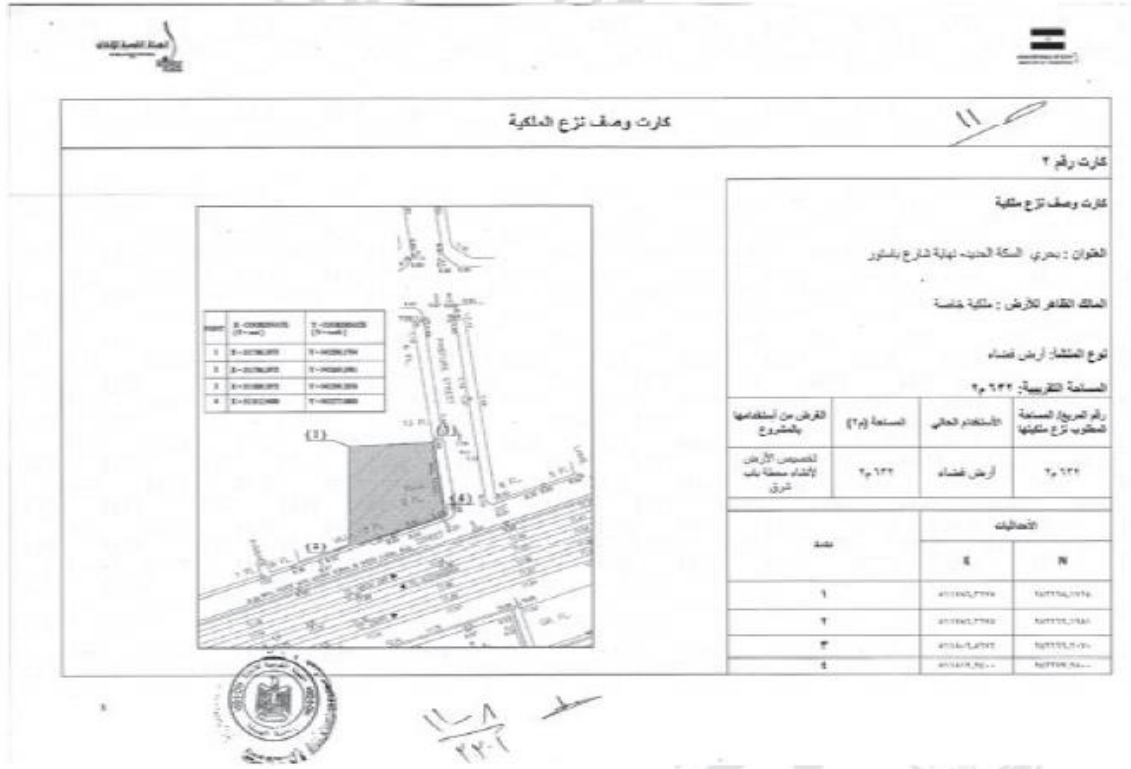
نوع المنشأ: ارض قضاء

تسلسل القويون: ٢م.٨٨٧

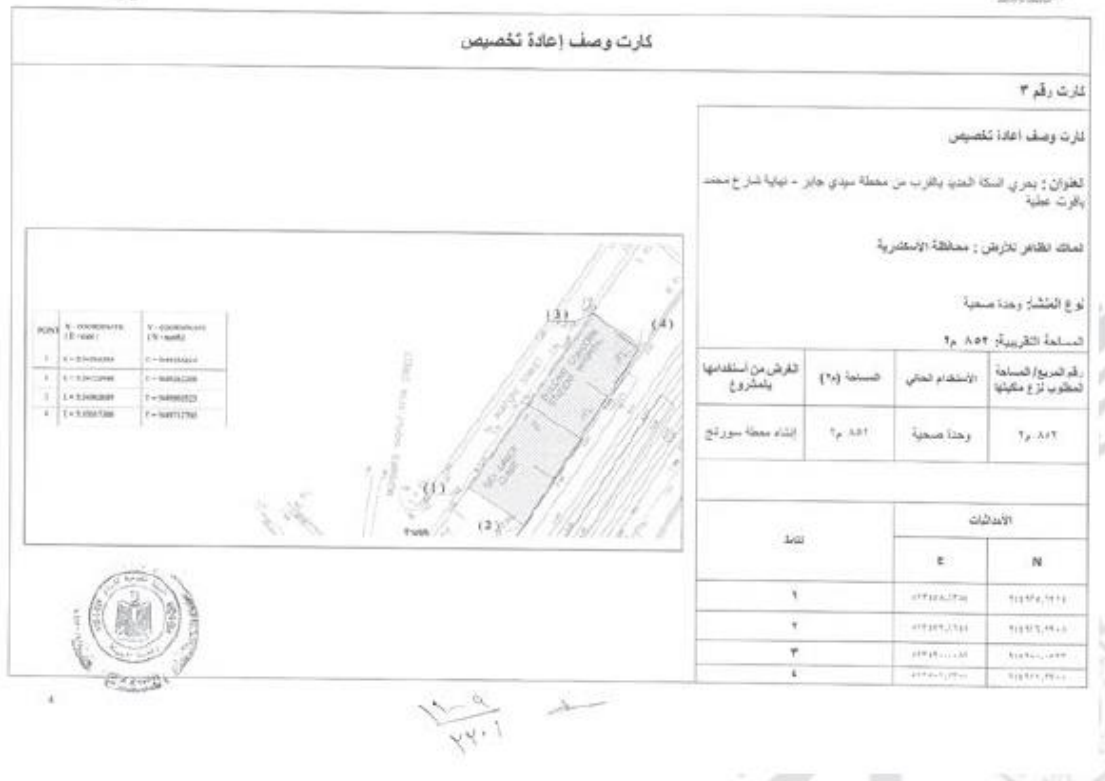
رقم التذرع/ المساحة للعقوب تزع ملكيتها	الاستخدام الحالي	المساحة (م ^٢)	القرض من استقامتها بالمشروع
٢م.٨٨٧	ارض قضاء	٢م.٨٨٧	تسلسل الارض تسلسل محطة سبور تزع

نقط	الاعدالت	
	E	N
١	٥٢٢١٤,٢٢٤٤	٤٤٥٩٤,٢٢٤٤
٢	٥٢٢١٤,٢٢٤٤	٤٤٥٩٤,٢٢٤٤
٣	٥٢٢١٤,٢٢٤٤	٤٤٥٩٤,٢٢٤٤
٤	٥٢٢١٤,٢٢٤٤	٤٤٥٩٤,٢٢٤٤

١٠ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



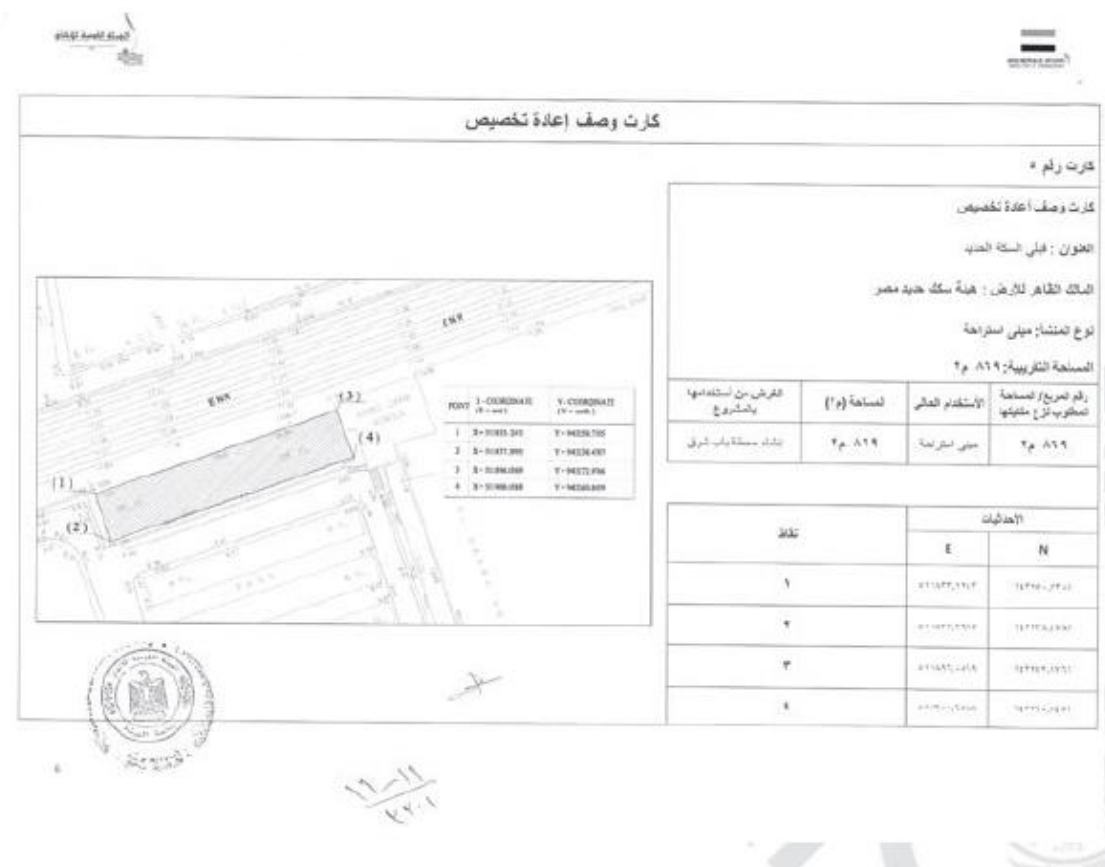
١١ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



١٢ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



١٣ الجريدة الرسمية - العدد ٤٧ مكرر (و) في ٢٩ نوفمبر سنة ٢٠٢١



APPENDIX 3: DEMOGRAPHICS, EMPLOYMENT, INCOME AND PUBLIC INFRASTRUCTURE

Demographic Profile

The demographic data presented in this section was used to identify the Project affected groups to be included in the socio-economic survey methodology described in **Chapter 5 RAP Methodology**. The results of the socio-economic survey were presented in **Chapter 6 Affected People and Assets** and analysed to determine the Project impacts as summarised in **Chapter 7 Project Impacts**. The Project impacts were considered in order to determine the eligibility criteria and to develop the entitlements matrix (presented in **Chapter 9 Entitlements and Compensation Section 9.2** of this RAP).

Population

Table 1 describes the distribution of the PAP population according to the results of the socio-economic survey.

With regard to private landowners, the RAP team has not yet had an official statement from ESA on the number of PAPs. The socio-economic survey was conducted with some of the landowners and their representatives.

Table 1 Distribution of PAPs According to the Population

PAP Groups	Number of PAPs	Number of Family Members		
		Male	Female	Total
Tenants of shops located in stations	8 Tenants	20	18	38
Informal users within the Project alignment	21 Informal users	49	59	108
Shops externally adjacent to the Project alignment corridor	65 Shop	164	136	300
Households externally adjacent to the Project alignment corridor	40 Household	81	61	142
Total	134	314	274	588

The results of the socio-economic survey showed that the total number of affected persons (588 PAPs¹⁰⁹) including the number of family members for all PAPs. Approximately 75% of the total sample of PAPs (442 PAPs) potentially impacted by the Project are shops and households externally adjacent/close to the Project alignment corridor. The primary PAPs comprise about 25% of the total sample (146

¹⁰⁹ This number includes the total number of family members for all PAPs groups included in the study sample, including households and shops externally adjacent to the Project alignment corridor.

PAPs) (including the total number of family members). The demographic data of the study sample indicates that 53% of the total sample of PAPs are male compared to 47% that are female.

Distribution according to Age Groups

Table 2 shows the distribution of PAPs by age group from the results of the socio-economic survey. 40% of the PAPs are within the 31-45 year age group representing the largest percentage followed by the 46-60 age group at approximately 36% . The age group with the lowest representation are the 20-30 and 61+ age groups at 12% each. This indicates that the majority of the PAPs are of working age.

Table 2 Distribution of PAPs According to Age Groups¹¹⁰

PAPs	20-30	31-45	46-60	61 and Above
Tenants of shops located in stations	1	4	2	1
Informal users within the alignment	2	7	9	3
Shops outside and adjacent to the Project alignment corridor	8	26	23	8
Households outside and near to the Project alignment corridor	5	17	14	4
Total	16	54	48	16

Distribution according to gender

The results of the socio-economic survey identified that 19% of PAPs are female (25), indicating that the majority of PAPs are male. The results of the survey indicated that the women who rent shops, whether inside the stations or externally adjacent to the Project alignment are the breadwinners for their families, two of whom inherited the shop from their father or husband. This does not apply to the sample from the household surveys as the percentage of female respondents is due to their presence at home at the time of the survey.

Table 3 describes the gender distribution according to each group of PAP. This shows that the percentage of male PAPs is higher than female PAPs (81% male compared to 19% female). It is worth noting that there are no restrictions or limitations imposed by ENR for females to rent shops within and externally adjacent to the Project alignment.

Table 3 Distribution of PAPs According to Gender

PAPs	Male	Female
Tenants of shops located in stations	7	1
Informal users within the alignment	21	-

¹¹⁰ The data presented in this table does not include landowners due to their unavailability during the survey.

PAPs	Male	Female
Shops outside and adjacent to the Project alignment corridor	60	5
Households outside and near to the Project alignment corridor	21	19
Total	109	25

Figure 1 shows the distribution of PAP groups according to gender in each group. Informal users within the Project alignment are all male with no female users. Tenants of shops located in stations consist of 87% male and 13% female tenants. Shops externally adjacent to the Project alignment corridor comprise 92% males and 8% female. Family members by gender within the households externally adjacent to the Project alignment corridor comprises 52% male and 48% female.

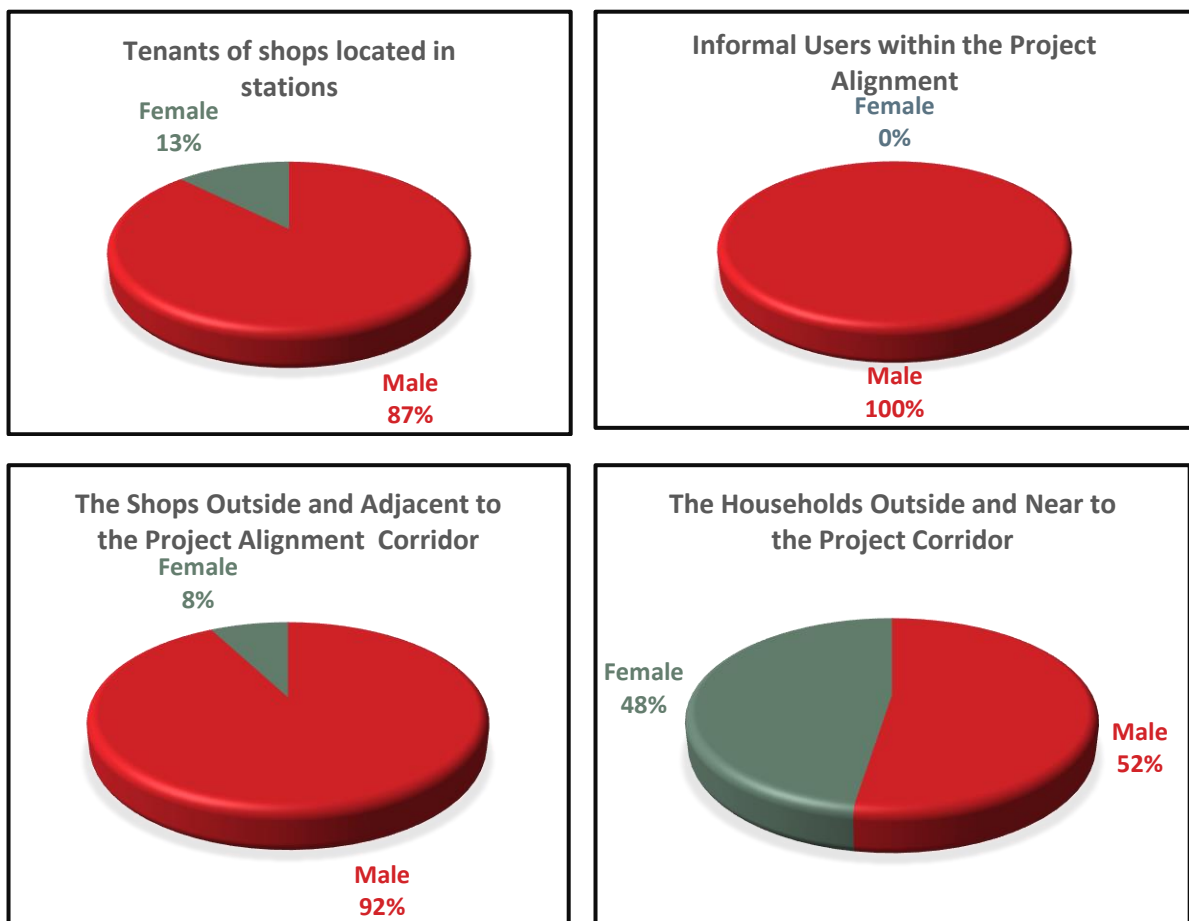


Figure 1 Distribution of PAPs according to gender

Distribution of PAPs According to Education

The results of the socio-economic survey showed the diversity of educational status among PAPs. 5% of all PAPs (7) are literate with a low percentage. PAPs with secondary/ technical secondary education represent the highest percentage within the PAPs educated at 25.4%, followed by PAPs with university degrees at 19.4% with tenants of shops externally adjacent to the Project alignment comprising 65%

of them. 18.6% of PAPs have a primary school education, whereas 10.4% of the PAPs fall under each of the following: uneducated, intermediate and preparatory school education categories.

Table 4 describes the distribution of PAPs by educational status, which is also illustrated in **Figure 2** below.

Table 4 Distribution of PAPs according to the educational status of each PAPs group

PAPs	Uneducated	Read and write	Primary	Preparatory	Secondary / Technical secondary	Intermediate	University
Tenants of shops located in stations	-	1	2	1	3	-	1
Informal users within the Project alignment	4	2	6	4	4	-	1
Shops adjacent and Near to the Project alignment corridor	3	2	4	5	22	12	17
Households Outside and near to the Project alignment corridor	7	2	13	4	5	2	7
Total	14	7	25	14	34	14	26

It is noted from a review of the data provided in **Table 4** that the percentage of PAPs who have a university education in two categories: tenants of shops located in stations and informal users within the Project alignment is very low (only 1 PAP in each category). This can be compared to the 65% of PAPs surveyed from the sample of shops externally adjacent to the Project alignment having undergone university education. The analysis of the data in **Table 4** of the educational situation of PAPs directly impacted by the Project (i.e. tenants of shops located in stations and informal users within the Project alignment) indicates a low level of education, particularly for informal users within the Project alignment. This, in turn, reflects the socio-economic status of those affected.

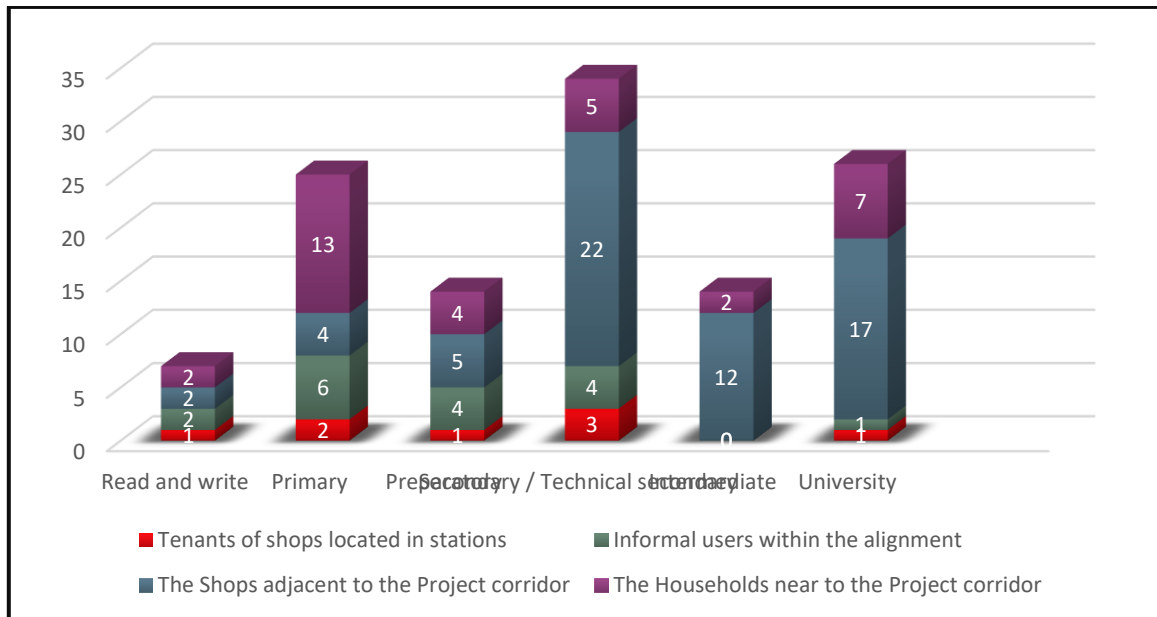


Figure 2 Distribution of PAPs according to education

Distribution of PAPs according to social status

Table 5 describes the results of the socio-economic survey which show that the vast majority of PAPs are married (76% of the total number of PAPs or 102 PAPs), and as such would be responsible for providing for their families which increases their social and economic obligations. This is compared to 13.4% of the total affected (18 PAPs) being unmarried (single). In addition, a small proportion of PAPs surveyed are either widowed (7%), divorced (2%) or separated (1%).

Table 5 Distribution of PAPs according to social status

PAPs	Single	Married	Separated	Divorced	Widower
Tenants of shops located in stations	-	8	-	-	-
Informal users within the Project alignment	1	18	-	1	1
Shops externally adjacent to the Project alignment	11	53	-	1	-
Households externally adjacent to the Project alignment	6	23	2	1	8
Total	18	102	2	3	9

Employment and Income

Income

- **Type of wage or salary/ income**

Table 6 describes the results of the socio-economic survey in terms of income/ wage. The data shows that the vast majority of PAPs have an unstable income, as 93.6% of PAPs (88) confirmed that the income they receive is unstable and varies from day to day and from season to season. This is consistent with the nature of these type of economic activities which experience variable income related to the volume of commercial activity (i.e. footfall) and prices charged for goods. Only 6.4% of the PAPs (6) stated that their income is stable with monthly income being consistent.

Table 6 Type of Wage or Salary/Income

PAPs	Stable Salary/Income	Unstable Salary/Income
Tenants of shops located in stations	-	8
Informal users within the Project alignment	1	20
Shops externally adjacent to the Project alignment	5	60
Total	6	88

- **Income Amount**

Table 7 shows the distribution of PAPs by monthly income categories. According to the socio-economic survey data, most of the PAPs are below the minimum wage level. The income category 1,501-2,000 EGP is the most common among the PAPs as it represents 26% of the total sample. This is followed by 18% of PAPs with a 2,001-2,500 EGP monthly net income, 15% of PAPs with each of a 3,001-4,000 EGP and 1,001-1,500 EGP monthly net income respectively.

Table 7 Distribution of PAPs According to Net Income Amount (Monthly Data)

PAPs	500-1,000 EGP	1,001-1,500 EGP	1,501-2,000 EGP	2,001-2,500 EGP	3,001-4,000 EGP	4,001-5,000 EGP	5,001-6,000 EGP	More than 6,001 EGP	Do not know	Refused to answer ¹¹¹
Tenants of shops located in stations	-	2	1	1	2	1	1	-	-	-
Informal users within the	4	6	6	1	1	1	1	1	-	-

¹¹¹ Some respondents preferred to use their right not to answer questions related to income, as some of them hinted at their lack of confidence in the RAP team, as they may have a connection with the Income Tax Authority or any governmental supervisory body such as the Labour Office or Social Insurances.

PAPs	500-1,000 EGP	1,001-1,500 EGP	1,501-2,000 EGP	2,001-2,500 EGP	3,001-4,000 EGP	4,001-5,000 EGP	5,001-6,000 EGP	More than 6,001 EGP	Do not know	Refused to answer ¹¹¹
Project alignment										
Shops externally adjacent to the Project alignment	4	6	17	15	11	2	1	1	6	2
Total	8	14	24	17	14	4	3	2	6	2

- **Other sources of income**

Table 8 presents the results of the socio-economic survey in relation to other sources of income. Out of 94 PAPs, the vast majority of PAPs (82%) have no other source of income and as such their livelihoods depend exclusively on the source of income from the economic activity that will be affected by the Project making them more vulnerable. 18% of PAPs (17) indicated that they had another source of income.

Table 8 Distribution of PAPs According to Other Sources of Income

PAPs	Other sources of income
Tenants of shops located in stations	2
Informal users within the Project alignment	1
Shops externally adjacent to the Project alignment	14
Total	17

- **Income generated for multiple households**

According to the survey results presented in **Table 9**, 50% of PAPs generate income for other families/households (47 PAPs), whereby the respondent supports the family of their deceased brother, whilst another supports their mother and sisters.

Table 9 Distribution of PAPs According to Income Generated for Multiple Households

PAPs	Income generated to support multiple households
Tenants of shops located in stations	3
Informal users within the Project alignment	9
Shops externally adjacent to the Project alignment	35

PAPs	Income generated to support multiple households
Total	47

Employees

It is clear from the results of the socio-economic survey that 50% of the shops, whether located within the existing stations or externally adjacent to the Project alignment, have employees. These employees are employed without formal work contracts or social insurance. According to the business owners, the vast majority of employees work full-time, however the employee turnover rates are high. Some of the employees are seasonal ranging from university students to transitional workers who may work for a short period of time until other opportunities arise such as higher paying jobs or jobs located clear to their area of residence become available. **Table 10** shows that 50% of shops (47 shops) have employees and presents the employee gender distribution. Male employment predominates female workers employed with a rate of 78.7% to 21.3%. Female employment is also limited to the shops externally adjacent to the Project alignment.

In general, the presence of employees in the shops located inside the stations is limited to 4 employees (8.5% which are all male) only out of the total of 47 employees. No workers are employed by informal users (stationary and mobile vendors) within the Project alignment as the workforce relies only on the business owner themselves.

Table 10 Distribution of PAPs According to Employees in the Shops

PAPs	Number of shops that have employees	Number of Male Employees	Number of Female Employees
Tenants of shops located in stations	4	4	-
Informal users within the Project alignment	-	-	-
Shops outside and adjacent to the Project alignment corridor	43	33	10
Total	47	37	10

- **Wages of a regular employee**

Table 11 shows the categories of wages for the affected and potentially affected shops. The table demonstrates that an average monthly wage of 1,001-1,500 EGP has the highest percentage of wages paid along the Project alignment at 47.8%. This is followed by wages between 1,501-2,000 EGP and between 500-1,000 EGP at 21.3% and 15.2% of the total sample respectively.

Table 11 Distribution of PAPs According to Wages of a Regular Employee

PAPs	500-1,000 EGP	1,001-1,500 EGP	1,501-2,000 EGP	2,001-2,500 EGP	3,001-4,000 EGP	4,001-5,000 EGP
Tenants of shops located in stations	1	1	1	-	1	-
Informal users within the Project alignment	-	-	-	-	-	-
Shops externally adjacent to the Project alignment	6	21	9	3	3	1
Total	7	22	10	3	3	1

Monthly rent value

Table 12 shows the monthly rental values paid as reported in the socio-economic survey. The majority of the business owners are tenants. The rent values vary according to how recent the tenancy agreement was signed and are shown in **Table 12** below. The data shows that the rent value category (less than 200 EGP) is the most common category of rent value at 37.5% the total sample among the shops rented. This is followed by the rent value category of 2,001-2,500 EGP at 23.4%, 500-1,000 EGP at 11% and 1,001-1,500 EGP at 9.3% of the total sample.

Table 12 Distribution of PAPs According to Monthly Rent Value

PAPs	less than 200 EGP	20-500 EGP	500-1,000 EGP	1,001-1,500 EGP	1,501-2,000 EGP	2,001-2,500 EGP	5,000 EGP or more	Do not know
Tenants of shops located in stations	-	-	3	2	2	1	-	-
Informal users within the Project alignment	-	-	-	1	-	-	-	-
The Shops externally adjacent to the Project alignment ¹¹²	24	2	4	3	6	14	2	8
Total	24	2	7	6	8	15	2	8

¹¹² Two business owners who participated in the socio-economic survey confirmed that they do not pay rent for the shops, as these shops are their private property.

Public Infrastructure and Services

69% of the shops externally adjacent to the Project alignment that were sampled include an electricity supply, with 31% of these shops (15) include a water supply. In relation to the shops located inside the existing stations, 5.3% of shops (5) are connected to electricity, 2 of which are equipped with an electricity meter and pay monthly bills, the remaining 3 shops pay a monthly bill to ENR through the railway station administration for electricity. The value of electricity consumption for shops ranges from (100 to 220 EGP). 1 shop located inside the existing stations has a water supply.

There are no staff amenities (toilets, washing facilities) provided in the shops externally adjacent to the Project alignment. The shop employees rely on the use of public sanitation facilities associated with the nearby mosques. The shops located inside the stations depend on the facilities provided in the station for a monthly fee (50 EGP) paid by the shop.

Table 13 Distribution of PAPs According to Infrastructure and Services

PAPs	Electricity	Water source	Sanitation
Tenants of shops located in stations	5	1	-
Informal users within the Project alignment	-	-	-
Shops externally adjacent to the Project alignment	65	15	-
Total	70	16	-

APPENDIX 4: MOSQUES COMPENSATION RELATED DOCUMENTS

ARAB REPUBLIC OF EGYPT
MINISTRY OF TRANSPORT
Minister's Office

جمهورية مصر العربية
وزارة النقل
مكتب الوزير

17 JUN 2020
ر.م. الصلح
٢٤٧٤
٣

السيد الدكتور مهندس / عصام والى
رئيس مجلس إدارة
الهيئة القومية للإنفاق

تجبة طيبة وبعد ..

إحافا لكتاب السيد الفريق / وزير النقل رقم ٥٨٦٣ بتاريخ ٢٠٢٠/٥/٣١ للسيد الدكتور / وزير الأوقاف والمبلغ صورته لميادنتكم بشأن المساجد المطلوب إزالتها لمعارضتها تنفيذ مشروع مترو أبو قير على الكثافة بمحافظة الاسكندرية والمخطط قوام الوزارة بتكفيده فى نفس مسار خط سكة حديد أبى قير الحالى كمرحلة أولى مع امتداده إلى مدينة برج العرب فى المرحلة الثانية وذلك فى ضوء توجيهات السيد رئيس الجمهورية الصادرة فى هذا الشأن ، والمتضمن عدم التزام وزارة النقل بتوفير أراضي بديلة أو توفير مبالغ ثمن الأرض البديلة للمساجد فى ضوء وقوع هذه المساجد داخل إملاك هيئة السكة الحديد واستعداد الوزارة توفير المبالغ المطلوبة لبناء مساجد بديلة للمساجد التى سيتم إزالتها أو تطوير مساجد أخرى فور توفير الأراضي البديلة لهذه المساجد أو تحديد المساجد المطلوب تطويرها وذلك على النحو الوارد بالكتاب المشار اليه بعاليه .

أرسل لميادنتكم رفق هذا صورة كتاب السيد الاستاذ الدكتور / وزير الأوقاف رقم ١٧٠ بتاريخ ٢٠٢٠/٦/١٥ بشأن الاجراءات التى تم اتخاذها والمطلوب فى هذا الشأن .

وبالعرض على السيد الفريق / وزير النقل أشتر سيادته (م / وجدى شحات ، مخاطبة ه الأفاق لتبديل المبلغ وتسيده لوزارة الأوقاف ومتابعة هدم المساجد والتخفيف على الأرض) .

فالمرجو التفضل بالإحاطة والتوجيه لاتخاذ اللازم والإفادة بما يتم استكمالاً للعرض على السيد الفريق / وزير النقل فى هذا الشأن .

وتفضلوا سيادنتكم بقبول فائق الاحترام،،،

رئيس الإدارة المركزية
لشئون مكتب الوزير
إ.م. مصطفى
١٦/٦/٢٠٢٠
(إسماعيل محمد مصطفى)

قطار حالى
تخطيط ودراسات
شؤون قانونية
متابعة

صورة للسيد المهندس / لطفى محمد رمضان - رئيس مجلس إدارة الهيئة القومية لسكك حديد مصر
صورة للسيد المهندس / وجدى شحات - مساعد الوزير لشئون سكك الحديد وشؤون الاتفاق ووسائل نقل سكك حديد مصر

٦١١٨ ١٩٤٣/١٥
N.A.T.
TUNNELS
١٢
١٢

١٧٠
٢٠٢٠/١٥
٤٣

مكتب الوزير
١٦ يونيو ٢٠٢٠
رقم الأوقاف ١٣٤٠٠١٠١
وزارة الأوقاف
الوزير

عالي السيد الفريق / كامل عبد الهادي الوزير
وزير النقل

المحترم

السلام عليكم ورحمة الله وبركاته ...

وبعد :

فبالإشارة إلى كتاب سيادتكم رقم (٥٨٦٣) بتاريخ ٢٠٢٠/٥/٣١ م ، بشأن كتابنا لسيادتكم رقم (٨٧ ص. ز + م ٢) المؤرخ ٢٠٢٠/٤/١٢ م ، والمرفق به مذكرة السيد المهندس / رئيس قطاع الخدمات المركزية ، بخصوص المساجد المطلوب إزالتها لمعارضتها تنفيذ مشروع " مترو أبو قير عالي الكثافة " بمحافظة الإسكندرية ، والمخطط قيام وزاراتكم الموافقة بتنفيذه في نفس مسار خط سكة حديد أبي قير الحالي كمرحلة أولى مع امتداده إلى مدينة برج العرب في المرحلة الثانية ، وذلك في ضوء توجيهات السيد / رئيس الجمهورية في هذا الشأن؛ وإيماء لكتابكم سالف الذكر باستعداد وزاراتكم الموافقة لتوفير المبالغ المطلوبة لبناء مساجد بديلة للمساجد التي سيتم إزالتها أو تطوير مساجد أخرى .

واستجابة لطلب معاليكم باستبعاد لمن الأرض كونها في زمام أملاك السكة الحديد فقد تم ذلك بالفعل واتصر التقدير على قيمة المباني فقط ، ولصالح النفع العام فإنني إضافة إلى ذلك قد خفضت مقايمة الإدارة المركزية للشئون الهندسية المرفقة لتكلفة المباني ٢٢٪ تقريباً ليصبح إجمالي المبلغ المطلوب موافقتنا به من وزاراتكم الموافقة بشأن الثلاثة عشر مسجداً المبينة بالمذكرة المرفقة (٢٥,٠٠٠,٠٠٠) خمسة وعشرين مليون جنيه بدناً من التكلفة المقدرة بالمذكرة المشار إليها بمبلغ (٣٢,١٠٥,٠٠٠) اثنين وثلاثين مليوناً ومائة وخمسة آلاف جنيه ، وفور موافقتنا بالمبلغ المطلوب على الكود المؤسسي لوزارة الأوقاف رقم (١٣٤٠٠١٠١) سيتم تفويض وزاراتكم في هدم المساجد بمعرفتها .

وتفضلوا بقبول فائق الاحترام والتقدير ...

وزير الأوقاف
محمد مختار جمعة
أ.د / محمد مختار جمعة
مع فائق الاحترام والتقدير

٢٣ من نوال ١٤٤١ هـ
١٥ من يونيو ٢٠٢٠ م



وزارة الأوقاف

الإدارة المركزية للشئون الهندسية

مذكرة للمعرض على

معالي الأستاذ الدكتور الوزير

الموضوع : بالإشارة إلى تأشيرة معاليكم على الخطاب الوارد من سيادة الفريق أ. ح / كامل عبد الهادي الوزير - وزير النقل والمواصلات ، بشأن المساجد المطلوب إزالتها لمعارضتها تنفيذ مشروع " مترو أبو قير عالي الكثافة " بمحافظة الإسكندرية ، وإحاطاً بالمذكرة المعروضة على سيادتكم في ذات الشأن بتاريخ ٢٠٢٠/٤/١٢ م ، ردًا على خطاب معالي وزير النقل رقم (٢٩٧٩) بتاريخ ٢٠٢٠/٣/٩ م ، وإيماءً إلى ما ورد بخطاب معاليه رقم (٥٨٦٣) بتاريخ ٢٠٢٠/٥/٣١ م .

نتشرف بأن نعرض على معاليكم الآتي :

أولاً : بالنسبة للمساجد الحكومية :

أقادت مديرية أوقاف الإسكندرية بعد حضور الاجتماع التنسيق الذي تم بمقر الهيئة القومية للأوقاف أن المساجد التي تعترض إقامة المشروع هي مساجد :

م	اسم المسجد	المساحة	عدد الأدوار	تقدير قيمة المباني جنيه
١.	الفاتحين - شربال	١٥٠ م	-	١٢٧٥٠٠٠
٢.	علي بن أبي طالب - سيدى بشر	١٨٠ م	٢	٢١٠٠٠٠٠
٣.	خالد بن الوليد - الملك الحنفى	١٨٠ م	-	١٥٣٠٠٠٠
٤.	نور الإسلام - مدينة فيصل	٢٠٠ م	٢	٣٠٠٠٠٠٠
٥.	دار السلام - المنيرة	١٥٠ م	-	١٢٧٥٠٠٠
٦.	الهدى	١٥٠ م	-	١٢٧٥٠٠٠
٧.	نور الإسلام باكوس	٩٠ م	-	٧٦٥٠٠٠٠
٨.	المؤمنين شربال	١٢٠ م	-	٨٢٥٠٠٠٠
٩.	قباء - فيكتوريا	٦٠٠ م	-	٥١٠٠٠٠٠
١٠.	الصابرين - سيدى بشر	٩٠ م	-	٦٧٥٠٠٠٠
١١.	بدر - شارع ٤٥	٤٠٠ م	٢	٥٠٠٠٠٠٠
١٢.	أهالى العصاره	٢٠٠ م	-	٤٠٠٠٠٠٠
١٣.	الرحيق المختوم - المعهد الدينى	١٢٥ م	٣	٢٠٠٠٠٠٠
	الإجمالي	٣٤٤٥ م		٢٢,١٠٥,٠٠٠ جنيه

وبناء على ما ورد بخطاب معالي وزير النقل بأن جميع المساجد تقع بحرم السكة الحديد تم إلغاء بند مقابل الأرض .

وتعرض على معاليكم الآتي للموافقة على مخاطبة معالي السيد / وزير النقل للتفضل بموافقاتنا بأمر دفع باسم وزارة الأوقاف من وزارة النقل والمواصلات بمبلغ إجمالي (٣٢,١٠٥,٠٠٠) جنيه وهي قيمة بناء مساجد بديلة ، وفور موافقاتنا بأمر الدفع سيتم إخلاء المساجد من العهد وتفويض وزارة النقل والمواصلات في هدم المساجد بمعرفتها :

رئيس قطاع الخدمات المركزية
م/ مسير الشالبي
١٦/١٥

رئيس الإدارة المركزية للشؤون الهندسية
م/ مهدي عبد الله أبو ميد

مدير عام المشروعات والتصميمات
م/ إيمان فاروق

APPENDIX 5: THE EXECUTIVE MEASURES THAT HAVE BEEN TAKEN TO COMPENSATE MOSQUES

ARAB REPUBLIC OF EGYPT
MINISTRY OF TRANSPORT
Minister's Office

جمهورية مصر العربية
وزارة النقل
مكتب الوزير

السيد الدكتور مهندس / عصام والى
رئيس مجلس إدارة
الهيئة القومية للإنفاق

٣١٦٩٧
٢١٩١١٩

٢٦ SEP 2021

رقم الصادر ١١٠٧١
ملاحظات (٣)

تلبية طيبة ويهدد ...

إلحاقاً لكتاب السيد الفريق / وزير النقل رقم ١٠٠٨١ بتاريخ ٢٠٢١/٩/٤ للسيد الدكتور / وزير الأوقاف والمبلغ صورته لسيداتكم بشأن توجيهات السيد رئيس الجمهورية باتخاذ الإجراءات اللازمة نحو تنفيذ مترو على الكثافة بمحافظه الإسكندرية والذي سيتم تنفيذه في ذات مسار قطار أبى قير وصولاً إلى محطة مصر كمرحلة أولى والإجراءات المطلوبة فيما يخص المساجد المتعارضة مع حركة السكة الحديد على طول مسار المشروع وذلك على النحو الوارد بالكتاب المشار إليه بعالية.

أرسل لسيداتكم وفق هذا صورة كتاب السيد الدكتور / وزير الأوقاف رقم ٤٢٦ بتاريخ ٢٠٢١/٩/٢٢ والمرفق طيه رد السيد المهندس / التوكيل الدائم لوزارة الأوقاف في هذا الشأن وترشيح ممثلين لوزارة الأوقاف للتسيق والتواصل مع المختصين بهيئتكم الموقرة في هذا الشأن .

وبالعرض على السيد الفريق / وزير النقل أشتر سيادته (م/ وجدى شحات ، الهيئة القومية للإنفاق ، لاتخاذ ما يلزم بالتسيق مع المختصين بوزارة الأوقاف لإنهاء الإجراءات والعرض بما يتم في هذا الشأن) فالمرجو التفضل بالإحاطة والتوجيه لاتخاذ اللازم والاقادة بما يتم استكمالاً للعرض على السيد الفريق / وزير النقل .

وتفضلوا سيادتكم بقبول فائق الاحترام ...

رئيس الإدارة المركزية
لشئون مكتب الوزير
أ. محمد مصطفى
١٧٥٦
(أسامة محمد مصطفى)

السيد الدكتور مهندس / عصام والى
رئيس مجلس إدارة
الهيئة القومية للإنفاق

صورة لتسديد المهندس / وجدى شحات - مساعد الوزير لشئون السكة الحديد ومترو الانفاق ووسائل النقل السككي
أحمد البرق

٢٠٢١/٩/٢٦	التاريخ
٢٩٧٠	رقم
حينا	المكان

٢٢ سبتمبر ٢٠٢١
١٦٠٦-
مذكرة
وزارة الأوقاف
الوزير

المعالي السيد الفريق / كامل عبد الهادي الوزير
وزير النقل والمواصلات

المحترم
السلام عليكم ورحمة الله وبركاته ...

وبعد :

فبالإشارة إلى كتاب سيادتكم رقم (١٠٠٨١) بتاريخ ٢٠٢١/٩/٤ م ، بشأن كتابنا
لسيادتكم رقم (١٧٠) بتاريخ ٢٠٢٠/٦/١٥ م ، بخصوص طلب موافاتنا بمبلغ (٢٥) مليون
جنيه على الكون الموسمي لوزارة الأوقاف رقم (١٣٤٠٠١٠١) لإقامة مساجد بديلة بعد
إزالة الثلاثة عشر مسجداً المتعارضة مع حرم السكة على طول مسار تنفيذ مشروع مترو عالي
الكثافة بمحافظة الإسكندرية ، وطلب سيادتكم الإفادة بما تفيده من مساجد بديلة
بمعرفة وزارة الأوقاف حتى تاريخه .

يسرني أن أرفق لسيادتكم رد السيد المهندس الوكيل الدائم لوزارة الأوقاف في هذا
الشان مع قرشيحنا لكل من :

١ - المهندس / سمير محمد مصطفى الشال - الوكيل الدائم لوزارة الأوقاف هاتف
رقم (٠١٢٣٣٤٩٦٩٤٠).

٢ - المهندس / مجدي عبد الله أبو عيد - مدير عام الإدارة العامة للمشؤون الهندسية
بديوان عام وزارة الأوقاف هاتف رقم (٠١٢٠٦٥٩٤٥٩٤) .

للتسيق والتواصل مع من تفوضونه سيادتكم من وزاراتكم الموقرة لإنهاء كل
الإجراءات المتصلة بهذا الشان .

وتفضلوا بقبول فائق الاحترام والتقدير ...

وزير الأوقاف
ر.أ. / محمد مختار جمعة
مع خالص التحية لكم

تحريراً في
٢٢ من سبتمبر ٢٠٢١ م

١٠٠	استور	الطابية	٢٤٠,٠٠٠	تم الانتهاء
١٠١	عزبة	عزبة	١٦٠,٠٠٠	تم الانتهاء
١٠٢	البرلس القبلي	العنزة	١٢٠,٠٠٠	تم الانتهاء
١٠٣	مأذنة المعمورة	المعمورة	٥٠٠,٠٠٠	تم الانتهاء
١٠٤	٨/٤ أيس	أيس	٢٤٧,٨٧٢	تم الانتهاء
١٠٥	علي بن ابي طالب	العابرية	١١٧,١٤٤	تم الانتهاء
١٠٦	الأقوار المحمدية	المنزه	٢٤٠,٠٠٠	جار العمل
١٠٧	خيزرا	خورشيد	٢٤٤,٠٠٠	جار العمل
١٠٨	الشيخ مبر	المدرية	١٨٤,٧٠٥	جار العمل
الإجمالي	مليونان وستان وألف وثلثون ألفاً وستمئة وأحد وعشرون ألفاً فقط			٢,٢٣٣,٧٢١

ثانياً : ما تم إنجازه :-

م	اسم المشروع	المكان	القيمة	تاريخ الإنجاز
١	البحر الكبير	تيج مروج	٤,٣٠٠,٠٠٠	تم الإنجاز بجلسة ٢٠٢١/٣/١٤
٢	الرحبة	العلا الشرقي - النهضة	٤,٠٥٠,٨٦٠	تم الإنجاز بجلسة ٢٠٢١/١٠/١٤
٣	شعب قرية ٦	ريج العرب	٤,٣٠٠,٠٠٠	تم الإنجاز بجلسة ٢٠٢١/١٠/١٤
الإجمالي	١٢,٥٥٠,٨٦٠			

وبذلك يكون إجمالي مبالغ الأعمال التي تمت بعناية مبالغاً وقدره (٢٦٣٦١٩٦١ جنيهًا) وعليه فلا مانع لدينا من إضفاء هذه المساجد بفرقة مديرية أوقاف الإسكندرية وتسجيل كافة المتقولات كمشروعات على المديرية.

بالنسبة للسند رقم (٢) وهو موافقة وزارة النقل يكشف يتضمن حصر جميع الأنشطة داخل كل مسجد ، تحية سيادتكم ان جميع هذه المساجد لإقامة الشعائر الدينية ولا توجد بها أنشطة أخرى .

بالنسبة للسند رقم ٣ والخاس يهدم هذه المساجد ، فلا مانع لدى الإدارة الهندسية من قيام وزارة النقل يهدم هذه المساجد التي لتوق المشروع بمرئتها وعن طريقها.

وتفضلوا بتقبل وافر الاحترام ...

صبراً لى ٢٠٢١ م

مدير عام

الإدارة العام للشؤون الهندسية

(م/ مجدي أبو زيد)

الوكيل القانوني

(م/ سمير الشال)

APPENDIX 6: NGO CONSULTATION MEETING MINUTES

Consultation Meeting Date / Time	March 9, 2022
NGO Details	Youth Men Christians Association - YMCA
Meeting Venue / Online	The headquarters of the association in Alexandria
Meeting Attendees	Mr. Bahjat Aziz - Financial Director of the Association Ms. Iman Fahmy - General Director Assistant of the Association

Section 1: Background Information

1.1	What work does the NGO undertake and how is this relevant to the Project?	YMCA aims to spread awareness, culture and good morals among young people, and it organizes sports teams, useful trips and summer camps for them. The association does not look for religion and does not promote it, and anyone can join it regardless of their religious beliefs. The association cooperates with other associations operating in Alexandria in supporting poor families through young volunteers working in the association.
1.2	How long has the NGO been operating in the Project area?	The YMCA was founded in London in 1844 by the Union of Churches, and then in America in 1851, and spread all over the world after that. The YMCA has 3 branches in Egypt in Cairo, Alexandria and Asut. Alexandria branch was established in 1928.
1.3	Is the NGO considered to represent a specific impacted group on the Project? If yes, how can the NGO assist or support the Project in communicating with these impacted groups?	No

Section 1: Background Information

1.4	Are there any relevant informal groups or associations (such as a mobile vendors association, marketplace community, etc) that the NGO is aware of that should be consulted on this Project?	We have not previously cooperated with associations that provide care services to street vendors or their families, but there are many associations in Alexandria that provide care services to poor families, disabled and the breadwinner woman. The Directorate of Social Solidarity in Alexandria is the party concerned with the NGOs in Alexandria and has a database of all the registered associations in Alexandria and the type of their activities.
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Section 2: Project Perception

2.1	Are you aware of the Project that will be built in this area?	Yes, we, as an association and residents of Alexandria, are aware of the Alexandria Metro project.
2.2	Have you been invited and/or attended any Project-related meetings? If so, please provide details of when, where and summary of discussions.	<p>Yes, we were invited to the consultation sessions that took place in July 2021 for the project. I (Ms. Iman Fahmy) attended with the group represented the National Council for Women in cooperation with the Association for Women and Development in Sidi Bishr.</p> <p>The discussions were very enthusiastic for the project due to the city of Alexandria's need for a good and developed means of transportation. However, there was a great debate about the issue of providing alternative transportation before the Abou Qir train stopped working. We hope that this has been done so that the project can start.</p> <p>From our side, we pointed out the importance of the timing of the construction works, as the city of Alexandria is a target for summer vacationers in the months of July, August until mid-September. Please take into account the increase in population density at this time.</p>
2.2	Has The NGO been approached by any community member group regarding any concerns on the Project? If so, please provide details.	No

Section 2: Project Perception		
2.3	What do you think the public perception on this Project is?	<p>The general perception of the Alexandria metro project is good, but we noticed through the discussions in the disclosure sessions that officials in the governorate and members of the community have many concerns, which are summarized in:</p> <ul style="list-style-type: none"> Providing alternative transportation Traffic problems in Alexandria, and the possible increase in the construction phase of these problems The traffic density of the side streets in Alexandria and the poor condition of these streets Long construction time, which can increase these problems The structural condition of the old houses closes to the project path and the possibility of it being affected by the construction.
2.4	What can you see for the local community are the benefits of this Project and who do you see are the most likely community groups to benefit from the Project? Please provide details.	<p>This project is of great importance to the residents of Alexandria city, especially the middle-class who are looking for a clean, safe and fast means of transportation that dispenses with the congestion and the associated problems and negatives.</p>
2.5	What can you see for the local community are the impacts of this Project and who do you see are the most likely to be negatively impacted by the Project? Please provide details.	<p>It is likely that during the construction period, all the residents of Alexandria will be negatively affected, but in varying proportions, depending on how close they are to the project site. But after the metro is running, there are unlikely to be negative effects.</p>
2.6	Does the NGO have any specific concerns relating to the Project? If so, please provide details.	<p>As we mentioned before, the main concerns we have are related to the period in which construction work will begin and its impact on traffic density.</p>

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Figure 1: Photo of the meeting with representatives of the YMCA Association

Consultation Meeting Date / Time	March 10, 2022
NGO Details	Caritas Egypt - Alexandria Branch
Meeting Venue / Online	Online - Zoom meeting
Meeting Attendees	Dr. Hany Moris - Alexandria Branch Manager

Section 1: Background Information

1.1	What work does the NGO undertake and how is this relevant to the Project?	<p>Caritas Egypt envision a society where positive values are shared and wherein all people live in justice and dignity. A world characterised by equality and tolerance with regards to race, sex, religion and social status. A place where we care for the vulnerable people in our communities.</p> <p>We strive for social change by respecting the principles of human rights. We build awareness, provide expertise and support vulnerable people and fragile communities. We empower them and create opportunities, so that they may realise their potential and participate in social, economic and cultural life. We work with local, national and international partners – civil society organisations, the business community and governments alike – to foster sustainable development.</p> <p>At Caritas Egypt it all begins with people. We believe that every person is a worthy asset for society. We support the right of people to make their own choices by creating conditions that help them do so. We empower them to influence issues that affect themselves and their communities. We are inclusive and recognize that some people may need additional support to overcome the barriers they face. We believe in partnerships. By sharing our expertise and resources with our partners and beneficiaries, our limited resources are better used and the public better served.</p>
1.2	How long has the NGO been operating in the Project area?	<p>Caritas Egypt is a non-governmental Egyptian organization registered at the Ministry of Social solidarity in 1967 under No. 1150. It has been recognized as a public utility organization in Alexandria in 1975.</p>

Section 1: Background Information

1.3	Is the NGO considered to represent a specific impacted group on the Project? If yes, how can the NGO assist or support the Project in communicating with these impacted groups?	Currently, Caritas is not considered a representative of a particular group affected by the project. No affected group has contacted us to represent it.
1.4	Are there any relevant informal groups or associations (such as a mobile vendors association, marketplace community, etc) that the NGO is aware of that should be consulted on this Project?	We recently heard about the establishment of an association for street vendors ¹¹³ in Alexandria under the supervision of the governorate, aiming to improve the conditions of street vendors in the Misr station Square, given that the Alexandria Governorate has undertaken work to develop the Misr station Square, which is filled with street vendors. But we have not worked with this association before, or met them in one of the meetings of the Social Solidarity Directorate, or in one of the events organized in cooperation with the Alexandria Governorate.

Section 2: Project Perception

2.1	Are you aware of the Project that will be built in this area?	Yes, we are aware of the project. You (Consultant) have previously shared with us the executive summary of the impact evaluation study, which includes a description of the project, and we were also invited to the consultation session that was held in November 2021.
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¹¹³ The RAP team searched for the association referred to as "The Street Vendors Association", but we did not find this entity. All we found was published news about the cooperation between the Alexandria Governorate and this association. The RAP team contacted the Directorate of Social Solidarity in Alexandria to access the association's data; The name of the association is the Association of Street Vendors in Masr station and El Nabi Daniel, registered No. 3102 in 2012, in addition to the association's address in Muharram Bek area. RAP team visited the association's headquarters 3 times, but found it closed and they were unable to communicate with this association.

Section 2: Project Perception

2.2	<p>Have you been invited and/or attended any Project-related meetings? If so, please provide details of when, where and summary of discussions.</p>	<p>Yes, we were invited to attend the consultation session that was held in November 2021.</p> <p>We, as people from Alexandria, have been hearing about the project for a long time, but we did not find any signs of implementation, and we did not see any development in the transportation means in Alexandria. Rather, things get more complicated every year in terms of traffic problems and the increase in minibuses and tuk-tuks number, which have become the main means of transportation in Alexandria. Is the project actually going to be implemented?</p> <p>This project is very important and will develop many areas in Alexandria. But we must take into account the problems associated with implementation. In some areas of the Abou Qir train the train corridor is narrow; will this area be sufficient for the construction of the metro, or will this result in the removal of some residential buildings? Because this could increase the negative impacts of the project. During the discussions in the consultation session, officials from NAT confirmed that no residential buildings will be removed to construct the project. All what will be removed are the railway facilities, including the stations and mosques built on the railway property's land. I hope it doesn't get any more than that.</p>
2.2	<p>Has The NGO been approached by any community member group regarding any concerns on the Project? If so, please provide details.</p>	<p>No</p>
2.3	<p>What do you think the public perception on this Project is?</p>	<p>Almost all the people in Alexandria are aware of the project. The local media in the governorate publish many news about the Alexandria Metro project. The vast majority of public perception towards the project are positive, but concerns are focused on the traffic problems that we will face until the project is completed. A clear vision of the traffic plans was not presented, and how will traffic problems be dealt with during the construction phase.</p>
2.4	<p>What can you see for the local community are the benefits of this Project and who do you see are the most likely community groups to benefit from the Project? Please provide details.</p>	<p>All community groups will benefit from the project, as this is a public services project, but this can depend on the price of the metro ticket. If the ticket price is high, this project will be unhelpful for groups who are unable to afford the metro as a public transportation.</p>

Section 2: Project Perception		
2.5	What can you see for the local community are the impacts of this Project and who do you see are the most likely to be negatively impacted by the Project? Please provide details.	If traffic issues are not dealt with well during construction, we will all become groups likely to be negatively affected by the project during construction. Also, in the event that the project affects residential buildings, residents of the areas adjacent to the metro corridor will be subject to negative impact from the project.
2.6	Does the NGO have any specific concerns relating to the Project? If so, please provide details.	As I mentioned in the answer to the previous question, the concerns are limited to: <ul style="list-style-type: none"> Potential problems and traffic jams during the construction of the project Displacement of residents from residential buildings adjacent to the metro track.

Consultant response

- The consultant confirmed that a traffic management plan is currently being prepared during the construction phase, in coordination with the Traffic Department in Alexandria Governorate, the Roads and Bridges Directorate and NAT.
- The consultant emphasized that the project design does not require the removal of residential buildings from any area located in the project alignment corridor. The design of the project is limited to ENR properties located in the current track of Abou Qir railway, in addition to 3 plots of land that does not include any residential buildings.

APPENDIX 7: GOVERNMENT DEPARMENTS - CONSULTATION MEETING MINUTES

Consultation Meeting Date / Time	27 April 2022
Local Authority	Alexandria Endowments Directorate (AED)
Government Department	The Department of Mosques in the Alexandria Endowments Directorate
Meeting Venue / Online	The Office of the Director Alexandria Endowments Directorate
Meeting Attendees	<p>His Excellency Sheikh, Undersecretary of the Ministry and Director of the Directorate of Endowments in Alexandria</p> <p>Engineer Ibrahim Abdel Hamid, Director of the Mosques Department in the Directorate of Endowments in Alexandria</p>

Section 1: Background Information

1.1	<p>How is the AED involved in the mosques (13) compensation process? (please describe the process and which departments, experts and tasks are involved/ carried out)</p>	<p>In Egypt, all mosques privately or publicly belong to the Ministry of Endowment. The Ministry of Transport addressed the Ministry of Endowments in May 2020 regarding the removal of (13) mosques built on ENR property and inconsistent with the construction of the new Alexandria Metro project.</p> <p>The Ministry of Endowments has formed a technical committee that includes officials from the Alexandria Endowments Directorate (the body representing the Ministry of Endowments in Alexandria Governorate and therefore the competent body for mosques in the governorate) to examine the mosques to be removed and to estimate the compensation value.</p>
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Section 1: Background Information		
		The value of the final compensation was estimated for 13 mosques (25 million Egyptian pounds).
1.2	Has the AED received the compensation value for the mosques that will be removed for the project?	Yes, NAT deposited the total amount of compensation in the Ministry of Endowments account.
1.3	Up to now which tasks has the AED completed?	<ul style="list-style-type: none"> • Site visits were conducted to examine the mosques to be removed, describing the condition of the mosques, number of floors and area, and the activities carried out in the buildings attached to the mosques; • Estimating the amount of compensation; • Determining appropriate alternatives to replace the mosques that will be removed in light of the available possibilities (the availability of land for the construction of alternative mosques, rehabilitation and expansion of existing mosques); • Directing the Imams of mosques and consulting with them regarding the measures that will be taken to remove mosques; • Develop a plan that includes the expansion/ rehabilitation of (15) existing mosques in the areas surrounding the project path. • Mosques have been evacuated (13 mosques to be removed) and will be demolished by NAT. • The rehabilitation of (9) mosques has been completed, and work is underway to rehabilitate (6) other mosques.
1.4	What is the status of mosques at the present time, are there still activities in them (praying, memorizing the Qur'an, religious lessons...etc)?	At the present, there are no activities taking place in mosques (13) as they were all evacuated after receiving the total compensation in preparation for their removal. At the time of conducting site visits to mosques, there were no activities other than the prayer. All voluntary activities that were carried out in the buildings attached to the mosques, such as memorizing the Qur'an, religious lessons, and study groups, were suspended for a long time due to the spread of Covid 19, and as a precautionary measure, all voluntary activities stopped.

Section 1: Background Information

1.5	Has the AED completed or carried out any consultation prior to or during your work on this project?	Yes, the local communities' members surrounding the mosques were consulted through the Imams of the mosques before evacuating them, in order to notify them of the procedures that will be taken from closing the mosques and then removing them. The available alternatives that will be adopted to compensate the mosques that will be removed were also clarified.
1.6	Has the AED will carry out any consultation to notify the local community of the alternatives that have been implemented?	Yes, the local community members are notified during the Friday prayer period in the existing mosques in the project areas through the Imams of this mosques. They are notified of the developments on a regular basis.
1.7	Does the AED have a grievance mechanism? If so, please provide details.	We receive grievances from community members about matters that we specialize in, including mosques. We receive grievances through the mail (address of the Endowments Directorate in Alexandria/ the address of the Ministry of Endowments in Cairo) by phone, e-government complaints that are transferred to us. There is no specific department concerned with handling complaints, but the complaint is submitted to the His Excellency Sheikh, Undersecretary of the Ministry, and his Excellency transfers it to the competent department to take the necessary action.
1.8	How many grievances has the AED received so far on this Project?	About 3 complaints were received from community members in the areas of Asafra, Victoria and Bachus asking about the reasons for not removing mosques so far, as they were evacuated and prayer rituals stopped, and they became deserted used by some shop and cafe owners to store goods, and some outlaws use them at night to practice some informal activities. Consequently, the buildings of these mosques have become a source of concern for the local community
1.9	Does the AED communicate these grievances to NAT?	Yes, the officials of NAT have been contacted through the Ministry of Endowments, with the aim of knowing when the mosques will be removed. The officials of NAT stated that this will be done as soon as after completing all the studies related to the project and after setting a date for the start of construction.
1.10	Do you have regular meetings with NAT on the Project? If so, what is the frequency of these	No, we do not have regular meetings with NAT regarding the project, but communication is done through official correspondence through the ministry.

Section 1: Background Information

	meetings. If not, how do you co-ordinate Project related work or issues with NAT?	
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Section 2: Compensation Process and Criteria

2.1	Is there national legislation that defines the valuation process to be followed for mosques for this Project? Please provide details.	There are no laws specifying the process of evaluating mosques, but the valuation is done according to the area, the mosque’s structure condition, number of floors, and the activities that take place in the mosque.
2.3	Have alternative mosques already been built?	No, no alternative mosques have been built, due to the lack of land for that, but the rehabilitation of 9 mosques has been completed and work is underway to rehabilitate 6 other mosques as I mentioned before.
2.4	Does any of your work rely on information/data provided from other government departments? If yes, who and what type of information.	Our work does not depend on any other departments, as I explained before all mosques are the responsibility of the Directorate and the Ministry of Endowments only. As a directorate of endowments, we rely only on the Ministry's approvals for implementation and the official correspondence with NAT.
2.5	Does the AED calculate any compensation for mosques users? If so, please provide details.	There are no users of mosques except worshipers, and this is compensated by the rehabilitation and expansion of existing mosque buildings to accommodate more worshipers. Therefore, no compensation was calculated for mosque users.

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Figure 2: photo of the consultation meeting with officials from the Alexandria Endowment Directorate

Consultation Meeting Date / Time	June 11, 2022
NGO Details	Community Development Association - Sharq District
Meeting Venue / Online	At the headquarters of the association in Smouha
Meeting Attendees	Mr. Osama Mustafa, Deputy Director of the Association

Section 1: Background Information		
1.1	What work does the NGO undertake and how is this relevant to the Project?	The Community Development Association is a charitable association that provides social care services to community members in the Sharq District and other Districts in cooperation with the governorate and the Districts heads.
1.2	How long has the NGO been operating in the Project area?	The Community Development Association is a non-governmental Egyptian organization registered at the Ministry of Social solidarity in 1976. Plots of land were allocated from the Alexandria Governorate and the local council ¹¹⁴ for the association as usufructs "Haq Intifaa" ¹¹⁵ in 1977, and they are the lands on which the shops are currently located (the number of shops is 427) in the Victoria and Asafra areas.

¹¹⁴ Local councils are a governmental entity that no longer exists, it has now been abolished, and its work is now done by District Councils.

¹¹⁵ "Haq Intifaa" in the Egyptian law, in Articles 985 to 995 of the Egyptian Civil Code is included in the section on rights subordinated to property rights.

Usufruct properties:

- The right of usufruct is a right subordinated to the right of ownership that gives its owner the authority to use the thing without the need for the mediation of another person.
- The right of usufruct is not perpetual like the right of ownership, but rather it is temporary and ends with the expiry of the term specified for it. If no time has been set for its expiry, it ends with the death of the beneficiary. In all cases, it ends with the death of the beneficiary, even if the date has not expired.
- The usufructuary has the right to use and exploit the thing, which requires that the usufruct thing should not be destroyed by use.

Section 1: Background Information		
1.3	Is the NGO considered to represent a specific impacted group on the Project? If yes, how can the NGO assist or support the Project in communicating with these impacted groups?	<p>Yes, the association represents the tenants of the shops adjacent to the alignment corridor in the areas of Victoria and Asafra, because these shops are rented from the association with usufruct contracts that are renewed annually, and they pay the rent annually. These shops have been affiliated with the association for more than 40 years (from 1978).</p> <p>We communicate with the shops tenants on a regular basis and they are also in contact with us, and we have heard from them that your team has implemented a questionnaire and collected data from some of the tenants of these shops, which raised their fears and concerns that they would be removed at any time for the benefit of the metro project.</p>
1.4	Are there any relevant informal groups or associations (such as a mobile vendors association, marketplace community, etc) that the NGO is aware of that should be consulted on this Project?	<p>We have no idea of the existence of these associations or any other entity representing street vendors. Perhaps if they were registered with the Labour Office (daily workers), the Labour Office would be the entity representing them.</p>

Section 2: Project Perception		
2.1	Are you aware of the Project that will be built in this area?	<p>Yes, we are fully aware of the project, and we follow all the news that is published about the project. We also attended the public consultation session for the project that was held at the Alexandria Governorate headquarters last July 2021.</p> <p>We also heard from the head of Montazh Awal District that representatives of NAT confirmed in one of the sessions that were held for the project that the project will be built on the ENR property, and the shops adjacent to the alignment corridor will not be removed, and that all construction activities will take place within the current railway corridor.</p>

Section 2: Project Perception		
2.2	Have you been invited and/or attended any Project-related meetings? If so, please provide details of when, where and summary of discussions.	<p>Yes, we were invited by the Alexandria Governorate to attend the consultation session for the project that was held last July 2021, as I mentioned before.</p> <p>The discussions were very sharp between the governorate and NAT about alternative transportation for the Abou Qir train, the date of stopping the Abou Qir train and the problems related to preparing traffic plans and the density of streets, in addition to some discussions about the design of stations and the cultural and historical nature of Alexandria Governorate.</p> <p>But we expected that the future urban development associated with the construction of the Alexandria metro would be discussed, whether the areas through which the metro project passes will be re-arranged after the completion of construction. Will this be related to the removal of the shops adjacent to the alignment corridor? bearing in mind that some of these shops are built on the ENR land.</p>
2.2	Has The NGO been approached by any community member group regarding any concerns on the Project? If so, please provide details.	<p>As I mentioned before, we were contacted through the tenants of the shops who deal with us, considering that we are the entity concerned with these shops. Shop tenants have many questions about their situation, will they be removed for the construction of the project? Do the shops conflict with the establishment of the project? Will they be compensated? Will he take into account that most of them have been renting these shops for about 40 years and that these shops represent their main source of income?</p>
2.3	What do you think the public perception on this Project is?	<p>We must emphasize that the establishment of the Alexandria metro project is an important project for all the people of Alexandria, but we should also point out the importance of clarifying all information before construction begins, and will the project result in the removal of the shops adjacent to the metro corridor?</p> <p>This may be an issue for a small group, but it should be taken into account.</p>
2.4	What can you see for the local community are the benefits of this Project and who do you see are the most likely community groups to benefit from the Project? Please provide details.	<p>We do not deny that the project has many benefits that all Alexandrians will benefit from, because it will provide a fast, safe and distinguished means of transportation.</p>

Section 2: Project Perception		
2.5	What can you see for the local community are the impacts of this Project and who do you see are the most likely to be negatively impacted by the Project? Please provide details.	As I mentioned before, the group most likely to be affected by the project are the tenants of the shops adjacent to the metro corridor, as well as the Local Community Development Association - Sharq District because a large proportion of the association’s resources depend on renting shops under the usufruct system, and these resources are what enable the association to manage its development activities.
2.6	Does the NGO have any specific concerns relating to the Project? If so, please provide details.	The only concerns we emphasize are the shops that may be affected by the project in the areas of Asafra and Victoria.

Consultant response

- The design of the project, as well as the Project’s needs for the land parcels that have been identified so far, do not require the removal of any houses or shops adjacent to the alignment corridor, but residents of residential buildings and tenants of shops have been added to the affected given the possibility that they may be affected by the Project at a later stage (construction stage).
- The design of the project is limited to ENR properties located in the current track of Abou Qir railway line, in addition to 3 plots of land, for which the ministerial decree was issued for land acquisition. The shops that will be removed are the shops inside the existing stations, and they have already been notified of this.
- The socio-economic survey was conducted on a random sample of the shops adjacent to the alignment corridor, due to its close proximity to the project site and the possibility of being affected during construction, and therefore it was taken into account during the preparation of the RAP study. But this does not mean that these shops will be removed.
- NAT is the owner of the project and is responsible for compensating all PAPs in accordance with the national law and standards/ requirements of the project's lenders. In the event that any shop will be affected as a result of construction activities, NAT is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.
- In the event that the construction of the project requires the area in which some shops are currently located, the shops will be compensated according to the full replacement cost based on the national requirements of the Egyptian law as well as the international standards and requirements of lenders. A Resettlement Action Plan RAP is currently being prepared for the Alexandria metro project, which includes a Livelihood Restoration Plan and Entitlement Matrix of compensating for all PAPs groups affected and likely to be affected by the project. The RAP is prepared in accordance with national laws and international standards/ requirements for lenders.

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Consultation Meeting Date / Time	March 10, 2022
Local Authority	Egyptian Survey Authority ESA
Government Department	Valuation Department of the Egyptian Survey Authority
Meeting Venue / Online	The Office of the Director of the Valuation Department at the Egyptian Survey Authority
Meeting Attendees	Engineer Ragaa Salem - Director of the Valuation Department at the Egyptian Survey Authority

Section 1: Background Information		
1.1	How is the Valuation Department involved in the land acquisition / resettlement process? (please describe the process and which departments, experts and tasks are involved / carried out, including timescales)	<p>According to Law 10 of 1990, compensation is estimated by a committee formed in each governorate, headed by a representative of the Egyptian General Survey Authority (from the Valuation Department), and the membership of a representative from each of the Agriculture Directorate, the Housing and Utilities Directorate, and the Real Estate Taxes Directorate in the governorate.</p> <p>The compensation is estimated according to the prevailing prices at the date of issuance the land acquisition ministerial decision for the project. The entity concerned with the project will deposit the amount of compensation within a period not exceeding one month from the date of issuance of the decision, and the Survey Directorate (in the governorate concerned with the project) undertakes all procedures for surveying the land.</p> <p>In the Alexandria metro project, a committee to value the project lands was formed from: the director of the valuation department at the Egyptian Survey Authority (the head of the committee and the accredited expert for valuation), the real estate tax directorate in Alexandria, the agriculture directorate in Alexandria, and legal affairs. The names and positions of the members of the committee are considered confidential, except for the head of the committee.</p>

Section 1: Background Information		
		<p>The committee is formed based on the expropriation law 10 of 1990, as I mentioned before, please take into account that all procedures for determining the lands for the project, valuing the lands, surveying and estimating the final compensation are carried out in accordance with the Egyptian law of expropriation for the public benefit.</p> <p>The project owner (MOT/ NAT) who submits a request to the Council of Ministers to issue a decision to expropriate property is the party responsible for depositing the total value of the estimated compensation as well as the valuation and land survey expenses (under the name of the valuation consultant's fees), NAT has not completed this procedure so far.</p>
1.2	Up to now which tasks has the Valuation Department completed?	<p>An evaluation committee was formed, headed by the Director of the Valuation Department from the ESA (Land Acquisition Entity) according to Law No. 10/ 1990 and its amendments by Law 187/2020, Law No. 24/ 2018 and Law No. 1/2015. The Committee is responsible for identifying the properties affected by the Project, as well as confirming the land/ assets location and land/ assets ownership (public/private), in addition to, estimating the initial land price. The compensation is usually determined in accordance with the prevailing price (the market price) for land in the vicinity of the land subject to expropriation.</p> <p>The Committee headed by the ESA issues an expert report that includes the value of land compensation. This procedure is completed for all the private lands included in the Project (the depot lands and the land parcels required for Bab Sharq and Sporting stations).</p> <p>The procedures for calculating the land price will be completed through an valuation survey carried out by a Committee from the Alexandria Survey Directorate (this procedure has been completed for the depot land only) to identify the legal status of affected properties with the property owner.</p>
1.3	How did the Valuation Department carry out these tasks, e.g. asset inventory, census, survey etc?	<p>As I mentioned before, the valuation committee was formed, and the committee conducted site visits to the lands required for the project, and an initial compensation was estimated. An inventory of the assets, structures, and buildings on the lands is carried out through the Alexandria Survey Directorate ASD (It was done for the depot land only and has not started yet for the lands of Bab Sharq and Sporting), and according to the inventory procedures and surveying all the contents of the land, the final and total value of the compensation is estimated, which will be issued by the ASD after completing its work and depositing the required expenses by NAT.</p>

Section 1: Background Information		
1.4	Does any of your work rely on information/data provided from other government departments? If yes, who and what type of information.	Yes, the Directorate of Real Estate Taxes and the Directorate of Survey. Information such as: <ul style="list-style-type: none"> • Is the land state property or private property? • In the case of state property, who is the owner of the land? • Land area according to official records.
1.5	Has the Valuation Department completed or carried out any consultation prior to or during your work on this project?	The Valuation Department, as an entity concerned with valuating private lands, does not carry out any kind of consultations with landowners, but the Valuation Committee collects information on land prices in the same areas in which the lands to be acquired are located in order to estimate the prices of land initially. The compensation is usually determined in accordance with the prevailing price (the market price) for land in the vicinity of the land subject to expropriation. These prices are taken from recorded contracts that form a precedence in the Real Estate and Authentication Offices. It should be noted that the representatives of ESA are experts in evaluating land prices.
1.6	Does the Valuation Department have a grievance mechanism? If so, please provide details.	The Valuation Department is an entity not concerned with receiving grievances or objections to the final valuation from landowners. The ASD is the entity responsible for receiving objections from landowners to: the legal status, the price of land, etc.), they are entitled to raise a grievance with the ASD office in particular the focal point responsible for grievances within 15 days of the land acquisition decision. Both the landowners and users are entitled grievance related to the valuation result.
1.7	How many grievances has the Valuation Department received so far on this Project?	As I mentioned in the previous question, the Valuation Department is not responsible for receiving any grievances.
1.8	Does the Valuation Department communicate these grievances to NAT?	Since the Valuation Department does not receive any grievances, therefore, we do not take this procedure with NAT

Section 1: Background Information

1.9	Do you have regular meetings with NAT on the Project? If so, what is the frequency of these meetings. If not, how do you co-ordinate Project related work or issues with NAT?	We do not communicate through regular meetings, but through official correspondence, and if necessary, a meeting will be held, for which we will prepare, and most likely it will be in the office of the Director of the Valuation Department at the Egyptian Survey Authority.
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Section 2: Valuation Process and Criteria

2.1	Is there national legislation that defines the valuation process to be followed for land expropriation for this Project? Please provide details.	The valuation process is carried out according to the market price prevailing in the area at the time of the expropriation procedures (this is determined by the law).
2.2	What data inputs (such as asset inventory, census, etc) are required for the valuation of land for the Project, and what is the source of this data?	Inventorying the assets and buildings on the lands and determining their value is the responsibility of the ASD, and their value is included in the total estimated compensation for each land owner.
2.3	Does the Valuation Department collect the above inputs themselves, or does the department rely on another agency? If the department relies on other agencies, please provide details.	This is the responsibility of the ASD.

Section 2: Valuation Process and Criteria		
2.4	Does the valuation process use a specific list of unit prices for certain affected immovable assets (e.g. structures, trees, fences, etc) to calculate compensation that are defined by government agencies and updated annually, e.g. cost of building materials, affected crops/trees, etc? If so, please provide details.	In the case of estimating compensation for crops and trees, this is done according to the Latest prices list of crops and trees issued by the Agriculture Directorate and approved by the Ministry of Agriculture.
2.5	Does the Valuation Department have any requests for compensation for unviable land for the Project? If so, please provide details and describe how the eligibility criteria is verified for such compensation.	No
2.6	How is the valuation calculated for Project-affected trees?	This is done according to the Latest prices list of crops and trees issued by the Agriculture Directorate and approved by the Ministry of Agriculture. This is done through the ASD in coordination with the Alexandria Agriculture Directorate.
2.7	Does the valuation department calculate any costs for land users (e.g. informal users of land)? If so, please provide details.	The Valuation Department is only concerned with evaluating the prices of land/assets owned/ used by formal private property, and is not concerned with calculate any costs for informal users of land/ assets.
2.8	Does the valuation department complete any valuation for the shops and/or mobile vendors? If so, please provide details.	The shops are located on land owned by the Egyptian National Railways ENR, and it is not our responsibility or ASD responsibility. All ENR properties will be listed by the ENR Property Department, as it is the owner of the official documents for this. It is also concerned with the occupants/ informal users of the lands owned by ENR.

ALEXANDRIA REGIONAL METRO – ABOU QIR to MISR STATION

Tender No. 13768597 – EPC-1 Engineering /Detailed Design, Procurement, Construction, Testing and Commissioning of the Works



Figure 3: Photo of the consultation meeting with the director of the valuation department at the Egyptian Survey Authority

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Consultation Meeting Date / Time	March 9, 2022
Local Authority	
Government Department	Alexandria Survey Directorate ASD
Meeting Venue / Online	Office of the Alexandria Survey Directorate Director
Meeting Attendees	<p>Engineer Safaa Ahmed - Director of the Directorate</p> <p>Engineer Al-Hassan Saber - the engineer surveying the lands of the Alexandria Metro Project</p>

Section 1: Background Information		
1.1	How is the Survey Directorate involved in the land acquisition / resettlement process? (please describe the process and which departments, experts and tasks are involved / carried out, including timescales)	Alexandria Survey Directorate is responsible for conducting the survey of the private lands included in the expropriation decree and issuing a list that includes compensation value, the specified area planned for expropriation, the names of the landowners.
1.2	Up to now which tasks has the Survey Directorate completed?	The procedures for surveying the land of El Nahas company have been completed
1.3	How did the Survey Directorate carry out these tasks, e.g. asset inventory, census, survey etc?	<p>Been completed:</p> <ul style="list-style-type: none"> • Surveying procedures • Issuance of cadastral maps of the land

Section 1: Background Information		
		<ul style="list-style-type: none"> Apparent owners list
1.4	Does any of your work rely on information/data provided from other government departments? If yes, who and what type of information.	<p>yes</p> <p>Real estate taxes, a department under the Survey Directorate</p>
1.5	Have you completed or carried out any consultation prior to or during your work on this project?	No, It's not my job
1.6	Does the Survey Directorate have a grievance mechanism? If so, please provide details.	Where the landowner requires further information with regards to the land acquisition requirements on subject land and other property (the legal status, the price of land, etc.), they are entitled to raise a grievance with the ASD office in particular the focal point responsible for grievances within 15 days of the land acquisition decision. Both the landowners and users are entitled grievance related to the valuation result.
1.7	How many grievances has the Directorate received so far on this Project?	Not all procedures have been completed, and therefore no objections/grievances have been received so far
1.8	Does the Survey Directorate communicate these grievances to NAT?	Follow-up with the NAT is carried out on a regular basis, but please take into account that all these procedures are carried out only for private landowners listed in the expropriation decision, otherwise it is not within the competence of the Survey Directorate
1.9	Do you have regular meetings with NAT on the Project? If so, what is the frequency of these meetings. If not, how do you co-ordinate Project related work or issues with NAT?	We do not communicate through regular meetings, but through official correspondence, and if necessary, a meeting will be held, for which we will prepare, and most likely it will be in Alexandria in the Survey Directorate

Section 2: Census / asset inventory Information needed for the Socio-economic Surveys				
2.1	Total number and land area (m ²) of land parcels to be expropriated by the Project (total and breakdown for public and private lands separately).	Total (m ²)	Private Land (m ²)	Public Land (m ²)
			We were only addressed to the El Nahas land and its area 204,436 m ²	It's not my job
2.2	Number, type and area (m ²) of residential land plots to be expropriated (including number of houses), if any.	We have not been contacted to conduct a survey and evaluation of any residential lands or houses		
2.3	Number, type and area (m ²) of business land plots to be expropriated (with indication of which stations they are located in).	We have not been contacted to conduct a survey and evaluation of any of business land plots to be expropriated		
2.4	Number, type and area (m ²) of business land plots to be expropriated (with indication of which stations they are located in).	We were only addressed to the El Nahas land and its area 204,436 m ²		
2.5	Number, type and area (m ²) of public land plots to be expropriated and what they are currently being used for, and if any formal or informal use by PAPs (also please provide if transfer arrangements are complete or usufruct agreements are in place for these lands, if available please provide documented evidence).	None, I repeat, we have only been contacted so far to the El Nahas land		
2.6	Number, type and area (m ²) of agricultural land plots to be expropriated, if any.	There is no agricultural land		

Section 2: Census / asset inventory Information needed for the Socio-economic Surveys		
2.7	Current ownership details (including names and the number of owners each parcel has) of all impacted land parcels – owned by person, business or government department and its use.	<p>The land of El Nahas Company is owned by:</p> <ul style="list-style-type: none"> The Egyptian Company for Metallurgical Industries (El Nahas company). Heirs of the Jawish family Heirs of the Buhairi family <p>A list has not been issued that includes the names of all the heirs who are entitled to compensation, this list will be prepared and the compensation value due for each heir after NAT deposits the total value of the land compensation in the ASD bank account.</p>
2.8	Number of land parcels and land area that is formally rented under a lease agreement (throughout the entire route) at this time, if any, and its use.	<p>The ASD was not notified of any leased/ rented lands. We were only notified of the El Nahas land survey, which is owned by three parties as mentioned before.</p>
2.9	Number of land parcels that may potentially be leased / rented for the project for temporary use during construction.	<p>The ASD is concerned only with the private lands included in the ministerial decision of expropriate property. What we have been notified of does not include be leased/ rented lands.</p> <p>We do not have an answer or information for this question, and it may not be within our competence. This question can be directed to NAT.</p>
2.10	Number and land area (m²) area of any permanent and/or temporary easement areas (throughout the entire route), if any, and any details that are currently available.	<p>As I mentioned before, we were only addressed to the El Nahas land and its area 204,436 m²</p>
2.11	Area of additional Land (m²) to be expropriated due to redundancy (m²), if any.	<p>Another ministerial decision was issued for the Alexandria metro Project in November 2021 that includes two plots of land in Bab Sharq and Sporting areas, but we have not yet been notified by the Egyptian Survey Authority in Giza until we start the procedures for surveying the land and determining the apparent owners of the lands.</p>

Section 2: Census / asset inventory Information needed for the Socio-economic Surveys		
2.12	Number of project-affected persons (PAPs) both formal and informal users providing details of their use of the land on the Bab Sharq Station, Sporting Station and depot land.	As I mentioned in the previous question, we haven't started to define that.
2.13	Number of structures (primary and other structures, e.g. barns, well, etc) to be expropriated by the project, if any.	El Nahas Land includes some buildings/ structures that are not currently in use, including: a foil factory, warehouses, facilities for workers, a training centre for driving trains, and stadiums (owned by El Nahas Company). All details of the contents of the land, including buildings and structures, will be published in the detailed report that will be sent to NAT. The total compensation will include compensation for any buildings / structures located in the land, and the compensation will be paid to the owner.
2.14	Any demographic information on PAPs such as age, sex, family size, births and deaths.	The ASD is not concerned with this type of information, we are concerned only with land ownership documents, the number of owners and their names according to the ownership documents so that we can provide compensation to the original owners.
2.15	Any related social and economic information, including ethnicity, health, education, occupation, income sources, from among the affected people (both owners of land and users of land)?	The ASD is not concerned with this type of information, we are concerned only with land ownership documents.
2.16	Number and type of vulnerable people affected by the project, including households headed by women or children, people with disabilities, the extremely poor, the elderly, groups that suffer social and economic discrimination (including indigenous peoples and minorities) and mobile vendors.	The ASD is not concerned with this type of information, we are concerned only with land ownership documents, as I mentioned before.

Section 2: Census / asset inventory Information needed for the Socio-economic Surveys		
2.17	Do you conduct any valuation studies for the shops in the stations covered under the Project? If so, please can you provide details.	No
2.18	If not available at the moment, when can this information be provided to us?	The shops in the stations are owned by the Egyptian National Railways ENR, and are not our responsibility. All the ENR properties located in the Project will be listed by the ENR Property Department, because they are the party that owns the official documents for this. The ASD is concerned only with private lands.



Figure 4: Photo of the consultation meeting with the director of the ASD and the engineer surveying the lands of the Alexandria Metro Project

APPENDIX 8: FGDS WITH WOMEN ONLY

Consultation Meeting Date / Time	12/05/2022, 12pm- 2pm and 7pm- 8:30 Local Time
Meeting Venue / Online	RAP team held 2 FGDs with women only. The first FGD was held in one of the celebration halls (Princess Hall) in Bakoos area near Ghebrial station, the second FGD was held in the Al Zahiria area - Ezbet Al-Safih in the street adjacent to the alignment corridor.
Meeting Attendees	<p style="text-align: center;">First FGD:</p> <ol style="list-style-type: none"> 1. (14) women from Ghebrial and Bakoos areas; 2. Dr Anan Mohamed Ali, RAP Team - ECS; 3. Mona Abu Bakr, RAP Team – ECS. <p style="text-align: center;">Second FGD:</p> <ol style="list-style-type: none"> 1. (19) women from Al Zahiria area; 2. Dr Anan Mohamed Ali, RAP Team – ECS; 3. Mona Abu Bakr, RAP Team – ECS.

FGDs Minutes

Introduction

RAP team presented an introduction about the Alexandria metro project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness with the project, but made it clear that they had many concerns and questions that they needed to answer clearly, because this would determine their perceptions on the Project.

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The attendees presented their concerns and questions and the RAP team responded according to the available information. The following table shows the topics raised during the FGDs and the RAP team's response to them.

	TOPIC	RESPONSE
1	<p>The project's land needed (expropriation of houses)</p> <p>We do not have clear information about the project. Will the houses adjacent to the project path be removed? Does the plan to establish the project will require the removal of houses? Will the land of the houses be expropriated/ what is our situation in the event that houses demolitions? What are the procedures that will be taken if any damage occurs to a house as a result of construction work?</p> <p><i>It should be considered that we do not have any alternatives to move, as these houses in which we live are the only housing for us, and their demolition and removal for the benefit of the project means our homelessness.</i></p>	<p>The final design of the project does not include the removal of any houses. The project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any houses.</p> <p>In the event that any house is damaged as a result of construction activities (excavation), the National Authority for Tunnels is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p> <p>Regarding the actions to be taken in the event of any damage to any house as a result of construction work; The house will be inspected and examined by a technical committee to assess the damage, and the measures that must be taken for the safety of the residents, bearing in mind that these measures are taken very quickly.</p> <p>Cash compensation or in-kind support will be provided to fully repair the damage. This will be assessed and estimated by specialists (technical committee), with follow-up remedial action taken by the Contractor.</p>

TOPIC	RESPONSE
	<p>In the event that houses are damaged and require the relocation of PAPs, compensation at full replacement cost for any damages to these assets will be provided, or a rental allowance will be provided for the duration of the relocation, if needed.</p> <p>The construction contractor is responsible for determining the risks that may arise from the construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p> <p>What information do you want to know? What are the best channels to share information with you?</p>
<p>We would like to know the following:</p> <ul style="list-style-type: none"> - Notify us of construction dates well in advance of its start, especially in areas that will have excavations, - In the event that the construction of the project affects the existing facilities (water connections, electricity, sewage, telephones), we must be notified before that, - Will there be a direct communication channel for us on the construction site? - How to communicate with those responsible for the project in case of damage from any construction activities 	<p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p>Grievance Channels</p> <p>The following are the main channels through which grievances will be received:</p> <ul style="list-style-type: none"> • Engineering representative on-site: <u>It has not been identified yet</u> • 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

	TOPIC	RESPONSE
		<p>People can also submit questions / comments related to the project through the project's email address created specifically for the project, alexandriametro.nat@yahoo.com.</p> <p>All required information raised in today's discussion will be taken into account and shared with the project officials from NAT.</p>
2	<p>Actions to be taken by NAT for women (metro users) during operation</p> <p>Will a metro car be reserved for women or not?</p>	<p>NAT is currently adopting several measures to ensure the safety of all passengers for the Cairo Metro Line. Where all stations have surveillance cameras. The Cairo Metro Line 3 also includes surveillance cameras in all its metro cars, and the Alexandria metro line is expected to do the same.</p> <p>There are numerous grievance channels in place for passengers as well, including a hotline, WhatsApp support and Facebook page. Additionally, there are support booths for general grievances located across the line in the stations.</p> <p>The same measures will be taken for the Alexandria metro, while studying the most effective measures to protect the safety of women passengers on the metro, which may include allocating a car for women.</p>
3	<p>Railway alternatives during construction</p> <p>what is the alternative transportation for the train during construction?</p>	<p>NAT in cooperation with the Alexandria Public Transportation Authority, has studied the best alternatives that are provided before the train stops working. Indeed, alternative transportation has been provided, which is currently being tested, and work has begun on the streets of Alexandria in the areas surrounding the Abou Qir train track.</p>

	TOPIC	RESPONSE
4	<p>Is the project serious or not, because it has been postponed more than once?</p> <p>what is the start date for project implementation?</p>	<p>Yes, the project is serious, and almost all the studies required to be prepared before construction have been completed.</p> <p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which requires that the study be prepared and compensation implemented before any project construction activities begin.</p>
5	<p>How high is the metro above the surface (viaduct area)?</p>	<p>The height of the metro above the surface in the viaduct area is 6 m, according to the data received from the engineering consultant for the project (SYSTRA).</p>
6	<p>At the present, a brick wall separates our houses from the railway corridor. this brick wall is used to collect waste which collected from houses and has become a source of unpleasant odour and insects, in addition to the fact that the railway corridor is used during the night to sell and use drugs by some outlaws.</p> <p>what are the measures that will be taken to restructuring the area under the viaduct?</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the project and the safety and security of the viaduct.</p> <p>All your comments and recommendations that were raised in today's discussion will be shared with NAT officials, to be taken into account whenever possible, in line with the requirements of the construction and operation of the project.</p>

TOPIC	RESPONSE
<p>will the brick wall separating the houses and the railway corridor be removed after the metro construction?</p> <p>we hope that the brick wall will be removed and the area under the viaduct restructured so that it becomes an access for the community. we are currently suffering in case of needing an ambulance to enter the area, as well as from the endless accumulation of waste and the prohibited activities that take place inside the railway corridor at night.</p> <p>as residents of the area, the construction of the metro will be of great benefit to us, not only as a safe and clean means of transportation, but also because it will save us from many of the problems we suffer from at the present.</p> <p>please take the restructuring of the area under the viaduct into consideration as a request from residents of Ghebrial and Al Zahiria areas.</p>	



Figure 5: Photos of the FGDs with women only

APPENDIX 9: FGDS WITH SHOP TENANT NEAR TO THE ALIGNMENT

Consultation Meeting Date / Time	20/04/2022, 7:30pm- 9pm Local Time, and 14/05/2022, 12pm- 1:30pm Local Time
Meeting Venue / Online	RAP team held 2 FGDs with the shop tenants adjacent to the Project corridor. The first FGD was held in one of the shops in Victoria area, the second FGD was held in the office of one of the shop tenants in Asafra area near to the alignment corridor.
Meeting Attendees	<p style="text-align: right;">First FGD:</p> <ol style="list-style-type: none"> 1. (8) shop tenants from Victoria area; 2. Dr Anan Mohamed Ali, RAP Team - ECS; 3. Mona Abu Bakr, RAP Team – ECS. <p style="text-align: right;">Second FGD:</p> <ol style="list-style-type: none"> 1. (14) shop tenants from Victoria and Asafra areas; 2. Dr Anan Mohamed Ali, RAP Team – ECS; 3. Mona Abu Bakr, RAP Team – ECS.

FGDs Minutes

Introduction

RAP team presented an introduction about the Alexandria metro project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness that they are being consulted, because they have a lot of concerns and questions that they need to answer. They are worried because they are not aware of the decisions that will be taken in the next stage towards their shops.

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The attendees presented their concerns and questions and the RAP team responded according to the available information. The following table shows the topics raised during the FGDs and the RAP team's response to them.

	TOPIC	RESPONSE
1	<p>The project's land needed (expropriation of shops area)</p> <p>Will the shops be removed for the construction of the metro project?</p> <p>Why was a socio-economic survey of some shop tenants? Are these sim shops removed and compensated?</p> <p><i>We have been renting these stores for a long time, some of them have been renting for about 40 years. The vast majority of us these shops represent our only source of livelihood.</i></p>	<p>The final design of the project does not include the removal of any shops adjacent to the Project corridor. The project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any shops adjacent to the Project corridor.</p> <p>The shops that will be removed are the shops inside the existing stations, and they have already been notified of this.</p> <p>The socio-economic survey was conducted on a random sample of the shops adjacent to the alignment corridor, due to its close proximity to the project site and the possibility of being affected during construction, and therefore it was taken into account during the preparation of the RAP study. But this does not mean that these shops will be removed.</p>
	<p>What will happen if the construction activities affect one of the shops, what are the procedures that will be taken in this case?</p>	<p>In the event that any shop will be affected as a result of construction activities, NAT is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p>

TOPIC	RESPONSE
	<p>Regarding the actions to be taken in the event of any damage to any shop; the shop will be inspected and examined by a technical committee to assess the damage, and appropriate compensation for all damages will be assessed.</p> <p>Cash compensation or in-kind support will be provided to fully repair the damage. This will be assessed and estimated by specialists (technical committee), with follow-up remedial action taken by the Contractor.</p> <p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p>The construction contractor is responsible for determining the risks that may arise from the construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p>
<p>Is it likely that the construction of the project will require the area on which the shops are currently located? What actions will be taken in this case?</p> <p><i>Please bear in mind that many of these shops are not owned by ENR, but are owned by the Community Development Association in Alexandria, and we rent the shops from them with a contract that is renewed annually and pay the rent for the whole year in advance.</i></p>	<p>In the event that the construction of the project requires the area in which some shops are currently located, the shops will be compensated according to the full replacement cost based on the national requirements of the Egyptian law as well as the international standards and requirements of lenders, NAT as the owner of the project is obligated to do so.</p> <p>Replacement cost is the market value as determined by an expert property, plus associated transaction costs; example labour cost for building structures or other fixed assets, plus transaction costs.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which</p>

	TOPIC	RESPONSE
		<p>requires that the study be prepared and compensation implemented before any project construction activities begin.</p> <p>The RAP includes all affected groups by the project as well as those who may be affected at a later stage.</p>
2	<p>We understood from you today, by presenting a description of the project, that the area in which the shops are located, the metro track will be elevated at a height of no less than 6 m; Does this mean the possibility of restructuring the area under the metro alignment (viaduct) and removing shops?</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the project and the safety and security of the viaduct.</p> <p>All your comments and concerns that were raised in today's discussion will be shared with NAT officials, to be considered, in line with the requirements of the construction and operation of the project.</p>
3	<p>Consultation activities with shop tenants</p> <p>We were not consulted except by the consultant who invited us to attend the public consultation session about a year ago, but the National Authority for Tunnels did not consult with us.</p> <p>Does this mean that the shops will not be removed?</p> <p>Why do we not have enough information about the project, and its land needs? Will we be notified in case the shops are demolished? We need to know more information on a regular basis, who will contact us for that?</p>	<p>A stakeholder engagement plan has been prepared for the Alexandria metro project, which includes a program for consultation with all parties involved in the project, including shop tenants. The consultation process is an ongoing process during the various stages of the project life.</p> <p>Please specify the information you would like to receive, and the best communication channels for obtaining information.</p>
	<p>We would like to know the following:</p>	<p>The following are the main channels through which grievances will be received:</p>

	TOPIC	RESPONSE
	<ul style="list-style-type: none"> - Notify us of construction dates well in advance of its start, - How to communicate with those responsible for the project in case of damage from any construction activities - In the event that the project needs to remove some shops, the tenants of the shops must be notified sufficiently in advance, and determine the compensation that is commensurate with the value of these shops, and give logical reasons for removing these shops from others. <p>The best channel of communication is direct communication with shop tenants, as well as through the Community Development Association and ENR, which are the parties that have been contracted with.</p>	<ul style="list-style-type: none"> • Engineering representative on-site: <u>It has not been identified yet</u> • 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 <p>People can also submit questions / comments related to the project through the project's email address created specifically for the project, alexandriametro.nat@yahoo.com.</p> <p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p>All required information raised in today's discussion will be considered and shared with the project officials from NAT.</p>
4	<p>what is the start date of the project implementation?</p> <p>Has a date been set for the train stopping and the start of construction activities inside the corridor?</p> <p><i>Please keep in mind that the back walls of the shops are the railway fence at the moment, the shops must be protected from the impact of the construction activities.</i></p>	<p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>NAT confirmed, during the preparation of the ESIA, that the construction contractor is responsible for protecting the shops adjacent to the alignment corridor from the impact of construction activities, and that the project design does not require removing the shops adjacent to the alignment corridor.</p>



Figure 6: Photos of the FGDs with shop tenant