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Assessment for Cairo Metro Line 2
Rehabilitation:

Phase III Stakeholder Engagement Plan (SEP)

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Glossary of Terms and Abbreviations

AIP	Access to Information Policy
CML2	Cairo Metro Line 2
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
ECM	Egyptian Company for Metro
EEAA	Egyptian Environmental Affairs Agency
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESAA	Environmental and Social Audit and Assessment
ESHS	Environmental, Social, Health, and Safety
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
GIP	Good International Practice
GRM	Grievance Redress Mechanisms
IFI	International Financial Institutions
ILO	International Labour Organization
MoT	Ministry of Transport
NAT	National Authority for Tunnels

1 Introduction

The Stakeholder Engagement Plan (SEP) describes the effective method for National Authority for Tunnels (NAT) to interact and consult with identified stakeholders for the planned upgrade of the Cairo Metro Line 2 (CML2). NAT is committed, in addition to full compliance with all Egyptian Environmental Impact Assessment (EIA) regulations, to comply with the environmental and social Performance Requirements (PRs) of the European Bank of Reconstruction and Development (EBRD), and Environmental and Social Standards (ESSs) of the European Investment Bank (EIB). The purpose of this document is to define the appropriate approach to be taken for consultation with concerned parties during the CML2 Project lifetime.

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

The SEP is a living document, which will be regularly updated during and after each phase of the Project. The engagement undertaken during the initial phases will be used to define the engagement during the later stages of the Project. The document outlines the methods, procedures, policies and actions to be undertaken by NAT, and where appropriate the operator of Line 1, the Egyptian Company for Metro Management & Operation (ECM) and/or the Project Contractors, to inform stakeholders in a timely manner of the potential impacts and benefits of the project.

1.1 Project Overview

EcoConServ Environmental Solution has been appointed as an Environmental and Social Consultant for the **Environmental and Social Audit and Assessment (ESAA)** of Cairo Metro Line 2 (CML2) for its proposed Renewal and Upgrade Project, herein referred as "the Project". Under the Ministry of Transport (MoT), the National Authority for Tunnels (NAT) is expected to receive financial support from the European Investment Bank (EIB) and the European Bank for Reconstruction and Development (EBRD) for the planned upgrade of the CML2. In order to improve the comfort, capacity, and safety of CML2 to its existing and prospective passengers, the rehabilitation project will involve improvement to a range of elements, including; the power supply, third rail, rolling stock systems, telecommunications, signalling, control systems, electromechanical components (controls and alarms), workshop and stabling area, and track works.



Figure 1 Metro Train on Line 2

Among the Greater Cairo Metro Network, CML2 has been in operation since 1996 and one of the three metro lines that provides important affordable mobility to commuters and is one of the most highly utilized metros in the world with around 2.2 million passengers using the current 3 lines every day. CML2 extends from Shubra

El Kheima to El Mounib with a total length of 21.5 km including 20 stations (12 underground, 6 surface and 2 elevated stations), this line was implemented in five successive phases:

Phase 1: “Shubra El Keima Metro Station - Mubarak Metro Station” with a total length of 8 km and this phase was inaugurated in October 1996.

Phase 2: “Mubarak Metro Station- Sadat Metro Station” with a total length of 3 km and this phase was inaugurated in September 1997.

Phase 3: “Sadat Metro Station - Cairo University Metro Station” with a total length of 5 km and this phase was inaugurated in April 1999.

Phase 4: “Cairo University Metro Station – Omm El Misryeen Metro Station” with a total length of 2.7 km and this phase was inaugurated in October 2000.

Phase 5: “Omm El Misryeen Metro Station - Mounib Metro Station” with a total length of 2.6 km and this phase was inaugurated in January 2005.



Figure 2 Cairo Metro System

2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

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

- Regulatory Requirements of Egypt; and
- EIB Standard on Stakeholder Engagement of the Environmental and Social Standards (ESS 10)
- EBRD's policy requirements on information, disclosure, stakeholder engagement, & meaningful consultation (PR 10).

2.1 Regulatory Requirements of Egypt

Throughout work tenure, workers and employees will be made aware of rules and regulations that affect their status, their duties, and their rights under Labour Law 12/2003. Disclosure of information will be continuously communicated with workers in a culturally appropriate manner. Gender-related issues will also be considered; Article 95 indicates disseminating a copy of the Women Employment System in case of five female workers or more in the workplace. In addition, information regarding working regulations for children under the age of 16 should be communicated with workers according to Article 102.

2.2 Standard of the European Investment Bank

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

- Establish and maintain constructive dialogue between the promotor, affected communities and interested parties throughout the Project lifecycle;
- Ensure all stakeholders are properly identified and engaged;
- Engage stakeholders throughout the Project lifecycle in line with the principles of public participation, non-discrimination and transparency; and
- Ensure that all stakeholders are given equal opportunity and voice, regardless of status.

In addition, consultation activities will follow the EIB Guidance note to promoters on environmental and social performance, in EIB-financed operations in response to the COVID-19 outbreak crisis Annex 4 – Stakeholders engagement May 2020¹.

2.3 EBRD's Requirements for Stakeholder Engagement

The commitment of EBRD has been shown in developing the Environmental and Social Policy in (ESP) as of April 2019 to advocate for environmental and social sustainable development through achieving many aspects; one of those aspects considers stakeholder engagement and information disclosure a profound means for creating a successfully viable project. The Performance Requirement no. 10 necessitates meaningful consultation and transparency communicating with stakeholders throughout the different phases of the project for a better quality of work.

Information Disclosure PR 10 aims to facilitate the establishment of an ongoing relationship between clients and relevant stakeholders. Information Disclosure is an essential component of sound international practices, and enables the success of projects in collaboration with stakeholders and community members. As such, clients are to identify and engage with relevant stakeholders and transparently outline potential environmental and social risks, as well as disclose other relevant project information.

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

- **Stakeholder identification and analysis**, which requires clients to outline and document stakeholders who are likely to experience project impacts.

¹ https://www.eib.org/attachments/covid19_guidance_note_to_promoters_annex4_stakeholders_engagement_en.pdf

- **Stakeholder engagement planning**, which describes engagement activities planned for identified stakeholders, as well as the information to be disclosed in a manner that is deemed appropriate for the characteristics of the identified community.
- **Disclosure of information**, which requires that clients transparently disclose potential environmental and social risks through appropriate means in which identified stakeholders are informed of the time and location prior.
- **Meaningful consultation**, a tailored process based on a project's expected impacts and community interests, promoting stakeholder feedback and consultation opportunities that are culturally appropriate and inclusive.
- **Grievance mechanism**, the process of establishing a free and fair channel for stakeholders to submit concerns, provide feedback and receive timely and efficient support from clients.

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

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

2.4 Good International Practice

The key principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is understandable and tailored to the needs of the target stakeholder group(s)
- Sharing information in advance through consultation and decision-making activities
- Providing culturally appropriate and accurate information that is easily accessible for stakeholders
- Respecting local traditions and languages in the decision-making processes
- Including a wide variety of views, that represent women and men of different ages as well as vulnerable and/or minority groups
- Establishing processes that are free of intimidation or coercion
- Setting clear mechanisms for responding to people's concerns, suggestions, and grievances
- Incorporating, where appropriate and feasible, feedback into project or programme design, and reporting back to stakeholders.

These principles will be reviewed and adopted by NAT as the project progresses.

² [https://www.google.com/search?q=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+\(1\).pdf&rlz=1C1GCEU_enEG822EG824&og=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+\(1\).pdf&ags=chrome..69i57.4794i0j7&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+(1).pdf&rlz=1C1GCEU_enEG822EG824&og=1264-Stakeholder-engagement-covid-19-briefing-note-22-April+(1).pdf&ags=chrome..69i57.4794i0j7&sourceid=chrome&ie=UTF-8)

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders are considered any person, groups of people, or entities that;

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

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

Table 1 Identified Stakeholders

Stakeholder Category		Role/ Importance of the Stakeholder to the Project
Primary Stakeholders		
Potentially Affected CML2 users Potential Affected Communities along the Route of CML2	CML2 users	<ul style="list-style-type: none"> • Metro users are more likely to be adversely affected by social impacts; Given that they are directly impacted by the suspension/ change of the metro service and they are the direct beneficiaries from the metro project.
	Young people (job seekers)	<ul style="list-style-type: none"> • Constitute the largest category of metro users and so are strongly vested. • Residents of local communities will also potentially benefit from job opportunities or other positive economic outcomes
	Vulnerable groups Women Elderly and disabled persons	Given their vulnerable status, they might be more affected by the project's positive or negative impacts
Project lender	European Investment Bank (EIB), European Bank for Reconstruction and Development (EBRD)	<ul style="list-style-type: none"> • It is the financing and regulating entity • Set the environmental and social performance requirements for the project to follow.
Project Owner Ministry of Transportation	National Authority for Tunnels (NAT)	<ul style="list-style-type: none"> • Project owner, responsible for overall implementation and subcontracting, and handling grievances related to the upgrade works
	Egyptian Company for Metro (ECM)	<ul style="list-style-type: none"> • Responsible for running the operations of the Metro, and handling related grievances
Workers in CML2 Stations	Station chiefs, stationmasters, and their assistants - Head of tickets' offices and cashiers Drivers	<ul style="list-style-type: none"> • Given that the project takes place in their work place, they might be more affected by its positive or negative impacts
	Services Security and hygiene companies operating in the stations and administrative offices	<ul style="list-style-type: none"> • Responsible for cleaning the stations and establishments for NAT, • Responsible for security at ticket gates and station entrances, • Responsible for the cleanliness of stations, facilities and platforms

Stakeholder Category		Role/ Importance of the Stakeholder to the Project
Governmental Institutions	The Ministry of Electricity	<ul style="list-style-type: none"> Responsible for the electrical power required to operate the metro and its control units
	Ministry of Environment - Egyptian Environmental Affairs Agency (EEAA)	<ul style="list-style-type: none"> Reviewing and approving ESIA's as well as following up on the implementation of the Environmental Management Plan is done according to environmental standards.
	The Environmental Office within the Governorate	<ul style="list-style-type: none"> It is responsible for monitoring the compliance to environmental requirements.
	The Ministry of Communications	<ul style="list-style-type: none"> Responsible for permits for the communications equipment used between the metro drivers and control units
	Cairo Governorate	<ul style="list-style-type: none"> Responsible for supporting the project by providing its various needed permissions
	Ministry of Health Ambulance Authority	<ul style="list-style-type: none"> Responsible for the continued presence of ambulances and the maintenance of the emergency health unit at the underground stations Provide ambulance services for metro passengers in emergency situations at all other stations
	Ministry of Interior	<ul style="list-style-type: none"> Responsible for policing the metro stations and their platforms
	Civil Protection Departments	<ul style="list-style-type: none"> Responsible for safety in the stations and the corresponding establishments for operations and control
	Arab Organization for Industrialization	<ul style="list-style-type: none"> The Egyptian entity responsible for manufacturing metro vehicles and its spare parts
Contractors	Main Contractor (not identified)	<ul style="list-style-type: none"> Responsible for managing the engineering, procurement and construction works for the project
	Contractor workers during construction	<ul style="list-style-type: none"> Responsible for construction, operation, and compliance with company policy, occupational health and safety standards and codes of conduct.
Secondary Stakeholders		
Academia	Research Centres Universities Consultancy firms	<ul style="list-style-type: none"> Research centers, consultancy firms, and experts and universities are academic and technical entities, which support in providing technical training to various target groups.
Service Providers	Traders Local business owners	<ul style="list-style-type: none"> Providing workers with food, potable water, and other needed services and amenities, especially during the construction period.
Media	Local and Online Media	<ul style="list-style-type: none"> Sharing information about the project to the community of Assuit in specific, and the whole country.
Civil Society	Local NGOs in the regional level, as well as the local Community Development Association	<ul style="list-style-type: none"> Organizations with direct interest in the project and which may have useful data or insight into local issues of relevance to the project. These organizations can also sharing information with the community.

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

4 STAKEHOLDER ENGAGEMENT PROGRAM

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

4.1 Previous Stakeholder Engagement Activities

No public consultation activities have previously taken place for Cairo Metro Line 2, either in the construction phase or in the operational phase. Consultation activities with stakeholders from the concerned parties of the project are limited to:

- Periodic meetings. NAT and ECM participate in periodic meetings with key stakeholders such as the Ministry of Electricity, Ministry of Interior and Ministry of Finance, as well as with managers of relevant departments such as Public Relations and Media. These meetings focused on consultation among the various stakeholders responsible for decision-making and management, discussing various problems, and taking necessary measures to resolve issues.
- Cooperation agreements between some ministries/ and authorities and the NAT Public Relations and Media Department; Such as the Ministry of Health and the National Council for Women. In order to conduct health awareness campaigns in metro stations. As well as the e-government complaints system through the Council of Ministers.
- In addition, NAT relies on disclosures information through the Public Relations and Media Department, which in turn publishes all information related to the development and management of the Cairo metro network. NAT discloses information regarding new projects, development projects and modernization activities (rolling stock assets, central controlling stations) through the authority's official website www.nat.org.eg and along with various media such as radio and television, in order to reach its diverse stakeholder groups.

4.2 Internal Stakeholders Engagement Activities

According to NAT and ECM, engagement activities with workers/staff happen physically through staff meetings and virtually through faxes and emails.

4.3 Future Stakeholders Engagement Activities

The type of information disclosed and the specific method of communication to be undertaken by NAT for the Project are summarised in Table 2 below. The objective of engagement is to provide local communities that are directly affected by the Project and interested stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

Information disclosure and stakeholder engagement are the cornerstones of managing the social impacts of projects and fundamental principles of the EIB and EBRD's Environmental and Social Policy (ESP) and Access to Information Policy (AIP). Mandatory restrictions and social distancing measures associated with Covid-19 in the economies where the lenders invests, however, rule out some traditional consultation

approaches in the short term. Projects at a stage of active engagement with stakeholders therefore need to develop alternate plans, taking account of mandatory, national Covid-19 restrictions and social distancing.

Table 2 Stakeholder Engagement Program

Stakeholder		Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
Primary Stakeholders							
Potentially Affected CML2 users Potential Affected Communities along the Route of CML2	CML2 users	<ul style="list-style-type: none"> - Media - Social media - signs and warnings - Leaflet distribution - Website - Postal and online questionnaires and feedback forms 	<ul style="list-style-type: none"> - Project Non-Technical Summary - Schedule of preparation and construction - Outline of construction and operation - environmental and social impacts and proposed mitigation measures 	<ul style="list-style-type: none"> - Familiarize CML2 users/ surrounding communities with company's policies - Provide access to grievance mechanism - Address complaints in a transparent and appropriate manner 	Arabic	- Prior to and during construction	<ul style="list-style-type: none"> - Site Engineers - SDO
	Young people (job seekers)						
	Vulnerable groups Women Elderly disabled persons						
Project lender	EIB, EBRD	<ul style="list-style-type: none"> - Company's website - Email - Meetings - Telephone - Teleconference 	<ul style="list-style-type: none"> - Reporting on updates and progress - Major incidents/ non-compliances with Lenders Requirements/ Standards - Annual E&S Performance Report 	<ul style="list-style-type: none"> - Meet the Environmental and Social Policy requirements - Meet the monitoring and reporting requirements 	English	<ul style="list-style-type: none"> - Bi-annual - In case of major incidents and non-compliances 	<ul style="list-style-type: none"> - NAT Environmental Department HQ
Project Owner	National Authority for Tunnels (NAT)	<ul style="list-style-type: none"> - Email - Bulletin boards - Staff meetings - Contracts 	<ul style="list-style-type: none"> - Schedule of the project phases of construction and operation - HR Policy 	<ul style="list-style-type: none"> - Familiarize workers with the policies and regulations 	Arabic	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	<ul style="list-style-type: none"> - Site Engineers - HSE Officer - SDO
	Egyptian Company for Metro (ECM)						

Stakeholder		Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
Ministry of Transportation	Workers in CML2 Stations	<ul style="list-style-type: none"> - Company's website - Fax - Letters - Staff meetings - Virtual meetings - Webinars 	<ul style="list-style-type: none"> - E&S Management Plan - Address the grievance mechanism and how to access it - Working Hours - Annual E&S Performance Report 	<ul style="list-style-type: none"> - Follow the guidelines of NAT's E&S system - Handle complaints in a transparent and inclusive manner 			
Governmental Institutions	Ministry of Environment - Egyptian Environmental Affairs Agency (EEAA)	<ul style="list-style-type: none"> - Fax - Post Mail - Email - Formal meetings, official communication - Virtual meetings 	- Compliance reports with the national environmental requirements.	- Complying with Law 4/1994	Arabic	- Bi-annual	- NAT Environmental Department HQ
	The Environmental Office within the Governorate		<ul style="list-style-type: none"> - Schedule of the project phases pre-construction and operation - Environmental and Social Management Plan - Project Non-Technical Summary, SEP, environmental and social Audit 	<ul style="list-style-type: none"> - Obtaining required permits - Reveal the project's progress and updates - Construction activities details 	Arabic	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	- NAT Environmental Department HQ
	The Ministry of Communications						
	The Ministry of Electricity						
	Cairo Governorate						
	Ministry of Health						
	Ambulance Authority						
	Ministry of Interior						
	Civil Protection Departments						

Stakeholder		Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
	Arab Organization for Industrialization		and Assessment (ESAA) environmental and social action plan (ESAP) - Regular updates of key information				
Contractors	Main Contractor (not identified)		<ul style="list-style-type: none"> - Schedule of the project phases of construction and operation - HR Policy - Environmental and Social Management Plan - Working Hours - Annual E&S Performance Report - Address the grievance mechanism and how to access it 	<ul style="list-style-type: none"> - Familiarize workers with the policies and regulations - Follow the guidelines of NAT's environmental and social system (ESMS) - Handle complaints in a transparent and inclusive manner 	Arabic and/or English	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	<ul style="list-style-type: none"> - Site Engineers - HSE Officer - SDO
	Contractor workers during construction	<ul style="list-style-type: none"> - Contracts - Emails - Meeting - Telephone - Company's website - Fax - Teleconference 					
Secondary Stakeholders							
Service Providers	Traders Local business owners	<ul style="list-style-type: none"> - Formal Meetings - Contracts - Telephone - Brochures - Company's website - Fax 	<ul style="list-style-type: none"> - The facilities and amenities needed to be provided for NAT/ ECM workforce 	<ul style="list-style-type: none"> - Contracting with different local suppliers 	Arabic	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	<ul style="list-style-type: none"> - Site Engineers - Environmental and Social Officers

Stakeholder		Communication Method	Information to be Disclosed	Objective	Language	Timeframe	Responsibility
Media	Local and Online Media	<ul style="list-style-type: none"> - Company's Website - Newspapers - Online Social Media Platforms - Newsletters - TV/Radio broadcasts 	<ul style="list-style-type: none"> - Disclose project design plans - Share construction progress and any other updates - Publish high-level project's environmental and social impacts and mitigation 	<ul style="list-style-type: none"> - Communicate the different environmental and social impacts and mitigation measures of the project - Reveal the project's progress and updates 	English Arabic	- During construction	<ul style="list-style-type: none"> - Public Relations Department NAT - Environmental Department NAT
Civil Society	Local NGOs in the regional level, as well as the local Community Development Association	<ul style="list-style-type: none"> - Email - Workshops - Surveys 	<ul style="list-style-type: none"> - These organizations can also influence the views of others regarding the project, nationally and internationally. - Responsible of sharing information with the community - In the case of this project, it may be useful to engage specifically with NGOs and CDAs focusing and women related issues as well as persons with disabilities. 	<ul style="list-style-type: none"> - Provide access to grievance mechanism - Non-technical Summary - Project implementation schedule - Employment opportunities 	Arabic	<ul style="list-style-type: none"> - Prior to and during construction - During operation 	<ul style="list-style-type: none"> - Public Relations Department NAT - Environmental and Social Officers

Regular documentation of future stakeholder activities in order to engage relevant stakeholders, in order to enable the success of the project will consider the inclusion of the below items:

- The channels utilized to share the information was disclosed (oral, flyers, documents, emails ... etc.), as well as the distribution methodology
- Locations and dates in which meetings are taking place in an updated form
- List of stakeholders consulted, and whether they are individuals, groups, or organizations
- Critical points mentioned and key concerns raised
- Resolutions for potential risks and concerns discussed, and follow-up actions if applicable
- The platform used to document activities
- The channels developed to report back to stakeholders.

The Stakeholder Engagement Plan will be updated frequently in order to reflect ongoing information disclosure activities and outline key areas of development and improvement to better meet the disclosure needs of relevant stakeholders.

5 DISCLOSURE OF INFORMATION

Information Disclosure is a mutual and collaborative process through which to engage with stakeholders in a critical and meaningful manner. Information Disclosure enables project leaders to identify stakeholder concerns, feedback and issues related to both the environmental and social components of a project to be taken into account according to Good International Practice (GIP). Disclosure of information related to the project will align with the Egypt's national legal requirements, as well as the international standards of project development.

The disclosure of information related to the project is obligatory in case of the following conditions:

- Rules and regulations of the national labour law throughout different phases of implementing the project; and
- In case of any substantial breaches in the environmental law or work permit circumstances that was indicated by the environmental control authorities

The National Authority for Tunnels will follow legal procedures for disclosing environmental and social information to diverse stakeholders affected by the project, such as the metro users, during the project construction and operation.

Affected Communities (Metro Users/Neighbouring Communities)

Numerous communication channels will be utilized to undertake the information disclosure process, such as regular reporting and meetings, as well as the disclosure of relevant developments on a daily basis via personal or mail contacts throughout the organizational hierarchy among affected parties, such as those residing near the metro station as well as metro users. Additionally, meetings can be organized upon the request of stakeholders.

Government Bodies

Communication with governmental bodies in order to disclose relevant project information related to both environmental and social issues will be undertaken through the management of supervision of the National Authority for Tunnels throughout the development of the project.

Staff and Workers

Diverse communication channels will be utilized for engagement with internal stakeholders such as metro workers and staff. Information will be shared widely and made accessible from at the start of the hiring stage, and throughout the project's implementation to ensure internal stakeholders are informed of project developments as they occur through the below channels.

- Regular meetings,
- Notifications on bulletin boards
- Trainings
- Information letters on different hierarchal organization levels.

Due to the current COVID-19 crisis, the project will take the precautionary approach as long as the risk exists, to minimize the risk of COVID-19 transmission during information disclosure, by disseminating information through digital platform (where available) and traditional means of communications.

6 Grievance Mechanism

6.1 Objectives

The objective of a grievance mechanism procedure is to ensure that all comments and complaints from any project stakeholder are considered and addressed in an appropriate and timely manner. Grievance system is important to ensure that complaints are properly handled immediately and to ensure that information is shared transparently. A functioning Grievance Mechanisms (GM) is considered to be a good feedback mechanism from the project affected persons (if any) and one tool of the citizen engagement.

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

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

6.2 NAT and ECM Workers' Grievances Mechanism

NAT and ECM are obliged to provide an effective grievance mechanism for workers in case there are any complaints, potential risks, or workplace concerns. Workers' Grievance mechanism and how to access it will be communicated with the workers during the hiring process so they are aware of how it works. Confidential grievances will also be taken into consideration without providing any personal information. Workers will also be made aware of the timeline of how the grievance system works, including addressing concerns promptly, with an expectation of a constructive feedback, and without any retribution.

6.3 NAT Current Community Grievance Mechanism

NAT has an existing Grievances Mechanism. The process of receiving and managing grievances is shown in Appendix (1). The Current grievance mechanism is a participatory tool for the internal and external stakeholders, while it is a mandatory process for NAT. The procedure described in this document is extended to communities, all workers onsite, including permanent workers, casual workers, service providers, consultants, suppliers, subcontractors and external stakeholders, accessible to all workers, and at no cost and without retribution.

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

6.3.1 Institutional Responsibility for Grievances

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

- The Grievances Committee receive the complaint
- The Grievances Committee directs the complaint to the concerned department or to the engineering department for investigation
- The complaint and the investigation report are routed back to the grievances committee, where a report is prepared and raised to the decision-making authority

- Document all received grievances
- Document, report and disseminate the outcome of received grievances
- Ensure that each legitimate complaint and grievance is satisfactorily resolved by the responsible entity
- Monitoring grievance redress activities.

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

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

6.3.2 Grievance Tiers

The proposed mechanism is built on two tiers of grievances:

First tier of Grievances: project level (on Site)

The Project Manager on site (contractor) is responsible to ensure that the GRM system is widely promoted and well explained on the local level. Moreover, s/he will follow up on the complaint until a resolution is reached. The turnaround time for an effective resolution will be 10 days from receiving the grievance and the E&S development officer will inform the complainant of its outcome.

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

Grievances are documented through the grievance log, which is designed for project to ensure documentation and follow-up (see **Error! Reference source not found.**). 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.

6.3.3 Grievance Channels

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

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

6.4 Grievance Mechanisms Best Practice

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

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• **Grievance Cycle**

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

• **Response to Grievances**

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

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

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

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

• **Confidentiality**

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

• **Management of GM**

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

• **Monitoring of Grievances**

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

- Number of received grievances per month (Channel, gender, age, basic economic status of the complainants will be included), even those which will be eventually dismissed as unreasonable.
- Type of grievance received (according to the topic of the complaint)
- Number of grievances solved
- Level of satisfaction with grievance resolutions
- Documentation efficiency
- Dissemination activities done
- Efficiency of response to grievance provided practically and in a timely-manner.

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All grievances received shall be documented in a grievance register. A Grievance Monitoring Report will be developed on a quarterly basis to keep track of all grievances submitted. The quarterly reports will include an analysis for the above-mentioned indicators. Moreover, main findings and analyses will be documented in annual report.

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

- **Gender Sensitive Grievance Mechanism**

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

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

7 MONITORING AND REPORTING

The Stakeholder Engagement Plan (SEP) will be revised and modified regularly to reflect changes and developments throughout the project construction and operation period. The monitoring and reporting mechanism is crucial to ensuring legislative changes and standards set by NAT are reflected in the plan, effective information disclosure channels are documented, as well as to guarantee the information presented remains accurate. Changes made to activities undertaken by NAT shall be documented in the SEP.

The Social Development Officer will work closely with the Project manager on site to implement the stakeholder engagement plan activities related to the sites in CML2 through periodic reports, meetings and site visits. However, the Social Development Officer will be the focal point and assume key responsibility.

The Social Development Officer will prepare a quarterly summary for the Project's Implementation Unit on all the engagement activities organized by NAT during the reporting period. The report will include:

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

A biannual report will be prepared by NAT to outline ongoing environmental and social performance developments, report on consultation and communication activities that have taken place and identify the efficiency of the grievance mechanism.

8 RESOURCES AND RESPONSIBILITIES

Implementation of this SEP is the responsibility of the Social Development Officer and the Environmental Department in the NAT HQ who be the focal point for the following:

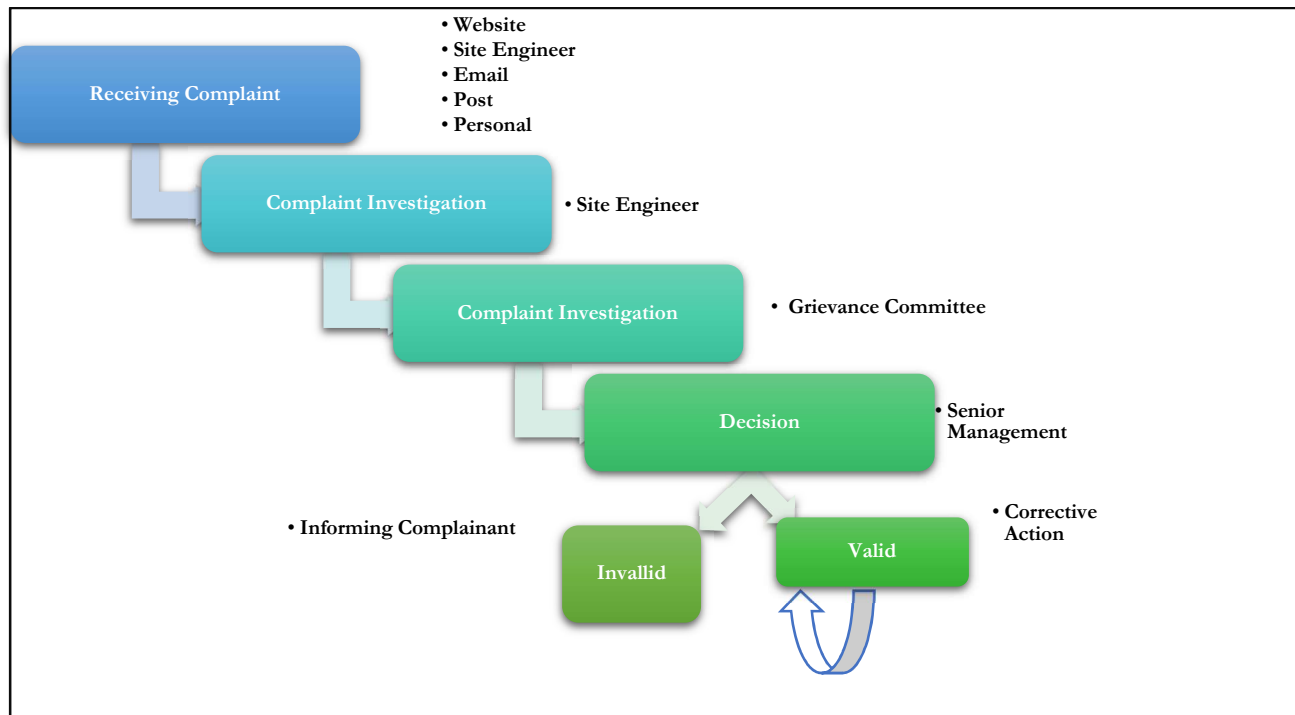
- Providing feedback to the public, relevant authorities and media when queries are received in a timely and satisfactory manner.
- Administering the grievance mechanism by maintaining a database of received grievances, responding to queries within the allocated timeframe and ensuring proven solutions are accessible.
- Ensuring permits and approvals are submitted in a timely fashion from different authoritative entities;
- Creating online content for the public to access over NAT's website;
- Conducting public consultation with relevant stakeholders when necessary
- Maintaining a frequent communication channel with public media outlets such as newspapers, radio and television in order to ensure Company developments are accessible to the public
- Providing support concerning preparing annual reports and environmental and social action plan implementation.
- Regularly updating and implementing this Stakeholder Engagement Plan to reflect internal changes as well as promote effectiveness.

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

The Social Development Officer and Environmental Department NAT HQ are also responsible for the handling and collection of internal grievances, and different communication events with workers. Their contact should be made available and accessible to all workers, regardless of their status.

9 Appendices

Appendix 1: NAT Current Grievance Mechanism



NAT Current Grievance Mechanism (NAT 2021)

Appendix 2: SAMPLE GRIEVANCE FORM

☐

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

