EGYPT

KAFR EL SHEIKH WASTEWATER PROJECT – AWARENESS RAISING CAMPAIGN

Terms of Reference

1. BACKGROUND

The European Bank for Reconstruction and Development (EBRD) is financing a sovereign loan of 55 million Euros for the expansion of wastewater treatment in the Kafr El Sheikh (KES) governorate to be on-granted to the state owned Kafr El-Sheikh Water and Sanitation Company (KWSC), which is a subsidiary of the Holding Company of Water and Wastewater (HCWW).

The project Kafr El Sheikh Water Expansion Programme is co-financed between the EBRD, the European Investment Bank (sovereign loan of 77 million Euros) and the EU Neighbourhood Investment Facility, which will provide a grant of 10.4 million Euros. The project was designed as part of the EU initiative Horizon 2020, which aims at decreasing pollution levels in the Mediterranean.

The investment will provide first time sanitation to around 470,000 people in the three districts of Burullus, Desouk and Motobas in the KES governorate through the (i) construction of two new wastewater treatment plants; (ii) the expansion of three existing wastewater treatment plants and (iii) the laying of about 700 km of pipes together with the installation of 52 pump stations.

Concerns and issues related to wastewater disposal are widespread throughout Egypt and threaten public health and the environment. In particular, the predominantly rural Kafr El-Sheikh (KES) governorate has the highest percentage of bacterial contamination of waters (52.1%) compared to any other governorate in Egypt. In KES governorate only 86.6% of households are connected to the public water network (which is below the national average of 96.4%) with 46.8% connected to the public sanitation network. In the districts of Desouq, Motobas and Burullus, however, only 1.5 % of households are connected to the public sanitation network.

Quantitative data from a baseline survey commissioned by the EBRD show that sanitation is believed to be one of the most pressing problems in KES, whilst respondents consider education and poverty to be much less of an issue. When asked to decide on the three most urgent interventions that are expected to improve local conditions over half of the respondents pointed to the extension of local sanitary pipelines. About 86% of survey respondents believe that sanitation issues in their villages affect their household’s health, additionally 84% indicated that sanitation issues affect their household’s economic activities.

The survey also revealed that access to water, hygiene and sanitation (WASH) information is limited and mainly disseminated by health centres. Access to information represents a main

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1 Egyptian Demographic Health Survey, Ministry of Health (2008)
2 Egypt, Kafr El-Sheikh (KES) Wastewater expansion programme- Baseline study (2014)
issue of concerns in view of an alphabetization rate in KES below 60%. However, the high mobile penetration of above 98% in KES suggests that mobile platforms might represent an important outreach vehicle for information sharing and knowledge dissemination.

Water and wastewater management is being decentralised in Egypt, but meaningful involvement of users remain a concern. Findings of the World Bank led project Integrated Sanitation and Sewerage Infrastructure Project (ISSIP) in KES indicate that multi-stakeholder advisory committee can improve meaningful involvement of users, when a participatory approach is used in structuring the governance of the committee. Also, according to HCWW, the poor involvement of users is related to the lack of a streamlined and strategic approach to awareness raising, monitoring and impact assessment of activities related to water and wastewater management. HCWW reported that the lack of modern ICT technology further contributes in widening the communication gap between water and wastewater local utilities companies and end users.

According to HCWW, managing customer satisfaction represents a major issue in view of the decentralised water and wastewater management system. Information received is uneven across governorates and impedes the development of effective communication strategies targeting customers. Access to information on water and wastewater issues is hampered by the geographical distribution of population, in particular in rural areas such as the Kafr El Sheikh governorates, where customers are distributed in numerous villages across the territory. Also, cooperation on WASH between HCWW subsidiaries with community based and other civil society organisations is scant due to the lack of funds and ability to raise funds to support initiatives.

The KES governorate is recipient of major investments and technical assistance project from the international community, including on water and wastewater issues. However, coordination among donors is scattered resulting in misinformation and expectation mismanagement at beneficiary level. This has been confirmed during three consultation meetings organised in January 2015 in the districts of Desouq, Motobas and Burullus by HCWW and KSWC, which were attended by the EBRD Civil Society Engagement Unit. At those meetings representatives of civil society requested clarity about the bulk of investments taking place in the KES governorate and to be timely informed about the construction work of water and wastewater facilities and related service disruption. Civil society participants also recognised that a meaningful engagement of community representatives and grass root level organisations is a priority area where progress can be made in water and wastewater management.

**Current Assignment**

This consultancy services assignment will support the EBRD project Kafr El Sheikh Wastewater Expansion Programme in achieving its systemic impact by building capacity of HCWW (the Client) and its subsidiary KWSC to engage with the public and civil society groups and organisations and raise awareness on sustainable water and wastewater management practices. It is expected that upon completion of the project, consumers and local communities will be timely informed about the construction work of water and wastewater facilities and related service disruption and a meaningful engagement of community representatives and grass root level organisations in water and wastewater management will be achieved. The assignment will consist of three assignments: (1) a scoping study for the development of a mobile application (in parallel); 2) the development of
the mobile application (to come after 1); and (3) awareness raising activities on sustainable water and wastewater management practices (this assignment).

Gender issues will be mainstreamed in the assignment as women and girls play a central role in enhancing water, hygiene and sanitation practices as the main providers of domestic water supply and sanitation and maintainers of a hygienic home environment. A specific section on gender issues will be integrated in the awareness raising and communication strategy of HCWW and its subsidiaries.

The assignment is in line with the scope of the EBRD Civil Society Capacity Building Framework and contributes to the EBRD Sustainable Resource Initiative in relation to water efficiency. The assignment is also in line with the strategic priorities identified in the EBRD Egypt Country Assessment in relation to the support to investments in water supply and wastewater collection and treatment facilities. The assignment is expected to contribute to significant improvements in quality of life and support economic development by promoting sustainable water and wastewater management practices through the promotion of meaningful public engagement and awareness raising practices.

In line with international best practices on civil society engagement, the EBRD recognises that community representatives and grass root level organisations can bridge the dialogue gap between institutions and end users and contribute in building civil society’s support to investments.

A Stakeholder Engagement Plan for the Project was carried in 2014 and any outputs produced under this Assignment should be cognisant of same. A copy of the SEP can be found in Appendix A to this document.

2. OBJECTIVE

The objective of this assignment is to build capacity of HCWW and its subsidiary KWSC to engage with the public and civil society groups and organisations and raise awareness on sustainable water and wastewater management practice.

The geographical scope of the project will be the districts of Burullus, Desouk and Motobas in the Kafr El Sheikh governorate.

The assignment is expected to enhance the systemic impact on economic inclusion of the EBRD financed project by promoting behavioural change among consumers in relation to their attitudes towards sustainable water and wastewater management practices in the three districts.

In line with the United Nations principles on water, hygiene and sanitation (WASH) initiatives, the assignment will contribute to the achievement of Sustainable Development Goals (SDGs) in particular with regards to improved health, access to education and socio-economic livelihood.
3. SCOPE OF SERVICES

Inception phase

The consultant will prepare an inception report, which will outline the process for the accomplishment of the following tasks:

a) Review and update the awareness raising and communication strategy of the HCWW, and develop a related action plan for the implementation of the strategy at both holding and subsidiary level. A 2016 annual communications action plan and a master plan until 2025 could inter alia be developed in this context.

b) Assess training requirements of HCWW Public Awareness Department and KSCW public awareness officers at subsidiary level;

c) Develop impact level indicators for HCWW and its subsidiaries on public engagement and awareness raising related to water and wastewater monitoring and evaluation tools.

d) Organise and facilitate a donor coordination workshop in Cairo on water and wastewater public awareness, which will include sessions on specific governorates recipient of investments, including Kafr el Sheikh and Upper Egypt.

e) Develop a marketing strategy for the promotion of the mobile application and develop the content of the first pilot awareness raising campaign in relation to the Kafr El Sheikh Wastewater Expansion Programme.

f) Pilot the awareness raising and communication strategy in the Kafr El Sheikh governorate by:

(i) Assessing capacity building and information needs of civil society stakeholders and broader consumer base related to water and sanitation services in the districts of Motobas, Desouq and Burullus;

(ii) Outlining an action plan on WASH capacity building and outreach targeting identified civil society groups in the three districts to be implemented by KSCW; and

(iii) Supporting KSCW in conducting identified activities aimed at capacity building for community participation also in collaboration with local social enterprises, civil society organisations and other civil society groups as relevant.

The consultant will discuss and agree the approach of each of the tasks listed above with the HCWW Public Awareness Department. The inception report shall be approved by the HCWW Public Awareness Department before being submitted to the EBRD.

Implementation phase

a) Review and update the awareness raising and communication strategy of HCWW, and develop a related action plan for the implementation of the strategy at holding and subsidiary level

The consultant will review the current practices and policy requirements of public engagement, customer relations’ management and overall communication of HCWW, also at subsidiary level, with the objective to develop a communication strategy for HCWW. The consultant will outline in agreement with the HCWW Public Awareness Department the deliverables of the communication strategy, which could include inter alia a 2016 annual
communications action plan and a master plan until 2025 to ensure that short-term objectives are framed in a roadmap for public engagement thus enhancing the sustainability of the assignment.

The strategic approach will be developed at HCWW level and not directly at KSCW level, because all subsidiaries implement the public engagement policies of the Mother Company and also public awareness officers at subsidiary level report to the central level. For the development of the strategy the consultant will seek a participatory approach from subsidiaries to ensure the feasibility of the strategy implementation at subsidiary level as well as all other relevant stakeholders including donors and civil society representatives among others. The consultant will mainstream issues such as gender, youth, age and urban-rural divide in the strategy to ensure that all relevant inclusion aspects are integrated in the strategy. The consultant will also integrate a section on fund raising strategies as part of the strategic documents developed as per agreement with the Client with the objective to enhance the financial sustainability of the activities undertaken by the HCWW Public Awareness Department.

b) **Assess training requirements of HCWW Public Awareness Department and KSCW public awareness officers at subsidiary level**

The consultant will undertake an assessment to identify training needs of HCWW Public Awareness Department and KSCW public awareness officers with the aim to suggest areas of improvement and innovation for training curricula. The Client pledged to support staff attendance to training opportunities and development of training curricula with its own budget.

c) **Development of impact level indicators for HCWW and its subsidiaries on public engagement and awareness raising related to water and wastewater**

The consultant will closely work with the HCWW Public Awareness Department to identify and develop monitoring and evaluation tools for public engagement and awareness raising activities related to water and wastewater. To develop the indicators and in agreement with HCWW Public awareness Department, the consultant will be expected to conduct a comparative assessment of public engagement activities on water and wastewater implemented by HCWW and its subsidiaries, CSOs, donors and governmental authorities in Egypt. This exercise will provide an overview of best practises and lessons learned to develop impact level indicators.

The consultant will develop a short training module on monitoring and evaluation tools for public engagement and will conduct a one day training of trainers at HCWW to a target group of public awareness officers as identified in agreement with the HCWW Public Awareness Department.

d) **Organisation and facilitation of a donor coordination workshop on water and wastewater for public awareness and communication efforts**

The consultant will support the HCWW Public Awareness Department in the design, organisation and facilitation of the first donor coordination workshop in Cairo on water and wastewater public awareness, which will include sessions on specific governorates and other areas recipient of investments, including Kafr el Sheikh and Upper Egypt. The assignment
will cover the costs related to the organisation of the first workshop including inter alia office supplies (e.g. pens, notebooks), refreshments and venue rental.

The consultant will write the final report of the workshop, which will entail recommendations to donors and HCWW for the achievement of better donor coordination. One of the recommendations may be the development of a web-based knowledge repository (open source database) of all donor funded activities related to WASH public awareness in KES provided that there is donor commitment for sustainable maintenance of the repository through regular updates.

The consultant will advise the HCWW Public Awareness Department on the identification of participants and agenda workshops according to the main needs arising from the comparative analysis conducted as per activity b) of the assignment. Relevant public authorities and representatives from the civil society sector, such as eminent academics or independent expert on water and wastewater issues will be invited to the workshop.

It is envisaged that the draft Communication Master Plan as developed as per para. a) will be also presented and discussed at the workshop.

\[ e) \text{ Development of a marketing strategy for the promotion of the mobile application and related development of the first pilot awareness raising campaign in relation to the Kafr El Sheikh Wastewater Expansion Programme } \]

The consultant will design the marketing strategy for the promotion of the mobile application among the customer base and support the implementation of the activities identified using as a pilot the Kafr El Sheikh governorate. In particular, the consultant will develop in collaboration with HCWW and KSCW an awareness raising campaign on sustainable water and wastewater management practices using as a platform the newly launched mobile application. The consultant might in agreement with the Client consider developing an initial survey for the launch of the mobile application and based on its findings develop targeted communication messages. The methodology for the implementation of this activity will be related to activity e). The Consultant should take full account of the Scoping Study (to be shared by EBRD).

\[ f) \text{ Implementation of the awareness raising and communication strategy in the Kafr El Sheikh governorate } \]

The consultant in close cooperation with the KSCW public awareness officer will assess capacity building and information needs of civil society stakeholders and broader consumer base of water and sanitation services in the districts of Motobas, Desouq and Burullus. Based on the needs assessment the consultant will support KSCW in outlining an outreach and action plan on capacity building and awareness raising activities on water, sanitation, hygiene and related public health issues. The target audience of the action plan will be key civil society groups and other civil society stakeholder in the three focus districts.

The consultant will conduct as per agreement with KSCW and HCWW identified activities in collaboration with local social enterprises, civil society organisations and other civil society groups as relevant. Activities might include inter alia the establishment of users committees; awareness raising activities in schools, local health centres and other local communities centres; and capacity building of target groups such as through fishermen associations,
agriculture cooperatives, environmental and other civil society groups and organisations, women’s groups and youth movements. Also, the activities might include small grant investments in social enterprises that would be able to deliver a service with a measurable social return/impact. Pending the findings of the needs assessment of HCWW and KSCW Public Awareness Department, the activities might also aim at building the capacity of a unit for community participation in the newly created decentralised systems for wastewater.

4. IMPLEMENTATION ARRANGEMENTS AND DELIVERABLES

The EBRD Civil Society Engagement Unit (CSEU) is the administrator of the assignment. The consultant will report and consult throughout the assignments with the Client, and the Client will report to the CSEU. Deviation from the tasks agreed in the inception report should receive prior approval by the CSEU. The EBRD will conduct at least two monitoring visits throughout the duration of the technical cooperation project.

The consultants will be required to develop and implement the assignment as per agreement with the HCWW Public Awareness Department and – when appropriate- inform and coordinate with relevant Egyptian authorities working on water management, among others the Egyptian Water and Wastewater Regulatory Agency, the Ministry of Health and Population and the Ministry of Water Supply and Sanitation Facilities. The consultants will also seek to involve in training activities- as relevant- experts from the National Water Research Centre and the National Organisation for Potable Water and Sanitary Drainage. For public awareness and capacity building activities the consultant in agreement with the Client will seek the involvement of the Ministry of Education. In case of sub-contracting of activities related to the awareness raising assignment, the consultant will take care of applicable administrative procedures as set by the Ministry of Solidarity and Social Justice of the Republic of Egypt.

Budget, timetable and deliverables

The assignment will last 24 months starting from early 2016. The key deliverables and target dates for the assignment are as follows:

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Donor Visibility

Given the assignment is funded through the EBRD’s donor funded technical cooperation programme, the Consultant will be required to support the client to ensure visibility of these resources. Support on these visibility aspects can be obtained from the Bank’s Communications Department. Measures could include but not be limited to:

- All documents produced by the Consultant should mention donor support and bear the logo of the donor, when appropriate.
- Donor support to the project should be acknowledged in any public communication (press releases, launch of facilities)
- Local representatives of donors should be invited to any public event organised to promote the project (press conferences, inaugurations, possibly stakeholder participation programmes)

Please contact Lucia Sconosciuto (email: SconoscL@ebrd.com; tel: +44 20 7338 8155) for further information. Some donor visibility guidelines can also be provided by the Bank to Consultants at the start of an assignment.

5. CONSULTANTS PROFILE

The Consultants team will include the following expertise:

- Team Leader with international experience, with expertise in public engagement and social impact, and a proven track record of awareness raising and capacity building activities in the water and wastewater sector.
- Marketing expert.
- A specialist on monitoring and evaluation tools.

Where relevant- the consultant will provide technical assistance to beneficiary entities, in terms of financial management, communication, impact reporting and other skills required to achieve the prospected social impact. The consultant will be required to set-out clear communication lines with HCWW Public Awareness Department and KSCW subsidiary so that the companies will be able to draw on the support of the consultant as required.
APPENDIX A Stakeholder Engagement Plan for the Project
European Bank for Reconstruction and Development

Kafr El Sheikh Wastewater

Stakeholder Engagement Plan

SEP/001

Rev A | 31 March 2014

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 213982-08
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### Appendices

**Appendix A**

Sample Grievance Form
1 Introduction

Arup has been appointed by The European Bank for Reconstruction and Development (EBRD) to undertake an Environmental and Social Due Diligence (ESDD) exercise to support the project. This document is the project Stakeholder Engagement Plan (SEP) and is one of the required documents to meet EBRDs’ Environmental and Social Policy (2008) and the associated Performance Requirements.

1.1 Project Description

The EBRD is considering co-financing the design, build, finance, operate and maintenance of the Kafr El-Sheikh Wastewater Project. The project includes the expansion of wastewater collection and treatment services in three districts (Motobas, Desouq and Burullus) in the Kafr El-Sheikh (KES) Governate and will provide first time wastewater services to approximately 500,000 residents.

The project includes the construction of centralised integrated wastewater collection and treatment comprising gravity and positive mains, connections to households pumping stations and wastewater treatment plants (WWTP) for villages in the Motobas, Desouq and Burullus Districts of the Kafr El-Sheikh (KES) Governate in the north west of the Delta region of Egypt. The expansion is expected to entail:

- the construction of two new WWTPs;
- the expansion of three existing WWTPs;
- the laying of approximately 700km of sewage pipelines; and,
- the installation of 52 pumping stations to connect villages to the wastewater network.

1.2 Purpose of this Plan

The purpose of the Stakeholder Engagement Plan is to present how Kafr El-Sheikh Water and Sanitation Company (KWSC) plans to communicate with people who may be affected by or who are interested in the project. The plan also describes the grievance mechanism for people to raise any concerns about the Project. The SEP will be periodically updated, as important Project information becomes available, such as the timelines for construction, the selection of contractors, the organisation of the EIA public meetings and the submission of key documentation to gain consent for the project.
2 Public Consultations and Information Disclosure Requirements

2.1 EBRD Requirements

Projects financed by the EBRD are required to meet good international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy of 2008. These requirements are described in detail in PR 10 of the Policy “Information Disclosure and Stakeholder Engagement”.

The EBRD policy considers Stakeholder engagement an ongoing process which involves:

- the client’s public disclosure of appropriate information so as to enable meaningful consultation with stakeholders;
- meaningful consultation with potentially affected parties, and,
- a procedure or policy by which people can make comments or complaints.

2.2 Egyptian Legal Requirements

In Egypt, stakeholder engagement processes are held during the EIA phase of the proposed projects. The steps in this process are summarised as follows:

**Para 6.4.3 Requirements for Public Consultation**

**EEAA Guidelines Para 6.4.3.1 Scope of Public Consultation**

Since public consultation is undertaken with the EIA process, it is a consultation undertaken mainly on the environmental and social aspects related to the project. Accordingly, this consultation does not include the political or economic aspects or any other aspects not to be addressed in the EIA. Competent administrative authorities (CAA) are concerned with these aspects, each in its scope of responsibly and the main purpose of the consultation meetings is to clarify these issues. The consultation process provides the concerned parties with the opportunity to indicate their opinion in the measures to minimize potential negative environmental and social impacts, strengthen social acceptance of the project, informing the concerned parties that the environmental impacts will be minimized to levels that are low as reasonably practical and achieve the balance between legitimate requirements for development and environmental protection.

The concerned parties of a project include, as a minimum:

- EEAA and its RBOs
- Competent administrative authorities, indicated as per the project location and nature
- The governorate in which the project is located (in some of the projects the CAA is not the governorate)
- Local popular councils
- Representative from affected communities such as neighbouring facilities, people living near the project
- General public.

This is related to the project location, type and resulting impacts.

In addition to the continuous consultation along the EIA process, public consultation should be carried out as a minimum at two stages of the EIA process: shortly after the EIA scoping and once a draft EIA report has been prepared. During this stage, additional consultation should also include:

- Local NGOs interested in environment
- Local universities and research centers
- Other concerned parties

Note that the continual consultation of the surrounding community and concerned parties during project operation phase to achieve social agreement is one of the requirements for funding agencies and the EBRD.

**Para 6.4.3.2 Methodology of Public Consultation**

1. Preparation of the Public Consultation Plan before Starting
2. Public Consultation during EIA Scoping
3. Consultation on the Draft EIA Report

**Para 6.4.3.3 Documentation of the Consultation Results**

The following key issues related to public consultation will be included as an integral part of the EIA report:

As an individual chapter: An individual chapter in the EIA will be prepared for public consultation, documenting Methodology, data analysis, different concerns raised in the meetings, further consultation plan and commitments to improve surrounding environment and wellbeing of local communities.

As an annex, documenting public meetings and meetings including dates, name of attendees as well as agenda and topics of discussion.

*The process of public participation and consultation to ensure engagement of community stakeholders, central and local governmental bodies, as well as civil society organizations is emphasized in Egyptian regulations.*

*The public participation and consultation shall be insured with affected communities whereby concerned people are given the opportunity to express an opinion before the project is initiated on one hand, and project concessionaire shall consider and respond to them on the other hand. Guidance of methods and mechanisms of engaging the community in such a process is provided in detail in the EEAA Guidelines.*

**Para 7 Requirement and Scope of the Public Disclosure**
Disclosure of relevant material is an important process and should be undertaken in a timely manner for all Category C projects. This process permits meaningful consultations between the project proponent and project-affected groups and local NGOs is required to take place.

Before the public consultation on the draft EIA, the draft technical summary in Arabic should be disclosed to all concerned parties. After the EIA process is complete, the EIA report will be stored at EEAA’s central library or that of the RBO of the projects region. Moreover, the executive summary of the final EIA will be available at EEAA website.

Disclosure to ensure transparency and accessibility of information for stakeholders is emphasized in Egyptian regulations.

Timely access of local communities to relevant project information is required to help people to understand risks, impacts and opportunities, but no guidelines on methodology and mechanisms of disclosure are explicitly provided. EBRD guidance provides more detail about the process than Egyptian regulations.

Environment Law no. 4 of 1994

Every citizen and organization concerned with the protection of the environment shall have the right to report any violation of the provisions of this Law.

EEAA Guidelines Para 4 The Appeal System

The procedures for the appeal system are included in law 4/1994 for the protection of the environment and its ERs (Articles 21 of law 4/1994 and articles 14-16 of its ERs) and are presented in the following:

- The proponent has the right to appeal the decision taken by EEAA regarding the EIA and/or the measures required to be implemented. The appeal is submitted to the Permanent Review Committee by project proponent within 30 days after receiving such decision.

- This appeal is to be submitted, in writing, to EEAA including reasons of appeal, supported with legal and scientific reasons as well as other documents that verify submitted evidence. The appeal is to be submitted by the project proponent or by his representative according to an official power of attorney.

- The Permanent Review Committee shall convene, at the invitation of EEAA CEO within 15 days as of the date of the Agency's receipt of the written appeal. The Permanent Review Committee has to make its decision within 30 days from the date of receiving the appeal documents. The Permanent Appeal Committee may seek the assistance of any person it chooses when carrying out its functions, and in this case it shall define the task entrusted to him/her, or in what respect his/her assistance is to be sought.

- The committee shall issue its decision, concerning the appeal submitted to it, with the majority of votes. This decision must be issued within 30 days from of the date of the receipt of the complete documents of the appeal.

- The committee shall communicate its decision to the CAA via a registered letter with an acknowledgment of receipt.
Within Egyptian regulations, the facilitation of community concerns is emphasized in order to directly resolve grievances about environmental and social performance. Guidance on mechanisms and procedures is also clearly provided in this regard.

3 Summary of Previous Stakeholder Engagement

No formal stakeholder engagement activities have taken place so far. However, at least one meeting took place in each village to identify potential land plots for PSs.

Meetings usually take place in the Local Unit of the village, where local officials, popular leaders, and other interested people (landlords and heads of prominent families) participate. In addition to meetings, transect walks were used to spot various land plots for further technical examination. For public land, meetings were directed to direct land allocation by local authorities (mainly the Local Unit of the village). Other meetings aimed at negotiating land prices and alternative mechanism of donating the land by rich landlords, or purchasing the land by public monetary donations. As a matter of fact, none of these activities have been recorded by the Company or by the Local Unit.

In line with the feasibility study (chapter 9), it is strongly recommend that the institutional arrangement for the project should be organised under the specifically created structure project team to be based at the KSWSSC. This unit shall comprise a national team, external Technical Assistance (TA) and Implementation Consultant (IC). The structure is deemed to provide the most effective support in managing the programme implementation and complying rigorously with technical and administrative requirements including requirements for stakeholder engagement to EBRD Performance Standards.

KSWWSC has previous experience in undertaking project stakeholder engagement to international lenders standards and this experience has highlighted the need for training of staff, awareness raising and community mobilisation which can be assisted by the TA and IC.

4 Stakeholders Identification and Analysis

Stakeholders’ identification takes the nature and location of the project and the nature of potential impacts, as well as institutional, legal and managerial framework applicable to the project into account. Identified stakeholders related to the KES Wastewater Expansion Project fall into two main groups, in addition to other pressure groups which have emerged after the revolution of the 25th of January 2011 in Egypt, as follows:

- **Primary stakeholders**: are the beneficiaries of a development intervention who will be directly affected, positively or negatively. They include local populations (individuals and Community Based Organizations) in project area. These are in particular, poor and marginalized groups who have traditionally been excluded from
participating in development efforts and outcomes; as well as local Community Based Organizations which represent their interests in the project. Given the nature of current project, farmers and fishermen representative associations at all levels are considered primary stakeholders.

- **Secondary stakeholders**: are agencies, experts, interested parties and anyone able to influence the outcome of the development, because of their ability to contribute with their knowledge or ideas to improve the design, or because of their ability to provide mitigations of environmental and social impacts, or because of their influence on the development; and also those likely to be indirectly affected by the project. They include Central Government, line ministries, local government/authorities, implementing agencies, project staff, active Civil Society Organizations (CSOs) and Non Governmental Organizations (NGOs), private sector firms, EBRD and its stakeholders, pertinent development agencies, Media, and Academia.

- **Other pressure groups**: are influential parties or groups who do not necessarily have a direct or indirect stake in the project, but after the revolutions of the 25th of January 2011 and the 30th of June 2013 could affect project implementation. These include: different lobbying groups, youth coalitions, elected members and community representatives, members of active political parties and movements; as well as national and local media.

In this regard, primary and secondary stakeholders can be identified as follows:

This list is to be verified and updated as further stakeholders are identified.

**Primary stakeholders**

- Farmers and their cooperatives
- Fishermen and their cooperatives
- Local residents in project area
- Local NGOs and CBOs in project villages
- Vulnerable groups in local communities, e.g., families without regular income, female headed households, orphans, poor farmers and fishermen, families receiving government support, families in inadequate housing, people with chronic diseases and disabilities.

**Secondary stakeholders**

- Kafr El Sheikh Governorate; KES Local Councils; Village Local Units
- National Organization of Potable Water and Sanitary Drainage; KSWSSC
- Ministry of State of Environment; Egyptian Environmental Affairs Agency; Department of Coastal Zone Management, Delta Regional Branch Office of EEAA
- Ministry of Agriculture and Land Reclamation; and General Authority for Fish Resources Development (Middle Delta District);
- Ministry of Water Resources and Irrigation; and Cooperative Union of Water resources;
- Ministry of Housing, Utilities, and Urban Communities;
- Ministry of Health; Local Health Directorates
- Ministry of Interior;
- Donors (EBRD and other donors engaged/interested in project area, e.g., GIZ...etc), and any relevant Wastewater projects in local communities
- KES University; and National Institute for Oceanography and Fisheries
- Research Community (Experts, Consultants…etc)
- National and local media

5 Public Consultations and Disclosure

5.1 Stakeholder Engagement Plan

Stakeholder engagement is about building and maintaining constructive relationships over time with both internal and external people who are affected by or interested in the investment project suggested for EBRD consideration or general KWSC’s activities. It is an on-going process between KWSC and its stakeholders that extends throughout the life of the Project and encompasses a range of activities and approaches, from information sharing and consultation, to participation, negotiation, and formation of partnerships.

The purpose of a Stakeholder Engagement Plan (SEP) is to describe KWSC’s strategy and program for engaging with stakeholders in a culturally appropriate manner (whether it be for the Project only or for entire range of activities). The goal is to ensure the timely provision of relevant and understandable information and to create a process that provides opportunities for all stakeholders, including those who are vulnerable and/or socially excluded, to express their views and concerns, and allows KWSC to consider and respond to them.

The Stakeholders Engagement Action Plan includes a clear plan of actions with deadlines and responsibilities in order to assure the maximum engagement level for all relevant stakeholders.

For each of the stakeholders identified KWSC need to assess the most appropriate method of communication and determine the time schedule of these communications.

An initial Stakeholder Engagement Action Plan for stakeholders identified at this stage is shown below. The method of communication and the timing are only provisional at this stage. This table will need to be updated regularly
<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Type and method of Communication</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Primary stakeholders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farmers and their cooperatives</td>
<td>Information through local community offices (announcements posted or meetings held); Project leaflets; Information through media – national and local newspapers, TV and radio stations; EIA public consultations; Construction signs and warnings; Organised Meetings</td>
<td>Prior to and throughout Project implementation. Notifications regarding construction, including project leaflets, will be provided at least two weeks before the beginning of construction.</td>
</tr>
<tr>
<td>Fishermen and their cooperatives</td>
<td>Information through local community offices (announcements posted or meetings held); Project leaflets; Information through media – national and local newspapers, TV and radio stations; EIA public consultations; Construction signs and warnings; Organised Meetings</td>
<td>Prior to and throughout Project implementation. Notifications regarding construction, including project leaflets, will be provided at least two weeks before the beginning of construction.</td>
</tr>
<tr>
<td>Local residents in project area</td>
<td>Information through local community offices (announcements posted or meetings held); Project leaflets; Information through media – national and local newspapers, TV and radio stations; EIA public consultations; Construction signs and warnings; Organised Meetings Local feedback has shown that the most effecting means of disseminating project information is local radio and TV, mosques, local councils, NGOs and CBOs. Followed by local leaders and Omadas, schools, members of the Parliament, and Governorate building.</td>
<td>Prior to and throughout Project implementation. Notifications regarding construction, including project leaflets, will be provided at least two weeks before the beginning of construction.</td>
</tr>
<tr>
<td>Households or businesses whose</td>
<td>Direct invitations by phone or</td>
<td>Prior to Project</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Type and method of Communication</td>
<td>Timing</td>
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<tr>
<td>Properties will be affected by temporary occupation of land or by construction</td>
<td>delivered by post to each affected household; Alternatively visits to households Meetings.</td>
<td>implementation (land acquisition phase) and throughout construction.</td>
</tr>
<tr>
<td>Local NGOs and CBOs in project villages</td>
<td>Information through local community offices (announcements posted or meetings held); Project leaflets; Information through media – national and local newspapers, TV and radio stations; EIA public consultations; Meetings</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Disadvantaged groups in local communities, e.g., families without regular income, female headed households, orphans, poor farmers and fishermen, families receiving government support, families in inadequate housing, people with chronic diseases and disabilities</td>
<td>Information through local community offices (announcements posted or meetings held); Project leaflets; Information through media – national and local newspapers, TV and radio stations; EIA public consultations; Construction signs and warnings; Banners can be located where disadvantaged groups may regularly attend e.g. health units, NGOs, Local Unit, social security directorates etc</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
</tbody>
</table>

**Secondary stakeholders**

<table>
<thead>
<tr>
<th>Secondary stakeholders</th>
<th>Type and method of Communication</th>
<th>Timing</th>
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</thead>
<tbody>
<tr>
<td>Kafr El Sheikh Governorate; KES Local Councils; Village Local Units</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>National Organization of Potable Water and Sanitary Drainage; KSWSSC</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Ministry of State of Environment; Egyptian Environmental Affairs Agency; Department of Coastal Zone Management, Delta Regional Branch Office of EEAA</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Ministry of Agriculture and Land Reclamation; and General Authority for Fish Resources Development (Middle Delta District);</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
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<tr>
<td>Ministry of Water Resources and Irrigation; and Cooperative Union</td>
<td>Official correspondence;</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Type and method of Communication</td>
<td>Timing</td>
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<tr>
<td>of Water resources;</td>
<td>Meetings.</td>
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<tr>
<td>Ministry of Housing, Utilities, and Urban Communities;</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Ministry of Health; Local Health Directorates</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Ministry of Interior;</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>Donors (EBRD and other donors engaged/interested in project area, e.g., GIZ...etc), and any relevant Wastewater projects in local communities</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
</tr>
<tr>
<td>KES University; and National Institute for Oceanography and Fisheries</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
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<tr>
<td>Research Community (Experts, Consultants….etc)</td>
<td>Information through media – national and local newspapers, TV and radio stations; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
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<tr>
<td>National and local media</td>
<td>Official correspondence; Meetings.</td>
<td>Prior to and throughout Project implementation.</td>
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</tbody>
</table>

The following general commitments should be further accounted for by KWSC in the preparation and update of Stakeholder Engagement Action Plan:

- Meetings are to be announced at least three weeks in advance and be held at time and venue that are easily accessible by the public affected. Announcements should be in media that is available to stakeholders.
- Information is to be sent out in advance of any meetings. The general guidance is three weeks prior to a meeting, so that people can come with questions and comments.
- Direct invitations should go to people who are materially affected, such as people who are being relocated because of the project. However for key groups like this, special meetings on specific topics may be advisable so that the public meeting does not become focused on just one topic.
- Informal social networks should be used for more effective communication with affected communities. These may include school teachers, organisations, residential associations, unions, churches or other religious organisations.
- The Project (also the company) webpage should contain relevant and updated information about the Project, its implementation status and other announcements. Also, the webpage should be designed as interactive as possible, thus giving the possibility of effective feedback from stakeholders.
- It is necessary to assess what is the proper method of communication for different stakeholder groups. Caution should be given especially to the language most commonly used among the population in the project affected areas.
area to assure that the communication is tailored around the needs and preferences of all stakeholders identified in the SEP.

- The public needs to be informed about the SEP. KWSC will make announcements both on company’s websites and on local mass media about the SEP. Also, the SEP will be part of the annual environment and safety report of KWSC.

The table below presents a proposed Stakeholder Engagement Action Plan. This should be periodically updated and KWSC will keep record of all activities.
<table>
<thead>
<tr>
<th>No.</th>
<th>Action</th>
<th>Objective</th>
<th>Stakeholders consulted</th>
<th>Documents subject to disclosure and methods of notification/disclosure</th>
<th>Venue (to include information about dates and locations of meetings)</th>
<th>Timeframe</th>
<th>Entities responsible</th>
<th>Performance indicator/ Outcome</th>
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</table>
5.2 Grievance Mechanism

This SEP includes a detailed description of the principles and the process by which people affected by the Project (or KWSC operations) can bring their grievances or comments to the company for consideration and redress. Typical steps of a grievance mechanism are outlined in Figure 1.

A sample of a Comments and Complaints Form is provided in Appendix A of this SEP. This form can be adapted to KWSC’s needs and made available in the local language.

Any person or organisation may send comments, complaints and/or requests for information in person or via post, telephone or email using the contact information provided below. The grievances will also be collected during construction works. Therefore the SEP will be updated with contact details of the contractors, once they are selected.

Figure 1: Grievance Mechanism Process Steps
At all times, complainants are also able to seek legal remedies in accordance with Egyptian laws and regulations.

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, if contact details of the complainant are provided.

All grievances will be responded to within 15 working days and in case of delay, complainants will be notified about the reasons for the delay and the expected timing for when their grievance will be addressed. Grievances related to compensation for temporary occupation of land and economic displacement will be recorded and reported on separately from all other grievances.

In the first instance, grievances will be responded to by the Environmental and Social Manager, a nominated staff member of KWSC (exact title to be confirmed with the KWSC during consultation with EBRD), who will consult other relevant sectors/employees in the process as necessary. If the complainant is unsatisfied with the response, he/she can submit an appeal, which will be addressed by the appropriate KWSC management staff.

Grievances in relation to construction activities will be addressed by construction contractor(s) who will be contractually responsible for this and their management will be monitored by the nominated ES Manager. Residents of affected communities will be informed about the contractors' contact information before construction begins, through announcements in the premises of the local community offices and the media, where appropriate.

Contact details for contact the company, via phone, fax or mail (for central and regional offices) for the submission of grievances, as well as project information, can also be provided on leaflets available to local population.

6 Monitoring and Evaluation

This section presents an overview of how SEP activities will be monitored and reported. It is to be updated periodically to reflect applied stakeholders’ engagement process.

6.1 Implementation timetable

For specific stakeholder engagement activities planned, such as meetings or consultation periods, a schedule outlining dates and locations for these events will be provided including dates for when the key information will be available to the public, such as annual reports.

6.2 Stakeholder Register

All issues raised during the project implementation will be recorded in a logical and systematic way so that they can be tracked through to appropriate resolution and closure. The register will include the following information:

- Name and contact details (unless they request anonymity; in this case a code or reference number should be used);
6.3 Reporting

A summary report on the stakeholder engagement activities will be produced annually by the ES Manager and issued to EBRD. The summary report may remain internal or can be published on the KWSC website, as agreed with EBRD. The report would include separate sections for each region and would include information on the stakeholder engagement, public consultations planned and held, programme of disclosure of information and summary of the grievance process.

The report would include, among other things, the following information: number and type of communications; frequency of communications; number, type and source of complaints; number of resolved complaints and average time for resolution of complaints; number of presentations on environmental, social and economic status of the company; number of mass media articles and/or announcements; number of stakeholders involved per action; level/degree of involvement for each stakeholder; number of visitors on the website; number of requests for information via websites.

6.4 Monitoring and Evaluation of SEP

Once commitments have been made within an SEP, it is important to monitor their implementation and report on the status of the plan’s implementation, along with explanations for delays or changes.

KWSC will constantly monitor the engagement level of their stakeholders by developing a set of Key Performance Indicators which will include the following:

- SEP in place, up to date and available to the public for comment;
- All planned actions implemented as scheduled;
- Evidence of spot-check interviews with stakeholders to confirm awareness about the project and company activities;
- Grievance procedure operating as planned (as evidenced by an up-to-date grievance register) including recording;
- Contractors and subcontractors adopting the same system;
- Annual report on implementation of SEP and Grievance Process to be made available.
Appendix A

Sample Grievance Form
# Kafr El Sheikh Wastewater Project Public Grievance Form

<table>
<thead>
<tr>
<th>Reference No:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Name</td>
</tr>
</tbody>
</table>

## Contact Information

<table>
<thead>
<tr>
<th>Please mark how you wish to be contacted (mail, telephone, e-mail).</th>
<th>By Post: Please provide mailing address:</th>
</tr>
</thead>
<tbody>
<tr>
<td>By Telephone:</td>
<td></td>
</tr>
<tr>
<td>By E-mail</td>
<td></td>
</tr>
</tbody>
</table>

## Description of Incident or Grievance:

<table>
<thead>
<tr>
<th>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</th>
</tr>
</thead>
</table>

## Date of Incident/Grievance

| One time incident/grievance (date ____________) |
| Happened more than once (how many times? _____) |
| On-going (currently experiencing problem)       |

## What would you like to see happen to resolve the problem?

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
</table>

## Signature:

| _______________________________ |
| Date: _________________________ |

Please return this form to: [name], Health and Safety Manager, [company name].

Address __________________________: Tel.: ________________

or E-mail: _____@_____.com.

We will register your complaint and respond to you within ____ days and provide you with a contact telephone number.