

STAKEHOLDER ENGAGEMENT PLAN

Cairo Metro Line 1 Upgrade

Project Ref: 201803002

On behalf of:



European Bank
for Reconstruction and Development

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List of Acronyms that may be used in this report:

EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
SEC	Strategic Environmental Consulting Ltd.
BWC	Before Works Commence
CAA	Competent Administrative Authority
CBTC	Communications-Based Train Control
CCP	Operational Control System
CoMP	Contractor Management Plan
E&S	Environmental and Social
ECM	Egyptian Company for Metro Management & Operation
EEAA	Egyptian Environmental Affairs Agency
EHS	Environmental, Health and Safety
EHSS	Environmental, Health, Safety and Social
EIA	Environmental Impact Assessment
ENR	Egyptian National Railway
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESHS MS	Environmental, Social, Health and Safety Management System
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental & Social Management System
GHG	Greenhouse Gas
GIP	Good International Practice
H&S	Health and Safety
HSSE	Health, Safety, Social and Environmental
IA	Integrated Approach
ILO	International Labour Organization
LACF	Land Acquisition and Compensation Framework
LTA	Lender Technical Advisor
MMP	Management and Monitoring Plan
MMS	Management Maintenance System
MOT	Ministry of Transport
NAT	National Authority for Tunnels
NMP	Noise Management Plan
OHS	Occupational, Health and Safety
PID	Prior to Initial Disbursement
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PR	Performance Requirements
SEP	Stakeholder Engagement Plan

1 PROJECT DESCRIPTION

1.1 Background

The National Authority for Tunnels (NAT) of the Arab Republic of Egypt is planning a number of rehabilitation works across Cairo Metro Line 1 to accommodate for the increased ridership capacity, improve the level of service to cater for future demand, and decrease the current headway. Work includes urgent infrastructure investments in signalling, telecoms, controls and track works. This document is a **Project Stakeholder Engagement Plan (SEP)** that has been developed on behalf of NAT describing the proposed approach for public relations, stakeholder engagement and communication for the Cairo Metro Line 1 Upgrade Project. The SEP takes into account international good practice in relation to information disclosure and outlines the general engagement principles that NAT will adopt for the Project. The SEP should be considered a "living document" and will be reviewed periodically throughout the project execution and updated as considered necessary. This review process will also be triggered if key activities change or new activities relating to stakeholder engagement commence.

1.2 Objectives of the Plan

The European Bank for Reconstruction and Development (EBRD), together with the European Investment Bank (EIB) are considering providing financing to NAT in relation to the upgrade project. As a result, the Cairo Metro Line 1 Upgrade is required to meet the standards of the national laws, as well as those of the EBRD and EIB.

The EBRD's Environmental and Social Performance Requirements and EIB's Environmental and Social Performance Standards outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders over time, including with locally affected communities. The process of stakeholder engagement is an essential component of the appraisal, management and monitoring of the environmental and social issues associated with these investments.

The purpose of this SEP is to describe the strategy and programme for engaging with stakeholders in a culturally appropriate manner. The goal is to ensure the timely provision of relevant and understandable information and to create a process that provides opportunities for i) all stakeholders, including those who are vulnerable and/or socially excluded, to express their views and concerns, ii) NAT and its partners to consider and respond to them. 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. A range of key stakeholders has been identified in this document. If any stakeholders have not been identified, they should contact NAT and ask to be included in future information and communications.

This document also outlines how any concerns or grievances will be handled by NAT; provides an initial schedule for consultations and communications (this may be subject to revisions during procurement / implementation); and describes the resources available to implement the SEP.

1.3 Structure of the Plan

This remainder of this document is structured as follows:

- Chapter 2 – Project background
- Chapter 3 – Public consultations and information disclosure
- Chapter 4 – Identification of stakeholders and other affected parties
- Chapter 5 – Overview of current stakeholder engagement practices
- Chapter 6 – Stakeholder engagement programme and methods of engagement and resources
- Chapter 7 – Reporting and grievance mechanisms.

2 PROJECT BACKGROUND

The EBRD has developed an Integrated Approach (IA) to Cairo's urban transport sector which comprises a series of investments across all modes of urban transportation in Greater Cairo focusing on improving functionality, quality and efficiency of public transport services – particularly in response to current overcrowding and significant expected future growth in demand. The objective of the IA is to achieve greater commercialisation of services, enhanced private sector participation, improved regulation, and increased opportunities for on-the-job training as well as the use of carbon monetisation mechanisms.

As part of this, the EBRD, together with the EIB and other Lenders, are now considering the provision of sovereign loans to the Arab Republic of Egypt to the rehabilitation of the existing infrastructure of Cairo Metro Line 1, the total cost of which is estimated at approximately EUR 750 million. The EBRD proposed loan amounts to up to EUR 205 million (or USD equivalent). This will cover urgent infrastructure investments in signalling, telecoms, controls and track works. The proposed Line 1 upgrade project is the second of a series of investments presented under the IA. It is designed to provide the needed rehabilitation of Cairo Metro Line 1's existing infrastructure with the aim to restore it to its original design capabilities and reduce traffic headway (minimum possible time between two trains) to increase capacity, through system upgrades and the introduction of new signalling technology. The key technical target is to reduce the headway from current typical 3.5 – 5 minutes to its original specification of 2.5 minutes, with the potential for additional improvement to 2 minutes.

Accordingly, the project will enable the provision of safe, reliable and environmentally friendly transportation for up to 2 million passengers per day and provide energy efficiency and emissions savings.

Figure 1: Cairo Metro routes currently in service - Line 1 in red (Source: cairometro.gov.eg)



The proposed loan is intended to support the procurement of specific upgrade works to the Cairo Metro Line 1 infrastructure, in particular:

- Electromechanical elements
- Telecommunications
- Signalling (using communications-based train control (CBTC) track-side equipment)
- Centralised control
- Track and civil works.

The project will be implemented by the National Authority for Tunnels (NAT), a government agency under the jurisdiction of the Ministry of Transport (MOT). It will be carefully co-ordinated with the Egyptian Company for Metro Management & Operation (ECM) which is part of the Egyptian National Railway (ENR) and the day-to-day operator of the Cairo Metro, as the rehabilitation will take place whilst the line is in continuous operation.

The upgrade project will be awarded as a single turnkey contract commissioned by NAT for complete delivery of the above works, with all required integration between the different works components, the interface with existing facilities and systems and future migration to new systems.

Replacement and upgrade of rolling stock associated with Metro Line 1 is not included within the current financing proposals and is not considered within this project.

2.1 What Are the Key Impacts?

The upgrade will involve a range of activities that may affect the local communities and environmental conditions in and around the metro area and may also directly or indirectly affect the surrounding areas. The rehabilitation works will also result in temporary impacts that will affect users of the lines or those directly or indirectly dependent on the services rendered by these lines. The key impact areas include the following:

- Potential nuisance from the construction works, including noise, dust, air emissions and vibrations
- Traffic disruption and community disturbance from road movements associated with the upgrade works, especially connected to the project laydown areas and the removal and replacement of large quantities of track ballast
- Worker, neighbour and receptor hazards from storage, recycle, disposal of waste and scrap materials from the construction and replacement activities
- Normal operational services of the Metro being disrupted by overrunning night-time works
- In the longer-term, increased passenger numbers leading to over-crowding in stations and the surrounding areas.

3 CONSULTATION AND DISCLOSURE

Public consultation and information disclosure undertaken by NAT will need to comply with the requirements of Egyptian legislation and best international practice, as described in the requirements of the EBRD and the EIB (together the “Lenders”).

3.1 National Regulatory Context

The scope of the Line 1 upgrade project does not involve any change or variation in the route of the metro line and it does not involve the construction of new facilities; therefore the project does not require an Environmental Impact Assessment (EIA) or public consultations under current Egyptian legislation (Environmental Law 4/1994, amended by law 9/2009).

3.2 EBRD and EIB Requirements

Stakeholder engagement is an essential requirement of the EBRD’s Performance Requirements (PRs). PR 10: *Information Disclosure and Stakeholder Engagement*, highlights the need for on-going stakeholder engagement, which should be meaningful and unbiased. The findings of the stakeholder engagement should also be communicated as outlined in this SEP which has been developed commensurate to the nature of the proposed investment and the associated environmental and social impacts and benefits, as well as the level of anticipated public interest. An outline programme of engagement has been developed and will be further enhanced and rolled out once the Main Contactor is selected. This will include details of locations and timings of construction activities to be undertaken along Line 1.

Stakeholder engagement is also an essential element of the EIB’s Environmental and Social Performance Standards (2013) and especially Performance Standard 10 on Stakeholder Engagement. Amongst other things this defines requirements for “a meaningful engagement process” which “allows for the efficient implementation of a financed operation and, in particular, the early and effective identification, assessment, and management of any environmental and social risks, impacts, and opportunities”. It also requires the views, interests, and concerns of project affected communities and other interested stakeholders to be heard, understood, and taken into account throughout the project lifecycle.

3.3 Best 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.

4 STAKEHOLDER IDENTIFICATION

4.1 Identification of Main Stakeholders

This section of the document identifies potential stakeholders for the Upgrade Project affected at a local, district, regional, national and international level.

The Lenders consider stakeholder engagement as fundamental to good business practices and corporate citizenship. Moreover, it provides a means for improving the overall quality of the projects. In particular, effective community engagement is central to managing risks and impacts as well as achieving enhanced community benefits. Stakeholders may include individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way and that wish to express their views. The following definitions have been applied in this plan:

- **Key stakeholders:** any stakeholders with significant influence on or significantly impacted by the work and whose interests and influences must be recognised if the work is to be successful, and
- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of a body of work.

A diverse range of stakeholders will be involved in the proposed project. Stakeholders have been, and will continue to be, identified on an on-going basis by:

- Identifying people or communities that are or could be affected by the project, along with other interested parties
- Ensuring that these stakeholders are appropriately engaged in environmental and social issues through a process of meaningful consultation and information disclosure.

If stakeholders are not on the list below and would like to be kept informed about the project, contact should be made with NAT staff with responsibilities for stakeholder communications.

4.2 Key Stakeholders Identified During Plan Development

Key stakeholders associated with the project are given in overview in Figure 2 and have been further identified in Table 1 below.

Once stakeholders are identified, a primary analysis is applied to identify their respective level of engagement. The stakeholder analysis tool is used to group stakeholders according to their effect and support pertaining to the project.

Figure 2: Overview of Key Stakeholders

KEY STAKEHOLDERS



Table 1: Detailed Stakeholder List

CATEGORIES	STAKEHOLDER GROUPS	ROLE & RELEVANCE
<i>Primary Stakeholders</i>		
Financial Institutions	European Bank for Reconstruction and Development, EIB & other lenders	<ul style="list-style-type: none"> Financiers and regulators
Governmental Agencies	Cairo Governorate	<ul style="list-style-type: none"> Responsible for supporting the project by providing its various needed permissions
	District Authorities	Responsible for: <ul style="list-style-type: none"> Providing relevant permissions and authorisations for project implementation Dealing with irregularities and problems outside the metro stations (such as vendors and waste) through the local government units

CATEGORIES	STAKEHOLDER GROUPS	ROLE & RELEVANCE
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
	ECM	<ul style="list-style-type: none"> Responsible for running the operations of the Metro, and handling related grievances
Contractors	Main Contractor	<ul style="list-style-type: none"> Responsible for managing the design, engineering, procurement and construction works for the project
Environmental Sector	Ministry of Environment -Egyptian Environmental Affairs Agency (EEAA)	<ul style="list-style-type: none"> Responsible for reviewing and approving ESIA's as well as monitoring the implementation of the Environmental Management Plan
	Environmental Office within the governorate	<ul style="list-style-type: none"> Responsible for monitoring compliance to environmental requirements
Other Governmental Agencies	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 Interior	<ul style="list-style-type: none"> Responsible for policing the metro stations and their platforms
	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
	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
	Ministry of Endowments	<ul style="list-style-type: none"> Responsible for providing religious guidance services for metro passengers (new service within the underground stations)
	Arab Organization for Industrialization	<ul style="list-style-type: none"> The Egyptian entity responsible for manufacturing metro vehicles and its spare parts
	Civil Protection Department	<ul style="list-style-type: none"> Responsible for safety in the stations and the corresponding establishments for operations and control

CATEGORIES	STAKEHOLDER GROUPS	ROLE & RELEVANCE
Potentially Affected Passengers and Communities along the Route of Metro Line 1	Metro Line 1 passengers	<ul style="list-style-type: none"> Individuals that will be impacted (positive/negative) by the project
	Young people (age 18 -35 years)	<ul style="list-style-type: none"> Constitute the largest category of metro users and so are strongly vested
	Women	<ul style="list-style-type: none"> Given their vulnerable status, they might be more affected by the project's positive or negative impacts
	Elderly and disabled persons	<ul style="list-style-type: none"> Given their vulnerable status, they might be more affected by the project's positive or negative impacts
	Community Leaders (heads of districts and local units)	<ul style="list-style-type: none"> Community leaders of the affected communities, who will be responsible for interfacing between those involved in the project activities and their community members
Workers in Metro Stations and Drivers	Station chiefs, stationmasters, and their assistants - Head of tickets' offices and cashiers – Janitorial staff - Queen Security	<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	Queen Company for Hygiene and Safety	<ul style="list-style-type: none"> Responsible for cleaning the stations and establishments for NAT
	Life Company for Medical Care Services	<ul style="list-style-type: none"> Responsible for providing medical care services to the employees of NAT and ECM
<i>Secondary stakeholders</i>		
Media	TV Radio Social Media	<ul style="list-style-type: none"> Disclosure of information about the project
Civil society	Local NGOs at the regional and headquarter levels as well as local Community Development Associations	<ul style="list-style-type: none"> Responsible for sharing information with the community
Suppliers and Traders	Private companies	<ul style="list-style-type: none"> Mainly potential tenderers for the construction works
	Traders and small-scale vendors	<ul style="list-style-type: none"> Provide workers with food and amenities.
Academic sector	Academics (university institutes)	<ul style="list-style-type: none"> May play a role in enriching E&S studies as well as proposing corrective procedures

5 STAKEHOLDER ENGAGEMENT PROGRAMME

5.1 Previous Stakeholder Engagement Activities

Public consultation activities have not previously taken place for Cairo Metro Line 1, either in its original construction phase or in subsequent operational phases. NAT and ECM do participate in periodic meetings with key stakeholders such as the Ministry of Electricity, the Ministry of Interior, Ministry of Civil Defence, Ministry of Finance, as well as with directors of relevant departments such as public relations and media. These meetings have focussed on consultation between the various stakeholders responsible for decision-making and management, discussing the various problems, and taking the necessary measures to resolve issues.

There has also been some, albeit limited, disclosure and circulation of information regarding development and management of the Cairo metro system. NAT discloses information related to new projects, development projects and modernization updates through the official website of the Authority [www.nat.org.eg], along with various media outlets, in order to reach its varied stakeholder groups. A very limited number of informal meetings have also occurred with representatives of the public using the metro, although these have not been structured in the context of a formal consultation.

5.2 Future Engagement Activities

Communication records will be maintained by NAT clearly logging the key information provided to stakeholders and also the key incoming communications into NAT (i.e. general questions, complaints, and queries via its main feedback channels - www.nat.org.eg/english/contactus.html) along with a summary of the actions taken. For all NAT's stakeholder engagement activities the following information will be recorded on an on-going basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, newspapers etc.), and how it was released or distributed
- Locations and dates of meetings undertaken
- Individuals, groups, and / or organisations consulted
- Key issues discussed and key concerns raised
- Response to issues raised, including any commitments or follow-up actions
- Process undertaken for documenting these activities and reporting back to stakeholders.

A **stakeholder engagement records table** will be kept up to date on all public consultation and information disclosure that is undertaken for the current and future projects.

The types of information disclosed and the specific method of communication to be undertaken by NAT for the project are summarised in the Stakeholder Engagement Programme in Table 2 below. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation. For this project, information that is proposed to be communicated is provided below.

5.3 The Future Programme

Information communication locations will be designated at key positions along Line 1 and these will include notice boards in the metro stations and relevant local community locations as required.

NAT will collate any comments and feedback associated with this and future projects and will document these. All comments received will be reviewed in accordance with the key principles of 'Good International Practice'. All communications will be reviewed for relevance, practicality and viability to make improvements in response to the feedback, and the communicator will be informed of the outcome.

The future programme of stakeholder engagement activities is presented below which will be reviewed and updated by NAT on an on-going basis.

Table 2: Future Communications Activities

STAKEHOLDER GROUP	INFORMATION DISCLOSED	MEETING / COMMUNICATION TYPE
<i>Annual Reporting to Investors</i>		
Lenders	Annual reports of social development, environmental protection and implementation of Stakeholder Engagement Plan including resolution of grievances associated with the project.	One year after loan signing agreement / reports provided annually comprising: <ul style="list-style-type: none"> • ESAP status • Resolution on grievances
<i>Regular Engagement with Metro Users, Local Community and Wider Audience</i>		
Users Communities Public Groups Government Agencies Internal Employees Media	NAT development plans and news: <ul style="list-style-type: none"> • Changes to the service / facilities • Nuisance / environmental issues • Planned upgrades / changes • Accidents and incidents • Safety initiatives 	Informative announcements and press statements in local papers, local TV and potentially state level media Distribution of information at train stations, on community notice boards and through loud speaker announcements
<i>Appointment of Main Contractor and Related Procurement for the Upgrade Project</i>		
Contractors Operational Suppliers Communities Internal Employees Media Potential New Hires	Tender documents for Line 1 upgrade Award of contracts Job opportunities Changes / improvements to the service	Advertisements in press, trade journals Announcement in the local newspaper and on local radio Internal communications Distribution of information at train stations, on notice boards and through loud speaker announcements
<i>Line Construction</i>		
Company Employees General Communities Public Groups Media Potential New Hires	Internal briefing for employees through team meetings and senior management meetings Notice boards within community to be identified Press releases and statements Job opportunities Announcement in local newspaper and on local radio	Schedule of construction works, activities and progress of construction Training Code of Conduct Nuisance mitigation measures Internal communications Distribution of information at train stations, on notice boards and through loud speaker announcements

STAKEHOLDER GROUP	INFORMATION DISCLOSED	MEETING / COMMUNICATION TYPE
<i><u>Commissioning of the Upgraded Service</u></i>		
General Communities Media Potentially Affected Suppliers /Services	Announcements in the local newspaper and on local radio Distribution of information at train stations, on notice boards and through loud speaker announcements External communications	Update of passenger information with details of changes to service/facilities Promotion of the benefits of the improved service to promote passenger usage. Communication to other services / facilities that could expect an increase in usage e.g. car parks / areas of street parking near metro stations.

6 REPORTING AND GRIEVANCES

6.1 Monitoring, Reporting and Feedback Mechanisms

Through communication channels such as its main feedback routes - www.nat.org.eg/english/contactus.html - as well as local media and community feedback, NAT will monitor and provide responses as appropriate. The information will be recorded by NAT so that a response and feedback can be made to stakeholders.

A **stakeholder engagement records table** will be kept up to date on all public consultation, information disclosure, feedback received and responses provided for the current and future projects as described in Section 5.2.

6.2 Grievance Mechanism

A grievance mechanism will be adopted, based on the general flow chart in Figure 3. The grievance form presented in Appendix A will be used as required to handle grievances from employees, contractors and external stakeholders. The assessment of grievances will be carried out in accordance with Egyptian Law and Good International Practice and responses will be provided within one month of the grievance being lodged.

The mechanism will be as follows:

- Grievance received and recorded in a register
- For an immediate action to satisfy the complaint, the complainant will be informed of corrective action
- Implement corrective action, record the date and close case
- For a long-duration corrective action, the complainant will be informed of proposed action
- Implement corrective action, record the date and close case

A grievance should be recorded by the complainant using the grievance form in Appendix A, ensuring that contact details are provided with the preferred method and language of communication. A clear description should be provided of the incident or grievance. NAT will respond to grievances within one month of receiving the form.

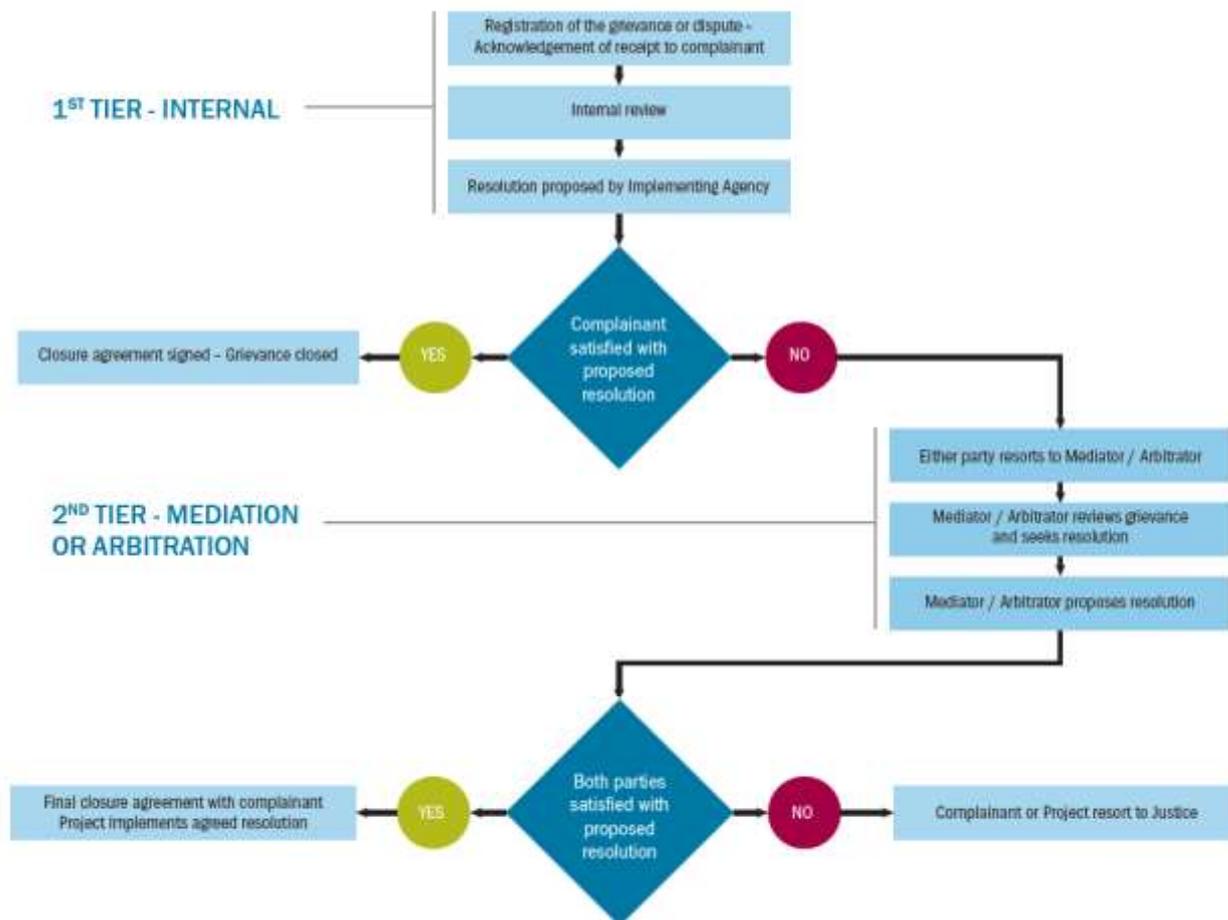
Grievances can be received by mail, fax or email – see www.nat.org.eg/english/contactus.html.

6.3 Roles and Responsibilities

NAT will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments/complaints, and responding to any such comments and complaints.

Details of who will respond to grievances will be shared when available via an updated version of this Stakeholder Engagement Plan.

Figure 3: Typical Grievance Management Flow Chart (EBRD, 2012)



APPENDIX A: Public Grievance Form

Reference No:	
Full Name <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Arabic <input type="checkbox"/> English <input type="checkbox"/> Other (please specify)
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], [role], [company name],

Address _____: Tel.: _____ or E-mail: _____