Egypt: Second Integrated Sanitation and Sewerage Infrastructure Project
## From Safeguards to E&S Standards

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### ESS STANDARDS

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**Category B**

**Substantial Risk**
Context
The main components of the project are (i) Wastewater infrastructure systems in rural areas within the two Delta Governorates of Menoufia and Sharkeya; and (ii) Wastewater infrastructure systems in rural areas within the two Upper Egypt Governorates of Assiut and Sohag (wastewater treatment plants and/or collection networks connection-gravity sewers, pump stations). Project activities are expected to produce substantial positive social impacts as it will improve access to sanitation and sewerage services, as well as improve environmental conditions of the rural poor.

Project facts
Objectives: The project development objective is to provide the targeted population in the Governorates of Menoufia, Sharkeya, Assiut and Sohag increased access to improved sanitation and sewerage services.

Financing (US$): 200 m

Environmental Category: B

Safeguards Triggered: Environment Assessment (OP 4.01), Involuntary Resettlement (OP 4.12)

Safeguards Instruments: Environmental and Social Assessment Framework (ESIAF), and Resettlement Policy Framework (RPF)

Approved: June 2011
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts

- Possible cost savings:
  - possibility of relying on Borrower Framework
  - risk classification changed and evolves over time and no need of formal restructuring
- ESS 1 introduces a clearer definition of Associated Facilities
- Under the proposed ES Framework, the requirement of social impact assessment becomes more focused, and includes specific reference to vulnerable groups and some new issues (such as labor).
- Clear requirement to apply EHSG (specific requirements set forth in General EHSG and EHS Guidelines for Water and Sanitation); not referenced under current project
- The preparation of the ESCP would entail minor effort as this is basically a procedural aspect, and it specifies/refers to other instruments. That is, this is a process of formalizing in a different manner elements/documents that we already have now.
- Requirement to incorporate requirements in tender documents with contractors and sub-contractors: done in practice under current Project
- Assessment of risks related to primary suppliers: not expressly required under current Project
- The expected additional level of effort is moderate
ESS 2: Labor and Working Conditions

- This Policy has not been applied in the past and is expected to need efforts on the part of the borrower to provide information to the bank and assist with Bank due diligence process.
- This ESS would apply in varying degrees to direct workers, contracted workers and potentially primary supply workers in this project.
- The principles of Occupational Health and safety (OHS) were already applied in this project.
- This standard includes recognition of the workers’ right to organize, right to equitable treatment, prohibition of forced labor and child labor. Baseline information would be required to make a determination of the applicability of the standard.
- A grievance redress mechanism for all project workers would be required to be established.
- The borrower would be responsible to set in place procedures for monitoring of this ESS.
- The expected additional level of effort is moderate to substantial.
ESS3: Resource Efficiency and Pollution Prevention and Management

- Potential incremental effort to apply resource efficiency measures if project is significant user of energy, water or raw materials. Some assessment of the infrastructure systems would be needed as is generally the case now.
- Obligation to minimize release of pollutants in accordance with national law and EHSG (specific requirements set forth in General EHSG and EHS Guidelines for Water and Sanitation
- More detailed requirements regarding management of hazardous and non-hazardous waste in ESS and in EHSG.

The expected additional level of effort is moderate
ESS 4: Community Health and Safety

• ESS 4 requires avoidance of risks and impacts on health, safety and security of project affected communities

• Establishes requirements of structural design safety in accordance with EHSG and GIIP, taking into account climate change considerations and risks to the public; independent expertise required for projects in high risk locations

• Requirement to identify, evaluate and monitor potential road and traffic safety risks: incremental effort needed.

• Requirement to identify in EA project risks and impacts on ecosystem services: not likely to apply under this Project.

• Requirements regarding management and safety of hazardous materials, communities exposure to water borne, water based, communicable & non-communicable disease that could result from project activities or associated with presence of project labor: incremental effort needed

• Requirements regarding emergency preparedness and preparation of Risk Hazard Assessment (RHA) and Emergency Response Plan (ERP) for project with the potential to generate emergency events

• The expected additional level of effort is low to moderate.
There is no significant change in this standard from the current policy (Operational Policy 4.12).  

The project meets all the requirements of the standard in terms of work already completed under the current policy, such as holding of consultation with stakeholders, preparation of resettlement framework, provision of a grievance redress mechanism, disclosure of information etc.

• Clearer criteria on voluntary land acquisitions and provisions regarding land purchased by Gvt in anticipation of the Project, and prohibition on forced evictions.
• Consultations would require more specific effort to ensure involvement of vulnerable groups
• The expected additional level of effort is none to low.
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

- The project is not financing any activities that would cause impacts on natural habitat or forests.
- New: need to consider impacts on ecosystem services and living natural resources as related to affected communities: most likely not relevant for this Project.
- No additional effort is required for this ESS.
ESS 7: Indigenous Peoples
ESS 8: Cultural Heritage
ESS 9: Financial Intermediaries

ESS7
- OP 4.10 not triggered for Project
- No additional effort is required for this ESS.

ESS8
- There is no cultural property identified in the project area.
- Bid documents continue to require a “chance find” clause
- New requirement on intangible CH
- No additional effort is required for this ESS.

ESS9
- There are no FIs in the project and hence no incremental efforts would be required.
- No additional effort is required for this ESS.
ESS 10: Stakeholder Engagement and Information Disclosure

- Under the new ESS 10, stakeholder engagement for the E&S impacts and their mitigation would be more systematic and an on-going activity over the life of the project. Some effort would be required to prepare a Stakeholder Engagement Plan (SEP) where currently, stakeholder consultation is covered in the E&S assessment and the mitigation plans.

- Currently the project has a grievance redress mechanism in place to respond to complaints. Scope of GRM would need to be extended to grievances related to all aspects of the Project. Some minor effort may be required to disclose information about the status of resolution of all grievances.

- The expected additional level of effort is moderate.
THANK YOU

More information available at: