



THE ALEXANDRIA
RAML TRAM
REHABILITATION
PROJECT

Resettlement Policy
Framework



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|---------------------------------|---|------------------|--------------------------------|
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Reference Documents

1. Contract 101M - Alexandria Raml Tramway effective as of 04 October 2020
2. NAT, Notice to Proceed Letter dated 23 September 2020
3. Quality Management System Standard (ISO 9001 Standard: 2015): Quality Management systems requirements.
4. Master Plan – RG 150322
5. IFC Handbook for Preparing a Resettlement Action Plan

TABLE OF CONTENTS

| | |
|---|-----------|
| EXECUTIVE SUMMARY | IV |
| 1. INTRODUCTION | 1 |
| 1.1 PREAMBLE | 1 |
| 1.2 PURPOSE AND OBJECTIVES OF THE RESETTLEMENT POLICY FRAMEWORK DOCUMENT | 2 |
| 1.3 METHODOLOGY OF THE RESETTLEMENT POLICY FRAMEWORK | 3 |
| 1.4 PROJECT DESCRIPTION | 5 |
| 1.4.1 PROJECT JUSTIFICATION: | 7 |
| 1.4.2 CONSTRUCTION ACTIVITIES: | 7 |
| 1.4.3 BUFFER ZONE: | 8 |
| 1.4.4 CONSTRUCTION TIME FRAME | 8 |
| 1.4.5 OPERATIONAL MANAGEMENT OF STATIONS: | 9 |
| 1.4.6 CURRENT STATUS OF RAML TRAM AND POTENTIAL ENHANCEMENTS | 9 |
| 1.4.7 PROJECT EFFORTS TO REDUCE DISPLACEMENT | 14 |
| 1.5 STRUCTURE OF THE REPORT | 16 |
| 2. INSTITUTIONAL AND LEGAL FRAMEWORK | 17 |
| 2.1 APPLICABLE NATIONAL LEGAL FRAMEWORK | 17 |
| 2.1.1 EGYPTIAN CONSTITUTION (2014) | 17 |
| 2.1.2 LAND ACQUISITION LAWS | 18 |
| 2.2 APPLICABLE EIB, WB AND AFD POLICES AND STANDARDS | 18 |
| 2.2.1 EIB ENVIRONMENTAL AND SOCIAL STANDARDS (OCTOBER 2018) | 18 |
| 2.2.2 AFD APPLICABLE LEGISLATIONS PERTAINING TO INVOLUNTARY RESETTLEMENT AND WORLD BANK ESS 5 AND 10 | 19 |
| 2.2.3 GAPS BETWEEN NATIONAL AND INTERNATIONAL LEGISLATIONS AND PROPOSED MECHANISMS TO BRIDGE THE GAPS | 21 |
| 2.3 EGYPTIAN INSTITUTIONAL FRAMEWORK | 30 |
| 2.4 PROPERTY LAWS AND REGULATIONS IN EGYPT | 33 |
| 3. PROJECT AFFECTED PEOPLE SOCIOECONOMIC BASELINE DESCRIPTION | 34 |
| 3.1 OVERVIEW | 34 |
| 3.2 METHODOLOGY OF BASELINE SURVEY | 36 |
| 3.3 TENANTS OF SHOPS/ KIOSK | 37 |
| 3.3.1 AGE CATEGORIES | 38 |
| 3.3.2 HOUSEHOLD SIZE | 38 |
| 3.3.3 EDUCATIONAL STATUS | 39 |
| 3.3.4 OCCUPATIONAL STATUS | 40 |

| | | |
|------------|---|-----------|
| 3.3.5 | ECONOMIC DEPENDENCY AND MONTHLY REVENUE | 41 |
| 3.3.6 | ACCESS TO ELECTRICITY AND WATER SUPPLY | 43 |
| 3.3.7 | MONTHLY SHOP LEASE VALUE | 43 |
| 3.3.8 | AVAILABILITY OF TAX REGISTER AND COMMERCIAL REGISTER | 44 |
| 3.3.9 | HEALTH BURDEN | 45 |
| 3.4 | WORKERS SOCIOECONOMIC BASELINE | 45 |
| 3.4.1 | WORKERS' AGE CATEGORIES | 46 |
| 3.4.2 | WORKERS' EDUCATIONAL ATTAINMENT | 46 |
| 3.4.3 | WORKERS' EMPLOYMENT ARRANGEMENT | 47 |
| 3.4.4 | WORKERS' MARITAL STATUS | 48 |
| 3.4.5 | WORKERS' INSURANCE | 48 |
| 3.4.6 | WORKERS OF MOSQUE | 48 |
| 3.5 | MOBILE AND SEMI-MOBILE STREET VENDORS | 49 |
| 3.6 | HOMELESS AND STREET CHILDREN | 52 |
| 3.6.1 | HOMELESS | 52 |
| 3.6.2 | STREET CHILDREN | 53 |
| 3.7 | MOSQUE IN BAKOUS | 54 |
| 3.8 | VULNERABLE GROUPS | 55 |
| 4. | PROJECT ADVERSE IMPACTS | 57 |
| 4.1 | POTENTIAL TEMPORARY ECONOMIC DISPLACEMENT (CONSTRUCTION PHASE) | 57 |
| 4.1.1 | OVERVIEW | 57 |
| 4.1.2 | IMPACTS ON SHOPS TENANTS AND WORKERS | 57 |
| 4.1.3 | IMPACTS ON MOBILE AND SEMI-MOBILE STREET VENDORS | 58 |
| 4.1.4 | IMPACTS ON TRANSPORT OPERATORS | 59 |
| 4.2 | PERMANENT DISPLACEMENT (CONSTRUCTION AND OPERATION PHASE) | 60 |
| 4.2.1 | OVERVIEW | 60 |
| 4.2.2 | SHOPS TENANTS AND LABOURERS | 61 |
| 4.2.3 | MOSQUES | 65 |
| 4.2.4 | STREET CHILDREN AND HOMELESS PEOPLE | 66 |
| 4.2.5 | IMPACTS ON OTHER MEANS OF TRANSPORTATION | 67 |
| 5. | ELIGIBILITY, ENTITLEMENT AND CUT-OFF DATE | 69 |
| 5.1 | CUT-OFF DATE | 69 |
| 5.2 | ELIGIBILITY | 69 |
| 5.3 | ENTITLEMENTS | 75 |
| 6. | COMPENSATION, INCOME RESTORATION AND RESETTLEMENT ASSISTANCE | 88 |
| 6.1 | COMPENSATION FOR THE SHOPS/RESTAURANTS/ KIOSKS IN STATIONS: | 88 |
| 6.2 | COMPENSATION FOR THE TEMPORARY IMPACTS ON TENANTS, EMPLOYEES AND OWNERS OF SHOPS ALONG THE ROW EXPERIENCING FULL LOSS OF ACCESS: | 90 |

| | | |
|---|---|------------|
| 6.3 | COMPENSATION FOR MOSQUES: | 91 |
| 6.4 | COMPENSATION FOR WORKERS: | 92 |
| 6.5 | STREET CHILDREN REMEDIAL ACTIONS | 94 |
| 6.6 | HOMELESS PEOPLE REMEDIAL ACTIONS: | 95 |
| 6.7 | VALUATION OF COMPENSATION AND TRANSITIONAL SUPPORT | 96 |
| <hr/> | | |
| 7. | <u>PUBLIC CONSULTATION AND DISCLOSURE ARRANGEMENTS</u> | 100 |
| 7.1 | LEGAL FRAMEWORK | 100 |
| 7.1.1 | NATIONAL REGULATIONS | 100 |
| 7.1.2 | INTERNATIONAL REQUIREMENTS | 100 |
| 7.2 | CONSULTATION ACTIVITIES DURING RPF PREPARATION | 102 |
| 7.3 | CONSULTATION ACTIVITIES DURING RPF PREPARATION | 109 |
| 7.4 | ENGAGEMENT DURING RAP PREPARATION PHASE | 109 |
| 7.5 | ENGAGEMENT DURING RAP IMPLEMENTATION PHASE | 110 |
| 7.6 | GRIEVANCE MANAGEMENT | 111 |
| 7.6.1 | NAT 'S CURRENT COMMUNITY GRIEVANCE MECHANISM | 111 |
| 7.6.2 | PROPOSED COMMUNITY GRIEVANCE MECHANISM | 113 |
| 7.7 | RECORD KEEPING | 118 |
| 7.8 | DOCUMENTS FOR DISCLOSURE | 118 |
| 7.9 | MONITORING OF GRIEVANCES | 119 |
| 7.10 | CONFIDENTIALITY | 119 |
| 7.11 | GM SENSITIVE TO GENDER | 120 |
| 7.12 | PROCEDURE FOR APPEAL | 121 |
| <hr/> | | |
| 8. | <u>MONITORING AND EVALUATION</u> | 122 |
| 8.1 | OVERVIEW | 122 |
| 8.2 | INTERNAL MONITORING | 123 |
| 8.3 | EXTERNAL MONITORING AND EVALUATION | 124 |
| 8.4 | INDICATORS TO BE USED FOR INTERNAL AND EXTERNAL MONITORING | 125 |
| <hr/> | | |
| 9. | <u>IMPLEMENTATION</u> | 128 |
| 9.1 | ROLES AND RESPONSIBILITIES OF NAT | 128 |
| 9.2 | ROLES AND RESPONSIBILITIES OF OTHER ENTITIES | 129 |
| 9.3 | CAPACITY BUILDING | 131 |
| 9.4 | SCHEDULE | 135 |
| 9.5 | BUDGET | 136 |
| <hr/> | | |
| <u>LIST OF ANNEXES</u> | | 138 |
| <hr/> | | |
| ANNEX 1: LIST OF SHOP TENANTS AND THEIR CONTRACTS DURATION | | 138 |
| <hr/> | | |
| 101M-T2-LAQ-REP-GEN-0025 | Resettlement Policy Framework | |
| Rev. 2 | | |

| | |
|---|------------|
| ANNEX 2 : MAPS PRESENTING SOME PROJECT AFFECTED ASSETS' LOCATIONS | 138 |
| ANNEX 3: LIST OF PHOTOS PRESENTING PROJECT AFFECTED ASSETS AND THEIR COORDINATES | 138 |
| ANNEX 4: LEASE CONTRACT | 138 |
| ANNEX 5: CONSULTATION ACTIVITIES | 138 |
| ANNEX 6: SOME MAPS OF THE PAPs | 138 |
| ANNEX 7: SOCIAL SOLIDARITY LETTER - RAML TRAM | 138 |
| ANNEX 8: NAT LETTER TO APTA ABOUT NOT LEASING SHOPS AFTER CUT-OFF DATE | 138 |
| ANNEX 9: CLARIFICATIONS FROM APTA ABOUT LEASING SHOPS AFTER THE CUT-OFF DATE | 138 |
| ANNEX 10: DESCRIPTION CARDS OF RAML TRAM PROJECT | 138 |
| ANNEX 11 VALUE OF RENTED SHOPS | 138 |
| ANNEX 12: PUBLIC INTEREST DECREE MEMO - RAML TRAM | 138 |
| ANNEX 13 SIDI GABER NORTH LOOP EXCLUSION | 138 |
| ANNEX 15 MINIMUM WAGE DECREE | 138 |
| ANNEX 16 PHOTO LOG OF ALL SHOPS | 138 |
| ANNEX 17 TOTAL REVENUE OF EACH SHOP | 138 |
| ANNEX 18-RAML UPDATED TIME PLAN | 139 |
| ANNEX 19 LAND ACQUISITION DECREE | 139 |
| ANNEX 20 DOCUMENTS OF THE NGO RUNNING THE MOSQUE | 139 |
| ANNEX 21 DISCLOSED LAND ACQUISITION DECREE IN THE NATIONAL PRESS | 139 |
| ANNEX 22 RESETTLEMENT HANDBOOK | 139 |

List of Figures

| | |
|---|----|
| <i>Figure 1-1: Hoarding</i> | 7 |
| <i>Figure 1-2: Layout of the Existing Raml Tram line with stations</i> | 12 |
| <i>Figure 1-3 Proposed Corridor of the Rehabilitated Raml Tram Route</i> | 13 |
| <i>Figure 1-4: Avoided assets in Sidi Gaber station</i> | 15 |
| <i>Figure 3-1: Tenant of shop</i> | 34 |
| <i>Figure 3-2: Sales persons in a shop</i> | 34 |
| <i>Figure 3-3: Mobile vendors</i> | 35 |
| <i>Figure 3-4: Semi mobile vendors</i> | 35 |
| <i>Figure 3-5: Homeless street children</i> | 35 |
| <i>Figure 3-6: A mosque</i> | 35 |
| <i>Figure 3-7: Examples of shops located outside the stations and RoWs</i> | 36 |
| <i>Figure 3-8: Microbuses within the area of influence in Mansheya</i> | 36 |
| <i>Figure 3-9: Tuk tuks and taxi drivers within the area of influence</i> | 36 |
| <i>Figure 3-10: A Small kiosk located in San Stephano station</i> | 38 |
| <i>Figure 3-11: Example of a shop in a station</i> | 38 |
| <i>Figure 3-12: Percentage Distribution of PAPs by Age Categories and Type of Contract</i> | 38 |
| <i>Figure 3-13: Percentage Distribution of PAPs by Total Number of Household Members</i> | 39 |
| <i>Figure 3-14: Percentage Distribution of PAPs by their Educational Level</i> | 40 |
| <i>Figure 3-15: Percentage Distribution of PAPs by their Main Occupation</i> | 41 |
| <i>Figure 3-16: Percentage Distribution of Tenant PAPs by the Monthly Revenue of Similar Business</i> | 42 |
| <i>Figure 3-17: Percentage Distribution of PAPs by Change in Income during 2020-2021</i> | 43 |
| <i>Figure 3-18: Percentage Distribution of PAPs by the Value of Monthly Lease</i> | 44 |

| | |
|---|-----|
| Figure 3-19: Percentage Distribution of PAPs by the Availability of Tax Register and Commercial Register | 45 |
| Figure 3-20: Distribution of workers sample by age category | 46 |
| Figure 3-21: Distribution of workers sample by educational level | 47 |
| Figure 3-22: Distribution of workers sample by employment arrangements | 48 |
| Figure 3-23: Goods are put on a reed box | 51 |
| Figure 3-24: Women purchasing from green grocer (street vendor) | 51 |
| Figure 3-25: Male street vendor in Bakous station | 51 |
| Figure 3-26: Female street vendor in Bakous station | 51 |
| Figure 3-27: Ministry of Social Solidarity support initiative to street children and homeless people | 53 |
| Figure 3-28: Street beggar | 53 |
| Figure 3-29: Mosque in Bakous station | 55 |
| Figure 4-1: Shoes polisher in Bolkly station | 59 |
| Figure 4-2: Fixed street vendor | 59 |
| Figure 4-3: Street vendors standing by the fence of Metro line three phase three in Cairo | 59 |
| Figure 4-4: Sample of street crossing close to El Shoban El Moslemein | 60 |
| Figure 4-5: Kiosk in Roushdy station | 62 |
| Figure 4-6: Shop in Bakous station | 62 |
| Figure 4-7: a shop used as a garden in Bakous station | 63 |
| Figure 4-8: A mosque in Bakous (built instead of shops) | 63 |
| Figure 4-9: Small informal shop in Victoria | 63 |
| Figure 4-10: A shop used as toilet facility in Victoria | 63 |
| Figure 4-11: Big mosque that was constructed instead of shops owned by APTA (first mosque) | 66 |
| Figure 4-12: The mosque from outside (first mosque) | 66 |
| Figure 4-13: Small informal mosque in Victoria (second mosque) | 66 |
| Figure 4-14: The small mosque from outside (second mosque) | 66 |
| Figure 4-15: Street children in Sidi Gaber station | 67 |
| Figure 4-16: Homeless person in Raml station | 67 |
| Figure 7-1: NAT Current Community Grievance Mechanism | 112 |

List of Tables

| | |
|--|----|
| Table 0-1: Project Affected Assets, Lands and People | V |
| Table 0-2: Summary of Eligibility Criteria and Entitlement | 12 |
| Table 1-1: Project Affected Assets, lands and people | 6 |
| Table 1-2: Current Status of Raml Tram and Potential Enhancements | 9 |
| Table 1-3: List of avoided shops and NGOs | 14 |
| Table 2-1: Gaps between National and International legislations and proposed mechanisms to bridge the gaps in Alexandria Raml Tram Rehabilitation Project | 22 |
| Table 2-2: Institutional Arrangement of the Project | 31 |
| Table 2-3: Types of real property rights and methods of transferring ownership | 33 |
| Table 4-1: Project Affected Assets segregated by Tram Station | 61 |
| Table 4-2: Project Affected Assets segregated by type of activity | 63 |
| Table 4-3: Percentage Distribution of distribution of shops by the total footprint of shop and station in square meter | 65 |
| Table 5-1: Summary of the Project Affected People (Permanent and Temporary displacement) | 71 |

| | |
|---|-----|
| Table 5-2 : Entitlement Matrix | 76 |
| Table 6-1: Valuation of compensation and transitional support | 97 |
| Table 7-1: Previous Stakeholder Engagement – Preparation of the RPF and updating the ESIA | 102 |
| Table 7-2: Main Outcomes of Consultation Activities to Date | 104 |
| Table 8-1: Examples of the proposed aspects needed for internal and external monitoring and evaluation activities | 125 |
| Table 9-1 Roles and responsibilities of the entities responsible for RAP implementation (NAT) | 128 |
| Table 9-2 Roles and responsibilities of the entities responsible for RAP implementation (Governmental organizations) | 130 |
| Table 9-3: Proposed Capacity Building Activities | 133 |
| Table 9-4 RAP -Related Activities Schedule | 135 |

LIST OF ACRONYMS

| Acronym | Definition |
|---------|---|
| AD | Agricultural Directorate |
| AFD | Agence Française de Développement (French Development Agency) |
| APTA | Alexandria Public Transportation Authority |
| CC | Compensation Committee |
| CGM | Community Grievance Mechanism |
| CLC | Community Liaison Committee |
| CLO | Community liaison Officer |
| EEAA | Egyptian Environmental Affairs Agency |
| EIB | European Investment Bank |
| ESA | The Egyptian General Authority for Land Survey |
| ESGA | Environmental and Social General Manager |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| ESS | Environmental and Social Standards |
| FGDs | Focus Group Discussion |
| HS | Housing Surveys |
| KII | Key Informant Interviews |
| LS | Department of Land Surveying |
| MoT | Ministry of Transport |
| NAT | National Authority of Tunnels |
| NGOs | Non-Governmental Organizations |
| PAPs | Project Affected Persons |
| RAP | Resettlement Action Plan |
| RAP | Resettlement Action Plan |
| RED | Real Estate Department |
| RET | Real Estate Taxes |
| RPF | Resettlement Policy Framework |
| SC | Steering Committee |
| WB | World Bank |

GLOSSARY AND DEFINITIONS

| Terminology | Explanation |
|---|---|
| Census | Household and business survey that covers all Project Affected Persons irrespective of entitlement or ownership. It provides a complete inventory of all project affected persons and their assets. It can be used to minimize fraudulent claims made by people who move into the area affected by the project in the hope of being compensated and/or resettled |
| Compensation | Refers primarily to the cost of payment for expropriated land (including trees and crops that cannot be harvested), housing, structures, and other fixed assets, including assets acquired for temporary project use. It includes the costs incurred to help directly acquire substitute properties as well as the cost of acquiring resettlement sites. |
| Cut-off Date | The date of the census which is set to determine the affected population and their eligibility. |
| Entitlements | A range of measures comprising compensation, income restoration, transfer assistance, income substitution, and relocation which are due to affected persons, depending on the nature of their losses, to restore their economic and social base. |
| Environmental and Social Impact Assessment (ESIA): | The process of identifying, predicting, evaluating a project's positive and negative environmental and social impacts on the biophysical and human environment as well as identifying ways of avoiding, minimizing, mitigating and compensating, including offsetting in the case of the environment and remedying in the case of social impacts, by applying the mitigation hierarchy. This process includes consultation with direct and indirect stakeholders and the elaboration of an environmental and social management plan detailing the implementation of the mitigation measures. |
| Full replacement cost | The value determined to be fair compensation for: (i) land, based on its productive potential; (ii) houses and structures, based on the current market price of building materials and labor without depreciation or deductions for salvaged building material, and (iii) residential land, crops, trees, and other commodities, based on their market value. Such cost needs to further account for any removal costs, utility connection costs, taxation costs imposed on new housing/re-established businesses, including any administrative charges, title fees, or other legal transaction costs, etc. |

| Terminology | Explanation |
|--|---|
| Grievance and Redress Mechanism | <p>Represents the system adopted by the promoter that enables all stakeholders, in particular impacted individuals and communities, to provide feedback, voice their concerns and, thereby access information and, where relevant, seek recourse and remedy.</p> <p>Such mechanism must be effective, by way of being verifiably legitimate; accessible; predictable; equitable; transparent; compatible with human rights; based on engagement and dialogue; and, a source of learning for all stakeholders involved, including the promoter. The scope of such a mechanism concerns the entire operation, yet it is not intended to serve employer-workforce relations, as a separate grievance structure is exclusively dedicated to this purpose.</p> |
| Involuntary Resettlement (IR): | Physical displacement (i.e. physical relocation of residence or loss of shelter), and/or economic displacement (i.e. loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition or restriction of access to natural resources. |
| Monitoring | The process of repeated observations and measurements of environmental and social quality parameters to assess and enable changes over a period of time |
| Project Affected Persons (PAPs) | <p>Refers to all persons impacted by the involuntary resettlement, including: all members of a household (women, men, girls, boys; several generations in the case of extended households).</p> <p>PAPs might be the households, firms, private institutions ethnic minority group; tenants of lands; land owners and sharecroppers; informal settlers regardless to their legality; holders of customary land-rights; informal business-operators and their employees/assistants .who, on account of changes that result from the project will have their (i) standard of living adversely affected, (ii) right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently or temporarily; and/or (iii) business, occupation, place of work or residence, or habitat adversely affected, with or without displacement.</p> <p>Eligible PAPs may be in any of the following situations: (i) have formal legal rights to the land/structure they occupy; (ii) do not have formal legal rights to land, but have a claim to land that is under the national laws (e.g. ancestral, traditional lands); (iii) are dependent on the impacted land for their livelihood by way of customary access to natural resources; (iv) have no legal right or claim to the land or structure they occupy; and/or (v) economically displaced persons who face loss of assets or access to assets.</p> |

| Terminology | Explanation |
|---------------------------------------|---|
| Public consultation: | Where communities are, or are likely to be, affected by adverse impacts from a project, the promoter will undertake a process of meaningful consultation in a manner that provides the affected parties with opportunities to identify and express their views on project risks, impacts, and mitigation measures, and engage in a collaborative process with the project in responding to, and addressing considerations raised. |
| Resettlement Action Plan (RAP) | The document, in which the promoter of a project or other responsible competent authority describes the impacts of the involuntary resettlement, specifies the procedures that will be followed to identify, evaluate and compensate the impacts and defines the actions to be undertaken during all phases of the resettlement. |
| Stakeholders | Those who have an interest in project development and who will be involved in the consultative process, and includes any individual or group affected by, or that believes it is affected by the project; and any individual or group that can plan a significant role in shaping or affecting the project, either positively or negatively, including the host community/population. |
| Vulnerable Groups | Population groups which might suffer disproportionately from adverse resettlement impacts, such as, the old, the young, the handicapped, the poor, isolated groups and single parents. |
| Workers | They are all labor force operating the affected assets. They are classified into three categories: <ul style="list-style-type: none"> 1- Permanent workers who have formal contract or have employment commitment to work on permanent basis. Some of them might be working for more than 10 years without having an official contract. 2- Casual workers are the daily wage workers who have no contracts or no long-term commitment to work in the shops 3- Seasonal workers/ part time workers are those who might work for specific number of days, hours or seasons. The seasonal workers are recruited during summer season. |

requirement that any involuntary land acquisition related impacts of the Project on local populations must be compensated or mitigated.

- The Project may induce land acquisition and livelihood impacts. In this regard, EIB and AFD enforce that the Project should; avoid or at least minimise project-induced resettlement whenever feasible.
- Information for the RAP was collected through both primary and secondary sources.

3. Potential Negative Impacts Pertaining to Involuntary Land Acquisition and Livelihood Deterioration

Based on the final data shared by APTA in August 2021 about the tenants of shops, kiosks and other structure locates at the stations, after excluding the closed shops, the shops out of the right of way, and the shops used by APTA, following is a summary of the affected assets:

Table 0-1: Project Affected Assets, Lands and People

| Affected land | Total area of affected land | Duration | Owners of land | Current use of land |
|---|--------------------------------------|-----------|---|--|
| Lands | | | | |
| 1. A plot of land to be used to construct an electricity station | One plot of land 205-meter square | Permanant | Alexandria Governorate Authority | The land is used as a small garden cultivated with trees. The garden is not used by anyone as it surrounded by fence. No one will be affected due to the land acquisition there. |
| 2. The land allocated for the Raml Tram route from Raml to Victoria station and the depot | 208,210 meter square | Permanant | Alexandria Governorate Authority and APTA | The land is used by the current Tram and the depot. Many commercial and two service facilities are reported on the route (91 shops/mosque/toilet) |
| 3. Right of Way | No land required | *NA | NA | NA |

| Affected land | Total area of affected land | Duration | Owners of land | Current use of land |
|--|---|----------|----------------|---------------------|
| 4. Construction camp | No land required to date. Decision of land that will be used is mainly the contractor's decision. | NA | NA | NA |
| 5. Infrastructure (electrical lines and telecommunication) | No land required | NA | NA | NA |

* NA = Not applicable

| Affected assets | Total number of affected assets | Duration | Owners of assets | Current use of assets |
|--|-------------------------------------|-----------|---|---|
| Assets | | | | |
| Shops/kiosks/ shop used as open garden/toilet used by men/ mosque established instead of shops | 117 (only 91 of them are operating) | Permanent | APTA (owner of the shops) | The affected shops are used for commercial activities. The mosque is used for praying purposes. |
| An informal small mosque established at the station | 1 | Permanent | Private illegal structure that is not owned by anyone . The mosque was constructed by collecting donations from the community people. No one claimed the ownership of the mosque. | The mosque is used for praying. |

| Num | Affected group | Total number of affected groups | Comments |
|--|--|-----------------------------------|--|
| Project affected people | | | |
| I. Tenants of shops and Kiosks in stations owned by APTA | I1- Tenants of shop/Kiosk with contract ending before June 2022 ¹ | 12 | The owners of assets and lands are APTA and Alexandria Governorate that will lose access to income source permanently. |
| | I2- Tenants of Shops/ kiosks with valid contract after June 2022 | 43 | |
| | I.3: Tenants of APTA shop/Kiosk with contracts that ended before 2014 but continued to pay low rents | 20 | |
| | I.4: Tenants with contracts ended from 2015 to 2021 | 16 | |
| | I.5 : Sub-tenants | 2 | |
| | Sub-Total | 91 tenants + 2 sub-tenants | |
| II. Individuals engaged in labour in stations shops | II.1: Individuals with formal permanent contract with governmental enterprises (e.g. United Republic Newspaper Distribution Company, El Akhbar Foundation Dar Al Hilal Foundation) | TBD after the census | The casual workers are those who work on daily basis at cafés and restaurants. |
| | II.2: Individuals with formal permanent contract with the shops' tenants | TBD after the census | |
| | II.3: Individuals with informal contracts with shop tenants | TBD after the census | |
| | II.4 Individuals engaged in casual work (e.g. waiters in restaurants and cafés) | TBD after the census | |
| | II.5 Workers of the tram who are working in the | 200 | |

¹ These two categories have been defined because NAT suggested that those whose contract would expire before start of construction should not be entitled to compensation. Since the standard practice is for tenants whose contracts expire to continue paying rent until the new tenant is identified it was considered appropriate to include these tenants as eligible for compensation regardless of contract expire date.

| Num | Affected group | Total number of affected groups | Comments |
|---|---|--|--|
| Project affected people | | | |
| | Raml Tram now and are permanently recruited by APTA (governmental entity) ² | | |
| | II.6 Workers of the mosque (Gafaar Ibn Aby Taleb NGO) | 4 full time + 1 part time were recruited by the NGO ³ and one Imam was recruited by the Ministry of Endowment | |
| | Sub-Total | Estimated 148 workers in the shops and mosque / APTA workers is 200 | Labourers (tentative number to be updated 3 months before displacement) |
| III. Informal mobile and semi-mobile street vendors along the RoW and near stations | III 1: Semi-mobile Vendors who have a stable hand cart/ table/ stalls along the RoW and near stations | No estimates available (10 business around stations) | During various site visits, the number of vendors was not the same as the vendors did not have fixed site. Estimated numbers do not include PAPs found along the RoW. These numbers will be updated closer to the construction start date. |
| | III 2: Mobile Vendors who have no fixed workplace | Estimated 20-30 | |
| | III 3: Mobile Vendors who work inside the tram wagons | Estimated 15-25 | |
| | Sub-Total | No up to date estimates available | These numbers will be updated closer to the construction start date. |
| IV. Street Children | IV 1: Street children with no alternative accommodation arrangement | To be defined during the census | Number of street children was not the same in each site visit. |
| | IV 2: Street children who have shelters or families | To be defined during the census | |
| | IV 3: Street children engaged in illegal business (e.g. drug dealing) | To be defined during the census | |

² These are governmental staff recruited by APTA on permanent based contract.

³ The NGO is not operating inside the mosque as the headquarter of the NGO is located in Bakous neighbourhood

| Num | Affected group | Total number of affected groups | Comments |
|--|---|---|---|
| Project affected people | | | |
| | Sub-Total | 10 children (estimated based on field observation) | |
| V. Homeless and beggars | V 1: Homeless people with mental disability | To be defined during the census | Homeless number changed 4 times based on the date of site visit. |
| | V 2: Homeless people who have no accommodation | To be defined during the census | |
| | V 3: Homeless people who work as beggars and have alternative accommodation | To be defined during the census | |
| | Sub-Total | 8 people (estimated based on field observation) | |
| VI. Tenants of Shops and Kiosks owned by APTA (same as Cat. I) and who have planted trees ⁴ | VI.1 Garden Shop tenant who planted decoration trees (in the garden or in the vicinity of shop) | 1⁵ | One shop tenant leased a shop and used it to plant trees and make it an open area |
| VII. Religious Structures | VII.1 Mosques | 2 | One big mosque is being operated by an NGO. Another very small mosque was built on the station by community people. |
| | Sub-Total | 3 | |
| VIII. Users of mosques, shops, transportation services, and garden | VIII.1 Users of the mosques | No estimates available | Users of the mosques will be slightly affected by the absence of the mosque as there are many alternative mosques within the area of influence. |

⁴ It has been decided to present the loss of the garden as a separate category of losses but these are tenants that have been recorded under Category I above.

⁵ Already accounted for under Category I.

| Num | Affected group | Total number of affected groups | Comments |
|---|---|---|--|
| Project affected people | | | |
| | VIII.2 Buyers and clients of the shops | No estimates available | Buyers and clients of the shops they will be slightly affected as the area of influence has thousands of shops of the same nature. |
| | VIII.4 Users of public transportation (e.g. tram, metro, minibuses, buses, taxis) | No estimates available | They will be slightly affected as alternative transportation means are available within the area of influence. |
| IX Shops and businesses along the RoW and near stations that will lose total access to their shops or experience partial loss of access and reduced customer traffic ⁶ | IX.1 : The shop' owners or tenants that might potentially be affected due to total loss of access to their shops resulting in closure of business | No estimates available (NAT has committed not to implement any road closures and restrictions) | If impact occurs, they will be severely affected due to the closure of access roads to their shops and may have to shut-down their operations. |
| | IX.2 The shop' owners or tenants along the RoW and near stations who might potentially be affected due to partial loss of access and reduced customer traffic | No estimates available (NAT has committed not to implement any road closures and restrictions) | If impact occurs, they will be affected temporarily due to reduced access to their shops and resulting income losses. |
| | IX. 3: The shop' employees who might be affected due to the total loss of access to their shops where they work. | No estimates available | If impact occurs, they will be affected and may lose their jobs temporarily. |
| X. Transport Operators | X.I Tuk tuk drivers/ co-drivers | No estimates available | No adverse impacts on their livelihood are anticipated. |
| | X.II Microbus drivers / co drivers | | |
| | X.III Bus drivers and conductors | | |

4. Legislative and Regulatory Framework

⁶ NAT has confirmed that no full loss of access to shops and business is contemplated. The assumption is that unless it is totally unavoidable there is a commitment to ensure access to shops and business at all times.

a. National Legislations

The Government of Egypt has a policy to pay compensation or offer assistance to people whose lands and properties are affected by projects undertaken by the Government. The most relevant Egyptian laws that regulate these issues include:

- The Egyptian Constitution (2014);
- Law 10 of 1990 for the Expropriation of Ownership for Public Interest; amended by Law number 1 of year 2015 and Law number 24 of year 2018 and Law 187 of year 2020.
- Egyptian Civil Code;

b. International legislations

- Applicable EIB, WB and AFD Polices and Standards
 - EIB Environmental and Social Standards (October 2018)
 1. Standard 6 pertaining to Involuntary Land Acquisition
 2. Stakeholder Engagement Standard 10
- AFD applicable legislations Pertaining to Involuntary Resettlement and World Bank ESS 5 and 10

5. Eligibility Criteria and Entitlement

- The basis of eligibility criteria is the cut-off date. The cut-off date will not be identified and disclosed unless the Public Interest Decree is issued and the final census is developed. Moreover, the final census can be implemented only by the compensation committee after the disclosure of the Decree. Accordingly, the official cut-off date cannot be presented in the resettlement policy framework.
- The cut-off date of workers will be disclosed after completing the census of workers at least three months before implementing the RAP.

Table 0-2: Summary of Eligibility Criteria and Entitlement

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-------------------------------------|--|---|------------------|---|---|
| | Primary Category | Secondary Category | | | |
| Loss of rental business (permanent) | I. Tenants of Shops and Kiosks in stations owned by APTA | I.1: Tenant of shop/Kiosk with contract ending before June 2022 ⁷ I.2 Tenant of Shops/ kiosks | (12) (43) | No specific entitlement according to Egyptian Laws | Cash compensation <ul style="list-style-type: none"> • Cash compensation at full replacement cost (RC) for lost income including:⁸ <ul style="list-style-type: none"> ○ All tenants except for those who have their contract terminated before 2014 and pay tenancy fees more than 500 EGP per month (more than 32 US\$) will receive 3- |

⁷ These two categories have been defined because NAT suggested that those whose contract would expire before start of construction should not be entitled to compensation. Since the standard practice is for tenants whose contracts expire to continue paying rent until the new tenant is identified it was considered appropriate to include these tenants as eligible for compensation regardless of contact expire date.

⁸ If Compensation Committee (CC) compensation falls below RC (Replacement Cost), NAT will inform the committee about the requirement of funding agencies before starting the compensation activities. This will take place before the committee valuate assets. NAT will issue an approval from the Chairman of the CC to valuate the compensation according to the full replacement cost to be presented in the RAP based on the approval or decree that will be received from his Excellency the Minister of Transport. The approval/ decree will include an annex that provides guidance about the entitlement and methodology of compensation valuation including market rates to be applied. Additionally, NAT representative within the CC will attend all the meetings that will be carried by the CC. His attendance and participation in guiding the committee to achieve full replacement will guarantee the commitment of the CC to apply what was presented in the RAP.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | with valid contract after June 2022 I.3: Tenant of APTA shop/Kiosk with contracts that ended before 2014 but continued to pay low rents | (20) | | month lease equivalent to market value of rental for shops of similar characteristics or better in the same neighbourhood/ street/sub-district based on the valuation carried out by the Compensation Committee (CC). ⁹ The valuation will be based on the rental lease valued predefined in the RPF (Refer to section 6.6). ¹⁰ The tenants whose contract was terminated before 2014 and pay low |

⁹ The CC will be formulated based on a decree from the governor or the Minister of Transport. The CC will be composed of representative of General Authority of Government Services (GAGS), and a representative of Agricultural Directorate (AD), the Directorate of Housing and Utilities (DHU) and the Directorate of Real Estate Taxes (RET) in the governorate level. Department of Land Surveying (LS) in Alexandria Governorate, Housing Surveys (HS) inside Governorate Authority, and APTA. In addition to representative of the owner (**NAT and MOT**) and the PAPs who will be selected by affected people to speak on their behalf. In the RAP, the nominated PAPs will be identified and reasons for selection will be presented. The selection of PAPs will be based on: 1) those who are interested to participate in the committee will inform the Community liaison officer of NAT, 2) a list of nominees will be shared with the PAPs. 3) They will select between 3-5 peoples. 4) The CC will be informed about the selected people. Moreover, the district authorities and other units might attend.

¹⁰ NAT and the Ministry of Transport play a major role in the compensation process by issuing Public Interest Decree and provision of compensation in line with the international standards. In order to overcome the challenge of ensuring that the CC will define compensation and entitlements in alignment with EIB/AFD standards, NAT will submit a memo to his Excellency the Minister of Transport in order to approve on all elements of compensation requirements. Upon his approval, the CC will adhere to all compensation requirements.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | I.4: Tenants with contracts ended from 2015 to 2021 | (16) | | <p>renting fees (below 500 EGP about 32US\$) are entitled for (3) month lease equivalent to market value as mentioned above.</p> <ul style="list-style-type: none"> ○ As the tenants with valid contract until December 2013 pay a relatively low renting value (less than 500 EGP), they will be in need for longer period to restore their income. It is essential to consider that the lease fees of the alternative shops might be more expensive than the current leased shops. ○ 3 months of the net revenue value (excluding all expenses e.g. water fees, workers' salaries, electricity cost). The calculation of the revenue will be done by the Compensation Committee based on real evaluation of similar shop activity following methodology as reported in the RPF (refer to Section 6.1).¹¹ |

¹¹ The tax register will not be credible or reliable to evaluate the revenue. The RPF will provide information about the revenue of similar shops as reported by the PAPs themselves during consultation activities carried in October -November 2021. This might be an acceptable reference. A full list of revenue of similar activity was prepared based on the consultation with the PAPs (see Annex 17) 59 of the PAPs shared this information.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> ○ The alternative shops should be in the same conditions or better than the current shops as stipulated by EIB/AFD requirements. ○ For the items and objects that cannot be relocated, cash compensation for the affected asset will be provided. The cash compensation should be the value of similar items or objects. ○ Provision of the painting cost of the replacement shop.¹² ○ Cash allowance to cover legal costs.¹³ ○ In case that the tenants take on workers NAT will pay salaries for a period of 3 months (Please see more details about this in the entitlement of workers below). ○ NAT will disburse the tenancy fees of the new shops, painting cost and the revenue 3 months prior to evacuation. This will enable the PAPs to lease the shop and |

¹² NAT in full cooperation with the CC define five categories of compensation for painting. This will be based on the current area of the affected shop.

¹³ cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.)

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>start operation even prior to the evacuation. NAT has already allocated 50 million EGP according to the Public Interest Decree to be used for compensation.</p> <p>In kind support</p> <ul style="list-style-type: none"> Support to shop tenants with transportation of materials and goods to the alternative shop.¹⁴ <p><u>Vulnerability assistance</u></p> <ul style="list-style-type: none"> Shops and kiosks that have monthly revenue less than 2,500 EGP will receive additional support by providing them ,in full cooperation with the Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA), with capacity building to operate a shop and micro-projects. A Memorandum of Understanding will be signed between NAT and MSMEDA to provide training sessions to the PAPs. <p>Engagement Actions</p> |

¹⁴ NAT will contract a firm to properly transport all goods. The contract with the firm will include an item about the liability of this firm on any damage to occur to the goods during transportation process.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> • The tenants were informed about the project and its impacts on their livelihood (Reference to the Stakeholder Engagement Plan and the consultation activities reported on in the RPF). This activity has been completed by the Project surveying team during the preparation of the RPF in October – December 2021. • Tenants will be oriented by NAT Community liaison officer about how to rationally select an alternative shop that they will afford paying the tenancy fees for after the transitional period. • Robust stakeholder engagement activities will be applied so as to inform them about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation. • Immediately after issuing the Public Interest Decree The tenant will be informed about the exact time of evacuation in order to be able to move his/her belongings without damaging them. The exact time will be shared with the tenants at least one month prior to evacuation. |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------------|---|--|---|--|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> The engagement program highlighted in the SEP will be implemented. |
| | | I.5 : Sub-tenants | (2) | No specific entitlement according to Egyptian Laws. Additionally, they are considered as informal occupants who are entitled for no compensation | They are considered as tenants; accordingly, they are entitled for the same remedial actions mentioned above in (group I.1 & I.2). |
| Loss of employment | II. Individuals engaged in labour in stations shops | II.1: Individuals with formal permanent contract with governmental enterprises e.g. Dar El Helal | 8 persons (based on self-reported information by the workers) | They are entitled to receive two months compensation as per labour law No. 12 of 2003 | <p>The enterprises will be informed about the project in order to relocate the employees/workers in other branches of the enterprise. Alternatively, if his/her contracts are terminated the following will be provided:</p> <p>Cash Compensation</p> <ul style="list-style-type: none"> 3 months' salary based on payroll records. Payment will be based on approval from the tenant of the shop on monthly basis. Accordingly, the workers will not leave the business. Their payment will be given by |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | publishing enterprise. ¹⁵ | | | <p>compensation committee on monthly basis to the shop tenants who will be required to provide a proof of receipt to CC signed by the worker and including date, amount, and mode of payment.¹⁶</p> <p>In kind support</p> <ul style="list-style-type: none"> • They will also be informed about employment websites and the contact information about these websites, e.g. cell phone/ phone numbers/ address and available jobs that match their qualifications (Annex 14 Employment Websites in Egypt). • Capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA). The types of capacity building will be about micro project feasibility studies, marketing, readymade garments, and other professions. A Memorandum of Understanding will be signed |

¹⁵ The specifics of contractual status of these employees will be assessed further at the time of the census.

¹⁶ NAT is responsible for the payment of all compensations but the entity responsible for disbursing the compensation to the PAPs is the committee.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--|---|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>between NAT and the two entities (MSMEDA and Ministry of Industry) to provide support and capacity building to workers. A list of available capacity building programs and modules will be shared with the PAPs and will be presented in the RAP.</p> <p>Engagement Activities</p> <ul style="list-style-type: none"> The workers will be informed about the project and its impacts on their income. The enterprises will be informed about the project in order to relocate the employees/workers in other branches of the enterprise. |
| | | II.2: Individuals with formal permanent contract with the shops' tenants | 10-15 people (estimate based on self-reported information during consultations with shop tenants) | They entitled to receive two months compensation as per labour law No. 12 of 2003 | <p>In case that the affected worker will continue working on the same business the following will be adhered:</p> <p>Cash compensation</p> <ul style="list-style-type: none"> Given the fact that the tenant have no income during transitional period and if the shop tenant will lease an alternative shop and he is willing to move workers to, the worker will be provided with 3-month salary to be paid directly by the |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>compensation committee or the governorate authority.¹⁷</p> <p>However, if the worker has their contract terminated or decides not to continue working in the same business the following will be adhered to¹⁸:</p> <p>Cash Compensation</p> <ul style="list-style-type: none"> • 3-month salary based on payroll.¹⁹ • Workers will obtain an official termination letter from the tenant in order to get the full compensation at least one month prior to eviction. • The workers will be informed about the exact time of evacuation at least three months before in order to be able to find an alternative job. All workers will be informed about the exact time |

¹⁷ The CC in cooperation with NAT will provide the salary to tenants on monthly basis and will follow up with the tenant to make sure that the salary was duly paid to the workers through provision of a signed receipt by the worker as proof including date of payment and amount. The monthly salary will be based on an evidence to be provided by the tenant e.g. pay slip. In case of having no evidence, the CC will estimate the salary based on average salary of the officially contracted people with the same position.

¹⁸ Under consideration by ECS whether payments for workers that will resign might be an incentive for people leaving their jobs in exchange of some cash advancement.,

¹⁹ As per footnote 30, the worker will receive the payment through the tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>by the RAP Consultant. After issuing the Public Interest decree at least 3 months before eviction.</p> <ul style="list-style-type: none"> They will receive 3- month salary based on a signed receipt from the tenant. <p>In kind measures</p> <ul style="list-style-type: none"> Provide them with capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA) if they request for. As mentioned above, both entities provide a wide range of capacity building programs, e.g. feasibility studies, marketing, readymade garments, and other professions. A list of all available trainings will be prepared and annexed to the RAP. In addition, the list will be shared with the affected workers during RAP preparation after the census. <p>Engagement activities (all workers)</p> <ul style="list-style-type: none"> Robust stakeholder engagement activities will be applied to inform workers about their entitlement, grievance mechanism, |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---------------------------------|---|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>compensation procedures, the time schedule and required legal documents needed to disburse their compensation.</p> <ul style="list-style-type: none"> The workers will be informed about the exact time of evacuation immediately after issuing the Public Interest Decree by the RAP consultant in order to be able to make an informed decision and find an alternative job in case they decide to terminate their current contractual arrangements. All workers will be informed about the project and its impacts on their income. All will be informed about employment websites and available jobs that match with their qualifications. The Project surveying team prepared a list of recruiting firms in Alexandria (see Annex 14). |
| | | II.3: Individuals with informal | 20-25 workers (estimate based on self-reported information) | No entitlement according to the Egyptian law | <p>For workers that will continue working in the same business, the following will be adhered to:</p> <p>Cash compensation</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|---------------------------------------|---|--|
| | Primary Category | Secondary Category | | | |
| | | contracts with shop tenants ²⁰ | during consultation with the tenants) | | <ul style="list-style-type: none"> If the shop tenant will lease an alternative shop and they are willing to relocate workers, the worker will be provided with 3-month salary to be paid directly by NAT to the shop tenants who will then be responsible for forwarding the compensation to the workers. Shop tenants will be required to submit a proof of payment to NAT signed by the workers acknowledging receipt of the payment, and including date, amount, and mode of payment.²¹ <p>However, if the worker has their contract terminated, the following will be adhered to:</p> <p>Cash Compensation</p> <ul style="list-style-type: none"> 3-month salary based on payroll or receipts. Compensation will be paid to the shop tenant who will then forward the amount to the workers as described above. |

²⁰ Under consideration if the project will have to ensure that all workers have a formal contract to allow compensation to be paid. ECS to confirm through engagement with NAT.

²¹ The CC in cooperation with NAT will provide the salary to workers on monthly basis after receiving an approval from the tenant. The monthly salary will be based on an evidence to be provided by the tenant e.g. pay slip. In case of having no evidence, the CC will estimate the salary based on average salary of the officially contracted people with the same position.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> Workers will obtain an official termination letter from the tenant in order to get the full compensation prior to relocation of business. The workers will be informed about the exact time of evacuation immediately after issuing the Public Interest Decree by the RAP consultant in order to be able to find an alternative job. The information will be shared 3-months before eviction. They will receive 3- month salary based on a signed receipt from the tenant. <p>In kind measures</p> <ul style="list-style-type: none"> Capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA) if they request for. The types of capacity building will be about micro project feasibility studies, marketing, readymade garments, and other professions. A Memorandum of Understanding will be signed between NAT and the two entities to provide support and capacity building to workers. A list of available capacity building programs and modules will be shared |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>with the PAPs and will be presented in the RAP.</p> <p>Engagement activities (all workers)</p> <ul style="list-style-type: none"> • Robust stakeholder engagement activities will be applied to inform workers about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation. • The workers will be informed about the exact time of evacuation at least three months before relocation of current business in order to be able to make an informed decision and find an alternative job in case they decide to terminate their current contractual arrangements. • All workers will be informed about the project and its impacts on their income. • All will be informed about employment websites and available jobs that match with their qualifications. The Project surveying team prepared a list of recruiting firms in Alexandria (see Annex 14). |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|----------------------|---|---|
| | Primary Category | Secondary Category | | | |
| | | II.4 Individuals engaged in casual work e.g. waiters in cafés and restaurants | TBD after the census | No entitlement according to the Egyptian law | They will receive the same entitlement of group II.3. |
| | | II.5 Workers of the tram who are working in the Raml Tram now and are permanently recruited by APTA | 200 | No entitlement according to the Egyptian law as they will not lose their jobs | <p>Cash compensation</p> <ul style="list-style-type: none"> No cash compensation will be provided. <p>Engagement activities</p> <ul style="list-style-type: none"> Workers will be informed about the project and its impacts. <p>Mitigation measures</p> <p><i>During construction:</i></p> <ul style="list-style-type: none"> APTA will be responsible for relocation of their workers. APTA will provide detailed process of relocation. APTA will share information with NAT about relocation of their workers. <p><i>During operation:</i></p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|---|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> Provide the drivers, workshop workers and conductors with capacity building to be able to work in the rehabilitated tram (if possible). <p>Alternatively</p> <ul style="list-style-type: none"> APTA will employ them as happened during construction phase. Any worker that reaches 60 years old will be excluded as they will receive their pension. |
| | | II.6 Workers of the mosque (Gafaar Ibn Aby Taleb NGO) | 4 full time+ 1 part time were recruited by the NGO 1 Imam recruited by the Ministry of Endowment | No entitlement according to the Egyptian law as they will not lose their jobs | <ul style="list-style-type: none"> The 4 workers will be entitled for same compensation and in-kind support as Cat. II.3 . The Imam will be reallocated by the Ministry of Endowment. Accordingly, he will not be entitled for cash compensation. |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--|---|---|--|---|---|
| | Primary Category | Secondary Category | | | |
| Loss of access to trading location (permanent and temporary) | III. Informal Mobile and semi/mobile street vendors along the RoW and near stations | III 1: Semi-mobile Vendors who have a stable hand cart/ table/ stalls in Victoria, Bakous stations, and along the RoW | Estimated 10 in the stations only. ²² | No specific entitlement according to the Egyptian law. On the contrary, they are considered as illegal occupants of streets and are chased by the police force. | <p>Although some of the vendors located at the stations may benefit to some extent from the presence of workers, it is expected that most vendors along the RoW and those occupying the side streets outside the fenced areas will need to relocate to alternative trading locations during the construction phase which might result in disturbance and loss of income. The vendors should will be able to continue working and earning income. Based on similar projects that have been implemented by NAT street vendors benefit a lot from the project as they can stand beside the construction metal fence during construction phase.</p> <p>Engagement activities</p> <ul style="list-style-type: none"> No specific entitlement. However, robust stakeholder engagement programme with informal street vendors to explain construction activities, schedules and grievance mechanism will be implemented. Stakeholder engagement and feedback will also serve as basis to identify appropriate measures and integrate them in |

²² Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>the Construction Disturbance Management Plans that will be developed by the contractors in charge of construction of the tram to avoid or minimise socio-economic impacts on street vendors.</p> <ul style="list-style-type: none"> • NAT/contractor in close coordination with the Alexandria municipal authorities also will show or direct the vendors to alternative trading locations including vacant spaces and areas of safer conditions. • Robust monitoring to confirm welfare status. <p>In kind support</p> <ul style="list-style-type: none"> • Support from NAT/contractor in relocation as needed (some vendors may require support in moving tables and stalls and other equipment as applicable if these are kept at the location and not removed daily). |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|---|---|---|
| | Primary Category | Secondary Category | | | |
| | | III 2: Mobile Vendors who have no fixed workplace <i>(This category can be found at most of stations along the ROW)</i> | Estimated 20-30 in the stations only. ²³ | No specific entitlement according to the Egyptian law. However, they are considered as illegal occupants of streets and are chased by the police force. | <p>Engagement activities</p> <p>Given the fact that they will not be affected, and as per EIB standards, no specific cash-based entitlement will take place. However, robust stakeholder engagement programme with informal street vendors to explain construction activities, schedules and grievance mechanism will be implemented. Also robust monitoring to confirm welfare status.</p> <p>In kind support</p> <ul style="list-style-type: none"> Support with securing temporary access to new trading locations and/or enabling them to stay beside the construction fence that surrounds the construction sites. This venue will be supportive to vendors as police will not chase them. Additionally, NAT should sign a Memorandum of Understanding with the security department, the governorate authority, |

²³ Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|--------------------------------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>social solidarity directorate that enables vendors to work safely at the designated areas.</p> <p>Vulnerability assistance</p> <ul style="list-style-type: none"> Additional vulnerability assistance to individuals with large numbers of dependents in household (children, elderly, disabled) and/or those who are the primary providers for their households. The assistance can be secured by NGOs (Misr El Kheir- Caritas- Resalla...etc) who have similar supportive programs in Alexandria governorate. |
| | | III 3: Mobile Vendors who work inside the tram wagons | Estimated 15-25. ²⁴ | No specific entitlement according to the Egyptian law. However, they are considered as illegal occupants of | <p>Engagement activities</p> <p>No specific entitlement. However, robust stakeholder engagement programme with informal street vendors to explain construction activities, schedules and grievance</p> |

²⁴ Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW, as applicable.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-----------------------------|---------------------|---|---|--|---|
| | Primary Category | Secondary Category | | | |
| | | | | streets and are chased by the police force. | mechanism will be implemented. Also, robust monitoring to confirm welfare status. |
| Loss of access to a shelter | IV. Street children | IV 1: Street children with no alternative accommodation arrangement | The rough estimate of this category is 3-5 children | No specific entitlement according to the Egyptian law. However, they are classified as orphans that need shelters. | <p>NAT has two scenarios to follow:</p> <ol style="list-style-type: none"> 1- Either to accommodate them in a governmental shelter 2- Or accommodate them in a Shelter run by an NGO <p>In kind support</p> <ul style="list-style-type: none"> • NAT will sign a Memorandum of Understanding with the security department, the governorate authority, NGOs , Social Solidarity directorate and Health directorate. This Memorandum of Understanding aims to provide proper accommodation for street children. • Street children will be engaged with by the social solidarity directorate staff who work in “ Children and Homeless Without Shelter Program”. As the social solidarity team has |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>wide experience in dealing with street children. They will be the responsible entity in cooperation with NAT.</p> <ul style="list-style-type: none"> Street children will be accommodated in governmental shelters that are affiliated to the Ministry of Social Solidarity upon their free will (if they are above 12 years and can choose for themselves). The young street children below 12 years old will be sent to a shelter. Alternatively, they might be accommodated in the NGOs shelters. Provide them with capacity building programs or sending them back to schools, upon their free will, the capacity building will be on carpentry, how to start small business and food production. The health directorate will secure any medical check-up required in order to accommodate children in the shelters. <p>Engagement activities</p> <ul style="list-style-type: none"> For those who are unwilling to get into shelters, they will be informed about the project and the |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|--|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>necessity to stay outside the tram route by the social solidarity team .</p> <ul style="list-style-type: none"> They should also be informed of a CLO/contact person and the GRM established for the project so that they can come forward for needs and requests. |
| | | IV 2: Street children who have shelters or families | The rough estimate of this category is 2-5 children | No specific entitlement according to the Egyptian law. However, they are considered fugitives that need to be taken back to their families. | Social solidarity directorate will work with street children in order to convince them to reunite with their families. Alternatively, all above mentioned procedures including engagement activities (mentioned in group IV (1) will be applied. |
| | | IV 3: Street children engaged in illegal business (e.g. drug dealing) | To be defined during the census with the help of Social Solidarity | They are entitled to be supported and accommodated in Juvenile Justice as they are of | <p>In kind support</p> <ul style="list-style-type: none"> In full cooperation with the security staff, Juvenile unit, Social Solidarity directorate and NAT Community liaison officer they will be |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|--------------------------------|--|--|---|---|
| | Primary Category | Secondary Category | | | |
| | | | The rough estimate is 3-6 children | delinquency behaviour. | <p>engaged with prior to the project. They can be sent to Juvenile shelters (if possible).</p> <ul style="list-style-type: none"> In full cooperation with Social Solidarity directorate and Health directorate, the drug addicts might be sent to rehabilitation centres. <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project and the necessity to stay outside the tram route by the social solidarity team three months prior to construction activities. They should also be informed of a CLO/contact person and the GRM established for the project so that they can come forward for needs and requests. |
| | V. Homeless and street beggars | V 1: Homeless people with mental disability (this category was reported by | To be defined during the census with the help of Social Solidarity | No entitlement according to law | <p>In kind support</p> <ul style="list-style-type: none"> In full cooperation with Health Directorate, they will be directed to hospital. They will be tested by Health Directorate and based on the medical check-up report they will be sent to the psychiatric hospital in Cairo. They should be |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--|--|---|--|
| | Primary Category | Secondary Category | | | |
| | | the social solidarity team) | 1 person | | <p>allowed to express their consent to be sent to the hospital depending on the mental disability severity.</p> <p>Alternatively,</p> <ul style="list-style-type: none"> They will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be provided with blankets, food, water and medication by the initiative. <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project impacts and the necessity to evacuate the construction site. |
| | | V 2: Homeless people who have no accommodation | To be defined during the census with the help of Social Solidarity | No entitlement according to law | <p>In kind support</p> <ul style="list-style-type: none"> They will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|---------------------------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | 3-5 persons are estimated | | <p>provided with blankets, food, water and medication by the initiative.</p> <ul style="list-style-type: none"> A Memorandum of Understanding will be signed with NAT, Health Directorate and Security department to provide the homeless with required support. <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project impacts and the necessity to evacuate the construction site. Robust stakeholder engagement programme with them to explain construction activities, schedules and grievance mechanism will be implemented. <p>Vulnerability assistance</p> <ul style="list-style-type: none"> Additional vulnerability assistance can be provided in form of food, medication, etc by the project or by the NGOs e.g. Resala, Caritas, Misr El Kheir. |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|---------------|---|---|--------------------------|--|---|
| | Primary Category | Secondary Category | | | |
| | | V 3: Homeless people who work as beggars and have alternative accommodation | 5-8 people are estimated | No entitlement according to law. However, they violate the law by committing begging activities. | <p>In kind support</p> <ul style="list-style-type: none"> They will be enabled to stay outside the corridor of the Tram. <p>Engagement activities</p> <ul style="list-style-type: none"> In order to enable the street beggars to restore their income, a robust stakeholder engagement programme with informal street beggars to explain construction activities, schedules and grievance mechanism. |
| Loss of trees | VI. Tenants of Shops and Kiosks owned by APTA (same as Cat. I) and who have planted trees | VI. 1 Shop tenant who planted decoration trees (in the garden or in the vicinity of shop) | 1 | Entitled for monetary compensation | <p>Cash compensation</p> <ul style="list-style-type: none"> Monetary compensation to be provided to the owner of affected decoration trees based on the value determined by the Agriculture Directorate. <p>In kind support</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|----------------------------------|--------------------------|--------------------|--|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> The owner of the trees will be enabled to move the decoration trees (about 10 trees) |
| Loss of communal infrastructures | VII. Religious structure | VII. 1 Mosques | <p>1 small praying structure located on the pavement of Victoria station</p> <p>1 big mosque that is run by an NGO</p> | The Ministry of Endowment receives all compensation related to mosques. | <p>Cash compensation</p> <ul style="list-style-type: none"> NAT will disburse a compensation to the Ministry of Endowment. They Ministry is the sole entity responsible for defining the compensation value . The compensation to be defined by the Ministry of Endowment covers all costs. The Ministry will disburse the compensation to the NGO that operates the big mosque. It is noted that the NGO constructed the mosque. With regards to the small praying structure located on the pavement of Victoria station, the Ministry of Endowment can keep the compensation as there is no owner of the small praying structure located on the pavement of Victoria station. |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> NAT should follow up with the Ministry of Endowment to be sure that the NGO has received their compensation. The Ministry must share with NAT official documents and evidence that they disbursed the compensation to the NGO running the mosque. <p>In kind support</p> <ul style="list-style-type: none"> Given the fact that the NGO collects charity money from the surrounding areas of the mosque and the prayers, NAT will support the NGO by installing a banner informing the new location where community people can communicate with the NGO to collect the charity financial support. Those who work inside the mosque now will collect money from the surrounding communities. <p>Engagement activities</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--|--|--|--------------------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | A robust stakeholder engagement programme with the NGO will be applied. |
| Impact on Community people | VIII. Users of mosques, shops, transportation services and garden | VIII.1 Users of the mosques VIII.2 Buyers and clients of the shops VIII.3 Users of public transportation (e.g. tram, metro, minibuses, buses, taxis) | NA | No entitlement | <ul style="list-style-type: none"> No adverse impacts on their livelihood are anticipated therefore no compensation is defined. <p>Engagement activities</p> <ul style="list-style-type: none"> A robust stakeholder engagement programme with this category will be applied. Information will be shared about the project, its impacts, duration, alternative traffic routes and GRM |
| Temporary loss of income due to construction disturbance | IX. Shops and businesses along the RoW and near stations that will lose total access to their shops or | IX.1 : The shop' owners or tenants along the RoW and near stations that might potentially be affected due to the total loss of | Not determined yet | No entitlement. However, NAT has developed procedures to manage the impacts on this category before | <p>Cash compensation:</p> <p>NAT RAP Compensation Committee will calculate the compensation based on monthly revenue of similar activity within the same street or the monthly revenue of the affected shop prior to closure of the access including any salaries for affected workers. As well as cash or in kind support for covering legal costs for the</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|--|--|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | experience partial loss of access and reduced customer traffic ²⁵ | access to their shops resulting in closure of business ²⁶ | | | <p>reestablishment of the business in new location as applicable.²⁷</p> <p>Engagement activities</p> <ol style="list-style-type: none"> 1. A robust stakeholder engagement programme with the affected tenants/ owners and employees will be applied. 2. Prior to closure of any shop, the shop tenants/ owners will be informed about the closure of access to their shops, the compensation approach and the grievance channels. |

²⁵ NAT has confirmed that no full loss of access to shops and business is contemplated. The assumption is that unless it is totally unavoidable there is a commitment to ensure access to shops and business at all times.

²⁶ This is not to be confused with the shops and businesses experiencing reduced customer traffic due to reduced access to the shops (category IX.2). The approach for compensating these shops and businesses is described in Section 5.2. To be considered for compensation disturbance should be more than month interruptedly.

²⁷ cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.)

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|--------------------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>3. The tenants /owners of the shops will be allowed to install a poster informing whether they are operating or not.</p> <p>Vulnerability assistance</p> <ul style="list-style-type: none"> To be determined based on the affected shops, as no data available for the time being about the shops that will be affected. Transitional allowance or support during the interim period until access is re-established. Assistance in relocation of structures and right to salvage material. |
| | | IX.2 The shop' owners or tenants along the RoW and near stations who might potentially be | Not determined yet | No entitlement. However, NAT has developed ad hoc procedures based on national standards to | <i>Refer to Section 5.2</i> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--|--------------------|--|---|
| | Primary Category | Secondary Category | | | |
| | | affected due to partial loss of access and reduced customer traffic | | manage the impacts on this category before (see Section 5.2) | |
| | | IX. 3: The shop' employees who might be affected due to the total loss of the access to their shops where they work. | Not determined yet | No entitlement | <p>Cash compensation:</p> <ul style="list-style-type: none"> NAT will calculate the compensation for shop employees on their monthly salary. Employees will receive their compensation through the shop tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment. <p>Engagement activities</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-----------------------------------|------------------------|------------------------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <p>4. A robust stakeholder engagement programme with the affected tenants/ owners and employees will be applied.</p> <p>5. Prior to closure of any shop, the employees will be informed about the closure of access to their shops, the compensation mechanism and the grievance channels.</p> <p>Vulnerability assistance</p> |
| Loss of Transportation livelihood | X. Transport operators | X.I Tuk tuk drivers/ co-drivers | | | <ul style="list-style-type: none"> No adverse impacts on their livelihood are anticipated therefore no compensation is defined. <p>Engagement activities</p> <ul style="list-style-type: none"> A robust stakeholder engagement programme with this category will be applied. Information will be shared about the project, its impacts, duration, alternative traffic routes and GRM |
| | | X.II Microbus drivers / co drivers | | | |
| | | X.III Bus drivers and conductors | | | |



The Alexandria Raml Tram
Rehabilitation Project



| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | |

6. Institutional Arrangements

- Reference to Law 10 of year 1990 pertaining to land acquisition, a compensation committee must be established to manage compensation activities as per Article No 6 of Law 10. The committee is formed in each governorate by a decision of the governor, with a representative of the Land Survey Authority (if land acquisition is needed) as chairman, and the membership of a representative from each of the Directorate of Agriculture, the Directorate of Housing and Utilities, and the Directorate of Real Estate Taxes in the governorate in addition to a representative of the project affected people.
- The committee to be formulated under Tram Raml consists of:
 - Governorate Authority
 - Department of Real Estate (*Amlak*)
 - Department of Urban Planning in the Governorate
 - Department of Legal Affairs
 - Department of Social Affairs in the Governorate
 - Directorate of Housing and Infrastructure in the Governorate
 - The Ministry of Endowments
 - Districts/ local units
 - Representatives of PAPs
- The above-mentioned committee mandates are presented in section 2.3 and section 10.1 of this report
- The Real Estate Department located in NAT will be responsible for the implementation of the resettlement and economic restoration activities in full cooperation with Alexandria Governorate Authority.
- The Environmental and Social General Manager in NAT will be responsible for monitoring all activities pertaining to impacts related to resettlement.
- The person in charge for the Governmental Complaint Portal and the Committee to be established for grievance will work closely to manage any grievances related to livelihood impacts.

The above-mentioned groups require capacity building. Accordingly, four training courses are the core for the implementation of the RAP; they are as follows:

- EIB and WB policies related to resettlement activities. (including valuation- entitlement-eligibility- gaps between national and international requirements and strategies to bridge the gaps.
- Stakeholder engagement and consultation skills
- Skills of documentation: this module attempts to provide the entities with filing skills that will be needed for reporting and auditing missions of the funding agencies.
- Monitoring and evaluation: It is one of the most crucial trainings required to enhance the monitoring skills of NAT staff

7. Stakeholder Engagement Activities

The Consultant adopted a comprehensive stakeholder engagement activity from December 2020 to date and will continue until completing all RAP activities.

A data collection process was carried out in December 2020 to gain better understanding of the socioeconomic characteristics of all PAPs. Thereafter, additional consultation activities were carried out with the PAPs in October and November 2021 in order to discuss the modes of compensation. Additionally, an interview was carried out with Social Solidarity Directorate in October 2021 in order to better understand how homeless people and street children can be resettled.

The street vendors also were consulted in October and November 2021 to gain information about their living conditions and how they can restore their income. Additionally, microbus drivers and tuktuk drivers were reached out in October and November in order to collect information about how they will be affected.

The Consultant met with all tenants and a sample of workers as they are not permanent workers. The consultant met with APTA, NAT, NGOs, the Governor and various stakeholders.

8. Monitoring and Evaluation of RAP activities

Monitoring and Evaluation (M&E) are key components of the RPF and the RAP and have the following objectives:

- Monitoring of specific situations or difficulties arising from implementation and of the compliance of implementation with objectives and methods set out in the RAP;
- To verify that project activities have been effectively completed with respect to quantity, quality and timeliness;
- Evaluation of medium and long-term impacts of resettlement on affected households' livelihood, environment, local capacities and economic development.

NAT will prepare in full cooperation with the RAP consultant a monitoring matrix that must be applied during the implementation of the RAP and upon completion of all activities

9. Budget

The Project will ensure that compensation costs, as well as resettlement costs, are built into the overall project. All forms of compensation and resettlement assistance must be provided prior to displacement. In addition, all compensation and resettlement works must be concluded at least three months prior to actual commencement of any construction works. The total budget will be determined in the RAP.

1. INTRODUCTION

1.1 Preamble

This document constitutes the Resettlement Policy Framework (RPF) for the Raml Tram Project, Alexandria governorate, Egypt. This project is implemented by the National Authority of Tunnels.

This RPF was developed in December 2021. It documents the commitments, procedures, and actions to be taken in order to mitigate all impacts related to involuntary resettlement and economic displacement consistent with Egyptian laws and the European Investment Bank (EIB) and the French Development Agency (AFD) who are the funding agencies of Raml Tram Project. AFD adopts the World Bank Environmental and Social Standards²⁸.

In cases of involuntary land acquisition and economic displacement EIB standard 6 pertaining to involuntary land acquisition and the World Bank Social Standards 5 pertaining to land acquisition, restrictions on land use and involuntary resettlement are triggered. Additionally, standards 10 of stakeholder engagement requirements of the EIB and WB are also applicable to this project.

Based on an assessment of the available information and issued decrees and due to the absence of the final official census of all affected people, the EIB and AFD agreed to develop first an RPF. Upon developing the final census of all PAPs and issuing all required decrees the National Authority of Tunnels is committed to develop a Resettlement Action Plan is to manage the applied process pertaining to the involuntary land acquisition .

EcoConServ Environmental Solutions was contracted by Systra (NAT consultant) to develop a Livelihood Restoration Plan in October 2020. However, due to having a physical displacement a Resettlement Policy Framework and the Resettlement Action Plan were planned to be developed as per recommendation from EIB and AFD. This document is the RPF that was developed in December 2021.

²⁸ 2016. "World Bank Environmental and Social Framework." World Bank, Washington, DC.

1.2 Purpose and Objectives of the Resettlement Policy Framework Document

Alexandria Raml Tram Rehabilitation Project will be implemented on the current corridor used by the tram. Therefore, it is anticipated that all shops, assets and objects located within the tram stations will potentially be affected. Additionally, a plot of land (205 meter) will be needed to construct an electric substation. Consequently, a Resettlement Action Plan (RAP) or a Resettlement Policy Framework (RPF) has to be prepared in full compliance with the funding agencies' (EIB and AFD) requirements and standards. AFD applies World Bank ESSs (October 2017) for all high and substantial E&S risks projects, as is the case here. This RPF and the subsequent RAP shall refer more specifically to ESS 5 pertaining to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and ESS10 pertaining to Stakeholder Engagement and Information Disclosure.

Given the absence of final project affected people census data and the lack of compensation committee and grievance committee, both EIB and AFD agreed to develop an RPF. Upon receiving all pending data, a Resettlement Action Plan will be prepared. EcoConServ Environmental Solutions developed this RPF in full compliance with national and international regulations. It is worth mentioning that this RPF is detailed and more advanced than other RPFs developed for other projects. However, the official census was the main barrier to develop the RAP.

This RPF will be submitted to the National Authority for Tunnels (NAT) and their Lenders. Accordingly, NAT will be able to respond to the Environmental and Social Handbook, EIB Standard 6: "Involuntary Resettlement", Standard 7: "Rights and interests of vulnerable groups" and EIB Standard 10: "Stakeholder Engagement" (Version 9.0 of 02/12/2013); requirement that any involuntary land acquisition related impacts of the Project on local populations must be compensated or mitigated. Additionally, a memorandum will be prepared summarizing the required activities, compensation entitlements and the required budget to be shared with his excellency the Minister of Transport for his endorsement. This memo will be supportive to full implementation of the resettlement and economic displacement activities. The memo will be annexed to this RPF (Annex 23). The Public Interest Decree related to land acquisition was issued and published in December 2021. Accordingly, the compensation committee can be formulated and census activities can take place during the first quarter of 2022.

The Project will induce land acquisition and livelihood impacts. In this regard, the European Investment Bank (EIB) and the Agence Française de Développement (AFD) enforce that the Project should:

- Avoid or, at least minimise, project-induced resettlement whenever feasible by exploring alternative project designs;
- Avoid and/or prevent forced evictions and provide effective remedy to minimise their negative impacts should prevention fail;
- Ensure that any eviction which may be exceptionally required is carried out lawfully, respects the rights to life, dignity, liberty and security of those affected who must have access to an effective remedy against arbitrary evictions;
- Respect individuals', groups' and communities' right to an adequate standard of living, as well as other rights that may be impacted by resettlement;
- Respect right to property of all affected people and communities and mitigate any adverse impact arising from their loss of assets, or access to assets and/or restrictions of land use, whether temporary or permanent, direct or indirect, partial or in their totality. Assist all displaced person to improve, or at least restore, their former livelihoods and living standards and adequately compensate for incurred losses, regardless of the character of existing land tenure arrangements (including title holders and those without the title) or income-earning and subsistence strategies;
- Uphold the right to adequate housing, promoting security of tenure at resettlement sites;
- Ensure that resettlement measures are designed and implemented through the informed and meaningful consultation and participation of the project-affected people throughout the resettlement process; and,
- Give particular attention to vulnerable groups, including women and minorities, who may require special assistance and whose participation will be vigilantly promoted.

1.3 Methodology of the Resettlement Policy Framework

The RPF team was planning to develop a RAP. However, due to the absence of the official census survey covering all PAPs and the lack of the formation of committees, the EIB and AFD recommended to develop an RPF instead of a RAP. However, many of the typical

activities to complete a RAP have been developed. For example, disclosure, data collection, focus groups, interview etc were carried out. Upon completion of the census subsequent to this RPF, the study team will prepare the full RAP.

The RPF team adopted a participatory rapid appraisal methodology by collecting Information from primary and secondary sources. Desk-based research provided an initial base of information that was supplemented with Key Informant Interviews (KIIs) with key Project stakeholders in Alexandria and Cairo and at the Project site as well as Focus Group Discussions (FGD) with Project Affected Persons (PAPs) at site.

Desk-based research consisted of:

- Reviewing secondary data sources including technical and Project related documents;
- Reviewing primary documents including tenancy contracts presented by the Alexandria Passenger Transportation Authority APTA;
- Reviewing Egyptian laws related to land rights and land acquisition;
- Studying existing route and alignment of the Tram; and
- Spatial analysis using GIS data and acquired satellite imagery from 2020.

Field research was conducted by the Project surveying team from EcoConServ (study Consultant) with APTA in order to collect baseline data about the Project Affected People in December 2020 and October- December 2021. The surveying team was composed of female and male data collectors.

The following engagement and data collection activities have been undertaken:

- **Key Informant Interviews** were conducted in Alexandria Governorate on the 29th of December 2020 with representatives from:
 - Systra – Project Owner Consultant
 - APTA staff
 - Social Solidarity directorate
 - Caritas NGO
- **Structured questionnaires** were carried out with the following categories below (please see Annex 16 for the data collection tools) A summary of the questionnaire analysis is presented in the baseline section:

- The Project Affected People (tenants 91) in December 2020 October November and December 2021.
- The workers inside the shops (39) October and November 2021.
- The street vendors (8) October and November 2021.
- **Focus Group Discussions** were carried out with the following groups:
 - With NAT (project engineers- staff members in charge of environmental impacts – staff members responsible for compensation and grievance mechanism) in January 2021
- Field Observations were undertaken in November and December 2020 and October – November 2021 during:
 - Site visit – to all affected shops and assets in October and November 2021.

1.4 Project Description

The National Authority for Tunnels (Project owner) is the Government Agency operating under the jurisdiction of the Ministry of Transport. It was established in 1983 for implementing Metro Lines projects in the Arab Republic of Egypt. NAT is responsible for developing the relevant scientific and economic researches pertaining to the Metro Lines, in co-operation with foreign and local companies. Since its establishment, NAT has successfully implemented Metro Lines Networks (more than 83 KM).

The consortium, led by SYSTRA and comprising its partners Egis, ACE and Projacs, provides services on behalf of NAT for the preliminary design, preparation and evaluation of tender documents, and supervision of works until the end of the guarantee period.

The existing Raml Tram is a double tracks rail system running from Raml station to Victoria station (Nasr station). It currently operates as two distinct lines with common tracks on a large part of the line. Line 1 is 10.6 km long with 31 stops and line 2 is 10.1 km with 29 stops. The total infrastructure length is 14.4 km including both loops (Sidi Gaber and San Stefano).

The line goes through central areas of Alexandria; it serves the densest areas between the east and the city centre. The social level of the population served varies along the route from very poor to medium class. The line also serves major trip generators such as the University, the Sporting Club and two Abu Qir railway stations.

The project will use the **same exact route** designated for the existing tram. The construction area will be fenced using metal sheets. Below is a summary table of all required lands:

Table 1-1: Project Affected Assets, lands and people

| Affected land | Total area of affected land | Duration | Owners of land | Current use of land |
|---|---|-----------|---|---|
| 1. A plot of land to be used to construct an electricity substation | One plot of land 205-meter square | Permanent | Alexandria Governorate Authority | The land is used as a small garden cultivated with trees by Alexandria Governorate Authority. The garden is not used by anyone as it is surrounded by fence. No one will be affected due to the land acquisition there. |
| 2. The land allocated for the Raml Tram route from Raml to Victoria station and the depot | 208,210 meter square based on the land decree issued in December 2021 | Permanent | Alexandria Governorate Authority and APTA | The land is used by the current Tram and the depot. Many commercial and two service facilities are located inside the current stations (91 shops/mosque/toilet) |
| 3. Right of Way | No land required | *NA | NA | NA |
| 4. Construction camp | No land required to date. Decision of land that will be used is mainly the contractor's decision. In such case a land access procedure will be developed by the RAP consultant. | NA | NA | NA |
| 5. Infrastructure (electrical lines and telecommunication) | No land required | NA | NA | NA |

* NA = Not applicable

1.4.1 Project Justification:

The rehabilitation process of Raml Tram will include improvement of the current status and introducing some new operating systems. The following table shows the current status of the tram components and the enhancement of the same components that will be achieved after the implementation of the rehabilitation activities. Detailed description of the enhancement is comprehensively presented in the ESIA.

1.4.2 Construction Activities:

All work sites will be separated and confined by hoarding. Heavy equipment will include cranes, HGV trucks, excavators, concrete pumps and mixer trucks. In addition, for the viaducts piling equipment will be used and formwork / scaffolding erected to form the viaduct piers.



Figure 1-1: Hoarding

For the bridge sections the Contractor may choose specialist bridge erector / launching girder equipment, steel bridge sections or cast-in-situ concrete. The construction method may vary, depending on location of the viaduct.

Given the short construction period required by NAT, the Contractor will have to be active on several work-fronts at any one time. There is space at the depot area and Raml Tram station to provide construction bases for the Contractor. For the at-grade sections the Contractor will try and utilize the existing tramway corridor to transport equipment / materials with concrete delivery along the adjacent roadways. The existing tramway corridor varies in width along the alignment (8 – 14m approx.).

With regards to restrictions imbedded during construction activities, moveable Hoarding will be placed around construction areas to separate works from the public. There will inevitable be an impact on adjacent traffic and pedestrian movement. The Contractor may have to provide pedestrian access through the hoarding and across the construction sites.

Where road temporary road closures / diversions are required the Contractor must liaise with local authorities and the affected local community to minimize construction disturbance (see Employers Requirements documents). In places it may be necessary to place hoarding close to facades (San Stefano South Loop perhaps), and in such cases the Contractor must liaise with affected persons to minimize construction impacts. Permanent noise barriers are foreseen at critical locations.

Prior to any construction activities, the contractor will share with NAT all information about the required restrictions an impacts that might entail temporary disturbance to the surrounding business in order to measure the impacts on their livelihood and propose mitigation procedures as defined in the Employers Requirements – Project Management Section 11 and Mitigation Requirements.

1.4.3 Buffer Zone:

Based on discussions with Systra about the restrictions to be enforced and safety buffers to be established, they reported that no new buffer zone is applicable to the Raml Tram Project. Given the limited speed of tram and using the same old route along the whole tramway. Accordingly, no buffer zone is anticipated.

1.4.4 Construction time frame

With regards to the construction time frame for each component/segment. A tentative timeline is annexed to this report (see Annex 18). The construction activities will take 24 months and will start by December 2022. However, the construction plan that will be submitted by the contractor prior to the construction phase will detail all activities and the required time to complete each activity within each station. Based on similar projects carried by NAT (referring to the Metro line phase 3 and 4) the time plan might be adjusted during the construction activities.

1.4.5 Operational management of stations:

The discussion of potential commercial spaces and kiosk use during operation concluded to the fact that there will be an economic model inside the stations and under the viaducts. However, these plans have not been developed to date. Additionally, the operator (which has not been defined yet) might be willing to develop his own plans.

1.4.6 Current Status of Raml Tram and potential enhancements

The table below summarizes the Raml Tram potential enhancement

Table 1-2: Current Status of Raml Tram and Potential Enhancements

| Current Status of the Raml Tram | Potential Enhancement |
|--|---|
| <p>Route</p> <p>The two lines currently share large parts of the track which is segregated from the road traffic by unreliable fence except at road crossings. In addition, Line 5, known as Ukrainian Tram, is almost 10.8 km and it shares the same tracks as Lines 1 and 2 with a varied route. It takes the same route of line 2 from west to east and on its way back, it takes the same route of line 1 and then continues on the same track of line 2. The track and the track bed are generally in poor condition with the ballast having disappeared and replaced by vegetation. The rails themselves are joined by fishplates and these contribute to the noise generated by the tram. The track bed is of the same type throughout the line so there is no allowance made for noise or vibration attenuation at sensitive receptors. The overhead catenary poles appeared to be in relatively good condition. These were placed either centrally between the tracks or at the edge of the right of way depending on the local situation.</p> | <p>The new route is 14.45 km long and includes 25 stations. Considering the technical alignment, the curves of the existing Raml Tram have radiuses that are mainly over 100 m and up to 1000 m. The only exceptions are two curves that have 65 and 80 m radiuses near the current Raml depot on the northern part of the Sidi Gaber loop. As a result, it can be said that all the existing Raml Tram curves are suitable for a modern tramway rolling stock.</p> |
| <p>Stations</p> <p>The station stops are usually comprised of two-sided platform areas. The system is operated as an open system in which</p> | <p>Alexandria Raml tram stations are currently designed to accommodate for 49.5m x 2.6m trains. In order to allow high capacities</p> |

The Alexandria Raml Tram
Rehabilitation Project



| Current Status of the Raml Tram | Potential Enhancement |
|---|---|
| <p>access to and from the platform is uncontrolled. The station furniture is generally comprised of a shelter and a map of the tram route. At most stations the width of the platforms is somewhat narrow thereby confining the movement of passengers when a tram is in the station. The infrastructure of the stations require attention given their age and have suffered from spalling concrete, cracks and irregular surface paving in places.</p> <p>The pedestrian crossings are not set at regular intervals and are very minimal in which pedestrians normally cross anywhere along the line which is considered a safety hazard.</p> <p>The disposition of the stations along the line is mostly at-grade with one station, Al Gamaa, in a retained open cut.</p> | <p>on the line, it would be appropriate to use standard 68m x 2.65m trams that can accommodate for 600 passengers (considering 6 passengers / m²). As a consequence, stations length will have to be increased by about 20m</p> <p>The length of the station's platforms of the rehabilitated Raml Tram will have to be 70 m in order to accommodate for the proposed rolling stock. It is not recommended to have longer stations, as an excessive length would impede their integration in Alexandria's dense urban environment. In order to serve the corridor in a proper manner, existing station locations will be reconsidered to increase commercial speed and decrease costs; the distance between stations will be set at a minimum of 500 m with exceptions. Proposed stations will be set so as to serve the main trips generators and to maintain a distance between stations which is acceptable in order to serve the area in an efficient way. The total number of stations will be 25 stations.</p> |
| Depot | |
| <p>The existing Raml Tram depot is required for the maintenance of the rolling stock and all other equipment like rail-road truck, washing machine, lathe in pit, paint cab. etc. It is located next to the Mostafa Kamel station on the Sidi Gaber loop near the Mostafa Kamel station with area of about 17, 300 m² (as shown in the below figure). It is comprised of an administration block and two sheds where maintenance and overhaul activities take place. It is observed during the site visit that the sheds are quite old. The sheds are open at both ends so that they may be vented naturally. The existing depot is connected to public network for potable, sewage and electricity.</p> | <p>A major component of the Raml rehabilitation Project is to design and construct a new or refurbished depot for Raml tram line that will:</p> <ul style="list-style-type: none"> • Perfectly fit to the needs of modern tram vehicles, • Provide higher stabling and maintenance capacities to cope with the enlarged fleet, • Improve the efficiency of the maintenance activities, • Bring better working conditions for the operation and maintenance staff • The newly designed depot will take into account constraints such as: |

| Current Status of the Raml Tram | Potential Enhancement |
|---------------------------------|--|
| | <ul style="list-style-type: none"> • Diverse land dimensions, shape and topography • Extension of existing depots, • Different operational and environmental constraints <p>In addition to the depot, the stabling yard is expected to be located at the depot as well and store up to 30 trams of 68 meters (two vehicle units of 34 meters). The stabling yard shall allow for access to and from the workshop with transit in daily maintenance facilities or access to the tracks on which the lines are operating. The yard shall enable drivers and clear access to the interior of the tramway on every track with a minimum, a circulation width of 1.5m along one side of the tramways and 1m along the other side. Also, facilities to accommodate the cleaners will be provided. The proposed location of the stabling yard is above the existing and planned depot to avoid land acquisition, yet will require the installation of ramps, slopes for access to the tramways, reinforced ceilings of the depot, and construction at heights.</p> |

The figure below presents all Raml Tram stations located along the route and the second map below presents the preferred alignment.

The Alexandria Raml Tram Rehabilitation Project

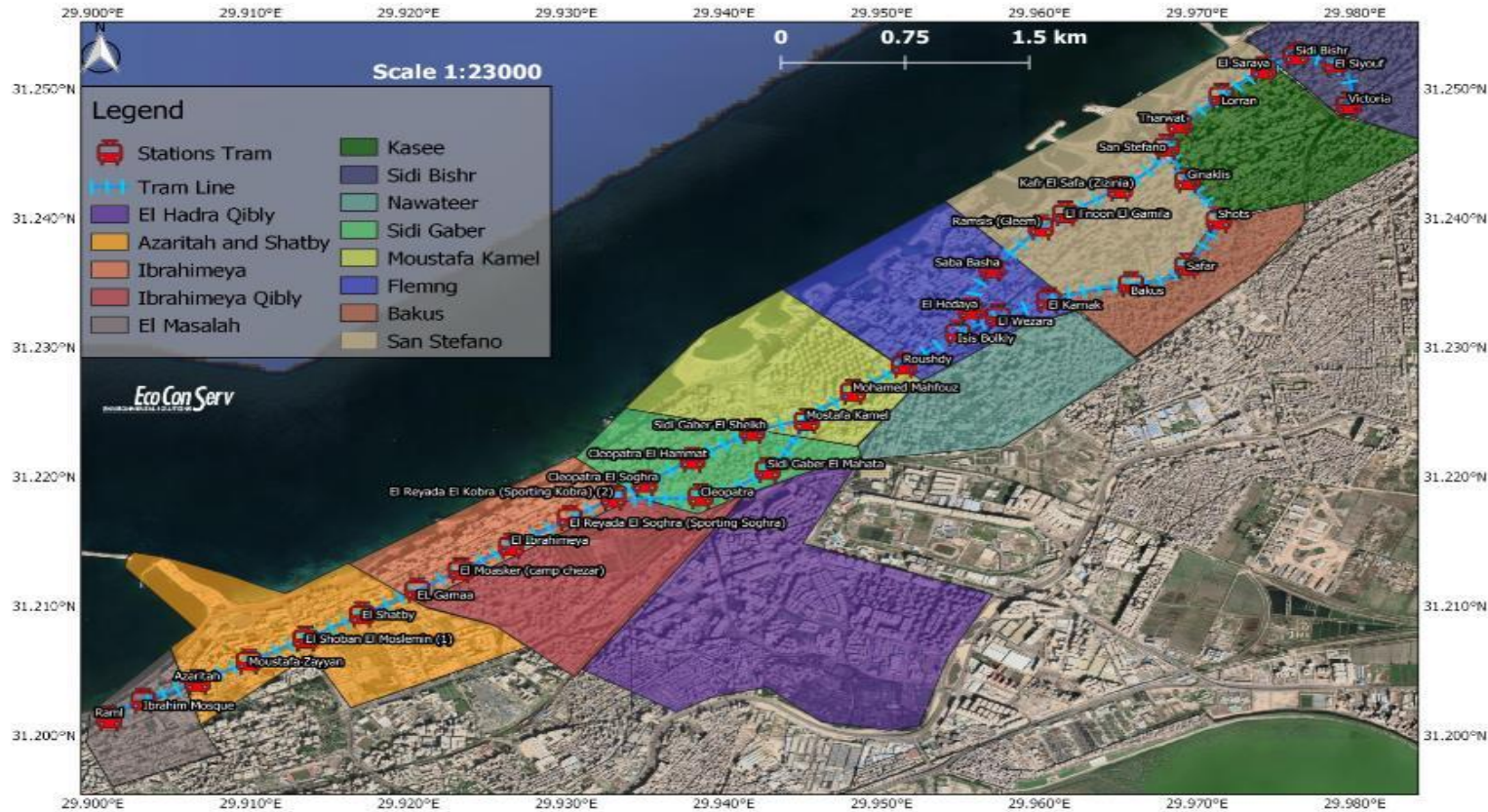


Figure 1-2: Layout of the Existing Raml Tram line with stations

The Alexandria Raml Tram
Rehabilitation Project

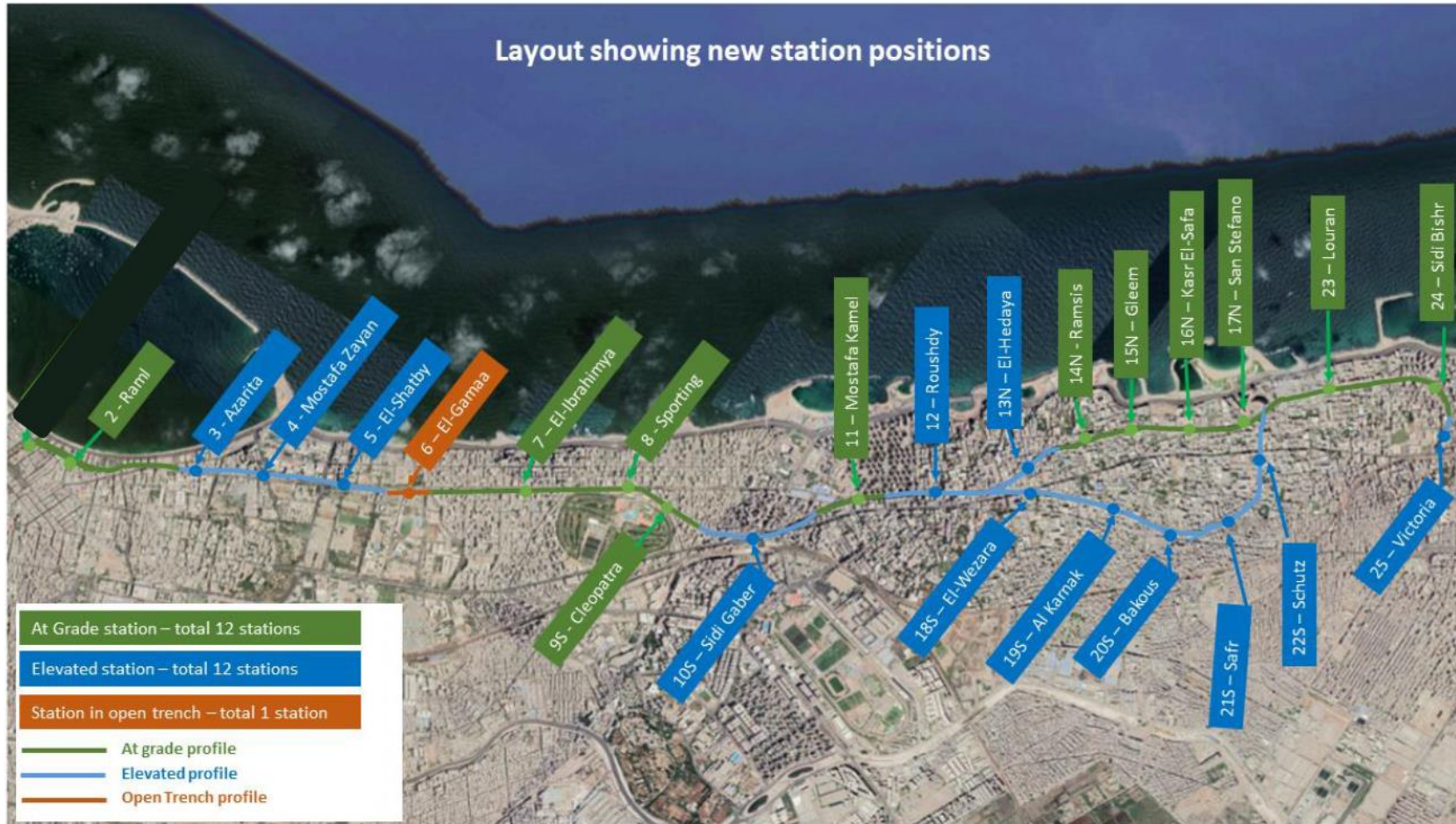


Figure 1-3 Proposed Corridor of the Rehabilitated Raml Tram Route

1.4.7 Project Efforts to Reduce Displacement

Given the fact that the project will result in various types of land acquisition and economic displacement, the first mitigation measure to be adopted in line with EIB and AFD standards is to avoid affecting assets, lands, etc. The Project adopted an avoidance mechanism through:

- Avoiding all shops/assets located outside the Tram route and right of way. Below is a list and a map of avoided shops and NGO.

Table 1-3: List of avoided shops and NGOs

| Station name | Shop Number | Tenant | Shop activity |
|----------------------|-------------|---|---|
| Sidi Gaber El Mehata | 9/1 | Refaat Ismail Ahmed Musa | Ticket reservation office (Sahar Al Sharq) |
| Sidi Gaber El Mehata | 9/2 | Amr Ahmed Said Fouad | Booking tickets |
| Sidi Gaber El Mehata | 9/3 | Tariq Ali Bayoumi Abdo | School supplies and photocopying, ice cream |
| Sidi Gaber El Mehata | 9/4 | Mehran Halabi Badawi Abdel Razek | Book trips |
| Sidi Gaber El Mehata | 9/5 | Alexandria Traffic Department | Traffic unit |
| Sidi Gaber El Mehata | 9/6 | Atef Mansour Khalil | Tea shop |
| Sidi Gaber El Mehata | 9/7 | Wafik Abdul Qadir Hassan Bakr | Religious books shop |
| Sidi Gaber El Mehata | 9/8 | Jihad Wafik Abdel Qader Hassan | Religious books shop |
| Sidi Gaber El Mehata | 9/13 | Effat Moselhi Ismail | NGO |
| Bolkly | 14/3 | Muhammad Ali Omar Amer | Juice shop |
| Bolkly | 14/4 | Dr .Magdy Morris Kamel | Pharmacy |
| Bolkly | 14/12 | Muhammad Al-Zanati Abdul Latif Abdullah | Cafe ,fish restaurant, koshary, etc. |

- Avoiding a house in Safr station that was about to be demolished by the Raml Tram Project.
- The Project will continue adopting its avoidance mechanism during the designing phase. Any avoided assets will be documented and shared with the EIB and AFD in the periodic report.

The Alexandria Raml Tram
Rehabilitation Project

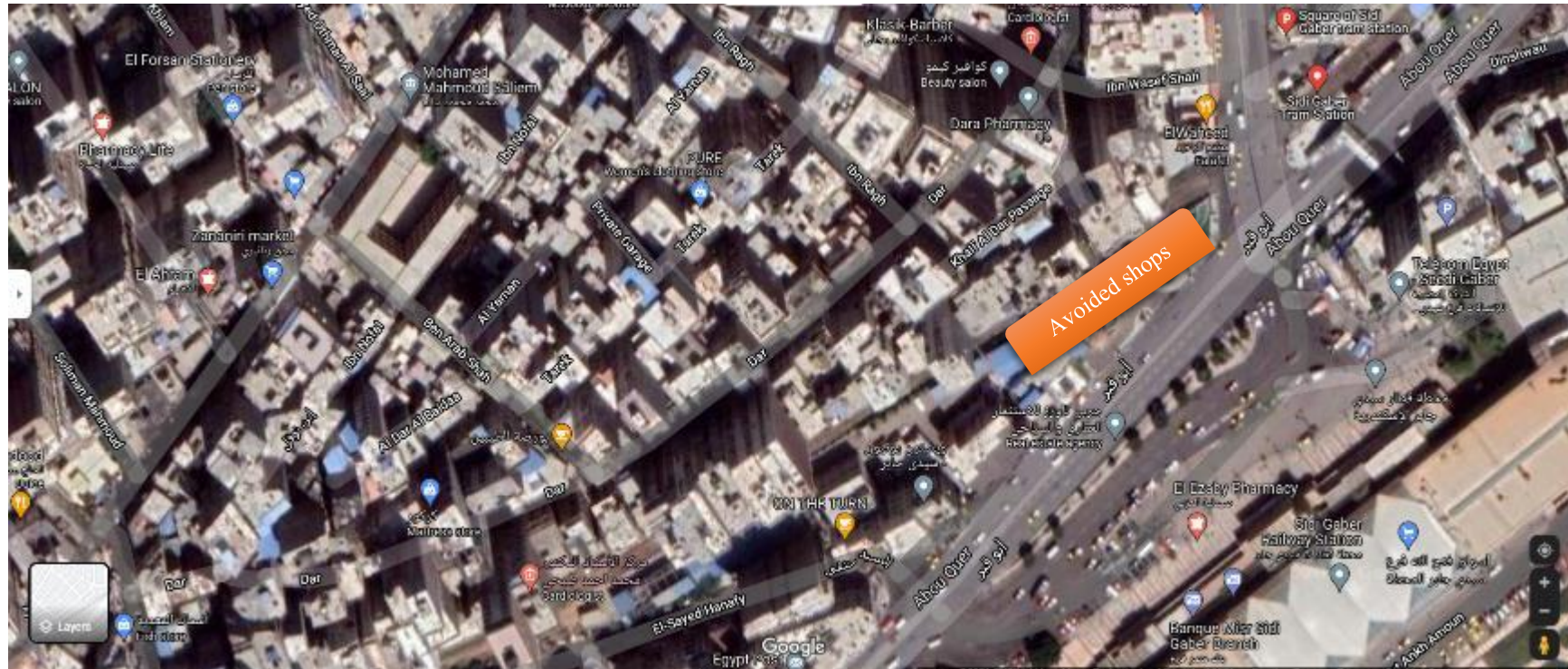


Figure 1-4: Avoided assets in Sidi Gaber station

1.5 Structure of the Report

This RPF is organized as follows:

1. Introduction
2. Institutional and Legal Framework
3. Project Affected People Socioeconomic Baseline Description
4. Project Adverse Impacts
5. Eligibility, Entitlement and Cut-off date
6. Compensation, Income Restoration and Resettlement Assistance
7. Public Consultation and Disclosure Arrangements
8. Monitoring of the RAP
9. Disclosure of the RAP
10. Implementation

2. INSTITUTIONAL AND LEGAL FRAMEWORK

Raml Tram Rehabilitation Project will be governed by the Egyptian national legislations, the EIB Environmental and Social standards (October 2018), and AFD Environmental and Social Risk Management Policy (October 2017). AFD also follows the World Bank's ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (June 2018) and ESS10: Stakeholder Engagement and Information Disclosure.

2.1 Applicable National Legal Framework

It is the policy of the Government of Egypt to compensate or offer assistance to people whose lands and properties are affected by projects undertaken by the Government. This section will discuss the means, the causes, and the competent authorities responsible for the implementation of the provisions and rules of administrative law, civil law, in addition to the law on the expropriation of private property for the public interest. In addition, this section also covers the restrictions, the conditions of legality of the procedures applied by the administration at its disposal, and the consequences of the expropriation of real estate, in addition to the legal procedures of possession of private property.

The Government of Egypt has a policy to pay compensation or offer assistance to people whose lands and properties are affected by projects undertaken by the Government. The most relevant Egyptian laws that regulate these issues include:

- The Egyptian Constitution (2014);
- Law 10 of 1990 for the Expropriation of Ownership for Public Interest; amended by Law number 1 of year 2015 and Law number 24 of year 2018 and Law 187 of year 2020.
- Egyptian Civil Code;

As a brief discussion for all applicable legislations, the following are the main legislations applied to the project.

2.1.1 Egyptian Constitution (2014)

In January 2014, the Egyptian Constitution was revised in a referendum with the following relevant laws.

2.1.2 Land Acquisition Laws

- **Law Number 10 of year 1990 amended by Law No. 1 of year 2015, Law No. 24 of year 2018 and Law No 187 of year 2020 on Property Expropriation for Public Interest**

Identifies transportation projects as Public Interest activities, and describes acquisition procedures as follows:

- The procedures start with the declaration of public interest pursuant to the presidential decree accompanied with memorandum on the required project and the complete plan for the project and its structures (Law 59/1979 & Law 3/1982 provided that the Prime Minister issues the decree).
 - The decree and the accompanying memorandum must be published in the official newspapers.
 - A copy for the public is placed in the main offices of the concerned local Government unit.
- **Civil code 131/1948 Articles 802-805 recognize private ownership rights.**
 - Article 802 states that the owner, pursuant to the Law, has the sole right of using and/or disposing his property.
 - Article 803 defines what is meant by land property
 - Article 805 states that no one may be deprived of his property except in cases prescribed by Law and would take place with an equitable compensation.

2.2 Applicable EIB, WB and AFD Policies and Standards

2.2.1 EIB Environmental and Social Standards (October 2018)

2.2.1.1 Standard 6 pertaining to Involuntary Land Acquisition

Standard 6 pertaining to Involuntary Land Acquisition sheds light on various aspects that necessitate the development of an instrument that describes an organized mechanism for land acquisition e.g. Resettlement Policy Framework or Resettlement Action Plan.

Standard 6 stipulated that all affected persons will be paid fair compensation in good time for expropriated assets. Compensation will be provided for any loss of personal, real or other property, goods or assets, including rights or interests in property, for instance, land plots and

house structures, contents, infrastructure, mortgage or other debt penalties. Where land has been taken, affected persons will be compensated with land of commensurate quality, size and value, or better. The promoter is required to offer to the affected persons an informed choice of either compensation in kind (land-for-land; land plot and house to replace affected land plot and house) or monetary compensation at the outset. The promoter is expected to comply with the choice stated by the affected persons.

Standard 6 sheds light on the main contents of the RAP and the RAP documents e.g. the census and baseline information, eligibility criteria, the cut-off date, resettlement assistance, stakeholder engagement, grievance management, etc.

2.2.1.2 Stakeholder Engagement Standard 10

This standard shed light on the necessity to engage project stakeholders at early stage of the project. The nature and extent of stakeholder engagement will reflect the nature and complexity of the project and its stakeholders, the project risks and potential adverse impacts on individuals, communities and other impacted stakeholders, and the sector. Stakeholder engagement processes will therefore vary across projects and different financing instruments. Beyond any single operation financed by the EIB, stakeholder engagement is recommended as good and necessary practice for promoters to adopt more generally.

2.2.2 AFD Applicable Legislations Pertaining to Involuntary Resettlement and World Bank ESS 5 and 10

AFD is committed to adhere to the Environmental and Social Risk Management Policy (October 2017). AFD also follows the World Bank's ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (June 2018) and ESS10 pertaining to Stakeholder Engagement and Information Disclosure.

The Environmental and Social Risk Management Policy (October 2017) illustrates the commitment of AFD financed project to adhere to the Best Practises. AFD's financing decision is based on a preliminary analysis of the environmental and social assessment documentation. It involves a detailed Environmental and Social Assessment (ESIA) for projects in both the High and Substantial Risks category. It may be in a simplified form (e.g. a specific chapter of the feasibility study) for those in the Moderate Risks category. Generally speaking, no environmental and social assessment is required for projects in the Low Risks category. The detailed ESA is conducted at the same time as the feasibility study. It is submitted to the consultation of the persons and groups potentially affected and aims to allow the preparation

of an Environmental and Social Management Plan (ESMP). In the event of an involuntary physical and/or economic displacement, the ESMP is complemented with a Resettlement Action Plan (RAP).

The objectives and content of the detailed ESIA, ESMP and RAP comply with the provisions of the World Bank's Environmental & Social Standard for the Assessment and Management of Environmental and Social Risks and Impacts. For High Risk operations, the detailed ESIA, as well as the related environmental and social management documents (e.g.: ESMP, RAP), are analysed and must be validated by AFD prior to the financing approval. For operations with substantial E&S risks (as is the case on this Project), a minima ESIA must be available and have received no objection from AFD prior to the financing approval; other required E&S documents can be provided later. An Environmental and Social Commitment Plan (ESCP) must be drafted, approved by the lenders, and is appended to the loan agreement. .

2.2.2.1 The World Bank ESS 5 pertaining to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The WB ESS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land, or loss of shelter), economic displacement (loss of land, assets, or access to assets leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts.

Involuntary resettlement will be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. It is worth mentioning that Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

2.2.2.2 The World Bank ESS 10 related to stakeholder engagement and information disclosure

This ESS emphasizes that the importance of applying meaningful stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available Project-related information as early as possible in the Project cycle and in a manner, format,

and language appropriate for each stakeholder group is important. Formats to provide information may include presentation printouts, nontechnical summaries, Project leaflets, and pamphlets. Ideally, maps of the Project area and nontechnical drawings should be included in the materials. Documents used in stakeholder consultation should be made available to stakeholders.

Documentation should also be accessible for stakeholders with sensory disabilities, for instance, through providing documents in Braille or engaging a sign language interpreter at a consultation meeting, as appropriate.

In cases where literacy levels are low, additional formats like location sketches, physical models, and film presentations may be useful to communicate relevant information. The Borrower should help the public to understand technical documents, for instance, through the publication of simplified summaries, nontechnical background explanations, or access to local experts.

Special efforts should be exerted to inform, engage with, and understand disadvantaged or vulnerable groups with regard to the impacts of the Project on them, the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances.

It is important to remain responsive to requests for information from Project-affected parties and other interested parties throughout the Project cycle. It is helpful to set up appropriate systems to make Project information available on a continuous basis. For instance, a website or other media may be useful to provide, and regularly update, Project-related information.

2.2.3 Gaps between National and International legislations and proposed mechanisms to bridge the gaps

Based on the discussions carried out with NAT, APTA and revision of the developed documents related to land acquisition prepared previously by NAT, significant gaps were defined between Egyptian land acquisition law No 10 of year 1990 and EIB standard 6 and WB ESS 5. Additionally, detailed information was presented about how gaps must be bridged. On the other hand, all requirements of the ESS 10 and standard 10 of EIB are included under consultation requirements in the table below. .However, there are still some gaps that will be solved by the Project.

The Alexandria Raml Tram
Rehabilitation Project



Table 2-1: Gaps between National and International legislations and proposed mechanisms to bridge the gaps in Alexandria Raml Tram Rehabilitation Project

| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|--|--|--|--|
| Preparation of a RAP | Prepare land acquisition decree that sheds light on the required assets and lands that must be expropriated | ESS 5 of the WB and EIB Standard 6 requires proponents to prepare a RAP or Livelihood Restoration Plan. | <p>An RPF is being prepared and a RAP will be prepared in full compliance with EIB standard 6 and the WB ESS5.</p> <p>NAT will approve the RAP and implement it in full compliance with the funding agencies requirement.</p> <p>NAT also will adhere to document all activities in order to facilitate funding agencies monitoring and evaluation of the RAP requirements.</p> |
| Livelihoods and Standards of Living | In a situation where involuntary resettlement causes a temporary loss of business, Egyptian law stipulates that entitlement for compensation for temporary losses of business is determined by a committee. However, compensation paid by the committee may not be at market price or full replacement cost. | Project impacts on livelihoods and standards of living are the central focus of ESS 5 of the WB and EIB Standard 6. Compensation for loss of assets must be at full replacement cost. Proponents must provide other assistance to improve or at least restore livelihoods and standards of living. This is one of the challenges of the project as the entity responsible for valuation of temporarily or permanent loss of income is the Housing Surveys (<i>Behoth El Eskan</i>) in Alexandria Governorate and they abide to the | <ul style="list-style-type: none"> The Compensation Committee must consider the market value and the full replacement cost. NAT in full cooperation with the RPF consultant are preparing a memo to the Minister of Transport and NAT chairman in order to get official approval on all resettlement costs. The formal approval will enable NAT to implement it despite any potential resistance from the Compensation Committee. Additionally, the owner of the Project (NAT/MOT) are members in the compensation committee. Finally, the PAPs have representation in the committee. The RAP will shed light on all aspects that must be considered to properly value the compensation e.g. adding the cost of installation of electricity in the new units, potable water & sanitary (if needed) and any transaction support. Additionally, provision of |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|---|--|--|---|
| | | Egyptian legislations. | <p>transitional support, NAT should support the PAPs in issuing the license of shop activity through provision of official letters to various entities responsible for license (e.g. health directorate for health certificates...etc)</p> <ul style="list-style-type: none"> NAT will continue consulting with the PAPs until reaching acceptable value of compensation. This process starts after issuing the Public Interest Decree and continue till the completion of compensation activities. No agreement can be made by NAT with the PAPs until the compensation committee is established and compensation modes are discussed on the committee level. However, the committee should adhere to valuation NAT will also compose a Committee that manages any grievance related to land acquisition/economic displacement and they will give the full right to the aggrieved person to submit more than one complaint. Also, all affected people have the full right to file a law suit and take legal action if they are not satisfied with the compensation. |
| <p>Land Acquisition, Expropriation and Negotiation</p> | <p>In Egyptian laws and regulations, the entity in charge of expropriation prepares the list of property holders, informs them officially and obliges them to sign. They are given the right to object within 30 days of the</p> | <p>ESS 5 of the WB and EIB Standard 6 encourages the use of negotiated settlements to avoid expropriation and forced evictions. Expropriation is only to be used as a last resort, if good faith negotiations fail and those</p> | <ul style="list-style-type: none"> Raml Tram Project has no private land acquisition activities. The required land is owned by Alexandria Governorate. This type of land abide to transfer of ownership procedures. |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|---|---|---|--|
| | disclosure of lists. | affected reject compensations that meets the requirements of ESS 5 of the WB and EIB standard 6. | |
| Scope of Displacement | Not addressed. | ESS 5 of the WB and EIB Standard 6 require proponents to avoid, and, when avoidance is not possible minimize displacement by exploring alternative project designs. | <p>NAT exerts a lot of effort to minimize and avoid any unnecessary resettlement due to main reasons:</p> <ol style="list-style-type: none"> 1- Trying to adhere to lenders requirements 2- To reduce the value of compensation to be paid <p>Accordingly, NAT avoids any impacts on the surrounding communities and limits construction work to the current route of the Tram.</p> <p>NAT might further avoid some shops in Raml Station (if needed and technically feasible)</p> |
| Consultation and PAPs engagement | PAPs are provided with timely and relevant information. A Cabinet Decree is published for any expropriation/economic displacement and two weeks later surveyors can enter the area in question. They are also notified of compensation and, within 5 months, of evacuation. | Requires that RAP or Livelihood Restoration Activities are implemented with appropriate disclosure of information. Such processes must ensure that the perspectives and interests of women and other vulnerable groups are adequately considered. | <p>NAT in full cooperation with compensation committee will consult with various PAPS including women, people with disability and old people.</p> <p>Consultation activities has started between NAT and APTA.</p> <p>In full compliance with the EIB/AFD requirements and the Egyptian law No 10 of year 1990, NAT will consult with each PAP and tenants of shops to share with them information about the following:</p> <ol style="list-style-type: none"> 1- Brief information about the project and potential impacts 2- Project impacts on the tenants of shops |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|-------------------------------|--|---|---|
| | | | <ul style="list-style-type: none"> 3- Mitigation and compensation procedures 4- Required official documents needed to compensate the PAPs 5- Grievance mechanism and ability to appeal to court 6- Time plan of compensation and remedial actions 7- Any transitional support to be provided <p>NAT will inform the PAPs about the compensation procedures that will be applied. NAT Community liaison officer and the real estate department will share information about all types of mitigation measures including but not limited to, compensation, capacity building, and transitional support. All consultation activities will be carried out at neutral venues with no presence of security people. The consultations will continue until reaching an agreement. If agreement was not reached with the PAPs, they will have the full right to file a lawsuit without affecting their recipient of the compensation. It is essential to shed light on the common practise that almost all PAPs get accustomed to do which is they resort to court despite the amount of compensation, as the court always raises the value of compensation by at least 25%.</p> |
| The Right of Squatters | Not included in the legislation (Applied cases for resettlements revealed that squatters have been compensated as a result of political sensitivity) | The right of squatters is not addressed in Egyptian law, the Banks' ESS and standards requires squatters be provided with compensation for loss of structures/loss of economic activities/livelihoods and resettlement assistance when they | There are no squatters under Raml Tram Project as all PAPS have official contracts with APTA and no squatters were identified With regards to street vendors, the impacts of the Raml Tram Project on them is negligible, as the itinerant vendors will be working in other modes of transportation e.g. tram – train- mini buses and buses. Alternatively, they can install their carts, stall, or stand close to the construction fence. (detailed discussion is |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|---------------------------------------|--|--|---|
| | | <p>are affected by projects financed by the Bank, but no compensation for the land the squatters are occupying. Egyptian legislation has not recognized the rights of squatters. There have been resettlement cases in which the Egyptian government compensated squatters because of political sensitivity to the problem rather than because of provisions in the law or in compliance with the Bank's policy.</p> | <p>presented under section 3.6 of this report)</p> |
| <p>Resettlement Assistance</p> | <p>The Egyptian law makes no provision of resettlement assistance to project affected people</p> | <p>ESS 5 of the WB and EIB Standard 6 require offer support for a transition period. They further require that the cost of this assistance will be included in the overall RAP .</p> | <p>Resettlement Assistance will be applicable to project activities in terms of:</p> <ol style="list-style-type: none"> 1- Support the PAPs in moving their goods, belongings ...etc 2- Support the PAPs to issue licenses and operation registers by providing them with the required fees (if PAPs are willing to) 3- Provide additional support if needed by the PAPs (to be discussed during consultation with the PAPs 4- Provide support to workers in terms of enabling training opportunities 5- Provide support to street children and homeless people through communicating with the social solidarity directorate to accommodate them in shelters |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|-------------------------------------|--|---|--|
| Grievances | <p>Specialized committees are formed for that time and purpose. One month is allowed to object to the decision of resettlement. Four months are allowed to object to the compensation value. The PAPs also can resort to governmental portal to submit any complaints https://www.shakwa.net.eg/GCP/Default.aspx E-mail address for complaints government portal info@shakwa.net.eg</p> | <p>ESS 5 of the WB and EIB Standard 6 require the establishment of an effective grievance mechanism, which seeks to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate, readily accessible, at no cost to the party that originated the concern, and does not impede access to judicial or administrative remedies.</p> | <p>NAT has a grievance mechanism that will be applied to the Raml Tram. The committee will manage all complaints, including, the complaints to be raised by the surrounding communities and commercials that might be accidentally affected during the construction phase.</p> <p>The Grievance Mechanism required to be fine-tuned as reported in Chapter 7 of this report</p> |
| Cut-Off Date and Eligibility | <p>Expropriation is subject to a Cabinet Decree and two weeks following this, surveying takes place. Compensation will not be provided for assets put in place after the publication. The law regulates land acquisition for and involuntary resettlement of properties with legal titles only.</p> | <p>ESS 5 of the WB and EIB Standard 6 require that a cut-off date only be declared following appropriate disclosure and consultation. ESS 5 of the WB and EIB Standard 6 considers people eligible for compensation if they have a legitimate interest in immovable assets located in the land take area that was established as of the cut-off date. Legitimate interest is not synonymous with ownership, but rather encompasses formal legal</p> | <ul style="list-style-type: none"> • With regards to the cut-off date, it will be identified after finalizing the official census survey of all PAPs as the cut-off date is dependent on the final official census. This can be done after issuing the Public Interest Decree. Accordingly, all assets excluding the closed ones and the ones used by APTA will be considered as PAPs. • NAT sent an official letter to APTA to inform them about not leasing any shops. Despite the fact that NAT has not issued the Public Interest Decree to date, APTA must adhere to not leasing any shops. |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|---------------------|---|--|--|
| | | ownership and use rights; customary ownership and use rights that are recognizable under national law; and unrecognisable rights or claims. | |
| Entitlements | <p>Compensation (and not replacement cost) is evaluated according to market value at the time of acquisition. The prevailing process is that a specialized committee formed by government conduct the compensation assessment. Affected property owners and rights holders are officially notified of evacuation within a period not to exceed five months from the date of their notification of compensation. The law covers land acquisition for and involuntary resettlement of properties with legal titles only. Daily wage workers are not entitled for any compensation. However, permanent workers might receive six-month</p> | <p>Compensation for loss of assets is provided at full replacement value. Recognised and recognizable ownership rights are compensated equally with full replacement value. Payment of in-kind compensation is generally preferred over in-cash compensation. Those without legally recognizable claims to land will be entitled to compensation at full replacement cost for lost crops and other improvements to land.</p> | <p>NAT will adhere to the funding agencies requirements through applying the following:</p> <ol style="list-style-type: none"> 1- NAT will approve on the RPF and the RAP and all procedures included in the RAP. 2- The entitlement must consider the full replacement cost of the tenants that includes the revenue of the shops, moving goods and belongings, cost of licences and infrastructure if needed ...etc. The entitlement section sheds light on detailed process of valuation and evidences. 3- All workers with or without official contract will be entitled to compensation based on their monthly salary. Those who has no contracts should submit a valid evidence of payment (e.g. receipts, insurance..etc) They will also be trained to find alternative work. Additionally, they will be moved with the shop tenants. NAT should consult with workers in order to warrantee that they were properly compensated. |

The Alexandria Raml Tram
Rehabilitation Project



| Topic | Egyptian Requirements | International Standards | How to Bridge the Gap |
|----------------------------------|---|--|---|
| | salary. | | |
| Timing of Compensation | The entity requesting acquisition deposits the amount of determined compensation within a period not exceeding a month before land acquisition. | The client will take possession of land and related assets only after compensation has been made available. | NAT will disburse the compensation prior to any demolition works or construction takes place. All tenants and workers will receive their compensation before shops are demolished. NAT will inform the PAPs at least three months before eviction of shops, particularly workers in order to be able to find an alternative shop or work. |
| Monitoring and Evaluation | Not addressed. However, there is a financial audit from Accountability State Authority. | Monitoring and evaluation must form a component of all livelihood restoration and resettlement action plans. | NAT is committed with the monitoring and evaluation system presented in Chapter 8 of this report. |

2.3 Egyptian Institutional Framework

Given the nature of project impacts which is mainly related to economic disturbance, **the institutional framework will be tailored** to the type of impacts.

NAT is responsible for the proper implementation of the RAP, including stakeholder engagement and managing the grievance mechanism. NAT is the responsible entity for identifying the lands needed for the project. They coordinate with the Governorate of Alexandria (Housing Survey department) that will be responsible for disbursing the compensations.

Additionally, a Compensation Committee (CC) is to be formulated from various governmental entities declared by Land Expropriation Law number 187 of year 2020²⁹. The CC will be formulated based on a decree from the governor or the Minister of Transport. It will be composed of representative of General Authority of Government Services (GAGS), the Directorate of Housing and Utilities (DHU) and the Directorate of Real Estate Taxes (RET) in the governorate level. Department of Land Surveying (LS) in Alexandria Governorate, Housing Surveys (HS) inside Governorate Authority, and APTA. In addition to representative of the owner (NAT and MOT) Moreover, the district authorities and other units might attend. NAT and the Ministry of Transport play a major role in the compensation process by issuing Public Interest Decree and provision of compensation in line with the international standards. **NAT will prepare a memo to his excellency the Minister of Transport in order to approve on**

²⁹ Law No. 187 of 2020 Amending some provisions of Act No. 10 of 1990 concerning expropriation of immovable property for public interest.
Article (6)

A Committee; formed from a representative of the Survey Authority as chairperson, and members that delegated from each of the Directorate of Agriculture, the Directorate of Housing and Utilities, and the Directorate of Real Estate Taxes in the governorate; by a Decree of the Minister of Water Resources and Irrigation; shall estimate the compensation to be paid. The job level of each member must not be less than level (A). The members of this Committee will be changed every two years with authority over the estate if it falls within the jurisdiction of the New Urban Communities Authority or the agencies of its cities.

The compensation is estimated according to the prices prevailing at the time of the issuance of the public interest Decree plus (20%) twenty percent of the estimated value. The entity that requests the expropriation shall deposit the full amount of the compensation, within a period not exceeding three months from the issuance date of the Decree, in an account that generates revenue of the banks that the state wholly owns, under the name of the entity that conducts the expropriation procedures.

After the full payment of the amount of the compensation as referred to in Article (13) of this Act, the account surplus shall transfer to the entity that requested the expropriation.

Where the entity that requested the expropriation is late in depositing the compensation by the previously referred date, that entity shall pay additional compensation for the delay period according to the interest rate set out by the Central Bank. Such compensation will be payable to the concerned parties.

The compensation may be paid fully or partially in kind with the approval of the owners.

all elements of compensation requirements. Upon his approval, the CC will adhere to all compensation requirements. The roles and responsibilities are highlighted below:

Table 2-2: Institutional Arrangement of the Project

| Institution | Tentative Roles and Responsibility* |
|---|---|
| Prime Minister | His Excellency is responsible for issuing the Decree of Public Interest after receiving the memo from the Minister of Transport. The Public Interest decree must be published in the Egyptian Gazette after HE approval. |
| Ministry of Transport | <p>They receive the memo of Public Interest for review and upon the Minister approval, the memo is shared with the Cabinet to issue the Public Interest Decree by the Prime Minister .</p> <p>The Minister will approve the compensation mechanisms and valuations presented in the RPF and the RAP. His approval will be adhered to by the Compensation Committee.</p> |
| National Authority for Tunnels (NAT) | <p>NAT is responsible for the proper implementation of the RAP, including stakeholder engagement and managing the grievance and redress mechanism under the RAP and bridging the gaps to ensure that compensations are carried out at full replacement cost and that livelihood restoration measures/resettlement assistance are provided.</p> <p>NAT has an outstanding experience regarding land acquisition and compensation activities that have been implemented by the Compensation Committee (CC) under the Real Estate Department within NAT. It consists of experienced Lawyers (4 people) headed by a general manager of 20 years' experience. Additionally, a Community liaison Officer will be assigned to shoulder the responsibility of the GM and information sharing. In the meantime, there is a room for supporting NAT via a specialized firm to be outsourced in order to provide technical assistance to NAT (if necessary).</p> <p>NAT is the main organization responsible for the provision of compensation, monitoring and document various activities of resettlement.</p> <p>Their tasks are as follows:</p> <ol style="list-style-type: none"> 1- Identify the needed lands (public-private (if any) to be obtained based on transfer of ownership in cooperation with the consultant (SYSTRA) 2- Prepare memo to be shared with the Minister of Transport about the Public Interest Decree pertaining to involuntary resettlement and reallocation of public assets 3- A memo indicating the project that needs to be implemented and |

The Alexandria Raml Tram
Rehabilitation Project



| Institution | Tentative Roles and Responsibility* |
|---|--|
| | <p>the initial compensation that must be deposited into the account of the Authority competent to execute the expropriation procedures as referred to in Article (6) of this law number 187 of 2020, within a month starting from the date of the issuance of the Public Interest Decree.</p> <p>4- . Document the whole compensation activities</p> |
| The Governorate Entities | |
| <p>1- General Authority of Government services</p> | <p>They are the entity responsible for tenants compensation. They also have strong presentation in the compensation committee.</p> <p>They might be selected to be member of the Raml Tram Compensation committee.</p> |
| <p>2- Department of Land Surveying in Alexandria Governorate</p> | <p>Most probably, the role of land surveying department will be limited. The chairman of the committee will be from the land surveying department.</p> <p>They will not be a member of the Raml Tram Compensation committee.</p> |
| <p>3- Directorate of Housing and Infrastructure Research</p> | <p>They are responsible for setting the alternative resettlement options for the affected people and participate in all operational procedures concerning defining compensation value and setting improvement actions within informal settlements.</p> <p>They might be selected to be a member of the Raml Tram Compensation committee.</p> |
| <p>4- Housing surveys inside Governorate Authority</p> | <p>They are the main entity to identify the exact owner or tenant of any commercial asset. They prepare a census survey about the project affected asset that work as a basis for the compensation.</p> <p>They will not be a member of the Raml Tram Compensation committee.</p> |
| <p>5- Agriculture Directorate</p> | <p>They are part of the compensation committee to be formulated on the Governorate level and they will be provide price lists of affected trees of the private garden.</p> <p>They will be a member of the Raml Tram Compensation committee</p> |
| <p>6- Alexandria Passenger Transportation Authority</p> | <p>They will be responsible for relocation of their workers during construction phase. They will share information with NAT about APTA workers who were relocated due to the Raml Tram rehabilitation.</p> <p>They might be selected to be member of the Raml Tram Compensation committee.</p> |

* Roles and responsibilities will be better defined upon the final selection and formulation of the committee

2.4 Property Laws and Regulations in Egypt

The Civil Code regulates ownership of land in Egypt and is supplemented by some general doctrines of law. There are also specific laws in relation to the ownership of real property. The types of land ownership that might be faced on the tramway are summarized below:

Table 2-3: Types of real property rights and methods of transferring ownership

| Type | Details | Applicability |
|---------------------------------|---|---|
| Right of Use | Usufruct: This is a right to use a property owned by another person for a specific period of time and on terms agreed between the parties. A person who holds a usufruct right over another person's property has all the rights granted by law to the owner, except for the right to sell or transfer the ownership of such property. Rights of usufruct are transferable real property rights. | The shops and assets located inside the stations are under lease right by APTA and no usufruct right has been granted. |
| Lease Right | Lease Right: A lease is "a right in personam" that grants the lessee the right to rent a property from a lessor for a specified period. A lease guarantees to the lessee the use of the leased property, and guarantees to the lessor regular payments from the lessee. | |
| Rights of Ownership | Inheritance: Owned property and old leased property can be inherited after the death of its owner. For Muslims, inheritance is governed by the principles of Islamic Sharia and for non-Muslims it is governed by their own religious principles. Ownership of property is transferred to heirs after the death of an owner and the issuance of an inheritance order from the competent court determining the heirs and their relevant ownership percentages. Transferring the ownership of real property to another person by inheritance is also possible using a Will in accordance with the principles of Islamic Sharia, as long as the value of such property does not exceed one third of value of the total estate of the deceased. Property will be gifted using a gift agreement provided the customary regulations to execute transfers are complied with. | Few numbers of shops located in the stations are inherited by the tenants. It was leased according to the old renting law that stipulates unlimited lease period and inheritance is acceptable. |
| Ownership of Real Estate | Reallocation Rights Reallocation of land is mainly between two governmental entities. They can transfer the lands based on Public Interest Decree. Land reallocation is most of time free of charge. However, in certain conditions, compensation might be paid. | Applicable to the route of Tramway and the stations to be transferred from APTA to NAT |

3. PROJECT AFFECTED PEOPLE SOCIOECONOMIC BASELINE DESCRIPTION

3.1 Overview

This section provides an overview of the different types of livelihood activities found along the alignment and which may experience temporary or permanent impacts in relation to the establishment of the Raml Tram Rehabilitation Project. A more detailed description of each type of activity and group of affected people is presented under the following sub-sections. Potentially affected livelihood activities and groups of people include the following:

- 1- Shops and restaurants located at the Tram stations: Tenants will be permanently deprived of the leased shops when construction is completed, while some might also experience temporary impacts during construction in the event that access to their business is blocked or not permitted. Sales personnel and workers employed at the shops may also lose their jobs.



Figure 3-1: Tenant of shop



Figure 3-2: Sales persons in a shop

- 2- Mobile and semi-mobile Street vendors will temporarily lose access to the avenue where they trade in their good which might result in temporary loss of income during the construction period in case relocation is not successful.



Figure 3-3: Mobile vendors



Figure 3-4: Semi mobile vendors

- 3- Street children and homeless people will be evicted from the stations during construction activities and will permanently lose their shelters.
- 4- Mosques will be permanently demolished. Accordingly, the operators of one mosque will lose their job.



Figure 3-5: Homeless street children



Figure 3-6: A mosque

- 5- Shops outside the stations and along the RoW: NAT has confirmed that access to local shops and businesses will be guaranteed during construction and therefore it is assumed these shops will not experience any loss of access during construction. However in the unlikely event of unforeseen changes to the construction design, owners, tenants, and workers may potentially be temporarily impacted during construction in case access to the business is blocked or not permitted. This is discussed in more detail in Section 4.



Figure 3-7: Examples of shops located outside the stations and RoWs

- 6- Transport operators: Tuk tuks, minibuses, and bus drivers operate along the Project alignment. These operators are not expected to experience any significant temporary or permanent impacts in relation to the Project.



Figure 3-8: Microbuses within the area of influence in Mansheya



Figure 3-9: Tuk tuks and taxi drivers within the area of influence

3.2 Methodology of baseline survey

The baseline survey process adopted multilevel of data collection. The study team adopted participatory rapid appraisal approach which employs all sources of data that support the verification and accuracy of data collection. Additionally, the study team collected all available secondary data from various resources about the project affected people.

The study team developed structured questionnaires that were applied to tenants of shops, street vendors and workers. Annex 19 presents all surveying tools used.

Additionally, an FGD guide and an in-depth interview guide were developed to be applied to social solidarity directorate, Caritas NGO, drivers of Tuk tuks and minibuses.

The data collection took place in December 2020 and supplemented in October – December 2021.

- Almost all tenants were interviewed in their shops;
- All street vendors who were found during surveying date were interviewed at the stations; and
- A sample of workers were randomly selected from different shops on an interval of 1 per each 4 workers. The workers sample represents about 26.3% of the total affected workers. The level of confidence is about 95%. The majority of workers were presented in the surveyed sample, namely, permanent- casual, mosque workers and part time workers. In the RAP, all workers must be interviewed after completion of the formal census study.

This section will shed light on the categories that will be affected by the Raml Tram project. Below is the baseline description based on each affected category:

3.3 Tenants of shops/ kiosk

The project affected people (PAP) reported are mainly the shop tenants. Excluding the shops leased by public utilities (e.g. the traffic department), the remaining are the community members who will be affected by the project as the public utilities have alternative branches where their laborers can be accommodated in.

The tenants of the shops (91) have signed contracts with APTA. However, (36) of them have an expired contract before 2022. In fact, all the tenants with expired contracts continue paying the lease value until end of 2021. APTA informed them that their contracts came to their end and they were obliged to leave their shops a long time ago. However, **the tenants are still operating their shops and pay the tenancy fees**. APTA reached an agreement with them to leave the shops. Annex 1 presents a list of all affected assets. Annex 2 contains detailed maps of the affected shops



Figure 3-10: A Small kiosk located in San Stephano station

Figure 3-11: Example of a shop in a station

3.3.1 Age Categories

The age distribution of the PAPs reveals that 26.3% of the total affected people fall under the age category of 40-49 years. The younger age group (20-29 years old) represents 9.3% of the total affected PAPs. While the older age group, 60+ years old represents about 21.0% of the total PAPs. The distribution by age category draws attention to the importance of making specific arrangements for old people above 60 years.

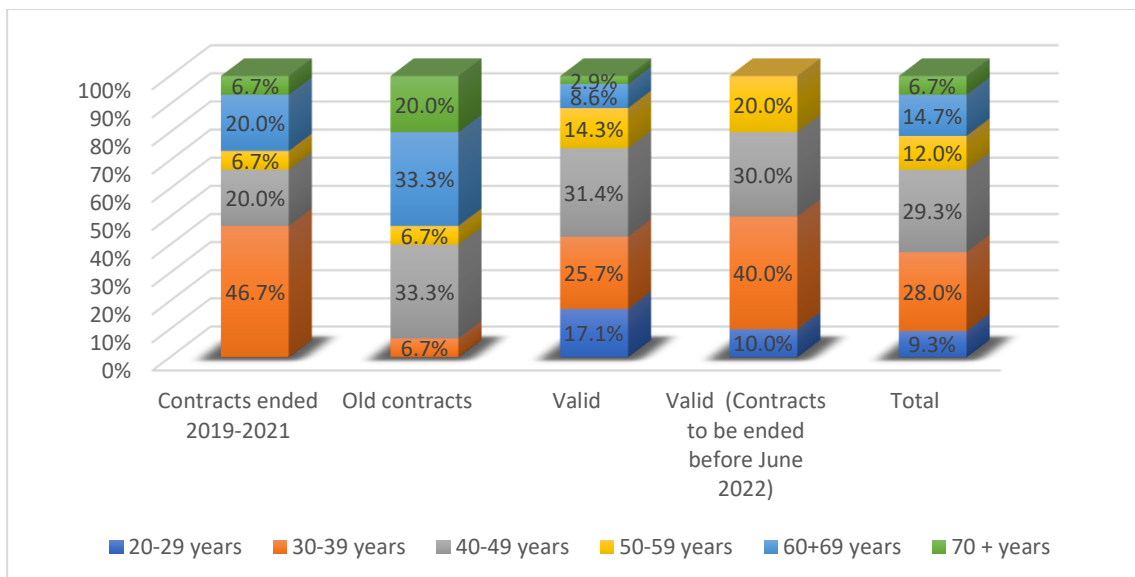


Figure 3-12: Percentage Distribution of PAPs by Age Categories and Type of Contract

3.3.2 Household Size

With regards to the household size of the PAPs, the average household comprises of 4.342 family members/ household. About 37.0% of the total surveyed sample reported : having a household composed of 4 persons (including the respondent). On the other hand, 20.5% of the surveyed sample have a household composed of 5 persons. 15.1% of the sample reported that the size of their household is limited to 3 persons.

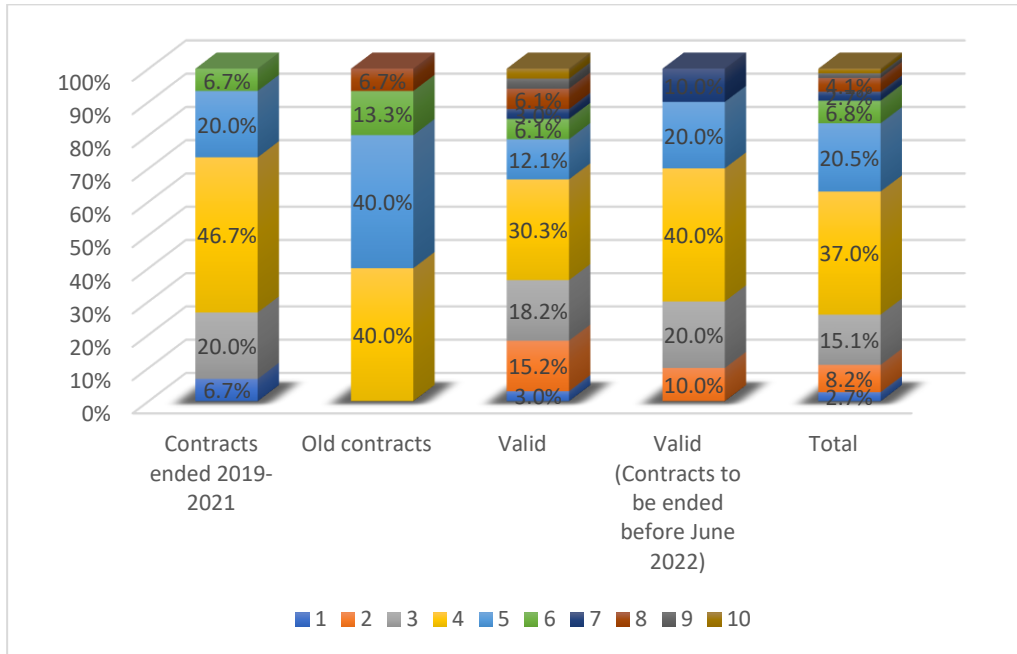


Figure 3-13: Percentage Distribution of PAPs by Total Number of Household Members

3.3.3 Educational Status

With regards to educational level of the affected people, the main two dominant levels of education are secondary vocational schooling (31.3%) and university education (30.1%). Alexandria governorate pays attention to education. However, there is still a significant number of those who have basic education, 9.6%, in addition to illiterate groups 4.1%. Gaining information about the level of education can support developing a particular communication method to people with limited education.

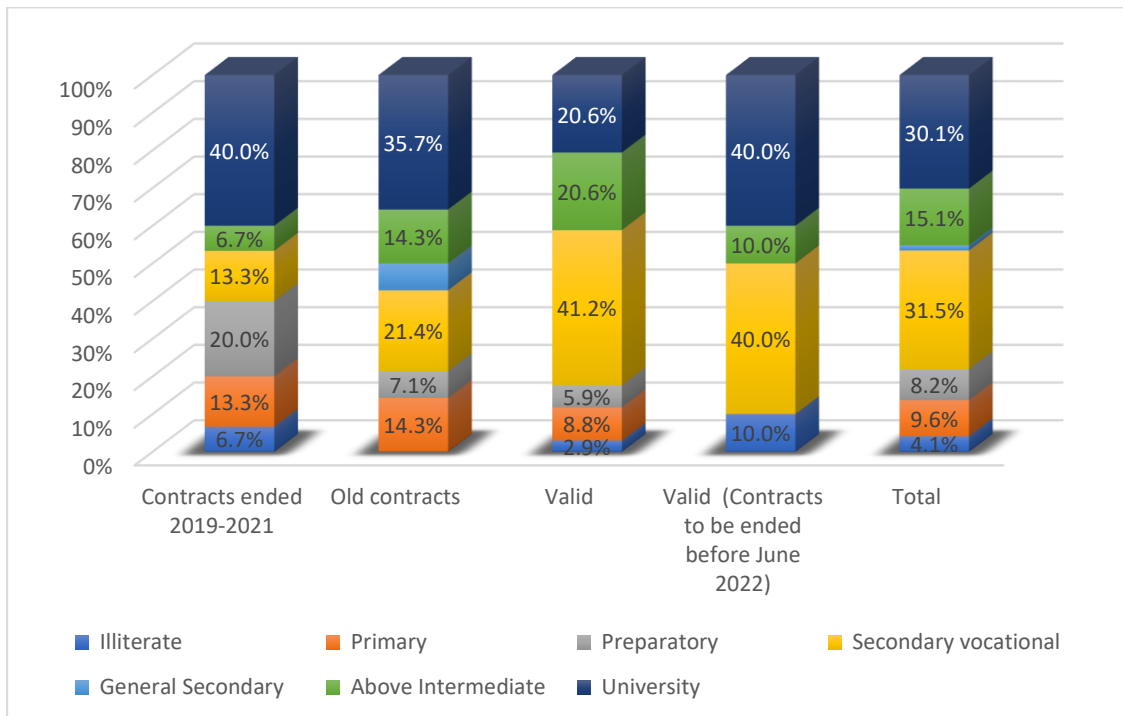


Figure 3-14: Percentage Distribution of PAPs by their Educational Level

3.3.4 Occupational Status

With regards to the occupational status of the surveyed sample, the majority of them (71.4%) work as sales people since they are the tenants of the shops and the business owners. Only 6.5% are accountants and few of them work as teachers beside being the tenants of shops and school principals which means that the shops are an extra activity that economically helps the tenants. It was obvious that the main profession is trading inside the tenants shops. It is worth mentioning that those who have alternative governmental occupation cannot lease the shops. Therefore, they lease the shops under their wives' name. Accordingly, a specific percentage of housewives was reported. However, the wives are not actually working or operating the shop.

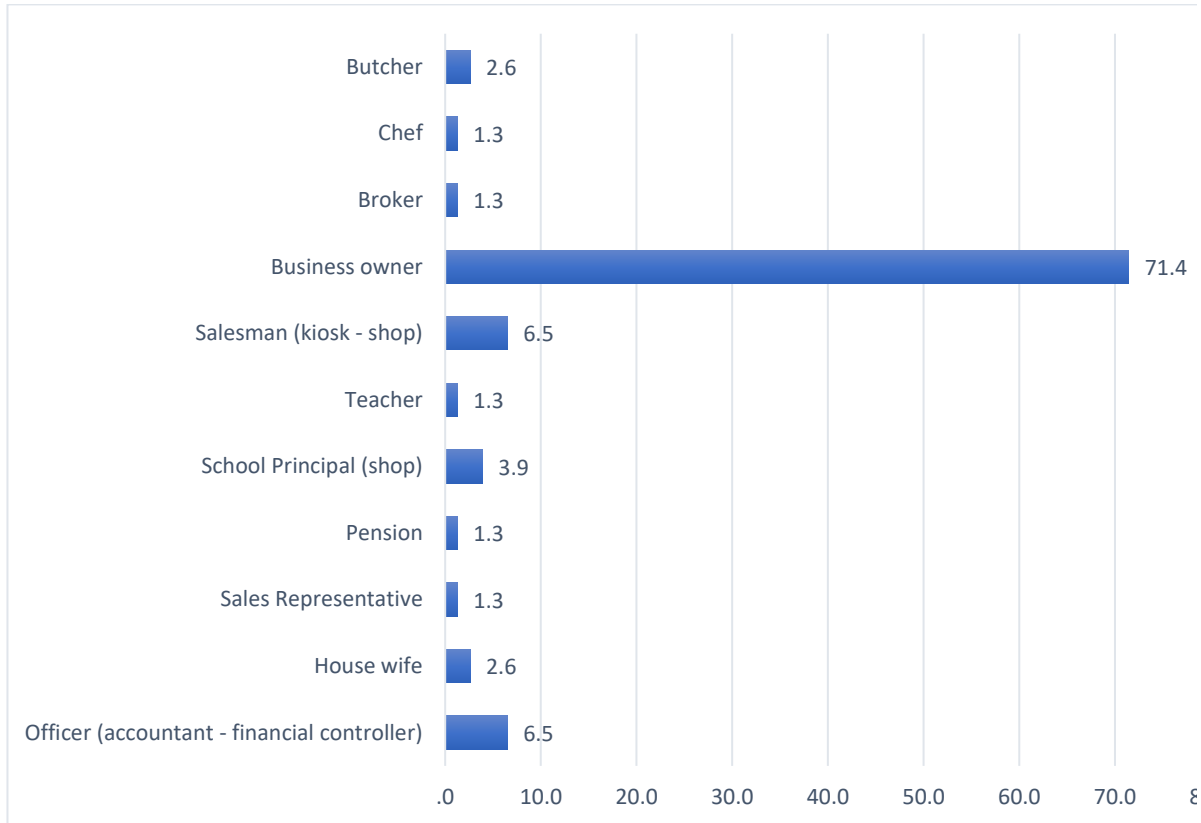


Figure 3-15: Percentage Distribution of PAPs by their Main Occupation

3.3.5 Economic Dependency and Monthly Revenue

The surveyed tenants reported that they support their family financially. About 90% of the surveyed tenants reported that they are the main family supporter (bread winner), while approximately 10% of the surveyed tenants reported that they partially support their family.

The study team exerted effort to identify the monthly revenue of each shop. However, the majority of PAPs preferred not to share this information, either due to being reluctant or not being aware of the exact amount as the tenants do not possess accurate financial records. Accordingly, indirect question was asked about the net revenue of similar business. The reluctance to respond to this question was limited to about 18.0%. This percentage represents tenants who refused to answer this question.

The collected data revealed that about 26.4% of the surveyed sample gain between 1,000-1,999 EGP net per month (accounting for the diversity of shop size and type). However, those who reported earning more than 5000 EGP were about 18.1%.

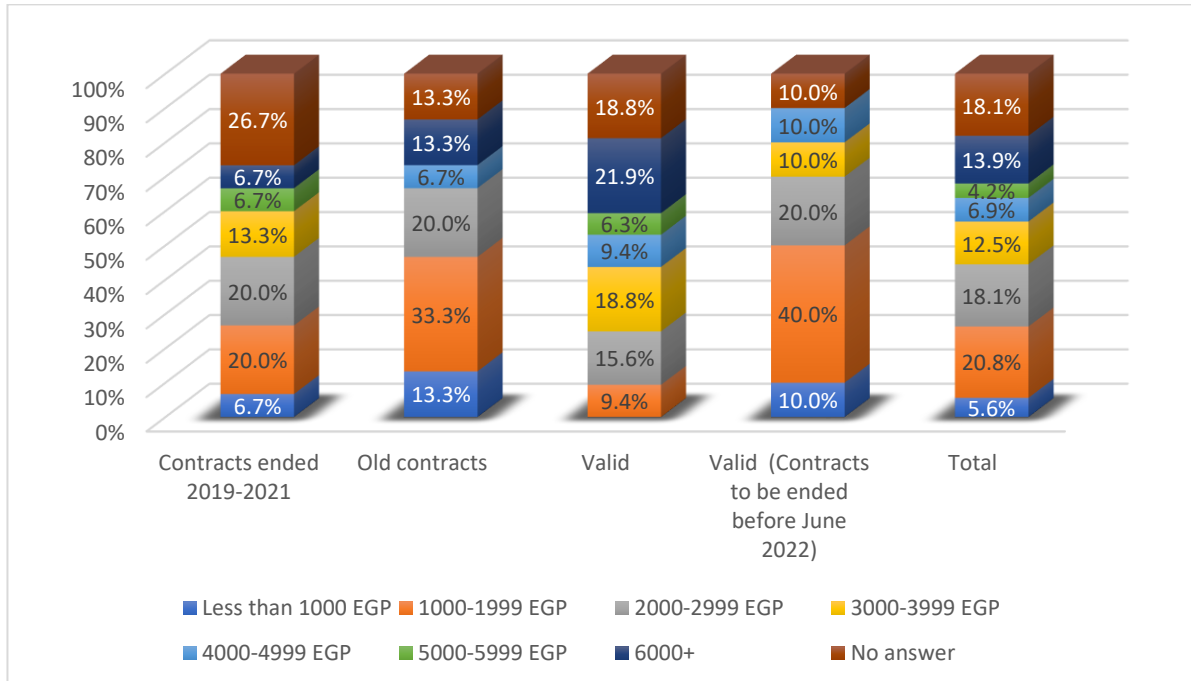


Figure 3-16: Percentage Distribution of Tenant PAPs by the Monthly Revenue of Similar Business

Being reluctant to talk about their income and the lack of accuracy about income related information as reported by most of studies published in Egypt, the team tried to figure out if any change in income took place during the previous year. About 75.0% of the surveyed tenants reported that their income decreased during the previous year due to COVID 19 and the absence of tourists. Additionally, the lock down minimized their revenue, particularly, for restaurants and cafés. However, 20.5% of the sample reported no change in income and only 1.4% reported an increase in their income.

Generally speaking they reported that their revenue decreased but they were unable to tell the percentage of decrease in income as they don't keep financial records. Additionally, the prices of supplies and goods they trade in increased. Accordingly, they managed to restore a portion of lost revenue.

They attributed the decrease in income due to the COVID-19 pandemic, particularly, during the curfew and decreased tourism in Alexandria during the summer season which imposed critical impacts on income.

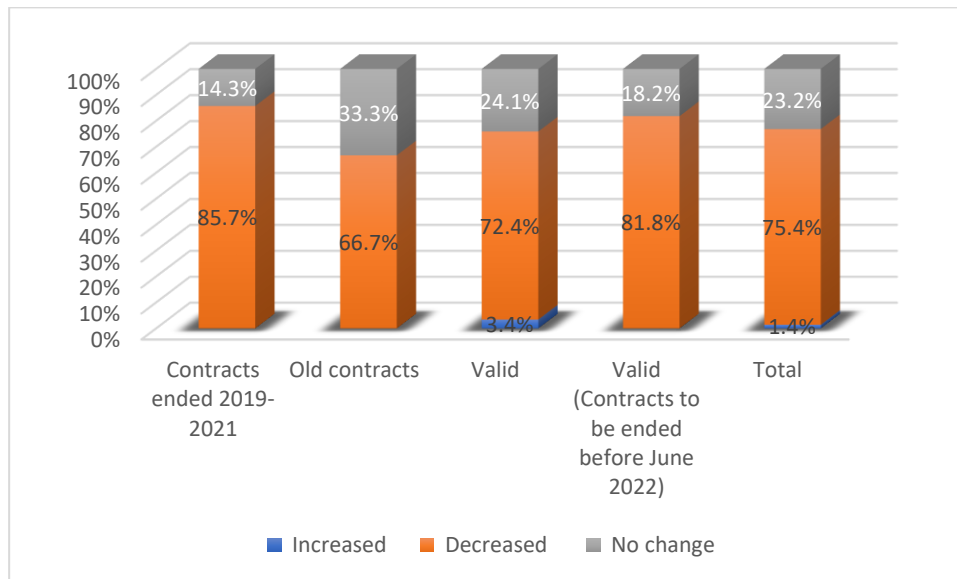


Figure 3-17: Percentage Distribution of PAPs by Change in Income during 2020-2021

3.3.6 Access to Electricity and Water Supply

The collected data revealed that 96.1% of the surveyed tenants have legal access to electricity. However, 3.9% reported having no legal access to electricity. The cost of electricity fees vary between 20 – 3000 EGP with an average of 700 EGP per month.

With regards to water supply, 20.5% of the surveyed sample reported that they have an official source of water supply inside their shops. However, 78.2% of them have no access to water supply. The fees of water supply is on average 250 EGP for each three months.

3.3.7 Monthly Shop Lease Value

Based on the data provided by the respondents and samples of contracts they shared with the study team and the contracts shared by APTA, the monthly lease is of changeable nature. The first year of contract has (X) value. The second year has (X +10%). The third year is of (X+20%). Therefore, any delay with the construction of the Raml Tram project may result in a significant change in the shop leasing value.

The collected data revealed that 25% of the surveyed sample pay less than 500 EGP. The second dominant value is between 1,000 -1,999 EGP (23.3%) of the surveyed tenants. About 19.0% of the surveyed sample pay more than 5,000 EGP. The average monthly lease for old leased shops is 326.8 EGP per month. However, for the newly signed contracts is 3,959.94

EGP. The total monthly cost of all rented shops reported by APTA was 262,258 EGP (16,811.4 US\$).

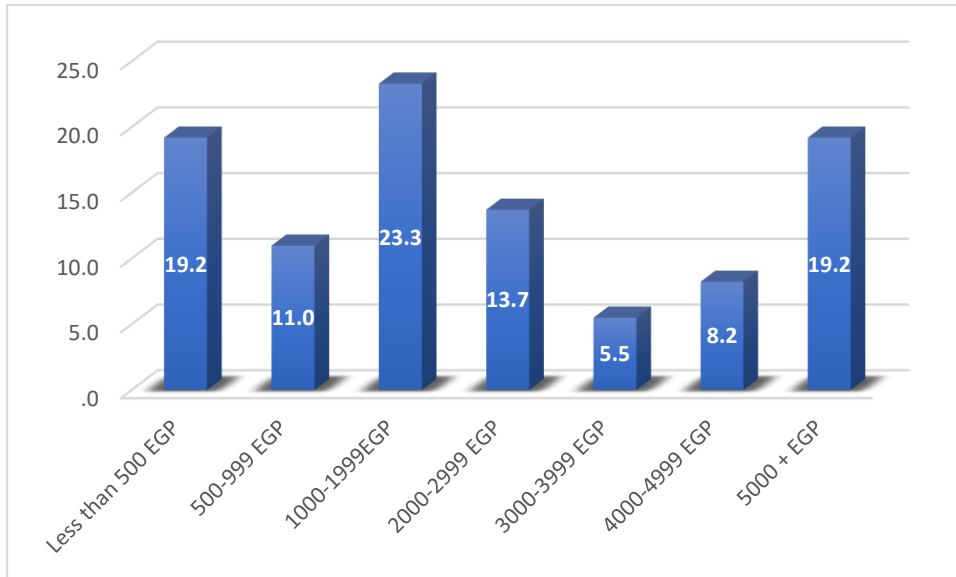


Figure 3-18: Percentage Distribution of PAPs by the Value of Monthly Lease

3.3.8 Availability of Tax Register and Commercial Register

Tax registers and Commercial registers in the process of compensation are tremendously important while assessing compensation, particularly the Tax register which is the basis for valuation of annual revenue. It was reported that 68.0% of the surveyed sample have a Tax register. However, 30.2% have no tax register. Small size shops whose contract period lasts less than one-year prefer not to have such official documents as they are not fully confident that their business will be successful. Accordingly, they have no tax register.

Regarding the commercial registry, 67.1% of the total number of tenants interviewed reported having the commercial registry. However, the majority of them did not show the registry to the surveying team.

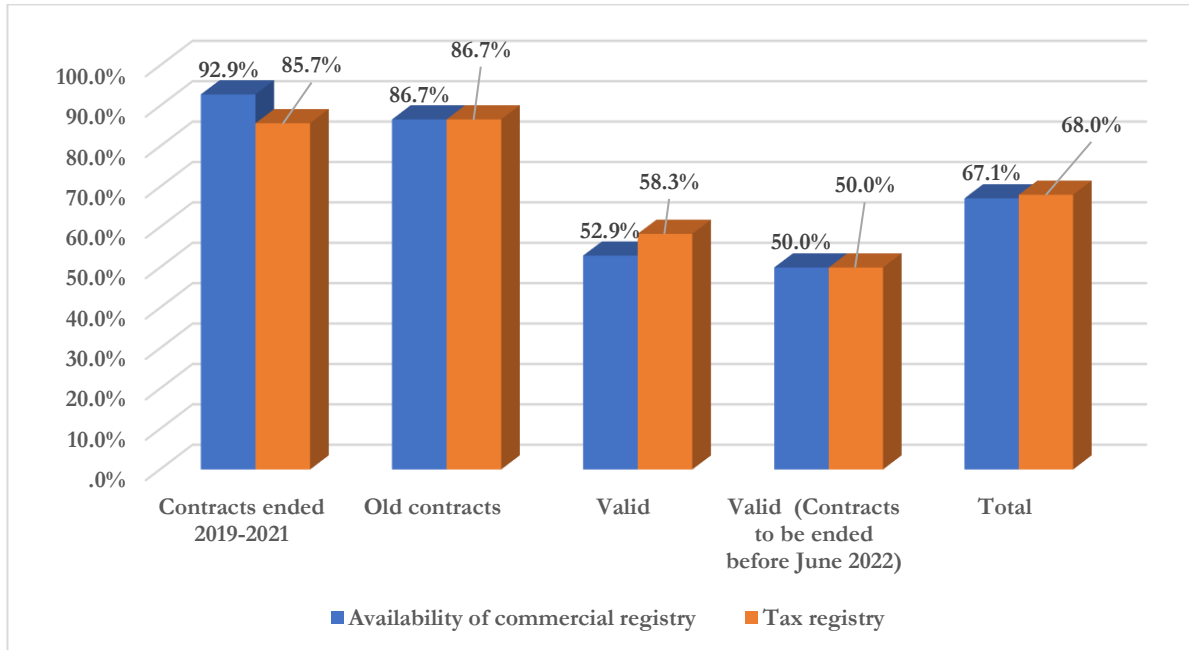


Figure 3-19: Percentage Distribution of PAPs by the Availability of Tax Register and Commercial Register

3.3.9 Health Burden

The discussion of health aspects attracted the attention of respondents to COVID 19. However, the study team asked about chronic diseases and health burden. About 20.0% of the tenants have health burden due to having at least one family member who has diabetes, blood pressure and respiratory problems.

The majority of surveyed tenants reported that health burden escalated due to the tremendous increase in the fees of physicians and other health providers after COVID 19. Therefore, they are obliged to benefit from governmental medical service providers which are relatively not of the same quality of private service.

3.4 Workers Socioeconomic Baseline

Workers of the shops and firms are one of the groups that will be affected as they might lose their source of income. The workers can be classified into the following categories:

- 1- Permanent workers
- 2- Casual workers
- 3- Seasonal and part time workers

4- Mosque workers

The total number of affected workers is about 148 person. There is no official census of workers to date. Additionally, their turnover rate is relatively high. Accordingly, after the development of the census, workers might not be the same who work at the shops now. Therefore, the Project consulted with 39 workers in October – November 2021. 94.9% of the surveyed workers are males versus only 5.1% female workers. The main findings of workers are presented in the section below. The consulted workers represent all types of workers. Special attention were given to the mosque workers as they are the most vulnerable category.

3.4.1 Workers’ Age categories

The distribution of workers sample by age category revealed that about three quarters of the sample are below 50 years old. However, 2.6% of the surveyed workers were above 60 years old. The figure below presents workers distribution by age category:

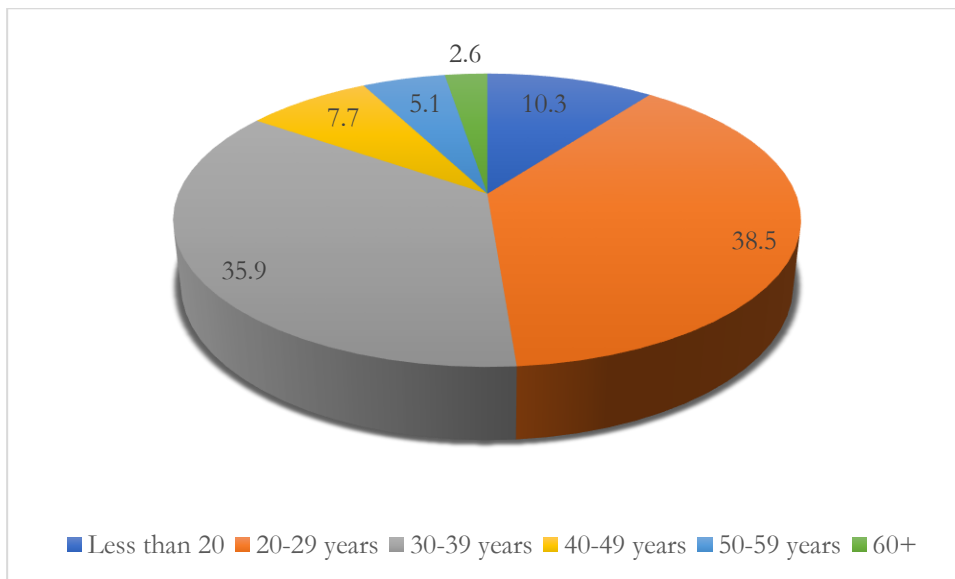


Figure 3-20: Distribution of workers sample by age category

3.4.2 Workers’ Educational Attainment

The consulted workers reported that they all have attended schools. 41.0% of the total surveyed workers have completed their university education. However, only 20.5% have completed their basic education. The figure below presents the workers’ sample distribution by educational level.

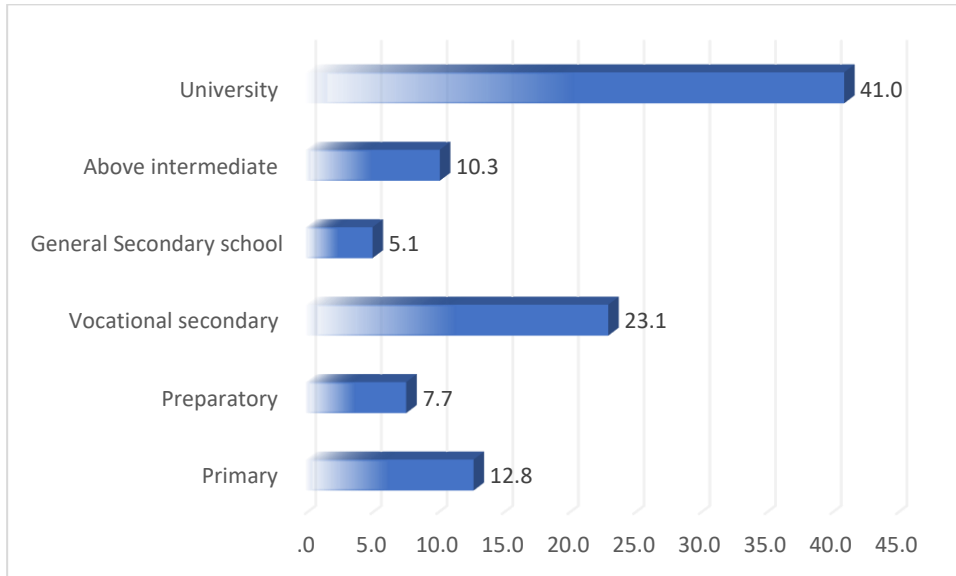


Figure 3-21: Distribution of workers sample by educational level

3.4.3 Workers' Employment Arrangement

About 60% of the consulted workers are recruited on permanent basis. However, the casual workers represent 35.9% of the sample. Aside from being a permanent worker, the majority of workers consulted have no contracts. Accordingly, no health or social insurance coverage of workers were found. The workers who have contracts are those working mainly with firms e.g. Al Akhbar foundation. The daily wage workers have the right to have unpaid days off and holidays. It is obvious that the working conditions are not in line with National Labor law No 12 of 2003.

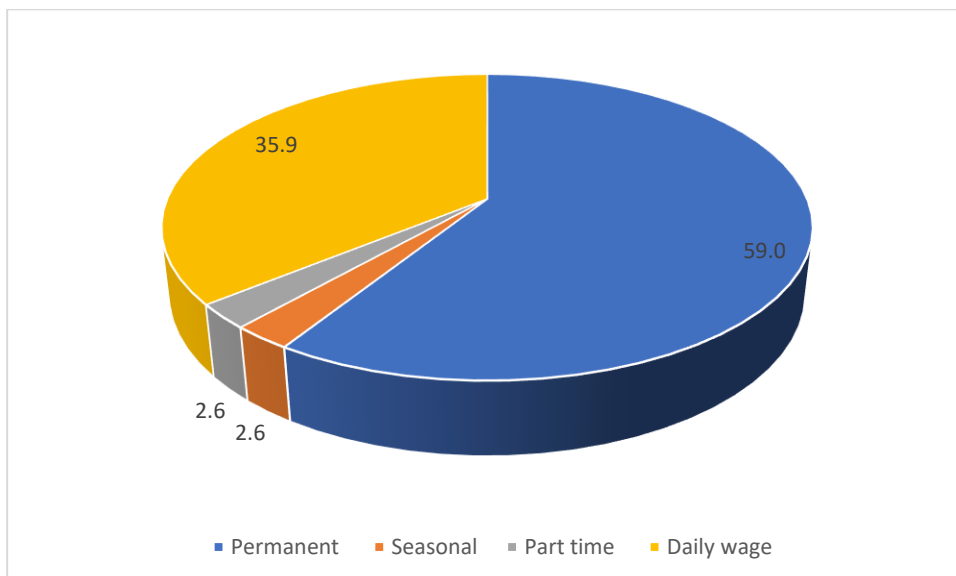


Figure 3-22: Distribution of workers sample by employment arrangements

3.4.4 Workers' Marital Status

With regards to marital status of workers, about 48.0% are divorced. However, the remaining workers have never been married. Accordingly, about half percent of workers still live with their parents. The majority of consulted workers support their family by spending more than half of their family on their household.

3.4.5 Workers' Insurance

Regarding the social insurance almost all workers have no social insurance coverage. About 95.0% of the workers reported that they have no social insurance. Aside from being permanent, seasonal, part time or casual workers, they all have no insurance.

Concerning the distance between their house and their work site, 69.2% of the surveyed workers reported that it took them less than one hour to reach their work site. However, 28.2% of them reported that it took them about 1-2 hours. The majority of them use microbus and tram to reach their working site as the tram does not extended to their residential areas.

The consulted workers were informed about the Tram rehabilitation project and its impacts on the shops. They recommended to avoid damaging the shops and the stations. They proposed to limit rehabilitation activities to the trams and the rails. However, after explaining the necessity to upgrade the stations, they reported that they will be obliged to search for alternative shops to work in. For the younger groups below 40 years, searching for a shop is not difficult. However, the old workers were concerned that they might have less opportunities than the younger groups.

3.4.6 Workers of Mosque

The workers of the mosque at Bakous station (4 people) are of vulnerable conditions as three of them are above 50 years old. They have been working in the mosque as cleaning laborers for more than 10 years. They have limited education and their capacity to be trained on other profession is not assured.

3.5 Mobile and Semi-mobile Street Vendors

Street vendors are classified into the following categories:

- 1- Semi-mobile vendors who have a stable hand cart/ table/ stalls – those have a fixed area to stay in and are mainly located close to the tram stations or the crossings of the tram.
- 2- Mobile vendors who have no fixed workplace – those are mainly moving from tram to another and between stations
- 3- Mobile Vendors who work inside the tram wagons

The study team managed to meet with eight of them in October -November 2021. Given their wide mobility, during each site visit new vendors have been noticed and the old ones were not available. Those who have semi-mobile nature were consulted with as they can be found during the implementation of the RAP.

The majority of street vendors are illiterate or barely completed their basic education. Their ability to adopt to the hard times is outstanding as they work under harsh and rigid circumstances. The discipline police force always prohibit them from standing in the streets as they affect the mobility of people and the traffic flow.

Street vendors age varies from 14 years to more than 60 years. The majority of consulted vendors are at the age category between 30 – 45 years. The average age is 39.75 years.

“Working as street vendors is the occupation that can be performed by any one, no skills are required, no capital sum of money, no permits required” as reported by one of the consulted vendors. The total family members of street vendors interviewed vary between 2 – 6 persons per each household with an average household size 3.88 person.

Street vendors are the sole supporter of their households. Their daily income varies according to many factors e.g. the season (winter- summer), feasts, holidays, rains ...etc. Accordingly, they were not able to tell about their average daily revenue. The average daily income of surveyed street vendors is about 151.25 EGP (9.7 US\$). Assuming that they work for 26 days per month, the total monthly income accounts to 3932.5 EGP. Accordingly, they are above poverty line (which is 3226 for households composed of 5 persons³⁰). The vendor is supported by one family member who works as well.

³⁰ Source: Egyptian Income, Expenditure and Consumption Study 2017-2018

They are not covered by any social protection (health insurance or social insurance). “***If we don’t work for one day we will not find food***” reported by one of the vendors. However, about half of the consulted groups pay attention to educating their children. The average number of children at school is about 1.75 child per each household.



Figure 3-23: Goods are put on a reed box



Figure 3-24: Women purchasing from green grocer (street vendor)



Figure 3-25: Male street vendor in Bakous station



Figure 3-26: Female street vendor in Bakous station

Street vendors face many problems as they have to deal with the police force who got accustomed to taking their goods and penalize the vendors as they illegally occupy the streets causing traffic and mobility problems to both cars and pedestrians. Additionally, other street vendors might compete to attract customers. The competition might escalate to quarrels and fight. Aside from that, the vendors have to deal with the bullies who must get paid to leave them working in specific areas of street.

Two of the consulted vendors reported that they receive financial support from one of the NGOs and the Ministry of Social Solidarity. However, the majority of vendors receive no support.

Regarding health burden, the majority of the surveyed vendors have no health burden. However, two of them have one of family members who have health problems.

The consulted vendors were informed about the Tram project and were asked to tell how they can restore their income. They replied “***We can move to alternative place or we can work close to the tram route***” Their response reflected the flexibility of vendors and their ability to survive under any difficult situations.

3.6 Homeless and Street Children

This category was one of the most difficult group of PAPs to meet as the homeless were facing mental disorder problems and the street beggars were reluctant to tell about their economic conditions. Accordingly, the Project surveying team relied on collecting indirect information about homeless category.

With regards to street children, the consultant managed to meet with two of them. However, the credibility and reliability of the information shared was questioned. Therefore, the Project surveying team consulted with the social solidarity directorate in order to gain better understanding of their conditions.

3.6.1 Homeless

Based on the discussion with social solidarity directorate, homeless are classified to the following categories:

- 1- Homeless with mental disability
- 2- Homeless people who have no accommodation
- 3- Homeless people who work as beggars and have alternative accommodation

The first and second category are the most vulnerable groups as they have no families or social arrangement that they can rely on. “***One of them is a wealthy person who was kicked out of his house by his own sons in order to take his apartment***” reported by the social solidarity directorate. The government provide shelter to this category in form of “Homeless without shelter program”.

The majority of this category are old men with no medical coverage. However, the NGOs and community people provide them with food and medicine.

Street beggars are of better conditions as they have a house and a family. The daily income from begging is estimated to be 150-250 EGP. They are not working only at the tram, they also work close to the coffee shops and restaurants along Alexandria Cornish. They claim that they are poor people with health burden. However, the consulted shops reported that the beggars earn lots of money, particularly, during summer season. With regards to having a

sort of a network or a bully who force homeless to beg, it was not reported to date by any consulted groups. It can be further investigated in the RAP.



Figure 3-27: Ministry of Social Solidarity support initiative to street children and homeless people



Figure 3-28: Street beggar

His face was covered by the Project surveying team to secure his right of not being exposed

3.6.2 Street children

Street children are classified into various categories as follows:

- 1- Street children with no alternative accommodation arrangement
- 2- Street children who have shelters or families
- 3- Street children engaged in illegal business (e.g. drug dealing)

Street children left their houses due to having separated parents. After divorce, the children cannot tolerate the mistreatment of the father/mother in law. Accordingly, they prefer to live in the street. After staying in the streets for a long time, they tend to form gangs and trade in drugs. Some of them might work as sex workers. The latest two categories need to be sent to correction department/ facility for youth. The majority of street children are young men below 15 years old.

They suffer from abuse and mistreatment by people, as well as the leaders of children who might exploit them. Their willingness to be sent back to their families is not assured. Accordingly, the social solidarity directorate gives them the right to choose whether to go back to their families, reside in a shelter, or stay in the streets. However, the children below 12 are not given the right to choose as they are too young to choose for themselves.

The consulted NGO (CARITAS) reported that street children have relatively wide mobility ability and they sleep at various areas (not necessarily the tram area). They escaped from their houses due to having quarrels with their parents and guardians. Additionally, they do not attend schools. They gain their income through begging, collecting recyclables and trading in

trivial goods. They earn their income from all over Alexandria City. The social solidarity directorate adopts many initiatives to support street children. Additionally, many NGOs provide them with shelter, food and health services.

3.7 Mosque in Bakous

Gafaar Ibn Aby Taleb NGO has established a mosque instead of shops owned by APTA. The lease contract was signed on the 1st of July 1984 for 6 months. The contract was automatically extended as the NGO is still paying the renting fees to date.

The NGO was established and disclosed in 1980 as per a statement of announcement number 724. The NGO provides a wide scope of services e.g. nursery and day care, orphans support, women financial aids...etc.

Regarding the mosque, it was established for praying purposes on an area of 424.36 meter square. It consists of two floors. The mosque, as being run by the NGO, has a standalone operation system. The Imam of the mosque is assigned and recruited by the Ministry of Endowment. However, the other workers (3 workers for cleaning) one part time maintenance worker and a person responsible for collecting medicine from people to be given free of charge to poor people. The mosque is supervised by 4 board members who work on voluntary basis. The mosque might collect charity donations (*Zakat*) from the community people to be sent to the NGO. Thereafter, the NGO provides financial support to the community people, particularly, poor women (divorced- widowed). These activities will not be interrupted as the NGO will continue collecting donations and providing financial support as usual from elsewhere. The monthly support given to women varies between 50 EGP- 100 EGP (3.21- 6.41 US\$). As a matter of fact, such amount of money is of no value to needy people. However, the NGO provides this donation based on a concept of ***“it is better than nothing”***. The donations were relatively reduced during the previous couples of years due to the quarantine and closure of mosques. Women are not allowed till now to pray inside the mosques based on the ministerial decrees.

The mosque consists of two floors; each floor has toilet and water facility. The construction materials are of fine quality, cement and concrete were used. Additionally, ventilation system is installed.



Figure 3-29: Mosque in Bakous station

3.8 Vulnerable Groups

Vulnerable groups are those who may suffer disproportionately from adverse resettlement impacts, such as the old, the young, the handicapped, the poor, isolated groups and single parents.

Based on this definition and the data collected from the project affected people the vulnerable groups are as follows:

- 1- **Female tenants:** They are the tenants who work for themselves and some of them are female- headed families. They will be vulnerable to the acquisition of their shops as it is relatively difficult for them to rent an alternative shop and prepare all paper works. Women ability to obtain all legal documents might be harder than men, particularly, if their spouse was the tenants
- 2- **Poor tenants who earn less than 2,000 EGP per month:** They are vulnerable due to their limited resources.
- 3- **Workers of the mosque:** they will lose their income totally and permanently. Their ability and readiness to be trained on other professions is extremely limited. Additionally, they are too old to find an alternative job.
- 4- **Old people:** They are those who are above 65 years-old with limited access to alternative sources of income (65 years is the age of pension for shop tenants). Additionally, some of the old workers have no other experiences and may lose their income.
- 5- **Street children:** Street children are vulnerable due to being unable to find proper shelter and being abused by the community people and their older peers. However,

their mobility and ability to adopt to remedial approaches is relatively high. On the other hand, they accept working in any job e.g. loading and unloading trucks, tuk tuk drivers, waste pickers and waste scavengers.

- 6- **Homeless people:** Those who are mentally disabled and those who have no shelter are of the most vulnerable conditions as they have limited resources and cannot withstand any minor changes in their living conditions.

4. PROJECT ADVERSE IMPACTS

NAT has confirmed that all efforts will be made to avoid any road closures and that access to local shops and businesses outside the stations and RoW will be guaranteed during construction. It is therefore assumed these businesses will not experience any loss of access resulting in temporary loss of income. Nevertheless this RPF sets out to provide a framework approach that will cover all potential scenarios, including the unlikely event of unforeseen changes to the construction designs that may result in potential temporary impacts to local shops and businesses outside the stations and RoW. As such the following sections of this RPF outline the compensation approach for both potential temporary impacts, should such impacts occur, and for permanent impacts.

This section will shed light on both impacts:

4.1 Potential Temporary Economic Displacement (Construction Phase)

4.1.1 Overview

As stated previously in Section 3, some livelihood activities may potentially be temporarily impacted as a result of the temporary acquisition of land rights for the construction phase of the Project which should last approximately 24 months.

Each potential temporary impact is described below. The number of PAPs affected temporarily during construction, if any, will be determined at a later stage when more detailed Project design becomes available. It should also be noted that the Contractor will be required to develop Construction Disturbance Management Plans closer to the start of construction to ensure that socioeconomic impacts resulting from Project construction, including any disruption of access to shops, are avoided or reduced to the minimum.

4.1.2 Impacts on Shops Tenants and Workers

While considered unlikely since Project design and Disturbance Management Plans will be in place to mitigate this impact, shops may potentially experience complete loss of access due to construction works, which may result in total closure of the affected businesses and loss of income for shop owners, tenants, and workers. In some cases, shops may experience partial loss of access and reduced customer traffic (as opposed to complete loss of access) which may also result in loss of income. Complete loss of access and resulting closure of shops, if any, will be considered and addressed as part of the RAP, while reduced customer traffic in relation to construction works will be addressed by NAT through a separate procedure which

foresees compensation on an ad-hoc and case-by-case basis according to the measures identified in the Construction Disturbance Management Plans that will be developed by the Contractor's Social Team and in line with Egyptian standards (see detailed approach in Section 5.2).

4.1.3 Impacts on Mobile and Semi-mobile Street Vendors

Based on meetings with street vendors, APTA , and social solidarity directorate carried out in October and November 2021, as well as, site visits to study area of influence, and considering similar projects carried out by NAT recently, it is understood that itinerant vendors working inside the tram and in the crossings will use the fence of the construction site to present and trade in their goods. Additionally, they sell their goods to construction workers. Accordingly, the impacts tend to be of positive nature on the itinerant vendors during the construction phase. The photos below shed light on the street vendors in Raml Tram. Additionally, the photos illustrate where the vendors stood in similar project implemented by NAT.

Nevertheless, the establishment of fences along the RoW may also limit available spaces along the RoW and, as such, street vendors trending inside the RoW, if any, may be required to relocate during the construction phase, which may result in temporary loss of income for those affected. This is especially the case for vendors along the RoW compared to those at the stations, and for those occupying the side streets right outside the fenced areas close to some of the stations (e.g. Victoria) as these may also experience some access restrictions and may have to relocate.



Figure 4-1: Shoes polisher in Bolkly station



Figure 4-2: Fixed street vendor



Figure 4-3: Street vendors standing by the fence of Metro line three phase three in Cairo

4.1.4 Impacts on Transport Operators

Transport operators including tuk-tuks, minibuses, and buses operating along the RoW are not expected to experience any adverse impacts during construction unless the street crossings where they operate are closed or inaccessible during construction. In fact, discussions with APTA, tuk tuk and microbus drivers, and road authorities highlighted that transport operators may actually benefit from tram closed during construction as these will be transporting those who got accustomed to using the tram. Despite, the traffic impacts related to the construction activities, other means of transportation will be able to transport Tram Raml beneficiaries, particularly as the traffic impacts will be managed through proper traffic management plan. The consulted drivers of tuk tuks and minibuses reported that they will not be affected by the project construction in case that the street crossings remain open. In case of closing of streets, they should be informed prior to any closure of streets.

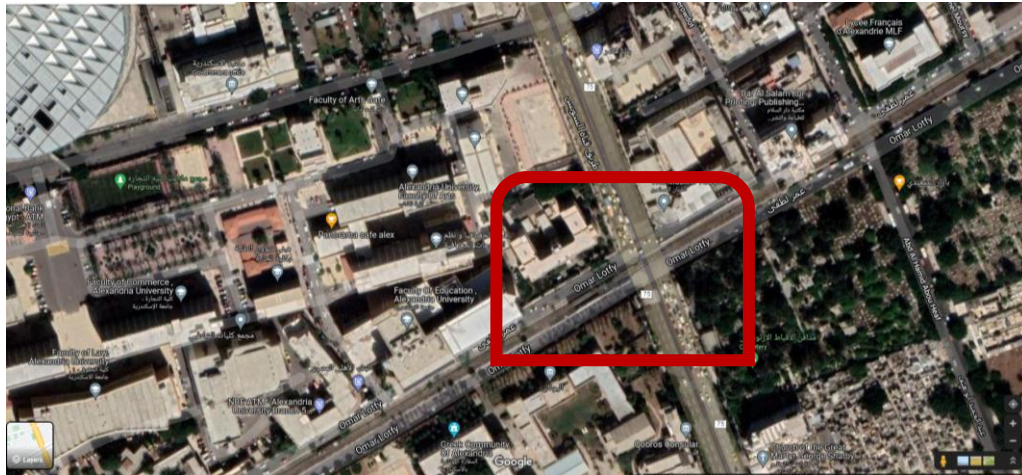


Figure 4-4: Sample of street crossing close to El Shoban El Moslemein

4.2 Permanent Displacement (Construction and Operation Phase)

4.2.1 Overview

Raml Tram project will result in various adverse impacts related to permanent land acquisition and livelihood impacts.

| Affected assets | Total number of affected assets | Duration | Owners of assets | Current use of assets |
|--|-------------------------------------|-----------|---|--|
| Assets | | | | |
| Shops/kiosks/ shop used as open garden/toilet used by men/ mosque established instead of shops | 117 (only 91 of them are operating) | Permanent | APTA (owner of the shops) | The affected shops are used for commercial activities. The mosque is used for praying purposes only. |
| An informal small mosque established at the station | 1 | Permanent | Private illegal structure that is not owned by anyone . The mosque was constructed by collecting donations from the community people. No one claimed the ownership of the mosque. | The mosque is used for praying only. |

4.2.2 Shops Tenants and Labourers

The Alexandria Raml Tram Rehabilitation Project will have a permanent adverse impact on livelihood of the tenants of shops in the Raml tram stations located along the route of the Tram (14.4 km). The total number of affected assets after avoiding the shops located outside of the right of way is **117** shops, one restaurant, a shop that is used as a male public toilet, and a small mosque located at the stations of the tram. The 117 assets are owned by APTA and leased to tenants (individuals – firms). The total number of leased shops, restaurants...etc is limited to **(91)** asset. Accordingly, **26** shops will be excluded as **24** of them are closed and **2** of them are used by APTA (rest area for cleaning workers and a supermarket). Additionally, **12** shops are located outside the right of way. A full list of tenants provided by APTA in August 2021 is in (Annex 1)

All shops (including kiosks, toilet, restaurants, etc) will be demolished during the construction phase. NAT has not made any decision related to the reconstruction of shops to date. Accordingly, the tenants can't be accommodated in the new shops during operation. Additionally, there is a probability to have a private operator of the shops that will have the full right to determine who can lease the new shops. The end result is that the new shops can't be made available to the current tenants at this stage.

The shops are used for different purposes e.g. trading in candy, cigarettes, juice, selling books, etc. Below is the distribution of affected shops by station of the tram and type of shop usage.

Table 4-1: Project Affected Assets segregated by Tram Station

| Station | Number of Shops | Percent |
|--------------------|-----------------|---------|
| Abrahemia | 4 | 4.4 |
| El Seyouf | 1 | 1.1 |
| Shatby | 1 | 1.1 |
| El Qaed Ibraheim | 4 | 4.4 |
| Backus | 22 | 24.2 |
| Bolkly | 6 | 6.6 |
| Roshdy | 7 | 7.7 |
| San Stefano | 8 | 8.8 |
| Sporting El Kobra | 3 | 3.3 |
| Sidi Bishr | 9 | 9.9 |
| Sidi Jaber Sheikh | 1 | 1.1 |
| Sidi Jaber Station | 3 | 3.3 |
| Shots | 2 | 2.2 |
| Sefr | 1 | 1.1 |

| Station | Number of Shops | Percent |
|--------------------|-----------------|--------------|
| Victoria | 5 | 5.5 |
| Camp Shezar | 3 | 3.3 |
| Cleopatra Hammamet | 5 | 5.5 |
| Laurent | 1 | 1.1 |
| Raml station | 4 | 4.4 |
| Mustafa Kamel | 1 | 1.1 |
| Total | 91 | 100.0 |

Source : APTA shared information August 2021



Figure 4-5: Kiosk in Roushdy station



Figure 4-6: Shop in Bakous station



Figure 4-7: a shop used as a garden in Bakous station



Figure 4-8: A mosque in Bakous (built instead of shops)



Figure 4-9: Small informal shop in Victoria



Figure 4-10: A shop used as toilet facility in Victoria

A full list of all affected assets photos is included in Annex 3 segregated by station and asset.

Table 4-2: Project Affected Assets segregated by type of activity

| Station | Type of shop | | | | Total |
|------------------|--------------|-------|-----------------------|--------|-------|
| | Shop | Kiosk | Shop used as a garden | Mosque | |
| Abrahemia | 4 | 0 | 0 | 0 | 4 |
| El Seyouf | 0 | 1 | 0 | 0 | 1 |
| Shatby | 1 | 0 | 0 | 0 | 1 |
| El Qaed Ibraheim | 4 | 0 | 0 | 0 | 4 |
| Backus | 20 | 0 | 1 | 1 | 22 |
| Bolkly | 6 | 0 | 0 | 0 | 6 |
| Roshdy | 5 | 2 | 0 | 0 | 7 |
| San Stefano | 6 | 2 | 0 | 0 | 8 |

The Alexandria Raml Tram
Rehabilitation Project



| Station | Type of shop | | | | Total |
|--------------------|--------------|-------|-----------------------|--------|-------|
| | Shop | Kiosk | Shop used as a garden | Mosque | |
| Sporting El Kobra | 3 | 0 | 0 | 0 | 3 |
| Sidi Bishr | 9 | 0 | 0 | 0 | 9 |
| Sidi Jaber Sheikh | 1 | 0 | 0 | 0 | 1 |
| Sidi Jaber Station | 3 | 0 | 0 | 0 | 3 |
| Shots | 2 | 0 | 0 | 0 | 2 |
| Sefr | 1 | 0 | 0 | 0 | 1 |
| Victoria | 5 | 0 | 0 | 0 | 5 |
| Camp Shezar | 3 | 0 | 0 | 0 | 3 |
| Cleopatra Hammamet | 5 | 0 | 0 | 0 | 5 |
| Laurent | 0 | 1 | 0 | 0 | 1 |
| El Raml station | 2 | 2 | 0 | 0 | 4 |
| Mustafa Kamel | 1 | 0 | 0 | 0 | 1 |
| | 81 | 8 | 1 | 1 | 91 |

Source : APTA shared information August 2021

In addition to the shop tenants (91), there are sales persons who work inside the shops. The exact number of sales persons is not identified as about 60% of them are daily wage workers. However, based on the consultation activities carried out with the tenants of shops reflected that workers number 148 as of November 2021. The majority of workers are males with no fixed contracts.

The total area of affected shops varies. About 48.7% of the shops have a footprint of 5 to 9 square meters. On the other hand, about 16.7% of the shops less than 5 square meters. As well, 14.1% of the shops have a larger footprint which exceeds 30 square meters. This is an indication that there will be a significant variation based on the shop footprint. Eight shops are small kiosks. The table below indicates the distribution of shops by the total footprint of the shop and station.

Table 4-3: Percentage Distribution of distribution of shops by the total footprint of shop and station in square meter

| Station | Footprint of the shop | | | | | |
|--------------------|----------------------------|--------------------|----------------------|----------------------|----------------------|--------------------|
| | Less than 5 m ² | 5-9 m ² | 10-14 m ² | 15-19 m ² | 25-29 m ² | 30+ m ² |
| Ibrahemya | 25.0% | 50.0% | | | | 25.0% |
| El Seyouf | 100.0% | | | | | |
| El Qaed Ibraheim | | | 100.0 % | | | |
| Bakous | 5.9% | 11.8% | 11.8% | 17.6% | 5.9% | 47.1% |
| Bolkly | | 66.7% | 16.7% | 16.7% | | |
| Roushdy | 14.3% | 57.1% | 28.6% | | | |
| San Stefano | | 42.9% | 14.3% | 14.3% | | 28.6% |
| Sporting El Kobra | | 100.0% | | | | |
| Sidi Bishr | | 100.0% | | | | |
| Sidi Jaber Sheikh | | 100.0% | | | | |
| Sidi Jaber Station | 66.7% | 33.3% | | | | |
| Shots | 100.0% | | | | | |
| Victoria | | 100.0% | | | | |
| Camp Shezar | 66.7% | 33.3% | | | | |
| Cleopatra Hamamat | | 100.0% | | | | |
| Laurent | 100.0% | | | | | |
| El Raml station | 50.0% | 25.0% | 25.0% | | | |
| Mustafa Kamel | | 100.0% | | | | |
| Total | 16.7% | 48.7% | 12.8% | 6.4% | 1.3% | 14.1% |

4.2.3 Mosques

Based on the final consultation activities carried out in October -November 2021, two mosques will be affected by Raml Tram activities.

The first mosque (Mohamed Abd El Wahab mosque) is owned by APTA and was leased by an NGO (Gafar Ben Aby Taleb). The total footprint of the mosque is 424.36 square meters. The mosque is run under the auspices of the Ministry of Endowment. The Ministry assigned and Imam to be responsible for the rituals. However, the NGO renovated the mosque and assigned a board and workers to be responsible for cleaning and the maintenance of the mosque. The mosque was leased in 1984 for a period of 6 months. However, the NGO continued being the rent to date. It is worth mentioning that the NGO is not located inside the

mosque. They have a headquarter located at Hagar El Nawateia neighbourhood (please see Annex 20). The figures below are presenting the first big mosque.



Figure 4-11: Big mosque that was constructed instead of shops owned by APTA (first mosque)



Figure 4-12: The mosque from outside (first mosque)

The second mosque was built at the pavement of Victoria station. No one of the community claims any right of the mosque and no one is working there. However, the users of the tram pray inside the small mosque. The total footprint of this mosque is limited to about 6-meter square. It was built with poor construction materials.

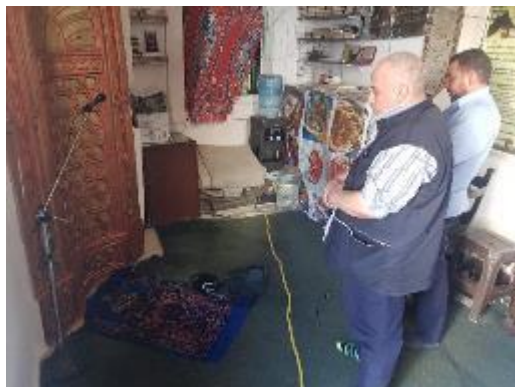


Figure 4-13: Small informal mosque in Victoria (second mosque)



Figure 4-14: The small mosque from outside (second mosque)

4.2.4 Street Children and Homeless People

The project will cause loss of shelter of street children (about 10) and the homeless people (about 8). The homeless and street children sleep in some stations. Accordingly, they will lose their shelters. Therefore, NAT got in contact with the social solidarity directorate in Alexandria Governorate on the 27th of September 2021 in order to accommodate street children and

homeless people. Additionally, a meeting was carried out with the Ministry of social solidarity aiming at discussing the homeless and street children.

Homeless people are classified as follows:

- 1- People with mental disability and those who have no place to live in
- 2- Street beggars who have houses
- 3- Drug dealers who act like homeless (under cover and they have their houses)
- 4- Procurer (he facilitates sex working)
- 5- Bullies and criminals

Each category will be managed by the social solidarity differently as discussed in the Minutes of meeting attached in Annex 5.



Figure 4-15: Street children in Sidi Gaber station



Figure 4-16: Homeless person in Raml station

4.2.5 Impacts on Other Means of Transportation

The Raml tram project is not anticipated to adversely affect the operators and owners of other means of transportation e.g. tuk tuk, minibuses and buses. The discussion of impacts on the operators of means of transportations with APTA, drivers of tuk tuks and minibuses and road authority reflected the following:

- **During operation phase:**

The Raml Tram has a specific route that does not serve all passengers of Alexandria. Accordingly, the customers of buses, minibuses and tuk tuk are not anticipated to rely on Raml Tram. Additionally, the coverage areas of tuk tuks, minibuses and buses are much wider than the Tram. As a matter of fact, the tuk

The Alexandria Raml Tram Rehabilitation Project



tuk and minibuses might also benefit from transporting people to the Tram, particularly, if the Tram service is enhanced.

5. ELIGIBILITY, ENTITLEMENT AND CUT-OFF DATE

5.1 Cut-Off Date

The preliminary cut-off date was initially disclosed by NAT as the 31st of December 2020. It was disclosed to all entities and stakeholders in a meeting carried out with the Alexandria Governor on the 19th of January 2021. However, and due to the absence of the Public Interest Decree, this cut-off date was not legally accepted by APTA as NAT has no official right of the Tram route lands yet. Accordingly, after issuing the Public Interest Decree on the 22nd of December 2021, NAT, in cooperation with the compensation committee, will carry out the final census of all affected categories and disclose the cut-off date accordingly. The disclosure of the cut-off date is the basis of eligibility for compensation. Accordingly, the RAP will report the cut-off date.

This cut off date will be applicable to the tenants of shops, mosque and restaurants. However, the workers cut off date will be after carrying out the census of workers which will be about two-three months prior to eviction date.

Regarding the temporary impacts on shops that may potentially experience complete loss of access during construction, a cut off date will not be established as these impacts may happen at any time during construction. Temporary impacts on shops, if any, will be identified prior to the start of construction and any affected tenants or shop owners will be entitled to compensation and remedial action as determined in the RAP entitlement matrix in case of significant loss of livelihood.

All vendors and street children located along the route will not be subject to the cut off date as their numbers is changeable and their mobility is regarded as high. Accordingly, any vendors and homeless people (children – adult) will be entitled for remedial actions.

5.2 Eligibility

The eligibility process defines who and what is eligible for compensation, and equally who and what is not. “Who” refers to those persons, households or communities that experience displacement impacts both temporary (if any) and permanent. “What” refers to the types of immovable assets that will be impacted.

The Project considers all people with legal or illegal title are eligible for remedial actions. As described previously in Section 4.1, two categories of potential temporary access impacts

have been identified: i) total loss of access to shops; and ii) partial loss of access and reduced customer traffic. The latter is not considered in the scope of the RAP and will be addressed separately as a construction impact.

As previously stated in Section 4, NAT has confirmed that access to local shops and businesses outside the stations and RoW is guaranteed during construction and therefore it is assumed these shops will not experience total loss of access resulting in business closure, However if this occurs, shop owners, tenants, and workers will be eligible for compensation or remedial action as determined in the RAP entitlements matrix (see Section 5.3). Their names will be determined after the contractor final design and the construction plan.

In case of unforeseen changes to construction design resulting in loss of income due to reduced customer traffic as a result of reduced access or partial loss of access, owners, tenants, and workers of affected shops will not be eligible for compensation or remedial action under the RAP, but rather, they will be compensated through a separate procedure which foresees compensation on an ad-hoc and case-by-case basis according to the measures identified in the Construction Disturbance Management Plans that will be developed by the Contractor's Social Team and in line with Egyptian standards. These plans will take into account engagement with and feedback from local communities and will integrate mitigation measures to avoid/minimise potential socio-economic impacts resulting from construction.

Additionally, all tenants who lease the shops from APTA are eligible for compensation and livelihood restoration support. APTA shared a full list of all tenants in August 2021. In addition to this list of tenants, additional PAPs were defined, however, they were not included in the list.

In full compliance with EIB Standard 6 and WB ESS5, the Project understands that legitimate interest is not synonymous with ownership, but rather encompasses displaced people, households and communities who:

- Have formal legal right to the land or assets they occupy or use: this category is mainly those who have valid lease contract with APTA.
- Do not have formal legal rights to land or assets they occupy or use, but have a claim to land that is recognized or recognizable under national law: this category is those people who have their contract ended and still occupy the shops.

The Alexandria Raml Tram
Rehabilitation Project



Additionally, those tenants who sub-lease the shop from the original tenants from APTA.

- Who have no recognizable legal right or claim to the land or assets they occupy or use. This category was not seen within the PAPs.

Table 5-1: Summary of the Project Affected People (Permanent and Temporary displacement)

| Category | Subcategory | Total number of affected groups | Comments |
|--|--|-----------------------------------|--|
| I. Tenants of shops and Kiosks in stations owned by APTA | I1- Tenants of shop/Kiosk with contract ending before June 2022 ³¹ | 12 | The owners of assets and lands are APTA and Alexandria Governorate that will lose access to income source permanently. |
| | I2- Tenants of Shops/ kiosks with valid contract after June 2022 | 43 | |
| | I.3: Tenants of APTA shop/Kiosk with contracts that ended before 2014 but continued to pay low rents | 20 | |
| | I.4: Tenants with contracts ended from 2015 to 2021 | 16 | |
| | I.5 : Sub-tenants | 2 | |
| | Sub-Total | 91 tenants + 2 sub-tenants | |
| II. Individuals engaged in labour in stations shops | II.1: Individuals with formal permanent contract with governmental enterprises (e.g. United Republic Newspaper Distribution Company, El Akhbar Foundation Dar Al Hilal Foundation) | TBD after the census | The casual workers are those who work on daily basis at cafés and restaurants. |
| | II.2: Individuals with formal permanent contract with the shops' tenants | TBD after the census | |
| | II.3: Individuals with informal contracts with shop tenants | TBD after the census | |
| | II.4 Individuals engaged in casual work (e.g. waiters in restaurants and cafés) | TBD after the census | |

³¹ These two categories have been defined because NAT suggested that those whose contract would expire before start of construction should not be entitled to compensation. Since the standard practice is for tenants whose contracts expire to continue paying rent until the new tenant is identified it was considered appropriate to include these tenants as eligible for compensation regardless of contract expire date.

The Alexandria Raml Tram
Rehabilitation Project



| Category | Subcategory | Total number of affected groups | Comments |
|---|---|---|--|
| | II.5 Workers of the tram who are working in the Raml Tram now and are permanently recruited by APTA (governmental entity) ³² | 200 | |
| | II.6 Workers of the mosque (Gafaar Ibn Aby Taleb NGO) | 4 full time + 1 part time were recruited by the NGO ³³ and one Imam was recruited by the Ministry of Endowment | |
| | Sub-Total | Estimated 148 workers in the shops and mosque / APTA workers is 200 | Labourers (tentative number to be updated 3 months before displacement) |
| III. Informal mobile and semi-mobile street vendors along the RoW and near stations | III 1: Semi-mobile Vendors who have a stable hand cart/ table/ stalls along the RoW and near stations | No estimates available (10 business around stations) | During various site visits, the number of vendors was not the same as the vendors did not have fixed site. Estimated numbers do not include PAPs found along the RoW. These numbers will be updated closer to the construction start date. |
| | III 2: Mobile Vendors who have no fixed workplace | Estimated 20-30 | |
| | III 3: Mobile Vendors who work inside the tram wagons | Estimated 15-25 | |
| | Sub-Total | No up to date estimates available | These numbers will be updated closer to the construction start date. |
| IV. Street Children | IV 1: Street children with no alternative accommodation arrangement | To be defined during the census | Number of street children was not the same in each site visit. |
| | IV 2: Street children who have shelters or families | To be defined during the census | |
| | IV 3: Street children engaged in illegal business (e.g. drug dealing) | To be defined during the census | |
| | Sub-Total | 10 children (estimated based on field observation) | |

³² These are governmental staff recruited by APTA on permanent based contract.

³³ The NGO is not operating inside the mosque as the headquarter of the NGO is located in Bakous neighbourhood

The Alexandria Raml Tram
Rehabilitation Project



| Category | Subcategory | Total number of affected groups | Comments |
|---|---|--|---|
| V. Homeless and beggars | V 1: Homeless people with mental disability | To be defined during the census | Homeless number changed 4 times based on the date of site visit. |
| | V 2: Homeless people who have no accommodation | To be defined during the census | |
| | V 3: Homeless people who work as beggars and have alternative accommodation | To be defined during the census | |
| | Sub-Total | 8 people (estimated based on field observation) | |
| VI. Tenants of Shops and Kiosks owned by APTA (same as Cat. I) and who have planted trees ³⁴ | VI.1 Shop tenant who planted trees (in the garden or in the vicinity of shop) | 1 ³⁵ | One shop tenant leased a shop and used it to plant trees and make it an open area |
| VII. Religious Structures | VII.1 Mosques | 2 | One big mosque is being operated by an NGO. Another very small mosque was built on the station by community people. |
| | Sub-total | 3 | |
| VIII. Users of mosques, shops, transportation services, and garden | VIII.1 Users of the mosques | No estimates available | Users of the mosques will be slightly affected by the absence of the mosque as there are many alternative mosques within the area of influence. |

³⁴ It has been decided to present the loss of the garden as a separate category of losses but these are tenants that have been recorded under Category I above.

³⁵ Already accounted for under Category I.

The Alexandria Raml Tram
Rehabilitation Project



| Category | Subcategory | Total number of affected groups | Comments |
|--|---|---|--|
| | VIII.2 Buyers and clients of the shops | No estimates available | Buyers and clients of the shops they will be slightly affected as the area of influence has thousands of shops of the same nature. |
| | VIII.3. Users of public transportation (e.g. tram, metro, minibuses, buses, taxis) | No estimates available | They will be slightly affected as alternative transportation means are available within the area of influence. |
| IX Shops and businesses along the RoW and near stations that will lose total access to their shops or experience partial loss of access and reduced customer traffic ³⁶ | IX.1 : The shop' owners or tenants that might potentially be affected due to total loss of access to their shops resulting in closure of business | No estimates available (NAT has committed not to implement any road closures and restrictions) | If impact occurs, they will be severely affected due to the closure of access roads to their shops and may have to shut-down their operations. |
| | IX.2 The shop' owners or tenants along the RoW and near stations who might potentially be affected due to partial loss of access and reduced customer traffic | No estimates available (NAT has committed not to implement any road closures and restrictions) | If impact occurs, they will be affected temporarily due to reduced access to their shops and resulting income losses. |
| | IX. 3: The shop' employees who might be affected due to the total loss of access to their shops where they work. | No estimates available | If impact occurs, they will be affected and may lose their jobs temporarily. |
| X. Transport Operators | X.I Tuk tuk drivers/ co-drivers | No estimates available | No adverse impacts on their livelihood are anticipated. |
| | X.II Microbus divers / co drivers | | |

³⁶ NAT has confirmed that no full loss of access to shops and business is contemplated. The assumption is that unless it is totally unavoidable there is a commitment to ensure access to shops and business at all times.

| Category | Subcategory | Total number of affected groups | Comments |
|----------|----------------------------------|---------------------------------|----------|
| | X.III Bus drivers and conductors | | |

It is worth mentioning that APTA is not eligible for any compensation as they are a governmental entity that will face a transfer of ownership. They will not lose their revenue as the operational cost of the Raml Tram exceeded the revenue. Therefore, the transfer of ownership will result in no economic displacement impacts on APTA. Consequently, they will not be entitled for any compensations.

5.3 Entitlements

Entitlements have already been discussed with NAT and APTA. Based on documentation and lease contracts obtained from APTA, APTA detailed the logic used to value affected assets, as described below.

Table 5-2 : Entitlement Matrix

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-------------------------------------|--|---|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| Loss of rental business (permanent) | I. Tenants of Shops and Kiosks in stations owned by APTA | I.1: Tenant of shop/Kiosk with contract ending before June 2022 ³⁷ | (12) | No specific entitlement according to Egyptian Laws | <p>Cash compensation</p> <ul style="list-style-type: none"> • Cash compensation at full replacement cost (RC) for lost income including:³⁸ <ul style="list-style-type: none"> ○ All tenants except for those who have their contract terminated before 2014 and pay tenancy fees more than 500 EGP per month (more than 32 US\$) will receive 3-month lease equivalent to market value of rental for shops of similar characteristics or better in the same neighbourhood/ street/sub-district based on the valuation carried out by the Compensation Committee (CC).³⁹ The valuation will be based on the rental lease valued predefined in the RPF (Refer to section 6.6).⁴⁰ The tenants whose contract was terminated before 2014 and pay low renting fees (below 500 EGP about 32US\$) are entitled for (3) month lease equivalent to market value as mentioned above. ○ As the tenants with valid contract until December 2013 pay a relatively low renting value (less than 500 EGP), they will be in need for longer period to restore their income. It is essential to consider that the lease fees of the alternative shops might be more expensive than the current leased shops. ○ 3 months of the net revenue value (excluding all expenses e.g. water fees, workers' salaries, electricity cost). The calculation of the revenue will be done by the Compensation Committee based on real evaluation of similar shop activity following methodology as reported in the RPF (refer to Section 6.6).⁴¹ ○ The alternative shops should be in the same conditions or better than the current shops as stipulated by EIB/AFD requirements. ○ For the items and objects that cannot be relocated, cash compensation for the affected asset will be provided. The cash compensation should be the value of similar items or objects. |
| | | I.2 Tenant of Shops/ kiosks with valid contract after June 2022 | (43) | | |
| | | I.3: Tenant of APTA shop/Kiosk with contracts that ended before 2014 but continued to pay low rents | (20) | | |
| | | I.4: Tenants with contracts ended from 2015 to 2021 | (16) | | |

³⁷ These two categories have been defined because NAT suggested that those whose contract would expire before start of construction should not be entitled to compensation. Since the standard practice is for tenants whose contracts expire to continue paying rent until the new tenant is identified it was considered appropriate to include these tenants as eligible for compensation regardless of contract expire date.

³⁸ If Compensation Committee (CC) compensation falls below RC (Replacement Cost), NAT will inform the committee about the requirement of funding agencies before starting the compensation activities. This will take place before the committee valuate assets. NAT will issue an approval from the Chairman of the CC to valuate the compensation according to the full replacement cost to be presented in the RAP based on the approval or decree that will be received from his Excellency the Minister of Transport. The approval/ decree will include an annex that provides guidance about the entitlement and methodology of compensation valuation including market rates to be applied. Additionally, NAT representative within the CC will attend all the meetings that will be carried by the CC. His attendance and participation in guiding the committee to achieve full replacement will guarantee the commitment of the CC to apply what was presented in the RAP.

³⁹ The CC will be formulated based on a decree from the governor or the Minister of Transport. The CC will be composed of representative of General Authority of Government Services (GAGS), and a representative of Agricultural Directorate (AD), the Directorate of Housing and Utilities (DHU) and the Directorate of Real Estate Taxes (RET) in the governorate level. Department of Land Surveying (LS) in Alexandria Governorate, Housing Surveys (HS) inside Governorate Authority, and APTA. In addition to representative of the owner (NAT and MOT) and the PAPs who will be selected by affected people to speak on their behalf. In the RAP, the nominated PAPs will be identified and reasons for selection will be presented. The selection of PAPs will be based on: 1) those who are interested to participate in the committee will inform the Community liaison officer of NAT, 2) a list of nominees will be shared with the PAPs. 3) They will select between 3-5 peoples. 4) The CC will be informed about the selected people. Moreover, the district authorities and other units might attend.

⁴⁰ NAT and the Ministry of Transport play a major role in the compensation process by issuing Public Interest Decree and provision of compensation in line with the international standards. In order to overcome the challenge of ensuring that the CC will define compensation and entitlements in alignment with EIB/AFD standards, NAT will submit a memo to his Excellency the Minister of Transport in order to approve on all elements of compensation requirements. Upon his approval, the CC will adhere to all compensation requirements.

⁴¹ The tax register will not be credible or reliable to evaluate the revenue. The RPF will provide information about the revenue of similar shops as reported by the PAPs themselves during consultation activities carried in October -November 2021. This might be an acceptable reference. A full list of revenue of similar activity was prepared based on the consultation with the PAPs (see Annex 17) 59 of the PAPs shared this information.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|--------------------|-----------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> ○ Provision of the painting cost of the replacement shop.⁴² ○ Cash allowance to cover legal costs.⁴³ ○ In case that the tenants take on workers NAT will pay salaries for a period of 3 months (Please see more details about this in the entitlement of workers below). ○ NAT will disburse the tenancy fees of the new shops, painting cost and the revenue 3 months prior to evacuation. This will enable the PAPs to lease the shop and start operation even prior to the evacuation. NAT has already allocated 50 million EGP according to the Public Interest Decree to be used for compensation. <p>In kind support</p> <ul style="list-style-type: none"> • Support to shop tenants with transportation of materials and goods to the alternative shop.⁴⁴ <p><u>Vulnerability assistance</u></p> <ul style="list-style-type: none"> • Shops and kiosks that have monthly revenue less than 2,500 EGP will receive additional support by providing them ,in full cooperation with the Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA), with capacity building to operate a shop and micro-projects. A Memorandum of Understanding will be signed between NAT and MSMEDA to provide training sessions to the PAPs. • They will also receive a cash compensation equivalent to 50% of their revenue. NAT will calculate this percentage and add it to the total estimated revenue cost. Accordingly, the minimum revenue compensation to be paid (revenue value + 50% vulnerability assistance) is 11,250 EGP total. <p><u>Engagement Actions</u></p> <ul style="list-style-type: none"> • The tenants were informed about the project and its impacts on their livelihood (Reference to the Stakeholder Engagement Plan and the consultation activities reported on in the RPF). This activity has been completed by the Project surveying team during the preparation of the RPF in October – December 2021. • Tenants will be oriented by NAT Community liaison officer about how to rationally select an alternative shop that they will afford paying the tenancy fees for after the transitional period. • Robust stakeholder engagement activities will be applied so as to inform them about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation. • Immediately after issuing the Public Interest Decree The tenant will be informed about the exact time of evacuation in order to be able to move his/her belongings without damaging them. The exact time will be shared with the tenants at least one month prior to evacuation. • The engagement program highlighted in the SEP will be implemented. |
| | | I.5 : Sub-tenants | (2) | No specific entitlement according to Egyptian Laws. Additionally, they are considered as informal | They are considered as tenants; accordingly, they are entitled for the same remedial actions mentioned above in (group I.1 & I.2). |

⁴² NAT in full cooperation with the CC define five categories of compensation for painting. This will be based on the current area of the affected shop.

⁴³ cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.)

⁴⁴ NAT will contract a firm to properly transport all goods. The contract with the firm will include an item about the liability of this firm on any damage to occur to the goods during transportation process.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------------|---|---|---|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | occupants who are entitled for no compensation | |
| Loss of employment | II. Individuals engaged in labour in stations shops | II.1: Individuals with formal permanent contract with governmental enterprises e.g. Dar El Helal publishing enterprise. ⁴⁵ | 8 persons (based on self-reported information by the workers) | They are entitled to receive two months compensation as per labour law No. 12 of 2003 | <p>The enterprises will be informed about the project in order to relocate the employees/workers in other branches of the enterprise. Alternatively, if his/her contracts are terminated the following will be provided:</p> <p>Cash Compensation</p> <ul style="list-style-type: none"> 3 months' salary based on payroll records. Payment will be based on approval from the tenant of the shop on monthly basis. Accordingly, the workers will not leave the business. Their payment will be given by compensation committee on monthly basis to the shop tenants who will be required to provide a proof of receipt to CC signed by the worker and including date, amount, and mode of payment.⁴⁶ <p>In kind support</p> <ul style="list-style-type: none"> They will also be informed about employment websites and the contact information about these websites, e.g. cell phone/ phone numbers/ address and available jobs that match their qualifications (Annex 14 Employment Websites in Egypt). Capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA). The types of capacity building will be about micro project feasibility studies, marketing, readymade garments, and other professions. A Memorandum of Understanding will be signed between NAT and the two entities (MSMEDA and Ministry of Industry) to provide support and capacity building to workers. A list of available capacity building programs and modules will be shared with the PAPs and will be presented in the RAP. <p>Engagement Activities</p> <ul style="list-style-type: none"> The workers will be informed about the project and its impacts on their income. The enterprises will be informed about the project in order to relocate the employees/workers in other branches of the enterprise. |
| | | II.2: Individuals with formal permanent contract with the shops' tenants | 10-15 people (estimate based on self-reported information during consultations with shop tenants) | They entitled to receive two months compensation as per labour law No. 12 of 2003 | <p>In case that the affected worker will continue working on the same business the following will be adhered:</p> <p>Cash compensation</p> <ul style="list-style-type: none"> Given the fact that the tenant have no income during transitional period and if the shop tenant will lease an alternative shop and he is willing to move workers to, the worker will be provided with 3-month salary to be paid directly by the compensation committee or the governorate authority.⁴⁷ <p>However, if the worker has their contract terminated or decides not to continue working in the same business the following will be adhered to⁴⁸:</p> <p>Cash Compensation</p> |

⁴⁵ The specifics of contractual status of these employees will be assessed further at the time of the census.

⁴⁶ NAT is responsible for the payment of all compensations but the entity responsible for disbursing the compensation to the PAPs is the committee or governorate authority.

⁴⁷ The CC in cooperation with NAT will provide the salary to tenants on monthly basis and will follow up with the tenant to make sure that the salary was duly paid to the workers through provision of a signed receipt by the worker as proof including date of payment and amount. The monthly salary will be based on an evidence to be provided by the tenant e.g. pay slip. In case of having no evidence, the CC will estimate the salary based on average salary of the officially contracted people with the same position.

⁴⁸ Under consideration by ECS whether payments for workers that will resign might be an incentive for people leaving their jobs in exchange of some cash advancement.,

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|--|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> 3-month salary based on payroll.⁴⁹ Workers will obtain an official termination letter from the tenant in order to get the full compensation at least one month prior to eviction. The workers will be informed about the exact time of evacuation at least three months before in order to be able to find an alternative job. All workers will be informed about the exact time by the RAP Consultant. After issuing the Public Interest decree at least 3 months before eviction. They will receive 3- month salary based on a signed receipt from the tenant. <p>In kind measures</p> <ul style="list-style-type: none"> Provide them with capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA) if they request for. As mentioned above, both entities provide a wide range of capacity building programs, e.g. feasibility studies, marketing, readymade garments, and other professions. A list of all available trainings will be prepared and annexed to the RAP. In addition, the list will be shared with the affected workers during RAP preparation after the census. <p>Engagement activities (all workers)</p> <ul style="list-style-type: none"> Robust stakeholder engagement activities will be applied to inform workers about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation. The workers will be informed about the exact time of evacuation immediately after issuing the Public Interest Decree by the RAP consultant in order to be able to make an informed decision and find an alternative job in case they decide to terminate their current contractual arrangements. All workers will be informed about the project and its impacts on their income. All will be informed about employment websites and available jobs that match with their qualifications. The Project surveying team prepared a list of recruiting firms in Alexandria (see Annex 14). |
| | | II.3: Individuals with informal contracts with shop tenants ⁵⁰ | 20-25 workers (estimate based on self-reported information during consultation with the tenants) | No entitlement according to the Egyptian law | <p>For workers that will continue working in the same business, the following will be adhered to:</p> <p>Cash compensation</p> <ul style="list-style-type: none"> If the shop tenant will lease an alternative shop and they are willing to relocate workers, the worker will be provided with 3-month salary to be paid directly by NAT to the shop tenants who will then be responsible for forwarding the compensation to the workers. Shop tenants will be required to submit a proof of payment to NAT signed by the workers acknowledging receipt of the payment, and including date, amount, and mode of payment.⁵¹ <p>However, if the worker has their contract terminated, the following will be adhered to:</p> <p>Cash Compensation</p> |

⁴⁹ As per footnote 30, the worker will receive the payment through the tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment.

⁵⁰ Under consideration if the project will have to ensure that all workers have a formal contract to allow compensation to be paid. ECS to confirm through engagement with NAT.

⁵¹ The CC in cooperation with NAT will provide the salary to workers on monthly basis after receiving an approval from the tenant. The monthly salary will be based on an evidence to be provided by the tenant e.g. pay slip. In case of having no evidence, the CC will estimate the salary based on average salary of the officially contracted people with the same position.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|------------------|---|----------------------|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> 3-month salary based on payroll or receipts. Compensation will be paid to the shop tenant who will then forward the amount to the workers as described above. Workers will obtain an official termination letter from the tenant in order to get the full compensation prior to relocation of business. The workers will be informed about the exact time of evacuation immediately after issuing the Public Interest Decree by the RAP consultant in order to be able to find an alternative job. The information will be shared 3-months before eviction. <p>In kind measures</p> <ul style="list-style-type: none"> Capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA) if they request for. The types of capacity building will be about micro project feasibility studies, marketing, readymade garments, and other professions. A Memorandum of Understanding will be signed between NAT and the two entities to provide support and capacity building to workers. A list of available capacity building programs and modules will be shared with the PAPs and will be presented in the RAP. <p>Engagement activities (all workers)</p> <ul style="list-style-type: none"> Robust stakeholder engagement activities will be applied to inform workers about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation. The workers will be informed about the exact time of evacuation at least three months before relocation of current business in order to be able to make an informed decision and find an alternative job in case they decide to terminate their current contractual arrangements. All workers will be informed about the project and its impacts on their income. All will be informed about employment websites and available jobs that match with their qualifications. The Project surveying team prepared a list of recruiting firms in Alexandria (see Annex 14). |
| | | II.4 Individuals engaged in casual work e.g. waiters in cafés and restaurants | TBD after the census | No entitlement according to the Egyptian law | They will receive the same entitlement of group II.3. |
| | | II.5 Workers of the tram who are working in the Raml Tram now and are permanently recruited by APTA | 200 | No entitlement according to the Egyptian law as they will not lose their jobs | <p>Cash compensation</p> <ul style="list-style-type: none"> No cash compensation will be provided. <p>Engagement activities</p> <ul style="list-style-type: none"> Workers will be informed about the project and its impacts. <p>Mitigation measures</p> <p><i>During construction:</i></p> <ul style="list-style-type: none"> APTA will be responsible for relocation of their workers. APTA will provide detailed process of relocation. APTA will share information with NAT about relocation of their workers. <p><i>During operation:</i></p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--|---|---|---|---|---|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> Provide the drivers, workshop workers and conductors with capacity building to be able to work in the rehabilitated tram (if possible). <p>Alternatively</p> <ul style="list-style-type: none"> APTA will employ them as happened during construction phase. Any worker that reaches 60 years old will be excluded as they will receive their pension. |
| | | II.6 Workers of the mosque (Gafaar Ibn Aby Taleb NGO) | 4 full time+ 1 part time were recruited by the NGO 1 Imam recruited by the Ministry of Endowment | No entitlement according to the Egyptian law as they will not lose their jobs | <ul style="list-style-type: none"> The 4 workers will be entitled for same compensation and in-kind support as Cat. II.3 . The only difference is that they will receive 6-month salary prior to demolishing the mosque as the mosque will not be reconstructed and no alternative mosques will be made available to employ workers in. The Imam will be reallocated by the Ministry of Endowment. Accordingly, he is not entitled for cash compensation. |
| Loss of access to trading location (permanent and temporary) | III. Informal Mobile and semi/mobile street vendors along the RoW and near stations | III 1: Semi-mobile Vendors who have a stable hand cart/ table/ stalls in Victoria, Bakous stations, and along the RoW | Estimated 10 in the stations only. ⁵² | No specific entitlement according to the Egyptian law. On the contrary, they are considered as illegal occupants of streets and are chased by the police force. | <p>Although some of the vendors located at the stations may benefit to some extent from the presence of workers, it is expected that most vendors along the RoW and those occupying the side streets outside the fenced areas will need to relocate to alternative trading locations during the construction phase which might result in disturbance and loss of income. The vendors should will be able to continue working and earning income. Based on similar projects that have been implemented by NAT street vendors benefit a lot from the project as they can stand beside the construction metal fence during construction phase.</p> <p>Engagement activities</p> <ul style="list-style-type: none"> No specific entitlement. However, robust stakeholder engagement programme with informal street vendors to explain construction activities, schedules and grievance mechanism will be implemented. Stakeholder engagement and feedback will also serve as basis to identify appropriate measures and integrate them in the Construction Disturbance Management Plans that will be developed by the contractors in charge of construction of the tram to avoid or minimise socio-economic impacts on street vendors. NAT/contractor in close coordination with the Alexandria municipal authorities also will show or direct the vendors to alternative trading locations including vacant spaces and areas of safer conditions. Robust monitoring to confirm welfare status. <p>In kind support</p> <ul style="list-style-type: none"> Support from NAT/contractor in relocation as needed (some vendors may require support in moving tables and stalls and other equipment as applicable if these are kept at the location and not removed daily). |
| | | III 2: Mobile Vendors who have no fixed workplace | Estimated 20-30 in the stations only. ⁵³ | No specific entitlement according to the Egyptian law. However, they are considered as illegal occupants of streets and | <p>Engagement activities</p> <p>Given the fact that they will not be affected, and as per EIB standards, no specific cash-based entitlement will take place. However, robust stakeholder engagement programme with informal street vendors to</p> |

⁵² Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW.

⁵³ Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-----------------------------|---------------------|---|---|---|---|
| | Primary Category | Secondary Category | | | |
| | | <i>(This category can be found at most of stations, and along the ROW)</i> | | are chased by the police force. | <p>explain construction activities, schedules and grievance mechanism will be implemented. Also robust monitoring to confirm welfare status.</p> <p>In kind support</p> <ul style="list-style-type: none"> Support with securing temporary access to new trading locations and/or enabling them to stay beside the construction fence that surrounds the construction sites. This venue will be supportive to vendors as police will not chase them. Additionally, NAT should sign a Memorandum of Understanding with the security department, the governorate authority, social solidarity directorate that enables vendors to work safely at the designated areas. <p>Vulnerability assistance</p> <ul style="list-style-type: none"> Additional vulnerability assistance to individuals with large numbers of dependents in household (children, elderly, disabled) and/or those who are the primary providers for their households. The assistance can be secured by NGOs (Misr El Kheir- Caritas- Resalla...etc) who have similar supportive programs in Alexandria governorate. |
| | | III 3: Mobile Vendors who work inside the tram wagons | Estimated 15-25. ⁵⁴ | No specific entitlement according to the Egyptian law. However, they are considered as illegal occupants of streets and are chased by the police force. | <p>Engagement activities</p> <p>No specific entitlement. However, robust stakeholder engagement programme with informal street vendors to explain construction activities, schedules and grievance mechanism will be implemented. Also, robust monitoring to confirm welfare status.</p> |
| Loss of access to a shelter | IV. Street children | IV 1: Street children with no alternative accommodation arrangement | The rough estimate of this category is 3-5 children | No specific entitlement according to the Egyptian law. However, they are classified as orphans that need shelters. | <p>NAT has two scenarios to follow:</p> <ol style="list-style-type: none"> 1- Either to accommodate them in a governmental shelter 2- Or accommodate them in a Shelter run by an NGO (if possible) <p>In kind support</p> <ul style="list-style-type: none"> NAT will sign a Memorandum of Understanding with the security department, the governorate authority, NGOs, Social Solidarity directorate and Health directorate. This Memorandum of Understanding aims to provide proper accommodation for street children. Street children will be engaged with by the social solidarity directorate staff who work in “ Children and Homeless Without Shelter Program”. As the social solidarity team has wide experience in dealing with street children. They will be the responsible entity in cooperation with NAT. Street children will be accommodated in governmental shelters that are affiliated to the Ministry of Social Solidarity upon their free will (if they are above 12 years and can choose for themselves). The young street children below 12 years old will be sent to a shelter. Alternatively, they might be accommodated in the NGOs shelters. |

⁵⁴ Note these estimates may no longer be accurate and will need to be adjusted closer to the construction start date. The number will also be adjusted to consider PAPs along the RoW, as applicable.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|--------------------------------|--|--|---|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> Provide them with capacity building programs or sending them back to schools, upon their free will, the capacity building will be on carpentry, how to start small business and food production. The health directorate will secure any medical check-up required in order to accommodate children in the shelters. <p>Engagement activities</p> <ul style="list-style-type: none"> For those who are unwilling to get into shelters, they will be informed about the project and the necessity to stay outside the tram route by the social solidarity team . They should also be informed of a CLO/contact person and the GRM established for the project so that they can come forward for needs and requests. |
| | | IV 2: Street children who have shelters or families | The rough estimate of this category is 2-5 children | No specific entitlement according to the Egyptian law. However, they are considered fugitives that need to be taken back to their families. | Social solidarity directorate will work with street children in order to convince them to reunite with their families. Alternatively, all above mentioned procedures including engagement activities (mentioned in group IV (1) will be applied. |
| | | IV 3: Street children engaged in illegal business (e.g. drug dealing) | To be defined during the census with the help of Social Solidarity The rough estimate is 3-6 children | They are entitled to be supported and accommodated in Juvenile Justice as they are of delinquency behaviour. | <p>In kind support</p> <ul style="list-style-type: none"> In full cooperation with the security staff, Juvenile unit, Social Solidarity directorate and NAT Community liaison officer they will be engaged with prior to the project. They can be sent to Juvenile shelters (if possible). In full cooperation with Social Solidarity directorate and Health directorate, the drug addicts might be sent to rehabilitation centres (if possible). <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project and the necessity to stay outside the tram route by the social solidarity team three months prior to construction activities. They should also be informed of a CLO/contact person and the GRM established for the project so that they can come forward for needs and requests. |
| | V. Homeless and street beggars | V 1: Homeless people with mental disability (this category was reported by the social solidarity team) | To be defined during the census with the help of Social Solidarity 1 person | No entitlement according to law | <p>In kind support</p> <ul style="list-style-type: none"> In full cooperation with Health Directorate, they will be directed to hospital. They will be tested by Health Directorate and based on the medical check-up report they will be sent to the psychiatric hospital in Cairo as possible. They should be allowed to express their consent to be sent to the hospital depending on the mental disability severity. <p>Alternatively,</p> |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|---------------|---|---|---|--|--|
| | Primary Category | Secondary Category | | | |
| | | | | | <ul style="list-style-type: none"> They will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be provided with blankets, food, water and medication by the initiative. <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project impacts and the necessity to evacuate the construction site. |
| | | V 2: Homeless people who have no accommodation | To be defined during the census with the help of Social Solidarity 3-5 persons are estimated | No entitlement according to law | <p>In kind support</p> <ul style="list-style-type: none"> They will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be provided with blankets, food, water and medication by the initiative. A Memorandum of Understanding will be signed with NAT, Health Directorate and Security department to provide the homeless with required support. <p>Engagement activities</p> <ul style="list-style-type: none"> They will be informed about the project impacts and the necessity to evacuate the construction site. Robust stakeholder engagement programme with them to explain construction activities, schedules and grievance mechanism will be implemented. <p>Vulnerability assistance</p> <ul style="list-style-type: none"> Additional vulnerability assistance can be provided in form of food, medication, etc by the project or by the NGOs e.g. Resala, Caritas, Misr El Kheir. |
| | | V 3: Homeless people who work as beggars and have alternative accommodation | 5-8 people are estimated | No entitlement according to law. However, they violate the law by committing begging activities. | <p>In kind support</p> <ul style="list-style-type: none"> They will be enabled to stay outside the corridor of the Tram. <p>Engagement activities</p> <ul style="list-style-type: none"> In order to enable the street beggars to restore their income, a robust stakeholder engagement programme with informal street beggars to explain construction activities, schedules and grievance mechanism. |
| Loss of trees | VI. Tenants of Shops and Kiosks owned by APTA (same as Cat. I) and who have planted trees | VI. 1 Shop tenant who planted decoration trees (in the garden or in the vicinity of shop) | 1 | Entitled for monetary compensation | <p>Cash compensation</p> <ul style="list-style-type: none"> Monetary compensation to be provided to the owner of affected decoration trees based on the value determined by the Agriculture Directorate. <p>In kind support</p> <ul style="list-style-type: none"> The owner of the trees will be enabled to move the decoration trees (about 10 trees) |

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--|--|--|---|---|--|
| | Primary Category | Secondary Category | | | |
| Loss of communal infrastructures | VII. Religious structure | VII. 1 Mosques | 1 small praying structure located on the pavement of Victoria station 1 big mosque that is run by an NGO | The Ministry of Endowment receives all compensation related to mosques. | <p>Cash compensation</p> <ul style="list-style-type: none"> NAT will disburse a compensation to the Ministry of Endowment. The Ministry is the sole entity responsible for defining the compensation value. The compensation to be defined by the Ministry of Endowment covers all costs. The Ministry will disburse the compensation to the NGO that operates the big mosque. It is noted that the NGO constructed the mosque. With regards to the small praying structure located on the pavement of Victoria station, the Ministry of Endowment can keep the compensation as there is no owner of the small praying structure located on the pavement of Victoria station. NAT should follow up with the Ministry of Endowment to be sure that the NGO has received their compensation. The Ministry must share with NAT official documents and evidence that they disbursed the compensation to the NGO running the mosque. <p>In kind support</p> <ul style="list-style-type: none"> Given the fact that the NGO collects charity money from the surrounding areas of the mosque and the prayers, NAT will support the NGO by installing a banner informing the new location where community people can communicate with the NGO to collect the charity financial support. Those who work inside the mosque now will collect money from the surrounding communities. <p>Engagement activities</p> <p>A robust stakeholder engagement programme with the NGO will be applied.</p> |
| Impact on Community people | VIII. Users of mosques, shops, transportation services and garden | VIII.1 Users of the mosques VIII.2 Buyers and clients of the shops VIII.3 Users of public transportation (e.g. tram, metro, minibuses, buses, taxis) | NA | No entitlement | <ul style="list-style-type: none"> No adverse impacts on their livelihood are anticipated therefore no compensation is defined. <p>Engagement activities</p> <ul style="list-style-type: none"> A robust stakeholder engagement programme with this category will be applied. Information will be shared about the project, its impacts, duration, alternative traffic routes and GRM |
| Temporary loss of income due to construction disturbance | IX. Shops and businesses along the RoW and near stations that will lose total access to their shops or experience partial loss of access | IX.1 : The shop' owners or tenants along the RoW and near stations that might potentially be affected due to the total loss of access to | Not determined yet | No entitlement. However, NAT has developed procedures to manage the impacts on this category before | <p>Cash compensation:</p> <p>NAT RAP Compensation Committee will calculate the compensation based on monthly revenue of similar activity within the same street or the monthly revenue of the affected shop prior to closure of the access. As well as cash or in kind support for covering legal costs for the reestablishment of the business in new location as applicable.⁵⁷</p> |

⁵⁷ cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.)

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|--------------|--|---|--------------------|--|---|
| | Primary Category | Secondary Category | | | |
| | and reduced customer traffic ⁵⁵ | their shops resulting in closure of business ⁵⁶ | | | <p>Engagement activities</p> <ol style="list-style-type: none"> 6. A robust stakeholder engagement programme with the affected tenants/ owners and employees will be applied. 7. Prior to closure of any shop, the shop tenants/ owners will be informed about the closure of access to their shops, the compensation approach and the grievance channels. 8. The tenants /owners of the shops will be allowed to install a poster informing whether they are operating or not. <p>Vulnerability assistance</p> <ul style="list-style-type: none"> • To be determined based on the affected shops, as no data available for the time being about the shops that will be affected. • Transitional allowance or support during the interim period until access is re-established. • Assistance in relocation of structures and right to salvage material. |
| | | IX.2 The shop' owners or tenants along the RoW and near stations who might potentially be affected due to partial loss of access and reduced customer traffic | Not determined yet | No entitlement. However, NAT has developed ad hoc procedures based on national standards to manage the impacts on this category before (see Section 5.2) | <i>Refer to Section 5.2</i> |
| | | IX. 3: The shop' employees who might be affected due to the total loss of the access to their shops where they work. | Not determined yet | No entitlement | <p>Cash compensation:</p> <ul style="list-style-type: none"> • NAT will calculate the compensation for shop employees on their monthly salary. Employees will receive their compensation through the shop tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment. <p>Engagement activities</p> <ul style="list-style-type: none"> • A robust stakeholder engagement programme with the affected tenants/ owners and employees will be applied. • Prior to closure of any shop, the employees will be informed about the closure of access to their shops, the compensation mechanism and the grievance channels. |

⁵⁵ NAT has confirmed that no full loss of access to shops and business is contemplated. The assumption is that unless it is totally unavoidable there is a commitment to ensure access to shops and business at all times.

⁵⁶ This is not to be confused with the shops and businesses experiencing reduced customer traffic due to reduced access to the shops (category IX.2). The approach for compensating these shops and businesses is described in Section 5.2. To be considered for compensation disturbance should be more than month interruptedly.

| Type of loss | Eligible Groups | | Num. PAPs | Entitlements in Accordance with Egyptian Requirements | Additional Entitlements to meet International Standards and Requirements |
|-----------------------------------|------------------------|------------------------------------|-----------|---|---|
| | Primary Category | Secondary Category | | | |
| Loss of Transportation livelihood | X. Transport operators | X.I Tuk tuk drivers/ co-drivers | | | <ul style="list-style-type: none"> No adverse impacts on their livelihood are anticipated therefore no compensation is defined. <p>Engagement activities</p> <ul style="list-style-type: none"> A robust stakeholder engagement programme with this category will be applied. Information will be shared about the project, its impacts, duration, alternative traffic routes and GRM |
| | | X.II Microbus drivers / co drivers | | | |
| | | X.III Bus drivers and conductors | | | |

6. COMPENSATION, INCOME RESTORATION AND RESETTLEMENT ASSISTANCE

Based on discussions with the Real State Department in NAT, the following compensation procedures were proposed:

6.1 Compensation for the Shops/Restaurants/ Kiosks in Stations:

The Project has minimized the adverse impacts by avoiding permanently damaging any shops outside the route of the Tram as reported earlier.

The tenants of the shops/restaurants at station locations will be informed about the date of expropriation of shops after issuing the Public Interest Decree in order to be able to lease alternative shops. This will be done based on robust consultation process. The RPF Project surveying team started the consultation by informing all affected shops about the Project and its impacts on their shops.

Cash compensation

- Cash compensation at full replacement cost (RC) for lost income including:
 - All tenants except for those who have their contract terminated before 2014 will receive 3-month lease equivalent to market value of rental for shops of similar characteristics or better in the same neighbourhood/ street/sub-district based on the valuation carried out by the consultant in the RPF. The valuation will be based on the rental lease valued predefined in the RPF (Refer to Section 6.6). The tenants whose contract was terminated before 2014 and pay low renting fees (less than 500 EGP = 32 US\$) are entitled for (3) month lease equivalent to market value as mentioned above.
 - 3 months of the net revenue value (excluding all expenses e.g. water fees, workers' salaries, electricity cost). The calculation of the revenue will be done by the Compensation Committee based on real evaluation of similar shop activity following methodology as reported in the RPF (refer to Section 6.6).
 - For the items and objects that can't be relocated, cash compensation will be provided. The value will be calculated based on an alternative item or object of better conditions. The CC will get the market value from the suppliers of each item e.g. air condition firms, firefighting systems, etc.
 - Provision of the painting cost of the replacement shop.

- Cash or in kind support to cover legal costs for all transactions relating to the reestablishment of the business in an alternative location as applicable. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.
- In case that the tenants take on workers NAT will pay salaries for a period of 3 months (Please see more details about this in the entitlement of workers below).
- NAT will disburse the tenancy fees of the new shops, painting cost and the revenue 3 months prior to evacuation. This will enable the PAPs to lease the shop and start operation even prior to the evacuation.

In kind support

- Support to shop tenants with transportation of materials and goods to the alternative shop.

Vulnerability assistance

- Shops and kiosks that have monthly revenue less than 2500 EGP will receive additional support by providing them ,in full cooperation with the Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA), with capacity building to operate a shop and micro-projects. A Memorandum of Understanding will be signed between NAT and MSMEDA to provide training sessions to the PAPs.

Engagement Actions

- The tenants were informed about the project and its impacts on their livelihood (Reference to the Stakeholder Engagement Plan and the consultation activities reported on in the RPF). This activity has been completed by the Project surveying team during the preparation of the RPF in October -December 2021.
- Tenants will be oriented by NAT Community liaison officer about how to rationally select an alternative shop that they will afford paying the tenancy fees for after the transitional period.
- Robust stakeholder engagement activities will be applied so as to inform them about their entitlement, grievance mechanism, compensation procedures, the time schedule and required legal documents needed to disburse their compensation.

- The tenant will be informed about the exact time of evacuation in order to be able to move his/her belongings without damaging them. The exact time of sharing information is about one month prior to evacuation.

6.2 Compensation for the temporary Impacts on tenants, employees and owners of shops along the Row experiencing full loss of access:⁵⁸

NAT has confirmed that no full loss of access to shops and business is contemplated. The assumption is that unless it is totally unavoidable there is a commitment to ensure access to shops and business at all times. However, in the unlikely event that shops experience complete loss of access which may result in business shutdown, NAT through the RAP Compensation Committee has developed a system for compensating this category. Entitlements will be determined as follows:

Cash compensation:

The RAP compensation committee will calculate the compensation based on monthly revenue of similar activity within the same street or based on the affected shop monthly revenue.

- **Owners/tenants of shops**
 - Full value of compensation based on monthly revenue of similar shop in the same street or equivalent to the last month revenue of the same shop prior to closure of the access.
 - Cash or in kind support to cover legal costs for all transactions relating to the reestablishment of the business in an alternative location as applicable. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.
- **Employees of the shops**
 - Full value of monthly salary to be paid to the employee. Employees will receive their compensation through the shop tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment.

Engagement activities

⁵⁸ This is not to be confused with the shops experiencing partial loss of access and reduced customer traffic. These shops will be compensated through alternative channels outside the RAP as discussed in Section 5.2.

1. A robust stakeholder engagement programme with the affected tenants/ owners and sales person will be applied.
2. Prior to closure of any shop, the shop tenants/ owners will be informed about the closure of access to their shops, the compensation approach and the grievance channels.
3. The tenants /owners of the shops will be allowed to install a poster informing whether they are operating or not.

Vulnerability assistance

- The vulnerability assistance of the shop owners and tenants will be determined based on the affected shops, as no data available for the time being about the shops that will be affected.
- Transitional allowance or support during the interim period will be extended to shop owners/tenants and workers until access to the shop is re-established (for owners/tenants) and until employees can find alternative employment or are able to restore their income to pre-impact levels.
- Assistance in relocation of structures and right to salvage material.

6.3 Compensation for Mosques:

There are two praying facilities / mosques within the project site. One of them is a big mosque that was constructed by an NGO and the second one is small praying structure located on the pavement of Victoria station

Cash compensation

- NAT will disburse a compensation to the Ministry of Endowment
- They Ministry is the soul entity responsible for defining the compensation
- The compensation to be defined by the Ministry of Endowment covers all cost
- The Ministry will disburse the compensation to the NGO that operates the mosque. It is noted that the NGO constructed the mosque.
- NAT should follow up with the Ministry of Endowment to be sure that the NGO has received their compensation
- The Ministry must share with NAT official documents and evidences that they disbursed the compensation to the NGO running the mosque

In kind support

- Given the fact that the NGO collects charity money from the surrounding areas of the mosque and the prayers, NAT will support the NGO by installing a banner informing the new location where community people can communicate with the NGO to collect the charity financial support
- Those who work inside the mosque now will collect money from the surrounding communities

Engagement activities

4. A robust stakeholder engagement programme with the NGO that is operating the mosque and the staff of the mosque will be applied .

6.4 Compensation for Workers:

Cash Compensation

- **Workers who have legal contracts with formal governmental enterprises:** 3 months' salary based on payroll records. Payment will be based on approval from the tenant of the shop on monthly basis. Accordingly, the workers will not leave the business. Their payment will be given by compensation committee on monthly basis to the shop tenants who will be required to provide a proof of receipt to the CC signed by the worker and including date, amount, and mode of payment.
- **Workers who have legal contracts with shop tenants:** If the shop tenant will lease an alternative shop and he is willing to move workers to, the worker will be provided with 3-month salary to be paid directly by the compensation committee or the governorate authority . However, if the worker has his contract terminated or decides not to continue working in the same business the following will be adhered to:
 - 3-month salary based on payroll. The worker will receive the payment through the tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment.
 - Workers will obtain an official termination letter from the tenant in order to get the full compensation prior to eviction

- The workers will be informed about the exact time of evacuation in order to be able to find an alternative job.
- They will receive 3- month salary based on a signed receipt from the tenant.
- **Workers with no formal contract:** If the shop tenant will lease an alternative shop and he is willing to move workers to, the worker will be provided with 3-month salary to be paid directly by NAT. However, if the worker has his contract terminated the following will be adhered to:
 - 3-month salary based on payroll or receipts. The worker will receive the payment through the tenant who will be required to provide a proof of receipt to NAT signed by the worker and including date, amount, and mode of payment.
 - Workers will obtain an official termination letter from the tenant in order to get the full compensation prior to relocation of business.
 - The workers will be informed about the exact time of evacuation at least one month before closure of the business in order to be able to find an alternative job.
 - They will receive 3- month salary based on a signed receipt from the tenant.
- **Workers of the Tram who are working for APTA:**

During construction:

- APTA will be responsible for relocation of their workers
- APTA will provide detailed process of relocation
- APTA will share information with NAT about relocation of their workers

During operation:

- Provide the drivers, workshop workers and conductors with capacity building to be able to work in the rehabilitated tram (if possible).
- **Workers of the mosque:** The 4 workers will be entitled for same compensation and in-kind support as the workers with no formal contract . The Imam will be reallocated by the Ministry of Endowment. Accordingly, he is not entitled for cash compensation.

In kind support

- They will also be informed about employment websites and their cell phone/ phone numbers/ address and available jobs that match their qualifications (Annex 14 Employment Websites in Egypt).
- Capacity building activities in full cooperation with the Ministry of Industry and Egyptian Micro, Small and Medium Enterprises Development Agency (MSMEDA) if they request for. The types of capacity building will be about micro project feasibility studies, marketing, readymade garments, and other professions. A Memorandum of Understanding will be signed between NAT and the two entities to provide support and capacity building to workers. A list of available capacity building programs and modules will be shared with the PAPs and will be presented in the RAP in addition to the cost .

Engagement Activities

- The workers will be informed about the project and its impacts on their income during the census survey by the RAP consultant and the CLO. This activity will be carried out by the first quarter of 2022 (about 3 months prior to evacuation).
- The enterprises will be informed at least 2 months about the project in order to relocate the employees/workers in other branches of the enterprise.

6.5 Street Children Remedial Actions

Based on discussions with NAT, social solidarity directorate (Annex 5 consultation 7), two options were concluded to mitigate the impacts on street children.

a. Street children who have families and not involved in illicit activities:

In kind support

- NAT will sign a Memorandum of Understanding with the security department, the governorate authority, NGOs , Social Solidarity directorate and Health directorate. This Memorandum of Understanding aims at proper accommodation of street children.
- Street children will be engaged with by the social solidarity directorate staff who work in “ Children and Homeless Without Shelter Program”. As the social solidarity team has wide experience in dealing with street children. They will be the responsible entity in cooperation with NAT.

- Street children will be accommodated in governmental shelters that are affiliated to the Ministry of Social Solidarity upon their free will (if they are above 12 years and can choose for themselves) The young street children below 12 years old will be sent to a shelter. Alternatively, they might be accommodated in the NGOs shelters.
- Provide them with capacity building programs or sending them back to schools, upon their free will, the capacity building will be on carpentry, how to start small business and food production.
- The health directorate will secure any medical check-up required in order to accommodate children in the shelters.

6.6 Homeless People Remedial Actions:

Homeless people with mental disability

- In full cooperation with Health Directorate, they will be sent to hospital. They will be tested by Health Directorate and based on the medical check-up report they will be sent to the psychiatric hospital in Cairo.
- Alternatively, they will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be provided with blankets, food, water and medication by the initiative.
- They will be informed about the project impacts and the necessity to evacuate the construction site.

Homeless people who have no accommodation

- A Memorandum of Understanding will be signed with NAT, Health Directorate and Security department to provide the homeless with required support
- They will be supported by Social Solidarity directorate “ Children and Homeless People Without Shelter Initiative”. They will be provided with blankets, food, water and medication by the initiative.
- They will be informed about the project impacts and the necessity to evacuate the construction site.
- Robust stakeholder engagement programme with them to explain construction activities, schedules and grievance mechanism will be implemented.
- Vulnerability assistance: Additional vulnerability assistance can be provided in form of food, medication. Etc by the project or by the NGOs e.g. Resala, Caritas, Misr El Kheir

6.7 Valuation of compensation and transitional support

The process of valuation will be based on the following aspects:

Table 6-1: Valuation of compensation and transitional support

| Eligible Groups | Entitlement | Valuation process | Responsibilities |
|----------------------------------|--|---|---|
| Tenants of APTA Shops and Kiosks | Tenancy fees of alternative shops for three months | The tenancy fees of alternative shops were based on the current market value that was shared by the broker and found on real estate website (Aqar Map). A list of average shops is included in Annex 11. | The RPF consultant provided a list of alternative tenancy fees within the same neighbourhood for the shops of the same area (10-meter square – 40+ meter square) (see Annex 11). The list will be provided to NAT and the CC as well. These will be used as sole source by the CC (it is mandatory) |
| | Revenue of the shop | Tax register was not a reliable valuation document as almost 90% of the shops have no tax register. Additionally, all consulted tenants reported that the tax register includes inaccurate information. The revenue of the shop was calculated based on the type of the shop, similar activity revenue (as reported by the PAPS) and the size of shop. The vulnerable groups (who earn less than 2,500 EGP per month will receive about additional 50% of their revenue for three months (7,500 EGP + 3,750 = 11,250 EGP) | The RPF consultant shared an average revenue of similar shops after excluding all operation cost. (please see Annex 17). This average was reported by the PAPS. These will be used as sole source by the CC (it is mandatory) |
| | Items and objects located inside the shop and will be affected | For the items and objects that can not be relocated, compensation of the affected asset can be provided. The market value can be obtained from the suppliers of each item. | NAT in full cooperation with the CC will value the affected assets through contacting the suppliers of assets. |
| | Cost of moving the goods to alternative shop | NAT will add the cost of moving goods to the compensation. The estimated value is about 800-1,000 EGP based on the type and quantity of movable items. | NAT will calculate the compensation of moving goods |

| Eligible Groups | Entitlement | Valuation process | Responsibilities |
|---------------------|--|--|--|
| | Painting and decoration cost of the alternative shop | Based on the market value of painting one meter of concrete structure to be obtained from a construction firm in Alexandria e.g. Alex for Constructions. | NAT will ask a firm to provide this information. |
| Workers | Monthly salary for three months | Workers with official contract: The monthly salary of those who have official contract is mentioned in the contract. | The CC and NAT will provide them with the compensation. |
| | | Workers with no official contract and casual workers: Those who have no contracts and casual workers will provide any proof of their salary. | The CC and NAT will provide them with the compensation. |
| | | A list of employment websites and contact has been prepared and will be shared with all workers (no cost is required) Annex 14. | The CC and NAT will provide them with the compensation. |
| Trees | Affected non-fruitful trees | The valuation of trees will be based on the agriculture directorate price lists (updated ones should be included in the RAP). | The CC and NAT will provide them with the compensation based on the price lists to be provided by the agriculture directorate. |
| Religious structure | Mosques | Ministry of Endowments (MoE) is the sole entity responsible for valuation of mosques with no interference from any other entity. | NAT will deposit an amount of money to MoE. The exact amount will be mentioned in the RAP. |
| Street children | Accommodation cost | Social solidarity will accommodate children in public shelters with no cost. | NAT will cooperate with the social solidarity directorate. |

| Eligible Groups | Entitlement | Valuation process | Responsibilities |
|--|--|---|--|
| Tenants/ owners of the shops who may potentially lose their income in the event of complete loss of access | Monthly revenue of the shop until the shop is opened | Tax register was not a reliable valuation document . Additionally, all consulted tenants reported that the tax register includes inaccurate information. The revenue of the shop will be calculated based on the type of shop, similar activity revenue (as reported by the PAPS) and the size of shop. | NAT in full cooperation with the compensation committee will be responsible for valuation of the revenue. |
| Employees of the shops that may be temporarily closed | Monthly salary of workers until employees are able to find alternative employment or restore their income levels to pre-impact levels. | Based on the payroll of workers, the compensation will be valued. | NAT in full cooperation with the compensation committee will be responsible for valuation of the salary/wage of the workers. |

7. PUBLIC CONSULTATION AND DISCLOSURE ARRANGEMENTS

7.1 Legal Framework

7.1.1 National Regulations

Engagement of project affected persons is not required by the Egyptian legislations. However, Law No 4 of year 1994 insists on carrying out public consultation where various stakeholders are invited to, including the project affected people. All project impacts are presented in the public consultation.

7.1.2 International Requirements

7.1.2.1 EIB Environmental and Social Standards - Standard Number 10: Stakeholder Engagement

Standard 10 requires promoters (project implementers) to maintain an open, transparent, and accountable dialogue with all project-affected persons, communities, and other relevant stakeholders in an effective and appropriate manner. The value of public participation in the decision-making process is stressed throughout the preparation, implementation and monitoring phases of a project. Stakeholder Engagement Standard 10 emphasized the following:

1. A meaningful engagement process 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. The views, interests, and concerns of project affected communities and other interested stakeholders are heard, understood, and taken into account throughout the project lifecycle.
2. Standard 10 outlines a systematic approach to stakeholder engagement that the promoter is expected to build and maintain by way of a constructive relationship with relevant stakeholders. Stakeholder engagement is an inclusive and iterative process that involves, in varying degrees, stakeholder analysis and engagement planning, timely disclosure and dissemination of/access to information, public consultations and stakeholder participation, and a mechanism ensuring access to grievance and remedy.

7.1.2.2 Guidance note for EIB Standard on Stakeholder Engagement in the EIB Operations October 2020

The EIB sustains the following rights: (i) public access to information; (ii) access to public consultation in decision-making; and (iii) access to justice. International law reflects similar, complementary, requirements. These rights, and how they apply in the context of EIB-financed projects, are set out in Standard 10 of the EIB's Environmental and Social Standards.

The purpose of this Guidance note is to provide recommendations to promoters on how to meet the EIB's requirements regarding stakeholder engagement in EIB operations. It also summarises good practices for meaningful stakeholder engagement to help promoters maximise potential project gains.

The Guidance note in itself is non-binding and is to be used in conjunction with Standard 10. If there is any inconsistency or conflict between the Guidance note and Standard 10 or any of the EIB's other Environmental and Social Standards, the provisions of the Standards prevail. The Guidance note may be updated occasionally in line with how policies and practice related to stakeholder engagement evolve.

7.1.2.3 The World Bank ESS 10 related to Stakeholder Engagement and Information Disclosure

This ESS sheds light on the importance of applying meaningful stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. Making available project-related information as early as possible in the project cycle and in a manner, format, and language appropriate for each stakeholder group is important. Formats to provide information may include presentation printouts, nontechnical summaries, project leaflets, and pamphlets. Ideally, maps of the project area and nontechnical drawings will be included in the materials. Documents used in stakeholder consultation will be made available to stakeholders.

Documentation should also be accessible for stakeholders with sensory disabilities, for instance, through providing documents in Braille or engaging a sign language interpreter at a consultation meeting, as appropriate.

In cases where literacy levels are low, additional formats like location sketches, physical models, and film presentations may be useful to communicate relevant information. The Borrower should help the public to understand technical documents, for instance, through the

publication of simplified summaries, nontechnical background explanations, or access to local experts.

Special efforts will be exerted to inform, engage with, and understand disadvantaged or vulnerable groups with regard to the impacts of the project on them, the means of obtaining access to compensation and benefits where appropriate, and how and when to raise grievances.

It is important to remain responsive to requests for information from project-affected parties and other interested parties throughout the project cycle. It is helpful to set up appropriate systems to make project information available on a continuous basis. For instance, a website or other media may be useful to provide, and regularly update, project-related information.

7.2 Consultation Activities During RPF preparation

The Project managed to carry various stakeholders' engagement activities with the stakeholders and the PAPS. Out of 91 shops, the Project surveying team has met with all of them in their premises with the help of APTA. The team also met with street vendors, Caritas, social solidarity and drivers.

The Project surveying team has discussed the entitlement matrix with various categories. Their input was included in the entitlement matrix and discussed with NAT and APTA. Thereafter, the discussion was escalated to lenders. The discussion continued about entitlement for three continuous months starting from October 2021 until December 2021.

The consultation activities carried out to date are as follows:

Table 7-1: Previous Stakeholder Engagement – Preparation of the RPF and updating the ESIA

| Consulted Groups | Number | | Methods | Date |
|---|--------|--------|---------------|------------|
| | Male | Female | | |
| Caritas NGO | 1 | 2 | Meeting | 20/11/2020 |
| APTA, Head of Central Division for Tram Affairs | 6 | 1 | FGD (Annex 5) | 29/12/2020 |
| Shops tenants | 72 | 8 | Questionnaire | 12/2020 |
| Workers in the Shops | 18 | | Structured | 12/2020 |

| Consulted Groups | Number | | Methods | Date |
|--|--------|--------|-------------------|---------------|
| | Male | Female | | |
| | | | questionnaire | |
| Governorate Authority and Governmental units | 21 | 10 | Meeting (Annex 5) | 19/01/2021 |
| NAT (Project Engineer) | 3 | | Meeting (Annex 5) | 14/01/2021 |
| NAT (Real Estate Department & Environmental Manager) | 3 | 1 | Meeting (Annex 5) | 24/01/2021 |
| Shop tenants (updated tenants based on the list of tenants provided in August 2021) | 9 | | Questionnaire | November 2021 |
| Workers in the shops (second consultation with current workers) | 37 | 2 | Questionnaire | November 2021 |
| Street vendors | 7 | 1 | Meeting | November 2021 |
| Shop tenants' additional consultations about entitlement matrix | 13 | | Meeting | November 2021 |
| Microbus and Tuk tuk drivers | 26 | | Meeting | November 2021 |
| Caritas NGO | 1 | | Call meeting | November 2021 |

The above-mentioned consultation activities will be supplemented by additional activities in order to share information about eligibility, entitlement, compensation scenarios and the grievance mechanism during the preparation of the RAP. The discussion will start by NAT and the compensation committee, as well as the RAP surveying team.

The main findings of the abovementioned consultation activities can be summarized as follows:

Table 7-2: Main Outcomes of Consultation Activities to Date

| Subject | Comment raised by | Questions and Comments | Response |
|----------------------------------|---|---|---|
| Impacts of the project | Housing department in Alexandria and the district authorities | Will the project affect any residential houses? | <p>The Tram will not affect the surrounding houses, particularly, due to not implementing deep excavations rather than the ones close to the viaducts.</p> <p>However, the contractor will monitor the houses prior and during construction activities.</p> <p>In case of any unforeseen damage, the contractor will be responsible for repairing or compensating for the damage.</p> |
| Provision of compensation | All consulted groups | Will the project provide any compensation for the PAPs? | <p>A detailed entitlement matrix is being developed and discussed with the majority of the PAPs, NAT, APTA social solidarity directorate, Caritas NGO and the lenders.</p> <p>The final entitlement matrix will be disclosed to the PAPs upon approval of the RPF and during the preparation of the RAP.</p> |

| Subject | Comment raised by | Questions and Comments | Response |
|--|--------------------------------|--|---|
| APTA compensation | APTA staff | APTA will lose their source of revenue they gained from the shops, will they be eligible for compensation? | APTA is a governmental entity responsible for operating the tram. They pay operational costs. However, the ticket they collect and the shops lease cost cannot cover operational costs. Therefore, APTA will not lose their income but their operational cost will decrease |
| Impacts on drivers, maintenance staff, and conductors | APTA staff | Will the drivers, maintenance staff, and conductors be affected? | They are all permanent governmental staff. They will continue working in the other trams. It is the responsibility of APTA to reallocate these people |
| Other impacts | All consulted groups | Will the project affect the air conditioner units installed outside houses close to the current tram way? | The fence will avoid air conditioner units installed outside the houses. Consequently, the air conditioners will not be affected. Based on NAT experience with similar projects in Cairo, air conditioners were not affected. |
| Street children | Caritas and district authority | Will the project adopt any strategy to eliminate street children from the sites and stations? | The project will consider all categories including street children and homeless people. Communication with the Ministry of Social Solidarity will take place to properly accommodate these categories. |

| Subject | Comment raised by | Questions and Comments | Response |
|-----------------------------|-------------------|--|--|
| Compensation value | Tenants of shops | The tenants who leased shops from APTA 20 years ago were concerned that the compensation value will not enable them to restore their income, particularly as the renting fees of alternative shops will be much higher than the current shops. | The compensation committee will discuss with the PAPs about the best approach to support them restoring their income. Not only compensation will be provided but also technical assistance and guidance. |
| Traffic diversion | Microbus drivers | Will be any traffic diversion activities? | There will be traffic diversions according to the traffic plan. It will be disclosed to all people and drivers. |
| Tariff of microbuses | Microbus drivers | Will the tariff of microbuses increase during the construction phase due to the traffic diversions? | The tariff will not be changed, unless the government will decide to. It is worth mentioning that the diversions will be limited as the alternative streets are limited in Alexandria governorate. The microbuses can't raise the tariff as any unjustified increase in the prices of the alternative means of transportation will add burden to the community people |
| New microbuses stop | Microbus drivers | Will the Project secure new microbuses' stop during operation phase? | The Traffic Authority in Alexandria has not determined this matter. Upon deciding whether to provide new stops, the Project will inform the drivers. |

| Subject | Comment raised by | Questions and Comments | Response |
|---|---------------------------|--|---|
| Probability of not rehabilitating the stations | Tram tenants of the shops | The tenants reported that they have been working at Tram stations for long time (more than 30 years) they asked if there is any probability to retain the stations and upgrade the rails only. | The Project will rehabilitate both the stations and the rails as well as the tram wagons. There is no room to retain the stations and they should be rehabilitated |
| Compensation value | Tram tenants of the shops | What is the exact value of compensation? | The exact value of compensation will be determined by a compensation committee that will be formed of NAT, APTA, governorate representatives. No values can be reported for the time being. |
| Renting fees of the alternative shops value | Tram tenants of the shops | What is the proposed tenancy fee of the alternative shops? | The Project has investigated the prices of shops in similar neighbourhoods located in the immediate vicinity of the shops. A long list of prices was developed and will be shared with the tenants. It is strongly recommended to choose the alternative shop based on specific determinants e.g. being close to commercial areas, reasonable tenancy cost and accessible by the clients |

| Subject | Comment raised by | Questions and Comments | Response |
|---|---|--|---|
| Compensation with alternative owned shop | Tram tenants of the shops who leased their shops more than 20 years ago | The tenants of the tram shops leased their shops more than 20 years ago. They pay extremely low tenancy fees. Will the project provide them with alternative shops either owned or leased under Old Renting Law 136 of year 1981 ⁵⁹ | <p>To provide an alternative shop is relatively difficult due to the diversity of shops available and the tenancy should be suitable to the tenant financial status. Accordingly, no alternative shop will be provided.</p> <p>Regarding providing owned shops instead of rented shops, this will not be consistent with both national and international regulations.</p> <p>Regarding providing old renting shops, this is not viable as the majority of shops are leased according to new renting law No 4 of year 1996 that leases the shops for a limited period (no more than 2 years)</p> |

⁵⁹ Old renting law No 136 of year 1981 enabled tenants to lease their unit for more than 59 years. The value of tenancy is limited and increased by 5% each 5 years. This law also guarantee the righ of tenants to inherit the unit to their children and grand children

7.3 Consultation Activities During RPF Preparation

The project, in compliance with the requirements of Law No 10 of year 1990 and its amendments, EIB standard 6 & 10 and WB ESS 5 & 10, pays attention to the disclosure of all information related to the project activities and potential impacts:

- Prior to the RPF preparation, various meetings were conducted with the governmental entities (Governorates and Districts) to inform about the potential impacts of the project and the PAPS categories.
- During the RPF preparation and data collection: The Project data collection team met with all affected people (including street vendors and workers) and develop a photo log for each asset (see Annex 16). They also consulted with all of them about the following:
 - Project impacts and the necessity to demolish 117 shops located inside the stations;
 - Remedial actions including entitlement and livelihood restoration aspects of various groups;
 - Grievance mechanism and contact information;
 - Valuation methodology;
 - Rationalization and feasibility of alternative shop tenancy;
 - Their concerns and proposed corrective and remedial support; and
 - The time line of resettlement.

7.4 Engagement during RAP Preparation Phase

After issuing the Public interest decree NAT will be ready to prepare the Resettlement Action Plan. The following consultation activities will take place .

During RAP final data collection process that will be carried out by Housing Survey Department, NAT, Compensation Committee members and the governorates in full cooperation with the RAP consultant will share information with the PAPs, particularly illiterate people in simple Arabic language. Information to be provided will cover the following topics:

- The project impact and potential impacts on the assets
- Remedial actions including entitlement and livelihood restoration aspects of various groups;

- Grievance mechanism and contact information;
- Final valuation methodology;
- Time schedule

It is noted that during the preparation of the RPF, PAPs were consulted on the compensation approach, entitlements, time plan, requirements of funding agencies and the proposed compensation approach to be applied to meet the full replacement cost requirements.

The RAP, after being cleared by the Lenders and approved by NAT, will be translated into Arabic and publicly disclosed to all stakeholders and PAPs through sending copies to the Districts Authorities (Sharq- Wasat and El Montazah and the Governorates. The RAP will also be disclosed on the NAT website.

A summary of the needed lands were disclosed in the Egyptian Gazette in December 2022 as the Public Interest Decree has been issued . A leaflet will be prepared about the RAP. Such leaflet will be disseminated to the PAPs in the local language. The main contents of such leaflet will be:

1. Information about the project
2. Information about the adverse impacts
3. Eligibility and entitlements,
4. Grievances mechanism and NAT CLO's contacting information

7.5 Engagement during RAP Implementation Phase

- The tenants of the properties and holders of rights therein will be informed about the implementation schedule during the project implementation phase. They will be notified by the Governorate Authority (Housing Survey Department) and NAT Compensation Committee. The notification memo will be provided to them **in a written form or verbally** when households are illiterate. All process will be documented and reported to the Lenders in order to verify the implementation.
- Disclosure of information in the Districts and the Governorates premises.

7.6 Grievance Management

The Community Grievance Mechanism (CGM) allows stakeholders to submit complaints and comments at no cost, without retribution.

7.6.1 NAT 's Current Community Grievance Mechanism

NAT has a wide experience with EIB and AFD financed projects. Accordingly, NAT has an existing grievances committee for the Cairo Metro Line project. The process of receiving and managing grievances is shown in the flowchart in the figure below. Grievances are received through various channels:

- Engineering representative on-site
- NAT Website
- Direct mail to the Chairman of NAT
- Telephone calls (Landline)
- Personal meetings
- Handovers to the grievances committee
- Legal Affairs Department in NAT
- The Governmental Complaints Portal www.shakwa.eg (16528).

The response to grievances normally takes about 30-45 calendar days. However, there is no time interval to solve the complaint. This is not in line with the EIB/WB/ AFD requirements.

In some cases, grievances are channelled directly to the concerned department but in the majority of cases, the grievances committee is notified with the grievances. NAT has no centralized registry of all grievances rather than the governmental portal. The following procedures are followed:

1. The Grievances Committee or NAT Archive Unit receives the complaint
2. The Grievances Committee directs the complaint to the concerned department or to the engineering department for investigation
3. The complaint and the investigation report are routed back to the grievances committee, where a report is prepared and raised to the decision-making authority
4. If the aggrieved person is eligible for compensation, compensation procedures are followed. Alternatively, the response will be shared with the aggrieved person.

Grievances related to interruption of economic activity require a lot of time to be resolved. This is mainly because they require determining a fair compensation, which is usually based on the PAPs tax records. Most of the PAPs might be obliged to wait until their financial year is closed in order to be able to get their tax record that is required by the compensation committee. They prefer to submit updated tax records in to order to reflect their updated revenue.

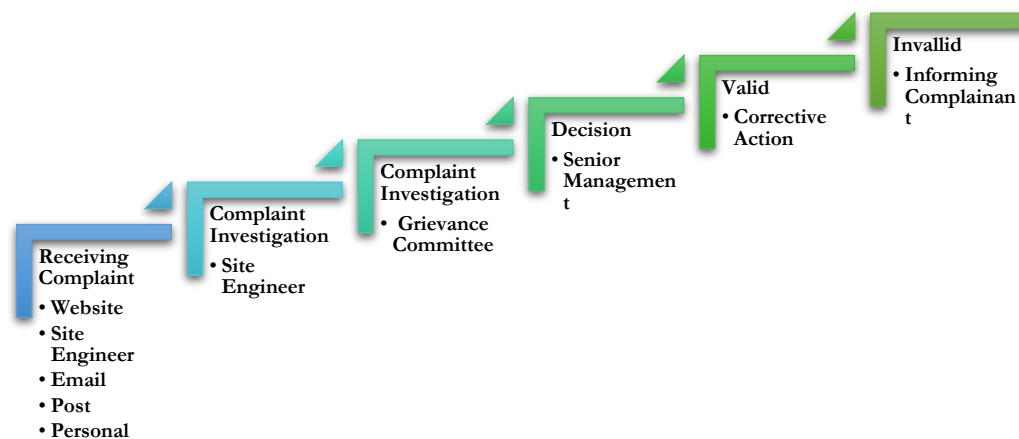


Figure 7-1: NAT Current Community Grievance Mechanism

Source: NAT 2021

The CGM applied by NAT sets focus on two types of grievances:

- **Grievances received from the Governmental Complaint Portal**
There is an assigned staff member who follow up with the complaints received from the portal. The aggrieved person is replied to within 72 hours in order to inform him/her about the recipient of grievance and how it will be managed. The solution of complaint is mainly based on its severity and complexity.
- **Grievances related to compensation and livelihood restoration impacts**
These complaints might be sent to the: 1) contractor, 2) by phone, 3) on the website, 4) by hand in NAT, 5) the Ministry of Transport. The complaints are managed by a committee formulated particularly to manage and solve complaints related to compensations and involuntary resettlements. Such grievances are managed carefully as the aggrieved person should restore his/her living conditions. The same aggrieved person has the full right to submit his complaint more than once in order to reach the

acceptable compensation. The aggrieved person has the full right also to raise his complaint to court.

With regards to other grievances that might originate due to closure of access to other shops, damaging of infrastructure ..etc, they are managed by the same committee.

All grievances activities will be monitored in order to verify the process. Monitoring will be for the following indicators:

- Number of grievances received monthly (channel, gender, age, basic economic status of the complainants will be mentioned)
- Type of grievance received (according to the topic of the complaint)
- Number of grievances resolved
- Dissemination activities undertaken.
- Satisfaction with the solutions (where evidence is available in writing, but this should not be a value judgment of the focal point)
- Documentation

7.6.2 Proposed Community Grievance Mechanism

The grievance mechanism must be fine-tuned as reported in the updated ESIA and the Stakeholder Engagement Plan. The developed Community Grievance Mechanism will be applicable throughout all project phases namely, pre-construction, construction and operation. NAT also should be trained about how to apply proper GM that meets the international standards. For example, the confidentiality, being sensitive to gender and having proper monitoring and management time frame.

This mechanism is unified and will be applied during all Project phases.

1. During construction phase: the contractor will be responsible for the CGM
2. During operation phase: the operator will be responsible for the CGM
3. NAT will oversee and monitor the efficiency of the CGM

The key principles and overview of an effective CGM as adopted by the Project are:

- **Culturally appropriate** - tailored to local culture, language and literacy level
- **Gender sensitivity**: transparent and fit for men and women

- **Accessible** – accessible to all community members
- **Inclusive to vulnerable groups** – available to those less likely to have the means to voice their concerns or opinion within the local context
- **Reliable** - Project commitment to respond to grievances within agreed upon timeframe
- **Publicised** – all stakeholders are made aware of the CGM through stakeholder engagement activities
- **Logged** – all grievances are logged and tracked
- **Confidential** – grievances will remain confidential with an option of anonymity

The Community Liaison officer (CLO) will lead the implementation of the CGM. Therefore, he/she will refer the grievance to the interested entity to solve. He/she will be responsible for documentation and monthly reporting to NAT.

At the outset, the Project contractor will disclose/ communicate the CGM to the local communities via the following methods in accordance with the local context (to be confirmed in consultation with the community by the Social Consultant):

- Stakeholder Engagement Activities
- CLC Meetings
- Project webpage
- Noticeboards at Local Governmental Unit, Youth Centres and NGOs
- Local Media
- Governmental Complaint Portal (<https://www.shakwa.eg/GCP/Default.aspx>)
- National Authority for Tunnels (complaint channels)
- Alexandria Governorate complaint channels
- Complaint Committee Contacts (**to be determined**)
- Phone calls and WhatsApp messages (**to be determined**)
- The contacts of NAT are listed below:
 - **Land line: + 02 25742968**
 - **FAX+02 5742950**
 - **Email address infoc@nat.org.eg**
 - **Postal address Ramses Square Ramses Complex- Cairo- Arab Republic of Egypt- ZIP: 11794 p. B 466**

The GM will include the steps listed below and elaborated in subsequent sections:

1. Receiving Grievances

2. Registering Grievances
3. Acknowledgement of Grievances
4. Screening and Classification of Grievances
5. Addressing Grievances
6. Communication of Grievance Resolution Process
7. Implementation and Final Closure

7.6.2.1 Step 1 – Receiving Grievances (Day 0)

The following options will be available to stakeholders for submitting grievances to the Project:

- Face to face with CLO during stakeholder engagement activities
- Submit via dedicated email address
- Verbally to CLO via phone
- Grievance boxes at key community locations to be determined in full cooperation with the Steering Committee in consultation with NAT and the contractor.
- The Governmental Complaint Portal

Upon receipt of the grievance at the originating point the receiving party has a maximum of three days to forward the respective grievance to the CLO. All complaints whether received directly by the CLO Manager or via another route will be collated and handed centrally, actioned and closed out. The CLO will lead this process. Grievance boxes will be checked on a weekly basis by the CLO.

7.6.2.2 Step 2 – Registering Grievances (Day 3)

All grievance received will be formally registered by the CLO using the Project Grievance Form and summarised in the Community Grievance Register (included in the SEP DMS in Annex 1), ensuring that contact details are provided with the preferred method of communication. A clear description is also required to be provided of the grievance. Anonymous submissions will also be accepted.

7.6.2.3 Step 3 – Acknowledgement of Grievance (Day 5)

Within 48 hours from registering the grievance, the CLO will acknowledge to the complainant that the grievance has been received and registered as a legitimate complaint that can be handled by the Project. This is likely to be through a phone call, in person visit or in written

format as determined most appropriate. Where possible, information will be provided to the complainant on the next course of action as well as an indicative timeframe for resolution. The CLO will track progress of grievance investigation and resolution and keep the complainant informed as necessary.

If the grievance is not registered as a legitimate complaint, the complainant will be informed and the grievances closed out. If the complainant does not agree they can seek External Recourse.

7.6.2.4 Step 4 – Screening and Classification (Day 7)

All grievances will be screened to determine if they are a legitimate complaint. Non-legitimate complaints could include: complaints which obviously are not related to the Project, criminal activity not related to the Project, labour related grievances (refer to workers' grievance mechanism as mentioned in Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) Section), contractual disputes (use redress methods in contracts), issues related to government policy or procedures (the complainant should be directed to the relevant routes). If required, the CLO will identify the support of an internal investigation team with the correct skills to further investigate issue raised and to decide whether it is Project related or whether it is more appropriately addressed by a third party (e.g. relevant authority, other company).

Once determined a legitimate complaint, each grievance will be reviewed, assessed and classified into one of the following categories:

- **Minor Social Incident or Minimum Priority Complaint** – Level 1: a local, isolated and one-off complaint which could be addressed with limited effort. They are small in nature and do not threaten the prevailing situation the complaint is registered for. Usually, they are generated and motivated with individual interests.
- **Medium Social Incident or Medium Priority Complaint** – Level 2: widespread and/or ongoing complaints. It's widespread in nature, probably affecting more than one person or groups. It has the potential that, if not addressed, may escalate into a major social incident. (e.g. noise, vibration and dust during construction).
- **Major Social Incident or Critical Priority Complaint** – Level 3: potential for significant breach of the applicable legislation, international standard, company

policies, and/ or negative media attention, safety and security of the Project site, employees and stakeholder (e.g. abuse by security force).

The CLO will then assign a type to each grievance as per the following categories:

- Compensation
- Livelihood/income
- Environmental concern (to be defined)
- Injury
- Employment
- Property damage
- Security forces abuse
- Employee/Sub-contractor bad behaviour
- Non-fulfilment of Project commitments
- Cultural heritage

7.6.2.5 Step 5 – Addressing Grievance (Day 8)

The CLO with support from other relevant Project personnel will:

- Identify required action for resolution of the grievance as well as responsible person/party. If unable to deal with grievance directly, the CLO will assign it to the appropriate Project personnel for resolution (ideally to a head of a unit). The identified personnel will assist the CLO in the resolution of the grievance.
- If necessary to address the grievances, the CLO can perform a field visit and/or hold additional consultation meetings.
- Identify activities, procedures, equipment and training to address and prevent reoccurrence.
- CLO remains responsible for tracking the grievance through to closure

7.6.2.6 Step 6 – Communication of Grievance Resolution Process (Day 20)

The CLO will communicate the outcome of the grievance resolution process to the complainant and request feedback (if possible) on the resolution. They will make sure all grievances are responded within 15 days from being acknowledged. All grievances of a Level 3 – critical priority will be responded to within 72 hours. Responses shall be in writing and a verbal response will also be provided where appropriate. If the complainant agrees,

they should sign the grievance resolution form. If the complainant does not agree they can seek external recourse.

7.6.2.7 Step 7 – Implementation and Final Closure (Based on required corrective measures)

The CLO and the responsible personnel identified for resolution, shall ensure that the grievance resolution is effectively implemented in an efficient and timely manner. The CLO shall inform stakeholders on the progress of implemented corrective actions. When no further attention is required then the CLO will close the grievance and record close out date in the Grievances Register (included in the SEP DMS in Annex1). For Level 3 Grievances, the CLO and the NAT E&S Manager will close out the grievance together. The Project will aim to close all grievances within 30 days of receiving the grievance. The Project will guarantee anonymity in all external reporting.

7.7 Record Keeping

Record keeping will take the following form:

- An electronic and hard copy filing system for all external relations activities
- Recording issues raised at meetings and distributing the report to attendees for verification at regular intervals
- Attendance registers completed at all meetings, and taking digital photographs and/or video recordings at meetings as required/possible

Keeping a comprehensive record for reporting purposes of:

- All meetings (dates, venues, attendees, objectives, outcomes)
- All events such as launches, open days etc. (dates, venues, attendees, objectives, outcomes)
- All comments, compliments, grievances and responses to these
- Times and content of media advertisements, radio broadcasts

7.8 Documents for Disclosure

At the inception phase of the project, the following management plans will be publicly disclosed:

- Occupational Health & Safety Guidelines;
- Grievance Mechanism Procedure;

- Waste Management Plan;
- Waste Water & Sewage Management Plan; ZLD technique
- Workers' Accommodation Strategy;
- Traffic Management Plan;

The grievance mechanism will also be integrated in orientation footage to all workers, to ensure that all stakeholders are aware of both the internal and external grievance mechanisms.

7.9 Monitoring of grievances

Monitoring refers to the process of tracking grievances and assessing the extent to which progress is made to resolve them. All grievances activities should be monitored in order to verify the process. All information related to contact, cases, tracking and monitoring of feedback/grievance shall be tracked through a database created for this purpose.

The database shall be managed by the CLO, updated and shared with NAT E&S manager on a monthly basis. All files shall be protected to ensure no loss of data and information.

Ultimately, the CLO will be responsible for consolidating, monitoring and reporting on the total number of complaints, enquiries and other feedback that has been received, resolved or pending.

Information compiled by the CLO will be essential for reporting progress of the project's grievance indicators (i.e.: number and percentage of grievances registered that are addressed), that are included in the Periodic Report on a quarterly basis.

7.10 Confidentiality

Individuals who submit their comments or grievances have the right to request that their name should be kept confidential, though this may mean that NAT CLO will be unable to provide feedback on how the grievance has been addressed. However, an anonymous complaint can receive a code and should be investigated appropriately and treated courteously.

The aggrieved person can submit anonymous complaint. However, he/she should inform about the acceptable channel for communication that can be used to share information with him/her about the corrective measures.

7.11 GM Sensitive to Gender

The GM will provide women with a suitable avenue to lodge grievance (via the grievance mechanism or suitable human resources systems) related to sexual, physical, raping or emotional harassment of women. This includes access and links to Gender-Based- Violence support groups functional in the area. In order to properly encourage women to report and complaint on any GBV related issues, the project will:

- Allow women to submit anonymous complaints.
- Maintain all information about aggrieved women as of high confidentiality
- Not be allowed to escalate for any complaints without prior written approval
- Not share any information about the aggrieved women even with her own close relatives

The female CLO will pay visit to the aggrieved person to her house in order to give her a sense of safety.

NAT, via the social safeguards and gender specialists will provide training and sensitizing of all construction and operation contractors, goods and service providers, as well as the supply chain. The training should be gender oriented in order to minimize any complaints related to gender-based violence.

The project grievance mechanism must be gender-sensitive, particularly, due to the conservative nature of the community. It is a standard of good practice that aims to provide a separate female contact point for complaints to be received from women. In cases of increased risk of discrimination, harassment, rape or assault (for example, where a worker camp is near a community), the GM ensures that women subject to physical or sexual abuse, or rape, can file confidential complaints.

It is entirely up to the survived women to decide whether to escalate the case to court or remain it within the female CLO and the aggrieved women.

7.12 Procedure for Appeal

All community people, including women, have the right to appeal the complaint that they have submitted to the project GM. GM users who are dissatisfied with the outcome of their complaint can resubmit their complaint to the CLO within 30 working days of receiving a response to the earlier case they had submitted. The final option for the GM user is to go to court.

The Egyptian Court system is composed of a number of tiers: The Courts of First Instance, Court of Appeal and the Court of Cassation which sits at the apex of the judiciary. The classical dichotomy of public and private law has resulted in the establishment of the Council of State (*Conseil d'Etat*), which consists of administrative courts vested with the power to decide over administrative disputes pertaining to administrative contracts and administrative decrees issued by government officials and public law entities.

8. MONITORING AND EVALUATION

8.1 Overview

The objectives of monitoring the land acquisition, compensation and resettlement process by NAT will be to:

- to provide feedback on land acquisition, compensation and resettlement implementation in order to allow the timely adjustment of implementation arrangements; and
- to demonstrate that the land acquisition, compensation and resettlement process is being managed in line with objectives and desired outcomes.

The resettlement process will be monitored by ANT through:

- an internal monitoring system undertaken by the NAT environmental department manager and reported to the chairman on quarterly basis.
- an external monitoring system operated by an independent third party consisting of external audits.

This section provides an introduction to the key elements of the monitoring plan that will be required. A detailed plan will be developed by NAT during the preparation phase of the resettlement. The RAP Monitoring Plan will outline in detail the organizational responsibilities, the methodology, and the schedule for monitoring and reporting.

The Monitoring Plan should consider the following in relation to the different monitoring components (internal monitoring and external evaluation of monitoring data and compliance reviews):

- Responsible parties;
- Activities to be undertaken;
- Frequency and timeline of activities;
- Indicators or criteria to be used to demonstrate progress, effectiveness and/or compliance; and
- Reporting requirements.

8.2 Internal Monitoring

Egyptian regulations do not offer any monitoring or evaluation measures. Yet, the WB and EIB standards require monitoring and evaluating the social and economic impact on the PAPs. It requires measuring the amounts of compensation paid, livelihood restoration activities, time taken to ensure compensation payment and relocation, number of grievances and redress cases received and addressed and objective feedback on the overall impact of the resettlement action on the affected group.

The NAT Compensation Committee in full cooperation with the CLO of NAT must have the upper hand of monitoring activities to be implemented under the RAP process during all its phases. The committee has not been formed to date.

They will be responsible for ensuring efficient consultation with all PAPs, their representatives, proper implementation of the compensation process and its effects on the PAPs socioeconomic status (that might be affected due to the project implementation). This will not be reflected on the financial cost as it is part of NAT activities. In addition, they will be responsible for the following:

1. Document the census developed by the RAP
2. Document the minutes of meetings with the governmental entities
3. Document all grievances and petitions received
4. Document the PAPs who received their compensation and those who did not
5. Receipts signed by the PAPs will be tracked and recorded
6. Obstacles and barriers faced and how they were solved
7. Develop monthly and quarterly reports

Based on similar projects carried out by NAT during the previous decade, NAT has limited access to the above-mentioned documents. However, NAT can have access to these documents through two levels. The first is through the high steering committee of the Project. The second is through being part of the compensation committee that has access to all documents. Alternatively, NAT can have a monthly meeting of all entities participating in the compensation committee. This monthly meeting aims to share all documents, minutes of meetings, receipts ...etc.

In order to facilitate auditing missions to be applied along the life of the project, all documentations will be handled in a professional and systematic way. The capacity of the

Compensation Committee to keep records of all needed administrative documents is still an issue. Thus, they will be assisted by an independent consultant, at least for the first year.

8.3 External Monitoring and Evaluation

With regards to this project, an independent consultant should work in cooperation with the Compensation Committee and NAT in order to apply various monitoring activities required. An independent consulting firm will be contracted by NAT in order to evaluate the activities done under the RAP, as well as assess the impact of involuntary resettlement on the livelihood of PAPs. ToR of this consultancy will have to receive no objection from the lenders. This exercise will be done during mid of the implementation process. The purpose of this evaluation is to provide guidance for NAT in case of facing any obstacles that might affect the implementation of the RAP towards attainment of its objectives.

NAT will also commit to providing all data needed to apply the mid-term evaluation and final assessment. The needed data is:

- List of affected people
- Type of compensation/ assistance provided
- Consultation documents
- Letters sent to the PAPs
- Signed documents that reflect the recipient of compensation

Evaluation aims at ensuring that the policies adopted comply with the funding agency rules and regulations and should provide feedback needed for adjusting strategic directions. The evaluation has the following specific objectives:

- General assessment of the compliance of the implementation of resettlement activities with objectives and methods as set out in this RAP,
- Assessment of the compliance of the implementation of resettlement activities with laws, regulations and safeguard policies as stated above,
- Identification of actions to take as part of the on-going monitoring to improve the positive impacts of the program and mitigate its possible negative impacts, if any.

Once the implementation of the resettlement process will be completed an independent consultant will be hired by NAT to evaluate the whole process of the RAP in the form of a **RAP closure audit**, in addition to providing a full assessment for the activities done, including documentation, grievances mechanism, valuation, entitlement and the lessons learned. ToR of this consultancy will have to receive no objection from the lenders.

This independent consultant will be responsible for developing a **Final Evaluation Report** by the one year after the completion of the resettlement process.

8.4 Indicators to Be Used for Internal and External Monitoring

Following are some of the indicators to be measured during the internal and external monitoring and evaluation process:

Table 8-1: Examples of the proposed aspects needed for internal and external monitoring and evaluation activities

| Aspects | Means of Verification | Source of Information |
|---|--|--|
| Efficiency of Valuation Process | <ul style="list-style-type: none"> ○ Methods adopted in evaluating the assets, lands, income restoration ○ Capability of the valuation committee ○ Complaints related to the valuation segregated by governorate and type of impact ○ Minutes of engagement activities with the PAPs ○ Satisfaction of PAPs with valuation procedures | <ul style="list-style-type: none"> ○ Valuation sheets ○ Individual meetings and group meetings with the compensation committee ○ Quarterly reports developed by NAT ○ Meeting with a representative sample of the PAPs |
| Transparency and Efficiency of Stakeholder Engagement Activities | <ul style="list-style-type: none"> ○ Consultation activities conducted with the PAPs <ul style="list-style-type: none"> ● Lists of participants ● Photos ● Comments and feedback ● Minutes of discussion ● Corrective procedures applied after the meetings ○ Engagement of various groups with particular attention to vulnerable groups ○ Sufficiency of information shared with the PAPs ○ Questions raised by PAPs | <ul style="list-style-type: none"> ○ Consultation activities reports ○ Analysis of participants ○ NAT quarterly reports ○ Meetings with various PAPs |
| Efficiency of | <ul style="list-style-type: none"> ○ RAP is disclosed on NAT website | <ul style="list-style-type: none"> ○ NAT website |

| Aspects | Means of Verification | Source of Information |
|--|--|--|
| Disclosure and Information Sharing Activities | <ul style="list-style-type: none"> ○ Total number of people logged into the website ○ Information they obtained ○ Information they were in lack to obtain ○ Frequency of information sharing with PAPs ○ Logistics and information channels | <ul style="list-style-type: none"> ○ NAT quarterly report ○ Meetings with various PAPs |
| Capacity of NAT Staff is Enhanced | <ul style="list-style-type: none"> ○ Training and workshops conducted with NAT staff <ul style="list-style-type: none"> ● Lists of participants ● Photos ● Pre and post evaluation ● Training report ○ Social Performance Indicator of NAT | <ul style="list-style-type: none"> ○ Training reports ○ SPI indicators ○ EIB mission reports |
| Efficiency of the Mitigation Measures | <ul style="list-style-type: none"> ○ Total Number of persons compensated for shops versus the baseline information provided in the RAP ○ Number of persons left with no compensation (by types of losses) and reasons ○ Date of expropriation decree ○ Cut off-date ○ Compensation options discussed with the PAPs ○ Perception of PAPs towards the provided compensation ○ Impact on the livelihood of PAPs ○ Income restored ○ Responsiveness to corrective procedures proposed by the EIB ○ Petitions raised to court | <ul style="list-style-type: none"> ○ RAP ○ NAT quarterly report ○ Meetings with various PAPs ○ Baseline photos ○ Results of court cases |
| Efficiency and Accessibility of the Grievance and Redress Mechanism | <ul style="list-style-type: none"> ○ Total number of grievances received from each channel segregated by sex, age, educational level and area ○ Total number of solved complaints ○ Total number of unsolved ones ○ Obstacles and constrains met to solve the problem (to be segregated by the interested entity) ○ Strategies adopted to inform PAPs about grievance mechanism ○ Total number of PAPs who have no access to the GM ○ Reasons for not having access to the GM | <ul style="list-style-type: none"> ○ Grievance log ○ NAT quarterly report ○ Meetings with various PAPs |

| Aspects | Means of Verification | Source of Information |
|---------|--|-----------------------|
| | segregated by sex, age, educational status and area <ul style="list-style-type: none"> ○ Average time for grievance processing ○ Number of open grievances at the end of each quarter and trends over time ○ Gender and potential vulnerabilities of aggrieved individuals ○ Barriers faced to solve the complaints and how they were solved | |

9. IMPLEMENTATION

The implementation of the RAP requires certain level of cooperation between NAT and other entities e.g. the governorate authority, project steering committee and compensation committee

9.1 Roles and Responsibilities of NAT

NAT is responsible for the proper implementation of the RAP, including stakeholder engagement and managing the grievance and redress mechanism under the RAP and bridging the gaps to ensure that compensations are carried out at full replacement cost and that livelihood restoration measures/resettlement assistance are provided. The mandates below will be fine tuned during the RAP preparation. During the preparation and implementation of the RAP the entities below will participate.

Table 9-1 Roles and responsibilities of the entities responsible for RAP implementation (NAT)

| Entity | Phase | Mandates |
|--|--|--|
| Real Estate Department (RED) | During preparation and implementation of the RAP | <p>Their tasks are as follows:</p> <ul style="list-style-type: none"> Identify the needed lands (public or private if any) to be obtained based on transfer of ownership in cooperation with the (SYSTRA) Prepare memo to be shared with the Minister of Transport about the Public Interest Decree pertaining to involuntary resettlement and reallocation of public assets A memo indicating the project that needs to be implemented and the initial compensation that must be deposited into the account of the Governorate Authority Participate in the CC Sharing information and carrying out consultation with all PAPS |
| Environmental and Social General Manager (ESGM) | During preparation and implementation of the RAP | <ul style="list-style-type: none"> Oversee the process of the RAP Receive monthly and quarterly reports Attend monthly meetings to be carried out with the CC |
| Community Liaison Officer | During preparation and implementation of the RAP | <ul style="list-style-type: none"> Carry out all consultation activities in full cooperation with the Real estate Department Oversee the grievances received with the Grievance committee Participate in the Compensation Committee |

| Entity | Phase | Mandates |
|--|--|---|
| | | <ul style="list-style-type: none"> Document all consultation activities, meetings, etc Prepare monthly report about RAP activities to be shared with the Real Estate Department and the ESGM Prepare the three-monthly report and share it with the RED and the ESCM |
| Department responsible for the Unified Governmental Complaint Portal (used by all ministries, entities and organization of Egypt) | During preparation and implementation of the RAP | <ul style="list-style-type: none"> Manage all received grievances from the GCP Share information about the grievances with the CLO |
| Committee to be established for grievance | During preparation and implementation of the RAP | <ul style="list-style-type: none"> Manage all grievances related to Raml Tram Project Attend monthly meeting with the CC Cooperate with the CLO and share all documents related to the GM (received complaints- grievance log-closure forms, etc) |

9.2 Roles and Responsibilities of other Entities

This RPF sheds light on the institutions that will participate in the implementation and monitoring of the RAP activities. Given the absence of any involuntary land acquisition, the institutional arrangement will not be the same as the ones defined by Law under section 2.3 of this report as there is no private land acquisition.

Two main committees will be responsible for managing the RAP implementation, namely, the Steering Committee and the Compensation Committee

Project Steering committee:

- The steering committee is formulated from almost all entities in Alexandria e.g. housing directorate, traffic department, social solidarity directorate, road directorate, etc and headed by Alexandria Governor.
- They are responsible for high level decisions related to the project including compensation and entitlement decisions.
- The governor of Alexandria is responsible for the signing the decree of compensation committee formation.

Compensation committee

The CC will be formulated based on a decree from the governor or the Minister of Transport. The CC might be composed of representative of:

- General Authority of Government Services (GAGS),
- The Directorate of Real Estate Taxes (RET) in the governorate level.
- Department of Land Surveying (LS) in Alexandria Governorate,
- Ministry of Finance,
- Housing Surveys (HS) inside Governorate Authority, and APTA.

In addition to representative of the owner (**NAT and MOT**). Moreover, the district authorities and other units might attend.

The compensation committee is responsible for:

- Collecting information about all affected people
- Calculation of the compensation based on the recommended valuation process included in the RPF
- Share information with all PAPs about the project and their entitlement and valuation process as well as the time plan
- Send any official notifications of evacuations
- Applying internal monitoring of all activities
- Disclose lists of affected people and receive any disagreement requests
- Receive all official documents from the PAPs (ID- water, electricity and gas receipts- lease contract- tax register- commercial register ...etc) and share them with NAT
- Disburse the compensation and the entitlements
- Maintain official documents and share them with NAT
- Manage all financial disbursements

Detailed roles and responsibilities can be summarized for entities responsible for RAP implementation as follows:

Table 9-2 Roles and responsibilities of the entities responsible for RAP implementation (Governmental organizations)

| Entity | Roles and responsibilities |
|--|---|
| Alexandria governor | Responsible for issuing a decree related to the formation of compensation committee |
| Directorate of Housing and Infrastructure Research affiliated | They are responsible for setting the alternative resettlement options for the affected people and participate in all operational procedures concerning defining compensation value and setting improvement actions within informal settlements. |

| Entity | Roles and responsibilities |
|---|--|
| to the Ministry of Housing Utilities and Urban Communities | |
| Housing surveys inside Governorate Authority | They are the main entity to identify the exact owner or tenant of any commercial asset. They prepare a census survey about the project affected asset that work as a basis for the compensation. |
| Agriculture Directorate affiliated to Ministry of Agriculture And Land Reclamation | They are part of the compensation committee to be formulated on the Governorate level and they will be provide price lists of affected trees of the private garden |
| Alexandria Passenger Transportation Authority (APTA) | They will be responsible for relocation of their workers during construction phase. They will share information with NAT about APTA workers who were relocated due to the Raml Tram rehabilitation |

The CC formation reflects that all entities responsible for RAP implementation are assembled in one committee. Accordingly, there will be no contradictions or conflicts. Having also a representation of PAPs will facilitate the process by sharing information.

In addition to the above-mentioned entities, the social solidarity directorate will be responsible for providing shelters for street children based on NAT decision. NAT will coordinate with the directorate to accommodate also homeless people as reported in the entitlement matrix.

Security department and health directorate will also play a role in the process of accommodating homeless and street children.

Detailed roles and responsibilities will be presented in the RAP after selecting the Compensation Committee and Steering Committee members.

With regards to independent monitoring, NAT will recruit an independent consultant for at least 9 month period to monitor all resettlement activities. The Consultant will work closely with the Compensation Committee and NAT under supervision from the EIB and AFD.

9.3 Capacity Building

A rapid needs assessment was conducted for the aforementioned entities in 2020 and 2021. It revealed that various entities such as the Governorate authority, the compensation committee, the person in charge for grievance mechanism and grievance mechanism

committee are not fully aware of the funding agencies requirements. Such lack of information might affect the project implementation. All entities will be fully aware of the implementation of RAP in full compliance with funding agencies requirements, valuation of assets according to full replacement cost, develop cadastral maps, negotiate and consult with community people.. etc.

NAT must finance the capacity building program in order to meet the requirements of the funding agencies.

Training modules are proposed to enhance the capacity of the implementing partners, to enable the concerned parties to meet the requirements of the Project specific Resettlement procedures. Four training courses are the core for the implementation of the RAP; they are as follows:

- EIB and WB policies related to resettlement activities. (including valuation-entitlement- eligibility- gaps between national and international requirements and strategies to bridge the gaps.
- Stakeholder engagement and consultation skills
- Skills of documentation: this module attempts to provide the entities with filing skills that will be needed for reporting and auditing missions of the funding agencies.
- Monitoring and evaluation: It is one of the most crucial trainings required to enhance the monitoring skills of NAT staff

In addition to the above trainings, it is important that the Social Development Officers working within the Project Management Unit in the NAT be provided with information on the community issues related to the project through the following two courses:

- Participatory approach: to engage with the community in participating in the project activities. This approach will be useful to enhance the dialogue between the NAT and the communities hosting the project
- Awareness building and communication skills: These trainings are important for the success of the project, especially for informing the community on project impacts and mitigation measures. Provision of such training will therefore be useful to the Social Development Officer and the implementing agencies in order to provide PAP's with required information.

- Managing grievance mechanism in full compliance with the funding agencies standards, including, sharing information about GM, document and manage grievances and reporting.

Table 9-3: Proposed Capacity Building Activities

| Training module | Learning objectives | Duration & date | Proposed trainees | Proposed cost |
|--|---|---|--|---------------|
| EIB and WB policies related to resettlement activities | <ul style="list-style-type: none"> • Acquire a full understanding of the Standard 6 pertaining to Involuntary Land Acquisition and World Bank ESS 5 • Obtain a full understanding of the needed actions within this policy and its instruments (RPF- RAP-LRP) | 1 day for the theoretical part 2 days for the on the job training <i>Prior to the resettlement implementation</i> | Community liaison officers Real estate staff Environmental manager Alexandria Governorate staff | 1,000 US\$ |
| Stakeholder engagement | <ul style="list-style-type: none"> • Gain better understanding of stakeholder engagement standard 10 and WB ESS 10 • Obtain proper understanding of communication methods, strategy and outreaching • Train on negotiation skills needed with the PAPs | 1 day for the theoretical part 2 days for the on the job training <i>Prior to the resettlement implementation</i> | Community liaison officers Real estate staff Environmental manager Alexandria Governorate staff | 1,200 US\$ |
| Skills of documentation and managing hard and soft files | <ul style="list-style-type: none"> • Obtain a full understanding of the filing process • Obtain a full understanding of the needed items to apply a good and | 1 day for the theoretical part 2 days for the on the job training <i>Prior to the resettlement implementation</i> | Community liaison officers Real estate staff Environmental manager | 800 US\$ |

| Training module | Learning objectives | Duration & date | Proposed trainees | Proposed cost |
|------------------------------|---|--|--|---------------|
| | <p>comprehensive documentation</p> <ul style="list-style-type: none"> Gain the ability to develop a report about the grievance and redress Keep records and document various compensation related documents | | Alexandria Governorate staff | |
| Monitoring and evaluation | <ul style="list-style-type: none"> To understand the monitoring definition and the role of monitoring and evaluation in the project To learn about effective monitoring and evaluation tools and reporting formats | <p>1 day for the theoretical part 2 days for the on the job training <i>Prior to the resettlement implementation</i></p> | <p>Community liaison officers Real estate staff Environmental manager Alexandria Governorate staff</p> | 750 US\$ |
| Awareness Raising Activities | <ul style="list-style-type: none"> To gain better understanding of awareness raising activities and how to raise awareness of marginalized and vulnerable groups about their legal rights pertaining to economic restoration and grievance mechanism | <p>1 day for the theoretical part 2 days for the on the job training <i>Prior to the resettlement implementation</i></p> | <p>Community liaison officers Real estate staff Environmental manager Alexandria Governorate staff</p> | 750 US\$ |
| Managing grievance mechanism | <ul style="list-style-type: none"> To gain better understanding of the GM importance and how to manage, monitor and report all grievances received | <p>1 day for the theoretical part 2 days for the on the job training</p> | <p>Community liaison officers Committee responsible for grievances Environmental manager</p> | 750 US\$ |

| Training module | Learning objectives | Duration & date | Proposed trainees | Proposed cost |
|-----------------|---------------------|---|-------------------|-------------------|
| | | <i>Prior to the resettlement implementation</i> | | |
| Total | | | | 5,250 US\$ |

9.4 Schedule

The RAP calendar will be consistent with the works calendar in order to avoid problems and penalties in the allocated works contracts. Information regarding the calendar (when the areas will be evacuated) will be inserted in the bidding documents and construction contracts to avoid penalties. The following schedule summarizes on-going and planned RAP -related activities.

Table 9-4 RAP -Related Activities Schedule

| Activity | Anticipated Date |
|---|--|
| Preparation of the design and final alignment | Completed in December 2021 |
| The technical department in NAT to review the designs | Completed end of December 2021 |
| Real Estate Department in NAT are informed about the final alignment | Completed end of December 2021 |
| Receive the Public Interest Decree | Completed in the 22 nd of December 2021 |
| Deposit tentative budget for compensation purpose (50 million EGP as included in the Public Interest decree issued on the 22 nd of December 2021 | To be determined |
| Reallocation of tramway route by APTA and Public Interest Decree | Started in the 22 nd of December 2021 |
| Housing Department to start the final census of workers of the shops | To be determined |

| Activity | Anticipated Date |
|---|---|
| After developing the final census by Housing Department, the compensation will be disbursed | To be determined |
| RAP preparation | After finalizing the census |
| Consultation activities will continue from November 2021 till the completion of all compensation activities | Ongoing |
| Capacity building activities | During the first and second quarter of 2022 |
| Grievance mechanism shall start in January 2022 and continue until full completion of compensation activities | First quarter of 2022 |
| RAP implementation | During the first and second quarter of 2022 |
| Monitoring of activities and documentation will start upon starting all activities | Ongoing |

9.5 Budget

The Project will ensure that compensation costs, as well as resettlement costs, are built into the overall project budget and is clearly defined as an “upfront” project cost.

In addition, the Project will ensure the planning and implementation of any resettlement is factored into the project development schedule. All forms of compensation and resettlement assistance must be provided prior to displacement. In addition, all compensation and resettlement works must be concluded at least three months prior to actual commencement of any construction works. The total budget will be determined in the RAP.

NAT has to secure bank accounts to disburse the compensation to (in case of the PAP has no bank account) The RAP should collect information about the PAPs who have bank accounts, including workers. The cost of opening bank accounts will be paid by NAT. The budget will include, monetary compensation cost, capacity building and independent consultant cost, engagement activities cost, printed materials cost and the bank account cost. The budget should also include allowances for inflation, population growth, and other

contingencies that might cover all impacts related to temporary disturbance of shops and any other costs.

For the time being, NAT in full compliance with Land Interest Decree will disburse 50 million EGP to the entity responsible for compensation disbursement in three months (by March 2022) (please see Annex 21 page 18).

LIST OF ANNEXES

Annex 1: List of Shop tenants and Their Contracts Duration

Annex 2 : Maps Presenting Some Project Affected Assets' Locations

Annex 3: List of Photos Presenting Project Affected Assets and Their Coordinates

Annex 4: Lease contract

Annex 5: Consultation Activities

Annex 6: Some Maps of the PAPs

Annex 7: Social Solidarity Letter - Raml Tram

Annex 8: NAT letter to APTA about not leasing shops after cut-off date

Annex 9: Clarifications from APTA about leasing shops after the cut-off date

Annex 10: Description Cards of Raml Tram Project

Annex 11 Value of Rented Shops

Annex 12: Public Interest Decree Memo - Raml Tram

Annex 13 Sidi Gaber North Loop exclusion

Annex 14 Employment Websites in Alexandria

Annex 15 Minimum Wage Decree

Annex 16 Photo log of All shops

Annex 17 Total revenue of each shop

Annex 18-Raml Updated time plan

Annex 19 Land acquisition decree

Annex 20 Documents of the NGO running the mosque

Annex 21 Disclosed land acquisition decree in the national press

Annex 22 Resettlement Handbook

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