



## 1.5 Million Natural Gas Connections Project in 11 Governorates

### Environmental and Social Impact Assessment Qaha -PRS

Qalyubia, Governorate  
**Final Report**

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**EGAS**

Egyptian Natural Gas Holding Company

Developed by



**“Petrosafe”**

Petroleum Safety & Environmental Services  
Company



**EcoConServ**  
ENVIRONMENTAL SOLUTIONS

EcoConServ Environmental Solutions



## List of acronyms and abbreviations

|           |  |
|-----------|--|
| AFD       | Agence Française de Développement (French Agency for Development)  |
| ALARP     | Stands for "As Low As Reasonably Practicable", and is a term often used in the milieu of safety-critical and safety-involved systems. The ALARP principle is that the residual risk shall be as low as reasonably practicable. |
| CAPMAS    | Central Agency for Public Mobilization and Statistics  |
| CDA       | Community Development Association  |
| EEAA      | Egyptian Environmental Affairs Agency  |
| EGAS      | Egyptian Natural Gas Holding Company   |
| EIA       | Environmental Impact Assessment  |
| EMOP      | Egyptian Ministry of Petroleum   |
| ESIA      | Environmental and Social Impact Assessment   |
| ESMF      | Environmental and Social Management framework  |
| ESMP      | Environmental and Social Management Plan   |
| FGD       | Focus Group Discussion   |
| GPS       | Global Positioning System  |
| HH        | Households   |
| HP        | High pressure  |
| HSE       | Health Safety and Environment  |
| IFC       | International Finance Corporation  |
| LDC       | Local Distribution Companies   |
| LGU       | Local Governmental Unit  |
| LPG       | Liquefied Petroleum Gas  |
| mBar      | milliBar   |
| NG        | Natural Gas  |
| NGO       | Non-Governmental Organizations   |
| PAPs      | Project affected persons   |
| P&A       | Property and Appliance Survey  |
| PE        | Poly Ethylene  |
| PRS       | Pressure Reduction Station   |
| SDO       | Social Development Officer   |
| SIA       | Social Impact Assessment   |
| Egypt Gas | Egypt Gas (LDC)  |
| WB        | The World Bank   |
| WHO       | World Health Organization  |
| \$        | United States Dollars  |
| €         | Euros  |

Exchange Rate: US\$ = 15.8 EGP as of October, 2020

Exchange Rate: € = 18.6 EGP as of October, 2020



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## 0. Executive Summary

The objective of the proposed project is to construct a Pressure Reduction Station (PRS) at Qaha district, Qalyubia Governorate in order to install the NG to wider segment of clients. The PRS for Qaha will be designed to reduce an inlet pressure of 25-70 bar to an outlet pressure of 7 bar at a flow rate of 10,000 m<sup>3</sup>/h. Flow rate can be increased to 25,000 m<sup>3</sup>/h in the future according to demand increase.

The ESIA is undertaken to assess and propose mitigations for environmental and social impacts of the PRS. Impacts of NG exploration, extraction, refining, and transmission are outside the scope of this ESIA. Impacts of distribution networks for different areas are addressed in separate Environmental and Social Management Plans (ESMPs). Off-take will be located on the high pressure (HP) pipeline “70 bar system” of the national gas network which is already exist within the purchased PRS land.

The local distribution company responsible for project implementation in Qaha is **Egypt Gas**

In order to install the PRS, there was a need to one plot of land of 3440 m<sup>2</sup> obtained in accordance to willing buyer willing seller approach provides the sale contract of the land.

EGAS and LDCs follow a set of agreed upon procedures for the process of permanent Land take for the construction of PRSs [Annex-2](#). The procedure covers cases of land acquisition of State-Owned Lands or privately-owned Lands on willing Buyer Willing Seller basis. It is the priority of EGAS as an asset holder, to acquire State Owned Lands that are free of any uses (both formal and informal), EGAS never resorts to the land expropriation decrees in PRSs selection, particularly because of the flexibility of the PRSs locations.

In cases of unavailability or in case the available land is technically unacceptable, private land is usually used as a second a resort. Land alternatives are examined and the optimum technical and socio-economic scenario of land is selected. Consultation activities are conducted through the project cycle including with the individuals who offer to sell their land, dissemination of project information at the early stages of the project during the frameworks preparation followed by consultation activities with the Project affected persons (e.g. cases of farmers whose land are temporary affected from the high pressure pipelines passing their land) and during land acquisition with land owners.

The PRS is located at Qaha district within Al Hassaniya village, about 200 m east Cairo – Alexandria agricultural Road, about 1500 m south Monshaat Shoubra Hars village, about 2800 m south west of Namool village, 2000 m north Qaha city and about 2700 m west Tersa village.

The Off-take site located inside the PRS location were the hot tap operation will take place on the existing HP pipeline which passes through the location area (there is no new HP pipeline installation works). The nearest residential building is located approximately 500 m west of the Off-take site. (Qaha buildings)



The project will be regulated by both the World Bank and Egyptian regulations pertaining to environmental and occupational health and safety. Long list of laws was presented in chapter 3 of this report.

The PRS is located in Qaha district affiliated to Qalyubia Governorate, which is located in the southern part of the Nile delta in Egypt, and very close to Cairo about 28 km to the north of Cairo, bordered from north by Monshaat Shoubra Hars village, from south by Qaha city, from east by Namool village and from west by Tersa Village., the average annual temperature in Qaha is 21.1°C, July is the warmest month At 27.5 °C on average, January is the coldest month of the year At 13.4°C on average. Average annual precipitation varies 3.3 mm between the driest month and the wettest month. The wind speed in Qaha area is characterized by a calm to moderate. The highest average wind speed occurs during spring in March.

Qaha PRS is located about 10 km east Damietta Nile Branch. The River Nile Branch represents the main freshwater stream that extends northwards for about 236 km on the Eastern boundary of the Nile Delta from Egypt's Delta Barrage Damietta. The branch has an average width of 180 m and a depth between 2 to 4 m. the nearest canal located beside the PRS location is Khalig Alshamy canal (about 0.16 km west the PRS).

The air quality at the site of the proposed PRS is exhibiting permissible limits of classic air pollutants in fact the levels are way below the national and international guidelines. The project site relies upon two sources of water, namely, the Nile water carried to the Governorate by a pipeline and rain water that is harvested during winter season.

With respect to flora of significance, none were encountered in the proposed project area, where PRS site are constructed. The current PRS area is free of significant vegetation. Planned off-take from national grid to the gas route shall not come into contact with flora and the uncultivated vegetation cover alongside the desert as the off-take located within the proposed PRS location.

Qaha district is located in Qalyubia Governorate. Municipal solid waste collection points, used as open transfer systems, where waste is collected by local units Trucks and then transferred to Trucks to Qaha intermediate waste handling area then to be transferred by larger trucks to the main Abu Zaabal dumpsite which located approximately 15 km from the PRS location. The PRS in Qaha is located in an area characterized as agricultural land. The district hosts many industrial activities. Consequently, the traffic tends to be dense. The total population of Qaha district is estimated at 47723 people in 2017.

According to the data provided by the Local Governmental Unit LGU, accessibility to electricity, water and sanitation networks is widespread in Qaha district, as 100% of individuals have access to the public electricity and water network, while sanitation network is covering between 70 to 100%. The PRS will be supplied by electricity from the National electricity grid.



The project will result in various positive impacts pertaining to job opportunities and potential supplies. However, it will result in potential negative impacts. Following is a summary table listing the impacts of relevance to the project:

**Table 0-1: Impacts of relevance to the project**

| Potential Negative Impact               | Impact significance |
|---|---------------------|
| <b>During Construction:</b>             |                     |
| Deterioration of soil quality           | Medium              |
| Air emissions                           | Minor               |
| Noise                                   | Medium - Minor      |
| Occupational Health and safety          | Medium              |
| Impacts due to Covid-19 pandemic        | Medium              |
| Labor Influx                            | Medium              |
| Child labor                             | Minor -Medium       |
| Waste generation                        | Medium              |
| Traffic                                 | Minor               |
| Ground water contamination              | Minor               |
| Community health and safety             | Minor               |
| Impacts related to lands                | Minor               |
| <b>During operation:</b>                |                     |
| Occupational Health and safety          | Medium              |
| Impacts due to Covid-19 pandemic        | Minor               |
| Hazardous material and waste management | Medium              |
| Noise                                   | Minor               |

A long list of mitigation and monitoring measures was presented in this report in chapter-7. Consultation activities in Qaha district have included wide range of concerned stakeholders. This included but not limited to individuals/households affected by the project activities, civil society organizations representing the interest of the community, and governmental bodies who will play a role in facilitating or regulating the implementation of site-specific project activities.

The Project affected persons (PAPs) expressed their eagerness to host the project as the natural gas will reduce their agony with the LPG cylinders. Surprisingly, there was no single comment raised about the safety of the PRS. The PRS did not raise any concerns among the community in the vicinity areas.

## 1. Introduction

### 1.1 Project Objectives

The objective of the proposed project is to construct Pressure Reduction Station (PRS) at Qaha district in order to install the NG to wider segment of clients in Qaha. The proposed PRS will be designed to reduce an inlet pressure of 25-70 bar to an outlet pressure of 7 bar at a flow rate of 10,000 m<sup>3</sup>/h. Flow rate can be increased to 25,000 m<sup>3</sup>/h in the future according to demand increase.

### 1.2 Environmental and Social Impact Assessment (ESIA)

The ESIA is undertaken to assess and propose mitigations for environmental and social impacts of the PRS. Impacts of NG exploration, extraction, refining, and transmission are outside the scope of this ESIA. Impacts of distribution networks for different areas are addressed in separate Environmental and Social Management Plans (ESMPs). It is worth mentioning that in **March 2014**, an Environmental and Social Impact Assessment Framework (ESIAP) was developed for the project's Governorates including Qalyubia Governorate. Also, in September 2016, an ESMP study has been conducted for eleven districts named Shebin El Qanater, El Obour, El Qanater el Khairia, Qaluob, El Hadtha, Shalaqan, Kafr El Gazar, Balaqs, Shobra El Kheima, El Ramla-Meet El attar, El Khosous districts. In March 2018, an ESMP study has been conducted for four districts named (El Qalag, El Gabal El Asfar, Met Asem, Izbet Afandena. And lastly in August 2019, an ESMP study has been conducted for two districts named (Kafr Shukr, Qaha)

The aforementioned studies were cleared by the World Bank and disclosed on EGAS website and the Bank info shop.

The Off-takes from the national network planned to be exist within the purchased PRS land.

**The ESIA objectives includes:**

- Describing project components and activities of relevance to the environmental and social impacts assessments.
- Presenting project alternatives and the no project alternative.
- Identifying and addressing relevant national and international legal requirements and guidelines
- Describing baseline environmental and social conditions
- Assessing potential site-specific environmental and social impacts of the project
- Developing environmental & social management and monitoring plans in compliance with the relevant environmental laws
- Documenting and addressing environmental and social concerns raised by stakeholders and the Public in consultation events and activities

**The local distribution company responsible for project implementation in Qaha district is Egypt Gas.**



### 1.3 Contributors

The ESIA prepared by Petrosafe (Petroleum Safety & Environmental Services Company and Ecoconserv Environmental Solutions (Cairo, Egypt) with collaboration and facilitation from EGAS, Egypt Gas HSE and Engineering Departments. The names of the Petrosafe and Ecoconserv experts who have participated in the preparation of the ESIA study listed in [Annex 1](#) attached to this report.

**Table 1-1: List of Main Contributors**

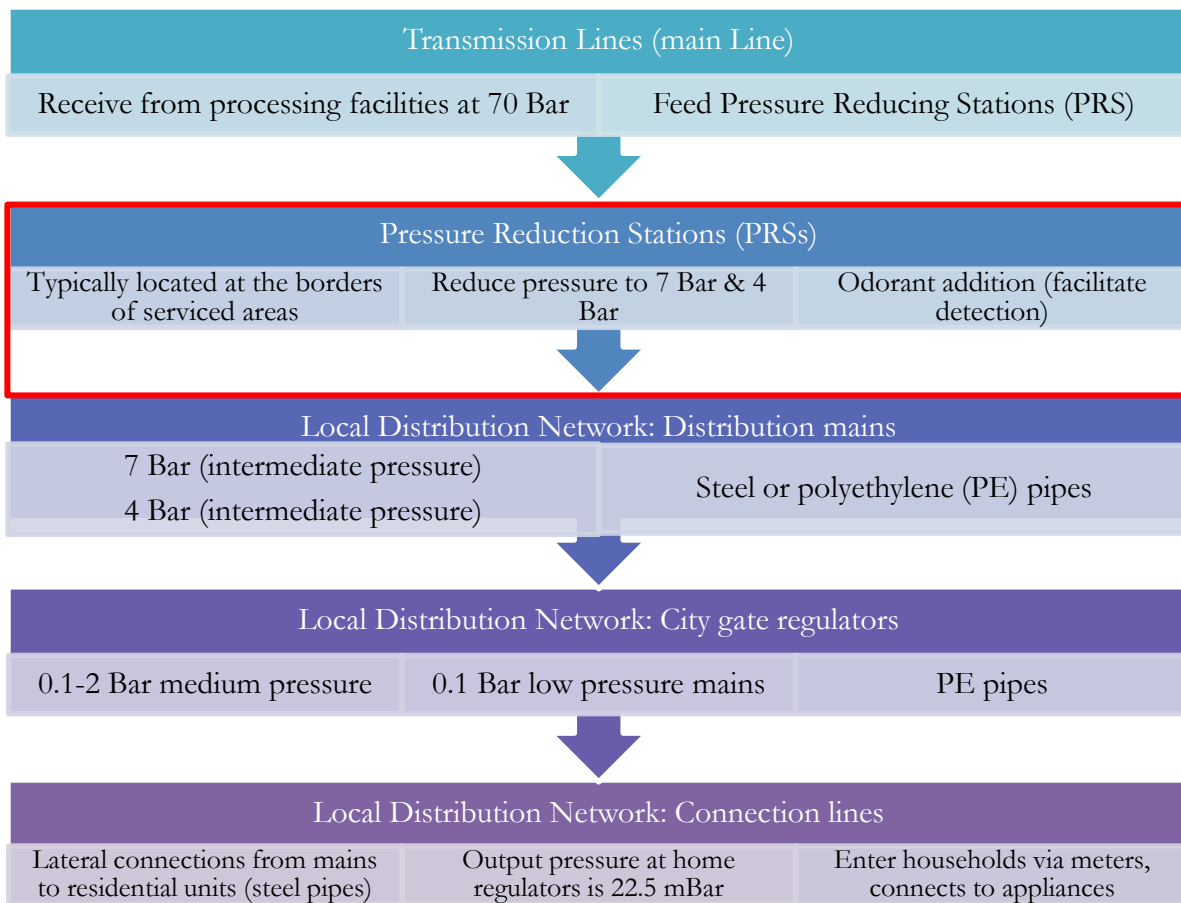
| Team Member                      |                                  |
|----------------------------------|----------------------------------|
| • Geo. Mohamed El-Ghazaly        | • Dr. Khaled Gamal               |
| • Dr. Zeinab Farghaly            | • Chem. Mohamed Saad Abdel Moein |
| • Chem. Mohamed Abdel Moniem Aly | • Economist/ Osama Kamal         |

## 2. Project Description

### 2.1 Background

Natural Gas (NG) is processed and injected into the high-pressure lines of the national Grid (70 Bar) for transmission. Upon branching from the main lines to regional distribution networks, the pressure of the NG is lowered to 7 Bar at the PRS. An odorant is added to the NG at PRSs feeding distribution networks to residential areas<sup>1</sup> in order to facilitate detection in the event of leaks. In addition to excavation, key activities of the construction phase also include installation of mechanical equipment.

The diagram below **Figure (2-1)** presents the components of a city’s distribution network. The component covered in this ESIA is lined in red. Other components are addressed in a separate ESMP:



**Figure 2-1: General components of the city’s distribution network**

<sup>1</sup> Because natural gas is odorless, odorants facilitate leak detection for inhabitants of residential areas.



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## 2.2 Project Work Packages

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### 2.2.1 Pressure Reduction Station (PRS)

A PRS consists of the following components: an inlet unit (isolated cathodic system), a liquid separation unit, a filtration unit and equipment for automatically reducing and regulating the pressure (active regulator and monitor regulator). In addition, auxiliary devices include safety valves (Slam Shut), relief valves, an odorizing unit and ventilation equipment as shown in [Figure 2-2](#).

Utilities existing in a PRS include a control room, a firefighting system (firefighting water tank, firefighting valve), staff bathroom, a storage area and entrance room located adjacent to the entrance gate

The PRS for Qaha will be designed to reduce an inlet pressure of 25 -70 bar to an outlet pressure of 7 bar at a flow rate of 10,000 m<sup>3</sup>/h. Flow rate can be increased to 25,000 m<sup>3</sup>/h in the future according to demand increase order to feed Qaha district.

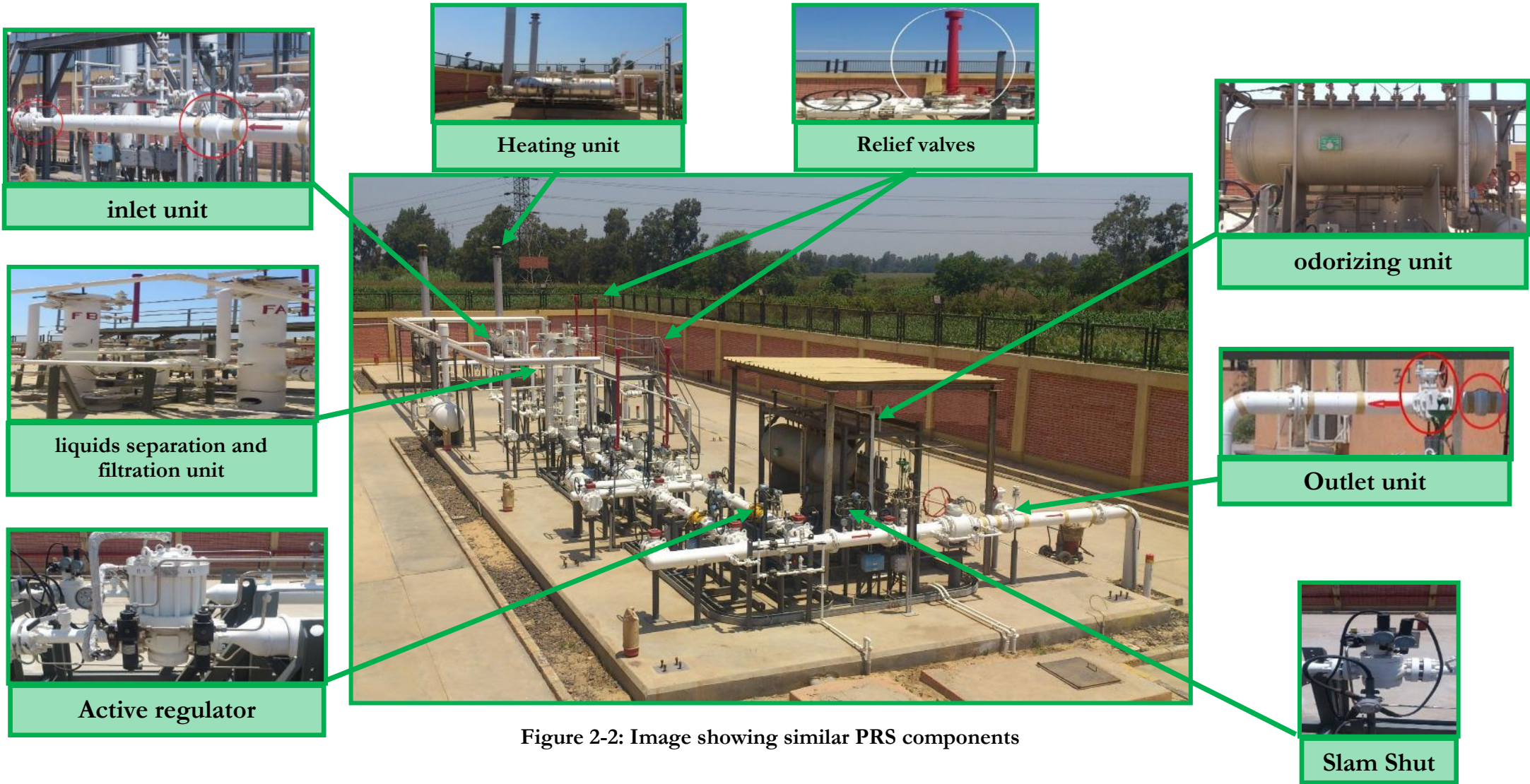


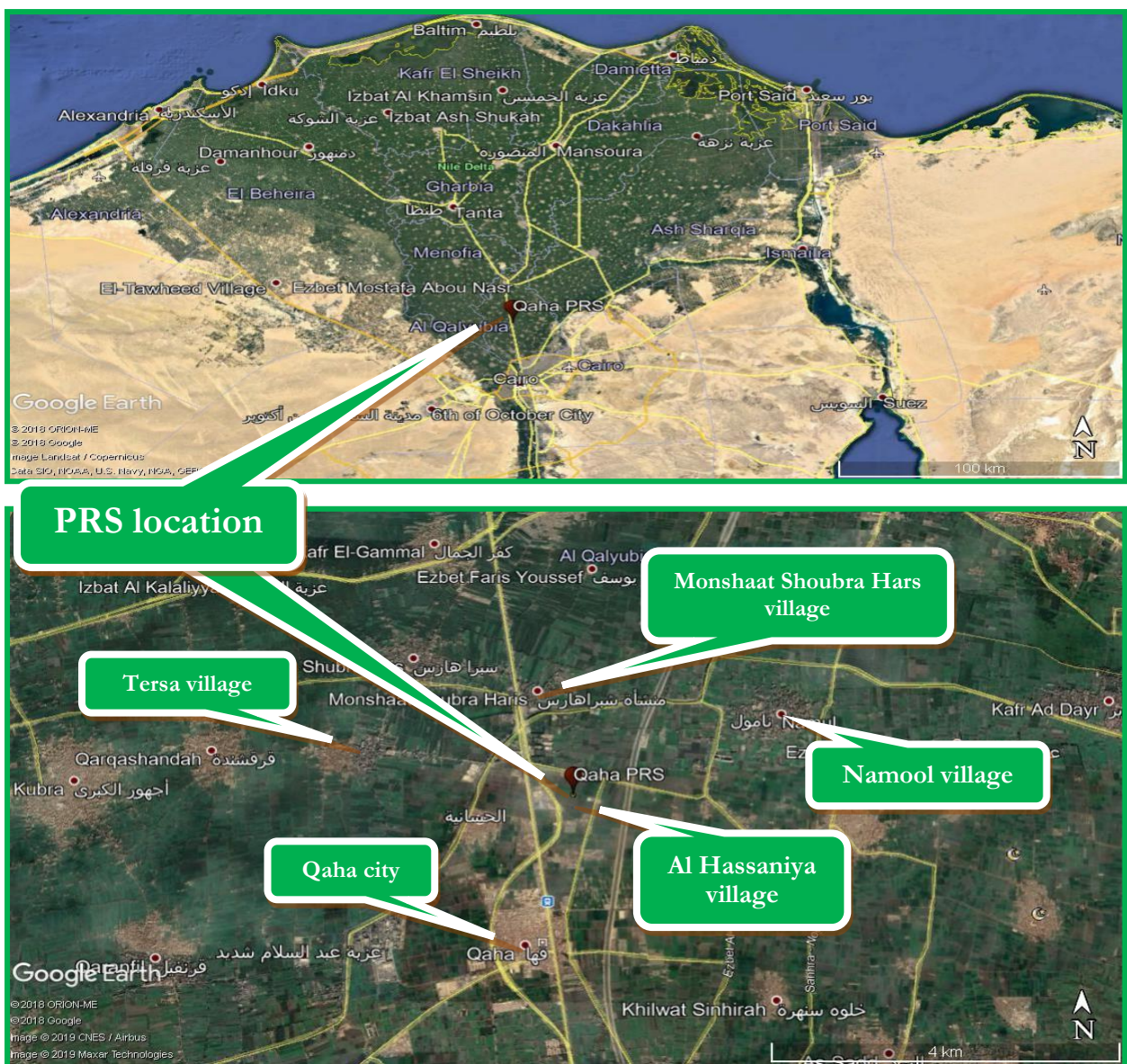
Figure 2-2: Image showing similar PRS components

## 2.3 Project location

### 2.3.1 Pressure Reduction Station (PRS)

The PRS is located at Qaha district within Al Hassaniya village, about 200 m east Cairo – Alexandria agricultural Road, about 1500 m south Monshaat Shoubra Hars village, about 2800 m south west of Namool village, 2000 m north Qaha city and about 2700 m west Tersa village.

The Off-take site is located inside the PRS location (within the borders of the PRS) where the hot tap operation will take place on the existing HP pipeline, which pass through the location area (there is no new HP pipeline installation works. The nearest residential building (Qaha buildings) is located approximately 500 m east of the Off-take site as shown in **Figure 2-3, Figure 2-4 and Figure 2-5**



**Figure 2-3: a satellite map showing the proposed Location of Qaha new PRS.**



Figure 2-4: The proposed Location of Qaha new PRS feeding Qaha district and nearest residential areas





Figure 2-5: Pictures showing the proposed PRS access road



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## 2.4 Off-take and HP pipeline

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As previously mentioned, the Off-take will be located on the high pressure (HP) pipeline “70 bar system” of the national gas network which is already exist within the purchased PRS land. The Off-take is the point on the HP national grid pipeline where a branch of the pipeline is constructed to connect a new PRS to the national grid. At the Off-take location, valve rooms/valve ditching is constructed so as to control the flow of the natural gas through the pipeline (branch). These valves work like gateways for the Qaha district. The natural gas composition of the national network is mainly Methane (80%) and traces of ethane, propane, Iso-butane, Nitrogen...etc.. The Off-take located inside the PRS location. The nearest residential area is Qaha buildings which located approximately 500 m west of the Off-take site.

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## 2.5 Project Execution Methodology

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### 2.5.1 General survey

- Identifying availability of utilities in the area and their conditions (electricity, water, telephone lines, and sanitary pipelines) through data and maps from the relevant authorities.
- Identifying the location of the nearest national grid pipelines, gas networks.
- Identifying the location of the new PRS location and new off-take location.
- Identify the route of inlet connection “70 bar system”

### 2.5.2 Design and material take-off (MTO) including procurement

Once the final location of project components is finalized, a final design of the Off-take and PRS is utilized to estimate the materials and equipment needed to implement the project. Procurement of the materials includes local and international components. The main international purchases may include critical components and PRSs, regulators, and metering stations.

### 2.5.3 Construction works of PRS

#### **Pressure Reduction Station area:**

PRS siting was performed according to international best-practice and guided by minimizing the possible negative impacts on the project’s surroundings; the safety of neighboring areas from possible gas release accidents; and noise associated with the operation of reducers. The PRS will be surrounded by a wall for safety and security purposes (including reducing noise impacts of the PRS reducers on the surrounding receptors). Currently, there are scattered buildings in the agricultural land surrounding the PRS. The nearest residential area around 500 m west of the proposed PRS location, **(Figure 2-5)**. In the event that buildings are constructed in the area surrounding the PRS, the Institute of Gas Engineers Safety Recommendations requires the following buffer zones:

- PRS should have free areas from each side to allow for emergency vehicle access.
- The nearest residential building to the proposed PRS is far about 500 m (Qaha buildings).



#### 2.5.4 Land acquisition for PRS

As a new PRS will be constructed in Qaha district, there was a necessity to select the technically and socially acceptable land with a total area of 3440 m<sup>2</sup> (approximately 19.66 Qirate) in addition to a private road to reach the PRS location (with a length of 233.6 meter and width of 6 meter). Where buying the land of road is essential to create an access to reach the PRS location. Selection process starts by searching for land nearest or closer to the off take of the high-pressure pipeline (70 bar pipeline).

Due to the unavailability of state-owned lands, EGAS/Egypt Gas followed EGAS procedure for acquiring land for the construction of the PRS on Willing Buyer – Willing Seller basis and no involuntary land acquisition took place. (For further elaboration on EGAS procedures for land acquisition see [Annex-2](#))

More than three alternatives of privately-owned lands were inspected. The agreed land was technically, socially, and economically acceptable, the Off-take from the national gas grid and the HP pipeline (70 bar system) already exist inside the selected land and entails no further land acquisition compared to the other land alternatives.

The selected land (for the PRS and the private road) is cultivated by its owner. With no tenants and did not require payment to compensate tenants for crops. It was also mutually agreed that the landowner will be granted enough time to collect his crops before LDC (Egypt Gas) starts any construction works.

Consultation with the possible landowners were conducted during the committees several visits, also further consultation was conducted with the other neighboring landowners to determine the prevailing price (market price) of the land in the targeted area. Prevailing price ranged from 40 to 50 thousand EGP/Qirate, considering the current situation that the land is for agricultural purposes. Consultation meetings also reflected the future expectation of the landowners in this area that the land could be used in the near future for construction of buildings that is of more value than the current land status (agricultural).

Based on the cost estimation analysis carried out by the LDC, and after the negotiations with the landowner, the land and the private road was purchased on 29/1/2018 at a total cost of 2,175,000. EGP (approximately 110630 EGP/ Qirate) and a cheque was issued and received by the landowner. (For further elaboration on Qaha PRS Land Acquisition Process, see annex 8-B).

As mention above the off take is exist in the selected land, so no more land needed to install a high-pressure pipeline. Concerning the low-pressure pipeline, it is close to the main roads. Additionally, the grid penetrates the main roads (state owned lands). Therefore, no lands were required for both the access to high-pressure pipeline and the low-pressure pipeline. Thus, OP 4.12 is will not be applicable to Qaha PRS, Hence, no RAPs are needed. A private road purchased form the same landowner (as mentioned above) to ensure the accessibility to the PRS and quick response in event of repairs and/or emergencies.



### 2.5.5 Pressure Reduction Station Civil Works:

About a 9-months construction schedule is planned for the Qaha PRS with site preparation expected to commence in the second half of 2020.

The main construction activities will include:

- Site preparation, acceptance and placement of major fabricated equipment items, construction of buildings, testing and commissioning.
- Initial construction activities involve clearing and grading of the site, sediment fences and silt traps will be installed, as necessary, to control erosion and sediment transport during site preparation activities.
- Following site preparation, individual excavations will be made for fire-fighting tanks, domestic wastewater trenches, pipe racks, and a 6-m high wall (of cement) around the PRS.
- Concrete foundations for buildings and footings for mechanical equipment will be laid down;
- Facility piping (inlet, outlet and 4-inch firefighting line) both above and below ground, are installed.
- Construction of an about 80 m<sup>2</sup> control room with a bathroom, an electrical unit's room, and a security room adjacent to the PRS.

### 2.5.6 Pressure Reduction Station Mechanical Works:

The Qaha PRS comprises of two pressures streams, the upstream (inlet) high pressure ranging from 25 to 70 Bar and the downstream (outlet) low pressure 7 Bar. The PRS design is in accordance with the Institute of Gas Engineers/ Safety Recommendations IGE/SR/9, 10, 16, 18, 22, 23, 24, 25; Institute of Gas Engineers/ Transmission Distribution IGE/TD/13; and National Fire Protection Association NFPA 15.

Following the construction of the foundation and fences, construction will continue with the installation of mechanical components. Mechanical components include the following:

- Inlet ball valve
- Solid filtration
- Liquid filtration
- Water bath heater
- Reduction regulator
- Active regulator
- Monitor regulator
- Slam shut /Safety valve
- Relief valve



- Measuring unit
- Odorizing unit
- Outlet unit

Please refer to [\(Figure 2-2\)](#) and [\(Figure 2-6\)](#)

### **2.5.7 Testing:**

Following mechanical completion, testing of the facility components will be performed in accordance with applicable standards.

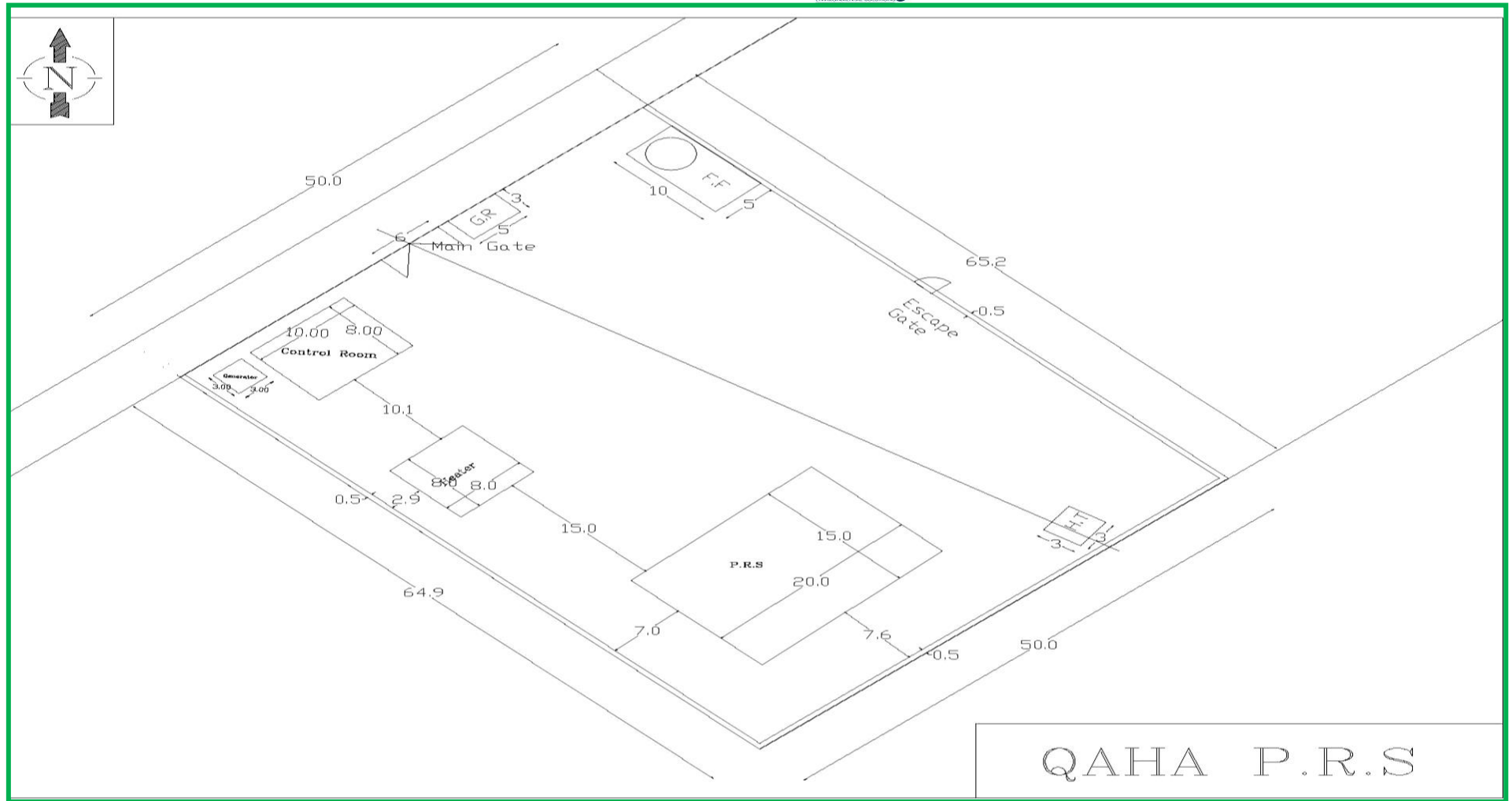


Figure 2-6: The proposed Layout of Qaha new PRS



## 2.6 Operation phase

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### 2.6.1 Operation of the PRS

Operation of the PRS involves operation of the various components outlined in the construction phase as shown in (Figure 2-2). Risks associated with those activities are further addressed separately in a Quantitative Risk Assessment (QRA) (Annex-3) and all its outputs will be adhered, and the Emergency Response Plan (ERP) will be updated if necessary.

### 2.6.2 Inlet ball Valves

The inlet valve includes an insulation joint to completely isolate the PRS inlet from the cathodic system applied to the feeding steel. Insulation joints isolate the PRS as measure of protection during strikes and current.

### 2.6.3 Filtration unit

The filtration unit consists of two main stages, a liquid filtration stage and a solid filtration stage. The aim of the filtration unit is to remove dust, rust, solid contaminants and liquid traces before entering into the reduction stage. Two filters and two separators are installed in parallel; each filter-separator operates with the full capacity of the PRS to separate condensates and liquid traces. The solid filtration unit is designed to separate particulate matter larger than 5 microns. Filter-separator lines are equipped with safety devices such as differential pressure gauges, relief valves, liquid indicators, etc.

### 2.6.4 Heating unit/Water Bath Heater

This unit ensures that inlet gas to the reduction unit enters with a suitable temperature (the temperature of gas flow entering the station should be 15 oC; and to avoid the formation of natural gas water hydrates in the line downstream of the choke or regulator (due to Joule Thompson effect). Temperature increases by heat exchange between gas pipeline pass through the heating unit filled with hot water. The unit was designed to be heated to 60 oC; while the heating temperatures for the outlet flow gas ranges between 35 oC and 45 oC.

The heating unit comprise of the following components:

- Heater body/shell
- Process gas inlet/outlet
- Water Expansion tank
- Burner, Gas Train & BMS Panel
- Removable Fire tube
- Exhaust stack
- Heating medium (Water Bath)

The PRS is equipped with two heaters in parallel (one of them being on standby in case of emergencies).



### 2.6.5 Reduction

The PRS includes two reduction lines in parallel (one of them being on standby in case of emergencies). The lines are equipped with safety gauges, indicators and transmitters to maintain safe operating conditions. According to the IGEM standards, the reduction unit should be installed in a well-ventilated closed area or, alternatively, in an open protected area.

### 2.6.6 Active and Monitor Regulator

The active regulator controls the outlet pressure while the monitor regulator assume control in the event of failure of the active device.

### 2.6.7 Slam Shut Valve

The purpose of Slam shut is to totally, automatically and rapidly cut off gas flow when the outlet pressure exceeds or drops below the setting pressure. The valve has to be installed to protect the system. The safety valve has to be sized for the maximum gas flow with the highest pressure that could be provided to the pressure reducing valve.

### 2.6.8 Measuring Unit

After adjusting the outlet pressure, gas flow and cumulative consumption are then measured to monitor NG consumption from the PRS and to adjust the dosing of the odorant indicated in the subsection below.

### 2.6.9 Odorizing Unit

Natural gas is generally odorless. The objective of odorizing is to enable the detection of gas leaks at low concentration, before gas concentrations become hazardous. The odorant is composed of Tertiobutylmercaptin (80%) and Methylsulphide (20%). The normal dosing rate of the odorant is 10-20 mg/cm<sup>3</sup>. The odorant system consists of a stainless-steel storage tank, which receives the odorant from 200-liter drums, injection pumps, and associated safety devices.

### 2.6.10 Outlet unit

The outlet unit includes an outlet valve gauge, temperature indicators, pressure and temperature transmitters and non-return valves. The outlet pipes are also, like inlet pipes, isolated from the cathodic protection by an isolating joint. *Please refer to Figure 2-2*



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## 2.7 Resources consumption

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### 2.7.1 During Construction

#### Water:

Water is mainly used during the construction phase by the workers and engineers. There is a permanent source of water from Egyptian Holding Company for Drinking Water and Sanitation

Water is mainly used during the construction phase in concrete preparation and domestic uses by the workers and engineers. Water for construction is sourced from trucks. Bottled water will be used for drinking purposes. The expected amount of water to be used during the construction phase of this project is:

- Domestic uses by the workers and engineers: about 5 m<sup>3</sup>/day
- Construction activities: about 75 m<sup>3</sup>

#### Fuel:

Diesel fuel will be mainly used for:

- Diesel generators that supplies electricity to the construction activities including welding.
- Trucks and excavators fuel
- The expected amount of diesel fuel to be used in the construction phase of the PRS is around 60 liters per day. The fuel will be delivered to the construction site via trucks when needed.

### 2.7.2 During operation

#### Water:

Water is mainly used during the operation phase in the firefighting storage tank as well as for domestic use by workers in the PRS and drinking water.

The water source will be determined during the construction phase: either the PRS will be connected to the public water network or water will be delivered by trucks.

#### Electricity

Electricity consumption during the operation phase is expected to be minimal which will be mainly consumed at the control room. The PRS will be supplied by electricity from the National electricity grid network existing in the area.

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## 2.8 Waste Generation

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All solid wastes generating during the construction phase will be managed and disposed in accordance with applicable regulations and established best management practices. All generating wastes will be reused and/or recycled to the maximum extent possible ([Table 7-2](#)).



## 2.8.1 During construction

### Solid wastes

Solid waste generated during the construction phase will comprise of construction wastes, domestic wastes as following:

- Construction waste will consist mainly of left-over piping materials such as polyethylene pipes and carbon steel. The amount of waste is approximately 2% of the total amount of materials, which is collected by the Contractor and resold as scrap.
- Domestic waste will be generated by approximately 24 workers per day over a period of 6 months during the project construction activities. Workers will utilize public facilities provided by the village or city and use public resources (bins) to dispose of food waste, packaging materials etc.
- Excavated soil is used for backfilling. Small amounts of leftover soil may remain and are disposed of in legal dumpsites as per contract between the Contractor and the supplier

### Hazardous wastes

Some hazardous wastes will comprise of construction wastes as paint containers, batteries, chemicals containers (solvents, lubricants, etc..) and used oils.

### Liquid waste

Liquid waste will comprise mainly of domestic wastewater and vehicle/equipment wash down water. Domestic water is the only continuous source during construction. Workers during the construction phase will use the nearest public washroom or the Mosque's bathrooms.

## 2.8.2 During operation

### **Solid waste**

Solid waste generated from the PRS is expected to be minimal and limited to domestic waste and it will be collected regularly by trucks belonging to Qaha local units.

### **Hazardous waste**

Mainly empty odorant containers and filters- will be treated on-site, transported (using certified hazardous waste vehicles and personnel) to the Egypt gas storage facility in Abu Rawash (Giza) for final disposal at the UNICO hazardous waste facility near Alexandria.

### **Wastewater**

The only wastewater source is domestic wastewater. Wastewater will be collected in a septic tank. The septic tank will be emptied by trucks and disposed of at an authorized wastewater treatment facility.

There is a possibility that the site be connected to the municipal sanitary network in the future.



### 3. Legislative and Regulatory Framework

#### 3.1 Applicable Environmental and Social Legislation in Egypt

- Law 217/1980 for Natural Gas.
- Law 4 for Year 1994 for the environmental protection, amended by Law 9/2009 and law 105 for the year 2015 and ministerial decree No 618/2017
  - Executive Regulation (ER) No 338 for Year 1995 and the amended regulation No 1741 for Year 2005, amended with ministerial decree No 1095/2011, ministerial decree No 710/2012, ministerial decree No 964/2015, and ministerial decree No 26/2016
    - EEAA guidelines on ESIA's preparation
    - EGAS HSE guidelines, LDCs will comply with EGAS HSE Guidelines which work as regulation on PRS construction and operation (provided in [Annex-4](#) from the report)
- Law 38/1967 for General Cleanliness
- Law 93/1962 for Wastewater
- Traffic planning and diversions
  - Traffic Law 66/1973, amended by Law 121/2008 traffic planning.
  - Law 140/1956 on the utilization and blockage of public roads.
  - Law 84/1968 concerning public roads.
- Work environment and operational health and safety
  - Articles 43 – 45 of Law 4/1994, air quality, noise, heat stress, and worker protection
  - Law 12/2003 on Labor and Workforce Safety including Decree 211/2003

#### 3.2 World Bank Safeguard Policies<sup>2</sup>

Three policies are triggered for the project as a whole: Environmental Assessment (OP/BP 4.01), Physical Cultural Resources (OP/BP 4.11), and Involuntary Resettlement (OP/BP 4.12). However, OP/BP 4.11 will not be applicable to this ESIA as there is no cultural resources located in the project area. Concerning OP/BP 4.12, it will not be applicable to the land obtained in Qaha as the process of obtaining the land for the pressure reduction station and the off take was based on mutual consent between the seller and buyer with no encroachment (willing buyer willing seller approach).

##### 3.2.1 World Bank Group General Environmental, Health, and Safety Guidelines & WB Environmental, Health and Safety Guidelines for Gas Distribution Systems-WBG Guideline

The General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines, which provide guidance to users on EHS issues in specific industry sectors. Gaps between requirements outlined by WBG guidelines and the Egyptian Law 4/1994 for Environment protection and the LDCs EHS guidelines have been analyzed. There are no significant differences between the

<sup>2</sup> <https://policies.worldbank.org/sites/ppf3/PPFDocuments/Forms/DispPage.aspx?docid=3694>



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requirements outlined by the WBG EHS GUIDELINE on GAS DISTRIBUTION SYSTEMS and the management and monitoring actions outlined by the ESIA.

In addition to the above-mentioned safeguards policies, the Directive and Procedure on Access to Information<sup>3</sup> will be followed by the Project.

### **3.3 Permits Required**

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- \_ Approval from the ministry of Agriculture to construct the PRS on agriculture land in accordance with the presidential decree number 615 of year 2016.
- \_ Army force permit to construct the PRS.
- \_ Construction permit to be obtained from the local Governmental unit in Qaha - Qalyubia.
- \_ Environmental permit: according to Egyptian Law for the Environment, Law 4/1994 amended by Law 9/2009. EEA approval on ESIA is considered the environmental permit.
- \_ Utility installation permission to the PRS (after construction phase)

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<sup>3</sup> <https://policies.worldbank.org/sites/ppf3/PPFDocuments/Forms/DispPage.aspx?docid=3694>

## 4. Environmental and Social Baseline

### 4.1 Description of the Environment

The PRS is located within Al Hassaniya village at Qaha district, about 200 m east Cairo – Alexandria agricultural Road, about 1500 m south Monshaat Shoubra Hars village, about 2800 m south west of Namool village, 2000 m north Qaha city and about 2700 m west Tersa village

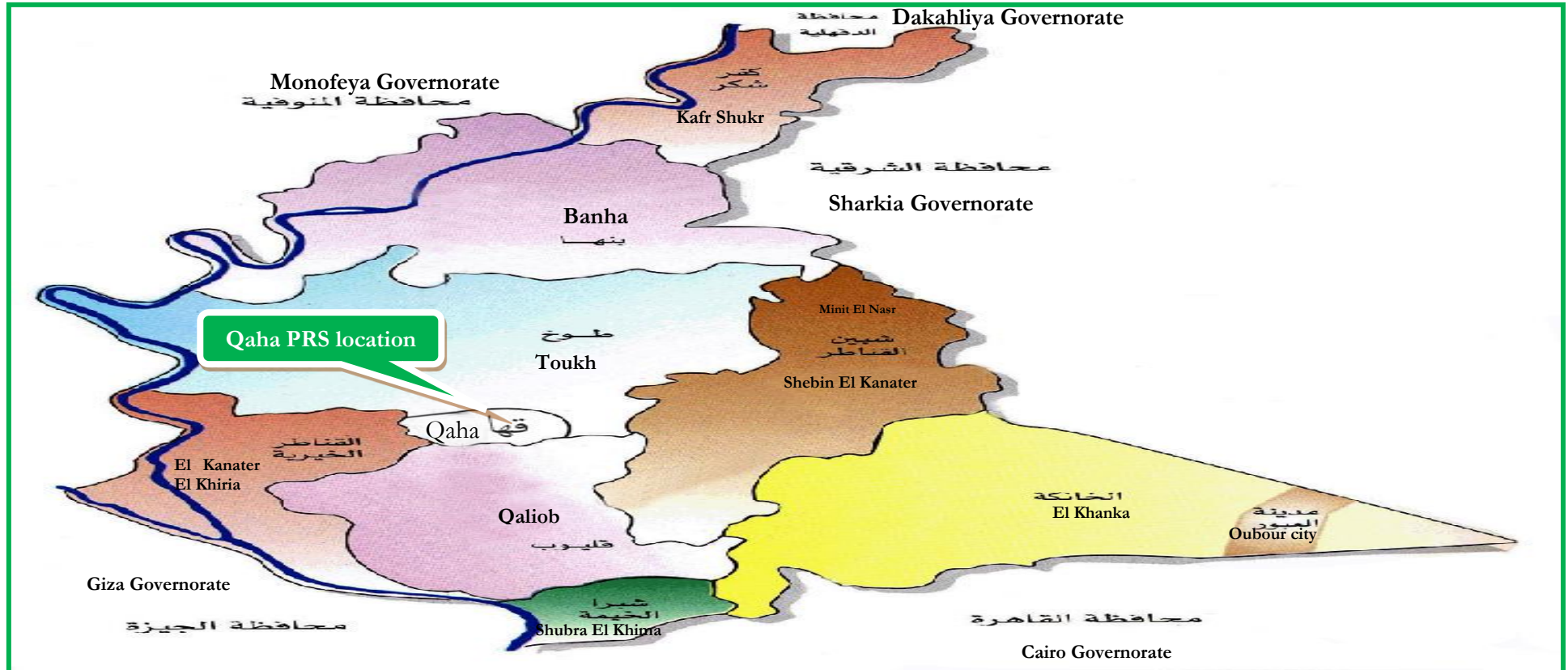


Figure 4-1: Distribution of cities in Qalyubia governorate and proposed Qaha PRS location



The proposed project aiming to construct PRS in Al-Mahfuza village in Qaha District within Qalyubia Governorate.

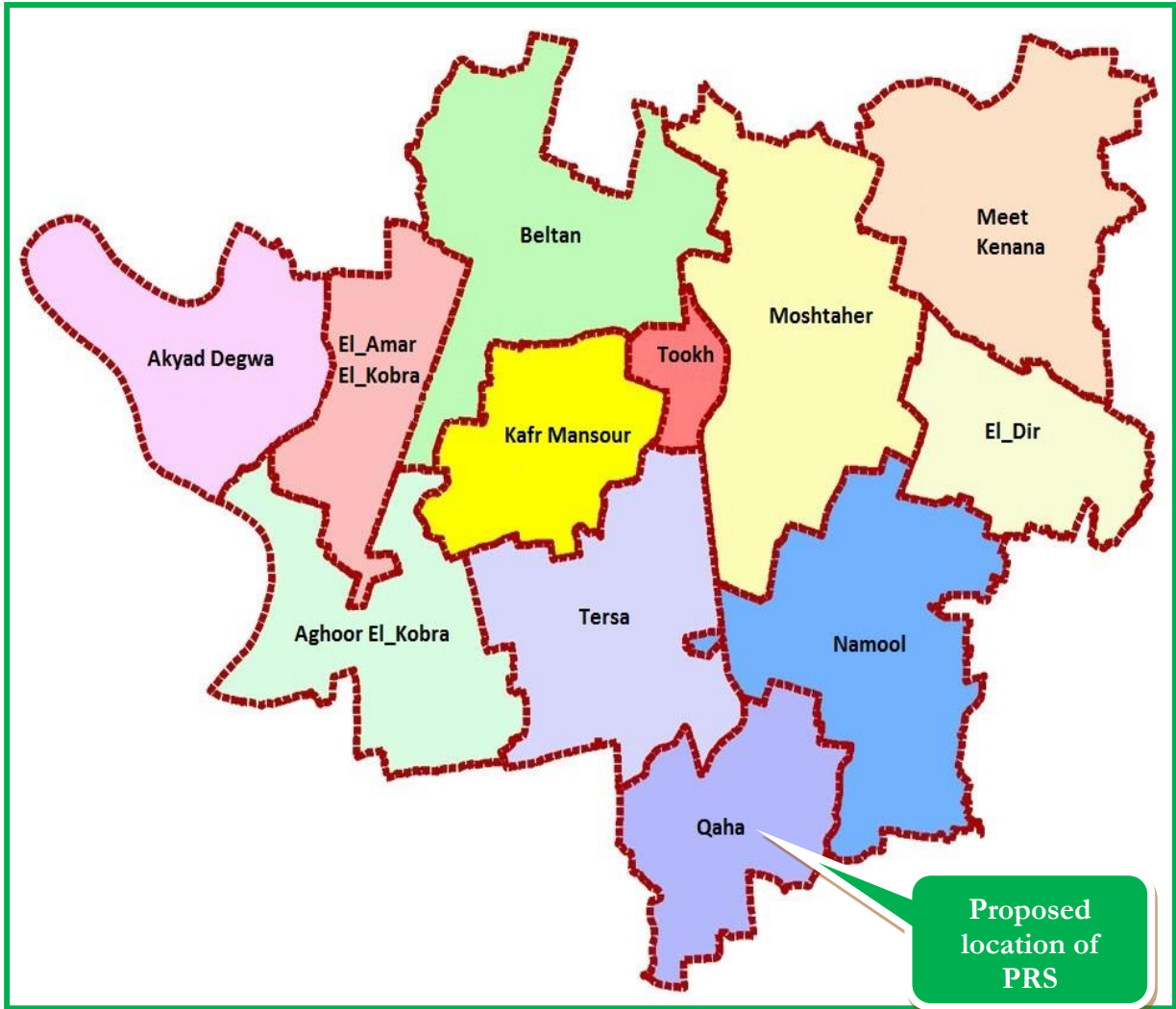


Figure 4-2: A layout showing the location of Qaha PRS.

### 4.1.1 Air Quality

#### Site Specific Ambient Air Quality:

The selection of the active air measurement location is based on the nature of the surrounding activities, the location of the nearest receptors with respect to the project plots, prevailing wind direction, site topography and the future layout of the proposed project components. Moreover, the selection is based on the guidelines stated in the American Society for Testing Materials (ASTM) reference method.

The measurement location was chosen on the basis that it is beside a main road and close to the PRS location.



One-hour average results for 8 hours' continuous measurements were conducted for pollutants of primary concerns, namely, carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), Total Suspended Particulates (T.S.P) and particulate matter (PM10).

**Methodology, instrumentation and results of Ambient Air Quality are detailed in Annex-5** attached to this report

#### **Results of ambient air quality measurements:**

The concentrations of measured air pollutants in the studied areas are below national and WB guidelines. All the measurements for the gaseous pollutants are complying with the maximum allowable limits according to law 4/1994 for Environment protection and its amendments by law No.9/2009 and the executive regulation issued in 1995 and its amendments no. 710 in 2012 and 618 in April 2017". Accordingly, the ambient air quality in the project areas is one of the tolerable areas in Egypt in terms of ambient air quality, which can be attributed to the absence of any major industrial sources.

Construction engines are certified, i.e., exhaust is below permissible levels. Ambient concentrations of gaseous pollutants, NO<sub>x</sub>, SO<sub>x</sub> and CO are unlikely to surpass permissible levels due to operation of construction equipment. Management and mitigation plans for ambient air pollution are further addressed in chapters 6 and 7. During the construction phase, excavation and construction activities will likely cause dust levels to surpass permissible levels at the construction areas. The duration of permissible levels being surpassed will be intermittent for the duration of the workday i.e., 8-10 hours. Management and mitigation plans for dust concentration beyond permissible levels are further addressed in chapter 7.

### **4.1.2 Noise**

#### **Site specific noise measurements**

One-hour average results for 8 hours continuous measurements were conducted for noise level measurements in the same location of the ambient air quality measurements.

**Methodology, instrumentation and results of Noise measurements detailed in Annex-5**

#### **Results of noise measurements**

The noise measurements in the studied areas are below national and WB guidelines. They are complying with the maximum allowable limits according to law 4/1994 for Environment protection and its amendments. The excavation and construction activities may cause noise levels to surpass permissible levels at the site. The duration of permissible levels being surpassed will be intermittent for the duration of the workday i.e., 8-10 hours Management and mitigation plans for noise levels beyond permissible levels are further addressed in chapter 7.



### 4.1.3 Climate

Table 4-1: Average temperature, Rainfall, Relative humidity and Wind Speed at Qaha district<sup>4</sup>

| Factor / Month        | Jan. | Feb. | Mar. | Apr. | May  | Jun. | Jul. | Aug. | Sep. | Oct. | Nov. | Dec. |
|-----------------------|------|------|------|------|------|------|------|------|------|------|------|------|
| Temperature (°C)      | 13.4 | 14.5 | 16.7 | 20.6 | 23.9 | 26.7 | 27.5 | 27.3 | 25.9 | 23.4 | 18.9 | 14.9 |
| Rain Fall (mm)        | 7    | 4.6  | 3.7  | 1.6  | 1.6  | 0.1  | ---  | ---  | ---  | 1.1  | 4.8  | 5.6  |
| Relative humidity (%) | 65.2 | 61.4 | 58.7 | 52.5 | 50.1 | 52.7 | 61   | 64.5 | 62.9 | 62.2 | 66.1 | 65.7 |
| Wind Speed (Km/hr)    | 11.5 | 13   | 14   | 13.7 | 13.7 | 13.3 | 11.9 | 11.2 | 11.2 | 11.9 | 10.4 | 10.8 |

### 4.1.4 Water resources

#### Groundwater:

No Groundwater is anticipated in the PRS proposed location.

#### Surface water:

Qaha PRS is located about 10 km west Damietta Branch. The River Nile Branch represents the main freshwater stream that extends northwards for about 236 km on the Eastern boundary of the Nile Delta from Egypt's Delta Barrage Damietta. The branch has an average width of 180 m and a depth between 2 to 4 m. the nearest canal located beside the PRS location is Khalig Alshamy canal (about 0.16 km west the PRS). Work will be away from the said canal, therefore, there is no impact on water quality of the small canal during the PRS construction or operation phases.



Figure 4-3: Shows Khalig Alshamy canal in Qaha district.

<sup>4</sup> Source: [www.weatherbase.com](http://www.weatherbase.com)





### 4.1.5 Terrestrial Biological Environment:

The current land use for the location of the PRS is for agricultural purposes. Therefore, it is a modified habitat and has no ecological importance, the project area is eventually free from any endangered species as shown in **Figures 4-4 and 4-5**.

#### Flora

There had not been flora recorded in the studied areas except some non- significant exotic species such as *Gaint Cane*, *Mulberry tree*, *Gazwareena* and *Willow trees*.

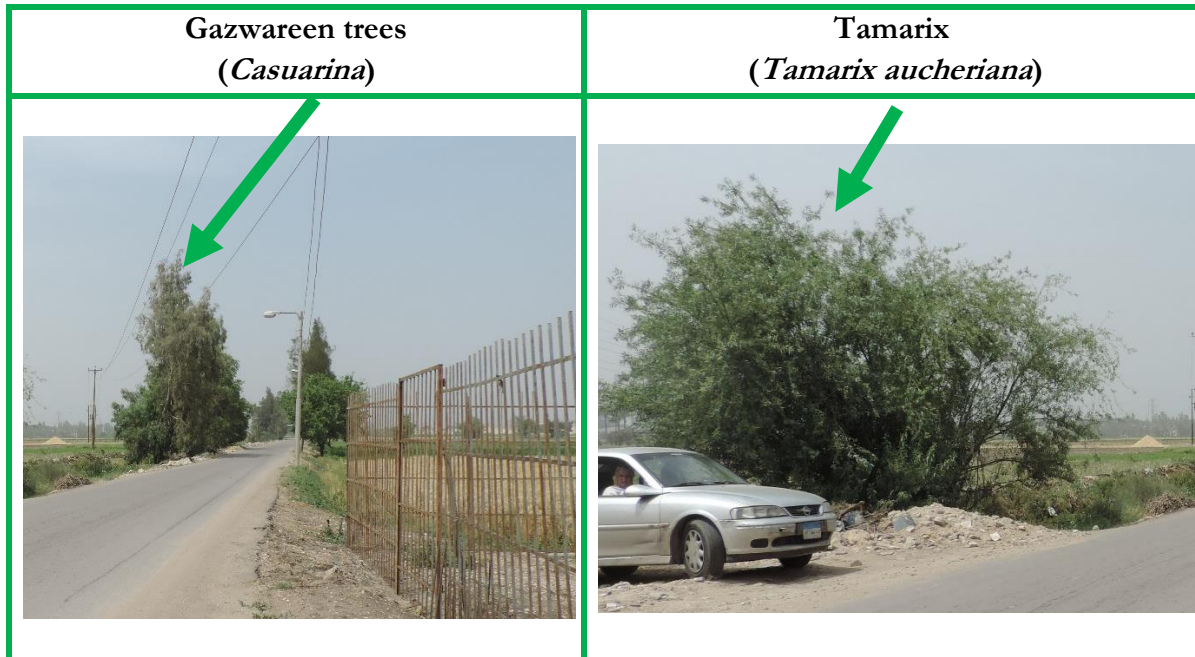


Figure 4-4: Shows flora at Study area.

#### Fauna

In conclusion, the project area is eventually free from any endangered species.

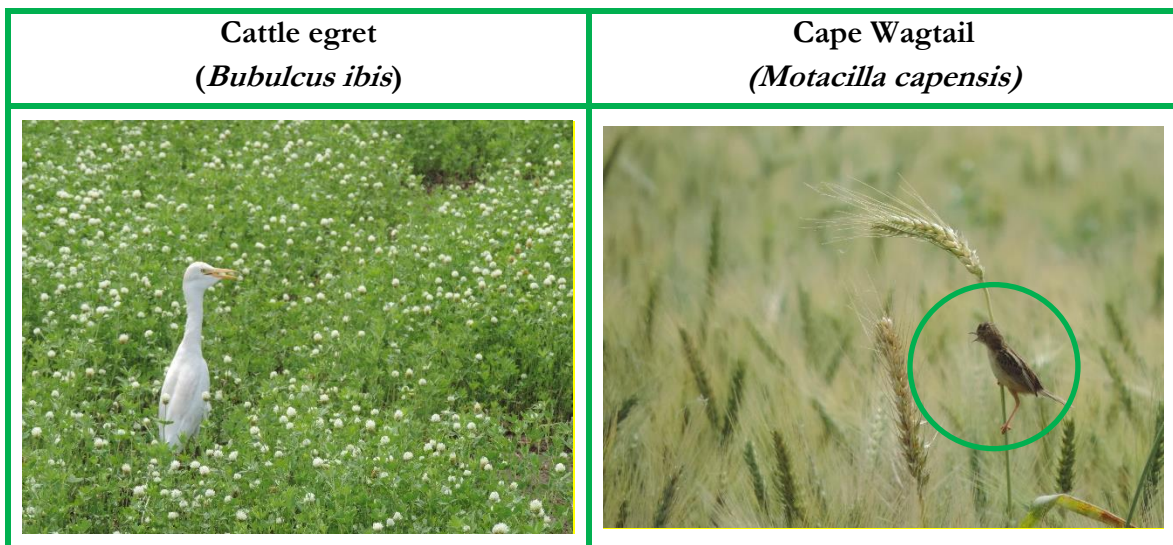


Figure 4-5: Shows fauna at study area taken during PETROSAFE Site Visit



#### 4.1.6 Waste Management:

##### Solid Waste:

The responsibility of service planning, delivery and monitoring in Qaha district is delegated to Cleansing and Beautification Agency managed by Presidency of the City Council.

Solid wastes will be transferred by local units Trucks to Qaha intermediate waste handling area then to be transferred by larger trucks to the main Abu Zaabal dumpsite as follows.



Figure 4-6: Shows Qaha intermediate waste handling area at Qaha district.

##### Liquid Waste:

The project location within Qaha district is well covered by public sanitation network which take all the municipal sewage to be treated in Qaha sewage treatment plant.

People in the streets can use available public sanitary facilities which can be located within the existing mosques, restaurants or any public coffee shops.

##### Hazardous Waste:

There are no hazardous wastes site within Qaha district, any hazardous Waste generated within Qaha will be Temporarily stored in isolated area (in the generated site) and will be transported- by licensed hazardous waste handling vehicles and personnel for final disposal at a licensed hazardous waste facility (Nassreya or UNICO in Alexandria).

#### 4.1.7 Traffic Profile

Qaha district is one of the semi-urban areas in Qalyubia Governorate. Which have many industrial activities. Consequently, the traffic tends to be dense, Qaha congested with private cars, pickup truck, TukTuk, carriage pulled by donkeys, bicycles; motorcycles are the most used transport. TukTuks made traffic conditions in the district worse as they pass in small alleys and in narrow streets. The traffic is congested between 8 a.m. – 11 a.m. and 2 p.m. – 6 p.m. (during winter season) The traffic around the PRS is relatively low.



## Types of roads close to PRS

### Urban Road

The main road closest to the PRS area is Cairo – Alexandria agricultural Road (about 200 m west), Sanhara –Tanan road (250 m east) and port said road (about 500 m west).



Figure 4-7: Shows port said Road

## **4.2 Socioeconomic Baseline**

The Social Impact Assessment (SIA) study is carried out through a combination of desktop and field survey in order to fully describe the social baseline of the Project area. The main methodology for the SIA is semi-quantitative assessment to convey accurate and relevant information for the project area. There has been substantial data gathering on socioeconomic conditions in the area. A number of visits to the project site were conducted during May and July, 2018.

SIA tools were employed during the field trips including observation and interviews with local officials, community leaders, local administrative units, LPG warehouse, local health units, and NGOs.

### **4.2.1 Administrative affiliation**

Qaha district is located in Qalyubia Governorate, and it is very close to Cairo (it is only 25 Km to the north). The total area of Qaha district is 12.3 km<sup>2</sup> and the total population is 47723. According to the Local Governmental Unit LGU of Qaha district, it is followed by 11 villages.

### **4.2.2 Urbanization Trends**

Qaha district is considered as a semi-urbanized area. According to the LGU in Qaha the percentage of individuals living in apartments and modern houses is nearly 71%, while individuals living in rural houses represent only 29%. There are few villages surrounding Qaha, according to the findings of the field research team.

### 4.2.3 Demographic Characteristics

- **Total Population**

According to the (CAPMAS) data 2017, the total population number of Qaha and its villages is 47723 people;

Table 4-3 shows the total population in Qaha district and its villages. The population average annual growth rate is 2% and the total female represents about 49% of the total population number living in Qaha district.

**Table 4-2: Population of Qaha district**

|                   | Male         | Female       | Total        | Percentage of Female (%) |
|-------------------|--------------|--------------|--------------|--------------------------|
| Qaha urban        | 17148        | 16772        | 33920        | 49                       |
| Qaha rural        | 7097         | 6706         | 13803        | 48.5                     |
| <b>Total Qaha</b> | <b>24245</b> | <b>23478</b> | <b>47723</b> | <b>49%</b>               |

Source: CAPMAS Data, 2017.

### 4.2.4 Living Condition

- **Household Size and Density**

A household is defined as “Family (and non-family) members who share residence and livelihood, and operate as one social and economic unit”. The average family size in Qaha district is about 3.8 individuals, which is nearly the same in Qalyubia Governorate level according to the recent figures of CAPMAS, 2017.

- **Dwelling characteristics**

The predominant majority of the people of Qaha District live in modern houses (apartments). The conditions and characteristics of urban houses are in compliance with the bases and preconditions for connecting NG. Almost all of urban houses are built with concrete and red bricks. The majority of buildings in Qaha district is ranged between 3 to 6 stories high. With regard to the legal status of buildings; all buildings and neighborhoods are mostly legal, and some illegal or unplanned neighborhoods were documented by the research team. Regarding the condition of the streets in Qaha District, the average width of main streets range between (2 to 3) lanes wide, and side streets range between (1 to 2) lanes wide. Despite the modest conditions and maintenance of the asphalt, they are mostly paved out and convenient for NG installations in Qaha District.



**Figure 4-8: Pictures showing Building & Streets Condition in Qaha District.**



- **Access to the Basic Services**

According to the Data provided by LGU, accessibility to electricity, water and sanitation networks is widespread in Qaha and its villages, as 100% of individuals have access to the public electricity network, and 100% of individuals have access to the public water network, and have also tap water inside their houses. However, the coverage of the public sanitation network is ranged between 70% - 100% in Qaha district. The PRS will be connected to basic services.

#### 4.2.5 Human development profile

Educational, human activities, poverty index, and income & expenditure should be highlighted in order to determine the current socioeconomic conditions of Qaha district.

- **Education**

According to the (CAPMAS) data 2017, the level of education is relatively high (comparing to other areas in Egypt) in Qaha district. The percentage of individuals who finalized their intermediate education is about 35%. The percentage of individuals who having university degrees is about 11.5%. The illiteracy rate tends to be not very high, it is nearly 24%. There is a significant gap between the illiteracy rate of males and females, as females' illiteracy rate is (29 %) while it is only about 19% between males. The education level -especially the percentage of illiterate- is very important to choose the suitable channels to share the information with the community.

- **Human activities in the Project Areas**

According to the data supported by the LGU in Qaha district, Qaha is considered as a main area for agriculture and industrial activities. It is famous of food and beverage industries, in addition to some others industries such as clothes & wool industries. Also the agriculture activity (which absorbs about 40% of the labor force) supplies the required vegetables and fruits to the local factories. So Connecting NG to such district will help so much for achieving the social and economic development plans, and participate strongly to raise the standard of living of the people.

- **Poverty, Income and Expenditure**

According to the data supported by LGU and CAPMAS Poverty Mapping, 2013, the percentage of poor people in Qaha district is relatively very low (10%), and the percentage of female-headed households is nearly 10%. According to the Focus group discussions revealed that the average family expenditures is about 4000 EGP per month. Most of the families are suffering of the high price of energy bills (both of electricity and LPG).

Male and female participants of the focus group discussions grumbled about the recent bulge in electricity bills which range between 200 to 300 EGP. More importantly, the cost of their consumption of LPG cylinders has increased after latest jump of the LPG price last July, 2019. The current formal price of LPG is 65 EGP, and the average LPG consumption is (1-3) cylinder/month for each household.



#### 4.2.6 Unemployment Rate

In Qaha district, the percentage of manpower that joined labor force at the age of 15 years old and above is 40%. The unemployment rate stands at about 7%. In the same respect, female employment figures show female unemployment rate at 27 %. The percentage of female workers who joined labor force at the age of 15 years old and above is 25%.

The formal Statistics obtained from the CAPMAS regarding manpower reflected that the age of starting work is 15 years old.<sup>5</sup> Both the Child Law and the Labor Law state that children shall not be employed before they complete 14 years old, nor shall they be provided with training before they reach 12 years old; however children between 12 and 14 years old are permitted to work as trainees. Furthermore, the governor concerned in each governorate, in agreement with the Minister of Education may permit the employment of minors aged 12-14 years in seasonal work which is not harmful to their health and growth, and which does not conflict with regular school attendance. Consequently, there is always a high probability to detect child labor in most of the projects implemented in Egypt. In the project areas where agriculture work and sales activities are in place, there is a big number of underage laborers were noticed. As a conclusion, there is a high risk that the contractors might employ young people below 18 years old.

**Therefore, rigid restrictions to employ this category must be added to the contractor obligations.**

#### 4.2.7 Health Facilities

Qaha district has one public and central hospital, also there are one medical and health unit, in addition to 20 private clinics and a medical center for emergency cases. Providing health facilities is very important to save the workers during accidents and emergency cases. All contractors are obliged (according to the signed agreements with LDC) to provide the necessary medical services to the workers. Also, Egypt Gas in the emergency cases provides the worker with all the required medical services.

#### 4.2.8 Physical cultural Resources

The PRS in Qaha, which characterized as agricultural land. there are no identified archeological sites or sites with cultural or historical value, located within the project area shall be affected by the PRS construction works. For this reason, it is presumably less likely to chance find any artifacts or antiquities in the construction areas, however in case of any unanticipated archeological discoveries within the project areas; [Annex-6](#), entitled 'Chance Find Procedure,' details the set of measures and procedures to be followed in such cases.

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<sup>5</sup> Based on Labor law number 12 of year 2003 and The Child Law (No. 12, 1996). There are certain critical obligations to recruit children below 15 years old. Article 98-103 of Labor law put limitations related to age, type of occupation, hazards work...etc



## 5. Environmental and Social Impacts

The environmental and social impact assessment (ESIA) is a process used to identify and evaluate the significance of potential impacts on various environmental and social receptors as a result of planned activities during (construction and operation) phases of the Project. Furthermore, the analysis of environmental and social impacts is important to detail an effective management and monitoring plan, which will minimize negative impacts and maximize positives. The evaluation of the potential impacts on various receptors is based on a significance ranking process described in the following subsection. Details presented in [Annex-7](#) attached to this report.

### 5.1 Impact Assessment Methodology

To determine and assess the impacts of the project phases on environmental and social receptors, a semi-quantitative approach based on Leopold was first adopted. The impact of each activity on each receptor was assessed according to magnitude on a scale of -10 to 10, where negative values indicate a negative influence on the receptor, and importance on a scale of 0 to 10, which encompasses the probability of occurrence, frequency of the impact etc. The numbering system is used as a relative measure, where more negative numbers correspond to impacts having a higher negative magnitude. Susceptible receptors and corresponding activity are deduced and addressed if both magnitude and importance are of minor severity. The impact assessment methodology adopted for this ESIA is a “cause-effect” matrix modified from Leopold; and Buroz’s Relevant Integrated Criteria to evaluate the impacts. The environmental impact assessment methodology encompasses a semi-quantitative assessment that considers the following:

- Probability of the impacts
- Spatial and temporal scale
- Intensity of the impacts (which also considers the sensitivity of receptors, and the reversibility nature of the impact)

#### **Each impact was identified considering:**

- Type of impact: The negative or positive influence on the receptor.
- Magnitude: The extent of the impact within a scale (0-10)
- Significance: That includes the probability of occurrence, frequency, intensity of the impact, etc., within a scale (0-10)

The “cause-effect” matrix identifies the impacts during the mentioned phases, considering the elements of the environment and social context (receptor of the impact).



Table 5-1 Impact Assessment Methodology

| Importance of Impact | Impact Rating   | Color Code |
|----------------------|---|------------|
| 0-25                 | None or irrelevant (no impact);   |            |
| 26-50                | Minor severity (minimal impact; restricted to the work site and immediate surroundings);                      | Yellow     |
| 51-75                | Medium severity (larger scale impacts: local or regional; appropriate mitigation measures readily available); | Orange     |
| 76-300               | Major severity (Severe/long-term local/regional/global impacts; for negative impacts mitigation significant). | Red        |

*Detailed impact assessments results presented in two tables in Annex-7.*

## 5.2 Impacts during Construction

### 5.2.1 Positive impacts

#### 5.2.1.1 Impacts related to employment

The project will result in positive impacts through the provision of job opportunities.

##### – Provide direct job opportunities to skilled and semi-skilled Laborers

The construction of Qaha PRS and Off-take is expected to result in the creation of job opportunities, both directly and indirectly. Based on similar projects implemented recently by EGAS and Egypt Gas, the daily average number of workers during the peak time will be about 16 workers, being 14 laborers and 2 supervisors. The workers can also include drivers, digging staff, technicians and welders. About half of them can be recruited from the local community.

##### – Indirect benefits

As part of the construction stage, many indirect benefits expected to be sensed in the targeted areas due to the need for more supporting services to the workers and contractors who will be working in the various locations. This could include, but will not be limited to accommodation, food supply, transport, trade, security, manufacturing... etc. For example, the transportation of workers from Mansoura to Qaha will work for the benefit of car lease offices.

### 5.2.2 Negative Impacts

The process of environmental impact assessment during construction phase indicate that some receptors have irrelevant impacts; those receptors include; Surface water (Khalig Alshamy canal will not be affected by construction activities), Ground water, Ecological (fauna or flora), vulnerable structures, and cultural vulnerable sites. The receptors which might be affected during the construction phase will be as follows:





### 5.2.2.1 Deterioration of soil quality

The excavation activities will result in the disturbance of soil characteristics and cause soil erosion and soil compaction as a result of heavy equipment take place. In addition, potential soil contamination may occur as a result of oil spills and leaks.

The proposed project is located in an agriculture area meaning the sensitivity of the receptor is considered high. The duration of the impact is expected to be long-term, with its spatial extent being limited to the boundaries of the Project site.

The impact on soil considered **medium severity**.

### 5.2.2.2 Air Emissions

PRS installation of the equipment will include several activities such as excavation, land clearing, concrete foundations, transportation of construction material and equipment, burial of cables and pipes, etc.

Those activities in consequence are expected to emit air pollutants to the ambient air, however it will be conducted for a short period. The following air pollutants are foreseeable for most of the construction activities:

- Fugitive dust emissions (PM10, PM2.5)
- Exhaust from excavation equipment and heavy machinery (excavators, loaders, trucks) containing SO<sub>x</sub>, NO<sub>x</sub>, CO, VOCs, etc.

Dust emissions will slightly negatively impact ambient air quality, particularly during the initial phases of construction. An isolating radius will be created around any residential area. Therefore, it is expected that the dust impact will be moderate slightly impact the surrounding area (agriculture land). Soil characteristic at PRS site is mainly hard soil. In addition, Sanhara –Tanan road (250 m west away) already paved.

Emissions of CO<sub>2</sub>, CO and PM will result from the operation of the construction machinery and road vehicles during construction of the PRS. Air pollutants emitted from construction machinery are generally temporary (during the working activities). The intensity of work activities and the number of vehicles traveling onsite would be relatively low for all tasks. The emissions will be mostly limited to the construction phase and therefore are temporary.

Therefore the impact is assessed as **medium**



5.2.2.3 **Noise**

Construction of the PRS will require using various construction equipment, vehicle, etc. in addition to the other activities that generate noise. These tools signify potential major sources of noise emissions that will have an impact on receptors.

The potential people groups who are susceptible to the construction noise during the construction of the Qaha PRS are the following:

- Onsite Workers
- Neighbor farmers

It is worth mentioning that the proposed PRS site is located about 200 m east Cairo – Alexandria agricultural Road, where the noise baseline is already high but does not exceed the national and international standards. Construction activities may increase the already existing baseline ambient noise. However, increased noise emissions are anticipated to be for a short duration of time.

The main sources of noise and vibration during the PRS construction are the operation of the construction equipment and machinery such as diggers, cranes, loaders; farmer in the nearby agriculture land and worker are the main receptor.

Regarding the construction of the PRS it is expected that the generated noise will mainly have an impact on workers and Neighbor farmers.

The impact of construction for worker and neighbor farmers is assessed **medium**

5.2.2.4 **Impact on worker health and safety**

Potential health and safety impacts are expected to workers during construction of the Qaha PRS., in general, are the same as those associated with any construction project involving earthmoving, use of large equipment, transportation of overweight and oversized materials, and construction and installation of facilities.

The occupational health and safety impacts is assessed as **medium**

5.2.2.5 **Impacts due to COVID-19 pandemic**

Coronavirus Disease 2019 (COVID-19) is a respiratory disease caused by the SARS-CoV-2 virus. It has spread from China to many other countries around the world. Depending on the severity of COVID-19’s international impacts, outbreak conditions—including those rising to the level of a pandemic—can affect all aspects of daily life, including travel, trade, tourism, food supplies, industrial and financial markets.

During construction of the Qaha PRS, Movement of staff inside and outside the project borders can increase the risk of transmission of COVID-19 to the workers and Community health.

Infection with COVID-19, can cause illness ranging from mild to severe and, in some cases, can be fatal. Symptoms typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all. Symptoms of COVID-19 may appear in as few as 2 days or as long as 14 days after exposure.

The occupational health and safety impacts is assessed as **Medium**



### 5.2.2.6 Temporary Labor Influx

Generally speaking, having workers in small cities might result in unfavorable impacts on the available resources (e.g. pressure on accommodation, food, health care and medication and potable source of water). It may also result in inconvenience to the local communities, particularly in the areas where communities are conservative or not accustomed to having outsiders. Only limited number of workers exist in each of the location during working hours, portion of those workers are local workers and that the LDCs are imposing rules and code of conduct on the contractors to ensure good behaviors and limit any potential conflict with the communities.

The impacts related to Labor Influx will be **medium**.

### 5.2.2.7 Child Labor

As mentioned in the baseline, child labor is a common practice in the project communities in the project areas. Children below 18 works almost in all projects as they receive low salaries and they are less demanding. This risk should be carefully handled in the ESMP and restrict obligations and monitoring should be applied in the contractor obligations.

Child Labor risk is assessed as **Minor-medium**

### 5.2.2.8 Inappropriate waste management

Normal construction non-hazardous solid wastes include scrap concrete, steel, bricks, packaging waste, used drums, wood, scrap metal, welding belt and building rubble will be generated. Domestic wastes by construction Labors, including sewage and garbage collected from the Labors onsite will be also generated. if those wastes not disposed to adequate sites, it will lead to a negative environmental impact.

Solid hazardous waste generated is likely to include empty containers, spent welding materials, solvents, paints or adhesives, and other hazardous waste resulting from operation and maintenance of the equipment and vehicles, i.e. spent oils, spent lube, waste oil filters, batteries, etc. Among the hazardous wastes also are the wasted or faulted materials.

Adverse impacts on the environment from the possible improper disposal of the solid wastes and hazardous waste.

Therefore, impact is assessed **medium**

### 5.2.2.9 Traffic impact

The greatest potential for traffic impacts to occur arises during the short period where construction works peak (transportation of raw materials, equipment, and foundation materials). The traffic flow that will be created during the construction period will to some extent depend on which type and number of trips to and from the proposed site. Additional activities, such as entering and exiting the site will not have significant impacts on the road; given the entrance to proposed PRS Sanhara – Tanan road. Off-take site is located inside the PRS boundaries.



Based on observation during the site visits, it is predicted that during transportation of the equipment and raw materials, only one lane will be used by the trolleys and the movement of one trip will not last more than 8 hours (during the midnight – morning).

Therefore, impact on traffic in the project site is assessed **medium**

#### 5.2.2.10 Impact on Ground water

Ground water may be impacted in case of improper disposal of sanitary wastewater, construction wastes or debris (generated from activities like ditching, and excavation). Generated sanitary wastewater, as well as water resulting from the dewatering activities (if existing) during excavation, will be collected in tanks and transported via a certified contractor to the nearest wastewater treatment station.

Therefore, the impact is assessed **minor**

#### 5.2.2.11 Community health and safety

The proposed project site is located approximately 500 m from the nearest residential building and therefore the impact on the community as a result of exhaust gas emissions, dust and noise are predicted to be significant. However, the impact is likely to be temporary and short term.

Therefore, the impact is assessed **minor**

#### 5.2.2.12 Land related impact

The PRS needed a plot of land 3440 m<sup>2</sup> (approximately 19.66 Qirats). The plot of land obtained in accordance to a willing buyer willing seller approach as mentioned in (2.5.4-Land acquisition for PRS). EGAS procedures for land acquisition have been adopted to choose one plot of three alternatives lands. A survey for market price was conducted by LDC and EGAS social officers. The average price ranged between 40 to 50 thousand EGP/Qirate in the surrounding area, based on the cost estimation analysis carried out by the LDC, and after a long negotiation with the land owner, the land was purchased at a total cost of 2,175,000. EGP (approximately 110630 EGP/Qirate). (land related documents are attached in Annex-8) to this report. Also, there is no land needed for the off take where it is will be in the selected land.

Therefore, the impact is assessed **minor**

### 5.3 Impacts during Operation

#### 5.3.1 Positive impacts

##### 5.3.1.1 Impacts related to employment

The project may result in the creation of job opportunities during the operation phase.

- **Provide direct job opportunities to skilled and semi-skilled laborers**

The operation of Qaha PRS and Off-take expected to result in the creation of job opportunities. The average number of workers during operation of the Qaha PRS will be



about 12 workers in two shifts (6 workers/ shift) from the permanent workers of the LDC; 4 technicians, 2 engineers and 6 security staff. In addition to that, 4 police staff will be recruited permanently to guard the PRS. With regards to health and safety, one person will be assigned from the staff of Egypt Gas.

**5.3.2 Negative impacts**

Various impacts assessed in accordance to the impact assessment methodology.

The project relevant impacts will be as follows:

**5.3.2.1 Impact on worker health and safety**

Possible impacts to health and safety during operations include exposures to odorant release, gas leak, fire, noise and accidental injury to workers. In addition; health and safety issues, working around energized equipment, and possible contact with natural hazards. However, during the operation and maintenance phase, if there is any incident or emergency situation after applying all the control measures and safety precautions in the EGAS HSE guidelines (Annex-4), the impact will negatively endanger the surrounding community and establishment.

Odorant handling is part of the operation of the PRS and is addressed in a Quantitative Risk Assessment (Annex-3) attached as a separate study. An odorant is added to the NG in order to enable detection upon leakage. The odorant containing Tertiobutylmercaptin (80%) and Methylenehydrosulphide (20%) is classified as a hazardous substance.

Odorant leak can result from improper handling of the odorant includes: Storage in unsafe conditions, in terms of occupational health and safety. In case of emergency, the risk resulting from odorant release or gas leak will be managed by Qaha PRS's emergency response plan.

Therefore the impact is assessed as **medium**

**5.3.2.2 Impacts due to COVID-19 pandemic**

During the operation of the Qaha PRS, Movement of staff inside and outside the project borders may increase the risk of transmission of COVID-19 to the workers and Community health.

Given the fact that the average number of workers during operation of the Qaha PRS will be about 6 workers/ shift from the permanent workers (well trained) of the LDC and maintain social distancing.

The Infection with COVID-19 between workers or from workers to the community is relatively minor but still more precaution can be applied.

The occupational health and safety impacts is assessed as **Minor**

**5.3.2.3 Hazardous and non-hazardous waste management**

During operation and maintenance of the PRS, besides industrial hazardous (odorant containers) and non-hazardous waste, small quantities of domestic waste (solid and liquid waste) will be generated. Industrial hazardous waste is likely to be generated during routine operations (e.g.,



lubricating oils, odorant containers, chemical containers). These wastes are typically stored temporarily, and transported by a licensed contractor to an appropriate permitted off-site disposal facility as a standard practice, according to EEAA regulations for hazardous waste management.

Therefore the impact is assessed as **medium**

#### 5.3.2.4 Noise impact

The pressure reducers normally cause noise generated from the reducers pipes. Maximum noise level expected from the reducers is 80db. The generated noise is constant (not intermittent). Assuming ambient noise levels are complying with WBG requirements and Law 4/1994-9/2009-105/2015 standards for low noise residential areas, a 20-meter buffer distance kept between the reducers and the PRS fences should lead to minimal impact outside the PRS borders. Additionally, the PRS is located at about 200 m east highway road (Cairo – Alexandria agricultural Road).

Therefore, the impact is assessed as **minor**

### 5.4 Impacts during Accidental Events (Operation Phase)

Regarding to the Quantitative Risk Assessment Study (QRA), which demonstrate on the following hazards:

- Gas Release
- Fires (Heat Radiation)
- Explosion (Overpressure Waves)
- Suffocation (Odorant Leak)

And referring to the risk calculations determined in Qaha QRA study, the individual risk level to the exposed workers / public based on the risk tolerability criterion have been identified in Acceptable (Lower Tolerability Limit<sup>6</sup>) region. So, there are some points (Study Recommendations) need to be considered to keep the risk tolerability, and this will be described under item (7.4) (for more details refer to the QRA Study under [Annex-3](#)).

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#### <sup>6</sup> ***Lower Tolerability Limit***

*Which the risks are broadly tolerable to society and comparable to everyday risks faced by the public. If the overall risk is below the Lower Tolerability Limit, the ALARP Assessment is likely to be straightforward and limited to ensuring compliance with Good Practice. Below the Lower Tolerability Limit, the principal risk management concern is the maintenance of existing risk reduction measures to avoid degradation.*

**Table 5-2 Impact Assessment**

 Detailed impact assessments results are presented in two tables in [Annex-7](#).

| Impact                        | Description   | Type     | Significance |
|-------------------------------|---|----------|--------------|
| <b>During Construction</b>    |   |          |              |
| Deterioration of soil quality | PRS construction will lead to degradation of soil quality, Excavation and movement of heavy machinery on unpaved surface soils during site preparation and foundation-laying could cause a physical breakdown of soil particles potentially causing destabilization of the soil structure.  | Negative | Medium       |
| Air emissions                 | WBG requirements and Law 4/1994 (modified by laws 9/2009 & 105/2015) stipulates strict air quality standards. Air emissions (gases and particulates) during construction (from transportation and machine operation) shall arise from: <ul style="list-style-type: none"> <li>- Particulate matter and suspended solids from excavation/backfilling operations</li> <li>- Possible dispersion from stockpiles of waste or sand used for filling excavations.</li> <li>- Exhaust from excavation equipment and heavy machinery (excavators, trenchers, loaders, trucks) containing SOx, NOx, CO, VOCs, etc.</li> <li>- Traffic congestions resulting from road closure or slowing down of traffic due to excavation works.</li> </ul> <u>Dust</u><br>The impact of dust generation (particulate matter) will be limited to the working hours as excavation and other construction activities. Which lead to temporary reduction of air quality, however is unlikely to cause major air emissions impacts as the nearest receptors (Qaha buildings) around 500 m away from the construction site. | Negative | Minor        |
|                               | <u>Gaseous pollutants emissions</u><br>Provided machinery used during construction is certified and maintained as per guidelines, the increase in emissions stemming from the exhaust of machinery is unlikely to increase ambient levels beyond national and WBG permissible levels.   | Negative | Minor        |
|                               | <u>Noise impact on worker</u><br>Noise impacts on construction workers, technicians and engineers in direct vicinity of the excavation works and heavy machinery are considered more significant than those on residents.   | Negative | Medium       |
| Noise                         | <u>Noise impact on nearby farmers</u><br>Noise impacts on farmers in nearby agriculture land will be affected by the increased noise levels during the construction phase.  | Negative | Medium       |
|                               | No major noise impacts on the nearest receptors expected during construction of the PRS and Off-take as they are around 500 m away and the construction period is limited.  | Negative | Minor        |

| Impact                                  | Description   | Type     | Significance |
|---|---|----------|--------------|
| Risks on Occupational health and safety | Inhalation of air pollutants, high noise levels, injuries and potential death as a result of operating heavy equipment, and handling hazardous materials.   | Negative | Medium       |
| Impacts due to Covid-19 pandemic        | During construction of the Qaha PRS, Movement of staff inside and outside the project borders can increase the risk of transmission of COVID-19 to the workers and Community health.  | Negative | Medium       |
| Impacts related to Labor Influx         | If not properly managed, there is a risk that labor inappropriate behaviors or misconduct might pose negative impacts on the community groups, particularly on women, children and other vulnerable groups (including inconvenience and impacts on the work site).  | Negative | Medium       |
| Child Labor                             | As mentioned in the baseline, child Labor is a common practice in the project communities in the project areas. Children below 18 works almost in all projects as they receive low salaries and they are less demanding. This risk should be carefully handled in the ESMP and restrict obligations and monitoring should be applied in the contractor obligations  | Negative | Minor-Medium |
| Waste generation                        | Inappropriate waste disposal and improper management of construction waste materials which could lead to spillages that will cause soil contamination.<br>Excavated soil and concrete/bricks waste are inert materials. Improper disposal of such wastes will only have aesthetic effects on the disposal site. The legal standards of Law 4/1994-9/2009-105/2015 for the Environment and Law 38/1967 stipulate that these wastes should be disposed of in licensed sites by the local authority, which minimizes any aesthetic effects of such waste.<br>Hazardous materials available onsite during construction activities are likely to include fuel, engine oil, paints, Poor handling of those materials and their inappropriate storage may result in poor containment of induced leaks. | Negative | Medium       |
| Reduction of Traffic Flow               | The traffic flow that will be created during the construction period will to some extent depend on which type and number of trips to and from the proposed site. Additional activities, such as entering and exiting the site will not have significant impacts on the road (Sanhara –Tanan road) which has a low traffic.  | Negative | Minor        |
| Ground water pollution                  | Ground water that might exist in area may be affected by inappropriate management of liquid and hazardous waste during construction.  | Negative | Minor        |
| Risk on Community health and safety     | Negligent workers may cause accidents harmful to the community members, particularly children and old people, especially close to the digging site. Impacts associated with Community Health and Safety are limited to the inside the fence of the PRS. Therefore, there are minor impacts related to community health and safety during construction.  | Negative | Minor        |



| Impact                                  | Description  | Type     | Significance |
|---|--|----------|--------------|
| Impacts related to lands                | The proposed PRS required a plot of land 3440 m <sup>2</sup> including off take needed area. Plot of land obtained in accordance to willing buyer willing seller approach.   | Negative | Minor        |
| <b>Operation</b>                        |  |          |              |
| Risks on Occupational health and safety | At PRS site, inhalation of air pollutants (odorant or natural gas leak), injuries and potential death as a result of operating equipment with high pressure tools and equipment and handling hazardous materials.<br>In case of emergency / accidents, resultant risks are studied in details in the attached Quantitative Risk Assessment, that show that the required mitigation measures are already in place and no further measures are needed<br>In cases, where further mitigation measures are required, action plans are set for implementation and follow up by the concerned departments.   | Negative | Medium       |
| Impacts due to Covid-19 pandemic        | During the operation of the Qaha PRS, Movement of staff inside and outside the project borders may increase the risk of transmission of COVID-19 to the workers and Community health.<br>Given the fact that the average number of workers during operation of the Qaha PRS will be about 6 workers/ shift from the permanent workers (well trained) of the LDC and maintain social distancing.  | Negative | Minor        |
| Hazardous material and waste            | <b><u>Hazardous material</u></b><br>Odorant handling will be according to Odorant Material Safety Data Sheet (MSDS) and Egypt Gas procedures.<br>Odorant leak can result from improper handling of the odorant and storage in unsafe conditions, in terms of occupational health and safety. According to Qaha QRA study, modeling the vapour release will extend outside the PRMS SE fence, and Egypt Gas Qaha PRS ERP will cover this point.<br><b><u>Hazardous waste</u></b><br>During operation and maintenance of the PRS, industrial hazardous wastes will be generated (e.g., lubricating oils, odorant containers, chemical containers). Poor waste management practices may have a significant impact on environment (soil, Ground water, visual, and health and safety). | Negative | Medium       |
| Noise                                   | The pressure reducers normally cause noise. Maximum noise level expected from the reducers is 80 db. The generated noise is constant (not intermittent).   | Negative | Minor        |



## 6. Analysis of Alternatives

### 6.1 No Project Alternative

The main target of the proposed project is to supply natural gas to households in Qaha district and other surrounding areas in the future. This Natural Gas Connections to Households Project expected to yield many economic and social benefits in terms of providing a more stable, energy source, achieve savings in LPG consumption and enhancing safety in utilizing energy.

**The No-Project alternative is not favored as it simply deprives the Egyptian Public and Government of the social, economic, and environmental advantages.**

### 6.2 Technology Alternatives

#### 6.2.1 Outlet Pressure

The Pressure Reducing Station (PRS) will reduce the Natural Gas pressure from 30-70 bar in the HP pipeline to 3 – 7 bar to be suitable for distribution or use in domestic or industrial applications.

Qaha PRS will produce 7 bar outlet pressure for the local distribution network (intermediate pressure). The LDC choose to produce 7 bar instead of 4 bar due to high consumption rate expected in Qaha city. It is designed to accommodate future extensions in order to feed other cities and/or villages surrounding Qaha district.

#### 6.2.2 Odorant Handling

Environmental and safety control considerations and measures are integrated into the selected technology design. For example, in order to reduce emissions from the odorant unit, the odor will be automatically added or by using a plunger pump. Automatic and sophisticated unit management systems ensure safe and easy operation and can encompass complete remote operation of the units.



### 6.3 Location Alternative

As mentioned in item 2.5.3 (construction works of PRS) and item 5.2.2.11 (Land related impact), the main criteria for PRS siting are:

- Proximity to High-pressure gas main lines to minimize Off-take length
- Availability of space with adequate dimensions and affordability of the land for PRS construction and possible expansion
- Presence of standard buffer zones between PRS and nearest buildings or receptors
- According to EGAS/LDC land acquisition procedure, it is the priority of EGAS as an asset holder, to acquire State Owned Lands that are free of any uses (both formal and informal. EGAS never resorts to the land expropriation decrees in PRSs selection. In cases of unavailability or in case the available land is technically unacceptable, private land is usually used as a second a resort and willing Buyer Willing Seller basis will be applied. Due to the unavailability of state-owned lands, EGAS/Egypt Gas followed EGAS procedure for acquiring land for the construction of the PRS on Willing Buyer – Willing Seller basis and no involuntary land acquisition took place.
- Three alternatives of privately-owned lands were inspected. The agreed land was technically and socially acceptable, as it is lies on top of the HP pipeline and entails no further land acquisition compared to the other two alternatives that require purchasing more land.
- Consultation with the land owners were conducted during the committees visits also further consultation were conducted with the other neighboring land owners to determine the prevailing price (market price) of the land in the targeted area. Prevailing price ranged from 40 to 50 Thousand EGP/Qirate, considering the current situation that the land is for agricultural purposes. Consultation meetings also reflected the future expectation of the landowners in this area that the land could be used in the near future for construction of buildings that is of more value than the current land status (agricultural).
- Based on the cost estimation analysis carried out by the LDC, and after the negotiations with the landowner, the land was purchased at a total cost of 2,175,000. EGP (approximately 110630 EGP/ Qirate) and a cheque was issued and received by the land owner.



## 7. Environmental and Social Management & Monitoring Plan

### 7.1 ESMMP Objectives

The Environmental and Social Management and Monitoring Plan (ESMMP) consists of a set of mitigation, management and monitoring measures to be taken during implementation of the project to avoid, reduce, mitigate, or compensate or offset any adverse social and environmental impacts analyzed in the previous chapter. The ESMMP distinguishes between mitigation measures and monitoring that should be implemented during the construction and operation of the project.

The ESMMP identifies certain roles and responsibilities for different stakeholders for implementing, supervising and monitoring the environmental and social performance of the project as well as some of their estimate costs during its life cycle. Roles and responsibilities for implementing the ESMMP during the construction and operation phases have been proposed. During construction EGAS/LDC will assign supervision staff who will undertake supervision over the contractor to make sure that the mitigation measures specified in the design/tender document are implemented on field. During the operation phase, the PRS shall have at least one permanent staff member for health, environment and safety.

**Overall, the following Environmental and Social measures are complementary to and do not substitute compliance to the detailed HSE guidelines, procedures, and actions adopted by EGAS and its subsidiary LDCs [Annex-4](#). Attached to this report**

In the following Management and monitoring measures, the term Local Distribution Company (LDC) refers to the gas company in charge of project implementation: **Egypt Gas.**



## 7.2 Environmental and Social Management Measures

Table 7-1: Environmental and Social Management Matrix during CONSTRUCTION

| Receptor          | Impact         | Mitigation measures   | Residual impact | Institutional Responsibility for Implementation |                      | Means of Supervision                             | Estimated Cost of mitigation / supervision   |
|-------------------|----------------|---|-----------------|---|----------------------|--|--|
|                   |                |   |                 | Mitigation                                      | Supervision          |  |  |
| Physical receptor | Impact on soil | <ul style="list-style-type: none"> <li>- Decrease erosion by minimizing disturbances and scarification of the surface</li> <li>- Best practices for soil management should be followed</li> <li>- Good housekeeping to minimize spills/leaks</li> <li>- Proper handling and management of wastes</li> </ul>   | Minor           | Contractor                                      | LDC – HSE department | Field supervision (audits)                       | <ul style="list-style-type: none"> <li>- Contractor costs</li> <li>- LDC management costs</li> </ul> |
|                   | Air emission   | <ul style="list-style-type: none"> <li>- Monitoring of wind speed and direction to manage dust-generating activities during undesirable conditions.</li> <li>- Management of number of vehicles and equipment in the site.</li> <li>- Appropriate maintenance, engine tuning and servicing of construction equipment to minimize exhaust emissions</li> <li>- Minimize unnecessary journeys or equipment use</li> <li>- Adopt a policy of switching off machinery and equipment when not in use (idle mode).</li> <li>- Minimizing drop heights for material transfer activities such as unloading of friable materials.</li> <li>- Transportation of construction waste by a licensed contractor.</li> <li>- Sheeting of Lorries transporting friable construction materials.</li> <li>- Appropriate sitting and covering of stockpiles of friable materials with adequate cover in addition to regular water spraying so as to minimize dust blow.</li> </ul> | Minor           | Contractor                                      | LDC – HSE department | Contractual clauses + Field supervision (audits) | <ul style="list-style-type: none"> <li>- Contractor costs</li> <li>- LDC management costs</li> </ul> |



|                   |                  |  |       |  |                               |   |  |
|-------------------|------------------|--|-------|--|-------------------------------|---|--|
|                   | Noise            | <p><b>Worker</b></p> <ul style="list-style-type: none"> <li>- Application of the normal precautions normally taken by construction workers.</li> </ul> <p><b>Nearby farmers</b></p> <ul style="list-style-type: none"> <li>- Notification to the surrounding establishment prior to the construction phase.</li> <li>- Time management and construction schedule according to the WBG regulation provided by the contractor prior to the construction phase</li> </ul>   | Minor | LDC<br>Excavation<br>Contractor  | LDC–<br>HSE<br>departmen<br>t | Contractual clauses<br>+ Field supervision<br>(audits)<br>Field supervision<br>Complaints receipt<br>from local<br>administration | <ul style="list-style-type: none"> <li>- Contractor costs</li> <li>- LDC management costs</li> </ul>   |
| Physical receptor | waste generation | <ul style="list-style-type: none"> <li>- Temporary storage in areas with impervious floor</li> <li>- Safe handling using PPE and safety precautions</li> <li>- Empty cans of oil-based paint resulting from painting the steel connection pipes of the PRS project are to be collected and sent back to nearest LDC depots (Abo Rawash) for temporary storage until disposal at a hazardous waste facility (Nassreya or UNICO in Alexandria).</li> <li>- If hazardous waste quantities generated are too small for isolated transport to the Nassreya landfill, a temporary storage site can be created. Coordination with waste authority will be imperative to secure a location and implement adequate procedures for storage depending on quantities and type of wastes until collection and shipping to Nassreya landfill.</li> <li>- Hand-over selected oils and lubricants and their containers to Petrotrade Co. for recycling</li> </ul> <p><b><u>Table 7-2 present more details about waste management</u></b></p> | Minor | <ul style="list-style-type: none"> <li>- LDC</li> <li>- Excavation Contractor</li> </ul> | LDC<br>HSE<br>Departmen<br>t  | Field supervision<br>and review of<br>certified waste<br>handling,<br>transportation, and<br>disposal chain of<br>custody         | <ul style="list-style-type: none"> <li>- Indicative cost items included in contractor bid:</li> <li>- Chemical analysis of hazardous waste</li> <li>- Trucks from licensed handler</li> <li>- Pre-treatment (if needed)</li> <li>- Disposal cost at Nassreya</li> <li>- Approximate cost of the above (to be revised upon project execution): 8000 EGP -10000 EGP per ton</li> </ul> |



|  |   |  |       |  |                       |  |  |
|--|---|--|-------|--|-----------------------|--|--|
| <b>Social receptor (health and safety)</b> | Impacts on occupational health and safety | <ul style="list-style-type: none"> <li>- The project management unit will ensure that HS action plans and procedures are integral part of the contractors' contracts, workers are fit to their assigned jobs, appropriately trained on following HS measures, continuous supervision for high risk jobs,...etc. Failure to comply with HS measures from contractors will result in penalties against the contractor, stopping work at the contractor cost and would reach termination of contract in case of repeated severe violations. Special measures to respond to prevent spread of COVID-19 are considered mandatory to all contractors, workers and visitors on site. These measures are currently added as addendum to contractors' contracts.</li> <li>- Standard protection by placing clear project signs.</li> <li>- Time management for vehicles movement; especially avoiding the peak hours</li> <li>- Standard protection for the workers especially working at elevated heights or trench.</li> <li>- Regular inspection to compelling worker to used their PPE</li> <li>- Training and licensing industrial vehicle operators of specialized vehicles.</li> <li>- The contractor also should keep attendance worksheet and Laborers ID in order to verify the age of workers</li> <li>- Health insurance should be applicable to the contractor workers and workers contracted by a sub-contractor</li> <li>- Full compliance to EGAS and LDC HSE requirements, manuals, and actions as per detailed manuals adopted by EGAS</li> <li>- The safety work Permits in general will be issued before each activity on site by the LDC safety team according to the EGAS HSE guidelines (<a href="#">Annex-4</a>)</li> <li>- Ensure the provision of the appropriate personal protective Equipment and other equipment needed to ensure compliance to HSE manuals</li> </ul> | Minor | <ul style="list-style-type: none"> <li>- LDC</li> <li>- Excavation Contractor</li> </ul> | LDC<br>HSE Department | Field supervision and review of HSE report+ Field supervision (audits) | <ul style="list-style-type: none"> <li>- Contractor costs</li> <li>- LDC management costs</li> </ul> |
|  |   |  |       |  |                       |  |  |



|                                  |  |       |       |  |  |  |
|----------------------------------|--|-------|-------|--|--|--|
| Impacts due to COVID-19 pandemic | <p><b>Assessing Workforce Characteristics</b></p> <ul style="list-style-type: none"> <li>- minimize contact and keep a distance not less than 1 meter with community people</li> </ul> <p><b>Entry/Exit to the Work Site and Checks on Commencement of Work</b></p> <ul style="list-style-type: none"> <li>- Confirm that workers are fit for work</li> <li>- Check and record temperatures of workers</li> <li>- Update daily personnel count log(in/out) in each area/ working site</li> <li>- Provide briefings to workers prior to commencing work, focusing on COVID-19 specific considerations, and reminding workers to self-monitor for possible symptoms and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell</li> <li>- Prevent a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or isolating such worker for 14 days.</li> <li>- Prevent sick workers from entering the site, referring them to local health</li> </ul> <p><b>General Hygiene</b></p> <ul style="list-style-type: none"> <li>- Train workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular hand washing and social distancing) and what to do if they or other people have symptoms</li> <li>- Place informative, illustrative posters and signs around the site,</li> <li>- Ensure hand washing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout the site, if such facilities aren't available then Alcohol based sanitizers should be supplied</li> </ul> <p><b>Cleaning and Waste Disposal</b></p> <ul style="list-style-type: none"> <li>- Provide adequate cleaning equipment, materials, and appropriate PPE ( face masks, gloves,...) as necessary</li> <li>- Train on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas</li> </ul> | Minor | - LDC | - LDC<br>Patrolling<br>committees<br>EGAS<br>HSE<br>department | Field supervision and review of HSE report+ Field supervision (audits) | - Contractor costs<br>- LDC management costs |
|                                  |  |       |       |  |  |  |





|             |  |                    |                                    |                                 |  |   |
|-------------|--|--------------------|------------------------------------|---------------------------------|--|---|
|             | <ul style="list-style-type: none"> <li>- Train on proper hygiene, how to use PPE and waste control</li> </ul> <p><b>Adjusting Work Practices</b></p> <ul style="list-style-type: none"> <li>- Adapting work processes to enable social distancing and training workers on these processes</li> <li>- Continuing with usual safety trainings include use of PPE, adding COVID-19 specific considerations</li> <li>- Review overall work schedule and assess whether adjustments are needed, considering Government advice and instructions</li> </ul> <p><b>Project Medical Services</b></p> <p><b>Local Medical and Other Services</b></p> <ul style="list-style-type: none"> <li>- Any suspected case should leave site immediately and referred to the nearest hospital / local medical facility for medical examination</li> <li>- any suspected cases should self-quarantine for 14 days</li> </ul> <p><b>Instances or Spread of the Virus</b></p> <ul style="list-style-type: none"> <li>- If a worker has symptoms of COVID-19, the worker should be removed immediately from work activities</li> <li>- The worker should be referred to the local health facilities to be tested.</li> <li>- Implement sanitization practices in affected sites</li> <li>- Inform fellow workers of possible exposure to the virus if a worker is confirmed to have Covid-19 infection but maintain confidentiality</li> </ul> <p><b>Training and Communication with Workers</b></p> <ul style="list-style-type: none"> <li>- Workers are made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them</li> <li>- Training are conducted regularly, providing workers with a clear understanding of how they are expected to behave and carry out their work duties</li> <li>- <b>in addition to EMOP and WBG Guidelines related to COVID-19 infection (Annex-9).</b></li> </ul> |                    |                                    |                                 |  |   |
| Child Labor | <ul style="list-style-type: none"> <li>- The project will hire a qualified contractor/sub-contractor with the high health and safety standards. In addition, the ToR for the contractor and the ESIA will provide the provision of the health, safety and precaution of the environmental impacts and its mitigation</li> </ul>  | Minor - Negligible | - LDC<br>- Excavation<br>Contracto | - LDC–<br>HSE<br>departm<br>ent | - Field supervision<br>and review of<br>HSE report+<br>Field supervision | - Contractor costs<br>- LDC management<br>costs |



|       |  |   |       |                                |                                  |   |  |
|-------|--|---|-------|--------------------------------|----------------------------------|---|--|
|       |  | <p>measures to be followed during construction.</p> <ul style="list-style-type: none"> <li>- Rigid obligations and penalties will be added to the contractor ToR in order to warrantee no child Labor is occurred in the project</li> <li>- The ToR also will oblige the contractor to keep a copy of IDs of Laborers in order to monitor the hired staff below 18 years old</li> <li>- The contractor also will be obliged to maintain daily attendance sheets in order to verify the attendance of workers to ensure first, that workers below 18 years old are not included on site, second, in case of accidents the injured persons will be provided with proper health insurance</li> </ul>   |       | r/subcontractor                |                                  | (audits)  |  |
|       | Disturbance to Community due to Labor Influx | <p>In order to minimize impacts pertaining to labor influx the following should be thoroughly implemented:</p> <ul style="list-style-type: none"> <li>- Preparation of appropriate code of conduct that stipulates the different commitment of labor towards community groups and the different behavior that should be avoided (please see <a href="#">Annex-10</a> of this report)</li> <li>- All workers should be trained on the Code of Conduct)</li> <li>- Code of conduct to be signed by contractor and subcontractor workers.</li> <li>- All workers should sign their attendance of the code of conduct training.</li> <li>- Code of conduct induction to be done every 2 weeks for the recurrent workers and the new comers before starting work.</li> <li>- According to availability, try to rent all apartments in the same building.</li> <li>- Apply the full requirements related to operating the grievance mechanism including anonymous channels</li> <li>- Raising awareness of the local populations about the project commitment towards communities' and the measures taken for that through public consultation and focus group discussions</li> <li>- Apply Penalties to workers violating the code of conduct</li> </ul> | Minor | Contractors and subcontractors | LDC HSE for guidance supervision | Field supervision by LDC and EGAS<br>- Received grievances  | - Contractor costs<br>- LDC management costs |
| Commu | Traffic                                      | <ul style="list-style-type: none"> <li>- Time management for transporting the materials, equipment, debris, etc.</li> <li>- Clear sign surrounding construction site and the exit gate.</li> <li>- Coordination with traffic department (ministry of interior) for vehicles route and movement.</li> <li>- Vehicle speed restrictions should be applied across the project site,</li> </ul>   | Minor | Contractors                    | LDC + Traffic department         | Contractor has valid conditional permit + Field supervision | - Contractor costs<br>- LDC management costs |



|                                 |  |   |            |                    |                      |   |  |
|---------------------------------|--|---|------------|--------------------|----------------------|---|--|
|                                 |  | <ul style="list-style-type: none"> <li>- Flag man will be considered whenever needed.</li> <li>- Safety precautions taken during night driving will be according to EGAS HSE guidelines (<b>Annex-4</b>)</li> </ul>   |            |                    |                      |   |  |
| Land related impact             |  | <ul style="list-style-type: none"> <li>- Land was obtained in full compliance with willing buyer willing seller approach.</li> <li>- No tenants, encroachers, residential laborers or other with customary claims or other of land use.</li> <li>- Enable grievance mechanism and disclose it to community</li> </ul>   | Negligible | LDC HSE department | EGAS SDO             | Field Supervision                       | <ul style="list-style-type: none"> <li>- LDC</li> <li>- EGAS management costs</li> </ul>             |
| Concerns of Community mechanism |  | The detailed grievance mechanism (GRM) is presented in <b>Annex-11</b> attached to this report is to be shared with the community beneficiaries. Posters will be prepared and made available to the beneficiaries in the contracting office <sup>7</sup> . Additionally, they will be availed in the customer services office. Thus, sufficient and appropriate information about the GRM will be disseminated to the communities prior to the construction phase. Information dissemination about the GRM should be shared with the beneficiaries during the process of contracting and disclosed in the contracting office and other publicly accessible venues | Negligible | Contractors        | LDC – HSE department | Contractual clauses + Field supervision | <ul style="list-style-type: none"> <li>- Contractor costs</li> <li>- LDC management costs</li> </ul> |

Table 7-2: Waste management During Construction Phase

| Waste Type  | Hazardous/ Non-Hazardous | Treatment and Disposal   |
|---|--------------------------|--|
| Cement and Concrete Wastes (Including Cement Contaminated Soil) | Non-Hazardous            | - will be transferred by local units Trucks to Qaha intermediate waste handling area then to be transferred by larger trucks to the main Abu Zaabal dumpsite |
| Domestic Waste (food waste, packing,)                           |                          |  |
| Wood – Scrap  | Non-Hazardous            | - Temporarily stored in isolated area on-site, then transported to Abu Rawash storage site (Egypt Gas facility) to be sold as scrap.                         |
| Tires   |                          |  |
| Cardboards  |                          |  |

<sup>7</sup> Falls under the budget of the LDCs



|  |           |   |
|--|-----------|---|
| Containers                                     |           |   |
| Paints containers                              | Hazardous | - Temporarily stored in isolated area on-site, then transported to Abu Rawash storage site. final Disposal will be UNICO.   |
| Batteries                                      |           |   |
| Chemicals (solvent, lubricants,...) containers | Hazardous | - Temporarily stored in isolated area of the site, the transported- by licensed hazardous waste handling vehicles and personnel- to Abu Rawash storage site (Egypt Gas facility) for final disposal at Nassreya hazardous waste facility. |
| Used Oils                                      | Hazardous | - Temporarily stored in isolated area on-site, then transported to Abu Rawash storage site. Final disposal will be by Petrotrade Co.  |



Table 7-3: Environmental and Social Management Matrix during Operation

| Receptor       | Impact                         | Mitigation measures   | Residual impact | Institutional Responsibility for Implementation  |   | Means of Supervision  | Estimated Cost of mitigation / supervision   |
|----------------|--------------------------------|---|-----------------|--|---|---|--|
|                |                                |   |                 | Mitigation   | Supervision   |   |  |
| Social –Health | Occupational health and safety | <ul style="list-style-type: none"> <li>- ESMP will provide the provision of the health, safety and precaution of the environmental impacts and its mitigation measures to be followed during operation.</li> <li>- Comply with all the Egyptian laws concerning social insurance and hiring staff.</li> <li>- Remote actuation of isolation and slam-shut valves by LDC for PRS and pipelines</li> <li>- Produce Hazardous Area Classification drawings</li> <li>- Control room exit design.</li> <li>- Preventive maintenance policy and station manual</li> <li>- Provision of self-contained breathing apparatus (2 pieces for each station) for handling odorant leaks</li> <li>- Apply jet fire rated passive fire protection system to all critical safety shutdown valves ESDVs or Solenoid valves (As applicable)</li> <li>- Place signs in Arabic and English "Do Not Dig" and "High Pressure Pipeline Underneath"</li> <li>- Install an elevated wind sock and provision of portable gas detectors</li> <li>- The design should fully comply with IGE TD/3 code requirements</li> </ul> | Minor           | <ul style="list-style-type: none"> <li>- LDC Project and Admin. Departments</li> <li>- Designer</li> </ul> | <ul style="list-style-type: none"> <li>- LDC project department</li> <li>- Engineering dep.</li> <li>- HSE dept.</li> <li>- EGAS</li> </ul> | <ul style="list-style-type: none"> <li>- Drawing and design Document Review</li> <li>- Policy and manual review</li> <li>- Inspection by operators</li> <li>- Signage inspection and site visits</li> </ul> | <ul style="list-style-type: none"> <li>- Project cost</li> <li>- LDC management costs</li> </ul> |



|  |  |  |  |  |  |  |  |
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|                                  |   |            |       |   |  |  |
|----------------------------------|---|------------|-------|---|--|--|
| Impacts due to COVID-19 pandemic | <p><b>Assessing Workforce Characteristics</b></p> <ul style="list-style-type: none"> <li>- minimize contact and keep a distance not less than 1 meter with community people</li> </ul> <p><b>Entry/Exit to the Work Site and Checks on Commencement of Work</b></p> <ul style="list-style-type: none"> <li>- Confirm that workers are fit for work</li> <li>- Check and record temperatures of workers</li> <li>- Update daily personnel count log(in/out) in each area/ working site</li> <li>- Provide briefings to workers prior to commencing work, focusing on COVID-19 specific considerations, and reminding workers to self-monitor for possible symptoms and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell</li> <li>- Prevent a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or isolating such worker for 14 days.</li> <li>- Prevent sick workers from entering the site, referring them to local health</li> </ul> <p><b>General Hygiene</b></p> <ul style="list-style-type: none"> <li>- Train workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular hand washing and social distancing) and what to do if they or other people have symptoms</li> <li>- Place informative, illustrative posters and signs around the site,</li> <li>- Ensure hand washing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout the site, if such facilities aren't available then Alcohol based sanitizers should be supplied</li> </ul> <p><b>Cleaning and Waste Disposal</b></p> <ul style="list-style-type: none"> <li>- Provide adequate cleaning equipment, materials, and appropriate PPE ( face masks, gloves,...) as necessary</li> <li>- Train on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas</li> <li>- Train on proper hygiene, how to use PPE and waste control</li> </ul> | Negligible | - LDC | - LDC<br>Patrolling committees<br>- EGAS HSE department | - Field supervision and review of HSE report+ Field supervision (audits) | - Contractor costs<br>- LDC management costs |
|                                  |   |            |       |   |  |  |



|                                 |                         |  |              |                    |                       |                              |  |
|---------------------------------|-------------------------|--|--------------|--------------------|-----------------------|------------------------------|--|
|                                 |                         | <p><b>Adjusting Work Practices</b></p> <ul style="list-style-type: none"> <li>- Adapting work processes to enable social distancing and training workers on these processes</li> <li>- Continuing with usual safety trainings include use of PPE, adding COVID-19 specific considerations</li> </ul> <p><b>Project Medical Services</b></p> <p><b>Local Medical and Other Services</b></p> <ul style="list-style-type: none"> <li>- Any suspected case should leave site immediately and referred to the nearest hospital / local medical facility for medical examination</li> <li>- any suspected cases should self-quarantine for 14 days</li> </ul> <p><b>Instances or Spread of the Virus</b></p> <ul style="list-style-type: none"> <li>- If a worker has symptoms of COVID-19, the worker should be removed immediately from work activities</li> <li>- The worker should be referred to the local health facilities to be tested.</li> <li>- Implement sanitization practices in affected sites</li> <li>- Inform fellow workers of possible exposure to the virus if a worker is confirmed to have Covid-19 infection but maintain confidentiality</li> </ul> <p><b>Training and Communication with Workers</b></p> <ul style="list-style-type: none"> <li>- Workers are made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them</li> <li>- Training are conducted regularly, providing workers with a clear understanding of how they are expected to behave and carry out their work duties</li> <li>- <b>in addition to EMOP and WBG Guidelines related to COVID-19 infection (Annex-9).</b></li> </ul> |              |                    |                       |                              |  |
| <p><b>Physical receptor</b></p> | <p>waste generation</p> | <ul style="list-style-type: none"> <li>- Strict use of chemical-resistant suits and PPE when handling odorant barrels, tanks, or spills</li> <li>- Evacuation of odorant from barrels into holding tank with utmost care and full PPE</li> <li>- Covering possible odorant spills immediately with sand and treatment with sodium hypochlorite as per EGAS and LDC practices</li> <li>- On-site treatment of empty containers with sodium hypochlorite and detergent as Per EGAS and LDC practice</li> <li>- Ship empty containers to a certified hazardous waste facility via</li> </ul>  | <p>Minor</p> | <p>- PRS staff</p> | <p>- LDC HSE Dpt.</p> | <p>- Quaternary auditing</p> | <ul style="list-style-type: none"> <li>- Project cost</li> <li>- LDC management costs</li> </ul> |





|  |   |  |  |  |  |  |
|--|---|--|--|--|--|--|
|  | <p>company depot using certified handling and transportation contractors</p> <ul style="list-style-type: none"> <li>- Ensure full and empty (treated) odorant containers are accompanied by a trained HSE specialist during transportation to and from the depot and to/from the hazardous waste disposal facility (UNICO and/or Nassreya)</li> </ul> <p>In order to minimize risk of spillage of hazardous odorant, the following general precautions should be taken:</p> <ul style="list-style-type: none"> <li>- Pre-Plan the anticipated amounts of odorants to be used in order to minimize leftovers and residuals.</li> <li>- Handle with extreme care and always perform visual checks on the integrity of the odorant container</li> <li>- Avoid rough handling rolling or dropping of odorant containers</li> <li>- Avoid exposure to direct sunlight during storage or transportation</li> <li>- Ensure odorant containers are always sealed properly and secured from tipping/falling/damage during transportation and storage (temporary and long-term)</li> <li>- Always have sufficient amounts of sand, sodium hypochlorite and detergent on standby during usage of odorant</li> <li>- ALWAYS handle containers or spills with care and full PPE compliance</li> <li>- Never release or empty residual odorant from its container to any receptor or for any reason other than filling the odorant tank at the PRS</li> <li>- NEVER use empty odorant containers for any other purpose</li> </ul> <p>In case of odorant spillage:</p> <ul style="list-style-type: none"> <li>- avoid inhalation and sources of ignition</li> <li>- immediately cover and mix with sufficient amounts of sand and sodium hypochlorite using necessary PPE and tools</li> <li>- collect contaminated sand in clearly marked secure containers/bags</li> <li>- Add sand to inventory of hazardous waste</li> </ul> |  |  |  |  |  |
|--|---|--|--|--|--|--|



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## 7.3 Monitoring and Review

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Procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements will be established. In addition to recording information to track performance and establishing relevant operational controls, dynamic mechanisms, such as internal inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes will be utilized.

Monitoring will normally include recording information to track performance and comparing this against requirements in the management program. The monitoring results shall be documented and the necessary corrective and preventive actions in the amended management program and plans shall be identified consequently.

### 7.3.1 Monitoring procedures

In order to fulfil the monitoring requirements and to ensure that any non-compliances are corrected, the following tasks should be followed:

- LDC HSE staff is responsible to carry out periodic audits to follow up on ESMP implementation.
- Any observed non-compliance is recorded and corrective actions requested.
- LDC report these non-compliances and the corrective actions taken to EGAS in their monthly reports.

EGAS also conduct supervisory visits to ensure that all mitigation measures are appropriately adhered to, non-compliances are reported to the LDC and an action plan to correct the situation is requested and followed within the LDC monthly reports to EGAS



Table 7-4: Environmental and Social Monitoring Matrix during CONSTRUCTION

| Receptor                                       | Impact                           | Monitoring indicators  | Responsibility of monitoring | Frequency of monitoring   | Location of monitoring                     | Methods of monitoring  | Estimated Cost of monitoring |
|--|----------------------------------|--|------------------------------|---|--|--|------------------------------|
| Ambient air quality                            | Increased air emissions and dust | - Inspection of vehicle and machinery maintenance schedule<br>- Inspection of the construction activities<br>- Exhaust emissions concentrations from diesel generators | LDC HSE                      | Monthly during construction + before construction and each three month for machines | Vehicles licensing Department              | Measurements and reporting of exhaust emissions of construction activities machinery<br>Complaints log | LDC management costs         |
|  |                                  | - Noise intensity, exposure durations and noise impacts<br>- Use of earmuffs by Construction workers   | LDC HSE                      | Regularly during site inspections   | Construction site                          | Measurements of noise levels<br>Complaints log   | LDC management costs         |
| Ambient noise levels                           | Increased noise levels           | Complaints from Farmers  | LDC HSE                      | Weekly during construction.   | Construction site                          | Documentation in HSE monthly reports   | LDC management costs         |
|  |                                  | Observation of accumulated waste piles   | LDC HSE                      | During construction.<br>Monthly reports   | Construction site                          | Observation and documentation  | LDC management costs         |
| Physical receptor (soil, Ground water, visual) | Waste generation                 | Observation of water accumulations resulting from dewatering (if encountered)  | LDC HSE                      | During construction.<br>Weekly reports  | Around construction site                   | Observation and documentation  | LDC management costs         |
|  |                                  | Chain-of-custody and implementation of waste management plans  | LDC HSE                      | Area reports  | Construction site and document examination | Site inspection and document inspection  | LDC management costs         |



| Receptor                | Impact                         | Monitoring indicators   | Responsibility of monitoring | Frequency of monitoring              | Location of monitoring | Methods of monitoring  | Estimated Cost of monitoring |
|-------------------------|--------------------------------|---|------------------------------|--------------------------------------|------------------------|--|------------------------------|
| <b>Labor conditions</b> |                                | Chain-of-custody and implementation of domestic wastewater (sewage) management  | LDC HSE                      | During construction. Monthly reports | Construction site      | Site inspection and document inspection  | LDC management costs         |
|                         | Occupational Health and safety | Make sure that health insurance are applicable.<br><br>Total number of complaints raised by workers<br>Periodic Health report<br>Periodic safety inspection report<br>Incident register | LDC HSE                      | Two times per year for the PRS       | Construction site      | Safety supervisor should follow commitment of workers to use the protective equipment<br>-Inspection & recording of the performance<br>-Reports about the workers and complaints | LDC management costs         |
|                         |                                | Provide a suitable tool for wind direction (Windsock) to be installed in a suitable place to determine the wind direction.  | LDC HSE and Projects Dpt.    | Daily during construction            | Construction site      | Supervision & reporting  | LDC management costs         |
|                         |                                | Cooperation should be done with the concerned parties before planning for housing projects around the PRS area.   | LDC Projects Dpt.            | Daily during construction            | Construction site      | Supervision & reporting  | LDC management costs         |



| Receptor | Impact   | Monitoring indicators   | Responsibility of monitoring                  | Frequency of monitoring               | Location of monitoring | Methods of monitoring  | Estimated Cost of monitoring |
|----------|--|---|---|---------------------------------------|------------------------|--|------------------------------|
|          | COVID-19 pandemic                                  | - Number of Suspected or confirmed Covid-19 cases, their location, condition, and all related actions taken<br>Periodic Health report   | LDC Covid-19 Patrolling committee<br>EGAS HSE | Daily                                 | Construction site      | As per the instructions of the Ministry of Petroleum (MoP), Patrolling committees have been formed across all LDCs to ensure that mitigation measures are being implemented on all construction sites, these committees report to EGAS on daily basis whereas EGAS report to MoP on weekly basis | LDC management costs         |
|          | Child Labor  | - Attendee's lists with workers IDs are in place.<br>- Complaints and accidents reports.  | LDC HSE                                       | Biannual for PRS                      | Construction site      | Safety supervisor observe the Laborers<br>Random checkup for Laborers IDs  | LDC management costs         |
|          | Disturbance to local community due to labor influx | - Code of conduct is in place<br>- A list of workers who have attended the proper training on code of conduct (with dates).<br>- Complaints raised by the local community GRM.<br>- Conduct spot checks/audits on the worker's behaviors during field visits. | LDC HSE                                       | When reported and during field visits | Construction sites     | Supervision & reporting  | Contractor Cost              |



| Receptor                        | Impact   | Monitoring indicators                              | Responsibility of monitoring | Frequency of monitoring     | Location of monitoring | Methods of monitoring                                  | Estimated Cost of monitoring |
|---------------------------------|--|--|------------------------------|-----------------------------|------------------------|--|------------------------------|
| Local traffic and accessibility | Reduction of traffic flow and accessibility to local community | Comments and notifications from Traffic Department | LDC HSE                      | Weekly during construction. | Construction site      | Documentation in HSE monthly reports<br>Complaints log | LDC management costs         |

Table 7-5: Environmental and Social Monitoring Matrix during Operation

| Receptor                                       | Impact  | Monitoring indicators   | Responsibility of monitoring | Monitoring Frequency                   | Location of monitoring   | Methods of monitoring   | Monitoring Estimated Cost |
|--|---|---|------------------------------|--|--|---|---------------------------|
| Ambient air quality                            | Improper management of odorant during operation | <ul style="list-style-type: none"> <li>- Log of spillage incidents</li> <li>- Number of treated containers</li> <li>- Odorant delivery forms</li> </ul>                         | LDC HSE                      | Quarterly for each PRS                 | - PRSs   | Compare Environmental Register with odorant delivery forms, observation of site | LDC management costs      |
| Ambient noise levels                           | Noise of PRS operation                          | <ul style="list-style-type: none"> <li>- Noise intensity</li> </ul>   | LDC HSE                      | Quarterly for each PRS                 | - PRSs   | - Noise meter   | LDC management costs      |
| Physical receptor (soil, Ground water, visual) | Waste generation                                | <ul style="list-style-type: none"> <li>- Best practice of handling and intermediate storage</li> <li>- Disposal to appropriate and license landfill</li> </ul>                  | LDC HSE                      | Quarterly for each PRS                 | - PRSs   | - Hazardous waste Register  | LDC management costs      |
| Labor conditions                               | Occupational Health and safety                  | <ul style="list-style-type: none"> <li>- Total number of complaints raised by workers</li> <li>- Periodic Health report</li> <li>- Periodic safety inspection report</li> </ul> | LDC, EGAS                    | Four times per year, each three months | <ul style="list-style-type: none"> <li>- Safety supervisor should follow the commitment of workers to use the protective equipment</li> <li>- Inspection and recording of the performance</li> </ul> | Complaints log<br>LDC   | No cost                   |



| Receptor | Impact | Monitoring indicators   | Responsibility of monitoring   | Monitoring Frequency        | Location of monitoring                          | Methods of monitoring                    | Monitoring Estimated Cost |
|----------|--------|---|--|-----------------------------|---|--|---------------------------|
|          |        |   |  |                             | - Reports about the workers & complaints        |  |                           |
|          |        | Preparing an emergency response plan and for the PRS including all scenarios in this study and other needs like:  | LDC HSE (ERP document)   | Yearly (ERP doc.)           | PRS location                                    | HSE annual audit                         | LDC management costs      |
|          |        | Firefighting brigades, mutual aids, emergency communications and fire detection / protection systems.   | LDC HSE (ERP document)<br>LDC HSE and Operation Dpt. for facilities. | Yearly (ERP doc.)<br>Weekly | Area head office / PRS location<br>PRS location | HSE annual audit<br>Inspection checklist | LDC management costs      |
|          |        | Dealing with the external road in case of major fires.  | LDC HSE (ERP document)   | Yearly (ERP doc.)           | PRS location                                    | HSE annual audit                         | LDC management costs      |
|          |        | First aid including dealing with the odorant according to the MSDS for it, with respect of means of water supply for emergency showers, eye washers and cleaning. | LDC HSE (ERP document)<br>LDC HSE and Operation Dpt. for facilities. | Yearly (ERP doc.)<br>Weekly | Area head office / PRS location<br>PRS location | HSE annual audit<br>Inspection checklist | LDC management costs      |
|          |        | Safe exits in building according to the modeling in this study, and to the PRS from other side beside the designed exit in layout provided.                       | LDC HSE (ERP document)<br>LDC HSE and Operation Dpt.                 | Yearly (ERP doc.)<br>Daily  | Area head office / PRS location<br>PRS location | HSE annual audit<br>Inspection checklist | LDC management costs      |
|          |        | Provide the site with SCBA "Self-Contained Breathing Apparatus" (at least two sets) & arrange training programs for operators.                                    | LDC HSE and Operation Dpt.   | Daily                       | PRS location                                    | Inspection checklist                     | LDC management costs      |



| Receptor | Impact            | Monitoring indicators   | Responsibility of monitoring                  | Monitoring Frequency                                 | Location of monitoring                          | Methods of monitoring  | Monitoring Estimated Cost |
|----------|-------------------|---|---|--|---|--|---------------------------|
|          |                   | All operation is according to standard operating procedure for the PRS operations & training programs in-place for operators.         | LDC Operation Dpt.                            | Daily for operation<br><br>Yearly for training       | Area head office / PRS location                 | HSE annual audit   | LDC management costs      |
|          |                   | Inspection & maintenance plans & programs are according to manufacturers guidelines to keep all facility parts in a good condition.   | LDC Operation and maintenance Dpt.            | Periodic maintenance plan according to manufacturers | Area head office / PRS location                 | HSE annual audit   | LDC management costs      |
|          |                   | Emergency shutdown detailed procedure including emergency gas isolation points at the PRMS & valves room in place.                    | LDC Operation Dpt.                            | Yearly (ERP doc.)                                    | Area head office / PRS location<br>PRS location | HSE annual audit   | LDC management costs      |
|          |                   | Cooperation should be done with the concerned parties before planning for housing projects around PRS area.                           | LDC Security Dpt.                             | Daily  | Around PRS location                             | Patrolling and recorded in logbook   | LDC management costs      |
|          | COVID-19 pandemic | - Number of Suspected or confirmed Covid-19 cases, their location, condition, and all related actions taken<br>Periodic Health report | LDC Covid-19 Patrolling committee<br>EGAS HSE | Daily  | Construction site                               | As per the instructions of the Ministry of Petroleum (MoP), Patrolling committees have been formed across all LDCs to ensure that mitigation measures are being implemented on all construction sites, these committees report to EGAS on daily basis whereas EGAS report to MoP on weekly basis | LDC management costs      |





## 7.4 Qaha Quantitative Risk Assessment Study Recommendations

Regarding to the modeling scenarios and risk calculations to workers / public which found in Acceptable region (workers and public), therefore there are some points need to be considered to maintain the risk tolerability in its region and this will be describe in the following recommendations:

| Recommendation   | Timeline Phases  |
|--|--|
| <ul style="list-style-type: none"> <li>Ensure that: <ul style="list-style-type: none"> <li>All PRMS facilities specifications referred to the national and international codes and standards.</li> <li>Inspection and maintenance plans and programs are according to the manufacturers guidelines to keep all facility parts in a good condition.</li> <li>All operations are according to standard operating procedures for the PRMS operations and training programs in-place for operators.</li> <li>Emergency shutdown detailed procedure including emergency gas isolation points at the PRMS and Off-Take Point in place.</li> <li>Surface drainage system is suitable for containment any odorant spillage.</li> </ul> </li> </ul>       | <br>Design<br><br>Operation<br><br>Operation<br><br>Operation<br><br>Design    |
| <ul style="list-style-type: none"> <li>Considering that all electrical equipment, facilities and connections are according to the hazardous area classification for natural gas facilities.</li> </ul>   | Design   |
| <ul style="list-style-type: none"> <li>Preparing an emergency response plan and for the PRS including all scenarios in this study and other needs like: (Not Provided by EG) <ul style="list-style-type: none"> <li>Firefighting brigades, mutual aids, emergency communications and fire detection / protection systems.</li> <li>Dealing with the external road in case of major fires.</li> <li>First aid including dealing with the odorant according to the MSDS for it, with respect of means of water supply for emergency showers, eye washers and cleaning.</li> <li>Safe exits in building according to the modeling in this study, and to the PRS from other side beside the designed exit in layout provided.</li> </ul> </li> </ul> | <br>Operation<br><br>Operation<br><br>Operation<br><br>Operation<br><br>Design |
| <ul style="list-style-type: none"> <li>Provide the site with SCBA “Self-Contained Breathing Apparatus (at least two sets) and arrange training programs for operators.</li> </ul>  | Operation  |
| <ul style="list-style-type: none"> <li>Provide a suitable tool for wind direction (Windsock) to be installed in a suitable place to determine the wind direction <b>(the PRMS lay-out need to be reviewed for correction of the North direction)</b></li> </ul>  | Construction   |
| <ul style="list-style-type: none"> <li>Cooperation should be done with the concerned parties before planning for housing projects around the PRMS area.</li> </ul>   | Operation / Design<br>/ Construction   |



## 7.5 Reporting of Mitigation and Monitoring Activities

During construction and operation, environmental performance against targets is reviewed by management on a monthly basis and reported to the contractor and LDC. The plan is designed to record incidents and to ensure investigation, root cause analysis, corrective action and follow up. Records are kept of all incidents, investigations and actions.

Regulatory and HSE reporting systems will be brought together on a monthly basis to be collated and input into the LDC's (Egypt Gas) reporting system to be submitted to EGAS' Environment Department during the construction phase.

During operation, the reporting of any occurrence and /or the result will take the following path:

- recording of the nature and scale of the occurrence;
- reporting to the necessary competent/ responsible persons; and
- Internal reporting and external regulatory notification.

### 7.5.1 During the Construction phase reports should include as a minimum

- Monthly report for the implementation of the ESMMP submitted by the contractor to LDC HSE staff.
- Monthly report on incident and complaint from the surrounding establishments and residents nearby the construction site.
- Unusual traffic delays or accident caused during construction or any complaints received should be reported in the monthly report prepared by the construction contractor supervisor. And /or permits and any comments or recommendations by Traffic Department
- Monthly report should include any incidents of high dust emissions or smoke during construction works including the natural dust that might be encountered.
- There should be a form prepared by LDC's HSE department for the contractor to keep records of quantities, types of wastes received and the location where it has been received from.
- The monthly report of HSE supervisor from LDC should an evaluation of the contractor's compliance to mitigation measures and any comments noticed by the HSE site supervisor about mismanagement of construction waste during the month.
- The HSE team from LDC observer should report on the monthly basis of the accident or the worker's obedience.
- Reporting on the monthly basis, the total number and the type of heavy equipment use during the construction phase.
- Monthly report on health and safety performance. This report will include any incident and complaint regarding health and safety measures perform by the contractor.
- Daily report to be prepared on construction work of the pressure reduction station.
- Daily report in a logbook to consider any outside construction works around the PRS location that related to public or industrial buildings.



### 7.5.2 Reporting of severe incidents

- In case of worker/community work-related severe accidents or fatalities, immediate reporting should take place by the LDC to the relevant regulatory authorities and to the Project Management at EGAS.
- EGAS will report the major accident to the World Bank within 24 hours at the latest.
- The report will be including all actions taken by LDC to investigate the root cause of the accident and the plan to prevent the occurrence of future accidents will be included in the final investigation report

### 7.5.3 During the operation phase reports should include as a minimum

According to law 4/94 amended by law 9/2009 and its executive regulation, each facility should prepare an environmental register. Components of the environmental register are presented in annex three of the executive regulation. All environmental procedure included in the EMMP are to be recorded in the Environmental Register so that they can be communicated effectively and clearly. It will include (monitoring plan, solid waste management plan, emergency response plan).

Environmental Register shall contain:

- Any complaint related to the noise generated from the PRS
- Regular noise and air measurement reports.
- Record keeping of the admitted waste and their quantity and management (bills of waste transportation).
- Summary of the HSE monthly report.

According to Article 29-32 from law 9/2009 and its executive regulation, the PRS shall prepare a hazardous material and waste register containing the handling and storage of hazardous material and waste in the facility (types, quantities, material safety data sheets, type of storage and means of transportation). Additionally, the register should contain a contract and /or bills of hazardous waste disposal at UNICO and /or Nassreya

Environmental Register shall contain:

- Any complaint related to the noise generated from the PRS
- Regular noise and air measurement reports.
- Record keeping of the admitted waste and their quantity and management (bills of waste transportation).
- Summary of the HSE monthly report.

## 7.6 Emergency Response Plan

Egypt Gas is developing an Emergency Response Plan (ERP) which relates to its operations for the PRS and for its intermediate and low-pressure distribution network. The purpose of this document is to outline emergency responsibilities, organizational arrangements and responses and



procedures to be followed by personnel based in the field in the event of an emergency. For the meanwhile Egypt Gas mainly depend on EGAS's emergency response plan main elements & notification procedures summary, kindly refer to [Annex-12](#) attached to this report.

**Emergency Levels are classified as Levels (Level 1, Level 2 and Level 3) as following:**

**The first level of Emergency:**

- Potential hazards to life, safety, property and the environment are limited, and do not exceed the emergency zone or the boundaries of the public site or facility.
- The personnel of the enterprise or the site possess adequate training, capacity, personal protection equipment and necessary tools to manage and control the situation, and there is no need for external assistance.
- Alarm bells are not required to warn those outside the site or facility.
- The situation does not require evacuation of the emergency zone.
- There is no possibility of losing control or escalating the situation.
- The accident management team is not used.

**The Second level of Emergency:**

- There is a serious risk to life, safety, property and the environment and may exceed the limits of the emergency zone, but do not exceed the limits of the public site or facility.
- There is a need to use the assistance of external parties to manage the emergency, or at least the presence of stand-by team in the presence of a potential escalation of the situation, but the situation does not extend its influence outside the facility or site.
- Members of the facility or site do not have sufficient capacity or resources to deal with the incident
- Requires evacuation and / or warnings to warn those outside the emergency zone
- Security breach or situation leading to constant threat to life and safety
- Accident management team intervenes

**The Third level of Emergency:**

- There is a serious risk to life, safety, property and the environment and may exceed the limits of the emergency zone and the possibility of exceeding the limits of the public site or facility.
- There is a need to use the help of external parties to fight fire, rescue, dealing with hazardous materials, large number of injuries and deaths.
- Measures must be taken to protect units, nearby areas and / or communities and the environment beyond the boundaries of the public site or facility
- There is a potential risk that the reputation of the company, its business or its revenues will be affected



- Any incident involving the exit of the operating system beyond the limits of safe operation with the possibility of escalation
- There is a danger to the public
- There is a possibility to start or run the communication system for emergency reporting
- The accident management team is used.

### 7.6.1 Hotline

A 24-7 Hotline (129) is available for customers and the public to report leaks, damage, emergencies, and/or incidents related to gas connections, components, infrastructure, and activities (inside or outside households) and to request repairs/emergency response/assistance.

## 7.7 Institutional Framework for ESMMP Implementation

### 7.7.1 Environmental Management Structures

EGAS is the supervisory body. Egypt Gas is the implementing body. Below is the management structure of Egypt Gas.

Being the implementing body of the natural gas network in project areas, Egypt Gas has a direct involvement with the environmental management and monitoring of the natural gas network. Egypt Gas has good environmental, occupational health and safety and social background.

One of the standard tasks of the HSE Departments of Egypt Gas, supervised by EGAS, is to ensure that the Environmental and Social Management Plan of the project is implemented in all the phases of the Project.

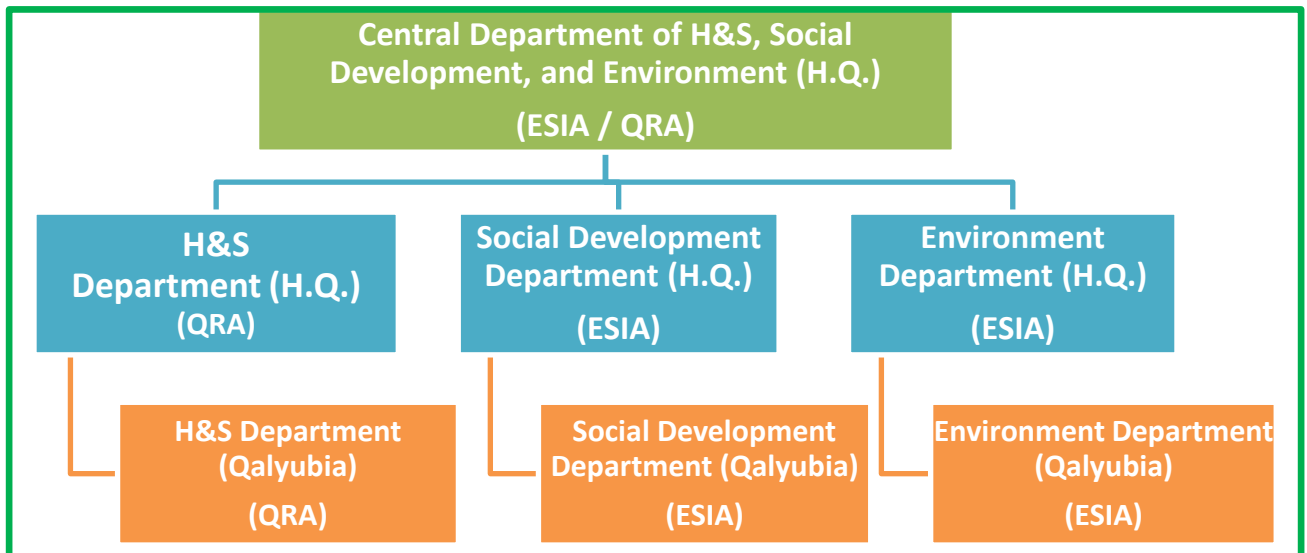


Figure 7-1: Egypt Gas ESMP organogram.

In the structure above, designated site engineers perform daily implementation, monitoring and reporting of activities as per the ESMMP with special attention to:



- Worker and contractor compliance to EGAS HSE manuals and procedures
- Occurrence of HSE incidents and suggestions for incident avoidance (Refer to Item 7.4)
- Management of broken asphalt (if any), unused backfill, solid waste, metal scrap
- Management of paint cans, refueling & lubrication, soil contamination
- Management of liquid waste such as leaked condensate hydrocarbons (if any) or chemicals used in heaters; and
- Checking that handling of hazardous waste is done according to the requirements of the Environmental Law, where a permit for handling hazardous material and Hazardous wastes is issued from EGAS Environment Department
- Using analyzers to measure noise, SO<sub>2</sub>, CO, CH<sub>4</sub> and NO<sub>2</sub> in ambient air, and detect possible natural gas leaks
- Ensure and log compliant handling of odorant/odorant containers, odorant-contaminated-soils (in case of spillage)
- Measure noise at different locations of the PRS
- Other tasks as outlined in ESM & MP

Daily reports are to be compiled and sent to the regional HSE officer for preparation of monthly summary reports.

Monthly reports are sent to HSE officer at Egypt Gas head office for compilation into quarterly reports to EGAS.

### 7.7.1 Required Actions

- 1- Involvement of environmental and social officers during the design, costing, tendering, and construction phases would be advantageous.
- 2- An updated and detailed assessment of Egypt Gas EHS institutional capacity and available resources for implementation of the ESMP
- 3- Specifically, Egypt Gas should take steps to develop capacity of site engineers and HSE officers with specific courses focused on implementation of the ESMP detailed in this ESIA.

### 7.7.2 Management of grievances (E&S Grievance Redress Mechanism)

EGAS and the LDCs aim to be recognized as a responsible operator exemplary in the management of the impacts of its activities. As such, EGAS and the LDCs are committed to preventing, limiting and, if necessary, remedying any adverse impacts caused by its activities on local populations and their social and physical environment.

Identifying, preventing and managing unanticipated impacts are facilitated by a grievance redress mechanism (GRM). As the World Bank's governance and anticorruption (GAC) agenda moves forward, grievance redress mechanisms (GRMs) are likely to play an increasingly prominent role in Bank-supported projects. Well-designed and implemented GRMs can help project management significantly enhance operational efficiency in a variety of ways, including generating public



awareness about the project and its objectives; deterring fraud and corruption; mitigating risk; providing project staff with practical suggestions/feedback that allows them to be more accountable, transparent, and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the project. For task teams more specifically, an effective GRM can help catch problems before they become more serious or widespread, thereby preserving the project's funds and its reputation.

Effective grievance management helps to:

- Build trust through having a dialogue with stakeholders.
- Detect weak signal and propose solution.
- Reduce risk of conflict between the affiliate and local communities.
- Reduce risk of litigation by seeking fair solutions through mediation in the event of an established impact.
- Identify and manage unanticipated impacts of operation.
- Avoid delays to operations and additional costs.
- Avoid future impacts through analysis of weak signals.

The detailed grievance mechanism (GRM) below will be shared with the community beneficiaries. Posters will be prepared and made available to the beneficiaries in the contracting office. Additionally, they will be availed in the customer services office. Thus, sufficient and appropriate information about the GRM will be disseminated to the communities prior to the construction phase. Information dissemination about the GRM should be shared with the beneficiaries during the process of contracting and disclosed in the contracting office and other publicly accessible venues. Following are the various stages of grievances. The proposed mechanism is built on three tiers of grievances:

1. The level of site engineer of Egypt Gas in the project area
2. On the level of LDC headquarter
3. On the level of EGAS

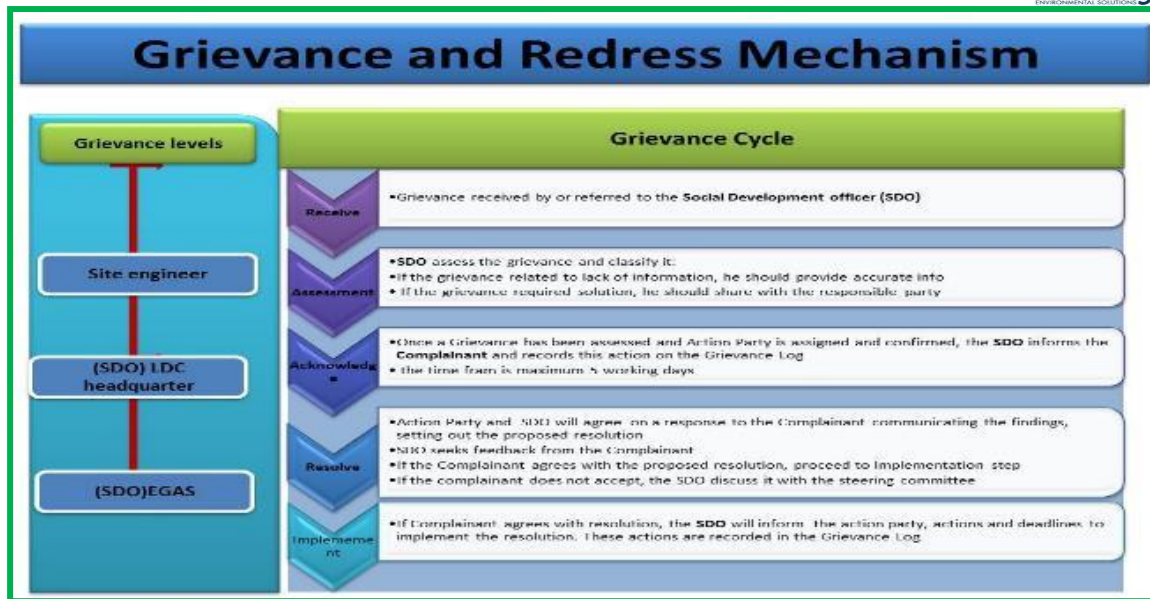


Figure 7-2 Proposed Grievance and Redress Mechanism

### 7.7.2.1 First tier of grievances

In order to ensure high level of responsiveness to the local communities, it is essential to ensure that a local grievance mechanism is functioning and that the communities are aware of it. Egypt Gas has assigned a Social Development Officer (SDO) (can be more than one) who will be working closely with the assigned SDO of EGAS. It is the responsibility of Egypt Gas SDO to ensure that the GRM system is widely known and well explained on the local level. Moreover, s/he will follow up on the complaint until a solution is reached. The turnaround time for the response/resolution should be 15 calendar days and the complainant should know that he/she should receive response by then. (a complain form is attached see [Annex-11](#))

The grievances should be presented to the following:

- The foreman working on the ground in the project area,
- The project manager in the project area
- The regional department of Egypt Gas in Qalyubia Governorate.

It is worth noting that most of the previous experience of EGAS is suggesting that complaints are usually handled efficiently and resolved on the local level. However, the management of the complaints including level of responsiveness, providing feedback and the documentation of the complaints needs to be significantly strengthened. In case the problem is not solved, the complainant may reach out to the second level of grievance

### 7.7.2.2 Second tier of grievances:

If the aggrieved person is not satisfied with the decision of the first tier, they can present the case to Egypt Gas headquarters. Complaint form is attached in [Annex-11](#). SDO where they should provide resolution within 15 calendar days, following is the second level of grievances:





- The Social Development Officer in Egypt Gas headquarters will handle technical, environmental and land acquisition complaints. Egypt Gas headquarters SDO should receive the unsolved problems. Thereafter, the SDO gets in contact with the petitioner for more information and forwards the complaint to the implementing entities for a solution.
- The SDO should follow the complaints and document how they were solved within 15 calendar days.

### **7.7.2.3 Third tier of grievances:**

If the aggrieved person is not satisfied with the decision of the SDOs of Egypt Gas at Stage 2, they can present the case to EGAS SDO where they should provide resolution within 15 calendar days.

The following section presents the third level of grievances:

- The Social Development Officer in EGAS will handle technical, environmental and land acquisition complaints. He/she should receive the unsolved problems. Thereafter, they get in contact with the petitioner for more information and forward the complaint to the implementing entities for a solution.
- The SDO should follow the complaints and document how they were solved within 15 calendar days.
- The SDO should update the complainant on the outcome of his/her complaint.

The aggrieved person has the full right to immediately use tier 2 or 3 upon his convenience and there is no need to exhaust the first tier. Additionally, he can resort to any other governmental entities i.e. Ministry of Petroleum. He/ She also have the full right to bring a lawsuit without resorting to any of the grievance's tiers.

### **7.7.2.4 Grievance channels**

Due to the diversity of the context in different governorates and the socioeconomic characteristics of the beneficiaries, the communication channels to receive grievances are locally tailored to address all petitioners concerns and complaints. The following are the main channels through which grievances will be received:

- Foremen act as the main channel for complaints. They are always available on the construction sites. However, complaints raised to him/her are mostly verbal. Thus, s/he should document all received grievances in writing form using a fixed serial number that the complainant should be informed about to be able to follow up on the complaint.
- Hotline: 129 is the hotline for Egypt Gas.
- Phone numbers of site engineer and SDO.
- The SDO within the LDC and EGAS
- Trustworthy people, community leaders and NGOs/CDAs will be an appropriate channel to guide petitioner about the various tiers of grievances, particularly, in rural areas.



### 7.7.2.5 Response to grievances

Response to grievance will be through the following channels

- The response to grievances should be through an official recognized form to ensure proper delivery to the complainant. It is the responsibility of the SDOs to ensure that complainants were informed about the results of handling their complaints.
- Response to grievances should be handled in timely manner as mentioned above, thereby conveying a genuine interest in and understanding of the worries put forward by the community.
- EGAS and Egypt Gas should maintain record of complaints and results.

**Table 7-6 Means of verification and indicators**

| Monitoring dimensions                             | Means of verification and indicators  |
|---|---|
| GRM is fully operational                          | <ul style="list-style-type: none"> <li>o Number of received grievances monthly (Channel, gender, age, basic economic status of the complainants should be mentioned)</li> <li>o Type of grievance received (according to the topic of the complaint)</li> <li>o Documentation efficiency</li> </ul> |
| Efficiency of responses and corrective procedures | <ul style="list-style-type: none"> <li>o Number of grievances solved and closed</li> <li>o Feedback offered to the grievances</li> <li>o Number of unsolved grievances and the reasons behind not solving them</li> <li>o Time consumed to solve the problem</li> </ul>                             |
| Efficiency of information sharing about GRM       | <ul style="list-style-type: none"> <li>o Dissemination activities undertaken</li> <li>o Total number of brochures distributed (if any)</li> <li>o Total number of awareness meetings conducted (if any)</li> </ul>  |

### 7.7.2.6 Monitoring of grievances

All grievances activities should be monitored in order to verify the process. The monitoring process should be implemented on the level of EGAS and the LDC, (both in the site and in the headquarter).

### 7.7.2.7 Institutional Responsibility for the Grievances

The entity responsible for handling grievances will mainly be the Environmental Affair Department within the implementing agency (EGAS). The Social Development Officer (SDO) working within EGAS in cooperation with the Egypt Gas will address all grievances raised by community members. The main tasks related to grievances of the SDOs on the various levels are:

- Raise awareness about channels and procedures of grievance redress mechanisms
- Collect the grievances received through different communication channels
- Document all received grievances
- Transfer the grievance to the responsible entity
- Follow up on how the problem was addressed and solved



- 
- Document, report and disseminate the outcome of received grievances
  - Ensure that each legitimate complaint and grievance is satisfactorily resolved by the responsible entity
  - Identify specific community leaders, organizations and citizen groups required to enhance the dialogue and communication through a public liaison office to avoid or limit friction and respond effectively to general concerns of the community.
  - Monitoring grievance redress activities.



## 8. Stakeholder Engagement and Public Consultation

The public consultation section aims to highlight the key consultation and community engagement activities that took place as part of the preparation of the ESIA, ESMPs and their outcomes. The new PRS aims to connect NG to Qaha Districts. The new house connections in the project sites are extension to the current existing natural gas connection network in Qalyubia Governorate. ESMPs for other areas were prepared, stakeholder engagement and public consultation activities were held, and studies were cleared by the World Bank and disclosed on both EGAS website and WB info shop. Stakeholder Engagement activities and a series of public consultations were conducted all through the past 6 years since the early stages of the project in December 2013 until recent. The last consultation activities were conducted during May and July, 2018, for two districts in Kafr Shukr and Qaha Districts during the preparation of the ESMP and current study. Stakeholders were identified, a work plan was developed, information adequately disclosed, used different engagement instruments. Fair gender-based participation and engagement of the different stakeholders and documentation of all conducted events were made. Public concerns were responded to and addressed in the ESIAF /ESIA/ESMPs of the project.

Consultation activities showed an overwhelming acceptance of the consulted participants to host the NG and their willingness to be connected to the NG. Some potential beneficiaries expressed their willingness to pay the installation cost in cash, while others were much in favor to pay in installment. This high level of enthusiasm from the local communities towards the project is attributed to the high level of awareness of the benefits of the natural gas and the current hardships that the households are facing to secure LPG provision and usage.

### 8.1 Legal Framework for Consultation

The consultation activities used multiple tools and mechanisms (scoping, interviews, focus group discussions, public hearings/consultations) with various stakeholders and community people in the host communities were held for the proposed 1.5 million household NG connections project in compliance with the following legislations:

- WB policies and directives related to disclosure and public consultation, namely,
  - o Directive and Procedure on Access to Information
  - o World Bank Operational Policy (OP 4.01)
- Egyptian regulations related to the public consultation
  - o Environmental law No 4/1994 modified by Law 9/2009 and 105/2015 and its executive regulation until the last amendment by ministerial decrees no. 1963/2017
- While WB safeguards and regulations state that a minimum of two large-scale, well- publicized



public consultation sessions are a must for projects classified as category “A” projects like the one at hand, additional consultation efforts were implemented to reach the most difficult to reach community members. Additionally, in order to obtain larger scale and more quantifiable information, the consultant should assess conducting surveys in the different sites.

## 8.2 Consultation objectives

The objective of the Stakeholder Engagement is to ensure safe and successful Project delivery by:

- Informing stakeholders, including persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively;
- listening to their comments, ideas and concerns and recording the same for follow up;
- Avoiding conflict by addressing impacts and issues raised by stakeholders promptly; particularly with the communities that will not be served by the project
- Ensuring that fears and anxieties about the nature, scale and impact of the operation have been properly considered in the development and management of the Project
- Accessing and making good use of existing local knowledge of the area;

Communicating and implementing a viable community feedback mechanism. The consultation outcomes will be used in:

- Define potential project stakeholders and suggest their possible project roles
- Identify the most effective outreach channels that support continuous dialogue with the community

Thereafter the results will provide proper documentation of stakeholder feedback and enhance the ESIA accordingly.

## 8.3 Defining the stakeholder

In order to ensure an inclusive and meaningful consultation process, a stakeholder’s analysis was conducted to get better understanding of the various groups and their roles, interests and influence on the project.

For the purpose of this site specific ESIA, a focused stakeholders’ identification was conducted to identify the key groups of relevance to the project in this specific location. The main identified groups are very similar to those identified on the governorate level but on a smaller scale, (elaborated details on that are include in the Governorate level ESMP). In the meantime, local communities of both men and women of projects beneficiaries, local NGOs/CDA were among the key stakeholders on the local level.

The following table shows the key stakeholders that were engaged during the consultation process:



Table 8-1: A list of key stakeholders of both men and women within the project areas

| Stakeholder   | Role/ concern  |
|---|--|
| <b>Local Governmental entities</b>                                      |  |
| Governorates  | The main role of the governorates is the provision of support to the project through mobilizing people to gain information about the project.  |
| Local Governmental units (District authorities and village authorities) | Permissions for PRS construction should be prepared by the governorate and approved by the LGU.  |
| <b>Other governmental entities</b>                                      |  |
| Information Centers on the governorate level                            | Provide NG companies with underground utilities and infrastructure maps.   |
| Governmental Authorities  | Various authorities in the governorate will support the project through permissions for excavation works, maintenance, health related issues, etc.   |
| Egyptian Environmental Affair Agency (HQ and RBOs)                      | Responsible for reviewing and approving ESIA's, and monitoring implementation of the Environmental Management Plan   |
| Security Department   | Secure the construction sites and prevent people from in- flushing into it   |
| Ministry of Health  | Providing health facilities to the project workers   |
| Ministry of Antiquities   | Very important to issue permissions for excavations and accompany the working teams,   |
| Ministry of Transportation  | This Ministry may have interest in issues relating to transportation and traffic planning related to the Project.  |
| <b>Media</b>  |  |
| Television and radio representatives, Press people and Websites editors | Inform the community about the project and its impacts and support dissemination of ESIA studies   |
| <b>NGOs working on environmental and social related aspects</b>         |  |
| NGOs on the central level   | Play an active role in any awareness-raising related to the project  |
| <b>Universities and Educational institutes</b>                          |  |
| Faculty of Engineering  | Review and enrich the ESIA study with feedback   |
| Secondary vocational schools  | Propose needed capacity building for their students to potentially find employment with the project  |
| Researchers/consultants   | Review results of the study and provide feedback   |
| <b>Other</b>  |  |
| Private companies   | Mainly potential tenderers for construction works  |
| Traders   | Provide workers with food and amenities.   |
| Contractors   | From the project adjacent areas, may be affected.  |
| <b>Community people</b>   |  |
| Community leaders   | Main cornerstone in mobilizing the communities.  |
| Potential beneficiaries   | Potentially benefit from the project   |
| Potential Project Affected Persons (PAPs)                               | Farmers whose lands may be traversed by project components.<br>LPG distributors (formal and informal), LPG storage workers.  |
| Vulnerable groups within the local communities                          | Vulnerable groups may be likely to be adversely affected by environmental and social impacts, while also being least likely to benefit from the Project. Women, disabled, old people and children might get injured if they crossed the excavated areas in main streets and allies. Children also may fall down in the excavated areas |
| <b>Natural Gas companies</b>  |  |
| EGAS  | Implementing agency overseeing activities of the Environmental and Social Management Plan  |
| Egypt Gas   | Local distribution company (LDC) who will implement, operate, and manage the ESMP  |
| Butagasco   | May be affected due to the installation of the NG  |
| Petro trade   | They are the responsible entity for collecting the consumption fees and the bank installment   |

#### 8.4 Consultation Methodology and Activities



The research team for this study has adopted multi-dimensional consultation activities that enable the marginalized, voiceless, youth and women to gain information about the project. As well as, gaining information about their concerns and worries that regarding the project during various implementation phases. It is worth to mention that the consultation activities have covered both the PRS and all the Low pressures pipelines networks activities. All questions raised during the public consultation were related to the connection activities (Low pressures pipelines networks), where most of the people are not familiar of the PRS activities. So all questions, comments and responses were concentrated on the NG connection activities and have been addressed in the ESMP studies for the Low pressure network.

Following is the methodology and the main consultation activities adopted by the research team:

- 1- The study team visited the project district in order to define various stakeholders.
- 2- The study team divided the various engagement activities of the project to:
  - Scoping phase,
  - Data collection phase,
  - Consultation activities and final public consultation.
- 3- The study team has adopted many tools during the consultation process such as:
  - Conducting Focus Group Discussions (FGDs) with the local communities.
  - Conducting panel meetings with the governmental officials and potential affected people.
  - Interviews and In-depth discussions
  - Public consultation sessions.
  - Various NGOs participated actively in the preparation of the FGDs and providing data collectors to assist the team in collecting the data.
- 4- Consultation activities have been developed for the different communities through the following phases:
  - a. Phase I: Public Consultation for the framework study December 2013.
  - b. Phase II: Consultation activities (2015-2016) and Public Consultation at the governorate level for the ESIA study, February 2016.
  - c. Phase III: The consultation activities in 2017, **during preparation of ESMP study for four Districts.**
  - d. Phase IV: Consultation activities during the preparation of ESMP and ESIA **studies**, May and July, 2018.

All activities conducted were documented with photos and lists of participants in order to warrantee appropriate level of transparency.

**Table 8-2: Summary of Consultation Activities in Qalyubia Governorate (2013-2018)**

| Participants  | Number                         |            | Methods                  | Date                             |                         |
|---|--------------------------------|------------|--------------------------|----------------------------------|-------------------------|
|   | Males                          | Females    |                          |                                  |                         |
| <b>During the preparation of framework (2013)</b>                         |                                |            |                          |                                  |                         |
| Potential beneficiaries and Government officials<br>Governmental and NGOs | 6                              | 8          | FGD                      | December 2013<br>Data collection |                         |
|   | 3                              | 2          | In-depth                 |                                  |                         |
| Potential beneficiaries   | 69                             | 206        | Structured questionnaire |                                  |                         |
| Potential beneficiaries and government officials, and NGOs                | 63                             | 8          | Public Consultation      | 29 <sup>th</sup> December 2013   |                         |
| <b>Total</b>  | <b>141</b>                     | <b>224</b> |                          |                                  |                         |
| <b>During the preparation of ESIA for El Khosous PRS, (2015 -2016)</b>    |                                |            |                          |                                  |                         |
| Potential beneficiaries and government officials                          | 80                             | 78         | FGD<br>In depth          | September and October 2015       |                         |
| Governmental and NGOs   | 12                             | 4          | In depth                 |                                  |                         |
| Community people  | 477                            | 727        | Structured questionnaire |                                  |                         |
| Potential beneficiaries, government officials, NGO representatives,       | 64                             | 19         | Public consultation      | 10th of February 2016            |                         |
| <b>Total</b>  | <b>633</b>                     | <b>828</b> |                          |                                  |                         |
| <b>During ESMP study for 4 Districts (2017)</b>                           |                                |            |                          |                                  |                         |
| Potential beneficiaries   | El Qalag, El Gabal<br>El Asfar | 10         | 7                        | - FGD<br>-In depth               | February and March 2017 |
|   | Met Asem                       | 7          | 6                        |                                  |                         |
|   | Izbet Afandena                 | 10         | 8                        |                                  |                         |
| Representatives from Egypt Gas and Cairo Gas                              | Egypt Gas                      | 6          |                          | -In depth                        |                         |
|   | Cairo Gas                      | 5          |                          |                                  |                         |
| <b>Total</b>  |                                | <b>38</b>  | <b>21</b>                |                                  |                         |
| <b>During the preparation of ESMP and ESIA (2018)</b>                     |                                |            |                          |                                  |                         |
| Potential beneficiaries   | Qaha                           | 20         | 7                        | FGD                              | May, and July, 2018     |
|   | Kafr Shukr                     | 15         | 6                        |                                  |                         |
| LPG vendors   | Qaha                           | 6          | 1                        | In depth                         |                         |
|   | Kafr Shukr                     | 4          | 0                        |                                  |                         |
| Governmental officials  | Qaha                           | 6          | 3                        | In-depth                         |                         |
|   | Kafr Shukr                     | 5          | 10                       |                                  |                         |
| NGOs  | Qaha                           | 1          | 0                        | In-depth                         |                         |
|   | Kafr Shukr                     | 1          | 0                        |                                  |                         |
| <b>Total</b>  |                                | <b>58</b>  | <b>27</b>                |                                  |                         |





Figure 8-1: Site visits consultation in Qaha district.

### 8.4.1 Summary of consultation activities

Stakeholders' engagement and public consultation activities were conducted in order to ensure that the views and concerns of the local communities are integrated, and guarantee that they are taken into account by the different parties in charge of implementing the project. The views and concerns of local communities are an integral part of the project, and they are to be thoroughly taken into account throughout the different phases of the project.

Throughout the discussion's interviewees were asked about five main points:

- The type of fuels currently in use, and its associated problems.
- The upsides and downsides of NG, compared to other types of fuels.
- The effects of the project during constructions and operations.
- The cost of NG installation to households.
- The future positive/negative impact of NG connections project.

It was notable that the reactions and attitudes of the local communities towards the project are in favor of the project. The field research team noted a strong public support and eagerness towards the project. Beside some legitimate concerns expressed by the public, the field research team recorded the general view that NG is a far better substitute for the type of fuel currently in use.

**Table 8-3** illustrates the different subjects, questions, comments and responses that were discussed throughout the different consultation activities.

**Table 8-3: Key comments and concerns raised during the different consultation activities, and the way they were addressed**

| Subject  | Questions and comments  | Responses   | Addressed in                          |
|--|---|---|---------------------------------------|
| <b>Street Rehabilitation &amp; Land refill</b> | -Who is responsible to rehabilitate the street and land refill after the end of construction works?                       | Egypt Gas responded to this question as they will be the implementing agency responsible for street rehabilitation in terms of budget. However, the LGU will implement the streets rehabilitation according to the street rehabilitation plan.  | ESMP Study <sup>8</sup><br>Section 7. |
|  | -How much is the cost for installing NG to households?<br>-Is there an installment system to settle the installation fee? | The total cost of NG installation is about 7000 EGP. The Government of Egypt pays about 4700 EGP as subsidy to each client. LDCs have agreements with the Egyptian Banks to finance the installation cost for the client, in installment for up to 6 years. AFD in cooperation with EU provide a grant of 1500 EGP for poor people according to illegibility criteria. Moreover, Ministry of Petroleum has announced for new initiative to encourage more people to connect NG by paying the cost in installment for 6 years at zero-interest rate. |                                       |
| <b>The cost of NG installation</b>             |   |   | Section 4.<br>&<br>Section 5          |
| <b>Hotline &amp; customer services</b>         | -Is there a hotline or a customer service office to receive customer complaints?  | There is a grievance redress mechanism which has different channels for receiving complaints such as:<br>Foremen act as the main channel for complaints.<br>Phone numbers of site engineer and SDO.<br>The hotline 129 which is available 7 days/ 24 hours.<br>Information dissemination about the GRM will be shared with the beneficiaries during the process of contracting and disclosed in the contracting office and other publicly accessible venues.  | ESMP Study<br>Section 7               |
| <b>Compatibility of home appliances</b>        | -Do people have to replace their  | The home appliances should be suitable to install the NG. Old appliances might not be suitable to   | ESMP Study<br>Section 2               |

<sup>8</sup> <https://www.egas.com.eg/sites/default/files/2019-10/Qalubia%20ESMP.pdf>



| Subject   | Questions and comments   | Responses   | Addressed in             |
|---|--|---|--------------------------|
| <b>Clear information</b>                        | old home appliances in order to get NG?  | NG installation. Electricity water heater should be replaced by Gas water heater. Additionally, the baking oven will never be connected by NG as the valve is not compatible with the NG.   | ESMP Study Sections 7, 8 |
|   | -The gas company should provide us with clear information about everything related to NG.<br>-shouldn't the gas company distribute flyers or brochures with clear information about Gas. | The LDC adopts multi-level of information sharing. The first level through the contracting office. Posters are installed there to share information about the NG and contracting procedures. Also brochures with clear information about NG project are available at contracting offices. The second level is during the P& A survey where technicians share information about contracting and NG. Additionally, there is a hotline that can share information with any of the targeted beneficiary |                          |
| <b>Eligibility for connecting NG to an area</b> | Why all areas are not connected with NG  | <p>There are some technical and economic criteria's to connect the area by NG</p> <ul style="list-style-type: none"> <li>- First all infrastructure should be available in the area especially sewage system</li> <li>- The area should be crowded and suffer from LPG problems</li> <li>- The area should be near to the national NG network</li> <li>- Detailed technical specifications will be informed to all beneficiaries through the hotline</li> </ul>                                     | ESMP Study Section 2     |
| <b>Loses of income for LPG Vendors</b>          | The NG connection project will affect the source of income for LPG vendors and the distributors (السريحة)  | NG is not going to cover all areas; the Local Council Center will give new license in another area.   | ESMP Study Sections 5, 7 |



## 8.5 Summary of consultation outcomes

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The consultation outcomes revealed that:

- The interviews with the implemented companies revealed that, they are fully aware about security and safety procedures in accordance with the nature of the region.
- The AFD in cooperation with the European Union will provide the poor with a kind of grant to be able to install the NG (nearly 50% of the NG connection cost according to specific criteria). This initiative has been approved and will be applied to all project districts.
- The Ministry of Petroleum Initiative to encourage more people to connect NG by paying the cost in installment for 6 years at zero-interest rate
- The study recommended the participation of the community people in sharing information about NG project with the other people especially the illiterate groups. (the recommendation is not obligated for the project)
- There are many problems related to LPG cylinders such as: (high cost, price fluctuations, the exerted effort to hold and install the cylinder, and the risks related to the existence of LPG cylinder within the household)
- The interviews and the focus group discussions revealed some concerns raised by the community regarding the NG connection such as:
  - o Actual need to provide clear information about the project and some concerns about NG security and safety.
  - o The majority of the community people cannot afford to pay NG installation costs in one installment, they strongly recommended to pay in installments.
  - o Some concerns about LPG security and safety.
  - o The community raised their concerns about the time plan and required approvals that remain as main barriers to install the NG in such areas.
  - o Actual need to response to grievances in timely manner
  - o All heads of municipalities attended various meetings expressed their support to install the NG to their areas. Such attitude is appreciated by Egypt Gas.

**The key message from the consultation events carried out for this project is that Public and government acceptance for and support to the project are very strong.**

## 8.6 ESIA disclosure

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As soon as the site-specific ESIA gets clearance from the World Bank and approval from EEAA, a final report will be published on the WB, EGAS and Egypt Gas websites. A copy of the ESIA report in English and a Summary in Arabic will be made available in the customer service office. Additionally, an Arabic summary will be made available in the contracting offices. An A3 poster will be installed in the contracting office informing about the results of the ESIA and the website link for all studies.