

ABOU QIR-MISR (ALEXANDRIA) METRO PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Abbreviations:

AIIB: Asian Infrastructure Investment Bank

AFD: Agence Française de Développement

E&S: Environmental & Social

EBRD: European Bank for Reconstruction and Development

EIB: European Investment Bank

ESF: Environmental and Social Framework

ESP: Environmental and Social Policy

ESS: Environmental and Social Standard

ESAP: Environmental and Social Action Plan

ESIA: Environmental and Social Impact Assessment

ESHS: Environmental, Social, Health & Safety

ESMS: Environmental & Social Management System

ESMP: Environmental and Social Management Plan

ESS: E&S Standards (as defined respectively by the AIIB or the EIB)

HSEMP: Health, Safety and Environmental Management Plan

NAT: National Authority for Tunnels

NTS: Non-Technical Summary

PR: Performance Requirements (as defined by EBRD's Environmental and Social Policy)

RAP: Resettlement Action Plan

SEP: Stakeholder Engagement Plan

The AFD, AIIB, EBRD and EIB are all together referred to as the "Lenders"

The "Lenders Requirements" refer to the World Bank ESF (referred to by AFD), the AIIB ESF, the EBRD ESP and the EIB ESS.

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
Assessment and Management of Environmental and Social Impacts and Issues						
1.1	ESAP owner Assign and maintain a person responsible for the ESAP implementation (the "ESAP owner") within NAT, with a direct reporting line to NAT Project manager. The ESAP owner must be a suitably qualified environmental and/or social specialist, with previous experience delivering E&S compliance in the context of internationally financed projects.	Assignment of responsibilities Ensure implementation of the ESAP	AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	NAT Project manager	ESAP owner role assigned at financial close; position maintained for the entire duration of the financing agreement	Position assigned and maintained. CV submitted to lenders for non-objection. Names and contacts (email / phone) provided to Lenders in E&S reports.
1.2	E&S resources Budget and plan human and financial resources that are necessary to achieve effective implementation of all the ESAP actions	Ensure environmental and social performance and effective implementation of ESMS	AIIB ESS1 EIB ESS1 EBRD PR1 IFC PS1	Budgeting for financing purpose: NAT Project manager, in coordination with the Lenders Detailed budgeting and planning for implementation: ESAP owner	Prior to financial close At the beginning of the ESAP owner's involvement	E&S resources included in the Project's financing plan before financial close Detailed budget and implementation planning for ESAP.

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1.3	<p>Allocation and integration of E&S actions in contracts Screen all E&S actions required in the E&S plans disclosed to the public, including the ESIA, the ESMP, the RAP, the SEP and the ESAP, and allocate their implementation responsibility to NAT, the contractor(s) or the delegated operator. Ensure this implementation responsibility is included in the relevant tender/contractual documents, with detailed specifications where needed for the sake of clarity/efficiency.</p>	Continuity of E&S obligations	Good national and international practice AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	ESAP owner in coordination with the consultant/engineer in charge of the tender/contract documentation preparation, and with support from NAT Project manager to ensure application of this requirement	During the preparation of the tender documents for contractors and the delegated operator	Requirement added to the operator's contractual obligations.
1.4	<p>Monitoring the effective implementation of disclosed plans Organize monitoring of the effective implementation of the E&S plans disclosed to the public, including the ESIA, the ESMP, the RAP, the SEP and the ESAP, as allocated under action 1.3.</p>	Ensure environmental and social performance and effective implementation of ESMS	AIIB ESS1 EIB ESS1 EBRD PR1 IFC PS1	ESAP owner	As per the timeline indicated in the different plans	Plans effectively implemented. Corrective or adaptive management actions implemented in line with Lenders Requirements and reported to lenders.
1.5	<p>E&S reporting to lenders Submit report on ESAP implementation and the environmental, social, health and safety performance of the Project.</p>	Monitoring & reporting	AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	ESAP owner	Quarterly during construction. Annually during operation	Submission of annual report to the satisfaction of the lenders. The format of the report will be provided by EBRD.

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
1.6	<p>Continuity of E&S obligations In each contract signed by NAT in relation to the Project design, construction or operation, add a clause requiring the contracted party to:</p> <ul style="list-style-type: none"> (i) commit to complying with the lenders requirements (ii) assign and maintain a person in charge of E&S compliance with the lenders requirements (iii) commit to implementing or facilitating the implementation of the E&S actions described in the Project's E&S documentation disclosed by lenders, when the implementation of such actions directly or indirectly depends on the contracted party. (iv) reflect these same four requirements in the contract of any party subcontracted in relation to the Project 	Contractual continuity of E&S obligations	AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	ESAP owner with support from NAT Project manager to ensure application of this requirement	When preparing and in any case before signing the contracts in question	Statements in E&S reports to lenders to confirm the effective inclusion of the clause in each Project related contract.
1.7	<p>Permits and authorizations Obtain and maintain all necessary environmental, social and health& safety permits and authorizations required for the Project.</p>	Compliance with regulatory requirements	Egyptian law	ESAP owner	As required by national regulations.	Permits and authorizations obtained and maintained.
1.8	<p>E&S Policy NAT management to finalize, sign and disclose internally and on NAT's website the company's Environmental and Social Policy in line with Lender requirements.</p>	Management's commitment to E&S performance	AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	NAT Top Management	Before first disbursement	E&S policy finalized, signed, shared with lenders and disclosed on NAT's website.

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1.9	<p>Corporate ESMS Development and implementation of a corporate ESHS management system. The system will include:</p> <ul style="list-style-type: none"> • Policy; • Objectives, targets • Identification of legal and other requirements; • Risk assessments of activities (inclusive of all ESHS topics); • Procedures and operational controls to minimise impacts; • Training and communication • Monitoring of performance; • Internal reviews and audits; • Management reviews. <p>The ESHS Management System will be applicable and relevant to any party contracted by NAT in relation to the Project design, construction or operation.</p>	<p>Optimisation of environmental management through a formalised system</p> <p>Ensure contractor adoption of corporate policies and procedures</p>	<p>AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)</p>	<p>NAT Top Management</p>	<p>ESHS Management System ready within one year of signing</p>	<p>Develop and implement an ESMS in line with ISO 14001 or equivalent</p> <p>Contractors E&S management plans/systems consistent with NAT ESHS Management system</p>
1.10	<p>Contractors HSEMP NAT to request, review, approve and monitor the preparation and effective implementation of a Health, Safety and Environment Management Plan (HSEMP) by each company contracted for the construction or operation of the project.</p>	<p>Continuity of E&S obligations</p>	<p>Egyptian law AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)</p>	<p>ESAP owner with support from NAT Project manager to ensure application of this requirement</p>	<p>HSEMP to be approved prior to the start of activities by the Contractor</p>	<p>HSEMP prepared by contractors, and approved by NAT</p>

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1.11	<p>Contractors HSEMP implementation Each company contracted for the construction or operation of the Project must implement the Health, Safety and Environment Management Plan (HSEMP) approved by NAT (see previous action), as well as any corrective action requested by NAT or the Lenders. Each contractor must request its sub-contractors to prepare a sub-plan in line with the HSEMP and to implement it. Each contractor is responsible for the ESHS performance of its subcontractors.</p>	Compliance with E&S commitments	Egyptian law AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	Contracted company's ESHS manager Monitoring by NAT's ESAP owner.	During the period of effectiveness of the contracted company's contract	Requirement added to the company's E&S contractual obligations. HSEMP effective implementation monitored and documented by NAT, with a record of near misses, incidents, accidents and corrective actions.
1.12	<p>Operator's management system NAT to require (contractual obligation) and monitor that the future operator of the Project develops and implements a management system certified under the ISO9001, ISO14001 and ISO 45001 standards (or equivalent internationally recognized and certified standards)</p>	Continuity of E&S obligations	Good national and international practice AIIB ESS1 EBRD PR1 EIB ESS1 WB ESS1 (AFD)	Operator's quality assurance manager Monitoring by NAT's ESAP owner.	Management system prepared before operation starts	Requirement added to the operator's contractual obligations. Effective implementation and certification monitored and documented by NAT.
Labour and Working Conditions						

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No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
2.1	<p>HR policy Require the EPC contractor(s) and the delegated operator to prepare and implement an HR policy aligned on the Egyptian legislation and the Lenders Requirements. The HR policy will be submitted to NAT's approval. The HR policy will address:</p> <ul style="list-style-type: none"> • Code of conduct • Avoidance of any form of direct or indirect illegal/unformal employment • Child labour and forced labour • Non-harassment, non-discrimination and equal opportunity • Gender based violence • Workers' organisations • Workers accommodation • Wages, benefits and conditions of work • Security personnel requirements • Workers grievance mechanism (see action 2.3) <p>The HR policy will be attached to the contract of each worker/employee hired by the contractors, the operator, or their subcontractors.</p>	Appropriate management of workers, contractors working conditions and provisions	<p>AiIB ESS1 EIB ESS8 EBRD PR2 WB ESS2 Law 12/2003 Law 12/1996</p> <p>For workers accommodation, IFC/EBRD's 2009 guidance note must be complied with.</p>	<p>Contracted company's ESHS manager</p> <p>Monitoring by NAT's ESAP owner.</p>	Approved HR policy within one month after contracts entered into force – contract on hold if the requirement is not satisfied.	<p>HR Policy compliant with lender standards signed by top management and cascaded to all employees, contractors, suppliers</p> <p>Disclosed to all employees in a language they can understand</p>

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2.2	<p>Illegal employment monitoring Organize random HR monitoring through interviews of workers hired by contractors or subcontractors involved in the Project construction, to verify that the HR policy was communicated to them, that they are formally employed, and that they are aware of the grievance mechanism. Report instantly illegally/informally employed workers. Exclude (sub)contractors who hired staff illegally: temporarily on 1st instance, permanently on 2nd instance.</p>	<p>Ensuring compliance with national labour law, EBRD requirements and NAT's HR policy</p>	<p>AIIB ESS1 EIB ESS8 EBRD PR2 IFC PS2 Law 12/2003 Law 12/1996</p>	<p>ESAP owner for the monitoring and reporting Project manager for the exclusion of (sub)contractors</p>	<p>During construction</p>	<p>Random HR monitoring and reporting done weekly. Non-compliant (sub)contractors excluded</p>
2.3	<p>Workers grievance mechanism Set up and maintain a formal grievance mechanism for employees and contractors employees, and disseminate information about its uses to workforce.</p>	<p>To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.</p>	<p>EBRD PR2</p>	<p>ESAP owner Contracted company's ESHS representative</p>	<p>Grievance mechanism ready before signing contracts with contractors Dissemination through contractors and their sub-contractors</p>	<p>Adoption of formal grievance mechanism at NAT Grievance register with recorded grievances</p>
<p>Resource Efficiency and Pollution Prevention and Control</p>						

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No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
3.1	<p>Asbestos management Include in the terms of reference of the contractor in charge of civil works the following requirements:</p> <ul style="list-style-type: none"> - Identify (exact location and volumes) asbestos containing material and structures based on NAT's preliminary assessment. - Prepare and submit to NAT's approval an Asbestos Management Plan including: (i) Removal of all asbestos contaminated material/structures prior to other civil works, to be done by trained workers, with relevant protection equipment and dissemination prevention barriers; (ii) Procedure for transport and landfilling to be prepared and submitted to NAT. Transport and landfilling of asbestos material in compliance with the Egyptian regulation and in line with the pollution control principles set in the EU Directive 1999/31. The procedure must be designed to limit the dispersion in the environment and the exposure of workers and the public to the asbestos fibres. 	Asbestos fibre dissemination prevention	AIIB ESS1 EIB ESS2 EBRD PR3 IFC PS3 Good international practice	ESAP owner with support from NAT Project manager to ensure application of this requirement	During the tender documents preparation	Indication in the bidding documents of the location of asbestos containing material identified in the ESIA Inclusion of relevant requirement in the tender documentation

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
3.2	<p>Asbestos removal and disposal Implementation of the asbestos management measures (see previous action) by the civil contractor.</p>	Asbestos fibre dissemination prevention	<p>AIIB ESS1 EIB ESS2 EBRD PR3 IFC PS3 Good international practice</p>	<p>Plan preparation and implementation: Contractor who was assigned this task in his ToR.</p> <p>Plan approval and supervision: ESAP owner with support from a specialized expert/consultant.</p>	Before other civil works in the contaminated zones.	Asbestos Management Plan prepared by the contractor, approved by NAT, and implemented by the contractor under NAT's supervision
3.3	<p>Energy efficient buildings Include in the terms of reference of the contractor in charge of civil works the obligation to design energy efficient buildings. Explicit reference must be made to internationally recognized requirements for energy efficient buildings, such as the consolidated EU directive on the energy performance of buildings.</p>	Promoting resource efficiency	<p>AIIB ESS1 EIB ESS2 EBRD PR3 IFC PS3 Good international practice</p>	ESAP owner with support from NAT Project manager to ensure application of this requirement	During the tender documents preparation	Requirement for energy efficient building included in the tender and contractual documents of the contractor, with explicit reference to internationally recognized requirements.
3.4	<p>Pesticides ban NAT to ensure use of acceptable herbicides for vegetation control along the metro line across construction and operation</p>	Human and environmental protection	Good international practice	ESAP owner with support from NAT Project manager to ensure inclusion of this requirement in the contractors/delegated operator contracts	<p>Inclusion during contract preparation.</p> <p>Monitoring across construction and operation.</p>	<p>Contractors and delegated operator contractually bound not to use pesticides.</p> <p>Monitoring.</p>

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
3.5	<p>Polluted soils management Include in the terms of reference of the contractor in charge of civil works the following requirements: - Identify through detailed surveys exact location and volumes of polluted soils based on NAT's preliminary assessment. Surveys must be conducted in all acquired land plots, including the depot area and new stations. - Prepare and submit to NAT's approval a Polluted soils Management Plan including: (i) Removal of all polluted soils prior to other civil works, to be done by trained workers, with relevant protection equipment and dissemination prevention barriers; (ii) Procedure for transport, treatment and disposal.</p>	Polluted soil contamination prevention	AIIB ESS1 EIB ESS2 EBRD PR3 IFC PS3 Good international practice	ESAP owner with support from NAT Project manager to ensure application of this requirement	During the tender documents preparation	Indication in the bidding documents of the location of polluted soils identified in the ESIA, including the nature of the pollutants Inclusion of relevant requirement in the tender documentation
Workers health & safety						

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
4.1	<p>Construction contractors and delegated operator: workers health & safety requirements Under actions 1.11 and 1.12, require contracted parties to address as a minimum the following requirements in the HSEMP:</p> <ul style="list-style-type: none"> - organizational capacity and competency; - roles and responsibilities; - identified risks (i.e. risk register) and impacts, for workers and surrounding communities; - personal and collective protection equipment requirements; - training requirements, including HSE induction for workers and visitors; - controls for high risk activities through the implementation of a permit to work system; - internal and external inspections and monitoring; - record keeping for total man-hours worked, incidents, accidents, fatalities, near misses, unsafe acts/unsafe conditions; - first aid and emergency procedures 	<p>Minimizing accidents and incidents</p> <p>Identification of hazards, effectiveness of mitigation measures and risk assessment</p>	<p>AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS2 Law 12/2003 Good international practice</p>	<p>ESAP owner Contracted company's ESHS manager</p>	<p>Together with action 1.11 / 1.12</p>	<p>Robust contractor's / operator's health and safety management plans</p>
4.2	<p>Health & safety monitoring Mobilize qualified and experienced personnel for overseeing health and safety performance across construction and operation.</p>	<p>Protecting the workforce Improving health and safety performance</p>	<p>AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS2 Law 12/2003 Good international practice</p>	<p>ESAP owner</p>	<p>During construction and operation</p>	<p>Qualified H&S specialists mobilized in appropriate number to monitor the H&S performance of contractors and of the delegated operator.</p>

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Communities and customers health & safety						
4.1	Safety by design: The Contractor will design and build the Project with all the equipment, features, mechanisms and collective protection equipment that are or will be necessary for the safe use by customers, and the safe operation and maintenance of the Project across its lifetime.	Prevention of public risks	AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS4 Good international practice	Design engineer under the EPC contractor	During design	All the equipment, features, mechanisms and collective protection equipment that are or will be necessary for the safe operation and maintenance of the Project are included in the design, and built.

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
4.2	<p>Public safety during construction and operation Prepare and implement a safety management plan for the construction and operation phases of the current Project including at least the following:</p> <ul style="list-style-type: none"> - Risk register identifying safety risks to the project and risks posed by security measures to communities/metro users - Description of fencing or other barriers at station ends and other locations to prevent access to tracks by unauthorized persons - Description of security equipment to be deployed at stations and along the alignment - Locations of closed-circuit television to monitor stations and other areas to detect where trespassing occurs - Required training for security guards in use of force and conflict de-escalation measures - Security guard screening criteria and required background checks prior to their appointment 	Site safety and proper response to threats	AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS4 Good international practice	EPC Contractor/Delegated Operator, respectively for the construction and operation phases.	Prior to the respective construction and operation phases	Security management plan prepared, approved by NAT, and implemented

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4.3	<p>Noise and vibration control Incorporate in the technical specifications for EPC lot 1 (civil works) (i) the technical specifications for the Rolling stock that will be supplied, (ii) an obligation to survey during one week the pre-existing noise and vibration levels at 20 sensitive locations (5 closest cultural heritage/historical sites, 5 closest public schools or hospitals, and 10 closest apartment buildings) identified by NAT along at-grade and elevated sections, and (iii) an obligation to provide a design (infrastructure design, anti-noise barriers, speed limits...) acceptable to NAT, that allows not exceeding the pre-existing vibration levels and not exceeding by more than 3dB the pre-existing noise levels. Pre-existing noise levels must be measured when the existing ENR trains are passing, without their horn in action.</p> <p>At commissioning and in any case before final payment for EPC lot 1, procure an independent noise and vibration survey to verify that the technical specifications for noise and vibration are met. If not, require corrective actions from the EPC contractor for lot 1.</p>	<p>Minimization of noise / vibration impacts for neighbouring communities</p>		<p>ESAP owner with support from NAT Project manager and TC Consultant to ensure inclusion of this requirement in the contractors/delegated operator contracts</p>	<p>Inclusion during contract preparation. Monitoring across construction and operation.</p>	<p>Contractors and delegated operator contractually bound not to exceed noise and vibrations limits.</p> <p>List of sensitive receptors to be surveyed before and after project implementation established by NAT</p> <p>Commissioning survey and further monitoring undertaken by NAT.</p>

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4.4	<p>Traffic management and alternative transport Provide evidence that arrangements are in place with Alexandria Governorate and local traffic authority to allow the implementation of the Traffic Management Plan and the alternative transport solution during construction. Monitor their effectiveness during construction, and agree remedial measures in case of obvious lack of results.</p>	Coordinated effort to manage traffic in project area	AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS2	ESAP owner	During construction	<p>Minutes of meetings with Alexandria Governorate and traffic authority showing arrangements.</p> <p>Disclosure of agreed arrangements through local medias</p>
4.5	<p>Pedestrian crossings Prepare and submit to NAT's approval a design ensuring availability of a secured and accessible pedestrian crossing every 200m (in densely inhabited areas where numerous informal crossings are existing) or every 400m in other sections. The number and location of pedestrian crossings will be subject to NAT's approval.</p>	Avoidance of illegal crossings risks	AIIB ESS1 EIB ESS1 EBRD PR4 IFC PS2	Design engineer under the EPC contractor for lot 2	During design	<p>Pedestrian crossings design meeting the minimum distance criteria submitted by the design engineer, reviewed and approved by NAT, and implemented by the contractor for lot 2.</p>
Land Acquisition, Involuntary Resettlement and Economic Displacement						

No.	Action	E&S Risks	Source of requirement	Responsibility and resources	Timetable	Target and Evaluation Criteria for Successful Implementation
5.1	<p>Resettlement Action Plan preparation Based on the disclosed Resettlement framework, prepare a Resettlement Action Plan (RAP) meeting lenders requirements. Include in the RAP (i) procedures for planned and unexpected land acquisition, (ii) procedures for mosques relocation, (iii) procedures to identify and assist vulnerable persons, (iv) RAP implementation details and financing responsibilities, (v) a grievance mechanism.</p>	Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land	AIIB ESS2 EIB ESS6 EBRD PR5 IFC PS5	ESAP owner, with support from a specialized consultant	Prior to first loan disbursement	Completed RAP approved by lenders
5.2	<p>Resettlement Action Plan implementation Implement the agreed RAP, with attention to the following points: (i) Ensure all due payment, support and entitlements identified in the RAP are completed before PAPs are impacted, (ii) Ensure that vulnerable persons are provided with the planned assistance, (iii) document all the RAP implementation steps.</p>	Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land	AIIB ESS2 EIB ESS6 EBRD PR5 IFC PS5	ESAP owner, with support from a specialized consultant	Prior to impacts	RAP implemented
5.3	<p>Quarterly reports Submit quarterly reports showing RAP implementation progress. Report to include at least information on compensations / payments made, stakeholder engagement activities undertaken, grievances, unexpected land acquisition.</p>	Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land	AIIB ESS2 EIB ESS6 EBRD PR5 IFC PS5	ESAP owner, with support from a specialized consultant	Ongoing during RAP implementation	RAP progress report submitted to lenders

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5.4	External audit Facilitate the procurement of an external audit of the RAP implementation process through the lenders, including any necessary corrective actions.	Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land	AIIB ESS2 EIB ESS6 EBRD PR5 IFC PS5	Independent consultant	Upon concluding RAP implementation	RAP completion report submitted to lenders Corrective actions implemented by NAT
Cultural Heritage						
8.1	Clearance letter Obtain clearance from the Ministry of Tourism and Antiquities	Protection of cultural heritage	AIIB ESS1 EIB ESS5 EBRD PR8 IFC PS8 Law 117/1983	ESAP owner	Prior to construction	Clearance letter from Ministry of Tourism and Antiquities
8.2	Chance find training Ensure the EPC contractor and all Project workers (especially those involved in excavation and earth works) are trained on the chance find procedure, including exercise to recognize chance finds.	Protection of cultural heritage	AIIB ESS1 EIB ESS5 EBRD PR8 IFC PS8 Law 117/1983	Civil works contractor(s)	Prior to construction	Training records
Information Disclosure and Stakeholder Engagement						
10.1	Stakeholder engagement plan Implement lender approved Project SEP, with available documentation for all stakeholder activities and logging of grievances to inform the annual monitoring report	Continuous engagement with direct and indirect stakeholders	AIIB ESS1 EIB ESS10 EBRD PR10 IFC PS1	ESAP owner with technical assistance consultants	As per SEP	Minutes of meeting with stakeholders Documentation supporting SEP activities
10.2	SEP revision and update Regularly revise and update the SEP to ensure that meaningful information is disclosed to communities and users.	Information dissemination Management of community expectations	AIIB ESS1 EIB ESS10 EBRD PR10 IFC PS1	ESAP owner with technical assistance consultants	Annually	SEP revised and updated as necessary (and at least before operation starts)

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10.3	Grievance mechanism implementation Implement Project-specific community/metro users grievance mechanism	Promptly addressing community concerns and maintaining project acceptability	AIIB ESS1 EIB ESS10 EBRD PR10 IFC PS1	ESAP owner during construction Delegated operator during operation	Across construction and operation	Grievance register maintained, including resolution
10.4	Metro users relations Put in place a customer relations service readily accessible by phone/social media/internet to interact with customers and provide up to date information on timetables, tariffs, accessibility, temporary closures, etc... Train the staff of this service to customers management (including aggressive customers) and grievances management.	Customer relations, quality of service	AIIB ESS1 EIB ESS10 EBRD PR10 IFC PS1	Delegated operator	Prior to operation	Customer relation service designed and put in place by the delegated operator, approved by NAT.
10.6	Metro users satisfaction Monitor metro users satisfaction on (i) tariffs, (ii) timetables, (iii) violence and harassment, (iv) accessibility and (v) cleanliness / hygiene, through an independent auditor, using a robust method that allows identifying trends. Disclose results on the customers interface website, identify needs for improvements, and disclose improvement measures put in place.	Customer relations, quality of service	AIIB ESS1 EIB ESS10 EBRD PR10 IFC PS1	Delegated operator	During operation	Customer satisfaction monitored and continuously improved.