Emergency Labor Intensive Investment Project

(ELIIP)

Environmental Safeguards Guidelines

for

Household Units Rehabilitation

Sub-Projects

March 2013

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List of Acronyms

CUA	Central Urbanization Agency
EEAA	Egyptian Environmental Affairs Agency
EIA	Environmental Impact Assessment
ELIIP	Emergency Labor Intensive Investment Project
EMP	Environmental Management Plan
ESSAF	Environmental and Social Screening and Assessment Framework
IAs	Intermediate Agencies
MoHUC	Ministry of Housing and Urban Communities
MSDS	Material Safety Data Sheet
PIU	Project Implementaion Unit
SA	Sponsoring Agencies
SFD	Social Fund for Development
VOCs	Volatile Organic Compounds
WB	The World Bank

1. Introduction

The Emergency Labor Intensive Investment Project (ELIIP) has been launched in October 2012, the project is being implemented by the Social Fund for Development (SFD) with support from the World Bank (WB). The objectives of the project are to create short-term employment opportunities for unemployed unskilled and semi-skilled workers and to provide access to basic infrastructure services to the target population in poor areas. Many sub-projects will be implemented under the ELIIP umbrella in different sectors including: rehabilitation of houses and schools, canal cleaning and weeds reduction, River Nile bank protection, surfacing and completing rural roads, cleanliness campaigns and waste collection from villages, early childhood education services, outreach of maternal and child health and youth employment in rural and urban settings. The implementing agency of the project is SFD who will sign agreements with Sponsoring Agencies (Ministries, Governorates and NGOs in corresponding sectors) for the execution of the project in different Governorates. The Sponsoring Agencies (SAs) will sign a contract with Intermediate Agencies (IAs) to carry out all the technical support and supervision tasks. The IAs in turn sign contracts with the contractors to execute the project activities.

During the project appraisal an Environmental and Social Screening and Assessment Framework (ESSAF) has been prepared for the ELIIP. The ESSAF has concluded that all the project's interventions fall into Category B or Category C according to the World Bank Environmental Assessment Safeguard Policy (OP 4.01). None of the other nine Environmental and Social Safeguard policies will be triggered according to the ESSAF. The ESSAF has been consulted with different stakeholders during March 2012.

The Loan Agreement between the SFD and the WB has stipulated that in the event that the ESSAF requires the preparation of an EIA/EMP, and/or Environmental Safeguard Guidelines specific for each type of sub-projects such documents should be prepared according to the type of sub-projects and expected environmental impacts.

The Household Units Rehabilitation sub-projects, subject of these Guidelines, are considered to have few and limited environmental issues and impacts, therefore these Environmental Safeguard Guidelines were prepared in response to the Loan Agreement requirements, so that any negative impacts could be adequately managed by the project stakeholders.

2. Sub-Projects Rationale and Activities

The Household Units Rehabilitation component of the ELIIP comprises carrying out structural rehabilitation and maintenance works in a number of household units at different Governorates. These types of sub-projects are carried out by the Ministry of Housing and Urban Communities (MoHUC) for improving living conditions for poor households. MoHUC identifies the maintenance

works that are required for identified household units at different governorates according to the reports received from the Central Urbanization Agency (CUA) at different governorates; accordingly the MoHUC sets the maintenance priorities according to the need. The standard rehabilitation and maintenance works that will be carried out in ELIIP sub-projects will comprise the following:

- Demolition and removal of damaged items: including concrete objects, walls, ceilings from wood and corrugated sheets, floor and wall tiles and sanitary ware.
- Installation of new items: including normal and reinforced concrete objects, foundation works, brick walls, floor tiles, sanitary ware and plumbing works, septic tanks, external and internal wall paints, and electric works.
- Repair and maintenance of some damaged items including: repairing cracking brick walls, repairing and replacing wood ceilings, doors and windows

Household Units Rehabilitation sub-projects will be implemented during the first year of the project in 1,747 household units in 3 Governorates, with a total cost of about L.E. 75 millions as indicated in Table 1below.

Table 1: Governorates where Household Units Rehabilitation sub-projects will be implemented during the first year of the project

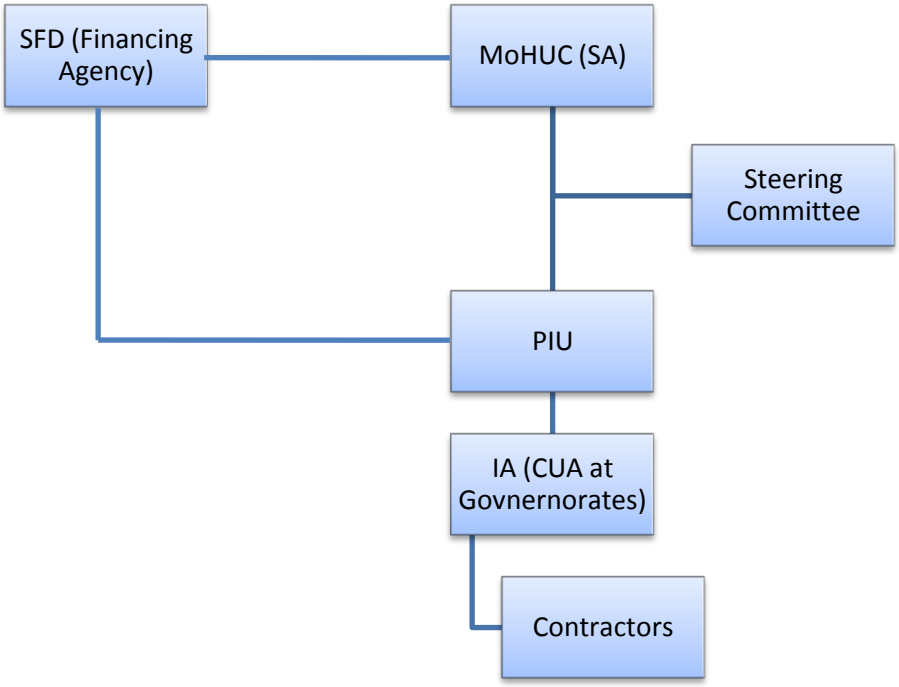
Menya		**Asiut**		**Sohag**	
No. of units	Cost (1,000 L.E)	No. of units	Cost (1,000 L.E)	No. of units	Cost (1,000 L.E)
236	**10,735**	**1,194**	**49,125**	**317**	**14,265**

Total	
No. of units	**Cost (1,000 L.E)**
1,747	**74,125**

The SA for these sub-projects is MoHUC and the IAs are the CUA in the Governorates. The implementation of the projects will be carried out by the contractors at different governorates according to the chart illustrated in

Figure 1 below.

Figure 1: Organizational chart for the sub-project implementation



3. Environmental Conditions and Guidelines

Household Units Rehabilitation sub-projects are expected to yield many environmental benefits. In addition to achieving the objective of the project of improving the living conditions of poor households and alleviate some socioeconomic difficulties, the sub-projects will also achieve direct environmental benefits such as:

- Improving the indoor air quality through removing cracking and damaged painting, preventing/reducing dust emissions in which some these emissions may contain hazardous materials (such as lead-containing dusts from old lead paints and other Volatile Organic Compounds)
- Improving hygienic conditions through repairing and replacing damaged sanitary ware, installing new plumbing works and improving water supply
- Reducing leakage of wastewater to the environment through installing new septic tanks
- Reducing negative exposure to extreme weather conditions through repairing ceilings and windows
- Improving illumination and ventilation at households

On the other hand, the sub-projects could cause limited negative impacts mainly related to managing construction chemicals the wastes. The more important impacts are caused by managing chemicals,

such as paints, pigments and cohesive agents. The application of such chemicals on surfaces of walls and floors is associated with the emission of Volatile Organic Compounds (VOCs) which have different health effects according to the type of used solvents, the VOCs normally remain in the indoor environment for few days until the solvents are evaporated, and water-based paints that include less VOCs evaporate more rapidly. Therefore, households should be away from painted surfaces until the VOC smell is totally diluted. It is worth noting that lead-based paints are not officially banned in Egypt, however, because such paints are banned in many countries since the early eighties it is believed that recognized paint manufacturers, especially international ones, will avoid using lead-based paints and the ingredients of the paints will be documented on the Material Safety Data Sheet (MSDS). This may not apply to blended paints in-situ, therefore these Guidelines require contractors to use paints that are packed in sealed containers from a recognized manufacturer with the paint's ingredients documented on a MSDS.

Waste management issues are related to the adequate handling of wasted items previously indicated in Section 2. If the Regular waste (bricks, concrete, tiles … etc.) is collected and adequately transferred to an authorized disposal site the environmental impacts will be minimal.

The work would be associated with some noise and dust emissions, especially demolition works; however, such emissions are expected to be limited in effect and in impact. Having the rehabilitation works done during daytime will make such impacts insignificant.

The following proposed waste management procedures are expected to prevent/minimize such negative impacts:

- Contractors should use for in-door painting only use packaged paints from a recognized manufacturer from water-based paints. In-door painting works should be carried out in well ventilated areas; this ventilation should be continued after finishing painting at a specific area for 3 days. Access of households to painted areas should be at least one week after the drying of the paint. No paint containers should be stored at site after finishing the work to avoid associated VOC emissions.
- Contractors should collect wasted items at a specific area and transfer these items, either for recycling or to an authorized disposal site, at least at the end of a working week.
- Noisy demolition and excavation works should be only carried out during daytime, no such works are permitted before 07:00 or after 18:00. No visible dust emissions should be generated; in such cases the contractor should spray water to suppress dust generation.
- The Intermediate Agencies (CUA at governorates) should make sure that the contractor abide to the above conditions through including them to the contract (see Annex 1), review paints purchase documentation, conducting occasional site supervision during the process to make sure that the above site measures are being complied with. The IA should also prepare a complaint log that will record any received complaints by neighbors from noise, dust or un-authorized disposal of the waste.

Most of the above conditions and guidelines are management and administrative actions that do not entail extra costs as they could be performed by the regular project staff. The main item that may entail extra cost is purchasing water-based paints for indoor-paints from a recognized manufacturer, which may not be a common practice by small-scale contractors and painting technicians, however, the extra cost expected for compliance to this measure is not expected to be major, as cost of indoor painting comprise relatively low ratio to the total cost.

The reporting of environmental measures carried out will be along with the regular progress reports prepared for the project on a quarterly basis. The progress report should have a section on environmental measures where IAs will report on quarterly basis to the SA on any violations recorded or complaints received from local communities and this report also must summarize all constraints that have risen during that period of time, methods of overcoming difficulties as mentioned in Annex 3. The SA will collectively report to the SFD on a quarterly basis including the reports received from the IAs as annexes.

A final report must be presented to the SFD by the SA before the end of the project termination date, to include all environmental data pertaining to the project including social and environmental impacts experienced during the project implementation.

Table 2 below summarized the roles and responsibilities of different project stakeholders for implementing and supervising the above conditions. Also Annex 1summarizes the environmental responsibility of the contractor in a form that could be annexed to contractor contracts, while Annex 2 summarizes the responsibilities of the SA and IA so that this list could be annexed to the SFD Framework Agreement with the SA.

Table 2: Required Environmental Conditions to be followed during the implementation of the sub-projects

Issue	Required actions	Responsibility of implementation	Responsibility of supervision/ monitoring	Means of supervision/monitoring
Indoor air quality affected from chemicals in paints	Used paints should be water-based in containers of a recognized manufacturer. Painted areas should be left to dry for one week before households could use them	The contractor	IAs	- Including this condition in the contract with the contractor (see Annex 1) - Review MSDS of used paints and purchase receipts - Carry out occasional visual inspections to make sure that only purchased paints are used
Unauthorized waste disposal	Waste to be collected at certain location and exported for authorized disposal or recycling site at the end of each working week	The contractor	IAs	- Including this condition in the contract with the contractor (see Annex 1) - Recording complaints from neighbors about unauthorized disposal in a complaints log
Noise and dust emissions	Noisy works to be carried out between 07:00 and 18:00. Visible dust emissions to be suppressed by water spraying	The contractor	IAs	- Including this condition in the contract with the contractor (see Annex 1) - Recording complaints from neighbors in a complaints log

Annex 1: Responsibilities of the Contractor in Implementing Environmental Conditions

The contractor should comply with the following environmental conditions:

- The contractor should use water-based paints for indoor painting. The paints should be from a recognized manufacturer with the MSDS available. The contractor should provide copies from indoor paints purchase receipts and copies from the MSDS to the CUA.
- The contractor should transfer the collected waste from any site on weekly basis either to be reused or to the ___(specify authorized disposal site name)__ disposal site.
- Noisy activities should only take place between 07:00 and 18:00
- Excavation and demolition activities should be associated with prior water spraying of the site to suppress dust emissions.
- Except for cases that are beyond the contractor's control, abiding to these conditions is a prerequisite for settling the contractor's payment on the work.

Annex 2: Responsibilities of the SA and IAs

The Sponsoring Agency (MoHUC) should comply with the following environmental conditions:

- Supervise the timely implementation of Intermediate Agencies of their environmental conditions and the periodic reporting on environmental measures with progress reports

The Intermediate Agencies (CUAs at concerned Governorates) should comply with the following environmental conditions:

- Review the contents of indoor paints used by the contractor in the MSDS and make sure they are water-based and do not contain lead compounds. The MSDS should be annexed to the next progress report prepared for the project.
- For each project area IAs should request an official letter from the Local Authority identifying the authorized disposal site in the area. The name of disposal site should be included in the contractor's contract, and the correspondence with the Local Authority should be annexed to the next progress report prepared for the project.
- Prepare complaint's log about the sub-project, this log will include records of any complaints from the local community on noise, dust or unauthorized disposal of waste. Recorded relevant complaints and measures taken in response to the complaint should be included in the project progress reports.

Annex 3: Standard Reporting Format

Project Code:		Project Name:			Report Date:	
No.	Governorate / Address	Household owner	Working duration		Violation	Action Taken
			Start date	End date		
1						
2						
3						
4						
5						
6						
7						
8						