Emergency Labor Intensive Investment Project

(ELIIP)

Environmental Safeguards Guidelines

for

Schools Rehabilitation

Sub-Projects

March 2013

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List of Acronyms

DoH	Directorate of Housing
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
MoE	Ministry of Education
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 Schools 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 Schools Rehabilitation component of the ELIIP comprises carrying out structural rehabilitation and maintenance works in a number of schools at different Governorates. These types of sub-projects are carried out by the Ministry of Education (MoE) on routine basis for maintaining the suitable environment in for the educational process at schools and educational institutes. MoE

identifies the maintenance works that are required for schools at different governorates according to the reports received from Directorates of Housing (DoH) at different governorates; accordingly the MoE 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 walls, floor and wall tiles, wood work, furniture, electric wires and sanitary ware
- Installation of new items: including concrete pavements, corrugated sheets, foundation works, brick walls, floor and wall tiles (ceramics and concrete), sanitary ware and plumbing works, booster pumps, electric works (wires, illumination units, adapters, electric keys, panels, bells, fans)
- Repair and maintenance of some damaged items including: polishing of floor tiles and fixing cracks, repairing cracking brick walls, repairing wood works (doors, windows, blackboards, wood floors including re-painting …etc.) internal and external wall painting

School Rehabilitation sub-projects will be implemented for 3 years in 485 schools in 15 Governorates, with a total cost of about L.E. 220 millions as indicated in Table 1below.

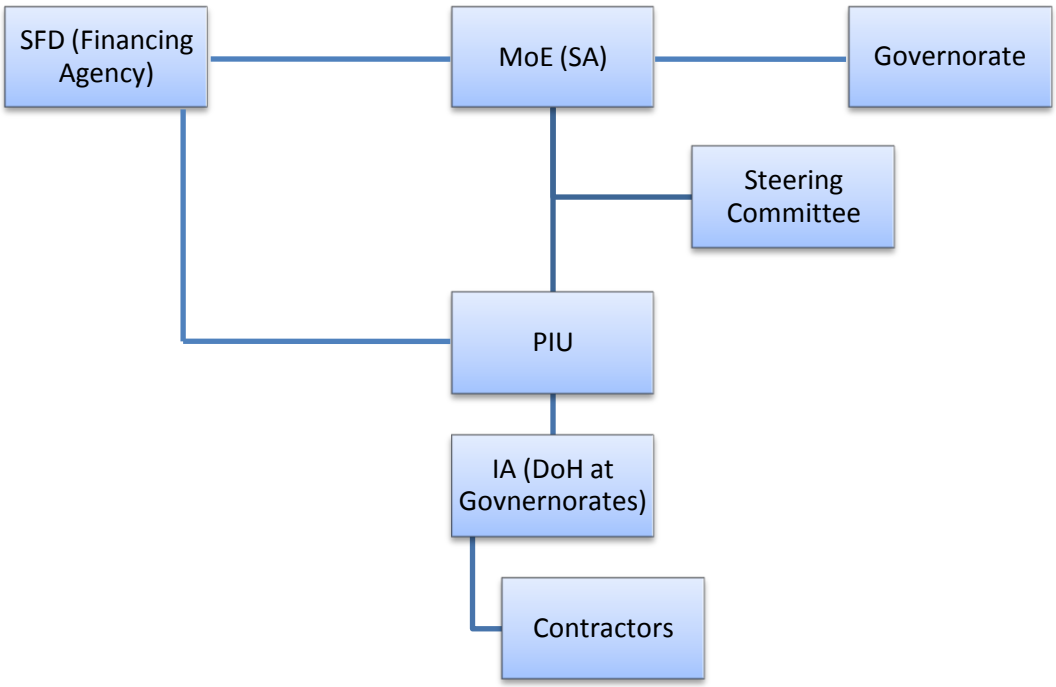
Table 1: Governorates where School Rehabilitation sub-projects will be implemented

Menofia		Beheira		Sharkia		Dakahlia		Kafr El Sheikh	
No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)
21	11,785	49	23,235	75	27,255	64	36,170	45	25,125
Damietta		Matrouh		Cairo		Beni Suef		Menya	
No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)
20	11,110	17	4,930	9	5,480	31	10,270	36	13,880
Asiut		Sohag		Qena		North Sinai		South Sinai	
No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)	No. of schools	Cost (1,000 L.E)
29	12,945	23	8,125	41	19,970	15	4,510	10	4,775

Total	
No. of schools	**Cost (1,000 L.E)**
485	**219,565**

The SA for these sub-projects is MoE and the IAs are the DoH at 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

Schools Rehabilitation sub-projects are expected to yield many environmental benefits. In addition to achieving the objective of the project of improving the facilities for the educational process which shall improve the efficiency and quality of education, 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 as schools through repairing and replacing damaged sanitary ware, installing new plumbing works and improving water supply
- Minimizing sliding hazards through repairing/replacing damaged floors, pavements and stairs
- Improving illumination, ventilation and reducing heat stress in classrooms

On the other hand, the sub-projects could cause limited negative impacts mainly related to managing construction chemical 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, school children 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.

Another important issue could be related to replacing any asbestos items such as ceilings or pipes. The existence of asbestos items in the 485 schools that will be rehabilitated under the project could not be ascertained or denied at this stage; therefore these Guidelines include certain measures for handling any asbestos waste. It is worth noting that in case of replacing asbestos items the main impact would be at the site where these items would be disposed, especially if asbestos surfaces were adequately wetted before removal.

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 the summer vacation at schools or according to an appropriate relocation plan for students in alternative classes that will be rehabilitated during the academic year, this will prevent the exposure of school children to such impacts and, hence, will make such impacts insignificant.

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

- The work in schools should only be started after the end of the educational year so that school children would not be exposed to painting chemicals, dust, and noise impacts. The IAs should make sure that contractors will not start to mobilize to schools except during the summer vacation or according to an appropriate relocation plan for students in alternative classes that will be rehabilitated during the academic year.
- 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 school children 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 out of the school, either for recycling or to an authorized disposal site, at least at the end of a working week.
- Any asbestos item that shall be removed should be well sprayed with water before removal, should be contained in a tight plastic cover and should be transferred to a hazardous waste landfill, such as the landfill in Nasserya/Alexandria Governorate. The contractor will be responsible for delivering the waste to the landfill which should sign the shipment manifest as evidence of delivery.
- 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 from the school; in such cases the contractor should spray water to suppress dust generation.
- The Intermediate Agencies (DoH 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 site supervision at the end of the contractors work at each school to make sure that no accumulated waste are left behind, 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, the management of schools under rehabilitation should be advised by official letters from the DoHs to report any complaints from neighbors regarding the environmental performance of the contractor.

The IA will be required to comply with the requirements of the Egyptian Environmental Affairs Agency (EEAA) regarding preparation of EIA. EEAA has issued updated Guidelines for the rules and procedures of undertaking EIAs, in which projects are classified to 3 classes of EIAs according to their expected impacts on the environment, which are Class A, B, and C ascending respectively from lower to higher impacts on the environment[1]. The Guidelines gave some examples of the required class of EIA and among these examples the Guidelines classify "Basic Education Schools" as a Form A project, while "surface cleaning of small canals" is not among the examples. The Guidelines indicate that projects that are not among the given examples should be classified according to the consumption of resources, the type of project and the expected change on land use, type of inputs/outputs and extent of corresponding environmental impacts and the geographic extent of the impacts. Because of the limited scale of works expected in the Schools Rehabilitation sub-projects, and the fact that these sub-projects are maintenance procedures to existing schools the

[1] Class A is equivalent to Category C in the WB screening of projects according to OP.4.01, Class B is equivalent to Category B and Class C is equivalent to Category A

classification of such projects could be Class A (at the maximum) or even there is a possibility that no EIA Form would be required. The SA (MoE) will be required to check this with EEAA during an early stage of the project and receives an official letter from EEAA advising on the proper class of these sub-projects[2]. In case that a Form A would be required, the IAs should prepare and submit Form A EIAs timely to EEAA and follow-up their feedback.

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. Reviewing a sample of the estimated budget for sub-projects, indoor painting forms about 10% of the total cost, therefore the extra cost expected in contractors' offers is not expected to be major. Another item that may entail extra costs is the management of asbestos waste, which is expected to have minor effect on the total price as no removal/rehabilitation of major asbestos components, if any, is expected to be among the sub-projects activities.

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 progress reports should also include indication to any correspondence with EEAA to be prepared by the SA, such correspondence should be annexed to the report. 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.

[2] The Guidelines require project proponents to consult with EEAA for classifying projects that are not among the given examples so as to ensure proper classification, the Guidelines indicate that EEAA should respond in writing to such consultation request

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
School children exposed to paints' VOCs, noise and dust	Rehabilitation works should only be executed during the summer vacation or according to an appropriate relocation plan for students in alternative classes that will be rehabilitated during the academic year	The contractor	IAs and Schools Management	- Including this condition in the contract with the contractor (see Annex 1) - Schools management not to allow contractors mobilization before the summer vacation or according to an appropriate relocation plan for students in alternative classes that will be rehabilitated during the academic year - Visual inspection to make sure that all works are be finished and all equipment and personnel should be mobilized out of the site at least one week before the following educational year starts
Indoor air quality affected from chemicals in paints	Used paints should be water-based in containers of a recognized manufacturer	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 and Schools Management	- Including this condition in the contract with the contractor (see Annex 1) - Visual observation of any accumulated waste in the school at the end of a working week, - Recording complaints from neighbors about unauthorized disposal in a complaints log

Issue	Required actions	Responsibility of implementation	Responsibility of supervision/ monitoring	Means of supervision/monitoring
Risks of handling asbestos waste	Asbestos items should be sprayed with water before removal, contained in a tight plastic cover during transportation and disposed in a hazardous waste landfill	The contractor	IAs and Schools Management	- Asbestos items should be identified before the tendering procedure and management procedures included in the tender document (see Annex 1) - Visual inspection of asbestos removal procedure - Review signed waste manifest from the disposal site
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 and Schools Management	- Including this condition in the contract with the contractor (see Annex 1) - Recording complaints from neighbors in a complaints log
Ensuring compliance with EEAA Guidelines	Request advise from EEAA on the required EIA Form if any	SA	SFD	- Review process documentation (letter from SA to EEAA and respond of EEAA)
	Timely preparing and following up EIA Form if required	IA	SA and SFD	- Review completed forms and EEAA approvals or conditional approvals

Annex 1: Responsibilities of the Contractor in Implementing Environmental Conditions

The contractor should comply with the following environmental conditions:

- The contractor should comply with the work duration mentioned in this contract, mobilization to and from the site should only be during the duration mentioned in the contract.
- 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 Directorate.
- The contractor should transfer the collected waste out of the school on weekly basis either to be reused or to the ___(specify authorized disposal site name)__ disposal site.
- (To be added in case of removal of asbestos item) The asbestos item ___(state description, i.e. ceiling, pipe … etc.)_____ should be well sprayed with water before removal, contained in a tight plastic cover and transferred to __(specify hazardous waste landfill name)_____ site. The contractor should provide signed manifest from the landfill site recognizing receipt of the waste.
- 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 (MoE) should comply with the following environmental conditions:

- Send an official letter to EEAA requesting the adequate classification of schools rehabilitation sub-project, and whether such sub-projects require the preparation of EIA Form, and what type of form is required. The response of EEAA should be documented in the progress reports.
- In case EEAA advised that Schools Rehabilitation sub-projects will require an EIA from a specific Form, this information should be circulated to Intermediate Agencies (DoHs at concerned Governorates).
- Supervise the timely implementation of Intermediate Agencies of their environmental conditions and the periodic reporting on environmental measures with progress reports

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

- Preparation of the adequate EIA form for projects, if required, submit them to the designated EEAA administration and follow-up the feedback of EEAA. Correspondence with EEAA should be annexed to the next progress report prepared for the project.
- 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.
- Ensure that the contractor has cleared the collected wastes through visual inspection at the end of his task at a certain school. This should be a prerequisite for finalizing the contractor's payment.
- In case a certain sub-project includes removal of an asbestos object, the IA should communicate with the correspondent EEAA Branch asking for advise about the nearest authorized hazardous waste landfill. The name of this landfill should be included in the contractor's contract for this particular sub-project and the contractor should submit signed manifest proving delivering the waste to the designated landfill. Correspondence with EEAA and waste manifests should be annexed to the next progress report prepared for the project.
- Advise management of schools that will be rehabilitated to 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 / Markaz	School Name	Working duration		Violation	Action Taken
			Start date	End date		
1						
2						
3						
4						
5						
6						
7						
8						