

Emergency Employment Investment Project (EEIP)



Environmental Safeguards Guidelines for Canal Cleaning and Weeds Reduction Sub-Projects

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List of Acronyms

EEAA	Egyptian Environmental Affairs Agency
EIA	Environmental Impact Assessment
EEIP	Emergency Employment Investment Project
EMP	Environmental Management Plan
ESSAF	Environmental and Social Screening and Assessment Framework
EU	European Union
GoE	Government of Egypt
IAs	Intermediate Agencies
MWRI	Ministry of Water Resources and Irrigation
PIU	Project Implementaion Unit
SA	Sponsoring Agencies
SFD	Social Fund for Development
WB	The World Bank

1. Introduction

The Emergency Employment Investment Project (EEIP) was signed between the EU and the GoE on July 2013 and the administrative agreement was signed between the EU and the World Bank on December 2013, the project is funded by the EU and 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 EEIP 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 EEIP. 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 Canal Cleaning and Weeds Reduction 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

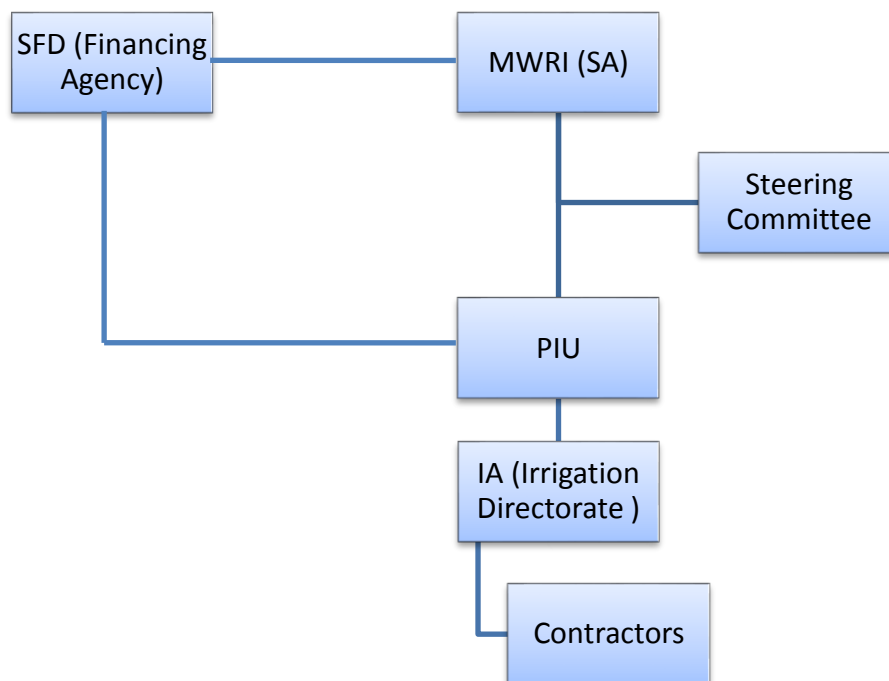
The Canal Cleaning and Weeds Reduction component of the EEIP comprises manual removal of floating plants and other wastes from surface of small canals (with bed width of a maximum of 2 meters). These types of sub-projects are carried out by the Ministry of Water Resources and

Irrigation (MWRI) on routine basis mainly for ensuring sufficient discharge of water to the downstream reaches of canals. MWRI prepares an annual plan for canal surface cleaning, the plan is demand driven and priority reaches are defined according to accumulation of floating plants and wastes on the canal surface. Irrigation Engineering Offices in different parts of the country report the needs for canal surface cleaning, and also the Ministry offers a hotline for receiving complaints about low water discharge due to obstruction by weeds floating waste.

For small canals that are included in the EEIP surface cleaning is only carried out manually, where the workers stand on the canal banks, or on a bridge intersecting the canal, collect the floating plants and wastes and place them on the canal bank¹. According to MWRI the workers do not need to get into the canals, they rather use long shovels, forks and blades. The collected items usually include water hyacinth and floating litter (plastic bags and light waste). There are no certain standard actions by the MWRI contractors for handling the canals surface cleaning waste, in some cases the waste is being left to dry on the canal banks and in other cases dry waste is being burnt to clear the area.

Canal Cleaning and Weeds Reduction sub-projects will be determined at a later stage.

Figure 1: Organizational chart for the sub-project implementation



¹ Annex 1 includes some demonstration pictures of the manual weeding process

3. Environmental Conditions and Guidelines

Canal Cleaning and Weeds Reduction sub-projects are expected to yield many environmental benefits. In addition to achieving the objective of the project of maintaining the design flow of the canals, which is associated with many indirect benefits such as maintaining productivity of downstream agriculture lands and preventing unplanned groundwater abstraction for substituting the low supply, the sub-projects will also achieve direct environmental benefits such as:

- Improving sunlight penetration through the water column and therefore provide native bed flora better opportunity to self purify the stream and supply dissolved oxygen to the water column
- Removing the weeds and wasted litter will reduce the area of vectors breeding which will be associated with public health benefits
- Removing the weeds and wasted litter will also improve the aesthetic value of the area

On the other hands, the sub-projects could cause limited negative impacts mainly related to managing the waste. These negative impacts will only be materialized if the waste is left on the canal banks, burnt in place for clearing the area, or disposed in an unauthorized location. There might be an issue at the disposal site, where the weeds/waste will be disposed, regarding increasing the moisture content of the waste at the site due to tipping the wet weeds/waste over existing waste, however, this could be considered as a minor issue because generally leachate is not a common problem in disposal sites in Egypt due to the high evaporation rates and the amount of weeds/waste will be minor or negligible compared to accumulated waste at the site. Also if the weed/waste remained at the canal bank for few hours during summer, and for few days during winter, most of the moisture will be evaporated.

It is worth noting that impacting the land use next to the canals is not expected, as the temporary accumulation of weeds/wastes will be in the right of way of the canals. Also safety issues could be regarded as insignificant because the workers will not need to get into the canal, therefore no risk of being infected with schistosomiasis, also it is not likely that the floating waste will include any hazardous items.

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

- The contractor should remove the collected weeds/waste from the canal banks to a suitable truck which should tip the waste in an authorized disposal site by the local authority². At the minimum; the contractor should clear the canal banks before moving to another reach of the

² The recycling or composting value of such waste could not be ensured during the preparation of these Guidelines; therefore disposal at an authorized site has been the minimum requirement for handling the waste. However, if the waste could be feasibly composted or used for any other application this will definitely be a better option and should be encouraged by the implementing agency.

canal and should not necessarily transfer the weeds/waste to the disposal site at the end of business day, this will help reducing the moisture content of the weeds/waste from one hand and be logistically easier to the contractor from the other hand. The waste will be at the contractor's custody until he tips it at the disposal site, therefore no waste burning should take place at the site, and if the contractor has doubts that the weeds/waste may be subject to self-ignition or intended ignition from anybody he should transfer the waste to the disposal site in timely manner to prevent such incident.

- The Intermediate Agency (Directorates of Irrigation in correspondent Governorate) should make sure that the contractor abide to the above conditions through including them to the contract (see Annex 2), conducting site supervision at the end of the contractors work at a certain reach to make sure that no accumulated weeds/waste are left behind, conducting occasional site supervision during the process to make sure that no burning ash is left at the site, and conducting occasional site visits to the disposal site to make sure that the waste has been actually disposed in the designated place. The IA should also prepare a complaint log that will record any received complaints by neighbors from smoke or un-authorized disposal of the waste.

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 environment³. The Guidelines gave some examples of the required class of EIA and among these examples the Guidelines classify “cleaning of main watercourses” as a Form B 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 Canal Cleaning and Weeds Reduction sub-projects, and the fact that these sub-projects could be regarded as maintenance procedures to existing projects (canals) the 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 (MWRI) 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-projects⁴. 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.

³ 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

⁴ 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

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, except for the transfer of weeds/waste to the disposal site which is expected to increase the contractor's price for the work as this was not a common duty for the contractors. From the experience of other similar projects supervised by the SFD a manual weeding contractor would clear 200-300 meters of canal length per day, accordingly if a contractor will transfer the weeds/waste to the disposal site at the end of a working week the weeds/waste of about 1.5 km will be transferred collectively using one truck.

The reporting of environmental measures carried out will be along with the regular progress reports prepared for the project according 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 4. 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.

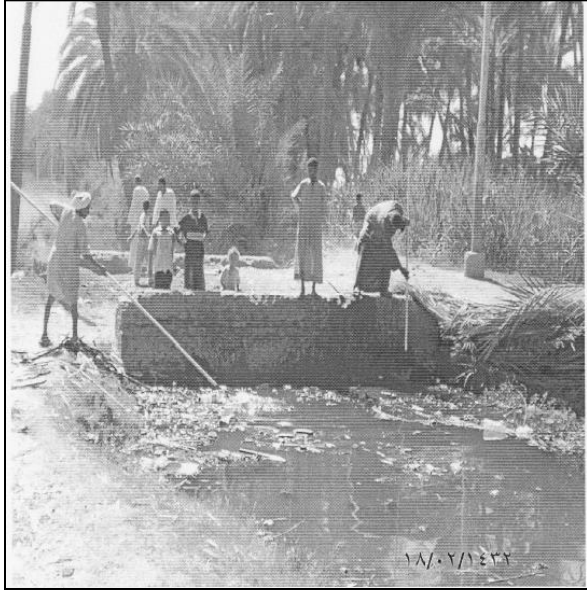
A final report must be presented to the SFD by the SA before the end of the project termination date, to include all environmental data pertaining to the project including social and environmental impacts experienced during the project implementation.

Table below summarized the roles and responsibilities of different project stakeholders for implementing and supervising the above conditions. Also Annex 2 summarizes the environmental responsibility of the contractor in a form that could be annexed to contractor contracts, while Annex 3 summarizes the responsibilities of the SA and IA so that this list could be annexed to the SFD Framework Agreement with the SA.

Table 1: 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
Waste management of collected weeds/waste	Collected weeds should be transferred to an authorized disposal site	The contractor	IAs	<ul style="list-style-type: none"> - Including this condition in the contract with the contractor (see Annex 2), - visual observation of any accumulated weeds/waste or ash at the end of work at the reach, - occasional visits to the disposal site to observe the tipping point and - maintaining a complaint log from waste accumulation and/or smoke from such accumulations
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

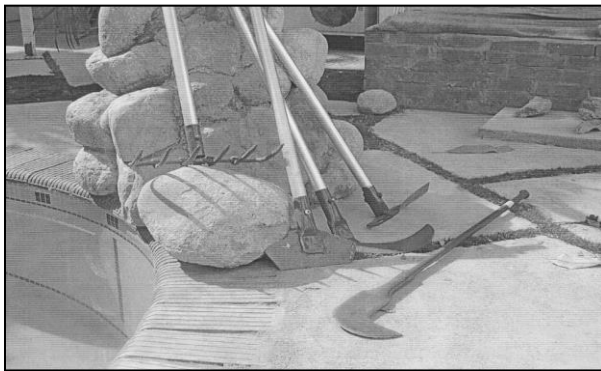
Annex 1: Photos Illustrating the Manual Weeding



Manual cleaning and weeds reduction of one of the canals



The canal, on the right, after cleaning



Examples of manual tools

Annex 2: Responsibilities of the Contractor in Implementing Environmental Conditions

The contractor should comply with the following environmental conditions:

- Collected weeds and wastes from canal's surface should be transferred to ____ (to be filled according to location) _____ disposal site which is approved by the local authority.
- The contractor should transfer the collected weeds and waste to the _____ disposal site on weekly basis at ____ (specify reach or location name) ____ in ____ (specify canal name) ____ Canal. At the minimum the contractor should transfer the collected weeds and waste to the _____ disposal site at the end of his contract at ____ (specify reach or location name) ____ in ____ (specify canal name) ____ Canal.
- During the contractors work at _____ in _____ Canal the collected weeds and wastes will be at the contractor's custody and responsibility. No burning or unauthorized disposal for such weeds and wastes are allowed.
- 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 3: Responsibilities of the SA and IAs

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

- Send an official letter to EEAA requesting the adequate classification of Canal Cleaning and Weeds Reduction 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 Canal Cleaning and Weeds Reduction sub-projects will require an EIA from a specific Form, this information should be circulated to Intermediate Agencies (Directorates of Irrigation 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 (Directorates of Irrigation 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.
- 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 weeds and wastes from the canal banks through visual inspection at the end of his task at a certain canal reach. This should be a prerequisite for finalizing the contractor's payment.
- Conduct occasional visits, for some selected contractors, to the disposal site to ensure that the weeds and waste have been actually disposed there.
- Advise affiliated Engineering Offices in the project areas to prepare complaint's log about the sub-project, this log will include records of any complaints from the local community on burning of collected weeds and wastes or unauthorized disposal. Recorded relevant complaints and measures taken in response to the complaint should be included in the project progress reports.

Annex 4: Standard Reporting Format

Project Code:		Project Name:			Report Date:	
No.	Governorate / Markaz	Canal Name	Canal Reach		Violation	Action Taken
			From (Km)	To (Km)		
1						
2						
3						
4						
5						
6						
7						
8						