

# Micro and Small Enterprises Development for Inclusive Growth Project



**SFD** المنشوق الاجتماعي للتنمية  
Social Fund for Development

## Environmental and Social Management Framework

Final Report

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## List of Acronyms

CEA	Country Environmental Analysis
CSHCD	Central Sector for Human and Community Development
EA	Environmental Assessment
EAFMSE	Enhancing Access to Finance for Micro and Small Enterprises
EEAA	Egyptian Environmental Affairs Agency
ED	Environmental Department
EPP	Environmental Policies Program
ESAF	Environmental and Social Assessment Framework
ESMF	Environmental and Social Management Framework
FI	Financial Intermediaries
HQAFP	Head Quarters Environmental Focal Point
MCS	Microfinance Central Sector
MFI	Micro-Finance Institutions
MSE	Micro and Small Enterprises
MSEA	Ministry of State for Environmental Affairs
MSEDIG	Micro and Small Enterprises Development for Inclusive Growth
PDO	Project Developmental Objective
PIU	Project Implementation Unit
REFPs	Regional Environmental Focal Points
SEDO	Small Enterprise Development Organization
SFD	Social Fund for Development
WB	The World Bank

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# 1 Introduction

## 1.1 Background

The Micro and Small Enterprises Development for Inclusive Growth (MSEDIG) Project is building upon the on-going Enhancing Access to Finance for Micro and Small Enterprises (EAFMSE) Project which was launched in 2010 and is being implemented by the Social Fund for Development (SFD) with support from the World Bank. Through the EAFMSE Project's line of credit (US\$ 300 millions) the project aimed at improving enterprises access to finance, with the objective of creating employment and entrepreneurship opportunities for MSEs. Through gender mainstreaming, the project has also promoted women's economic empowerment, and improved the quality of life of their families and children. Moreover, it has played an instrumental role in helping to narrow geographic disparities by targeting poor rural villages that were previously underserved. All this has ultimately led to poverty reduction, and improvement in the standard of living of those who were adversely affected by the deteriorating economy and contributed to shared prosperity in Egypt at critical times of transition.

The project has made significant progress in meeting its Project Developmental Objective (PDO) of contributing to a sustainable improvement in inclusive (region and gender) access to finance for MSEs on a commercial basis, which has led to job creation, poverty reduction, and overall shared economic growth. Since its first disbursement in April 2011, the operation has had a strong impact on the ground and has had an impressive outreach to underserved governorates and marginalized groups such as youth and women. Under the line of credit, a total of 77,818 loans have been disbursed to micro and small enterprises leading to the creation of over 111,000 job opportunities in critical times of transition. More importantly, youth, a severely underserved segment suffering from disproportionately high unemployment rates, have been effectively targeted with beneficiaries between the age of 21 to 35 representing 60 percent of all microfinance lending during the period of January 2011 and June 2013. This indicates facilitated access to finance for 41,000 young micro entrepreneurs in critical times in Egypt. Furthermore, through the line of credit, SFD has played a key role in encouraging the start-up of new enterprises which represent 39 percent of funded projects under the small enterprise financing component.

Regional disparities were effectively addressed with approximately 40 percent of the value of disbursed micro loans and 30 percent of small loans serving underserved governorates such as Marsa Matrouh, Kafr El Sheikh, Menoufiya, and Beheria as well as marginalized governorates in Upper Egypt including Menia, Sohag, Fayoum and Beni Suef with a focus on the poorest villages.

The project has been widely recognized for its gender mainstreaming feature – one of the key cross-cutting themes in the strategy of the World Bank's MENA region. The strong impact the operation

has had on gender mainstreaming is evident in the increase in the number of female-owned MSEs from 4,573 to 20,536 from June 2012 to June 2013, representing 25 percent of financed projects. The total amount disbursed from the Bank to SFD is US\$ 240 million, accounting for 80 percent of the total loan amount, representing more than 144 percent of the total amount that was scheduled to be disbursed before the end of fiscal year 2013.

The MSEDIG Project is providing an additional US \$ 300 million to continue and build on the achievements of the EAFMSE Project and will be also implemented by the SFD, the apex institution, and mandated by Law 141 of 2004 as well as Prime Ministerial Decree 318 of 2013, to lead and coordinate the MSE development sector in Egypt.

An Environmental Management Plan (EMP) has been prepared for the EAFMSE Project in 2010, and this EMP included measures to be adopted by the implementing agency to ensure the compliance with environmental screening and assessment procedures according to the Egyptian environmental legislation and the World Bank Safeguard Policies. This Environmental and Social Management Framework (ESMF) has been prepared following the measures of the EMP of the EAFMSE project, building on its achievements and recommending measures to overcome the confronted obstacles. The EMP of the EAFMSE Project has been re-disclosed alongside this ESMF in order to provide a complete overview of the environmental and social measures identified for both projects.

## **1.2 Objectives of the ESMF**

The main objective of the Environmental and Social Management Framework (ESMF) is to provide general policies, guidelines, and procedures to be integrated into the implementation of the MSEDIG Project. This Framework has been developed to identify the environmental and social requirements needed to ensure that all sub-projects are in compliance with the national environmental protection laws, regulations and guidelines in Egypt, and the World Bank's safeguards policies. The ESMF provides guidance which will ascertain that environmental and social issues are being addressed effectively for the successful appraisal, design, and implementation of the sub-projects. The framework approach has been adopted because the exact sub-projects that will be implemented through the MSEDIG Project will not be defined during the appraisal phase, accordingly a framework of procedures to be adopted by different stakeholders during the implementation phase is defined, so that adequate environmental screening, assessment, management and monitoring procedures are followed.

## 2 Legislative Framework

### 2.1 Egyptian Legislation

Environmental Law No.4/1994, as amended by Law No.9/2009, and its Executive Regulation are the main legislation governing environmental protection in Egypt. The Environmental Law stipulates that an Environmental Impact Assessment (EIA) should be prepared for projects, which are associated with potential environmental impacts, as a precondition for obtaining a license. The entity responsible for the enforcement of the Environmental Law is the Ministry of State for Environmental Affairs (MSEA) through the Egyptian Environmental Affairs Agency (EEAA)

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, these Classes are A, B, and C ascending respectively from lower to higher impacts on the environment<sup>1</sup>. The Guidelines gave examples of the required class of EIA for different projects, these examples are illustrative and not exhaustive, and 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 the geographic extent of corresponding environmental impacts. It is worth noting that the Guidelines indicate that projects located in sensitive areas (such as natural protectorates, archeological areas, areas next to shorelines or Nile Banks ... etc.) should be upgraded one level in its EIA classification.

In addition to the three EIA Classes the Guidelines include a list of relatively small scale projects that do not require an EIA, these projects just require to fulfill special environmental conditions identified for each type of project. Many of the MSEDIG sub-projects would be under this category of projects.

Further to Law 4/1994, there may be other specialized laws that govern the environmental and social performance of some projects according to the type, location and activities of the project. Examples for such laws include:

- Law 93/1962 and Decree 44/2000 for projects that discharge wastewater to a sewerage network. The Law specifies the licensing procedures that should be followed for connecting different establishments to the sewers. The law also enforces establishments that discharge high loads of solids or oils to install solids/oil separation units before their effluents enter the sewerage network, there are certain standards for wastewater parameters that should be met for accepting the wastewater discharge to the sewerage system.

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<sup>1</sup> 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, as shall be further explained

- Law 38/1967 for General Cleanliness, and other local Decrees in Governorates that governs solid waste management issues. The Law stipulates that it is not allowed for households, institutional entities and owners of businesses to dispose of garbage or cesspits sewage except in locations identified by the local authority and according to their guidelines. Local Authority Decrees in different areas usually regulate the waste collection procedures within their domains.
- Law 12/2003 which is the Labor Law. The law includes certain stipulations and standards for the working environment and the welfare of labor. The Law includes detailed safeguards for the chemical, physical, mechanical and biological safety of the working environment specific to different sectors and the requirements for fire safety and emergency plans. The Law also includes inspection procedures that are followed for ensuring the implementation of the Law standards
- Local Decrees in Governorates that organize landuse issues, which usually identify the locations of industrial zones, workshops and commercial activities.
- Engineering Codes of Practice, which include a number of specialized Codes issued by the Ministry of Housing and Urban Development. A number of these Codes includes engineering guidelines related to environmental issues, such as sanitary fixtures for different establishments, energy conservation measures and fire protection measures.

## 2.2 World Bank Safeguard Policies

The World Bank (WB) has identified 10 environmental and social safeguard policies that should be taken into consideration in its financed projects. The objective of these policies is to prevent and mitigate undue harm to people and their environment during the development process. Table 2-1 lists these 10 safeguard policies along with their relevance to the MSEDIG project.

**Table 2-1: WB Safeguard Policies and their relevance to the MSEDIG project**

Policy	Policy objective	Policy triggering	Justification
Environmental Assessment	Improve decision making, to ensure that project options under consideration are sound and sustainable, and that potentially affected people have been properly consulted	Triggered	Project meets the policy criteria



<b>Policy</b>	<b>Policy objective</b>	<b>Policy triggering</b>	<b>Justification</b>
Natural Habitats	Conservation of biodiversity, as well as the numerous environmental services and products which natural habitats provide to human society	Not triggered	No sub-projects will be implemented in protected areas
Forests	Reduce deforestation, enhance the environmental contribution of forested areas, promote afforestation, reduce poverty, and encourage economic development	Not triggered	No forests are located in the project area
Pest Management	Reduces reliance on synthetic chemical pesticides, introduce control methods to its application and promote the use of biological pesticides	Not triggered	No considerable pest application among project activities
Physical Cultural Resources	Avoid, or mitigate, adverse impacts on cultural resources from development projects that the World Bank finances	Not triggered	Sub-projects unlikely to impact such resources
Involuntary Resettlement	Avoid involuntary resettlement to the extent feasible, or to minimize and mitigate its adverse social and economic impacts	Not triggered	No involuntary resettlement for sub-projects as a pre-condition
Indigenous People	Identify indigenous peoples, consult with them, ensure that they participate in, and benefit from Bank-funded operations in a culturally appropriate way - and that adverse impacts on them are avoided, or where not feasible, minimized or mitigated	Not triggered	No indigenous people exists in the project area
Safety of Dams	Ensure safe operation of dams which has significant social, economic, and environmental relevance	Not triggered	Not relevant to project activities
International Waterways	Avoid affecting the relations between the World Bank and its borrowers, and between riparian states	Not triggered	Not relevant to project activities

Policy	Policy objective	Policy triggering	Justification
Dispute Areas	Avoid affecting the relations between the Bank and its borrowers, and between the claimants to the disputed area	Not triggered	Not relevant to project activities

According to Operational Policy (OP 4.01) for Environmental Assessment, borrowers should carry out an Environmental Assessment (EA) from a category that corresponds with the scale, nature and extent of the potential environmental and social impacts. According to these factors, OP 4.01 classifies projects into 4 categories, in which the first three categories are similar to EEAA classification system (but in contrary with EEAA system Category A is likely to cause maximum impacts and C are associated with the least impacts<sup>2</sup>), while the forth category is the Financial Intermediary (FI) Category which involves investment of Bank funds through a financial intermediary, in subprojects that may result in adverse environmental impacts. The MSEDIG project is considered as an FI Category as part of the finance, involving small enterprises, will be channeled through intermediate banks.

In appraising FI projects, the Bank reviews the adequacy of country environmental requirements relevant to the project and the proposed EA arrangements for subprojects, including the mechanisms and responsibilities for environmental screening and review of EA results. When necessary, the Bank ensures that the project includes components to strengthen such EA arrangements, and if the Bank is not satisfied that adequate capacity, among the implementing institution, exists for carrying out EA, all Category A subprojects and, as appropriate, Category B subprojects-including any EA reports-are subject to prior review and approval by the Bank. It is worth noting that none of the sub-projects are expected to be classified as Category A, according to the Environmental Assessment Policy OP-4.01, and there will be a pre-condition that sub-projects should be either of Category B or C.

## 2.3 Comparative Assessment of National Legal Framework and WB Requirements

The Law for the Environment has been issued in Egypt in the year 1994, since then significant improvements have been introduced to the environmental legal system following the gained experience through implementing the law in the past 19 years. Many amendments have been introduced to the law in addition to Guidelines, including EIA Guidelines, as indicated earlier.

The Country Environmental Analysis (CEA) report for Egypt, issued by the WB in 2005, indicates that, historically, the enforcement of environmental laws in Egypt was not very successful mainly

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<sup>2</sup> It is worth noting that Category C projects, according to the WB classification do not require further environmental assessment beyond the screening process

due to fragmentation among regulatory institutions, licensing agencies, police authorities . . . etc. The CEA further clarifies that since 2003, there have been substantial efforts to improve this situation as “Major institutional and organizational reforms have taken place within the Environment and Surface Water Police of the Ministry of Interior. The general directorate for environmental inspections in EEAA was further strengthened. Periodic monitoring and inspections are made by this directorate, especially for controlling air emissions and waste water discharges. Furthermore, the preparation of environmental registers and compliance action plans has increased as a result of the continued monitoring of the various commercial and industrial establishments”.

For the EIA system, the CEA indicates that the features of the Egyptian EIA system are generally compatible with the corresponding features of World Bank Operational Policies (OP 4.01), but with few gaps regarding the preparation and follow up of the environment management plans, the consultation, disclosure and dissemination of the EIA reports, however, the CEA mentioned that Since 2004, there have been serious efforts by EEAA to improve the EIA information dissemination through the design of an EIA database. After 2005, when the CEA was issued, there have been significant improvements in the EIA systems that have, to a great extent, bridged those gaps. Importance of public participation and information dissemination was practically demonstrated in the year 2008, both among investors and regulating authorities, after a public opposition has resulted in changing plans for establishing a major fertilizer plant in an area with high tourist value in Damietta Governorate. The requirements for consultation and dissemination of EIA reports have been officially added to the EIA requirements in the new Guidelines issued by EEAA in 2010, these Guidelines have been made with support from the WB and in compliance with its general requirements<sup>3</sup>. The social aspects have been also integrated in the new Guidelines, the definition of EIA according to the Guidelines reads: “*EIA process is the systematic examination of consequences of a proposed project, aiming to prevent, reduce or mitigate negative impacts on the environment, natural resources, health and social elements as well as capitalize on positive impacts of the project*”, the social aspects are integrated in the Guidelines through the EIA screening process, description of baseline conditions, assessment of impacts, analysis of alternatives and preparation of management plans.

The project screening system according to the new EIA Guidelines is compatible to a great extent with the classification system of OP 4.01. A comparison between the two screening systems is indicated in Table 2-2 below.

**Table 2-2: Comparison of EA screening process according to EEAA Guidelines and OP 4.01**

Classification	EEAA Guidelines	OP 4.01
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<sup>3</sup> In the preface of the Guidelines the Minister of State for Environmental Affairs mentioned in his speech that “In cooperation with the World Bank and with the support of the Environmental Sector Program, the Ministry has also reviewed the EIA system and undertaken the needed modifications in order to be compatible with the systems adopted in numerous developed countries and World Bank system adopted in projects financing”

Classification	EEAA Guidelines	OP 4.01
Highest severity class	<p>Meets one of the following issues:</p> <ul style="list-style-type: none"> <li>-Extended geographical extent and effect</li> <li>-High consumption of resources</li> <li>-Causing a permanent and radical change in predominant landuse and development trends,</li> <li>-Numerous environmental, health and social aspects in the construction and operational phases with high magnitudes</li> <li>-Use or production or handling of hazardous substances or handling or generation of hazardous waste in any of its forms (solid, liquid and gaseous) as an integral aspect of the activity</li> <li>-Generation of high loads of non-hazardous liquid, gaseous or solid wastes/pollutants, implied by the nature of the activities</li> </ul>	<p>Meets one of the following issues:</p> <ul style="list-style-type: none"> <li>- Affected area broader than the sites or facilities subject to physical works</li> <li>- Sensitive environmental irreversible impacts, which raise issues covered by <u>OP 4.04, Natural Habitats</u>; <u>OP/BP 4.10, Indigenous Peoples</u>; <u>OP/BP 4.11, Physical Cultural Resources</u> or <u>OP 4.12, Involuntary Resettlement</u></li> <li>- Diverse impacts</li> <li>- Unprecedented impacts</li> </ul>
Category B or Form B	<p>Does not meet any of the above issues and meets one of the following issues:</p> <ul style="list-style-type: none"> <li>-Medium consumption of resources</li> <li>-Causing a permanent but confined change in predominant landuse and development trends,</li> <li>-Use, production or handling of hazardous substances or handling or generation of hazardous waste in any of its forms (solid, liquid and gaseous) as a secondary aspect of the activity</li> <li>-Generation of medium loads of non-hazardous liquid, gaseous or solid wastes/pollutants, implied by the nature of the activities</li> </ul>	<p>Generally impacts are less than the higher category. The impacts should not meet one of the above issues and should be:</p> <ul style="list-style-type: none"> <li>- Site specific</li> <li>- Reversible</li> <li>- few</li> </ul>
Lowest severity class	Does not meet any of the above issues.	have minimal or no adverse environmental impacts

The above Table illustrates that there are many similarities between the two systems, however, the final judgment on the screening of a specific project will be subjective in cases where the threshold between “high” and “medium” could not be quantitatively defined. Despite of this subjective screening evaluation the possibilities that a sub-project could be classified by EEAA in a less severe class than OP 4.01 are very limited especially that projects in sensitive areas are upgraded to the

higher class as mentioned earlier. This possibility could be almost negligible in case of classification of the highest severity projects<sup>4</sup>, as the MSEDIG sub-projects do not trigger any safeguard policies other than OP 4.01, furthermore the scale of investment for each sub project it is not likely to allow for sever impacts that could raise the EA class to Category A, especially if this sub project is included among the examples of medium and lowest severity classes in EEAA Guidelines<sup>5</sup>.

After the classification of sub-projects the EIA preparation procedures are well defined in the Guidelines. The EIA approval is well integrated in the licensing system for new projects, as this approval is a precondition for granting the license by Local Authorities for projects that requires an EIA. Also, satisfying the requirements of other laws, such as Law 93/1962 and Law 12/2003, is well integrated in the licensing procedures, as the approval of concerned bodies, such as the sewerage authority, the labor office and the civil defense, is also a precondition for granting the project license.

In conclusion, it is believed the existing EIA system and licensing procedure according to the 2010 EIA Guidelines generally address OP 4.01 requirements, even though the examples given for projects classification according to the Guidelines may not be identical with the corresponding classification according to OP 4.01 the possibilities for under-classifying a Category A project among the MSEDIG sub-projects are considered negligible. Accordingly, the compliance with the selection criteria of sub-projects that eliminates Form C (or Category A according OP 4.01), the licensing requirements during the appraisal of sub-projects and the follow-up procedures recommended in this ESMP are believed to effectively manage the environmental and social issues related to these sub-projects.

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<sup>4</sup> This is about the possibility of a project being classified as Form B by EEAA, while it should be classified as Category A according to OP 4.01

<sup>5</sup> As mentioned earlier, EEAA includes examples for certain projects that are readily classified

### 3 Description of the Project

The project consists of a line of credit of US\$300 million to the Government of Egypt that will be channeled through the SFD. SFD would then on-lend to Financial Intermediaries (FI) that would ultimately reach the end beneficiaries, namely MSEs. Numerous innovative mechanisms will be tapped on to enhance access to finance. At the borrower level, this will take the form of new financial products for MSEs (financial leasing, venture capital); specific designs that would mitigate the hurdles faced by certain excluded market segments (i.e. women, youth); new delivery channels that would expand outreach in underserved villages (post offices); and addressing unmet demands (Islamic finance). At the institutional level, innovations will be centered around new partnerships between banks, MFIs and the Post to broaden the array of commercial providers in the market. All this will contribute to improving financial intermediation, enhancing access to finance for different segments of the society, which will ultimately contribute to the creation of sustainable private sector jobs.

The project development objective (PDO) is to expand access to finance for MSEs in Egypt, using innovative financing mechanisms, with a special focus on youth and women, as well as underserved regions

There are several higher level project objectives that the successful implementation of the project will directly and indirectly achieve. Through contributing to an improvement in access to finance for MSEs, this project will ultimately expand economic opportunities and job creation. In doing so, the operation will also demonstrate how improved financial intermediation for MSEs can lead to sustainable private sector job creation, development of entrepreneurship capacities and contribute to overall economic growth and poverty reduction. The project will unlock the market for lending to MSEs and improve the access of job-creating enterprises to liquidity and much needed funding. In addition, it will ensure more inclusive economic growth, through expanding access to financial services that will unleash opportunities for a significant segment of youth, women and underprivileged Egyptian entrepreneurs in marginalized areas

The Project will also indirectly: (i) enhance the financial system's capacity to evaluate the effectiveness of its MSE support; (ii) improve incentives for banks to expand into MSE lending; (iii) incentivize and support the design of new financial products (venture capital and financial leasing for MSEs), the provision of Islamic *Shari'a*-compliant products; and (iv) ensure better opportunities for the remote, rural and underprivileged areas to meet citizens' needs and to establish income-generating projects with the objective of achieving sustainable and balanced development.

Project beneficiaries will be: (i) microenterprises, defined as enterprises with paid-in capital of less than LE 50,000 and up to 5 workers<sup>6</sup>; and (ii) small enterprises, defined as enterprises with paid-in capital of between LE 50,001 and LE 1 million, and up to 50 workers.

The project will make funds available to the selected Micro-Finance Institutions (MFIs), NGO's and Banks who in turn will lend the funds to eligible beneficiaries.

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<sup>6</sup> Although microenterprises, by definition, are with paid capital less than L.E.50,000, during the implementation of the EAFMSE project the average capital per microenterprise was L.E. 5000 so as to reach large number of beneficiaries

The SFD has classified the beneficiary facilities to 5 main development sectors as follows:

- Industrial Sector: which includes 10 subsectors, and these subsectors also include about 120 type of enterprise classified according to their activities
- Commercial Sector: which includes 10 subsectors and about 60 type of activities
- Services Sector: which includes 11 subsectors and about 80 type of activities
- Animal Sector: which includes 4 subsectors and 11 type of activities
- Free Employment Sector: which includes 8 subsectors and 8 type of activities

The exact number of sub-projects that will be implemented under the MSEDIG project at each sector is not defined at this stage, and disbursing of funds will be according to a plan that will be set during the implementation phase. However, according to the experience of the EAFMSE project, most of the funds were to beneficiaries in the commercial sector and the industrial sector, in case of small enterprises. Table 2-1 illustrates example from the sub-projects implemented by the EAFMSE during the fiscal year 2012/2013, which indicates the scale of projects in each sector and the scale of finance for the microenterprises and small enterprises.

**Table 3-1: EAFMSE implemented sub-projects under different sectors from 1/7/2012 to 30/6/2013**

Sector	Microenterprises		Small enterprises	
	No. of sub-projects	Total funds (L.E)	No. of sub-projects	Total funds
Industrial	2,167	12,479,672	258	207,603,042
Commercial	34,381	200,057,290	537	156,913,560
Services	7,657	43,057,572	211	49,972,803
Animal	1,008	5,006,900	3	3,600,000
Free employment	1,186	7,162,638	20	9,330,800
Other	896	4,994,500	-	-
<b>Totals</b>	<b>47,295</b>	<b>272,758,572</b>	<b>1,029</b>	<b>427,420,205</b>

Source: Adapted from data obtained from SEDO and Microfinance Central Sector of the SFD

A Project Implementation Unit (PIU) within the SFD will be responsible for implementing the project. SFD will be responsible for ensuring compliance of project activities to the fiduciary and safeguards arrangements for the project. The PIU will supervise the FIs and NGOs and other financial institutions which will disburse the funds to the beneficiaries.



## 4 Environmental and Social Issues

The environmental and social issues associated with the implementation of sub-projects are expected to be relatively minor due to the small scale of the projects.

By definition the project will achieve many socioeconomic benefits as previously indicated in the Project Description, and it is designed to maximize these benefits. Target beneficiaries are based on an impact evaluation which was conducted on April, 2013 to evaluate the impacts of the project on gender empowerment, job creation, and poverty alleviation through enhancing finance for MSEs<sup>7</sup>. The main findings highlight the need for more effective targeting for sectors that create more job opportunities, such as industry which, for example, absorbs four times as much labor as the trade sector. Furthermore, findings show there is a need for some improvement in facilities such as incubators, one-stop-shop, and training, especially on technology. These aspects will be considered during the project implementation.

In addition to the socio-economic benefits, some sub-projects could have positive environmental impacts if the sub-project itself has an environmental objective, such as providing environmentally friendly products and services (i.e. energy saving products, recycled products, waste management services). The ESMF includes certain measures for documenting such benefits, if any, during the project implementation.

Micro and small enterprise have limited-if any-negative impact on the surrounding environment. The small portion of these enterprises that might have potential negative effect include, for example; blending and production of dyes, metal plating, foundries, textiles, brick making, automobile repair shops, and different workshops (carpeting, metal formation ... etc.). It is worth noting that the average finance provided by the EAFMSE project for each microenterprise during the fiscal year 2012/2013, presented in Table 3-1, is about L.E. 5,000 per microenterprise, and accordingly the environmental and social issues associated with such scale of projects could be negligible.

The exact impacts of the sub-projects could not be identified at this stage of the project because the sub-projects are not yet identified, however the typical key impacts associated with these micro and small facilities include:

- Improper disposal of waste
- Handling of chemicals and hazardous substances
- Air emissions resulting from fuel combustion and spraying activities
- Consumption of resources and causing pressure on infrastructure
- Noise and foul odors caused by some facilities

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<sup>7</sup> The analysis relied on more than one methodology to ensure robust results for plausible and applicable policy recommendations to enhance finance to MSEs in Egypt. These methodologies are in-depth interviews with main stakeholders, data analysis of intermediaries (SFD, banks, and NGOs), and surveys covering 370 small and micro enterprises in different governorates depending on the share of these governorates of the loan, and how these governorates can represent other governorates. For example, big governorates, like Cairo and Giza, Upper Egypt governorates, such as Fayioum and Asyut, and Lower Egypt governorates, such as Al-Sharqia, were all included and covered in the sample.

Table 4-1 below illustrates some of the typical environmental issues associated with some sectors of SMEs, these sectors are the main activities funded by SFD that are associated with environmental and social issues. An exhaustive list of the SME sectors according to the SFD classification is given in Annex 2

**Table 4-1: Typical environmental issues associated with some MSEs**

<b>Sector</b>	<b>Typical key environmental issues</b>
Textile industries (including dying)	Release of and exposure to hazardous effluents; use of hazardous products
Refractory industries (including bricks, pottery ... etc.)	Air emissions, top soil erosion; exposure to particulate matters and fumes; release of ashes into waterways, noise
Metallurgical industries	Release of hazardous effluents, air emissions, noise, odors
Automobile and motor repair shops	Inappropriate disposal of used oils, batteries, sludge, other hazardous wastes, noise
Foundries and metal forming workshops	Air pollution from gases, metal fumes, organic solvents and dust; solid wastes, noise, odors
Paper industries and print houses	Hazardous effluents and wastes.
Food processing	Organic wastewater, solid waste, wastes; air emissions, odor
Wood processing	Use of hazardous materials (glues and paints) in production process, noise, solid waste
Agriculture industries and livestock operations	Organic wastewater; solid waste, odors, human exposure to diseases
Chemical industries (including plastics forming, cosmetics, domestic products ... etc.)	Air emissions, hazardous effluents and wastes, handling of hazardous substances
Small-scale transportation	Air pollution from old and poorly maintained vehicles, noise
Leather works	Solid wastes; chemicals handling; hazardous effluents (dyes, chemicals).
Engineering and electric industries (ACs, electronics ... etc.)	Air emissions, solid wastes, noise, industrial effluents

## 5 Management Framework

### 5.1 Mitigation and Monitoring of Negative Impacts

The implementation of environmental and social mitigation measures for minimizing negative impacts will be carried out by the MSEs during the implementation of each sub-project. The Environmental and Social Management Framework (ESMF) is focusing on the screening procedures that should be taken by the SFD during the selection of sub-projects and supervision, monitoring and evaluation of the impacts during project implementation.

The screening process of sub-projects should be carried out according to the requirements of EEAA Guidelines for EIA, which generally addresses the requirements of OP 4.01 as mentioned earlier. The WB will periodically review the EA process carried out by the SFD, through reviewing progress reports and possibly reviewing some EIAs prepared for Form B projects.

The classification of the projects according to EEAA Guidelines will be to 4 classes: Form B projects, Form A projects (equivalent to Category C according to WB OP 4.01 classification), Special Conditions projects and projects that do not require specific environmental safeguard measures. It is worth noting that Form C projects are not eligible to be among the sub-projects, therefore, the screening criteria includes elimination of Form C projects, as well as any project that will be associated with certain sensitivity or severe impacts, from the selection process of sub-projects.

As mentioned earlier, the SFD has classified types of enterprises to 5 main sectors and other subsectors according to the most common business activities practiced by these enterprises. This classification has been reviewed in order to compare it with EEAA EIA classification for projects and a tentative evaluation of the EIA class for each subsector has been done. This tentative evaluation should be checked by EEAA during the project implementation, it will be required by the SFD to ask EEAA advice about the correct classifications of these subsectors, through official inquiry at an early stage of the project. Annex 1 presents the examples of class C, B, A projects and Special Conditions Projects, as defined in EEAA Guidelines, relevant to MSEs, while Annex 2 presents the SFD sectors and subsectors with the evaluated EIA classification.

According to the tentative classification of subsectors, presented in Annex 2, and the general screening requirements of OP 4.01, it is recommended that some types of sub-projects should be eliminated from the MSEDIG project, including:

- Sub-projects that are classified as Form C. According to Annex 2 this will include:
  - o Sub-projects comprise treatment or refining of edible oils
  - o Textile plants and dye houses with production capacity more than 10 tons/day

- Coal plants that comprise distillation process
  - Plants producing batteries as main product or auxiliary product
  - Plants producing paints, shoe polish, inks and waxes
  - Plants producing soap, detergents, disinfectants, petroleum products, chemical products, pharmaceuticals or fertilizers, in which chemical reactions are included in the production process
  - Ceramics and tiles plants
  - Plants producing glass or mirrors from raw materials
  - Paper and carton plants that include pulping process
  - Leather tanneries
  - Lead foundries
- Sub-projects that are located in natural protectorates, such as the Nile islands, shorelines within 200 meters from high water mark, or Nile Banks. These sub-projects are excluded to ensure that there are no impacts on natural protectorates.
  - Sub-projects that may involve involuntary resettlement or acquisition of new lands out of designated industrial/commercial/farming zones or areas allocated by the Local Authority for the type of activity of the sub-projects.
  - Sub-projects including tobacco production. Although tobacco plants are included in Form B list in EEAA Guidelines, as the associated environmental issues with the production process itself are not usually significant. However, it is believed that the indirect impacts of consuming tobacco are significant on indoor air quality, especially in public places. The consumption of tobacco has well known health impacts among smokers and also nonsmokers, therefore it is recommended to exclude these subprojects from the MS DIG project.

Following the screening process the SFD should make sure that EIA Form preparation, for relevant projects, has been done by the MSEs and the approvals of EEAA have been granted. Disbursement of the funds to the sub-project should be conditional to having the official approval of EEAA for Form A and Form B projects. The mitigation measures identified in these EIA Forms and approved by EEAA should be annexed to the contract made between NGO/MFI and the MSE. For the projects of Special Conditions the SME owner should have a list of the requirements relevant to his sub-project also annexed to the contract. The contracts with these enterprises should also include commitments to SMEs to report on its environmental management plans on quarterly basis; these quarterly reports should include the progress of implementing the mitigation measures included in the EIAs and the conditions of EEAA.

Further to the screening process according to EEAA Guidelines for EIAs, the SFD should identify any sub-projects that are associated with potential environmental benefits for documenting such benefits. The measures that should be taken by MSEs implementing such sub-projects to document such benefits depend on the type of sub-project<sup>8</sup>, these documenting measures should enable the PIU to report on the cumulative environmental benefits of such sub-projects, if any.

Also the social benefits of sub-projects should be reported by the PIU so as to have a measure of the social achievements of sub-projects, such as number of employment opportunities created classified by gender, temporary or permanent, and whether the implementing area was underserved in the past. These indicators will be included anyway in the selection criteria of sub-projects according to the project design; however it will be beneficial to report on these benefits in the periodic environmental and social reports that will be prepared by the SFD.

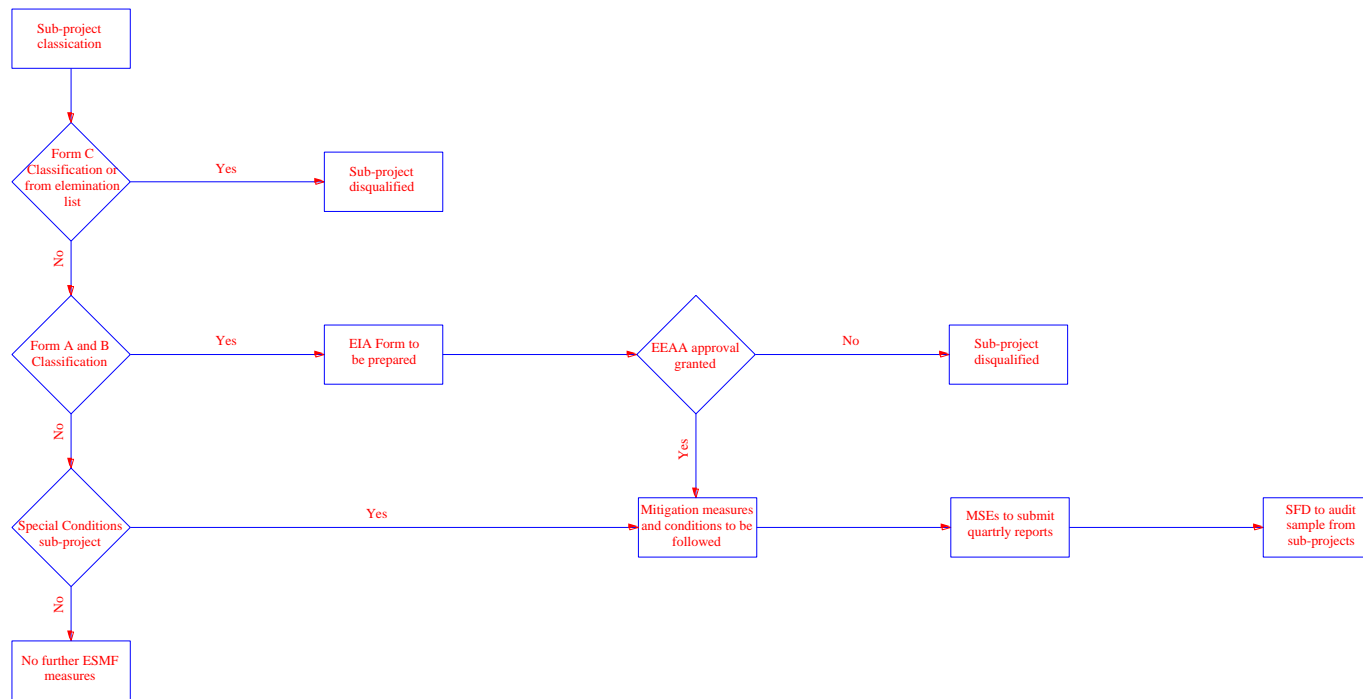
During the implementation of the sub-projects the SFD will follow-up the implementation of the mitigation measures for the Class A and B projects, the special conditions of relevant projects and projects with environmental benefits through following up the reports presented by the SMEs and through auditing to selected samples of facilities.

Figure 5-1 illustrates the main procedures that should be taken in the screening and follow-up of sub-projects, while Annex 3 presents a checklist for sub-projects exclusion according to the above criteria.

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<sup>8</sup> For example sub-projects that work on plastic recycling should document amount of waste processed and amount of recycled plastics produced, sub-projects that are specialized in collecting waste should report on amount of collected waste ... etc.

Figure 5-1 Flow-chart for the main ESMF measures to be taken for sub-projects



## 5.2 Lessons and Experience of EAFMSE EMP Implementation

The environmental program was first established in the SFD in order to respond/comply with a World Bank's request and loan agreement under SFD III. It was firstly established as an Environmental Development Unit (EDU) in November 1998. The Unit evolved several times, were it became successfully the Environmental Development Department (EDD), then the Environmental Policies Program (EPP). After completion SFD III agreement, SFD decided to keep the EPP as part of the institutional structure of SFD. After merging the Planning & Monitoring Group (PMG) with the International Cooperation Group (ICG) in January 2009, the EPP has become a central, crosscutting program operating under the Planning & International Cooperation Group (PICG).

During the past years the EPP was responsible for integrating the environmental assessment process in the sub-project cycle. The EPP was responsible for ensuring that different environmental issues are considered at the preparation and implementation phases of the SFD sub-project cycle through monitoring and evaluating the sub-project's adherence to environmental policies and standards.

The Environmental Management Plan (EMP) prepared for the EAFMSE Project in 2010 indicated that the implementation of the EMP measures was mainly the responsibility of the EPP. The designated measures to be carried out during different phases of the project cycle, according to this EMP, included the following:

- Environmental Screening and Recording of Outcomes: in which the sub-projects are classified according to their potential impacts on the environment. The sub-projects, according to this screening, are classified to Class A, B (according to EEAA classification) or not needing environmental conditions for EEAA approval.
- Environmental Assessment of Sub-projects: in which environmental assessment Forms A or B are prepared as appropriate
- Appraisal and Approval of Sub-projects: This includes the appraisal and approval of the projects according to the results of the environmental assessment step. The approval of EEAA should be secured during this step. The EMP mentioned that Regional Environmental Focal Points (REFPs) with the help of Head Quarters Environmental Focal Point (HQEFP) should make sure that these approvals are granted.
- Implementation and Operation of Sub-projects: During this step the measures identified in the previous steps should be implemented by the project beneficiaries under REFP monitoring and supervision.
- Monitoring, reporting and evaluation of sub-projects: in which REFPs shall monitor sub-projects on periodic basis. REFPs are required to prepare quarterly reports, to include the results of the above tasks, and these quarterly reports should be fed to into a software program that facilitates the follow-up of sub-projects status. The EPP should review these quarterly reports and prepare a collective annual report on the EMP measures to the SFD's Managing Director.

- Training and Capacity Building Programs: Targeting EPP, REFPs and HQEFPs staff under three main themes: environmental strategic planning, annual and baseline reporting and environmental auditing

The implementation of these measures is considered to be sufficient base for the implementation of the MSEDIG Project ESMF, taking into consideration the screening measures indicated earlier. One of the main obstacles that has been encountered during the implementation of the EAFMSE project EMP was the understaffing of the EPP, however, the SFD has decided to improve the integration of environmental assessment to its projects through upgrading the EPP to be the Environmental Department (ED) under the Central Sector for Human and Community Development (CSHCD), this has been issued through a Decree from the SFD Secretary General, in March 2013. This upgrade is expected to be an important step for improving the capacity of the SFD in terms of environmental management; however, providing the ED with adequate resources and staffing is vital for its successful operation.

### 5.3 Institutional Arrangements

The overall project management will be carried out by the SFD through a PIU as mentioned earlier. The SFD will select FI banks and NGOs according to technical and financial criteria to manage disbursement of the funds to the MSEs.

The SFD comprises a number of Central Sectors that manage different operations, there are two designated Central Sectors for MSE: one is the SEDO for the small enterprises and the other is the MCS for microenterprises. The financial auditing of SFD operations is carried out through a Central Sector for auditing, which has the responsibility of auditing the compliance of intermediate bodies (FIs, MFIs and NGOs) and final beneficiaries the funding rules and conditions. The PIU is expected to take direct responsibility for the day-to-day management issues and coordination between different project stakeholders.

The environmental and social management of the project should be mainly through the SFD which is in the top level of the project hierarchy. The roles and responsibilities of the ESMF will be distributed between the three levels of the project management as follows:

- SFD will be responsible for the overall management of the ESMF, and will have direct responsibility in the screening and follow-up process
- At the intermediate level, the FIs, MFIs and NGOs will make sure that the contractual issues related to ESMF, such as ensuring environmental and social conditions are integrated in the contracts, and official papers are satisfied by the beneficiaries. Also the intermediate level entities will be responsible for coordinating the auditing and following-up by SFD to end users
- At the beneficiary level, enterprises will be responsible for the preparation of EIAs from the adequate class, and the implementation of different environmental and social conditions recommended in these EIAs and stipulated by EEAA



The ED, being the cross-cutting department responsible for environmental management, will be the responsible department for the ESMF management. Although the ED has been officially established few months ago, it still needs to recruit sufficient staff to carry out the screening and follow up measures and to achieve the mandate of the ED at large and there have been executive steps taken by the SFD towards this. At the minimum the ED will recruit the HQEFP and REFPs to take over their roles in ESMF. Furthermore there will be a contact person in the NGOs and MFIs that will work with the SFD, this contact person will be responsible for making sure that the mitigation measures/special conditions are annexed to the contracts with the MSEs, and will also coordinate the auditing of sample facilities with the ED.

The tasks that should be taken by the different persons are summarized in Table 5-1; these tasks are built upon the EAFMSE Project EMP measures indicated earlier.

The commitments for quarterly and annual reports are indicated in Table 5-1 below, these reports will be subject to review by the World Bank to ensure the adequacy of the measures taken to cover all requirements of OP 4.01. If, according to the Banks review, the taken measures do not satisfy the OP 4.01 requirements, Form B sub-projects may require clearance from the Bank based on reviewing specific EIAs.

**Table 5-1: ESMF measures that should be taken by different parties**

<b>Issue</b>	<b>Proposed Mitigation Measures</b>	<b>Responsibility for Implementation</b>	<b>Responsibility of direct supervision</b>	<b>Means of supervision</b>
Develop a software that will connect ED with the regional offices	Develop the software so that regional offices could feed in sub-projects status, and the ED in the Head Quarters could follow-up this status	IT of the SFD	Head of the ED	Check the effectiveness of the software
Adequate screening of sub-projects	Class C sub-projects, sub-projects that are located in sensitive areas (including Nile islands) and tobacco production sub-projects should be excluded	REFPs	HQEFP	Review of periodic reports and the follow-up software
	Guide the MSEs of Class B and Class A sub-projects to fill the EIA Form and obtain EEAA approval	REFPs for classification and NGOs/MFIs for notification	HQEFP	Review of periodic reports and the follow-up software
	For the MSEs of sub-projects with special conditions these conditions to be included in the contracts	REFPs for classification and NGOs/FIs/MFIs for the contracts	HQEFP	Review of periodic reports and the follow-up software and occasional review of contracts
Follow-up approval of EEAA on EIAs	Prepare adequate Form B or Form A EIAs for relevant project	MSEs	NGOs/FIs/MFIs	Review correspondence with EEAA

Issue	Proposed Mitigation Measures	Responsibility for Implementation	Responsibility of direct supervision	Means of supervision
	Check the official approval of EEAA for Class A and Class B sub-projects prior to implementing the sub-project	REFPs	HQEFP	Review of periodic reports and the follow-up software and occasional review of approval letters
	Include the conditions of EEAA in their approval in the contract with MSEs	NGOs/FIs/MFIs	HQEFP and REFPs	Review of periodic reports and the follow-up software and occasional review of contracts
Follow-up the implementation of mitigation measures and monitoring activities during project implementation	Prepare quarterly reports about the progress in implemented the mitigation measures and monitoring activities committed in the EIAs and the special conditions	MSEs	NGOs/FIs/MFIs to ensure submitting reports and HQEFP and REFPs to review	Review MSE reports. and the follow-up software
	Conduct audits to sample sub-projects to ensure the accuracy of submitted reports	REFPs	HQEFP	Review audit reports according to pre-set auditing plan
Prepare Quarterly and Annual Environmental and Social Progress	Prepare collective quarterly reports about the status of sub-projects and any recommendations for the following quarter	REFPs	HQEFP	Review reports and the follow-up software

Issue	Proposed Mitigation Measures	Responsibility for Implementation	Responsibility of direct supervision	Means of supervision
Reports	Prepare collective annual reports about the status of sub-projects and any recommendations for the following year	HQEFP	ED and PIU Manager	Review reports

## 5.4 Capacity Assessment

The SFD has integrated environmental safeguard measures into its operation since the establishment of the EDU in November 1998, the EDU has evolved several times since then, and currently the ED has been established as a cross-cutting department in SFD. The capacity of the SFD, and its ED, to manage the implementation of the ESMF could be assessed with the following aspects:

- The management commitment: The management commitment towards adequate environmental management has been recently shown through the upgrading of the EPP to the EDM. The Manager of the EDM has been also appointed; the ED is currently in the process of preparing an environmental management system and recruiting staff members. These recent developments, in addition to the history of SFD in integrating environmental management into its operation shows that the management commitment is strong
- The existence of the institutional framework for environmental management: This aspect has also been demonstrated through the establishment of the ED. The ED Director will report to the CSHCD General Manager, which is one level under the SFD Secretary General. The role of ED will be cross-cutting among different sectors of the SFD
- The capacity and sufficiency of staff to carry out environmental management issues: The ED Director is an experienced environmental professional with proven academic and work experience. The ED is currently in the process of recruiting staff members to handle the ED activities. The HQEFP should be recruited to the ED, and should have experience in environmental management and screening, it is expected that the HQEFP will be recruited before the project start-up and will work under the ED Director. The REFPs already exists in regional offices, and have supervised environmental screening and follow-up for SME projects under different projects, including the EAFMSE project.
- Existence of documented procedures for environmental management: The ED is currently in the process of preparing a documented environmental management system with clear mandate, job descriptions for its staff members and standard procedures.

The capacity of FIs, MFIs and NGOs could not be assessed at this stage because they have not been selected yet. However, the role of these organizations will be strictly administrative tasks that are within the capacity of normal administration staff expected to be within these organizations.

For the level of beneficiary enterprises, it is expected that they will need services from registered environmental consultants for carrying out the EIAs. Because the level of finance provided for each sub-project is relatively limited it is likely that some owners of small enterprises may not have sufficient funds to hire consultants, these funds could be part of the loans given to enterprises that cannot provide funds for the EIAs prior to the project start provided that the sub-project passes the screening criteria.

It is recommended that the project should include incentives for complying enterprises with the ESMF requirements (reporting at time, effectively implementing mitigation measures ... etc.) to raise their commitments. This could be done through preparing a list of complying enterprises by the SFD, during the implementation of the project, so that these enterprises could have some financial benefits, such as:

- Funding part of the environmental requirements
- Dropping last installment, or part of the last installment
- Improving the reputation of these enterprises among intermediate financing bodies and these enterprises would be eligible for future finance facilities

The exact decision about such incentives, or possibly others, could be taken during the project implementation.

## 5.5 ESMF Budget

The budget for establishing the ED, recruiting the staff and developing the follow-up software will be provided by the SFD as the department has already been established within the organizational chart of the SFD and its mandate is cross-cutting and not only for the MSEDIG Project.

The training budget identified in the EMP of the EAFMSE Project shall be implemented during the course of the MSEDIG Project. Table 5-2 illustrates the training plan for ESMF in addition to allowance for technical assistance from external consultants during the course of the project. It has been assumed that the MSEs will cover the expenses of preparing EIA forms from their own resources or as part of their loans, as mentioned earlier, therefore the cost for preparing the EIAs was not included in the ESMF overall budget.

**Table 5-2: Training and technical assistance budget for the ESMF**

<b>Training / Capacity Building Activity</b>	<b>Participating Stakeholder(s)</b>	<b>Skills to be Acquired</b>	<b>Scheduling</b>	<b>Cost Estimate in LE</b>
Environmental Strategic Planning	ED Director and Staff	-Include environmental safeguards and polices into the corporate strategy -Continuously updating the environmental strategy according to new inputs and regulations	The first inclusion of environmental safeguards and policies to start asap. With regular updating activities	200,000

<b>Training / Capacity Building Activity</b>	<b>Participating Stakeholder(s)</b>	<b>Skills to be Acquired</b>	<b>Scheduling</b>	<b>Cost Estimate <i>in LE</i></b>
Annual and baseline reporting	-ED Director and staff -REFPs -HQEFPs -Focal points of NGOs, FIs and MFIs	-Prepare base line reports for sub projects with potential negative impacts Complete and analyze quarterly progress reports into annual report	At an early stage of the project and annually	150,000
Environmental auditing	-ED Director and staff -REFPs -HQEFPs	-Perform environmental auditing for micro and small subprojects with potential negative effects -Perform desk review and recommend corrective actions	During implementation and operation phases	250,000
Total training budget (The implementation of the above training events should be after assessing the courses that have been implemented during the EAFMSE so that the training program should be integrated with the previous achievements)				L.E. 600,000
Allowance for technical assistance				L.E. 400,000
<b>Total ESMF budget</b>				<b>L.E. 1,000,000</b>

## 6 Public Consultation

A public consultation workshop has been carried out during the preparation of this report. An announcement for the public consultation has been placed in the website of the SFD and the bulletin boards of the SFD regional offices; this announcement is in Annex 4. Invitations for the workshop have been directed to different stakeholders.

The workshop was held on October 10<sup>th</sup> 2013 and was attended by about 60 people representing the following organizations. List of participants and photos taken during the consultation is in Annex 5:

- Banks
- NGOs
- EEAA
- Environmental Management Units in Governorates
- Different departments in the SFD and Regional Offices
- Experts and university professors

The attendees were presented with the main features of the ESMF, and an Arabic Executive Summary was made available to them. Comments and suggestions by the participants were taken into consideration during the preparation of this document.

**Table 6-1: Issues discussed during the public consultation**

Issue	Response
Intermediate NGOs could have an awareness role to guide the beneficiaries toward compliance with ESMF measures. There should be awareness for beneficiaries about the environmental issues that could take form of awareness sessions, posters, or banners	Awareness and training already included in the ESMF measures. Leaflets, posters, or banners will be done by Regional Offices,



Issue	Response
<p>There should be incentives for complying enterprises towards ESMF measures, these incentives could include:</p> <ul style="list-style-type: none"> <li>-Funding part of the environmental requirements</li> <li>-Dropping last installment, or part of the last installment, for complying enterprises</li> <li>-Preparing list of complying enterprises among intermediate financing bodies and these enterprises would be eligible for future finance facilities</li> </ul>	<p>These ideas have been included in the ESMF and should be further discussed during the agreements with intermediate bodies to reflect the most beneficial conditions</p>
<p>Many representatives of governmental bodies indicated that there should be differentiation between the legal monitoring and the monitoring carried out through the project. There could be coordination channels between SFD regional offices and Environmental Management Units at the Governorates.</p>	<p>Coordination between governmental bodies and SFD Regional Offices could be established on as needed basis. It will not be advantageous to deal with beneficiaries according to law enforcement requirements only.</p>
<p>There was debate about what should be done with incompliant enterprises, some participants argued that there should be legal interference to stop or fine these enterprises, others argued that the SFD and intermediate bodies roles should be financial and advisory role.</p>	<p>The role of the ESMF should be to make sure that an adequate screening and monitoring process is being taken. The legal issues could be carried out on a case-by-case approach. This should be considered during the implementation phase.</p>
<p>Some representatives from banks indicated that their roles should not have any technical evaluation and will be strictly financial and administrative through reviewing the official papers brought by the beneficiary</p>	<p>This is already considered in the ESMF</p>
<p>There should be training courses for SFD regional offices, FIs and NGOs about their roles in the ESMF</p>	<p>This is already considered in the ESMF</p>

Issue	Response
Projects in protected areas are not prohibited but should be upgraded one level in the EIA class	This is already considered in the ESMF
It might be a good idea if SFD regional offices include representatives from the Environmental Management Units in Governorates to facilitate the licensing procedures for SFD projects.	This is already included in some of SFD Regional Offices and will be considered by the ED to be expanded for all Governorates
Other license, such as sewerage authority and HSE, should be also obtained	The licensing procedure for all concerned bodies is well integrated among the requirements of Local Authorities

## **Annex 1: Examples from EEAA Classifications of Projects**

## Special Conditions Projects<sup>9</sup>

### List of Projects that Have Special Conditions and are not Subject to EIA Requirements

Serial No.	Projects
1	Bakeries, cooking wheels and rotating ovens
2	Shops of roasting and cooking beans and grains (grain frying)
3	Shops of fruits and vegetables preparing and packaging
4	Rice husk removing facilities/ small mill (one/ two stone)/ cylinders mills operating with a power does not exceed 30 HP
5	Refrigeration shops (less than 10 tons)
6	Shops of chopping and packaging of pressed dates
7	Shops which manufacture dough sweets/ dry confectionary
8	Shops of milk fermentation, packing and selling
9	Dairy products facilities (of capacity less than 1 ton/day)
10	Sesame squeezer and tahini processing shops (Sergah)
11	Facilities of handmade textile and handmade carpets
12	Facilities producing garments and upholstery tapes
13	Mechanical carpentry workshops
14	Workshops of handmade manufacturing of musical instruments
15	Manual carpentry workshops
16	Shops of plastic working (plastic cutting and and welding/ ready made rolls cutting to manufacture plastic bags- all do not include plastic manufacturing)
17	Mechanical tiles workshops
18	Metals working workshops (iron working/ smith workshops/ metals turning and lathing workshops/ metallic sheets formation workshops/ metals formation by cold rolling and knocking) all do not include any melting or smelting processes
19	Metal electrical and acetylene welding workshops
20	Glass working shops/ glass cutting shops
21	Crystal smoothing shops
22	Mirrors silver-plating processes
23	Marble working workshops
24	Shops of manufacturing and assembly of umbrellas and sunshades
25	Gravure and zincography workshops
26	Manual painting workshops (without using spray guns)
27	Paper cutting workshops
28	Poultry and domestic birds shops, including slaughtering, preparation and selling
29	Fish markets and shops of fresh fish preparation and selling
30	Washing and dry cleaning shops for all textiles and carpets
31	Offset printing shops
32	Paints mixing shops, manually or computerized
33	Photography shops including developing and printing
34	Cars-body repairing workshops
35	Garages of private cars and taxicabs, with a total area more than 75 m <sup>2</sup> , and trucks garages (all do not include carrying out maintenance work)
36	LPG cylinders warehouses
37	Land reclamation projects of areas less than 100 feddans

<sup>9</sup> Some of the items of this list has been modified in an Arabic update of the Guidelines

# Class A Projects

Ministry of State for Environmental Affairs  
Egyptian Environmental Affairs Agency (EEAA)  
Environmental Management Sector  
Central Administrative for Environmental Impact Assessment



## A List of Some of Category (A) Projects

### 1- Industrial Projects

	Activity
	<b>1- Food Industries</b>
1-	Factories producing canned fruits and vegetables.
2-	Factories manufacturing fish products.
3-	Factories manufacturing and producing animals and fish fodders, without concentrates or protein manufacturing
4-	Factories producing smoked food including fish
5-	Molasses factories
6-	Ice factories
7-	Halvah manufacturing plants.
8-	Macaroni/pasta factories
9-	Factories producing biscuits and baked products
10-	Mineral water manufacturing and natural water bottling plants or manufacture of carbonated water
11-	Chewing gum manufacturing
12-	Ice- cream manufacturing
13-	Onion dehydrating facilities
	<b>2- Spinning and Weaving and Synthetic Fibers Industry</b>
14-	Spinning and weaving and knitting factories that does not include dyeing units.
15-	Cotton ginneries/ cotton pressing and cleaning factories/production of medical (sterilized) cotton
16-	Factories producing cords and ropes (not including any plastic processing)
17-	Ready-made garments
18-	Sponge matrices
	<b>3- Chemical Industries</b>
19-	Leather and shoe factories, not including tanning processes
20-	Storehouses of leathers (green, soft and dry) which does not include manufacturing.
21-	Paper processing, cardboard products and wallpaper manufacturing
22-	Leather and shoe factories, not including tanning processes
23-	Offset printing shops
	<b>4- Wooden products</b>
24-	Wood factories including drying and processing of wood without chemical treatment/soaking
25-	Spray painting facilities (including furniture spraying / spray booths)
	<b>5- Refractory, mining, building materials and plastics industry</b>
26-	Mechanical tiles factories.
27-	Manufacturing cement products (cement storage tanks, gutters covers, pipes)



## A List of Some of Category (A) Projects

28-	Factories for grinding gypsum, lime, and glass
	<b>6- Metallurgical industry</b>
29-	Factories of processing of precious metals such as gold, silver and platinum with no electroplating
30-	Metallurgical arum manufacturing
31-	Manufacturing of metal products without molding or electroplating

## 2- Agricultural Projects

	<b>Activity</b>
32-	Commercial farms for poultry, animals or pigs
33-	Reclamation of land of areas from 100 feddans up until 400 feddans

## 3- Petroleum Projects

	<b>Activity</b>
34-	Filling gas cylinders

## 4- Health Care Facilities

35-	Hospitals/ health care facilities (not including an operation room)
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	<b>Services</b>
40-	Photographic and film making studios
41-	Public garages that undertake maintenance.
42-	Service stations and vehicles lubrication (liquid and gas) and fuel pumping units
43-	Manual slaughterhouses

# Class B Projects

Ministry of State for Environmental Affairs  
Egyptian Environmental Affairs Agency (EEAA)  
Environmental Management Sector  
Central Administrative for Environmental Impact Assessment



## A List of Some of Category (B) Projects

### 1- Industrial Projects

	Activity
	<b>1- Food Industries</b>
1-	Breweries, malt fermentation factories.
2-	Vegetable oil extraction factories, not including treatment or refining.
3-	Plants manufacturing and producing animals and fish fodders, with concentrates and protein manufacturing.
4-	Tobacco grinding and packaging factories, cigarettes manufacturing plants
5-	Plants producing confectionary, juice and soft drinks
6-	Table salt production plants
7-	Factories producing dairy products (milk, cheese, yoghurt)
8-	Rice or crop mills
9-	Starch and yeast factories
10-	Commercial Mechanical or half mechanical slaughterhouses (related to processing)
	<b>2- Spinning and Weaving and Synthetic Fibers Industry</b>
11-	Plants producing synthetic fibers (such as synthetic silk and nylon) without dyeing units
12-	Factories producing cords and ropes (including plastic processing)
13-	Factories for retting natural fibers such as flax and their associated shaking and carding processes
	<b>3- Chemical Industries</b>
14-	Manufacturing protective masks for toxic gases
15-	Public Press or presses for magazines and newspapers
16-	Printing on cans and tin products
17-	Cork manufacturing and artificial sponge manufacturing factories.
18-	Plants producing and filling industrial gases
19-	Soap and glycerin factories
20-	Factories for plastic shaping/ plastic injection/ plastic pipes/ plastic piercing/ packaging plastic wires/ plastic crushing/ manufacturing elastics
21-	Packing and packaging liquid and solid chemicals and products.
22-	Synthetic glue (adhesive materials) factories
23-	Factories manufacturing tooth paste and powder, shampoo, hair oils, cosmetics, cologne and perfumes
24-	Fiberglass manufacturing plants
25-	Manufacturing dry pens and pencils
26-	Plants for mixing and packing fertilizers without production
27-	Extraction of coal from animal bones
	<b>4- Pharmaceutical Industries</b>
28-	Pharmaceutical factories involved in mixing and fermentation processes only



## A List of Some of Category (B) Projects

	<b>5- Wooden products industry</b>
29-	Wood factories with soaking processes (chemical treatment of wood)/artificial wood manufacturing plants
30-	Manufacturing wooden products such as windows, doors, accessories, furniture and desks
	<b>6- Refractory, mining, building materials and plastics industry</b>
31-	Recycling of used glass to produce glass products
32-	Marble and granite cutting, polishing and finishing factories
33-	Manufacturing cement products including painting processes
34-	Manufacturing bricks, plasters, and clay and sand bricks plants
35-	Lime and gypsum kilns/ potteries
36-	Plants carrying out asphalt mixing and producing construction and road paving materials and reinforced concrete mixer
37-	Manufacturing, cleaning and treating charcoal/ coal pyrolysis
38-	Treating quarries' clay
39-	Quarries for marble, sand and clay
40-	Pottery and china factories
	<b>7- Metallurgical industry</b>
41-	Manufacturing metallic cans
42-	Manufacturing of metallic furniture
43-	Manufacturing surgery tools and equipment
44-	Facilities for gold processing including electroplating
45-	Copper forging, smelting and milling
46-	Manufacturing foil sheets
47-	Foundries for iron, steel and non-ferrous metals except lead smelters
48-	Steel pipes plants
49-	Manufacturing photographic films
50-	Manufacturing electrical wires and cables
51-	Factories involved in surface treatment or electroplating of iron, steel or non-ferrous metals
52-	Boilers and steam turbines manufacturing facilities
53-	Electric transformers manufacturing facilities
54-	Manufacturing agricultural equipment and trucks
55-	Motor vehicle, trailers and tractors assembly and manufacture
	<b>8- Electrical and Electronic Industries</b>
56-	Manufacturing of air conditioners
57-	Manufacturing and assembling electrical apparatus and refrigerators
58-	Manufacturing scientific apparatus, calculators and electronic equipments
59-	Manufacturing electrical products (switches, ...)
60-	Manufacturing electric lamps and illumination accessories
61-	Manufacturing solar heating cells





## A List of Some of Category (B) Projects

	<b>9- Waste Processing, treatment or disposal projects</b>
62-	Facilities involved in recycling, reuse and processing liquid or solid non-hazardous wastes.
63-	Industrial wastewater treatment plants for individual facilities
64-	Industrial waste treatment units for individual facilities

## 2- Agricultural Projects

	<b>Activity</b>
65-	Establishment of fish farm in non-sensitive areas
66-	Reclamation of land from 400 feddans to 2000 feddans, not within natural protectorates

## 3- Health Care Facilities

	<b>Activity</b>
67-	Hospitals and health care centers (including an operation room)
68-	An incinerator or any waste treatment units serving an individual hospital

# Class C Projects

Ministry of State for Environmental Affairs  
Egyptian Environmental Affairs Agency (EEAA)  
Environmental Management Sector  
Central Administrative for Environmental Impact Assessment



## A List of Some of Category (C) Projects

### 1- Industrial Projects

	Activity
	<b>1- Food Industries</b>
1-	Sugar production and refining factories.
2-	Vegetable oil extraction or refining or other treatment processes
3-	Hydrated oils/ manufacturing margarine, hydrated vegetable and animal oils and fats for food/ manufacturing natural fats.
	<b>2- Spinning and Weaving and Synthetic Fibers Industry</b>
4-	Factories producing textile and carpets and including dyeing processes
5-	Manufacturing synthetic fibers such as artificial silk and nylon, which include dyeing processes
	<b>3- Chemical Industries</b>
6-	Leather tanning factories
7-	Manufacturing alkalis and acids and their derivatives
8-	Polymers producing facilities
9-	Oil paints, inks and varnishes plants
10-	Rubber factories
11-	Pesticide manufacture and formulation plants/ plants engaged in pesticides packaging and mixing processes
12-	Coal percolation and manufacturing its derivatives
13-	Pulp production plants from fibrous material
14-	Manufacturing engine oil
15-	Oil and grease factories
16-	Sulfur plants
17-	Integrated chemical installations for the production of basic organic or inorganic chemicals
18-	Phosphate fertilizers manufacturing factories
	<b>4- Pharmaceutical Industries</b>
19-	Pharmaceutical factories involved in synthesis processes or chemical or biological processes
20-	Manufacturing all types of vaccines
	<b>5- Refractory, mining, building materials and plastics industry</b>
21-	Primary glass industry (from primary raw material)
22-	Cement plants
23-	Facilities manufacturing porous metallic natural fibers
24-	Mines for mineral extraction including processing and extraction of precious metals
25-	Ceramics and porcelain factories
	<b>6- Metallurgical industry</b>
26-	Surface treatment of iron & steel or not ferrous metals/ electrostatic factories



### A List of Some of Category (C) Projects

27-	Lead smelters and processing
28-	Primary non-ferrous metals plants
29-	Primary iron and steel plants including the processing of the ore
30-	Coke production and processing plants
	<b>7- Electrical and Electronic Industries</b>
31-	Batteries plants
32-	Manufacturing and recycling of mobile phones' batteries
	<b>8- Waste processing, treatment and disposal projects</b>
33-	Hazardous wastes treatment or disposal facilities
34-	Facilities involved in solid or liquid hazardous waste recycling or reuse
35-	Central incinerator serving several hospitals or health care facilities
36-	Projects/ sites of sludge treatment
37-	Sanitary landfills
38-	Recycling of batteries including mobile phones' batteries

## **Annex 2: SFD Enterprise Sectors with Proposed EIA Classification**

### **1. The Industrial Sector**

**Note: Abbreviations used:**

<b>(C)</b>	<b>Form C project</b>
<b>(B)</b>	<b>Form B project</b>
<b>(A)</b>	<b>Form A project</b>
<b>(SC)</b>	<b>Project with special environmental conditions with no further EIA requirements</b>
<b>(NR)</b>	<b>No requirements for EIA</b>

	Classification	Basis of classification	Remarks
<b>Agriculture industries</b>			
Manufacture of fertilizers from animal waste, agriculture waste, palm waste, arum, straw mats	(A) except for waste processing which is (B)	Waste processing included in (B) list , arum included in A list, mats not included but could be equivalent to arum	Splitting these activities to 3 subsectors is recommended to account for different EIA classifications
Manufacture of fodder of animals, poultry and fish	(A) if proteins and concentrations not included, or (B) if included	Included in project list	Adding the condition that change the project EIA class should be added to the classification
Aboretums, seeds, flowers and grass	(NR)	Not included in list of projects, less impacts than reclamation of 100 fed which is (SC) class	
Production of silk from silkworm	(NR) or (A)	Not included in list of projects, minor impacts	
Production of fresh mushrooms	(NR) or (A)	Not included in list of projects, minor impacts	
<b>Food industries</b>			
Rubbing and grinding of rice, pluses and seeds	(SC) if power less than 25 HP, other wise (A)	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Drying and canning of vegetables, fruit, and medical plants	(A) for all products except onion drying which is (B)	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacturing of dairy products	(SC) for less than 1 ton/day capacity, (A) is more, (B) if bottled milk, cheese or youghort is included	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Manufacture of fish and smoked fish	(A)	Included in the list of projects	
Manufacture of confectionary from dough	(SC)	Included in the list of projects	
Manufacture of oils and juice	(B) if oils are not refined or treated, otherwise it is (C)	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Manufacture of jam, halawa, molasses, tomato paste	(A)	Halawa and molasses included in the list of projects and the remainder products could have the same degree	To be splitted in case different classification has been advised from EEAA
Manufacture of ice cream	(A)	Included in the list of projects	
Manufacture of meat and pastrami	(A)	Not included in the list of project, and could be the same class as fish production	
Manufacture of pickled products	(A)	Not included in the list of project, and could be the same class as canned vegetables	
Cafeteria and restaurants	(NR)	Not included in list of projects, minor impacts	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of vinegar	(B)	Not included in list of projects, could be equal class as brewing	
Automatic baking of bread	(SC)	Included in the list of projects	
Manufacture and refining of olive oil	(C)	Refining of olive oil makes the project of C class according to the projects list	
Roasting and salting of peanuts	(SC)	Included in the list of projects	
Manufacture of pasta and noodles	(A)	Included in the list of projects	
Manufacture of chocolate and cocoa powder	(A) or (B)	Could be equivalent to biscuits (A) or other sweets and confectionary (B)	
Manufacture of sweets with added sugars	(B)	Sweets and confectionary included in B list	
Manufacture of ice	(A)	Included in the list of projects	
Roasting and grinding of coffee	(NR) or (SC)	Could be equivalent to roasting seeds	
manufacture of tobacco	(B)	Included in the list of projects	Recommended to be excluded
<b>Wood industries</b>			
Manufacture of Arabisc wood	(SC) if no mechanical power used, (A) if so	Could be equivalent to manual carpentry workshops	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of doors and windows	(B)	Included in the list of projects	
Manufacture of bamboo products	(SC) if no mechanical power used nor mechanical painting, (A) in case of one or both conditions	Could be equivalent to manual carpentry workshops	
Manufacture of palm woods	(SC) if no mechanical power used, (A) if so	Could be equivalent to manual carpentry workshops	
Manufacture of antique furniture	(SC) if no mechanical power used nor mechanical painting, (A) in case of one or both conditions	Could be equivalent to manual carpentry workshops	
Manufacture of furniture	(B)	Included in the list of projects	
Mechanical carpentry	(A)	Included in the list of projects	
Manufacture of office tools	(B)		
Manufacture of wood flooring	(A) if no chemical treatment of wood, (B) if so	General condition for wood factories	Adding the condition that change the project EIA class should be added to the classification
Manufacture of wood frames	(A) if no chemical treatment of wood, (B) if so	General condition for wood factories	Adding the condition that change the project EIA class should be added to the classification
Manufacture of coal	(B) if no distillation of coal, (C) if so	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
<b>Engineering and Electric Industries</b>			



	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of air conditions	(B)	Included in the list of projects	
Manufacture of electric tools	(B) if no production of batteries, (C) if so	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Assembly of appliances (medical, sports, electronic)	(B)	Included in the list of projects	
Manufacture of cables and wires	(B)	Included in the list of projects	
Manufacture of electric panels	(B)	Included in general electric appliances (B list)	
Manufacture of aerial wires	(B)	Included in the list of projects	
Manufacture of elevators	(B)	Included in general machines and industrial equipment	
Manufacture of parts and special tools of electronic appliances	(B)	Included in the list of projects	
Manufacture of jewelry	(A) if no electrostatic painting, (B) if so	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Manufacture of buildings requirements (lockers, joints ... etc)	(B)	Could be equivalent to metallic furniture	
Khan El Khalili products (metal, wood, leather and tourist products)	(SC) if no mechanical power, smelting or painting	Assuming small works with no mechanical power, painting or smelting	Adding the condition that change the project EIA class should be added to the classification.

	Classification	Basis of classification	Remarks
<b>Textile industries</b>			
Manufacture of ready garments	(A)	Included in the list of projects	
Manufacture of tricot garments and textiles	(A)	Included in the list of projects	
Manufacture of sports ware and bathing suites	(A)	Included in ready garments	
Manufacture of oriental cloths	(A)	Included in ready garments	
Manufacture of socks and handkerchiefs	(A)	Included in ready garments	
Manufacture of beddings and knots	(SC) for manual process, (A) for mechanical process or dying	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of textiles	(SC) for manual process, (A) for mechanical process not including dying, (B) for others with production capacity less than 10 tons/day and (C) for more production capacity	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of carpets	(SC) for manual process, (A) for mechanical process not including dying, (B) for others with production capacity less than 10 tons/day and (C) for more production capacity	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of car textiles	(SC) for manual process, (A) for mechanical process not including dying, (B) for others with production capacity less than 10 tons/day and (C) for more production capacity	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of threads	(A) if no plastics contents, (B) if there are plastic contents and production is less than 10 tons/day, (C) for more production capacity	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of packing bags (linen, jute)	(B) for production capacity less than 10 tons/day, (C) for more production capacity	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
<b>Chemical industries</b>			
Manufacture of plastic products (mats, bags, zippers) and fiberglass	(B)	Included in project list	
Manufacture of buttons and textile accessories	(B)	Included in general plastic forming	
Manufacture of packing paper and gift wrapping paper	(A) if no pulping procedure, (C) for pulping procedure	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of paints, shoe polish, inks and waxes	(C)	Included in project list	
Manufacture of batteries	(C)	Included in project list	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of candles	(B)	Could be equivalent to soap production	
Manufacture of chalk for schools	(B)	Could be gypsum production	
Manufacture of plastic bottles and cans	(B)	Included in project list	
Manufacture of irrigation hoses and plastic pipes	(B)	Included in project list	
Manufacture of cosmetics and perfumes	(B)	Included in project list	
Manufacture of melamine, sanitary plugs and shells	(B)	Included in project list	
Manufacture of detergents, soaps, disinfectants and petroleum products	(B) for soaps and detergents - for disinfectants and petroleum products that include only packing (B) and processes that include reactions are (C )	Detergents and soaps included in B list, disinfectants are as general pharmaceuticals and petroleum products are general chemical processes	Splitting these activities to subsectors is recommended to account for different EIA classifications
Industrial dyeing	(B) if production capacity is less than 10 tons/day, (C ) for more production capacity	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of chemicals for fire extinguishing	(B) for packing processes, (C ) for processes that include reactions	General chemicals products	
Manufacture of plastic glass frames	(B)	Included in general plastic forming	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of packing materials from petroleum products	(B) for packing processes, (C ) for processes that include reactions	General chemicals products	
Manufacture of chemical products	(B) for packing processes, (C ) for processes that include reactions	General chemicals products	
Manufacture of tin containers	(B)	Included in project list	Recommended to be moved to metallurgical industries sub-sector
Manufacture of shoes and leather bags	(A)	Included in project list	
Manufacture of pharmaceuticals	(B) for mixing and packing only, (C ) for processes that include chemical or biological reactions	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of fertilizers (chemical and organic)	(B) for mixing and packing only, (C ) for processes that include chemical or biological reactions	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
<b>Metallurgical industries</b>			
Manufacture of nails	(B)	Could be equivalent to surgical tools production	
Manufacture of metallic products (such as pipes)	(B)	Included in project list	
Manufacture of equipment and machines (assembly and manufacture)	(B)	Included in project list	Recommended to be moved to engineering and electrical subsector

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of metal furniture	(B)	Included in project list	
Manufacture of aluminum doors and windows	(B)	Included in general metal furniture	
Manufacture of pins, clips and stationary tools	(B)	Could be equivalent to surgical tools production	
Manufacture of metal wires	(B)	Included in project list	
Manufacture of metal frames	(B)	Could be equivalent to surgical tools production	
Manufacture of heaters (gas, electric and solar heaters)	(B)	Included in project list	Recommended to be moved to engineering and electrical subsector
Manufacture of pots and household tools	(B)	Included in general metal containers or furniture	
Manufacture of automobile body	(B)	Included in vehicles production	
Manufacture of medical equipment	(B)	Included in project list	
Manufacture of metal containers	(B)	Included in project list	
Manufacture of accessories of cars, bikes and motorbikes	(B)	Included in vehicles production	
Manufacture of welding tools	(B)	Included in industrial tools	
Manufacture of abrasive tools	(B)	Included in industrial tools	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of lighters	(B)	Included in industrial tools and equipment	
Manufacture of automobile tools (brakes, plugs, power shifts ...etc.)	(B)	Included in vehicles production	
Manufacture of metal glass frames	(B)	Could be equivalent to surgical tools production	
Marble cutting workshops	(B)	Recommended to be moved to refractory industries sub-sector	
Manufacture of gas furnaces	(B)	Could be equivalent to boilers production	
Manufacture of metal doors	(B)	Included in metal furniture	
Manufacture of hanging chandeliers and lampshades	(B)	Included in metal furniture	
Manufacture of metal part of files	(B)	Included in metal furniture	
<b>Refractory Industries</b>			
Manufacturing of pottery	(B)	Included in project list	
Manufacturing of ceramics and tiles	(C )	Included in project list	
Manufacturing of china crafts, antiques and art crafts	(B)	Included in project list	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of marble and granites	(B)	Included in project list	
Manufacture of bricks	(B)	Included in project list	
Manufacture of glass and mirrors	(SC) for mirrors silvering workshops, glass cutting and surfacing, (B) for glass production from recycled glass, (C ) production of glass from raw materials	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Crushers	(B)	Included in project list	
<b>Paper industries and print houses</b>			
Manufacture of paper products	(A) if no pulping procedure, (C) for pulping procedure	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Print houses	(A) for offset printing, (B) for other print houses	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of packaging paper	(A) if no pulping procedure, (C) for pulping procedure	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Manufacture of cartons	(A) if no pulping procedure, (C) for pulping procedure	Included in project list	Adding the condition that change the project EIA class should be added to the classification.



	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Manufacture of booklets	(SC) for workshops and (A) for factories	Included in project list	Assuming no pulping operations
Bookbinding	(SC) for workshops and (A) for factories	Included in project list	Assuming no pulping operations
<b>Leather industries</b>			
Manufacture of shoes and bags	(A)	Included in project list	Assuming no tanning process
Manufacture of leather products	(A)	Included in project list	Assuming no tanning process
Leather tanning	(C )	Included in project list	

## **2. The Commercial Sector**

**Note: Abbreviations used:**

<b>(C)</b>	<b>Form C project</b>
<b>(B)</b>	<b>Form B project</b>
<b>(A)</b>	<b>Form A project</b>
<b>(SC)</b>	<b>Project with special environmental conditions with no further EIA requirements</b>
<b>(NR)</b>	<b>No requirements for EIA</b>

	Classification	Basis of classification	Remarks
<b>Wood trading</b>			
Woods	(NR)	No production process	
cabinets	(NR)	No production process	
Furniture	(NR)	No production process	
Kitchens	(NR)	No production process	
<b>Plastic and tires trading</b>			
Plastic products	(NR)	No production process	
Tires trading	(NR)	No production process	
<b>Building materials trading</b>			
Bricks and building materials warehouse	(NR)	No production process	
Tiles, ceramics and sanitary ware	(NR)	No production process	
Steel, pipes and paints	(NR)	No production process	
Glass and crystals	(NR)	No production process	
Marble and granites	(NR)	No production process	

	Classification	Basis of classification	Remarks
<b>Ready made garments trading</b>			
Ready made garments	(NR)	No production process	
Fabrics and beddings	(NR)	No production process	
Yarns and spinning products	(NR)	No production process	
Carpets	(NR)	No production process	
Canvas	(NR)	No production process	
<b>Metal and Engineering trading</b>			
Electric appliances and tools	(NR)	No production process	
Tools for workshops	(NR)	No production process	
Metal containers and household tools	(NR)	No production process	
Boutiques	(NR)	No production process	
Accessories and hair dressers tools	(NR)	No production process	
Decoration tools	(NR)	No production process	
Automobile spareparts	(NR)	No production process	
Metal furniture	(NR)	No production process	

	Classification	Basis of classification	Remarks
Electronics	(NR)	No production process	
Aluminum products	(NR)	No production process	
Glasses	(NR)	No production process	
Motorbikes spareparts	(NR)	No production process	
Mobile phones accessories	(NR)	No production process	
Tricycles	(NR)	No production process	
Industrial safety tools	(NR)	No production process	
Computers and accessories	(NR)	No production process	
<b>Food</b>			
Groceries and supermarkets	(NR)	No production process	
Poultry, animals and fish	(SC)	Included in project list	
Seeds, fodder, nuts roastery and flower	(NR)	No production process	
Fruit, vegetables and dairy products	(NR)	No production process	
Vegetble oils	(NR)	No production process	
Butchery	(A) for manual process, (B) for automatic slaughterhouses	Included in project list	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
poultry requirements	(SC) for manual process, (B) for automatic slaughterhouses	Included in project list	
Flowers and seedlings	(NR)	No production process	
Frozen poultry and meet	(NR)	No production process	
<b>Leather</b>			
Leather products	(NR)	No production process	
Belts and bags	(NR)	No production process	
Shoes	(NR)	No production process	
Tanned leather	(A)	Included in project list	
<b>Stationary</b>			
Stationeries	(NR)	No production process	
Paper trading	(NR)	No production process	
Computer requirements	(NR)	No production process	
<b>Chemicals and papers</b>			
Packing and trading of chemicals	(NR)	No production process	
Inks and dyes	(NR)	No production process	

	Classification	Basis of classification	Remarks
Fertilizers and agriculture seeds	(NR)	No production process	
Greases	(NR)	No production process	
Batteries	(NR)	No production process	
Cosmetics and medical tools	(NR)	No production process	
Industrial detergents	(NR)	No production process	
LPG warehouse / gasoline fueling station	(NR)	No production process	
Printing and advertising tools	(NR)	No production process	
<b>General trading</b>			
Agencies	(NR)	No production process	
Bazars	(NR)	No production process	
Export and import	(NR)	No production process	
Contracting and supply	(NR)	No production process	
Pharmacies	(NR)	No production process	
Selling outlet	(NR)	No production process	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Warehouses	(NR) for nonhazardous substances, (SC) for cold storage less than 10 tons capacity and LPG warehouses, (A) for cold storage more than 10 tons capacity and (B) for other hazardous substances	These conditions are included in project list - LPG storage included in project list, other hazardous substances would be equivalent	Adding the condition that change the project EIA class should be added to the classification.



### **3. The Animal Sector**

**Note: Abbreviations used:**

<b>(C)</b>	<b>Form C project</b>
<b>(B)</b>	<b>Form B project</b>
<b>(A)</b>	<b>Form A project</b>
<b>(SC)</b>	<b>Project with special environmental conditions with no further EIA requirements</b>
<b>(NR)</b>	<b>No requirements for EIA</b>

	Classification	Basis of classification	Remarks
<b>Animals</b>			
Fattening of calves	(A)	Included in project list as animal farms	
Growing cows, camels, ostrich	(A)	Included in project list as animal farms	
Growing sheep	(A)	Included in project list as animal farms	
Growing silk worm	(A)	Not included in project list, but could be equivalent to general farms	
Growing animals	(A)	Included in project list	
<b>Poultry</b>			
Growing chicken	(A)	Included in project list as animal farms	
Growing rabbits	(A)	Included in project list as animal farms	
Growing birds	(A)	Included in project list as animal farms	

	Classification	Basis of classification	Remarks
<b>Fish</b>			
Fishing	(NR) or (A)	Not included in projects list	Large scale fishing could be associated with some issues, it may be suitable to included it as Form A
Fish farming	(B) if not in sensitive areas	Included in project list	

## **4. The Services Sector**

**Note: Abbreviations used:**

<b>(C)</b>	<b>Form C project</b>
<b>(B)</b>	<b>Form B project</b>
<b>(A)</b>	<b>Form A project</b>
<b>(SC)</b>	<b>Project with special environmental conditions with no further EIA requirements</b>
<b>(NR)</b>	<b>No requirements for EIA</b>

	Classification	Basis of classification	Remarks
<b>Transportation and distribution services</b>			
Taxi services	(NR) if no garages more than 75 m2 included, (SC) if garages included without maintenance services, (A) if maintenance services included	Garages included in the project list	Adding the condition that change the project EIA class should be added to the classification.
Microbuses	(NR) if no garages more than 75 m2 included, (SC) if garages included without maintenance services, (A) if maintenance services included	Garages included in the project list	Adding the condition that change the project EIA class should be added to the classification.
Trucks	(NR) if no garages more than 75 m2 included, (SC) if garages included without maintenance services, (A) if maintenance services included	Garages included in the project list	Adding the condition that change the project EIA class should be added to the classification.
Distribution of LPG	(SC)	Included in project list	
Mobile services	(NR)	Not included in project list, minor or no issues	
Transportation services	(NR) if no garages more than 75 m2 included, (SC) if garages included without maintenance services, (A) if maintenance services included	Garages included in the project list	Adding the condition that change the project EIA class should be added to the classification.

	Classification	Basis of classification	Remarks
Renting of equipment (agriculture, construction, weighbridges, and hospitality ... etc.)	(NR)	Not included in project list, minor or no issues	
Fishing boats and tourist boats	(NR)	Not included in project list, minor or no issues	
Tricycle taxis	(NR)	Not included in project list, minor or no issues	
<b>Laundry and ironing services</b>			
Laundry	(SC)	Included in project list	
Ironing services	(NR)	Not included in project list, minor or no issues	
General cleansing	(A)	Not included in project list but has important issues less than waste recycling facilities	
Evacuation and removal of wastes	(A)	Not included in project list but has important issues less than waste recycling facilities	
<b>Advertising and business centers</b>			
Slik screen printing	(SC)	Included in project list	
Presentation equipment, videos and sound recordings	(NR)	Not included in project list, minor or no issues	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Posters, painting on glass and Bardi paper	(A)	Could be equivalent to offset printing	
Computer graphics	(NR)	Not included in project list, minor or no issues	
Photocopying, printing and typewriting	(NR)	Not included in project list, minor or no issues	
Businessmen services, internet marketing and advertising offices	(NR)	Not included in project list, minor or no issues	
Hotels and tourist services	(B)	Hotels included in B list	
Communication centers	(NR)	Not included in project list, minor or no issues	
Manual printings and publishers	(NR)	Not included in project list, minor or no issues	
Customs services	(NR)	Not included in project list, minor or no issues	
Security services	(NR)	Not included in project list, minor or no issues	
Organization of exhibitions	(NR)	Not included in project list, minor or no issues	
Decoration works	(NR)	Not included in project list, minor or no issues	

	Classification	Basis of classification	Remarks
Games shops (billiards, video games ... etc.)	(NR)	Not included in project list, minor or no issues	
<b>Maintenance and repair services</b>			
Electricians and maintenance of motors, ACs, and electric equipment	(SC)	Could be equivalent to metal workshops	
Cars maintenance	(SC)	Could be equivalent to metal workshops	
Computer maintenance	(NR)	Not included in project list, minor or no issues	
Plumbing	(NR)	Not included in project list, minor or no issues	
Batteries charging workshops	(SC)	Could be equivalent to metal workshops	
Automobile electronics maintenance	(SC)	Could be equivalent to metal workshops	
Carpentry workshops	(SC) if no mechanical power used nor mechanical painting, (A) in case of one or both conditions	Included in project list	
Tires maintenance	(NR)	Not included in project list, minor or no issues	



	Classification	Basis of classification	Remarks
Car mats maintenance and repair of shoes	(NR)	Not included in project list, minor or no issues	
Workshops for repair and painting of car body	(SC)	Included in project list	
Workshops for cars exhaust systems and installation of gas cyliners in vehicles	(SC)	Could be equivalent to metal workshops	
Painting workshop	(SC)	Included in project list	
Plastic cutting workshops	(B)	Included in project list	
<b>Photography services</b>			
Photography studio	(A)	Included in project list	
Printing photos	(A)	Included in project list	
Video film clubs	(NR)	Not included in project list, minor or no issues	
<b>Cloths and textiles services</b>			
Tailor	(NR)	Not included in project list, minor or no issues	
Ready garment workshop	(NR)	Not included in project list, minor or no issues	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Cotton filling workshop (MENAGED)	(NR)	Not included in project list, minor or no issues	
Cloths repair	(NR)	Not included in project list, minor or no issues	
Carpets workshop	(SC) for manual process, (A) for mechanical process or dying	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Leather products workshop	(SC) for manual process, (A) for mechanical process or dying	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
Textiles workshop	(SC) for manual process, (A) for mechanical process or dying	Included in general textiles production	Adding the condition that change the project EIA class should be added to the classification.
<b>Health and beauty services</b>			
Medical lab	(NR)	Should be lower than small hospitals in list A	
Hair dresser	(NR)	Not included in project list, minor or no issues	
Barber	(NR)	Not included in project list, minor or no issues	

	<b>Classification</b>	<b>Basis of classification</b>	<b>Remarks</b>
Hospital	(A) in no surgery services provided, (B) if so	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Medical center, physical treatment and gym	(NR) for physical treatment and gyms, (A) for medical centers if no surgery services provided, and (B) if medical centers include surgery services	Medical centers could be equivalent to hospitals	Adding the condition that change the project EIA class should be added to the classification.
<b>Food services</b>			
Ice cream and juice shops	(NR)	Not included in project list, minor or no issues	
Restaurants	(NR)	Not included in project list, minor or no issues	
Caferia	(NR)	Not included in project list, minor or no issues	
Meat and vegetables refrigerators	(SC) if less than 10 tons capacity, (A) if more	Included in project list	Adding the condition that change the project EIA class should be added to the classification.
Packing of food products	(SC)	Included in project list	
Café	(NR)	Not included in project list, minor or no issues	

	Classification	Basis of classification	Remarks
Slaughtering of poultry	(SC) for manual process, (B) for automatic slaughterhouses	Included in project list	Adding the condition that change the project EIA class should be added to the classification
Automatic slaughterhouse	(B)	Included in project list	
Grinding of salts and seeds	(SC) if power less than 25 HP, other wise (A)	Included in the list of projects	Adding the condition that change the project EIA class should be added to the classification
Grilling and roasting of fish	(NR)	Not included in project list, minor or no issues	
<b>Metal forming services</b>			
Metal turning workshop	(SC) if out of residential settlements	Included in project list	
Refractory workshop	(A)	Could be equivalent to automatic tiles factory	To be more clearly defined
Cutting of metals	(SC) if out of residential settlements	Included in project list	
Metal foundry workshops	(B) for all metals except lead, (C ) for lead foundries	Included in project list	Adding the condition that change the project EIA class should be added to the classification
Crushing workshop	(B)	Included in project list	
Welding workshop	(SC) if out of residential settlements	Included in project list	

	Classification	Basis of classification	Remarks
Filing workshop	(SC) if out of residential settlements	Included in project list	
Keys workshop and glass workshop	(SC) if out of residential settlements	Included in project list	Recommended to be splitted to two items as the special conditions are different in each case
Aluminum screen workshop	(SC) if out of residential settlements	Included in metal formation	
Manual brick workshop	(A)	Not included in project list, could be equivalent to automatic tiles factory	
Medical lenses and optical products	(NR)	Not included in project list, minor or no issues	
Painting workshop and metal surfacing	(SC) if out of residential settlements	Could be equivalent to workshops for repair and painting of car body	
<b>Programming services</b>			
Programming services	(NR)	Not included in project list, minor or no issues	
<b>Education services</b>			
Nursery	(NR)	Not included in project list, minor or no issues	

	Classification	Basis of classification	Remarks
<b>Honey</b>			
Honey combs	(NR)	Not included in project list, minor or no issues	

## **5. The Free Employment Sector**

**Note: Abbreviations used:**

<b>(C)</b>	<b>Form C project</b>
<b>(B)</b>	<b>Form B project</b>
<b>(A)</b>	<b>Form A project</b>
<b>(SC)</b>	<b>Project with special environmental conditions with no further EIA requirements</b>
<b>(NR)</b>	<b>No requirements for EIA</b>

	Classification	Basis of classification	Remarks
Medical clinic	(NR)	Should be lower than small hospitals in list A	
Vet clinic	(NR)	Small facility not included in project list	
Engineering consultancy office	(NR)	Small facility not included in project list	
Engineering office	(NR)	Small facility not included in project list	
Lawyer office	(NR)	Small facility not included in project list	
Computer education	(NR)	Small facility not included in project list	
Accounting office	(NR)	Small facility not included in project list	
Schools	(A)	Included in project list	



### Annex 3: Checklist for sub-projects exclusion criteria

Sub-project exclusion checklist			
If Any the answer to any of the below questions is yes, then the sub-project should be excluded			
Questions	Yes	No	N/a
<b>Sub-projects that would be categorized as C projects according to EEAA Guidelines</b>			
For sub-projects involve production of edible oils, does the project involve treatment or refining of the oil?			
For textile plants and dye houses, is the production capacity more than 10 tons/day			
For coal production, does the project involve distillation process?			
Does the sub-project involves production of batteries as main product or auxiliary product			
Does the sub-project produce paints, show polish, inks or waxes			
For plants producing soap, detergents, disinfectants, petroleum products, chemical products, pharmaceuticals or fertilizers, does the process comprise chemical reactions?			
Does the sub-project produce ceramics or tiles?			
For paper and carton plants, does the project involve pulping process?			
Is the sub-project from one of the following types: ceramics or tiles plants, leather tanneries or lead foundries?			
<b>Sub-projects that are located in a sensitive area</b>			

Sub-project exclusion checklist			
If Any the answer to any of the below questions is yes, then the sub-project should be excluded			
<b>Questions</b>	Yes	No	N/a
Is the sub-project located in a sensitive area such as inside Nile islands, next to Nile banks, or within 200 meters from sea high water mark?			
<b>Sub-projects that would involve landuse issues</b>			
Is the sub-project being implemented out of the zone being identified by the Local authority for the specific activity of the sub-project?			
Would the sub-project involve acquisition of land that has ownership disputes?			
Would one of the sub-project's consequences that any of neighbors, social groups, merchants or hawkers will be relocated from his original location or have access to his location?			
<b>Sub-projects producing tobacco</b>			
Is the sub-project producing tobacco?			

## Annex 4: Announcement for the Public Consultation



### دعوة لحضور جلسة التشاور الخاصة بإطار عمل خطة الإدارة البيئية والاجتماعية لمشروع تطوير المؤسسات الصغيرة ومتناهية الصغر للتنمية الشاملة

يقوم الصندوق الاجتماعي للتنمية حالياً بإعداد لمشروع تطوير المؤسسات الصغيرة ومتناهية الصغر للتنمية الشاملة (Micro and Small Enterprises Development for Inclusive Growth) بالتعاون مع البنك الدولي، ويهدف المشروع الى تحسين فرص حصول هذه المنشآت على التمويل مما يؤدي الى خلق فرص عمل وريادة الاعمال، ويعمل المشروع على تعزيز دور المرأة وتقليص الفجوة في فرص الحصول على التمويل من خلال استهداف المناطق غير المخدومة تقليدياً مثل القرى النائية والمناطق الريفية مما يساعد على تقليل الفقر وتحسين الظروف المعيشية للفئات الأكثر تأثراً من الأوضاع الاقتصادية الصعبة خلال الفترة الاخيرة.

وقد قام الصندوق بإعداد خطة عمل للإدارة البيئية والاجتماعية للمشروع (ESMF) وذلك لضمان اتخاذ التدابير اللازمة للتوافق مع القوانين والمعايير والسياسات البيئية والاجتماعية خلال مراحل تقييم وتصميم وتنفيذ المشروعات الفرعية.

في هذا الصدد، يتشرف الصندوق الاجتماعي للتنمية بتوجيه دعوة عامة للجهات المعنية بالمشروع بحضور جلسة تشاور لعرض خطة العمل للإدارة البيئية والاجتماعية للمشروع، بغرض الأخذ في الاعتبار جميع الآراء المختلفة المعروضة خلال الجلسة التشاورية وذلك لإعداد إطار الخطة النهائية.

وسيتيم عقد جلسة التشاور يوم الخميس 10 أكتوبر 2013 في قاعة The View بفندق ماريوت بالزمالك من الساعة العاشرة صباحاً الى الساعة الثالثة ظهراً.

## **Annex 5: Attendance List for the Public Consultation**



١٠	صا الكوي عبد اطفالى الدقى	مدير ادارة شؤون الشركة محافظة الدقهلية	٩٥٥٧٤١ - ٥٣ - ٥١٢٢١٢٨٥٨١٣
١١	احمد علي محمد الجادى	نائب مدير ادارة ابحاث الشركة البحر الأحمر	٥/٢٢٧٣٧٨٨٣٧
١٢	خالد عمار	مهندس ب.ب - ادارى ابحاث الشركة البحر الأحمر	٥١٢٨١٣٥٥٥٨٧
١٣	محمد احمد	مدير عام شئون البنى التحتية	١١٢٢٥٤٩٠٥٥٧
١٤	محمد محمد عبد الله	سورال ابحاث مكتب سويح	١١٢٩٩٥٦١٥٥ -
١٥	محمد عبد الرحمن	مستشار ب.ب - ابحاث الشركة	
١٦	سجاد احمد فوزى	مستشار ب.ب - ابحاث الشركة	
١٧	تامر خليل - برام	مستشار ب.ب - ابحاث الشركة	١٢٠١٢٧٨٠١٢ - ١٢٢٧٨٠١٢
١٨	امير احمد محمد احمد	مكتب ابحاث	١١١٢٥٤٩٠١٢
١٩	احمد محمد احمد	مدير عام شئون البنى التحتية	١٠٠٢٤٤٢٧٧ - ١٠٠٢٤٤٢٧٧
٢٠	محمد احمد احمد	نائب مدير ادارة المشروعات الصغيرة والمتوسطة	١٠٠١٠٧٧٨٠٩
٢١	عادل محمد	مستشار ب.ب - ابحاث الشركة	١٠٠١٠٧٧٨٠٩ - ١٠٠١٠٧٧٨٠٩







٤٦	عبد الرحمن بن محمد	نائب الرئيس	١١٤٧١٢٩٢ ~
٤٧	٢ حمزة بن محمد	مستوفى	١١٦٢٤٧٦٩٢
٤٨	١ محمد بن محمد	شؤون الهندسة المعمارية	١١٠٠ ٥١٥٢٦٠٥
٤٩	مستوفى	السكك	١٢٢٢٨٩٠٠٧٨٥
٥٠	محمد بن محمد	السكك	١٢٢٢٤٧٨٦١٢٥
٥١	محمد بن محمد	السكك	١٠٠٩٧٩١٢٢٧
٥٢	د/ احمد قتيبي	للاطباء العامة لشؤون محافظات	١٠٠٤٠٢٠٤٠
٥٣	د/ علاء الدين بن محمد	ادارة شؤون محافظات	١٠٠٥١٤٨٦٠٧
٥٤	طه بن محمد	ادارة شؤون	١٠٠٦٧٢٤٥٥٩
٥٥	٣/ محمد بن محمد	مدير ادارة شؤون	١٠٠٥١٢١٥٨
٥٦	٢/ محمد بن محمد	شؤون	١٠٠٦٢٠١٩٧٤
٥٧	٢/ محمد بن محمد	مدير شؤون	١٠٢٥١٠٦٣٣

٥٨	جمال محمد كبري	مدير عام / السيد / محمد /	١٠٠٥٤٤٦٧٠٦
٥٩	ساح محمد السري	مكتب السيد / السيد /	١٠٩٩٨٢٠٠٧
٦٠	عبد الله عبد السلام شحات	ادارة شؤون البيئة - منطقة الوادي	







