



ARAB REPUBLIC OF EGYPT  
MINISTRY OF TRANSPORT

# ALEXANDRIA METRO PROJECT PHASE 1 – ABOU QIR to MISR STATION

## RESETTLEMENT ACTION PLAN (RAP)



**EcoCon Serv**  
ENVIRONMENTAL SOLUTIONS

**SYSTRA**

**ALEXANDRIA METRO PROJECT**  
**PHASE 1 – ABOU QIR to MISR STATION**

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**RESETTLEMENT ACTION PLAN (RAP)**

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**ALEXANDRIA METRO PROJECT**  
**PHASE 1 – ABOU QIR to MISR STATION**

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## ABBREVIATIONS

ABBREVIATION	DEFINITION
AFD	Agence Française de Développement
AIIB	Asian Infrastructure Investment Bank
EBRD	The European Bank for Reconstruction and Development
EIB	European Investment Bank
ENR	Egyptian National Railways
ESIA	Environmental and Social Impact Assessment
LRP	Livelihood Restoration Plan
MoT	Ministry of Transport
NGO	Non-Governmental Organisation
PAB	Project Affected Businesses
PAP	Project Affected Person
RAP	Resettlement Action Plan
RF	Resettlement Framework

## GLOSSARY OF TERMS

TERM	DEFINITION
Compensation	Payment in cash or in kind for loss of an asset or a resource that is acquired or affected by the project.
Consultation fatigue	Too many requests for opinions, consultation meetings, focus groups, surveys and so on, which leads to affected people withdrawing their participation in the process.
Cut-off date	<p>The date after which anyone who moves into the project area is no longer entitled to compensation and/or assistance.</p> <p>In practice, the cut-off date is usually the date of completion of the census of people and inventory of assets in the project-affected area, unless there are local legal provisions for another arrangement.</p> <p>Persons found occupying the project area after the cut-off date are not eligible to project compensation or other resettlement benefits. Similarly, fixed assets (such as built structures or crops) established after the cut-off date will not be compensated.</p>
Displaced/project affected person (PAP)	Any person who, as a result of the land acquisition required by the project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Not all PAPs will need to move location due to the project.
Economic displacement	Loss of assets (including land) or access to assets that leads to loss of income or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources. People or enterprises may be economically displaced with or without experiencing physical displacement.
Expropriation	The process whereby a public authority, in return for compensation, requires a person, household or community to relinquish rights to properties (land and structures) that it occupies or otherwise uses.
Involuntary resettlement	Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition that will result in displacement. This occurs in cases of lawful expropriation or restrictions on land use based on eminent domain; and in cases of negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.
Land acquisition	Land acquisition includes both outright purchases of property and purchases of access rights, such as rights-of way.
Livelihood	A livelihood comprises the capabilities, assets

TERM	DEFINITION
	<ul style="list-style-type: none"> <li>• Wages from employment</li> <li>• Cash income earned through an enterprise service</li> <li>• Rental income from land or premises</li> <li>• Income from a harvest or animal husbandry</li> <li>• Share of a harvest (such as various sharecropping</li> <li>• Self-produced goods or produce used for</li> <li>• Self-consumed goods or produce</li> <li>• Food, materials, fuel and goods for personal common resources</li> <li>• Pensions</li> <li>• Various types of government allowances</li> <li>• Remittances from family or relatives.</li> </ul>
Physical displacement	Loss of house/apartment, dwelling or shelter as a result of project requires the affected person(s) to move to another location.
Replacement value	<p>This is usually calculated as the market value of the asset plus transaction costs such as taxes, stamp duties, legal and notarization fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of property.</p> <p>Compensation at full replacement value is sufficient for the affected person to replace project-affected land, structures and other assets to the same or better standard in another location.</p>
Resettlement action plan	The document in which a client or other responsible entity specifies the procedures it will follow and the actions it will take to mitigate adverse effects, compensate losses and provide development benefits to persons and communities affected by an investment project.
<b>Security of tenure</b>	<b>A measure to protect the resettled persons, to the greatest extent possible, from forced evictions at their resettlement site (for example, social housing).</b>
Vulnerable or at-risk groups	<p>These groups include people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, may be more adversely affected by displacement than others and who may be limited in their ability to take advantage of resettlement assistance and related development benefits.</p> <p>Vulnerable groups in the context of displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities, communities dependent on natural resources or other displaced persons who may not be protected through national land compensation or land titling legislation. These groups should be identified through the process of environmental and social appraisal (see PR1).</p>

*Source: Resettlement Guidance and Good Practice, Annex 1: Glossary of Terms*

## 1. INTRODUCTION

### 1.1 The Project

The European Bank for Reconstruction and Development (the “EBRD”), together with the European Investment Bank (“EIB”), Asian Infrastructure Investment Bank (AIIB) and the Agence Française de Développement (AFD) are considering providing finance to the Government of Egypt to finance the Phase 1 of the 3 phase Alexandria Metro Project to upgrade and electrify the existing railway line connecting downtown Alexandria and north-eastern Abou Qir into a high capacity metro system. Phase 1 of the planned Alexandria Metro Project routed between Abou Qir and Misr Station that is the subject of this Resettlement Action Plan (RAP) is herein referred to as the “Project”. Phase 2 and Phase 3 have not as yet been confirmed by NAT.

Historically, the Abou Qir line was established as a suburban railway line under the jurisdiction of the Egyptian National Railways (“ENR”). Ownership will be transferred to the National Authority for Tunnels (“NAT”) once the railway line is transformed into a high capacity metro.

### 1.2 Project Need

The design of the Project suggests that its implementation will result in temporary and/or permanent land acquisition as well as physical and economic displacement. The applicable environmental and social requirements for the Project are associated with EBRD’s Performance Requirement (PR) 5 on Land Acquisitions’ Restrictions on land Use and Involuntary Resettlement, EIB Environmental and Social Standard (ESS) 6 on Involuntary Resettlement, AIIB’s ESS2 on Involuntary Resettlement and AFD follows World Bank Group Standards WB ESS5 on involuntary Resettlement, in addition to, the EBRD (PR) 10, EIB has ESS10 on Information Disclosure and Stakeholder Engagement (collectively referred to as “Lender’s requirements”).

### 1.3 Aims of the Project

According to the plan drawn up by the Ministry of Transport, the Project aims to reduce traffic congestion in the coastal city streets, improve the governorate’s existing infrastructure and align with Egypt’s national efforts to promote clean energy and climate action.

The existing railway line (Abou Qir train) suffers from the lack of daily maintenance and the operation condition is generally poor which influences the operating safety and efficiency. The infrastructure and rolling stock are also in a very poor state. The rolling stock of the existing line fleet is small (6 trains used to operate the railway line), which also impacts the level of service of the line. At peak time, there is a train every 10 minutes and it takes about 50 minutes to travel from Abou Qir to Misr. In the past few years, the number of services has dramatically decreased, from about 200 services a day to a little over 100 services today. This has greatly impacted the ridership, estimated at 71,000 passengers a day.

### 1.4 Project Setting

Alexandria is underway to start implementing two transportation projects; the first being the development of the Al-Raml tram line, with the second to establish a 43 kilometre metro line from

Abou Qir in east Alexandria to Burg al-Arab in the west (the Alexandria Metro Project) at a cost of US\$2.5 billion<sup>1</sup>.

The Alexandria Metro Project will be constructed in 3 phases, the first of which includes relying on the current Abou Qir railway route which extends for 21.7 kilometres from Abou Qir to Misr station (the Project), double track regional railway connecting very dense areas in the centre and the eastern part of the city. The Project alignment starts from Abou Qir and connects the eastern zone of Alexandria to the central zone at Misr Station.

Phase 2 will begin at Misr Station routed to al-Max area at a length of about eight km, while the third and final phase extends from the al-Max area to the end of the line at a length of about 15.5 km.

The train will run six km on an overpass, and the rest of the track will be on the surface.

## 1.5 Project Categorisation

The Project has been assigned a Category A status in accordance with the EBRD Environmental and Social Policy (ESP) 2019 and Performance Requirements (PRs) 2014. The categorisation as a Category A project means that a comprehensive Environmental and Social Impact Assessment (ESIA), including review of associated documents must be carried out, followed by the public disclosure of the ESIA for 120 days.

EIB categorises their projects based on applying the classification provided by Annexes I and II of the EU EIA Directive or relevant EU legislation and criteria qualifying for a social assessment. The Project falls under the classification described under Annex 2 Clause 10 Infrastructure (h) of the EU Directive as *“tramways, elevated and underground railways, suspended lines or similar lines of a particular type, used exclusively or mainly for passenger transport”*. This being the case, the national authority has to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the basis of thresholds/criteria or a case by case examination. However, the national authority must take into account the criteria laid down in Annex III of the EU Directive. The Project ESIA is a requirement of licensing in Egypt.

Under AIIB requirements, the Project is as an A and as such ESIA and an ESMP is required and public disclosure is mandatory.

AFD has categorized the project as 'B+ - Substantial risk'.

As well as requiring the development of a comprehensive ESIA, this Category A Project also required the development of a RAP. This is due to the Project alignment necessitating the acquisition of land parcels from private owners and the physical and economic displacement of Project Affected Persons (PAPs)<sup>2</sup>. Details for the number of land parcels to be acquired and the PAPs impacted by the Project are described in **Chapter 5: People and Assets**.

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<sup>1</sup> <https://egyptindependent.com/alexandria-to-launch-its-first-surface-metro-project-at-2-5-billion/>

<sup>2</sup> Project Affected Persons, or PAPs, are all persons impacted by the involuntary resettlement, including shops and mobile vendors in the right of way of the proposed alignment, in addition to landowners and informal users of land associated with the depot land and Bab Sharq and Sporting Stations.

## 1.6 National Authority for Tunnels

National Authority for Tunnels (NAT) will be responsible for the construction of the Project and will be responsible for supervising the operation; which will be by a specialized operator.

The Government of Egypt, through the National Authority for Tunnels (NAT), will acquire the land needed for the construction and operation of the Project. The implementation of the RAP falls under the responsibility of the project owner: The National Authority of Tunnels (NAT).

NAT will be committed to complying with Lender's requirements, in addition to, the Egyptian law.

## 1.7 Purpose of the RAP

It is a widely accepted fact, if the impacts of the project left unmitigated, involuntary resettlement under development projects may give rise to economic, social and environmental risks. The purpose of the RAP is to establish the principles and procedures for identifying, mitigating and compensating the potential land acquisition induced impacts of the Project and to ensure that NAT's (Project owner) commitments with respect to land acquisition is in accordance with relevant national legislation as well as Lender's requirements. Furthermore, the RAP sets out mitigation and compensation measures for each of the impacted groups identified and outline the organizational arrangements that may be needed during different phases of the project. The RAP also describes the implementation plan in **Chapter 13: Implementation Schedule and Budget** and provides guidance on how the RAP implementation will be monitored and reported, including a time schedule and a budget for implementation.

The mitigation and compensation measures will cover all Project Affected Persons (PAPs) and Project Affected Businesses (PABs) for the loss of lands, properties, other immovables and assets, including livelihoods resulting from displacement and resettlement, as well as assisting these people in relocation and livelihood rehabilitation. The RAP may be triggered whenever any of the project's activities entail the acquisition of land and/ or the physical and economic displacement of people, causing the loss of land, property, assets, access (to land, property, and assets), income, or sources of livelihood. This RAP considers formal landowners, in addition to, formal tenants, informal users, business owners and employees.

In line with this scope, the generic objectives of the RAP are to:

- Avoid or minimise involuntary resettlement, physical and economic displacement;
- Consider feasible alternative project designs to avoid or at least minimise displacement, while balancing environmental, social and financial costs and benefits;
- Mitigate adverse social and economic impacts the use of the land and the access to land;
- Provide compensation for loss of assets at replacement cost; and
- Improve or, at a minimum, restore the livelihoods and standards of living of displaced persons to pre-project levels.

The specific objectives of the RAP are to:

- Outline the legal process and administrative procedures for the compensation of lost assets and livelihoods due to land requirements of Project activities and provide guidance to ensure compliance with applicable international best practices (Lender's requirements);
- Define potential land-based impacts and impacted people, businesses, communities, and groups;

- Define the process of identification and evaluation of affected assets, livelihood losses and the value of compensation to replace the loss of assets and impacted livelihoods;
- Set out the eligibility criteria and compensation entitlement matrix according to type of losses that are anticipated at the preparation stage;
- In line with Project Stakeholder Engagement Plan (SEP), outline the communication strategy for land acquisition related matters and engagement with PAPs and communities;
- Define the approach for grievance redress pertaining to land acquisition and management of complaints in line with SEP and Lender’s requirements;
- Specify the requirements for public disclosure, public and local community involvement in land acquisition process, including the development of a RAP;
- Ensure that rights of vulnerable are considered and a gender-sensitive approach is adopted for land take activities to determine if any additional measures are required to avoid hardship for women or any vulnerable groups;
- Assess the need and extent of monitoring of the land acquisition process; and
- Estimate a timeline and budget for implementing the land acquisition process under this RAP.

Regardless of the ownership and title of the impacted land, the RAP aims to compensate all impacted people and businesses. The scope of the RAP includes all the project activities that require land take and shall apply to PAPs and PABs irrespective of their number, severity and magnitude of impact. Since resettlement often affects the most vulnerable and marginalized groups (economically, politically and socially), the RAP shall particularly focus on impacts related to these groups.

**1.8 Structure of the RAP**

The RAP will follow the below structure:

**Table 1-1: Structure of the Report**

<b>1. Introduction</b>	Introduction to the Project and the RAP, presenting a brief description of the Project, the aim and rationale of the Project, Project location, Lender’s Categorization, NAT responsibilities and RAP proposed outline.
<b>2. Project Description</b>	Description of the Project and alternatives considered to minimise resettlement, the Project footprint and land requirements, a summary of the public Perception of the Project through a media search and the proposed construction timeline.
<b>3. Legislative Framework</b>	Lenders’ requirements and national and international resettlement legislation that is of relevance to the Project, including a gap assessment and measures to fill any gaps.
<b>4. RAP Methodology</b>	Description of the approach to RAP preparation followed by the methodology adopted for the socio-economic survey.
<b>5. Affected People and Assets</b>	The social baseline of the affected PAPs and communities, including the differing land uses of the land affected by the Project.
<b>6. Project Impacts</b>	Expected impacts/losses associated with the Project components/phases covered by the RAP, an explanation of all activities and alternatives considered to avoid or minimize displacement and identifies impacts on vulnerable groups, and potential risks related to gender.

7. Land Acquisition Process and Principles	Land acquisition approach to be implemented for the Project and the procedures for the delivery of entitlements.
8. Institutional Arrangements	The roles and responsibilities of all involved agencies/organisations, such as the NAT, Alexandria Governorate, Valuation Committee, Compensation Committee, other key actors, including coordination arrangements.
9. Entitlements and Compensation	Cut-off date for eligibility and eligibility of categories of displaced persons for compensation and other resettlement assistance. Entitlements matrix addressing categories of losses and entitlements pertaining to the project components/phases in question. Description of the methodology for valuing losses to determine their replacement cost and compensation and assistance measures. Description of process for executing compensation and assistance.
10. Livelihood Restoration Plan	Description of proposed livelihood restoration measures to be implemented as part of the RAP to support the PAPs that will be economically displaced due to Project activities. This includes support to maintain and improve current economic activities, as well as provide alternative livelihood opportunities.
11. Planned Engagement Activities	Description of the engagement timeline for land acquisition, consultation and disclosure of RAP, grievance mechanism and a Guide to Land Acquisition and Compensation.
12. Monitoring and Reporting	Description of the internal and external monitoring and evaluation arrangements and presentation of monitoring indicators to measure inputs, outputs, and outcomes for resettlement/livelihood restoration activities.
13. Implementation Schedule and Budget	Implementation schedule covering all activities from preparation of the RAP through implementation, including monitoring and evaluation. Tables presenting expected costs and budget for all resettlement activities and sources of funds.

This RAP, which has been prepared to comply with Lenders' requirements, utilises information from the census and asset inventory carried out for this Project by NAT (2021) and information from further studies and designs that were prepared for the Project.

This RAP, supported by the Project's **Guide for Land Acquisition and Compensation (GLAC)**, will be available for public review and comment for 120 days. After this disclosure period the documentation will be revised, where appropriate, in response to the comments received.

## 2. PROJECT DESCRIPTION

### 2.1 Overview of the Project

The Project comprises a 21.7 km metro line that will run on the existing train line between Misr Station and Abou Qir station. This will include replacing the existing diesel train and its track with an electrified metro. Phase 1 includes 20 stations, of which 15 are existing stations and 5 are new stations that will be constructed. The project's scope also includes the decommissioning of Al Raml railway station. The existing alignment is shown in Error! Reference source not found.. From the 20 total stations proposed for the metro, there is a total of 6 stations "at grade" and 14 stations elevated on the viaduct. The Project duration for constructing the Project will not exceed 3 years.

The metro line will be a dual track and will be uninterrupted by level crossings. The current stage of the metro project is going through the final steps of finalizing the feasibility study. The description provided in this chapter, is based on the final design<sup>3</sup> of the Project.

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<sup>3</sup> Should any unanticipated changes to the design occur resulting in changes in land requirements, these will be addressed in a RAP update or addendum.

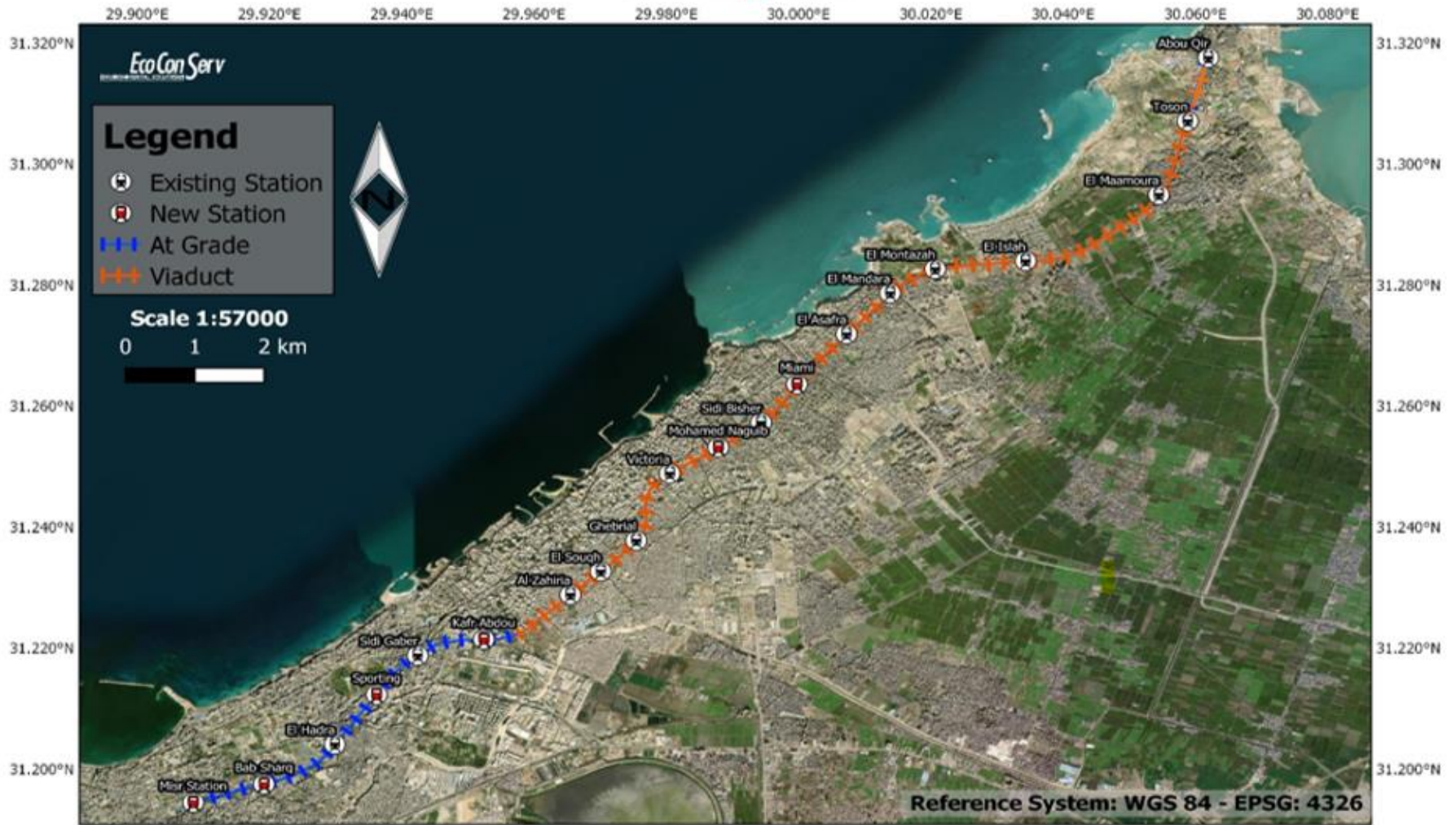


Figure 2-1 The Full Phase 1 Project Profile for the Alexandria Regional Metre

**Alignment Sections**

The Project’s alignment can be split into three sections based on existing and proposed stations:

- **Section A** – Abou Qir to Sidi Bishr
- **Section B** – Sidi Bishr to Zahiria
- **Section C** – Zahiria to Misr Station

The division of the Project alignment into three sections is based on a number of important factors:

- The alignment characteristics of each section is unique. Section A from Abou Qir to Sidi Bishr has a consistent alignment in the sense that its width is relatively the same. Even though it also covers a viaduct, Section B is more congested (in terms of population density and land) and a tighter alignment than section A. Finally, Section C covers the “at grade” segment that borders the ENR corridor until Misr Station.
- The impacts for each section differ, in terms of environmental and social impacts specifically in aspects related to air, noise, traffic, Land related impact, Livelihood, Infrastructure and underground utilities, Impacts on Structural Integrity of buildings etc.

**Section A**

The first section starts at the Abou Qir metro station and includes a total of 3 level crossings and 1 car underpass. This section includes a total of 9 stations (Abou Qir, Toson, El Maamoura, El Islah, El Montazah, El Mandara, El Asafra, Miami, and Sidi Bishr) as shown in Error! Reference source not found. which will all be set on a viaduct

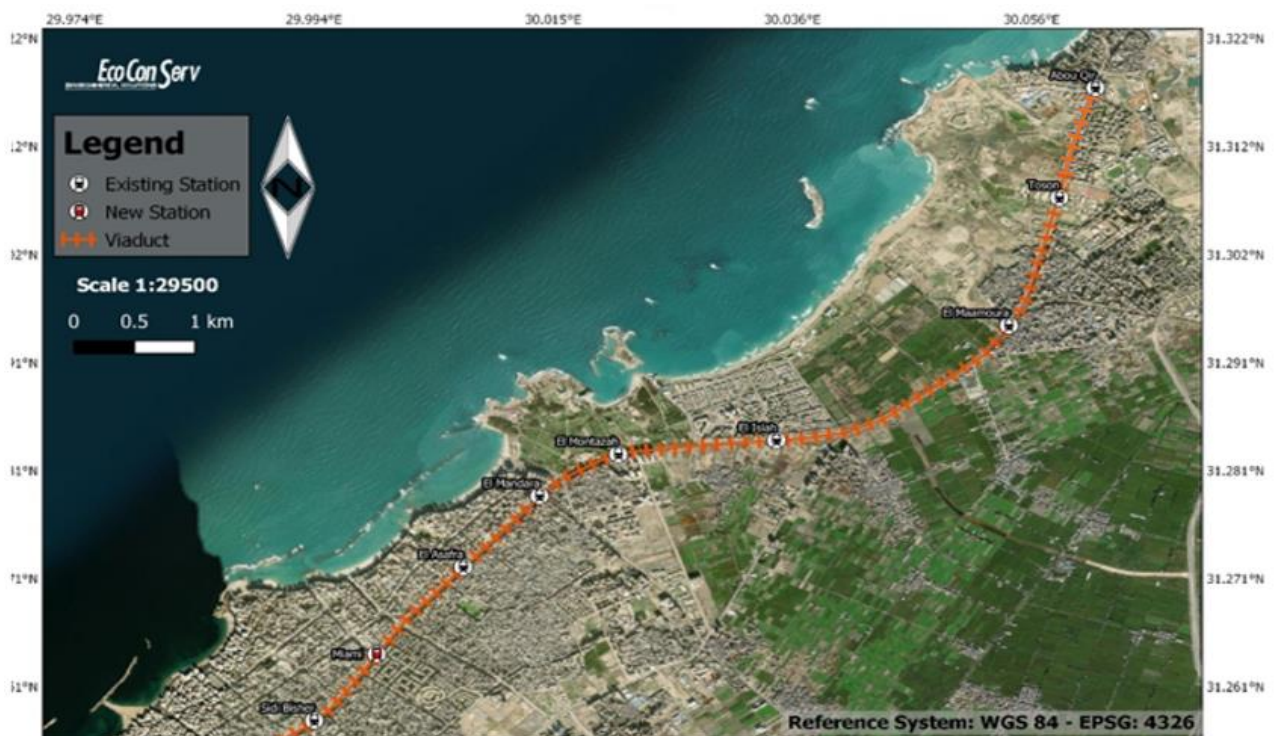


Figure 2-1 Section A Profile

**Section B**

The second section starts at the Sidi Bishr elevated metro station and ends at Al Zahiria station. It includes six stations (Sidi Bishr, Mohamed Naguib, Victoria, Ghebrial, El Souqh, and Al Zahiria) as shown in Error! Reference source not found. and this section will comprise the elevated viaduct section.



**Section C**

The final section starts at the transition between the viaduct from Section B to section C and ends at the newly constructed Alexandria Metro station that will be located near the Misr Train Station. It includes six stations (Kafr Abdou, Sidi Gaber, Sporting, El Hadra, Bab Sharq, and Alexandria Station) as shown in **Figure 2-4**. The profile for this section is fully “at grade” except for the initial transition between the elevated viaduct to the “at grade” profile.



Figure 2-3 Section C profile

Phase 1 will be implemented entirely within the corridor of the existing Abou Qir trainline and there are no expansions or extensions that will be part of this Phase. Permanent and temporary land take for the Project are described in **Chapter 6: Project Impacts**. The construction works for the Project will be procured as an engineering procurement and construction (EPC) contract, and includes the following structures and elements<sup>4</sup>:

Table 2-1: Project Structures and Elements (Phase 1)

Structures/ Project Elements	Specification/ Number
<b>Structures</b>	
Level crossings	11
Road Overpass	1
Road Underpass	8
Viaduct	The viaduct will be constructed following the proposed single column monopile approach to mitigate the need for extra land outside the existing corridor of the Project alignment. A total of 14 stations are planned to be elevated and constructed simultaneously with the viaduct.

<sup>4</sup> Vertical Alignment Report (Ref.99M-ACE-T1-TPL-RPE-GEN-0020-Rev.C) – 21/10/2020.

Structures/ Project Elements	Specification/ Number
<b>Elements</b>	
Decommissioning of the existing Abou Qir train ENR line and its associated infrastructure including the stations.	16 existing train stations and infrastructures (track, existing building, etc).
Rolling Stock (including the acquisition of new trains)	with a capacity of 2,500 passengers in AW2 <sup>5</sup> conditions. 21 Trains.
Civil and construction works for:	Depot (1), stations (20) and the viaduct, with a depot/stabling in Abou Qir as an option.
Electrical and mechanical works for the track and the infrastructural system to be implemented for the metro, and setting up power supply for the metro.	HVS to be implemented inside the depot.
Implementation of signalling system and centralized control system throughout and across the metro line.	The CCP to be implemented inside the depot.
Automated fare collection system at the stations.	
Track replacement and operational works.	
Diversion of existing Egyptian National Railways (ENR) tracks, and fencing of the metro track from the ENR track in Section C.	
Diversion of Public utilities during the construction works if necessary.	

This phase also includes the following Project components:

- **Pedestrian Underpasses and Footbridges**

The Project is not planned to have any level crossings for the “at grade” segments once the metro project is finished. All the current level crossings are to be transformed to pedestrian bridges. However, for viaduct segments, pedestrian crossings will be level crossings beneath the viaduct.

- **Road Underpasses and Bridges**

The purpose of the viaducts constructed is to mitigate the impacts of relocating existing roads or to pass through congested urban areas. All intersections from Abou Qir station to Zahiria, will continue to exist after construction phase beneath the viaduct. The existing Mandara underpasses will shift to an “at grade” road crossing beneath the viaduct, which will help resolve

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<sup>5</sup> AW2 (Added Weight 2) – Passenger Load includes seated passengers and standees at 4 passengers per m<sup>2</sup>.

traffic management in that area. There are no bridges expected to be constructed to complement or mitigate the impact on traffic from constructing the metro, based on the final alignment.

- **Fencing of the corridor**

The metro line will require fencing to be setup, specifically at the “at grade” stations and near the depot.

- **Depot (maintenance workshop)**

The Project includes the construction of a maintenance workshop for the metro, which will be further covered in Section C, and will include the construction of connecting lines and rail siding area transition from Kafr Abdou station.

- **Centralized control and administrative building, and high voltage sub-station**

In the same land parcel as the proposed maintenance depot, the Project includes the construction of a centralized control building for the metro line. Additionally, the primary administrative building will be located on the same land together with a high voltage sub-station.

## 2.2 Project Footprint

The spatial scope of the study/ investigation area for the assessment has been determined for the area of Influence for the RAP. The social aspects related to buffer zones or safety zones were also considered in the area of impact for the RAP works, that covers the following:

- The alignment and the right of way for the alignment;
- New stations and the depot land;
- The shops adjacent to the metro corridor; and
- The residential buildings close to the metro corridor.

The area of influence for the environmental and social aspects/ topics is limited to the area affected by temporary and permanent land take and related economic or physical displacement as described in Table 2-2 below.

**Table 2-2: Area of Influence for RAP Impacts**

Impact/ Aspect	Area of Influence
Land Use	Only limited to areas of land acquisition, which includes the Project alignment area (ENR properties), new stations land, the depot land and (13) Mosques built on ENR property.
Socio-Economic Conditions	The economic activities inside the existing stations and the informal economic activities inside the Project alignment corridor and inside the intersections were taken into consideration. In addition to the shops externally adjacent to the Project alignment corridor in sections A and B.  Socioeconomic consultations were undertaken with some impact groups to determine perceived impacts due to the

Impact/ Aspect	Area of Influence
	Project including employment opportunities, loss of livelihood activity, etc.
Structural Integrity of Buildings	The residential buildings close to the Project alignment corridor were taken into consideration. In the area adjacent to the train corridor, in the area between Al Zahiria and Sidi Bishr station (Section B).

### 2.3 Analysis of Alternatives

The Project has undergone a number of changes to the proposed station design approach and alignment typology, after various assessments and analysis. There are a number of core factors that contributed to the decision making with regards to the alternatives for the project. In some instances, the selected approach had little to no feasible alternatives. This section further analyses the alternatives from an environmental, technical, social, and economic against different criteria.

Several alternatives for this Project were considered prior to undertaking the ESIA and these are presented in detail within the Abou Qir To Misr Station ESIA. In summary the alternatives consisted of:

- **'No Project Alternative' scenario**

The first alternative to consider, is that of not developing the Abou Qir metro line. This alternative is used as the reference point to compare potential impacts that may arise during preconstruction, construction, operation, and decommissioning. The upgrade and electrification of the Abou Qir to Misr line will introduce various environmental and social gains. Since the benefits of the project outweigh the impacts (that are considered manageable), the no project alternative has not been taken to further analysis.

- **Site Alternatives**

The regional metro will be constructed along the same train track and current ENR corridor utilized for the Abou Qir metro line. If the Project were to be built in a new area, much higher costs will be incurred in providing all the necessary utilities for the new Project and land use impacts will be much more significant. It would also be unrealistic to construct in the highly congested urban zones of east Alexandria, where there is a significant lack of space for any infrastructure projects due to different factors (space, cultural heritage etc.) Hence, the current location is suitable since it will decrease the amount of resources used and will limit associated physical and economic displacement.

- **Station Alternatives**

Generally, the parameters used for assessing the different options for the two different station categories (grade and elevated) were economic and social, since there is limited land and the project has to fit within the existing corridor.

- **Depot Location**

There were different (5) options considered for the location of the Phase 1 depot. The Phase 1 of the Alexandria Regional Metro attempts to avoid and mitigate any potential impacts that could accompany the construction of an extension to the existing line as this would have traffic and land acquisition considerations. Consequently, options that would require more lands acquisition, removal of agricultural plots of land which are currently in use, traffic diversions and alternative paths, and costs of decommissioning and construction have been excluded.

The site Option selected for the depot was Nahass land. The vast majority of the land is a public owned land that was previously used by a factory, and is currently an empty unused land parcel (no informal economic activities present) that borders the right of way of the Project alignment between Zahiria station and the new proposed Kafr Abdou station. This land parcel would require land acquisition, is the case for every other option, but it is currently not being used making it the most feasible. In addition, the location is ideal since during construction and operation the impact would be significantly lower than the other proposed options on nearby traffic.

## 2.4 Alternatives Considered to Minimise Resettlement

The Project alignment is being used as a current railway alignment which is the largest benefit of this Project. The metro will be constructed along the same train track and current ENR corridor utilized for the Abou Qir metro line. If the Project was to be built in a new area land use impacts will be much more significant. The current location is suitable since it will decrease the amount of resources used and land acquisition.

Due to the implementation of the metro as a viaduct in Sections A and B, the Project will minimize additional land take and only requires permanent land take around the pillars maintaining access between pillars. The viaduct passes through an urban heavily populated area of Alexandria.

The Project design includes the construction of the depot and five new stations. The design has minimised the need to expropriate private land and private land ownership is avoided to the extent possible with the selection of these land parcels. Such as:

- Two of the new stations are elevated, which reduces land acquisition.
- As mentioned above; the site Option selected for the depot (Nahass land) and Kafr Abdou station the vast majority of the land is a public owned land that was previously used by a factory, and currently is an empty parcel of land.
- The two plots of land that were selected for Bab Sharq and Sporting stations are used as open-air parking areas and storage area by the landowner. There is only a small area of land used as a car wash by a formal tenant on Bab Sharq Station land parcel respectively. This reduces the effects of physical and economic displacement at these locations.

## 2.5 Project Land Requirements

### 2.5.1 Permanent land acquisition

#### 2.5.1.1 ENR property of the Abu Qir railway line

Currently, ENR owns the 21.7 Km railway corridor (carries in width from 15 to 50m or more along the Project alignment) and all the facilities located within. Coordination between ENR and NAT is however ongoing to transfer the ownership of the alignment according to the Prime Minister Decision No. 2360 of 2020, which considers the Abou Qir railway line with all its installations and facilities as a Public Interest Project. The decision also includes the right of acquisition of any real estate or land needed for the Project (**Appendix 1: Land acquisition ministerial decision**).

ENR property of the Abou Qir railway line includes existing facilities such as train stations, which include kiosks and cafeterias inside the current stations, shops outside the railway track, mosques across the Project alignment and stationary informal vendors. The impacts of land acquisition on livelihoods will be described in detail in **Chapter 6: Project Impacts**.

#### 2.5.1.2 Permanent land acquisition for the new station and depot sites

**Kafr Abdou Station and depot land:** The Kafr Abdo station and the depot will be built on the Copper factory land (Al-Nahhas), the vast majority of the land is owned by the Ministry of the Public Business Sector. The land was previously used by a factory, currently it is an empty land parcel and not used by informal users, there is only a building that is regularly used as a training center affiliated to the Industrial Development Authority. A ministerial decision of land acquisition has already been issued on 19 November 2020 in this regard. The Copper factory land is mostly vacant land with a number of decommissioned factories that have not been in operation in the last decades. The Nahass Land segment required for the metro depot is estimated to be approximately 204,436 m<sup>2</sup>.

**Bab Sharq Station:** The construction of the Bab Sharq station will require additional land from two adjacent land parcels:

1. Approximately 632 m<sup>2</sup> privately-owned land occupied by no structures, currently used as a parking lot;
2. Approximately 869 m<sup>2</sup> owned by ENR currently used as a warehouse; and
3. Approximately 380 m<sup>2</sup> owned by Alexandria governorate used as part of parking area.

**Sporting Station:** The construction of the Sporting Station will require additional land from two adjacent land parcels:

4. Approximately 852 m<sup>2</sup> occupied by an administrative building owned by the Health Directorate in Alexandria, which is a State-owned entity; and
5. Approximately 887 m<sup>2</sup> privately-owned with no structures, currently, used as a garage.

A ministerial decision of land acquisition has already been issued on 29 November 2021 for Bab Sharq and Sporting Stations. Site visits to the two lands parcel indicated that they are currently unused by informal users, and have no residents, used as parking area.

### 2.5.2 Temporary land acquisition

NAT stated that, the Contractor will attempt to avoid any land acquisition by utilising available ENR land at the existing stations as much as possible for storage of equipment and building materials.

In case avoidance is not possible, the Contractor may need to rent additional land for this purpose. This will be undertaken by a temporary lease agreement between the Contractor and the landowner. An official contract for a specific period, which will be renewed if needed.

## 2.6 Construction Programme

The Project is due to start construction commencing in 2023, with the Project becoming fully operational in 2025. The construction programme allows for pre- and post-construction activities such as mobilisation, enabling works, testing and commissioning.

A detailed construction programme will be prepared by the appointed Contractor.

### 3. LEGISLATIVE FRAMEWORK

#### 3.1 Introduction

The purpose of this chapter is to outline the Lender's policy, national legislative and EU legislative requirements, which this RAP has been prepared against to ensure the expropriation process is compliant these requirements.

#### 3.2 Applicable International Standards

##### 3.2.1 EBRD Requirements

The Project will be required to comply with the following Performance Requirements (PRs). The PRs cover key environmental and social issues in order to ensure that the Project will operate in compliance with the highest international standards in relation to said issues:

- PR1: Assessment and Management of Environmental and Social Impacts and Issues;
- PR2: Labour and working conditions;
- PR3: Pollution prevention and abatement;
- PR4: Health and Safety;
- PR5: Land acquisition, involuntary resettlement and economic displacement;
- PR6: Biodiversity conservation and sustainable management of living natural resources;
- PR7: Indigenous people (not applicable to this Project as no people who possess the characteristics of indigenous people as defined by PR7 are present in the Project area);
- PR8: Cultural heritage; and
- PR10: Information disclosure and stakeholder engagement.

The Project needs to meet the requirements for land acquisition, involuntary resettlement and economic displacement as specified in the EBRD's ESP (2019) and PRs. This RAP has been developed, in accordance with PR5 as well as PR10 information disclosure and stakeholder engagement in relation to RAP development and implementation..

##### Performance Requirement 5

PR5 sets out the EBRD's requirements in relation to involuntary resettlement, which refers both to physical displacement and economic displacement as a result of Project-related land acquisition and/or restrictions on land use; both temporary and permanent. PR5 also summarises the required contents of a detailed RAP.

Displaced persons may be classified as persons:

- Who have formal legal rights to the land (including customary and traditional rights recognised under national laws); and/or
- Who do not have formal legal rights to land at the time of census, but who have a claim to land that is recognised or recognisable under national laws; and/or
- Who have no recognisable legal right or claim to the land they occupy.

PR5 encourages Clients to acquire land rights through settlement agreements even if they have the legal means to gain access to the land without the consent of the seller. Such settlements help avoid

expropriation and can usually be achieved by providing fair and appropriate compensation and other incentives or benefits to affected persons. However, where settlement agreements are not possible and forced eviction is required, involuntary resettlement defined under PR5 is triggered. The following, of relevance to this Project, are required:

- Feasible alternative project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social, and economic costs and benefits, will be considered.
- From the earliest stages and through all resettlement activities the Client will involve affected persons. The Project should provide the affected communities the opportunity to participate in negotiations based on the established procedures.
- Any individuals or groups that may be disadvantaged or vulnerable must be taken into account.
- Where involuntary resettlement is unavoidable, a census, asset inventory and a socio-economic baseline assessment within a defined affected area will be undertaken.
- In the absence of specific national government procedures, a cut-off date for eligibility will be established, which is often the date of completion of the above census and socio-economic survey.
- In the case of economic (but not physical) displacement the Project should develop procedures to offer to the affected persons and communities' compensation and other assistance that meet the objectives of PR5.
- The RAP will establish the entitlements of PAPs or communities and will ensure that these are provided in a transparent, consistent, and equitable manner. The procedures for determining and awarding compensation should be documented in a Plan.
- All displaced persons and communities will be offered compensation for loss of assets at full replacement cost and other assistance. Where livelihoods of displaced persons are land-based, or where land is collectively owned, where feasible, land-based compensation will be offered.
- The Project should summarise the information contained in the resettlement of livelihoods framework or plan for public disclosure to ensure that affected people understand the compensation procedures and know what to expect at the various stages of the Project (for example, when an offer will be made to them, how long they will have to respond, grievance procedures, legal procedures to be followed if negotiations fail).
- The Project should set up a Project-level grievance procedure to deal with concerns about compensation and relocation.
- Monitoring of the resettlement and livelihood restoration process will be carried out in accordance with PR1 and should involve the participation of key stakeholders such as affected communities.

The EBRD Resettlement Guidance and Good Practice document (2017) shares practical experiences and good practice gained to-date on resettlement planning and implementation, lessons learned and useful tools. The principles used throughout the document are based on PR5.

### 3.2.2 EIB Environmental and Social Standards

The EIB Environmental and Social Standards provide an operational translation of the policies and principles contained in the 2018 EIB Statement of Environmental and Social Principles and Standards.

EIB Standard 6 “Involuntary Resettlement” defines involuntary resettlement as both physical displacement and/or economic displacement as a result of a project-related land acquisition or restriction of access to natural resources. The goal of this standard is to avoid, minimize Project induced resettlement, prevent forced evictions, respect individual’s right to adequate housing, ensure that resettlement mitigation measures are designed and implemented through meaningful consultation, and participation of PAPs.

Standard 6 describes in detail how resettlement should be planned, the tools and studies necessary for resettlement planning (census, socio-economic baseline studies, cut off dates, eligibility criteria), compensation strategies for resettlement and income restoration (valuation strategies for immovable assets at full replacement cost plus relocation expenses for homes, and full replacement cost based on market value, productive potential, or equivalent residential quality, including any administrative charges, title fees, or other legal transaction costs for land).

The implementation of S6 requires continuous stakeholder engagement and particular attention to vulnerable groups in line with the requirements of Standard 10 in relation to stakeholder engagement. S6 commits to improvements in the conditions of PAPs that used to live in substandard living conditions prior to the Project led displacement.

In addition, it must be taken into account Standard 7 sets out to avoid or minimize, or otherwise mitigate and remedy, potentially harmful effects of EIB operations on vulnerable individuals and groups. Standard 7 ensures that the vulnerable groups identified during the screening phase of the Project, and a detailed analysis is conducted during Social Assessment phase of the Project to assure that vulnerable groups are not adversely impacted by the Project. It is essential to include the vulnerable groups in the Project’s stakeholder engagement plan SEP in line with Standard 10.

### 3.2.3 AIIB Environmental and Social Framework

The Project will be compliant with AIIB’s Environmental and Social Framework (ESF) 2016 (amended 2019). The AIIB has elected to apply the EBRD’s Environmental and Social requirements on the Project.

The AIIB Environmental and Social Standards set out the AIIB’s commitment to sustainable development, through a Bank Policy and three environmental and social standards (ESSs). These standards set out mandatory environmental and social requirements to support decision-making by AIIB, manage operational and reputational risks of AIIB and its shareholders in relation to environmental and social risks and impacts on projects, provide for environmental and social screening and categorization of projects and analyse potential environmental and social risks and impacts of projects. The environmental and social requirement applicable to the Alexandria Metro project is ESS 2 Land Acquisition and Involuntary Resettlement.

### 3.2.4 AFD Requirements

All projects financed by AFD are required to fulfil national environmental and social regulations and a number of good international practices. These mainly include:

- The World Bank Safeguard Policies for public sector financing;
- The UN Principles for Responsible Investment (UNPRI);
- The IFC Performance Standards;
- The major international conventions ratified by Egypt;
- The United Nations Universal Declaration on Human Rights;
- The ILO fundamental conventions on labour law; and
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women.

AFD Group does not have specific E&S Standards and follows World Bank Group Standards.

### 3.3 Egyptian Legislation Related To Resettlement

This section summarises key Egyptian legislation that applies to this RAP.

#### Constitution of the Arab Republic Of Egypt

The Constitution of the Arab Republic of Egypt is the fundamental law of Egypt. The Egyptian Constitution of 2014 was passed in a referendum in January 2014, replacing the Egyptian Constitution of 2012, taking effect on 18 January 2014. A constitutional amendments referendum was held from 20 to 22 April 2019. Two chapters of the Constitution of the Arab Republic of Egypt are relevant to the expropriation of land:

**Chapter Two Part One: Social and Moral components** – The State shall guarantee equality of opportunity to all Egyptians and coordination between woman’s duties towards her family and her work in the society, considering equality to men in the political, social, cultural and economic spheres without detriment to the rules of Islamic jurisprudence.

**Chapter Two: Economical components** – Article 29 states that peoples’ land ownership is protected by the State, and is divided into three types: public, co-operative and private property.

*Public/State land* – Land belonging to the State. This includes the State’s public domain land that cannot be alienated, and the State’s private domain land which can be alienated generally through sale, lease, Takhssiss<sup>6</sup> or through Haq Intifaa<sup>7</sup>. The majority of land in Egypt is State-owned desert land which is largely undeveloped (approximately to be 90-95% of the national territory).

*Cooperative land* – According to Article 37 of the Egyptian Constitution; Cooperative ownership is inviolable, the state takes care of cooperatives, the law guarantees their protection and support, and

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<sup>6</sup> The conditional transfer of land dependent on meeting certain criteria, e.g. keeping the land use unchanged and paying the remaining instalments of the land price.

<sup>7</sup> “Haq Intifaa” in the Egyptian Law Haq Intifaa in Articles 985 to 995 of the Egyptian Civil Code is included in the section on rights subordinated to property rights. Usufruct properties: The right of usufruct is a right subordinated to the right of ownership that gives its owner the authority to use the asset without the need for the mediation of another person. The right of usufruct is not perpetual like the right of ownership, but rather it is temporary and ends with the expiry of the term specified for it. If no time has been set for its expiry, it ends with the death of the beneficiary. In all cases, it ends with the death of the beneficiary, even if the date has not expired. The usufructuary has the right to use and exploit the thing, which requires that the usufruct asset should not be destroyed by use.

guarantees their independence. It may not be dissolved or managed except by a court ruling. Owners of a co-op own shares of the cooperative instead of owning their unit outright, which would be the case in a condominium. Co-ops are often less expensive because they operate on an at-cost basis.

*Private land* – Land which may be alienated/transferred freely. Article 24 of the Constitution states that "private property is protected; and it shall not be expropriated except for the public benefit, and in return for fair compensation, to be paid in advance. All of this is in accordance with the law."

### Resettlement Legislation

While expropriation is inevitable, the expropriation fees must be paid prior to land entry by law. Moreover, the owner and occupant of the immovable property subject to expropriation and other concerned parties may file a lawsuit through judicial courts against the appraised values and factual errors. The relevant articles of the Law that will be referenced during the Project's land acquisition activities are explained briefly in **Table 3-1** below.

**Table 3-1: Egyptian legislation regarding expropriation**

Law <sup>8</sup>	Description
Egyptian Constitution	<p>The new Egyptian Constitution, which was issued at the end of 2014, stipulated in its Article 33 that "the state guarantees the legitimate ownership of all kinds: "Public, Cooperative, Private, and Endowment, and protect it, in accordance with the law".</p> <p>The Constitution also includes the following articles relating to ownership:</p> <p>Article 34 states that public property is inviolable and may not be infringed upon, and its protection is a duty in accordance with the law.</p> <p>Article 35 states that private property is protected, and the right to inherit is guaranteed. Private property shall not be expropriated except for the public benefit and in return for fair compensation paid in advance in accordance with the law.</p>
Law 187/2020	<p>The Law stipulates that Article 12 of Law No. 10 of 1990 regarding land acquisition for the public benefit is replaced by the following article:</p> <p>Article (12): If the forms or the ministerial decision have not been deposited according to the procedures stipulated in the previous articles within three years from the date of the public benefit decision in the official gazette; the decision shall be considered as if it was not for land acquisition for which the forms or the decision related to.</p> <p>The proposed amendment aims to address some of the drawbacks that have emerged because of the application of Law No. 10 of 1990 regarding land acquisition for the public benefit, which lead to obstructing the procedures of property dispute for the public benefit.</p> <p>The law also comes within the framework of creating a new constitution that aims to protect private property, through fair compensation paid in advance in accordance with the law.</p>

<sup>8</sup> These laws are amendments to some articles of the Law Act No.10 of 1990 concerning expropriation of immovable property for public interest. Therefore, all fall under the Law of Expropriation for the public benefit, and are distinguished by the law number and year of issuance according to what is published in the official newspaper.

Law <sup>8</sup>	Description
Law 24/2018	<p>Replace the provisions of Articles 2, 3, 5, 6, 7, 13, 15 of Law No. 10 of 1990 regarding expropriation of real estate for the public benefit.</p> <p>The public benefit report shall be attached to the decision of the President of the Republic or his authorised representative, accompanied by: a note stating the project to be executed; a drawing of the overall planning of the project and the real estate necessary for it.</p> <p>The compensation is estimated according to the prevailing prices at the time of the expropriation decision, and additional 20% of the value of the estimate included in the compensation.</p> <p>The decision for the public benefit shall be published with a copy of the memo referred to in Article 2 of this law in the Official Gazette. In addition, the memo will be affixed in the place prepared for advertisements at the headquarters of the local administration units, in the mayor or police headquarters, and in the primary court located in the property department, and on the front of the property subject to expropriation in a visible manner.</p> <p>Prior to the asset inventory, an appointment date will be announced publicly and “concerned parties” shall be notified in writing and “all owners and right holders” will be convened to appear before the responsible committee conducting the inventory on the project site to identify/clarify properties and ownership rights.</p>
Law 1/2015	<p>Amendment of some provisions of Law No. 10 of 1990 on land acquisition due to public interest. The amendment states in Article 7 that after depositing the compensation, the entity in charge of acquisition shall prepare lists with the real estate subject to acquisition, areas, locations, names of owners and property holders, their addresses, and the value of compensations stipulated. These lists and respective maps showing the location of all properties, shall be sited in the head office of the entity in charge.</p> <p>Article 8 also states that the concerned owners and holders of rights have the right to object to the information contained in such lists within 15 days from the date of posting and publishing the lists and information of the expropriated properties.</p>
Law 577/1954 & Law 27/1956	<p>Law 577/54, which was later amended by Law 252/60 and Law 13/162, establishes the provisions pertaining to the expropriation of real estate property for public benefit and improvement.</p>
Law 10/1990	<p>This Law identifies transportation projects as public benefit activities. It describes acquisition procedures as follows:</p> <ul style="list-style-type: none"> <li>• The procedures start with the declaration of public interest pursuant to the presidential decree accompanied with memorandum on the required project and the complete plan for the project and its structures (Law 59/1979 and Law 3/1982 provided that the Prime Minister issues the decree); and</li> <li>• The decree and the accompanying memorandum must be published in the official newspapers; a copy for the public is placed in the main offices of the concerned local Government unit.</li> </ul> <p>This law has specified, through Article 6, the members of the Compensation Assessment Commission. The commission is made at the Governorate level, and consisting of a delegate from the concerned Ministry’s Surveying Body (as President), a delegate from the Agricultural Directorate, a delegate from the Housing and Utilities Directorate, and a delegate from the Real Estate Taxes Directorate in the Governorate.</p>

Law <sup>8</sup>	Description
	<p>The compensation shall be estimated according to the prevailing market prices<sup>9</sup> at the time of the issuance of the Decree for Expropriation.</p> <p>Article (21) Law 10 of 1990: If only a part of a land parcel is subject to expropriation, with the remaining land not able to be used, the concerned parties (PAPs) are able to submit a request under Law for expropriation of the entire land parcel during the period stipulated in this Law. If this occurs, all the procedures stipulated in this Law shall be followed without the need to issue the decision defined in Article (2) of this Law.</p>
Law 577/1954	<p>Law 577/54, which was later amended by Law 252/60 and Law 13/162, establishes the provisions pertaining to the expropriation of real estate property for public benefit and improvement.</p> <p>Article 23 of this law states; <i>“If the purpose of the property expropriation is the establishment of a squares, streets, or their expansion, modification, demarcation, or the establishment of a new district, or for its improvement/upgrading or beautification, or for any health related matter; property expropriation may include, in addition to the real-estate property needed for the project, any other real-estate property which the administration in charge seems to be necessary to achieve the project’s objective or any other property whose current state (whether in size or form) is not consistent with the required improvement.”</i></p> <p>Moreover, the first article of Law No. 27 of 1956 allows for the expropriation of districts for their improvement, upgrading, re-planning, and reconstruction. Article 24 of Law 577/54 also stipulates that in case only partial expropriation of real estate property is required, and the remaining un-expropriated part will not be of benefit to the owner; the owner shall be given the right to submit a request within 30 days (beginning from the date of final disclosure of the list of the expropriated property) for the purchase of the entire area.</p>
Law 27/1956	<p>Law No. 27 of 1956 stipulates the provisions for expropriation of districts for re-planning, upgrading, and improvement, and the amended and comprehensive Law No.10 of 1990 on the expropriation of real estate for public interest.</p> <p>The first article of Law No. 27 of 1956 allows for the expropriation of districts for their improvement, upgrading, re-planning, and reconstruction. Article 24 of Law 577/54 also stipulates that in case only partial expropriation of real estate property is required, and the remaining un-expropriated part will not be of benefit to the owner; the owner shall be given the right to submit a request within 30 days (beginning from the date of final disclosure of the list of the expropriated property) for the purchase of the entire area.</p> <p>It should be noted that the new law has not restricted the right to request the purchase of the remaining un-expropriated portion of real estate whether it is a building or land.</p>
Civil Code 131, 1948	Articles 802-805 outline the rights of private ownership:

<sup>9</sup> These market prices are established for each asset as follows:

- Houses: Housing and Utilities Directorate in the governorate,
- Crops and trees: According to the price list issued by the Agricultural Directorate in the governorate, it is updated and approved every year.
- Land: Directorate/ Survey Authority in each governorate.

Law <sup>8</sup>	Description
	<ul style="list-style-type: none"> <li>Article 802 states that the owner, pursuant to the Law, has the sole right of using and/or disposing his property;</li> <li>Article 803 defines what is meant by land property (immovable assets that fall under this category);</li> <li>Article 805 states that no one may be deprived of their property except in cases prescribed by Law and would take place with an equitable compensation.</li> </ul>

**Additional Legislation**

Supplementary to the Egyptian Constitution and the primary laws regarding expropriation listed above, the legislation detailed in **Table 3-2** is also applicable to the Project.

**Table 3-2: Additional Egyptian Legislation Related to Land Acquisition**

Law	Description
Forest Law Pasture Law	<p>One of the key legislative pillars of nature protection in the Arab Republic of Egypt is the Law No. 102/1983 on protected areas. Warning signs with pictograms of forbidden activities including big notice "By Law No. 102 of 1983" can be found on every beach along the Red Sea. Everyone is obliged to respect the law.</p> <p>By the Law No. 102/1983 shall be prohibited:</p> <ul style="list-style-type: none"> <li>catching transporting killing or disturbing wildlife</li> <li>damaging or removing any living organisms or natural features and resources such as shells, corals, rocks, or soil for any purpose</li> <li>damaging or removing plants (from) the protected areas</li> <li>spoiling or destroying the geological structures (and other features) of areas serving as natural habitats and breeding areas for plants and animals introducing foreign (non-indigenous) species of biota into the protected area</li> <li>polluting the soil, water, or air of the protected areas in any manner.</li> </ul> <p>Article 2 in the Law No. 102 of 1983 which says that hunting, quarrying and disturbing nature in protected areas of the Arab Republic of Egypt is forbidden. This de facto means that all protected areas of Egypt are considered to be a wilderness. There is one more interesting fact. The Law No. 102 of 1983 is addressed to protected areas only. However, based on our observation it is valid for entire coral coastline of the Red Sea in Egypt. More specifically, building activities are allowed out of national parks and nature reserves, but nearby natural beaches and coasts must remain untouched.</p>
Cadastral Law	<p>The Public Survey Authority was established in 1898, to preserve the rights and property of the people and the government in their real estate and lands, under the name of the Public Survey Authority, and the purpose of its establishment at the time was to cover the land of Egypt with topographic maps, and to create maps and ownership books for agricultural lands located within the reins, and for real estate built within cities with the aim of collecting taxes real estate on it, and the establishment of records of those assigned to it.</p> <p>In 1971, the Egyptian General Authority for Surveying turned into a public authority affiliated with the Ministry of Irrigation, and its tasks were determined by several</p>

Law	Description
	<p>republican decisions, the latest of which was Republican Decree No. 328 of 1983. Its system of supervision over survey work carried out by others was determined by Republican Decree No. 298 of 1984, then it turned into an economic authority 2001.</p>
Land Registry Law	<p>Land &amp; Real Estate Ownership Registration Law Law 142/1964</p> <p>This law governs cadastral surveying, mapping activities, and property registration in Egypt. It emphasizes the application of the Real Folio System to register agrarian lands as was introduced by Law 142/1964. Article 1 provides for the Real Estate Registry which refers to a land cadastre that states the characteristics of each property, its legal status, the rights and obligations of different parties in relation to the land, as well as all the transactions that have been carried out. According to Article 58, every landlord has the right to be handed a copy of the real estate journal which is referred to as a "Title of Ownership".</p>
Notification Law	<p><i>Notification of workers contract termination</i></p> <p>It is carried out in accordance with the Egyptian Labor Law 12 of 2003.</p> <p>Articles 111 to 118 clarify the terms of work contracts termination notification in accordance with the law.</p> <p><i>Notification of lease termination</i></p> <p>The relationship between the landlord and the tenant is governed by the Premises Lease Law No. 49 of 1977 and Law No. 4 of 1996.</p> <p>Law 49 of 1977 prohibits the landlord from receiving a rent advance and considers the failure to specify a rental period in the rental contract as a permanent continuation of this contract.</p> <p>Law No. 4 of 1996 allows the landlord to receive a rent advance, as well as specifying a contract period of no more than 59 years. The landlord has the right to terminate the contract after the lease payment period has expired, and the landlord may make an annual rent increase.</p> <p>All contracts (work contracts or lease contracts) expire with the end of the contract period stipulated in the contract or the death of the contractor (except for the old contracts that were said in 1996). The contract is also valid in accordance with the conditions specified within it and agreed upon by both parties (whether they include a period of notification or not).</p>

### Announcement of Prime ministerial decree

After a preliminary expropriation assessment desk study was carried out, the Ministry of Transport (MoT) presented a memorandum to the Cabinet of Ministers to issue a decree of public interest for the Project.

A field survey was then conducted by NAT (through a consultant) to confirm the outcomes from the feasibility study for the design to request land for the Project to be included in the ministerial decree. Refer to **Chapter 7: Land Acquisition Process and Principles** for further details. . The MoT and NAT then requested the Prime Minister to issue the public interest decision of land acquisition based on the survey result.

A Prime Ministerial Decree of land acquisition for public interest (Decree No. 2360 November 19, 2020, and the amended ministerial decree No. 3301 November 29, 2021) was therefore issued with a memorandum covering the project description and necessary area for land acquisition. The decree was also published in Egypt's national gazette (No. 47 A November 19, 2020, and the amended decree No. 47 F November 29, 2021), as well as the headquarters of a governorate office and first instance court in the jurisdiction area where the land acquisition will be conducted.

Based on the issuance of the Ministerial Decree, NAT has deposited the estimated initial compensation amount into an escrow account until the final estimates of the compensation are completed. This evaluation is carried out by the Egyptian Survey Authority (ESA) and the Alexandria Survey Directorate (ASD) under national law.

### **Administrative Structure**

The Ministry of Transportation is the responsible party for requesting the issuance of the relevant decrees such as public interest, land acquisition and establishment of the compensation committee within NAT for the land acquisition requirements of the Project. The ASD and ESA are considered the entities responsible for estimation and compensation value of land and land acquisition for the Project. The compensation committee established within NAT covers the compensation for informal users and impacts on livelihoods. **Chapter 8: Institution Arrangements** describes the full institutional arrangement for implementing this RAP in-line with Lender's requirements.

### **3.4 Gap Analysis Between Lenders Requirements And Egyptian Expropriation Law**

The key gaps between the national legislation of Egypt and Lenders Requirements relevant for this Project are summarised in Error! Reference source not found. below.

Table 3-3: Gap Analysis between Lenders Requirements and Egyptian Law

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
<b>Avoidance and Minimisation</b>	The Client will consider feasible alternative Project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social, and economic costs and benefits.	The Client will avoid or, when unavoidable, minimise involuntary resettlement by exploring alternative projects, project designs and locations; and avoid any forced evictions.	There is no provision regarding the avoidance or minimisation of resettlement or forced eviction in Egyptian legislation.	The avoidance and minimisation of impacts is not required by national legislation, but it is required by the Lenders.	Measures have already been taken to avoid and minimise resettlement, in addition to, forced eviction, and alternative designs have been considered for the Project. <sup>10</sup> Project alternatives already considered are described in <b>Chapter 2: Project Description Section 2.3</b> . In addition, the alignment follows the existing railway right of way, where feasible, to minimise land acquisition and economic displacement.
<b>Identification of Potentially Adverse Impacts on Land Acquisition</b>	Affected populations and impacts should be identified through thematic maps and carrying out a census. An inventory of affected assets should be collected, and socio-economic surveys and studies should be carried out. Analysis of the information collated should be	Conduct a census and a socioeconomic baseline survey to identify all PAPs who will be physically or economically displaced and eligible for compensation and/or assistance. The socioeconomic baseline survey shall include current socioeconomic profile of the PAPs, an assessment of	Only a census of formal landowners and an inventory of assets is required by Egyptian Law.  Land acquisition through expropriation requires the preparation of a census of affected immovable assets, and a list of their owners. The	No social studies, surveys and consultations are required under Egyptian Law; only the consultation activities related to the preparation of the EIA. No census of informal users is required.	Asset inventory of those with formal rights (land/ assets owners): The ASD is responsible for the census of the land/assets owners mentioned in the land acquisition ministerial decree and issuing a list that which include the landowner's name, area and compensation amount. (lists of

<sup>10</sup> SYSTRA, the project consultant, has prepared several studies, including:

PHASE 1 – ABOU QIR to MISR STATION. Occupations along the corridor.

PHASE 1 – ABOU QIR to MISR STATION. VERTICAL PROFILE AND STATION TYPES

Which focused on describing the current situation of the railway corridor and its compatibility with the project's land needs.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>undertaken, as well as consultation with affected populations to develop and verify the findings.</p>	<p>vulnerability, types and nature of impacts.</p>	<p>Assessment Committee identifies the properties affected by a project, as well as confirming the location and legal status of affected properties with a property owner.</p>		<p>owners’ names have not been issued, the list of the depot landowners is expected to be issued in June 2022).</p> <p>An asset inventory of those with formal rights (business owners) and informal users (stationary informal vendors, mobile informal vendors) was carried out by NAT in October 2021. The census and asset inventory conducted by ENR as an update, and the final census compiled by the Compensation Committee in May 2022 to determine the expropriation for the Project.</p> <p>An initial reconnaissance of the Project impacted area was undertaken in April 2022 to identify impacted households and PAPs to inform the sampling approach to the household socio-economic surveys. The survey included an update to the ownership, quantity and quality of resources/assets which will be impacted by the Project, including: loss of access to housing (physical displacement); land, natural</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					resources and cultural resources (economic displacement).
<b>Resettlement and/or Livelihood Restoration Plan</b>	A RAP is required where land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unavoidable.	A RAP is required for projects leading to significant physical displacement, and a Livelihood Restoration Plan (LRP) is required for projects leading to economic displacement to improve, or at least restore, the incomes or livelihoods of affected persons. The LRP can be devised as a stand-alone document or incorporated in the RAP in cases where the project leads to both physical and economic displacement.	There is no requirement to prepare a formal RAP under Egyptian Law, nor to undertake any of the component activities of a RAP such as, a 'census', socio-economic survey, consultation with PAPs, monitoring or reporting. Moreover, there are no specific references in Egyptian Law to 'involuntary resettlement', nor any explicit consultation requirement.	There is no requirement under Egyptian Law to prepare a RAP. This is, however, a requirement by the Lenders.	This RAP has been prepared to bridge the gap between Egyptian national requirements and Lender's requirements. An additional RAP budget (RAP Fund) approved by a Ministerial Decree will be established to meet full replacement value and other costs needed to compensate informal users and provide livelihood assistance and support. The Entitlements Matrix in <b>Chapter 9: Entitlements and Compensation</b> describes the entitlements for eligible PAPs for this Project. <b>Chapter 10: Livelihood Restoration Plan</b> contains the measures for NAT to develop a Livelihood Restoration Programme, providing assistance to those PAPs who will be economically displaced because of the Project.
Replacement Cost	Compensation paid to PAPs must meet full replacement value.	Compensation paid to PAPs must meet full replacement value.	Under Egyptian Law, replacement costs are already	There is no replacement costs paid to formal tenants and	This RAP has been prepared to provide compensation to full replacement cost formal

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
			included in the compensation for the formal landowners only.	informal users of land and structures.	tenants and informal users of land and structures, in addition to legal landowners.
<b>Eligibility and cut-off date</b>	Eligible persons may be classified as persons: (i) who have formal legal rights to the land (including customary and traditional rights recognised under national laws); (ii) who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws; or (iii) who have no recognisable legal right or claim to the land they occupy. All those persons must be registered before the cut-off date to be eligible.	All displaced persons are eligible for certain types of mitigation measures. They may be classified as: a) Persons with formal legal rights to land or assets (including customary and traditional rights recognised under national laws); b) Persons who do not have formal legal rights to land and/or assets, but who have claims to land or assets that are recognised or recognisable under national laws or customary and traditional rights; c) Persons who occupy/use the land and/or assets but have no recognisable legal rights or claim to it/them.	Under Egyptian Law, the only people and entities entitled to compensation are those with registered property rights – registered landowners, occupants, users and those with registered third-party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration.  Egyptian Law does not recognise the rights of squatters.  Although there is no cut-off date under the Egyptian laws, the date of publication of the land acquisition Ministerial Decree is considered a cut-off date for lands and real estate that officially is owned.  Egyptian laws also take into account the date of land valuation by the Valuation Committee headed by an official from the ESA.	Egyptian Law only provides compensation for the formal owners, occupants and users who have their land ownership and/or use registered, as part of the land acquisition process. There is no requirement to undertake a census to identify or compensate those who are not currently included in the official governmental land registry such as informal land users.  The date of the ministerial Decree for land acquisition is not aligned with Lender's requirements in terms of cut-off date.	A socio-economic survey was undertaken (in April/May 2022) in order to identify all formal and informal users and those who are not currently included in the official governmental land registry. This RAP will fully consider formal and informal users to bridge the gaps identified between Egyptian Law and Lender's requirements. All identified PAPs are categorised and listed in <b>Chapter 9: Entitlements and Compensation</b> .  According to the socio-economic survey methodology, the cut-off date will differ according to the various components of the Project. The cut-off date for all assets falling within ENR property, namely the rented shops, the mosques and the copper factory land is 19 November 2020 as defined in the ministerial decree for the depot land, as well as the decision issued on 29

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					<p>November 29 2021 for Bab Sharq and Sporting Stations. Whereas, the cut-off date for all informal mobile and stationary vendors is the date the Compensation Committee completes the inventory on 17 May 2022 within the scope of the Project alignment and outside.</p> <p>Should the duration between the cut-off date and the start of construction be prolonged then NAT is to consider each additional case on an individual basis. Refer to <b>Chapter 7: Land Acquisition Process and Principles</b> for further details.</p>
<p><b>Compensation for Loss of Land</b></p>	<p>Economically displaced persons will be compensated for such loss at full replacement value. Compensation at replacement cost is based on valuation at average market value, plus transaction costs and the cost of restoration to an equivalent potential as that of the affected asset.</p> <p>Preferred compensation is in-kind. Compensation is to be</p>	<p>In cases of economic displacement replacement land shall be of equivalent or higher quality and situated as close as possible to the original location or to the current place of residence. Full replacement cost is defined as a method of valuation that provides sufficient compensation for replacing assets and transaction costs.</p>	<p>Egyptian Law only provides cash compensation to persons with legal / recognisable rights and claims.</p> <p>The ASD is the responsible authority for evaluating the price of land.</p> <p>The valuation methodology for trees will be according to the price list issued by the Agricultural Directorate in Alexandria Governorate.</p>	<p>The Lenders require the following persons to be compensated, who would not receive compensation in accordance with Egyptian Law:</p> <p>Egyptian Law does not require displaced persons without legally recognisable claims to land, such as tenants and squatters on public land, to be compensated for their loss of use of land. In the case of trees, these are compensated.</p>	<p>An entitlement matrix was prepared for the Project, this table presents the eligible people, households and businesses that will be entitled to compensation and assistance. Those also without a legal right to land have been included in the entitlement matrix (presented in <b>Chapter 9: Entitlements and Compensation</b>), providing them with compensation.</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>provided before displacement or imposition of access restrictions.</p> <p>Measures should be incorporated to provide displaced people with legal assistance to enable them to complete administrative requirements prior to land acquisition and, if needed, to seek redress from the courts.</p> <p>Economically displaced persons who are without legally recognisable claims to land will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost. The Client is not required to compensate or assist opportunistic settlers who encroach on the Project area after the cut-off date for eligibility.</p>	<p>Legal and other remedies are available at all times.</p>	<p>The valuation of lands and assets will be estimated according to the prices prevailing at the time of the issuance of the Public Interest Decree plus (20%) twenty percent of the estimated value. The entity that requests the expropriation shall deposit the full compensation amount in an account (that generates revenue of the banks that the State wholly owns) under the name of the entity that conducts the expropriation procedures. This account is required to be set up within a period not exceeding three months from the issuance date of the Decree.</p>	<p>Although the amendments of Egyptian land acquisition law (Law 10/1990) through Law 24/2018. The scope of the Law has been expanded to include “right holders”, in addition to, formal owners however the definition of “right holders” in the context of this amendment remains unclear.</p> <p>There is no preference given to government-led in-kind compensation rather than cash compensation for PAPs. In addition, there is no livelihood restoration and/or transitional support provisioned in Egyptian Law.</p>	<p>Households using common land are included in the entitlement matrix (presented in <b>Chapter 9: Entitlements and Compensation</b>), providing them with compensation or assistance.</p> <p>A livelihood restoration programme will be developed by the Compensation Committee formed by representatives of ENR, Ministry of Finance and NAT, based on the livelihood restoration plan presented in <b>Chapter 10: Livelihood Restoration Plan</b>, and transitional support is included in the entitlement matrix (presented in <b>Chapter 9: Entitlements and Compensation</b>).</p> <p>NAT will seek in-kind compensation for PAPs as a preference to cash compensation<sup>11</sup>, where possible, as described in the</p>

<sup>11</sup> The articles of the law do not address a clear definition of the type of compensation (cash or similar alternatives). Compensation is issued in cash, but in some cases on other NAT projects funded by IFIs with similar expectation and requirements, alternatives have been considered.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
					entitlement matrix in <b>Chapter 9: Entitlements and compensations</b> and <b>Chapter 10: Livelihood Restoration Plan</b> .
<p><b>Compensation for Commercial Buildings and Secondary structures</b></p>	<p>Displaced persons must be offered choices among feasible resettlement options and be provided relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable.</p> <p>Replacement property (for example, agricultural or commercial sites) must be provided of equal or greater value, or cash compensation at full replacement cost where appropriate.</p> <p>Alternative housing and/or cash compensation will be made available prior to relocation.</p> <p>Choice of replacement property of equal or higher value, or cash compensation at full replacement value where appropriate.</p>	<p>Displaced persons must be offered choices among feasible resettlement options.</p> <p>For persons who occupy/use the land and/or assets but have no recognisable legal rights or claim to it/them, the promoter shall provide arrangements to allow them to obtain adequate housing and pursue security of tenure.</p> <p>Where cash compensation is offered, the valuation of all affected assets shall be at the full replacement cost.</p> <p>Where tenants are being displaced, arrangements shall be put in place to help them secure alternative locations.</p> <p>As required, the promoter shall also provide resettlement assistance suited to the needs of each group of displaced persons, paying particular attention to vulnerable PAPs</p>	<p>Compensation for property loss is calculated according to the price determined at the time of assessment by a delegated Valuation Committee comprising representatives from the governorate office of ESA (ASD) and the head of the Valuation Department at the ESA as lead of the Valuation Committee and joined by the Directorate of Housing and Utilities and Directorate of Real Estate Taxes in the relevant governorate.</p> <p>Compensation at replacement value and asset value increases are not accounted for by Egyptian Law. Compensation is calculated at the market value in the area.</p> <p>There is no requirement to find land replacement.</p>	<p>Valuation gaps exist for buildings, i.e. Egyptian requirements do not compensate based on full replacement cost nor does it consider rebuilding cost (workers, utilities, etc.) or additional allowances (e.g. moving support, legal fees, etc).</p> <p>No preference is given in Egyptian Law to government-led in-kind compensation rather than cash compensation for legally owned commercial buildings and secondary structures. There are no informal users that own/occupy illegal buildings and/or structures on the government land or the other private land parcels.</p>	<p>The Project will establish a RAP fund (further details provided in <b>Chapter 7: land Acquisition Process and Principles</b>) to compensate for the gap between full replacement cost (including legal and transitional allowances) and depreciated building values. The additional compensation to reach replacement value will be calculated by the Compensation Committee</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
		and/or groups. Resettlement assistance can consist of legal assistance, moving allowances or other forms of support to be determined in consultation with the PAPs.			
<b>Addressing Loss of Livelihoods</b>	<p>Livelihoods affected by EBRD-financed projects should be restored. This could involve the replacement and/or restoration of lost land and structures as well as access to these assets.</p> <p>In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living.</p> <p>Economically displaced persons will be compensated for loss of assets or access to assets prior to displacement.</p> <p>Additional targeted assistance (for example, credit facilities, training or</p>	<p>Where the PAPs' livelihood is land-based or the land is collectively owned, the promoter shall favour land-for-land compensation.</p> <p>Where a community's commonly held resources are affected, measures shall be implemented to allow continued access to the affected resources or to provide access to equivalent resources.</p> <p>In the case of cash compensation for all affected assets, the valuation shall be at the full replacement cost.</p> <p>In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected shall also be provided with targeted assistance and transitional support to at least restore their</p>	<p>Valuation of agricultural land, trees, etc. is based on the price list issued by the Agricultural Directorate in Alexandria governorate and will consider additional factors that may have an impact on the immovable asset.</p> <p>Egyptian Law does not assess loss of livelihoods, compensation is provided to titleholders for land loss only.</p>	<p>The Lenders requirements specify that all PAPs must be granted the right of compensation which will enable them to restore their means of livelihood at least to the levels prior to the Project.</p> <p>Egyptian Law does not make provision of livelihood loss or assessment of individual livelihood impacts. Only legal asset owners can receive compensation.</p>	<p>Measures to address the need to compensate loss of livelihoods, are set out in the entitlement matrix (presented within <b>Chapter 9: Entitlements and compensation</b>) and <b>Chapter 10: Livelihood Restoration Plan</b>.</p>

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	<p>employment opportunities) and opportunities to restore livelihoods must be provided, and where possible improvements to their income earning capacity, production levels and standards of living.</p>	<p>livelihoods. The transitional support can consist of cash, job opportunities, training, legal assistance or other forms of support to be determined in consultation with the PAPs.</p> <p>In cases of commercial structures, the compensation of the affected business-owner shall also consider the cost of re-establishing commercial activities elsewhere, and the cost of transferring and reinstalling any equipment, as applicable. Affected employees shall receive assistance for temporary loss of wages and, if necessary, assistance in identifying alternative employment opportunities.</p>			
<p><b>Compensation Prior to Land Take / Displacement</b></p>	<p>Displacement or restriction of access does not occur before necessary measures for resettlement are in place.</p>	<p>In the case of cash compensation, the promoter shall make the payment before the actual resettlement takes place in order to allow PAPs to find a suitable replacement. The promoter shall pay due attention to the local context and personal considerations in order to select, in accordance with the affected person, the most appropriate payment</p>	<p>According to Expropriation Law, compensation needs to be deposited into titleholders account prior to land take.</p>	<p>No gaps identified.</p>	<p>No measures required (Lenders' Requirements and National Requirements align). However, the land cannot be entered without compensation being paid to the PAP.</p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
		method (i.e. cheque, bank transfer, cash, etc.).			
<b>Selection of Resettlement Sites</b>	<p>In line with wider resettlement principles, new resettlement sites built for displaced persons will offer, at a minimum, pre-displacement living conditions and where achievable, sustainable and cost-effective opportunities to improve the standard of living.</p> <p>Adequate housing or shelter can be measured by quality, safety, affordability, habitability, cultural appropriateness, accessibility and locational characteristics. Adequate housing should allow access to employment options, markets, and basic infrastructure and services, such as water, electricity, sanitation, health care and education.</p> <p>Clients should include these aspects of adequate housing in the selection of resettlement sites in order to offer improved living</p>	<p>As a minimum, relocation sites need to fulfil the certain conditions, including that they are not under threat of eviction; they are not on land used by communities which have been displaced as a result of violence or conflict; they are available and have the capacity to absorb the influx of resettled persons at acceptable density levels; and they include measures to mitigate the impact on the host communities, including consultations with host communities and local governments.</p>	<p>Land acquired by expropriation can only be compensated by cash compensation according to Egyptian Law.</p> <p>Host communities (areas where physically displaced PAPs are resettled) are not considered or evaluated under national legislation.</p>	<p>Egyptian Law does not provide regulation or guidance on selection of resettlement sites and therefore does not meet Lender's requirements and standards.</p> <p>Principles of compensation for resettlement to be applied are included in <b>Chapter 8: Entitlements and compensations.</b></p>	<p>Measures to support physically displaced households, including: minimum living standards and building quality; support in finding suitable housing; transaction costs etc, have been included in the entitlement matrix (presented in <b>Chapter 9: Entitlements and compensations</b>) and <b>Chapter 10: Livelihood Restoration Plan.</b></p>

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	conditions, particularly to those without recognisable legal right or claim to the land they occupy.				
<b>Negotiated Settlement (Mutual Agreement)</b>	Clients are encouraged to acquire land rights through negotiated settlements even if they have the legal means to gain access to the land without the consent of the seller. Negotiated settlements can usually be achieved by providing fair and appropriate compensation and other incentives or benefits to affected persons or communities, and by mitigating the risks of asymmetry of information and bargaining power.		Egyptian Law does not contain articles emphasizing that negotiated settlements are required in the first place before resorting to expropriation.	Egyptian Law does not provide regulation or guidance on negotiated settlements and therefore does not meet Lender's requirements and standards.	NAT has formed a Compensation Committee to negotiate with the affected shop tenants and informal economic activities.  <b>Chapter 8: Institutional Arrangements</b> includes a description of the roles and responsibilities of the Compensation Committee.
<b>Measures for Vulnerable Persons</b>	The resettlement process and livelihood planning should provide special assistance to women, minorities or vulnerable groups.	During the resettlement consultation, planning and implementation process, the promoter shall give special consideration to individuals and groups that are vulnerable, marginalised, systematically discriminated against or excluded on the basis of their socioeconomic characteristics.	Egyptian Law on expropriation does not include requirements for engaging with vulnerable groups or providing additional compensation.	Egyptian Law on land acquisition does not address vulnerable groups. The Lenders require additional measures for these groups.	Key vulnerable populations were identified as part of the socio-economic survey.  Measures to address the specific needs of these vulnerable groups have been included in the entitlement matrix. The household survey results are presented in <b>Chapter 5: Affected People and</b>

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					<b>Assets</b> and the entitlements matrix in <b>Chapter 9: Entitlements and compensation.</b>
<b>Monitoring and Evaluation</b>	Monitoring and evaluation is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	A monitoring system (i.e. resources, staff, and procedures) must be set-up commensurate to the scale of the resettlement and the risks involved. The promoter shall submit to the EIB monitoring reports as part of its reporting requirements. In the case of significant involuntary resettlement impacts, the promoter shall be required to engage an external party to conduct monitoring or a mid-term resettlement review / audit.	There are no provisions for monitoring the implementation or impacts of expropriation or resettlement in Egyptian Law.	There are no provisions for monitoring the implementation or impacts of expropriation or resettlement in Egyptian Law.  The Lenders requirements specify the need for monitoring and evaluation of resettlement and livelihood restoration.	NAT has not yet established a monitoring mechanism in relation to their expropriation and likelihood restoration activities.  A monitoring mechanism has been developed in this RAP as described in <b>Chapter 12: Monitoring and Reporting</b> , and both will be implemented by NAT. In addition, NAT will prepare a dedicated RAP Monitoring and Evaluation Plan.
<b>Level and timing of Community Engagement / Consultation / Negotiation / Participation</b>	EBRD emphasises early and meaningful consultations, and preparation of a SEP. The Project should consult with PAPs about the project's environmental and social aspects and should take their views into account.  Affected persons shall be given the opportunity to participate in the eligibility	The promoter shall identify and meaningfully engage with all PAPs, both men and women, host communities and other relevant stakeholders regularly throughout resettlement planning, implementation, monitoring and evaluation.  The promoter shall inform PAPs about their options and rights pertaining to resettlement. The	Engagement/ participation of Project-Affected People is accounted for in the national legislation but is limited to the publication of census results and the compensation amounts in the municipality for a two-week period from the date of publication during which individuals can object and present claims. An owner of a	Egyptian Law does not require early or on-going consultation with PAPs or communities. The Lenders require provisions to ensure effective community engagement through disclosure of Project-related information and consultation with local communities on matters that directly affect them according to Lenders requirements.	A number of initial consultation activities were carried out during the development of the Resettlement Framework, and further consultation was undertaken during the preparation of the <b>RAP</b> (See <b>Chapter 11: Information Disclosure and Consultations</b> ).  Although the Project has acquired the right to

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	<p>requirements, negotiation of the compensation packages, resettlement assistance, suitability of proposed resettlement sites and proposed timing. Consultation activities will continue during the implementation, monitoring and evaluation of compensation payment and resettlement. The Client should consult the affected people on land acquisition; resettlement and livelihood related issues; and disclose relevant documents at various stages of the project. Consultations should be meaningful and inclusive allowing for the participation of all groups and segments of affected people.</p>	<p>promoter shall disclose all relevant information in a timely and context-specific manner, in an accessible place, and in a form and language(s) understandable to PAPs.</p>	<p>property to be expropriated is informed via an official letter and requested to attend “confirmation of a property”.</p> <p>The owner’s right for compensation is addressed in Article 26: Law No. 577 of 1954. However, the rapidity of these procedures should not prevent the owners and concerned persons from claiming and ensuring their rights<sup>12</sup>. PAPs have the right to receive the compensation that estimated by the Survey Directorate and can object to the compensation value within the specified period (15 days) according to the law.</p> <p>There is no clear requirement to consult or seek participation of communities before the start of land acquisition.</p>	<p>The expropriation process involves notification of the landowners, but no social studies, surveys and consultations are required prior to land acquisition.</p> <p>There is no requirement for a Stakeholder Engagement Plan (SEP) in Egyptian Law.</p>	<p>expropriate land where needed, NAT will seek to establish negotiated settlements with both formal and informal PAPs through ongoing transparent communication which will be duly documented as part of RAP implementation and monitoring. Where this is not possible, the compensation principles in the RAP will still be followed, e.g. payment made to PAPs prior to land entry.</p> <p>This RAP (specifically the grievance mechanism) provides Lender’s compliant engagement actions for NAT to follow during the implementation of the RAP.</p>

<sup>12</sup> Accordingly, the regulator has distinguished two different redress mechanisms:

- For compensations not related to the compensation assessment: Such as those pertaining to the actual right of the expropriation. In this case, the authority in charge of the expropriation process shall be responsible for investigating these disputes in order to pay the due compensation value (Article 11: Law No. 11 of 1954 and Law No. 11 of 1956).
- Disputes over the compensation assessment: These disputes are subject to legal jurisdiction as follows: The authority in charge of the expropriation procedures shall refer the disputes over the compensation assessment submitted to court. The court shall examine the complaint quickly and its judgment shall be conclusive.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
			<p>Consultation requirements are limited to what is stated in the EEAA guidelines regarding consultation during the preparation of the EIA (Scoping consultation activities with the concerned authorities, as well as holding a public consultation session)<sup>13</sup>.</p> <p>No social studies, surveys or consultations are required prior to land acquisition.</p>		
<b>Gender</b>	<p>EBRD's ESP (2014) addresses gender-differentiated aspects of impacts and opportunities, as well as gender-responsive consultation processes. The use of land and natural resources affected by the Project should be assessed in gender inclusive manner and specifically consider women's role in the management and use of these resources.</p>	<p>The promoter shall pay attention to the specific gender dimensions of involuntary resettlement, especially regarding stakeholder engagement, the census, valuations, payment of compensation and income restoration. The promoter shall put in place specific measures as necessary so that women's perspectives and interests are considered in all aspects of resettlement planning and implementation. The promoter</p>	<p>There are no cultural norms or legal texts that prohibit land ownership for women.</p> <p>Women have equal rights to property as men.</p>	<p>Egyptian Law does not require gender responsive consultation, or the identification of gender specific risks and opportunities. This is required by the Lenders.</p>	<p>The consultation undertaken for the Project captured both men's and women's views through community and women-only focus groups, as defined in the <b>Stakeholder Engagement Plan (SEP)</b>. The measures in the <b>SEP</b> will ensure this continues throughout the Project.</p> <p>The ASD issues lists of landowners according to the actual owner, whether he/ she is a man or a woman. Both</p>

<sup>13</sup> 3 public sessions were held for the Abu Qir Metro project, in addition to the consultation activities the community during the preparation of the ESIA. During the preparation of the RAP, FGDs were held with the tenants of the shops adjacent to the metro track and the women in the residential buildings near the track.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
		shall consider feasible measures for women to gain security of tenure and receive cash or in-kind compensation on equal terms as men.			<p>have the right to compensation in accordance with the law. The Compensation Committee will ensure that compensation payments and payment methods for shops tenants and informal economic activities inside the railway corridor are arranged in the names of both spouses or the male and female heads of households. This is covered within the entitlements matrix presented within <b>Chapter 9: Entitlements and Compensation</b>).</p> <p>Both male and female preferences and considerations in livelihood restoration; choice of resettlement options (if applicable) will be assessed.</p>
<b>Project-level Grievance</b>	Where there are Affected Communities, the Client will establish a grievance	The promoter shall establish a grievance mechanism consistent with the	Egyptian Law allows the creation of "Specialized Committees" <sup>14</sup> to address	There is a generic grievance mechanism for all government projects, which enables all	A Project-specific grievance mechanism has been developed by NAT and included

<sup>14</sup> The current Egyptian laws and regulation stated that the concerned owners and right holders have the right, within 15 days from the date of posting and publishing the lists and information of the expropriated properties, to object to the information contained in such lists. The objection is made to the main offices of the Expropriating Entity or the administration to which it is attached within the governorate in which the property is located. In case of dispute between several individuals or parties on a single property, each party should present all evidence or documents that proof his/her rights within the next 90 days from submitting the memorandum of objection/ grievance. In case of failing to submit those

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
<b>Redress Mechanisms</b>	<p>mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the Client's environmental and social performance.</p> <p>The Client will establish an effective grievance mechanism as early as possible in the process, consistent with the objectives and principles of PR10 in order to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities. It will include a recourse mechanism designed to</p>	<p>requirements set out in Standard 2 as early as possible. The mechanism shall be socially appropriate and readily accessible, regardless of gender or any other socioeconomic characteristics.</p> <p>The mechanism shall promptly address concerns and grievances related to the involuntary resettlement process (such as entitlements, access to information, compensation or relocation) raised by PAPs, host communities or others. Additionally, the mechanism shall include a recourse procedure to resolve any disputes in an impartial manner. The mechanism should not impede access to</p>	<p>grievances originating from misunderstandings of Project policy or resulting from conflicts among neighbours.</p> <p>The Egyptian legal framework contains a two-step grievance redress process:</p> <p>1) A property owner is entitled to submit a grievance related to information regarding the concerned property such as legal status for 15 days after its announcement. A Project representative or governorate office are the contact window and focal point of such grievance.</p> <p>2) The property owner and project proponent are entitled to submit a grievance related to the assessment result at the first instance court in a</p>	<p>citizens to file complaints, comments and/or recommendations; where any grievance can be filed through the e-Government Complaints Portal, Citizens Complaints Office at the Alexandria Governorate Headquarters and Districts.</p> <p>Court cases in Egypt are known to require long periods of time before settlements can be reached. With intent to address the lengthy time the Egyptian court may require to process and resolve disputes<sup>16</sup>.</p>	<p>in this RAP for NAT implementation.</p> <p>NAT has a current mechanism for grievances, the mechanism includes multiple channels for receiving grievances, and NAT receives written grievances for those whose owners come to submit them themselves. In addition, there is a dedicated email address for the Project (<a href="mailto:alexandriametro.nat@yahoo.com">alexandriametro.nat@yahoo.com</a>) that can be used to raise complaints/ comments/ recommendations.</p> <p>NAT will have to follow up on all complaints related to the Project, which can be submitted through other channels such as the e-Government Complaints Portal, Citizens Complaints Office at</p>

required evidence, the grievance would be considered as not submitted. The responsible body for expropriation has the right to request additional documents deemed necessary and define proper period for submitting these documents.

<sup>16</sup> The PAP has the right to file his complaint to NAT but the court is the official channel for filing an objection in relation to the compensation value, which gives the PAPs the right to re-evaluation in accordance with the law.

Topic / Issue	EBRD Requirements	EIB Requirements	National Requirements	Gaps Identified	Measures to close gaps
	<p>resolve disputes in an impartial manner.</p>	<p>the country's judicial or administrative remedies.</p>	<p>governorate where the acquisition will be conducted.</p> <p>The law also allows one month (15 days) to object to the decision of resettlement, four months to seek redress to the compensation value and three months in case of dispute between several individuals or parties on a single property. A list of properties for which no objection or appeal is made shall be prepared. No objection or dispute may thereafter arise with respect to these particular properties. Payment made to the owners and holders of rights in these properties shall be conclusive as to the fulfillment of the Expropriating Entity's payment obligations.<sup>15</sup></p>		<p>the Alexandria Governorate Headquarters and Districts.</p> <p>Refer to Project <b>SEP</b> and <b>Chapter 10: Information Disclosure And Consultations</b> for further details.</p>

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<sup>15</sup> No objection or appeal shall prevent the property owner or holder of rights therein from collecting the estimated compensation amount.

## 4. RAP METHODOLOGY

### 4.1 Approach to Land Acquisition and Resettlement

The RAP is founded on the data and information retrieved during the key steps listed below.

- **Census** aims to identify all those eligible for compensation and other forms of assistance resulting from the Project's need to acquire land.
- **Asset inventory** is carried out to identify all land and assets in the project area at the time of the cut-off date that need to be acquired by the project.
- **Socio-economic survey** aims to determine and analyse the socio-economic conditions of individuals, households, and businesses (formal or informal) which will be physically and economically displaced by the Project.
- **Site visits** carried out to collect information on the shops and residential areas adjacent to the alignment.
- **Key Informant Interviews.**
- **Focus Group discussions.**
- **Valuation of affected assets** focuses on identifying the value placed on an asset for the purpose of calculating compensation.
- Legislative review is carried out to identify applicable national laws and regulations, that are related to and set out provisions on land acquisition, resettlement, and livelihood restoration. The review also includes a gap analysis that aims to identify any gaps between national legislation and standards/requirements of Lender's involved in the Project. The legislative review will form the legal basis and mechanisms for entitlements.

### 4.2 Objectives

The objectives of the socio-economic survey for the Alexandria Metro Project are as follows:

1. Collect baseline socioeconomic data of the Project-affected land parcels, shops and businesses, in addition to the households (if relevant), helping to identify and evaluate the E&S impacts, risks and opportunities of the Project in order to develop mitigation measures;
2. To identify and examine the ownership, quantity and quality of impacted immovables and livelihoods related to the Project, including: loss of access to businesses, housing, local services (where relevant);
3. To inform the suitable design of the Resettlement Action Plan (RAP) (including livelihood restoration aspects);

4. To provide a pre-Project socio-economic and community perception baseline about the Project and monitoring indicators in order to track the progress and to determine whether businesses (shops, kiosks and vendors) and possibly households' wellbeing has been maintained and enhanced; and
5. To gather gender-related data and perceptions within the affected businesses (shops, kiosks and vendors) and possibly households in order to mitigate against gender-specific impacts and identify opportunities for women within the RAP.

This socio-economic survey sought to record information for all economically impacted businesses and possibly impacted households, as well as a sample of shops located adjacent or close to the alignment who may still be significantly affected by the Project activities. The corridor for the main alignment of the metro line differs between 13 to 30 metres in width.

#### 4.2.1 Equipment and Tools Used to Collect Data

Data collection tools – the questionnaires developed were compatible for tablet data entry, as well as hard copy printing and manual completion. The surveyors were given the choice as to which is preferable for them. Most surveyors preferred using a hard copy after translating the questionnaires into Arabic, the questionnaires were reviewed by the RAP Team supervisor after their completion during the fieldwork to ensure they were applied correctly and had no gaps. SPSS was used for data entry and analysis by the RAP team.

Cameras – when surveys are completed face-to-face with vendors in stations and shops adjacent to the alignment, the surveyors were provided with cameras in order to photograph and geo-tag affected assets.

IT equipment – the survey team possessed their own laptops/computers and the necessary software to carry out data entry, collation and analysis.

Georeferencing equipment – surveyors were provided with GPS devices in order to establish the exact location of households and assets within the expropriation corridor.

PPE and safety equipment – in order to combat against COVID-19 and the risk of infection, surveyors were provided with hand sanitiser and face masks. They were also required to wear suitable walking shoes, sunhats and sunscreen, and provided with water and high-visibility clothing. Risk assessments were carried out by the RAP team prior to survey commencement and updated where necessary throughout.

#### 4.2.2 Number / Experience of Surveyors

The RAP team comprised 2 sub-teams (2 surveyors per sub-team) and were directed by Dr Anan Mohamed.

## 4.3 Socio-Economic Survey Methodology

### 4.3.1 Desk Study

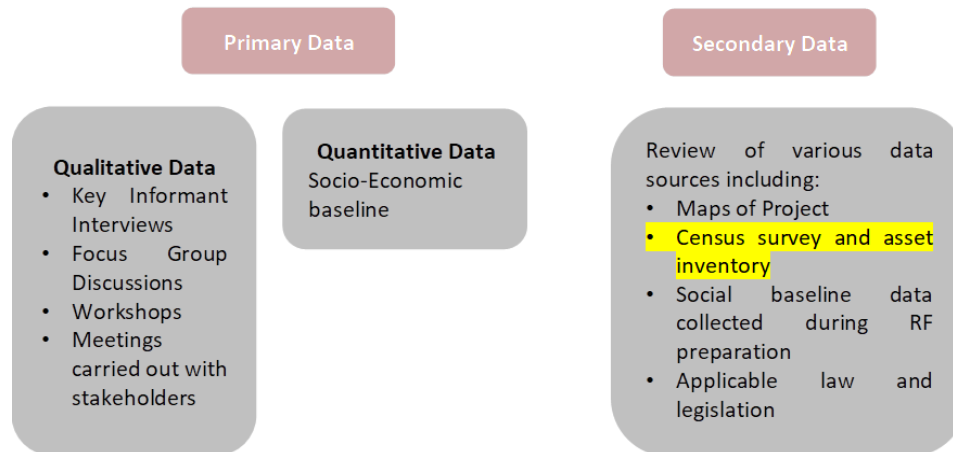
The socio-economic survey methodology developed for the Alexandria Metro Project is based on the information gathered from primary and secondary data sources. The survey methodology focuses on information made readily available at the time of RAP preparation with the effort of including all impact groups known into the scope.

Primary data was generated through a socio-economic survey and in-depth/key informant interviews carried out with PAPs, businesses and other stakeholders such as public agencies influential to the land acquisition process as well as community-based organizations, business associations, community leaders and other key local actors. Primary data was also informed by the workshops carried out with government officials during RAP preparation and focus group discussions held with PAPs e.g. tenants of shops, formal and informal vendors, and others impacted by the Project. Information collected through these tools (survey, in-depth/key interviews, workshops and focus groups) were analysed to generate social and economic data of the affected community members.

Secondary data used included: maps showing project footprint; census survey and assets inventory data collected by ENR property department officials in Alexandria during the PAPs inventory (October 2021); information gathered during resettlement framework preparation (2021); applicable law and legislation; other documentation related to land acquisition process; impacted groups which were provided by NAT, MoT, ENR; and other information gathered from reliable web-based sources. This would include information on shops owned by ENR in the existing stations, informal mobile vendors within the alignment, locations of the businesses/shops adjacent to the alignment (KMZ file showed general shop locations as shaded block locations with no specific indication of numbers) that may potentially be impacted by the Project. As of 5<sup>th</sup> April 2022, specific information on the number of landowners<sup>17</sup> and assets impacted within the depot land and two new stations (Bab Sharq and Sporting) and details that include the number and type of shops adjacent to the alignment are not available and still under preparation.

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<sup>17</sup> The information received including limited information on the number of landowners. It only covers the landowners of the depot land, which includes El Nahas Company (affiliated the Ministry of Business Sector), the heirs of the Buhairi family (without specifying a number or names), and the heirs of the Gawish family (without specifying a number or names).



Information collected both from primary and secondary data sources was used to formulate a phased approach in collecting socio-economic baseline data. In this respect, the survey consists of the following phases:

#### 4.3.2 Phase 1:

Conducting surveys with groups that include:

- Tenants of kiosks and cafeterias (owned by ENR) located within the current stations along the alignment (8 tenants);
- Informal users within the alignment (6 informal mobile vendors);
- Mosques impacted by project activities (13 mosques); and
- Other mobile businesses within the alignment (15 Stationary informal vendors).

#### 4.3.3 Phase 2:

Gathering information for phase 2, includes:

- Walk of site to determine types and number of shops adjacent to the alignment;
- Assessment of potential impacts on residential buildings and other social receptors along the alignment; and
- Identification of any other vulnerable groups along the alignment (if any).

After data was gathered during Phase 1, the RAP team conducted surveys with groups as part of Phase 2 as follows:

- Owners of private lands within the newly added Bab Sharq and Sporting Stations (the site walkover in March 2022 confirmed there are no users of land for this site<sup>18</sup>);
- Owners of private lands within the depot land (the walk of site in March 2022 confirmed there are no users of land for this site);
- Owners of shops outside/adjacent to the rail alignment from Victoria Station to Mandara (a sample of shops likely to be significantly affected to be surveyed); and
- Residential areas along the alignment (that may potentially be impacted) – informed by Phase 1.

The socio-economic survey was carried out through face-to-face meetings with relevant PAPs.

In the proposed RAP development schedule, time has been allocated for survey preparation to ensure the full understanding of the methodology with the survey team. This includes the overall objectives and steps to promote the successful and efficient completion of the questionnaires.

The RAP team has prepared several questionnaires for each impact group that has been identified for the survey. The questionnaires aim to collect data on:

- The use of impacted land/immovable (through ownership, tenancy arrangements or informal use) including any activities carried out;
- Number and type of users that benefit from the land/immovable (owners, tenants, employees, informal users, vulnerable);
- Information on users such as demographics, socio-economic status, livelihood and income sources, means of transport and access to land/immovable impacted;
- Any vulnerabilities that may be multiplied by Project activities; and
- Level of awareness, perceptions and knowledge of the Project (including communications channels available and GRM).

NAT sent an official letter to Alexandria Governorate to communicate survey that the RAP Team would be conducting the socio-economic survey work from the week commencing April 17, 2022.

Key tasks in Socio-economic Survey – The following process was followed:

#### *Face-to-face Socio-economic Survey*



**Identifying informal users** – The RAP team was aware that there could be significant users who have not yet been identified in the previously undertaken RF and other information provided up to date from NAT

<sup>18</sup> Except for the economic activity of car wash on the Bab Sharq land parcels. The land was observed to be used as open air car park, with a corner occupied by a car wash. **(Not Included in the methodology previously submitted)**

for the preparation of the RAP. These users (if any) were identified during the site visit conducted along the alignment, and during the socio-economic survey.

In cases where a single shop is rented from ENR to a company owned by multiple parties, the lead party completed the survey. Additionally, where any of the shop vendors have employees, a separate employee survey was carried out. The survey(s) identified all beneficiaries and those with income generating activities related to these businesses. The entitlement matrix included measures for all impact groups.

### **Data Recording**

Survey questionnaire – Questionnaire templates for identified impact groups were developed based on RAP team experience in designing and conducting socio-economic surveys in line with EBRD's Resettlement Guidance and Good Practise Handbook and best international practice.

The survey team made use of encryption tools and procedures relating to data collection for the Project as part of the technical and organizational security measures. It was ensured that personnel gathering and processing personal data were suitably informed, trained, and instructed in respect of Data Protection Legislation as well as obliged in writing to adhere to data privacy regulations under Data Protection Legislation and committed themselves in writing to confidentiality.

The survey team appointed a data protection officer in the Project implementation process, and provided a code for each questionnaire by NAT. This ensured that the survey team was not in possession of any name information for the PAPs. All questionnaire information was saved into the database under this code. The surveyors did not take the name of the PAPs, just their codes and only data linked to codes, and not names, were stored.

The survey team used an encrypted data storage system for this Project. All the questionnaires were available in this system.

Contact information for the survey team was provided to the survey respondents, in the event that respondents wanted to ask any questions after the survey was completed. Any concerns/feedback of participants were recorded and addressed.

Entry, filing and analysis – The RAP Team ensured that all questionnaires were properly filled out, inserted into the database matrix, and filed by surveyors through daily meetings and reviews. The RAP team had real-time access to this database and provided comments on data entry if required. Further, surveyed impact groups were clearly marked on the database (including the identity of their surveyor) to ensure no double-counting and to reduce the potential for speculative claims.

The RAP team carried out a daily verification protocol on the data gathered, identifying outliers (e.g. numbers that are clearly out of range) and following up with the relevant surveyors. This ensured that the surveyors are properly collecting and entering the data, ensuring proper understanding of the process and avoiding systematic errors.

### Risks and Mitigation Strategies

The RAP team identified a number of potential challenges in carrying out the above methodology. Below is a list of these risks, as well as their proposed mitigation strategies:

Potential Risk to the Survey	Mitigation Measures
<b>Not all shop vendors may be present at the time of the survey.</b>	Contact details for the shop vendor were obtained and followed up to arrange a suitable date and time for questionnaire to be completed within the planned timeframe.
<b>Mobile vendors outside the stations within the alignment may not always be present.</b>	The phased approach adopted allowed for the survey team to visit the site twice to collect this information. Where mobile vendors were found at the time of the survey, mobile vendors and surrounding shop vendors present were consulted by the RAP team to gain information on mobile vendors that were not be operating on site on that particular day.
<b>PAPs may refuse to take part in the survey due to the request for personal information, or that women may feel uncomfortable talking to surveyors.</b>	The survey team highlighted to the PAPs the necessity of carrying out the survey, in order for them to be eligible for compensation. Confidentiality of all information was assured by the RAP team, and the letter of permission from NAT was shown. There was also 2 female surveyors in the RAP Team for any female PAPs who would prefer speaking to a female.

#### 4.3.4 Methodology for Selecting a Sample of Shops and Houses outside and adjacent to the Project Alignment

##### Shops Sample

The shops adjacent to the Project corridor are located in the following station areas: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and to El Montazah. These are the areas in which the Alexandria Metro alignment will be elevated (i.e. the viaduct area).

The RAP Team surveyed the shops/ buildings adjacent to the Project alignment through the most recent satellite data available (up to December 2021). The following table shows the results of the survey according to the areas between the stations.

**Table 4-1 Approximate numbers of shops/ buildings adjacent to the alignment**

N	Station/Segment	North/South	Number of Identified Shops <sup>19</sup>
1	Victoria Station – Mohamed Naguib Station	North Side	50 – 70

<sup>19</sup> Approximations made based on Google Satellite Hybrid and ESRI Satellite Geodata

N	Station/Segment	North/South	Number of Identified Shops <sup>19</sup>
2	Victoria Station – Mohamed Naguib Station	South Side	10 – 15
3	Mohamed Naguib – Sidi Bishr Station	North Side	65 – 85
4	Mohamed Naguib – Sidi Bishr Station	South Side	8 – 13
5	Sidi Bishr Station (within its vicinity)	N/A	2-3
6	Sidi Bishr Station – Miami Station	South Side	11-17
7	Miami Station – Asafra Station	South Side	15-20
8	Asafra Station (within its vicinity)	N/A	5-10
9	Asafra Station – El Mandara Station	South Side	32-39
10	El Mandara Station to El Montazah	South Side	35-40

The above quantifications are for areas highlighted by a white Polygon in the most recent version of the Project alignment produced as a KMZ received from SYSTRA<sup>20</sup>. The structures have been defined as shops but they may not necessarily be shops as there is a possibility some of the identified spaces are workshops or storage areas (not possible to validate through satellite data).

According to the data of the previous table, the RAP Team drew a sample of 20% of the total maximum number of shops in each area, so that the total sample of the study from the shops is 62 shops distributed over the different regions according to the following table.

**Table 4-2 Distribution of the study sample from shops**

N	Station/Segment	Maximum Number of Shops	20% of the Max
1	Victoria Station – Mohamed Naguib Station	70	16
2	Victoria Station – Mohamed Naguib Station	15	3
3	Mohamed Naguib – Sidi Bishr Station	85	18

<sup>20</sup> NAT stated that the shops outside the railway track will not be affected by establishment of the Project. Meaning that the shops will not be removed, and in the event that the Alexandria Metro Project design in any section will affect the shops, NAT will work with the consultant (SYSTRA) to change the design in order to conform to the principle of not removing the shops due to the Project. Accordingly, SYSTRA identified the areas of the shops located adjacent to the Alexandria Metro corridor, which may be affected during the construction period.

N	Station/Segment	Maximum Number of Shops	20% of the Max
4	Mohamed Naguib – Sidi Bishr Station	13	2
5	Sidi Bishr Station (within its vicinity)	3	1
6	Sidi Bishr Station – Miami Station	17	3
7	Miami Station – Asafra Station	20	4
8	Asafra Station (within its vicinity)	10	2
9	Asafra Station – El Mandara Station	39	8
10	El Mandara Station to El Montazah	40	8
<b>Total</b>		<b>312</b>	<b>65</b>



**Shops in Miami area**



**Sidi Bishr area**

**Figure 4-1: Shops outside the railway track adjacent to the railway fence**

The RAP Team has taken into account the diversity in commercial activity of the shops that was included in the study sample.

**House Sample**

The Project route passes through the urban residential and commercial areas of Alexandria through four districts in Alexandria Governorate: Montazah Awal, Montazah Tany, Al Sharq, and Wasat, as illustrated in the following table.

**Table 4-3: Metro stations distribution according to the administrative division of Alexandria districts**

District	Stations
<b>Montazah Tany</b>	El Islah, El Maamoura, Toson, Abu Qir.
<b>Montazah Awal</b>	Mohamed Naguib (New), Sidi Bishr, Miami (New), El Asafra, El Mandara, El Montazah.
<b>Sharq</b>	Kafr Abdou (New), Al Zahiria, El Souqh, Ghebrial, Victoria.
<b>Wasat</b>	Alexandria/ Misr (New), Bab Sharq (New), El Hadra, Sporting (New), Sidi Gaber.

Some sections of the Alexandria Metro alignment are close to houses and may be affected by construction activities. It should be taken into account that the houses that are most likely to be affected by construction activities are the houses located in the areas in which the Project alignment will be elevated (the viaduct section), given that the construction work includes excavation, which may affect nearby buildings depending on the construction condition of the building.

According to the site visits conducted by SYSTRA during the preparation of the environmental and social studies for the Project, some areas in the viaduct section were identified as houses close to the Project alignment, which are: Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra.

The RAP Team selected 5 houses from each of the areas located at/between the aforementioned stations, according to how close they are to the route with a total sample of 40 houses.

The survey was applied to one apartment in each residential building. The following photos show the houses near the Project alignment in the viaduct section.







#### 4.4 Other Information

It should be noted that the information gathered in this socio-economic survey has been supported with information gathered from multiple focus groups to be undertaken, as well as consultation activities with relevant state authorities and other stakeholders such as NGOs.

Furthermore, the socio-economic baseline gathered from the survey (and used to develop monitoring indicators) was used in conjunction with existing primary and secondary data for the Project area. included official statistics, as well as liaison with the Ministry of Labour to determine vulnerable groups in the area.

## 5. AFFECTED PEOPLE AND ASSETS

### 5.1 Socio-Economic Background

The socio-economic baseline for PAPs described below is based on the results of socio-economic surveys, key informant interviews (KIIs) and focus group discussions (FGDs) conducted during April and May 2022. The following field activities were conducted to collate accurate socio-economic baseline information for this chapter:

- (32) **landowners** and their representatives were interviewed to collect data on the socio-economic characteristics of affected land users and owners (May 2022);
- Data collection on the socio-economic characteristics of **t(8) tenants of kiosks and cafeterias (owned by ENR) located within the current stations along the Project alignment** (business owners completed 100% of surveys);
- Data collection on the socio-economic characteristics of (21) the **informal users within the Project alignment**, including:
  - (15) Stationary informal vendors (business owners completed 100% of surveys);
  - (6) Informal mobile vendors (business owners completed 100% of surveys);
- Data collection on the socio-economic characteristics of the (sample of 65) **shops outside and adjacent to the Project corridor** (the business owners completed 98.5% of the surveys out of the total sample);
- Data collection on the socio-economic characteristics of the (sample of 40) **households outside and adjacent to the Project corridor** (the head of the household completed 55% of the surveys out of the total sample);
- **4 FGDs** were undertaken with the PAPs groups likely to be affected by the project, including:
  - 2 FGDs with tenants of the shops outside and adjacent to the train corridor to obtain their opinions about the Project and their concerns;
  - 2 FGDs with women-only focus groups to develop a greater understanding of gender-related issues within the surrounding Project area, potential impacts on women in affected communities and their views of the Project.

Community focus groups were conducted to understand the community's views on the Project.

- **Walk through of the route**, The RAP team conducted two rounds of walk throughs the train corridor, the existing stations, outside the train corridor in the adjacent streets parallel to the Project alignment. The first walk-through took place during the day (10 am - 4 pm), with the second round was during the evening (7 pm to 10 pm) on 17-24 April 2022. The aim of the two rounds of walk-through was to:

- Verify and update the PAPs inventory received from ENR;
  - Identify any other PAPs who were not counted;
  - Walk the Project alignment to determine types and number of shops adjacent to the alignment,
  - Identify the residential buildings adjacent to/ or closest to the Project alignment that may be affected by construction activities;
  - Identify any other vulnerable groups along the Project alignment (if any);
- RAP team conducted **KIIs** (March 2022) with government agencies responsible for land acquisition procedures and compensation valuation (the Egyptian Survey Authority (ESA) and Alexandria Survey Directorate (ASD)), in addition to, 2 active NGOs<sup>21</sup> in Alexandria. As well as the Directorate of Endowments in Alexandria (May 2022) and the Community Development Association in Alexandria (June 2022);
  - RAP team Visited **13 mosques** that will be removed as part of the Project and conducted a meeting with the Directorate of Endowments in Alexandria to find out what steps have been taken to date to compensate the mosques that will be removed; and
  - Updating the **assets inventory** conducted by the Egyptian National Railways (ENR) Property Department in Alexandria for shops located within the existing stations and the Informal users within the alignment.

The activities of stakeholder consultations conducted, FGDs with shops adjacent to the train corridor, and women-only focus groups were documented.

## 5.2 Administrative Structure and Population Characteristics

The proposed Alexandria Metro line passes through four districts of Alexandria Governorate, namely: Montazah Awal, Montazah Tany, Al Sharq, and Wasat, as illustrated in **Figure 5-1: Metro stations distribution map according to the administrative division of the Alexandria districts**. The Metro stations distribution along the Project alignment by district are presented in **Table 5-1** below.

**Table 5-1: Metro stations distribution according to the administrative division of Alexandria district**

District	Stations
Montazah Tany	El Islah, El Maamoura, Toson and Abou Qir.
Montazah Awal	Mohamed Naguib (New), Sidi Bishr, Miami (New), El Asafra, El Mandara and El Montazah.
Sharq	Kafr Abdou (New), Al Zahiria, El Souqh, Ghebrial and Victoria.

<sup>21</sup> Caritas and Young Men Christian Association (YMCA) NGOs.

District	Stations
Wasat	Alexandria/ Misr (New), Bab Sharq (New), El Hadra, Sporting (New) and Sidi Gaber.

The Mediterranean port city of Alexandria was developed on a narrow strip of land ranging from 1 to 5km in width, bordered by the Mediterranean Sea to the north, and by Lake Maryout to the south-east as well as agricultural land on the South-West. The eastern section of the city was initially developed, with expansion to the east and west to accommodate both residential and industrial needs. Today, the city stretches over 60 km along the Mediterranean coast.

The following is a description of the land use within the Project area according to the proposed segments of the metro line route and their respective administrative districts.

### Alexandria Regional Metro - Abou Qir

#### Project Districts

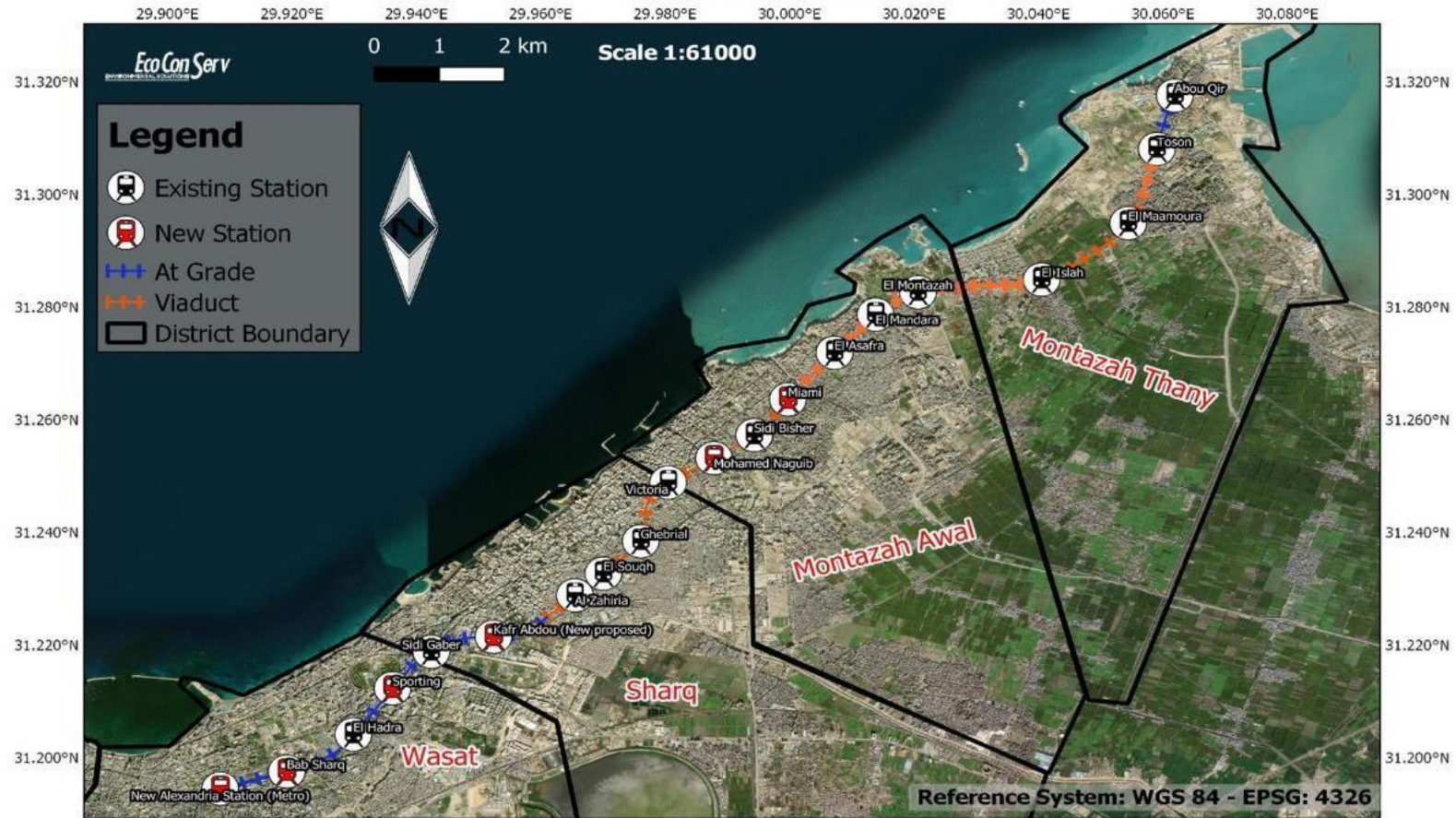









Figure 5-1: Metro stations distribution map according to the administrative division of the Alexandria districts


**Table 5-2: Socio-economic Characteristics of the Local Communities along the Project Alignment**

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
<p><b>Montazah Tany</b></p> <p><b>Approximate Chainage: 5.57km</b></p> <p><b>Distance from the Project Alignment: The distances in this segment vary from a minimum of 7m up to 30m between the Project alignment and the surrounding facilities in some areas.</b></p>	<p><b>(Abou Qir – Mamoura):</b> The proposed metro route, begins its journey at Abou Qir Station, making its way through Toson Station and El Maamoura Station in the Montaza Tany District. The Montaza Tany District is a 30 km urban District, southeast of the Alexandria Governorate by the coast. It is a hub for students due to the presence of the Arab Academy for Science and Technology for higher education and College of Physical Education for Boys, which are located to the south-west of Toson station. Additionally, numerous schools for pre-higher education learning such as the Brigadler School and Dream Language School are located west of the track between the Toson Station and El Mamoura, with the Shaheed Elementary School located east of El Maamoura. Beyond the educational facilities are numerous government services and facilities located in the district. This includes the Abou Qir Central Hospital west of the Project alignment between Abou Qir station and El Maamoura, the Abou Qir Health Insurance Hospital, as well as the Toson Health Insurance Hospital. Additionally, government services and buildings are present such as the Montaza Tany Police Station, in addition to, the offices of the Global Certification Bureau, Montaza Traffic Licenses Unit, Marine Officers Union and Drinking Water Mamoura Station located west of the Section A of the Project alignment.</p> <p>District Population:</p> <ul style="list-style-type: none"> <li>• Total Population: 541,430;</li> <li>• Male: 279,306;</li> <li>• Female: 262,124; and</li> <li>• Number of Households: 143,956.</li> </ul> <p>The part of the Project alignment located within the Montaza Tany District does not require any land acquisition for any private land parcels, it is limited to lands owned by ENR. Although this segment of the Project alignment is about 26% of the total Project alignment length, it is not the highest in terms of population density. This segment includes about 14.2% of informal users identified from the census, asset inventory and socio-economic survey within the Project alignment (3 Stationary informal vendors). There is only one cafeteria in the segment of the Project alignment at Abou Qir station.</p>	 <p><b>Figure 5-2: The cafeteria in Abou Qir Station.</b></p>  <p><b>Figure 5-3: The segment between Toson Station and Abou Qir Station.</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p data-bbox="1473 657 2110 715"><b>Figure 5-4: The segment between El Mamoorah Station to Al Montazah Station in the Montazah Awal district.</b></p>  <p data-bbox="1473 1121 2110 1179"><b>Figure 5-5: The segment between El Mamoorah Station to Al Islah Station.</b></p>



Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p data-bbox="1473 655 2107 715"><b>Figure 5-6: The segment between El Mamoura Station to Al Islah Station.</b></p>
<p data-bbox="62 756 241 780"><b>Montazah Awal</b></p> <p data-bbox="62 804 327 863"><b>Approximate Chainage: 5.19km</b></p> <p data-bbox="62 887 349 1171"><b>Distance from the Project Alignment: The distances in this segment of the Project alignment vary from a minimum of 10m up to 20m in some areas between the alignment and the surrounding facilities.</b></p>	<p data-bbox="385 756 1447 1011"><b>(El Montazah - Mohamed Naguib):</b> The Montaza Awal District, Alexandria’s most densely populated district, is home to numerous landmarks including the Montaza Palace and Montaza Garden, located east of the El Montazah Station. Additionally, to the west of the Project alignment, a variety of schools can be found, namely, the Egyptian Alexandria Academy, as well as the Kuwait School. The next station, El Mandara Station, provides a gateway to a variety of medical facilities (such as the Mandara Specialized Hospital to the west), the Mandara Water Company and Mandara Police Station to the east with the Alexandria Electricity Company located in the mid-western point between El Asafra and Sidi Bishr stations.</p> <p data-bbox="385 1035 1447 1259">The Asafra neighbourhood is located in this district comprising a densely populated informal neighbourhood where numerous vendors, coffee shops and kiosks operate. The Asafra neighbourhood includes the Manaret Alasfra Hospital west of El Asafra Station. The Montaza Social Affairs Office is located to the east of the Sidi Bishr Station,. The district is famous for its unique natural features, evident in its palm trees, flowers and public parks. The Project alignment follows the Mediterranean Sea, and curves along with the coast from Montazah District continuing on to Sharq District.</p> <p data-bbox="385 1283 600 1307">District Population:</p>	 <p data-bbox="1473 1174 2107 1233"><b>Figure 5-7: The segment between the new Miami Station and El Asafra Station.</b></p>


Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<ul style="list-style-type: none"> <li>• Total Population: 1,044,142;</li> <li>• Male: 505,428;</li> <li>• Female: 538,714; and</li> <li>• Number of Households: 267,792.</li> </ul> <p>The segment of the Project alignment located within the Montaza Awal District does not require land acquisition for any private land parcels, it is limited to lands owned by ENR. This segment comprises about 24% of the total Project alignment length and is the most densely populated. In addition, about 28.6% of affected informal users are present in this segment of the Project alignment (5 Stationary informal vendors and 1 Informal mobile vendor ). One kiosk and a cafeteria are situated within Sidi Beshr Station.</p> <p>This segment of the Project alignment includes a large percentage of the shops outside the corridor but adjacent to the Project alignment route. All entrances to the shops overlook the street parallel to the Project alignment corridor, and not the Project alignment corridor itself.</p>	 <p><b>Figure 5-8: The segment between Sidi Bishr Station and Mohamed Naguib Station.</b></p>  <p><b>Figure 5-9: View of El Asafra community area parallel to the Project alignment corridor</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
<p><b>Sharq</b></p> <p><b>Approximate Chainage: 4.58km</b></p> <p><b>Distance from the Project Alignment: The distances in this segment of the Project alignment vary from a minimum of 5m up to 15m in some areas between the alignment and the surrounding facilities.</b></p>	<p><b>(Victoria - Kafr Abdou):</b> The Sharq District is an active region in the city, providing residents with educational facilities, culture and governmental support. Section 3, which starts at Victoria Station, is most notably known for Victoria College, a private British school founded in 1902. The school is still active today, providing students from affluent backgrounds with a liberal arts education. The district remains crucial to students across the city, particularly for university students. This is largely due to the presence of the main faculties belonging to Alexandria University, such as the Faculty of Fine Arts and the Faculty of Agriculture. Between Ghebrial Station and El Souqh Station, the Princess Aziza Fahmy Palace and Royal Jewellery Museum, two popular tourist destinations, can be located to the east of the Project alignment. Additionally, both a Police Department and Police Station are present to the west of the Section B route.</p> <p>The Sharq District is a concentrated hub for medical facilities and resources, with the Section B Metro alignment providing a gateway to approximately twenty hospitals. Victoria Station is surrounded by numerous medical institutes, with the Victoria Hospital to the west of the Project Alignment and El Ekbal Hospital, City Hospital and Loran Hospital to the north-east. There is a large cluster of 15 both private and public medical institutions located within close proximity to one another between Victoria Station and Ghebrial Station and to the east of El Souqh Station and Al Zahiria Station. This includes the Alexandria Specialized Hospital, German Hospital, Al Ahly Hospital and El Shorouk Hospital. Additionally, a medical centre is situated to the west of Al-Zahiria Station. These health and educational services are distributed over the total area of the District and not concentrated in the area adjacent to the Project alignment.</p> <p>District Population:</p> <ul style="list-style-type: none"> <li>• Total Population: 1,158,822;</li> <li>• Male: 593,361;</li> <li>• Female: 565,416; and</li> <li>• Number of Households: 310,615.</li> </ul> <p>The part of the metro alignment located within Sharq District area includes private land acquisition activities. In addition to the ENR property, this part includes the depot land and Kafr Abdo station. Although this segment represents about 24% of the alignment length, it is the highest in terms of population density, as well as the highest in terms of PAPs, this segment includes about 57.1% of the informal users within the alignment (7 Stationary informal vendors</p>	 <p><b>Figure 5-10: View of Victoria Station.</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>and 5 Informal mobile vendors). It also includes 1 shop in Victoria Station, a kiosk in El Souqh Station and a cafeteria in Al Zahiria Station.</p> <p>This part includes the largest percentage of the shops adjacent to the alignment path, especially in Victoria area. All entrances to the shops overlook the street parallel to the railway corridor and not the railway corridor.</p> <p>This part also includes the apartment buildings closest to the alignment in the Al- Al Zahiria, Ghebrial and Bakoos (El Souqh station area). According to the field observations during the walking rounds and the results of the FGDs with women; Where the women mentioned the existence of activities for selling drugs and abuse inside the train corridor, and they see that one of the positives impacts of the project is that it will open the train corridor after the establishment of the Viaduct, and this area will not be a target for this type of activities that are unacceptable to the community especially women.</p>	 <p><b>Figure 5-11: One of the mobile vendors at El Souqh Station (fish seller).</b></p>  <p><b>Figure 5-12: Apartment buildings outside but adjacent to the Project alignment corridor in the Ghebrial community area.</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p data-bbox="1473 735 2101 794"><b>Figure 5-13: Proposed depot land and new Kafr Abdo Station location.</b></p>
<p data-bbox="62 836 353 1219"><b>Wasat</b> <b>Approximate Chainage: 5.80km</b> <b>Distance from the Project Alignment: The distances in this segment vary from a minimum of 8m up to 35m between the alignment and the surrounding facilities in some areas.</b></p>	<p data-bbox="387 836 1447 1091"><b>(Sidi Gaber - Alexandria/ Misr):</b> The Wasat District is an educational hub for many students in Alexandria. The area provides pre-higher education for students at language schools, international schools and public schools. Moreover, university students in this district benefit as the Faculty of Commerce and Faculty of Law belonging to Alexandria University are located in this area. The majority of educational facilities are located near to El Hadra Station, particularly to the east of the Project alignment. Additionally, the new Bab Sharq Station, which will follow El Hadra Station, will be located in close proximity to the largest educational cluster in the district, providing students attending over 20 different schools with access to public transport.</p> <p data-bbox="387 1114 1447 1305">In addition to providing community members with diverse educational facilities, the Wasat District is also a cultural hub with the presence of institutions such as the Alexandria National Museum, the Greco Roman Museum, Museum of Fine Arts and the Bibliotheca Alexandrina to east of the proposed new Bab El Sharq Station. Additionally, the city’s most prominent medical institutions (such as the Gamal Abdelnasser Hospital) are located in the Wasat District. Numerous government service offices such as the Electronic Portal Office Governorate of Alexandria,</p>	 <p data-bbox="1473 1283 2101 1310"><b>Figure 5-14: Kiosk in Sidi Gaber Station (PAP).</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
	<p>Smouha Health Bureau and Local Government Office are located to the west of Sidi Gaver Station and El Hadra Station.</p> <p>District Population:</p> <ul style="list-style-type: none"> <li>• Total Population: 543,405;</li> <li>• Male: 273,479;</li> <li>• Female: 269,926; and</li> <li>• Number of Households: 148,238.</li> </ul> <p>The Project alignment segment located within Wasat District includes private land acquisition activities. In addition to the ENR property, this part includes the expropriation of land parcels to be used for the development of Bab Sharq and Sporting stations.</p> <p>Although this segment represents about 26.4% of the total alignment length (the longest segment), it is the least densely populated. This segment includes only 2 kiosks in Sidi Gaber Station but does not include informal users within this segment of the Project alignment.</p> <p>This segment does not include shops outside and adjacent to the alignment corridor. Although, a few apartment buildings are situated outside but close to the Project alignment corridor in within the vicinity of El Hadra Station. the apartment buildings are closer to the alignment of another railway line.</p>	 <p><b>Figure 5-15: Land parcel to be used for the development of the proposed Bab Sharq Station.</b></p>  <p><b>Figure 5-16: Land parcel to be used for the development of the proposed Sporting Station</b></p>

Community	Summary of Socio-Economic Characteristics	Photographs of the Relevant Project Affected Areas (Land, Shops, and Houses)
		 <p data-bbox="1473 679 2112 740"><b>Figure 5-17: View of the end of the Project alignment at Alexandria/ Misr Station.</b></p>

### 5.3 Characteristics of Affected People and Businesses

#### 5.3.1 PAP distribution along the Project Alignment

The following PAP categories have been identified based on the socio-economic survey and the two rounds of walk-throughs along the Project alignment carried out by the RAP team. These categories also align with the information presented in the RF prepared for the Abou Qir Metro Project, the land acquisition ministerial decree that was issued for the Project and the ENR inventory:

**Table 5-3 PAP Categories for the Project**

PAPs Categories			Number of PAPS
<b>Primary PAPS<sup>22</sup></b>			
<b>Owners of private land parcels</b>	The Depot land	Al Nahas Company <sup>23</sup>	1 Company
		Heirs of the Gawish family	About 184 persons <sup>24</sup>
		Heirs of the Behairi family	About 12 persons
	Bab Sharq Station land parcel		Heirs of Mohamed Abdullah Abdul Halim (6 persons)
	Sporting Station land parcel		Heirs of Mohamed Ramadan Awad Allah (4 persons)
<b>Formal tenants of shops located inside stations</b>			8
<b>Informal users within the Project alignment</b>	Stationary informal vendors		15
	Informal mobile vendors		6
<b>Potentially Affected PAPS<sup>25</sup></b>			
<b>The Shops adjacent to the Project corridor</b>			A representative sample of 65 Shop (a 20% sample from the total number of shops)
<b>The Households near to the Project corridor</b>			A representative sample of 40 Household (5 apartment buildings from each area located in/ between

<sup>22</sup> The primary PAPS are those who will definitely be affected by the Project either due to their land parcels needing to be acquired for the Project or where a PAP's economic activities and livelihood will be affected due to the implementation of the Project.

<sup>23</sup> Al Nahas Company is affiliated with the Ministry of Business Sector.

<sup>24</sup> The numbers in this table for the affected landowners are according to the results of the socio-economic survey conducted by the RAP team. These are representatives of the landowners for the land parcels subject to survey, not according to the owners' lists issued by the ASD, which have not as yet been issued.

<sup>25</sup> These PAPS were not identified during the preparation of the RAP, but may be affected in the future by construction activities. A sample of this category was selected from certain areas according to their proximity to the Project alignment as described in **Chapter 4: RAP Methodology** and Section 5-2 of this Chapter.

PAPs Categories	Number of PAPS
	stations Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra, according to how close they are to the alignment corridor)

### 5.3.2 Owners of private land parcels

Private land parcels are land that is included in the land acquisition ministerial decree. The decree includes three land parcels privately owned, none of which are held in individual ownership (i.e. all land parcels are owned by multiple parties who are heirs to the subject land). The RAP team held two meetings with a number of landowner delegates representing all the shareholders of the land parcels to be acquired, in addition to, visiting the land parcels to assess their characteristics and condition at the time.

#### Land use

**Table 5-4** summarises the use and area of the private land parcels that are currently planned for expropriation.

**Table 5-4 Private land use and area**

Land	Use	Area <sup>26</sup>
Depot land	The landowners of the proposed depot land confirmed that the land is non-agricultural (no crop production) and currently not used for any purpose. Part of the depot land is occupied by a Copper Company comprising a factory building and an administrative building which in total is 185,525 m <sup>2</sup> . The factory is not currently in operation. In addition, there are some palm trees on the land (the number is unknown).	The area belonging to the heirs of Gawish and Buhairi families: 18,911 m <sup>2</sup> .
Bab Sharq Station land parcel	The land parcel to be used for the development of the new Bab Sharq Station is currently used as an open-air parking area. In addition, the southwest corner of the land parcel entrance is used as a car wash. According to the landowner representative, the land is rented to a formal tenant to provide car wash services; the monthly cash return from the land is 45,000 EGP as verbally communicated during the survey. There are no plants or trees planted on the land, but there is a security guard room with water, sewage and electricity facilities.  The landowner representatives confirmed that the total land area is greater than the area required to be expropriated for the Project, and that the remaining land area after expropriation will be unviable and not suitable for use for other purposes.	860 m <sup>2</sup>

<sup>26</sup> The areas of land attached in the table are as reported by the land owners not from the reports of the ASD

Land	Use	Area <sup>26</sup>
Sporting Station land parcel	The land parcel to be used for the development of the new Sporting Station is currently used as an open-air area to park cars belonging to the landowners. In addition, part of the land used to store some building materials owned by the landowners. According to the landowner's representative, the land parcel is not currently rented and is not used for any activity other than what has been mentioned. There are no plants or trees present, but there is a security guard room with water, sewage and electricity facilities.	850 m <sup>2</sup>

### Legal status of land parcels

All landowners confirmed that their landownership is legal and they hold the legal documents and ownership contracts to confirm this to be the case<sup>27</sup>. They also mentioned that their land parcels are of value due to their location resulting in increased land value over the past five years.

### 5.3.3 Tenants of shops located in stations

The RAP team conducted a socio-economic survey of all the shops located in the existing stations, which were identified during the 2 rounds of Project walk-throughs of all the existing stations, the ENR inventory and the final inventory of the Compensation Committee.

The results of the socio-economic survey conducted by the RAP team for formal shop tenants is shown in **Table 5-5** below.

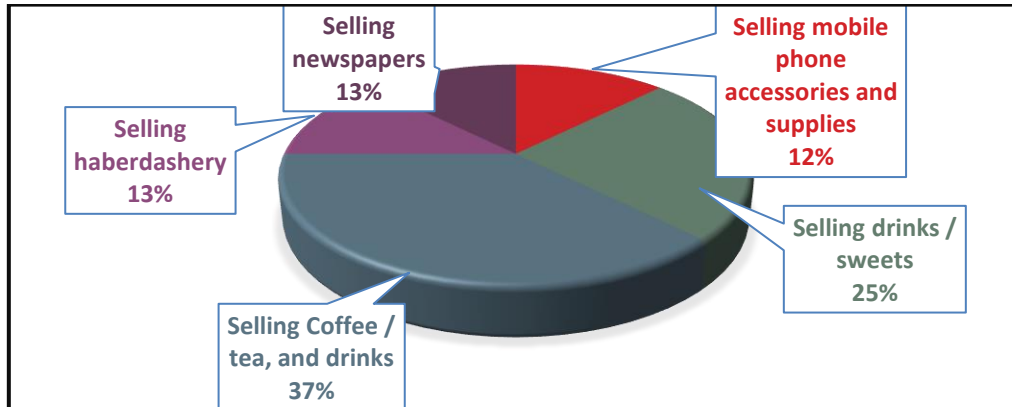
**Table 5-5 Socio-economic characteristics of tenants of shops located in stations**

Total Number	Business Type	Location	Legal <sup>28</sup> Status
8	Selling mobile accessories and supplies (1 Shop)	Victoria Station	Tenant with formal lease agreement
	Selling haberdashery/ drinks / sweets (2 Kiosks)	Sidi Gaber Station	Tenants with formal lease agreement
	Selling Coffee / tea, and drinks (3 Cafeterias)	Abou Qir Station	Tenant with formal lease agreement.
		Al Zahiria Station	Tenant without any contractual agreements
		Sidi Beshr Station	Tenant without any contractual agreements
	Selling haberdashery (1 Kiosk)	Sidi Beshr Station	Tenant with formal lease agreement

<sup>27</sup> The consultant did not receive the ASD's report, which includes the names of the landowners, except for the depot land's report, which includes the names of Gawish family and Behairy family. The landowners of Bab Sharq and Sporting were identified through the site visit, and information was obtained from the security gatehouse on the name of the land owner and how to communicate with him.

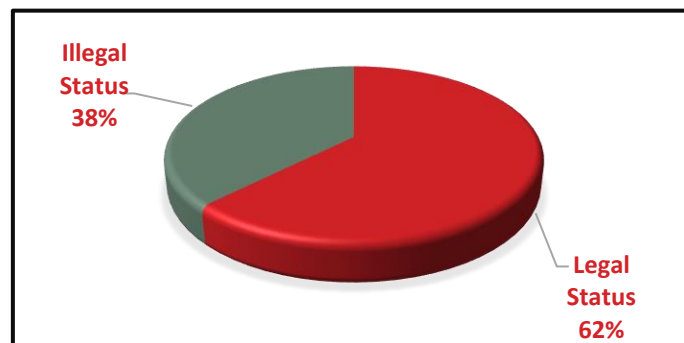
<sup>28</sup> Legal status is defined as tenants with valid lease agreement or not valid/ expired lease agreement and are still paying the rent, whereas illegal status refers to tenants without any contractual agreements.

Total Number	Business Type	Location	Legal <sup>28</sup> Status
	Selling newspapers (1 Kiosk)	El Souqh Station	Tenant with expired lease agreement



**Figure 5-18 Distribution of shops within the existing stations according to the business type**

The data of the previous table shows the legal status of shop tenants, i.e. those who have valid lease contracts/ agreements for shops (4 PAPs) or not valid/ expired lease agreement and is still paying the rent (1 PAP) and those who do not have contractual agreements (2 PAP) and do not pay rent, this means that they are informal.



**Figure 5-19 Legal status of shops within the existing stations**

All the shops in the existing stations are rented from ENR or from entities that are affiliated with ENR. However, according to the results of the socio-economic survey, not all tenants have valid contracts. The following figure shows the percentage of valid contracts from the tenants of the shops located in the existing stations. It is clear from the data of the following figure that (50%) of the businesses owners have a formal lease agreement whilst (12%) of business owners hold an expired lease agreement with ENR and (38%) of business owners do not have contract/ agreement.

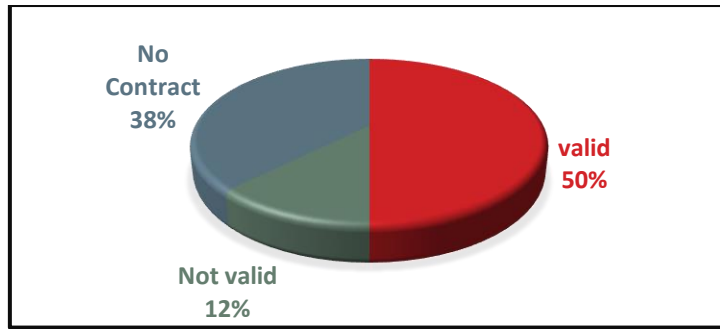


Figure 5-20 The percentage of valid contracts from shop tenants in existing stations

5.3.4 Informal users within the Project alignment

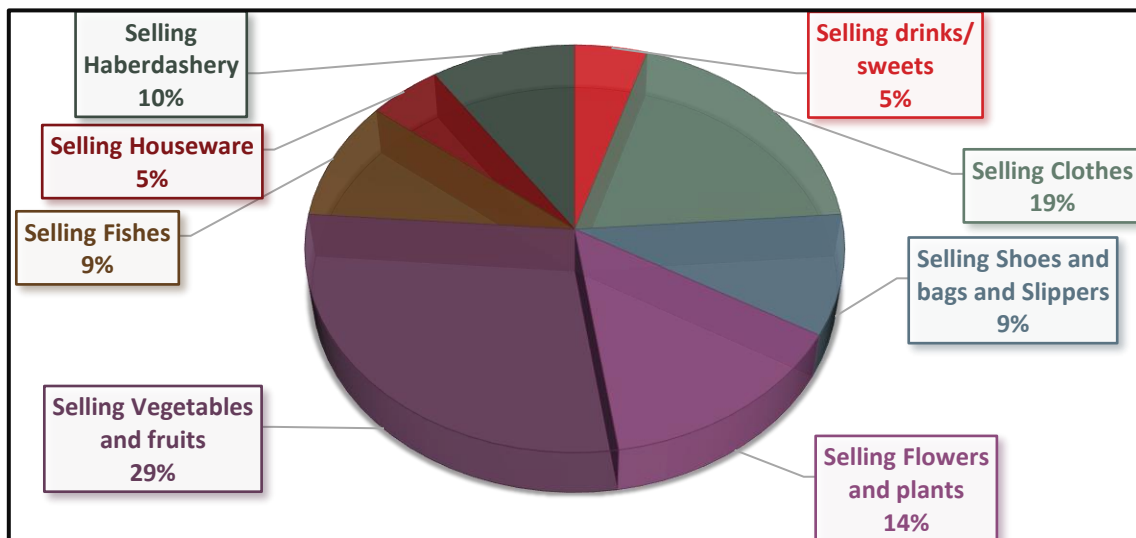
The RAP team conducted a socio-economic survey of the stationary informal vendors and informal mobile vendors located in the Project alignment corridor, which were identified through the 2 rounds of walk-throughs of all the stations, the ENR inventory and the final inventory of the Compensation Committee.

The results of the socio-economic survey conducted by the RAP team for informal users within the Project alignment are shown in **Table 5-6** below.

Table 5-6 Characteristics of Informal users within the Project alignment

PAPs	Total Number	Business Type	Location	Legal Status
Stationary Informal Vendors	15	Selling Vegetables and fruits (5)	El Souqh, Victoria and El Asafra Stations	(12) Stationary Informal vendors with no rental agreement
		Selling Clothes (4)	Victoria and El Asafra Stations	
		Selling Shoes and bags and Slippers (2)	Victoria and El Asafra Stations	
		Selling drinks/ sweets (1)	Between Maamoura and Tosan stations	
		Selling Flowers and plants (3)	After Ghebrial Station and between Maamoura and Tosan stations	(1) Stationary, tenant with formal lease agreement. (2) Stationary Informal vendors with no rental agreement
Informal Mobile Vendors	6	Selling Vegetables and fruits (1)	El Souqh Station	(6) Informal mobile vendors with no rental agreement
		Selling Fishes (2)	El Souqh and	

PAPs	Total Number	Business Type	Location	Legal Status
			Victoria Stations	
		Selling Houseware (1)	Victoria Station	
		Selling Haberdashery (2)	El Souqh Station and between Maamoura and Tosan stations	



**Figure 5-21 Distribution of Informal users within the Project alignment by business type**

**Figure 5-21** shows that the diversity of informal economic activities within the Project alignment. The largest proportion of informal vendors sell vegetables and fruits (29 %) followed by sellers of clothes (19%). Informal vendors selling houseware and drinks represents the lowest percentage (at 5% each).

The area occupied by the informal economic activities varies within the Project alignment. The total area occupied by (14) informal users ranges from 3 to 6 m<sup>2</sup> for each. The highest area occupied by informal users related to flower and plant nurseries with an area of 15-30 m<sup>2</sup> for each, with and the lowest area occupied not exceeding 2 m<sup>2</sup>.

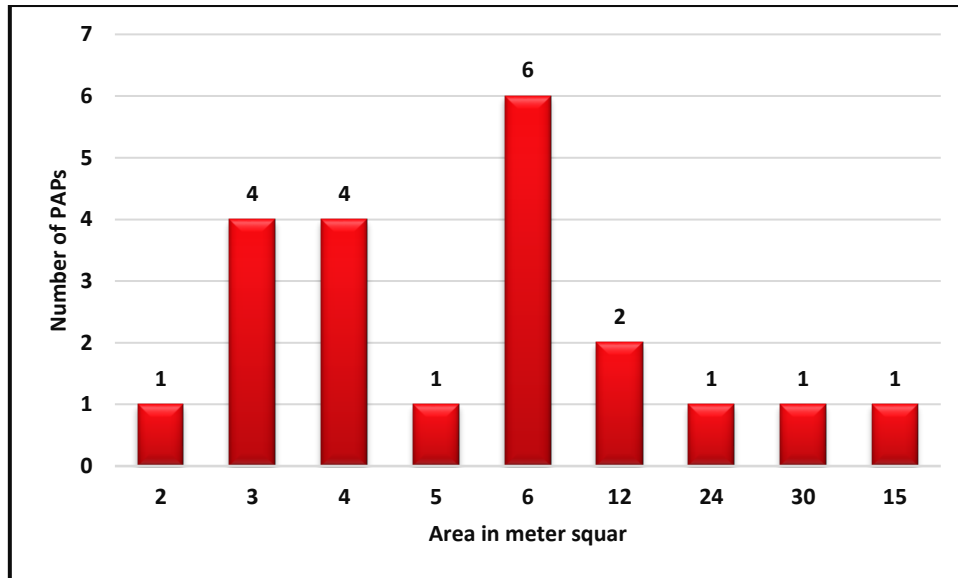


Figure 5-22 Area occupied by the informal users

The results of the socio-economic survey show that all the informal users own the tools (such as tables, mobile tables, kiosks) that they use for their economic activity. All of the informal users own their tools individually (single ownership) except for two only are joint ownership.

5.3.5 Shops outside but adjacent to the Project alignment corridor

As mentioned before, the socio-economic survey for shops outside the Project alignment corridor included a representative sample of the shops outside and adjacent to the Project alignment. The sample was selected according to the most recent satellite data available (up to December 2021), in addition to, pedestrian routes in the areas where the presence of shops is concentrated.

The results of the socio-economic survey conducted by the RAP team for shops adjacent to the Project corridor are presented in Table 5-7 below.

Table 5-7 Characteristics of Shops adjacent to the Project corridor

Business Type	Location						Total
	Victoria Station – Mohamed Naguib Station	Mohamed Naguib – Sidi Bishr Station	Sidi Bishr Station – Miami Station	Miami Station – Asafra Station	Asafra Station – El Mandara Station	El Mandara Station - El Montazah	
Mobile phone accessories and supplies	1	1	1	-	1	1	5
Haberdashery/ drinks/ sweets (kiosk)	-	1	1	2	-	-	4
Coffee/ tea and drinks	-	-	-	-	-	1	1

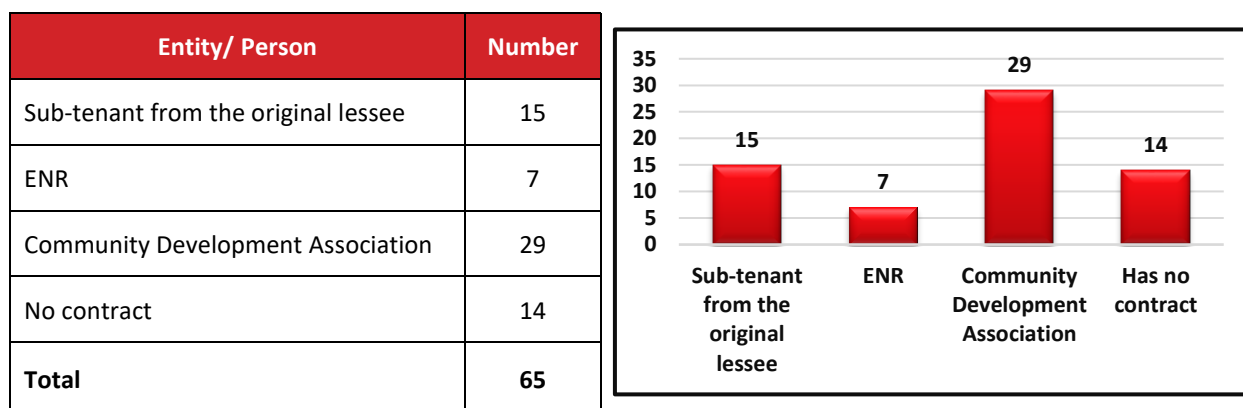
Business Type	Location						Total
	Victoria Station – Mohamed Naguib Station	Mohamed Naguib – Sidi Bishr Station	Sidi Bishr Station – Miami Station	Miami Station – Asafra Station	Asafra Station – El Mandara Station	El Mandara Station - El Montazah	
Clothes	8	8	-	2	-	2	20
Shoes and bags	1	-	-	-	1	1	3
Juice shop	-	-	-	1	-	-	1
Flowers and plants	1	-	-	-	1	-	2
Pet birds	1	1	-	-	-	-	2
TV transmitter dishes	-	1	-	-	1	-	2
Electronics sales and maintenance	2	1	-	1	1	-	5
Watches sale and repair	1	1	-	-	1	-	3
Oriental sweets	-	-	-	-	1	-	1
Paints	1	-	-	-	-	-	1
Gold and silver crafts	1	-	-	-	1	-	2
Frozen meat / butcher	1	-	-	-	-	1	2
Cosmetics	-	1	1	-	-	1	2
Furniture	-	1	-	-	-	-	1
Bean grinder	-	1	-	-	-	-	1
Shoe repair	-	1	-	-	-	-	1
Sharpening knives	1	-	-	-	-	-	1
Barber	-	-	-	-	-	1	1
Electrician	-	1	-	-	-	-	1
Carpenter	-	1	-	-	-	-	1

Business Type	Location						Total
	Victoria Station – Mohamed Naguib Station	Mohamed Naguib – Sidi Bishr Station	Sidi Bishr Station – Miami Station	Miami Station – Asafra Station	Asafra Station – El Mandara Station	El Mandara Station - El Montazah	
Quran and prayer clothes	-	-	1	-	-	-	1
<b>Total</b>	<b>19</b>	<b>20</b>	<b>4</b>	<b>6</b>	<b>8</b>	<b>8</b>	<b>65</b>

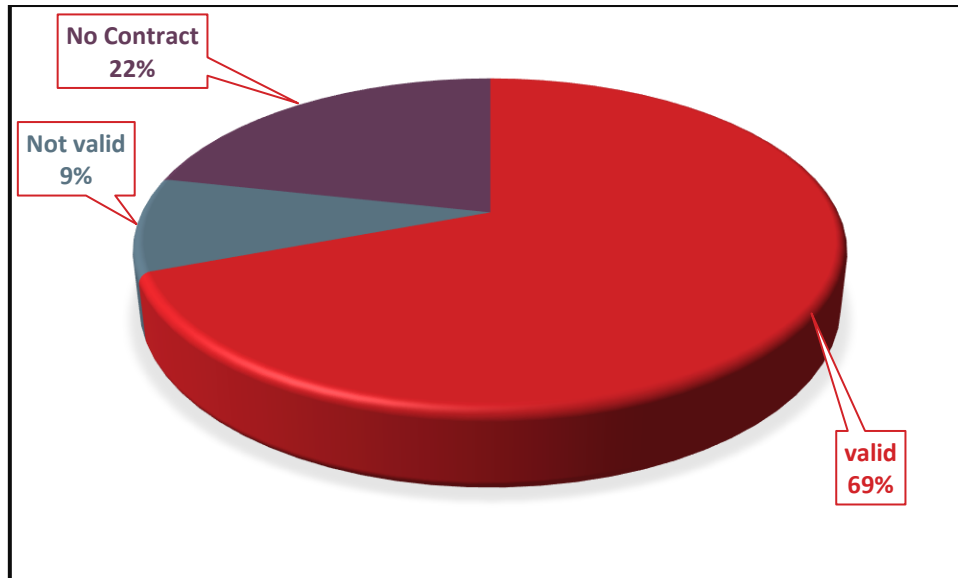
The shops adjacent to the Project alignment corridor are situated within the vicinity of Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, Mandara and Montazah stations. These are the areas where the Project alignment will be elevated, and as such these shops may be impacted by Project construction activities. Shops selling clothes, mobile phones and electrical appliances are among the most popular commercial activities identified, in addition to, many food shops. The areas in which the shops are located are mostly commercial areas, in addition to, to densely populated areas (Montazah Awal and Sharq Districts).

The results of the socio-economic survey showed that the largest percentage of the shops adjacent to the Project alignment are rented from an entity called "Community Development Association", with contracts renewed annually for the current tenants. **Table 5-8** shows the entity/ person with whom the tenant has a contract.

**Table 5-8 The entity/ person who the shop tenants is contracted with**



According to the results of the socio-economic survey, the vast majority of tenants have legal status; As (45 PAPs represent 69% of the study sample) of them have valid lease contracts/ agreements for shops or not valid/ expired lease agreement and are still paying the rent (6 PAPs represent 9% of the study sample) and those who do not have contractual agreements (14 PAP represent 22% of the study sample) they are sub-tenants and pay rent but do not have any contractual agreement, this means that they are informal tenants. **Figure 5-23** shows the percentage of valid contract holders.



**Figure 5-23 the percentage of s the status of contracts / agreements for tenants of the shops adjacent to the alignment corridor**

### 5.3.6 Households outside but near the Project alignment corridor

As mentioned before, the socio-economic survey included a sample of the apartment buildings outside but adjacent to the Project alignment corridor. According to the site visits conducted by SYSTRA during the preparation of the environmental and social studies for the Project, some areas in the viaduct section were identified as apartment buildings close to the Project alignment, near to the following stations: Al Zahiria, El Souqh, Ghebrial, Victoria, Mohamed Naguib (New), Sidi Bishr, Miami (New) and Asafra.

The RAP team selected a sample of areas between the previous stations with a focus on the areas closest to the alignment corridor, which are: Al Zahiria, El Souqh, Ghebrial and Victoria. The sample size was selected according to the results of the walk-throughs conducted by the RAP team, which showed that some areas located in the bio-alignment track are located very close to the current railway track, separated from the rail corridor by a fence. These apartment buildings are located in the area from Al Zahiria Station to Victoria Station

Some of the apartment buildings in these areas were observed to be in a dilapidated condition, especially in Al Zahiria. As a result, the RAP team intensified the socio-economic survey sample of households in this area. Where apartment buildings were observed during the Project walk-through to be the closest to the Project alignment corridor, and as such could be impacted by Project constriction activities

The number of floors in these apartment buildings varies. Some buildings can reach up to 10 floors, whilst others do not exceed 3 floors. However, average the majority of apartment buildings in these areas consist of 5 floors.

According to the previous description, the sample size was determined according to several factors, namely:

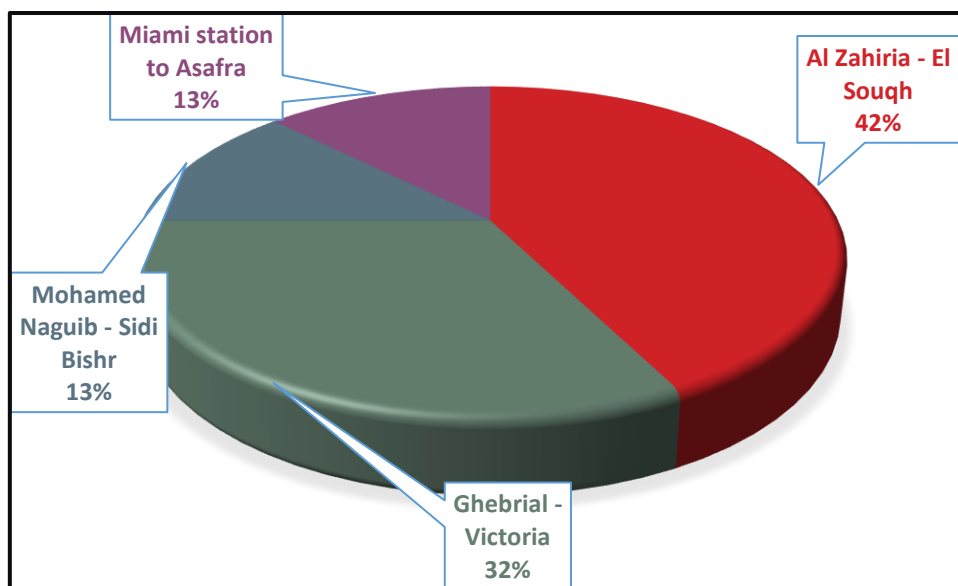
- The apartment building closest to the alignment corridor;
- Population density of the area near to the alignment;

- The structural condition<sup>29</sup> of the apartment buildings closest to the alignment corridor (the old dilapidated buildings) because they are vulnerable to the construction impacts; and
- Acceptance of residents to participate in the socio-economic survey.

Therefore, the sample size from the apartment buildings came as follows, with a total sample of 40 households one apartment in each apartment buildings:

- From Al Zahiria Station to El Souqh Station (17 apartment buildings);
- From Ghebrial Station to Victoria Station (13 apartment buildings);
- From Mohamed Naguib Station to Sidi Bishr Station (5 apartment buildings); and
- From Miami Station to Asafra Station (5 apartment buildings).

**Figure 5-24** shows the distribution of the household sample over the areas outside but near to the Project alignment corridor.



**Figure 5-24** distribution of the household sample along the Project alignment

The results of the socio-economic survey showed that the majority of the respondents in the survey sample are property owners (70%), with the remaining respondents being tenants (30%).

<sup>29</sup> These apartment buildings were selected within the study sample according to field observations as well as the discussions with residents during conducting of the socio-economic survey, this selection was not made according to any reports or documents from SYSTRA or the Governorate.

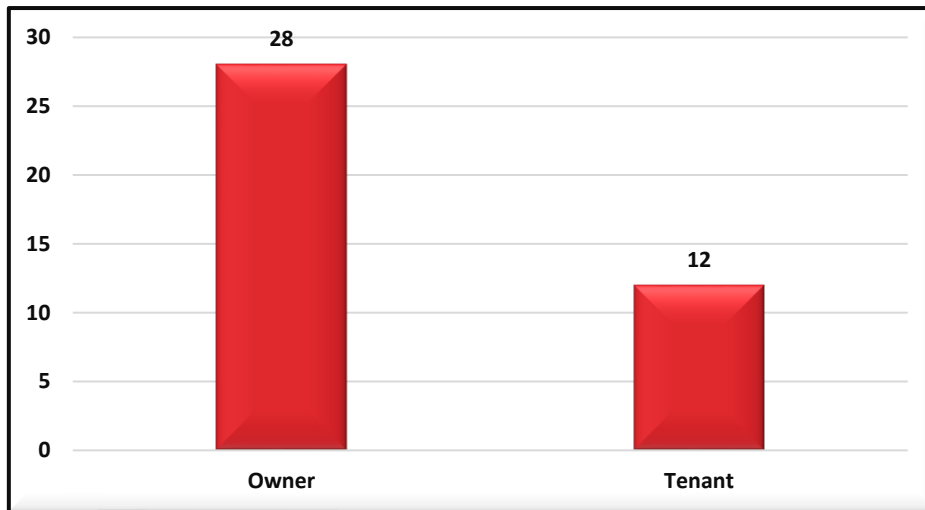


Figure 5-25 Distribution of the survey sample according to property ownership

## 5.4 Demographic Profile

### 5.4.1 Population

Table 5-9 describes the distribution of the PAP population according to the results of the socio-economic survey.

With regard to private landowners, the RAP team has not yet had an official statement from ESA on the number of PAPs. The socio-economic survey was conducted with some of the landowners and their representatives.

Table 5-9 Distribution of PAPs according to the population

PAPs Groups	Number of PAPs	Number of Family Members		
		Male	Female	Total
Tenants of shops located in stations	8 Tenants	20	18	38
Informal users within the Project alignment	21 Informal users	49	59	108
Shops outside and adjacent to the Project alignment corridor	65 Shop	164	136	300
Households outside and near to the Project alignment corridor	40 Household	81	61	142
<b>Total</b>	<b>134</b>	<b>314</b>	<b>274</b>	<b>588</b>

The results of the socio-economic survey showed that the total number of affected persons (588 PAPs<sup>30</sup>) including the number of family members for all PAPs. Should be considered that the largest

<sup>30</sup> This number includes the total number of family members for all PAPs gropes included in the study sample, including households outside and near to the Project alignment corridor and shops outside and adjacent to the Project alignment

number of PAPs is represented in the grope of potential affected PAPs by construction (shops and households adjacent/ close to the alignment corridor (442 PAPs) about (75%) of the total sample. The primary PAPs (146 PAPs) (including the total number of family members) about (25%) of the total PAPs. The demographic data of the study sample indicates that males represent (53%) compared to (47%) females.

**5.4.2 Distribution according to age groups**

The results of the socio-economic survey showed that the highest age group among PAPs was the group from (31-45-40%), as it represented the largest percentage among each group of PAPs, and the lowest age group was 60 and above, the number of PAPs in this group was (16-12%) out of the total of all PAPs groups. The following table shows the distribution of PAPs by age group.

Table 5-10 describes the distribution of PAPs according to age groups; the data of the following table does not include land owners due to their unavailability at the present time as mentioned before.

**Table 5-10 Distribution of PAPs according to age groups**

PAPs	20-30	31-45	46-60	61 and Above
Tenants of shops located in stations	1	4	2	1
Informal users within the alignment	2	7	9	3
Shops outside and adjacent to the Project alignment corridor	8	26	23	8
Households outside and near to the Project alignment corridor	5	17	14	4
<b>Total</b>	<b>16</b>	<b>54</b>	<b>48</b>	<b>16</b>

**5.4.3 Distribution according to gender**

The results of the socio-economic survey mentioned that the number of females out of the total number of PAPs represents the lower percentage (25 female) (19%), as the majority of PAPs are males. The results of the survey indicated that the women who rent shops, whether inside the stations or adjacent to the train corridor, are the breadwinners for their families, two of whom inherited the shop from the father or husband. This does not apply to the sample from the household surveys as the percentage of female’s respondents is due to their presence at home during the survey.

Table 5-11 describes the gender distribution according to each group of PAPs, which shows that the percentage of males over females is (81% male), compared to (19% female), as mentioned above. It is worth noting that there are no restrictions/ limitations in ENR for female rental, as well as in the shops adjacent to the corridor.

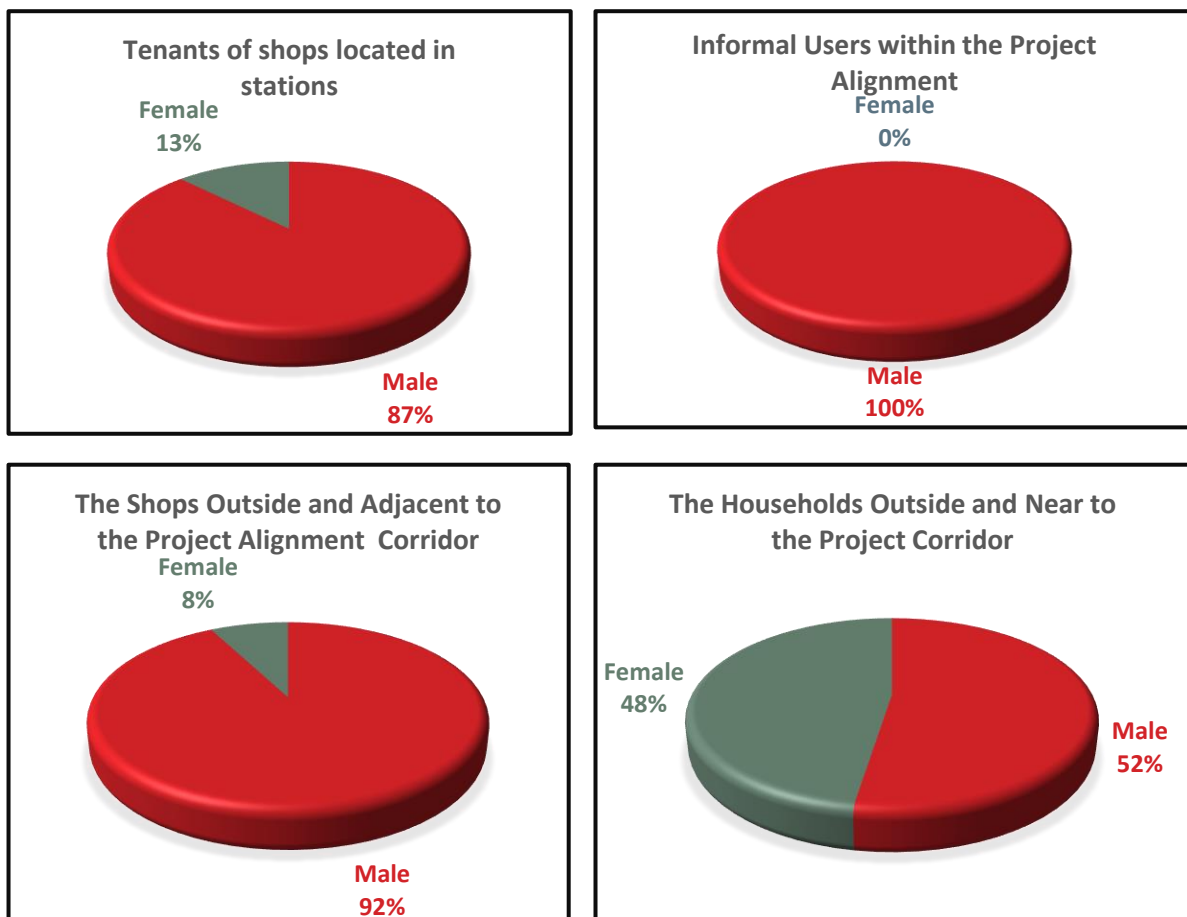
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corridor sample of the living unit as well as the sample of shops adjacent to the alignment corridor, given that the socio-economic survey has been applied to them.

**Table 5-11 Distribution of PAPs according to gender**

PAPs	Male	Female
Tenants of shops located in stations	7	1
Informal users within the alignment	21	-
Shops outside and adjacent to the Project alignment corridor	60	5
Households outside and near to the Project alignment corridor	21	19
<b>Total</b>	<b>109</b>	<b>25</b>

**Figure 5-26** shows the distribution of PAPs groups according to gender in each group. Informal users within the Project alignment group all are male with the percentage of female’s users being (0%). Tenants of shops located in stations consist of (87%) males and (13%) females’ tenants. Shops outside and adjacent to the Project alignment corridor group (92%) males (8%) females. Family members by gender within the households outside and near to the Project alignment corridor group comprises 52%) males and (48%) female.



**Figure 5-26 Distribution of PAPs according to gender**

#### 5.4.4 Distribution of PAPs according to education

The results of the socio-economic survey showed the diversity of educational status among PAPs. The percentage of read and write only represents the lowest percentage by (7) (5%) of all PAPs. Secondary/ technical secondary education represents the highest percentage in the educational status (25.4%), followed by university education (19.4%) the tenants of shops adjacent and near to the Project alignment corridor represent (65%) of them., Then primary education (18.6%), then uneducated, intermediate and preparatory education at percentage of (10.4%) for each of them. The sample of household representing (50%) of the uneducated PAPs. Previous data on educational status reflect the characteristics of the population in these areas, especially the areas of Al Zahiria, El Souqh and Ghebrial.

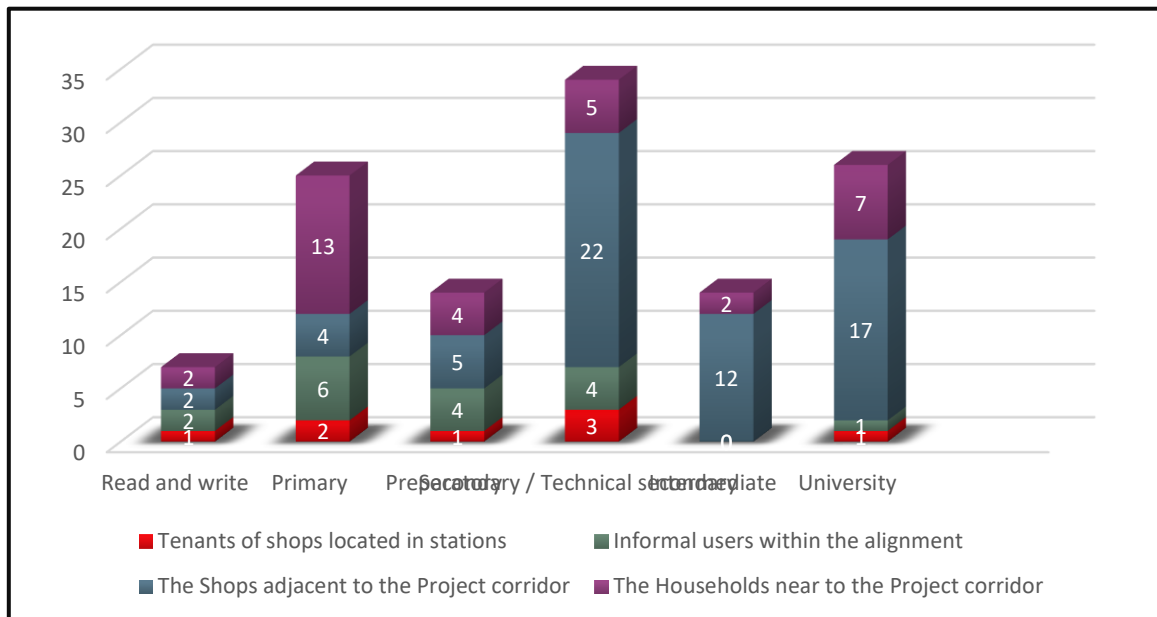
Table 5-12 describes the distribution of PAPs by educational status.

**Table 5-12 Distribution of PAPs according to the educational status of each PAPs group**

PAPs	Uneducated	Read and write	Primary	Preparatory	Secondary / Technical secondary	Intermediate	University
Tenants of shops located in stations	-	1	2	1	3	-	1
Informal users within the Project alignment	4	2	6	4	4	-	1
Shops adjacent and Near to the Project alignment corridor	3	2	4	5	22	12	17
Households Outside and near to the Project alignment corridor	7	2	13	4	5	2	7
<b>Total</b>	<b>14</b>	<b>7</b>	<b>25</b>	<b>14</b>	<b>34</b>	<b>14</b>	<b>26</b>

It is noted from the data of **Table 5-12** that the percentage of university education in the two affected groups tenants of shops located in stations and informal users within the project alignment is very low (only 1 PAP in each group) compared to (65% university education) among the sample of shops adjacent and Near to the Project alignment corridor group. The analysis of the data in the previous table of the educational situation among the affected people indicates a low level of education for the primary PAPs, especially the informal users of the train corridor, which links the low level of education and the informal use and economic activities of the railway corridor land. This, in turn, reflects the socio-economic status of those affected.

**Figure 5-27** describes the distribution of the educational status in each PAPs group, comparing the distribution of the educational status among the groups to each other.



**Figure 5-27 Distribution of PAPs according to education**

**5.4.5 Distribution of PAPs according to social status**

**Table 5-13** describes the results of the socio-economic survey which state that the vast majority of PAPs are married, amounting to (102) (76%) of the total PAPs, which makes them responsible for providing for their families and increases their social and economic obligations. This is compared to (18) (13.4%) of the total affected being unmarried (single).

**Table 5-13 Distribution of PAPs according to social status**

PAPs	Single	Married	Separated	Divorced	Widower
Tenants of shops located in stations	-	8	-	-	-
Informal users within the Project alignment	1	18	-	1	1
Shops outside and adjacent to the Project alignment corridor	11	53	-	1	-
Households outside and near to the Project alignment corridor	6	23	2	1	8
<b>Total</b>	<b>18</b>	<b>102</b>	<b>2</b>	<b>3</b>	<b>9</b>

## 5.5 Employment and Income

### 5.5.1 Income

- **Type of wage or salary/ income**

**Table 5-14** describes the results of the socio-economic survey in terms of income/ wage showed that the vast majority of PAPs have unstable income, as (88) (93.6%) of PAPs confirmed that the income they receive is unstable and varies from day to day and from season to season, this is consistent with the nature of economic activities with variable income related to the volume of commercial activity and selling rates. Only (6) (6.4%) of the PAPs stated that their income is stable and the difference from month to another is not large and does not make the income unstable. **Table 5-14** shows the response of PAPs to type of wage or salary/ income.

**Table 5-14 Type of wage or salary/ income**

PAPs	Stable Salary/ Income	Unstable Salary/ Income
Tenants of shops located in stations	-	8
Informal users within the Project alignment	1	20
Shops outside and adjacent to the Project alignment corridor	5	60
<b>Total</b>	<b>6</b>	<b>88</b>

- **Income Amount**

**Table 5-15** shows the distribution of PAPs by monthly income categories. According to the socio-economic survey data, most of the PAPs are below the minimum wage level, the income category (1501-2000) is the most common category of income among the PAPs, as it represents (25.5%) from the total sample), followed by the income category (2001-2500) represents (18%), followed by the income category (3001-4000) represents (14.8%) which is equal to the income category (1001-1500) of the total sample.

**Table 5-15 Distribution of PAPs according to net Income Amount**

PAPs	500: 1000 EGP	1001: 1500 EGP	1501: 2000 EGP	2001: 2500 EGP	3001: 4000 EGP	4001: 5000 EGP	5001: 6000 EGP	More than 6001 EGP	Do not know	Refused to answer
Tenants of shops located in stations	-	2	1	1	2	1	1	-	-	-
Informal users within the Project alignment	4	6	6	1	1	1	1	1	-	-
Shops outside and adjacent to the Project alignment corridor	4	6	17	15	11	2	1	1	6	2

PAPs	500: 1000 EGP	1001: 1500 EGP	1501: 2000 EGP	2001: 2500 EGP	3001: 4000 EGP	4001: 5000 EGP	5001: 6000 EGP	More than 6001 EGP	Do not know	Refused to answer
<b>Total</b>	<b>8</b>	<b>14</b>	<b>24</b>	<b>17</b>	<b>14</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>6</b>	<b>2</b>

- **Other sources of income**

Table 5-16 describes the results of the socio-economic survey indicate that the vast majority of PAPs have no other source of income, as the results show that only (17) (18%) of the total PAPs have another source of income. Which gives an indication that (82%) of the total PAPs depend only on the source of income from the economic activity that it is likely to be affected by the project, making them more vulnerable to the project impacts on their livelihoods.

**Table 5-16 Distribution of PAPs according to Other sources of income**

PAPs	Other sources of income
Tenants of shops located in stations	2
Informal users within the Project alignment	1
Shops outside and adjacent to the Project alignment corridor	14
<b>Total</b>	<b>17</b>

- **Income represent income generated for several families**

According to the results of the survey described in Table 5-17, (50%) of the PAPs income represents income generated for other families (47 PAPs), where by the respondent supports the family of his deceased brother, whilst another supports his mother and sisters.

**Table 5-17 Distribution of PAPs according to Income Generated for Several Families**

PAPs	Income Represents Income for Several Families
Tenants of shops located in stations	3
Informal users within the Project alignment	9
Shops outside and adjacent to the Project alignment corridor	35
<b>Total</b>	<b>47</b>

### 5.5.2 Employees

It is clear from the results of the socio-economic survey that (50%) of the shops, whether located within the existing stations or outside and adjacent to the Project alignment corridor, have employees. These employees are employed without formal work contracts or social insurance. According to the business owners, the vast majority of employees work full-time, but they do not continue to work for a long

time. Some of the employees are seasonal from university students, and others do not continue to work for a long time, they work for a few months and move to work elsewhere in the event of an increase in income or move to work near the area of residence. **Table 5-18** shows the number of shops where there are employees (47 shop) (50%), and the employee gender distribution (males and females) Male employment predominates female workers employed with a ratio of 78.7%, to 21.3%. Female employment is also limited to the shops outside and adjacent to the Project alignment corridor. In general, the presence workers employed in the shops located inside the stations is limited with a rate of (4 employees only) (8.5%), while no workers are employed by informal users within the Project alignment, as they are limited to the business owner.

**Table 5-18 Distribution of PAPs according to employees in the shops**

PAPs	Number of shops that have employees	Number of Male Employees	Number of Female Employees
Tenants of shops located in stations	4	4	-
Informal users within the Project alignment	-	-	-
Shops outside and adjacent to the Project alignment corridor	43	33	10
<b>Total</b>	<b>47</b>	<b>37</b>	<b>10</b>

- **Wages of a regular employee**

**Table 5-19** shows the categories of employees' wages in the affected/ potentially affected shops. It is noted from the data of the following table shown that the employees' wages category (1001-1500) is the most common category of wages among the PAPs, as it represents (47.8%) from the total sample, followed by the employees' wages category (1501: 2000) represents (21.3%), followed by the employees' wages category (500: 1000) represents (15.2%) of the total sample.

**Table 5-19 Distribution of PAPs according to wages of a regular employee**

PAPs	500: 1000 EGP	1001: 1500 EGP	1501: 2000 EGP	2001: 2500 EGP	3001: 4000 EGP	4001: 5000 EGP
Tenants of shops located in stations	1	1	1	-	1	-
Informal users within the Project alignment	-	-	-	-	-	-
Shops outside and adjacent to the Project alignment corridor	6	21	9	3	3	1
<b>Total</b>	<b>7</b>	<b>22</b>	<b>10</b>	<b>3</b>	<b>3</b>	<b>1</b>

### 5.5.3 Monthly rent value

**Table 5-20** describes the results of the socio-economic survey that show the vast majority of shops pay rent to use these shops. The rent value categories vary according to the recency of the signed rental contract according to the categories listed in **Table 5-20**. It is noted from the data of the following table shown that the rent value category (less than 200 EGP) is the most common category of rent value among the PAPs, as it represents (37.5%) from the total sample, followed by the rent value category (2001: 2500 EGP) represents (23.4%), followed by the rent value category (500: 1000 EGP) represents (11%) and category (1001: 1500 EGP) represents (9.3%) of the total sample.

**Table 5-20 Distribution of PAPs according to monthly rent value**

PAPs	less than 200 EGP	200: 500 EGP	500: 1000 EGP	1001: 1500 EGP	1501: 2000 EGP	2001: 2500 EGP	5000 EGP or more	Do not know
Tenants of shops located in stations	-	-	3	2	2	1	-	-
Informal users within the alignment	-	-	-	1	-	-	-	-
The Shops adjacent to the Project corridor <sup>31</sup>	24	2	4	3	6	14	2	8
<b>Total</b>	<b>24</b>	<b>2</b>	<b>7</b>	<b>6</b>	<b>8</b>	<b>15</b>	<b>2</b>	<b>8</b>

## 5.6 Public Infrastructure and Services

All the shops outside and adjacent to the project alignment corridor include electricity (69% from the total sample), and some also include a water source (15 shops) (30.6% from the total sample). In relation to the shops located inside the existing stations, 5 shops (5.3%) are connected to electricity, two shop is equipped with an electricity meter and pay monthly bills, the rest pay to the railway station administration a monthly bill. The value of electricity consumption ranges from (100 to 220 EGP). one shop from the shops located inside the existing stations has a water source.

There is staff amenities in any of the shops (toilets, washing facilities) outside and adjacent to the Project alignment corridor. The shop workers rely on the use of public sanitation facilities attached to the nearby mosques. The shops located inside the stations depend on the facilities attached to the station, for a monthly fee (50 EGP) it is paid for the shop not for individuals, it is paid once a month and not for each individual.

<sup>31</sup> Two business owners who participated in the socio-economic survey confirmed that they do not pay rent for the shops, as these shops are their private property.

**Table 5-21 Distribution of PAPs according to Infrastructure and Services**

PAPs	Electricity	waters Source	Sanitation
Tenants of shops located in stations	5	1	-
Informal users within the Project alignment	-	-	-
Shops outside and adjacent to the Project alignment corridor	65	15	-
<b>Total</b>	<b>70</b>	<b>16</b>	<b>-</b>

## 5.7 Vulnerable Groups

Through the previous results presented in the above sections,

**Table 5-22** includes the identification of some vulnerable groups that are likely to be affected more than others by the Project.

The following table indicates that the illiterate has the highest percentage among the vulnerable groups with a percentage of (10.4%) from the total sample, followed by the elderly with a percentage of (8.9%), then the disabled and the Economic (sole bread winner) with a percentage of (5.2%) each, less category is the breadwinner woman by (2.2%) (3 women). The total of the vulnerable groups represents (32%) of the total PAPs.

**Table 5-22 vulnerable groups that are likely to be affected**

Vulnerable Groups	Tenants of shops located in stations	Informal users within the Project alignment	Shops outside and adjacent to the Project alignment corridor	Households outside and near to the Project alignment corridor	Total
PAPs with disabilities	-	1	1	5	7
Breadwinner woman	1	-	2	-	3
The elderly	1	2	5	4	12
illiterate	-	4	3	7	14
Economic (sole bread winner) <sup>32</sup>	2	3	2	-	7
<b>Total</b>	<b>4</b>	<b>10</b>	<b>13</b>	<b>16</b>	<b>43</b>

<sup>32</sup> An affected person whose income depends on more than one family for the main or only source of income in the family. The breadwinners, by contributing the largest portion of the family's income.

## 5.8 Social Aid and Government Support

According to the results of the socio-economic survey, none of the PAPs receive social aid or subsidies from government agencies or NGOs. Some referred only to some financial and in-kind aid (clothes, medicine, food) provided by relatives, which is provided on an irregular basis every two or three months and during seasons and holidays (Ramadan, Eid al-Fitr, Abd al-Adha).

## 5.9 Perceptions on the Project

**Table 5-23** shows the PAP perceptions on the Project, through which it is clear, that in general the perceptions are positive. None of the PAPs expressed their objection or rejection of the Project, but some of them had some concerns/ questions related to the Project's potential impacts.

**Table 5-23 PAPs perceptions on the Project**

PAPs Perceptions	landowners <sup>33</sup>	Tenants of shops located in stations	Informal users within the Project alignment	Shops outside and adjacent to the Project alignment corridor	Households outside and near to the Project alignment corridor
The Project is good	30	6	16	48	35
The Project is bad	2	2	5	17	5

The perceptions came as follows, whether in terms of positive or negative towards the Project:

- **The Project is good**

The following reasons came as the most important positives of the Project through the PAPs responses during the socio-economic survey and meetings with lan owners and residents in the areas adjacent to the Project alignment:

- Time saving for the Abou Qir railway trip, the metro will be faster than the railway
- Fast transportation
- Reduce congestion
- Safety for people / reduce accidents
- It will clean up the existing railway corridor
- It will open new crossings between the two ends of the city and increase accessibility

- **The Project is bad**

Concerns related to land acquisition procedures and potential impacts on livelihoods were at the forefront of negative perceptions of the Project:

- People might be affected in terms of livelihoods due to expropriation of their shops

<sup>33</sup> Number (32) is not the total number of landowners, but the number of landlords and their representatives who were part of the consultation. As previously mentioned, the RAP team has not yet received the formal list of landowners provide by the ESA/ASD via NAT.

- Reduce commercial activities
- Unfair validation of land prices by the ASD.

In addition to the above, the RAP Team conducted a media search to further inform the public perception on the Project.

### **Media Sources**

The sources reviewed range from national and online newspapers, as well as social media with a primary focus on Facebook. Overall, approximately 55 media sources were assessed over a three-month period to identify public perceptions of the Project, as well as the ongoing developments being reported on and media trends. Notable publications include Gomhouria Online, Al Ahram, Al Mal News, Masr Al Youm, Shoruk News among others. On social media, Facebook pages related to Alexandria matters were targeted to be included in the media search assignment.

### **Main Findings**

- The overwhelming majority of media published introduced basic information related to the project. Information related to the length, passenger capacity and reduced journey times were referenced on a weekly basis as a primary basis to nearly every article.
- The Abu Qir Project was reported on positively, with reports of state heads and ministerial representatives emphasizing the importance of the Project in alleviating traffic, promoting the enhancement of national infrastructure and developing the transport sector.
- Articles published related to meetings with relevant ministries and national stakeholders have all highlighted the importance of the Project, and its alignment with national efforts to enhance transportation in the country. The reports also indicated state representatives strongly endorsing the project, and its quick implementation.
- The Abu Qir Metro was referenced as part of a wider Ministry of Transport plan to promote clean energy train and sustainable transport on a national scale.
- In media sources covering national projects seeking to promote national and sustainable development, the Abu Qir Metro was listed as a key Project that will benefit its citizens alongside other transport projects in other governorates.
- There were less than five reports relating to shop owners, land and mosques along the Abu Qir Metro route and what the next steps would entail. It was reported that shop contracts would not be renewed once expired. Additionally, it was also reported that one mosque, the Nour Al-Salam Mosque was in the process of being removed. Regarding lands, it was reported that alternatives are being explored for tenants. It was also reported that a budget has been allocated for NAT to pay owners whose land is being expropriated.
- As weeks progressed into the media search, a period for the commencement of the Abu Qir Metro implementation began to be reported. The articles stated the construction would begin between January and February. Alternatively, it was reported afterwards that this would no longer be the case, and that a new date had not been determined.
- On Social media, posts indicating a January-February implementation period would be imminent, commenters indicated they were eager to see the project succeed, and that they do not want the

Project to be delayed further. Some commenters expressed their scepticism that the original implementation date would be accurate. Additionally, commenters also expressed their frustration regarding the implementation delay that was reported.

- Regarding the delay in implementation, one source reported that it was due to an implementing body not having been chosen yet. On social media, the delay was linked to school examinations, and ensuring students are comfortably able to rely on transport to and from educational facilities.
- On Facebook, where posts gathered engagement from users, there were no negative concerns or complaints related to the Project itself expressed. However, commenters were emphasizing their frustration at the continued delays in implementing the Project. Moreover, some commenters were curious and asking when the project implementation would commence.
- During the second half of January, media attention began to shift towards alternative transport during the implementation of the Abu Qir project, with numerous outlets reporting that multiple companies are seeking to be provide buses replacement services. On social media, it was also reported that trials had begun to assess the quality of alternatives prior to the suspension of the train.
- Coverage related to ticket prices was limited, with one news outlet reporting that the ticket price would be EGP 3. However, this may be the starting price for passengers seeking to use the metro for a segment of the station network.
- Challenges associated with the Manadara Tunnel have been reported on twice, in which it was also reported the tunnel would be filled to accommodate citizens.

## 6. PROJECT IMPACTS

This section describes Project impacts related to land acquisition, resettlement, livelihoods and accessibility during the construction phase. These impacts were identified as relevant to the Project based on the socio-economic survey and FGDs (including FGDs with women only from residents of areas close to Project alignment) conducted by the RAP team with all the groups affected by the Project as well as the groups likely to be affected by the construction activities.

### 6.1 Project Affected People

Impacts due to land acquisition and involuntary resettlement vary depending on the nature of Project activities and its land needs, the economic activities of the PAPs, and the type of land ownership and its use. Unavoidable impacts potentially resulting from expropriation and resettlement activities include loss of land, if land is owned by individuals (private property) rather than state owned land, impact on livelihoods as a result of changes in land use and access restrictions or loss of different types of assets.

The following table includes the PAPs identified by each affected group.

**Table 6-1 Project Affected People**

Project Affected People		Number of PAPS	
		PAP	No. of family members
<b>Owners of private lands<sup>34</sup></b>			
The depot land	Al Nahas Company <sup>35</sup>	1 Company	-
	Heirs of the Gawish family	184 persons	433
	Heirs of the Behairi family	12 persons	42
Bab Sharq Station land parcel		6 persons	18
Sporting Station land parcel		4 persons	14
<b>Tenants of shops located in stations</b>		8 Tenants	38
<b>Informal users within the alignment</b>			
Stationary informal vendors		15 persons	76

<sup>34</sup> The numbers in this table for the affected landowners are according to the results of the socio-economic survey conducted by the RAP team with representatives of the landowners, not according to the owners' lists issued by the ASD, these lists have not yet been issued.

<sup>35</sup> which is affiliated to the Ministry of Business Sector

Project Affected People	Number of PAPS	
	PAP	No. of family members
Informal mobile vendors	6 persons	32
<b>Potentially Affected PAPS<sup>36</sup></b>		
The Shops adjacent and outside the Project alignment corridor	There is no specific or approximate number of the PAPS under this group in the current stage.	
The Households outside and near to the Project alignment corridor		

## 6.2 Project Affected Businesses

### 6.2.1 Tenants of shops, kiosks and cafeterias located in stations

ENR rents the shops through the Ministry of Transport (MOT) Company for Investment and Development, which is responsible for the investment sector of the MOT as well as ENR.

The inventory of kiosks and shops undertaken for the RAP within the ENR stations identifies 4 kiosks, 1 shop and 3 cafeterias.

**Table 6-2 Affected shops, kiosks and cafeterias located in stations**

Business Type	Location	Total Number
Kiosks selling drinks/ sweets, newspapers and haberdashery	El Souqh, Sidi Beshr, Sidi Gaber and Abou Qir Stations	4
Cafeterias Selling Coffee / tea, and drinks	Al Zahiria, Sidi Beshr and Abou Qir Stations	3
Shop Selling mobile accessories and supplies	Victoria Station	1
<b>TOTAL</b>		<b>8</b>

### 6.2.2 The Shops adjacent and outside of the Project corridor

It has been confirmed by the consultant (SYSTRA) that shops adjacent and outside the railway will not be impacted by the Project's land requirements. However, construction activities may result in restricting access to and from these businesses as well as potential risks around damages to structures. No design change is expected in terms of physical displacement. In the event of any of the three risks above

<sup>36</sup> The design of the project, as well as the Project's needs for the land parcels that have been identified so far, do not require the removal of any houses or shops adjacent to the adjacent path, but residents of residential buildings and tenants of shops have been added to the affected given the possibility that they may be affected by the Project at a later stage (construction stage).

occurring, NAT will work with the consultant (SYSTRA) to: (i) provide alternative routes for access or replacement transportation services; (ii) compensate for damages to shops; and (iii) change the design in order to avoid shops being physically impacted.

The shops adjacent and outside the Project alignment corridor are located in the following station areas: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and El Montazah. These are the areas in which the Alexandria Metro Project alignment will be elevated (i.e. the viaduct area).

The RAP Team surveyed a sample of 20% of the total maximum number of shops in each location, so that a total sample of 65 shops distributed over the different locations were surveyed. The potential impacts of the Project on the shops adjacent and outside the Project alignment are included in **Section 9-1 Entitlement Matrix**.

### 6.3 Impacts on Land use and Livelihoods

**Table 6-3** summarizes the current uses of the land parcels (public/private) that will be acquired for the Project (permanent/temporary), as well as the estimated areas of these lands according to the Project's needs.

**Table 6-3 Private land use and area**

Land	Use	Area
<b>Permanent impact on private land use</b>		
Kafr Abdou Station and depot land	The Kafr Abdo station and the depot will be built on the Copper factory land (Al-Nahas), which is currently owned by the Ministry of the Public Business Sector, and a ministerial decision of land acquisition was already issued in this regard. The Copper factory land is mostly empty with a number of decommissioned factories that have not been in operation in the last decades.	204,436 m <sup>2</sup>
Bab Sharq Station land parcel (privately-owned land)	The land of Bab Sharq is used as an open-air car parking area. In addition, there is a car wash in the corner, which was observed during the RAP team's visit to the land parcel during April 2022. There are no plants or trees planted on the land, but there is a security guard room with water, sewage and electricity facilities.	632 m <sup>2</sup>
Sporting Station land parcel	The land parcel at the proposed Sporting Station is used as an open-air area to park cars belonging to the landowners. Part of the land is also used to store some building materials owned by the landowners.	887 m <sup>2</sup>
<b>Permanent impact on public land use</b>		
ENR property of the Abu Qir railway line	ENR owns the 21.7 Km railway corridor and all the facilities located within. Coordination between ENR and NAT is however ongoing to transfer the ownership of the alignment according to the Prime Minister Decree No. 2360 of 2020, which	—

Land	Use	Area
	considers the Abu Qir railway line with all its installations and facilities as a Public Interest Project.	
(13) Mosques built on ENR property	The Abou Qir train corridor currently includes (13) Mosques that were built on land owned by ENR inside the train corridor. Mosques will be removed for the construction of the Alexandria metro project, in coordination between NAT and ENR to transfer the ownership of the mosques' land that is included in the Abou Qir railway corridor land. Coordination was made between NAT and the Ministry of Endowments to take the necessary measures to create alternatives to the mosques that will be removed. According to the meeting held by the RAP team with the officials from Alexandria Endowments Directorate, some mosques are currently being rehabilitated and expanded in the areas adjacent to the project alignment, and residents in these areas rely on the existing mosques, as each area has at least 20 mosques open for prayer.	Included in the ENR corridor property area
ENR warehouse	The construction of Bab Sharq station will require an additional piece of land from the railway property, which is currently used as a warehouse. Coordination is made between NAT and ENR to transfer the ownership of the land for the Alexandria Metro project in accordance to Prime Minister Decree No. 2360 of 2020 (Appendix 1a: Land acquisition ministerial decision).	869 m <sup>2</sup>
Part of public parking area	The construction of Bab Sharq station will require an additional plot of land owned by the Alexandria Governorate, which is a state-owned entity, and is currently used as a public parking area. The ownership of the land will be transferred to NAT for the construction of the Alexandria metro project in accordance to Prime Minister Decree No. 2360 of 2020 (Appendix 1a: Land acquisition ministerial decision).	380 m <sup>2</sup>
The administrative building	The construction of the sporting station will require an additional plot of land that is currently used as an administrative building owned by the Alexandria Health Directorate, state-owned land. The ownership of the administrative building land will be transferred to NAT for the construction of the Alexandria metro project in accordance to Prime Minister Decree No. 2360 of 2020 (Appendix 1a: Land acquisition ministerial decision).	852 m <sup>2</sup>
<b>Temporary impact on private land use</b>		
Not determined yet	At the moment, no private lands have been identified that will be temporarily used during construction. NAT has confirmed that there will be no temporary land acquisition of the project	-

Land	Use	Area
	during construction, and the available areas within the ENR property will be relied upon (for more details see section 6.3.3)	

### 6.3.1 Permanent impact on land use

Currently, ENR owns the 21.7 km railway corridor and all the facilities located within. Coordination between ENR and NAT is however ongoing to transfer ownership of the alignment according to the Prime Minister Decision No. 2360 of 2020 which considers the Abou Qir railway line with all its installations and facilities as a public interest. The decision also includes the right of acquisition of any real estate or land needed for the Project (**Appendix 1a, 1b: Land Acquisition Ministerial Decree**).

The establishment of the project includes permanent land acquisition of three privately owned land, which are:

- Kafr Abdou Station and depot land,
- Bab Sharq Station land parcel, and
- Sporting Station land parcel

Table 6-3 includes a description of the current use of these lands according to the site visits that were carried out during conducting the socio-economic survey (April 2022).

### 6.3.2 Permanent impact on Livelihood

The results of s the socio-economic survey (April 2022) conducted by the RAP team showed some informal economic activities are present within the Project alignment corridor, which are classified into:

- Stationary Informal Vendors; and
- Informal Mobile Vendors.

These informal vendors within the Project alignment corridor is concentrated in the areas located near El Asafra, Sidi Bishr, Victoria, Ghebrial, Souq, Maamoura and Tosan stations. The economic activities of these uses are shown in **Table 5-6**.

### 6.3.3 Temporary impact on private land use

As a priority, the Contractor will attempt to avoid any land acquisition by utilising available ENR land at the existing stations as much as possible for storage of equipment and building materials during construction.

NAT confirmed that there will be no temporary land acquisition for the project during construction, and the available areas within ENR property will be relied upon. Labour camps will be limited to providing services available to workers at construction sites during daytime. No accommodation will be provided for workers at the construction sites. Local workers from Alexandria Governorate will be relied upon as much as possible.

The construction contractor is expected to rent accommodation apartments for workers from outside Alexandria, or rent apartments as offices adjacent to the project site. This will be ensured through a contractual agreement that will be signed under the terms agreed by the owner of the property and

the contractor. NAT will ensure that such agreements are legally binding and drawn up correctly to reflect terms and conditions that align with Lender requirements.

In the event that this cannot be avoided, the Contractor may need to rent a plot of land for this purpose. This will be carried out via voluntary lease agreements (with specified duration) between the Contractor and the landowner, which can be renewed if required.

NAT will include in the ESHS land acquisition Technical Specifications/ Requirements Section in the EPC Contract Works that: “temporary land acquisition outside ENR land during construction will be allowed only as commercial transaction (lease or rental) – no expropriation will be implemented for temporary land acquisition”. In the event that temporary land acquisition restricts access to residents and commercial buildings, the Contractor is obliged to provide alternative access routes that are suitable for residents, especially vulnerable groups (elderly, children, women and disabled people).

## 6.4 Impacts on Other Assets

### 6.4.1 Mosques across the Abou Qir Metro’s Route

The removal of some infrastructure within the alignment is unavoidable. The only major structures that will be removed are the mosques, primarily for the construction of the new metro stations (or construction of new segments to existing stations to accommodate increased metro traffic). A total of 13 mosques will be removed for the Abou Qir Metro Project.

The feasibility phase of the Abou Qir Metro Project included a study to clarify the existing status of the mosques and articulate why the mosques need to be removed. The impact of each mosque on the viaduct was shown through drawings and figures. It was finally concluded that 13 mosques required removal.

In Egypt, all privately or publicly built places of worship belong to the Ministry of Endowment. All the mosques are built without a permit on lands that were not in use by ENR. The ENR filed numerous trespassing cases regarding their ownership of the land being used by the mosques. All the mosques initially began as small prayer rooms, but eventually expanded to mosques via community members and residents gathering donations to expand these mosques. This process occurred over numerous years following the revolution, and underwent different stages, as reported to the consultant (SYSTRA) by the relevant imams. In recent years, all mosques regardless of size are affiliated with the Ministry of Endowment. The Ministry of Endowment is the responsible authority in charge of mosques and thus compensation related to mosques have been agreed with the ministry and the decision for establishment of alternative mosques will be decided in consultation with the community.

The Ministry of Transport has coordinated with the Ministry of Endowment for the removal of the affected mosques in exchange for a compensation value of 25,000,000 EGP (Refer to **Appendix 2**), allocated for the construction of other alternative or the expansion of an existing mosque, in order to reduce potential grievances from the local community that could arise from removing these mosques.

### 6.4.2 Government assets included in Bab Sharq and Sporting Stations

**Bab Sharq Station:** The construction of the Bab Sharq station will require additional land from one land parcel (869 m<sup>2</sup> owned by ENR currently used as a warehouse).

**Sporting Station:** The construction of the Sporting Station will require additional land (approximately 852 m<sup>2</sup>) occupied by an administrative building owned by the Health Directorate in Alexandria, which is a State-owned entity.

#### 6.4.3 The Households externally adjacent to the Project alignment corridor

Some sections of the Project alignment are close to houses and may be affected by construction activities, in particular houses that are located within the elevated (the viaduct) section. The construction work includes excavation which may affect nearby buildings depending on their construction condition.

The design of the Project, as well as the Project's needs for the land parcels that have been identified, do not require the removal of any houses or residential buildings. However, the residential buildings have been added to the entitlements matrix due to the possibility that houses adjacent to the metro track will be affected by excavation activities, in the viaduct section which are: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr.

#### 6.4.4 Permanent loss of trees

The construction of the project will result in the removal of some trees (about 5 palm trees) on the depot land. The results of the site visits conducted by the RAP team during the socio-economic survey showed the presence of a number of non-fruitful palm trees (during the time of the visit, April 2022, it was not fruitful). The trees will be counted by the ASD and the compensation will be determined according to the price list of the Alexandria Agriculture Directorate prior to land entry.

### 6.5 Impacts on Vulnerable Groups

The identification of the vulnerable groups, considering their interest and setting plans to mitigate for any negative impacts on them, lies within the core of social impact assessment. This mainly returns to the fact that vulnerable groups are more exposed to the implications of various Project impacts.

By definition, the vulnerable population are those groups of people who are typically excluded, disadvantaged or marginalized based on their economic, ethnic, social or cultural characteristics. Various groups could fit within this category; therefore, a more specific definition of vulnerable groups likely to be negatively or positively affected by the Project is needed.

**Section 5.7 Vulnerable Groups** provides a general overview of PAPs that are likely to be more vulnerable. Using this background information, a vulnerability analysis has been undertaken to identify more context specific groups of vulnerable people affected by the Project. These specific vulnerable groups are described below.

#### 6.5.1 Vulnerable groups related to impacts on livelihoods as a result of land acquisition

The Project has the potential to result in some unfavourable economic impacts during the construction and operational phases. The potential loss of income may arise during construction due to areas being closed either temporarily during construction or permanently due to relocation of some businesses within commercial areas. Economically displaced vulnerable groups include:

- The leased shops/ kiosks located inside the existing stations (currently ENR property);

- The informal users of the right of way (informal mobile vendors) who carry out economic activities inside the Project alignment corridor; given their illegal status, they and their families are likely to be affected economically and socially, especially in the absence of another source of income;
- In the event of removing the shops adjacent and outside the Project alignment, business owners and employees in these shops with no insurance coverage and no healthcare are likely to be affected. This group consisting of business owners and employees may be asked to evacuate their shops during the construction in case of any potential risk or impact. They will not be entitled to compensation as well as they are not legally eligible for healthcare or insurance, specifically elderly and female workers.

#### 6.5.2 Vulnerable groups in residential areas adjacent and outside to Project alignment

Construction activities at level crossings will lead to complete or partial closure of the crossings to pedestrians and vehicles, causing increased traffic congestion. This will reduce accessibility of the local community to various facilities around the construction sites. Vulnerable groups most likely to be affected by this are the persons with disabilities, the elderly and children.

**Table 5-22 (Chapter 5)** includes identification of vulnerable groups related to the Project according to the results of the socio-economic survey conducted by the RAP team.

## 6.6 Gender

Impact of land acquisition and livelihoods on gender was considered as part of the RAP, whether in the design of socio economic survey tools or FGDs that were undertaken with women in residential areas adjacent and outside the Project alignment corridor.

The results of the socio-economic survey on the household sample did not specify any potential impacts of the Project on women, as the sample response in this regard was (0) out of 40 questionnaires.

Regarding women's feeling of safety when roaming the area and using public transportation, most of them do not feel safe while using the current means of transportation their response was yes (23 vs. 16 no); this indicates that the currently available means of transportation does not achieve safety and protection for women. In addition, one of the women's expectations from the Project is to provide safe and clean transportation.

25% of the household sample identified women's exposure to gender-based violence and harassment (GBVH) as a major current issue in the Project affected areas. However, no concerns were raised in the women-only FGDs regarding the expectation of GBVH from the labour influx of the Project. In addition, NAT officials confirmed during the meetings held with them that all considerations for the Health, Safety and Security of the local communities surrounding the Project alignment have been considered within the Project design and community H&S aspects integrated into the Project design.

## 7. LAND ACQUISITION PROCESS AND PRINCIPLES

This chapter outlines the actual land acquisition and compensation process for the Abou Qir Metro Project. The Compensation Process described in this section applies to all PAPs identified for the Project, including landowners, shop tenants, mosques and informal users.

### 7.1 Land Acquisition Process

The regulation of the right to ownership in the constitution and the law (the new Egyptian Constitution issued at the end of 2014) stipulated in Article 33 that "the state guarantees the legitimate ownership of all kinds: "Public, Cooperative, Private and Endowment, and to protect it, in accordance with the law".

The Abou Qir Metro Project includes two types of land ownership, namely, state owned land (public lands) and individual land ownership (private lands). Thus, the land acquisition process adopted differs according to the type of land ownership.

#### 7.1.1 Acquisition of Public Lands

Public Lands (in Arabic *Amlak Amiriya*) is divided into:

- (1) the State's public domain that cannot be alienated (or taken away from or given away by the State); and
- (2) the State's private domain which can be alienated by the State generally through sale, lease, *Takhssiss* (i.e. conditional transfer on meeting certain criteria, such as keeping the land use unchanged and paying the remaining instalments of the land price).

The Law 10, 1990 stated that state public property may not be expropriated; rather the concerned administrative parties would enter into an agreement with respect to such property either by divesting the property in question from its public characterization or by re-appropriating the said property to another public use or entity.

The Abou Qir Metro Project includes plots of public lands, which are:

- ENR property within Abou Qir railway corridor east of the Egypt Station with all its facilities and utilities from passenger stations and facilities to serve the public (which includes 13 mosques impacted by the Project);
- A health unit building affiliated to the Health Directorate in Alexandria Governorate (to be used for the construction of the Sporting station);
- A training centre on the depot land;
- Part of the pedestrian walkway and part of a designated parking area belonging to Alexandria Governorate (to be used for the construction of Bab Sharq station); and,
- A plot of land belonging to ENR (for the construction of Bab Sharq station).

The allocation of public lands and real estates of government agencies whose data is included in the land acquisition ministerial decree shall be terminated. Subsequently, the usufruct right would be transferred over to NAT under the public benefit decision for the Alexandria Metro Project.

Reallocation of land is mainly between two governmental entities (from ENR and the Alexandria governorate to NAT and is predominantly free of charge (without compensation to be paid). This land transfer is enabled based on the public interest ministerial decree. **However, in certain conditions, compensation might be paid, as in the case of the majority of the depot land area that is owned by the Al-Nahas Company of the Ministry of Business Sector.** The procedures involved in the public land acquisition are presented in **Section 7.1.2** below.

### 7.1.2 Acquisition of Private Lands

Private Lands and/or property belonging to private persons (individuals or corporate) or to State private property, which may be alienated/ transferred freely. Article 35 of the Constitution 2014 states that: "private property is protected; and it shall not be expropriated except for the public benefit, and in return for fair compensation, to be paid in advance. All of this is in accordance with the Law".

The Abou Qir Metro Project includes private land parcels, which are:

- **Kafr Abdou Station and depot land: The Kafr Abdo station and the depot will be built on the former Copper factory land (Al-Nahas Company), which is currently owned by the Ministry of the Public Business Sector;**
- A private land parcel to be used for the development of Bab Sharq Station (currently used for parking, with a car wash); and
- A private land parcel to be used for the development of Sporting Station (currently used for parking).

**The process of land acquisition includes the following procedures and steps:**

The land acquisition process is described in **Figure 7-1** below.

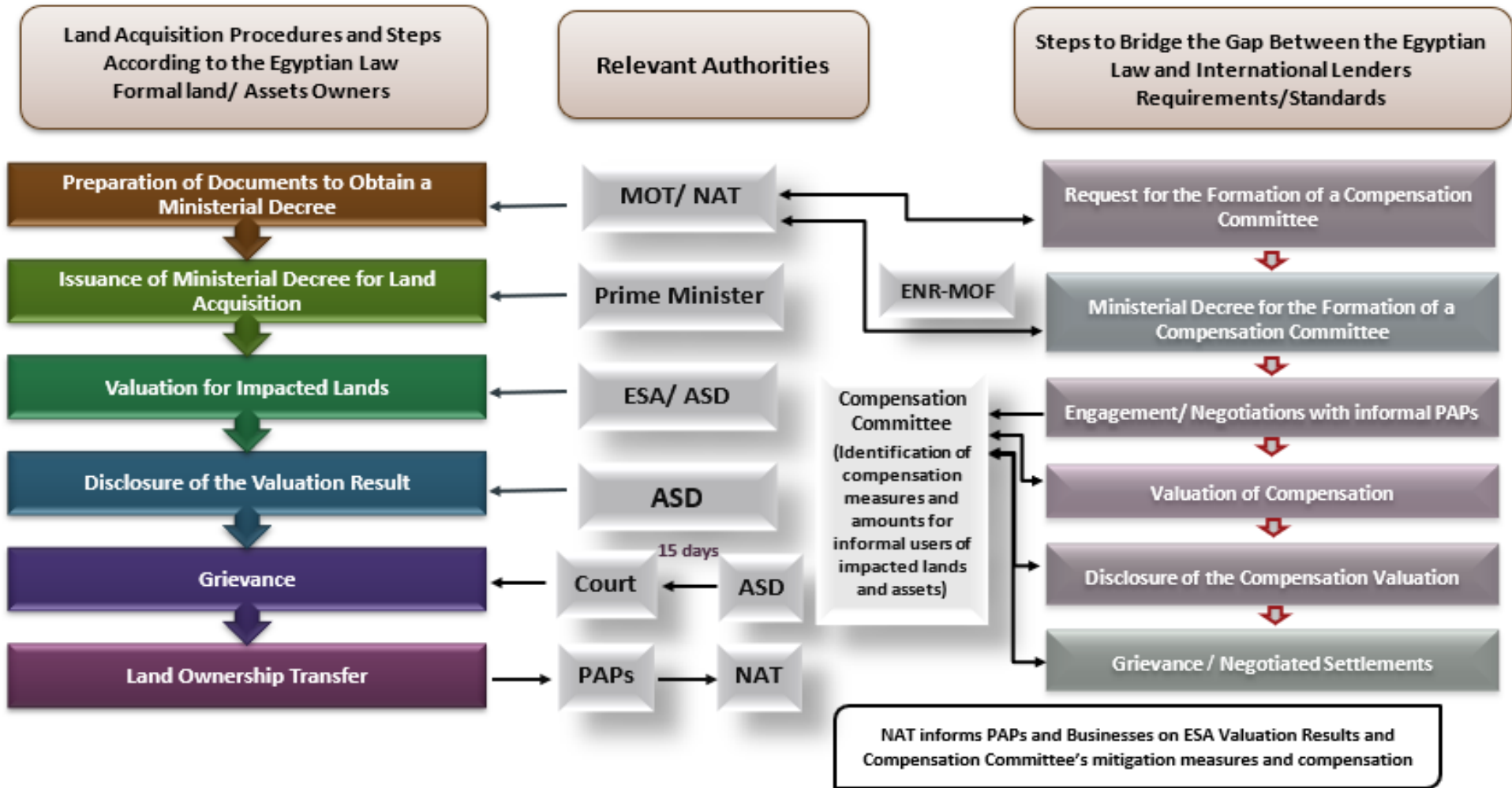


Figure 7-1: Land Acquisition Process

### **a) Land acquisition procedures and steps according to the Egyptian Law (Formal Land/ Assets Owners)**

According to the Law 10, 1990, the land acquisition process in Egypt involves: (i) declaration of public interest pursuant to a Presidential/ Prime Minister Decree accompanied with a memorandum on the required Project (Abou Qir Project) and a complete design plan for the Project and its buildings (Law 59/1979 and Law 3/1982 empowers the Prime Minister to issue the decree); and, (ii) the decree and the accompanying memorandum must be published in the Official Gazette.

#### **1. Preparation for Issue of a Prime Ministerial Decree of Land Acquisition due to Public Interest**

The following steps were taken to prepare for the issuance of the Prime Ministerial Decree of Land Acquisition for the Project:

- a) NAT technical consultant (SYSTRA) conducted the Project study<sup>37</sup>.
- b) A pre-identification for the areas subject to land acquisition and which require ownership transfer that are incompatible with the Project design that has been carried out.
- c) The Ministry of Transport (MOT) prepared and presented a memorandum to the Cabinet of Ministers to issue a decree of public interest for the Abou Qir Metro Project.
- d) NAT technical consultant (SYSTRA) conducted a field survey in order to confirm the outcomes of the desk study by collecting the study data on land acquisition for public interest.
- e) The Project owner (MOT)/Project authority (NAT) requested the Prime Minister to issue a decision of land acquisition based on the survey result.
- f) The Project owner (MOT)/Project authority (NAT) has deposited the estimated initial compensation amount into an escrow account until the final estimates of the compensation are completed. This evaluation is carried out by the Egyptian Survey Authority (ESA) and the Alexandria Survey Directorate (ASD) under national law.

#### **2. Issuing a Prime Ministerial Decree of Land Acquisition due to Public Interest**

A Prime Ministerial decree of land acquisition for public interest is issued with a memorandum covering the project description and necessary area for land acquisition for public interest. The decree is also published in Egypt's national gazette. This has already been completed for Abou Qir Metro Project, where the decree was published in the Official Gazette on November 19, 2020, as well as the decision issued on November 29, 2021, to add two plots of land of Bab Sharq and Sporting stations. The content of Appendix

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<sup>37</sup> This study is prepared by the party requesting the expropriation or the consultant assigned by this party. It includes a description of the Project, the general planning drawing of the Project, the locations and areas of the real estate / lands to be expropriated for the benefit of the Project (whether it is public or private owned land), in addition to, the Project feasibility for the public benefit and confirmation that the Project is among the categories of public benefit projects mentioned in Article (2) of the Law 10, 1990.

1(a) and 1(b) define the scope and jurisdictional boundaries of a governorate office and Court of First Instance in relation to land acquisition.

For the Alexandria Metro Project, the role of the governorate is represented in the directorates involved in the development of the Project that are administratively affiliated to the Alexandria governorate. For example, these Directorates would include:

- **Alexandria Survey Directorate:** Responsible for conducting the survey of the lands included in the expropriation decree and issuing a list that includes compensation value, the specified area planned for expropriation, the names of the landowners.
- **The Directorate of Housing and the Directorate of Real Estate Taxes in Alexandria** (in case of the existence of residential real estate mentioned in the Ministerial Decree of Land Acquisition due to Public Interest); and
- **Alexandria Directorate of Agriculture** (in case of agricultural lands mentioned in the Ministerial Decree of Land Acquisition due to Public Interest).

The role of the Court of First Instance in setting the jurisdictional boundaries for land, the court is the competent authority that investigates any complaints (i.e. in relation to compensation value, the specified area planned for expropriation, the names of the landowners, etc.) raised by PAPs. The Survey Directorate is the party concerned with the receipt of objections / grievances related to the previous items and submitting them to the Court of First Instance in the jurisdiction area where the land acquisition takes place, and the court, in turn, files the lawsuit, if required.

### 3. Property Valuation

An evaluation committee was formed, headed by the Director of the Valuation Department from the ESA (Land Acquisition Entity<sup>38</sup>) according to Law No. 10/ 1990 and its amendments by Law 187/2020, Law No. 24/ 2018 and Law No. 1/2015. The Committee is responsible for identifying the properties affected by a Project, as well as confirming the land/ assets location and land/ assets ownership (public/private), in addition to, estimating the initial land price. The compensation is usually determined in accordance with the prevailing price (the market price) for land in the vicinity of the land subject to expropriation. These prices are taken from recorded contracts that form a precedence in the Real Estate and Authentication Offices. It should be noted that the representatives of ESA are experts in evaluating land prices.

The Committee headed by the ESA issues an expert report that includes the value of land compensation. This procedure is completed for all the private lands included in the Project (the depot lands and the land parcels required for Bab Sharq and Sporting stations).

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<sup>38</sup> According to the Egyptian Law 10, 1990, the ESA and the affiliated directorates in the different governorates are the entity responsible for land acquisition in Egypt for public benefit projects.

The procedures for calculating the land price will be completed through an valuation survey carried out by a Committee from the Alexandria Survey Directorate (this procedure has been completed for the depot land only, and it is expected that it will take place in May 2022 for the lands parcels at Bab Sharq and Sporting stations) to identify the legal status of affected properties with the property owner. Once a compensation calculation is determined, **the Project owner (NAT) deposits the identified compensation amount (This procedure has been completed for the depot land only).**

#### **4. Disclosure of the Valuation Result**

The valuation survey result (i.e., surface area, location, owner name, compensation evaluation) is disclosed at the governorate office of ESA (Alexandria Survey Directorate) and District offices for one month. Land owners will be informed of the valuation result via official letter. The Project description, venue and the duration of disclosure for the valuation results will be announced in the Egyptian Gazette, official journal and two daily newspapers for one week (It is expected this procedure will take place in June 2022 for the owners of the depot land).

#### **5. Land Ownership Transfer**

If there are no grievances raised, property ownership will be transferred to the Project owner NAT through the signing of a land ownership contract.

#### **6. Grievance**

The legal avenues that can be employed for raising land acquisition related grievance can be considered under two levels.

1. Where the landowner requires further information with regards to the land acquisition requirements on subject land and other property (the legal status, the price of land, etc.), they are entitled to raise a grievance with the ASD office in particular the focal point responsible for grievances within 15 days of the land acquisition decision. Both the landowners and users are entitled grievance related to the valuation result.
2. Where the first avenue does not result in an agreement, the landowner and/or users would resort to take the issue to the court of first instance in Alexandria governorate (where acquisition will be conducted). Grievance is treated according to the Law No. 10/ 1990 and its amendments by Law 187/2020, Law No. 24/ 2018 and law No. 1/2015.

#### **b) Steps to Bridge the Gap Between the Egyptian Law and International Lenders Requirements/ Standards (Informal Land Users) Formation of the Compensation Committee**

The Compensation Committee is formed based on a request submitted by the head of the NAT to the Minister of Transport.

The formation of the Compensation Committee is internal within NAT and as such is not a requirement according to the Law No. 10/ 1990 for Land Acquisition, but rather this is a mechanism adopted by NAT to bridge the gap between the Egyptian Law and international Lenders requirements/standards.

The Minister of Transport approved the formation of the Compensation Committee for the Abou Qir Metro Project on February 24, 2022 (**Appendix 2**). The role and responsibilities of the Compensation Committee are:

- Negotiating with informal PAPs (informal Users and vulnerable Groups) Categories that not included in Egyptian Law. The Compensation Committee engages with the PAPs to determine the value of impact on the subject asset(s) and determines a value for negotiation. The assessment works carried out by the Compensation Committee considers informal users of impacted assets as well as vulnerable groups. The Committee will propose compensation at full replacement cost or other livelihood restoration measures that replace and restore (if possible, improve) livelihoods before pre-Project levels;
- Receiving grievances, whether from (formal) land owners or informal users. The committee assists the official owners in communicating with the relevant government authorities to resolve the complaint;
- Receiving any grievances related to compensation; and
- Conducting consultation activities with informal PAPs.

The Compensation Committee established to the Alexandria Metro Project consists of 11 members representing NAT (9 representatives), ENR (1 representative) and General Authority for Governmental Services - Ministry of Finance (1 representative).

## 7.2 Identification of Right Holders

The regulation of ownership rights according to Egyptian Law are guaranteed by the Constitution (Article 33 of the 2014 Constitution), as mentioned above. It is the Government of Egypt's policy to pay compensation or offer assistance to people whose lands and properties are affected by projects undertaken by the Government. Amendments introduced to the 1990 Egyptian land acquisition law (Law 10/1990) through Law 24/2018 stipulate prior to the asset inventory, an appointment date will be announced publicly and "concerned parties" shall be notified in writing and "all owners and right holders" will be convened to appear before the responsible committee conducting the inventory on the Project site to identify/ clarify properties and ownership rights. Under this formulation, the scope of the Law has been expanded to include "right holders", in addition to, formal owners however the definition of "right holders" in the context of this amendment remains unclear. It may be understood that right holders without formal ownership documents may be considered eligible for compensation, however the rights

of the informal users (stationary and mobile vendors) remains unclear<sup>39</sup>. In the Abou Qir Metro Project, the owners and the land right holders were identified according to the formal ownership by the ASD. Although the statement remains unclear for informal users the Alexandria Metro Project will comply with international requirements.

### 7.3 Identification of Informal Users and Vulnerable Groups

Egyptian legislation does not recognize the rights of informal users/ squatters and vulnerable groups. Informal users and vulnerable groups (stationary and mobile vendors) within the train corridor were identified according to Lender's requirements. A Compensation Committee formed by representatives of ENR, Ministry of Finance and NAT have compiled a list of the informal users. The RAP team verified the list and conducted a socio-economic survey of these informal users. A final list of Informal users has been prepared on 29 May 2022.

### 7.4 Cut-Off Date

Lenders Standards/Requirements identify a cut-off date in order to avoid unjustified claims for compensation.

Although there is no cut-off date under the Egyptian laws, Article (22) of the Egyptian Law 10, 1990 states that: "any action or procedure that takes place on the land mentioned in the Ministerial Decree, such as constructing buildings, lease contracts, or planting crops/ trees after the Ministerial Decree has been published in the Official Gazette, will not be included in the compensation valuation."

The cut-off date in Abu Qir Project will differ according to the various components of the Project. The cut-off date for all assets falling within ENR property, namely the rented shops, the mosques and the copper factory land the date of publication of the land acquisition ministerial decree is considered the cut-off date is 19 November 2020, as well as the decision issued on 29 November 2021 for the lands of Bab Sharq and Sporting stations. Whereas, the cut-off date for all informal mobile and stationary vendors is the date the Compensation Committee completes the inventory within the scope of the Project alignment and outside (17 May 2022).

### 7.5 Eligibility Categories and Principles

Under Egyptian law, the only people and entities entitled for compensation are those with registered property rights. For example, these include registered landowners, occupants, users and those with registered third party rights or those who have legally obtained the right to register their title but whom, for some reason, have not completed registration.

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<sup>39</sup> For more details, see Appendix 3 National Regulations Related to Involuntary Resettlement.

Under the Lender's requirements, all the land needed for a Project is subject to Eligibility Criteria for compensation, which includes the following categories:

- Category 1: those who have formal legal rights to land (including customary and traditional rights recognized under Egyptian Law);
- Category 2: those who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws; and
- Category 3: Those who have no recognizable legal right or claim to the land they are occupying (e.g. squatters).

Under this Project all the categories (1, 2 and 3) will be considered for compensation in accordance with Lender's requirements. All PAPs will be compensated for their loss of assets, regardless of their legal status. Compensation includes financial or technical support so that PAPs are able to restore their livelihood to pre-displacement levels or to levels prevailing prior to the beginning of Project implementation, whichever is higher.

According to Lender's requirements, the following table presents the three categories of eligibility involved in the Project and the method of entitlement.

**Table 7-1: Eligibility Criteria**

Eligibility Categories	Entitlement
<p><b><u>The first criterion for eligibility will be those with legal title.</u></b> Individuals who have formal legal rights to land (including customary and traditional rights recognized under the Egyptian laws)</p> <p>Based on socio-economic surveys, stakeholder consultations and field observations, the following PAPs have been identified:</p> <ul style="list-style-type: none"> <li>▪ Owners of land designated for the depot and new Kafr Abdou, Bab Sharq, and Sporting stations; and</li> <li>▪ Kiosks and cafeterias/ shop tenants inside the current stations/ corridor and outside the railway track (if needed) across the Abou Qir Metro's Route.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Compensation for loss of land and assets at full replacement cost.</li> <li>▪ In case of physical relocation, provide assistance during relocation (i.e. moving allowances) and residential housing.</li> <li>▪ Support after displacement, until livelihoods and standards of living are restored to pre-displacement levels.</li> <li>▪ Livelihood restoration assistance in addition to compensation measures (e.g. credit facilities, training, job opportunities).</li> </ul>

Eligibility Categories	Entitlement
<p><b><u>The second criterion for eligibility will be the legal status.</u></b> Individuals/ entities who do not have formal legal rights to land, but have a claim to such land or assets (provided that such claims are recognized under Egyptian laws or become recognized through a process identified in the resettlement plan). For example, the 13 mosques impacted by the Project.</p> <p>Based on socio-economic surveys, stakeholder consultations and field observations, the following PAPs have been identified:</p> <ul style="list-style-type: none"> <li>▪ Tenants of shops/ kiosks/ cafeterias whose contracts have expired, and they are still paying the rent.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Compensation for loss in land and assets at full replacement cost.</li> <li>▪ In case of physical relocation, provide assistance during relocation (i.e. moving allowances) and residential housing.</li> <li>▪ Support after displacement, until livelihoods and standards of living are restored to at least pre-displacement levels.</li> <li>▪ Livelihood restoration assistance in addition to compensation measures (e.g. credit facilities, training, job opportunities).</li> </ul>
<p><b><u>The Third criterion for eligibility will be,</u></b> Individuals who have no recognizable legal right or claim to the land they are occupying (i.e. stationary informal vendors, mobile informal vendors).</p>	<ul style="list-style-type: none"> <li>▪ Compensation for their investments on the land.</li> <li>▪ In case of physical relocation, provide assistance during relocation (i.e. moving allowances) and residential housing.</li> <li>▪ Support after displacement, until livelihoods and standards of living are restored to at least pre-displacement levels.</li> <li>▪ Livelihood restoration assistance in addition to compensation measures (e.g. credit facilities, training, job opportunities).</li> </ul>

## 7.6 Challenges of Land Acquisition

- **There are no specific and clear valuation methodology for land and property.** Although Egyptian Law requires the valuation be based on market prices at the time of land acquisition, there is no clear methodology for such valuation, and there are no unified and publicized guiding principles on how to determine the prevailing prices. Appropriate valuation criteria should be based on full replacement costs, and the valuation framework should be available for review.
- **Lack of a unified institutional framework responsible for identifying all PAPs and evaluating compensation.** Law 10, 1990 and its amendments give the ESA and the affiliated governorate department the responsibility for implementing land acquisition for public interest projects. However, there is no unified institutional framework for taking responsibility for the census, asset inventory and

compensation disbursement for both formal and informal PAPs. There is no mechanism/criterion for compensating the informal users of the land, or how to estimate the appropriate compensation.

- **The gap in the implementation and sequence of land acquisition procedures.** Time factors and delays to navigate through a formal expropriation process. Land acquisition procedures take a long time. Where there is a significant gap between the cut-off date and RAP implementation, the Project carries the risk of additional right holders to emerge, the validity of the valuation conducted for impacted assets, which may result in the need for updating the census and assets inventory. This is reflected in the Project implementation procedures, and creates concern among PAPs in relation to entitlements and potential change in property values.
- **Grievance/objection period.** Law 10, 1990 and its amendments state that any complaints against acquisition should be resolved by the ESA. Affected parties are only allowed to file a complaint for 15 days after the final list of PAPs is published by the implementing agency (ASD). Land owners consider this time frame to be too short, and thus complainants tend to rely on courts for a final resolution of their complaints. This makes the grievance redress mechanisms very expensive and long-term.

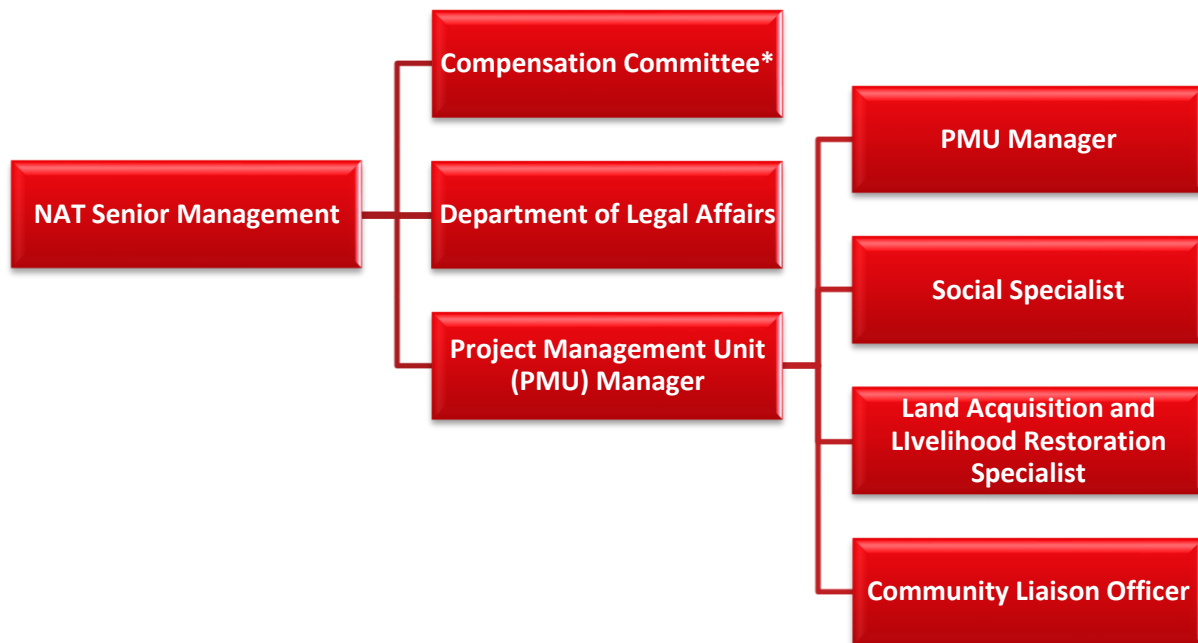
## 8. INSTITUTIONAL ARRANGEMENTS

The planning, preparation and implementation of this RAP involves distinct processes and different responsible parties. This chapter details the organisations involved, as well as their roles and responsibilities to ensure that PAPs and affected communities are resettled and compensated for any losses, so that their livelihoods and standards of living are restored to at least pre-Project levels.

### 8.1 Organisational Structure

The National Authority of Tunnels (NAT) is responsible for the design and development of the Project. NAT is a Government Agency under the jurisdiction of Ministry of Transport, which was incorporated in 1983, for executing Metro Lines and electric traction rail transport projects inside and outside Egypt. NAT will have ultimate responsibility for the Project and will oversee the implementation of the Lender’s requirements during the Project’s design, construction and operation. NAT will establish a Project Management Unit (PMU) under the Environmental Affairs Department to implement the Project that will be responsible for overseeing the implementation of this RAP.

NAT’s organisational structure for the Project is shown in **Figure 8-1**.



**Figure 8-1: NAT's PMU Organisation Structure**

\*The Compensation Committee comprises representatives of NAT Department of Legal Affairs, ENR Property Department and Ministry of Finance General Authority for Governmental Services. Where found necessary the Committee is like to call upon the specialty of experts from the Alexandria Governorate Department of Real Estate and Taxes.

### 8.2 Coordination Arrangements

Figure 8-2 provides an organogram of the resettlement process, and the interface between the different organisations involved in the process:

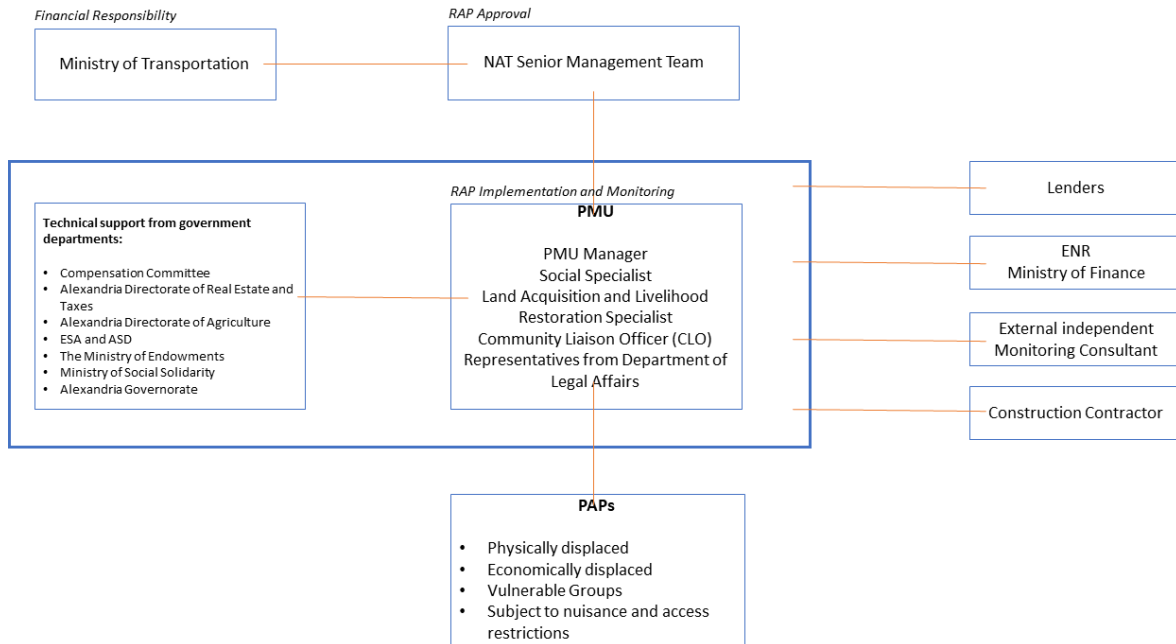


Figure 8-2: Resettlement Organisational Structure

### 8.3 Roles and Responsibilities for Land Acquisition

NAT’s senior management team and the PMU Manager will have ultimate responsibility for the effective implementation of this RAP. Table 8-1 depicts the organisations involved in resettlement and compensation for the Project and describes specific roles and responsibilities.

Table 8-1: Compensation Costs for Land (where in-kind replacement is not feasible)

Entity	Roles and Responsibilities
<b>Ministry of Transportation (MOT)</b>	The Ministry of Transportation is the entity requesting expropriation for public interest and concerned with land acquisition. The ministry will: <ul style="list-style-type: none"> <li>Request the land acquisition for public interest as described in <b>Section 7.1.2 Acquisition of Private Lands</b>; and</li> <li>Approve the deposit of the compensation full value according to the estimates of the Alexandria Survey Directorate ASD through NAT, on the grounds that it is the authority responsible for the Project under the MOT.</li> </ul>
<b>NAT Senior Management</b>	NAT Senior Management will review and approve reports and documents associated with Project implementation. They will be responsible for establishing the PMU and

Entity	Roles and Responsibilities
	<p>appointing technical specialists to effectively audit the RAP implementation. They will ensure that all relevant activities are executed in line with relevant national legislation and Lenders requirements and EIB Standard 6. With specific regards to this RAP, NAT Senior Management will:</p> <ul style="list-style-type: none"> <li>• Approve the RAP (after Lender’s approval);</li> <li>• Establish a PMU to implement the Project RAP;</li> <li>• Ensure availability of sufficient budget for resettlement, compensation and other livelihood restoration assistance and support through both national legislation and the RAP Fund (refer to <b>Section 9.6: Compensation Application and Negotiation Process</b> for a description of the funding sources adopted for this Project);</li> <li>• Provide and disperse funds for mandatory and supplementary compensation - such as in cases of income loss, livelihood stabilization and support for socially vulnerable people, according to the valuation of the Compensation Committee;</li> <li>• Provide an inventory of the affected shops and determine their legal / contractual status through the ENR and MOT Company for Investment and Development</li> <li>• Announce the project description and the place and duration of disclosure of the evaluation results in the Official Gazette, and two daily newspapers for a period of one week (including disclosure of the names of land owners and assets entitled to compensation).</li> </ul>
PMU	<p>The PMU will be responsible for the overall RAP implementation to ensure any potential impacts from the Project area is addressed in compliance with Egyptian legislation and the Lenders requirements. The PMU will:</p> <ul style="list-style-type: none"> <li>• Ensure land acquisition and resettlement activities comply with Lender’s requirements and this approved and disclosed RAP;</li> <li>• Ensure engagement of other technical specialists to assist in implementation of the RAP, including valuation, monitoring and evaluation activities;</li> <li>• Ensure coordination and liaison across NAT departments, relevant ministries and governorate departments involved in implementation of all RAP activities;</li> <li>• Propose and take appropriate corrective actions as needed during the RAP implementation;</li> <li>• Maintain records and documentation of the compensation process;</li> <li>• Provide financing and assistance to vulnerable groups in cooperation with the Ministry of Social Solidarity and the active NGOs in Alexandria Governorate;</li> <li>• Support and maintain close coordination with Alexandria Governorate in the implementation of the RAP;</li> <li>• Support the PMU Manager in high level decision-making, if required; and</li> <li>• Oversee functionality and performance of the grievance redress mechanism for the Project supported by Project CLO, Compensation Committee, PMU Manager, Social Specialist, Land Acquisition and Livelihood Restoration Specialist (other channels should grievances include the General Government Complaints Hotline (the Cabinet) and the Citizens’ Complaints Department in NAT, which receives complaints submitted to NAT about any project and transfers them to the competent departments to take the necessary measures) who will be actively involved in receiving and addressing grievances. The CLO within the PMU will also conduct regular inspections of records relating to grievances received and their resolution.</li> </ul>

Entity	Roles and Responsibilities
<b>PMU Manager</b>	<p>The PMU Manager will be responsible for leading expropriation activities in accordance with national legislation. They will be supported by experts within the PMU, and other departments, as required. The PMU Manager will be responsible for:</p> <ul style="list-style-type: none"> <li>• Notification and follow up (if required) with PAPs on upcoming land/property acquisition;</li> <li>• Preparing documents for the negotiation of compensation with PAPs, including additional compensation/allowances in accordance with Lender's requirements; formalising agreements with PAPs, processing of timely and correct compensation payments to meet national requirements, Lender's requirements to PAPs, following up with registration of land / property titles;</li> <li>• Representing NAT during any expropriation court cases, when necessary; and</li> <li>• Assisting in receiving, recording, resolving and reporting of grievances related to land / property acquisition process related to the Project.</li> <li>• Guiding, and where necessary supporting resolution of complex grievances.</li> </ul>
<b>Social Specialist</b>	<p>The PMU Social and Resettlement Specialist is responsible for overseeing the implementation of the RAP, in addition to, Lender's requirements in relation to expropriation, with support from the Land and Livelihood Restoration Specialist. The PMU Social and Resettlement Specialist will be responsible for:</p> <ul style="list-style-type: none"> <li>• Collecting the data for the preparation of the bimonthly RAP internal monitoring reports;</li> <li>• Monitoring and managing any immediate issues of non-compliance with the RAP and remedial action required;</li> <li>• Appointing the External Independent Monitoring Consultant;</li> <li>• Monitoring the temporary land acquisition activities of Contractor(s), and the implementation of associated RAP activities;</li> <li>• Overseeing the implementation of the <b>SEP</b>, with support from the Community Liaison Officer (CLO); and</li> <li>• Overseeing and supporting RAP related grievance management including periodic reporting of grievances to PMU.</li> </ul>
<b>Land Acquisition and Livelihood Restoration Specialist</b>	<p>Responsible for implementing the RAP, livelihood restoration plan, in addition to, Lender's requirements in relation to expropriation. The Land Acquisition and Livelihood Restoration Specialist will be responsible for:</p> <ul style="list-style-type: none"> <li>• Following and keeping records of all payments made under national law and payments made from the RAP Fund in collaboration with disbursing parties;</li> <li>• Keeping records of land acquisition related grievances;</li> <li>• Planning, coordinating land acquisition related engagement activities with CLO;</li> <li>• Updating of RAP if needed (i.e. during RAP implementation if new impact groups emerge etc.);</li> <li>• Inputting to the preparation of the bimonthly RAP internal monitoring reports; and</li> <li>• Reporting (to Social Specialist) any immediate issues of non-compliance with the RAP and remedial action required.</li> </ul>
<b>Community Liaison Officer (CLO)</b>	<p>Responsible for implementing the <b>SEP</b>, including responsibility for the preparation of consultation material for, consulting and engaging with PAPs. They will also conduct regular inspections of records relating to grievances received and their resolution. The CLO will be responsible for:</p> <ul style="list-style-type: none"> <li>• Following and recording of grievances related to land acquisition;</li> </ul>

Entity	Roles and Responsibilities
	<ul style="list-style-type: none"> <li>• Planning, coordinating and implementing land acquisition related engagement activities with Land Acquisition and Livelihood Restoration Specialist, Keeping and reporting records of completed of engagement activities to Social Specialist;</li> <li>• Updating of SEP when needed;</li> <li>• Preparing and distributing flyers, leaflets, brochures, information packages on the Project to relevant stakeholders;</li> <li>• Conducting meetings, interviews and group discussion with impact groups and other stakeholders regularly and keep records of these meetings;</li> <li>• Inputting to the preparation of the bimonthly RAP internal monitoring reports; and</li> <li>• Reporting (to Social Specialist) any immediate issues identified through grievance mechanism or engagement activities that may be in non-compliance with the RAP.</li> </ul>
<b>Lenders</b>	<p>The EBRD, EIB, AIIB and AFD (collectively known as 'the Lenders') are considering financing the Project. The Lenders will require the submission of reports that monitor the environmental and social performance of the Project against their specific policies for mitigating environmental and social issues and impacts. This will include the implementation of this RAP. The Lenders role is to provide their feedback for and approval of the RAP, as well as, to issue a no objection letter to start construction. The Lender's will be provided with regular information that confirms NAT's monitoring of the land acquisition process and compliance with the Lender's policy requirements, national legislative requirements and EU legislative requirements, as described in <b>Chapter 3: Legislative Framework</b>.</p>
<b>ENR</b>	<p>The ENR Property Department is responsible for providing NAT with maps showing the ENR properties located within the scope of the Project.</p> <p>ENR compiled an inventory of the tenants of the shops located in the existing stations, in addition to, the occupants inside the Project alignment corridor.</p> <p>A representative of ENR is a member of the Compensation Committee.</p>
<b>Ministry of Finance</b>	<p>The Ministry of Finance is responsible for depositing the financial allocations for each ministry in accordance with the decisions of the President of the Republic and the Prime Minister. Therefore, it is responsible for allocating the compensation included in the land acquisition ministerial decision within the financial provisions of the MOT for the benefit of the Project.</p> <p>The Compensation Committee includes a representative from the General Authority for Governmental Services, which affiliated to the Ministry of Finance.</p>
<b>External Independent Monitoring Consultant</b>	<p>The External Independent Monitoring Consultant (appointed by NAT) will conduct in-depth external monitoring reviews, and report progress against the RAP every 6 months as described in <b>Chapter 12: Monitoring and Reporting</b>. This consultant will also complete a spot check of a sample of valuation reports developed by NAT.</p>
<b>Construction Contractor</b>	<p>The Contractor will appoint a Land and Permits Officer, responsible for temporary land acquisition during construction, in accordance with the processes and compensation measures in the RAP, including land entry and exit protocols, and permissions to enter permanently acquired land for the Project. The Land and Permits Officer is also responsible for the return of land to either NAT or landowners, and the resolution of any grievance related to the Contractor's land acquisition processes, and for obtaining any permits required from the local authorities.</p>

Entity	Roles and Responsibilities
<b>Compensation Committee</b>	<p>The Compensation Committee is formed to bridge the gap between national law and international requirements/ standards for lenders. This is a mechanism adopted by NAT to compensate PAP categories not covered by Egyptian Law 10/1990. The Compensation Committee is formed based on a request submitted by the head of the authority to the Minister of Transport.</p> <p>The role and responsibilities of the Compensation Committee are:</p> <ul style="list-style-type: none"> <li>• Negotiating with informal PAP Categories that not included in Egyptian law (informal users and vulnerable groups). The Compensation Committee engages with the PAPs to determine the value of impact on the subject asset(s) and their livelihoods to determine a value for negotiation. The assessment works carried out by the Compensation Committee considers informal users of impacted assets as well as vulnerable groups. The Committee will propose compensation at full replacement cost or other livelihood restoration measures that replace and restore (or if possible improve) livelihoods before pre-Project levels;</li> <li>• Receiving grievances, whether from (formal) land owners or informal users. The Compensation Committee assists the official owners in communicating with the relevant government authorities to resolve such grievances, if raised;</li> <li>• Working in collaboration with CLO, Land Acquisition and Livelihood Restoration Specialist and Social Specialist in receiving and resolving any grievances received related to compensation; and</li> <li>• Conducting consultation activities with informal PAPs.</li> </ul>
<b>Alexandria Governorate, Directorate of Real Estate and Taxes</b>	<p>The Alexandria Governorate Directorate of Real Estate and Taxes conducts land acquisition and compensation payment within Egyptian legal framework. It provides required documents for ownership/tenure status in affected communities.</p>
<b>Alexandria Directorate of Agriculture</b>	<p>The Alexandria Directorate of Agriculture is responsible for the valuation of trees according to the price list of trees and crops that is updated annually and approved by the Directorate of Agriculture and the Governor.</p>
<b>ESA and ASD</b>	<p>The ESA is responsible for evaluating private land parcels subject to expropriation and calculating the compensation to be paid out to landowners. The ASD will be responsible for:</p> <ul style="list-style-type: none"> <li>• Conducting the survey of the lands and assets that included in the expropriation decree;</li> <li>• Issuing a list that includes surface area planned for expropriation, location, owner name, compensation evaluation;</li> <li>• Sending an official notification to owners of land and assets clarifying surface area, location, owner name, compensation evaluation; and</li> <li>• Receiving objections/ grievances related to the previous items and submitting them to the Court of First Instance in the jurisdiction area where the land acquisition takes place and the court, in turn, files the lawsuit, if required.</li> </ul>

Entity	Roles and Responsibilities
<b>The Ministry of Endowments</b>	The Ministry of Endowments coordinates the process of demolishing mosques <sup>40</sup> with the Ministry of Transport. The ministry conducts consultation activities with community members and based on this consultation establishes alternative mosques or contributes to the establishment and expansion of existing mosques prior to construction.
<b>Department of Legal Affairs</b>	The Department of Legal Affairs is responsible for legal issues relating to land tenure and/or ownership and resolving disputes.
<b>Ministry of Solidarity</b>	The Ministry of Solidarity is responsible for reducing the impacts of resettlement on vulnerable groups (stationary informal vendors, mobile informal vendors) during and after resettlement by conducting a socio-economic survey of PAPs.
<b>Alexandria Governorate</b>	Governorate Authority and Distracts, Responsible for <ul style="list-style-type: none"> <li>• Providing the construction permits for new stations,</li> <li>• Coordination between the project and the Traffic and Roads Department to facilitate construction along the road and crossings,</li> <li>• Participate with the Compensation Committee during the payment of compensation for informal users</li> </ul>

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<sup>40</sup> Mosques built on ENR land along the Project alignment.

## 9. ENTITLEMENTS AND COMPENSATION

This chapter describes the eligibility of categories of displaced persons for compensation and other resettlement assistance. The chapter includes an entitlement matrix that addresses the categories of losses and entitlements related to the relevant Abou Qir Project components for all PAPs according to the type of impact and loss, including landowners, shop tenants, mosque and occasional users. The chapter also includes a description of the valuation methodology (Section 9.5) for losses to determine the cost of their full replacement, compensation and to provide further livelihood assistance and support where needed.

### 9.1 Entitlement Matrix

People, businesses and households recorded by the census and identified during the assets inventory are entitled to compensation and livelihood assistance. Entitlements are defined according to the categories of affected people/households/businesses with consideration of the level of impact caused by the land take requirements of the Project. Entitlements under the Abou Qir Metro Project can be classified under three categories; i) compensation for land and assets (and access to land and assets); ii) compensation for lost net income; and iii) resettlement/livelihood restoration assistance. There are different categories of people and businesses affected by the Abou Qir Metro Project who are entitled to compensation and socio-economic recovery as described in Section **Error! Reference source not found..**

All PAPs identified prior to the cut-off date shall be entitled to compensation, according to the compensation principles of land acquisition law and the Lender’s requirements as described in Chapter 3. It is important to note that the compensation value is based on the full market price prevailing in the governorate in addition to transaction costs for the replacement of the subject asset which would meet the full replacement cost requirements of the Lenders.

The approved Entitlement Matrix was discussed and agreed in a meeting with the Compensation Commission on 9 June 2022 with all the participants, with final approval by NAT on X June 2022.

The following table presents the entitlement matrix for the different categories of PAPs who were identified in the Abou Qir Metro Project according to the type of loss/ impact on PAPs.

Table 9-1: Entitlement Matrix for Affected Persons

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
<b>Permanent loss of land (complete or partial)</b>			
Loss of urban commercial non-arable land or access to it	Landowner/ Shareholder	<p>Provide cash compensation<sup>41</sup>, in accordance with national requirements, for loss of land, calculated using market price within the year of the ministerial decree.<sup>42</sup></p> <p>The cash compensation provided also includes 3 years’ lost income that would have been generated through this land.</p> <p>Landowner has the right to request the purchase and compensation of any portion of the land if the remaining section of the land parcel is not economically usable (unviable land).</p>	<p>AND</p> <p>Provide cash compensation at full replacement cost, including cash compensation for the cost of moving, or the cost of moving any movables from the land as a result of the land acquisition for the project. This will apply for the lands described in “Section <b>Error! Reference source not found.</b> Land Acquisition of Private Lands”.</p> <p><b>Other Allowances:</b></p> <p>Assistance through the RAP fund to be provided for, , transportation for moving to new location. Further details on legal costs are provided in <b>Section 9.2</b> below.</p>

<sup>41</sup> According to the results of the consultation activities conducted by the RAP team with the landowners, they have no objection to cash compensation.

<sup>42</sup> This compensation is proportional to the percentage of land owned by each shareholder at the time of acquisition. This will apply for the lands described in “Section 7.1.2 Land Acquisition of Private Lands”: (1) The depot (El Nahas land); (2) The new station (Bab Sharq); and (3) The new station (Sporting). This compensation amount includes compensation for non-use of the land for a maximum of three years and transaction costs included, the land owner does not bear any legal costs for registration or transactions of ownership.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of commercial land or access to it	Formal tenants and formal users of land	No provision is provided under National law.	<p>Rental allowance in accordance with the conditions of the rental agreement for 3 months<sup>43</sup>.</p> <p>Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate.</p> <p><b>Other Allowances:</b></p> <p>Tenants notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement).</p> <p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration.</p> <p>Livelihood restoration programmes will be developed as described in <b>Chapter 11: Livelihood Restoration Plan</b> and offered to this category of PAP by NAT on a case by case basis to include access to temporary and permanent employment opportunities.</p>

<sup>43</sup> Rental allowance will be provided for a period of 3 months as a minimum, with the possibility of extending the rental allowance by a further month or increased amount assessed and agreed on a case by case basis.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of urban commercial land or access to it	Informal tenants and informal users of land	No provision is provided under National law.	<p>Rental allowance in accordance with the conditions of the rental agreement for 3 months.</p> <p>Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate.</p> <p><b>Other Allowances:</b></p> <p>Tenants notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement).</p> <p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration.</p> <p>Livelihood restoration programmes will be developed as described in <b>Chapter 11: Livelihood Restoration Plan</b> and offered to this category of PAP and they will include access to temporary and permanent employment opportunities.</p>

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
<b>Permanent loss of Structures, Commercial Buildings and Trees (complete or partial)</b>			
Loss of structures, commercial buildings and trees or access to them	Owner(s)	Provide cash compensation, in accordance with national requirements, for loss of assets, calculated using market price within the year of the ministerial decree. This compensation is proportional to the percentage of asset owned by each shareholder at the time of acquisition.	<p>Provide cash compensation at full replacement cost, including cash compensation for the cost of moving, or the cost of moving any movable structures from the land as a result of the land acquisition for the project from the national valuation total and improvements made to the structure.</p> <p>OR</p> <p>Assistance in relocation of secondary structure to replacement land provided, where possible.</p> <p><b>Other Allowances:</b></p> <p>Owners notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction.</p> <p>Right to salvage affected material, with the agreement of the owner.</p> <p>Assistance to be provided transportation for moving to new location.</p> <p>Livelihood restoration programmes will be offered as described in <b>Chapter 11: Livelihood Restoration Plan</b> to this PAP to improve livelihood-supporting secondary structures.</p>

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of structures, commercial buildings and trees or access to them	Formal tenants and formal users that own structures	Provide cash compensation, in accordance with national requirements, for loss of structures and other assets, calculated using market price within the year of the ministerial decree. (Compensation for structures and other assets is included in the compensation for land) <sup>44</sup>	<p>Provide cash compensation at full replacement cost, including cash compensation for the cost of moving, or the cost of moving any movable structures from the land as a result of the land acquisition for the project from the national valuation total and improvements made to the structure.</p> <p>OR</p> <p>Assistance in relocation of secondary structure to replacement land provided, where possible.</p> <p><b>Other Allowances:</b></p> <p>Formal user notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction.</p> <p>Right to salvage affected material, with the agreement of the owner.</p> <p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p>

<sup>44</sup> The valuation of structures and other assets will be covered within the compensation paid for the land, only if there is an official agreement between the landowner and the tenant/user(s). The Survey Directorate will consider this agreement and estimate a compensation for the impacted structure and/or other assets and provide to the landowners. The landowner will then pay the amount calculated for the structures to the tenant/user who owns this structure. NAT will be responsible of monitoring this process to ensure that the formal tenant/user is provided with this compensation by the landowner.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
			<p>Any further costs associated with new tenancy registration, if required.</p> <p>Livelihood restoration programmes will be offered as described in <b>Chapter 11: Livelihood Restoration Plan</b> to this PAP to improve livelihood-supporting secondary structures.</p>
Loss of structures, commercial buildings and trees or access to them	Informal users (squatters) that own structures	No provision is provided under National law.	<p>Provide cash compensation at full replacement cost<sup>45</sup>, including cash compensation for the cost of moving, or the cost of moving any movable structures from the land as a result of the land acquisition for the project and improvements made to the structure.</p> <p>OR</p> <p>Assistance in relocation of secondary structure to replacement land provided, where possible.</p> <p><b>Other Allowances:</b></p> <p>Informal user notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction.</p> <p>Right to salvage affected material, with the agreement of the owner.</p>

<sup>45</sup> The Compensation Committee will be responsible of providing the compensation under the RAP Fund.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
			<p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration, if required.</p> <p>Livelihood restoration programmes will be offered as described in <b>Chapter 11: Livelihood Restoration Plan</b> to this PAP to improve livelihood-supporting secondary structures.</p>
<b>Temporary loss of land/ all other assets (complete or partial)</b>			
Loss of land and all other assets or access to it during construction phase	Landowner / Shareholder	<p>Provide payment for rented land during construction based on the rental market rate<sup>46</sup>. Return subject lands to the landowner in its original (or better) condition.</p> <p>Provide payment for any damages to land.</p>	<p>Compensation at full replacement cost for any damages to land and other assets including trees<sup>47</sup>. Cash compensation for depreciation detracted from the national valuation total and improvements made to the structures.</p> <p>OR</p> <p>Assistance in relocation of secondary structure/trees to replacement land provided, where possible.</p> <p><b>Other Allowances:</b></p>

<sup>46</sup> The payment will be made through a negotiated agreement signed between the PAP and EPC Contractor. The EPC contractor will be responsible of all payments to be made to the landowners and also the reinstatement of land before returning to the landowner. NAT will ensure that this is included in the contracts of the EPC Contractor.

<sup>47</sup> The valuation of trees will be conducted by Alexandria Agriculture Directorate.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
			One month’s advance notification of the owners to move prior to construction.
Loss of land and all other assets or access to it during construction phase	Formal tenants and formal users of land	Provide cash compensation, in accordance with national requirements, for loss of structures and other assets, calculated using market price within the year of the ministerial decree. (Compensation for structures and other assets is included in the compensation for land) <sup>48</sup>	<p>Rental allowance in accordance with the conditions of the rental agreement for 3 months.</p> <p>Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate.</p> <p><b>Other Allowances:</b></p> <p>Tenant notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement).</p> <p>Assistance to be provided for legal costs (see Section 9.2 below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration.</p>

<sup>48</sup> The valuation of structures and other assets will be covered within the compensation paid for the land, only if there is an official agreement between the landowner and the tenant/user(s). The Survey Directorate will consider this agreement and estimate a compensation for the impacted structure and/or other assets and provide to the landowners. The landowner will then pay the amount calculated for the structures to the tenant/user who owns this structure. NAT will be responsible of monitoring this process to ensure that the formal tenant/user is provided with this compensation by the landowner.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
			Livelihood restoration programmes will be offered as described in <b>Chapter 11: Livelihood Restoration Plan</b> to this PAP to improve livelihood-supporting secondary structures.
Loss of land and all other assets or access to it during construction phase	Informal users (squatters) of land	No provision is provided under National law.	<p>Rental allowance in accordance with the conditions of the rental agreement for 3 months.</p> <p>Replacement of cost of improvements made to private non-agricultural land during tenancy as determined by the Survey Directorate.</p> <p><b>Other Allowances:</b></p> <p>Informal user notified within the official valuation letter that they will need to move one month after compensation is paid prior to construction (or special case by case provisions depending on the specifics of the tenancy agreement).</p> <p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p> <p>Any further costs associated with new tenancy registration.</p> <p>Livelihood restoration programmes will be developed as described in <b>Chapter 11: Livelihood Restoration Plan</b> and offered to this category of PAP and they will include access to temporary and permanent employment opportunities.</p>

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
<b>Permanent loss of Livelihoods/ Income or Access to Income (Commercial, Business)</b>			
Loss of business premises (Shop, Kiosk, cafeteria)	Tenants with formal valid and expired legal contracts with ENR	No provision is provided under National law.	<p>Ensure no forced eviction takes place for expired contracts.</p> <p>AND</p> <p>At least 3-months’ notice to be given to all the tenants.</p> <p>AND</p> <p>Provide an alternative location for businesses inside the current stations across the Project, where possible.</p> <p><b>Other allowances:</b></p> <p>Transitional assistance (in-kind) will be provided to re-establish the business at a suitable location.</p> <p>Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan</b>.</p>

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of livelihoods	<p>Stationary business owners - Tenants with formal valid and expired legal contracts with ENR</p> <p>Shops / kiosks / cafeterias in existing stations</p>	No provision is provided under National law.	<p>In case of relocation, cash compensation equal to 1 year's<sup>49</sup> net income (lost profits) plus cost of lost certificates / licenses / patents. The income is based on the official tax declaration.</p> <p>AND</p> <p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p><b>Other allowances:</b></p> <p>At least 3-months' notice to be given to all the tenants.</p> <p>Transitional assistance (in-kind) will be provided to re-establish the business at a suitable location.</p> <p>Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan</b>.</p>

<sup>49</sup> Depending on the duration of a business' transition following relocation, the proposed 1 year's net income cash compensation could be reduced to cover only the period required for the re-establishment of the business and restoration of livelihoods. However, should this be the case, this decision must be based on an assessment for each business owner carried out by a Social Officer prior to the decision, documented and fully agreed with the business owner.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
	Stationary business employees (including employees of businesses outside the Project alignment, if relevant)	No provision is provided under National law.	<p>In case of relocation, loss of income in the period between ending employment prior to expropriation and recommencement of employment (up to 3 months) will be compensated.<sup>50</sup></p> <p>AND</p> <p>In case of business shutdown or in the event that the employee terminates their contract, payment of 3 month’s salary (based on a signed receipt from the business owner) will be provided.</p> <p>Employees will be informed at least 1 month before the exact date of termination of their contract to facilitate finding an alternative job.</p> <p><b>Other Allowances:</b></p> <p>If employment is no longer provided after expropriation, access to NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan</b> and assistance in finding similar, nearby employment, will be provided.</p>

<sup>50</sup> Cash compensation to be paid directly by the Compensation Committee or the governorate authority through the RAP Fund.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of Livelihoods	Mobile and informal vendors <sup>51</sup> - business owners	No provision is provided under National law.	<p>In case of permanent loss, cash compensation equal to 1 year’s net income (lost profits) plus cost of lost certificates / licenses / patents. The Compensation Committee will organise a meeting with the affected informal business owner, who will review informal business activities and determine the net income lost for 1 year.</p> <p>AND</p> <p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p><b>Other Allowances:</b></p> <p>At least 3-months’ notice to be given to all the informal vendors.</p> <p>Transitional assistance (in-kind) will be provided to re-establish the business at a suitable location.</p> <p>Assistance from NAT in effectively and sensitively relocating business activities through the NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan.</b></p>

<sup>51</sup> Those falling under this category of mobile and informal vendors inside the railway corridor and include wooden kiosks and small shops selling clothes / vegetables / food. Based on the site visit and socio-economic survey, the mobile and informal vendor locations are permanently located inside the corridor.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
Loss of Livelihoods	Mobile and informal vendors – Informal Employee	No provision is provided under National law.	<p>If employment is permanently affected, loss of income in the period between ending employment prior to expropriation and recommencement of employment (up to 3 months) will be compensated<sup>52</sup>. NAT will organise a meeting with the affected informal employee with the Compensation Committee, who will review informal employee activities and determine the net income lost for the period of disruption.</p> <p><b>Other Allowances:</b></p> <p>If employment is no longer provided after expropriation, access to NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan</b> and assistance in finding similar, nearby employment, will be provided.</p>

<sup>52</sup> Cash compensation to be paid directly by the Compensation Committee or the governorate authority through the RAP Fund.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
<b>Houses, Shops and Other Establishments Outside (but Adjacent to) the Project Alignment<sup>53</sup></b>			
Limited or restricted access to houses, shops and other establishments during construction	Property owners and tenants with legal title	<p>No compensation for shops on state owned land (owned by ENR or governorates) as they will be transferred to NAT.</p> <p>In the event that the shops are built on private land owned by individuals or any other non-governmental entity, cash compensation will be paid based on the market value of the land and structures.</p>	<p>AND</p> <p>Cash compensation for depreciation detracted from the national valuation total and improvements made to the structure.</p> <p>Arrangements to be made to allow continuous access to and from impacted houses and establishments that will also be aligned with the Project's <b>Traffic Management Plan</b> and <b>Community Health and Safety Plan</b> that will be implemented by the EPC Contractor during construction.</p>
Damage to houses, shops and other establishments during construction	Property/business owners	Cash compensation to be paid by the EPC <b>Contractor for</b> houses and structures damaged by the Project's construction activities.	<p>Cash compensation or in-kind support provided to fully repair the damage. This will be assessed and estimated by specialists, with follow-up remedial action taken by the EPC Contractor.</p> <p>In the event that houses and/or establishments are damage and require the relocation of PAPs, compensation at full replacement cost for any damages to these assets will be provided, or a rental</p>

<sup>53</sup> The design of the Project, as well as the Project's needs for the lands that have been identified so far, do not require the removal of any homes or residential buildings, but the residential buildings have been added to the entitlements matrix due to the possibility that the houses adjacent to the metro track will be affected by excavation activities, especially in the area located in the viaduct section where houses were closed to the Project alignment, which are: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr.

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
			<p>allowance will be provided for the duration of the relocation, if needed.</p> <p>Coordination with relevant authorities and institutes in accessing similar alternative house or establishment for rent with better or improved quality and security of tenure.</p> <p>In case of business shutdown, cash compensation at full replacement cost for the equipment, materials, products etc. owned by the business.</p> <p><b>Other Allowances:</b></p> <p>Assistance to be provided for legal costs (see <b>Section 9.2</b> below) and transportation for moving to new location.</p> <p>Livelihood restoration programmes will be offered as described in <b>Chapter 11: Livelihood Restoration Plan.</b></p>
<b>Vulnerable Groups</b>			
Impact on Vulnerable PAPs	<p>illiterate PAPs</p> <p>Clinically vulnerable to COVID-19</p> <p>PAPs with disabilities and chronic illness</p>	No provision is provided under National law.	<p>Additional assistance will be provided to these PAPs to address specific needs. NAT will support the implementation of all applications in accordance with the national social support programmes offered by the Ministry of Social Solidarity as described in <b>Chapter 11: Livelihood Restoration Plan.</b> Special assistance will include:</p> <ul style="list-style-type: none"> <li>• Enrolment in Government social assistance, if not yet enrolled;</li> </ul>

Type of Losses	Category of PAP	Entitlement	
		Compensation to meet National Requirements	Compensation to meet Lenders Requirements
	Location-dependent elderly persons  Women headed households  Poor PAPs  PAPs taking on the role of primary carer for household member  Individuals who have not had regular wage-based income with a job at which they work more than one year.		<ul style="list-style-type: none"> <li>• Social assistance (discussion groups);</li> <li>• Enrolment in vocational training through the training centres of the Ministry of Industry;</li> <li>• Priority in Project-related employment for members of vulnerable households (if at legal working age); and</li> <li>• Access to NAT Livelihood Restoration Plan as described in <b>Chapter 11: Livelihood Restoration Plan</b> for poor households.</li> </ul>

## 9.2 Assistance with Legal Costs

In addition to the cash and in-kind compensation and other allowances as described in the **Entitlements Matrix (Table 9-1)** above, all PAP categories are entitled to cash or in-kind compensation to cover legal costs for all transactions relating to physical or economic displacement due to the Project, should they occur. These legal costs may include support with registering land property (update of title deeds), correction of inheritance documents, court proceedings, etc.. Except for landowners who are compensated in accordance with national law, the land owner does not bear any legal costs for registration or transactions of ownership.

## 9.3 Transportation Costs

When assets are required to be moved due to expropriation, NAT will cover the costs of transporting these assets using local haulage, shipping and courier providers to replacement land or other locations provided by PAPs. Assets for transportation could include:

- Demolished material (debris);
- Fencing and gates; and
- Sheds and containers.
- kiosks
- Cafeterias equipment (tables, chairs, etc.)
- Wood tables and metal stands installed with these tables
- Shop signs and front

## 9.4 Compensation and Livelihood Support

The decision on which type of compensation provided should be jointly agreed upon between the Project owner and the PAPs. Moreover, livelihood restoration assistance needed to restore the livelihood<sup>54</sup> and standard of living of PAPs under the project to pre-project levels will be provided (i.e. short-term jobs, subsistence support, moving allowance, salary maintenance, food assistance, etc.).

## 9.5 Valuation Process and Methodology

The valuation of losses in assets depends on the type of the lost asset (land/structures). The market value is assessed to estimate the full replacement cost of land/structures, which considers the market value of the asset plus transaction costs such as taxes, stamp duties, legal and notarization fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of property. The evaluation process for the land parcels listed in the land acquisition ministerial decree was carried out by a specialized committee from the ESA and ASD. Compensation for economic activities that are not covered by the national law is currently being evaluated by a specialized committee (the Compensation Committee) with experience in the

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<sup>54</sup> Livelihoods should be improved or at least restored to pre-displacement levels or to levels prevailing prior to the beginning of

Project implementation, whichever is higher.

requirements of Egyptian law and takes into account the evaluation is carried out in accordance with the international requirements of lenders.

### 9.5.1 Forms and Calculation of Compensation

Although the type of compensation may be an individual's choice, compensation in kind (such as land-for-land) is preferred. Compensation refers to both compensation for expropriated assets and livelihood restoration of income.

Compensation for property and assets are estimated according to the prevailing market prices at the time of the land acquisition decision, and an additional (20%) twenty percent of the value of the estimate is included in the compensation based on Law No. 24/ 2018.

**Table 9-2: Forms of compensation and calculation methods**

Types of Compensation	Calculation Method
Cash Payments	Compensation will be calculated and paid in Egyptian Pounds. Rates will be adjusted for inflation.
Similar alternatives structures	Compensation may include alternative structures equivalent to those which were affected, such as shops and mosques.
Other Assistance	Assistance may include moving allowance, transportation and labour, title fees, or other related costs.

### 9.5.2 Valuation of Land parcels

Both land and assets are valued and compensated for according to the following standards/ requirements and as appropriate for the Project:

- Compensation values are based on full replacement cost, as of the date that the full replacement is to be provided or at the date of Project identification, whichever is higher.
- Full market prices for land are determined based on their value on the local market, plus costs such as taxes, stamp duties, legal and notarisations fees, registration fees, travel costs and any other such costs such as may be incurred as a result of the transaction or transfer of the land.
- The Project will assure security of tenure.

The above valuation method will be applied to the following land parcels for the Project:

1. **The depot:** El Nahas land, estimated at 204,436 m<sup>2</sup>.
2. **The new station (Bab Sharq):** The construction of the Bab Sharq station will require additional land from two adjacent plots of land, namely:
  - The first is administrative building owned by the Health Directorate in Alexandria (approximately 869 m<sup>2</sup>). Compensation for this building requires coordination between NAT and the Health Directorate in Alexandria (coordination meetings are currently being held) in order to account for the employees and services provided to citizens via the building. Additionally, there may be a possibility of providing alternative offices through the Health

Directorate in which NAT is responsible for payments related to the cost of equipping the offices.

- The second is a **privately owned land with no facilities**. It is currently being utilized as a parking lot and car wash business (approximately **632 m<sup>2</sup>**).

**3. The new station (Sporting):** The construction of the Sporting station will require additional land from two adjacent plots of land,

- The first land is currently being used as **warehouse owned by ENR (approximately 852 m<sup>2</sup>)**. It is included in the ministerial decision of land acquisitions that was issued for the Abou Qir Project, and its ownership will be transferred to the NAT directly as it is owned by the Ministry of Transport, and thus considered an internal transfer of ownership.
- The second is a **privately owned land with no facilities**. It is currently being utilized as a car garage (approximately **887 m<sup>2</sup>**).

**ESA and ASD Valuation Committee:** The ESA and ASD conducts a land survey to identify all assets, structures and facilities occupying the land. The compensation estimated by ESA includes the total value of the structures/assets on the land. Through the land survey, the ASD describes everything that is included in the private land (structures, facilities, infrastructure, etc.). Compensation includes the value of the land (the price of the land) and other assets. This applies only to private lands listed in the ministerial decree for expropriation.

The ASD has issued the final cash compensation value for the land owners, and lists are currently being prepared that include the names of the owners, the area and compensation for each of the landowners.

**Alternative land as compensation:** Land of equal size and location, with similar or improved public infrastructure facilities and services should be provided, if available. If this is not possible, cash compensation at replacement cost will be provided.

### 9.5.3 Supplementary Valuation for Unviable Land

If the Project divides a land parcel to the extent that the remaining section(s) are not suitable for further use or access is restricted, the landowner has the right to request from NAT that the remaining section(s) also be acquired. In order to prevent such situations, NAT will proactively consider the remaining land prior to acquisition, and if this land is considered unviable, will include this land in the early compensation discussions. The compensation entitlements and valuations for unviable land will be the same as for non-agricultural land parcels, as detailed in **Table 9-1: Entitlement Matrix for Affected Persons**.

### 9.5.4 Valuation of Compensation for Use of Temporary Land

The Contractor will obtain access to areas that are required on a temporary basis, during the construction phase, through a willing buyer-seller or rental agreement. NAT will ensure that the Contractor provides a fair and transparent payment to the landowner as defined by the Entitlement Matrix (**Table 9-1**) based on the Lender's requirements and they will monitor payments. The landowner will be compensated for their restricted access and usage rights as well as the loss of productivity and income from the land, during the period when the Contractor is using it.

### 9.5.5 Valuation of Other (Non-Land) Assets

Cash compensation for buildings and structures will be paid for shops, kiosks and other impacted structures, however where possible alternative locations / shops will be proposed. The right to salvage material will also be granted, in which case no cash compensation will need to be disbursed other than for transportation and relocation as needed.

#### 9.5.5.1 *Kiosks, Cafeterias And Shop Tenants inside the Current Railway Stations/ outside Project Alignment*

There are (8) shops/ Kiosks, cafeterias identified within the stations that will be removed. The Compensation Committee is currently consulting with the shop tenants regarding the available alternative compensation options. The following alternatives will be offered:

- Shops belonging to MoT in other areas near to the location of the current shop.
- Cash compensation for loss of livelihood as described in the Entitlements Matrix (**Table 9-1**).

The Project's land requirements do not necessitate the removal of any shop outside the corridor. However, these shops have been considered due to the possibility of damage occurring due to Project construction activities, especially in the area located at the following stations: Victoria, Mohamed Naguib, Sidi Bishr, Miami, Asafra, El Mandara and to El Montazah where the Project alignment will be elevated (the viaduct area).

#### 9.5.5.2 *Structures, Commercial Buildings and Trees*

The Project's land requirements do not necessitate the removal of any houses or residential buildings. However, the residential buildings have been added to the compensation matrix due to the possibility of houses adjacent to the Project alignment potentially being damaged by construction activities, especially in the area located at the following stations: Al Zahiria, El Souqh, Ghebrial and Sidi Bishr where the Project alignment will be elevated (the viaduct area).

The value of compensation for potentially affected houses is estimated by the ASD, the Directorate of Housing in Alexandria and the Directorate of Real Estate Taxes, in addition to, the Compensation Committee. The houses are evaluated according to the following criteria:

- Location in the area/ district;
- Number of floors and condition of the building;
- Type of building materials, paints, facade/ wall finishes and utilities available;
- The area of the land on which the house is built;
- The cost needed to rebuild the dwelling (labour, transportation of building materials, permit, etc.); and
- Prevailing market price.

The ASD Valuation Committee will conduct a land survey and identify all assets, structures and facilities. NAT PMU and the Compensation Committee will request a specialized technical committee to be formed on behalf of NAT to examine the condition of the building and assess any damage.

The trees valuation will be carried out by the Alexandria Agriculture Directorate, according to the price list of trees and crops that are updated annually and approved by the Agriculture Directorate and the Governor. Trees evaluation includes; tree type, name, age, fruitful or non-fruitful.

### 9.5.5.3 Compensation for Mosques

A total of 13 mosques will be removed, the following procedures are followed to estimate mosque compensation:

- coordination between NAT and the Ministry of Endowments (the responsible authority for all mosques in Egypt) to obtain consent for the planned expropriation (already completed as mentioned above);
- Officials of the Endowments Ministry will conduct consultation activities with the local community around the mosques that will be removed, through the imams of the mosques. Consultations will focus on the proposed alternatives, including the construction of a new mosque or expansion of an existing mosque, in order to reduce any inconsistency and potential conflicts that could arise from removing mosques;
- Establishing alternative mosques or contributing to the establishment and expansion of existing mosques, which will be completed prior to construction.
- Following the completion of the Abou Qir Metro Project, vacant land parcels in the areas where a viaduct is established may be used for the construction of the alternative mosques.

### 9.5.6 Valuation of Income and Livelihood Losses

The goal of the entitlements matrix is to compensate, restore, and whenever possible, improve the livelihoods of PAPs in re-establishing and strengthening current livelihood practices in the short and medium term. In addition, the **Livelihood Restoration Plan (Chapter 11)** will provide measures to develop transferable skills and create self-reliance for PAPs in the long term.

This plan considers the following elements:

- Identification of all PAPs who will be economically affected by the Project;
- Detailed estimations for their monthly income to be defined in cooperation with the Governorate and the District Authority in order to calculate the needed compensation. The proposed value will be consulted and agreed with the PAPs.

According to the socioeconomic survey (undertaken in April/May 2022) and the Compensation Committee, the number of stationary informal vendors inside the Project right of way is (21), which include wooden kiosks and small shops selling clothes / vegetables / food. Based on the socioeconomic survey, the stationary informal vendors are permanently located inside the Project corridor. Livelihood restoration assistance included in the **Livelihood Restoration Plan (Chapter 11)** will include some of the following:

- Provision of skills training;
- Access to jobs;
- Provision of personal documents; and
- Provision of micro loans.

The livelihood support includes business owners and employees located inside the stations or those outside the Project right of way.

The Compensation Committee in cooperation with some government agencies (such as the Ministry of Social Solidarity) work to support vulnerable groups affected by the Project by paying cash compensation to groups not covered under Egyptian law. This approach is applied on a case by case basis by the Ministry of Social Solidarity for each PAP separately.

#### 9.5.7 Valuation of Other Support and Assistance

The Project will develop and implement a livelihood assistance program (See **Chapter 11: Livelihood Plan**) aimed at assisting those who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status who are impact by the Project. PAPs in the form of stationary informal vendors and mobile informal vendors<sup>55</sup> may be less able to participate, more adversely affected and have limited ability to take advantage of the benefits of the livelihood restoration support.

#### 9.5.8 Compensation for Vulnerable Groups

National legislation does not provide special provisions or assistance to vulnerable groups who may be affected by expropriation. Additional assistance will be provided to households with vulnerable people to address specific needs, to meet Lenders requirements, and it will be provided under the separate RAP Fund. Vulnerable groups include: the poor, female-headed and cumulatively affected households (including significantly affected PAPs as described in Section 5-7 of **Chapter 5: Affected People and Assets**, and those households taking care of at least one person that is elderly, sick or disabled, families headed by women, the main wage earner in the family is physically disabled, poor families (total family income is less than the minimum wage) and illiterate/ uneducated PAPs. Special assistance will be provided to these vulnerable groups, as detailed in **Table 9-1: Entitlement Matrix for Affected Persons** and **Chapter 11: Livelihood Restoration Plan**.

### 9.6 Compensation Application and Negotiation Process

After ASD and NAT Compensation Commission completes all administrative procedures (such as determining the landowners, users, and heirs, updating land records, issuing list of location, owner name, surface area, compensation evaluation, and sending official notifications to land owners). This will include the payment to be made under the national legislation. The valuation survey result will be disclosed at the governorate office of ESA (ASD) and District offices for one month. Land owners will be informed of the valuation result via official letter. NAT will publish the valuation results in the Egyptian Gazette, official journal and two daily newspapers for one week.

Landowners covered by national law and PAPs not covered by national law (formal and informal) will be notified and invited for negotiation for declaration of compensation amount calculated for the affected land and/or other affected non-residential structures and/or trees. This will include the payment to be made under the national legislation, and the payment made through the separate RAP Fund.

The consultations on compensation values and methods will then be held in the area(s) where the land, structures, commercial buildings and trees are located. These consultations will be carried out for all PAPs, including those covered under national legislation and also those not covered under

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<sup>55</sup> Individuals and/or groups who may lose their source of livelihoods as a result of land acquisition.

national legislation, who will instead be covered by the measures in this RAP (such as formal tenants and informal users).

When a compensation agreement is reached (with no bargaining allowed according to national legislation), it is then signed between NAT and the affected PAP. This will clearly state the compensation amounts (both in-kind and cash compensation) to come from either/both the compensation through national legislation and/or the separate RAP Fund. The relevant amount is deposited by NAT to the bank account which is accessible to the PAP with proper documentation within 3 months from the date of publishing the list of PAPs names, as required by national legislation. In case of failure to reach an agreement, where the PAP does not agree with the value determined by the independent asset valuation surveyors, or the PAP does not attend the consultations, the PAP and/or NAT will submit the case as a grievance. The valuation will be reviewed through the Grievance Mechanism defined in the **SEP**. Landowners covered by national law are entitled to raise a grievance with the ASD office in particular the focal point responsible for landowners' grievances.

However, if no agreement is made after review through the Grievance Mechanism, court proceedings will commence, the landowner and/or users would resort to take the issue to the court of first instance in Alexandria governorate (where acquisition will be conducted). The court will re-evaluate the land parcel and assets (as explained in **Chapter 3: Legislative Framework**), and the valuation will be determined through the court process.

The compensation determined by the court (in line with national legislation) will be deposited, by NAT in accordance with the instruction given by the court to the bank account accessible to the PAP with proper documentation, as required by national legislation. The relevant amount will be kept in the account opened by NAT for the PAPs that cannot be contacted or identified depending on the type of court. The additional entitlements provided through the RAP Fund will still apply and be provided to the PAP.

Partial agreements can also be reached with owners to whom compensation is offered for land parcels and assets. In this case, the PAP can choose to accept the compensation payment for land and reject compensation for assets (or vice versa). This situation requires the matter to be referred to court in relation to the entire compensation, both land parcels and assets (as explained in **Chapter 3: Legislative Framework**).

## 9.7 RAP Fund

The RAP Fund is a special standalone budget that is established to cover land-based impacts of a Project that are not covered by national law but should be covered to comply with Lender's requirements.

The RAP Fund considers the following principles:

- Fair and transparent evaluation of impacted assets and livelihoods;
- Compensation of loss at replacement cost;
- Method of compensation of economic loss not regulated under applicable Egyptian legislation; and
- Disadvantages that would be created by Project impacts.

RAP Fund is a supplementary fund formed by NAT based on international standards and good practices in order to compensate economic losses sustained and to be sustained by PAPs and impacted businesses but who are not recognised under national law.

## 10. INFORMATION DISCLOSURE AND CONSULTATIONS

This chapter describes the consultation approach adopted during the RAP implementation and the grievance mechanism to be used to resolve any disputes that may arise.

Stakeholder consultation has informed the design and development of the Project, in addition to, the Project-specific land acquisition and livelihood restoration measures presented in this RAP. The aim of these consultations is to provide accurate and timely information on the Project to the public, affected communities and PAPs, including potential Project impacts and the land acquisition process. This Project information is presented in a format that is easily understood by all stakeholders to ensure constructive and meaningful consultation and informed participation in compensation negotiations. Effective land acquisition planning requires regular consultation with PAPs and affected communities, in addition to, local and state authorities, civil society organizations and other groups that have a significant role in shaping or affecting the Project, either positively or negatively.

Lender's requirements describe requirements relating to consultation requirements for projects involving physical and economic displacement.

### 10.1 Engagement Activities during the ESIA

During the Project preparation and as indicated in the Pre-ESIA consultation chapter, the first scoping meeting should start as early as possible in the ESIA process to ensure the full engagement of stakeholders. The consultation activities will be designed to comply and meet the IFIs Requirements and will include affected communities, NAT, MoT, EEAA, other government Ministries, agencies and NGOs. Consultation and participatory activities were considered during this early phase of the ESIA to ensure that the assignment is clearly shared and verified with various groups of stakeholders. During and following the scoping meetings, all views and concerns raised were documented and issues raised during the scoping meetings are considered in the ESIA.

### 10.2 Engagement Activities for the RAP

All consultation activities that are carried out as part of the RAP will be in line with the Project **SEP** that was developed as part of the ESIA.

A socio economic survey was carried out by the RAP Team with the owners/users of Project affected lands between April-May 2022. The details and results of this survey are presented in **Chapter 5: Affected people and Assets**. During the survey, interviewees were informed of the Project and its pertinent land acquisition activities.

The consultation included consultation meetings with **XXXX**, 2 FDGs with women and 2 FDG with shops externally adjacent to the Project corridor.

#### 10.2.1 Consultation Meetings

[Currently awaited – to be added.]

### 10.2.2 Women FGDs

Details of the 2 FGDs for women only led by Dr Anan Mohamed Ali and Mona Abu Bakr from the RAP Team conducted by the RAP team are provided in **Table 10-1**.

**Table 10-1 Women Only FGDs**

FDG	Venue	Date / Time	Attendees
1	Celebration halls (Princess Hall) in Bakoos area near Ghebrial station	12 May 2022 12pm-2pm	(14) women from Ghebrial and Bakoos areas
2	Al Zahiria area - Ezbet Al-Safih in the street adjacent to the Project alignment corridor	12 May 2022 7pm- 8:30	(19) women from Al Zahiria area

The RAP team presented an introduction about the Project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness with the Project, but made it clear that they had many concerns and questions that they needed to answer clearly, because this would determine their perceptions on the Project.

The attendees presented their concerns and questions and the RAP team responded according to the available information. **Table 10-2** shows the topics raised during the FGDs and the RAP team's response to them.

**Table 10-2 Summary of Women Only FGD Discussions**

	Topic	Response
1	<p><b>The project's land needed (expropriation of houses)</b></p> <p>We do not have clear information about the Project.</p> <p>Will the houses adjacent to the Project path be removed?</p> <p>Does the plan to establish the Project will require the removal of houses?</p> <p>Will the land of the houses be expropriated/ what is our situation in the event that houses demolitions?</p> <p>What are the procedures that will be taken if any damage occurs to a house as a result of construction work?</p> <p><b><i>It should be considered that we do not have any alternatives to move, as these houses in which we live are the only housing for us, and their demolition and removal for the benefit of the project means our homelessness.</i></b></p>	<p>The final design of the project does not include the removal of any houses. The project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any houses.</p> <p>In the event that any house is damaged as a result of construction activities (excavation), the National Authority for Tunnels is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p> <p>Regarding the actions to be taken in the event of any damage to any house as a result of construction work; The house will be inspected and examined by a technical committee to assess the damage, and the measures that must be taken for the safety of the residents, bearing in mind that these measures are taken very quickly.</p> <p>The construction contractor is responsible for determining the risks that may arise from the</p>

	Topic	Response
	<p><b>We would like to know the following:</b></p> <ul style="list-style-type: none"> <li>- Notify us of construction dates well in advance of its start, especially in areas that will have excavations,</li> <li>- In the event that the construction of the project affects the existing facilities (water connections, electricity, sewage, telephones), we must be notified before that,</li> <li>- Will there be a direct communication channel for us on the construction site?</li> <li>- How to communicate with those responsible for the project in case of damage from any construction activities</li> </ul>	<p>construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p> <p><b>What information do you want to know? What are the best channels to share information with you?</b></p> <p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p><b>Grievance Channels</b></p> <p>The following are the main channels through which grievances will be received:</p> <ul style="list-style-type: none"> <li>• Engineering representative on-site: <u>It has not been identified yet</u></li> <li>• NAT Website: <u>Contact Us</u></li> <li>• Direct mail to the Chairman of NAT: <a href="mailto:chairman@nat.org.eg">chairman@nat.org.eg</a></li> <li>• Planning Department: <a href="mailto:pld@nat.org.eg">pld@nat.org.eg</a></li> <li>• Telephone calls (Landline): +20225743070</li> <li>• Hotline: (16528) There is no hotline except for general Government Complaints</li> <li>• Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466</li> <li>• The Government Complaints/ Portal: <a href="http://www.shakwa.eg">www.shakwa.eg</a></li> </ul> <p>People can also submit questions / comments related to the project through the project’s email address created specifically for the project, <a href="mailto:alexandriametro.nat@yahoo.com">alexandriametro.nat@yahoo.com</a>.</p> <p>All required information raised in today's discussion will be taken into account and shared with the project officials from NAT.</p>
<p>2</p>	<p><b>Actions to be taken by NAT for women (metro users) during operation</b></p> <p><b>Will a metro car be reserved for women or not?</b></p>	<p>NAT is currently adopting several measures to ensure the safety of all passengers for the Cairo Metro Line. Where all stations have <b>surveillance cameras</b>. The Cairo Metro Line 3 also includes surveillance cameras in all its metro cars, and the Alexandria metro line is expected to do the same.</p> <p>There are numerous grievance channels in place for passengers as well, including a <b>hotline, WhatsApp support and Facebook page</b>. Additionally, there are <b>support booths for general grievances located across the line in the stations</b>.</p> <p>The same measures will be taken for the Alexandria metro, while studying the most effective measures to protect the safety of women passengers on the metro, which <b>may include allocating a car for women</b>.</p>

	Topic	Response
3	<p><b>Railway alternatives during construction</b></p> <p>what is the alternative transportation for the train during construction?</p>	<p>NAT in cooperation with the Alexandria Public Transportation Authority, has studied the best alternatives that are provided before the train stops working. Indeed, alternative transportation has been provided, which is currently being tested, and work has begun on the streets of Alexandria in the areas surrounding the Abou Qir train track.</p>
4	<p>Is the project serious or not, because it has been postponed more than once?</p> <p>what is the start date for project implementation?</p>	<p>Yes, the project is serious, and almost all the studies required to be prepared before construction have been completed.</p> <p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which requires that the study be prepared and compensation implemented before any project construction activities begin.</p>
5	<p>How high is the metro above the surface (viaduct area)?</p>	<p>The height of the metro above the surface in the viaduct area is 6 m, according to the data received from the engineering consultant for the Project (SYSTRA).</p>
6	<p>At the present, a brick wall separates our houses from the railway corridor. this brick wall is used to collect waste which collected from houses and has become a source of unpleasant odour and insects, in addition to the fact that the railway corridor is used during the night to sell and use drugs by some outlaws.</p> <p>What are the measures that will be taken to restructuring the area under the viaduct?</p> <p>Will the brick wall separating the houses and the railway corridor be removed after the metro construction?</p> <p>We hope that the brick wall will be removed and the area under the viaduct restructured so that it becomes an access for the community. we are currently suffering in case of needing an ambulance to enter the area, as well as from the endless accumulation of waste and the prohibited activities that take place inside the railway corridor at night.</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the Project and the safety and security of the viaduct.</p> <p>All your comments and recommendations that were raised in today's discussion will be shared with NAT officials, to be taken into account whenever possible, in line with the requirements of the construction and operation of the Project.</p>

	Topic	Response
	<p>As residents of the area, the construction of the metro will be of great benefit to us, not only as a safe and clean means of transportation, but also because it will save us from many of the problems we suffer from at the present.</p> <p>Please take the restructuring of the area under the viaduct into consideration as a request from residents of Ghebrial and Al Zahiria areas.</p>	

### 10.2.3 FGDs with Shops Externally Adjacent to the Project Corridor

Details of the 2 FGDs for shops externally adjacent to the Project Corridor led by Dr Anan Mohamed Ali and Mona Abu Bakr from the RAP Team conducted by the RAP team are provided in **Table 10-3**.

**Table 10-3 FGDs shops adjacent to Project**

FDG	Venue	Date / Time	Attendees
1	A shop in Victoria area.	20 April 2022, 7:30pm- 9pm	(8) shop tenants from Victoria area.
2	Office of one of the shop tenants in Asafra area near to the Project alignment corridor.	14 May 2022, 12pm- 1:30pm	(14) shop tenants from Victoria and Asafra areas.

The RAP team presented an introduction about the Project and the purpose of the FGD, then opened the discussion.

The attendees expressed their happiness that they are being consulted, because they have a lot of concerns and questions that they need to answer. They are worried because they are not aware of the decisions that will be taken in the next stage towards their shops.

The attendees presented their concerns and questions and the RAP team responded according to the available information. **Table 10-4** shows the topics raised during the FGDs and the RAP team's response to them.

**Table 10-4 Summary of Adjacent Shop FGD Discussions**

	Topic	Response
1	<p><b>The project's land needed (expropriation of shops area)</b></p> <p>Will the shops be removed for the construction of the metro project?</p> <p>Why was a socio-economic survey of some shop tenants? Are these sim shops removed and compensated?</p> <p><i><b>We have been renting these stores for a long time, some of them have been renting for</b></i></p>	<p>The final design of the project does not include the removal of any shops adjacent to the Project corridor. The project will be constructed on ENR property within the train corridor, and construction activities will be limited to the area allocated for the railway corridor. Therefore, the project construction plan does not require the removal of any shops adjacent to the Project corridor.</p>

	Topic	Response
	<p><b><i>about 40 years. The vast majority of us these shops represent our only source of livelihood.</i></b></p>	<p>The shops that will be removed are the shops inside the existing stations, and they have already been notified of this.</p> <p>The socio-economic survey was conducted on a random sample of the shops adjacent to the alignment corridor, due to its close proximity to the project site and the possibility of being affected during construction, and therefore it was taken into account during the preparation of the RAP study. But this does not mean that these shops will be removed.</p>
	<p>What will happen if the construction activities affect one of the shops, what are the procedures that will be taken in this case?</p>	<p>In the event that any shop will be affected as a result of construction activities, NAT is the project owner and is responsible for compensating the damage that may result from construction activities. This will be done through the construction contractor, who is responsible for the safety of the facilities surrounding the construction areas.</p> <p>Regarding the actions to be taken in the event of any damage to any shop; the shop will be inspected and examined by a technical committee to assess the damage, and appropriate compensation for all damages will be assessed.</p> <p>The construction contractor is responsible for determining the risks that may arise from the construction on the surrounding facilities, before the start of construction, to avoid damage as much as possible.</p>
	<p>Is it likely that the construction of the project will require the area on which the shops are currently located? What actions will be taken in this case?</p> <p><b><i>Please bear in mind that many of these shops are not owned by ENR, but are owned by the Community Development Association in Alexandria, and we rent the shops from them with a contract that is renewed annually and pay the rent for the whole year in advance.</i></b></p>	<p>In the event that the construction of the project requires the area in which some shops are currently located, the shops will be compensated according to the full replacement cost based on the national requirements of the Egyptian law as well as the international standards and requirements of lenders, NAT as the owner of the project is obligated to do so.</p> <p>Replacement cost is the market value as determined by an expert property, plus associated transaction costs; example labor cost for building structures or other fixed assets, plus transaction costs.</p> <p>The RAP study for the project is now being prepared, which is prepared in accordance with the international standards/ requirements for lenders, and which requires that the study be prepared and compensation implemented before any project construction activities begin.</p> <p>The RAP includes all affected groups by the project as well as those who may be affected at a later stage.</p>

	Topic	Response
2	<p>We understood from you today, by presenting a description of the project, that the area in which the shops are located, the metro track will be elevated at a height of no less than 6 m; Does this mean the possibility of restructuring the area under the metro alignment (viaduct) and removing shops?</p>	<p>NAT has not prepared a study to restructuring the area under the viaduct, NAT will rehabilitate the railway corridor under the viaduct in line with the construction of the project and the safety and security of the viaduct.</p> <p>All your comments and concerns that were raised in today's discussion will be shared with NAT officials, to be considered, in line with the requirements of the construction and operation of the project.</p>
3	<p><b>Consultation activities with shop tenants</b></p> <p>We were not consulted except by the consultant who invited us to attend the public consultation session about a year ago, but the National Authority for Tunnels did not consult with us.</p> <p>Does this mean that the shops will not be removed?</p> <p>Why do we not have enough information about the project, and its land needs? Will we be notified in case the shops are demolished? We need to know more information on a regular basis, who will contact us for that?</p>	<p>A stakeholder engagement plan has been prepared for the Alexandria metro project, which includes a program for consultation with all parties involved in the project, including shop tenants. The consultation process is an ongoing process during the various stages of the project life.</p> <p><b>Please specify the information you would like to receive, and the best communication channels for obtaining information.</b></p>
	<p><b>We would like to know the following:</b></p> <ul style="list-style-type: none"> <li>- Notify us of construction dates well in advance of its start,</li> <li>- How to communicate with those responsible for the project in case of damage from any construction activities</li> <li>- In the event that the project needs to remove some shops, the tenants of the shops must be notified sufficiently in advance, and determine the compensation that is commensurate with the value of these shops, and give logical reasons for removing these shops from others.</li> </ul> <p>The best channel of communication is direct communication with shop tenants, as well as through the Community Development Association and ENR, which are the parties that have been contracted with.</p>	<p>The following are the main channels through which grievances will be received:</p> <ul style="list-style-type: none"> <li>• Engineering representative on-site: <u>It has not been identified yet</u></li> <li>• NAT Website: <u>Contact Us</u></li> <li>• Direct mail to the Chairman of NAT: <a href="mailto:chairman@nat.org.eg">chairman@nat.org.eg</a></li> <li>• Planning Department: <a href="mailto:pld@nat.org.eg">pld@nat.org.eg</a></li> <li>• Telephone calls (Landline): +20225743070</li> <li>• Hotline: (16528) There is no hotline except for general Government Complaints</li> <li>• Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466</li> </ul> <p>The Government Complaints/ Portal: <a href="http://www.shakwa.eg">www.shakwa.eg</a></p> <p>People can also submit questions / comments related to the project through the project's email address created specifically for the project, <a href="mailto:alexandriametro.nat@yahoo.com">alexandriametro.nat@yahoo.com</a>.</p> <p>A direct communication channel will be provided at the construction site and a grievance mechanism for the community will be available.</p> <p>All required information raised in today's discussion will be considered and shared with the project officials from NAT.</p>

	Topic	Response
4	<p>what is the start date of the project implementation?</p> <p>Has a date been set for the train stopping and the start of construction activities inside the corridor?</p> <p><b><i>Please keep in mind that the back walls of the shops are the railway fence at the moment, the shops must be protected from the impact of the construction activities.</i></b></p>	<p>The start date of the project implementation has not been determined, but it will be announced on the NAT's website as well as on the Alexandria Governorate website, well before the start of construction.</p> <p>NAT confirmed, during the preparation of the ESIA, that the construction contractor is responsible for protecting the shops adjacent to the alignment corridor from the impact of construction activities, and that the project design does not require removing the shops adjacent to the alignment corridor.</p>

### 10.3 Consultation Strategy for Land Acquisition

#### 10.3.1 Means and Tools for Communication

#### 10.3.2 Vulnerable Groups

#### 10.3.3 Gender Focused Approach

#### 10.3.4 Guide for Land Acquisition and Compensation (GLAC)

[To be populated.]

### 10.4 Planned Engagement Activities

#### 10.4.1 Engagement Timeline for Land Acquisition

#### 10.4.2 Consultation and Disclosure of RAP

[To be populated.]

### 10.5 Grievance Mechanism

NAT has an existing Grievances Mechanism. The process of receiving and managing grievances is described in the Project **SEP**. The Current grievance mechanism is a participatory tool for the internal and external stakeholders, while it is a mandatory process for NAT. The procedure described in this document is extended to communities, all workers onsite, including permanent workers, casual workers, service providers, consultants, suppliers, subcontractors and external stakeholders, accessible to all workers, and at no cost and without retribution.

Although there are grievance mechanism for workers at the construction site (related to the contractor and is supervised and monitored by NAT), NAT's complaints channels are available to all parties concerned with the Project.

The entity responsible for handling grievances will mainly be the Grievance Committee within the implementing agency (NAT/ PMU).

- The Grievances Committee receive the complaint;
- The Grievances Committee directs the complaint to the concerned department or to the engineering department for investigation;
- The complaint and the investigation report are routed back to the grievances committee, where a report is prepared and raised to the decision-making authority;

- Document all received grievances;
- Document, report and disseminate the outcome of received grievances;
- Ensure that each legitimate complaint and grievance is satisfactorily resolved by the responsible entity; and
- Monitoring grievance redress activities.

The PMU in cooperation with the Contractor will address all grievances raised by community members, particularly the ones related to resettlement activities.

Assigning a responsible person or a team to handle the resolution of grievances is part of GRM related to IFIs Requirements. Creating a timeframe where the aggrieved person has been provided with acknowledgment of receipt of their grievance with a pledge of a resolution, in addition to maintaining confidentiality, will result in amicable implementation of the Project.

The proposed mechanism is built on two tiers of grievances:

**First tier of Grievances:** Project level (on-site)

The Project Manager on site (contractor) is responsible to ensure that the GRM system is widely promoted and clearly explained on a local level. Moreover, they will follow up on the complaint until a resolution is reached. The turnaround time for an effective resolution should be 10 days from receiving the grievance and the CLO should inform the complainant of its outcome.

The Project developed a mechanism for handling project-level complaints and grievances with the aim of ensuring that Project related complaints are addressed in a timely and transparent manner. The Project GM is designed to accept grievances from all Project stakeholders.

Grievances are documented through the grievance log, which is designed for project to ensure documentation and follow-up. During construction the contractor is responsible for receiving, following up and resolving complaints, and NAT is responsible for monitoring.

**Second tier of Grievances:** On the level of NAT headquarter. If the aggrieved person is not satisfied with the decision of the first tier, he can raise the complaint to the NAT headquarter.

The following are the main channels through which grievances will be received:

- Engineering representative on-site: It has not been identified yet;
- NAT Website: Contact Us;
- Direct mail to the Chairman of NAT: [chairman@nat.org.eg](mailto:chairman@nat.org.eg)
- Planning Department: [pld@nat.org.eg](mailto:pld@nat.org.eg)
- Telephone calls (Landline): +20225743070
- Hotline: (16528) There is no hotline except for general Government Complaints
- Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466
- The Government Complaints/ Portal: [www.shakwa.eg](http://www.shakwa.eg)

All grievances should be addressed to the focal point whose contact details are as follows:

- Ms. / Eng.: Magdy Madany
- Address: Cairo, Ramses Square – NAT building - ZIP: 11794 p. B 466
- Telephone: +20225742968
- Email: [magdymadany@hotmail.com](mailto:magdymadany@hotmail.com)

## 10.6 Guide to Land Acquisition and Compensation

A land acquisition and compensation guide (GLAC) has been prepared together with the RAP to be distributed to all PAPs invited for negotiations. The aim of the guide is to provide basic information regarding the entitlements of the PAPs who are impacted by the Project.

The GLAC includes information on the following:

- Project description;
- Procedure to be followed for land acquisition, including legal requirements;
- Eligibility conditions for compensation;
- Valuation for compensating assets lost to the Project; and
- Answers to major concerns or frequently asked questions by PAPs who are both owners and users.

## 11. LIVELIHOOD RESTORATION PLAN

### 11.1 Livelihood Restoration Objectives

As presented in **Chapter 5: Affected People and Assets**, this Project will require the acquisition of land parcels from private owners and the physical and economic displacement of PAPs. Economic displacement will be caused by the loss of business premises as a result of the Project activities and will impact formal and informal business owners (including stationary, mobile and informal vendors) as well as employees of these businesses. Impacts on business is also anticipated to result in the permanent and temporary loss of livelihoods<sup>56</sup>, in addition to, temporary impacts such as nuisance during the construction phase.

This LRP provides a basis for NAT to develop and implement a full livelihood restoration plan to support the livelihoods of PAPs that will be economically displaced due to Project activities. This includes support to maintain and improve current economic activities, as well as provide alternative livelihood opportunities, with the aim of ensuring that PAPs are not economically disadvantaged in the long-term as a result of the Project. Further, in situations where vulnerable PAPs will be economically displaced, this LRP provides a basis for NAT to develop opportunities for these PAPs to improve their livelihoods.

This LRP is based on the information gathered during the Socio-economic surveys. It sets out the key livelihood restoration measures to be applied by NAT, addressing the gaps between national legislation and Lender's requirements in relation to livelihood restoration of PAPs. NAT will review and apply the measures included in this Chapter to develop detailed Livelihood Restoration Assistance Packages (LRAPs) for PAP groups.

The LRAPs will be developed by NAT prior to the implementation of this RAP (as described in **Chapter 13: Implementation Schedule and Budget**). The LRP and LRAPs will be reviewed and updated by NAT PMU throughout its implementation.

### 11.2 Livelihood Restoration Eligible Groups

**Chapter 9: Entitlements and Compensation** provides a full breakdown of the entitlements for compensation and resettlement assistance for the PAP groups (Table 9-1: Entitlement Matrix for Affected Persons). Eligibility for LRAPs is included within the Entitlements Matrix (presented in **Chapter 9: Entitlements and Compensation**).

It is expected that business owners and employees will be the most significantly affected by economic displacement, due to the loss of shops / kiosks / cafeterias currently used in existing the stations. These PAPs will therefore not only be provided cash compensation for their loss of livelihoods but will also be entitled to additional livelihood support measures to ensure that they do not experience economic hardship due to the Project.

PAPs will be informed about their livelihood restoration entitlements by NAT, the Project CLO and the Land Acquisition and Livelihood Restoration Specialist, during consultation meetings, negotiations with

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<sup>56</sup> "Livelihood" refers to the full range of means that individuals, families, and communities use to make a living, such as wage-based income, petty trade and bartering.

landowners / users and ongoing engagement with PAPs. NAT will explain to PAPs what is included in the LRAPs and provide eligible PAPs with the opportunity to apply for these packages. When applying for LRAPs, PAPs will need to provide the information in **Table 8-1**. NAT will provide support and assistance to vulnerable PAPs with this process (such as completing paperwork, legalising leases, etc.), if needed, and details of this support will be communicated through consultation meetings, negotiation meetings and ongoing stakeholder engagement activities. This support can be provided through one to one sessions with vulnerable PAPs after consultation meetings.

**Table 11-1: Information Required per PAP Group for LRAP Eligibility Proof**

Impact	PAP Group	Information Required
<b>Permanent loss of commercial non-arable land</b>	Landowners / shareholders including vulnerable  (Land parcels relating to depot land, Bab Sharq Station and Sporting Station)	<ul style="list-style-type: none"> <li>• Proof of residency</li> <li>• Ownership/use status</li> <li>• Proof of entitlement, such as title deeds</li> <li>• Details of the land and income loss</li> <li>• Whether the owners/ shareholders are categorised as poor (yes or no)<sup>57</sup></li> <li>• Gender (female/male)</li> <li>• Age<sup>58</sup></li> <li>• Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> <li>• If vulnerable, <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)<sup>59</sup></li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of commercial non-arable land</b>	Formal tenants and formal users including vulnerable  (Land parcels relating to depot land, Bab Sharq Station and Sporting Station)	<ul style="list-style-type: none"> <li>• Proof of use e.g. formal rental/usufruct agreement or verbal agreements in place with owner</li> <li>• Details of the land and income loss (i.e. if 20% or more of their productive land is affected, etc.)</li> <li>• Whether the owners/shareholders are categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> </ul>

<sup>57</sup> According to the Central Agency for Public Mobilization And Statistics CAPMAS, the average poverty line is 736 EGP per person per month, a family consisting of two adults needs 1667 EGP per month to meet its basic needs, a family consisting of two adults and two children 2,691 EGP per month. The poverty line was built for each family according to its age and gender structure and its place of residence (Poverty Indicators, Income, Expenditure and Consumption Research, CAPMAS, 2017-2018).

<sup>58</sup> Proof of age required to establish eligibility for LRAPs available for PAPs over 65 years of age.

<sup>59</sup> Those who are cumulatively impacted by this Project and other investments/ projects recently complete or ongoing or yet to commence.

Impact	PAP Group	Information Required
		<ul style="list-style-type: none"> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of rented business premises</b>	Shop business owners including vulnerable (including stationary, mobile and informal vendors)	<ul style="list-style-type: none"> <li>• Proof of business ownership (formal or verbal)</li> <li>• Rental agreement with ENR</li> <li>• Details of the land used by business</li> <li>• Business owner categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Having any disability (yes or no) and/or have a family member with a chronic illness who is part of the affected PAP household</li> <li>• Qualifications and previous experience (CV and references, if available)</li> <li>• Other business-owned assets</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of structures and commercial buildings</b>	Owners of structures and commercial buildings including vulnerable	<ul style="list-style-type: none"> <li>• Ownership/use status of the structure and/or building</li> <li>• Proof of entitlement, such as title deeds</li> <li>• Whether the owners are categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Whether the owners have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of structures and commercial buildings</b>	Formal tenants including vulnerable	<ul style="list-style-type: none"> <li>• Use status of the structure and/or commercial building, including rental / usufruct agreements</li> <li>• Whether the formal tenants are categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Whether the formal tenants have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> </ul> </li> </ul>

Impact	PAP Group	Information Required
<b>Permanent loss of trees</b>	Owners of the trees including vulnerable	<ul style="list-style-type: none"> <li>○ Evidence of welfare support provided by the State</li> <li>● Proof of ownership e.g. verbal agreements in place with owner and/or testaments from witnesses confirming ownership of trees</li> </ul>
<b>Temporary loss of commercial non-arable land</b>	Landowners / shareholders including vulnerable  (Land parcels relating to depot land, Bab Sharq Station and Sporting Station)	<ul style="list-style-type: none"> <li>● Proof of residency</li> <li>● Ownership/use status</li> <li>● Proof of entitlement, such as title deeds</li> <li>● Details of the land and income loss</li> <li>● Whether the owners/shareholders are categorised as poor (yes or no)</li> <li>● Gender (female/male)</li> <li>● Age<sup>60</sup></li> <li>● Whether the owners/shareholders have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> <li>● If vulnerable, <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Temporary loss of rented business premises</b>	Shop business owners and formal tenants and informal users (including vulnerable) outside and adjacent to the Project alignment that need to be closed temporarily during construction	<ul style="list-style-type: none"> <li>● Proof of business ownership (formal or verbal)</li> <li>● Rental agreement with ENR / witness statement confirming informal use</li> <li>● Details of the affected business</li> <li>● Business owner categorised as poor (yes or no)</li> <li>● Gender (female/male)</li> <li>● Age</li> <li>● Having any disability (yes or no)</li> <li>● Qualifications and previous experience (CV and references, if available)</li> <li>● Other business-owned assets</li> <li>● If vulnerable, <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of livelihood</b>	Formal and informal business owners (including stationary shops, kiosks, cafeterias and mobile vendors) plus vulnerable PAPs permanently affected by loss of income due	<ul style="list-style-type: none"> <li>● Business owner status</li> <li>● Proof of business ownership (formal or verbal)</li> <li>● Details of income loss to business owner</li> <li>● Business owner categorised as poor (yes or no)</li> <li>● Gender (female/male)</li> <li>● Age</li> <li>● Having any disability (yes or no)</li> <li>● Qualifications and previous experience (CV and references, if available)</li> </ul>

<sup>60</sup> Proof of age required to establish eligibility for LRAPs available for PAPs over 65 years of age.

Impact	PAP Group	Information Required
	to interrupted business activities	<ul style="list-style-type: none"> <li>• Other business-owned assets</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Permanent loss of livelihood</b>	Business employees including vulnerable of stationary shops, kiosks and cafeterias permanently affected by loss of income due to interrupted business activities	<ul style="list-style-type: none"> <li>• Business employee status</li> <li>• Proof of employment contract (formal or verbal)</li> <li>• Details of income loss to employee</li> <li>• Business employee categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Having any disability (yes or no)</li> <li>• Qualifications and previous experience (CV and references, if available)</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Temporary loss of livelihood</b>	Business employees including vulnerable of stationary shops, kiosks and cafeterias temporarily affected by loss of income due to interrupted business activities	<ul style="list-style-type: none"> <li>• Business employee status</li> <li>• Proof of employment contract (formal or verbal)</li> <li>• Details of income loss to employee</li> <li>• Business employee categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Having any disability (yes or no)</li> <li>• Qualifications and previous experience (CV and references, if available)</li> <li>• If vulnerable,               <ul style="list-style-type: none"> <li>○ Illiterate (yes or no)</li> <li>○ Cumulatively affected (yes or no)</li> <li>○ Previously subject to expropriation (yes or no)</li> <li>○ Women-headed household (yes or no)</li> <li>○ Evidence of welfare support provided by the State</li> </ul> </li> </ul>
<b>Damage to houses, shops and other establishments during construction</b>	Property/business owners and tenants in cases of owned building extensions, including vulnerable	<ul style="list-style-type: none"> <li>• Proof of residency</li> <li>• Ownership/use status</li> <li>• Proof of entitlement, such as title deeds</li> <li>• Details of the land and income loss</li> <li>• Type of affected parcel</li> <li>• Owners categorised as poor (yes or no)</li> <li>• Gender (female/male)</li> <li>• Age</li> <li>• Whether the owners have any disability (physical and/or mental) and/or have a family member with a chronic illness who is part of the affected PAP household</li> </ul>

Eligibility of PAPs will be assessed and confirmed by NAT during LRAPs consultations and the preparation of the LRP.

### 11.3 Nationwide Ongoing Development Initiatives and Key Institutions

In developing this LRP, ongoing initiatives and organisations near the Project were taken into consideration. The following relevant initiatives and organisations were identified, and will be integrated in the LRAPs:

- Social welfare and Support programmes directed by the Ministry of Social Solidarity, which include:
  - **Solidarity and dignity "Takaful and Karama" (TKP) Programme<sup>61</sup>** is a conditional cash transfer programme launched by the Ministry of Social Solidarity under the umbrella of developing social safety nets supported by the World Bank. This programme provides support to poor women and children, poor people with disabilities, poor orphans and poor widows aiming to increase women's decision-making powers, human capital in health and education and productive inclusion;
  - **Chance "Forsa" Programme**, the programme represents an integrated system of empowerment and qualifications to enter the labour market. The programme aims to graduate beneficiaries of the national cash transfer programme, from being dependent on transfers from government aid to economic self-reliance by enabling them to engage in wage employment or sustainable economic enterprises;
  - **Social Solidarity Pension for the Disabled** is a permanent financial aid programme, one of the social welfare programs offered by the Ministry of Social Solidarity to support the disabled; and
  - **Micro and Small Enterprises Financing Initiatives.** Small business finance programmes help empower small business owners, such as fruit and vegetable sellers. Through these programmes, they can purchase a tricycle with an attached box used as a small transport vehicle" to sell vegetables/ fruits/ fish/ transport goods and be licensed. NAT can contribute to paying the transaction costs of microfinance initiatives to facilitate the involvement of the PAP in a programme that will provide him with a sustainable source of income and help improve his situation for the better<sup>62</sup>.
- Vocational training programmes, through the Training provided by the Department of Productive Efficiency and Vocational Training - Ministry of Industry.
- The National Council for Women, National Strategy Programmes for the Empowerment of Egyptian Women 2030. The strategy includes four integrated axes of action, including economic empowerment and social empowerment of women.

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<sup>61</sup> <https://www.worldbank.org/en/results/2020/11/17/takaful-and-karama-a-social-safety-net-project-that-promotes-egyptian-women-empowerment-and-human-capital>

<sup>62</sup> This is a proposal that can be benefited from through a cooperation protocol between the Ministry of Transport and the Ministry of Social Solidarity to achieve the greatest benefit from the programs offered by the Ministry of Social Solidarity.

**11.4 Livelihood Restoration Measures**

**Table 11-2** provides a list of the livelihood restoration measures that will be the basis on which NAT will develop the LRAPs. Vulnerable PAPs, including women who meet the vulnerability criteria, will be eligible for the same livelihood restoration measures as all other PAPs. As presented in **Chapter 7: Land Acquisition Process and Principles**, male and female PAPs will be consulted together with when choosing entitlements, including the most suitable LRAPs. This is to ensure that women’s preferences will be accounted for in the choice of livelihood restoration options. The measures listed in **Table 11-2** will be provided in addition to the entitlements included in the Entitlements Matrix in **Chapter 9: Entitlements and Compensation**.

Table 11-2: Livelihood Restoration Measures

Category	Livelihood Restoration Measure	Description
Business premises (Shop, Kiosk, cafeteria)	Business support for business owner	<p>Businesses (formal and informal) will be affected by the Project (both business owners and employees), as detailed in <b>Chapter 5: Affected People and Assets</b>. NAT will provide the following assistance to affected businesses (support for employees is detailed in the next row):</p> <ul style="list-style-type: none"> <li>• Support in accessing new markets for products/services and in advertising new business location to customers;</li> <li>• Access to technical experts/consultants in their sector to analyse business activities who will recommend improvements; and</li> <li>• Effectively and sensitively relocating business activities, if required.</li> <li>• Providing support for the sales of goods that were not sold before relocation or close of business.</li> </ul>
	Support for employees	<p>NAT will support and financially assist the PAP to engage with suitable institutions that provide suitable training to the PAPs who are economically displaced and require either temporary employment while businesses are being relocated, or alternative employment if employment is no longer provided after the expropriation of a business.</p> <p>The following livelihoods have been identified as being potentially available for suitably qualified PAPs, on a temporary, or permanent basis:</p> <ul style="list-style-type: none"> <li>• Temporary employment during construction – NAT will ensure that the Contractor provides a Local Procurement Plan to provide opportunities for local businesses and workers (e.g. subcontractors, catering and accommodation). The Contractor will establish a Local Employment Champion to work with NAT to facilitate PAPs employment in construction. The recruitment process will be clearly defined by NAT and the Contractor through this Plan, providing details on: how PAPs can apply, screening tests and eligibility criteria for available employment.</li> <li>• Permanent employment during operation – NAT will liaise with PAPs working temporarily during construction to provide employment opportunities during the operation of the Project. This could include metro maintenance, security, catering or cleaning roles. NAT will prioritise PAPs when recruiting for post-employment opportunities that become available during construction and operation.</li> <li>• NAT will liaise with businesses within these areas to proactively identify job opportunities for PAPs, if needed.</li> </ul>

Category	Livelihood Restoration Measure	Description
		<p>NAT will provide the following financial and administrative assistance if employment is no longer provided after the expropriation of a business:</p> <ul style="list-style-type: none"> <li>• Support in registering those who are seeking employment;</li> <li>• Facilitate job placement;</li> <li>• Provide opportunities for vocational skills development in local educational institutions;</li> <li>• Business management training;</li> <li>• Literacy, numeracy and language training; and</li> <li>• Classroom and on the job training.</li> </ul> <p>NAT will work with supporting organisations to provide this assistance in establishing alternative livelihoods upon commencement of the implementation of the RAP and during the construction phase. This support will also be provided by NAT for up to 2 years into the operation phase of the Project.</p>
	Alternative livelihoods – new business development and support	<p>Some PAPs will prefer to begin new businesses themselves, rather than seek employment. For this category of PAPs, NAT will therefore provide training, administrative assistance and financial support .</p> <p>As part of this assistance, NAT will provide connections and costs for guidance and training on business establishment (legal forms and documentation, registration, business planning, equipment, recruitment etc.) until the business is established. They will also find potential access to credit, if required, will monitor business activity for any issues and provide regular refresher training.</p>
	Business formalisation	<p>There are existing businesses that will be affected by the Project that are informal and are not registered as a company. NAT will assist these informal businesses with their formal registrations should they wish. NAT will provide administrative support and cover registration fees, such as:</p> <ul style="list-style-type: none"> <li>• Workers and street vendors are registered in the labour office in the informal employment sector; and</li> <li>• Commercial activities registration is done in the Commercial Registry Department and a tax card is made at the Tax Office.</li> </ul>
<b>Special Assistance for Vulnerable Groups</b>	One-off cash support for poor and elderly and PAPs with disabilities who are not actively engaged with land activities	<p>NAT will provide a one-off cash payment for poor, elderly or disabled PAPs who have lost their land and do not have the capacity to engage in economic activity due to their vulnerability.</p> <p>This measure will target vulnerable PAPs that do not have capacity to engage in other livelihood assistance packages provided for livelihood restoration.</p>

Category	Livelihood Restoration Measure	Description
	Transitional allowance for those who are significantly affected	<p>This measure will target vulnerable PAPs who are significantly affected by loss of land and/or household income due to the Project, and are not working in a job that provides a regular income.</p> <p>As well as the compensation provided for lost income and land under the Entitlement Matrix, these significantly-affected persons will also be provided with a one-off cash payment, equivalent to 6 months of the basic salary under Egyptian Law.</p>
	Specific support for physically relocated vulnerable PAPs with chronic illness and disabilities (including the elderly with mobility issues)	<p>Vulnerable people who lose livelihoods will have some specific support measures in place, especially those with disabilities. All of these circumstances may limit their ability to have alternative livelihood opportunities or places that will need to be considered. This can be done through the following measures:</p> <ul style="list-style-type: none"> <li>Integrating those who are able to work in vocational training programmes through the training centres of the Ministry of Industry, as well as vocational training through the empowerment programmes of the Ministry of Social Solidarity;</li> <li>Providing wheelchairs for PAPs who do not have the ability to move;</li> <li>Providing assistance in involving the elderly in relevant social care programmes provided by the Ministry of Social Solidarity (permanent pension/ financial aid).</li> </ul> <p>In addition, NAT will ensure that compensation includes:</p> <ul style="list-style-type: none"> <li>Providing a disability access opportunity such as mobility aids, if necessary. Including providing job opportunities in construction sites for the disabled in accordance with the national laws, through the construction contractor, with priority given to the disabled PAPs (Labor Law 12 of 2003 and Law No. 10 of 2018 Rights of Persons with Disabilities includes providing employment opportunities for the disabled at 5%) <ul style="list-style-type: none"> <li>Support to access to and register with national social support programmes offered by the Ministry of Social Solidarity.</li> </ul> </li> </ul> <p>This measure will target vulnerable PAPs who are significantly affected by loss of livelihoods.</p>
	Support to access to and register with national social support programme	<p>NAT will assist in collaboration with social services to ensure PAPs retain means tested benefits which might be lost due to income from compensation. In addition, assistance will be provided to assist in the registration of benefits to new places of residence (particularly for vulnerable people).</p>

Category	Livelihood Restoration Measure	Description
		Social programmes from the government are available to vulnerable groups. NAT will provide support and administrative assistance to eligible PAPs in accessing these programmes (if not already accessed).
	Location-dependent elderly persons	<p>Specific support for physically relocated vulnerable PAPs with disabilities (including the elderly with mobility issues) will be provided by NAT in the form of a one-off cash payment (3 months average wages) for poor, elderly or disabled PAPs who have lost their livelihoods and do not have the capacity to engage in economic activity due to their vulnerability.</p> <p>NAT will provide assistance and support to elderly persons from the eligible PAPs in accessing relevant government social welfare programmes available to vulnerable groups, through the Ministry of Social Solidarity programs (if they are not already registered).</p> <p>This measure will target vulnerable PAPs that do not have capacity to engage in other livelihood assistance packages provided for livelihood restoration.</p>
	Women headed households	<p>Supporting access to and registration in the national social support programmes to support the empowerment of female breadwinners and poor families (if they are not already registered with it), which is offered by the:</p> <ul style="list-style-type: none"> <li>• The National Council for Women; and</li> <li>• Ministry of Social Solidarity.</li> </ul> <p>NAT will provide specific support for physically relocated vulnerable PAPs, including women headed households, of a one-off cash payment (3 months of average earnings) to cover the period up to their formal enrolment in one of the empowerment programmes provided by the aforementioned bodies.</p>
	Poor PAPs	<p>Supporting access to and registration in the national social support programmes offered by the Ministry of Social Solidarity.</p> <p>NAT will provide assistance and support to eligible poor PAPs in vocational training programmes through the training centres of the Ministry of Industry for those who are able to work.</p>
	PAPs taking on the role of primary carer for household member	NAT will provide assistance and support to eligible PAPs who are able to attend vocational training through the training centres of the Ministry of Industry, as well as, such training via the empowerment programmes provided by the Ministry of Social Solidarity.

Category	Livelihood Restoration Measure	Description
		<p>NAT can provide assistance and support to eligible PAPs to facilitate involving them in small and micro-enterprise financing initiatives programmes with the Ministry of Social Solidarity to improve living conditions. NAT can contribute to paying the transaction costs of microfinance initiatives to facilitate the involvement of the PAP in a programme that will provide PAP with a sustainable source of income and help improve his/ her situation for the better.</p>
	<p>PAPs who have not had regular wage-based income with a job at which they work more than one year.</p>	<p>NAT will provide assistance and support to eligible PAPs with vocational training through the training centres of the Ministry of Industry, as well as such training via the empowerment programmes of the Ministry of Social Solidarity.</p> <p>NAT will also provide priority in Project-related employment for members of vulnerable households (if at legal working age).</p>

## 12. MONITORING AND REPORTING

### 12.1 Purpose

The PMU is required to establish a procedure to monitor and evaluate the implementation of the RAP and take corrective actions, as necessary, to achieve compliance with national legislation and Lender's requirements. This chapter sets out the monitoring and reporting arrangements and responsibilities that will ensure that the land acquisition and resettlement process is fully implemented in accordance with this RAP.

This RAP sets out measures to mitigate the potential negative impacts of physical and economic displacement that could be caused by the Project. The NAT Senior Management Team will approve and oversee the implementation of the RAP to ensure it is carried out in accordance with Lender's requirements.

The NAT Senior Management Team will be responsible for appointing the PMU Social Specialist to implement the RAP and conduct internal monitoring, with support from the PMU Manager and Land Acquisition and Livelihood Restoration Specialist. The PMU Social Specialist will be responsible for appointing an External Independent Monitoring Consultant who will undertake external monitoring, every 6 months, during implementation of the RAP alongside a completion audit.

The objective of the monitoring and reporting is to provide timely feedback to the NAT Senior Management Team and the Lender's on the effective implementation of this RAP. It will also ensure that any unforeseen impacts, issues, and successes related to physical and economic displacement are identified as early as practicable. Appropriate measures will be identified to address such impacts and issues and maximise successes in livelihood restoration and improvement in a timely manner and will allow for adjustment to the RAP implementation process, where appropriate. RAP monitoring also facilitates grievance management aiming to reduce the number and scale of grievances raised by PAPs. Internal and external monitoring reports will be submitted to lenders periodically to align with their requirements.

### 12.2 Monitoring and Evaluation Framework

The monitoring and evaluation framework designed for this RAP includes the following three components:

- Performance monitoring (internal monitoring) by Land Acquisition and Livelihood Restoration Specialist, on behalf of NAT and reviewed by the External Independent Monitoring Consultant;
- Impact monitoring (external monitoring) by the External Independent Monitoring Consultant every 6 months during the implementation process; and
- A completion audit by the RAP Completion Audit Consultant.

The External Independent Monitoring Consultant above will be supported by the Land Acquisition and Livelihood Restoration Specialist and the CLO to ensure that all grievances and community views are included in the RAP monitoring reports.

The RAP monitoring will be undertaken using the monitoring and evaluation process presented in **Table 12-1**. The monitoring undertaken through this framework will use the 4 monitoring indicators (consisting of input<sup>63</sup>, output<sup>64</sup>, process<sup>65</sup> and outcome/impact<sup>66</sup> indicators) listed in **Table 12-2**.

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<sup>63</sup> **Input indicators** include the resources in terms of people, equipment and materials that go into the RAP. Examples, of input indicators in the RAP include:

- A) The sources and amounts of funding for various RAP activities.
- B) The establishment of the land acquisition team.

<sup>64</sup> **Output indicators** include activities and services produced with inputs. Examples of output indicators in a RAP can be a database of land acquisition, and the completion of payments made for the loss of assets.

<sup>65</sup> **Process indicators** present the changes that occur during and after the RAP implementation and the extent of activities and services that are provided. An example would be the ongoing implementation of grievance mechanism, public consultation and continued awareness raising for the Project.

<sup>66</sup> **Outcome/impact indicators** cover the delivery of mitigation activities and the measures taken to compensate physical and economic displacement triggered by the Project, such as livelihood restoration and compensation of overall income levels, the changes in PAPs and community attitudes towards the Project, and the use of compensation payments for income generating activities. These indicators will also define the change in long-term measurable results, e.g. in behaviour and attitudes, living standards, and conditions. These outcome/impact indicators may be subject to change by the Independent External Monitoring Consultant. The External Independent Monitoring Consultant carrying out the completion audit will use these outcome/impact indicators, to assess whether restoration activities of the RAP are effective in maintaining and improving the social and economic condition of PAPs.

**Table 12-1: Monitoring and Evaluation Framework**

Monitoring and Evaluation Activity	Type of Information/Data Collection Methods	Source of Information/Data Collection Methods	Responsibility for Data Collection Analysis and Reporting	Frequency
<b>Performance Monitoring (Internal Monitoring)</b>	Measurement of monitoring indicators against the proposed timeframes, including ongoing procurement of in-kind compensation and other allowances (as detailed in <b>Chapter 13: Implementation Schedule and Budget</b> ).	Bimonthly (every 2 months) summary reports on progress against monitoring indicators in <b>Table 12-2</b> .	Land Acquisition and Livelihood Restoration Specialist with the support of CLO	Bimonthly reports will be submitted to Lenders.
<b>Impact Monitoring (External Monitoring)</b>	Tracking effectiveness of process and outcomes using the monitoring indicators in <b>Table 12-2</b> .  Feedback on PAP satisfaction with the RAP.	<b>6 monthly quantitative and qualitative surveys.</b>  Review of internal monitoring records. Community meetings focus groups and workshops and other consultation with PAPs (as detailed in the <b>SEP</b> ). In addition to, reviews of grievance mechanism and stakeholder consultations (as detailed in the <b>SEP</b> ).	<b>External Independent Monitoring Consultant with the support of Land Acquisition and Livelihood Restoration Specialist and CLO</b>	<b>6 monthly reporting to Lenders.</b>
<b>RAP Completion Audit</b>	Measurement of all monitoring indicators with an emphasis on the monitoring indicators in <b>Table 12-2</b> .	External independent assessment/sign-off report on completion (forecasted 06/2025 based on performance and impact monitoring reports, independent surveys and consultation with affected persons).	<b>RAP Completion Audit Consultant, with the support of Land Acquisition and Livelihood Restoration Specialist and CLO</b>	<b>On completion of RAP timetable (forecasted 06/2025) as agreed between PMU and Lenders.</b>

### 12.2.1 Monitoring Indicators

**Table 12-2** below presents the 4 monitoring indicators to be reported against by the Land Acquisition and Livelihood Restoration Specialist and the External Independent Monitoring Consultant. NAT will provide the External Independent Monitoring Consultant with the baseline data from the household surveys in order to measure these indicators against the baseline for internal monitoring purposes on behalf of NAT.

Gender disaggregated data will be gathered for each indicator, where possible, in order to evaluate the specific impact of the RAP on women.

Table 12-2: Monitoring Indicators

Indicator	Measure	Frequency of Monitoring / Reporting
<b>1) Input Indicators</b>		
Overall spending on land acquisition and resettlement (including a breakdown of costs).	Cash compensation.	Quarterly
	Costs of providing livelihood assistance and support, by type of assistance/support.	
	Consultation and engagement costs.	
	Costs of evaluators and surveyors.	
	Costs of External Independent Monitoring Consultant(s).	
	Costs of vehicles, etc.	
	Other costs (and type).	
Total number of PAPs, who will need to be compensated, including owners of private land parcels, tenants of shops kiosks and cafeterias located in stations, station informal vendors and informal mobile vendors within the Project alignment.	<p>The PAPs data has been received through the surveys and asset inventory update (detailed in <b>Chapter 9: Entitlements and Compensation</b>).</p> <p>Updates will be made continually as the Land Acquisition and Livelihood Restoration Specialist progresses the identification and compensation of all PAPs. Provide gender disaggregated data if possible.</p>	Quarterly
Number of formal and informal businesses that must be relocated.	Data on affected businesses has been received through the surveys and asset inventory update (detailed in <b>Chapter 9: Entitlements and Compensation</b> ). Provide gender disaggregated data if possible.	Quarterly

Indicator	Measure	Frequency of Monitoring / Reporting
	Updates will be made continually as the Land Acquisition and Livelihood Restoration Specialist and PMU Social Specialist progress the identification and compensation of all formal/informal businesses that have been relocated by the Project.	
<b>2) Output Indicators</b>		
Number (and percentage) of PAPs who signed compensation agreements. (Cases of negotiated settlements)	The percentage should be calculated from the total number of PAPs who signed compensation agreements. Provide gender disaggregated data if possible.	Quarterly
Number (and percentage) of urban commercial land, structures and commercial buildings for which compensation agreements were signed.	The percentage should be calculated from the total number of negotiated urban commercial land parcels structures and commercial buildings, as identified by the surveys and asset inventory update (detailed in <b>Chapter 9: Entitlements and Compensation</b> ).	Quarterly
Number (and percentage) of PAPs who refused to sign compensation agreements/are still deciding.	The percentage should be calculated from the total number of PAPs provided with compensation agreements. If possible, a breakdown of reasons why compensation agreements have been refused (or still have not been accepted) should be provided, with separate data on those that have not been negotiated and those that have been unattended. Provide gender disaggregated data if possible.	Quarterly
Number (and percentage) of PAPs who have appealed to court.	The percentage should be calculated from the total number of PAPs who have opened court cases for the compensation of lost assets. If possible, a breakdown of reasons why compensation agreements have been refused (or still have not been accepted) should be provided, with gender disaggregated data if possible.	Quarterly
Number (and percentage) of compensation agreements executed (compensation paid in full).	The percentage should be calculated from the total number of PAPs provided with compensation agreements. With separate reporting of compensation in accordance with national legislation and compensation in accordance with Lender’s requirements.	Quarterly

Indicator	Measure	Frequency of Monitoring / Reporting
Number (and percentage) of businesses that have been relocated.	The percentage should be calculated from the number of businesses which were identified as having to be relocated.	Quarterly
Number of PAPs assisted by the PMU by type of assistance and by category (owners/users and by gender).	Assistance to prepare new ownership/tenancy documents (monetary assistance, provision of information, legal aid etc.).	Quarterly
	Assistance for legal costs.	
	Assistance to move or payment of moving costs.	
	Assistance provided through the livelihood restoration programme (as detailed in <b>Chapter 11: Livelihood Restoration Plan</b> ).	
<b>3) Process Indicators</b>		
Number of PMU external consultants dedicated to the implementation of this RAP.	Members of the PMU (PMU Manager, Social Specialist, Land Acquisition and Livelihood Restoration Specialist, CLO).	Quarterly
	Members of other NAT and governorate departments.	
	Skill trainers and other supporting specialists included in <b>Chapter 11: Livelihood Restoration Plan</b> .	
	Training activities completed as detailed in <b>Chapter 11: Livelihood Restoration Plan</b> .	
	External Independent Monitoring Consultant.	
	RAP Completion Audit Consultant.	

Indicator	Measure	Frequency of Monitoring / Reporting	
Number of newly received, open and closed grievances; any trends in grievances received; and average time for grievance processing.	Measure the time interval between grievance registration and closure as summarised below. <ul style="list-style-type: none"> <li>• Immediate grievance registration;</li> <li>• CLO contact complainant within 2 working days following complainant registration to explain the Project response process to the grievance;</li> <li>• 10 working days for CLO to investigate and respond to complainant (informing them of the proposed corrective measure); and</li> <li>• Implementation of the corrective measure and its follow up have to be communicated to the complainant and recorded in the grievance register.</li> </ul> Grievances should be reviewed in accordance with the process detailed in the <b>SEP</b> .	Quarterly	
	Number of PAPs using the Grievance Mechanism (disaggregated by channel, gender, age).		
	Number of cases resolved at Project-level (disaggregated by gender).		
	Number of unresolved cases at Project level (disaggregated by gender).		
	Timeframe for responding to and resolving grievances (disaggregated by gender).		
	Number of cases referred to court and subjects of court cases (disaggregated by gender).		
Engagement activities.	Number of community meetings undertaken.	Quarterly	
	Percentage of women participating in community meetings.		
	Number of focus groups and workshops targeting vulnerable groups including women.		
Budget and timeframes.	Budget and timings of achieved activities against the agreed RAP implementation schedule.	Quarterly	

Indicator	Measure	Frequency of Monitoring / Reporting
	Total funds disbursement against the RAP budget presented in <b>Chapter 13: Implementation Schedule and Budget.</b>	
<b>4) Outcome/Impact Indicators</b>		
Average time for payment of compensation.	Average time between acceptance of the offer/signing of the compensation agreements and the execution of compensation. This should also be internally monitored by the PMU Social Specialist to determine if there are delays which could put PAPs in a difficult position.	Every 6 months (external monitoring)
How was the received cash compensation used/invested?	Survey to determine what affected people used compensation for, such as: replacement land, replacement structures, commercial buildings, other assets or investments, and not invested for anything.	Every 6 months (external monitoring)
Has compensation been paid at full replacement cost?	Investigate whether recipients of cash compensation who bought replacement land, replacement non-residential buildings and secondary structures (business and facilities) were able to purchase a similar (or better) property.	Every 6 months (external monitoring)
Re-establishment of incomes/livelihoods.	Assess whether those who were using land as a source of livelihood/income managed to re-establish this source and the same level of livelihood/income. Provide disaggregated data by gender.	Every 6 months (external monitoring)
	Assess whether informal users of land have re-established their previous level of income. Provide disaggregated data by gender.	
	Calculate the number of PAPs that benefited from the Livelihood Restoration Plan (disaggregated by gender).	
	Number and type of vocational training courses delivered and number of PAPs (disaggregated by gender) who attended to evaluate the progress in implementing the livelihood restoration plan.	

Indicator	Measure	Frequency of Monitoring / Reporting
	<p>Percentage of displaced persons (disaggregated by gender) who improved their income and standard of living using indicators such as income, employment opportunities, costs of goods and services, poverty, life expectancy, inflation rate and the number of paid holidays people receive each year.</p> <p>Assess vulnerability segregated data on livelihood re-establishment.</p>	
Re-establishment of businesses.	<p>Assess whether relocated businesses have been successfully re-established. Survey of net income and comparison to baseline data as presented in <b>Chapter 5: Affected People and Assets</b>.</p> <p>Assess whether business employees are still working after re-location. (If not, establish reasons why).</p> <p>Survey of employees and their earnings and comparison with baseline data.</p>	Every 6 months (external monitoring)
Social stability.	Identify whether the Project has caused significant access issues for PAPs.	Every 6 months (external monitoring)
Health	<p>Identify whether the Project caused health problems (physical and/or mental health issues) in nearby communities. This can be measured with submission of grievances and complaints through the grievance mechanism.</p> <p>Identify whether the resettlement process aggravated health concerns of PAPs.</p>	Every 6 months (external monitoring)
Rehabilitation of infrastructure, public facilities and access.	Identify whether those living close to the Project are able to efficiently cross the alignment to access community services (such as schools, hospitals, etc).	Every 6 months (external monitoring)
Level of satisfaction of PAPs.	Identify how satisfied displaced businesses (formal and informal) have been with the resettlement. Provide disaggregated data by gender.	Every 6 months (external monitoring)

Indicator	Measure	Frequency of Monitoring / Reporting
	Identify how satisfied landowners have been with the resettlement. Provide disaggregated data by gender.	
	Identify how satisfied land users (formal and informal users) have been with the resettlement. Provide disaggregated data by gender.	
	Identify how satisfied nearby communities have been with the Project’s environmental, health, safety and social measures. Provide disaggregated data by gender.	

## 12.3 Monitoring

The internal monitoring process will be carried out through:

- **Database Monitoring** – All socio-economic information on each PAP and the list of their affected assets will be stored in a database that will be the responsibility of the Land Acquisition and Livelihood Restoration Specialist, with support from the PMU Social Specialist to maintain. In addition, the database will also include the information on the boundaries of each affected land parcel available in the Geographic Information System (GIS) format.
- **Follow-up Activities** – The follow up on the implementation of this RAP will ensure that the activities are implemented within the dates specified in **Chapter 13: Implementation Schedule and Budget**. This process will also help to modify and re-schedule activities where appropriate, to ensure that the RAP implementation is completed on time and as planned.

### 12.3.1 Internal Monitoring

#### Objectives

- To monitor and report on the land acquisition process which will affect other Project activities;
- To measure and report progress against the RAP schedule;
- To verify that agreed entitlements are delivered in full to affected people;
- To identify any problems, issues or cases of hardship resulting from physical and economic displacement, and to develop appropriate corrective actions, or where problems are systemic refer them to the NAT Senior Management Team;
- To monitor the effectiveness of the grievance mechanism (detailed in the **SEP**); and
- To periodically measure the satisfaction of PAPs.

#### Activities

- Liaison with the PMU, Contractor and PAPs to review and report progress against this RAP;
- Verification that compensation entitlements are being delivered in accordance with the RAP;
- Verification that agreed measures to restore or enhance livelihood are being implemented;
- Assessment of PAPs satisfaction with resettlement outcomes through socio-economic survey;
- Monitoring of the Grievance Mechanism in accordance with the **SEP**; and
- Preparation of quarterly summary reports on progress for each of the monitoring indicators and compensation disbursement updates/reports for NAT Senior Management and Lenders.

#### Implementation

It is intended that most of these activities will be carried out every 3 months (quarterly) by the PMU Social Specialist, with the External Independent Monitoring Consultant reviewing the reports, however some local consultants/NGOs may be required for support. The CLO will lead regular consultation with local communities through face to face meetings and small focus groups.

Additional Land Acquisition and Livelihood Restoration Specialist tasks for internal monitoring:

- Liaise with other designated officials as necessary within the wider NAT to collate up-to-date information on land acquisition progress such as agreement signing, compensation

disbursement, disbursement milestones, land areas under construction, land areas reinstated and the like;

- Liaison with the Land Acquisition and Livelihood Restoration Specialist to provide information on RAP implementation, progress and monitoring;
- Liaison with the CLO to gather information about progress, issues/incidents, grievances and issues; and
- Conducting semi-structured interviews and/or hardcopy/online surveys with a cross-section of PAPs to verify receipt of entitlements, review effectiveness of measures, assess satisfaction with outcomes (in accordance with the monitoring indicators shown in **Table 12-2**).

### 12.3.2 External Monitoring

#### Objectives

- To assess the effectiveness of the land acquisition process as well as compliance with this RAP;
- To verify that measures to restore or enhance PAPs quality of life and livelihood to pre-Project levels are being implemented satisfactorily and effectively; and
- To assess the extent to which the quality of life and livelihoods of affected communities have been restored using information provided by NAT as well as PAPs.

#### Activities

- Review grievance records (as detailed in the **SEP**) for evidence of non-compliance or recurrent poor performance in RAP implementation;
- Discussions with the CLO to review progress and identify issues;
- Validate the surveys completed by PMU of affected businesses on a sample basis to gauge the extent to which PAPs standards of livelihood have been restored or enhanced as a result of the Project;
- Assess overall compliance with the RAP requirements and Lender's requirements; and
- Prepare a summary compliance report for NAT Senior Management and Lenders on the RAP implementation progress, any issues arising and any necessary corrective actions.

#### Implementation

Every six months:

- The External Independent Monitoring Consultant would initially convene by teleconference, online/hardcopy surveys, or in person and discuss the review agenda;
- Travel to the Project site;
- Spend 3-4 days in the NAT office reviewing quarterly internal monitoring summary reports (including supporting documentation), interviewing the Land Acquisition and Livelihood Restoration Specialist, PMU Social Specialist, CLO and support teams (where relevant) as necessary to assess functioning of monitoring and grievance systems, assess progress against this RAP and identify issues arising;
- Spend 7-10 days on site to conduct interviews with a sample of PAPs, the PMU Social Specialist, Land Acquisition and Livelihood Restoration Specialist and supporting CLOs; and
- Develop key conclusions and recommendations based upon the relevant monitoring indicators detailed in **Table 12-2** and prepare an external monitoring report.

Additional External Independent Monitoring Consultant tasks for external monitoring:

- Liaison with the Land Acquisition and Livelihood Restoration Specialist to provide information on RAP implementation, progress and monitoring;
- Liaison with the CLO to gather information about progress, issues/incidents, grievances and issues; and
- Conducting semi-structured interviews and/or hardcopy/online surveys with a cross-section of PAPs to verify receipt of entitlements, review effectiveness of measures, assess satisfaction with outcomes (in accordance with the monitoring indicators shown in **Table 12-2**).

## 12.4 Completion Audit

### Objectives

A key objective of the RAP is that resettlement actions and mitigatory measures should lead to sustainable restoration or enhancement of PAPs pre-Project living standards and income levels. At such time as PAPs quality of life and livelihood can be demonstrated to have been sustainably restored to pre-Project levels, the resettlement process can be deemed “complete”.

Resettlement planning for the Project assumes that livelihood restoration of affected landowners will be completely restored through replacement land or other measures, community and social investment programs are well established.

### Activities

- Confirm that cash compensation for land and other affected assets have been paid in full;
- Confirm living standards of the affected population have been properly conceived, executed and restored;
- Verify that the physical inputs committed to in the RAP have been delivered and all livelihood restoration measures have been provided;
- Outline the corrective actions taken and assess whether a timely and solution-oriented manner was adopted;
- Assess the inclusion of vulnerable groups and informal users during RAP implementation;
- Measure the socio-economic status of the affected population against the baseline conditions of the population according to the monitoring indicators identified in this RAP and, if any modifications were required during RAP implementation;
- Assess the performance of the grievance mechanism in timely resolution of complaints raised and approach to Project consultation;

### Implementation

After finalisation of RAP implementation activities (anticipated 06/2025):

- The RAP Completion Audit Consultant would initially carry out a desk review by evaluating RAP internal and external monitoring reports in addition to other supportive documents and records developed during RAP implementation;
- Travel to the Project site;
- Spend 3-4 days in the NAT office interviewing the Land Acquisition and Livelihood Restoration Specialist, PMU Social Specialist, CLO and support teams (where relevant) as necessary to assess

functioning of monitoring and grievance systems, assess progress against this RAP and identify issues arising;

- Spend 7-10 days on site to conduct interviews with a sample of PAPs; and
- Assess whether the RAP implementation leads to sustainable restoration or enhancement of PAPs pre-Project living standards and income levels and prepare a completion audit report.

### 12.5 Reporting Requirements

The RAP reporting requirements are summarised in **Table 12-3** below.

**Table 12-3: RAP Reporting Requirements**

Report Type	Frequency	Prepared By	Reviewed By (and issued to)	Comments
<b>Internal RAP Monitoring Report</b>	Quarterly	Land Acquisition and Livelihood Restoration Specialist	PMU Social Specialist and NAT Senior Management  (Issued to Lenders)	10-15 page report (plus supporting documentation) summarising progress against the RAP; outline of any issues and agreed related actions; summary schedule of grievance status; minutes of any stakeholder or affected people consultations or meetings.
<b>External RAP Monitoring Report</b>	Every 6 months	External Independent Monitoring Consultant	Land Acquisition and Livelihood restoration Specialist, PMU Social Specialist, NAT Senior Management and Lenders  Findings to be made available publicly after presentation to the NAT Board.  (Issued to Lenders)	25-35 page report (plus supporting documentation) summarising assessment of PAP satisfaction with RAP implementation and Grievance Mechanism process, progress towards livelihood restoration; Lender’s requirements compliance; discussions of any RAP issues of concern; identification of any areas of non-compliance and agreed corrective actions; and summary of resettlement status.
<b>RAP Completion Audit Report and Reviews</b>	Upon completion of construction (1 report in total)	RAP Completion Audit Consultant	Land Acquisition and Livelihood Restoration Specialist, PMU Social Specialist, NAT Senior Management and Lenders.  Findings to be made available	RAP Completion Audit to verify PMU has complied with undertakings defined by the RAP and that land acquisition and compensation has been completed in accordance with the Lender’s requirements.

Report Type	Frequency	Prepared By	Reviewed By (and issued to)	Comments
			publicly after presentation to the NAT Board.	

## 13. IMPLEMENTATION SCHEDULE AND BUDGET

### 13.1 Implementation Schedule

This RAP is a live public document and will continue to be revised following Project approval to inform the resettlement programme through the various stages of Project development (construction and operation). It will be the responsibility of the PMU Land Acquisition and Livelihood Restoration Specialist to revise the RAP during construction and the NAT Social Specialist to revise the RAP during operation, if required. This RAP provides a timeline of actions (primarily consisting of RAP implementation and monitoring) between 2022-2025, when the Project will become fully operational.

**Table 13-1** below provides the key dates for the implementation of this RAP, covering all activities from RAP disclosure through to its implementation, monitoring, evaluation and completion. End dates are indicative as certain land parcels may be acquired later in the Project RAP implementation process, for example due to extended negotiations and court proceedings.

**Table 13-1: RAP Implementation Timeframes**

Item	Responsible Entity	Indicative Start Date	Indicative End Date
<b>RAP Disclosure</b>			
Disclosure of the RAP	NAT	08/2022	10/2022
<b>RAP Implementation (including land acquisition)</b>			
Asset inventory update	NAT	04/2022	06/2022
Identification of PAPs	NAT	05/2022	06/2022
Announcing RAP eligibility and entitlements to PAPs	NAT	08/2022	10/2022
Evaluation of individual PAP eligibility and entitlements	NAT	08/2022	12/2022
Preparation of draft contracts, including budget allocation for compensation amounts delivered through national legislation and the RAP Fund	NAT	09/2022	12/2022
Negotiations with PAPs (in person or virtually) and draft contracts issued to PAPs	NAT	09/2022	12/2022
Court proceedings (in the case of no agreement on the issued contracts)	NAT	10/2022	02/2023
PAP contract signing	NAT	10/2022	12/2022
Mobilisation of Construction Contractor	NAT Construction Contractor	01/2023	07/2023

Item	Responsible Entity	Indicative Start Date	Indicative End Date
Disbursement of compensation to PAPs under national legislation and landowners/users from RAP Fund <sup>67</sup>	NAT	10/2022	2026
Signing land entry protocols for land that will be temporarily transferred to the Construction Contractor <sup>68</sup>	NAT Construction Contractor	11/2022	2026
Deadline for handing over of the Project affected land and other assets (such as trees and structures) to the Contractor (excluding ongoing court cases)	NAT	03/2023	03/2023
Commencement of construction works	NAT Construction Contractor	02/2023	2025
Continuation of RAP implementation	NAT	03/2023	05/2025
Signing land exit protocols for land that will be transferred back to the landowner on completion of construction <sup>69</sup>		03/2023	2025
<b>Monitoring and Evaluation</b>			
Internal RAP performance monitoring by the PMU Land Acquisition and Livelihood Restoration Specialist, with reviews from the External Independent Monitoring Consultant	NAT Internal Monitoring Team	10/2022	04/2025
External RAP impact monitoring by the External Independent Monitoring Consultant (every 6 months)	External Independent Monitoring Consultant	04/2023	04/2025

<sup>67</sup> PAPs will be compensated in accordance with national legislation and/or from the RAP Fund where appropriate. Refer to **Chapter 9: Entitlements and Compensation** for further details.

<sup>68</sup> A Land Entry Protocol for each affected land parcel that will be transferred to the Contractor needs to be signed at least 3 days prior to physically entering the land parcel. The Land Entry Protocol shall be signed between the landowner/land user of the land parcel and the representative of the Contractor, being witnessed by the local ASD for the lands listed in the Ministerial Decree, ENR for stations and the alignment corridor. The Contractor will not enter any land parcels that have not been delivered to the Contractor through a Land Entry Protocol or for which they have established rights through a rental agreement with the relevant landowner.

<sup>69</sup> A Land Exit Protocol needs to be completed for land that is temporarily acquired and will be handed back to the original owner by the Contractor. The land will be fully reinstated to its prior condition or better by the Contractor before handover.

Item	Responsible Entity	Indicative Start Date	Indicative End Date
<b>Stakeholder Engagement</b>			
Establish and implement the grievance mechanism (as detailed in the project <b>Stakeholder Engagement Plan (SEP)</b> ).	NAT	09/2022	06/2025
Consultation meetings with PAPs (monthly during RAP implementation).	NAT	09/2022	05/2025
Negotiations with landowners and users (formal and informal) to agree entitlements and compensation amounts.	NAT	09/2022	05/2025
Ongoing engagement with PAPs, including vulnerable people, as part of the delivery of the <b>Livelihood Restoration Plan (Chapter 11)</b> and the <b>SEP</b> .	NAT	09/2022	05/2025
<b>Post RAP Completion</b>			
Continued operation of grievance mechanism during construction (as detailed in the <b>SEP</b> ).	NAT	02/2023	06/2025
Continued operation of grievance mechanism during operation (as detailed in the <b>SEP</b> ).	NAT	06/2025	Ongoing
Completion audit (upon completion of RAP anticipated 2025).	RAP Completion Audit Consultant	06/2025	09/2025

## 13.2 RAP Budget

### 13.2.1 Funding Arrangements

This Chapter presents the costs for implementing this RAP. It includes:

- All compensation costs;
- Costs of livelihood measures (inclusive of the livelihood restoration programme described in **Chapter 11: Livelihood Restoration Plan**); and
- Additional assistance allowances (such as legal fees and transportation costs).

It also includes the personnel costs for delivering this RAP, such as fees for the and the External Independent Monitoring Consultant.

The RAP implementation costs included in this Chapter will be financed through two separate funding sources:

- Funds allocated from the Ministry of Finance for implementation of the Law 10/1990 and its amendments in Law 1/2015, Law 24/2018 and Law 187/2020 (national legislation): This source will

provide compensation to PAPs in line with Egyptian legislation (see **Chapter 3: Legislative Framework**). Compensation provided through national legislation will be disbursed by the ASD.

- RAP Fund: A separate RAP Fund will be established by NAT to ensure cash and in-kind compensation meets full replacement values in accordance with Lender's requirements. Compensation provided through this RAP Fund will be disbursed by NAT.

The compensation (including livelihood restoration measures) to be provided to each PAP from both funding sources will be clearly presented in the contracts signed by NAT and each PAP. Compensation amounts paid under national law and the RAP Fund will be under separate contracts.

Payment of the compensation through national legislation to landowners and additional compensation provided through the RAP Fund to land users will be paid within 45 days of title deed transaction.

The full amounts of both allocated compensation amounts will be provided to a PAP before land is either permanently acquired and / or Land Entry Protocols are signed to access land temporarily. Only after delivery of this cash or in-kind compensation to the PAP, will the land be transferred to and accessible by, the Contractor. However, please note that some compensation may continue to be provided after the PAP vacates the expropriated land (e.g. through implementation of the specific livelihood restoration packages).

The below tables present the budget breakdown of all land acquisition and resettlement related costs for the project that will be covered in the above-mentioned two separate funding sources. If any of the costs mentioned in the below table exceed the anticipated amounts and cannot be covered within the contingency allocation, NAT commits to meeting any additional cost that arise through the allocation of an additional budget that will be sourced from the **[NAT to advise]**.

### 13.2.2 Budget Methodology

The compensation amounts described in this Chapter are based on the valuation methodologies presented in **Chapter 9: Entitlements and Compensation**. The total amounts are then calculated using the PAP data obtained during the asset inventory update and the socio-economic surveys.

The costs have been separated into the following categories:

- Compensation for land where in-kind replacement land is not feasible;
- Compensation for non-residential buildings and secondary structures;
- Compensation for income losses (business);
- Compensation for income losses (employees);
- Compensation for trees;
- Livelihood restoration programme costs; and
- Additional assistance allowances.

The compensation amounts presented for each of these categories represents totals that can be used for both cash compensation and in-kind compensation, as described in **Chapter 9: Entitlements and Compensation**. Exact figures cannot be provided for a number of categories (such as the livelihood restoration programme) as they will be mutually agreed between the PAPs and NAT through negotiations and specific choice of livelihood restoration activities – see **Chapter 7: Land Acquisition Process and Principles**. In these cases, estimations and methodologies for these amounts have been provided, alongside a contingency included in the RAP Fund.

### 13.2.3 Estimated Compensation Costs

The anticipated compensation costs for each cost category, including the funding source, are presented as follows:

- Table 13-2: Compensation Costs for Land (where in-kind replacement is not feasible);
- Table 13-3: Compensation for Income Losses (Business);
- Table 13-4: Compensation for Income Losses (Employees);
- Table 13-5: Compensation for Trees;
- Table 13-6: Livelihood Restoration Plan; and
- Table 13-7: Additional Assistance Allowances.

Table 13-2: Compensation Costs for Land (where in-kind replacement is not feasible)

Land Type <sup>70</sup>	Land Category	Number of Land Parcels	Total Area (m2)	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Non-agricultural Land <sup>71</sup>	Residential	2	1,419	50,000,000	-	50,000,000
Unviable Land	Economically unusable land	1	204,000	1,441,000,000	-	1,441,000,000
Additional budget for rental allowance		-	-	-	-	-
<b>TOTAL</b>		<b>3</b>	<b>205,419</b>	<b>1,491,000,000</b>	<b>-</b>	<b>1,491,000,000</b>

<sup>70</sup> Compensation for the land in Egypt is estimated by ASD and includes compensation for the buildings / structures located on these land parcels.

<sup>71</sup> Values of individual non-agricultural land parcels are determined on a case by case basis. The figure provided is the total compensation for all types of affected private residential housing land, affected private industrial land (including those currently in use and not in use).

Table 13-3: Compensation for Income Losses (Business)

Compensation for Income Losses - Business	Number of Businesses	Average Monthly Income Rate Loss Due to Expropriated Land (EGP)	Approximate Period of Income Loss	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Permanent Loss of Income for Business at Existing Location	27	4000	12 months <sup>72</sup>	-	324,000	324,000
Temporary Loss of Income for Business <sup>73</sup>	-	-	-	-	-	-
<b>TOTAL</b>	<b>27</b>	<b>4000</b>	<b>3 months</b>	<b>-</b>	<b>324,000</b>	<b>324,000</b>

<sup>72</sup> Depending on the duration of a business' transition following relocation, the proposed 1 year's net income cash compensation could be reduced to cover only the period required for the re-establishment of the business and restoration of livelihoods. However, should this be the case, this decision must be based on an assessment for each business owner carried out by a Social Officer prior to the decision, documented and fully agreed with the business owner.

<sup>73</sup> The current project design and construction activities do not anticipate any temporary loss of income for businesses. However, NAT has allocated a provisional amount to cover any potential temporary losses should they occur. This is envisaged as a temporary loss of income for 50% of the businesses.

Table 13-4: Compensation for Income Losses (Employees)

Compensation for Income Losses - Employees	Number of Employees	Average Monthly Income Rate Loss Due to Expropriated Land (EGP)	Approximate Period of Income Loss	Compensation Cost (Egyptian Pounds)		
				National Legislation	RAP Fund	Total
Permanent Loss of Income for Employees	4 <sup>74</sup>	2000	3 months	-	24,000	24,000
Temporary Loss of Income for Employees	-	-	-	-	-	-
<b>TOTAL</b>	<b>4</b>	<b>2000</b>	<b>3 months</b>	<b>-</b>	<b>24,000</b>	<b>24,000</b>

<sup>74</sup> This number has been added based on the results of the socio-economic survey (Chapter 5). According to the results of the socio-economic survey and FGDs with the shops tenants, the employees of the shops are not fixed and they change from time to time.

The employees will be counted by the Compensation Committee, a maximum of one month before the start of RAP implementation, in order to compensate those who will lose their income as a result of the project. The current project design and construction activities do not anticipate any temporary loss of income for employees. However, NAT has allocated a provisional amount to cover any potential temporary losses should they occur. This is envisaged as a temporary loss of income for 50% of the employees identified.

Table 13-5: Compensation for Trees

Type	Number of Trees	Compensation Cost (Egyptian Pounds)		
		National Legislation	RAP Fund	Total
Palm Trees	5 <sup>75</sup>	7,500 <sup>76</sup>	2,500 <sup>77</sup>	10,000
<b>TOTAL</b>	5	<b>7,500</b>	<b>2,500</b>	<b>10,000</b>

Table 13-6: Livelihood Restoration Plan

Type of Assistance/ Allowance	Compensation Cost (Egyptian Pounds)		
	National Legislation	RAP Fund	Total
Transportation	-	20,000	20,000
Utilities	-	25,000	25,000
Painting	-	20,000	20,000
Miscellaneous	-	20,000	20,000
<b>TOTAL</b>	-	<b>85,000</b>	<b>85,000</b>

Table 13-7: Additional Assistance Allowances

Type of Assistance/ Allowance <sup>78</sup>	Compensation Cost (Egyptian Pounds)		
	National Legislation	RAP Fund	Total
Additional Assistance Allowances			
<ul style="list-style-type: none"> <li>• [Additional costs to be added]</li> <li>•</li> </ul>			
<b>TOTAL</b>			

<sup>75</sup> This number has been added based on the results of the RAP team site visit to the depot land. Because the comprehensive ASD report has not yet been issued, the final inventory of the number and types of trees will be based on the ASD report.

<sup>76</sup> The price of palm trees has been added according to the Alexandria Agriculture Directorate price list (the price of a fruitful palm tree over 5 years old is 1500 EGP). The compensation for trees will be included in the total value of the land compensation.

<sup>77</sup> In the event that the palm trees are fruitful and will be planted on another land, the cost of transporting the trees will be added.

<sup>78</sup> Note that NAT will cover the costs of all legal fees of PAPs, however this cost is not presented in this Chapter.

### 13.2.4 Summary of Costs

The total cost estimated for the implementation of this RAP is shown in **Table 13-8**. All compensation costs are due to be dispersed prior to the commencement of construction works<sup>79</sup>. A 10% contingency has also been added to the total cost calculated for compensation to ensure that sufficient funding is available, if required, such as for further PAPs that might be identified, or if significant increases to compensation is required.

**Table 13-8: Summary of Costs**

Item	Compensation Cost (Egyptian Pounds)		
	National Legislation	RAP Fund	Total
<b>Compensation</b>			
Compensation for Land (where in-kind replacement is not feasible)	<b>1,491,000,000</b>	-	<b>1,491,000,000</b>
Compensation for Non-Residential Buildings and Secondary Structures	-	-	-
Compensation for Income Losses (Business)	-	<b>324,000</b>	<b>324,000</b>
Compensation for Income Losses (Employees)	-	<b>24,000</b>	<b>24,000</b>
Compensation of Trees	<b>7,500</b>	<b>2,500</b>	<b>10,000</b>
<b>Livelihood Restoration Programme Costs</b>	-	<b>85,000</b>	<b>85,000</b>
<b>Other Assistance Allowances</b>	-	-	-
<b>1% Contingency<sup>80</sup></b>	-	<b>15,000,000</b>	<b>15,000,000</b>
<b>TOTAL</b>	<b>1,491,007,500</b>	<b>15,411,500</b>	<b>1,506,419,000</b>

<sup>79</sup> This is based on the assumption that there are no lengthy delays during contract negotiations. It may be the case that some individual parcels may be delayed due to court proceedings.

<sup>80</sup> The Compensation Committee has estimated the value of 1% of the total estimated compensation as a **Contingency** item or any new compensation for PAPs groups potentially affected during construction, or any unspecified support and assistance to vulnerable PAPs at the present time. Any damages caused to structures including buildings due to construction activities will separately be covered under the contractors agreement and will be compensated by the contractor.

### 13.2.5 Updating Implementation Costs

The costs presented above will change during the implementation of this RAP, as a result of negotiations, any court proceedings, and where PAPs select specific replacement land, structures, livelihood restoration programme activities, and assistance allowances.

Therefore, the costs will be reviewed every quarter and updated where necessary in-line with the reality of the costs being incurred. NAT will monitor the costs throughout the implementation of this RAP.

### 13.2.6 RAP Management and Administrative Costs

NAT will appoint an External Independent Monitoring Consultant to provide independent analysis of the progress of the RAP implementation against the defined monitoring indicators in **Chapter 12: Monitoring and Reporting**. An overview of the costs for these services is provided in **Table 13-9**.

**Table 13-9: RAP Management and Administrative Costs**

Item	Total (EGP)
RAP Miscellaneous Implementation Costs (Consultation, Communication, logistics, travel expenses, etc)	2,000,000
External Independent Monitoring Consultant	450,000
External close-out audit	150,000
<b>TOTAL</b>	<b>2,600,000</b>