10 Garment Assembly Workshops – Forsa Program

El Nidaa Foundation

DRAFT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

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Abbreviations

Acronym	Definition	
ESMF	Environmental and Social Management Framework	
ESMP	Environmental Social Management Plan	
E&S	Environmental and Social	
HR	Human Resources	
GBV	Gender Based Violence	
MOSS	The Ministry of Social Solidarity	
MPBS	Ministry of Public Business Sector	
NGO	Non-Governmental Organization	
OHS	Occupational health and safety	
PMT	Proxy Means Testing	
RMG	Ready-made Garments	
ТКР	Takaful and Karama Program	
WB	World Bank	

Executive Summary

	The project development objective is to support the Borrower to establish an efficient and effective Takaful and Karama Cash
STRENGTHENING SOCIAL	Transfer Program and improve access to economic opportunities. The project components are the following:
SAFETY NETS PROJECT	Component 1: Provision of conditional and unconditional cash transfers.
DESCRIPTION	Component 2: Support social safety net targeting and operational systems.
	3. Component 3: Project management and monitoring and evaluation.
	4. Component 4: Economic inclusion/Empowerment Services Pilot.
	Forsa Program, which is under component 4, is one of the Ministry of Social Solidarity' pilot projects. Forsa Program is financing
	piloting of economic inclusion packages to determine which models perform better than others and identify sources of success and
	bottlenecks. The pilot program aims at engaging people who receive Takaful pension into the employment market through pushing
	them towards independence in income generation. An Environmental and Social Framework (ESMF) was prepared for the program
	to provide an environmental and social (E&S) management process and practical tool for the program's sub-projects design, implementation and monitoring to ensure proper consideration and management of E&S aspects. All the Forsa sub-projects are
	subject to screening process to determine the needed E&S management tools.
INTRODUCTION	
INTRODUCTION	In February 2022, the El Nidaa Foundation, a non-governmental organization (NGO) that focuses on women empowerment and job
	creation, signed an agreement with the Ministry of Social Solidarity (MOSS) as part of the Forsa Program. El Nidaa is renting and
	plans to operate existing 10 garment assembly workshops in El-Fayoum governorate "the sub-project". The 10 workshops are located in the Ministry of Public Business Sector (MPBS) complex which has recently undergone rehabilitation to create 14 distinct
	workshops catering to small and medium manufacturers in the clothing sector. The rehabilitation by the MPBS initiative was to
	generate employment opportunities and maximize the utilization of previously underutilized assets.
	The sub-project aims to train and provide sustainable jobs for approximately 3676 female beneficiaries in the specific technical skills
	required for this industry. This Environmental Social Management Plan (ESMP) is prepared in accordance with the Strengthening Social Safety Net Project SMF.
COORE OF THE FOLIA	The main objective of the ESMP is to assess the environmental and social impacts and risks of the operation of the existing 10-
SCOPE OF THE ESMP	garment assembly workshops "the sub-Project" and to propose environmental, social and health and safety mitigation measures to
	those impacts and risks in accordance with the World Bank Operational Policies. The scope of the ESMP includes the installation and
	those impacts and risks in accordance with the world bank operational rollers. The scope of the Estal includes the installation and

				y workshops. The workplace will guarantee all aspects of a decent job such as nursery that will beneficiaries, in addition to social and medical insurance.	
	Climate	Climate	region is charadaily tempera	s semi-arid. The average annual rainfall rate is low, averaging at about 99.6 mm per year. The acterized by hot weather in summer and medium weather in winter, where the highest average ature recorded in August is 35°C and the lowest in January is 7°C. The annual average wind knot/hr; therefore, the average wind speed is considered a bit low which kind of leads to the of air pollutants in the governorate. There is no vulnerability to climate change catastrophes	
		Noise and Air quality	residential, st	f noise in the area is mainly the movement of the vehicles. The surrounding area is mainly corage areas and agriculture. The main source of air pollutants is fugitive emissions form the anticipated that the Noise and Air quality are Within the permissible limits.	
			North	Empty land and a road	
			East	Warehouse	
	NVIRONMENTAL AND	Surroundings West South	West	Empty land and a main road	
	_		South	Empty land	
C		Land		shops are rented from the MPBS in the garment assembly complex. The total area of the ,000 m ² and the total area of the workshops is 15,000 m ² .	
		Biodiversity	There is no er	ndangered flora or fauna spotted around the complex area.	
		Culture heritage	There aren't a	any cultural heritage sites near the complex area.	
		Community health	The complex	is fenced with controlled gates and communities are not authorized to the complex area. The	
		and Safety	closest residential area is located around 2-3 km from the complex.		
		Sensitive Receptors	There aren't complex.	any sensitive receptors near the complex. The closest residential area is 2-3 Km from the	
		Beneficiaries	3676 female	beneficiaries, aged between 18 – 35. As most of the beneficiaries are mothers, it is taken into	
		Characteristics	account to cu	t down the working hours to suit their household duties. They are Takaful beneficiaries and will	

	be graduated once signing the employment contract after 6-	month training period.	
	Applicable Egyptian laws	Applicable WB policies and guidelines for the operation process	
	Law No. 4/1994 and its amendments: Environmental Law	Given the nature of the proposed sub-	
	Law no. 37 of 2008 Institutional arrangements for the Ministry of Environment	projects, the WB Operational Policy 4.01 (Environmental Assessment) is the only	
	Law 202 for 2020 for Waste Management	safeguards policy that is triggered for this project.	
	• Cleanliness law 38/1967 amended by law 31/1976 and its executive regulations	Component 4 supports only category "B" or "C" sub-projects as per the World Bank OP	
	 Labor Law 12/2003 and the Social Insurance and Pensions Law-Decree no. 168/2007 and its amendment no.162/2019, which originally referred to article 	4.01 classifications. Sub-projects classified as category "A" as per OP 4.01 will not be eligible for funding by this component.	
POLICY AND LEGAL	Law 117 of 1983 on the protection of monuments and cultural heritage, amended by Law 12 of 1991	WBG General Environmental, Health, and Safety guideline	
FRAMEWORK	Law No. 10/2018: Law on People with Disabilities	, 0	
	 Presidential Decree No. 50 of 2014, its amendments in 2017; and recent amendment to law 141/2021 carried out in August 2021 amending some articles of the 58/1937 Penal Law, to increase the penalty for sexual harassment, including sexploitation. 	Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works Good Practice Note	
	 As per the ESMF, few gaps have been identified: ESMPs are not usually implemented and if implemented, they are not sufficiently monitored and followed up, in particular during the construction phase. Although the Law clearly indicates that social impacts should be assessed as part of the EIA process, the social impact assessment and social management plan are not thoroughly reviewed during the environmental approval process by EEAA. On hazardous waste, gaps are mainly attributed with the implementation. More details on gap analysis is found: https://documents1.worldbank.org/curated/en/900401542101846979/pdf/EGT-SSNP-168414-ESMF-Final-Engl.pdf 		

	Impact and/or Risk	Impact Significance	
	Air Quality	Low	
	Noise and vibration	Low	
	Water Resources	Low	
	Soil and Land use	Low	
	Solid and hazardous wastes	Low	
ENVIRONMENTAL AND	Impacts on local traffic	Low	
SOCIAL IMPACT ANALYSIS	Health and Safety	Moderate	
ANALYSIS	Socio-Economic impacts	High Positive	
	Child labor	Low	
	Labor influx	Low	
	Biodiversity and Ecological Systems	Low	
	Cultural and Archaeological Heritage	Low	
	Creation of Job opportunities	High Positive	
	Community health and safety	Low	
KEY MITIGATION MEASURES	- Reuse as much as possible of generated waste and recycle the remainder Representation of women in all exercises of sub-project designing, planning, implementation, and monitoring Deploy and conduct training around Codes of Conduct for all the complex employee, especially those involved in training and direct interactions with families Provide beneficiaries with social safety net including social insurance and medical insurance Providing training and refreshers to all the workers on using the machines included safe use of equipment Frequently monitoring of the Occupational Health and Safety of the workers.		

	- Regularly inspect the firefighting system by competent persons and conduct regular drills.
	Chapter 6 of this document include the detailed mitigation measures.
STAKEHOLDER ENGAGEMENT RESULTS	The project has conducted stakeholder engagement activities such as knocking the door and public hearing conferences with ٤٠٠٠ persons. The aim of those activities was to encourage female beneficiaries to participate in the program. During the public hearing the following topics were discussed: economic empowerment, self-employment and work value.
GRIEVANCE MECHANISM	Different channels will be provided in the project to ensure that grievances are well handled within the complex and a mechanism relative to GBV complaints will be made available within the complex in coordination with MOSS. Currently, details about the mechanism are not available and will be provided once finalizing the training period and hiring process. All details will be reported to MOSS once provided. In addition to Forsa grievance channels which are: a) A dedicated hotline 16528 b) Website: www.apa.gov.eg c) WhatsApp number: 01555525444 – 01555516528 d) https://www.facebook.com/shakawa.egypt.mot e) Regular visits to the project.
	f) Resident representatives at the local social units and social EDARA
	g) Resident social workers (RAEDAT REFYAT)

1. Project Description

1.1. Introduction.

The Strengthening Safety Nets Project development objective is to support the Borrower to establish an efficient and effective Takaful and Karama Cash Transfer Program and improve access to economic opportunities. The project components are the following:

Component 1: Provision of Conditional and Unconditional cash transfers (US\$435 million). This component supports the provision of conditional and unconditional CTs to beneficiaries under the Borrower's Takaful and Karama Cash Transfer Program.

Component 2: Support SSN Targeting and Operational Systems (US\$10 million). This component supports enhancing the targeting and operational systems of the Takaful and Karama Cash Transfer Program. Component 2 will also support expanding the Karama Program.

Component 3: Project Management and Monitoring and Evaluation (US\$5 million). This component will support, and finance costs associated with project management and implementation activities.

Component 4: Economic Inclusion/Empowerment Services Pilot (US\$50 million). This component will support the Economic Inclusion and Empowerment Services Pilot, including linking beneficiaries to employment services, provision of training, and asset transfers to beneficiaries. The component will include a range of activities to complement the cash transfer program with improved access to economic opportunities that strengthen income generating capacities and economic resilience. Various productive/economic inclusion models will be piloted by enhancing skills of beneficiaries and linking them to wage or self-employment opportunities. The component addresses the need to test various models of sustainable livelihood tailored to the profile of Takaful and Karama Program (TKP) applicants. Effective economic inclusion programs are expected to assist beneficiaries to reduce long term dependency on cash transfers. Component 4 will target: (a) working age/unemployed and inactive members of TKP beneficiary households, and (b) other working age/inactive and unemployed individuals that fall within the TKP database but were rejected based on their proxy means testing (PMT) score which was right above the poverty threshold cutoff point (with PMT score between 4.5-5.5). Selection of participants will prioritize individuals to achieve targets of 50 percent youth and 30 percent women.

FORSA Program, which is under component 4, is one of the Ministry of Social Solidarity' pilot projects. Forsa Program is financing piloting of economic inclusion packages to determine which models perform better than others and identify sources of success and bottlenecks. The pilot program aims at engaging people who receive Takaful pension into the employment market through pushing them towards independence in income generation. In February 2022, the El Nidaa Foundation, a Non-Governmental Organization (NGO) that focuses on women empowerment and job creation, signed an agreement with the Ministry of Social Solidarity (MOSS) as part of the Forsa Program. El Nidaa is renting and plan to operate the 10 garment assembly workshops in El-Fayoum governorate "the sub-project". The 10 workshops are located in the Ministry of Public Business Sector (MPBS) complex which has recently undergone rehabilitation to create 14 distinct workshops catering to small and medium manufacturers in the clothing sector. The rehabilitation initiative was to generate employment opportunities and maximize the utilization of previously underutilized assets. All the Forsa sub-projects are subject to screening process to determine the needed E&S management tools.

Table 1: Introduction: general information

Name of the project	Strengthening Safety Nets Project
Name of the Sub-project	10 Garment Assembly Workshops – Forsa Program
Sub-projects Location	Al Fayoum
Sector and Type of Subproject	Garment Assembly
Implementing of the Subproject	El Nidaa Foundation
Estimated Cost of Sub-projects	EGP 58,999,000

In this regard, the project hopes to participate at reducing the prevalence of GBV: 1) by reducing poverty and food insecurity; 2) by empowering women; and 3) by increasing women's social capital through participation in project activities.

1.2. Scope of the ESMP

This Environmental and Social Management Plan (ESMP) is prepared in accordance with the Strengthening Social Safety Net Project Environmental and Social Management Framework (ESMF). The screening of the sub-project determined the need for an ESMP for this sub-project. The main objective of the ESMP is to assess the environmental and social impacts and risks of the operation of the 10-garment assembly workshops "the sub-Project" and to propose environmental, social and health and safety mitigation measures to those impacts and risks in accordance with the World Bank Operational Policies. The scope of the ESMP includes the installation and operation of the 10 garment assembly workshops. The workplace will guarantee all aspects of a decent job such as nursery that will be available to receive the kids of the beneficiaries, in addition to social and medical insurance.

1.3. Garment Assembly Workshops in MPBS complex

The MPBS complex is located on the outskirts of Al Faiyum city in Al Faiyum Governorate as shown in the flowing maps.

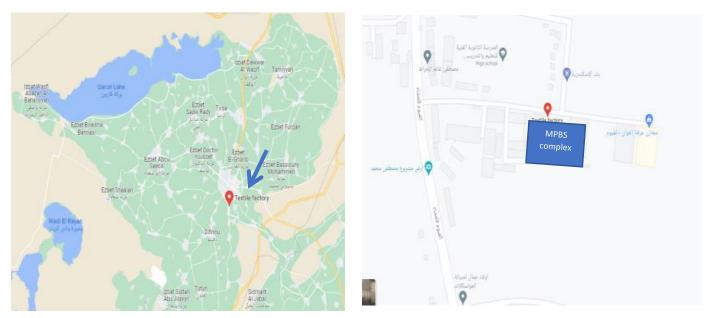


Figure 1: Maps with Location of the Complex

The complex is fenced with controlled gates and only authorized persons are allowed access. The complex layout of the 14 workshops and typical layout for a workshop are presented in Annex 1.

The complex has an administrative building, where the nursery is located, a parking space and a private vocational factory/school for woman. The 10 workshops will be operated under the name of El Nidaa Foundation. El Nidaa will be responsible for procuring and installing the machines needed for these workshops, as well as managing them. In the meanwhile, the MPBS is providing access to Al Nidaa to the other 4 workshops for training of the beneficiaries. The 4 MPBS workshops are currently equipped with 120 new sewing machines that are used for training of the beneficiaries (see picture below). MPBS also is planning to rent the 4 workshops to private sector. El Nidaa will also have the responsibility of contracting with the private sector for two main purposes. Firstly, they will contract with the private sector to provide the materials needed for production, as well as the designs and specifications of the products. Secondly, they will contract with the private sector to buy and market the products produced by the workshops.

Each workshop is about 1300 m^2 and can accommodate about 350 beneficiaries. The total number of beneficiaries is expected to be 3676 women, between the age of 18-35 years old, who live in Faiyum. They are all Takaful beneficiaries and will be graduated once signing the employment contract after 6-month training period. The beneficiaries will be shareholders in the machines to be provided and high-achieving beneficiaries will be selected by Al Nidaa to join the management team of the workshops, as per the signed protocol between MoSS, MPBS and Al Nidaa.





Figure 2 One of the workshops in the MPBS complex

The complex is designed on one floor and ramps will be provided to access the workshops. Each of the workshops, has renovated gender separated sanitation facilities, drinking water facilities, electrical power system, firefighting system and efficient lighting system. Moreover, there is a renovated and upgraded nursery that can take about 100-120 kids in about 4 classes. The nursery has also one administration room, an outdoor area that will be upgraded to be a garden, sanitation facilities and a kitchenette. The following figures are showing some of the facilities in the complex.



Figure 3: Classroom in Nursery



Figure 4: Outdoors area of nursery that still needs to be rehabilitated









Figure 5: Washrooms in the workshops



Figure 6: Satellite View of the complex

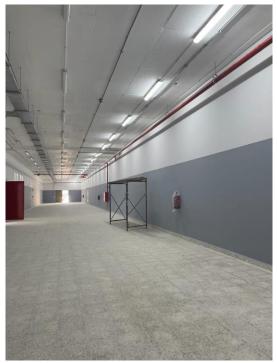


Figure 7: Empty workshop equipped with firefighting system and fire extinguisher.

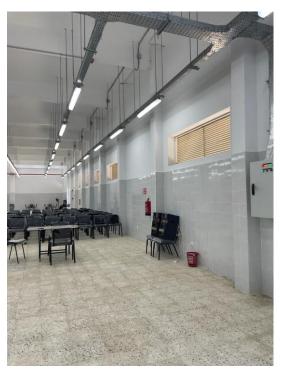


Figure 8: Workshop used for training purposes





Figure 9: MPBS workshop used for training equipped with pressing machine (left picture) and swinging machines (right picture).

Legal Status of the complex

The complex has an operation license for production of ready-made garment and has an approval from the Industrial Development Agency (IDA) which include civil department approval of the firefighting system and IDA environmental approval.

Planned Activities

The processes in each of the 10 garment assembly workshops will be identical. The activities do not include any yarn production, textile or laundry services. The steps for the manufacture of clothing are cutting the fabric to size and sewing it into the final product, then iron it and package it.

The equipment and machines to be used for production include sewing patterns, office supplies, scissors, sewing machines, and packaging materials. These tools will be utilized in the manufacturing process of various clothing items such as Polo shirts, uniforms, underwear, home wear, sweatshirts, and sweatpants. It is important to note that the design and specifications of the products will be determined by the private sector, which will also provide the materials and specific requirements for the end product.

As mentioned above, each workshop will accommodate 350 beneficiaries. Working hours will be from 8:30 am to 3:30 pm and one hour coffee break (this is only applied to the peak production period). As most of the beneficiaries are mothers, it is taken into account to cut down the working hours to suit their household duties. And the nursey is made available for mothers with children.

Each beneficiary will be trained to use the machines and tools that they will be using. The beneficiary will receive a salary, social and medical insurance and a bonus once the workshop start selling. The beneficiaries are shareholders in the machines of the workshop and in cases of ending contract, the beneficiary will take the equivalent value of the share in cash.

Steps of the Production Process

- 1) Cutting the fabric to the sewing pattern provided by private sector.
 - Cutting will be manual using scissors.
- 2) Sewing the end product, through different stations. Each station does the same activity (e.g., the neck of the shirt, the sleeve, etc.).
 - Using typical swing machines as provided in the pictures above.
- 3) Pressing (ironing).
 - Using an iron to press to ensure neat finish.
- 4) Finishing adding any final finish i.e., buttons, zippers, labels, etc.
- 5) Quality assurance
 - Visual inspection of the product
- 6) Manual Packaging as per the private sector requirements and provided material, and since this is the only way the ready-made garments are packed. This activity is also suitable for those who lack the technical skills or can't work for long hours.

As shown in the layout, each workshop is provided with storage areas for material and end products.

2. Legal Framework

The project will comply with both Egyptian laws and the World Bank Safeguards Operational Policies. This section will list the applicable national laws and WB requirements. More details on the legal framework, which includes a gap analysis, can be found in the ESMF prepared for the project, as part of the Chapter two – Legal and institutional Framework: https://documents1.worldbank.org/curated/en/900401542101846979/pdf/EGT-SSNP-168414-ESMF-Final-Engl.pdf

2.1. National requirements

Table below summarizes the national legal provisions applicable to the proposed project.

Case	Relevant Law and legislation	Articles applicable to the project	
Pollution of the environment	Law No. 4/1994 (Environmental Law) Amended by Law No. 9 of 2009	Articles 19, 20, 21, 23, and 33 regarding the performance of environmental impact assessment Articles 22 and 23 regarding the follow-up of the environmental register	
Hazardous waste management	Law No. 4/1994 (Environmental Law) Amended by Law No. 9 of 2009	Articles 29 and 30 regarding hazardous material and waste handling and management	
Waste management	Law 202 for 2020	Articles 15, 16, 20, 31, 33, 34, 38 for municipal waste and articles 58, 60 & 61 for hazardous waste.	
Law 38/1967 (Public Cleanliness Law)	Cleanliness law 38/1967 amended by law 31/1976 and its executive regulations		
Air pollution	Law No. 4/1994 (Environmental Law) Amended by Law No. 9 of 2009	Substances 34 to 39, 42, 43 and 47 bis of the project site, emissions or leaks of air pollutants, use of engines, dumping or burning of refuse, waste and exhaust of drilling and construction works, noise and internal air quality in order	
Occupational Health and Safety	Law No. 4/1994 (Environmental Law) Amended by Law No. 9 of 2009	Articles 42, 43, 44, 45, 46 on noise, indoor air quality, temperature and humidity, ventilation and smoking.	
Labor Law	Law No. 137 of 1981 (Labor Law) amended by Decree 12 of 2003		
	Labor Law and the Social Insurance and Pensions Law-Decree no. 168/2007 and its amendment no.162/2019, which originally referred to article No.26 of Labor Law 12 of the year 2003		
Gender Based Violence	Presidential Decree No. 50 of 2014, its amendments in 2017; and recent amendment to law 141/2021 carried out in August 2021 amending some articles of the 58/1937 Penal Law, to increase the penalty for sexual harassment, including exploitation.		
(GBV)	Article 306 (a, b) of the Penal low 20 or physical.	18 provides the punishment for harassment, whether verbal	

Case	Relevant Law and legislation	Articles applicable to the project
Law on People with Disabilities	Law No. 10/2018	
	Law 4/1994 on Environmental Protection	Paragraph 6.4.3.1
Public Consultation	EEAA guidelines related to the Public Consultation	Paragraph 6.4.3.2 Paragraph 6.4.3.3 Paragraph 7

2.2. World Bank E&S requirements

As per the ESMF, the World Bank (WB) has identified 10 environmental and social safeguard policies that should be taken into consideration in its financed projects. The objective of these policies is to prevent and mitigate undue harm to people and their environment during the development process. The ESMF was prepared guided by the following WB Operational Policies:

- Given the nature of the proposed sub-projects, the WB Operational Policy 4.01 (Environmental Assessment) is the only safeguards policy that is triggered for this project.
- Sub-projects will be screened, categorized, and managed in accordance with OP 4.01.
- Component 4 supports only category "B" or "C" sub-projects as per the World Bank OP 4.01 classifications. Sub-projects classified as category "A" as per OP 4.01 will not be eligible for funding by this component.
- Sub-projects which trigger World Bank OPs other than 4.01- specifically 4.12 (Involuntary Resettlement), OP 7.50 (Projects on International Waterways), OP 4.04 (Natural Habitats), or OP 4.09 (Pest Management) will not be eligible for funding by the pilot component on economic inclusion (component 4).

3. Environmental and Social Baseline conditions.

Environment al and Social Baseline Elements	Description		
Project Location	The MPBS complex shown in the above	c is located on the outskirts of Al Faiyum city in Al Faiyum Governorate as e maps.	
Project	North	Empty land and a road.	
Surroundings	East	A warehouse for cloth.	
	West	Empty land and a main road.	
	South	Empty land.	
	Workshops	While the complex has 14 workshops, only 10 workshops will be used for now and thus, are included in scope of this ESMP. Each workshop is around 1300 square meter.	
	Sanitary conveniences	Separate conveniences for men and women. Each workshop has one facility for female and one facility for male. Each facility has two units.	
	Sanitation	The complex is connected to the public sanitation networks	
	Drinking water outlets	The complex is connected to the public drinking water networks	
	Firefighting system	Firefighting system in compliance with the national and international standards. Each workshop has 4 to 6 units and those are located next to the emergency exits which are 4 exits per workshop. The system is certified by the local authorities.	
Factories data	Nursery	Standalone building with separated access with 4 classrooms. Each classroom accommodates about 25 to 30 children. Minimum 7 staff members will be hired. There is also one administration room, an outdoor area that will be renovated, sanitation facilities and a kitchenette. 07 facilitators will operate the Nursery and will secure all the needed permits from the relevant Ministries, and a nursery manager will be hired and responsible for the operation.	
	Storage area	Two storage areas are attached to each workshop with a size of 150 – 250 square meters.	
	Electrical power system	Basic and primary electrical system that was designed and built in the complex before.	
	Lighting	Complex is well-lit; there are no areas without lighting. No evening activities will be conducted.	
	Accessibility	The complex is all designed on one floor including the nursery with no steps. Ramps will be provided to access the workshops. Ramps can be used by any wheel chaired workers or visitors even for the first floor.	

Environment al and Social Baseline Elements	Description		
		Ramps will be provided in the toilets.	
	Cleanliness	Housekeepers will be employed.	
	Entrance/Exist of the complex	The complex main entrance is on the main road. Then there is directly the complex on the left and further on the right there is the administrative building.	
	Cafeteria/Rest areas	There is a temporary rest area for now, and there are plans, once expansion of functioning workshops takes place to have a cafeteria to serve the factory.	
	Maintenance works	A maintenance technician has been hired for regular daily maintenance.	
	Ventilation system	Ventilation is done through high seal windows and ventilation fans are already installed. Despite that the workshops are equipped with room for central Aire Conditioners (ACs). ACs are not installed, as they will require more power supply and will increase the operating cost. The ventilation will be sufficient as per the national requirements.	
Environment al Baseline	Noise and Air quality	The source of noise in the area is mainly the movement of the vehicles. The surrounding area is mainly residential, storage areas and agriculture. The main source of air pollutants is fugitive emissions form the vehicles. It is anticipated that the Noise and Air quality are Within the permissible limits.	
	Climate	The Climate is semi-arid. The average annual rainfall rate is low, averaging at about 99.6 mm per year. The region is characterized by hot weather in summer and medium in winter, where the highest average daily temperature recorded in August is 35°C and the lowest in January is 7°C. The annual average wind speed is 4.2 knot/hr; therefore, the average wind speed is considered a bit low which kind of leads to the accumulation of air pollutants in the governorate.	
	Land	The works will be within the complex premises. No additional land for the work is needed	
	Biodiversity	No protected areas or endangered species (there is no critical or high biodiversity values that might be affected) in the vicinity of the site.	
	Culture heritage	The sites adjacent areas do not include any historical or cultural sites	
	Receptors	The closest residential area is about 2-3 km from the complex.	
	Community health and Safety	The complex is fenced with controlled gates and communities are not authorized to the complex area. The closest residential area is located around 2-3 km from the complex.	

4. Environmental and Social Impacts Assessment:

Positive Impacts:

- Economic empowerment and financial independency;
- Acquire new vocational skills;
- Profit sharing;
- Awareness raising activities (see Annex 3.);
- Social services such as nursery at the workplace;
- Acquire interpersonal skills and new social skills;
- Improvement of labor participation and employability skills;
- Creation of employment opportunities for both skilled and unskilled labor;
- Creation of gender friendly and responsive learning environments;
- Narrow the gender gap in employment and work opportunities and contribute to women's employment;
- Help narrow geographic disparities by targeting nationwide poorest villages and districts;
- Improvement in the standard of living of those who were adversely affected by the economic deterioration and contribute to shared prosperity in Egypt and;
- Enhance the productivity of the local economy.

Identified Impacts during Installation and Operation are provided in the below table:

Impact/Risk	Definition
	Waste is expected be generated from different sources in the complex including:
Land and air	1- Municipal waste (generated from daily activities, rest areas and offices)
Pollution	2- Fly particles generated from cutting and working of material.
resulting from	3- Packaging waste
waste	4- Cuts of fabric which should be recycled
mismanagement	Wastewater will be discharged directly using the existing system.
	Noting that No chemicals at all will be used for the workshop processes.
Gender based	There may be incidents of sexual harassment from project workers towards female
violence (GBV)	beneficiaries. Moreover, cases of sexual exploitation of workers, especially in case
, ,	there are any female workers are also possible.
	Child labor is the exploitation of children who are deprived of their childhood by
	work that prevents them from attending school or causes physical, mental, or social harm.
Child labor	Egyptian Child Law No. 12 of 1996, as amended by Law 126 of 2008, stipulates in
	part 5-chapter 1 certain restrictions and conditions of child labour. Article 64
	prohibits employing children before their 15th birthday and restricts participating in
	training before the age of 13.
	Occupational safety and health hazards associated with installation of the
Occupational	equipment and during operations that could result in injuries. Hazards include
Health and safety	exposure to dust or fly associated with cutting, physical hazards during installation,
	moving of equipment and vehicles maneuvering in the complex, noise exposure,
	Musculoskeletal disorders (MSDs).
Labor and	Workers may be expected to work overtime, may not be aware of their

Impact/Risk	Definition
working conditions	salaries/compensation, there may be discrimination between workers, lack of insurance coverage of all types of workers. Solid Human Resources system that follows the national legal policies will be applied including the internal and Forsa grievance mechanisms.
Fire risks	In production areas with relatively high temperatures generated by machinery and the presence of flammable materials and dust, represents a fire hazard.

5. Environmental and Social Impact Analysis Plan and Mitigation Measures:

This section includes a detailed analysis of the proposed mitigation and monitoring measures for the identified environmental and social impacts.

Installation and Operation Environmental and Social Management and Monitoring plan:

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	 Reuse as much as possible of generated waste and recycle the remainder. Unrecyclable fabric will be sold 	The Project Manager				
Waste Impacts	 Minimize waste generation on site. Municipal waste must be collected and transported to local council approved disposal sites. Waste containers must be located at each worksite. Hazardous material if any and waste should be appropriately labeled, stored for safe transport to an approved treatment of disposal facility Allocate and prepare areas for temporary storage of cuttings. Ensure good housekeeping 	Safety committee that will be formed once the industrial area is being operated.	Register the quantities of reused, recycled waste and municipal waste. keep chain of custody documents for waste till disposal	 Quantities of reused waste Quantities of recycled waste 	Storekeeper/Monthly	No cost

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	practices - Maintain records on waste types and quantities - Observe any waste accumulation in unapproved locations - Waste management contracts with authorized contractors - Waste delivery receipts from local authorities.					
GBV	 Representation of women in all exercises of sub-project designing, planning, implementation, and monitoring. Deploy and conduct training around Codes of Conduct for all the complex employee, especially those involved in training and direct interactions with families. Disseminate the Code of Conduct in the 10 workshops Inform beneficiaries about Code of Conduct and share with them grievance channels in case of complaints. 	The Project Manager	 Register the number of complaints received. Register number of Codes of Conduct signed and trained on Register participator y activities conducted with women. 	 Number of GBV related complaints. Number of women employed in the complex and joining the decision-making bodies and steering committees. Number of trainings conducted tackling the code of conduct and gender issues. Number of Codes of Conduct signed. Number of participatory 	Project management, project monitoring and evaluation team or external audit. Monthly and annual.	No cost

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	- Grievance mechanism: in case women opt to submit complaints internally, the Human resources department will receive the grievance and ensure confidentiality and survivorcentered approach. As needed, complainant will be referred to MOSS Women's Department hotline, which will be disseminated for this purpose. Channels and procedures listed in the grievance section. - Collecting gender disaggregated monitoring and evaluation data to track the extent to which women have been able to participate and benefit from project activities, that in case males joined the project in any phase. - Conducting gender-sensitive and participatory consultations while finalizing and designing the various sub-project activities such as the selection of niche products, training activities, and capacity building initiatives. These have to			conducted addressing and involving women.		

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	include safe spaces/ women-only focus groups to encourage women's meaningful participation in consultations. - Create female only spaces for women to receive trainings and services					
Child Labor	Strictly enforce the national law Contractual obligations for all Forsa partners and beneficiaries prohibit all forms of child labor.	Project manager and Human Resources team	- Review all labor contracts - Field inspections - Review complaints or grievances raised with regard to child labor	- Employment contracts Official identity documents.	Project manager and Human Resources team/monthly	No cost
OHS impacts such as Physical hazard from equipment or vehicles	-Assign adequate number of competent OHS personal to supervise the works and ensure safety of all workers. The number of OHS personal will be proportionate to the activities and the number of workersAssign a number of nurses or doctors to serve the 10 workshops in cases of emergency as required by the national law -Allocate a room in the building to be a clinic and equip it for adequate emergency response.	Project manager, supervisors, and OHS personnel	- Field inspection reports - Review complaints or grievances raised about OHS aspects and time it took to resolve them - availability of OHS Plan -presence of adequate number	 training records contracts for OHS personnel, nurses, etc Number of safety inductions conducted. Availability of Personal protective equipment. 	Project manager, supervisors, and OHS personnel /daily and monthly	Part of the operation cost as required by the national laws

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	-Prepare an OHS plan for the workshops and an emergency response planConduct frequent drills for the workersNo smoking is allowed inside and allowed only outside in adequately secured areasTrain workers for safe usage of tools and equipment and PPE and emergency response -Train workers on preventing Musculoskeletal Disorders and Repetitive Strain Injuries -Provide adequate PPEs for the workers Ensure proper ventilation in the workshops to meet the national requirements for workplaces.		of competent OHS personnels and well-equipped clinic - Training sessions conducted			
Labor working conditions	 Provide contract for the workers Social including social insurance, medical insurance and as shareholders they will receive a profit share and not pensions. Professional and vocational trainings. Ensure proper ventilation of the workshops 	Project manager and Human Resources team	- Review all labor contracts - Field inspections - Review complaints or grievances raised with regard labor and working conditions	- Employment contracts Number of trainings and awareness sessions conducted and topics discussed governmental permits for nursery obtained	Project manager and Human Resources team/monthly	No cost

Identified Impact	Mitigation Measure	Responsibility	Monitoring Activities	Monitoring Indicators	Responsibility /Frequency	Estimated Cost
	- Obtain all necessary governmental permits to operate the nursery -Raise awareness of the beneficiaries about their rights and duties.					
Fire risks	- Inspect the installed fire system including fire extinguishers the complex on frequent basis to ensure placement of fire extinguishers in storage areas and waste collection areas - Train workers on using fire extinguishers and emergency response - Conduct frequent drills to ensure awareness of the workers	Ministry of business public sector	Physical check	Will be checked based on the authorities' indicators	responsible authorities a (civil authorities)	No cost

6. Stakeholder Engagement Activities

6.1. Consultation Methodology

The consultation activities to attract Takaful female beneficiaries in Faiyum have started in 2022 and will be continued to cover more villages based on the database provided by the MOSS. The aim of the activities was to inform the community members regarding the project and the benefits of joining the project.

Table 2: Summary of the consultation activities that were conducted in project area

Stakeholders	Nu	ımber	Method	Topics discussed
	Males	Females		
Sample for the Baseline study from 4 villages in Fayoum	0	107	Stratified Sample (Door-knocking)	Self-employment, economic and social
Focus Group Discussion with women in Tameya village	0	15	Focus Group Discussion	empowerment.
Focus Group Discussion with women in Bihmo village	0	30	Focus Group Discussion	

6.2. Consultation findings

Findings of the initial activities conducted with about 4000 beneficiaries included to better understand the preference of women, the latter who would be interested in participating in the FORSA program seemed to be interested in sewing related activities. Further engagement activities were conducted by Al Nidaa Foundation, demonstrated that most women expressed willingness to participate in the program because it gives them a stable income and makes them active members of the society. Women were also attracted by having a profit share. Women were glad to learn a new skill and have a self-income.

6.3. Grievance Mechanism

6.3.1. Grievance Channels

Different channels will be provided in the project to ensure that grievances are well handled within the complex and a mechanism relative to GBV complaints will be made available within the complex in coordination with MOSS. Currently, details about the mechanism are not available and will be provided once finalizing the training period and hiring process. All details will be reported to MOSS once provided.

Proposed Complex Internal Grievance Channels:

- a) A dedicated email address;
- b) A dedicated phone line;
- c) Focal point from the Human Resources team dedicated for this mission.
- d) Feedback/complaint boxes located at project sites
- e) Verbal or written complaints to project staff directly or through periodic project meetings which will include the project beneficiaries. If project stakeholders provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels with consideration for requests for confidentiality to the best degree possible.
- All the aforementioned information will be included in complaint posters that will be distributed in visible different places in the complex. In addition, the mechanism and channels will be introduced in the induction sessions and periodic project meetings.

FORSA GRM Grievance Mechanism:

- a) A dedicated hotline 16528
- b) Website: www.apa.gov.eg
- c) WhatsApp number: 01555525444 01555516528
- d) http://www.facebook.com/shakawa.egypt.mot
- e) Regular visits to the project.
- f) Resident representatives at the local social units and social EDARA
- 6.3.2. Resident social workers (RAEDAT REFYAT) Grievance Cycle

Project- level grievances will follow the following cycle. Complainants have the full right to submit their grievance to any of the project-level as well as institutional level channels.

6.3.2.1. Grievances' Tiers Composition

A grievance or complaint can be submitted by a natural person or group of persons or community who has/have been or who may be affected by adverse impacts of the project.

Regarding the Complex Internal Grievance:

The HR focal point will receive all comments and complaints associated with the project received from various stakeholders (project beneficiaries and community members). Comments and complaints can be

submitted via email, cell phone or in-person. The comments and complaints will be summarized and listed in a complaint register (see Annex 2), containing the name/group of commenter/complainant, date the complaint was received, brief description of issues, information on proposed corrective actions to be implemented (if appropriate) and the date of response sent to the commenter/complainant.

The HR focal point is the owner of the procedure. The HR focal point will review the assessment of incoming grievances/ inquiries and suggestions and allocation of action, ensuring the closeout of open grievances, escalating severe grievances to the management as required, ensuring that everyone is aware of existing procedures, coordinating reviews/revisions of this procedure. If the complaint cannot be resolved at this level within 21 working days, it is taken to the next level and accelerated to El Nidaa Management. The complaint could be accelerated to Forsa program as well depending on its nature, scope and the ability of El Nidaa team to solve it.

Regarding FORSA GRM Grievance Mechanism:

Complainants can also choose to submit complaints via the FORSA grievance mechanism. It is expected that most complaints from the beneficiaries of the complex will be submitted to the complex internal grievance unless there is a need to escalate than thy will directly submit to the FORSA grievance mechanism. Moreover, community members will probably be more inclined to use FORSA grievance mechanism. A separate grievance mechanism will be available for GBV that will be tackled by MOSS. The mechanism will include hotline, emails, and an official focal point. Channels will be shared and included once provided.

6.3.2.2. Response to Grievances

All comments and complaints will be responded to either verbally (via cell phone) or in writing or through meetings, following the preferred method of communication specified by the complainant. Acknowledgement response should be shared with complainants with 1-2 days. The grievance should be responded to the aggrieved person within "5 working days" the latest. In case the investigation and solution will take longer time, the focal point shall respond to the complainant to inform her/him that it is taking more time than expected within the 5 working days. The response of grievances should be documented in the compliant feedback register (see Annex 2).

6.3.2.3. Registration of Complaints

- All complaints/grievances received verbally will be register by the HR focal point on behalf of the complainant.
- All complaints/grievance will be registered in the complaint register (Please see Annex 2).
- Conduct investigation and inspections by the HR team member who is the focal point of this mission
 to gather accurate detailed information regarding the complaint in order to verify and confirm the
 authenticity and eligibility of the reported grievance. The inspection could include interviews with
 different parties involved, with considerations of confidentiality and sensitivity to other cultural
 contexts and norms, ensuring that the complainant will not be subject to any retaliation.
- Conduct meetings with the responsible department or persons to provide the most efficient corrective actions and solutions.

- Record the complaints and all related information in addition to the corrective action taken by the complex management in the monthly complaint register (Annex 2).
- Consulting and/or referring cases to MOSS FORSA team, as needed.
- Complainants can submit their cases to the courts, if necessary.
- Referring cases to a third party, if needed depending on the nature of the complaints.
- Track, and evaluate the process and results and record all details in the complaints register.
- Send the monthly and the annual complaint register to the focal point of MOSS.

6.3.2.4. Confidentiality

Individuals who submit their comments or grievances have the right to request that their name be kept confidential, though this may mean that the complex management is unable to provide feedback on how the grievance is to be addressed. Yet, as applicable, necessary corrective measures will be considered.

6.3.2.5. Monitoring of Grievances

Regular Reporting:

The monthly report will indicate the status of complaints according to the following categories:

- Opened: complaint/suggestion under examination and the solution has not been communicated to the aggrieved person yet;
- Closed: complaints/grievances that were responded to the aggrieved person in a satisfactory manner and corrective actions have been implemented.
- In progress: complaints were investigated and found valid. Yet, resolution has not been finalized and the aggrieved person did not receive the last closure response.

Beneficiaries and community complaints/grievances will be tracked. Numbers of complaints and outcomes will be registered and reported in monthly reports to MOSS team, as indicators. The Complaints Register will be used to analyze complaints about frequency and common themes/categories of complaints received. On an annual basis, a Beneficiaries Feedback Report (removing commercially and personally sensitive information) will be developed to summarize the status of grievances/ suggestions and inquiries. All Reports will be submitted to MOSS.

6.3.2.6. Disclosure of grievances channels

The beneficiaries and community people will be fully informed about the grievance procedures in simple language. This will be done through conducting meetings or induction sessions with all beneficiaries or community people in the vicinity of project and installing signage at the entrance and different places of the complex. Information about grievance mechanism will be tailored according to the beneficiaries and community. Community leaders, social entities (if found) and the governmental units will be informed about the mechanism through individual meetings and group discussions.

All complaints will be treated as confidential. The focal point will not disclose any personal data that may reveal the identity of complainants without their consent.

Sensitive GBV Grievance Channels:

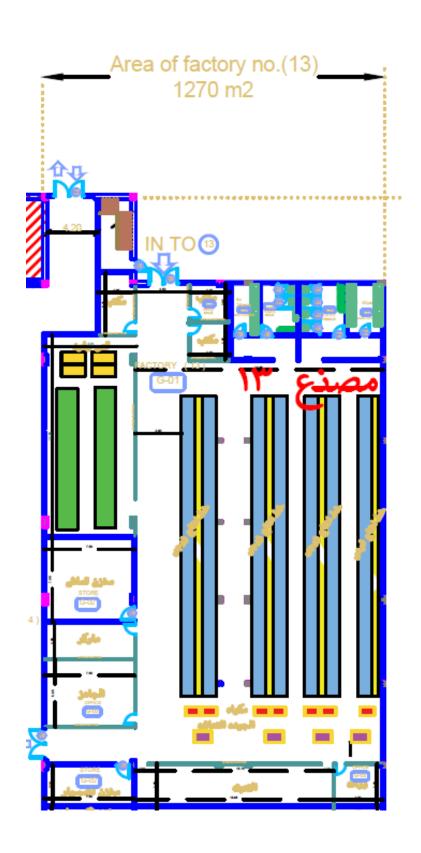
GBV will be addressed to the Women's Department of the Ministry of Social Solidarity through the following channels:

Hotline Number: 16439

The MOSS shall decide the appropriate procedure for dealing with complaints and will coordinate with the complex management regarding the corrective measures to be taken.

Annex 1 Layout of the complex and workshop









نموذج الطلب / الشكوى برنامج فرصة

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دة الأداء في مل	الإنتزام في العمل	طلب معلومات	التسجيل تلبرنامج	دعم فني	چودة المواد الخام والمعدات	الشويق			التعامل
التعرش	التمييز (بناءا على السن أو النوع او الخلقية الإجتماعية أو الدين أو العرق)	تضارب العصلح	الأثر البيني	الأثر الصحي	الأثر الجثماعي	سلوك موظفي البرنامج	الخرى		
	تعوذج تقديم الشكوى مواطن			تمردُج ته	ديم شکو ي من جمه	پة		ج تقديم شكوي من ا	شركة
	الثنكوي ثكوي (في حالة آنه مستفيد من تكافل 14 رقم		النحافظة-		بنى: ز/قسم اتشيا اعى الإدار		- اسم - رقم - الغز المحافظه القرية مديرية التضاء الاجتماعية	ن الاجتماعي الوحدة الإجتماعية	الإدارة
	امي يقرأ ويكتب ابتد ية ثانوي جامعي فوق الجا				ارقام التواصل)		د رقم الافادات	يطاقة (ارقام التوات	ال)
	سِين : كز/ قسم الشهلخه القرية ماعن الإدارة الاجتماعية					العنداء	on the state of th	A triangle of the second of th	

Annex 3 – Grievance log

									17.				Closed In progress Open Yalid Invalid
· MO.	4 Jate	Site	Affected Person	Summary of Comments	Type of issue	Category	Photos	Yalidity •	Status	Comments Receiver	The way of receiving eomments	Responsible Entity	Corrective Action
-													
2	П												
•	П												
4	П												
0	П												
•	\Box												

Annex 4 – Trainings and Awareness raising activities.

All 150 current female beneficiaries have participated in the below activities. Main topics include occupational health and safety, communication skills, healthy eating habits, women's role in the community and how to handle their children's problems, problem solving, emergency response in case of fire, number of women empowerment related topics, family planning, breast cancer prevention, positive parenting.

عنوان الندوه	اسم المحاضر	التاريخ	الرقم
ندوه عن السلامه والصحه المهنيه شامله لكل عوامل الامن للعامل		Y.YW/7/19	١
ندوه عن الاسعافات الاوليه والامن والسلامه والصحه والتغذيه	مدرب اسعافات اوليه وصحه انجابيه بجمعية الهلال الاحمر وشبكه الاقران	Y.YW/V/1Y	۲
ندوه عن (عناصر الاتصال الفعال ومراحل تكوين فريق العمل) وتم تقسيم الحضور الى ٨ مجموعات تفاعليه وقاموا بعمل انشطه تمثيليه تطبيقا للمحتوى العلمي المقدم من قبل المدريين	ليسانس اداب لغه انجليزيه وسكرتير عام جمعيه رواد صناع الحياه ومسئول التدريب سابقا للجنه التدريب والتطوير	Y.YY/V/1Y	٣
	رئيس مكافحه العدوى بمستشفى ابشواي ومدير الموارد البشريه بجمعيه رواد صناع الحياه		
	مسئول ميديا بجمعيه رواد صناع الحياه		
ندوه عن التغذيه الصحيه والتنبيه عن خطوره الامراض الناتجه عن سوء التغذيه مثل الضغط والسكر وسرطان التولون والاعتلال الكلوي	من مديرية الصحه اداره تنظيم الاسره	Y.YW/V/17	٤
ندوه عن اهميه تعليم المراه لاكمال دورها فالمجتمع وكيفيه التعامل مع الطفل وحل مشكلاته	ماجستير صحه نفسيه وارشاد نفسي واسري ومحاضره من المعهد البريطاني	Y.YW/V/1A	٥
ندوه عن اداره حل الازمات والمخاطر وكيفيه حل تلك المخاطر والمشكلات وقام ا/اسلام يونس بالقاء بعض الاناشيد الدينيه عن المديح النبوي	محاضر بالمعهد البريطاني ومسئول نم معلومات بوزاره الاوقاف منشد ومدرب علم المقامات وحاصل علي المركز الاول على مستوى الجامعات المصريه في الانشاد الديني	Y.YW/V/19	٦

ندوه عن (وقايه الانسان وبيئه العمل من المخاطر) وتتحدث عن كيفيه حمايه المنازل من الحرائق وتوفير وسائل الامان للاولاد وكيفيه تطبيق خطه اخلاء وهمي للمتدربات وتعليمهم كيفيه استخدام طفايه الحريق	مدرب حمايه مدنيه والسلامه	Y.YY/V/YY	V
ندوه بعنوان اهميه العمل للمراه ومساهمته في تربيه اولادها تربيه ناجحه	ماجستير صحه نفسيه وارشاد نفسي واسري ومحاضره من المعهد البريطاني	Y.YW/Y0	٨
ندوه عن دور المرأه في الاشغال وكيفيه التسويق واستغلال المهارات المدفونه واستغلال وقت الفلااغ في تعلم صناعه لمقاومه الغلاء ومعاونه الاسره	مدير جمعيه ام المؤمنين	Y.YW/V/Y7	٩
ندوه عن التربيه الايجابيه والاهتمام بصحه المراه والتغذيه السليمه ومكونات الوجبه الصحيه ايضا حضر فريق من مبادره ١٠٠ يوم صحه لفحص السيدات من السكر والضغط والاعتلال الكلوي وتوفير وسائل تنظيم الاسره بالمجان	من مديرية الصحه اداره تنظيم الاسره المسؤل الاعلامي للمديريه	Y.YW/V/YV	1.
	مسئوله اعلام بالتربيه السكانيه في اداره مركز الفيوم		
	ممرضه/اسماء نور الدين من فريق مبادره ١٠٠ يوم صحه		
اجتماع مع المستفيدات لمناقشه ماتم الاستفاده منه خلال الفتره السابقه وتم اخذ ارائهم بالنسبه للموضوعات التي يريدوا التحدث فيها (تطوير الذات –وكيفيه تحمل المسؤليه – وطريقه التعامل مع الاخرين)	<u>ا</u> مدير مصنع الغزل والنسيج	Y.YW/V/Y9	11
ندوه عن كيفيه الوقايه من السرطان والكشف المبكر عن اورام الثدي للسيدات وطرق العلاج	المدير التنفيذي لمركز الاورام	Y.YW/V/W.	١٢
ندوه عن وسائل تنظيم الاسره وتعريف الفتيات كيفيه النظافه الشخصيه والتعرف علي الاكل الصحي وكيفيه العلاج من الانيميا وعمل التحاليل اللازمه لها والرد على تساؤلات المستفيدات	من مديرية الصحه اداره تنظيم الاسره	Y.YW/V/W1	١٣