

**MEMORANDUM TO THE EXECUTIVE DIRECTORS  
INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT**

**Request for Inspection**

**Egypt, Arab Republic of: Upper Egypt Local Development Program-for-Results (P157395)**

**Notice of Non-Registration**

**Summary**

1. On January 8, 2019, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) of the Upper Egypt Local Development Program-for-Results (P157395) (the “Program”) in Egypt. The Request was submitted by a member of the affected community with authorization to represent 16 other residents (the “Requesters”) of the Gerga district in the Sohag governorate in Egypt. The Requesters asked the Panel to keep their identities confidential.
2. The Requesters claimed that a subproject of the Program was expected to cover 200 meters of an open canal passing through their community. They alleged that only 110 meters of the canal was covered and that the environmental, health and safety impact of the uncovered section was affecting the part of the community where they live.
3. The Panel issued a Notice of Receipt of the Request on its website on January 16, 2019, and informed the Requesters and World Bank Management accordingly.
4. After conducting its due diligence, the Panel is not registering this Request for the reasons set forth below.

**The Program**

5. The Upper Egypt Local Development Program (P157395) was approved on September 29, 2016, for a US\$500 million loan from the International Bank for Reconstruction and Development to the Arab Republic of Egypt. The Program’s closing date is expected to be December 31, 2021.<sup>1</sup>
6. The Program Development Objective is to improve the business environment for private-sector development and strengthen local government capacity for quality infrastructure and service

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<sup>1</sup> Program Appraisal Document on a Proposed Loan in the Amount of \$500 Million to the Arab Republic of Egypt for an Upper Egypt Local Development Program-for-Results, dated August 25, 2016, available at: <http://documents.worldbank.org/curated/en/292181475507142347/pdf/108094-PAD-REVISED-OUO-9-Egypt-UELDPA-PAD-25Aug16-Clean-final-2-08292016.pdf> (the “PAD”).

delivery in select governorates in Upper Egypt.<sup>2</sup> The Program has two subprograms: i) improving business environment and competitiveness; and ii) improving access to quality infrastructure and services.<sup>3</sup> The Program will enable the Sohag and Qena governorates to increase infrastructure and service provision, including in development priority areas such as regional roads, water/sanitation, and electricity.<sup>4</sup> The Requesters' concerns relate to impact from the second subprogram.

7. The Program is designed, implemented and monitored under the Program-for-Results Policy (OP/BP 9.00). The Program was 25 percent disbursed at the time of receipt of the Request.

### **The Request**

8. The Request was submitted by a member of the affected community who was authorized to represent 16 other residents of the Gerga district in the Sohag governorate who asked for confidentiality. The Request is attached to this Notice as Annex 1. The Requesters informed the Panel that they had contacted the Bank's Grievance Redress Service (GRS) on November 26, 2018, but did not receive an adequate response until they submitted the Request to the Panel in January 2019.

9. The Request raised concern about the environmental, health and safety impact of an open canal passing through the Requesters' community. According to the Requesters, infrastructure work was supposed to cover 200 meters of the canal but only 110 meters of the canal was covered. The Requesters claimed that this worsened the risk to the community, and the impact is now concentrated in the open area close to where they reside. (Some live as close as four meters from the canal.) The Requesters added that the open canal is a safety and health risk to the community, particularly to children, as it breeds insects and diseases and has no surrounding safety measures.

10. The Requesters alleged that widespread pollution and the accumulation of garbage and waste, as well as dead animals passing through the canal in the front of their homes, has worsened their living conditions. The Requesters considered that this may ultimately lead to the displacement of the local inhabitants. They further claimed that no information was provided to them concerning changes in the design of the canal cover.

11. The Requesters asked the Panel to help ensure that the 200 meters of the canal will be covered to avoid the adverse environmental, health and safety impact on the community.

### **Panel's Observations and Determination**

12. In accordance with its Operating Procedures,<sup>5</sup> after receiving the Request the Panel initiated its due diligence by reviewing the information in the Request and Program documents.

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<sup>2</sup> PAD, p. 7.

<sup>3</sup> PAD, p. 9.

<sup>4</sup> PAD, pp. 12-13.

<sup>5</sup> Inspection Panel, Operating Procedures, dated April 2014, pp. 12-13, available at: <http://inspectionpanel.org/sites/ip-ms8.extcc.com/files/documents/2014%20Updated%20Operating%20Procedures.pdf>.

13. The Panel met with Bank Management on February 6, 2019, to discuss the concerns raised in the Request. During the meeting, Management shared with the Panel a document from the Government of Egypt, through the Program Coordination Office, committing to complete the remaining 90 meters to cover the canal as originally foreseen in the design. Management noted that the work was expected to be completed within five months, including the time required for procurement. Management also informed the Panel that it would supervise the implementation of these commitments on a regular basis to ensure that the delivery is on track within the planned timeframe. On February 13, 2019, Management sent the Panel a memorandum indicating these commitments. Management's memorandum is attached to this Notice as Annex 2.

14. Since the receipt of the Request, the Panel communicated with the Requesters several times over email and through phone calls, including on February 11, 2019. The Requesters indicated that they had received letters from the Program Coordination Office stating that the work to cover the entire 200 meters of the canal would be completed within the planned period. The Requesters also informed the Panel of their satisfaction with the follow-up by the Program Coordination Office to resolve the issue raised in the Request.

15. The Requesters expressed their gratitude to the Program Coordination Office, the World Bank team and the Inspection Panel for having pursued a solution to their concerns. They also informed the Panel of their decision not to continue with this Request and to wait for the stated timeframe to elapse.

16. While the Panel determined that the Request for Inspection is admissible, it is not registering it since the Requesters decided not to move forward with the Panel process and to await completion of the work to cover the remaining 90 meters of the canal.

17. The Panel notes that the Requesters retain their right to submit a new Request for Inspection concerning the issue raised if the work is not completed as planned.

Yours sincerely,



Imrana Jalal

Attachments

Ms. Kristalina Georgieva, Chief Executive Officer and Interim President  
International Bank for Reconstruction and Development

The Executive Directors and Alternates  
International Bank for Reconstruction and Development



# **ANNEX 1**

## **Request for Inspection**

(Arabic original followed by English translation)



السادة / هيئة التفتيش بالبنك الدولي  
تحياتي لكم،

اتقدم انا [الاسم] بالاصالة عن نفسي وبالنيابة وبالتفويض من جميع السكان المحليين المقيمين والمستفيدين والمتضررين بموقع مشروع البنك الدولي بشكوى تتعلق باحد المشروعات الممولة من البنك الدولي في مصر والمعروف باسم برنامج التنمية المحلية لصعيد مصر والجاري تنفيذه بمحافظة قنا ( قنا و سوهاج ) واقيم في [العنوان] مركز جرجا - محافظة سوهاج - جمهورية مصر العربية - وبداية اود ان اطلب عدم الافصاح مطلقا عن هويتي لاي جهة / سلطة محلية في مصر . وللاتصال بي : [رقم الهاتف] البريد الالكتروني : [ البريد الالكتروني]

بداية يقصد بالمصطلحات الاتية :

- 1- ترعة [ اسم القرية] : هي المجرى المائي الذي يمر وسط الكتلة السكنية ويرغب السكان في تغطيته بطول 200 متر وقامت الدولة بتغطية 110 متر فقط بنسبة تنفيذ 55%
- 2- قرض البنك الدولي : القرض الممنوح من البنك الدولي الي جمهورية مصر العربية للتنمية المحلية بصعيد مصر بمحافظة سوهاج وقنا
- 3- مشروع تغطية التربة : الاعمال الهندسية والبنائية التي يتم عن طريقها تغطية سقف التربة وضمان مرور المياه اسفل السقف

• ما هي المشكلة ؟

- 1- نظراً للتلوث البيئي المنتشر وبناء على شكوى السكان المحليين وطلبهم المستمر منذ عدة سنوات للسلطات المحلية بشأن تغطية 200 متر من ترعة [اسم القرية]، تم اجراء مشاركة مجتمعية حضرها كل الاطراف السكان المحليين وممثلي الجهات الحكومية والسلطات، وانتهت تلك الاجتماعات واللقاءات الي الموافقة على تغطية جزء من ترعة [اسم القرية]واقترح تمويلها ضمن برنامج التنمية المحلية لصعيد والممول من قرض البنك الدولي.
- 2- تم الحصول على كل الموافقات الفنية اللازمة للمشروع من كافة الجهات ( وزارة الموارد المائية والري - جهاز شئون البيئة - محافظة سوهاج - الادارة العامة للري )
- 3- التكلفة المالية للمشروع حوالى 4 مليون جنيه مصري ( USD : 220000\$ )
- 4- تم ايقاف المشروع بعد نسبة تنفيذ 55% وتم تغطية 110 متر فقط بدلا من 200 متر

• ما هو الضرر المتوقع ؟

- 1- نظرا لعدم تغطية ترعة [اسم القرية] بطول 200 متر وتغطية 110 متر فقط اصبح بداية التغطية داخل الكتلة السكنية بدلا من ان يكون بعيد عنها مما سيرتب نتائج سيئة تتلخص في تراكم القمامة والمخلفات والحيوانات النافقة القادمة مع مياه التربة امام منازل السكان المحليين وستنتشر الحشرات والامراض وهو الامر الذي قد يؤدي في النهاية الي نزوح السكان المحليين من منازل نتيجة انتشار الامراض والحشرات امام بداية التغطية وهو ما يخالف بشدة دليل تشغيل برنامج التنمية المحلية ويخالف سياسيات البنك الدولي المتعلقة بالاضرار البيئية والاجتماعية نتيجة المشروعات الممولة من البنك الدولي

• ما هو حل تلك المشكلة ؟

- 1- الحل بسيط جدا وهو استكمال تغطية التربة بطول 200 كما هو متفق عليه منذ البداية والموجود بكافة المستندات الرسمية والمتوافق عليه من السكان المحليين ومن السلطات المحلية في مصر ومرفق كافة المستندات الرسمية المؤيدة

2- حيث ان تنفيذ نسبة 55% فقط من المشروع تسبب في اضرار بيئية في حين ان تنفيذ 100% من المشروع ستكون الاضرار المتوقعة بعيدة عن منازل السكان المحليين وبالتالي تختفي الآثار الاجتماعية والزوح الجماعي للسكان منازلهم والذي سيحدث قريباً اذا لم تحل تلك المشكلة وتستكمل التغطية وذلك حفاظاً على حياة و ارواح السكان والنساء والاطفال من الحشرات والامراض الناتجة عن تراكم المخلفات والقمامة والحيوانات النافقة والقادمة مع المياه فسي التربة والتي توقفت امام منازلهم نتيجة عدم استكمال التغطية بالكامل.

3- ان السكان المحليين المقيمين حول مشروع التغطية لا يطالبون بأي تعويضات ويدركون ان البنك الدولي لا يخالف سياساته المتعلقة بالآثار البيئية والاجتماعية وان كل ما نطلبه من البنك الدولي هو الوقوف بجانبنا ومساعدتنا في توجيه السلطات المحلية بمصر وخصوصاً وزارة الموارد المائية والري واللجنة الوزارية لبرنامج التنمية المحلية بصعيد مصر بان تقوم باستكمال المشروع بنسبة 100% حتى لا يتسبب ذلك في ضرر جسيم للسكان المحليين

• لماذا نلجأ الي هيئة التفتيش بالبنك الدولي مباشرة ؟ هل تواصلنا مع المسؤولين في السلطات المحلية وديوان مظالم البنك الدولي ؟

الاجابة :

1- نحن نلجأ الي هيئة التفتيش البنك الدولي بعد ان استنفذنا كل الوسائل المتاحة للتظلم والشكوى حيث ارسلنا تظلمات وشكاوى الي السلطات المحلية في مصر التي رفضت استكمال المشروع والتغطية .

2- بتاريخ 2018/11/26 تم ارسال شكوى الي ديوان مظالم البنك الدولي عبر البريد الالكتروني وافادوا انهم سيقومون بدراسة الشكوى خلال 10 ايام عمل ولم يتم الرد وتم استعجالهم مرة اخرى بتاريخ 2018/12/17 ولكن لا يوجد اي رد او لتلك المشكلة .

• المطلوب من هيئة التفتيش بالبنك الدولي ؟

نسأل ونطلب ونرجو ونتمنى ونلتمس ان تقوم هيئة التفتيش بالبنك الدولي بالمساعدة والوقوف الايجابي بجانب قضيتنا المشروعة وتوجيه طلب للسلطات المحلية في مصر وخصوصاً (اللجنة الوزارية المعنية بالبرنامج + والمكتب التنسيقي للبرنامج + ووحدة التنفيذ المحلية بسوهاج + ووزارة الموارد المائية والري + ومحافطة سوهاج ) وتحثهم فيه باتخاذ ما يلزم من اجراءات حتى يتم استكمال تنفيذ مشروع تغطية 200 من ترعة [اسم القرية]بدلاً من تنفيذ 110 متر فقط وذلك مراعاة وتجنباً للاضرار البيئية والاجتماعية الجسيمة التي ستحدث حتماً اذا لم يستكمل مشروع التغطية لترعة [اسم القرية]بنسبة 100%.

وشكراً جزيلاً لتعاونكم معنا،

مقدم الشكوى :  
السكان المحليين المقيمين في موقع المشروع  
ويفوضون / [الاسم]

مرفق بهذا البريد الالكتروني كافة المستندات الرسمية المؤيدة للشكوى كما مرفق البريد الالكتروني الذي تم ارساله الي ديوان مظالم البنك الدولي والمشار اليه باعلاه.



## **Informal Translation**

The World Bank Inspection Panel

Greetings to you all,

I am [name], acting on behalf of myself and on behalf of all local residents, beneficiaries and affected by the World Bank project. I am complaining about one of the projects financed by the World Bank in Egypt, the Upper Egypt Local Development Program for Results, which is being implemented in Qena and Sohag governorates.

I am a resident of [village name] - Gerga district - Sohag Governorate – Egypt.

At the outset, I would like to ask that my identity be kept confidential to any local authority in Egypt. To contact me, use the following phone number: [phone number], or email: [email address].

### **The beginning means the following terms:**

1- The [village name] canal: It is the canal that passes through the middle of the residential block. The population wants to cover it for a length of 200 meters. The authorities covered 110 meters implementing only 55% of the work

2- The World Bank loan: The World Bank loan to the Arab Republic of Egypt for local development in Upper Egypt, in Sohag and Qena Governorates

3– Canal cover project: It is the engineering design and construction work through which the canal is covered, and the passage of water is ensured

### **What is the problem?**

1. Due to the widespread environmental pollution and the local residents' complaints and their continuous requests to local authorities to cover 200 meters of the [village name] canal, a community participation meeting was organized and attended by local residents, representatives of government agencies and the authorities. The meeting resulted in an agreement to finance the cover of the [village name] canal through the local development program for upper Egypt funded by the World Bank Loan.

2. All the necessary technical approvals for the project were obtained (from the Ministry of Water Resources and Irrigation, the Department of Environment, the Sohag Governorate, and the General Directorate of Irrigation)

3. The financial cost of the project was about 4 million Egyptian pounds (US\$ 220000)

4 - The project was suspended after implementing 55% of the work and 110% of the canal was covered instead of 200 meters.

### **What is the expected damage?**

1 - Because the 200 meters of the [village name] canal are not covered, and only 110 meters are, the beginning of coverage is within the populated area rather than far away from them. This leads to negative impact from the accumulation of garbage and waste and dead animals passing through the water canal in front of the homes of local residents spreading insects and diseases. This may ultimately lead to the displacement of local populations from homes due to the spread of diseases and insects prior to the onset of coverage. This is in sharp contrast with the operating manual of the local development program and contrary to the World Bank's social and environmental policies for World Bank-financed projects.

**What is the solution to the problem?**

1- The solution is very simple. It is to complete the cover of the canal with a length of 200 as agreed upon from the beginning. It is available in all official and approved documents from local residents and local authorities in Egypt.

2. The implementation of only 55% of the project caused environmental damage while the implementation of 100% of the project will push the expected damage away from the homes of the local population and thus eliminate the social impact and mass displacement of the population from their homes. This displacement will occur soon if the problem is not resolved and the canal cover completed. Doing so, will preserve the lives of the population, women and children, from insects and diseases resulting from the accumulation waste and garbage and dead animals passing through the canal and stopping in front of their homes.

3. The local residents residing around the canal are not claiming any compensation and realize that the World Bank does not violate its environmental and social policies. All we ask for is the World Bank to stand by us and help us guide local authorities in Egypt, especially the Ministry of Water Resources and Irrigation, the Ministerial Committee for the Local Development Program in Upper Egypt to complete 100% of the project so that no serious harm is caused to the local population.

**Why do we go directly to the World Bank Inspection Panel? Have we communicated with local authorities and the World Bank Grievance Redress Service?****The Answer:**

1- We resort to the Inspection Panel of the World Bank after we exhausted all the means available for grievance and complaint. We sent grievances and complaints to the local authorities in Egypt, but they refused to complete the project and canal cover.

2- On 26/11/2018, a complaint was sent to the World Bank Grievance Redress Service via e-mail. They stated that they will review the complaint within 10 working days. But even after that, there was no response. Again, they were approached on 17/12/2018, but still no response.

**What is asked of the World Bank Inspection Panel?**

We ask and request and pray and hope that the World Bank Inspection Panel will assist and stand by our legitimate cause and ask the local authorities in Egypt, especially the Ministerial Committee on the Program, the Program Coordination Office, the Local Implementation Unit of Sohag, the Ministry of Water Resources and Irrigation, and the Governorate of Sohag, to complete the 200 meters canal cover of the [village name] instead of the 110 meters only. This in accordance and avoidance of the serious environmental and social impact that will inevitably occur if the project does not require the canal cover of [village name] up to 100%.

Thank you very much for your cooperation with us,

Complainant:

Local residents residing at the project site

Authorizing [name]

Attached to this e-mail are official documents supporting the complaint as well as the e-mail attachment sent to the World Bank Grievance Redress Service referred to above.

# **ANNEX 2**

## **Management Memorandum**




## OFFICE MEMORANDUM

RECEIVED 02/13/19



DATE: February 13, 2019

TO: Imrana Jalal, Chairperson, IBRD/IDA Inspection Panel

FROM: Laura Tuck, Vice-President, GGSVP 

EXTENSION: 32823

SUBJECT: ***Upper Egypt Local Development Program for Results (P157395)***

The *Upper Egypt Local Development Program for Results (UELDP)*, through a sub-project in Gerga district's (*Sohag* governorate) supports the backfilling of a small open canal of 200 m length passing through the village's built area. The cover of the canal will reduce health risk exposure and create a public recreational space. Implementation started July 10, 2018 but stopped after filling only 110 m of the canal. Management understands that this decision was based on a miscommunication between PIU and the Department of Irrigation.

In response to the Bank's request to complete the works the Government of Egypt, through the Program Coordination Office (PCO) for the UELDP, has committed to complete the 90 remaining meters of canal backfilling as originally foreseen in the project design.

The works are expected to be completed within five months, which is taking into consideration the expected time required for the Department of Irrigation to procure the services and to complete the backfilling works. The governorate will be financing the completion of the canal from UELDP Program financing through the existing allocation drawn down from an advance that is at its disposal.

The Bank's UELDP task team will supervise the implementation of these works on a regular basis to ensure that the delivery is on track within the stipulated time frame. Bank Management will advise the Panel once the works are completed.