

CIRA (Egypt) #30323

ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) - Dated September 7, 2011

	Action	Deliverable	Deadline	Responsible Person
1	Develop environmental, health and safety (EHS) procedures, facility guidelines and maintenance procedures that complies with IFC's PS and host country regulations and incorporate them into a social and Environmental management system (SEMS). SEMS should encompass social, occupational health and safety, human resources, and environmental affairs management associated with the full life cycle of operations from the selection of sites for expansion, the construction of new schools as well as the operation of existing schools and associated facilities.	SEMS Manual	Condition of First Disbursement	Mr. Mohamed EL Kalla
2	Existing facilities: Provide copy of exemption/clearance letters from Egypt's EEAA for all facilities. In instances where the Client is unable to provide the EEAA clearances for older facilities, the Client may provide IFC with a copy of the clearance from the Ministry of Education as a Condition of First Disbursement, and then later submit the clearance letter from EEAA as a condition of 6 months from commitment.	Exemption/clearance letters	Condition of First Disbursement for all EEAA clearances for new facilities, and Ministry of Education clearances for older facilities. AND Within 6 months of Commitment, for all remaining EEAA clearances for older facilities.	Eng. Maher Abo ELhassan
3	Provide a copy of the Initial Environmental Examination (IEE) study and EEAA approval for all new facilities	IEE & EEAA review and approval	Prior to start of construction works for all premises	Eng. Maher Abo ELhassan

4	Develop a formalized Community Grievance Mechanism to record, review and respond to community grievances.	a) Publicize the Community GM (on the Company's website and at school locations for the general public to see) – send IFC the relevant web link and photographic evidence of public posting.	a) Within 9 months of commitment	Mr. Mohamed EL Kalla
5	Ensure that future schools provide for the easy mobility of disabled persons including ramps and rails in all new facilities	Approved architectural plans that confirm coming building design is in accordance with internationally-recognized code for access to public buildings for persons with disabilities	Prior to start of construction works for all premises	Eng. Maher Abo ELhassan
6	Monitor potable water at each facility on a quarterly basis that they provide to the students.	Reported on in Annual Monitoring Report (AMR)	Within 12 months of first disbursement	Eng. Maher Abo ELhassan
7	Monitor the treated wastewater used for irrigation purposes on a quarterly basis to ensure the safety of the water for this purpose	Reported on in Annual Monitoring Report (AMR)	Within 12 months of first disbursement	Eng. Maher Abo ELhassan
8	Engage a qualified third party to audit the life and fire safety systems as currently installed and operated in existing buildings against a recognized international standard (such as that of France, Germany or the US) and ensure that corrective actions are	Third party life, fire and safety audit	Condition of First Disbursement	Eng. Maher Abo ELhassan

	implemented.			
9	Develop and implement a procedure to ensure that the design, construction and operation of new school buildings complies with Egyptian and at least one international life and fire safety standard, and that this is confirmed by independent review upon physical completion.	Policy and procedures incorporated into SEMS	Within 6 months of first disbursement	Eng. Maher Abo ELhassan
10	Develop a land acquisition and compensation procedure in keeping with IFC Performance Standard 5 to be followed for all Company land acquisition activities and documentation requirements for all new facilities.	Policy and procedures incorporated into SEMS	Within 6 months of first disbursement	Ms. Mona Samir