

# **Nefer Menya for Renewable Energy**

## **Stakeholder Engagement Plan**

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## Table of Contents

List of Figures .....	i
List of Tables .....	ii
Executive Summary.....	iii
1- Introduction .....	1
2- Project Description .....	4
3- Overview of Potential Environmental and Social Impacts.....	7
4- Regulatory Framework .....	9
4.1 National Regulations.....	9
4-1-1 Stakeholders Engagement Methodology .....	9
4.2 International Standards .....	10
5- Social Context of the Project Area .....	11
6- Stakeholder Identification .....	12
6.1 Stakeholders' Analysis.....	12
7- Stakeholder Engagement Process .....	16
7.1 Consultation during the Scoping and ESIA stages.....	16
7.2 Stakeholders Engagement Plan .....	21
7-2-1 Stakeholder Engagement channels .....	21
7-2-2 Stakeholder Engagement Resources .....	21
7-2-3 Stakeholder Engagement Communication Action Plan.....	23
8- Community Grievance Redress Mechanism (GRM).....	26
9- Workforce Grievance Mechanism .....	30
10- Monitoring and Reporting.....	31
10.1 Monitoring .....	31
10.2 Reporting.....	31
10.3 Institutional Arrangements .....	32

### Annexes

- Annex (1): Results of ESIA Consultation Meeting
- Annex (2): Templates for stakeholder engagement
- Annex (3): Grievance Register
- Annex (4): Grievance Form

### List of Figures

Figure 1: Location and surrounding activities of the project site .....	5
Figure 2: General Stages of PV Project Construction.....	6
Figure 3: Stakeholders' categorization .....	12
Figure 4: Proposed project's grievance mechanism system.....	27

List of Tables

Table 1: Potential Receptors and Impacts ..... 7

Table 2: Stakeholders Groups ..... 13

Table 3: Stakeholder Engagement Approach ..... 15

Table 4: Summary of the stakeholders consultation activities to date ..... 17

Table 5: Roles and responsibilities for SEP implementation ..... 22

Table 6: Timing of engagement for the different stakeholders..... 23

Table 7: Stakeholders communication Action plan ..... 24

Table 8: Roles and Responsibilities ..... 32

## Executive Summary

The Stakeholder Engagement Plan (SEP) to be implemented by project throughout its planning, construction, and operation phase. To meet requirements of international standards and Egyptian legislation, as detailed in section 4.2, the key principles of this preliminary SEP include:

- Early disclosure
- Design disclosure to support consultation
- Provide meaningful information to stakeholders
- Ensure the accessibility of information

The engagement of stakeholders will also outline, implement and communicate a grievance redress mechanism (GRM) by which stakeholders can communicate concerns to the project and be assured they will be addressed.

### Project description

The project consists of a 1000 MWac solar power generation project, including a 600 MWh Battery Energy Storage System (BESS), in West Nile Concession of the New and Renewable Energy Authority (NREA) in the Western Desert fringe of the Menya Governorate. This project aims to deliver the generated power to the national grid. The project will be connected to the national grid through an overhead transmission line (OHTL) to be constructed by the Egyptian Electricity Transmission Company (EETC), linking the project substation to the existing OHTL running parallel to the Giza - Aswan Western Desert Road at about 36 km east of the proposed project site.

The project E&S aspects of the construction and operation stages include:

- **Construction phase**
  - Dust/Particulate Matter/Gaseous Emissions
  - Noise and vibrations
  - Water Resource Requirements
  - Wastewater Generation
  - Solid waste generation
  - Hazardous waste generation
  - Increased Transportation Demand
  - Workers Influx
- **Operation phase**
  - Dust/Particulate Matter/Gaseous Emissions
  - Water Resource Requirements
  - Wastewater Generation
  - Solid waste generation
  - Hazardous waste generation
  - Glint

For each group of identified stakeholders, relevant E&S aspects will be discussed and consulted on from project initiation to its completion. Priority E&S impacts will differ according to stakeholder group and will be continuously reviewed and updated throughout the project lifetime.

**Stakeholder Identification**

Stakeholders identification took place taking into consideration the Project's Area of Influence (AoI)<sup>1</sup> as detailed in section 6, the extent of the anticipated impacts and the areas potentially affected by the induced and cumulative impacts of the Project.

Primary stakeholders include those who will be directly affected, positively or negatively by a development. These would, in particular, include low-income and marginalized groups who have traditionally been excluded from participating in development efforts and outcomes; as well as the local community-based organizations which might represent their interests in the project.

Secondary stakeholders may include agencies, experts, interested parties and anyone able to influence the outcome of the development.

**Stakeholder Engagement Approach**

The engagement method deemed most effective for each stakeholder group, as follows:

- Individual meetings are the method of choice for primary stakeholders and those organizations characterized by a high influence on the development
- Focus Group discussions are selected to interact with stakeholders characterized by a large number and a relative homogeneity.
- Fact sheets/ leaflets and official correspondence can be used to interact with secondary stakeholders.

**Stakeholder Engagement channels**

Proposed engagement channels include:

- Social media
- Press release via company
- Flyers (Factsheets)
- Face-to-face (one on one)
- Focus Group Discussions (FGDs) with vulnerable groups

In addition to the above, Grievances can be raised through direct contact with the CLO through the mobile and WhatsApp numbers and email address, typically posted on the grievance boxes at the site's gates as well as posted at the local municipality. In addition, Grievance forms are available at the project website. The CLO will be responsible to regular follow up with the different points to collect the complaints

**Community Grievance Redress Mechanism (GRM)**

The mechanism will be developed to ensure the processing of complaints related to the construction site and complaints from local resident. It will consider Stakeholder Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

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<sup>1</sup> AOI is defined based on expected activities during construction and operation phases taking into consideration direct and indirect impacts. However, AOI might be extended based on the results of stakeholders' consultation especially as these might point to additional indirect impacts.

**Monitoring and Reporting**

The SEP process will be reviewed based on regular stakeholder meetings. During these meetings, community members will be asked for feedback on the stakeholder engagement program. KPI are developed to assess the SEP implementation. The reporting of stakeholder engagement activities will be undertaken throughout the Project. This will help facilitate continuous improvement of the engagement process and its contribution to improving the project's E&S performance.

**Stakeholder Engagement Organizational Resources**

The Project will mobilize resources consisting of an E&S manager headquartered in Cairo, frequently visiting the site and a community liaison officer (CLO), preferably from the local community. The CLO will be responsible for necessary implementation of the SEP. The engagement activities will focus on:

- Disseminating Project information.
- Discussing potential impacts and risks and how they will be managed.
- Seeking views and concerns on the Project and its activities.
- Building trust with the Project and stakeholders including communities.
- Establishing effective feedback analysis mechanism and Grievance Mechanism.

The CLO will be a central point of stakeholder contact and engagement activities. The CLO will also be responsible for ensuring that the Community Feedback Procedure is active and effective and will closely coordinate with the developer's E&S and Human Resources (HR) teams in this regard. The CLO(s) is responsible for day-to-day management and face-to-face community engagement.

## 1- Introduction

The primary objective of the Stakeholder Engagement Plan (SEP) is to ensure that stakeholders are informed, consulted, and actively involved in the decision-making process for the project. The nature, frequency, and depth of stakeholder consultation and engagement vary considerably across projects and their phases and should be commensurate with the project's risks and adverse impacts, and the level of interest of potential stakeholders.

In the above context, this document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by project throughout its planning, construction, and operation phase.

To meet the requirements of international standards<sup>2</sup> and Egyptian legislation, the key principles of this preliminary SEP include:

- Disclose early – provide relevant information to targeted stakeholders in advance of decision-making.
- Design disclosure to support consultation – give potentially affected communities and/or stakeholders adequate information to allow them to participate in an informed manner.
- Provide meaningful information – ensure information provided is in a format and language that is readily understandable and tailored to the target stakeholder group so they can reach informed conclusions and provide informed input.
- Ensure the accessibility of information – ensure the intended recipient will most readily receive and comprehend the information through considering what information different stakeholders require, the format and how a stakeholder group is best engaged.

The engagement of stakeholders is an ongoing process which involves public disclosure of appropriate information, meaningful consultation with stakeholders. The process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. Moreover, it will also outline a grievance redress mechanism (GRM) by which stakeholders can communicate concerns to the project and be assured they will be addressed.

In general, it will be developed in the following phases:

- **Previous Stakeholders Engagement during the Preparation of the Project's ESIA**  
This stage outlines how stakeholders relevant to project have been identified and engaged. It captures the findings of the stakeholders consultation and engagement during the ESIA preparation. It highlights the process and outputs and the contributions of stakeholders to the ESIA preparation.

Within the above context, the approach and methodology for the stakeholders engagement at this stage were guided by the general objectives of the ESIA, namely to:

- Confirm that the scoping analysis addressed the Area of Influence and potential impacts.

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<sup>2</sup> Specifically, EBRD Environmental and Social Requirement 10 (Stakeholder Engagement), World Bank Environmental and Social Standard 10 (Information Disclosure and Stakeholder Engagement) and IFC Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts)

- Identify potential stakeholders and their potential interest.
  - Better understand the interest and influence of stakeholders and whether the important stakeholders are all accounted for.
  - Determine potential additional stakeholders as well as their potential inputs to the ESIA and SEP in subsequent phases.
  - Identify the potential environmental and social impacts that are of most interest and concern to stakeholders to ensure they are fully assessed in the ESIA.
- **SEP during project implementation**  
This stage will outline how stakeholders relevant to project will be updated and engaged. It will also define stakeholder engagement methods for the Project including recommended communication channels, key messages, steps for the establishment of an open dialogue with relevant stakeholders, proactive approaches necessary for specific stakeholders and participation of potentially affected communities as per international standards.

The Nefer project ESIA package will be disclosed and uploaded to the following websites:

IPH: <https://weareinfinitypower.com/projects>

HAU: <https://www.hassanallam.com/sustainability>

EBRD: <https://www.ebrd.com/>

The ESIA disclosure package, including a disclosure log and external grievance leaflet, will be available at the following locations (where approved by authorities):

#### 1. Governorate-level government buildings (Minya City)

- Minya Governorate Diwan (Diwan Aam El Mohafza) — Corniche El Nile, Minya City. Office of the Governor's Secretariat (Sekertaria Aama).
- Egyptian Environmental Affairs Agency (EEAA) – Central Department for Upper Egypt, Minya
- Minya Manpower & Labour Directorate (Mudiriyat El Quwa El Amla)

#### 2. Markaz / city-level government buildings (closest to the site)

- Mallawi Markaz & City Council (Magles Madinat Mallawi / Wahda Mahaliya)
- Abu Qurqas Markaz Council
- Toukh El Kheil Local Unit
- Saft El Khammar Local Unit

#### 3. Public spaces

- Egypt Post – Minya Main Office (Maktab Bareed Minya El Raisi)
- Egypt Post – Mallawi Main Office (Maktab Bareed Mallawi El Raisi)
- Mallawi Youth Centre (Markaz Shabab Mallawi)

#### 4. NGOs



- Caritas Egypt – Minya Office
- Upper Egypt Association for Education and Development (Gameiyat Saeed Misr)
- Egyptian Red Crescent – Minya Branch
- National Council for Women (NCW) – Minya Branch (Far' El Magles El Qawmi lel Maraa)
- National Council for Persons with Disabilities – Minya Branch

5. Project- and lender-specific

- Project sponsor's site/liaison office (on or near the project footprint, with posted opening hours).
- EBRD Resident Office in Cairo — EGID Building, Block 72, Ninety Axis, 5th Settlement, New Cairo.

## 2- Project Description

The project consists of a 1000 MWac solar power generation project, including a 600 MWh Battery Energy Storage System (BESS)), in West Nile Concession of the New and Renewable Energy Authority (NREA) in the Western Desert fringe of the Menya Governorate. This project aims to deliver the generated power to the national grid. The project will be connected to the national grid through an overhead transmission line (OHTL) to be constructed by the Egyptian Electricity Transmission Company (EETC) connecting the project substation to the existing OHTL running parallel to the Giza -Aswan Western Desert Road. The North-South Road is at a distance of approximately 30 km from the project site.

Figure 1 below shows the activities/land uses surrounding the proposed site.

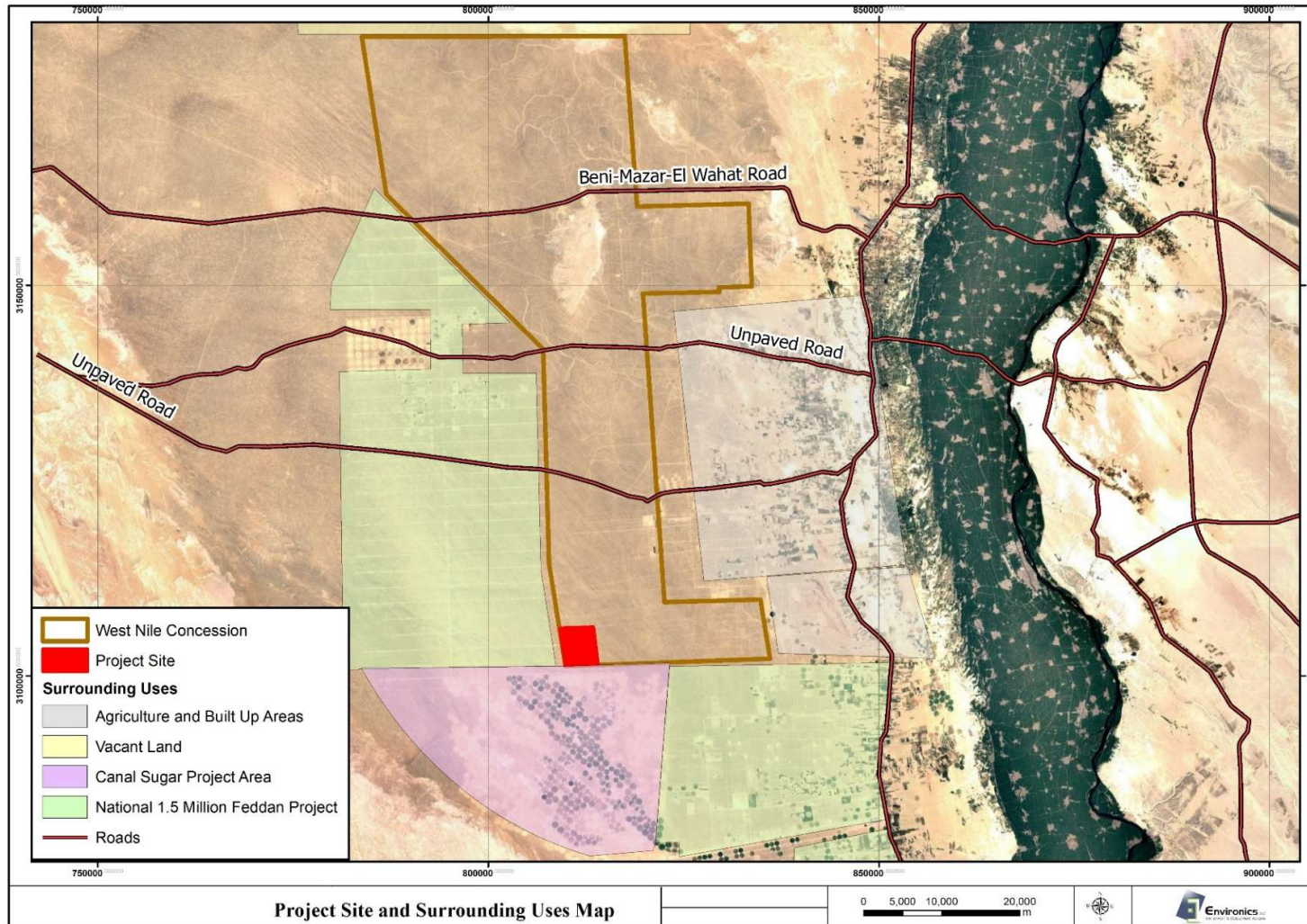


Figure 1: Location and surrounding activities of the project site



**Figure 2: General Stages of PV Project Construction**

### 3- Overview of Potential Environmental and Social Impacts

Potential environmental and social impacts of the construction and operation of the project plants are shown in Table 1

**Table 1: Potential Receptors and Impacts**

E&S Aspect	Potential Receptors	Potential impact
<b>Construction Phase</b>		
Land uptake	Biological components	biodiversity risks potentially including Disturbance to wildlife Habitat loss, modification, and fragmentation Potential impacts on tangible cultural heritage, if any
Dust/Particulate Matter/Gaseous Emissions	Ambient air, workers and adjacent communities, if any	Impacts from levelling, excavation and backfilling activities from construction vehicles machinery as well as use of transportation vehicles to transport the PV panels and other components equipment and construction materials.
Noise and vibrations	Workers	Potential impacts during construction. Noise and vibration during construction might be a source of annoyance. <u>It is noted that there are no residential communities near the project site.</u>
Water Resource Requirements	Water treatment plants and the community it serves	Water requirements during peak construction s about 300 m <sup>3</sup> / day for sanitary purposes and about 120m <sup>3</sup> / day for construction water. Water requirements could be met by the existing water treatment plants in the nearest city.
Wastewater Generation	Soil and groundwater The treatment plants where wastewater will be disposed of and the community it serves	Sanitary water from workers, gray water from accommodations and kitchens, Improper management may cause impact on soil However, the depth of the groundwater would make it highly unlikely to be impacted.
Solid waste generation	Workplace, workers and soil	Improper handling and management may have an impact on workplaces and workers as well as potential soil contamination as result of spills and leaks. It could also c attract stray animals
Hazardous waste generation	Workplace, workers and soil	Improper handling and management may have impact on workplace and workers as well as potential soil contamination as result of spills and leaks.
Increased Transportation Demand	Communities along the transport route	Transport of PV components, from port(s), construction material and equipment water, wastewater and waste as well as workers will be considerable, which can affect the roads, the road users and communities along the transport routes in addition to potential accidents.
Workers Influx	Workers, communities where accommodation will take place	The large number of workers during the construction phase may put pressure on the resources of the nearest communities.  Social impacts of workers influx on the host communities, if accommodated off-site such as issues GBVH related issues, employment creation and procurement creation.  In addition, inadequate temporary accommodation may have impacts on the workers' welfare.
<b>Operation Phase</b>		

E&S Aspect	Potential Receptors	Potential impact
Dust/Particulate Matter/Gaseous Emissions	Occupational work environment	Very limited emissions potentially resulting from on-site movements for maintenance activities
Water Resource Requirements	Water treatment plants and the community it serves	Expected to be limited for domestic purposes due to small number of operation workers. (10m <sup>3</sup> /day)  Cleaning of PV panels is planned to be dry, but a water cleaning campaign may take place from time to time (one or twice a year). This will be the occasion to renew (use and replenish) the water in the firefighting tanks
Wastewater Generation	Soil and groundwater The treatment plants where wastewater will be disposed of and the community it serves	Although of limited quantities due to small number of operation workers, yet if improperly managed may have potential impact on soil but unlikely ground water, due to its depth and the limited generated volume.
Solid waste generation	Workplace, workers and soil	Although of limited quantities due to small number of operation workers, if improperly managed, wastes may have potential impact on soil and as well as potentially attract stray animals.
Hazardous waste generation	Workplace, workers and soil	Although of limited quantities (except of Li-batteries at their end of life) resulting from maintenance activities, yet if improperly manages may have potential impact on soil
Glare	Changes in landscape appearance	No visual impacts are expected on the neighboring environment since there are no sensitive residential communities within the vicinity. Moreover, the agricultural activities south of the project do not require the constant presence of labor. However, it could the users of road south of the project.

For each group of identified stakeholders, relevant E&S aspects will be discussed and consulted on from project initiation to its completion. Priority E&S issues will differ according to stakeholder group and these will be continuously reviewed and updated throughout the project lifetime.

## 4- Regulatory Framework

### 4.1 National Regulations

According to the national EIA guidelines, issued by EEAA in 2010, the public consultation and disclosure take place with focus on the environmental and social aspects related to the project and does not address the political or economic aspects or any other aspects not to be addressed in the ESIA.

#### 4-1-1 Stakeholders Engagement Methodology

##### *i) Public Consultation during ESIA Scoping*

As per the national EIA guidelines, the stakeholders' consultation is to be undertaken twice during the ESIA preparation process for Category C projects (Category A according to international systems). The ESIA scoping phase aims to agree on the aspects and impacts that will be addressed and analysed in the ESIA study. Stakeholders' meetings could be held with each concerned party individually or can take the form of a collective meeting to which the concerned parties are invited. The scoping stage is to result in:

- Obtaining the opinion of the parties concerned regarding the environmental and social aspects to be addressed by the project ESIA
- Indicate if there is a need to address additional E&S issues in the ESIA
- Identify additional parties concerned to be consulted, if any

##### *ii) ESIA Consultation*

After the draft ESIA is prepared and before its submission to the environmental authority, the disclosure of Category C ESIA is to take place through a public consultation<sup>3</sup>. The aim of the public consultation is to present the result of the ESIA to the concerned parties with the opportunity to be reassured that their relevant concerns, raised during the scoping stage, have been addressed in the ESIA, as relevant, and to be comfortable with the proposed mitigation measures.

According to the national system, the public consultation is to be held in a form of a unified meeting (a public hearing session) to which the representatives of all concerned parties are to be invited, and as a minimum those who have participated in the scoping stage. These include:

- Representatives of the EEAA
- Related government authorities
- Representatives of the Governorate and local units where the project is located
- Representative of affected groups including local businesses and communities, NGOs and civil society groups (as relevant to the project location, type and resulting impacts)
- Media representatives

It is to be noted that the project is categorized by the national EIA guidelines<sup>4</sup> as a Scoped-B project, not requiring a public consultation

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<sup>3</sup> Other lower category projects are not required undertake public consultations

<sup>4</sup> Project categorization lists, updated in June 2023



### iii) *Continuous Engagement*

The EIA guidelines emphasise on the importance of continual consultation/engagement with the surrounding community. It, however, does not specify/recommend the means for engagement.

## 4.2 International Standards

Stakeholder engagement is a critical component of international Lender standards. The European Bank for Reconstruction and Development Performance Requirement EBRD ESR 10 focuses on information disclosure and stakeholder engagement. It aims to ensure that EBRD-financed projects are transparent and that affected communities are informed, consulted, and involved in decision-making processes throughout the project cycle. ESR10 requires meaningful consultation, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.

Similarly, the International Finance Corporation (IFC)<sup>5</sup> recognizes the importance of stakeholder engagement as the basis for building strong, constructive, and responsive relationships essential for the successful management of a project's environmental and social impacts.

The World Bank and IFC<sup>6</sup> have identified five steps for iterative consultation as follows:

- **Planned ahead:** Before beginning a stakeholder consultation process, it is useful to think about who needs to be consulted, over what topics, and for what purpose.
- **Consulting using basic principles of good practice:** depending on the project context, good practice consultation should start early in the process, be targeted, informed and meaningful, localized and two-ways, gender inclusive and documented.
- **Incorporated feedback:** feedback received during the consultation process to be taken seriously and making best efforts to address issues raised through changes to project design
- **Documented:** documentation of the consultation activities and their outcomes is critical to effectively managing the stakeholder engagement process
- **Reporting back:** to follow up with consulted stakeholders regarding actions taken and next steps.

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<sup>5</sup> the Environmental and Social Policy and Procedures (ESPP) of the US International Development Finance Corporation (DFC) apply the E&S Performance Standards of the IFC

<sup>6</sup> World Bank Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, <https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-stakeholderengagement1.pdf>



## 5- Social Context of the Project Area

Key social aspects are summarised as follows:

- **Population:** The population of Menya Governorate has grown significantly since the 2017 census. As of 2025<sup>7</sup>, the governorate boasted an estimated 6,511,377 inhabitants, up from 5,497,095 in 2017<sup>8</sup>—a rise of approximately 18.5% over six years. The governorate covers approximately 32,279 km<sup>2</sup>, yielding an average density of 202 people per km<sup>2</sup> of 2025. Rural residency continues to dominate: an estimated 81% of Menya's population lives in rural areas, compared to Egypt's national average of 57%. The population of Markaz El-Menya in 2017 was 676,181 people, equivalent to 12.3% of the total population of the governorate.
- **Education:** Illiteracy rate among those over 10 years reached 27% in Menya in 2016, which is higher than the national average of 25%. Illiteracy rate among females is (45%) higher than males (29%) in the governorate (CAPMAS, 2016). Some children drop out of school as sometimes low-income families encourage their children to work for extra income.
- **Employment:** Employment in Menya remains predominantly informal and agricultural. The informal economy is driven by agriculture, construction, retail, and family-owned trades. Public sector jobs continue to dominate formal employment, particularly in education and healthcare.
- **Health facilities:** There are five governmental and 6 private hospitals in Markaz El Menya (Menya Governorate Information Center, 2025).
- **Infrastructure:** The project site does not have access to telephone, natural gas, a water network, or a sewage network. The closest paved road to the project site is the Giza–Aswan West Desert Road, located about 40 km to the east, followed by the Beni Mazar–El Wahat Road, located approximately 60 km to the north. Moreover, several unpaved tracks serve the surrounding land reclamation projects; these tracks originate from the Giza–Aswan Road and generally run in an east–west direction
- **Drinking water:** The total water design capacities of the water treatment plants in Menya and Abo Qurqas are 313,240 and 106,320 m<sup>3</sup>/day respectively. The Markaz of Menya has a total of 15 water treatment plants. Their capabilities vary from 2000 to over 100,000 m<sup>3</sup>/day of which only 5 have capacities of more than 20,000 m<sup>3</sup>/day. On the other hand, Markaz Abo Qurqas has only 2 treatment plants of capacities of 4,320 and 102,000 m<sup>3</sup>/day.
- **Sewage:** The wastewater of the town of Menya is treated in the Talla Wastewater treatment plant which has a capacity of 53,600 m<sup>3</sup>/day and could accommodate the wastewater generated by the project in its peak construction period.
- **Cultural heritage:** There are no registered antiquities or cultural heritage sites in the vicinity of the project site. The nearest recorded archaeological site in West Menya is the ancient city of *Oxyrhynchus* (Al-Bahnasa), located approximately 71 km northeast of the project area (Kwok and Peters, 2020). Additionally, the Beni Hassan tombs, situated on the eastern bank of the Nile, are located about 67 km from the Project Site.

<sup>7</sup> Central Agency for Public Mobilization and Statistics (CAPMAS). Annual Statistical Yearbook of the Arab Republic of Egypt, 2025.

<sup>8</sup> Central Agency for Public Mobilization and Statistics (CAPMAS). *Population Census of the Arab Republic of Egypt, 2017*.

## 6- Stakeholder Identification

This section describes the stakeholder groups identified to date, including those identified for future engagement. Stakeholder identification will be an ongoing process, requiring review and update. This section elaborates in detail the approach for engagement with identified stakeholder groups.

The Project's Area of Influence (AoI) associated infrastructure, the extent of the anticipated impacts, and the areas potentially affected by the induced and cumulative impacts of the Project were considered to identify stakeholders comprehensively. Stakeholder groups can broadly be divided into stakeholders who:

- May be directly and/or indirectly affected by the project.
- May have an interest in the project or the areas that may be affected.
- Have the potential to influence project outcomes or operations.

In general, primary stakeholders are those who will be directly affected, positively or negatively by a development. These would, in particular, include low-income and marginalized groups who have traditionally been excluded from participating in development efforts and outcomes; as well as the local community-based organizations which might represent their interests in the project, and in all cases, can help to access communities in general and these groups in particular.

Secondary stakeholders may include agencies, experts, interested parties and anyone able to influence the outcome of the development. These mainly include Central Government, line ministries, local government/authorities, implementing agencies, national and international lending institutions, media, and academic institutions. Secondary stakeholders are important as they provide valuable data and information specific to the area, i.e. they are a source of secondary data.

### 6.1 Stakeholders' Analysis

A preliminary stakeholders' analysis was conducted to assign importance to stakeholders, understand their roles with respect to the project, and help identifying their engagement approach.

The stakeholders can be categorized into the four quadrants shown below.

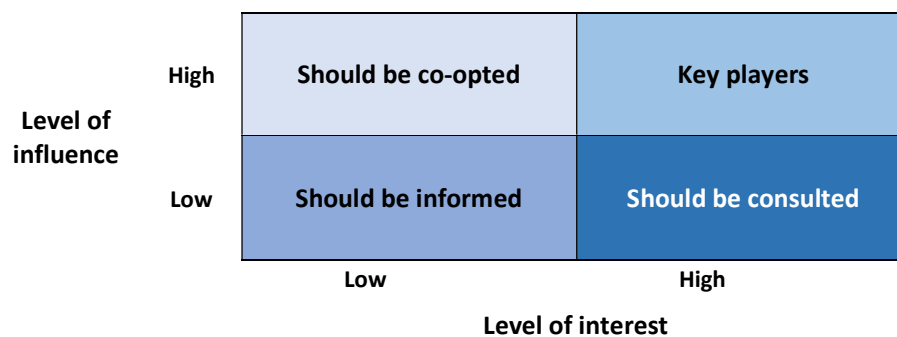


Figure 3: Stakeholders' categorization

Stakeholders have been identified considering the following factors:

- Project's nature and activities;
- Geographical extension and location of the project; and
- Environmental and Social aspects and potential impacts of the project

Accordingly, the following preliminary key stakeholder groups have been identified in Table 2 below

**Table 2: Stakeholders Groups**

Stakeholder Category	Stakeholders	Level of Influence	Interest	Impact, Influence and Interests
<b>Primary Stakeholders</b>				
Local Businesses	Business owners in the nearest/most accessible cities and towns	Low	High	Economic interest in the project (providers of goods and services).
	Agricultural operators	Low	Low	These could be affected by the project activities during construction , and could be party to mutual support over the project's life time.
Local Communities/ residents	Nearest communities to the project site	Low	High	Provision of workforce, may include key leadership figures of community stakeholders  <b>Some roads could also be impacted by transportation activities.</b>  <b>Others could be affected by the project demand for water and other supplies.</b>
	Local NGOs	Low	High	These can provide social context and effective contacts to concerned communities
Workers	Employees of the developer and the contractors	High	High	Exposure to occupational health and safety risks Economic benefits
Vulnerable groups (specific vulnerable groups will be identified as the Project development proceeds)	women groups, disabled groups, elderly groups, etc..	Low	High	Such groups have a vested interest in the project due to mainly potential for job opportunities. In addition, such groups could be impacted by other potential negative impacts (e.g., worker influx, Gender Based Violence and Harassment (GBVH), etc.)

<b>Secondary Stakeholders</b>				
National Regulators/ agencies & Permitting Authorities	NREA EEAA EIA department and Nature Protection Sector	High	Low	Includes authorities and agencies responsible for project permitting approvals.
Other relevant agencies	Egyptian Electricity Transmission Company Ministry of Transport (roads and bridges Authority, Ministry of Interior traffic department) Water and Wastewater company	High	Low	Mostly related to utilities infrastructure such as the OHTL, water and wastewater services as well as access routes to the project site.
Local Government	Menya Governorate and Markaz of Menya and Abu Qorqas.	High	High	The Governorate, and the municipal government are of political importance as they are home to the primary stakeholder and therefore could have a role in maximizing benefits and/or controlling adverse impacts. They also have a key role in issuing project construction permits as well as supplying utility services and security. In addition, support in facilitating advertising job opportunities and receiving applications from the communities
Healthcare Providers and emergency services	Main hospitals and healthcare units	Low	Low	Would need to cater to the large workforce attracted by the project
Media	National and local mass media and newspapers	Low	Low	Channel to disseminate information; key public opinion influencers.
Finance	Lending Institutions	High	Low	<b>Project implementation depends on financing from institutions but represent a limited share of their portfolio</b>

Preliminary stakeholder mapping and categorization is presented in Table 3, and will continue throughout the project life. The table also proposes the engagement method deemed most effective for each stakeholder group, as follows:

- Individual meetings are the method of choice for those organizations characterized by a high influence on the development
- Focus Group discussions are selected to interact with stakeholders characterized by a large number and a relative homogeneity.
- Fact sheets/ leaflets and official correspondence can be used to interact with secondary stakeholders.

**Table 3: Stakeholder Engagement Approach**

Stakeholder Category	Approach	Engagement Method
Local Businesses =	To be consulted	Focus group discussions
NGOs	To be informed	Focus group discussions
Local Communities residents/ community)	To be consulted	Focus group discussions
National Regulators/ agencies & Permitting Authorities	To be co-opted	Individual meetings
Financing Institutions	To be Co-opted	Individual meetings
Agencies overseeing Associated activities	Key players	Individual meetings
Local Government	Key players	Individual meetings
Healthcare Providers	To be informed	official correspondence
Education institutions	To be informed	Fact sheets/ leaflets and official correspondence
Media	To be informed	Focus group discussions
Workers	Key players	Individual meetings
Vulnerable groups	To be Consulted	Focus group discussions

## 7- Stakeholder Engagement Process

As stakeholder engagement is an ongoing process, future engagement activities during the pre-construction and mobilization, construction and operations will ensure that information disclosure and consultation activities are effective and meaningful for all stakeholders over the lifetime of the project.

### 7.1 Consultation during the Scoping and ESIA stages

Initial stakeholder consultation activities were initiated at the scoping and ESIA stage. Following Table 4 below presents the previous stakeholders consultation activities. In addition, Annex 1 presents the results of the ESIA consultation meeting to date.

Table 4: Summary of the stakeholders consultation activities to date

Topic	Discussions
<b>3/11/2025: Menya Governorate</b>	
<p><b>Secretary General Office</b></p> <p><b>Attendees:</b>  Labour  EIA  OHTL (associated facility)  Workers accommodation  Waste management and disposal  Water and WW management  Project access roads</p>	<ul style="list-style-type: none"> <li>The meeting included the relevant heads of the concerned departments in the governorate. These included: <ul style="list-style-type: none"> <li>Secretary General of Menya Governorate</li> <li>The governorate environmental unit</li> <li>EEAA regional branch office (RBO)</li> <li>The governorate urban planning department</li> <li>Governorate energy efficiency unit</li> <li>Governorate information system</li> <li>Youth Employment department</li> <li>Governorate information center</li> <li>Labour office</li> <li>social solidarity</li> </ul> </li> <li>Issues raised included the following: <ul style="list-style-type: none"> <li>E&amp;S categorization according to EEAA guidelines</li> <li>OHTL route and related activities (construction and operation)</li> <li>the number and qualifications of workforce required</li> <li>the project's daily water demand</li> <li>the workers accessibility to the project given its significant distance from the communities.</li> <li>Jobs advertisement mechanism</li> <li>Workers accommodation</li> <li>Administrative affiliation of the project site area</li> <li>Existing access roads</li> </ul> </li> </ul> <p><b>Discussions/responses</b></p> <ul style="list-style-type: none"> <li>Upon discussion with the representative of EEAA RBO it was confirmed that the project category is Scoped B according to EEAA project classification lists issued in June 2023. Accordingly, EEAA would not require organizing a public consultation.</li> <li>The number of workers will reach up to 5000 workers during peak construction and about 100 during the operation phase.</li> <li>The labour qualifications required include low and semi-skilled labour for the construction works as well as highly skilled technical qualifications for the installation of the PV panels in addition to project management engineers.</li> <li>The project team clarified that the main contractors and sub-contractors will be encouraged to seek labour from the surrounding communities.</li> <li>Due to the site remoteness, attended advised that an on-site workers camp is the most suitable option for workers accommodation. In addition, the closest communities (at about 50km) are small communities and would not be able to accommodate large number of workers.</li> <li>The advertisement mechanism of the job opportunities and receipt of workers applications is proposed to take place through the governorate youth employment department.</li> <li>The head of the labour directorate advised that a data base exists including the different categories of construction contractors and their specialisations.</li> <li>It was clarified by the project team that the estimated water demand for the project during the construction phase is about 120m<sup>3</sup>/day. The attendees proposed utilizing groundwater to meet the project needs to avoid daily water trucking from the nearest water treatment plant which is at Toukh El Kheil located at about 49 km from the site.</li> <li>The project can be accessed through the Western Desert Road main road at about 40km east of the project site then through Al Ain service road (under construction).</li> </ul>
<b>4/11/2025: Meeting at ATLAS and with Local investors in surrounding agricultural activities</b>	
<b>ATLAS</b>	<ul style="list-style-type: none"> <li>A meeting was held with the Manager of ATLAS for Surveying, Engineering and General Contracting</li> </ul>

	<ul style="list-style-type: none"> <li>Discussions held with groundwater wells in surrounding agriculture activities and potential use of groundwater by the project.</li> </ul>
<b>Local Investors</b>	<p>The meeting included representatives surrounding agricultural activities. The issues raised included:</p> <ul style="list-style-type: none"> <li>Energy demand in the area and potential project contribution to support the energy needs of the surrounding agriculture activities</li> <li>Groundwater resources and quality</li> <li>Water and wastewater and waste management facilities</li> <li>Potential observations of avifauna in the area</li> <li>Labour availability and labour accommodation in the communities</li> </ul> <p><b>Discussions/responses:</b></p> <ul style="list-style-type: none"> <li>The attendees inquired if the project could provide the required energy to the neighbouring agriculture activities. It was clarified that the project will evacuate the generated energy to the national grid and not to the individual users.</li> <li>It was clarified that the project will generally support the national energy demand.</li> <li>Regarding water supply, attendees advised that there are various licensed groundwater wells in the area that are used by the surrounding agricultural activities. They advised that instead of water trucking, the PV project may purchase water from the neighbouring wells. The project team advised that such option could be investigated including the allowable water abstraction from the different wells.</li> <li>Reportedly, the nearest wastewater treatment plant in Tukh El Kahil village can receive the generated wastewater.</li> <li>The nearest waste landfill is located in Balansoura village at about 50km east of the site.</li> </ul>
<b>5/11/2025: Saft El Khammar and Toukh El Kheil Local Units – Toukh El Kheil Water Treatment Plant</b>	
<b>Saft El Khammar Local Unit</b>	<ul style="list-style-type: none"> <li>The meeting was held as it was reported that the project is administratively affiliated to Saft El Khammar Local Unit</li> <li>After reviewing the different maps, Heads of the Local Unit, mentioned that the project is affiliated to Toukh El Kheil Local Unit and not to Saft El Khammar.</li> <li>Accordingly, Saft El Khammar representatives suggested to meet the Head of Toukh El Kheil Local Unit, and accompanied the team to Toukh El Kheil.</li> </ul>
<b>Toukh El Kheil Local Unit</b>	<ul style="list-style-type: none"> <li>The project site is administratively affiliated to Toukh El Kheil Local Unit.</li> <li>Reportedly the population of Toukh El Kheil is about 95,000 persons. The vast majority of population work as farmers.</li> <li>The municipality has one primary school, one preparatory school and one secondary school. No technical schools are available in the area.</li> <li>The municipality is served by one water treatment plant, and one wastewater treatment plant is currently under construction and not yet operational. The area currently uses underground tanks for domestic wastewater disposal.</li> <li>Reportedly, the area experiences frequent water shortage, especially in summer, when the water consumption increases and the water plant cannot meet such increasing seasonal demand.</li> </ul>
<b>Toukh El Kheil Water Plant</b>	<ul style="list-style-type: none"> <li>The plant was established in 2007 with capacity of about 5,184 m<sup>3</sup>/d.</li> <li>It is located at about 49 km from the project site.</li> <li>The water treatment takes place through sand bed filtration and chlorine dosing</li> <li>Reportedly, the capacity of the plant has not been increased since its establishment and there are no current plans for expansion to meet the continuously growing population demand.</li> <li>It is not certain that this water plant can meet the project water requirements during the construction activities.</li> <li>There is a larger plant at Towa Village, with a capacity of about 8,000 m<sup>3</sup>/d.</li> </ul>



<b>16/3/2026 Menya City Council</b>	
<b>Attendees</b> <ul style="list-style-type: none"> <li>– Deputy Head of Menya City Council</li> <li>– Head of environmental department –Menya city</li> <li>– Head of environmental department – Abu Qurkas city</li> </ul>	<ul style="list-style-type: none"> <li>• Issues discussed included the following: <ul style="list-style-type: none"> <li>– The project's water demand and the capacities of existing water treatment companies within Menya and Abo Qurkas cities. The head of Menya city council indicated that the project needs to apply to the Menya water company indicating the required water demand. He advised that the water company will be able to secure the required water demand.</li> <li>– The Menya city waste management capacity: The head of Menya council environmental department advised that a solid waste landfill is currently under development at Toukh El Kheil area. Another waste dumpsites exist in Balansoura in Abo Qurkas and Mallawi.</li> <li>– The workforce required: It was advised that job advertisements, labour qualifications of and receipt of workers applications can be done through the Menya governorate labour office.</li> <li>– Workers accommodation: it was advised that accommodation within the closest villages is not a preferred option mainly because housing in the villages are mostly family homes and do not offer renting for foreigners from outside the village. In this respect, accommodation would be recommended to take place within Menya of Abo Qurkas urban areas where renting is available</li> <li>– The wastewater of the town of Menya is treated in the Talla Wastewater treatment plant which has a capacity of 53,600 m3/day and could accommodate the wastewater generated by the project in its peak construction period. .</li> </ul> </li> </ul>
<b>Chairman of Menya Water and Wastewater company</b>	<ul style="list-style-type: none"> <li>– The total water design capacities of the water treatment plants in Menya and Abo Qurkas are 313,240 and 106,320 m3/day respectively.</li> <li>– The Markaz of Menya has a total of 15 water treatment plants. Their capabilities vary from 2000 to over 100,000 m3/.day of which only 5 have capacities of more than 20,000 m3/day</li> <li>– On the other hand, Markaz Abo Qorkas has only 2 treatment plants of capacities of 4,320 and 102,000 m3 /day.</li> <li>– Discussions focused on the ability of the nearest water treatment plants to meet the project water demand. Representatives advised that the daily water needs, about 500m3/day, cannot be met through one of the nearby water treatment plants.</li> <li>– In this respect, the project needs to coordinate with the water company in advance to enable planning the supply from different water treatment plants within the governorate.</li> <li>– There are two options to acquire water, namely this could be through direct contract with the water company for water supply. In this case, water could be provided from the plants in which capacity permits, and the water company would use its own trucks. Alternatively, the project could contract a private company using its own trucks to acquire water from points specified by the water company.</li> </ul>
<ul style="list-style-type: none"> <li>– Head of EEAA Menya RBO</li> <li>– Head of environmental department- Menya governorate</li> </ul>	<p>Discussions included the following topics:</p> <ul style="list-style-type: none"> <li>– The catagorisation of the project where it was indicated that project is categorised as Scoped B project according to the national EIA system.</li> <li>– Accommodation of workers: Representatives advised that accommodation can be provided within Menya urban centres. In addition, considering workers camps on site, similar to the practice of the agricultural projects in the area, will reduce the costs of extensive transportation given the significant distances between the site and the Menya city centres.</li> </ul>

	<ul style="list-style-type: none"> <li>– Transportation: it was indicated that the new Sammalout and Mallawi axes can be used for transportation of imported PV modules and BESS components whether from Sokhna or Safaga ports.</li> <li>– Labour: It was advised that unskilled labour are available in Menya governorate, while highly skilled technical and specialised labour will need to be sought from outside the governorate.</li> </ul>
NGOs	<p>A meeting took place with various NGOs working in different community support areas. Discussions included the following issues:</p> <ul style="list-style-type: none"> <li>– Labour: the project may attract skilled construction workers in the governorate, thus potentially adversely affecting other construction activities. However, it was clarified that the temporary nature of construction activities is not expected to have significant impact on the other construction activities</li> <li>– Capacity building: an issue was raised regarding the potential provision of capacity building to the technical school students to qualify them to work for the project. It was clarified that due to the relatively limited project construction time frame, provision of capacity building can be provided within the scope of the project CSR plans.</li> <li>– Workers code of conduct is emphasized where accommodation of workers would take place within urban communities to control for potential frictions with the community including GBV.</li> <li>– Role of NGOs: attendees indicated that NGOs may play a role in providing awareness to the communities with regard to the project and information about the skills needed by the project. They can also play a role with regards to potential areas of community supporting the project 's CSR plans. Moreover, NGOs can support the project through monitoring many issues including e.g. workers' conduct or impact on rental costs Agreement with the project on issues to monitor could be discussed in due time</li> </ul> <p>NGOs can also contribute to training personnel on general skills such as first aid.</p> <p>Employment of physically or mentally disabled individuals: Although a 5 % share of employment is required by law, this is not expected to apply to individual projects especially in the construction phase but rather on the total employment of the contractors. During operation, more permanent jobs could be available depending on the specific conditions of individuals.</p>
<b>17/3/2026- New Menya Urban Authority</b>	
Deputy Head of New Menya Urban Authority	<p>Discussions included the following topics:</p> <ul style="list-style-type: none"> <li>– Water treatment capacity: it was indicated that the design capacity of new Menya city is about 95,000m<sup>3</sup>/day to be operated in two phases of 45,000 and 50,000 m<sup>3</sup>/day. The current production of the first phase is 36,000m<sup>3</sup>/day</li> <li>– It was advised the construction activities within the new Menya city are still on going and have not yet reached its maximum capacity. Accordingly, the current excess capacity makes it easy to supply the water needs of the project. Wastewater treatment capacity is also available</li> <li>– It was also indicated that large number of the existing buildings are not yet occupied, thus providing sufficient workers accommodation. However, it was recommended to avoid concentrating large number of workers (especially unskilled workers), in one neighbourhood to avoid potential disturbances to the communities.</li> <li>– Potential adverse impacts of the project may include increasing the cost of construction labour. However, due to the temporary nature of the construction activities, such impacts would not be significant.</li> <li>– Waste management: there are two waste dumpsites for solid and construction wastes.</li> <li>– Regarding medical services, there is only one specialized hospital, Cardiothoracic Hospital, within new Menya city. Plans for construction of a Central Hospital are underway expected to be established in 2027. In addition, a number of small health units exist that can provide first aid services.</li> </ul>

## 7.2 Stakeholders Engagement Plan

The Project will mobilize resources consisting of an E&S manager headquartered in Cairo, frequently visiting the site and a community liaison officer (CLO), preferably from the local community. The CLO will be responsible for necessary implementation of the SEP. The engagement activities will focus on:

- Disseminating Project information.
- Discussing potential impacts and risks and how they will be managed.
- Seeking views and concerns on the Project and its activities.
- Building trust with the Project and stakeholders including communities.
- Establishing effective feedback analysis mechanism and Grievance Mechanism.

The approach and programme for stakeholder engagement that will be used are described below.

### 7-2-1 Stakeholder Engagement channels

The following communication channels would be used

Mechanism	Description
<b>Social media</b>	The official Facebook page of Menya governorate could be used as a primary source of information. There are also communities Facebook that could be used.
<b>Press Release via Company</b>	The company project website, which contains key project information and updates. Updates on the project can be found at the project website.
<b>Flyers (Factsheets)</b>	Job vacancies and other project information will be posted at the governorate webpage and local labour offices, NGOs and social media
<b>Face-to-face (one on one)</b>	Face-to-face communication is usually a preferred method of communication with the communities. The project intends to assign a community liaison to facilitate more effective face-to-face community engagement.
<b>Focus Group Discussions (FGDs) with vulnerable groups</b>	The project will hold annual FGDs with vulnerable groups such as the elderly, women, illiterate people, people with special needs and any community members who may not be able to participate in formal meetings.

In addition to the above, a Grievance form related will be disclosed at key locations such as local municipality office, NGOs, and private sector/professional, organizations as well as the project website. The CLO will be responsible to regular follow up with the different points to collect the complaints.

Annex (2) provides the template for stakeholder engagement activities

### 7-2-2 Stakeholder Engagement Resources

The implementation of the SEP requires a systematic approach to inform, engage and take onboard feedback from stakeholders and revise the plan, as necessary. The Developer will assign a Community Liaison Officer (CLO)/team which will be based in Menya city. The CLO will closely coordinate with the developer's E&S and HR teams.

The CLO(s) is responsible for day-to-day management and face-to-face community engagement. The CLO will be a central point of contact in Menya and undertake the engagement activities and to build and maintain robust relationships with local residents, businesses, NGOs and other stakeholder groups. The CLOs will also be responsible for ensuring that the Community Feedback Procedure is active and effective.

The CLO will undertake the following responsibilities:

- Address any grievances expressed by the local communities through the GM.
- Identify any significant new E&S issues that may arise as the project progresses.
- Maintain records relating to consultations.
- Prepare internal and external reports on social performance.

The CLO will also develop and maintain a Project Stakeholder Register that will be updated monthly. It will serve as a log for all consultation and engagement undertaken for the Project.

Table 5 below presents the roles and responsibilities for the SEP implementation.

**Table 5: Roles and responsibilities for SEP implementation**

Responsible Party	Roles and Responsibilities
Project Management	<ul style="list-style-type: none"> <li>– Oversee the overall implementation of SEP, including frequent interfacing with CLOs.</li> <li>– Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of the SEP</li> <li>– Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.</li> </ul>
E&S manager	<ul style="list-style-type: none"> <li>– Regularly update the SEP and Grievance Mechanism</li> <li>– Implement and monitor stakeholder information exchange and participation strategies.</li> <li>– Reporting to project management</li> <li>– Government and lenders liaison</li> </ul>
Community Liaison Officer (CLO) (Male and Female)	<ul style="list-style-type: none"> <li>– Participate in the update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning.</li> <li>– Overall responsibility for implementing the requirements of the SEP plan</li> <li>– Interaction with the community</li> <li>– Undertaking monthly internal audits and Reporting to E&amp;S management</li> <li>– Coordinate with the EPC Contractor's team</li> </ul>
EPC Contractor / Project Operator	The EPC Contractor and its subcontractors(s) have the role in addressing the community grievances related to their workforce and report to the CLO.

Annex (3) presents a template of the proposed register.

### 7-2-3 Stakeholder Engagement Communication Action Plan

Table 6 below presents the timing of engagement for the different stakeholders with respect to the project phases. In addition, presents the stakeholder engagement action plan to include relevant stakeholders, the objectives of the consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

**Table 6: Timing of engagement for the different stakeholders**

Stakolders	Design stage	Construction stage	Operation
Local Businesses	✓	✓	X
Agricultural Activities	X	✓	X
NGOs	✓	✓	X
Local Communities residents	✓	✓	✓
National Regulators/ agencies & Permitting Authorities	✓	✓	X
Ministry of transport – roads and bridges	✓	✓	X
Ministry of interior -Traffic department	✓	✓	X
EETC	✓	✓	✓
Water and wastewater company	✓	✓	✓
Other relevant stakeholders (local governments and municipalities regulatory directorates in Menya	✓	X	X

Table 7: Stakeholders communication Action plan

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
<b>Primary Stakeholders</b>					
<b>Local Businesses =</b>	Manage local contractor expectations Assess the capacities of relevant local suppliers and urge contractors to increase local content	Disclose information procurement plan, on project updates and development needs	Leaflets Workshops	Three workshops pre-construction, with relevant suppliers and contractors Ad-hoc as needed during construction	Relevant developer team, CLO
<b>Agricultural Activities</b>	Impacts related to traffic density during construction	Information about grievance mechanism	Leaflets	Once before construction starts	CLO
<b>NGOs</b>	Community investment initiatives. Assistance with outreach to vulnerable groups	Project information and disclosures, <b>potential CSR activities</b> and Disclosure of (SEP) including grievance mechanism	One-on-one meetings, FGDs, Prepare leaflet in Arabic with updates on Project including environmental and social issues	As required	Relevant developer team, CLO
<b>Workers</b>	Occupational health and safety risks, code of conduct and workers grievance mechanism, economic benefits	Project information and health and safety requirements and Disclosure of grievance mechanism	– Induction trainings – Internal meetings /toolbox talks	– Upon employment – Continuous during construction and operation	Developer HSSE Team / EPC Team as applicable
<b>Local Communities residents/ community)</b>	Provision of workforce,  Pressure on roads and utilities  Social impact of worker influx	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism, project labour needs, potential CSR activities and disclosure of (SEP) including grievance mechanism	- FGDs, leaflets - Ongoing engagement from CLO	Once before construction (to be updated when required)	Relevant developer team, CLO
<b>Secondary Stakeholders</b>					
<b>Regional Government (Menya Governorate, Menya and Abo Qurkas city councils)</b>	Licensing renewal, security, employment and business opportunities, community investment initiatives	Disclose information on project updates and development	One-on- one meetings, written formal correspondence	Bi-annually or as required	Developer team as relevant

Stakeholder	Potential issues/ concerns	Key messages	Communication mechanism	Frequency	Responsibility
<b>NREA</b>	Issuance of operation permits	Disclose information on project updates and development	One-on- one meetings, written formal correspondence	<ul style="list-style-type: none"> <li>– During ESIA development</li> <li>– Issuance of operation permit and as required</li> </ul>	E&S manager and other Developer team as relevant
<b>EEAA</b>	ESIA approval , project follow up and ESMP inspection	Disclose information on project updates and development	One to one meetings, written formal correspondence,	<ul style="list-style-type: none"> <li>– At the scoping and ESIA preparation</li> <li>– Biannually or as required</li> </ul>	Developer E&S manager
<b>Local Labour office</b>	Employment & business opportunities, work permits.	Disclose information on project updates and development	One-on-one meetings, written correspondence	In advance of sub-contracting. Bi-annually or as required	E&S Manager, CLO & Project Human Resource representatives
<b>Healthcare service providers</b>	Handling of Site personnel emergency injuries & Corporate Social Responsibility activities for Community	Health related risks, impacts and mitigation plans.	One-on-one meetings, written correspondence.	As required	E&S Manager, & CLO
<b>Education providers (specifically technical /vocational training institutes)</b>	Project updates, opportunities available	Skill requirements, per project information and disclosures	One-on-one meetings	As required	E&S Manager, & Project Human Resource representatives & CLO
<b>Other Agencies relevant to utilities:</b> (Ministry of Transport roads and bridges department, Traffic department of Ministry of Interior) Local Water and wastewater company	Project updates and utility requirements and planning	Disclose construction information and project and time schedule and needs	One-on-one meetings, written correspondence	As required	Relevant developer team as

## 8- Community Grievance Redress Mechanism (GRM)

A Grievance Redress Mechanism (GRM) is not the primary tool to address grievances. Ideally, grievances are minimized through managing impacts and through pre-emptive stakeholder engagement designed to anticipate and address potential issues before they become grievances. Accordingly, the GRM should be in place to detect and address grievances not thus pre-empted.

A grievance is defined as an issue, concern, problem or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve. In alignment with the EBRD PRs (2019), the Grievance Mechanism (GM) will “seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue of concern”<sup>9</sup>. The mechanism will also allow for anonymous complaints to be raised and addressed.

The community grievance mechanism should be established from the beginning of the ESIA process and be in place during construction, operations and decommissioning.

The process covers all components and activities of the Project, including those activities undertaken by contractors and subcontractors on behalf of the Project.

The response time between starting the investigation and reaching a resolution should be as short as possible<sup>10</sup>.

A computerized database could also be established to record all complaints/ grievances along with the complaint's closure/ resolving date. This will include the proposed actions, the exact date on which the complaint will be resolved, the actual date when it was resolved, and the effectiveness of the response to the complaint. Once database is designed, it will be operated, and a team will be trained on how to use it.

Figure 4 shows the proposed project's grievance mechanism system.

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<sup>9</sup> IFC PS 2012, para. 35 (Grievance Mechanism for Affected Communities)

<sup>10</sup> The time frame for grievance resolution depends on the nature and scale of the grievance. However, as guidance, the grievance resolution time frame to be within resolution: within 30 days of receiving the grievance. EBRD Grievance Management Guidance Note



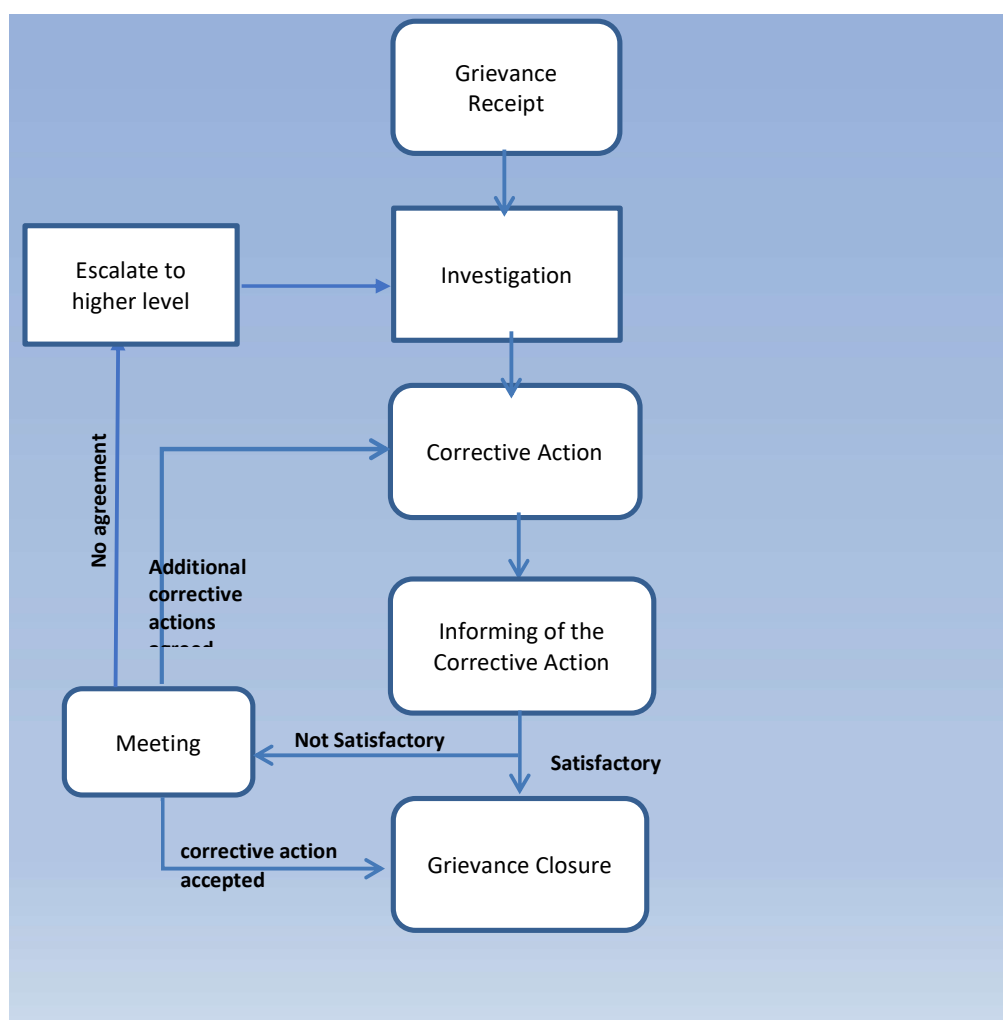


Figure 4: Proposed project's grievance mechanism system

- Grievances can be lodged in writing or verbally, as appropriate. The CLO will promptly acknowledge receipt of the grievance (in maximum of 24 hours) and explain (in writing or verbally whichever is more appropriate) in brief the process of redress that will be followed, which depending on the case might need objective investigation, and specify the expected time for resolution, which might be case-sensitive but would not exceed 15 days
- Grievances may also be lodged anonymously
- A grievance box will be placed at the project site as well as in different locations (e.g. in municipal units in which the area of influence of the project falls or at the buildings where workers are accommodated in the city) to ensure these are easily accessible to community members.. The telephone contact of the CLO will also be widely shared and published via the different communication channels described above, as well as on trucks serving the project
- A Grievance form will be displayed at key locations as well as on the company website. The Grievance form will inform the communities on how and where to submit a grievance. Annex (4) presents a template for the grievance form.
- Women will be offered the opportunity to report grievances to and receive feedback from a female representative.
- All grievances will be recorded in the grievance register, indicating details of the grievant, status and address of the person, type of stakeholder, the date on which the grievance happened and was recorded, a brief description of the grievance, detail on whether the grievance is a once-off or ongoing / repeated matter, and the outcome that is being sought;
- Grievance investigation will be recorded.
- After the grievance has been resolved, the resolution will be communicated to the grievant. The date on which the matter was resolved and a summary of the resolution will be recorded in the grievance register. Should the complainant still be dissatisfied, the complainant may appeal.
- The GRM will be communicated to all stakeholders through the CLOs prior to and during the project implementation.
- On a monthly basis, the grievance register will be reviewed to ensure all grievances are captured, and responded to. Implementation of the measures proposed to address the grievance should be checked and the close-out of the grievance monitored.

### **Stakeholder Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse**

Handling grievances related to: Violence Against Women and Girls (VAWG), Gender-based Violence (GBV), Sexual Exploitation and Abuse (SEA) will be undertaken in accordance with the requirements Best Practice Note addressing SEAH and GBV and EBRD/IFC<sup>11</sup> good practice Addressing Gender-Based Violence and Harassment.

For any grievances related to the above, the following steps will be considered:

<sup>11</sup>EBRD, Emerging Good Practice for the Private Sector Addressing Gender-Based Violence and Harassment, <https://www.ebrd.com/news/2020/new-guidance-for-private-sector-on-addressing-risks-of-genderbased-violence-and-harassment.html>

- CLO (male/female) will receive appropriate training (could be through the National Council for Women) on how to collect GBV cases confidentially and empathetically so that to respond appropriately to a survivor's complaint.
- Ensure confidentiality throughout the process.
- Survivor information should not be disclosed or stored in the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- The CLO should assist the survivor by referring them to potential GBV support entities in the area for support after receiving a complaint from a survivor.
- The CLO and the Project Manager (with support of other concerned entities as relevant and as agreed with the survivor) will agree on a plan for resolution as well as the appropriate remedy for the perpetrator.

## 9- Workforce Grievance Mechanism

The Grievance mechanisms for workers will be separate from public grievance mechanisms. However, several key management principles apply to both communities' and workers' grievances. Workers grievance mechanism shall be developed to address issues or grievances raised by the Project workforce. The EPC and the sub-contractors will need to integrate the Nefer company grievance mechanism into their management systems. Nefer company must ensure that the workers of subcontractors have access to a grievance mechanism. This may include placing contractual obligations on contractors to introduce and operate grievance mechanisms.

The EPC and subcontractor grievance mechanisms should be based on the same principles as those in this document and should be made available to all workers, even those employed on a short-term or temporary basis.

All workers should be made aware of the grievance mechanism at the time of hiring. Details of how it operates – including up-to-date contact points – should be readily accessible (for example, in staff handbooks and on notice boards)

/main . The requirements of the workers grievance mechanisms should as minimum include:

- Accessibility to all workers,
- Allow for confidential complaints and those requiring special protection measures, such as reports of gender-based violence
- Responsiveness, i.e. resolving grievances in the shortest possible delay
- Non retaliatory and allows for possible anonymity
- Allows for escalation to higher echelons of the organization

The mechanism will allow access to the project owner for auditing and follow up purposes

## 10-Monitoring and Reporting

### 10.1 Monitoring

To ensure the smooth operation and the effectiveness of the stakeholder engagement process, including that the disclosure and consultation efforts are implemented meaningfully and continuously, a monitoring, analysis and reporting process will be adopted by the project.

The SEP will be monitored through regular stakeholder engagement meetings. During these meetings, community members will be asked for feedback on the stakeholder engagement program. The indicators that will be used to monitor the implementation of the SEP will include, but not be limited to the following:

- Dates of publication and distribution and Locations of distribution of project information
- Number of engagement activities (place, dates and number of participants)
- Number of men and women that attended each of the meetings above
- Number and types of comments by stakeholders
- Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental agencies, Local authorities, NGOs).
- Issues raised by NGOs and other Stakeholders, actions agreed and status of those actions
- Number of grievances received from affected people and from external stakeholders
- Number of community grievances (i) open, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
- Categorization of grievances (by topic – e.g. noise/ safety), disaggregated by complainant's gender
- Number of grievances raised by workers, disaggregated by gender of workers and worksite
- Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.

### 10.2 Reporting

The reporting of stakeholder engagement activities will be undertaken throughout the Project. This will help facilitate continuous improvement of the engagement process and its contribution to improving the project's E&S performance. Stakeholder engagement activities and significant changes or updates in the project, stakeholders' concerns, as well as environmental and social issues will be continuously reported and published to a wider audience in a transparent way through public domain documents.

All grievances will be summarised and reported to management on monthly basis

All action plan requirements at completion of construction and during operations, the project will consider preparing an Annual Report<sup>12</sup> on the project's social and environmental performance. The annual report and the Stakeholder engagement activities and significant changes or updates in the project and the environmental and social issues will be annually reported and published to a wider audience in a transparent way through public domain documents.

### 10.3 Institutional Arrangements

As mentioned in section 7.2.2 above, the SEP will be managed by a Community Liaison Officer (CLO). Table 8 provides the institutional roles and responsibilities of implementing the SEP.

**Table 8: Roles and Responsibilities**

Responsible Party	Roles and Responsibilities
Project Management	<ul style="list-style-type: none"> <li>– Oversee the overall implementation of SEP, including frequent interfacing with CLOs.</li> <li>– Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of the SEP</li> <li>– Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.</li> </ul>
E&S manager	<ul style="list-style-type: none"> <li>– Regularly update the SEP and Grievance Mechanism</li> <li>– Implement and monitor stakeholder information exchange and participation strategies.</li> <li>– Reporting to project management</li> <li>– Government and lenders liaison</li> </ul>
Community Liaison Officer (CLO) -(Male and Female	<ul style="list-style-type: none"> <li>– Participate in the update the SEP as required during the project's lifetime, to include planning, construction, operation, and decommissioning.</li> <li>– Overall responsibility for implementing the requirements of the SEP plan</li> <li>– Interaction with the community</li> <li>– Reporting to E&amp;S management</li> <li>– Coordinate with the EPC Contractor's team</li> </ul>
EPC Contractor / Project Operator	The EPC Contractor and its subcontractors(s) have the role in addressing the community grievances related to their workforce and report to the CLO.

<sup>12</sup> Different lenders may require higher reporting frequency (monthly or quarterly). The project will report in shorter intervals (monthly or quarterly) according to different lenders requirements

## **Annex (1): Templates for stakeholder engagement**

## Stakeholder Meeting Minutes Form

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Project Name: \_\_\_\_\_ Date of Meeting: \_\_\_\_\_ Time  
of Meeting: \_\_\_\_\_ Location: \_\_\_\_\_ Facilitator/Moderator: \_\_\_\_\_

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### Attendees:

Name	Phone no.	Organization
_____	_____	_____
_____	_____	_____

### Key Discussion Points:

#### 1. Challenges and Risks

- Summary: \_\_\_\_\_
- Action Item: \_\_\_\_\_  
Responsible Party: \_\_\_\_\_  
Deadline: \_\_\_\_\_

#### 2. Quality Control and Safety Measures

- Summary: \_\_\_\_\_
- Action Item: \_\_\_\_\_  
Responsible Party: \_\_\_\_\_  
Deadline: \_\_\_\_\_

#### 3. Any Other Business (AOB)

- Summary: \_\_\_\_\_
- Action Item: \_\_\_\_\_  
Responsible Party: \_\_\_\_\_  
Deadline: \_\_\_\_\_

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### Next Meeting Details:

- Date: \_\_\_\_\_
- Time: \_\_\_\_\_
- Location/Platform: \_\_\_\_\_
- Tentative Agenda: \_\_\_\_\_

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Minutes Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_



**Annex (2): Grievance Register**

Submission Date	Name of Complainant/ (could be Anonymous)	Brief Description of Grievance	Corrective Action implemented	Complainant's satisfaction (Y/N)	Meeting Results (In case corrective action is not satisfactory)	Closure Date

## **Annex (3): Grievance Form**

Grievance Form	
<b>1. Contact Information</b>	
1.1 Complainant Full Name:	The complainant has the right to write his name or submit the grievance anonymously
1.2 Phone No.	
<b>2. Details of Complaint</b>	
2.1 When it occurred:	
2.2 Where it occurred:	
2.3 Who was involved:	
2.4 Description of Complaint:	
<b>3. Proposed Corrective Action</b>	
What would you like to see happen to resolve the problem?	

## **Annex (4): ESIA Consultation Meeting**

**ESIA Consultation Meeting: Stakeholders Comments and Responses**

No.	Affiliation	Questions Raised	Responses
1.	Director of the Department of Environmental Affairs in Menya Governorate	<ul style="list-style-type: none"> <li>You mentioned that a labor camp will be set up and I think their number will be large, so what will be done about their sewage waste, especially since the nearest sewage treatment plant will at considerable distance?</li> </ul>	Domestic wastewater will be collected and properly contained in tanks that will be regularly emptied and transported to an authorized wastewater treatment. And given the distance there have been discussions about potential use of the grey water onsite for dust suppression, not yet confirmed, such that it would minimise the quantities of wastewater to be transported. In addition, transportation of large quantities may increase the demand transportation price in the area, which is a social impact that is worth paying attention to.
2.	Egyptian Countryside Development Company (El Reef El Masry)	<ul style="list-style-type: none"> <li>The project is close to the reclaimed agricultural lands that the company is working on reclamation, and you mentioned that the generated electricity will be transmitted to the national unified electricity grid. The company has already a medium voltage power line under construction, so can the Nefer PV project support our electricity needs directly or it he to be through the national grid?</li> </ul>	<ul style="list-style-type: none"> <li>The contractual agreement between the PV project company and the Government of Egypt states that all the generated electricity is to be transmitted to the national grid. The PV project does not have the freedom to choose to sell electricity.</li> <li>El Reef El Masry company may need to approach the Egyptian Electricity Transmission Company to ask if it is possible to coordinate direct transmission to you.</li> </ul>
3.	Better Life Foundation for Development	<ul style="list-style-type: none"> <li>It was mentioned that this project is not the first to be established by the Nefer PV project consortium since they have established similar projects in Benban. So will the previous</li> </ul>	<ul style="list-style-type: none"> <li>The Benban project was the beginning of the big PV projects in Egypt. The proposed project is has a larger capacity than Benban and the consortium companies had extensive experience in Banban project. This previous</li> </ul>

No.	Affiliation	Questions Raised	Responses
		<p>experiences of these projects be benefited in this one?</p> <ul style="list-style-type: none"> <li>• Second, only environmental risks were mentioned, and I think that there are other risks that should have been studied and prepared for.</li> </ul>	<p>experiences will of be very beneficial especially in training workers as well as coordination between investors in the construction of utilities</p>
4.	Director of the Energy Conservation Unit in the Governorate	<ul style="list-style-type: none"> <li>• Why has the BESS been considered whilst it would be more expensive even though previous projects were direct to the company?</li> </ul>	<ul style="list-style-type: none"> <li>• Current national strategy is to rely on renewable energy to a greater extent which is planned to be 42% by 2030, and since such energy is variable in production, so it has become necessary to involve storage in times of abundance so that it can be used in times of low production such it does not affect the grid stability.</li> <li>• There is another benefit of batteries, which is when performing maintenance for parts of the plant or the need to pump a larger amount as a result of overloads, so the stored energy is taken advantage of.</li> </ul>
5.		<ul style="list-style-type: none"> <li>• What are the management measures to ensure proper waste and wastewater disposal</li> </ul>	<ul style="list-style-type: none"> <li>• Waste contractors will be required to install a GPS tracking device in their waste transportation vehicles so that their route is confirmed and it is ensured that the have submitted to the authorized waste/wastewater disposal facilities. transport companies have a contract with the exchange companies.</li> </ul>

No.	Affiliation	Questions Raised	Responses
			<ul style="list-style-type: none"> <li>• Only authorized waste contractors will be used. In addition, a waste manifest system will be applied.</li> <li>• Regarding the wastewater tanks these will be insulated PVC tanks properly contained to make sure that no leakage takes place. are placed and covered from the top to</li> <li>• On the other hand solid waste and other types of hazardous waste these will be stored onsite in designated areas and properly segregated.</li> <li>• Hazardous waste quantities are somewhat limited and is mostly batteries, used tires, or filters, while the solid waste during the construction period is mostly wood, cardboard, paper, and so on.</li> <li>• Clinical waste will be disposed off through authorised contractors.</li> </ul>
6.		<ul style="list-style-type: none"> <li>• What is the negative effect of glare?</li> </ul>	<ul style="list-style-type: none"> <li>• The panels are designed to absorb light, and only very small faction could be reflected that may be reflected and result in glare,</li> <li>• It is annoying and not dangerous, especially since the surrounding area has no road, so drivers are affected by it.</li> </ul>
7.	Directorate of Labor in Menya	<ul style="list-style-type: none"> <li>• There must be an occupational safety and health organisational capacity in the project to ensure the proper application of occupational safety and health policies, and is to be responsible for identification f the different</li> </ul>	<ul style="list-style-type: none"> <li>• The project company already has highly qualified and experienced EHS team that develops the occupational health and safety plans and undertakes training of workers on such plans.</li> </ul>



No.	Affiliation	Questions Raised	Responses
		<p>potential occupational risks and develop the risk management plans.</p> <ul style="list-style-type: none"> <li>The labour directorate at Menya governorate can provide the project with a OHS checklist to apply them in the project.</li> </ul>	<ul style="list-style-type: none"> <li>All plans are developed and implemented in accordance with the national regulations and international E&amp;S standards,</li> <li>In addition, the EHS officers will also follow up on the procedures for the implementation of theses management plans.</li> </ul>
8.	Future Eve Foundation	<ul style="list-style-type: none"> <li>The first point you mentioned is that there will be a high demand for transportation and we did not mention how to deal with it, especially that the entrance to Menya or the agricultural road and the entrance to the desert road is already very crowded, especially in the winter and the movement of students</li> <li>Regrading the welfare of workers, are there clear procedures meant by workers' welfare, especially that it is a large number?</li> <li>Regrading contractors' commitment to occupational safety and health, has it been announced in sufficient time for contractors and workers to prepare by preparing the required legal requirements?</li> <li>Regrading protection of women and integrating them into the supply chains this is a good thing, please clarify the measures to be implemented to address this issue.</li> </ul>	<ul style="list-style-type: none"> <li>Regarding traffic, coordination will be made with the local traffic departments to develop traffic plans</li> <li>The working hours of the project will avoid the rush hours during the day time of the students going out in schools or universities, for example, such that the work in the project does not affect the roads during this period.</li> <li>Workers' welfare: <ul style="list-style-type: none"> <li>The worker's work area must be suitable (e.g. providing fresh water, meals during the working day and transportation to and from the work area) as well as other workers amenities at the workers camp</li> <li>Proper rest area will be provided.</li> <li>Providing mobile bathrooms within the project area and providing health standards in them.</li> <li>A grievance mechanism will be developed to address workers' complaints with the utmost transparency.</li> </ul> </li> </ul>

No.	Affiliation	Questions Raised	Responses
			<ul style="list-style-type: none"><li>• Subcontractors' compliance with international standards<ul style="list-style-type: none"><li>○ It will be the responsibilities of the EPC contractor.</li><li>○ The EPC contractor will hold a consultation session with the representatives of the local community and will talk about the project and its needs, whether from different companies for supplying water, drainage, equipment... etc.</li><li>○ The general contractor will have a list of specifications or requirements from each contractor depending on the task or job they will be performing</li><li>○ A project Community Liaison Officer ( CLO) will be appointed who will be responsible for coordination and communication with the local community, and among the tasks assigned to him is to make sure that the local community has received all the information about the project, and to introduce the available jobs and how to apply for them, and to make sure that they have reached the largest possible number of people.</li></ul></li><li>• Job advertising: There will be a project website in coordination with the Labour Office where jobs will be advertised.</li></ul>

No.	Affiliation	Questions Raised	Responses
			<ul style="list-style-type: none"> <li>There will be announcements on the Ministry of Labour page, the Labour Directorate's e-page, and the governorate's page, and the required jobs and their requirements will be clarified. The project can also benefit from the database at the youth employment department at the governorate.</li> </ul>
9.	Directorate of Labour in Menya	<ul style="list-style-type: none"> <li>There is an office at the labour directorate called employment offices that have a ready database for all the required professions in which all artisanal workers are registered as well as different categories of contractors.</li> </ul>	
10.	Secretary General of Menya Court and member of the National Council for Women	<ul style="list-style-type: none"> <li>We need to know the role of women and is she an actress in this project</li> <li>I see that the project has hard work, will it be suitable for women's work and will there be real opportunities for women's work?</li> </ul>	<ul style="list-style-type: none"> <li>The jobs available to women in the project are many, including occupational safety and health jobs, human development specialist, complaints specialist, etc. etc.</li> <li>We faced a challenge in the Benban project in Upper Egypt for women's work – and a large percentage of women are now working on this project.</li> <li>Job opportunities are offered in full transparency and here will be no discrimination between males and females - there will be full transparency and those who meet the terms of the job will be hired</li> </ul>
11.		<ul style="list-style-type: none"> <li>Are there expectations for the role of NGOs in the project?</li> </ul>	<ul style="list-style-type: none"> <li>NGOs can be the communication channel between the project and the community.</li> </ul>

No.	Affiliation	Questions Raised	Responses
			<ul style="list-style-type: none"> <li>• For example, the NGO would be the channel through which information about the complaints mechanism and the effort that will be made with it are disseminated and communicated to the communities.</li> <li>• It is also possible to have cooperation protocols with NGOs and local universities includes organising periodic visits to the project.</li> <li>• NGOs can be also the facilitate the project reach out to vulnerable groups within the communities such as women people with disabilities.</li> </ul>
12.	Al Karma Contracting & General Supplies Company	<ul style="list-style-type: none"> <li>• We as a company represented in the local community – when will it be our turn, who we will work with and when will work on the project begin?</li> </ul>	<ul style="list-style-type: none"> <li>• The start of the project when it takes all the necessary approvals from the concerned authorities, including the Environmental approval.</li> <li>• The start of the project will be several months after the appointment of the EPC contractor.</li> <li>• The EPC contractor, after being appointed, will start communication with the communities and the different contractor to discuss all issues related to procurement and the mechanism of tendering will be clarified.</li> <li>• All procedures are done transparently and are announced by the EPC contractor</li> </ul>
13.	Director of the Environmental Affairs Authority in Menya	<ul style="list-style-type: none"> <li>• How will the hazardous wastes resulting from excavation and also non-hazardous wastes be disposed of?</li> </ul>	<ul style="list-style-type: none"> <li>• As previously mentioned the disposal of solid waste will take place through authorised contractors</li> </ul>

No.	Affiliation	Questions Raised	Responses
		<ul style="list-style-type: none"> <li>How will solid waste be disposed of?</li> </ul>	<ul style="list-style-type: none"> <li>Hazardous wastes, mostly include used oils, batteries, medical waste and will be transported and disposed off by authorized hazardous waste contractrs.</li> <li>Other non-hazardous wastes such as wood, paper and cardboard, they will be recycled, so the party that will take these wastes must be an approved entity and then have the necessary environmental licenses and approvals</li> </ul>
14.	National Council for Women	<ul style="list-style-type: none"> <li>Is there a specific plan to train workers before they are hired?</li> </ul>	<ul style="list-style-type: none"> <li>This project will be the nucleus of the big project in Menya Governorate where other PV projects with be constructed with NREA concession..</li> <li>Workers on this project will be qualified to work and train other workers in the coming PV projects.</li> <li>As for training from universities and technical schools: as happened in the Benban project.</li> <li>There are two types of training: (1) training to work in this project, and it will often be in the operational phase because it is extended – I can train them and then they work on the project. (2) Training resulting from social responsibility – in the sense that I train people although I will not benefit them in working on this project, but they will be the nucleus of the labor market in other similar future projects.</li> </ul>

No.	Affiliation	Questions Raised	Responses
15.	Professor at the Faculty of Engineering, Menya University	<ul style="list-style-type: none"><li>• Solar panels are cleaned periodically, so is there any idea to use the water from cleaning in agriculture so that it improves the environment under solar panels like plants that don't need the sun?</li><li>• Will the panels be titanium coated?</li></ul>	<ul style="list-style-type: none"><li>• Cleaning will be dry most of the time, and the expectation is that wet cleaning of the panels will take place only twice a year.</li><li>• Cleaning with water will not result in a lot of water that can be utilized.</li><li>• In addition, most of the panels on the market are coated with layers that prevent dust from sticking to them such that they do not require wet cleaning.</li></ul>
16.	Head of the EEAA RBO in Menya and Beni Suef	<ul style="list-style-type: none"><li>• Is there a future thought to maximize the utilization of residues and reuse greywater back into agriculture?</li><li>• Is it possible to make a green fence with sewage waste?</li></ul>	<ul style="list-style-type: none"><li>• There is a Difficulty in Using Grey Water in Agriculture and the resulting water will not be large</li><li>• It is not possible to establish green landscape because it will attract insects, reptiles and may affect cables</li></ul>