

Complaint to the Director of the Inspection Board at the World Bank

Requesting inspection of the North Giza Plant Project for the Production of Electric Power

In the context of the policies set by the World Bank to protect the rights of people and local communities when implementing WB projects in the different countries, especially the developing countries, and in light of the protective policies set by the WB to avert risks and abuses that the population and local environment might be subject to as a result of the implementation of any projects funded by the World Bank;

Also, in the context of the policies on transparency being promoted by the WB among the criteria for the funding provided by the WB to various projects, we, the undersigned organizations and a number of citizens affected by the damages emanating from the project of North Giza Electric Power Plant, located in the village of Alqata, Imbaba in Giza Governorate, would like to report the following:

- Since the start, there was no compliance with the required standards with respect to transparency about the negative effects resulting from the project. Furthermore, the mechanisms for consulting the population regarding the implementation of the project in a transparent and clear manner were not applied, rather the procedures of consultation were carried out in a vague and elusive manner with the aim of approving the project without taking the views of the population affected by the project in an effective and real manner,, a matter which pushed us to address the World Bank office in Cairo. We submitted a letter on 05/16/2012 containing the complaints of the people harmed by the implementation of the project, whereupon some officials of the Company contacted us, but after two sessions of dialogue we have not reached anything on the abuses which impacted the population. Meanwhile, we had agreed with company officials in the session of 07/07/2012 to establish a cooperation protocol with the project management to organize for a process to examine the complaints from those harmed by the project and work towards their solution, but this did not happen.

These wrongful actions have resulted in many harms to the people in the vicinity of the project including:

- Damage to agricultural land and crops of farmers in the lands adjacent to the North Giza Electric Power Plant project's area, because of the destruction of the groundwater environment as a result of this project. The draining of the artesian water whose impact was drying up of water wells of the farmers which was reflected in the destruction of farmers crops, also as a result of the drying up of wells the farmers resorted to the water of the agricultural drainage which is not fit to irrigate lands due to the high levels of sodium and chemical elements a matter which negatively reflected on the fertility of the agricultural soil which resulted in a reduction in the productivity of the agricultural land in the short term and

what could possibly be the barrenness of agricultural land in the medium term (see Table 1 listing some of the affected owners of land holdings).

In addition, the draining of artesian water and drying water out of the wells have resulted in drought to the cultivated crops, resulting in a lot of material losses, whether in terms of land or crops (see the reports and complaints received in this regard in the Exhibits Nos. 1 and 2), in addition to the material and technical costs, which the land and crops will need to be restored because of the damage inflicted (see the technical and police reports on drying of the crops and the problems caused to the agricultural land in the Exhibits Nos. 1 and 2). In the same context, the study on the Environmental Impact Study which was prepared by the Engineering Office of the North Giza Company did not address these kinds of problems associated with shortage in artesian water during the project construction.

- Noncompliance by the North Giza Electric Power Company of the requisite standards as regards the necessity of respecting the sanctity of the road to the agricultural drainage canal of the land and the takeover of this road by the Company without compliance to the laws pertaining to this. In this regard, this will have many adverse impacts on the land and water environment for the farmers and will consequently result in substantial material damages. Agricultural water drainage canals are considered a necessity to drain excess water from the soil, and the absence of such canals leads to the deterioration of agricultural land and the reduction of its fertility due to increased salinity in the ground which disturbs the soil alkaline and acid balance. It was thought that the construction of the North Giza project for the production of electric energy would not infringe on the road leading to the only agricultural drainage canal surrounding the agricultural land.
- The construction of a very high fence for the Company and the consequential adverse effects on the land and plants because of holding back the air currents that help in pollination of agricultural crops, as well as blocking sunlight, which will result in rendering the agricultural land barren.
- The damages caused by direct spotlights on the agricultural crops, in addition to effects of dust and waste on cultivated crops.
- No recompense was provided to the tenants who have been evicted from the land on which the project was constructed, after having been evicted from the land on which they have been working for many years, ranging from 10 to 40 years. (See Table No. 2 for the names of tenants and workers who were working in the project land).
- There are many other damages caused by constructing the project including the adverse effects on the owners of artesian wells, used to irrigate the agricultural land due to the draining of artesian water, the consequences of which included

material damage to the lives of the owners of those wells and drought of the farmland that was irrigated from these wells (see Table No. 3 for the names of some affected owners of wells).

- The harms resulting from the operation of the Company in the future, including the company's chimneys and their impact on agricultural land and crops
- The towers that will be built on the agricultural land and the access roads thereto and their destructive impact on the agricultural area.
- The high-voltage lines and the implications thereof to public health.
- Problems arising from the operation of the plant in the future, especially the waste which will be channeled directly into the Nile water and the potential consequent destruction of water and fish resources and denying the farmers and population access to safe drinking water and irrigation at the same time, as well as the future consequential risks related to human health, and also to animal and plant resources.

We, the civil society organizations and a number of affected citizens representing the area's population, hope that the negative effects resulting from this project are reconsidered and action to be taken to redress them in order to save the lives of the people and save the land and the water, flora and fauna resources from the dangers surrounding them.

The signatory organizations:

1. The Egyptian Association for Collective Rights
2. The Egyptian Center for Civil and Legislative Reform
3. The Egyptian Center for Economic and Social Rights
4. Children's Earth Foundation for Human Rights
5. Health and Environmental Development Association
6. Housing and Land Rights Network
7. Arab Non-Governmental Organizations for Development
8. Right to Water Forum in the Arab Region

Exhibit (1)

Al-Qanater Police Station
Wardan Post

On 06/16/2012 at 12:00 Hours
Prepared by Sergeant Sami al-Sayed

4h-Wardan 06/16/2012,

The following was recorded:

Whereas the following was reported through the inspection of the Department of Agricultural Reform in Giza and Abu Ghalib Agricultural Society in the report No. 4h-Wardan 05/20/2012 on the report of Sa'id Masri Mohammed and others from Abu Ghalib that they suffered damages by lack of water cause by the North Cairo Electricity Company. They stated the following:

1. The lands of the complainants are located in the Basin of Sheikh Khairallah in Abu Ghalib district.
2. From the inspection, it was found that the complainants' land is planted with citrus / grapes / peanuts / tomato.
3. From the inspection, it was found that all crops were affected by lack of water. There are some trees with dry branches and the tomato plants clearly show dried leaves with no fruits due to the lack of water. There were no alternative wells for irrigation wells, as their wells were died out of water because the Company has drilled giant wells and withdraw the water from the surrounding area of the complainants' land.
4. During the inspection, the Committee preview has run the artesian irrigation machines but no water came out of the pipes. Also during the inspection, all plants in the cultivated land were not irrigated.
5. The Company has drilled the wells and the crops were affected by the lack of water. The inspection dated 05/28/2012 has been attached after having it initialed.

Thereafter, this report was closed at this time to date and attached to the original report No. 4h-Wardan 05/20/2012 issued by the Police Station under No. 1091 dated 26/05/2012 on the report of Sa'id Masri Mohammed and others for action. 06/16/2012

Exhibit (2)

Agricultural Reform Directorate in Giza

Imbaba District / Abu Ghalib Society

Inspection and case recording report prepared today, Monday 28/05/2012 based on the letter received from the police post of Wardan regarding the complaint of the following people:

1. Ayman Ahmed Mohammed Badawi
2. Khalid Mohmoud Abdul Hamid Harbi
3. Sayed Nasr Mohammed
4. Emad Abdel Halim Abdul Hamid Harbi

Who are reported to have suffered damages caused by North Giza Electricity Company, adjacent to their land and the lack of water due to the drilling of the Company's wells. Accordingly, a committee was formed from the following people to carry out the necessary inspection

1. Eng. Salah Ali Ali - Imbaba District Office
2. Eng. Saber Salah Ahmed - Manager of Abu Ghalib Society
3. Eng. Samir Zaki Allam - Land Protection Officer
4. Mr. Ayman Ahmed Mohammed - Board Member (illegible words)
5. Mr. Marie Abdel Azim - (illegible words)

The Committee moved to the site to carry out the required inspection, through which the following was evident:

1. The lands of the complainants are located in the Basin of Sheikh Khairallah in Abu Ghalib district.
2. From the inspection, it was found that the complainants' land is planted with citrus / grapes / peanuts / tomato.
3. From the inspection, it was found that all crops were affected by lack of water. There are some trees with dry branches and the tomato plants clearly show dried leaves with no fruits due to the lack of water. There were no alternative wells for irrigation wells, as their wells were dried out of water because the Company has drilled giant wells and withdraw the water from the surrounding area of the complainants' land.
4. During the inspection, the Committee preview has run the artesian irrigation machines but no water came out of the pipes. Also during the inspection, all plants in the cultivated land were not irrigated.
5. The Company has drilled the wells and the crops were affected by the lack of water.
05/28/2012

(Signed by the committee members)