

Tools for community-led project monitoring

Documentation and verification of impacts in the Titan Cement project

Introduction When a community faces negative impacts due to a development project, systematic and consistent documentation of verifiable indicators of the impacts can support their efforts to hold development implementers accountable to their own standards, and can lend legitimacy to their advocacy for changes in the project. In the Wadi al-Qamr neighborhood in Western Alexandria, Egypt, residents are systematically documenting impacts and formally registering them through legal processes to support their concerns that a cement plant in their neighborhood is not adhering to national and international standards.

Project description The Alexandria Portland Cement Company plant is located in the Wadi al-Qamr area of Alexandria, Egypt. The International Finance Corporation (IFC) is an investor in the plant through its parent company Titan Egypt and Titan's holding company Alexandria Development Limited.

Project impacts/problem The Alexandria Portland Cement Company (APCC) plant is located adjacent to the neighborhood of Wadi al-Qamr, a community of approximately 60,000 residents, and has operated in the area since the 1940s. As this originally residential area has become more industrialized, residents have faced a number of impacts on their health and quality of life. In 2002, four old cement production kilns were decommissioned and replaced with a fifth kiln. This new kiln was built closer to Wadi al-Qamr residents' homes and businesses and dust and pollutants from this kiln began to have a greater impact on residents. Residents have reported impacts on their health, homes, and livelihoods due to the pollutant dust and vibrations from the plant. Following natural gas shortages and a shift in environmental regulations allowing use of coal as fuel in the cement industry in 2014, the plant in Wadi al-Qamr began the process of

shifting from natural gas to coal as a fuel source. This shift increased residents' concerns regarding the health and pollutant impacts of the plant.

After the construction of the fifth kiln, residents of Wadi al-Qamr organized into a Popular Neighborhood Committee to collectively advocate for a clean and safe environment in which to live, work, and raise their families. This group has used various means including legal cases, local and national media, and peaceful protest to ask for their rights. In addition to these means, the residents of Wadi al-Qamr used the international standards of the International Finance Corporation as an investor in the cement plant to hold APCC accountable for the impacts it has caused. In 2015, with support from several Egyptian civil society organizations, a number of residents of Wadi al-Qamr and members of the popular committee presented their concerns regarding environmental and health impacts officially submitted a complaint to the Compliance Advisor/Ombudsman (CAO), the independent accountability mechanism of the International Finance Corporation. The complaint also presented concerns from former and current employees of the plant regarding the violations of labor laws and standards that they experienced while working for the company.

Methodology To support their efforts and to make their case in a systematic way, residents needed to document the impacts that they were feeling on a day to day basis. Residents noted that when visible black clouds of dust were coming from the kiln smokestack, they would immediately feel the impacts in the air quality when breathing, and dust would collect much more quickly during these hours-long periods when black dust was visible. Residents began to take a picture each time the black dust was visible, and to document the date and time that the picture was taken. Civil society organizations helped to collect and compile the information and pictures and dates, and are asking the company and environmental agency to release the data regarding the plant's emissions levels to cross check the times when residents experienced the highest levels of dust and worst air quality with the levels to ensure that the plant was in compliance with national emissions

limits. Each time residents report the heightened emissions levels, lawyers in the offices of several civil society groups file a case with the local environmental agency.

Residents have also documented their trips to the doctor and hospital to treat respiratory illnesses and cancer which they tie to air pollution that they experience daily.

Workers and former employees of the company have also documented in testimonials and through pictures their experiences of violations of their legal rights as employees, as well as the lack of safe and healthy working conditions in the cement plant. Civil society organizations and unions have supported these workers in organizing and raising these issues in the media and courts.

Limitations

- Lack of technical expertise: Because residents of Wadi al-Qamr and employees of the company do not have access to the technical equipment and expertise necessary to take scientific measurements of the air quality, they have used the means available to them to document the impacts that they see and feel.
- Lack of available information: Information about the plant's emission levels is not made public, and requests by civil society to view this information have not succeeded. Access to this information would enable civil society and residents to cross check their documentation and determine whether the increase in visible black dust corresponds to increased emissions.



Photo credit: وادي القمر غرب اسكندرية Facebook group

Results and lessons learned:

- Organizing as a community gives greater legitimacy and strength to advocacy and demands, and better allows for coordinated, sustained, and systematic documentation of impacts.
 - While it is often not feasible for a community to precisely and scientifically document and measure impacts using highly technical methods, even the simplest forms documentation (such as taking a photograph, or recording a personal testimony) lend great legitimacy and strength to communities' claims of harm. Communities that are interacting with and facing the direct impacts of a development project on a regular basis are the best placed to undertake monitoring and systematic documentation of these impacts.
- Partnering with civil society organizations at the local, national, and international levels can help communities to extend the impact of their documentation and to access technical information and expertise that can be cross checked with communities' data. Civil society organizations can also help communities to access legal mechanisms, media, and hold national and international development implementers accountable to their own standards.

This is one of a series of examples of successful community-led monitoring of World Bank Group projects that Bank Information Center has documented. Please visit BIC's website for tools and resources about how communities can work together to claim their rights in development projects.

www.bankinformationcenter.org/monitoring