



13-D Environmental Inspection

Introduction

Environmental inspection aims at reinforcing and enhancing both environmental state and public health. Pollution resulting from industrial facilities has adverse impacts not only on environment but also on human health.

Environmental inspection includes several linked aspects including planning, implementation measures and information management.

In 2004, a progressive and a development upturn have taken place in environmental inspection tasks and activities in Egypt including the following:

- Enforcing all types of facilities to apply law 4/1994 articles and provisions by filing lawsuits to apply legal penalties; (violations, misdemeanors, criminal acts) on violating facilities;
- Supporting industrial facilities environmental performance development by providing them with guidance to use EEAA technical and financial support mechanisms in order to provide them with assistance in many fields including waste control and treatment, efficient treatment operations, application of self-monitoring systems, and at-source waste minimization programs.
- Encouraging different industrial facilities to submit environmental compliance plans to the Ministry and EEAA with time schedules, and the evaluation and following-up of the implementation of such plans through the General Department for Inspection. About 15 large industrial facilities have submitted environmental compliance action plans (CAPs) until the end of 2004.
- Coordinating with EEAA Air Quality Sector to monitor cement factories

emissions all over the republic, undertaking regular environmental inspection and taking legal pursuit measures against violators.

- Participating in the development of sectoral environmental inspection guidelines in cooperation with the Environmental Pollution Abatement Project (EPAP);
- Cooperating with the Egyptian Environmental Policies Program (EEPP) for issuing the policy, guidelines and procedures for environmental inspection;
- Participating in the elaboration of proposals for environmental compliance executive regulation to be realistic and in line with environmental laws;
- Developing a proposal for upgrading the role of the General Department for Environmental Inspection during the coming phase to maximize the tangible outcomes of environmental inspection activities; The proposal should include the Department's role in developing EEAA financial resources through claiming reasonable compensations from the different facilities for remediating environmental impacts resulting from their violations.
- Participating in conferences, seminars and international fora by presenting different working papers and research; The Department has actively participated in the African-Arab Forum, International Conference on "Engineering and the Environment" held at the Military Technical College, in addition to its permanent participation in the World Conference on Environment held in Cairo, as well as the National and World Environment Day.
- Coordinating and cooperating with the EEAA Training Department in training environmental EMU staff at governorate level. To date, nearly 200 em-

ployees were trained. Training included the development of scientific material, giving lectures in the different industrial sectors and on important environmental matters. Training was also implemented in different industrial facilities for the heads of production lines and environmental staff at large industrial facilities.

- Undertaking specialized EIA studies as part of the Arab League/EEAA cooperation programs.
- Entering data of about 2,150 facilities in the Environmental Inspection database (IPIS) and offering access to information to all EEAA different sectors and department.

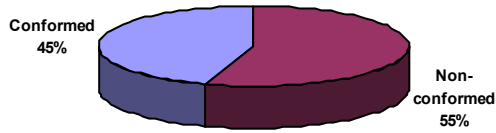
Environmental Compliance Basic Indicators:

- Environmental Status Register.
- Hazardous substances management.
- Hazardous waste management.
- Hazardous waste registry.
- Solid waste management.
- Gaseous emissions.
- Work environment pollutants.
- Wastewater .

Environmental Legal Compliance Indicator

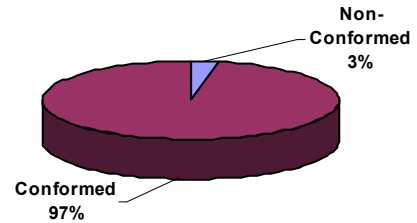
Results of these indicators based on inspections undertaken during 2004 can be briefed in the following graphs:

Environmental Status Register Index



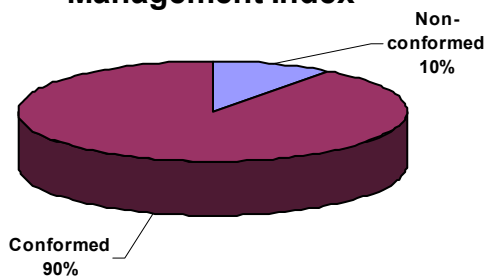
About 45 % of the facilities are not in violation as such facilities are in the process of developing their environmental registers, which are submitted to EEAA. A high percentage of these facilities have been previously inspected and their environmental registers developed accordingly.

Hazardous Material Management Index



It is clear that 3% are in violation due to the absence of permits to handle hazardous substances from competent authorities.

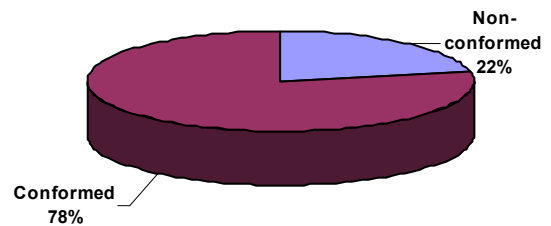
Hazardous Waste Management Index



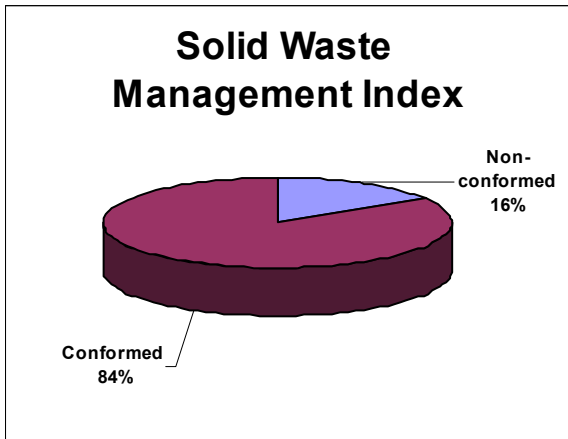
It is noticeable that 90% are not in violation due to waste disposal through:

1. Sanitary landfill in Nasereya (Alexandria)
2. Disposal in cement kilns (Alkaline)
3. Temporary storage
4. Minimization from the source
5. Recycling

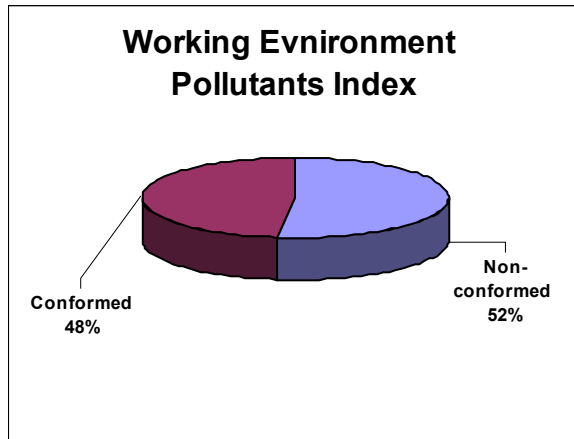
Hazardous Waste Register Index



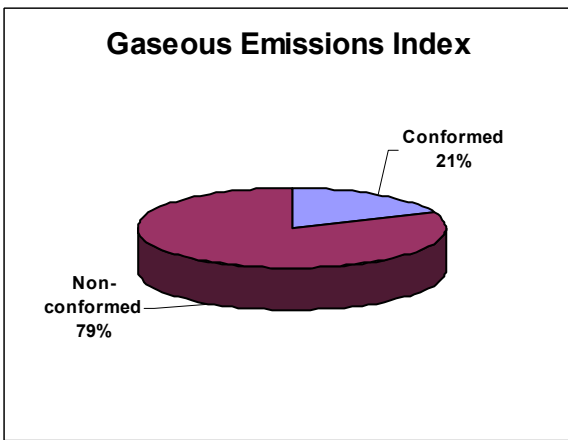
It is clear that 78 % are not in violation as a large number of facilities have no hazardous wastes and other fertilizers has also been previously inspected, and consequently have developed hazardous wastes registers to avoid severe penalties; some facilities have also submitted their hazardous wastes registers after inspection and before forwarding their violation reports to the public prosecutor.



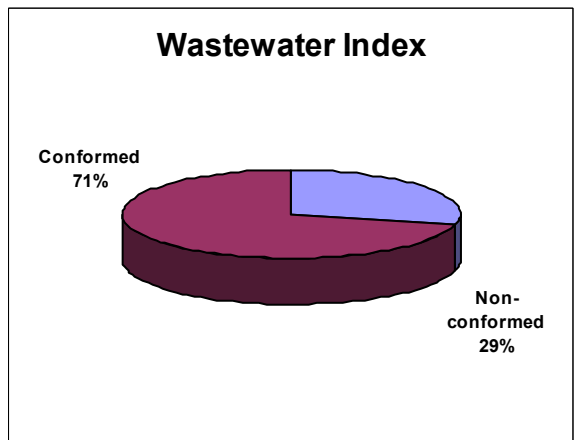
It is clear that a percentage of 84% is compliant due to contracts made between facilities and EMUs or any competent authorities to remove wastes, as the system of removing and transporting wastes from governorates exists since a long time.



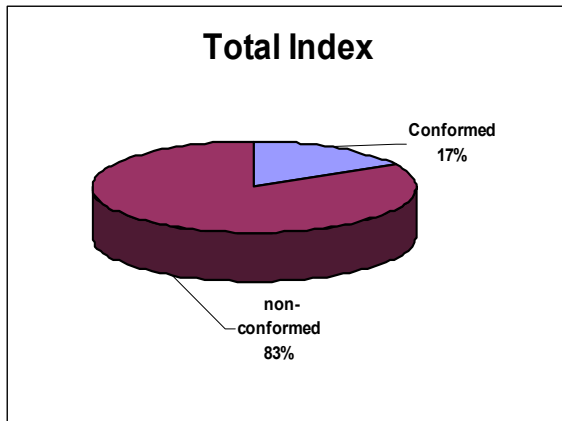
It is clear that a percentage of 48% is compliant due to the fact that a high percentage of facilities are non-compliant as regards working environment pollutants which effect on workers' health (noise, respirable particulate matter, humidity and temperature) and absence of commitment with PPE (Personal Protection Equipment).



79% is compliant as some facilities generating gaseous emissions are compliant with legal standards due to the use of filters for washing gases. Other factories use liquid or gaseous fuel as an energy source but use generated power from electric supply.



It is clear that a percentage of 71% is conformed because a large number of facilities drain through the main network, others do not have industrial drainage, while for those who drains int. the Nile or any of its branches, their drainage pollutants are with the legal limits.

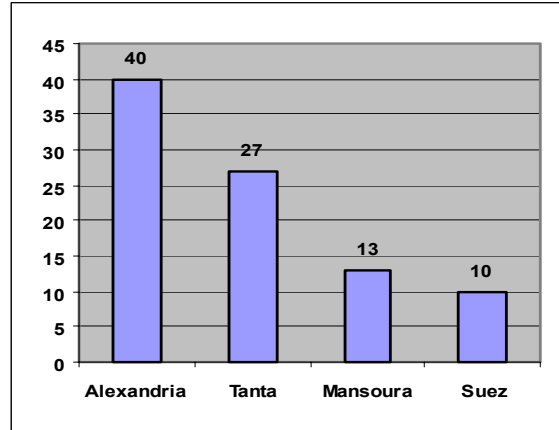


It is clear that a percentage of 17% has been approved for the following reasons:

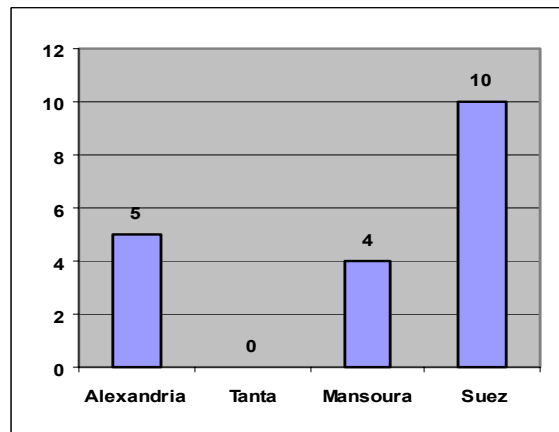
1. The absence of any non-conformance; according to the Environment Law 4/1994.
2. Conciliation regarding non-conformance.
3. A decree by HE the Minister or EEAA CEO upon a petition by the facility.
4. The full termination of the facility or its temporal termination during inspection.

In 2004, Environmental Inspection General Department has inspected about 950 facilities in addition to more than 500 other facilities in participation with Citizen Service Department distributed on the different sectors. (Industrial, tourism, services and health sectors).

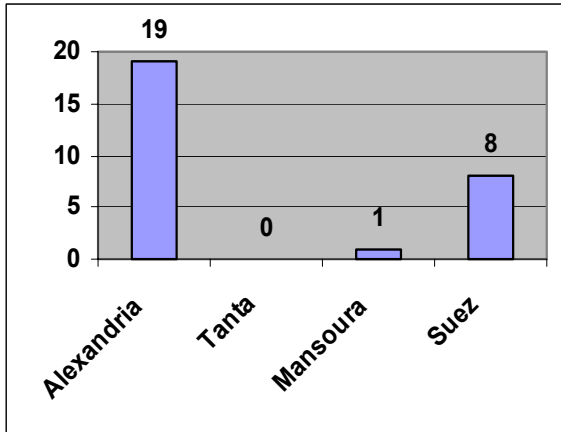
Inspection by Central Department for Branches Affairs (CDBA)



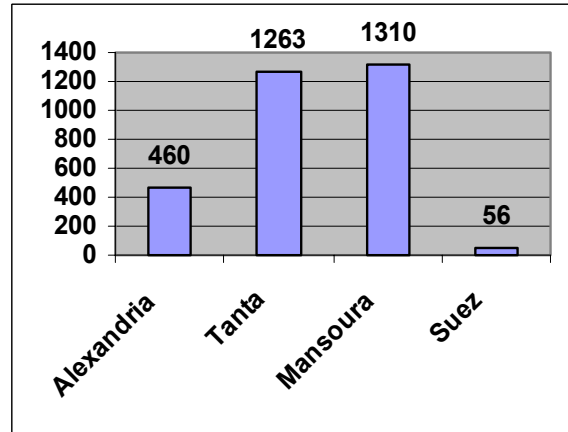
**Inspecting industrial facilities
From 1/7/2004 till 31/12/2004**



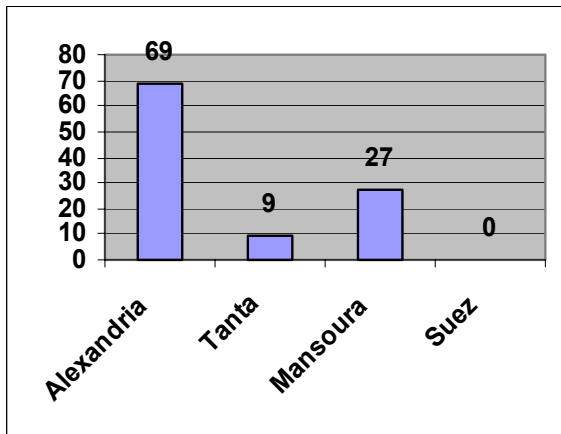
**Inspecting service sites
From 1/7/2004 till 31/12/2004**



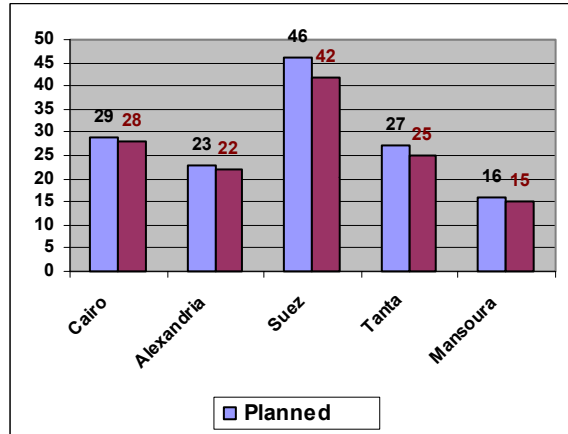
Inspecting tourist, entertainment and resort facilities From 1/7/2004 till 31/12/2004



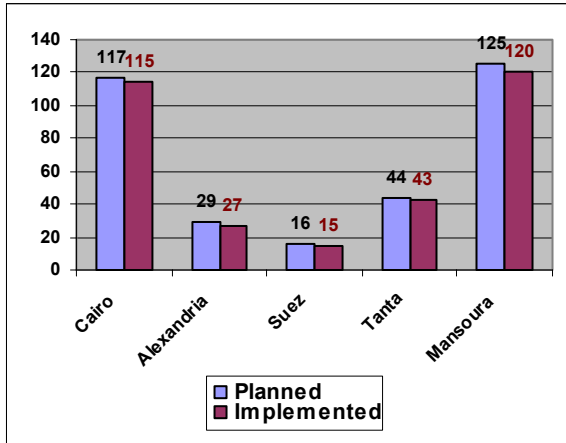
EIA Review (Form A) From 1/7/2004 till 31/12/2004



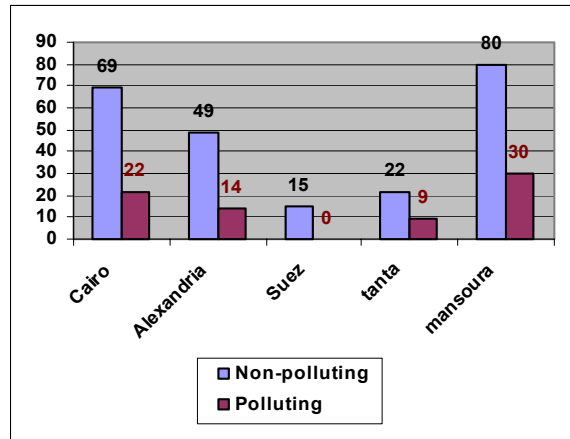
Inspecting workshops and small enterprises From 1/7/2004 till 31/12/2004



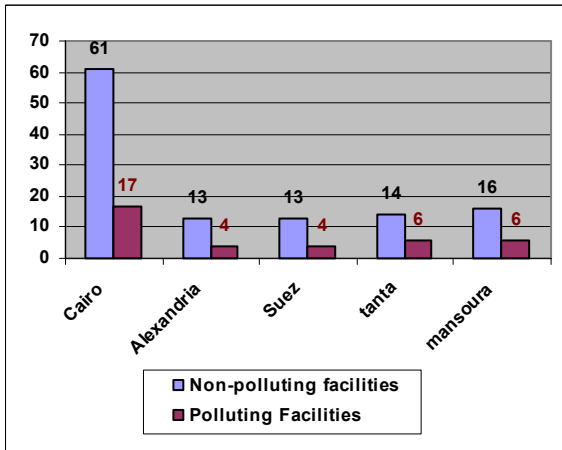
The amount of achievement with respect to plan relevant to water quality From 1/7/2004 till 31/12/2004



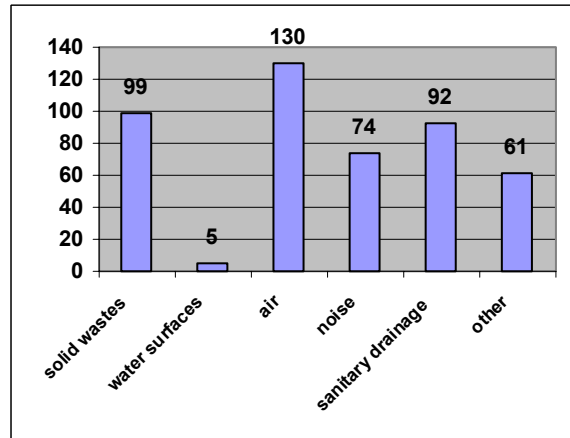
The amount of achievement with respect to plan relevant to air quality From 1/7/2004 till 31/12/2004



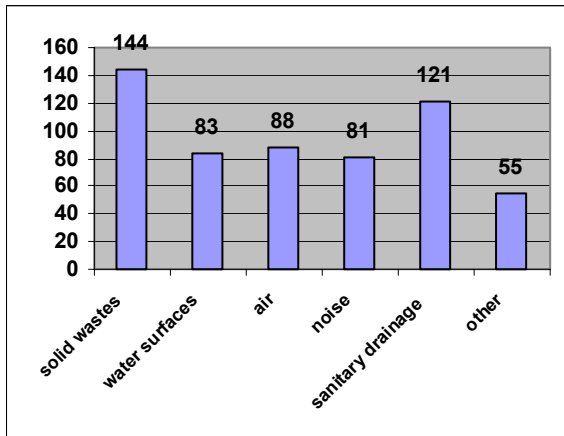
Noise-polluting facilities From 1/7/2004 till 31/12/2004



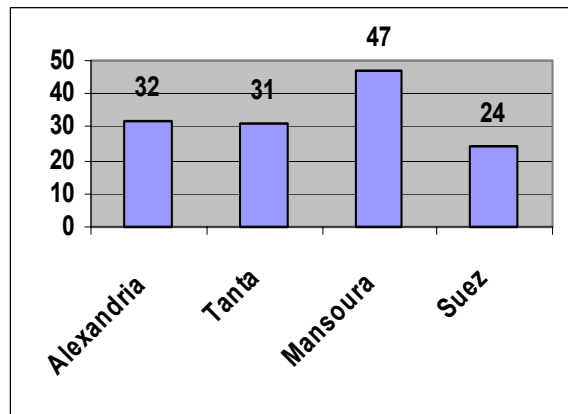
Air polluting facilities From 1/7/2004 till 31/12/2004



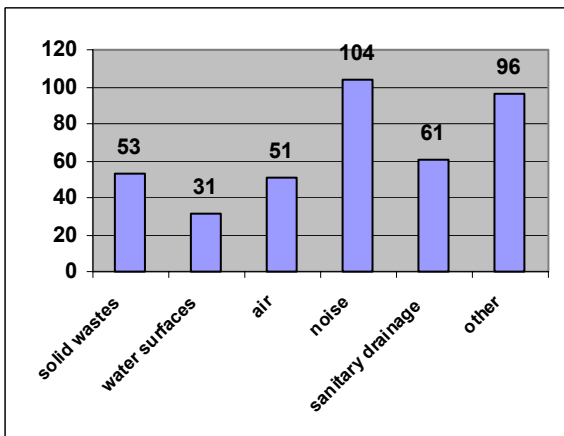
Complaints submitted by citizens in Alexandria RBO From 1/7/2004 till 31/12/2004



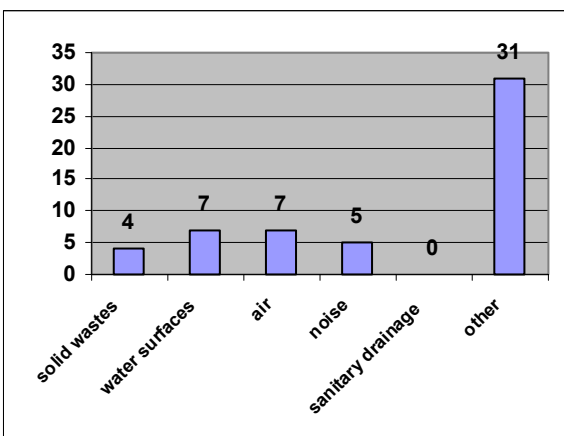
Complaints submitted by citizens in Tanta RBO From 1/7/2004 till 31/12/2004



Violation Reports for Environmentally Polluting Facilities from 1/7/2004 – 31/12/2004



Complaints submitted by citizens in Mansoura RBO From 1/7/2004 till 31/12/2004



Complaints submitted by citizens in Suez RBO From 1/7/2004 till 31/12/2004

Post-Inspection Measures

EEEEAA role is not limited to implementing environmental inspection and referring reports against violating facilities to the public prosecution (the Penalty part), but extends to treatment and prevention, which complements environmental inspection.

Such treatment and prevention aspects can be summarized as follows:

- Instructing environmentally violating facilities to submit to EEEAA specific time environmental compliance plans, which are regularly monitored.
- Instructing environmentally violating facilities (based on their inspection reports) to one of the donor projects comprising an element for offering technical or financial assistance to facilities in order to comply environmentally.
- Contacting the competent administrative authorities concerned with environmental violations of facilities under inspection in order to make such facilities accountable and responsible for addressing their violations by taking the necessary legal and administrative measures against them.