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GAP ANALYSIS OF THE EGYPTIAN POLICY FRAMEWORK TO SUPPORT THE TRANSFORMATION OF INDUSTRIAL PARKS TO ECO-INDUSTRIAL PARKS

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Executive Summary

UNIDO's Egypt Eco-Industrial Parks (EIPs) Project is part of the Global Eco-Industrial Park Programme (GEIPP) funded by the Government of Switzerland through its State Secretariat of Economic Affairs (SECO). The overall objective of the GEIPP is to demonstrate the viability and benefits of the eco-industrial park approach. In line with this objective, the Egypt intervention focuses on mainstreaming EIP in relevant Egyptian policy and regulations and implementing EIP approaches in selected industrial parks.

The objective of the study is to review existing strategies, laws, and regulations to identify policy gaps that may hamper the implementation of EIP approaches. Such information will facilitate the better design of the national EIP framework.

There are currently 147 industrial zones (or industrial parks) in Egypt¹, which vary greatly in scale, characteristics, and governance structure. Several industrial zones follow special fiscal and tax regimes (e.g. special economic zones, investment zones and free zones) that define the investment and industrial development conditions in these zones as well as their governance structure. Most large, existing industrial zones are managed by the governorates. Other important managing entities are the New Urban Communities Authority (NUCA), the General Authority for Investments (GAFI), the General Authority for Suez Canal Economic Zone (SCZONE), and the Ministry of Trade and Industry (MoTI)/Industrial Development Agency (IDA).

Egypt's First Updated Nationally Determined Contributions Report notes that the Government of Egypt intends to promote the EIP concept to scale up resource efficiency through the improvement of economic, environmental, and social performances of businesses and the creation of green industries (such as recycling and renewable energy) towards inclusive and sustainable industrial development. This document confirms the existence of a strong political will in Egypt to mainstream the concept of EIPs. Several national strategies (e.g. Egypt Vision 2030, National Climate National Strategy 2050, Industry and Trade Development Strategy and Integrated Sustainable Energy Strategy 2035) could be further opportunities to anchor EIP development in Egypt.

The ongoing industrial growth in Egypt has been accompanied by the reform of the regulatory framework governing the industrial sector. Law no. 159 of 1981 is the mean of legal presence in the Egyptian Industrial business environment. The most notable law in this reform is Law 15/2017, which streamlines industrial licensing and establishes the IDA as a one-stop shop for all licensing needs of industries. In addition to the reform, industrial development is being supported further by the creation of fiscal and non-fiscal investment incentives under several special investment regimes. The new Investment Law 72/2017 and the Special Economic Zones Law 83/2002 regulate the investment conditions and the governance structure for all investments and stipulate special terms for industrial zones that are categorized as investment zones, free zones, and economic zones. Moreover, the new MSMEs Law 152/2020 introduces a unified definition of MSMEs and provides some incentives such as business incubators and accelerators for MSMEs and entrepreneurs.

In Egypt, two main laws regulate the environmental performance of industrial parks:

- the Environment Law 4/1994 and its amendment Law 9/2009 and
- the new Waste Management Law 202/2020 which entered into force in 2021. According to the Waste Management Law, industrial zones, free zones, investment

¹ See Annex II.

zones and IDA need to submit an integrated plan for the management of industrial wastes to be endorsed by the Waste Management Regulatory Authority (WMRA).

In general, EIPs are not mentioned within the Egyptian regulatory framework. The legislations focus mainly on the tools for enforcing compliance, and a framework that provides incentives for companies to move beyond compliance to implement RECP technologies and practices and upscale to EIPs is notably absent.

Numerous donor-funded energy and resource efficiency initiatives targeting the industrial sector in Egypt have been implemented since the 1990s. These projects were successful at creating awareness, building capacities, and providing some demonstration projects on RECP and related topics but they were not enough to encourage wide-scale RECP uptake by the industrial sector. The most notable projects in this area are:

- a) the Environmentally Friendly New Industrial Cities program (NICs),
- b) the Integrated Industrial Solid Waste Management in Egypt project (IISWM),
- c) Robbiki Leather City,
- d) the Industrial Waste Management and SME Entrepreneurship Hub (IWEX),
- e) The GIZ Job Partnerships and SME Promotion in Egypt (JP-SME),
- f) The World Bank Upper Egypt Local Development Program and
- g) UNIDO projects like the establishment of Egypt National Cleaner Production Center (Austria and SECO), MEDTEST and SWITCHMED (EU), Industrial Energy Efficiency (GEF), Solar Heating for Industrial Process (GEF) and Industrial Motor Efficiency (GEF).

The Central Bank of Egypt (CBE) has launched a flagship initiative for SME finance since 2015. An amount of EGP 213 billion has been offered to commercial banks and other financial service providers to provide loans to SMEs at a 5% interest rate. The CBE also obliged banks to allocate 20% of their portfolio to the SME sector. The data refer to that the granting credit facilities provided to SMEs, from 2015 to 2020, amounted to EGP 213 billion; 81% of this amount has already been provided to 126,000 SMEs in the industrial, agricultural, and service sectors, in addition to more than 900,000 micro clients.

In addition to that, several financial institutions have provided sustainable energy and resource efficiency financing to the industrial sector in Egypt (e.g. Industrial Energy Efficiency Fund (UNIDO, EEAA, RECREE), Green Economy Financing Facility (GEFF, EBRD), and the Egyptian Pollution Abatement Programme Phase three (EPAP III)) in addition to international climate finance under Egypt's commitments to mitigate climate change. The IZ/IP operators and resident firms could leverage several available financial mechanisms to support the implementation of the RECP and EIP interventions.

This study has identified several policy gaps which hinder the promotion of EIPs in Egypt:

- i. Park Management Performance: Lack of differentiation between regulatory, development and operation roles; lack of park management services and lack of monitoring system for evaluating park performance.
- ii. Environmental Performance: Restrictions on solar power generation and inefficient institutional framework for creating industrial symbiosis networks.
- iii. Social Performance: Poor working conditions of some informal workers; low legal protections from arbitrary dismissal; obstacles to the right to organize; and gender-blind industrial policies and strategies.

- iv. Economic Performance: Lack of measures to address technology upgrading of industrial zones; weak linkages between MSME suppliers, large corporations and FDIs; high regional disparities of EIPs; and lack of incentives for fostering green industries.

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Acronyms

AfDB	African Development Bank
CAA	Competent Administrative Authority
CBE	Central Bank of Egypt
CID	Cairo for Investment and Development
CP	Cleaner Production
ECO	Environmental Compliance and Sustainable Development
EBRD	European Bank for Reconstruction and Development
EDA	Export Development Authority
EEAA	Egyptian Environmental Affairs Agency
EIA	Environmental Impact Assessment
EEIF	Egyptian Environment Initiatives Fund
EEPP/EP3	Egyptian Environmental Policy Programme
EIB	European Investment Bank
EIP	Eco-industrial park
EFF	Extended Fund Facility
ENCPC	Egypt National Cleaner Production Centre
EnMA	Energy Management Assistance
EPAP	Egyptian Pollution Abatement Programme
EPR	Extended Producer Responsibility
EU	European Union
FEI	Federation of Egyptian Industries
GAFI	General Authority for Investment and Free Zones
GEFF	Green Economy Financing Facility
GEIPP	Global Eco-Industrial Parks Programme
GIZ	The Deutsche Gesellschaft für Internationale Zusammenarbeit
GNI	Gross National Income
IDA	Industrial Development Authority
IDC	Industrial Development Company
IFC	International Financial Corporation
IISWM	Integrated Industrial Solid Waste Management
IMC	Industrial Modernization Centre

IMF	International Monetary Fund
IMPA	Industrial and Mining Projects Authority
IWEX	Industrial Waste Management and SME Entrepreneurship Hub
IP	Industrial park
ITIDA	Information Technology Industry Development Agency
IZ	Industrial zone
KPI	Key performance indicators
LEDS	Low emission development strategies
MCIT	Ministry of Communications and Information Technology
MHT	Medium and high-tech
MPED	Ministry of Planning and Economic Development
MoE	Ministry of Environment
MoTI	Ministry of Trade and Industry
MoIC	Ministry of International Cooperation
MSMEDA	Micro, Small and Medium Enterprise Development Agency
MVA	Manufacturing Value Added
NAMAS	Nationally Appropriate Mitigation Actions
NDC	Nationally Determined Contribution
NIC	New Industrial Cities
NTRA	National Telecom Regulatory Authority
NUCA	New Urban Communities Authority
PCP	Programme for Country Partnership
RECP	Resource Efficiency and Cleaner Production
RECREE	Regional Center for Renewable Energy and Energy Efficiency
SCZONE	Suez Canal Economic Zone
SEAM	Support for Environmental Assessment and Management
SECO	Swiss State Secretariat for Economic Affairs
SME	Small and Medium-sized Enterprise
SWH	Solar Water Heating
UNIDO	United Nations Industrial Development Organization
UNFCCC	United Nations Framework Convention on Climate Change
VAT	Value Added Tax
WB	World Bank Group
WMRA	Waste Management Regulatory Authority



1. INTRODUCTION

1. Introduction

UNIDO's Egypt Eco-Industrial Parks Project (GEIPP-Egypt) is part of the Global Eco-Industrial Parks Programme (GEIPP) funded by the Government of Switzerland through its State Secretariat of Economic Affairs (SECO). The overall objective of the GEIPP is to demonstrate the viability and benefits of the eco-industrial park approach. In line with this objective, the Egypt intervention focuses on mainstreaming EIP in relevant Egyptian policy and regulations and implementing EIP approaches in selected pilot EIPs.

The specific expected outcome of the project is an improved environmental, economic and social performance of industries in Egypt through the implementation of EIP approaches in selected pilot industrial parks. While the project will provide technical assistance to a selected group of parks it aims to reach a large number of industries at a national level through awareness-raising and capacity-building activities. Through these actions, the aim is to increase the role of EIP in environmental, industrial, and other relevant policies.

This study is conducted as part of the GEIPP Egypt project. The objective of the study is to review existing laws and regulations to identify gaps hindering the integration of EIPs into sustainable industrial policy planning and implementation. Such information will facilitate the better design of the national EIP framework, including various technical assistance projects and policy programmes. Regulatory mapping and analysis can help policymakers identify regulatory barriers that can hinder the implementation of the national EIP framework, including:

- » A lack of appropriate and enforceable policies and regulations to encourage EIPs;
- » Potential conflicts between existing regulations and policy initiatives;
- » A lack of transparency surrounding industrial regulation and enforcement; and
- » The limited ability of stakeholders to transpose privileged regulatory frameworks into industrial parks

The term "industrial park" has been adopted in this report, despite its infrequent usage within the Egyptian context, to encompass also "industrial zones" (IZs), which is the official terminology used by the IDA (Industrial Development Authority).

2. METHODOLOGY



2. Methodology

The research of this report is based on in-depth interviews and document analysis. Primary data used in the first version of this report were obtained through stakeholders' interviews between September and October 2019, and a stakeholder consultation workshop held in November 2019. In this second version of the report, several interviews were conducted from June-August 2022. The main stakeholders interviewed were representatives from the Industrial Development Authority (IDA), the General Authority for Investment (GAFI), the Egyptian Environmental Affairs Agency (EEAA) and private industrial park developers². Interviewing these parties helped paint a vivid picture of their perspectives on policy gaps of EIPs in Egypt.

Semi-structured interviews were conducted, guided by the UNIDO, WBG and GIZ joint publication "A Practitioner's Handbook for Eco-Industrial Parks: Implementing the International EIP Framework". The scope of the analysis covers the four categories of EIP performance (i.e. park management, environmental, social and economic performances). Asking open-ended questions, follow-up questions and probes were used during the interviews to get a clearer understanding of existing gaps. Moreover, the research team paid attention to triangulation to be able to see problems from different perspectives.

Additionally, document analysis was one of the primary research methods used. The research team reviewed different documents published by the government, private sector and international organizations to complement the data needed for the examination. Information concerning policies, laws, regulations and other related studies were collected from the internet and national stakeholders.

² For the complete list of stakeholders consulted refer to Annex I.



3. ECONOMIC AND INDUSTRIAL PERFORMANCE



3. Economic and Industrial Performance

This section gives an overview of the economic and industrial development of Egypt through the aggregation of relevant national statistics and indicators. This is important to understand the context that affects the performance of industrial parks in Egypt.

3.1 Egypt Economic Context

Egypt is still on track to record year-on-year growth, however, the war in Ukraine and COVID-19 might have negative effects on the economy. It is expected that economic growth will reach 5.5% in FY2021/2022, up from 3.3% in FY2020/2021, which reflects the strong performance in the first half of year³. Nevertheless, economic activity will be adversely affected by the repercussions of the war in Ukraine. Thus, growth is expected to slightly decline to 5% in FY2022/2023⁴. Inflation is foreseen to exceed the target of the inflation rate set by the CBEs (7 ±2 %)⁵.

Prior to the unexpected shocks that faced the global economy, economic activity in Egypt was recovering strongly, although inflation was on the rise and pressures on external accounts were building. The Egyptian economy has gradually recovered from the repercussions of the 2011 political turmoil, reflected in the 5.3% annual growth of Gross Domestic Product (GDP) in 2018 in contrast with the 1.8 - 2.2% GDP growth in the period between 2011 and 2013⁶. Egypt's per capita gross national income (GNI) has seen a twofold increase from the 2008 GNI per capita of USD1,400 to USD2,800 in 2018. In November 2016, Egypt initiated a substantial economic reform supported by the International Monetary Fund's (IMF) Extended Fund Facility (EFF), which was concluded in July 2019. The key measures of the economic reform were the liberalization of the exchange rate regime, which resulted in a significant depreciation of the value of the Egyptian Pound (EGP) in 2016, the phasing out of energy subsidies, and the introduction of the value-added tax (VAT). According to the IMF, the reform achieved its overall goals of macroeconomic stabilization and recovery of economic growth. The annual GDP growth is expected to continue its steady increase in the next few years to reach 6% in 2022, while the high inflation rates averaging 23% seen in 2017 and 2018 are expected to decrease to single digits in 2023 (IMF, 2019)⁷.

In response to COVID-19 and the conflict in Ukraine, the Government of Egypt announced several measures to mitigate the negative impacts of these crises. The Central Bank of Egypt (CBE) is pursuing a depreciation policy for the exchange rate by around 16% to reduce the widening net exports deficit⁸. At the same time, the government is adopting a rescue package amounting to EGP 130 billion (1.6% of FY2022/23 GDP) to reduce the impact of rising

³ World Bank <https://www.worldbank.org/en/country/egypt/overview> (accessed on August 25, 2022)

⁴ Ibid

⁵ Ibid

⁶ Ibid

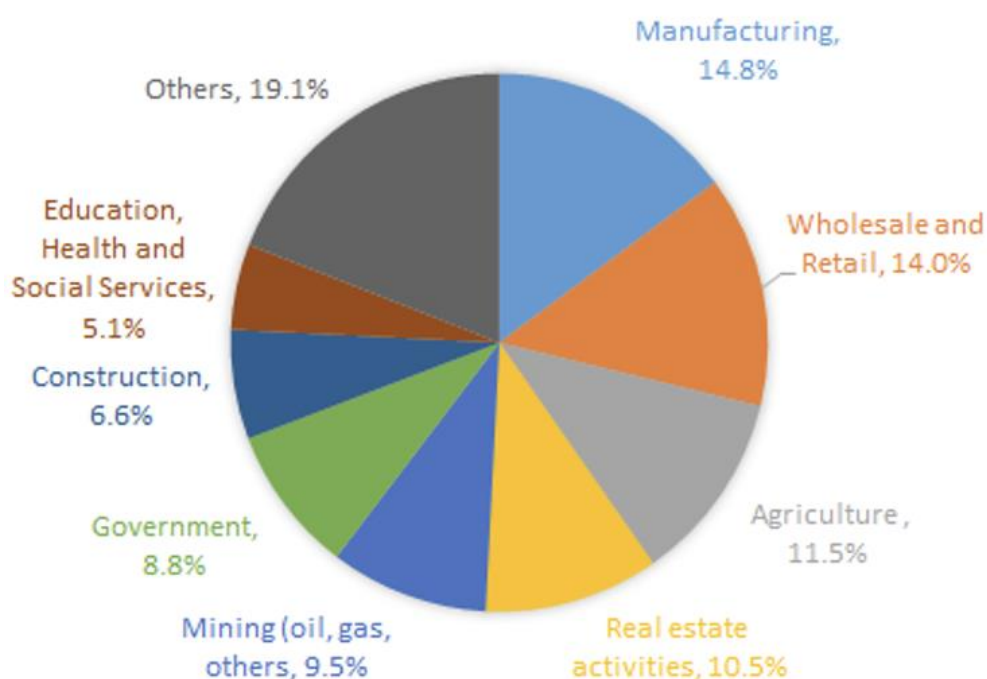
⁷ International Monetary Fund- Egypt Country profile, <https://www.imf.org/en/Countries/EGY>, retrieved 02 October 2019

⁸ World Bank <https://www.worldbank.org/en/country/egypt/overview> (accessed on August 25, 2022)

prices by increasing public sector wages and pensions, approving new tax measures, and expanding coverage of the cash transfer programmes, among other measures⁹.

The Egyptian economy is considerably diversified, with the largest six sectors contributing between 8 - 14% of the total national GDP respectively, as indicated in Figure 1. Manufacturing is Egypt's largest sector, contributing alone 14.8% of the total GDP for the fiscal year 2020/2021 (CAPMAS, 2021). Other important sectors are trade, agriculture, real estate, and mining (including oil and gas), which together with the manufacturing sector generated more than 60.4% of the national GDP in 2020/2021.

Figure 1. Contribution to GDP by Sector in Egypt (2020/2021)



3.2 Industrial Development Status and Trends

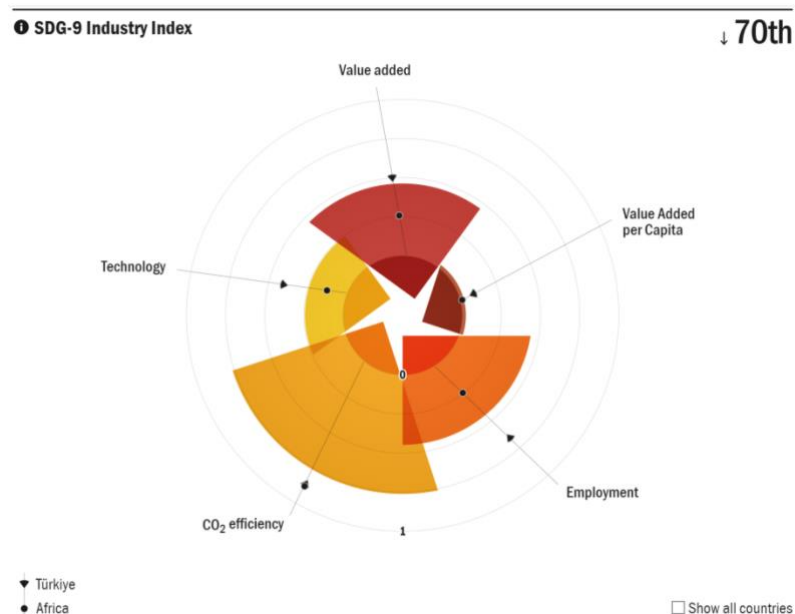
SDG-9 Industry Index

In 2000, Egypt ranked 62nd in the SDG-9 Industry Index. However, the country has since lost eight positions in the ranking, currently occupying 70th place (Figure 2). On the other hand, other countries in the region have been making better positions such as Turkey (31st) and Tunisia (58th)¹⁰. The individual indicators of the SDG9 Industry Index indicate that Egypt still boasts manufacturing value added and employment shares that are far above the African average. However, when looking at manufacturing value added (MVA) per capita, Egypt's performance is significantly less impressive. On CO₂ efficiency, the country falls short of other African countries, likely due to the strong presence of the oil and gas industry. While Egypt's share of medium- and high-tech (MHT) industries is well above the African average, it is substantially lower than that of the regional comparator country Turkey.

⁹ Ibid

¹⁰ UNIDO Industrial Analytics Platform <https://iap.unido.org/>

Figure 2. SDG-9 Industry Index for Egypt in Comparison to Turkey and Africa



Source: UNIDO Industrial Analytics Platform <https://iap.unido.org/data/sdg-9-industry?p=EGY>

Manufacturing Value Added (MVA)

Both the share of MVA in GDP as well as MVA per capita can be used to analyze the impact of EIPs on the economy. The contribution of the manufacturing sector to Egypt's economy has declined over the last two decades, with Egypt's MVA/GDP decreasing from 16.5% in 2000 to 15.3% in 2019 (Figure 3). Although the MVA/GDP of Turkey and the Middle- Income Industrial Countries were lower than Egypt in 2000, they succeeded to improve their MVA to reach 22.5% and 16.3%, respectively. MVA per capita in Egypt has shown moderate growth since 2000 (Figure 3). Although Egypt increased its MVA per capita by 31 per cent over the period 2000-2019, growth was sluggish compared to other Middle-Income Industrial Countries. This suggests that the country needs to focus on switching to higher value-adding activities, thereby increasing the contribution of manufacturing to overall economic growth.

Employment within the Manufacturing Sector

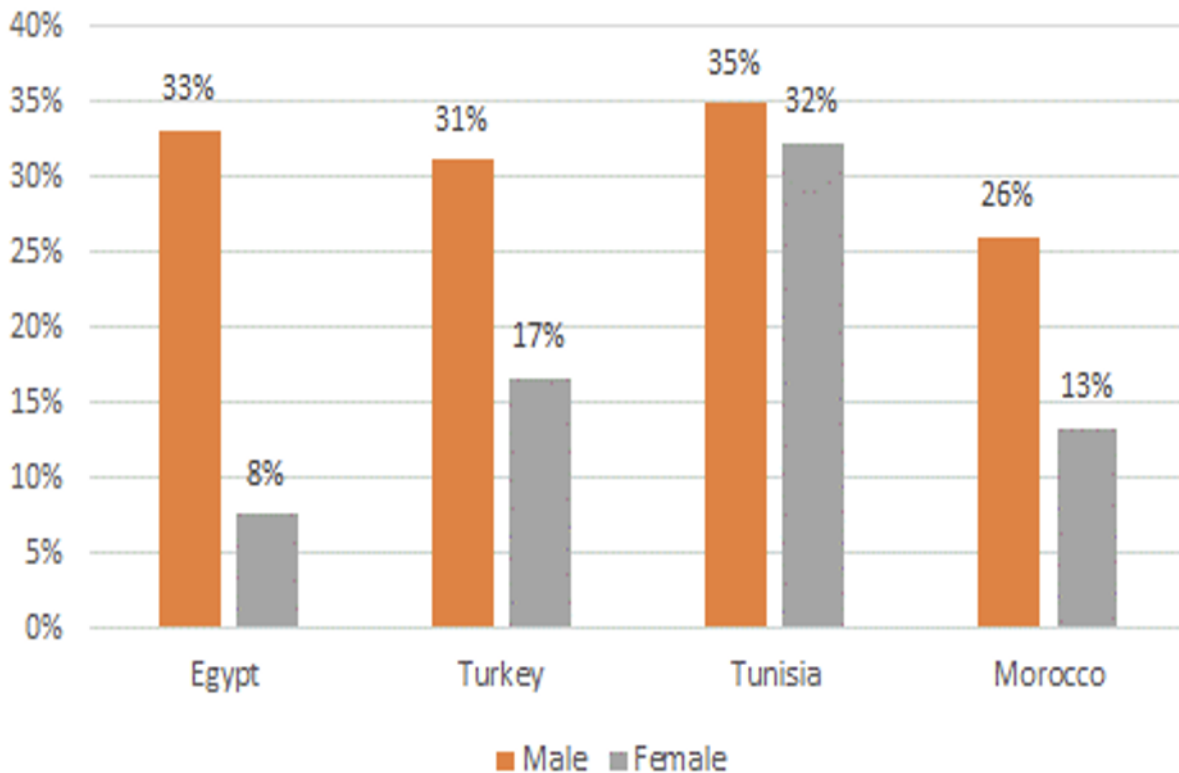
Industrial parks can create employment opportunities in the formal economy. Increasing the number of employment opportunities is a prerequisite for inclusive industrialization. Inclusiveness also means that all segments of society have access to the same opportunities for employment. Figure (3) shows that the manufacturing sector in Egypt plays a significant role by providing 13% of total employment and that its overall inclusiveness is comparable to Middle-Income Industrial Countries. There is a persistent gender imbalance in employment in the industrial sector in Egypt. Male employment in the industrial sector accounts for 33% of total male employment, while female employment in the industry represents only 8% of total female employment (Figure 4). The data thus suggest that Egypt is lagging behind benchmark countries when it comes to female employment in industry, with Tunisia at 32%, Turkey at 17% and Morocco at 13%.

Figure 3. Manufacturing value added per capita and Employment in the manufacturing sector



Source: UNIDO Industrial Analytics Platform <https://iap.unido.org/data/sdg-9-industry?p=EGY&s=TUR>

Figure 4. Manufacturing sector employment disaggregated by gender (2021)



Source: Compiled by the author using data from ILO Statistics database

Technological Capabilities and Sustainability of the Manufacturing Sector

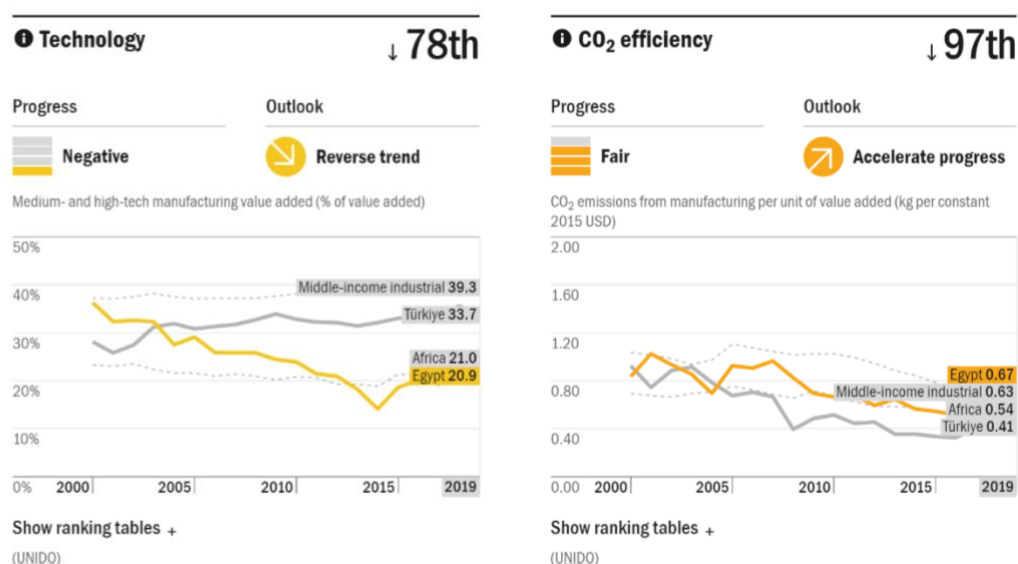
One of the key economic drivers of EIPs is technology upgrading by stimulating foreign direct investment (FDI) which leads to growth in the role of technology within activities and a progressive shift from low to medium and high-tech (MHT) industries and eventually

leading to greater MVA and MVA per capita. The share of MHT industries has decreased in Egypt. It dropped from 36% in 2000 to 20.9% in 2019 (Figure 5). This is a very notable change in the structure of Egypt's manufacturing sector composition. The contribution of the oil and gas sector, which is considered a medium tech industry, to MVA, grew significantly from 4.9% in 2000 to 22.1% in 2019, while the share of MVA by the chemicals industries, generally considered MHT industry, declined from 20.8% in 2000 to 12.9% in 2019¹¹. This change might explain the decline in MHT industries in Egypt. This comes in sharp contrast to the benchmark analyses which suggest that the shares of MHT industries are relatively high across Middle-Income Industrial Countries (39.3%).

An additional vital indicator that gives insights into the sustainability of the industrial sector is its emission intensity. For inclusive and sustainable industrial development, a country needs to introduce specific measures to make manufacturing production cleaner. To achieve inclusive and sustainable industrial development, focusing on the promotion of competitiveness alone would not be sufficient.

Egypt achieved slight reductions in emission intensity of the manufacturing sector from 1.13 kg of CO₂ in 2000 to 0.67 kg in 2019 (Figure 5). Some possible explanations for this improvement include reductions in energy subsidies and energy shortages during 2011-2015 which encouraged some energy-intensive industries to apply energy efficiency measures and shift to renewable energy in some processes. In addition, some credit lines offered by financial institutions may have encouraged industrial firms to increase their compliance with environmental laws, while development projects implemented by international organizations in the field of energy efficiency and cleaner production may have further encouraged such trends. However, Egypt still falls short of other Middle-Income Industrial Countries, African countries, and Turkey.

Figure 5. Medium-and High-Tech (MHT) manufacturing value-added and CO₂ emissions



Source: UNIDO Industrial Analytics Platform <https://iap.unido.org/data/sdg-9-industry?p=EGY&s=TUR>

¹¹ UNIDO SDG Indicators: <https://stat.unido.org/SDG>

4. CLASSIFICATION OF INDUSTRIAL PARKS IN EGYPT



4. Classifications of Industrial Parks in Egypt

The term industrial parks are not commonly used in Egypt, except for Industrial zones developed and operated by private sector companies, for which the Ministry of Industry and Trade (MoTI) has not yet issued a corresponding Arabic term. Instead, MoTI and its executive agency, the Industrial Development Authority (IDA), officially use the term “Industrial Zones” to indicate all areas allocated to industrial development. Depending on the applied fiscal and tax regime and the governing entities, several other terms are also used.

Table 1 below will summarize all formal terms referring to the Industrial Areas in Egypt.

Table 1. Summary of Formal Terms and Classification of Industrial Areas in Egypt

No.	Category	In Arabic	Managing Entities/Operator	Comments
1.	Standard Industrial Zones (no special fiscal or tax regime)	المناطق الصناعية	Industrial Development Authority (IDA), Private Sector, New Urban Communities Authority (NUCA), Governorates, and others	IDA could tender and select private sector operator for certain industrial zones
2.	Investment Zones	المناطق الاستثمارية	General Authority for Investments (GAFI) and Private Sector	GAFI could tender and select private sector operator for industrial zones
3.	Free (Trade) Zones	المناطق الحرة	GAFI	Typically gated but could include one company outside the zone if it meets the criteria and it is called “private sector” by GAFI. 9 public zones and 205 private free zones
4.	Special Economic Zones	المناطق الاقتصادية	General Authority for the Suez Canal Economic Zone	6 ports in 4 industrial zones
5.	Technology Parks	المناطق التكنولوجية	Collaboration between NUCA and Ministry of Communication & Information Technology (MoCIT), and Egypt Information Technology	6 technology parks allocated within NUCA's industrial zones (fall under Category 1)

			Industry Development Agency- ITIDA by establishing Silicon Waha Company as Park Operator	
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Other terms commonly used (but not official) to indicate industrial areas are:

- » **Industrial Cities:** usually used to indicate satellite cities that host significant industrial activity, e.g. Al Sadat, Al Obour and 10th of Ramadan industrial cities. These cities are classified under New Urban Cities by the New Urban Communities Authority. Al Sadat City, for example, has five industrial zones. It is surrounded by a green belt of 12,140 ha, which made the World Health Organization rank the city as the 10th best industrial community in the Middle East¹²
- » **Industrial Clusters:** usually used to refer to aggregations of specialized inter-dependent firms which belong to the same industrial sector or the same value chain, and which are located in a geographically distinct area, e.g. Damietta Furniture Cluster, Sha'a El Te'aban District Marble and Granite Cluster, El-Mahalla El-Kubra Textile Cluster and Robbiki Leather Cluster.
- » **Industrial Complexes:** Refers to pre-built, “plug and play” type industrial facilities, developed and sold through IDA.
- » **Industrial Parks (IPs):** Usually used to refer to smaller-scale gated industrial parks developed and operated by private sector companies and technology parks and are usually of a smaller scale than IZs, e.g. Polaris Al Zamil industrial park and Industrial West IPs.

According to MoTI and other sources, there are currently 147¹³ industrial parks in Egypt, which vary greatly in scale, characteristics and governance structure. This subsection will provide the classification of industrial parks by a) fiscal and tax regimes and b) governance and managing entities.

a) Fiscal and Tax regimes

The industrial parks in Egypt can be classified as a Free (Trade) Zone, Investment Zone, Technology Park, or be located within a Special Economic Zone which all follow special fiscal and regulatory regimes. Accordingly, industrial zones can be grouped into five main categories according to their fiscal and tax regime as summarized below.

1. **Standard Industrial Zones** المناطق الصناعية: General term to indicate large industrial areas (1 - 60 million m²), which do not follow a special tax or fiscal regime. Operated by different managing entities including governorates, NUCA and IDA.
2. **Free (Trade) Zones** المناطق الحرة: These are tax-free, customs-free zones and their production is intended mainly for exporting (at least 80% of it has to be exported). There are 9 public free zones regulated primarily by GAFI. Private free-trade zones

¹² areq.net مدينة السادات

¹³ This number is obtained from the interview with IDA in 2022.

also exist but these can be very small in scale, i.e., they can consist of only one factory or store and are not considered industrial zones in IDA's terms. Public Free industrial parks are supplied with facilities and essential infrastructural services such as electricity, water, sanitation, telecommunication, security and natural gas needed to receive, set up and run the investment projects as well as an independent customs unit. The General Authority for Investments (GAFI) rents the land to interested industries and facilitates the permitting process. The free trade zones follow Investment Law 72/2017. Public free industrial zones are operated by GAFI.

3. **Investment Zones** المناطق الاستثمارية: The investment zones regime governing the setting up of new investment zones according to the law (72) for 2017, that operates through a board of directors for each investment zone, who is assigned to provide the investment zones and all the projects with approvals and licenses necessary for operation. The Egyptian Cabinet has approved 15 investment zones all over Egypt, three of them are totally improved by GAFI, and more projects are likely to be approved to work under the investment zones regime.
 - » Issuing all necessary approvals and licenses for projects from GAFI, with easy procedures.
 - » The activity license issued by GAFI is sufficient in dealing with various state agencies in obtaining services, facilities, benefits, and exemptions for the project without the need for registration in the industrial registry.
 - » Acting on behalf of projects in dealing with all concerned authorities in the state through the Executive Office of the Investment Zone.
 - » The investment zone and board of directors manage its affairs and overcome all obstacles facing projects.
 - » It is not permissible for any administrative body to take any actions within the investment zones or the projects operating within them except after referring to GAFI.

4. **Special Economic Zones** المناطق الاقتصادية: Currently, the only Zone operating under this regime is the Suez Canal Economic Zone (SCZONE) which was established to promote investments in the Suez Canal area. The North-West Suez Special Economic Zone was the first special economic zone to be established in Egypt by Presidential Decree No. 35/2003 spanning over an area of 90 km² and was subsequently expanded by Presidential Decree No. 41/ 2007 to reach 96,666 km². Presidential Decree No. 330/2015 (the "SCZONE Decree") declared the areas adjacent to the Suez Canal as a Special Economic Zone (SEZ) following Law no. 83/2002 on Special Economic Zones ("Special Economic Zone Law" or "Law 83/2002") and Executive Regulations: Prime Ministerial Decree 1625/2002. In 2015, a decree was issued to expand the area to 461 km². Decree 147 for 2022 decreased the area to 454 km². The SCZONE is primarily regulated by the General Authority for Suez Canal Economic Zone and hosts four industrial parks. The SCZONE provides several fiscal and non-fiscal incentives, in addition to a simplified administrative process for the industries operating within its borders. Industrial parks within the SCZONE are operated by the General Authority of the SCZONE and private sector operators and are targeting exporting businesses and companies.

5. **Technology parks** المناطق التكنولوجية: Technology parks refer to the zones dedicated to industries in the field of communications and information technology. It includes manufacturing activities, design and development of electronics, data centres, outsourcing activities, software development, technological education, and other associated or complementing activities. They are usually located within the industrial area which exists in new cities and is operated by New Urban Communities Authority - NUCA). These zones are established by the Prime Minister Decree following a request by the Minister of Communications and Information Technology. All the tools, supplies, and machinery needed within the Technological Zones are not subject to taxes and customs duties. Each Zone has a Board of Directors formed by a decision issued by the Minister of Communications and Information Technology, in agreement with the Competent Minister. The technology parks follow Investment Law 72/2017. The Ministry of Communications and Information Technology (MCIT) launched Information Technology Industry Development Agency (ITIDA) as an executive IT arm in 2004 to spearhead the process of developing the Egyptian IT industry. Silicon Waha, a joint-stock company owned by MCIT, ITIDA, NUCA and the National Telecom Regulatory Authority (NTRA) operates the six Technology Parks.

b) Industrial parks governance and managing entities

All industrial parks in Egypt, except for SCZONE IZs, fall under the regulatory jurisdiction of IDA, specifically concerning industrial permits, operation permits and environmental permits. Up until 2017, the Egyptian Environmental Affairs Agency (EEAA) was responsible for issuing environmental approvals and conducting regular environmental inspections and compliance audits during operation. Law 15/2017, known as the Industrial Permits Act, gave greater regulatory controls to the IDA and moved all environmental permitting and environmental compliance authorities to IDA, including industries located in Free Zones and Investment Zones; Meanwhile, companies operating in the field of oil exploration, extraction, refining, storage and transport get their environmental approvals from EEAA which is sent to the competent authority (affiliated to the Ministry of Petroleum) to provide the license. On the other hand, firms at SCZONE get all their approvals from the SCZONE authority. SCZONE acts as a one-stop shop in addition to the golden license that SCZONE can provide. The Industrial Permits Act also aimed to streamline the industrial licensing process, encouraging the establishment of new industries and the licensing of existing industries, which were previously part of the informal sector.

In addition to the IDA, other regulatory bodies can play a significant regulatory role depending on the situation of each IZ, these include GAFI for IZs classified as Investment or Free-Trade Zones, The General Authority of Suez Canal Economic Zone, New Urban Communities Authority - NUCA (Ministry of Housing and Urban Development) and Ministry of Local Development and other ministries.

The management arrangements and the quality of provision of common infrastructure and tenant services vary greatly between the different industrial zone developments. The latest list of industrial parks currently operating in Egypt and their categorisation is made available in Annex II (issued by IDA). The following categories can be discerned according to the managing entity of each industrial park:

1. Industrial parks managed by governorates (total of 74 parks)

Make up the majority of the industrial parks in Egypt. They are regulated, developed and operated by governorate and municipal authorities in conjunction with the IDA. GAFI plays a role in the registration of industrial park investments and governs procedures in the free zone area of a park. Industrial parks managed by governorates can be further categorized into:

- i. Industrial parks managed by Lower Egypt governorates, often have inadequate or missing basic infrastructure including power, roads, water supply, and sewerage/wastewater networks. No single entity is responsible for the provision and maintenance of utilities, which are the responsibility of the separate relevant ministries/companies e.g. electricity company and the water company. Lands are sold by governorates to investors. Most lack a dedicated management entity, common utilities and services, and gates.
- ii. Industrial parks managed by Upper Egypt governorates, which are supervised by a General Manager and staff employed by the Ministry of Local Development and a governorate-level parks board composed of representatives of all relevant entities (IDA, GAFI, parks general managers, governorate legal department, governorate investment department and governorate scientific adviser) who ensure that investors adhere to their rights and obligations as zone tenants. Industrial land is allocated to eligible investors free of charge through the IDA, a role previously played by the industrial park's board. Upper Egypt parks are not operated on a cost recovery or profit basis and frequently suffer from inadequate or missing utilities and infrastructure. IDA finances capital investments in parks located in Upper Egypt and throughout the country through its Industrial Zone Investment.

2. Industrial parks managed by the New Urban Communities Authority – NUCA (total of 33 parks) and Regulated by NUCA and IDA.

GAFI plays a role in the registration of investments for the parks and governs procedures in the free zone area of an industrial zone. They are developed as part of the integrated planning of new urban communities and accordingly enjoy good access to labour and infrastructure grids. The quality and types of utilities provided to the parks are fairly homogenous as they are part of the infrastructure grid of the new communities, but they lack the fit-for-purpose and dedicated infrastructures required for an industrial zone. This type of park is overseen by the local NUCA authority as there is no dedicated management team or public budget reserved for its development.

According to the new classification of industrial zones, industrial parks managed by private developers/operators are accounted for under NUCA. The development of private industrial parks is encouraged by the Ministry of Industry and Trade. All private IPs are developed in response to tenders by IDA and are primarily regulated by IDA. Some private IPs are also classified as “private free zones” or “economic zones” and are accordingly regulated by GAFI in addition to IDA. According to a recent benchmarking study conducted by the GIZ, privately developed industrial parks were closer to best management practices than the ones managed by governorates or NUCA. Private IPs have dedicated professional management to the zone that offers common utilities and services to resident firms, and operate on a cost-recovery and for-profit basis. Off-site infrastructure for private IPs existing in new cities is usually developed and/or supervised by NUCA.

3. **Industrial parks managed by GAFI (total of 14 parks):** These type of park is classified as Free-Trade or Investment zones (as explained above). It should be noted that, when

referring to this kind of industrial area, GAFI does not use the term either industrial parks or industrial zones. Instead, it refers to them as an Investment zone or Free-Trade zone.

4. Industrial parks managed by MoTI and IDA (total of 20 IZs)

The industrial area allocated to MoTI and IDA is usually located away from large cities and road networks. They typically lack infrastructure utilities and have a very low occupancy rate. No operation management structure currently exists for the parks managed MoTI/IDA.

5. Industrial parks managed by the Suez Canal Economic Zone (SCZONE) (total of 4 parks)

The SCZONE board of directors has the same authority as the Egyptian cabinet of ministers within the SCZONE. The parks are regulated primarily by the General Authority of the Suez Canal Economic Zone, and they issue all needed permits except for any permits/clearances required by the Ministries of Interior, Defense, Foreign Affairs, or Justice. The SCZONE hosts four parks: a) Sokhna IZ: Heavy, medium and light Industries (highest occupation rate) and GH2 projects, b) East Port Said IZ: medium scale & light industries, c) West Qantara IZ: Agro-based industries and d) East Ismailia IZ: Silica and glass industries and industrial activities in the naval ports. Industries operating within the SCZONE enjoy various incentives which include 0% custom tax, 0% VAT, 50% corporate tax refund (valid for 7 years), 100% foreign ownership allowed, 5-year residency permit to foreign investors, labour-intensive projects using local components, export and import regulations, new customs guide and manual, export support program, and one-stop shop.

6. Industrial parks managed by other entities

Industrial Zones are managed by the Holding Company for Construction and Development (2 IZs).



5. EIP POLICY AND REGULATORY FRAMEWORK IN EGYPT

5. EIP Policy and Regulatory Framework in Egypt

A policy and regulatory mapping can help identify barriers that hinder the implementation of the national EIP framework in Egypt and determine the need for modification of the regulatory framework and/or legal provisions. This section examines Egyptian policies and regulations on industrial development, investment, energy, and environmental and social protection, which are relevant in the context of planning, construction, and operation of industries and industrial zones. In addition to that, this section outlines the main development projects and financial services provided to industrial firms in Egypt to promote the EIP concept.

5.1 National Strategies

Egypt's First Updated Nationally Determined Contribution Report¹⁴ mentions that the Government of Egypt intends to promote the EIPs concept to scale up resource efficiency through the improvement of economic, environmental, and social performances of businesses and the creation of green industries (such as recycling and renewable energy) towards inclusive and sustainable industrial development. This document suggests that there is a political will in Egypt to mainstream the concept of EIPs.

This sub-section explains the main four national strategies in Egypt related to EIPs: Egypt Vision 2030, National Climate National Strategy 2050, Industry and Trade Development Strategy and Integrated Sustainable Energy Strategy 2035.

Egypt Vision 2030

The “Vision 2030” is the government’s medium-term vision to achieve sustainable development. It was prepared through a long process of consultations and workshops with participation by academics, the private sector, government officials and international organizations. The Vision 2030 was developed to (i) prepare the ground for short and medium development plans at national, local and sectorial levels, (ii) enable Egypt to be an active global player, (iii) meet the ambitions of Egyptians to improve the efficiency of basic services, (iv) set a monitoring system through objectives, key performance indicators (KPI) and targets and (v) align the Vision 2030 targets with the SDGs targets. Vision 2030 is organized based on ten pillars encompassing the economic, social and environmental dimensions¹⁵. The main pillars that are related to the EIP concept are:

- » First pillar (Economic Development): “By 2030, the Egyptian economy is a balanced, knowledge-based, competitive, diversified, market economy, characterized by a stable macroeconomic environment, capable of achieving sustainable inclusive growth. An active global player responding to international developments, maximizing value-added, generating decent and productive jobs, and a real GDP per capita reaching high-middle income countries level”.
- » Second pillar (Energy): “An energy sector meeting national sustainable development requirements and maximizing the efficient use of various

¹⁴ In the framework of the United Nations Framework Convention on Climate Change (UNFCCC), Egypt submitted its updated Intended Nationally Determined Contribution (INDC) in 2022 to achieve the global targets set out in the UNFCCC’s Paris Agreement. <https://unfccc.int/sites/default/files/NDC/2022-07/Egypt%20Updated%20NDC.pdf.pdf>

¹⁵ UNIDO (2020), The Programme for Country Partnership- Egypt

traditional and renewable resources contributing to economic growth, competitiveness, achieving social justice, and preserving the environment. A renewable energy and efficient resource management leader, and an innovative sector capable of forecasting and adapting to local, regional and international developments and complying with SDGs".

- » Fifth pillar (Social justice): "By 2030, Egypt is a fair interdependent society characterized by equal economic, social, and political rights and opportunities realizing social inclusion. A society that supports citizens, right to participation based on efficiency and according to law, encouraging social mobility based on skills. A society that provides protection, and support to marginalized and vulnerable groups".
- » Ninth pillar (Environment): "Environment is integrated into all economic sectors to preserve natural resources and support their efficient use and investment while ensuring next generations' rights. A clean, safe and healthy environment leading to diversified production resources and economic activities, supporting competitiveness, providing new jobs, eliminating poverty and achieving social justice".

National Climate Change Strategy 2050

The National Climate Change Strategy has been developed as a strategic roadmap for overcoming climate change challenges and achieving the environmental objectives of Egypt Vision 2030. The strategy will enable Egypt to plan and manage climate change at different levels in a way that supports the achievement of the country's desired economic and development goals, following a low-emissions approach. The strategy involves five goals¹⁶:

- » Achieving sustainable economic growth and low-emission development in various sectors.
- » Enhancing adaptive capacity and resilience to climate change and alleviating the associated negative impacts.
- » Enhancing climate change action governance.
- » Enhancing climate financing infrastructure.
- » Enhancing scientific research, technology transfer, knowledge management and awareness to combat climate change.

The strategy encourages the implementation of several measures in line with the EIP concept. They include:

- » Increasing the use of renewable energy to generate electricity within industrial facilities and the applications of solar thermal energy in industrial processes.
- » Enhancing the energy efficiency of industrial processes in all industries.
- » Increasing the coverage of sewage treatment plants and industrial wastewater in different areas to recycle water, maintain its quality and maximize its use.

¹⁶ Ministry of Environment (2022), Egypt National Climate Change Strategy 2050

- » Promoting the concept of sustainable consumption and production trends for the reduction of greenhouse gas emissions from other non-energy activities.

Industry and Trade Development Strategy (2016-2020)

The Industry and Trade Development Strategy (2016-2020) was extended to June 2022. The strategy aims at providing an adequate environment for a sustainable inclusive economy based on enhanced competitiveness, diversity, knowledge, innovation and generating decent and productive job opportunities. The strategy's main goals are¹⁷:

- » Increase the annual industrial growth rate to 8%.
- » Increase the contribution rate of industrial products to GDP from 18% to 21%.
- » Increase the MSMEs' contribution to GDP.
- » Increase the growth rate of exports to 10% annually.
- » Provide 3 million decent and productive job opportunities.

The strategy places a high priority on the further development of industrial zones as it includes a strategic project entitled **“Environmentally Friendly Industrial Clusters Project”**. This project works on the establishment of industrial clusters all over the country, as a developmental solution to enhance industrial integration between large corporate factories from one side and MSMEs from another side. It contributes to encouraging local and foreign investments towards complimentary, value-added and technological industries, in addition to the supported projects to develop a greener economy. This project also encourages investment in food industries to achieve complete integration between agricultural and industrial sectors. Moreover, the project aims to increase the value-added in the utilization of irrigation water and crops by leveraging linkages between farmers and industrial firms and increasing the economic value of agricultural products. Priority clusters of this project are Robbiki Leather Cluster, the Furniture Cluster in Damietta, Plastic Industry Cluster in Morghem in Alexandria, and the Industrial clusters in Qena and Sohag.

Integrated Sustainable Energy Strategy (ISES) 2035

The Government of Egypt started developing a new 20-year strategy, the Integrated Sustainable Energy Strategy (ISES) 2015 to 2035, through a project funded by the European Union and implemented in cooperation with all relevant national partners. The strategy seeks to ensure the security and sustainability of the energy supply, which involves stepping up the development of renewable energy sources and overall energy efficiency, in part through vigorous rehabilitation and maintenance programmes in the power sector¹⁸. The main targets of the strategy are:

- » Supply 20% of generated electricity from renewable sources by 2022.
- » Supply 42% of generated electricity from renewable sources by 2035.
- » Reduce energy use by over 8% by 2022 with the base year of 2006/07.

¹⁷ Ministry of Trade and Industry (2016), Industry and Trade Development Strategy.

¹⁸ IRENA (2018), Renewable Energy Outlook: Egypt, International Renewable Energy Agency, Abu Dhabi.

- » Reduce natural gas contribution to power generation capacity from 90% in 2014/15 to 49% in 2035.

To date, the country's total installed capacity of renewable energy amounts to 3.7 gigawatts (GW), including 2.8 GW of hydropower and around 0.9 GW of solar and wind power¹⁹. As specified in the ISES for 2035, the Egyptian government has set a renewable energy target of 42% by 2035. The country has great potential to reach this ambitious target, as Egypt enjoys an abundance of renewable energy resources with high deployment potential, including hydropower, wind, solar and biomass.

In addition to the aforementioned strategies, several national strategies affect EIP development including the emerging Long Term Low Emission Development Strategy 2050 (LT-LEDS), the National Strategy for Adaptation to Climate Change and Disaster Risk Reduction, National Energy Efficiency Action Plan, Integrated Solid Waste Management Strategy, and Sustainable Agricultural Development Strategy towards 2030.

5.2 Laws and Regulations

Industrial Development Laws

A regulatory reform aiming at encouraging industrial growth has started in Egypt intending to reach the targets of the industrial development strategy as set by MoTI²⁰. The following are the recent laws issued/amended as part of this reform:

Law 95/2018, referred to as the Industrial Development Authority (IDA) law, was issued on 11 June 2018, to restructure and regulate the IDA law. The Law provides that the IDA is an economic public body with an independent legal personality affiliated with the Ministry of Trade and Industry and establishes the IDA as the body responsible for the implementation of industrial policies. Article no. 3 of this law mentions that the IDA is responsible for formulating policies and plans for developing industrial zones, as well as taking decisions and putting standards for the establishment of new industrial zones or the expansion of existing ones. The Law defines an Industrial Zone as "*Lands that are dedicated to industrial purposes and its related services*".

In addition, the Law regulates the work of the Industrial Development and Support Fund. The mandate of this Fund is to support the establishment, construction and development of industrial zones in Egypt, subsidize the prices of industrial lands, enhance the competitiveness of industrial zones and attract investments. The resources of this new Fund come from the public budget, a portion of IDA resources and grants.

Regarding industrial land allocation, an **amendment to Law No. 7/1991** was issued in **2016** to solve the conflict among the various entities on state-owned lands. The amendment grants the IDA absolute authority over industrial land. The IDA is now the exclusive authority to decide on industrial land allocation, including planning, developing, installing utilities and infrastructure and maintenance, or putting the land up for bids. Allocation of industrial land could be in the form of sale, rent, hire-purchase or usufruct.

In a major step to encourage investment in the industrial sectors and the integration of the informal industries into the formal sector, the GoE issued **Law 15 of the year 2017**, to streamline the issuance of licenses required for industrial establishments including the establishment of industrial estates. **Law 15/2017** and its executive regulations issued by **Decree 1082 for 2017** state that the Industrial Development Authority (IDA) is the Competent

¹⁹ Ibid.

²⁰ According to IDA, a new law regulating in specific the development and operation of industrial zones is currently being prepared.

Administrative Authority (CAA) solely responsible for permitting the establishment, management, operation, expansion, change of activity or relocation of industrial establishments.

The new processes establish the licensing of industrial facilities either through (1) simple notification, which applies to industries of limited hazards or (2) prior approval for industries that pose significant health, security, safety or environmental hazards. A listing of the industries that require permits, Category C projects, is included in the Law's Executive Regulations.

Moreover, Article 12 of **Law 15/2017** states that newly established industrial zones/estates should be managed by a Board of Directors to be formed according to a Prime Ministerial decree as proposed by IDA. The Board is responsible for one or more industrial zones and can provide permits to private-sector industries applying to operate within these zones.

The issuance of **Law 15/2017** was widely welcomed by the industrial sector in Egypt, yet the implementation of some of its provisions faces challenges. The challenges are related to the lack of tools, and human and financial resources needed by the IDA to perform all its new roles as established by the law, as well as the lack of clarity on the roles of other ministries and government entities, which were previously involved in industrial permitting. To put the magnitude of the new changes to the industrial licensing administrative process into context, the average period needed for industries to receive licenses before the law was more than 600 days²¹, compared to the 7 and 30 days mandated by the new law.

Presidential Decree No. 488 for the year 2000 (not part of the regulatory reform mentioned earlier) established the organizational structure of the Industry Modernization Centre (IMC). Under this decree, the Industrial Modernization Council is responsible for policy formulation and approval of the work of the Centre, for providing specialized studies, and proposes the necessary to achieve various goals of industrial modernization and development policies. Board members include representatives from the private industrial sector, and private financing, while also including a representative from universities and research centres.

Investment Law

Law 72 of 2017 promulgates the Investment Law applies to inland investment zones, investment zones, free zones or technology parks. This law includes articles on investment goals and principles, guarantees and incentives, social responsibilities of investors, investment plans and policies and investment regimes for each zone type. It also specifies entities in charge of investment affairs. The new Investment Law also dedicates Chapter 3 to the specification of the social responsibilities of investors. These include the protection of the environment, providing healthcare and social services and programmes, support for technical education and awareness campaigns, and supporting training and scientific research. The Investment Law includes the following incentives:

- **General Incentives:** According to Articles 9 and 10 of the Law, all investments that are subject to the provisions of this law, except companies established under the Free Zone Regime, enjoy the following general incentives:

²¹ MoTI official website: <http://www.mti.gov.eg/English/MediaCenter/News/Pages/Minister-of-Trade,-Industry-issues-industrial-license-law-executive-regulations-.aspx> , retrieved on 20/10/2019

- » Memoranda of Incorporation of enterprises, credit facilities, and pledge contracts associated with business establishments are exempted from the stamp tax and fees for the notarization and publicization. This is for a period of 5 years from the date of registration in the Commercial Register.
 - » Contracts of registration of the lands required to establish the companies are exempted from the abovementioned tax and fees.
 - » The companies and establishments have a preferential tariff treatment by unifying the customs duty bracket in the amount of 2% of the value of all imported machinery, equipment, and devices.
 - » Industrial firms have the right to import the casts, moulds and other similar raw materials, with no customs duties, for temporary use in manufacturing products, and, thereafter re-exported abroad.
- **Special Incentives:** Article 11 indicates that companies that are established after Law 72 of 2017 enters into force receive a discount off the taxable net profits, as follows:
- » Sector A: It is granted a 50% discount on the investment costs. Sector A includes the following geographical areas: Suez Canal Economic Zone, Golden Triangle, and the neediest areas.
 - » Sector B: It enjoys the privilege of a 30% discount on investment costs. Sector B involves the rest of the regions in Egypt, by the distribution of the investment activities, for the following investment fields:
 - The engineering, metallurgical, textile, and leather industries.
 - The labour-intensive sectors, small and medium enterprises, and exporting activities
 - **The projects which depend on or produce the new and renewable energy**
 - The national and strategic projects defined by the Supreme Council of Investment
 - The tourism projects defined under a decision issued by the Supreme Council of Investment
 - The electricity generation and distribution projects
 - The automotive manufacturing and auto-feeding industries; Wood, furniture, printing, packaging, and chemical industries; The antibiotics, oncology drugs, and cosmetics industries
 - The food, agricultural products, and **agricultural waste recycling industries**
- **Additional Incentives:** According to Article 13 of the investment law, the Cabinet of Egypt could grant additional incentives to investors as follows:
- The State may incur the costs paid by the investor, in whole or in part, for the extension of utilities to the real-estate properties allocated for the investment project, upon the operation of the Project.

- An Industrial investor has the right to refund 50% of the value of the land allocated for his project, provided that production starts within two years from the date of receiving the land.
 - The Golden License is granted by the cabinet in 24 hours for strategic industrial projects.
- **Technological Zones Investment Incentives:** According to Article 32 of the Investment Law, the Prime Minister has the right to license the establishment of Technological Zones in the field of Communication and Information Technology Industry (e.g. industrial activities, electronics, software development and data centres). All equipment, machinery, suppliers, and tools required for investments established in the Technological Zones are exempted from taxes and customs duties. Investors, also, enjoy the same special incentives mentioned in point (B).

MSMEs Law 152/2020:

The new MSMEs Law 152/2020 grants tax and tariff incentives for MSMEs in addition to business development services. It also creates new measures to transform informal businesses into a formal economy. This law establishes the Micro, Small and Medium Enterprises Development Agency (MSMEDA) to be responsible for financing and facilitation of any required procedures for MSMEs, entrepreneurship, and informal economy projects. One of the key advantages of this law is providing a unified definition for MSMEs in Egypt. MSMEs could receive the following incentives after getting approval from the Board of Directors of the MSMEs Development Agency:

- » The State incurs the costs paid by the MSMEs, in whole or in part, for the extension of utilities to the real-estate properties allocated for the investment project, upon the operation of the Project.
- » The state incurs costs of employee training and capacity building.
- » Allocating lands for SMEs with zero cost or with cheap prices.
- » Refunding 50% of the value of the land allocated to the SMEs.
- » Exemptions from registration fees of patents and designs.
- » Memoranda of Incorporation of enterprises, credit facilities, and pledge contracts associated with businesses establishment are exempted from the stamp tax and fees for the notarization and publicization. This is for a period of 5 years from the date of registration in the Commercial Register.
- » Contracts of registration of the lands required to establish the companies are exempted from the abovementioned tax and fees.
- » The MSMEs have a preferential tariff treatment by unifying the customs duty bracket in the amount of 2% of the value of all imported machinery, equipment, and devices (except vehicles and cars).
- » Capital gains are exempted from taxes provided that these gains are reinjected in the business by buying new assets, equipment, or machines during the first year of getting these gains.
- » Distributed profits shall not be subject to the provisions of the laws on taxes.

- » After approval from the board of directors of the MSMEDA, service providers that contribute to creating an enabling business environment for micro and small enterprises (MSEs) are granted the same incentives provided by the MSMEs law. This includes the following services
 - Establishment of parks for industrial, commercial, services, or handicraft activities (including dedicated spaces for MSEs).
 - Training and capacity-building activities especially in the field of technology.
 - Outsourcing raw materials from the MSEs.
 - Connecting MSEs to export markets and participating in international trade fairs.
 - Connecting MSEs to research institutions.
 - Providing technical, legal, managerial, or accounting services.

Special Economic Zones

The Suez Canal Economic Zone (SCZONE) was created under the Special Economic Zones **Law No. 83 of 2002**, as amended in 2015 by **Law No. 27 for 2015 (Decree 330/2015)**, and in 2022 by **Decree 147/2022**. SCZONE is governed by the General Authority for the Suez Canal Economic Zone which is an autonomous body with executive powers of regulation and approval including the full authority to oversee all areas of operation, staffing, control over budgets, funding, development of partnerships with developers and business facilitation services. SCZONE manages industrial zones in Ain Sokhna (A and B), East Port Said, and West Qantara as well as a technology valley on the East Bank of the Suez Canal. It also manages 6 maritime Ports; East Port Said, West Port Said, Ain Sokhna, El Arish, El Tor, and Adabiya Port. Sczone provides incentives such as 0% custom tax, 0% VAT, 50% corporate tax refund (valid for 7 years), 100% foreign ownership allowed, a 5-year residency permit to foreign investors, labour-intensive projects using local components, export and import regulations, new customs guide & manual, export support program and one-stop shop.

Environmental Protection Laws

Several Egyptian legislations regulate the subject of environmental protection for industries. The most important of these is the Environment Law; **Law 4 of the year 1994** as amended by **Law 9 for the year 2009** and its Executive Regulations (ERs) issued by Prime Minister No. 338 for the year 1995. The ERs were amended by Decrees 1741/2005, 1095/2011, 710/2012 and Decree 964/2015.

The legislation is issued by the Egyptian Environmental Affairs Agency under the Ministry of Environment. The main aspects of the Law 4/1994 that are directly related to EIPs are those related to:

- » Permitting of establishments and preparation of Environmental Impact Assessments (EIAs)
- » Air quality and emissions
- » Ambient Noise
- » Solid waste
- » Hazardous substances and waste
- » Workplace environment

Other relevant laws addressing environmental protection include:

- » **Law 48/1982** concerning the Protection of Nile River and Water Streams.
- » **Law 93/1962** and the amendment of its Executive Regulations issued by the **Ministerial Decree No. 44/2000** relate to the discharge of wastewater into the sewage system and public network.
- » **Law 38 of 1967** on General Public Cleaning and **Law No. 106 of 2012** amending several articles of Law 38, and its executive regulations (**Decree 134/1968**), is the primary law governing the management of solid waste in Egypt.

The Egyptian Environmental Affairs Agency has also prepared the “EIA Guidelines for Industrial States Development” which specifies that for industrial development projects, EIA may be needed for the:

- » Development of land as industrial estates on which services and infrastructure are provided in advance of the occupying industries being known,
- » Specific industrial projects on existing serviced industrial land,
- » Specific industrial projects on standalone sites.

The new “**Waste Law**” 202 of 2020 has been issued to ensure the application of integrated waste management principles in Egypt. The Waste Law defines “industrial waste” and specifies the IDA as the Competent Administrative Authority (CAA) responsible for regulating, planning and monitoring industrial waste management operations. Articles regulating “industrial waste” state that the IDA as well as industrial, free or investment zones have to prepare an integrated industrial waste management plan that should be periodically reviewed and updated. The Waste Management Regulatory Authority (WMRA) is responsible for endorsing such plans for industrial waste. The new law also promotes “green labels” as an incentive to use recyclable materials and inputs to the industrial process and reduce waste generation. Moreover, the law introduces the principle of Extended Producer Responsibility (EPR) which is a new policy that makes producers responsible for the entire life cycle of the products that they produce, from their design until the end of life.

Moreover, the new Waste Law establishes **WMRA** to carry out the formulation of policies, strategies and master plans for solid waste management. WMRA is responsible for monitoring and ensuring the implementation of all the processes related to waste management on the national level to ensure safe waste management and disposal processes. The law defines the necessary steps to be taken for WMRA to achieve its goals:

- » Develop adequate legislation and strategic plans to improve all aspects of integrated waste management in the country.
- » Develop mechanisms and procedures for cost recovery.
- » Provide guidance and supervision to decentralized developments related to solid waste management and cleanliness in all Governorates.
- » Collect and analyse data on the quantities and composition of solid waste at the Governorate level, and establish systems for data management, monitoring and reporting.
- » Develop execution models and financing schemes to deal with all types of waste, including packaging and packaging waste, electronic waste, batteries, construction and demolition waste, industrial waste, agricultural waste and medical waste.

- » Develop cooperation between the ministries, governorates and competent authorities in planning for strategic management of different kinds of waste on the national level.
- » Prepare development proposals and update the rules of integrated waste management.
- » Prepare performance indicators for the process of waste management.
- » Set up a committee to review the complaints and propose solutions for any related issue.
- » Train, and provide public awareness and support for people involved in waste management.
- » Prepare technical studies and procedures for the determination of fees of integrated waste management.
- » Encourage scientific research and increase reliance on technology in waste management and treatment.

Renewable Energy and Energy Efficiency Laws

Working towards achieving the goals of its sustainable development strategy for 2030, the GoE is working towards diversifying its energy mix. To encourage the private sector to produce electricity from renewable energy sources, the GoE has issued the new **Renewable Energy Law No. 203 of 2014**. Article two of the Renewable Energy Law adopted several development schemes for the private development of renewable energy projects, including competitive bids, feed-in tariffs, and independent power production through third-party access.

In the meantime, as a response to a severe energy crisis, the Egyptian Cabinet Issued on April 2, 2014, a decree allowing the use of coal in the Egyptian Cement Industry and Power generation. The Executive Regulations of Law 4/1994 on the Environment was amended by the Prime Minister's Decree No. 964 in 2015. The amended Regulations include the standards and conditions for using, storing and handling coal. Under the section titled "General conditions and regulations for use and handling of coal, pet coke and alternative fuels", the license to use or handle the fuel mix is issued by the relevant ministry after approval of EEAA on the EIA study presented by the company. The license is renewed every two years after approval of EEAA on a performance report presented by the company. Cement firms are to invest in GHGs emissions-cutting initiatives to renew their operational licenses although no specific technologies are prescribed for adoption. The use of alternative fuels (i.e. municipal solid waste, industrial waste) has been encouraged by the government of Egypt as one of the possible GHGs mitigation options.

The new **Electricity Law 87/2015** also includes several stipulations encouraging the incorporation of energy efficiency measures in different sectors. Article 48 requires that an official is assigned for subscribers whose contractual capacity exceeds 500 KW to be assigned to improve the power usage efficiency and keep a power register, as described in the Executive Regulations of this law. Article 50 stipulates that the entity assigned by the Cabinet to improve electricity usage efficiency shall, in cooperation with the other competent authorities, develop policies aiming to:

- » Expand the scope of developing power efficiency specifications and cards for the electricity-consumptive devices and equipment.

- » Replace the low-efficiency devices and equipment with others, as outlined in the Executive Regulations.
- » Improve the electric power usage efficiency in the industrial and commercial systems

Article 51 stipulates that producers and importers of electricity consumptive devices and equipment shall place power efficiency cards on the electric devices, following the Ministerial Decrees issued in this respect and the provisions of the Executive Regulations.

Decree No. 2/2020, of the Egyptian Electric Utility and Consumer Protection Regulatory Agency, includes some measures regulating electricity generation and exchange. It mentions that industrial firms can install solar energy stations and generate electricity for their consumption. However, an industrial firm is not allowed to generate electricity exceeding its annual consumption.

Green Hydrogen Strategy

The government of Egypt is preparing for a National Green Hydrogen Strategy which is soon to be announced.

Laws regulating employment and working conditions

The **Unified Labour Law 12/2003** establishes comprehensive guidelines on labour relations, including hiring, working hours, termination of employees, training, health, and safety. The law includes articles on duties and responsibilities between workers and employers; due consideration to the social dimensions of the economy; a reflection of international labour standards principles; safeguarding workers' rights; and annual wage increase. Provisions for limits for and monitoring of workers' exposure to noise, heat stress, light intensity and ambient air quality are included in Law4/1994, as amended.

The Labour Law also contains several articles safeguarding women's labour rights. These include prohibiting wage discrimination based on gender (Article 35) and emphasizing the equal application of the Law for men and women (Article 88). Articles No. 91, 92, 93, 94 and 95 of the Labour Law relating to women's rights to maternity leave.

A summary of the relevant laws can be found in Table 5.

Table 2. Summary of relevant Egyptian legislation

Topic	Egyptian Legislation	Description
Establishment and restructuring of IDA	Presidential Decree 350/2005 Law 95/2018	Indicate the structure, powers and responsibilities of IDA regarding industrial development
Establishment of IMC	Presidential Decree 488/2000	Establishing the IMC
Establishment of SCZONE	Presidential Decree 330/2015 Amended by Decree 147/2022 area of 454 km ²	Establishes the SECZ on an area of 461 km ² and indicates the roles of the SCZONE authority and its board of directors. Amended by Decree 147/2022 area of 454 km ²

Permitting of industrial development	Article 19 and 20 of Law 4/1994 as amended by Law 9/2009	The project developer is to submit an EIA to be approved by EEAA and the CAA should provide maps of industrial areas clarifying types of the industries allowed depending on environmental loads.
	Law 15 for 2017 and its executive regulations Decree number 1082 for 2017	Provides a listing of the Category C projects that requires preparation of a full EIA
Investment Law	Article 9 of Law 15/2017	Establishment and operation of industrial estates requires the approval of CAA in designated geographical areas as per the approval of the Cabinet of Ministers
MSMEs	MSMEs law 152/2020	It grants tax and tariff incentives for MSMEs in addition to business development services. It also establishes the MSMEDA to be responsible for financing and facilitation of any required procedures for MSMEs.
Special Zones Law	Law 83/2002	Regulates the establishment of special economic zones
Ambient Air Quality	Article 35 of Law 4/1994 and article 34 of its ERs (amended by Decree 710/2012) and Annex 5 of the ERs	Provide the maximum allowable limits for ambient air pollutants.
Gaseous Emissions	Article 36 of Law 4/1994 and article 37 of its ERs (amended by Decrees 710/2012) as well as Tables 23 and 24 of Annex 6 of the ERs	Provide the maximum allowable limits for exhaust gases from gasoline and diesel engines.
	Article 40 of Law 4/1994 and article 42 of its ERs (amended by Decrees 710/2012 and 964/2015)	Provide the maximum allowable limits for the concentrations of pollutants resulting from fuel burning as well as maximum allowable limits from stacks for some industries such as cement (Tables 1&2&6, Annex 6).
Ambient Noise	Article 42 of Law 4/1994 and article 44 of the ERs (Amended by Decree 710/2012)	Provide the maximum allowable limits for ambient noise intensity (table 3, Annex 7).
Water Resources Protection	Article 61 of Law 48/1982 concerning Protection of Nile River and Water Streams	Provides maximum limits parameters of treated wastewater that can be discharged into water streams and groundwater reservoirs.
Wastewater Discharge	Law 93/1962 and the amendment of its Executive Regulations issued by the Ministerial Decree No. 44/2000, Article 14	Provide limits and specifications for discharging wastewater into public sewer networks

Solid Waste	<p>Law 202/2020 for waste management replaced all articles related to solid wastes in Law 4 of 1994.</p> <p>Law 38 of 1967 on General Public Cleaning and Law No. 106 of 2012 amending a number of articles of Law 38, and its executive regulations (decree 134/1968)</p> <p>In 1968, the Minister of Housing issued the executive regulations (MoH 134 of 1968) for the law.</p>	<p>Primary law governing the management of solid waste in Egypt.</p>
	<p>Articles 37 of the Environmental Law 9 of 2009 and Annex 11 of its modified Executive Regulations (1095 of 2015)</p>	<p>Concerned with the collection and transportation of solid wastes.</p>
	<p>Article 39 of Law 4 of 1994 and Article 41 of the modified Executive Regulations (1741/ 2005)</p>	<p>Set the precautions to be taken during construction and demolition and transport of the resulting waste and dust.</p>
	<p>Article 37 of Law 9 of 1994 and Article 38 of its modified Executive Regulations 1741/2005 and 964/2015</p>	<p>Prohibits burning of waste and sets criteria for location of waste treatment and disposal areas</p>
	<p>Articles 40, 41 of the Decree 211/2003 of Ministry of Manpower and Immigration (MOMI)</p>	<p>Indicates that the workplace should be tidy, completely clean and free from wastes.</p>
	<p>The new Waste Law 202/2020</p>	<p>Defines “industrial waste” and species the IDA as the Competent Administrative Authority responsible for regulating, planning and monitoring industrial waste management operations. Requires the preparation of an integrated industrial waste management plan for all industrial zones that should be periodically reviewed and updated. It also promotes “green labels” as an incentive for waste reduction and reuse in industries and introduces extended producer responsibility.</p>
Hazardous Substances and Wastes	<p>Article 29 of Law No. 4 of 1994</p>	<p>Prohibits handling hazardous substances without obtaining a license from the competent authority.</p>
	<p>Article 28 of the Executive Regulations of Law No. 4 of</p>	<p>Sets requirements for hazardous waste identification, minimization, segregation, storage, transportation and on-site treatment. It also requires implementation of the Best</p>

	1994 (amended in decree 1095/2011)	Available Technologies for minimizing the generation of hazardous waste.
	Article 31 of the ER of law 4/1994,	Requires appropriate storage of hazardous chemicals and emergency plans.
	Article 33 of Law No. 4 of 1994 (amended by law 9/2009)	Specifies precautions to be taken when handling hazardous material to ensure worker safety and avoid impact on the environment.
	Decree 211 of 2003, article 26 and 31	Sets conditions for the storage of flammable material including fuel and requires worker training.
Storage of Raw Material and Products	Decree 211/2003, article 31	Provides requirements for storage of raw material, products and equipment.
Workplace air quality	Annex 8 of the Executive Regulations of Law 4, 1994 (amended by Decree 1095 of 2011)	Set the maximum allowable limits of air pollutants inside the workplace
Workplace noise	Annex 7 Executive Regulations of Law 4, 1994	Provides maximum permissible noise levels inside the workplace
Workers health and safety	Law 12/2003, Labour Law, section 5	Addresses vocational safety and health and ensuring labour environment security
	Articles 43-45 of Law 4/1994	Addresses the need for controlling and monitoring work place environment in terms of indoor air quality, noise, heat stress and humidity as well as the need for provision of the necessary protective measures to workers
Electricity Law	Law 87/2015 articles 48, 50 and 51	Indicating the provisions related to energy efficiency equipment and energy management
Renewable Energy Law	Law 203/2014	Sets out the different legal mechanisms for production of energy from renewable fuels
Coal use for cement industries and fuel generation	PM Decree 964/2015	Allows for the use of coal as fuel in cement industry under specific conditions
Labour Code	12/2003	Main legislation regulating labour and employment.

5.3 Technical Assistance and Financial Producers Related to EIPs

1. Technical Assistance

Different entities/programmes are providing ongoing support and services related to the development of EIPs. These entities include the Egypt National Cleaner Production Centre under the Ministry of Trade and Industry (ENCPC: since 2004), the Environmental Compliance Office and Sustainable Development under the Federation of the Egyptian Industries (ECO: since 2001) and various technical assistance projects delivered by the Industrial Modernization Centre (IMC).

Though it wasn't comprehensive as per the International EIP Framework, there have been several attempts in Egypt to 'partially' establish EIPs, notably: a) the Environmentally Friendly New Industrial Cities program (NICs), b) the Integrated Industrial Solid Waste Management in Egypt project (IISWM), c) Al Robbiki Leather Cluster, d) the Industrial Waste Management and SME Entrepreneurship Hub (IWEX), e) The GIZ Job Partnerships and SME Promotion in Egypt (JP-SME), f) The World Bank Upper Egypt Local Development Program (UELDP) and g) UNIDO projects like the establishment of Egypt National Cleaner Production Center (Austria and SECO), MEDTEST and SWITCHMED (EU), Industrial Energy Efficiency (GEF), Solar Heating for Industrial Process (GEF) and Industrial Motor Efficiency (GEF).

a) Environmentally Friendly New Industrial Cities program (Sakr, 2016)

The NICs Program was a national, phased program, launched in August 1998 under the auspices of the Ministry of State for Environmental Affairs. The NICs participating in the program were expected to provide productive environments for their manufacturing establishments, support activities, and inhabitants without imposing unsustainable demands on local resources and infrastructural services. The first phase, completed in December 2000, involved five industrial cities: the 10th of Ramadan, the 6th of October, El-Sadat, El-Obour, and Borg El-Arab. During 2000/2001, the program was expanded to include another seven cities and zones: Badr, New Damietta, El Saleheya, New Beni Sueif, Abou Rawash, Mubarak and El Kawthar. The industrial cities and the industrial establishments within their geographic boundaries had to comply with the requirements of Egyptian Environmental Law No. 4/1994 and other pertinent legislation. On the company level, the criterion to qualify an industrial city as 'environmentally friendly' was that at least 90% of the operating facilities would achieve full compliance with the standards of the executive regulations of Law 4/1994. The project achieved much attention and good environmental regulatory compliance in the beginning. Unfortunately, after a few years, there was a sharp decline in the companies' compliance level.

b) Integrated Industrial Solid Waste Management in Egypt project (Sakr, 2016)

The IISWM project was started in May 2001 with funding from the EU LIFE Third Countries in cooperation with the Egyptian Environmental Affairs Agency (EEAA). The objective of the project was to formulate a master plan of Integrated Industrial Solid Waste Management (IISWM) that can be readily implemented, instead of the current improper solid waste practices. The 6th of October industrial city was chosen for testing this model due to various advantages it has, such as its wide spectrum of industries and its proximity to Cairo. One of the most important outcomes of the IISWM project was the waste exchange system, the first of its kind in Egypt, to be

expanded eventually to operate at the national level. It included a database that would host all system components covering the management needs for a viable waste exchange. The database could be initially operated by EEAA. The topic was publicized through seminars, workshops, etc. throughout the project's duration. Interested parties could contact the EEAA for information or access to it via the Agency's web page. However, the program wasn't successful and was discontinued.

c) Robbiki Leather Cluster (CID, 2019; IMPA, 2019; IIE, 2019; and ElMassah, 2018)

Robbiki Leather Cluster is an ongoing project aimed to establish and implement a new advanced technology industrial district in Robbiki for tanning and leather production. It is also an example of an environmentally friendly industrial cluster. It is located between Badr City and the 10th of Ramadan city, in Robbiki suburb, 54 kilometres from Cairo with a total surface area of 1629 acres. The tanneries were originally located in Old Cairo (Magra El Ouyoun, Downtown) and were causing considerable environmental pollution. Robbiki is privately managed and regulated by Cairo for Investments and Development (CID), a company that was established in May 2016 to develop and facilitate the procurement of business licenses for investors. Robbiki has three distinctive and interconnected phases covering the leather industry manufacturing value chain and its by-products and is considered one of the important national projects in Egypt. The management model of the cluster aims to achieve the objectives of comprehensive and sustainable industrial development. The cluster encompasses three centralized effluent treatment plants on a total surface area of 1184,400 m² to grow trees on 3490,200 m² using recycled water. These structures aim to reduce waste in the city and increase the sustainability of the overall project. Robbiki was designed jointly with the Italian Association of Tanning Machinery Manufacturers (ASSOMAC). The Implementing Agency is the Industrial and Mining Projects Authority (IMPA) with a total budget of 5.5 billion EGP. Several factors are causing the slow progress of Robbiki towards a successful EIP, which include the lack of an effective site master plan, inadequate common utilities and services, and limited financial resources to support the transition of some individual firms (primarily smaller firms with fewer resources).

d) Industrial Waste Management and SME Entrepreneurship Hub (IWEX, 2019)

The Industrial Waste Management and SME Entrepreneurship Hub in Egypt (IWEX) is implemented by Egypt's National Cleaner Production Centre (ENCPC) with the support of the African Development Bank, funded by the MENA Transition Fund. IWEX aimed to establish a sustainable and integrated industrial waste exchange system on both 10th of Ramadan and the 6th of October industrial cities. This will be positioned as a Green Entrepreneurship Hub, linking industrial wastes generators, potential users and recyclers to improve cross-industry resource efficiency, promote the development of new innovative SMEs, create green job opportunities, and reduce the environmental impact of industrial waste. The IWEX project has recently (October 2019) been extended to a second phase. The new phase will focus on developing the features of the IWEX digital platform by establishing a marketplace offering two options (direct selling and bidding system). Besides, the new phase will offer assistive services to buyers and sellers such as inspection of the waste material by the Ministry of Trade and Industry for conformity, and it will provide a list of services (labs, transportation, technical advice, etc) that are needed for waste exchange.

e) The GIZ- Job Partnerships and SME Promotion in Egypt (IP-SME)

This Project has assisted several Egyptian public and private developers by providing training to park management and others on the eco-industrial park concept. The training was followed by several workshops with park management and tenant firms to understand the current situation in the industrial parks. GIZ also conducted a situational analysis of the environmental, economic, social and management aspects. Based on the findings of the gap assessments, recommended interventions were put forward in alignment with the prerequisites and performance indicators outlined in the International Framework for Eco-Industrial Parks. Based on the gap assessments, a five-year roadmap was developed during 2019-2020 for the three pilot zones to serve as a guideline for park operators on how to achieve the respective prerequisites and performance indicators, which are not yet fully achieved. For instance, one of the supported private developers started to study the feasibility of implementing solar street lighting and enhancing the waste management system in Park²².

f) The World Bank Upper Egypt Local Development Program (UELDP)

Launched in 2017, the program supports the government's efforts to develop Upper Egypt in the south of the country where development has lagged, by improving the local business environment. The Program development objective is to improve the enabling environment for private sector-led growth and strengthen local government accountability and capacity for service delivery, in selected Upper Egypt Governorates. One of the key activities under this Program is improving the management of industrial zones and accessibility of serviced industrial land in the Qena and Sohag governorates. The program designed an Industrial Zone Modernization Plan (IZMP) for each governorate. The IZMP includes an industrial zone management framework to be agreed upon between the IDA and the governorates, as well as investments and capacity building. The IZMP also includes infrastructure and services upgrading in the zones based on the revealed investor demand for improved power, water, internal roads, and other services, as well as demand for SME shells to enable entry of small enterprises without the long and costly process of land allocation. Industrial zone occupancy rates in the six industrial zones in Qena and Sohag are expected to be increased as a result of measures taken in improving the management and services of the industrial zones, as well as improvements in the business environment and support for cluster competitiveness. Industrial zone occupancy will be assessed separately for each governorate²³.

g) UNIDO Projects in Egypt: Promoting RECP and Energy Efficiency

²² Green Industry Platform: <https://www.greenindustryplatform.org/blog/giz-egypt-unleashing-potential-sustainable-industrial-areas> (accessed on 26.09.2022)

²³ World Bank <https://documents1.worldbank.org/curated/en/292181475507142347/pdf/108094-PAD-REVISED-OUO-9-Egypt-UELDP-PAD-25Aug16-Clean-final-2-08292016.pdf> (accessed 26.09.2022)

- » *Egypt National Cleaner Production Center: ENPCPC* was established in 2005 by MoTI and UNIDO as a service provider for the Egyptian Industry (funded by SECO and the Government of Austria).
- » *SWITCHMED (funded by EU)*: The SWITCHED initiative was launched in 2013 to speed up the shift to sustainable consumption and production patterns in the Southern Mediterranean, notably through the promotion of circular economy approaches.
- » *Industrial Energy Efficiency (IEE) funded by GEF*: IEE was implemented from 2013-2018 to facilitate energy efficiency improvements in the industrial sector through supporting the development and implementation of a national energy management standard and energy efficiency services for Egyptian industry as well as the creation of demonstration projects.
- » *Utilizing Solar Energy for Industrial Process Heat in Egyptian Industry (SHIP) funded by GEF*: The objective of the project is to develop the market environment for the diffusion and local manufacturing of solar energy systems for industrial process heat in key industrial sectors: Food, Textile and Chemical of great potential for solar thermal uses. The project's duration is 2015-2023.
- » *Industrial Motors Energy Efficiency Project funded by GEF*: The project tackles improving the efficiency of Electric Motor Driven Systems and accelerating the market penetration of energy-efficient motors in the industrial sector. The project's duration is 2017-2024.

2. Financial Products

Since 2015, the Central Bank of Egypt (CBE) has launched a flagship initiative for SME finance at a 5% interest rate²⁴. The CBE obliged banks to allocate 20% of their portfolio to the SME sector²⁵. It is estimated that the granting credit facilities provided to SMEs, from 2015 to 2020, amounted to EGP 213 billion; 81% of this amount has already been provided to 126,000 SMEs in the industrial, agricultural, and service sectors, in addition to more than 900,000 micro clients²⁶.

In addition, financial institutions in Egypt are increasingly interested in providing sustainable energy and resource efficiency financing to the industrial sector, which has been triggered by several donor-led programs following the Government of Egypt's energy reforms.

One of these initiatives is EBRD's Green Economy Financing Facility (GEFF) project aiming to support Egypt's green economy transition with EUR 140 million of financing for energy efficiency and small-scale renewable energy investments. It leveraged the Central Bank of Egypt (CBE) initiative to support small and medium-sized enterprises (SMEs). EBRD collaborated with several local commercial banks (i.e. QNB Al Ahli, NBK, Alex Bank). The EBRD and CBE funds have almost been fully disbursed.

The Egyptian Pollution Abatement Project (EPAP I: 1997 – 2005; EPAP II: 2006 – 2016; and EPAP III: 2017-2022) is jointly implemented among the Egyptian Environmental Affairs

²⁴ Women's entrepreneurship development assessment/ International Labour Organization, ILO DWT for North Africa and ILO Country Offices for Egypt and Eritrea. - Cairo: ILO, 2016.

²⁵ Ibid

²⁶ <https://dailynewsegypt.com/2021/02/23/banks-to-inject-egp-117bn-into-msmes-until-2022-end-cbe/>

Agency (EEAA), World Bank (WB), European Investment Bank (EIB), European Union (EU), Government of Finland, and JICA. The project provides financing for pollution abatement in private and public industrial enterprises through intermediary banks. The EPAP project introduced several pollution abatement mechanisms such as pollution prevention, the adoption of clean technology, and fuel switching (utilizing less emission fuel).

An ongoing energy efficiency dedicated fund is the Industrial Energy Efficiency Fund (IEEF), which is a collaboration between UNIDO, EEAA, and Regional Centre for Renewable Energy and Energy Efficiency (RCREE). The project is implemented in cooperation with EEAA and with the financial support of the UNIDO. RCREEE has been contracted to act as a Fund Manager. The IEEF serves as a continuation of UNIDO's project "Industrial Energy Efficiency in Egypt" (IEE Project), financed by the Global Environment Facility (GEF) and implemented during the period June 2012 to September 2018. IEEF is a financial instrument that supports the delivery of technical services to industrial facilities in Egypt to achieve energy efficiency under the "Energy Management Assistance" (EnMA) service. EnMA service will enable industries to identify their energy consumption, and costs, to support them in filling the gap towards a new improved Energy Management System.

In the context of the Solar Heating for Industrial Process (SHIP) implemented by UNIDO in close collaboration with the Ministry of Trade and Industry, a Revolving Fund has been established in 2021 jointly by the Global Environment Facility (GEF) and the National Bank of Egypt (NBE). The newly created Revolving Fund will promote using solar water heater systems in the industrial sector and alleviate the use of traditional energy in industrial processes. The Fund will contribute to achieving the general objective of the SHIP project which aims to develop the market environment for the diffusion and local manufacturing of solar energy systems for industrial process heat in key industrial sectors: Food, Textile and Chemical of great potential for solar thermal uses. The Revolving Fund is endowed with USD 4 million with a competitive interest rate starting from %3.25. It will secure loans for installing solar thermal heating systems in manufacturing industries and increase the thermal energy efficiency for the three target industrial sectors. The Fund is managed by the NBE and consists of a 50 % co-financing contribution from the GEF and a 50% commercial financing contribution from the NBE. Merging both sources to extend loans to industrial firms offers a reduction of the overall financing cost compared to normal commercial loans. It is expected that this arrangement will widen the array of alternative energy sources and mitigate the environmental impacts caused by industrial heating operations.

Furthermore, the Government of Egypt is committed to shifting to a low-carbon economy following the country's Nationally Determined Contribution (NDC) to the Paris Agreement to the United Nations Framework Convention on Climate Change (UNFCCC). The agreement emphasizes that the 'widespread diffusion of locally-appropriate low carbon energy production technologies, with substantial reductions in energy intensity' is the key to GHG emission reduction measures. National efforts are ongoing to develop sectoral low-emission development strategies (LEDS), including industry as a key sector. Subsequently, sector-transforming bankable Nationally Appropriate Mitigation Actions (NAMAs) programmes are to be designed and implemented to help achieve the NDC and catalyse climate finance to implement the identified programmes.

The IZs Operators and resident firms could leverage the above financial mechanisms, among other sources, to support the implementation of the RECP and EIP approaches in Egyptian industrial zones.

Green Bonds

Sovereign bonds

- In September 2020, Egypt became the first country in the Middle East and North Africa region to issue green sovereign bonds. Egypt issued five-year green bonds in the amount of USD500 million, at an interest rate of 5.75%. The volume of the subscription exceeded the value of the bonds seven times, prompting the government to increase the total value of the bonds to USD750 million.

The proceeds from the bond sale were allocated to finance clean transport, renewable energy, pollution prevention and control, sustainable drinking water and sanitation management, energy efficiency, and adaptation to climate change.

Non-sovereign bonds:

- Prime Minister's Decision No. (3456) of 2022 was issued to amend some provisions of the Executive Regulations of the Capital Market Law, which was published in the Official Gazette in Issue No. 38 bis (a). It included the introduction of new types of bonds for private sector companies, namely, Sustainable development bonds, bonds related to sustainable development, bonds with a social dimension, women empowerment bonds, climate bonds, and structural (transitional) bonds.

6. ASSESSMENT OF POLICY GAPS



6. Assessments of Policy Gaps

This section discusses EIP policy and regulatory gaps to facilitate the better design of the national EIP framework in Egypt. Policy gaps might include a lack of appropriate and enforceable policies and regulations to encourage EIP development; potential conflicts between existing regulations and policy initiatives; a lack of transparency surrounding industrial regulations and enforcement; or the limited ability of stakeholders to transpose privileged regulatory frameworks into industrial parks. Defining policy and regulatory gaps may also contribute to the identification of needs for modification of the regulatory framework and/or legal provisions.

To promote EIPs, policies and regulations should address the four categories of EIP performance²⁷:

- » Park Management Performance, specifically concerning management and monitoring. This includes investing in better infrastructure; applying national/international standards; organizing and managing services (including disaster preparedness and risk management), and marketing. Policies and regulations should empower the role of park operators to manage EIPs efficiently and effectively.
- » Environmental Performance by minimizing the footprints of parks, by providing sustainable means to manage water, wastewater, waste, and resources. It also involves addressing climate change issues and their effects on local and global environments. Policies and regulations about environmental performance include national and local regulations related to climate change, sustainability, energy and resource efficiency, water treatment, ecosystem services, environmental impact assessments, and disaster risk management (DRM), with a focus on those regulations relevant to industrial parks.
- » Social Performance by addressing the needs of the community and employees, including labour rights and working conditions, gender, community dialogue, land acquisition and social infrastructure. Policies and regulations related to social performance include job creation and provision of training/skills for resident firms and workforce, labour law, social security law, regulations affecting gender equality within the industrial parks, etc.
- » Economic Performance by maximizing returns for park managers and business owners. Economic benefits from an industrial park include revenue and profit, job creation, and competitiveness, as well as access to additional investment for resident industries. Policies and regulations related to economic performance include FDI/exports, R&D/investments in or facilitation of technological developments and tax laws, SMEs, Zone development, market-based incentives for promoting technological innovation, industrial growth, climate change, etc.

Each of the following sub-sections provides an explanation of the performance requirements (i.e., park management, environmental, social, and economic requirements) for an industrial park to be considered an EIP, then an analysis of existing policy and

²⁷ World Bank. 2021. *International Framework for Eco-Industrial Parks v.2*. Washington, DC: World Bank. <https://www.unido.org/sites/default/files/files/2021-04/An%20international%20framework%20for%20eco-industrial%20parks%20v2.0.pdf>

regulatory gaps that hinder the implementation of the national EIP framework in Egypt is discussed.

6.1 Park Management Performance

6.1.1 EIP Prerequisites for Park Management

The park management entity needs to have measures in place to manage risks and accidents, catalyze stakeholder dialogue, provide platforms for knowledge sharing, and operate and maintain park-level infrastructure. Furthermore, it is expected to formulate environmental- and social sustainability-related strategies for the park, including collaboration with regulators, resident firms and surrounding communities. It should also set performance targets at the park level. In addition, the park management entity needs to be knowledgeable about resident firm operations (for instance, resource demands, labour requirements, waste and wastewater generation and management, administration, and so on). With this knowledge, it can guide the EIP strategy, supply shared services and promote industrial synergies.

Attention should be given to potential conflicts of interest about the roles and functions of regulators, inspectors, and the park management entity. Typically, these are not aggregated into one entity, and appropriate checks and balances are required. To fulfil its mandate, there are several considerations for the EIP park management organization:

- » **Providing Park management services:** The park manager's role is to manage and maintain infrastructure and utilities and organize and implement collective measures and services for resident firms and their employees. It should also manage risks, accidents and incidents at the park. Besides, it markets the park to new customers, preferably firms that will have synergetic operations with existing tenants. The park management entity needs to have a clear mandate to generate and/or secure sufficient financial resources to undertake its responsibilities and tasks. The residency contract should specify the responsibilities and tasks of the park management entity concerning all park operations and services. It should also outline the responsibilities and tasks of tenant firms in detail, including provisions for payments and the collection of user fees. The park management also promotes, supports, and facilitates knowledge sharing and collaboration between firms in the industrial park. Where appropriate, it explores and promotes opportunities for firm-level resource efficiency and sharing of wider benefits.
- » **Monitoring:** Monitoring is an important mechanism to track progress against EIP environmental, social and economic performance targets in a transparent and accountable manner. Residency contracts of park firms should include provisions for sharing information with the park management entity regarding compliance. This should be done by observing confidentiality and intellectual property rights. Park Management should monitor general park environmental conditions (air quality, wastewater discharge), and operate an emergency response system in case of fire, air and water contamination, etc.

6.1.2. Existing Gaps

Three policy gaps are identified:

No separation between regulatory, development and operation roles

Article 3 of Law no 95/2018 gives IDA the authority to regulate industrial zones in Egypt. This includes formulating policies and plans for industrial zones; regulating conditions of industrial zones establishment and pricing; defining activities and sectors inside industrial zones and issuing permissions for the private sector to establish and manage industrial zones. On the other hand, the Law allows IDA to develop and manage industrial zones directly, or indirectly through the private sector. This practice is not in line with the EIP requirements. Separation of roles is crucial for the effective management of EIPs. This helps avoid any potential conflicts of interest related to the roles of regulators, inspectors, and the park management entity.

Lack of park management services

At the park management level, there is no single entity responsible for zone infrastructure; and there is a lack of measures to manage risks and operate and maintain park-level infrastructure. Some industrial zones in upper and lower Egypt suffer from missing infrastructure such as sewage systems and utilities, and some infrastructure networks are not fitting with the purpose of investors²⁸. Moreover, there is often no on-site park management for many industrial zones. Findings of interviews suggest that SMEs in the Industrial Complex of EL Mahala EL Kobra suffer from park management inefficiency due to multiple infrastructure agencies. For example, the electricity company is responsible for the electricity supply, and the water company is responsible for water and sewerage networks. There is no one-stop shop to facilitate the provided services to the tenant firms. Interviewees mentioned that the IDA is responsible for the management of the EL Mahala EL Kobra Complex, but there is no on-site manager to deal with the day-to-day operations and challenges. Many park managers do not have performance targets at the park level. They do not have enough knowledge about resident firm operations.

Lack of monitoring system for parks performance

Environment Law No. 4/1994 and waste management Law 202/2020 oblige industrial firms to disclose data related to their environmental performance. This includes sharing information about wastewater discharge, ambient noise, gaseous emissions, ambient air quality, and hazardous substances and wastes. For social and economic performance, Licensing Law no. 15/2017 allows IDA to collect data on tenant firms. In addition, the investment law allows GAFI to collect all indicators related to firms' performance. Additionally, Presidential Decree No. 488/2000 gives IMC the authority to monitor industrial firms' economic and social performance. However, there is no accurate and updated data on park performance indicators. Interviews and discussions suggest that policy analysts do not have sufficient data on the economic, environmental, and social performance of the tenant firms located in the 147 industrial zones. This data challenge is amplified by the lack of strong relationships with the private sector which have accurate information on their performance. Eliciting information and data requires engaging more strongly with the private sector in an ongoing relationship, a situation which is missing in Egypt.

²⁸ Andrea Erdmann and Ayman Soliman (2018). "Egypt Industrial Zones Benchmarking", GIZ and IDA

6.2 Environmental Performance

6.2.1 EIP Prerequisites for Environmental Performance

Beyond regulatory compliance, an EIP must fulfil several important environmental considerations and requirements. Important considerations for increasing environmental performance include:

- » **Management and monitoring:** An EIP needs dedicated personnel within the park management entity to operate both environmental management systems (EMS) and energy management systems (EnMS). These systems should adhere to internationally certified standards. In addition, they should enable users to monitor park performance and support resident firms to do the same. Where appropriate, firm-level data should be aggregated and reported confidentially at the park level.
- » **Energy:** An EIP supports resident firms to improve the efficiency of industrial processes and buildings. It seeks a high level of energy efficiency in common services under the control of the park management entity. Where technically possible and cost-effective, EIPs must replace fossil fuels through the integration of low or zero-carbon/renewable electricity generation across key park infrastructure and promote its implementation to resident businesses. Common waste heat/energy distribution and utilization networks need to be in place based on an agreed rewards system for waste heat/energy provision. The formation of energy efficiency networks among resident firms needs to be encouraged by park management. EIPs should also take stock of their carbon footprint (greenhouse gas emissions). In addition, reduction targets should be set annually. Parks also need strategies to avoid or minimize GHG emissions through extended energy efficiency measures, industrial symbiosis, circular economy practices and the use of renewable energy sources encouraged by a rewards system for CO₂ emissions savings.
- » **Water supply and wastewater:** An EIP should prioritize sustainable water management, use, efficiency, and treatment. EIPs are expected to use water responsibly, taking into account local water scarcity issues, sensitive water reservoirs and non-climatic uncertainties that can shock or stress the water allocation system as a result of land use changes, demographics, or shifts in demand. An EIP should also plan to increase water efficiency for resident firms and the park as a whole. Wastewater must be treated, and water circularity promoted. Water recycling should have priority over zero liquid discharge (ZLD) systems.
- » **Waste and material use:** An EIP needs a waste management plan which also covers reduction and reuses at the park and firm levels. Resource conservation through circular economy practices should be encouraged. The park should also facilitate industrial symbiosis between industries, both within the park and outside it, and municipalities (urban industrial symbiosis). The park manager, or a designated entity, monitors and accounts for waste disposal, and ensures environmentally sound disposal. A hazardous waste monitoring system is needed to track the storage and disposal of toxic materials. On-site solutions for hazardous waste management might be considered before releasing waste into an insecure public disposal system.
- » **Climate change and the natural environment:** Climate change requires anticipating local and global effects of climate breakdown and preventing or minimizing potential damage. Thus, the management entity needs to be aware of these impacts and act to mitigate risks to the park. In this context, the EIP should seek to reduce

emissions of GHG gases, as well as air and point-source pollution. Monitoring the carbon footprints of park activities and reducing CO₂ emissions should be incorporated into the park's code of conduct and made compulsory for all resident firms.

6.2.2 Existing Gaps

Two policy gaps are identified:

Absence of proper environmental planning

Environmental planning of the IP is an important tool to plan industrial areas in the right places based on the characteristics of the surrounding environment. Considerations for the availability of appropriate and sufficient sources of water, energy and raw materials should be taken.

Restriction on solar power generation

In 2020, the Egyptian Electricity Utility and Consumer Protection Regulatory Agency (EgyptERA) issued decree No. 2/2020 on net metering rules in Egypt. This decree introduced some restrictions on net metering and self-consumption solar plants. Ahead of COP27, EgyptERA issued a new decree (6/2022) to remove some restrictions mentioned in the previous decree aiming at encouraging more solar plants under the net-metering system and the self-consumption system connected to the grid. Hereinunder the new changes introduced by the new Decree:

- (1) Removing the restriction on maximum load imposed on distribution companies concerning net-metering plants. As per the old regulation of 2020, the total installed capacity for net-metering plants connected to the grid of one distribution company could not exceed 1.5% of the maximum load of such a company as recorded during the preceding fiscal year. This maximum cap is now removed by the new Decree, which means that distribution companies are allowed to connect solar plants under the net metering scheme without limitation in terms of the total capacity.
- (2) Increasing the maximum capacity of net-metering plants allowed to be installed across the country from 300 MW to 1000 MW: This increased cap is meant to allow new green capacities to be generated under the net metering scheme.
- (3) Increasing the total capacity of all net-metering projects owned by one customer to 30MW instead of 25 MW, and the maximum capacity per project to be 25 MW instead of 20 MW.

These new changes are a good step towards encouraging solar energy in Egypt. However, there are still some existing limitations that discourage energy cogeneration and private investment in solar power.

The net metering system does not provide a real financial incentive to promote the transition to solar energy. Due to the high integration fees applied by the Decree, producers will not be able to reach the 1 GW of aggregate capacity – or even the previous 300 MW limit²⁹. In addition to that, solar producers were recently hit with a 5% import tariff on solar panels and photovoltaic cells (PVCs), both of which were previously exempt from tariffs. The tariff on PVCs will have an outsized impact on solar producers compared to integration

²⁹ <https://enterprise.press/greeneconomys/egyptera-packaging-incentives-solar-producers-ahead-cop27/>

fees and net metering regulations³⁰. Moreover, the provision of Article 5 of Decree 2/2020 is still in effect “An industrial firm is not allowed to generate electricity exceeding its annual consumption”. This situation discourages energy cogeneration and private investment in solar power.

The recent government incentives of Decree 6/2022 are positive, but more efforts are needed to remove the current restrictions and foster the transition to solar energy.

Ineffective institutional framework for creating industrial symbiosis networks

An industrial symbiosis network can be proactively created by bringing firms together around a dedicated project or programme executed by governmental agencies or park operators. Traditionally, they engage separate firms in a collective approach to exchange materials and/or by-products. Park management should play a significant role in defining opportunities for resource efficiency and sharing of wider benefits. According to Law 95/2018, IDA is responsible for industrial park management. As a park managing entity, IDA has no significant role in industrial symbiosis. Findings of interviews refer to that park managers in different zones do not facilitate knowledge sharing and collaboration between firms to create industrial symbiosis. Besides, many park managers in Egypt do not have performance targets at the park level. They do not have enough knowledge about resident firm operations. Without this knowledge, policymakers will not be able to take well-informed decisions.

Waste exchange is a core feature of industrial symbiosis. Egypt's new waste management law no. 202/2020 establishes that WMRA is to be tasked with developing a national strategy for integrated waste management and with responsibility for overseeing the regulation of the sector and attracting new investment to industrial waste processing. The mandate of WMRA is clear and sets up the legal framework for WMRA to promote industrial symbiosis. However, WMRA is still in its early stages. It does not have the capacities required to manage industrial symbiosis. It lacks resources (a sufficient number of people with requisite skills and experience, operational and investment funding, tools and equipment, etc.), appropriate operational procedures and processes, and monitoring and evaluation systems, including indicators and guidelines for industrial symbiosis in Egypt. Thus, it needs a dedicated technical assistance programme to be able to carry out its mandate.

6.3 Social Performance

6.3.1 EIP Prerequisites for Social Performance

Apart from national regulatory compliance, an EIP must fulfil several important considerations and social requirements. Important considerations for improving the social performance in an EIP include:

- » Social management systems: Customized and fit-for-purpose management systems are required at the park and firm levels to address relevant social, Occupational Health and Safety (OHS) and grievance procedures and impacts. These should be based on a continuous improvement process approach. The improvement of conditions for workers in industrial parks is also an important concern to address as part of the OH&S management system. Furthermore, all workers have the right to decent work – fairly paid, productive work for women and men, carried out in

³⁰ Ibid

conditions of freedom, equity, security and dignity. In industrial parks, working hours, working conditions, compensation, and annual and maternity leave must be, at a minimum, in line with national and sectoral norms. The risk of job losses due to changing technologies in production and manufacturing processes should be countered by industrial parks through the re- and up-skilling of workers.

- » Social infrastructure: Essential social infrastructure should be provided in industrial parks or their surroundings to support workers and the local community. Primary social infrastructure should cover local shops, restaurants/ cafeterias, recreation areas, medical facilities, training centres, banks, post offices, and emergency fire facilities. This social infrastructure improves the living and working conditions of employees and neighbouring communities and should pay special attention to gender equality, security, crime prevention, and human resource development.
- » Local community dialogue and outreach: International experience shows that the engagement of firms in community activities can lead to positive outcomes such as strengthening trust and relationships between industries and local communities.

6.3.2 Existing Gaps

Four policy gaps are identified:

Poor working conditions of some informal employees

The Egyptian Constitution and labour law 12/2003 ensure the right to work and includes different provisions to protect labour rights such as fair wages, compensations, annual leaves, family responsibilities, health and safety, trade unions, and striking peacefully when working conditions are problematic. The Constitution also guarantees equality between men and women in all spheres, including in the workplace³¹. Nevertheless, labour conditions in Egypt remain problematic in the growing informal sector. The Economic Census of 2018 reported that the informal economy in the manufacturing sector represents 53.7% of the number of manufacturing firms³². Additionally, the share of precarious jobs (absence of a legal contract, pension or health coverage) has been on the rise; precarious work increased from 39.6% in FY2008/09 to 53.7% by FY2017/18³³.

Informal workers often suffer from poor working conditions, low wages, inflexible hours, unfair dismissals, and lack of insurance and social security³⁴. According to CAMPAS' report on decent work, the permanent employees in the private sector – informal - represent only 31.9%. Data on private sector employees inside establishments reveal that 36.3% have social insurance, 28.7% have health insurance, and 36% enjoy legal contracts³⁵. Yet, more vulnerable jobs are found in private sector employees outside establishments where only 10.6% have social insurance, 3.9% have health insurance and 1.6% have legal contact³⁶. This confirms informal employees' vulnerability in the labour market.

³¹ Ahmad I, Medhat R (2021) Egypt Decent Work Check 2021. Amsterdam, WageIndicator Foundation.

³² The Central Agency of Public Mobilization and Statistics (2018). Economic Census of Egypt 2017/2018.

³³ International Labour Organization (2022). The Impact of Trade and Investment Policies on Productive and Decent Work: Country Report for Egypt

³⁴ Ibid

³⁵ CAMPAS Report on Decent Work, available at: [Campas Report on Decent Work](#)

³⁶ Ibid

Low protection from arbitrary dismissal in law

Legal protection against arbitrary dismissal is considered a basic component of decent work which guarantees a decent life for workers and their independents. Although the Egyptian Constitution prohibits arbitrary dismissal, it does not provide a clear definition of what an arbitrary dismissal entails. Additionally, Labour Law 12/ 2003 defines lawful reasons and unlawful reasons for terminating employment. However, the Law does explicitly prohibit “arbitrary dismissal”. It is unlawful to terminate employment based on “colour, gender, social status, family responsibilities, pregnancy, religion, political opinion, filing a complaint or lawsuit against the employer, the worker’s membership or activities in a union within the dictates of the laws”, or maternity leave, or because of illness (Articles 120, 92 and 127 respectively)³⁷. The law requires employers to notify workers two or three months before termination, during which period workers are allowed eight hours of leave per week to search for employment opportunities. Article 71 of Law 12/2003 allows workers to appeal a dismissal before a judicial committee consisting of two judges, the director of the Manpower Directorate Union, a member of the Egyptian Labour Unions’ Federation and a member of the concerned employers’ organization. The workers can appeal the decision of the committee at the court of appeals³⁸. Since the legal framework does not define and explicitly prohibit the act of arbitrary dismissal and the grounds on which dismissal is prohibited, many workers in the manufacturing sector are still at risk.

Challenges to the right to organize

According to the ILO Convention on the freedom of association and protection of the right to organize, employees have the right to form trade unions which negotiate with employers on the terms of employment without hindrance; the freedom of a trade union to negotiate with employers to try and conclude collective agreements is protected. The legal protection of the right to organize is a guarantee of freedom that ensures workers’ ability to establish trade unions and carry out trade union activities. Trade unions play a central role in protecting their interests and contributing to building and sustaining the decent working conditions that every individual in society needs to enjoy an adequate standard of living for themselves and their dependents.

The Egyptian Constitution guarantees the right to organize. Article 76 stipulates "the establishment of trade unions and federations on a democratic basis is a right guaranteed by law". Article 4 of Law 213/ 2017 ensures the right to form trade unions, without discrimination, as well as the freedom to join or withdraw from them³⁹. Nevertheless, the Law restricts trade union pluralism; the formation of more than one union in the same workplace is prohibited. The lack of trade union pluralism means that workers in the sectors where the Egyptian Trade Union Federation (ETUF) has a presence are unable to establish independent unions, resulting in the monopolization of trade union activity, which the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) has condemned⁴⁰. Moreover, article 42 of the bylaws that complement Law 213 (2017) prevents uninsured workers from joining independent trade unions that reconcile their status according to the new regulation of Law⁴¹. These provisions hinder the right to organize for employees in the manufacturing sector, which negatively

³⁷ Egypt Social Progress Indicators [Protection from arbitrary dismissal in law | Labor | Egypt Social Progress Indicators \(progressegypt.org\)](https://progressegypt.org)

³⁸ Ibid

³⁹ Ibid

⁴⁰ Ibid

⁴¹ Ibid

affects their ability to negotiate with employers and promote decent work conditions inside industrial parks.

Gender-blind industrial policies and strategies

Despite the considerable political support at the highest levels for women's economic empowerment in Egypt, industrial policies and strategies are delivered without a gender lens. Women's level of participation in the manufacturing sector is still low.

Analysis of Section 4.2 of this report finds that there is a persistently high gender gap in the manufacturing sector. Male employment in the industrial sector accounts for 33% of total male employment, while female employment in the industry represents only 8% of total female employment. Comparing Egypt to other countries, we find that Egypt is lagging behind different countries in the region, as female employment in industry in Tunisia is 32%, Turkey 17% and Morocco 13% respectively. The adopted industrial policies and strategies in Egypt are gender-blind. They do not address many barriers that women face such as the disproportionate share of childcare and household responsibilities that are difficult to reconcile with working hours; the high cost of childcare; poor working conditions in the growing informal private sector; poor enforcement of laws barring discrimination and sexual harassment in the workplace and public spaces, including public transportation; and a persistently high wage gap compared with men in the private sector⁴². Moreover, the public sector continues to be more attractive to women employees as they provide a higher share of formal and stable jobs. Thus, women are generally employed to a larger extent in the public sector⁴³.

In addition to that, some provisions that promote gender equality might adversely affect women's employment. For example, the Labour Law 12/2003 allows women employees who have worked in an organization for 10 months to take maternity leave for 90 days, receiving full financial compensation during their leave; Maternity leave is available twice during a term of employment with the same employer; the employer cannot fire a woman during her maternity leave; moreover, women have the right to take unpaid child care leave for a period not exceeding two years, and can do this twice during their service. Up until 24 months of the child's birth date, women have the right to a 30-minute breastfeeding break twice a day, with an option of joining the two periods.⁴⁴ Although these articles are meant to protect women employees, the private sector, especially SMEs, perceives those provisions as a burden, so they prefer hiring men to avoid any additional cost.

The Labour Law does not provide a clear definition of discrimination in the workplace that conforms with international standards⁴⁵. Article 88 of Law 12 of 2003 states that all its provisions apply equally to male and female workers, without discrimination. The law does not mention any special prohibition of discrimination against working women due to their social status or prohibits discrimination based on women's family responsibilities. Nothing stops employers, for example, from basing their employment decision on a woman's reply to the employer's question if she wishes to have children.

⁴² Constant, Louay, Ifeanyi Edochie, Peter Glick, Jeffrey Martini, and Chandra Garber, Barriers to Employment That Women Face in Egypt: Policy Challenges and Considerations. Santa Monica, CA: RAND Corporation, 2020. https://www.rand.org/pubs/research_reports/RR2868.html

⁴³ International Labour Organization (2022). The Impact of Trade and Investment Policies on Productive and Decent Work: Country Report for Egypt

⁴⁴ Women's entrepreneurship development assessment/ International Labour Organization, ILO DWT for North Africa and ILO Country Offices for Egypt and Eritrea. - Cairo: ILO, 2016.

⁴⁵ [Protection for women against discrimination at the workplace | Labor | Egypt Social Progress Indicators \(progressegypt.org\)](https://www.progressegypt.org/)

6.4. Economic Performance

6.4.1. EIP Prerequisites for Economic Performance

Industrial parks are an important vehicle used by governments to boost manufacturing sectors and add value to economies. In the planning phase, the proposed park infrastructure needs to be designed to respond to market demand and future development needs. EIPs offer important synergies between resource and energy efficiency processes and socially compliant practices providing economic gains and competitive advantages. The industrial parks may use green incentive structures to attract high-quality investors, thereby making it easier to comply with EIP targets during operations. Apart from national regulatory compliance, an EIP must fulfil several important considerations and economic requirements. Important economic considerations for EIPs are as follows:

- » Employment generation: Industrial parks create employment. How sustainably be managed and driven sustainably to ensure: economic linkages are maximized; employees and surrounding communities duly benefit; and diversity and inclusiveness of employment are maintained. Future trends towards automation and the adoption of AI need to be synchronized with social demands and job creation.
- » Local businesses, SME promotion and linkages: SMEs are the backbone of the economy and employment in many countries. EIPs provide opportunities for the establishment of SMEs in parks that can, in turn, provide services, parts and components, and add value to other (larger) industries operating in the park. EIPs can also provide strong economic development benefits through the promotion of linkages with local businesses as suppliers to the industrial park and its resident firms.
- » Economic value creation: International experience demonstrates that some industrial parks are developed without establishing market demand for their services, or the role of green infrastructure in competitiveness. As a result, they may not be competitive. Integrating cost-effective, energy-efficient technologies and management processes can provide competitive advantages. “Investment-ready” industrial parks are more attractive, as they present lower risks and investment costs to firms (for example, through the provision of infrastructure, utilities, and services).
- » Financial viability: The decision to develop a park to EIP standards will be influenced by expected returns on investment and available modes of finance. A financial model will expedite decision-making. It will clarify the financial viability of the investment by matching the chosen financing modality and sources with the anticipated pricing of services to be delivered.

6.4.2. Existing Gaps

Four policy gaps are identified:

Lack of measures to address the need for technology upgrading of industrial zones

The analysis suggests that there is a lack of measures aimed at maximizing the economic performance of industrial zones in terms of technology upgrading. Enhancing the economic performance of industrial zones and enhancing their contribution to manufacturing value

added requires concerted action to boost the role of technology in industrial activities and achieve a progressive shift from low to medium and high-tech industries and eventually leading to greater value addition. Statistics suggest that the share of MHT industries decreased from 36% in 2000 to 20.9% in 2019⁴⁶. One of the main policy gaps related to EIP in Egypt is the absence of such a policy that encourages demand for innovation which is considered the main catalyst of technology upgrading. It is innovation and technology that enable restructuring and productivity growth of industrial zones.

Innovation in Egypt is not constrained only on the supply side, but also on the demand side. It is not only the lack of trained scientists and engineers, absence of R&D labs, or inadequate protection of intellectual property that restricts the innovations that are needed to restructure the economy; Innovation is undercut instead by lack of demand from its potential users in the real economy—the entrepreneurs⁴⁷. The demand for innovation is low in turn because entrepreneurs perceive new activities to be of low profitability. When we put ourselves in the shoes of an entrepreneur engaged in cost discovery, we immediately see the key problem: this is an activity that has great social value and yet is very poorly remunerated⁴⁸.

If the entrepreneurs fail in their venture, they bear the full cost of the failure. If they are successful, they must share the value of their discovery with other producers who can follow their example and flock to the new activity. In the limit, with free entry, entrepreneurship of this kind produces private costs and social gains. It is no great surprise that the country is not teeming with entrepreneurs engaged in self-discovery.

Weak linkage of MSMEs suppliers, large corporations and FDIs

Although SMEs dominate the manufacturing sector in Egypt, there is a weak linkage between large corporations and FDIs. According to the Economic Census of 2017/2018, 99% of the manufacturing firms in Egypt are MSMEs. On the other hand, a high portion of raw materials and capital goods are imported. The imports of raw materials, supplies and capital goods accounted for 61% of Egypt's imports in 2021⁴⁹. This refers to the high dependency on imports and absence of effective linkages of MSMEs, large firms and FDIs as reflected in, for example, long-term and stable supplier or distribution agreements with a buyer/retailer or a raw material supplier.

In response to the weak linkage problem, in 2015, the Government of Egypt issued Law No. 5/2015 on the Egyptian Industrial Product Preference in Government Contracts. This Law gives preference in government procurement for locally manufactured products. The Law states that products of Egyptian origin should be given preferential treatment when obtaining government contracts i.e., contracts issued by public entities and enterprises in which the state of Egypt is a shareholder⁵⁰. However, the Law is not fully enforced. Many manufacturers claimed that they did not benefit from this privilege as many public enterprises are not committed to adopting the Law. Thus, in 2018, the Government amended the Law to increase the penalty for non-compliance with the law. Nevertheless, there are still some challenges related to the quality and availability of local products.

⁴⁶ UNIDO SDG Indicators: <https://stat.unido.org/SDG>

⁴⁷ Rodrik, D. 2004. INDUSTRIAL POLICY FOR THE TWENTY-FIRST CENTURY, Harvard University

⁴⁸ Ibid

⁴⁹ The General Organization for Import and Export Control (2022). Egyptian non-petroleum Foreign Trade Monthly Digest.

⁵⁰ <https://www.globaltradealert.org/intervention/55895/public-procurement-preference-margin/egypt-the-introduction-of-a-preferential-treatment-for-local-products-in-government-contract>

In addition to that, there are no concrete measures to strengthen linkages between SMEs, private corporations and FDIs. Recently, the Government of Egypt announced a new initiative named “EBDA” to help accelerate the localization of industrial production and lower the country’s reliance on imported goods. The initiative includes three pillars: i) **Mega Projects** which aims to attract investments to the manufacturing sector and promote feeding industries; ii) **Training, Research and Development** which aims at facilitating technology transfer and enhancing the quality infrastructure; and iii) **Supporting Industry** which aims to provide financial and non-financial support to factories that are struggling or in default and support localization of industry in all governorates⁵¹. The initiative is in line with the EIPs concept; however, it is still in its early stage and did not have a real impact on tenant firms in different industrial parks across Egypt.

High regional disparities of EIPs

Another important gap is the lack of actions that address regional disparities in the industrial zones. This negatively affects employment opportunities generated in the areas in which EIP operates to ensure revenue linkages and development opportunities. In general, the level of inequalities in Egypt is existing and is a major driver of under-performance in social outcomes and human development indicators. These are transparent in employment outcomes such as unemployment rates where some governorates have very high unemployment rates compared to the average. In 2021, the CAMPAS statistics referred to that unemployment rates in North Sinai was 33.6%, Port Said (25.2%), Red Sea (23.6%), and New Valley (14.2%), while the average unemployment rate was 7.4%⁵². These high economic regional inequalities can indubitably be linked to disparities in industrial intensity and capabilities. The diagnostics study of the UNIDO Programme for Country Partnership (PCP) of Egypt reported that remote governorates, rather than Cairo and Alexandria, are less advantaged in human development and manufacturing intensity.

Operationalize incentives for fostering green industries

In March 2022, the Prime Minister approved a package of incentives to support the green economy and artificial intelligence projects. It was approved to grant tax incentives – as per Investment Law No. 72- to enterprises engaged in the electricity and renewable energy business including those projects that produce, store, and export green hydrogen and green ammonia, as well as other industrial projects that produce environment-friendly alternatives to single-use plastic products. Another decree was passed to the effect that the non-tax incentives stipulated in the Investment Law are to be granted and put into practice. These incentives are the same as incentives given to other sectors mentioned in articles 10 to 13 of Investment Law 72/2017. The analysis shows that there is no further stimulus provided to industrial firms to be compliant with the EIPs requirements. For example, local Solar Water Heating (SWH) factories buy their raw materials and input components at relatively high costs; there is no tariff advantage on the SWH components; this high cost negatively affects the competitiveness of the SWH producers in Egypt⁵³. Besides, there is no specific HS code in the Egyptian Customs system for the SWH components which hinders differentiating between them and other traditional components. Furthermore, there are no green financial products offered at scale. The EPAP

⁵¹ The National Initiative of Developing Egyptian Industry (Ebda): <https://ebda.com.eg/aboutus>

⁵² The Central Agency for General Mobilization and Statistics (CAMPAS): https://www.capmas.gov.eg/Pages/IndicatorsPage.aspx?Ind_id=1118 (accessed on 03-11-2022)

⁵³ UNIDO (2020). Roadmap for strengthening the quality of locally manufactured products and components related to solar water heaters and solar thermal technologies in Egypt.

financial products focus mainly on compliance with environmental law targeting big companies. It does not provide incentives for industrial firms to move beyond compliance to adopt circular economy practices and RECP technologies.

To conclude this section, there are several policies and regulations in Egypt that could be leveraged to promote EIPs. However, more work is needed to create an enabling environment and address the existing gaps. The policy gaps involve (i) Park Management Performance: No separation between regulatory, development and operation roles; lack of park management services and lack of monitoring system for parks performance. (ii) Environmental Performance: Restriction on solar power generation and ineffective institutional framework for creating industrial symbiosis networks. (iii) Social Performance: Poor working conditions of informal employees; low protection from arbitrary dismissal in law; obstacles to the right to organize; and gender-blind industrial policies and strategies. (iv) Economic Performance: Lack of measures to address the need for technology upgrading of industrial zones; weak linkage of MSMEs suppliers, large corporations and FDIs; high regional disparities of EIPs; and lack of incentives for fostering green industries.



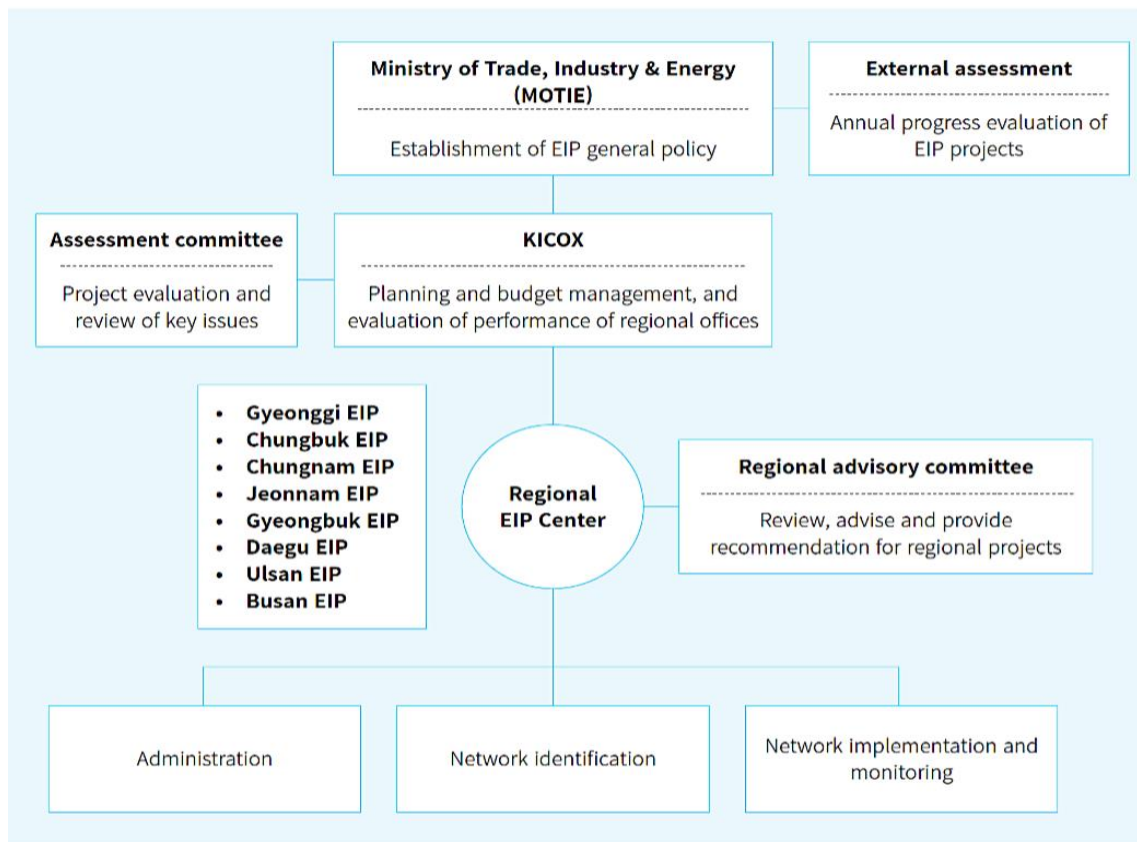
7. RECOMMENDATIONS

7. Recommendations

- 1- EIPs Policy:** Set up an effective policy framework to foster the planning, development and implementation of EIPs. The EIPs policy process includes inputs from various stakeholders representing a wide range of interests and topics such as park management structures, RECP, industrial symbiosis and social infrastructure. Thus, it is crucial to consider the following success factors when developing an EIP policy: raising awareness of all stakeholders, gaining support at the highest political level, pursuing a participatory approach, working with change agents, focusing on priority interventions and setting up a strong M&E framework. The EIPs policy should include ambitious targets on the number of EIPs; propose clear actions to improve data collection and analysis systems to track EIP performance; improve enforcement mechanisms of existing regulations; and develop more green financial products for EIP promotion. In addition to the EIP policy, it is important to issue a Prime Minister decree introducing EIP principles, industrial symbiosis as well as incentives and criteria for industrial zones to be considered as EIPs.

- 2- Governance Structure:** The governance challenges need to be addressed through comprehensive institutional reform. The Government needs to assign an agency to take the responsibility of coordination with stakeholders such as ministries, public institutions, park developers, operators, and resident firms, as well as business service providers, engineers, consultants, operations and maintenance professionals, equipment suppliers, financiers, academic institutes, and vocational training centres. IDA should be capacitated and strengthened to be able to develop an EIP policy, manage the planning and budget of EIPs, oversee and monitor the implementation of the EIPs framework, and evaluate the EIPs feasibility studies prepared and submitted by industrial park developers and operators. Besides, the roles of regulators should be separated from the roles of developers and operators to avoid any conflict of interest. Establishing EIP centres in key priority zones in Egypt could help identify EIP opportunities and evaluate their relevance to the EIP policy. About prevailing best practices, the below figure shows the governance structure and organizational reform that took place in South Korea after the change of supervisory body from the Korean National Cleaner Production Center to the Korea Industrial Complex Corporation (KICOX). While KICOX plays a supervisory role for the entire process, five regional EIP centres perform administration of the overall project development process, cooperating with an advisory board. All projects approved for implementation at a regional centre are evaluated monthly by an assessment committee.

Figure 6. Governance Structure and Organizational Reform of EIP in South Korea



Source: Park et al. (2016)

- 3- Training, Capacity Building and Institutional Support:** Provide training and capacity-building programmes to national institutions to promote the EIP approach in Egypt. The UNIDO e-learning materials, guidelines and tools could be leveraged in that regard. It is recommended to translate them into Arabic. Specific focus is needed to equip national institutions with the necessary tools to enforce such regulations. For example, the GEIPP could provide institutional support to WMRA to fulfil its mandate as per law 202/2020 with a specific focus on creating industrial symbiosis networks. Other related institutions should be involved such as IDA, IMC, ENCPC, EEAA and FEI-ECO. The scope of this support is to include the following three steps: **i)** Identify potential opportunities to create an industrial symbiosis network; **ii)** Implement feasibility assessments and verify EIP opportunities; **iii)** Launch and develop a business case. It is important to take stock of relevant ongoing efforts. For example, the Egyptian Industrial Waste Exchange initiative achieved good results in creating transactions of 200 tonnes of industrial waste in a very short period. Strategizing with partners on possible initiatives will help in consolidating efforts for upscaling
- 4- Solar Energy:** It is important to remove any restrictions on solar power generated by industrial firms. Flexibility to adapt industrial and energy regulations to induce green growth is fundamental to enhancing the establishment of EIPs and enabling the transformation of industrial parks into EIPs. The government can pursue a market-oriented policy where the private sector plays a more competitive role. It is

recommended to make the net metering financially viable by decreasing the integration fees. This will help producers to reach the 1 GW of aggregate capacity that was announced by the Egypt ERA. In addition to that, remove or decrease the 5% import tariff on solar panels and photovoltaic cells (PVCs).

- 5- Green Incentives:** A combination of green incentives to be considered in Egypt such as the tax on resource use, tariff exemptions for resource-efficient products, or trading schemes. The application of these incentives could create an enabling system which obliges resource users to pay an additional amount to reflect the social cost associated with resource use or receive a subsidy to reflect the social benefit associated with reducing resource use. To offer tariff exemptions for inputs and components of resource-efficient products, it is crucial to create clear HS codes for them. The Customs Authority should develop a system distinguishing green products from traditional ones. Furthermore, industrial SMEs need more green financial products at scale to encourage them to adopt RECP practices. The CBE's initiative of SMEs lending at a five per cent interest rate is a good example that could be leveraged to encourage green SMEs and the EIP approach. This could create significant contributions to improving the competitiveness of locally manufactured green products.

- 6- Decent Work:** To improve work conditions inside industrial zones in Egypt, the government should coordinate better with the private sector to effectively adopt policies that generate decent employment opportunities. It is recommended that Laws 12 and 213 be amended to take into consideration the norms of the International Labor Organization. It is important to ensure the pluralism of trade unions and define and explicitly prohibit the act of arbitrary dismissal and the grounds on which dismissal is prohibited. In addition to that, the country should allocate more resources towards adequate unemployment benefits to support people from becoming destitute at any time, especially after COVID-19. Additionally, actions must be taken to ensure equal pay.

- 7- Linkages between SMEs, large corporations and FDI:** Given the availability of several megaprojects, undertaken by multinational corporations, state-owned enterprises or large domestic enterprises, there is a great and untapped opportunity to improve the linkages between these large companies/projects and Egyptian SMEs of industrial zones. It is recommended to strengthen ongoing matchmaking initiatives between large companies (buyers) and SMEs in different industrial zones. UNIDO has a well-tested methodology embedded in its Subcontracting and Partnership Exchange (SPX) Programme⁵⁴, where buyers' needs are identified, and SMEs are profiled against those needs in terms of their capacities and supply capabilities. The dual goal of the SPX is to facilitate subcontracts/outsourcing between buyers and SMEs to reduce imports of goods that could be sourced in Egypt, as well as to identify and address gaps in SMEs so that they can win contracts with international companies and become competitive in the global market.

⁵⁴ More information on the SPX is available here: <http://spx.unido.org/spx/default2.aspx>; Notable success of the SPX methodology has been demonstrated in e.g. Cameroon, where the SPX recently reported that it had facilitated contracts between large buyers and SMEs to the value of USD 84 million. Similar positive results have been demonstrated in South Africa and Turkey.

- 8- Technological Capabilities:** Egypt should aim to increase the share of MHT industries in its manufacturing sector by attracting FDI to sophisticated industries in different industrial zones. Attracting FDI is a key mechanism for gaining access to advanced technologies and knowledge of more efficient industrial processes. However, embracing modern technologies is not possible without the presence of an adequately skilled workforce. In light of growing tensions in the global trade system and the ongoing COVID-19 pandemic, Egypt has been cited as a potential beneficiary of nearshoring, the projected medium- to long-term trend towards regionalization of existing value chains. Strategic mobilization of high-tech FDI in industrial zones in Egypt is vital and should be coupled with a strong focus on industries with growth potential to ensure that investment is most effective and local benefits of industrial zones are maximized.
- 9- The strategic location of Egypt:** Egypt has a strategic geographic location and there are several industrial parks located in the Suez Canal's navigation stream which could be an opportunity for investments and a potential for EIPs. There are government efforts to produce and market green hydrogen which the IZ (like SCZONE) have started to capitalize on.

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Environment Law 4/1994 amended by law 9/2009

Industrial Development Authority (IDA) Law 95/2018

Industrial Licenses Law 15/2017

Investment Law 72/2017

Labour Law 12/2003

MSMEs Law 152/2020

Special Economic Zones Law No. 83 of 2002

Waste Management Regulatory Law 202/2020

Annex I

List of stakeholders interviewed in 2022

Entity	Name	Position
Industrial Development Authority (IDA)	Ms. Tasneem Khalil	Chairman Counselor for Development
	Ms. Hala Abdel Gawad	General Manager for the Environmental Protection Department
	Eng. Amani El Asar	Manager of El Robbiki Leather City at IDA
	Eng. Nancy Hablusi	Urban Planning Engineer
	Eng. Mohamed Negm	Energy Efficiency Unit
	Ms. Dina Ibrahim	Legal Department
	Ms. Sara Ibrahim	International Cooperation Senior Specialist
General Authority for Suez Canal Economic Zone	Mr. Waleid Gamal Eldein	Chairman
	Ms. Amany Kamal Essawi	Advisor to the Chairman for International Relations
The General Authority for Investments	Dr. Eman Mansour	Head of Policy Sector
	Mr. Amr Nour El Din	Legal Advisor of the CEO, Head of Europe & America in promotion Sector
	Ms. Dina Safwat	Assistant to the Legal Advisor of the CEO
EEAA - Central Department for Protection and Development of the Industrial Environment and Energy	Dr. Ahlam Farouk	Head of Central Department
	Chemist. Sawsan Farouk	Cleaner Production Department Head
	Eng. Mahmoud Abdel Hafez	Head of General Department for Technical Industrial Support and Foreign Projects
EEAA – EPAP III	Mr. Philip Jago	Team Leader
WMRA	Dr. Nagwa El Kawary	Senior Adviser to the Minister for Waste

	Eng. Yasmeen Sayed	Environmental Engineer
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Annex II

List of industrial zones in Egypt, as received from IDA



المناطق الصناعية / الاستثمارية المعتمدة على مستوى الجمهورية حتى تاريخه



رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقاً للقرار
1	القاهرة	1	المنطقة الصناعية بالشرط الخامس بزهره المعادي	محافظات	الإششاء : قرار محافظ رقم 186 لسنة 1979 التعديل : قرار محافظ رقم 44 لسنة 1990	60
2		المنطقة الصناعية ارض عماد نصر ك 18	محافظات	قرار محافظ رقم 199 لسنة 1989	33	
3		المنطقة الصناعية بحي العرج	محافظات	قرار محافظ رقم 1781 لسنة 2005 قرار محافظ رقم 10464 لسنة 2018 (اعتماد مخطط التنمية العمرانية لحي العرج)	(**)	
4		المنطقة الصناعية بمنطقة الإحلال والتجديد والمحصورة بين ش جوزيف تينو وسكة حديد السويس- حي الزهراء (*)	محافظات	قرار محافظ رقم 242 لسنة 1989	(**)	
5		المنطقة الصناعية ب 19 والمحصورة بين سكة حديد جسر السويس وش جسر السويس- حي الزهراء (*)	محافظات	قرار محافظ رقم 1292 لسنة 1975	(**)	
6		المنطقة الصناعية كيلو 6,5 مينية السلام- حي الزهراء (*)	محافظات	قرار محافظ رقم 1292 لسنة 1975	(**)	
7		المنطقة الصناعية شق الثعبان بطره	محافظات	قرار محافظ رقم 672 لسنة 1999	40	
8		المنطقة الصناعية بجنوب حلوان	محافظات	قرار محافظ رقم 718 لسنة 1998 قرار محافظ رقم 742 لسنة 2002	15	
9		المنطقة الصناعية بالقطامية - حي البساتين	محافظات	قرار محافظ رقم 668 لسنة 1999	83	
10		البساتين العمومي- حي البساتين	محافظات	قرار محافظ رقم 388 لسنة 2001	(**)	
11		المنطقة الصناعية كيلو 17- حي السلام اول	محافظات	قرار محافظ 129 لسنة 1975	(**)	
12		المنطقة الصناعية بجوار سوق العيور	محافظات	قرار جمهوري رقم 312 لسنة 1993 قرار محافظ رقم 1508 لسنة 2000	77.07	
13		المنطقة الصناعية بالعجاسة - قسم الوايلي	محافظات	قرار رقم 836 لسنة 1957	30	
14		المنطقة الصناعية التبين (ارض البودرة/ كفر الطوف)	محافظات	قرار محافظ رقم 347 لسنة 1967 قرار محافظ رقم 505 لسنة 2000	428	
15		منطقة بشرق التوسراده مصر / حلوان (بوادي حوف- تقسيم ايكون حي المصرة)	محافظات	قرار محافظ رقم 222 لسنة 1978	150	
16		المنطقة الحرة العامة بمدينة نصر	الهيئة العامة للاستثمار والمناطق الحرة	قرار جمهوري رقم 2038 لسنة 1973	180	
17		المجمع الصناعي المنطقة الصناعية بمدينة بدر بمساحة 2316 فدان	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 335 لسنة 1982	21.43 2294.57	
18		منطقة الصناعات الصغيرة - والجديدة بمدينة 15 مايو	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 119 لسنة 1978	371	
19		المنطقة الصناعية بالقاهرة الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 191 لسنة 2000	1090	
20		المنطقة الصناعية بالشروق	هيئة المجتمعات العمرانية الجديدة		33	
21		المنطقة الصناعية بالروبيكي (بمساحة اجمالية 426 فدان)	الهيئة العامة للتنمية الصناعية	الإششاء : قرار محافظ رقم 161 لسنة 1995 التعديل : قرار جمهوري رقم 184 لسنة 2014 التعديل: قرار رئيس مجلس الوزراء رقم 1622 لسنة 2015 التعديل: قرار جمهوري رقم 115 لسنة 2018 التعديل : قرار جمهوري رقم 617 لسنة 2019 التعديل: قرار جمهوري رقم 61 لسنة 2022	176 109 141	
22		المنطقة الصناعية بالروبيكي (ب)	الهيئة العامة للتنمية الصناعية	الإششاء: قرار جمهوري رقم 115 لسنة 2018 التعديل: قرار جمهوري رقم 617 لسنة 2019	282.03	

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالغدان) وفقا للقرار
23	القليوبية	23	أبي زعل مركز الخانكة (منطقة الشروق الصناعية)	محافظات	الإشباع: قرار رئيس مجلس الوزراء رقم 4309 لسنة 1999 الإستناد: قرار محافظ القليوبية رقم 35 لسنة 2010	149.5
24		24	حوض الزهار نمره 27 (منطقة الصفا الصناعية للمساكن)	محافظات	قرار محافظ رقم 134 لسنة 2000	142
25		25	المنطقة الصناعية بالعكرشة	محافظات	الإشباع: قرار محافظ رقم 208 لسنة 2008 التعديل: قرار جمهوري رقم 555 لسنة 2020	494.4
26		26	المنطقة الصناعية بجهة ابو زعل - مركز الخانكة (ارض جمعية النصر)	محافظات	الإشباع: قرار جمهوري رقم 210 لسنة 2017	738.84
27		27	المنطقة الصناعية بمدينة العور	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 1290 لسنة 1982	4066
28		28	منطقة استثمارية بنها بناحية الفروقية عزبة نجيب	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 2424 لسنة 2016	46
29	الجيزة	29	المنطقة الصناعية بأبو رواش وتوسعاتها	محافظات	الإشباع: قرار جمهوري رقم 41 لسنة 1992 الإستناد: قرار محافظ رقم 2065 لسنة 1996 الإستناد: قرار رئيس مجلس الوزراء بتاريخ 2002/5/26	1404
30		30	المنطقة الصناعية ناحية وصلة جزا مركز العياط	محافظات	الإشباع: قرار جمهوري رقم 254 لسنة 2017	1785.75
31		31	المنطقة الصناعية ناحية عرب ابو ساعد (*)	محافظات	الإشباع: قرار جمهوري رقم 618 لسنة 2020 قرار محافظ رقم 832 لسنة 2021	6328.69
32		32	المنطقة الحرة العامة الإعلامية بمدينة 6 أكتوبر	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 411 لسنة 2000	694
33		33	منطقة استثمارية بناحية الوادي - مركز الصف	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 2485 لسنة 2010	40.48304
34		34	المنطقة الصناعية بمدينة 6 أكتوبر	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 504 لسنة 1979	7619
35		35	المنطقة الصناعية 6 أكتوبر الجديدة	هيئة المجتمعات العمرانية الجديدة		1804
36		36	الوحدات	وزارة الصناعة	قرار جمهوري رقم 358 لسنة 2008	272119

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الإجمالية (بالفدان) وفقاً للقرار
37	بورسعيد	797.43	جنوب بورسعيد (الرسوم) المساحة الإجمالية 797.43 فدان	المنطقة الصناعية الحوض السمكي	الانشاء : قرار رئيس مجلس الوزراء رقم 542 لسنة 1994	240
				المنطقة الصناعية بحري الحوض السمكي	الامتداد: قرار رئيس مجلس الوزراء رقم 350 لسنة 2004	212
				المنطقة الصناعية C7	الامتداد: قرار رئيس مجلس الوزراء رقم 478 لسنة 1997	18.8
				المنطقة الصناعية C9	الامتداد: قرار رئيس مجلس الوزراء رقم 900 لسنة 2002 قرار محافظ بورسعيد رقم 153 لسنة 2002	45.2
				المنطقة الصناعية C8	الامتداد: قرار رئيس مجلس الوزراء رقم 350 لسنة 2004	111
				المنطقة الصناعية قبلي C9	الامتداد: قرار رئيس مجلس الوزراء رقم 350 لسنة 2004	170
38			المنطقة الصناعية بورسعيد الجديدة (سلام)	هيئة المجتمعات العمرانية الجديدة		1289
39			المنطقة الحرة العامة ببورسعيد	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء لسنة 1975	191
40			المنطقة الصناعية بشرق بورسعيد (منطقة اقتصادية) (*)	الهيئة العامة للمنطقة الاقتصادية بمنطقة شمال غرب خليج السويس	قرار جمهوري رقم 330 لسنة 2015	23574
41		367.44	المجمع الصناعي المنطقة الصناعية	الهيئة العامة للتنمية الصناعية	الانشاء: قرار جمهوري رقم 91 لسنة 2009 التعديل: قرار جمهوري رقم 577 لسنة 2022	43.2
						324.24
42	شمال سيناء	5	المنطقة الصناعية ببنى العبد	محافظات	قرار رئيس مجلس الوزراء رقم 271 لسنة 1993	238
المنطقة الصناعية الحرفية بالمساعد			محافظات	الانشاء: قرار محافظ رقم 20 لسنة 1987 الامتداد: قرار محافظ رقم 232 لسنة 2010	367.8	
المنطقة الصناعية بوسط سيناء			محافظات	قرار رئيس الجمهورية رقم 70 لسنة 2017	78386.5	
45	جنوب سيناء	6	المنطقة الصناعية بابو زنيمة	محافظات	قرار جمهوري رقم 61 لسنة 2015	3908.93

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقا للقرار
7	الإسمايلية	46	المنطقة الصناعية بالقطرة شرق	محافظات	الإشباع: قرار رئيس مجلس الوزراء رقم 813 لسنة 1993 الإمتداد: قرار رئيس مجلس الوزراء رقم 2568 لسنة 1997	910
		47	المنطقة الأولى المنطقة الثانية	محافظات	قرار محافظ رقم 185 لسنة 1997	365
					قرار محافظ رقم 1272 لسنة 1981	262
		48	المنطقة الاقتصادية (منطقة اقتصادية) وادي التكنولوجيا	الهيئة العامة للمنطقة الاقتصادية بمنطقة شمال غرب خليج السويس	قرار جمهوري رقم 330 لسنة 2015	16500
		49		الهيئة العامة للمنطقة الاقتصادية بمنطقة شمال غرب خليج السويس	قرار جمهوري رقم 330 لسنة 2015	1838.6
		50		الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 904 لسنة 1995	775
8	الشرقية	51	منطقة بليس الصناعية (طريق بليس/العاشر ك 5)	محافظات	الإشباع: قرار رئيس مجلس الوزراء رقم 2110 لسنة 2000 الإمتداد: قرار رئيس مجلس الوزراء رقم 884 لسنة 2001 الإمتداد: قرار جمهوري رقم 173 لسنة 2017	289.6
		52	المنطقة الصناعية ببساتين الإسمايلية (الزوامل)	محافظات	قرار جمهوري رقم 494 لسنة 2017	1484.98
		53	المنطقة الصناعية بالصالحية الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 1237 لسنة 1982	623.28
		54	المنطقة الصناعية بالعاشر من رمضان	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 249 لسنة 1977	14055.43
9	السويس	55	المنطقة الحرة العامة بور توفيق	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 1688 لسنة 1993	21
		56	المنطقة الحرة العامة الأبيبة	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 1688 لسنة 1993	68
		57	المنطقة الحرة العامة عتاقة	الهيئة العامة للاستثمار والمناطق الحرة	قرار مجلس وزراء رقم 1962 لسنة 1995	214
		58	المنطقة الاقتصادية شمال غرب خليج السويس	الهيئة العامة للمنطقة الاقتصادية بمنطقة شمال غرب خليج السويس	الإشباع: قرار رئيس مجلس الوزراء رقم 3757 لسنة 1999 إمتداد: قرار رئيس مجلس الوزراء رقم 1775 لسنة 2000	48333
		59	شمال عتاقة	وزارة الصناعة	قرار جمهوري رقم 358 لسنة 2008	18896.5
		60	غرب عتاقة	وزارة الصناعة	قرار جمهوري رقم 358 لسنة 2008	31381.52
		61	المنطقة الصناعية بشمال خليج السويس	هيئة المجتمعات العمرانية الجديدة	1654	

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقا للقرار
10	دمياط	62	المنطقة الحرة العامة بدمياط	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 60 لسنة 1993	190
		63	المنطقة الصناعية بمدينة دمياط الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 546 لسنة 1980	558.01
11	كفر الشيخ	64	المنطقة الصناعية بباطيم	محافظات	قرار رئيس مجلس الوزراء رقم 1770 لسنة 1997	114
		65	المنطقة الصناعية ببطويس	محافظات	الإشعاء: قرار رئيس مجلس الوزراء رقم 1770 لسنة 1997 الإستعداد: قرار جمهوري رقم 165 لسنة 2009	1660
12	الدقهلية	66	المنطقة الصناعية جنوب غرب جمصة	محافظات	قرار رئيس مجلس الوزراء رقم 206 لسنة 1997	727.14
		67	المنطقة الصناعية بالصافرة (مجمع الصناعات الصغيرة)	محافظات	قرار رئيس مجلس الوزراء رقم 815 لسنة 1993	60
		68	المنطقة الصناعية الاستثمارية بعيت غمر	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 2616 لسنة 2009	17.7
13	المنوفية	69	كلور الزومل مركز قويسنا (منطقة حيازة الصناعية) بجبلي مساحة 410 فدان	المرحلة الاولى	الإشعاء: قرار رئيس مجلس الوزراء رقم 543 لسنة 1994	103
				المرحلة الثانية	الامتداد: قرار رئيس مجلس الوزراء رقم 3682 لسنة 1999	104
				المرحلة الثالثة	الامتداد: قرار رئيس مجلس الوزراء رقم 3682 لسنة 1999	100
				المرحلة الرابعة	الامتداد: قرار محافظ رقم 651 لسنة 2010 التعديل: قرار محافظ رقم 1004 لسنة 2014	103
		70	المنطقة الصناعية القديمة بقويسنا	محافظات	قرار محافظ رقم 264 لسنة 1978	225
		71	المنطقة الحرة العامة بشبين الكوم	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 1143 لسنة 2004	20
		72	المجمع الصناعي	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري 123 لسنة 1978	71.43
			المنطقة الصناعية	محافظات	قرار جمهوري 123 لسنة 1978	8991.6
14	البحيرة	73	المنطقة الصناعية بوادي النطرون	محافظات	قرار رئيس مجلس الوزراء رقم 2016 لسنة 1994	498.3
		74	المنطقة الصناعية بصحراء البوصلي (*)	محافظات	قرار رئيس مجلس الوزراء رقم 141 لسنة 1997	200
		75	المنطقة الصناعية	محافظات	قرار رئيس مجلس الوزراء رقم 2131 لسنة 2015	330.56
			المجمع الصناعي	محافظات	قرار رئيس مجلس الوزراء رقم 2131 لسنة 2015	15.44
		76	المنطقة الصناعية بالتوبارية - الاولى والثانية	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 375 لسنة 1986	146

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقاً للقرار	
15	الإسكندرية	77	المنطقة الصناعية بالمنشأة الجديدة	محافظات	قرار وزاري رقم 523 لسنة 1990 (باعتاد المخطط العام لسنة 2005) قرار وزاري رقم 336 لسنة 1998 (باعتاد المخطط العام لسنة 2017)	843.5	
		78	المنطقة الصناعية بمرغ قنبي وبجاري بمساحة اجمالية 4851 فدان	محافظات	المنطقة الصناعية بمرغ بحري	قرار وزاري رقم 523 لسنة 1990 (باعتاد المخطط العام لسنة 2005) قرار وزاري رقم 185 لسنة 1996 (باعتاد المخطط العام لسنة 2017)	2702
		79			المنطقة الصناعية بمرغ قنبي (مجمع مرغ 1 بمساحة 25 فدان مجمع مرغ 2 بمساحة 20.5 فدان)	قرار وزاري رقم 523 لسنة 1990 (باعتاد المخطط العام لسنة 2005)	2149
		80	المنطقة الصناعية كيلو 31 الطريق الصحراوي (منطقة السفن اب)	محافظات	قرار وزاري رقم 523 لسنة 1990 (باعتاد المخطط العام لسنة 2005)	814.3	
		81	سيكو (*)	محافظات	الإشعاء: قرار رئيس مجلس الوزراء رقم 240 لسنة 2002 التعديل: قرار رئيس مجلس الوزراء رقم 1360 لسنة 2002	160	
		82	العجمي قبلي بيطاش	محافظات	قرار رئيس مجلس الوزراء رقم 1828 لسنة 2002	2.98	
		83	المنطقة الصناعية بأم زعيو	محافظات	قرار محافظ رقم 906 لسنة 1997	2851	
		84	المنطقة الحرة العامة بالإسكندرية	الهيئة العامة للاستثمار والمناطق الحرة	قرار جمهوري رقم 2038 لسنة 1973	1357	
		85	المنطقة الصناعية ببرج العرب	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 506 لسنة 1979	3388.61	
16	مطروح	86	المنطقة الصناعية بجهة جنوب فوكة - مركز الضبعة	محافظات	قرار رئيس مجلس الوزراء رقم 1089 لسنة 2015	289.63	
		87	المنطقة الصناعية الكيلو 26 جنوب شرق طريق مطروح	هيئة المجتمعات العمرانية الجديدة	الإشعاء: قرار رئيس مجلس الوزراء رقم 463 لسنة 1993 التعديل: قرار جمهوري رقم 361 لسنة 2020	803	
		88	المنطقة الصناعية بالعنمين الجديدة	هيئة المجتمعات العمرانية الجديدة		6626	
17	الفيوم	89	المنطقة الصناعية بكموم اوشيم	محافظات	الإشعاء: قرار رئيس مجلس الوزراء رقم 2901 لسنة 1996 الإمتداد: قرار رئيس مجلس الوزراء رقم 2955 لسنة 1997 الإمتداد: قرار رئيس مجلس الوزراء رقم 928 لسنة 2015	1153	
		90	المنطقة الصناعية بفوته	محافظات	قرار رئيس مجلس الوزراء رقم 976 لسنة 1998	2000	
		91	المنطقة الصناعية بالفيوم الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 193 لسنة 2000	83.52	
		92	المنطقة الصناعية شمال الفيوم (كوم اوشيم)	الهيئة العامة للتنمية الصناعية	الإشعاء: قرار جمهوري رقم 17 لسنة 2010 التعديل: قرار جمهوري رقم 170 لسنة 2017	7872	

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقا للقرار
18	بنى سويف	93	المنطقة الصناعية ببياض العرب	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 207 لسنة 1997	750
		94	المنطقة الصناعية بكم أبو راضى	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 207 لسنة 1997 التعديل: قرار محافظ رقم 991 لسنة 2001	799.7
		95	المنطقة الصناعية 31/1	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 2091 لسنة 2000 التعديل: قرار جمهورى رقم 13 لسنة 2011	6428.57
		96	المنطقة الصناعية 31/2	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 2091 لسنة 2000 التعديل: قرار جمهورى رقم 13 لسنة 2011	3571.43
		97	المنطقة الصناعية 31/3	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 2091 لسنة 2000 التعديل: قرار جمهورى رقم 13 لسنة 2011	3116
		98	المنطقة الصناعية 31/4	محافظات	قرار رئيس مجلس الوزراء رقم 2091 لسنة 2000	2857.14
		99	المنطقة الاستثمارية بمركز سمسطا (*)	محافظات	قرار جمهورى رقم 111 لسنة 2022	147.14
		100	المنطقة الصناعية بمدينة بنى سويف الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 643 لسنة 1986	1043
		101	المنطقة الصناعية بالفطن الجديدة	هيئة المجتمعات العمرانية الجديدة	الانشاء : قرار جمهورى رقم 347 لسنة 2018 قرار وزارى رقم 80 لسنة 2020 (بايعتماد المخطط الاستراتيجى العام)	1875
		102	جبل غراب	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	161373.6
103	توسعات المنطقة الصناعية ببياض العرب بمساحة اجمالية 628 فدان	المجمع الصناعى	الهيئة العامة للتنمية الصناعية	قرار جمهورى رقم 99 لسنة 2017	70	
		المراحل الاخرى			558	
		توسعات المنطقة الصناعية بكم أبو راضى			60.26	
19	المنيا	105	المجمع الصناعى بالمنطقة الصناعية بالقطارة شرق النيل بمساحة 1908.3 فدان	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 323 لسنة 1994 الإستناد: قرار رئيس مجلس الوزراء رقم 2004 لسنة 2007	19.1 1889.2
		106	المنطقة الصناعية بالمنيا الجديد	هيئة المجتمعات العمرانية الجديدة	قرار رئيس مجلس الوزراء رقم 278 لسنة 1986	68.73
		107	المنطقة الصناعية بعلوي الجديدة	هيئة المجتمعات العمرانية الجديدة	الانشاء: قرار جمهورى رقم 347 لسنة 2018 قرار وزارى رقم 79 لسنة 2020 (بايعتماد المخطط الاستراتيجى العام)	65
		108	وادي سريره	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	22676.4

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقاً للقرار
20	أسسوط	109	المجمع الصناعي	محافظات	الإششاء: قرار رئيس مجلس الوزراء رقم 1406 لسنة 1994 الامتداد: قرار مجلس الوزراء رقم 4474 لسنة 1998	74
			المنطقة الصناعية			
		110	المرحلة الاولى	محافظات	الإششاء: قرار رئيس مجلس الوزراء رقم 1407 لسنة 1994 التعديل: قرار رئيس مجلس الوزراء رقم 409 لسنة 1995 الامتداد: قرار محافظ رقم 662 لسنة 2009 قرار مجلس الوزراء رقم 1624 لسنة 2015	35
			الامتداد			
		111		محافظات	قرار رئيس مجلس الوزراء رقم 1408 لسنة 1994	424
		112		محافظات	قرار رئيس مجلس الوزراء رقم 254 لسنة 1997	108.22
		113		محافظات	قرار رئيس مجلس الوزراء رقم 1354 لسنة 1998	39.23
		114		هيئة المجتمعات العمرانية الجديدة	قرار جمهورى رقم 194 لسنة 2000	471.75
		115		هيئة المجتمعات العمرانية الجديدة	قرار جمهورى رقم 78 لسنة 2017 قرار وزير الإسكان باعتماد المخطط الاستراتيجي رقم 1056 لسنة 2017	639
		116		وزارة الصناعة	قرار جمهورى رقم 86 لسنة 2013	261.32
21	الوادي الجديد	117	المنطقة الصناعية بالخارجة	محافظات	قرار رئيس مجلس الوزراء رقم 2069 لسنة 1996	181
		118	المنطقة الصناعية الداخلة بموط	محافظات	قرار رئيس مجلس الوزراء رقم 2069 لسنة 1996	71
		119	غرب وادي واعر	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	231157.6
22	البحر الاحمر	120	العلاقي (1)	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	61840.7
		121	العلاقي (2)	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	306749.7
		122	برنيس(1)	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	120485.2
		123	برنيس(2)	وزارة الصناعة	قرار جمهورى رقم 358 لسنة 2008	89615.8
		124	المنطقة الصناعية بطريق سفاجا - قنا	هيئة التنمية الصناعية	الإششاء: قرار محافظ رقم 820 لسنة 2017 التعديل: قرار محافظ رقم 1025 لسنة 2017	57.14

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقاً للقرار	
23	سوحاج	125	المنطقة الصناعية بحى الكوثر	محافظات	قرار رئيس مجلس الوزراء رقم 814 لسنة 1993	500	
		126	المنطقة الصناعية بالاحايوه - مركز اخميم	محافظات	قرار رئيس مجلس الوزراء رقم 251 لسنة 2000	250	
		127	بيت داود - غرب حمص بمساحة اجمالية 1086 فدان	المرحلة الاولى	محافظات	قرار رئيس مجلس الوزراء رقم 251 لسنة 2000	186
				مجمع صناعي			64.5
				مجزر الي للقوات المسلحة			21.5
				باقي المساحة			814
		128	المنطقة الصناعية غرب طهطا بمساحة اجمالية 912 فدان	المرحلة الاولى	محافظات	قرار رئيس مجلس الوزراء رقم 251 لسنة 2000	230
				المرحلة الثانية			170
				باقي المراحل			512
		129	المنطقة الصناعية بسوحاج الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهورى رقم 196 لسنة 2000	97.37	
		130	المنطقة الصناعية باخميم الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهورى رقم 195 لسنة 2000 التعديل: قرار جمهورى رقم 1623 لسنة 2015	203	
		131	المنطقة الصناعية الاستثمارية بالمطاهر	الشركة القومية للتشييد والتعمير	قرار جمهورى رقم 356 لسنة 2008	52278.6	
		132	المنطقة الصناعية بجهة غرب مدينتي طهطا وجبنة (القطعة الاولى)	الهيئة العامة للتنمية الصناعية	قرار جمهورى رقم 185 لسنة 2017	515.57	
133	المنطقة الصناعية بجهة غرب مدينتي طهطا وجبنة (القطعة الثانية)	الهيئة العامة للتنمية الصناعية	قرار جمهورى رقم 185 لسنة 2017	1010.29			
24	قنا	134	المنطقة الصناعية بالكلايين - مركز قفط	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 2017 لسنة 1994 التعديل: قرار رئيس مجلس الوزراء رقم 4308 لسنة 1998	354	
		135	المنطقة الصناعية بناحية هو مركز نجع حمادى بمساحة 777.44 فدان	محافظات	الإلتشاء: قرار رئيس مجلس الوزراء رقم 2018 لسنة 1994 التعديل: قرار رئيس مجلس الوزراء رقم 4309 لسنة 1998 الإستدراك: قرار جمهورى رقم 206 لسنة 2017	500	
						التوسعات	277.44
		136	المنطقة الحرة العامة بقفط	الهيئة العامة للاستثمار والمناطق الحرة	قرار رئيس مجلس الوزراء رقم 321 لسنة 2005	216	
		137	المنطقة الصناعية والحرفية بمدينة قنا الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهورى رقم 197 لسنة 2000	618	
		138	المنطقة الصناعية بمدينة غرب قنا	هيئة المجتمعات العمرانية الجديدة		130	
		139	المنطقة الاستثمارية بجبل الجير	الشركة القومية للتشييد والتعمير	قرار جمهورى رقم 356 لسنة 2008	60530	

رقم	المحافظة	رقم	اسم المنطقة	التبعية	جهة اصدار القرار	المساحة الاجمالية (بالفدان) وفقا للقرار
25	الاقصر	140	المنطقة الصناعية بالفيديا بمساحة 311 فدان	محافظات	قرار رئيس المجلس الاعلى للاقصر رقم 234 لسنة 2009 قرار جمهوري رقم 36 لسنة 2014 الامتداد: قرار رئيس مجلس الوزراء رقم 2122 لسنة 2015	49.17
						95
						145
						22.23
		141	مدينة طيبة الجديدة	هيئة المجتمعات العمرانية الجديدة	قرار جمهوري رقم 198 لسنة 2000	382.71
		142	المنطقة الصناعية بأرمنت	هيئة التنمية الصناعية	قرار جمهوري رقم 59 لسنة 2016	1011.73
26	اسوان	143	المنطقة الصناعية بالشالات طريق وادي العلاقي	محافظات	قرار رئيس مجلس الوزراء رقم 1409 لسنة 1994 الامتداد: قرار رقم 138 لسنة 2015	273
		144	المنطقة الصناعية بوادي هلال السباعية	محافظات	قرار جمهوري رقم 483 لسنة 2014	5115
		145	المنطقة الصناعية باسوان الجديدة	هيئة المجتمعات العمرانية الجديدة	الانشاء: قرار رئيس الجمهورية رقم 96 لسنة 1999	2384
		146	المنطقة الصناعية بمدينة توشكي الجديدة	هيئة المجتمعات العمرانية الجديدة	الانشاء: قرار جمهوري رقم 355 لسنة 2016	57
		147	المنطقة الصناعية / الحرفية بمركز نصر النوبة شرق الجنبنة (مجمع صناعي)	الهيئة العامة للتنمية الصناعية	قرار جمهوري رقم 208 لسنة 2017	56.5

ملحوظة :- المناطق الصناعية وموقفها بعد التنقيق بإدارة المساحة العسكرية وبالاتفاق مع جهات التبعية وجاري مراجعة المساحات والاحداثيات .



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