

An Egyptian emergency plan to confront climate change:

COP27 as an opportunity to change course

Position paper

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Introduction

The world is currently facing unprecedented dangers due to climate change. On the brink of catastrophe, we have only a very brief window in which to institute measures to stop global warming at 1.5°C above pre-industrial levels, which scientists have set as the threshold of danger for humanity. Unfortunately, this looks unlikely, as global temperatures have already reached 1.1°C over this baseline.¹

While all the world's countries are exposed to climate-related dangers, the risks are not equally distributed. Developing countries are more vulnerable than developed ones, the poor more vulnerable than the rich, and women and disadvantaged and marginalized social groups more vulnerable than others. Addressing the burdens of climate change, whether through mitigation or adaptation, must therefore be done in a framework of justice aimed at meeting the basic needs for a dignified life and protecting the human rights of all.

¹⁻ UN News, Climate: World Getting 'Measurably Closer' to 1.5-Degree Threshold, May 2022, https://news.un.org/en/story/2022/05/1117842#:~:text=There%20is%203%3A50,published%20on%20Tuesday%20in%20Geneva.

For reasons of natural geography, Egypt is extremely vulnerable to the risks of climate change,² and it lacks the resilience to meet these challenges for structural social reasons. Climate change will affect in particular the northern coast, food security, biodiversity, the adequacy of water and health, and all aspects of life,³ and the impact on vulnerable groups will be more severe.⁴ We believe the greatest focus of governmental environmental policy should be on addressing the risks of adapting to climate change.

Egypt contributes a mere 0.6 percent of global greenhouse gases (GHG) emissions⁵ and bears no historical responsibility for emissions. While we agree with the principle of common but differentiated responsibilities (CBDR), environmental and economic policy must pursue a careful balance that takes into account, in addition to the need to adapt to the consequences of climate

²⁻ https://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg2-chapter6-1.pdf.

³⁻ Egypt's First Updated Nationally Determined Contributions, June 2022, <u>https://unfccc.int/sites/default/files/NDC/2022-07/</u>Egypt%20Updated%20NDC.pdf.pdf.

⁴⁻ International Monetary Fund, Linking Climate and Inequality, 2021, https://www.imf.org/en/Publications/fandd/issues/2021/09/climate-change-and-inequality-guivarch-mejean-taconet.

⁵⁻ Our World in Data, Egypt CO2 Country Profile, 2020, https://ourworldindata.org/co2/country/egypt#what-share-of-globalco2-emissions-are-emitted-by-the-country.

change, the mitigation of GHG emissions in the framework of a just transition to a low-carbon economy that aims to achieve sustainable development and puts the rights of individuals, especially marginalized groups, to a dignified life at the forefront, while alleviating the burden of air pollution and health and ensuring good resource management.

Developed countries are historically responsible for the accumulation of GHG and possess the financial and technical resources to mitigate emissions. But many countries do not meet even their lax national contributions, and their total contributions are insufficient to stop warming at the 1.5°C threshold.⁶ We believe that developed countries should take stronger action, as well as assist developing countries that are vulnerable to climate change with financing and technology transfer.

At the same time, Egyptian government policy is still far from prioritizing the climate crisis as necessary to protect the economy and society and avoid greater social and environmental disparities, which are likely to worsen severely unless appropriate measures are taken as soon as possible. The government adopts a discourse that rightly focuses on the responsibility of devel-

⁶⁻ Climate Action Tracker, 2022, https://climateactiontracker.org/countries/.

oped countries and the importance of foreign climate finance. But practical policy still tends to pursue mitigation over other possible courses, which is the priority of developed countries, and focuses on procuring loans and attracting investments from major companies. This is coupled with a lack of clarity and transparency around the procedures and guarantees of fairness for the required transition, and the failure to anchor environmental issues in economic policy. Egypt's hosting of the 27th session of the Conference of the Parties (COP27) to the UN Framework Convention on Climate Change in November 2022 may be an opportunity to formulate an urgent operational contingency plan to deal with the crisis and change the course of government policy.

I. General outlines of the government's environmental policy: a critical review

1. The National Climate Change Strategy 2050⁷

A summary of the National Climate Change Strategy 2050 was released to decision makers in May 2022. To date, however, the strategy itself has not been published with full details or plans. The strategy summary outlined its vision for "effectively addressing the impacts and repercussions of climate change in a way that helps improve the quality of life of the Egyptian citizen, achieve sustainable development and sustainable economic growth, and preserve natural resources and ecosystems, while enhancing Egypt's international leadership in the field of climate change."

The strategy adopts five objectives to achieve this vision, of which two are pivotal: firstly, "achieving sustainable and low-emission economic growth in various sectors" and secondly, "building resilience and adaptability to climate change and its associated negative impacts." The other three

⁷⁻ National Climate Change Strategy 2050: Decision Makers Summary, May 2022, <u>https://www.eeaa.gov.eg/portals/0/eeaaRe-ports/N-CC/EgyptNSCC-2050-Summary-En.pdf</u>

objectives help to achieve the previous two: improving governance, improving infrastructure for climate finance, and promoting scientific research, technology transfer, and knowledge management. For each key objective, the strategy also set out sub-objectives, general orientations, and general and specific performance indicators. A complex institutional framework was developed as well for monitoring and evaluating the strategy.

This strategy is one of many national and sectoral strategies revolving around climate change and sustainable development in Egypt (for example, the Sustainable Development Strategy– Egypt Vision 2030, the Green Economy Strategy, the National Strategy for Disaster Risk Reduction, the Low-Emission Development Strategy, the Sustainable Agriculture Strategy, the Sustainable Energy Strategy, etc.).

Without the implementation of time-bound performance plans with regular follow-up and a clear roadmap to mainstream the environmental dimension and combat climate change in all sectors of the economy, and without the transparent dissemination of information, we fear that the strategy's objectives will remain mere proposals or a declaration of intent, much like previous strategies.

2. Updated Nationally Determined Contributions 2030⁸

Nationally determined contributions (NDCs) are a "climate action plan for reducing emissions and adapting to climate impacts. Each party to the Paris Agreement is required to establish and update NDCs every five years," in accordance with CBDR for addressing climate change.

Egypt submitted its first NDCs in 2015. The updated version was released in June 2022 and covers the period from 2015 to 2030. The year 2015 was used as the baseline against which the change in emissions is measured.

The contributions included quantified emission reduction rates in only three sectors: electricity, transport, and oil and gas; in all other sectors, the NDCs included non-quantified emission reduction activities. The quantitative emission reductions are measured in relative terms compared to "business as usual" (BAU) emissions rather than an absolute reduction over the baseline.

Egypt linked the achievement of NDC targets to the provision of donor financing. It also set the funding required for adaptation expenditures in both the national strategy and the NDCs at

⁸⁻ Egypt's First Updated Nationally Determined Contributions, June 2022, https://unfccc.int/sites/default/files/NDC/2022-07/ Egypt%20Updated%20NDC.pdf.pdf.

one-quarter to one-third of the funds required for mitigation, despite Egypt's high exposure to adaptation risks. This demonstrates the lack of targeted adaptation projects and the insufficiency of current efforts compared to the efforts required to address these serious risks.

II. A critical reading of strategic aspects, the NDC plan, and general recommendations

This section provides a critical reading of some aspects of Egypt's national strategy and the NDCs relevant to areas covered by our work at the Egyptian Initiative for Personal Rights. We also offer several recommendations to national and international actors; we believe these recommendations are within reach and will better help achieve climate justice.

1. Shifting to renewable energy in electricity generation

The government aims to generate 20 percent of electricity from renewables by 2022 and 42

percent by 2035. Although great strides have been made in recent years, the contribution of renewable energy to the electricity sector currently stands at only 11 percent, which means that the 2022 target has not been met and the 2035 target will be difficult to achieve.

The government has generally relied on major projects like the Benban solar park in Aswan to meet the target and on foreign funding to a large extent.

The NDCs project a 33-percent reduction in emissions in the electricity sector compared to BAU, but a comparison of total emissions in the sector to the baseline year of 2015 shows that emissions will increase by 40 percent.

Recommendations

• The government should announce the implementation of a long-term plan to generate at least 50 percent of electricity from renewable energy by 2030 (Egypt has the potential to achieve a 53-percent target by 2030, according to a study conducted by the International Renewable

Energy Agency with the Ministry of Electricity⁹); the plan should specify when and how to reach an absolute reduction in emissions over the baseline, and not only a relative reduction compared to BAU.

- Focus on small and medium enterprises more than megaprojects, increase incentives and accommodations for renewable energy generation in medium and small enterprises and households, and focus on providing financing mechanisms for small investors and homeowners, in order to accelerate the transition and achieve better social returns.
- Take advantage of the construction of new cities to prioritize renewable electricity generation by providing appropriate facilities and infrastructure and rapidly shifting to smart grids, as part of a general plan to improve the sustainability of these cities.

⁹⁻ International Renewable Energy Agency, Renewable Energy Outlook, 2018, https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2018/Oct/IRENA_Outlook_Egypt_2018_En.pdf.

2. Reducing the use of fossil fuels and coal

In general, the strategy is not geared toward phasing out fossil fuels, nor does it set a timetable or quantified targets to do so in order to attain carbon neutrality and absolute emissions reductions. Rather, the strategy envisions reducing fossil fuel emissions by improving energy efficiency and shifting to natural gas in some sectors, such as the conversion of cars to natural gas.

A. The cement industry and coal use

Cement is an energy-intensive and highly polluting industry. Emissions have increased due to the establishment of new plants and the conversion to coal power in 2015. Although the law states that alternative fuels (such as waste and sludge) should be included in the fuel mix used, coal still constitutes 90 percent of the energy used to power cement plants. The conversion to coal is expected to cause a 15-percent increase in carbon gases by 2030.¹⁰

Egypt signed an agreement to phase out the use of coal at the Glasgow conference last year, and the government has pledged not to use coal to generate electricity, which was already de facto

¹⁰⁻ Climate Action Tracker, 2022, https://climateactiontracker.org/countries/egypt/policies-action/.

the case¹¹ since electricity is not actually generated from coal in Egypt. Projects to construct coal plants conceived before Glasgow have been halted due to electricity surpluses and lower prices for renewable energy, among other factors.

Recommendations

- Stop building new cement factories. The plants are energy intensive and highly polluting, and for several years now Egypt has witnessed a significant increase in cement production that exceeds market needs.
- Immediately shift to the use of natural gas in plants close to residential communities, such as Alexandria's Titan Cement plant, pending the shift to a lower-emission, less polluting alternative.
- Announce a specific deadline for the elimination of coal use in the cement industry and a roadmap to achieve this objective. It should be noted that the phase-out of coal is included

¹¹⁻ Coal Is Getting the Boot as Egypt Signs Int'l Agreement at COP26 to Phase out Its Use, https://enterprise.press/afternoons/pm-coal-getting-boot-egypt-signs-intl-agreement-cop26-phase-use/#tldr-story-03.

under the first objective of the national strategy, and the NDCs also included the goal of increasing the use of alternative fuels. In addition, as mentioned above, Egypt is a signatory to the agreement to phase out coal.

B. Nuclear energy should not be a substitute for fossil fuels

The national strategy identified nuclear energy as a low-emissions alternative to fossil fuels.

The EIPR emphasizes that nuclear energy should not be considered an alternative. Its resources are not renewable, are extremely costly compared to other energy sources, and are a permanent source of hazard and threat, especially in light of poor human and physical infrastructure. The substantial cost to establish nuclear plants is also an impediment to a rapid transition to renewable energy, and alternative energy sources such as sun and wind are plentiful in Egypt.¹²

¹²⁻ EIPR, Without Guarantees: A Study on Nuclear Energy and El-Dabaa Project, 2019, https://eipr.org/en/publications/without-guarantees-el-dabaa-nuclear-energy-project.

C. Avoiding short-term solutions

In the transport sector, the NDCs project that national projects for the construction of thousands of kilometers of roads, dozens of major axes, and some 1,000 bridges and tunnels will reduce emissions by reducing riding time and gasoline consumption. This may be true in the short term, but in the long run, it will lead to an increase in the number of cars and renewed traffic congestion.¹³ Absent an increase in appropriate mass transit, roads are designed exclusively for private cars and heavy transport and do not take into account ease of mobility for people or non-motorized modes of transport such as bicycles and walking.

Although the national strategy provides for the preservation and expansion of green spaces, the expansion of the road network has altered the urban landscape in residential areas by the removal of huge numbers of trees, green spaces, and areas of historical value. Crossing streets and carrying out ordinary business is now riskier in, for example, the Heliopolis area and the Montazah gardens in Alexandria.

¹³⁻ ightline Institute, Widening Roads Leads to More Greenhouse Gas Emissions, 2007, https://www.sightline.org/research_item/climate-analysis-gge-new-lanes-10-07/.

The NDCs put the cost of high-speed trains (three lines)—to be used by relatively few Egyptians with high usage fees—at \$27.2 billion. Meanwhile, the cost of all other mass transit projects, including the expansion of the metro and the development of light trains and express buses, is about half of this amount (\$13 billion), although these modes of transport serve large numbers of individuals.

The transport industry is seeing a significant increase in emissions, as recorded in the NDC report. Although carbon emissions are down by about 7 percent from the BAU scenario, they are up by about 60 percent compared to the 2015 baseline.

Recommendations

• In the development of road and transportation infrastructure, the government should adopt a policy that is mindful of the urban landscape, especially in existing cities, and prioritizes the convenience of individuals and residents, with a focus on mass transit and accessibility for non-motorized transport such as bicycles and pedestrians. The government should announce these policies, allow environmental impact assessment studies for infrastructure projects, and allow for broad community participation in planning and implementation.

• Trees and green spaces reduce pollution and temperatures and function as carbon sinks. Cutting down trees, especially old-growth trees, and the elimination of green areas must be avoided, and plans should be made to increase green spaces in old cities, not just in new cities and gated compounds. An Egyptian government handbook released in 2010¹⁴ estimated the per capita green space in Egypt at no more than 1.5 m2. More recent official numbers put the average at 1 m2 in 2020.¹⁵ In 2022, the biggest per capita average of green space was in the governorate of South Sinai, at 1.61 m2, while the average in the urban governorates of Cairo, Alexandria, Suez, and Port Said came in at 39 cm2. In contrast, Londoners enjoy 27 m2 of green space per capita, while the residents of Istanbul and Vienna enjoy 6.4 m2 and 120 m2 respectively.¹⁶

¹⁴⁻ Urban Harmony Foundations and Standards for Open Areas and Green Spaces (Arabic), <u>http://www.urbanharmony.org/</u>guide/mosthat%20khdraa.pdf.

¹⁵⁻ Youm7, 1 Square Meter: Every Egyptian's Share of Green Space (Arabic), February 2020, https://www.youm7.com/story/2020/2/1/%D9%85%D8%AA%D8%B1-%C3%97-%D9%85%D8%AA%D8%B1-%D9%86%D8%B5%D9%8A%D8%A8-%D9%83%D9%84-%D9%85%D8%B5%D8%B1%D9%89-%D9%85%D9%86-%D8%A7%D9%84%D9%84%D9%85%D8%A3%D8%AA7%D8%AA-%D8%AA7 %D9%84%D8%AE%D8%B6%D8%B1%D9%847%D8%A1-%D8%A7%D9%84%D8%A6%D8%A6%D8%A6%D8%A9/4611832.

¹⁶⁻ Baharash Architecture, Livable Cities: How Much Green Space Does Your City Have? 2015, <u>https://www.baharash.com/</u> liveable-cities-how-much-green-space-does-your-city-have/.

D. Who is green and blue hydrogen for?

Egypt's national strategy includes the implementation of several green and blue hydrogen projects as part of plans to reduce emissions in the energy sector. Blue hydrogen is cheaper than green given the ease of technology, but it relies on fossil fuels (such as gas) to produce, while green hydrogen production relies on renewable energy.¹⁷

There is great enthusiasm for hydrogen production and export projects, accompanied by inflows of foreign investment and driven by rising demand in the West due to the energy crisis engendered by the Russian-Ukrainian war. In the case of both blue and green hydrogen, Egypt will not use the new types of hydrogen generated because it will not have the necessary technology; rather, it will provide the primary resources and bear the burden of pollution. The renewable energy consumed will not serve to speed the electricity transition in Egypt, but will instead be directed to the manufacture of green hydrogen.

¹⁷⁻ CNBC, Hydrogen Power Is Gaining Momentum, But Critics Say It's Neither Efficient Nor Green Enough, 2022, https:// www.cnbc.com/2022/01/06/what-is-green-hydrogen-vs-blue-hydrogen-and-why-it-matters.html#:~:text=Green%20hydrogen%20is%20when%20the,like%20wind%2C%20water%20or%20solar.&text=Blue%20hydrogen%20is%20hydrogen%20 produced,hot%20steam%20and%20a%20catalyst.

Recommendations

• The selection of mitigation projects in general, including hydrogen production projects, should take into account the balance between climate financing opportunities and the returns accrued to the country in terms of the optimal use of resources, capacity development, and environmental protection, in a way that achieves an equitable transition toward a low-carbon economy in Egypt.

E. Global pressure to increase natural gas production and the reversion to diesel in electricity generation

As natural gas prices rise in the wake of the Russian-Ukrainian war and increased global demand, there is pressure on Egypt to increase its gas exports, part of similar pressure on many African states to become alternative suppliers of gas. Although natural gas is better than coal and petroleum, it is nevertheless a fossil fuel that exacerbates climate change and air pollution, and there are already popular movements in Africa resisting this pressure.¹⁸

¹⁸⁻ Don't Gas Africa, https://dont-gas-africa.org/.

While gas-producing countries shoulder the blame for increasing fossil fuel production, most of them are developing countries that are depleting their resources for the benefit of developed nations, which are more responsible for maintaining the status quo by providing investments for the extraction of fossil fuels and due to their demand for them.

In Egypt, greater global demand for gas coupled with the government's need for hard currency have served to boost gas exports, compensated for by the reduction of domestic consumption, including the consumption of natural gas in electricity generation. Some electric plants have already been converted to highly polluting diesel instead of natural gas in order to allow for increased gas exports.¹⁹

 ¹⁹⁻ Shorouk, \$450 Million a Month: Details of the Electricity Plan to Rationalize Energy Consumption (Arabic), August 2022, https://www.shorouknews.com/mobile/news/view.aspx?cdate=11082022&id=ec238b2c-a064-42f9-9a02-75ef-66040f3a#:~:text=%D9%88%D9%83%D8%B4%D9%81%20%D9%85%D8%AF%D8%AF%D8%B1%20

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3. Reducing air pollution

Reducing fossil fuel usage not only reduces GHG, but also air pollution, a vital issue in Egypt, which suffers from high rates of air pollution and a large health burden, especially in major cities. For example, air pollution resulted in 67,000 premature deaths in 2016 and a loss of some 3.5 percent of GDP in 2013.²⁰

Recommendations

- Lower the permissible legal levels of fine particulates, the main cause of air pollution; in Egyptian laws, these are currently ten times higher than the standards set by the World Health Organization.
- Bring the emission standards for environmentally polluting plants into compliance with global standards.

²⁰⁻ EIPR, Air Pollution: A Growing Health Burden for Egyptians (Arabic), 2020, https://eipr.org/sites/default/files/reports/pdf/eipr-air_pollution2020.pdf.

- Reduce the percentage of sulfur in diesel fuel to comply with international standards. Locally produced diesel fuel has more than 5,000 parts per million of sulfur, more than 500 times the concentration of sulfur allowed in the European Union, which sets a standard of just 10 parts per million. Egypt is among the 13 countries with the highest concentration of sulfur in diesel fuel in the world.²¹
- Improve air-quality monitoring and acc to relevant information.

4. Solid waste and plastics

Recommendations

• Quickly implement and provide financing for projects addressing the problem of solid waste, in order to mitigate emissions from waste, combat environmental pollution and disease, and provide an alternative fuel source in the cement and other industries.

²¹⁻ EIPR, Diesel Without Sulfur for Cleaner Air and Better Health (Arabic), 2021, https://eipr.org/search?keywords=%D8%B3 %D9%88%D9%84%D8%A7%D8%B1+%D8%A8%D8%AF%D9%88%D9%86+%D9%83%D8%A8%D8%B1%D9%8A%D8%AA.

• Oxo-degradable plastics are not considered an environmentally safe alternative. Egypt's NDCs noted that \$600 million has been allocated for the production of biodegradable plastics, including oxo-degradable plastic. Much research has shown that this type of plastic is not sufficiently biodegradable and cannot be incinerated²²; it is hazardous to recycle and is not considered biodegradable by the EU. Its production in Egypt should not be encouraged, especially given the weakness of the waste management system and the lack of waste separation at the source.²³

²²⁻ High temperatures are used to burn waste into ash. The first task of incineration is to eliminate organic compounds that are difficult to dispose of. The resulting ash falls to the bottom of the place where the incineration is done, typically a huge chimney. The gases released during the incineration process are used to generate electricity while the air associated with the process is purified to eliminate all hazards.

²³⁻ EIPR, FAQ on Oxo-Degradable Plastic (Arabic), 2020, https://eipr.org/publications/%D8%A3%D8%B3%D8%A6%D9%84% D8%A9-%D9%88%D8%A3%D8%AC%D9%88%D8%A8%D8%A9-%D8%AD%D9%88%D9%84-%D8%A7%D9%84%D8%A8%D 9%84%D8%A7%D8%B3%D8%AA%D9%8A%D9%83-%D8%A7%D9%84%D9%82%D8%A7%D8%A8%D9%84-%D9%84%D9% 84%D8%AA%D8%AD%D9%84%D9%84-%D8%A8%D8%A7%D9%84%D8%A3%D9%83%D8%B3%D8%AF%D8%A9.

5. Climate risk adaptation (food, water, health)

Climate change adaptation efforts are by no means commensurate with the difficulties Egypt faces, which were summarized in the national strategy and the NDCs. Egypt is one of three global hotspots because of the Nile River's vast delta, which is vulnerable to flooding and salinization and could see a loss of about one-third of its food production by 2030. This is in addition to water shortages, extreme climate waves, disease, drought, and the projected losses of natural and physical resources. In contrast, adaptation activities and efforts are sporadic, limited, and general.

Recommendations

• The impacts of climate change, especially on agriculture, food, and water, and coupled with high rates of poverty and illiteracy, are putting serious pressures on the economy, population, and stability. We believe climate change should be considered an imminent threat to the country's safety. There is thus a need to develop a comprehensive national response plan that incorporates all sectors and is commensurate with the threats posed by climate change, which may reach catastrophic levels in a few short years, and to start mobilizing energies to implement the response plan.

- Improve water quality, especially given expected water scarcity; immediately prohibit the discharge of industrial waste into the Nile; and repeal any exceptions that the law allows the administrative authorities to grant.
- The health sector in Egypt suffers from a lack of material and human resources. The Covid pandemic has demonstrated the urgent need to strengthen this sector,²⁴ in order to cope with the increasing disease burdens that climate change will bring. Although there have been some efforts in this regard, they are still inadequate and need to be strengthened.²⁵ This is in addition to mainstreaming the response to climate change in the health sector and improving the sector's infrastructure and human resources.

²⁴⁻ EIPR, Beyond Covid-19: The Plight of Egyptian Doctors, 2021, https://eipr.org/sites/default/files/reports/pdf/beyond_covid-19.pdf.

²⁵⁻ EIPR, Why Does Climate Change Threaten Our Health and How Has Egypt Prepared for It (Arabic), 2022, https://bit. ly/3Q1tLO4.

6. Climate finance

Climate finance available to developing countries for mitigation and adaptation is far less than the \$100 billion annually pledged by developed countries. Although even this amount falls far short of the actual needs of developing countries, the sums actually provided are paltry. Moreover, less funding is available for adaptation than for mitigation, which is contrary to the priorities of developing countries.

Egypt has received low levels of climate finance, and most of it in the form of soft loans rather than grants.

Recommendations

- Seek to increase funds for climate finance for developing countries; facilitate mechanisms for obtaining it, which are currently overly complex and difficult; and increase financing in grants rather than loans, bonds, and similar financing instruments.
- Seek to increase funding for adaptation. The international private sector and banks prefer to

invest in mitigation because green energy projects generate profit; they do not contribute to adaptation projects, which are mostly borne by the state.

- Seek debt cancellation for countries vulnerable to climate change. Debt cancellation can be linked to the channeling of funds to adaptation projects.
- Prioritize climate change adaptation in public spending in the budget; consider increasing budget revenues from taxes on polluters and prioritize spending to mainstream environmental issues in government policy, especially in infrastructure projects, urban policy, and other areas.

7. Cross-sectoral recommendations

- Improve governance in all economic sectors, particularly in the environment sector.
- Provide and make available information and protect the right to effective participation and freedom of expression and association.

- Pay special attention to marginalized and vulnerable groups, and women's empowerment.
- Raise the capacity of the Ministry of Environment and strengthen it politically, and mainstream the perspective of environmental and social sustainability.
- Improve environmental legislation and monitor the application and enforcement of laws.