

THE PUBLIC POLICY HUB

Peddlers in Means of Public Transportation in Egypt: A Discussion of Policy Options

A Policy Paper



Prepared by*

Dina Ahmed Ali
Shatha El Sherif
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Under the supervision of:
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June 2021

Names are listed in alphabetical order

Published by:

**The Public Policy HUB
The School of Global Affairs and Public Policy (GAPP)
The American University in Cairo (AUC)**

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Abbreviations

CAPMAS	Central Agency for Public Mobilization and Statistics
ECMMO	Egyptian Company for Metro Management and Operation
FEDA	Federation of Economic Development Associations
GPS	Global Positioning System
ILO	International Labor Organization
INGOs	International Non-governmental Organizations
MCIT	Ministry of Communication and Information Technology
MENA	Middle East and North Africa
MOF	Ministry of Finance
MoSS	Ministry of Social Solidarity
MSMEDA	Micro, Small and Medium Enterprises Development Agency
NGOs	National Non-Governmental Organizations
OECD	Organization for Economic Co-operation and Development
QR Code	Quick Response Code
SDGs	Sustainable Development Strategy
UNESCO	United Nations Educational, Scientific and Cultural Organization

Table 1: Workplan for the Proposed Policy Implementation

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Executive Summary

The policy paper is tackling the issue of the informal transportation peddlers, namely at the Metro (subway) and railway stations. The authors deal with this kind of informal peddlers as an occupational segment of society that contributes to the national economy rather than groups of people who are distorting the civilized image of the transportation system in Egypt.

In this context, the policy options that are mentioned in this paper are targeting to have a positive impact on reducing the unemployment rate, increasing the size of the formal economy, and guaranteeing the state's right of taxation. As for the multidimensionality of informality, it is important to recognize that not a sole policy can contribute to solving this issue. Rather, a set of policy interventions are recommended to be implemented in an effective way to build the trust between the government and the informal peddlers and pave the way to regulate this kind of economy in an innovative way as part of implementing the vision of the "Sustainable Development Strategy (SDS) Egypt Vision 2030" to reach an inclusive, sustainable and balanced society.

Peddling at the means of transport in Egypt is a complex issue that needs a deep observation of the current policies and the suggestion of innovative solutions that are suitable to all contradicting stakeholders. In this regard, the policy options that are mentioned in this paper are taking into consideration that any kind of enforcement in implementing the interventions will lead to failure and therefore a negative impact on the economic growth and employment rates. The interventions are recommended to be integrated into a flexible regulatory framework and the perfect usage of the available resources.

The policy paper has suggested three policy options to handle the issue of the peddling in Metro and railway stations. The paper sets seven criteria to assess the policy options in-

cluding technology, financial, political acceptance, technical feasibility, equity, effectiveness, and efficiency.

The policy option, that is selected, is targeting to implement an innovated solution depending on the decision rule of the technological criteria. Therefore, the paper is recommending the implementation of the policy of using the communication technologies (ICTs) tools in arranging the informal peddlers in the means of transportation.

At the end, the paper provided four recommendations that are essential to support the successful implementation of the policy that include: conducting a situation analysis, dealing with the informal peddlers as potential entrepreneurs who need an exceptional kind of treatment to strengthen their businesses, the creation of a peddlers' union, and conducting regular questionnaires to gain the insights of the passengers/ customers.

Methodology

The policy paper methodology depended primarily on the desk review of the official reports, content analysis of the official interviews with the governmental officials and the representative of the informal peddlers and conducting in-depth interviews.

The authors of the policy paper were able to meet Mr. Ahmed Abdel-Hady, Director of the Public Relations Office of the Egyptian Company for Metro Management and Operation and the official speaker of the company on the 6th of December 2020.

Intended Audiences

The primary audiences of the policy paper are the Transport Planning Entity, the Egyptian Company for Metro Management and Operation, Egyptian National Railways, Transport Police officers, the Ministry of Social Solidarity (MoSS), the Ministry of Communication and Information Technology (MCIT), the Micro, Small and Medium Enterprises Development Agency (MSMEDA), and the informal peddlers in the means of transportation.

The secondary audiences of the policy paper are the private sector, National Non-governmental Organizations (NGOs), International Non-governmental Organizations (INGOs), and the public/ customers (passengers).

Introduction

The International Labor Organization (ILO) defines informal work as “all economic activities that are – in law or in practice – not covered or sufficiently covered by formal arrangements”, therefore, informal work is a dynamic producer of job opportunities and income for a large segment in Egypt. Informal work is divided into two main types including street vendors who are selling in the street and public spaces on the ground and the informal peddlers who are selling their products underground at Metro and railway stations (Peña, 2000). The policy paper’s concern is the peddlers who are at the means of transport including the Metro and railway stations, and under the jurisdiction of the Transport Planning Entity and the related authorities including the Metro and railway stations and the transport police.

This is opposed to the street vendors that are located on the ground and outside the Metro and railway stations and are managed by the local authorities and under the jurisdiction of the governor (Elhelal Elyoum, 2018), and these are not included in the paper’s scope. In Egypt, the authorities recognize the right of space to the activities that are contributing to the national economy and are registered and enrolled in the taxation system. For the unregistered activities, the authorities deal with them as dirty activities that annoy the citizens and distort the civilized image of the means of transportation. Consequently, the authorities either evict the informal peddlers or move them to another place under the policy application of the urban order. As a result, the peddlers play “hide and seek” with the police and move from one place to another (Natawidjaja, Rahayu, and Sutrisno, 2015).

The number of informal peddlers has increased significantly even though many security campaigns are conducted to control it. This is due to the consecutive deterioration of living standard during the last years is the key reason, arising from political tur-

moil, the devaluation of the Egyptian Pound, the reduction of the subsidies on goods and services, the increase of the fuel and energy prices, the increase of the poverty rate to 32.5% during the period 2017/2018, and the fluctuation of the unemployment rate (Saif Eldien, 2019; World Bank). Furthermore, other studies indicate that the main reason for augmenting peddlers’ proportion is the absence of the state’s role in providing job opportunities that has driven youth to create their self-employment businesses, especially between the university graduates of the middle-class, who have become part of this informal peddling in Metro and railway stations (Sharqawi, 2014; FEDA, 2009).

This policy paper deals with the peddlers at the Metro and railway stations as a vital role in the society through providing essential commodities to the low and middle class with affordable prices and quality (Saha, 2011), and present kind of employment that is often labor-intensive, small-scale and low-tech. Hence, the policy option that the paper selected aims to take this advantage of the informal economy to increase the technology element, in a world that is strengthening the usage of the technology (Winter, 2017).

Background

The Metro and railways are among the main means of transport in the Greater Cairo. Most of the working-class citizens use the Metro and trains as the main means of transport to reach their workplace and homes. The Metro carries almost 4 million passengers daily while 1.4 million passengers take railways per day (Saif Eldien, 2019).

As for the peddlers, they are defined as an informal vendor of commodities that can be carried easily. Usually, a peddler sells cheap items, and frequently advertises them by loud chants or cries and sometimes banter with customers to draw attention and enhance sales. Many peddlers earn their daily livelihood from the passengers of the Metro and rails; therefore, seeing them selling several things inside trains is very casual and ordinary (Saibabu & Chakravarthi, 2018).

However, Law No. 33 of 1957 stipulates that peddlers must obtain licenses to practice their work, and Article 9 of the law prohibits sellers from displaying their goods or practicing their trades in the means of transportation, so the selling activity inside the Metro and train cars has become illegal. Nevertheless, the Metro and railways authorities have not succeeded to stop this phenomenon, as the peddlers can access the stations through other illegal methods (Saibabu & Chakravarthi, 2018).

Recently, the Egyptian Company for Metro Management and Operation decided to raise

the fine of selling inside the Metro to 100 Egyptian Pounds, following the increase of the price of the passenger ticket in May 2018, and it intensified releasing campaigns in cooperation with the Transport Police to control the peddlers through confiscating their goods. Despite the inconvenience that the passengers may feel due to the movement of peddlers in the crowded Metro and trains, or the loudness of their voices to draw the attention, the sellers' quest to sell their goods remains an attempt to overcome the deterioration of their living standards and the few channels of other livelihoods at a time when there are no alternatives provided by the government (Saibabu & Chakravarthi, 2018).

It is likely to define the peddler's problem in the Metro and railway stations in three aspects: their occupation of the public spaces, which affects the passengers' rights and the urban manifestation, the social and economic aspects as they are significant parts of the state's informal economy, the peddlers' right to work, and having legal legislation to protect them. Thus, the challenge that lies in the peddlers' problem is how to find solutions that take into account the social and economic aspects and are far from the security solution that has long been pursued by the successive governments that did not result in providing effective solutions, but rather exacerbated the problem (Sharqawi, 2014).



Credit: Hadeer Mahmoud / Mada Misr (2019)

Background

“Often people fail to realize the extent of economically efficient production in the informal sector because of the low incomes received by most workers in the sector. A common interpretation of the cause of these low incomes (in comparison to average wage levels in the informal sector) has been to presume that the problem lies within the informal sector; that it is stagnant, non-dynamic, and a net for the unemployed and for the thinly veiled idleness into which those who cannot find formal wage jobs must fall. It is hardly surprising that this view should be widespread, for academic analysts have often encouraged and fostered such an interpretation.” (ILO, 2000)

Problem Statement

The Metro and railways are among the main means of transport in the Greater Cairo. Most of the working-class citizens use the Metro and trains as the main means of transport to reach their workplace and homes. The Metro carries almost 4 million passengers daily while 1.4 million passengers take railways per day (Saif Eldien, 2019).

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Background

According to Mr. Ahmed Abdel-Hady, Director of the Public Relations Office of the Egyptian Company for Metro Management and Operation and the official spokesman of the company, “the peddlers in the underground prefer to pay a fine of 50 Egyptian Pounds or 100 Egyptian Pounds when they get caught instead of renting a legal space in the underground Metro”. Mr. Abdel-Hady also mentioned that “Peddlers are trying to gain empathy once they are caught up by the police officers to free them”. In this context, the informal peddlers’ problem is characterized by:

(1) Insignificant solutions to the problem: the current policy that includes moving the peddlers to another commercial markets has not always been met with the peddlers’ acceptance. According to the peddlers, the new markets’ locations are not connected to the main roads and are far from attracting the customers (American Chamber of Commerce in Egypt, 2014),

(2) Informality of the peddlers caused mainly by the high rate of unemployment in Egypt. The latter is caused by the limited jobs offered by businesses and the complex process of starting a new business. As the informal peddlers have already created their new businesses by themselves, and once they have been formalized, they will be turned into a formal business,

(3) Insecurity element, eviction and relocation (El – Hamidi, 2020). The authors identified the informal peddlers’ problem in Egypt into three angles:

- A. Citizens, the right of space: The peddlers’ occupation of the public spaces, which affects the right of other citizens to the space.
- B. State, the economic right: The economic implications of informal peddlers as being a significant part of the state’s informal economy.

- C. Informal peddlers, the right to work: The right to work and the importance of having legal legislation that protects their rights in a way that will not affect the rights of others.

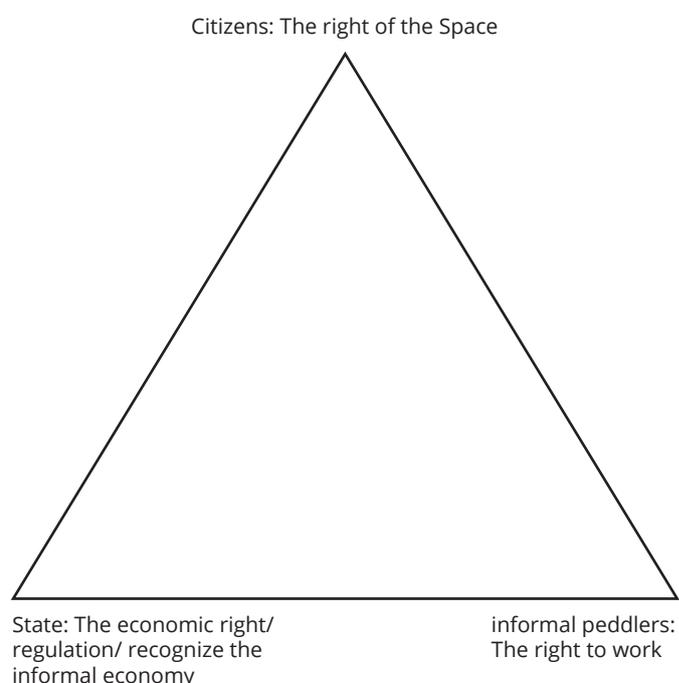


Figure 1: The Triangle of the Transportation Peddlers Problem in Egypt.

Also, there are no published sources that provide an accurate number of the informal peddlers at the Metro and railways stations and their contribution to the economy, as collecting data for the informal peddlers at the means of transportation is modelling a challenge due to the distribution and mobility of these peddlers.

Accordingly, the policy paper is seeking to provide a recommended policy intervention that guarantees a job for the informal transportation peddlers which preserves the three mentioned rights and provide productive and decent jobs that are identified by the four pillars identified by the ILO guidelines, which include employment, social security, fundamental rights, and social dialogue (ILO, 2002).

Countries' Experiences in Dealing with the Informal Peddlers Problem

◇ The Indian Experience

• Indian Railways

1. In March 2016, the Indian railways authority has called officially for legal solutions for peddlers operating in the railways and welcomed any solutions via email, as they have received lots of complaints from the passengers who claimed that the peddlers sell prohibited items such as drugs and tobacco.

2. The Indian Ministry of Railways planned to develop a peddlers' policy that aims at banning unauthorized peddlers in the railway stations through the following procedures (The Hindu, 2016):

- * Count the number of the peddlers, issue licenses and conduct trainings to them on how to sell their products in the designated stalls and adhere to the hygiene protocols.
- * Wear an official uniform, with a name tag that clarifies the name and the license number.
- * The Railway Authority announced some rules that included banning the selling of illegal items, prohibiting any unauthorized peddlers to sell at the stations, and adopting a certain hygiene protocol for the food products.

3. The railway authorities in Mumbai decided that all the train stations will be peddler-free at least 50 meters from the carriages, due to the citizens' stampede which led to the death of 23 people (India Today, 2017).

4. In July 2019, the railways authorities in Mumbai provided a 150 meter in the stations as peddlers' free zone and 180 stalls at 11 stations. There is a plan to increase the number of the stalls in the future (Central Railway, 2019).

• Indian Metro

1. In 2017, the peddlers' union of Andheri suggested the establishment of an underground peddling zone and agreed to cover the infrastructure cost. The peddlers were inspired by Delhi's Palika bazaar, which is an underground market.

2. Then, Brihanmumbai municipal announced that the new stations will provide zones for the peddlers (Hindustan times, 2017).

◇ Accra Tema, Ghana

- The railway station is connected with two markets namely, Kantamanto and Makola. The Railway Minister declared that the objective of the two markets inauguration is to prevent peddlers from roaming inside the stations. Also, the Minister issued a directive indicating that the Accra Metropolitan Station is responsible for tracking the peddlers' work in the markets.

◇ Seoul, South Korea

- The Metro has 22 lines and 728 stations in Seoul. In 2019, almost 2.7 billion passengers used the Metro (The Korea Herald, 2020).
- Adopted policies:
 - * Establishing Seoul's underground shopping mall, where hundreds of stores are available to serve the Metro passengers in several stations (e.g., Ganganm station- Express bus terminal - Yeoungdeungpo - Jamsil - Jonggak); therefore, the phenomenon of peddlers has been disappeared.

Countries' Experiences in Dealing with the Informal Peddlers Problem

- * Providing outlets around the Metro stations, including Dongmyo Flea Market and Garak market that are the biggest markets in South Korea. The market provides fixed stalls for the peddlers that are very near to the Metro stations.



Reference: JHL, April 2020



Reference: Korea Bizwire, Jul. 2019

The Legal Framework of the Informal Peddlers in Egypt

The first governing law for the informal peddlers is Law no. 73 of 1943, followed with an amendment no. 19 of 1951. Recently, the governing law no. 33 of 1957 is tracked with an amendment with law 105 of 2012. This shows that the law has not changed for more than sixty years which needs to be revised in the context of the new social and economic development in Egypt.

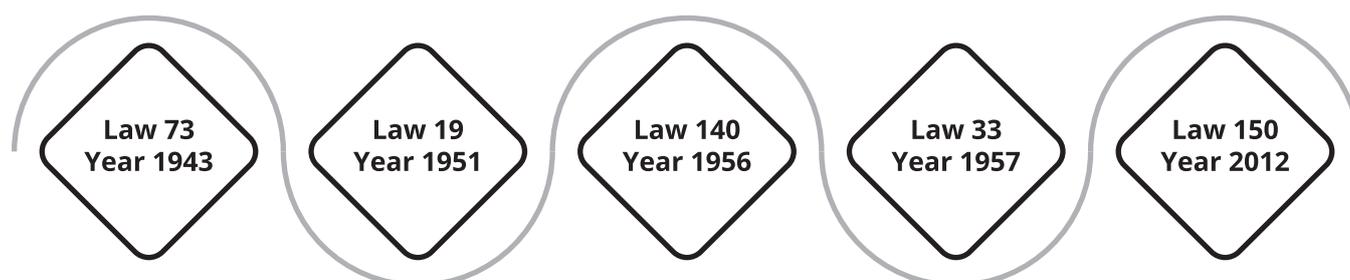


Figure 2: The Development of the Informal Peddlers Laws

- **Law no. 73 of 1943** stated that it is not permissible for peddlers to practice a trade before obtaining a license.
- **Law no. 19 of 1951** amended the provisions of Law 73 that the street vendor should not suffer from infectious diseases.
- **Law no. 140 of 1956** has divided the places based on their significance, requested a license, and determined certain places for selling by the authorities.
 - * As clarified in article 4 b:»As an exception to the provisions of this law, local administration units or city councils in the new Urban Communities Authority may, as the case, issue temporary renewable one-year permits for public roads, in accordance with the general and special requirements of laws and decisions governing the operation and management of shops” (El-Azzazy, 2019).
- **Law no. 33 of 1957** criminalized peddling: “peddlers who trade without a license and prohibit[ed] vendors from selling on public transport, standing next to shops selling similar goods or in places identified by the police as needed for traffic or public security, or causing a disturbance” (Kafafy 2017)
- Subsequently, **Law 105/2012** has passed and augmented the existing punitive measures. Albeit according to the previous Law No. 33/1957, the sentence of illegal vending was one-month custody and 1000 EGP fine, whereas the new statute imposes up to a 3-month imprisonment penalty and 3000 EGP fine (Abdelrahman 2013).

Main Egyptian Governmental Current Policies towards the Informal Peddlers

1. As stated by Mr. Ahmed Abdel-Hady, the Director of the Public Relations Office of the Egyptian Company for Metro Management and Operation and the official speaker of the company, one of the Metro stations policies is to conduct awareness campaigns through the announcements in the internal radio in the stations regarding not to buy from the peddlers.
2. Security ongoing campaign to evict the Metro and railways stations of peddlers, this policy is performed to maintain order in the area, provide the right of the space to the citizens, and keep the civilized image of the square.
3. Continuous massive security campaigns that are aimed at removing the occupancies and arresting the peddlers at the entrances and exits of the Metro stations and inside the Metro cars (Hemida, 2019).

Consequences of the Current Governmental Policies

The past and ongoing state policies towards the informal peddlers did not result in resolving the problem. The way of dealing with this segment of the society and picturing them as chaotic and criminals, is leading them to commit more violations and with no sense of containment by the government. Also, this wastes a huge contribution for the country to the national economy and increases the unemployment rate. It is also important to consider that what makes this kind of work successful is its flexibility and physical mobility. These policies are recommended to be changed as it is not possible to prevent any passengers from entering the Metro/ railways stations with a bag carrying their belongings. A new innovative policy should be adopted by the government to maintain the 3 mentioned rights.

Mapping the Key Stakeholders

1. High power – High interest: they are the key players, as they are the only ones to have the power to agree on the policy implementation, and without their approval the policy will not be implemented.
2. High Power – low interest: they are the stakeholders where their participation in the implementation is high with maximum efforts, as if they did not engage in the implementation, the policy success may not be achieved, for example, if the MoSS did not cooperate with the MoF to allocate funds for the social insurance coverage, the peddlers will not be satisfied and then they will resist the policy implementation.
3. Low power – high interest: They are the ones who should be kept satisfied with the selected policy as they are the beneficiaries.
4. Low power – Low interest: They are the ones who should be kept informed with minimal efforts, as their participation is an asset to the policy implementation, but they are not essential as other inputs can support the implementation from the mentioned stakeholders.



Policy Options

Informal peddlers still constitute an essential part of the informal economy and are functioning without a governing act. Those peddlers are willing to improve their level of living conditions without having any of the supporting infrastructure or financial services. It is obviously known that it is difficult to regulate the informal peddlers as they do

not have a specific place. Therefore the proposed policy options include innovative ones that keep their exclusive nature of moving from one place to another, keep the civilized image of the transportation means and keep the right of the state in taxation and strengthening the formal economy.

Policy Options/ Alternatives Analysis

Criteria for comparing and recommending policy alternatives:

This policy paper will depend on seven evaluation measurable criteria to each of the proposed policy to be able to compare between them and select the most convenient policy to the key stakeholders and the Egyptian social and economic exclusiveness:

Policy Option/ Criteria	Description	Questions
Technology Criteria	This criterion measures accessibility from different key stakeholders, logical linkages in the process, interactive support mechanisms in case of technical problems, level of privacy and security for the stored data and the sustainability of the usage (Tool Evaluation Criteria, 2020). The following questions are important to be answered for an efficient assessment:	<ul style="list-style-type: none"> • Can the proposed technological tools be applied in different platforms (PCs, mobiles, etc.)? • Is the technology accessible and easy to use for all stakeholders? • Is there evidence that this technology will meet the intended goals? • Does the tool provide adequate and accessible user support and communication?
Financial Criteria	This criterion measures the appropriateness and the effectiveness of the estimated budget in terms of the return of the implementation of the policy including nature, size, complexity, and risk profile of the policy (Office of the Superintendent of Financial Institutions). The following questions are important to be answered for an efficient assessment:	<ul style="list-style-type: none"> • Will the implementation cost be compensated? • Is the financial cost available? • Are there any additional sources of financing rather than the government?

Policy Options/ Alternatives Analysis

Political Acceptability Criteria	<p>The political criterion is considered the base for the success of any policy. Gaining political acceptance is vital for the implementation. It is important to accurately define the politicians who are primarily involved in the policy implementation to start the consultations with them and start building a network of trust with other secondary stakeholders (California State University). The following questions are important to be answered for an efficient assessment:</p>	<ul style="list-style-type: none"> • To what extent will the proposed policy option be accepted by the primary stakeholders? • Is the proposed policy in alignment with the State public policy, the vision, and the legislation?
Technical Feasibility Criteria	<p>The technical criterion measures the desired level of reliability and validity of the policy. They also assess whether the available resources will contribute to the implementation and the expected duration to implement the policy (California State University). The following questions are important to be answered for an efficient assessment:</p>	<ul style="list-style-type: none"> • Is the expected timeframe acceptable for the implementation? • Are the available resources sufficient to initiate the implementation process?
Equity Criteria	<p>The equity criterion aims to measure the inclusiveness of the policy in order to avoid any kind of injustice for other segments in the society. Also, it ensures that the expected burdens and benefits are equal to all engaged stakeholders (California State University). The following questions are important to be answered for an efficient assessment:</p>	<ul style="list-style-type: none"> • Will implementing this policy result in increasing the burdens on a specific segment in the society that share the same characteristics? • Will the intended benefits generated from the policy be exclusive to a certain segment of the society that shares the same characteristics?
Effectiveness Criteria	<p>The effectiveness criterion assesses the direct intended outputs of the policy and its contribution to the achievements of the policy outcomes and objectives. This criterion is positively linked to the efficiency criterion, when one is succeeding, therefore the second one will be achieved. It is important to analyze the consequences if the intended outputs of the policy are not occurring (the counterfactual) (Ministry of Foreign Affairs, Netherlands). The following questions are important to be answered for an efficient assessment:</p>	<ul style="list-style-type: none"> • To what extent do the policy elements achieve the intended key performance indicators, compared to the baseline ones. • What are the changes that occurred and observed as a result of the intervention implementation?
Efficiency Criteria	<p>The OECD Development Assistance Committee describes efficiency as the transformation of inputs into results (achieve the intended objectives and outcomes). So, it is based on the transformation of costs into benefits (measured by the benefit-cost ratios) (Palenberg, 2011). The following questions are important to be answered for an efficient assessment:</p>	<ul style="list-style-type: none"> • Have appropriate inputs been deployed at the lowest possible cost? • Does the generated data provide an adequate description of the intervention's result chain? • Is the proposed policy option achieving more elements of the intended objectives compared to the other proposed policy options?

Policy Options/ Alternatives Analysis

Policy Option (1): Relocation with heavy consultations with the informal peddlers

Description:

The relocation of informal peddlers is one-policy option. The officials can stick to the same current policy that is related to re-locating the peddlers to another area. This area location is recommended to be beside the Metro and railway stations, like the Syrian exhibitions that are located in the middle of the vital streets. In this option, the peddlers will not leave the place that is suitable to them (right to work), and the customers will still resume their shopping habits as part of their daily routine without going to a different place (right of the public space) and the government can maintain the order and the civilized image of the transportation areas and collect the legal fees and taxation (the economic right). Before applying this policy option, the government is recommended to initiate a dialogue with the informal peddlers' representatives and communicate the best options to regulate them and talk to them not in a condescending manner involving a treatment that is full of respect and dignity to reach an agreement that is suitable to both parties (Natawidjaja, Rahayu and Sutrisno, 2015).

The government is recommended to provide all the needed facilities including parking, shelters near to the means of transportation with a reasonable rent price and fees that may increase annually based on the size of sales.

Advantages of this policy option:

- The peddlers will be close to the Metro and railways stations.
- The customers still have an easy access to reach the new market.
- The state will be able to collect the fees and the taxes from the peddlers, as they will be licensed.
- A good place for promoting the touristic products.

Disadvantages of this policy option:

- In the beginning, a reduction in sales may occur until the customers be recognized with the new location and be encouraged to visit.
- Later on, some of the large companies may be involved in this market that may affect the sales of the peddlers.

Policy option (2): Use the Communication technologies (ICTs) tools in arranging the informal peddlers in the means of transport

Description:

One of the challenges that are facing controlling the goods promoted by the informal peddlers is the low-quality products, stealing, harassment and tax evasion. One of the current methods to overcome these challenges is using technology including the usage of the QR code, mobile techniques and smart IDs, so that the official authorities as well as the customers can reach the peddlers either for the state inspection/ supervision or customers looking for the goods (Son et al., 2019). The informal peddlers are related to a different world that is not visible in a good way to the government, they need to feel integrated into the community, and the technology will give them the opportunity to adhere to the Egyptian constitution's aim of inclusion of all segments of the society, especially the vulnerable ones (Chen, 2016).

Informal peddlers could use the mobile phones applications to simplify the financial payments, and the authorities will be able to track them (Chen, 2016), as in the Census experience by CAPMAS while conducting this national survey and tracking the data collectors by distributing a sim card with GPS. A different type of license can be provided to the peddlers, which is moving tracked licenses with a unique identification electronic card that obtains all the information about the peddlers and clarify all the peddlers' information including the sales size, the required fees, track the license expiry,

Policy Options/ Alternatives Analysis

specify the working hours ... etc. Also, the Government is recommended to provide incentives to those who use this kind of technology, for example, free rides during their work time, reducing the amount of fees and taxes, and more flexibility in moving between Metro stations.

A joint training by the MSMEDA and the non-governmental organizations (national and international) can be provided to the informal peddlers on eliminating the illiteracy of using the technology and encouraging them to use it emphasizing on the financial return on them and the intended accessibility to a larger market. Also, these trainings will help the informal peddlers to contact a wide range of suppliers and contractors. For the governmental goal of enhancing the civilized image of the Metro and railways stations, a uniform can be provided to the peddlers and attracting the sponsors to advertise on these shirts, which will provide a new source of profit to the Metro and railways authorities.

Advantages of this policy option:

- Provide a huge market for the government, enhance the quality of the products, and help the informal peddlers to access the exports market.
- Cope with the international trends in using the technology and provide an easy monitoring system for the informal peddlers that is accessible by different stakeholders.
- Contribute to ending all the types of corruption, bribery, and disrespect of the law.
- A start of developing a national digital database on one of the main informal sectors.

Disadvantages of this policy option:

- Weak knowledge of the informal peddlers in using technology.
- Not all the informal peddlers have smart phones.
- A national information infrastructure to be provided, which will put a financial burden on this option to be implemented

Policy option (3): Including the informal peddlers in the kiosks inside the Metro and railway stations

Description:

This policy option recommends adding some changes to one of the currently implemented policies which is the kiosks in the transportation stations, since the existing kiosks in the Metro and railway stations have become a fact but need to be more spread economically and socially to include all segments of the society.

The Egyptian Company for Metro Management and Operation offers the kiosks through public auctions based on the highest bid. The suggested policy here is to divide the auctions into two types which are public auctions for companies and public auctions for individuals. To overcome the high rent price for these kiosks, the suggestion is to decide on the price based on the number of sales per month, and to be calculated based on the agreed percentage of the revenues. In addition, the policy recommends adding peddling as a profession in the national ID and treat them as formal peddlers.

Advantages of this policy option:

- Adding the peddlers' profession on the IDs will provide a database on their activities and locations.
- Being identified in a legal way by the government will give the informal peddlers an opportunity to be involved in the social insurance system, health insurance, and will enable them to have a bank account.

Disadvantages of this policy option:

- A challenge will occur for the informal peddlers who will not be able to have one of these kiosks, so the informality of vending will still continue in the means of transportation.
- Companies may apply as individuals to win the kiosks, and this will limit the opportunities of the informal peddlers to have one of them.

Policy Options/ Alternatives Analysis

Comparing criteria for the proposed policy options:

Policy Option/ Criteria	Policy Option (1): Relocation with heavy consultations with the informal peddlers	Policy option (2): Using the Communication Technology (ICTs) tools in arranging the informal peddlers in the transportation means	Policy option (3): Including the informal peddlers in the kiosks inside the Metro and railway stations
Technology Criteria	Very basic technology is needed to implement this policy option including basic infrastructure and a limited media campaign to inform the potential customers about the new area.	This policy option requires a robust ICT technology and linkages between different databases. It will be one of the national projects that may need an intensified coordination between different stakeholders.	No technological aspect is needed in this policy option.
Financial Criteria	Medium financial constraints are expected as the authorities will allocate a small booth/ kiosk for each vendor surrounded by a fiercer or wooden wall, and later on, all the costs will be collected in kind of rent and fees.	Medium financial constraints are expected in the implementation of this policy option. Developing this kind of database will require a large amount of investment, but the return will compensate for this investment.	The same financial constraints will remain, and the government will afford additional costs to provide new kiosks in the stations. However, this will be re-collected through the paid fees and the stations' revenues from these kiosks (as metro and railways stations are economic authorities).
Political Acceptability Criteria	This policy option is expected to receive the approval of the politicians and achieve their goal of removing the informal peddlers from the stations.	This policy option is expected to receive the approval of the authorities since the President and the government's priorities include fostering the move to digital transformation and digitalizing all transactions to be included in a unified database. Moreover, the civilized image of the transportation means will be solved and will provide a more regulated system for the informal peddlers.	The political will is likely to occur as it is already an ongoing policy.

Policy Options/ Alternatives Analysis

Technical Feasibility Criteria	Establishing a commercial market near to the stations is technically feasible in terms of technology as only a limited technology is needed, and an easy kind of observation can be provided to maintain order in the market. Also, the timeframe of implementing this policy is ranging from 1 to 3 months, so it is feasible in that regard. In addition, the satisfaction of the public is more likely to be obtained.	Developing this kind of digital platforms and smart identification cards are not hard for implementation as this is not the first experience in the government in it (e.g., the Farmers' Card experience). The time needed to implement this solution may range from 12 to 24 months, but it is recommended to be implemented in stages.	Kiosks inside the Metro and railway stations are decreasing the traffic in the cars. Thus the revenues of the 2 authorities will be increased with the extension of the number of kiosks in transport. The timeline of the implementation is from 1 to 2 months, and the nature of these kiosks is already known.
Equity	This concerns the equity between the informal peddlers and the shops inside the stations that are regulated and committed to providing rents and fees to the authorities. The value may differ at the beginning until the peddlers' businesses gain a foothold.	Equity may be partially achieved. These informal peddlers will gain advantages that are not available to the shoppers inside the stations. Also, they will pay less fees as they will not rent any places to offer their products.	Kiosks are 100% a proof of equity and rights for these peddlers, as this will give them the same rights that other firms and individuals enjoy, and also, the same level of the financial burden.
Effectiveness Criteria	The policy of relocating the informal peddlers in markets near to the stations is effective in the sense that their locations will be known to the authorities. They will no longer evade paying the fees and taxes and the civilized image of the stations will be obtained.	The policy of using the technology in regulating those informal peddlers is not only contributing to solving this problem, but also can be extended to solve the issues of the other vendors in the streets and other places to have a well-developed database on one of the main informal economies in Egypt, regulating them and preserving the right of State in taxation.	This policy achieves the State objective to have a civilized image of the means of transport, provides an option which is similar to the duty-free shops at the airports, provides steady and stable work for the peddlers, and includes them in the formal economy.
Efficiency Criteria	This policy contributes to achieving the state goal of organizing the vendors in a specific place at a medium cost and also provides the stability and legal situation to the informal peddlers, and sustains their work with a good profit.	This solution is more costly to the proposed one, but it achieves mutual goals for the two parties and contributing to involving a new market in the national economy.	This kind of regulation will create different kiosks in the means of transport with different activities that will provide kinds of clusters in one place and initiate a good example of a formal regulated economy. Also, this option will end the conflicts between the police officers and the vendors, and will no add any additional costs to the Metro and railways entities.

Policy Options/ Alternatives Analysis

Policy Option	Technology	Financial	Political	Technical	Equity	Effectiveness	Efficiency
Policy Option 1	●	▲	■	■	■	■	■
Policy Option 2	■	▲	■	■	▲	■	■
Policy Option 3	●	●	■	■	■	■	■

● Low ▲ Medium ■ High

Conclusion and Recommendations

Decision Rule:

The decision rule that the authors depended on is the technological criteria. As being in a world that uses technology in each aspect of daily life, and as Egypt is becoming one of the leading developing countries in adopting the digital transformation in different fields, it is recommended to be used in handling the informal peddlers' issue. This will also contribute in achieving the government's plan to address an integrated database management system.

Implementation Plan:

In response to the chosen policy option, an implementation plan is proposed with a suggested timeline to determine the steps that are recommended to be followed to guarantee the success of the policy implementation. Before presenting the main points of the plan, 3 core steps should be achieved to have

an efficient implementation.

1. Social Insurance Coverage

Social insurance contributes to alleviating the social problem resulted from the informality, decreasing the vulnerability and reaction to the economic shocks, and therefore enhancing the individual's welfare and reducing the pressure on the state social safety nets (Gatti et al., 2014). One of the important incentives to the transportation peddlers is to provide a robust social insurance system that will give them the sense that they are well considered segment in the society, then will follow, and respect the regulations (cost-benefit approach).

A consultation is recommended to be initiated with MOSS to discuss the possible insurance systems that could cover the transportation peddlers in collaboration with the Ministry of Finance.

Conclusion and Recommendations

2. Develop a training needs assessment survey (Enhancing the productivity of the informal peddlers through training and skills upgrading)

The government is recommended to partner with international and national organizations to provide capacity building and training to the informal peddlers. This will contribute to promoting the productivity and provide potential interventions to achieve the inclusive growth and the application of the SDGs slogan “leave no one behind” (Gatti, et al., 2014).

These trainings may also be provided by the private sectors, universities as part of the general services endorsed by the Ministry of Social Solidarity. The trainings should also contain skill-upgrading programs, that will not just be promoting their work as an informal peddler, but also will enhance their skills and knowledge to increase their employment opportunities and upgrade their standard of living from transportation peddlers to obtain a fixed work. The engagement of the private sector could be part of the corporate social responsibility (CSR) towards the community, in addition to different incentives that could be provided to these participating companies.

Later on, vouchers can be provided to the transportation peddlers to enroll in the trainings through an application to increase the competition between the providers from the private sector companies to increase the effectiveness of these trainings (Gatti, et al., 2014). Eventually, the objective of conducting these trainings is to enhance the peddlers’ knowledge and skills and be promoted to a small entrepreneur.

3. Licenses

The policy suggests an amendment to the existing regulations including issuing a type of smart licenses with an identification number to be provided to the transportation peddlers that contain all the information on the

activity, provided with QR code and GPS to track the position of the vendor during the agreed working hours and record the size of sales and the required fees or penalties which are recommended to be on a gradual basis based on the sales rate. In addition, the regulation is recommended to state the withdrawal of the license if the occurrences of the violations are repeated, with prior alerts to the peddlers, that may lead to end the license, with prior notification, if the peddlers did not stop the violations.

Moreover it is recommended that the proposed fees be included in the existing law and be a gradual one based on the size of profit which differs from one vendor to another. It is also recommended to include the technology in issuing these licenses and renewing them. This also will require design trainings for the transportation peddlers. This policy option depends on the cost-benefit approach. The State is missing a large amount of its right of taxations and counts this as part of the informal economy. At the same time, the peddlers are not feeling secure and do not have a stable job. This option is targeting to reduce the costs and increase the benefits to both parties.

Modality of the QR code and the smart identification number

1. Develop a website and application on smart phones to register and provide all the details on the peddlers and the business.
2. Provide the availability to register through newly established offices in different Metro and railway stations (one-stop shop).
3. Each of the peddlers will receive an identification number in the database to facilitate any further procedures whether manually or digitally and be used in any further buying from suppliers or contractors and selling to citizens.

Conclusion and Recommendations

Benefits of the system

1. The system will register just one shop to each peddler.
2. The system will automatically check the license expiry date, any delayed installations from the peddlers, and any violations payments and the size of the business.
3. The system will provide 2 QR codes:
 - a. Personal QR code for the informal peddlers including personal information, sales, taxes, and fees.
 - b. Public QR code including information on the informal peddlers' business such as the commodities and the prices.

These QR codes will be sent directly to the peddlers using their unique identification number through the connected phone number or the email address (Hoang et al., 2019).

The informal peddlers will commit to provide receipts to the customers, so that the State can calculate the taxes, and also in the beginning, the State may provide incentives to those who commit to issuing the receipts.

Workplan:

A proposed workplan is provided as a guidance to the implementation.



Table 1: Workplan for the Proposed Policy Implementation

Steps/ months	Responsibilities/ partners involved	Mon- th 1	Mon- th 2	Mon- th 3	Mon- th 4	Mon- th 5	Mon- th 6	Mon- th 7	Mon- th 8	Mon- th 9	Mon- th 10	Mon- th 11	Mon- th 12	Mon- th 13	Mon- th 14
<i>Planning Stage</i>															
Design a concept note on the policy option	Transport and Railways authorities														
Start round of consultations with the key stakeholders from the government including the local authorities, Ministry of Communication and Information Technology, Ministry of Planning and Economic Development (the department related to the administrative reform), and MESMEDA	Transport and Railways authorities, MCIT, MoED, MSMEDA														

Conclusion and Recommendations

Steps/ months	Responsibilities/ partners involved	Mon- th 1	Mon- th 2	Mon- th 3	Mon- th 4	Mon- th 5	Mon- th 6	Mon- th 7	Mon- th 8	Mon- th 9	Mon- th 10	Mon- th 11	Mon- th 12	Mon- th 13	Mon- th 14
Hold consultation meetings with representatives from the transportation peddlers to discuss the opportunities and challenges of the proposed policy and listen to their fears and suggestions	Transport and Railways authorities, transportation peddlers														
Another consultation meeting with representatives from the private sector, NGOs, INGOs, experts, professors	Transport and Railways authorities, private sector, sponsors, NGOs, INGOs, experts, professors														
A final policy document to be presented to the Ministry of Transportation	Transport and Railways authorities														
Develop a detailed workplan for the implementation divided into stages	Transport and Railways authorities														
A more detailed plan to be developed including the vision, key performance indicators, opportunities and gaps, and steps of the implementations	Transport and Railways authorities after the consultations														
A detailed budget/ costs including all the inputs to be drafted															
Detailed timeline for the implantation to be developed															

Conclusion and Recommendations

Steps/ months	Responsibilities/ partners involved	Mon- th 1	Mon- th 2	Mon- th 3	Mon- th 4	Mon- th 5	Mon- th 6	Mon- th 7	Mon- th 8	Mon- th 9	Mon- th 10	Mon- th 11	Mon- th 12	Mon- th 13	Mon- th 14
Monitoring and Evaluation system to be recognized and to be monitored through an independent authority	Independent authority														

Implementation stage

MCIT starts the development of the QR codes, smart IDs and the database in collaboration with MoED (Administrative Reform branch)	MCIT, MoED														
MoSS starts the consultations with Transport and railways authorities and MoF on developing a social insurance system to the transportation peddlers	Transport and Railways authorities, MoSS, MoF														
A training plan to be developed	MSMEDA														
Piloting the plan to a chosen group vendor in specific stations in Metro and railways	Transport and Railways authorities														
Generalize the implementation plan through a plan contain stages (duration 6 months)															Starting from month 14 for 1 year

Conclusion and Recommendations

Implementation flow

It is recommended to have a simple and clear workflow depending on the policy of one stop shop to encourage the transportation peddlers to register.

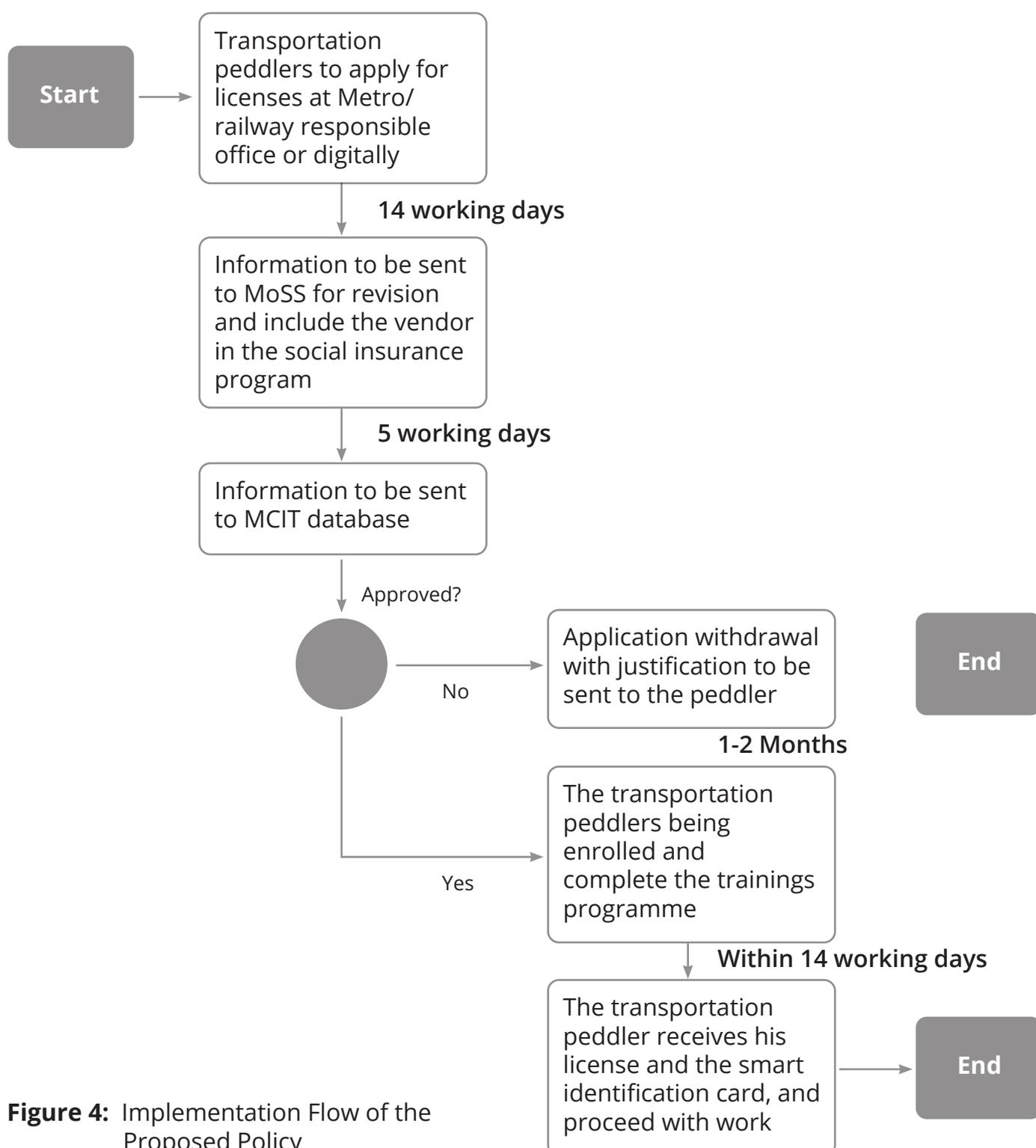


Figure 4: Implementation Flow of the Proposed Policy

Conclusion and Recommendations

Monitoring and Evaluation structure

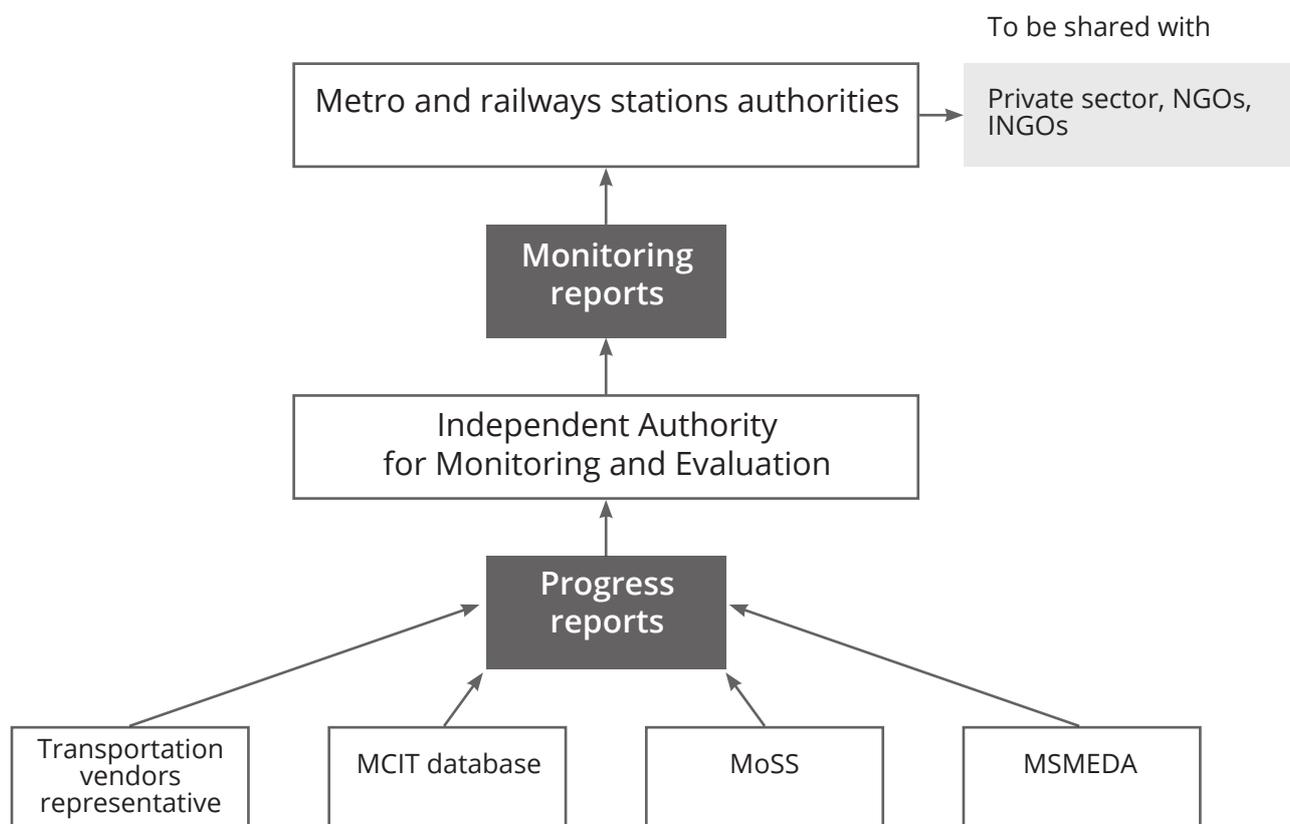


Figure 5: The Monitoring and Evaluation Structure of the Proposed Policy

The policy option recommends having a simple monitoring structure. A participatory monitoring and evaluation system is recommended to be developed including participation from the relevant governmental authorities, private sectors, NGOs, INGOs and also the transportation peddlers, where they can articulate their suggestions and any obstacles they are facing, to be part of the decision-making process, which will afford more efficient monitoring for this part.

The monitoring and evaluation process considers the most important stages of implementing the policy to guarantee the achievement of the intended outputs and outcomes. In this regard, a monitoring flow for implementing the policy is recommended through an independent authority. The monitoring

reports should be sent to the relevant transportation authorities, then a discussion is to be held to reduce the gaps, maximize the opportunities, and adopt any needed corrective plans/ procedures.

The main mandates of this independent authority are to conduct a baseline study on the transportation peddlers, revise the progress reports received from the relevant governmental authorities that are part of the implementation process, review the KPIs progress, oversee the trainings outcomes, monitor closely the integrated database and the electronic system, and evaluate the outcomes of the policy and further the impact.

Conclusion and Recommendations

The main KPIs to be monitored include (after conducting the baseline study):

1. Percentage of the registered transportation peddlers.
2. Amount of newly collected taxes from the transportation peddlers.
3. Percentage of the included peddlers' market in the formal economy.
4. Amount of the revenues for the transportation authorities.

In addition, a sustainable strategy and graduation/ exit strategy is recommended to be developed. These strategies will guarantee the effectiveness of the implementation and will provide a periodic assessment of the intervention.

Community Engagement

Role of the media:

The media should perform a positive role in this transition period to the transportation peddlers from informal to formal ones by setting interviews with the successful peddlers, illustrating the procedures, clarifying the obstacles or challenges and areas the need improvements.

Role of the public:

The public should support the new policy, stick to the announced new procedures and back the transportation peddlers' work.

Risks and Risk Mitigation/ Limitations and Unanticipated Consequences

The proposed policy involves a number of risks that may affect the successful implementation, and which need to be considered in the early stages of the implementation. Hereunder, for example, but not limited to, are some of the expected risks:

1. Risks with high impact and low likelihood to occur include:
 - a. Lack of a secure wireless network underground.

- b. Resistance of the transportation peddlers.
- c. Needed budget/ cost.

2. Risks with high impact and high likelihood to occur include:

- a. Coordination with different stakeholders.

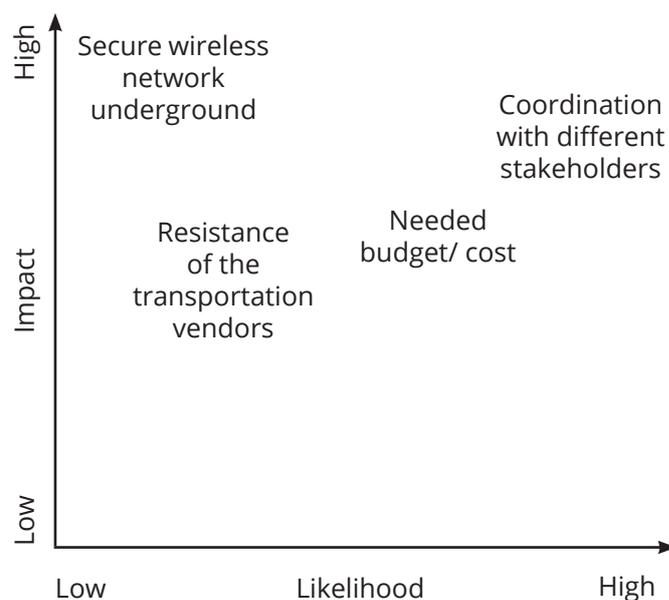


Figure 6: Risk Assessment

Conclusion and Recommendations

Conclusions

This policy option provides an innovative policy that supports the three mentioned rights: the right of space, the economic right, and the right to work. Also, it provides a compromising solution to both parties, as the informal peddlers will not leave their positions in the means of transport and will not continue the “hide and seek” approach with the police officers.

In addition, this policy option provides a more stable and secured situation to the informal peddlers including having social insurance and the potential to expand their businesses. Besides, the transportation entities (both Metro and railways) will preserve their right in collecting the service charge, increase their revenues, determine the size of this peddling, and keep the civilized image of the means of transport.

Recommendations

At the end of this policy paper, the authors recommend the following for a better implementation of the proposed policy:

1. The government is recommended to conduct a needs assessment study/ situation analysis for the informal peddlers and attract donors to fund the study to determine the size of this market, the number of informal peddlers who are participating in each market, and the level of income through their businesses.
2. Each Metro station and railway station is recommended to provide the capability of the establishment of commissions, local bodies and labor unions that are representing the needs, suggestions and requirements to each group of peddlers and facilitate the mediation and conflicts between the peddlers and the key stakeholders. Also, the stations may provide suggestions to the peddlers on the activities and areas of collaboration that they can perform and serve the customers' needs.
3. The government is recommended to deal with the informal peddlers as potential entrepreneurs not as a private sector.
4. The Metro and railways officials are recommended to conduct customers' surveys during the trips to receive the customer's opinions for the gaps, needs and innovative suggestions.



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THE PUBLIC POLICY HUB

Where Rigour Meets Creativity

The Public Policy HUB is an initiative that was developed at the School of Global Affairs and Public Policy (GAPP) in October 2017. It was designed to fill in the policy research gap in Egypt. It provides the mechanism by which the good ideas, plausible answers, and meaningful solutions to Egypt's chronic and acute policy dilemmas that are proposed by the country's best minds, the experienced and the creative from different age brackets, can be nurtured, discussed, debated, refined, tested and presented to policymakers in a format that is systematic, highly-visible and most likely to have a lasting impact.

It is designed to develop a cadre of well-informed and seasoned policy developers and advocates, while simultaneously fostering and promoting creative solutions to the challenges facing Egypt today. The project provides a processing unit or hub where policy teams are formed on a regular basis, combining experienced policy scholars/mentors with young creative policy analysts, provide them with the needed resources, training, exposure, space, tools, networks, knowledge and contacts to enable them to come up with sound, rigorous and yet creative policy solutions that have a greater potential to be effectively advocated and communicated to the relevant policymakers and to the general public.

Since its establishment, the Public Policy HUB has been supported by Carnegie Corporation of New York, UNICEF Egypt, and Oxfam. The Hub had partnerships with different ministries and governmental institutions like the Ministry of Social Solidarity, Ministry of Planning, Ministry of Health, Ministry of Trade and Industry, Ministry of Local Development, Ministry of Education, Ministry of Environment, National Council for Childhood and Motherhood, National Population Council, and General Authority For Transportation Projects Planning.

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