

Delivery Order No. 15
Project No. 936-5555
Contract No. DHR-5555-Q-00-1085-00

**Consideration of Biological
Diversity and Tropical Forestry
in the Context of
Country Program Strategy Planning
in the Bureau for Africa:
Review and Guidelines**

by

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November 1994

Prepared for

Office of Sustainable Development
Division of Productive Sector Growth and the Environment
Bureau for Africa
U.S. Agency for International Development

by

Environmental and Natural Resources Policy and Training (EPAT) Project
Applied Research, Technical Assistance and Training
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Arlington, Virginia, U.S.A.

Table of Contents

Preface	i
List of Acronyms	iii
Executive Summary	v
1.0 The Issue: Tropical Forests and Biodiversity	1
2.0 Congressional Interest in the Environment	3
2.1 Sections 118 and 119 of the Foreign Assistance Act, as amended	3
2.2 Section 117: Environment and Natural Resources	6
2.3 Section 496: The Development Fund for Africa	6
2.4 Section 533(c)(3) of the Foreign Operations, Export Financing, and Related Programs Appropriation Act, 1991	7
3.0 Agency Actions: Guidance to Field Missions	9
3.1 Strategies for Sustainable Development	9
3.2 Plan for Supporting Natural Resources Management in sub-Saharan Africa	10
3.3 Development Fund for Africa	11
3.4 USAID Guidance Cables for Strategic Planning	12
3.5 Bureau Guidance on Sections 118 and 119	13
3.6 Other Pertinent Guidance: Environmental Assessment	14
4.0 Mission Response to Agency Guidance	17
4.1 Factors Underlying the Variability of Mission Responses	17
4.2 The Adequacy of Completed Assessments of Biological Diversity and Tropical Forests	18
5.0 Guidance to Teams and Missions in the Preparation of Assessments of Tropical Forest and Biological Diversity	25
5.1 Guidelines for Missions	25
5.2 Cautionary Considerations	26
5.3 Guidelines for Teams	27
5.4 Suggestions for Improvements	29
6.0 Relevant Readings	33
Bibliography	35
Appendix A: Relevant Legislation and Cables	39
Appendix B: Guidelines for Strategic Plans, 1994, Draft # 9	57

Appendix C: USAID's Environmental Procedures (22 <i>CFR</i> Part 216)	69
Appendix D: Assessments of Tropical Forests and Biological Diversity and Policy Papers	85
Appendix E: Examples of Assessments of Tropical Forests and Biological Diversity	87
Appendix F: Cameroon Concept Paper Excerpt	103
Appendix G: Generic Scope of Work for Preparation of CPSP-Related Background Studies on Biological Diversity and Tropical Forests	109

Preface

The cooperation of many people facilitated this report's completion. In particular, U.S. Agency for International Development staff in Washington, especially Tim Resch (Bureau for Africa, Office of Sustainable Development), Michele Adams-Matson (Bureau for Africa, Office of Development Planning), and Jim Hester and Glenn Prickett (Bureau for Policy and Program Coordination, answered many questions and provided insights into the policies and frameworks within which the agency's strategic planning occurs. In addition, several experts who have been involved with assessments of tropical forestry and biological diversity were interviewed. Michael Painter of the Institute for Development Anthropology provided information gleaned from his experience in examining environmental issues for USAID/Mozambique. Mary Ann Lewis and Mark Hardin, KBN Engineering and Applied Sciences, Inc., assisted in completing the report. Everyone who was contacted was helpful, but the assistance received from the above-mentioned people was extraordinary.

List of Acronyms

CEP	Country environmental profile
CDSS	Country Development Strategy Statement
CFR	<i>Code of Federal Regulations</i>
CPSP	Country Program Strategic Plan
DFA	Development Fund for Africa
EA	Environmental assessment
EIS	Environmental impact statement
EPAT	Environmental and Natural Resources Policy and Training Project
IEE	Initial environmental examination
IIED	International Institute for Environment and Development
IUCN	International Union for the Conservation of Nature
NEAP	National Environmental Action Plan
NEPA	National Environmental Policy Act
NGO	Nongovernmental organization
NRDC	Natural Resources Defense Council
PVO	Private voluntary organization
SD/PSGE	Office of Sustainable Development, Division of Productive Sector Growth and the Environment
USAID	U.S. Agency for International Development
USAID/W	U.S. Agency for International Development/Washington, D.C.
USEPA	U.S. Environmental Protection Agency
WCMC	World Conservation Monitoring Center
WRI	World Resources Institute
WWF	World Wildlife Federation

Executive Summary

The U.S. Agency for International Development's (USAID) Bureau for Africa places tropical forestry and biological diversity conservation at the center of its environmental programming. USAID's experiences with integrating environment and development are articulated in several recent documents, including *Environment and Natural Resources* (1988), *Environment Strategy* (1992a), and the *Strategies for Sustainable Development* (1994b). These documents focus on five long-term constraints to development:

1. Loss of tropical forests and other habitats critical for biological diversity,
2. Urban and industrial pollution,
3. Degradation and depletion of water and coastal resources,
4. Environmentally unsound energy production and use, and
5. Unsustainable agricultural practices.

The Bureau for Africa's environmental strategy (USAID 1992b) focuses on two of these five issues: unsustainable agricultural practices and loss of tropical forests and other critical habitats for biological diversity. The bureau's technical priorities emphasize preventing loss and degradation of vegetation, curbing soil erosion, stemming declines in soil fertility and biological diversity, and promoting integrated pest management.

USAID is legally obligated to conduct assessments of tropical forestry and biological diversity in accordance with the requirements of Sections 118 and 119 of the Foreign Assistance Act. Though each USAID mission and regional office is required to prepare such an assessment as part of its strategic planning process, responses have been uneven in quality. The Bureau for Africa therefore commissioned the present study to examine missions' responses to the requirement for preparation of assessments and to suggest guidelines for use by missions and assessment teams that assures greater uniformity and appropriate consideration of the two topics.

This report reviews and analyzes previous assessments, legislation, cables, and other agency documents that influence the preparation of strategic plans and consideration of tropical forests and biological diversity. An analysis of several assessments and Country Program Strategy Plans (CPSPs) completed in Africa resulted in the proposal of guidelines and relevant background information for use by missions as well as teams that are asked to conduct assessments of tropical forestry and biological diversity. The report also discusses briefly other relevant legislative mandates affecting USAID's management of environmental and natural resources in developing countries. The appendices contain the full text of relevant legislation, cables, examples of successful assessments, draft implementation guidelines for USAID's *Strategy for Sustainable Development*, and a generic scope of work.

USAID has responded to congressional directives regarding tropical forestry and biological diversity by incorporating consideration of those issues into agency-wide strategy documents and dispatching guidance cables to missions. Bureaus' and missions' actions in response to the requirements in Sections 118 and 119 are varied. For USAID's missions in sub-Saharan Africa the review demonstrates a continuum of

conformance that ranges from noncompliant to fully compliant. Noncompliant missions either have no written treatment of biological diversity and tropical forestry in their strategy documents or refer to these topics in minimal terms unsupported by analysis. Nominally compliant missions provide targeted consideration of the topics but rely on other sources for analyses rather than on assessments of biological diversity and tropical forestry conducted in conjunction with the development of strategic plans. Fully compliant missions integrate the topics into their strategic planning and support the effort with comprehensive assessments of biological diversity and tropical forestry.

The variability of missions' response to the requirements of Sections 118 and 119 are addressed in a series of recommendations for follow-up action, as summarized.

- The Bureau for Africa should prepare and send guidance cables to each mission that unequivocally present the obligation to prepare assessments of biological diversity as part of strategic planning, regardless of individual program status.
- USAID should develop guidelines for the execution of assessments of tropical forest and biological diversity in the interest of standardizing mission response, ensuring full compliance with the law, and demonstrating through action the agency's commitment to sustainable development.
- USAID should provide missions with updated information about strategies for the management of tropical forest and biological diversity.
- Teams responsible for assessments of tropical forest and biodiversity should be allowed sufficient time and provided with ample support for gathering international and locally available background information prior to the initiation of analyses.

1.0 The Issue: Tropical Forests and Biodiversity

Deforestation has pervasive negative effects on the environment, leading to soil erosion, loss of biological diversity, and threats to human well-being. The loss of tropical forests, especially through burning, can lead to global climate change and consequent alterations to agricultural productivity. Deforestation stems from several root causes, including the need for fuelwood, more agricultural land, building materials, animal control, and foreign exchange. As tropical forests are degraded or destroyed, biological diversity is also threatened, since 50 to 90 percent of all species live in tropical forests (USAID 1994a).

The annual rate of deforestation in Africa is estimated to be about 4.1 million hectares or 0.7 percent (USAID 1994a). The loss of forests and species has wide ecological consequences, some of which are unknown and unstudied. Biological diversity has enormous potential value in terms of medical and agricultural applications, yet is being lost rapidly in Africa due to poor or absent management. USAID's Bureau for Africa recognizes the importance of tropical forests and the conservation of biological diversity in Africa and places both at the center of its environmental programming. The Bureau for Africa is focusing on two major constraints to development in Africa: unsustainable agricultural practices and the loss of tropical forests and other critical habitats for biological diversity.

Box A. Terminology

Biological diversity. Biological diversity refers to the variety and variability among living organisms and the ecological complexes in which they occur. It can be measured at four levels: biomes (e.g., tropical moist forests, coastal wetlands, etc.), ecosystems (a portion of a biome in which living organisms seem to be self-sustaining), species, and genetic varieties within species.

Tropical forests. Ecosystems occurring within tropical latitudes with a minimum of 10 percent crown cover of trees and/or bamboos, generally associated with wild flora, fauna, and natural conditions, and not subject to agricultural practices. This includes forests in all ecological zones, the main tropical types of which are rain forests, moist

USAID is legally obligated to conduct assessments of tropical forests and biological diversity to guide strategic planning for sustainable development as specified in Sections 118 and 119 of the Foreign Assistance Act. The response of missions to the requirements of the legislation has not been consistent;

hence, the Bureau for Africa commissioned the present study to examine missions' responses to date and to develop a set of guidelines for use by mission and assessment teams to ensure uniform quality and appropriate response to the legislation. The primary audience is USAID's missions in sub-Saharan Africa and the teams that conduct assessments of tropical forests and biological diversity; recommendations for action are meant primarily for the Bureau for Africa.

The study is divided into six sections. Section 1 briefly outlines the issues of tropical forestry and biological diversity. Section 2 details congressional interest in these topics as well as related environmental issues. Section 3 summarizes the agency's guidance to missions and regional bureaus in order to respond to the statutory mandates. Section 4 analyzes several assessments of tropical forests and biological diversity that have been completed for missions in sub-Saharan Africa. Section 5 provides guidance to assessment teams, missions, and the Bureau for Africa regarding the preparation of assessments of tropical forests and biological diversity. Section 6 briefly lists relevant readings, including legislation, cables, and important USAID documents on strategic planning.

2.0 Congressional Interest in the Environment: Directives to the U.S. Agency for International Development

2.1 Sections 118 and 119 of the Foreign Assistance Act, as amended

The current legal basis for USAID's involvement in tropical forestry and biological diversity results from two amendments to the Foreign Assistance Act, namely Sections 118 and 119 (see Box B for an abridged text and Appendix A for the full text). The Congress's intent in approving the amendments in 1986 was to alert the agency and the foreign assistance community to strong congressional interest in the wise and prudent management of environmental resources in countries where the United States provides assistance. The amendments require that assessments of tropical forests and biological diversity be prepared on a country-specific basis, be reflected in USAID's strategy document for each country, and addressed in annual reports covering progress on strategic objectives. The delegation of responsibility to missions represents a change toward greater accountability than was present under the previous legislative language, which required assessments from USAID or regional bureaus.

In particular, the 1986 amendments focus on tropical forestry and endangered species, the latter interpreted in the larger sense as the conservation of biological diversity. The inclusion of these two sections was a direct outcome of a series of congressional hearings held in 1984 and 1985 that featured expert testimony from environmental nongovernmental organizations (NGOs). The U.S. House of Representatives' Subcommittee on Human Rights and International Organizations held open sessions in early 1986, before which the World Resources Institute (WRI), the Natural Resources Defense Council (NRDC), the World Wildlife Federation (WWF), International Institute for Environment and Development (IIED), and others provided expert testimony. The National Audubon Society, the Sierra Club, the Ecological Society of America, and the International Union for the Conservation of Nature (IUCN) also submitted written material for these proceedings (U.S. House of Representatives 1986a).

Although USAID had increased its program activity in forestry in the early 1980s, the subcommittee found that the number of programs was decreasing because recipient countries had neither the scientific knowledge nor background to proceed with technical programs. In environment and natural resource areas other than tropical forestry, USAID had been even less active. The subcommittee therefore stated that USAID should be encouraged to accelerate and expand its institution building and training efforts in the tropical forestry sector.

Box B. Abridged Text of Sections 118 and 119

Section 118. Tropical Forests

Importance of Forests and Tree Cover

In enacting Section 103(b)(3) of this act, Congress recognized the importance of forests and tree cover to developing countries. Congress is particularly concerned about the continuing and accelerating alteration, destruction, and loss of tropical forests in developing countries pose a serious threat to development and the environment. Tropical forest destruction and loss:

1. Result in shortages of wood, especially wood for fuel; loss of biologically productive wetlands; siltation of lakes, reservoirs, and irrigation systems; floods; destruction of indigenous peoples; extinction of plant and animal species; reduced capacity for food production; and loss of genetic resources; and
2. Can result in desertification and destabilization of the earth's climate.

Properly managed tropical forests provide a sustained flow of resources essential to the economic growth of developing countries, as well as genetic resources of value to developed and developing countries alike.

Country Analysis Requirements

Each country development strategy statement or other country plan prepared by the Agency for International Development shall include an analysis of:

1. The actions necessary in that country to achieve conservation and sustainable management of tropical forests, and
2. The extent to which the actions proposed for support by the agency meet the needs thus identified.

Section 119. Endangered Species

Congress finds the survival of many animal and plant species is endangered by over-hunting, by the presence of toxic chemicals in water, air and soil, and by the destruction of habitats. Congress further finds that the extinction of animal and plant species is an irreparable loss with potentially serious environmental and economic consequences for developing and developed countries alike. Accordingly, the preservation of animal and plant species through the regulation of the hunting and trade in endangered species, through limitations on the pollution of natural ecosystems, and through the protection of wildlife habitats should be an important objective of the United States development assistance.

In order to preserve biological diversity, the President is authorized to furnish assistance under this part,..., to assist countries in protecting and maintaining wildlife habitats and in developing sound wildlife management and plant conservation programs. Special efforts should be made to establish and maintain wildlife sanctuaries, reserves, and parks; to enact and enforce antipoaching measures; and to identify, study, and catalog animal and plant species, especially in tropical environments.

Country Analysis Requirements

Each country development strategy statement or other country plan prepared by the Agency for International Development shall include an analysis of:

1. The actions necessary in that country to conserve biological diversity, and
2. The extent to which the actions proposed for support by the Agency meet the needs thus identified.

With regard to biological diversity, additional legislative hearings were held in 1985, with the WRI, NRDC, WWF, IIED, and other NGOs again providing expert testimony. Testimony during these hearings indicated that many of the U.S. government's activities had addressed biological diversity, but that the aggregate impact was small (e.g., of the 253 USAID projects associated with biological diversity, only five were exclusively devoted to issues relevant to Section 119) (U.S. House of Representatives 1986b). The experts' testimony was also critical of the existing version of Section 119 for having merely provided a simple list of options undifferentiated by priority or supported by action plans and implementation guidance. The original amendments to Section 119 were intended

to serve as a basis for allocation of USAID's funds and to help stimulate actions by other organizations. In contrast, the 1986 amendments to Section 119 require the agency to:

- Seek "close consultation with and involvement of local people at all stages of design and implementation" of projects,
- Utilize the expertise of NGOs whenever feasible, and
- Engage in a series of actions seeking *inter alia* to increase local knowledge, train local agencies, and enter into long-term agreements with host governments for the improved local management of biological diversity.

In the spring of 1986, staff from the Office of Technology Assessment, USAID's Bureau for Science and Technology, WWF, WRI, The Nature Conservancy, and the National Audubon Society provided additional testimony before the U.S. Senate Committee on Foreign Relations. In a meeting later that year, the committee summarized its concern over the losses of habitats and species, further noting that tropical deforestation and biological diversity are critical issues not only for developing countries but for the United States as well (U.S. Senate 1986).

One purpose of the new Section 118, which involves tropical forests, is to require USAID's consideration of major needs for the management of tropical forests in developing countries and to help establish funding priorities to address those needs. Congress further intended that the resulting analysis would serve to summarize major forest management issues in each country, thus filling critical gaps in data.

Despite the prevalence of such gaps, detailed environmental assessments had already been completed for many developing nations either by their governments or by indigenous or international NGOs. Therefore, the committee stated that each mission should review and consider existing detailed environmental assessments as a basis for formulating individual Country Development Strategy Statements (CDSSs) or country plan analyses and determine whether those environmental assessments could be included by reference into the CDSSs (U.S. Senate 1986).¹

Including Sections 118 and 119 in the Foreign Assistance Act may have succeeded in raising agency consciousness, as implied by the absence of language directly addressing tropical forests and biological diversity in draft legislation intended to replace the Foreign Assistance Act (i.e., the proposed Peace, Prosperity, and Democracy Act).² If enacted as originally proposed (and this is highly unlikely), the new

¹ USAID has subsequently redefined CDSSs as Country Program Strategy Plans (CPSPs), an operational change that thus far affects only USAID's missions in sub-Saharan Africa (see Section 4.0 in this report).

² This proposed legislation was introduced in early 1994 on behalf of the Clinton Administration, but the Congress did not act on it. With the adjournment of the 103rd Congress, the proposal thus died. If the administration chooses to pursue the goals inherent in the proposal, it will have to be resubmitted.

law would provide greater planning flexibility by allowing USAID's missions and offices to tailor their strategies to an individual country and to programmatic circumstances.

USAID staff and legal advocates from several environmental NGOs have suggested two reasons for omitting specific language on assessments of tropical forests and biological diversity in the proposed law. On the one hand, a major purpose of the proposed legislation is to eliminate redundant or obsolete provisions and earmarks and related administrative burdens. Though hardly an obsolete issue, the treatment of tropical forestry and biological diversity is now thoroughly integrated into national development priorities across Africa, a situation that would allow the language of new U.S. legislation an unencumbered focus on newer issues. On the other hand, and perhaps more germane to the existing Sections 118 and 119, the sections have contributed to the achievement of the desired results. They have raised USAID's consciousness, thus obviating the need for additional overt reference without eliminating the Congress's interest in these topics.

Moreover, representatives of USAID and NGOs who were interviewed for this report believe that the agency has recognized the importance of environmental issues, the issues have been integrated into host country programs, and future legislation can afford greater flexibility in setting priorities. Of course, until the Foreign Assistance Act is changed, the Bureau for Africa is obligated to follow the guidance for strategic programming as currently contained in Sections 118 and 119.

Sections 118 and 119 legally compel USAID and its staff in developing countries to address and analyze issues related to the protection of tropical forests and biological conservation. In addition, however, there are other sections of the Foreign Assistance Act that are pertinent to environmental issues and that have important implications for missions' actions, planning, project design, and implementation. Brief consideration of these sections serves to re-emphasize the Congress's overall interest in and commitment to environmental issues.

2.2 Section 117: Environment and Natural Resources

Section 117 emphasizes the need for the United States to exercise leadership in reassessing policies related to the environment and natural resources and in "cooperating extensively with developing countries in order to achieve environmentally sound development." To achieve this goal, the section indicates that: "Special efforts shall be made to maintain and where possible to restore the land, vegetation, water, wildlife, and other resources upon which depend economic growth and human well-being, especially of the poor." The section also requires USAID to "take fully into account" the impact of its activities on the environment and natural resources of developing countries. Where appropriate, Section 117(c)(1) encourages USAID to use local technical resources in preparing environmental assessments or impact statements that may be necessary.

2.3 Section 496: The Development Fund for Africa

Through an amendment to the Foreign Assistance Act in 1987, the Congress established a special assistance program for sub-Saharan Africa, the Development Fund for Africa (DFA). The DFA's purpose

is to "help the poor majority of men and women in sub-Saharan Africa to participate in a process of long-term development through economic growth that is equitable, participatory, environmentally sustainable, and self-reliant." To advance these purposes, the Congress directed USAID's attention to several critical sectoral priorities. For the purposes of this report, the DFA's key priorities include: a) increasing agricultural production in ways that protect and restore the natural resource base; and b) maintaining and restoring the renewable natural resource base primarily in ways that increase agricultural production.

Although one of the DFA's objectives is to provide USAID with flexibility in managing its assistance to sub-Saharan Africa, the Congress demonstrated its concern for environmental issues by indicating that USAID should spend at least 10 percent of the funds appropriated for the DFA to finance activities related to these two priorities. Moreover, to the extent that DFA-related efforts to promote development involve reforms of economic policies, Section 496(h)(2)(B) requires that "assisted policy reforms shall also include provisions to protect...long-term environmental interests from possible negative consequences of the reforms."

2.4 Section 533(c)(3) of the Foreign Operations, Export Financing, and Related Programs Appropriation Act, 1991

In addition to imposing requirements on USAID through amendments to the Foreign Assistance Act, the Congress can also do so through legislation that provides appropriations to the agency. Section 533(c)(3) provides such an example. It prohibits the expenditure of funds for any activity, program, or project that "would result in any significant loss of tropical forests" or involve "commercial timber extraction in primary tropical forest areas" unless an environmental assessment:

- (i) identifies potential impacts on biological diversity;
- (ii) demonstrates that all timber extraction will be conducted according to an environmentally sound management system which maintains the ecological functions of the natural forest and minimizes impacts on biological diversity; and
- (iii) demonstrates that the activity will contribute to reducing deforestation.

3.0 Agency Actions: Guidance to Field Missions

Important USAID responses to congressional interest in the environment include the development of several key policy, planning, and strategy papers. These include an environmental and natural resource policy determination and an environmental strategy paper, both issued in 1983, and a forestry strategy paper issued the following year. More recently, the agency has published a policy paper on *Environment and Natural Resources* (USAID 1988a), an *Environment Strategy* (USAID 1992a), and *Strategies for Sustainable Development* (USAID 1994b), as well as operational directives such as the series of guidance cables dispatched to field missions and regional offices.

USAID's policy and strategy documents produced subsequent to the 1986 amendments to the Foreign Assistance Act clearly place tropical forestry and biological diversity at the center of USAID's environmental programming. As an illustration, *Environment and Natural Resources* (USAID 1988a) and the *Environment Strategy* (USAID 1992a) emphasize the need to protect biological diversity and tropical forests. The most relevant statement of USAID's approach to development (and the one that now governs missions' approaches to the environment) is the most recent, namely *Strategies for Sustainable Development* (USAID 1994b).

3.1 Strategies for Sustainable Development

Strategies for Sustainable Development reflect a significant accompaniment to USAID's current reorganization process and represents a fundamental evolution of USAID's operational methods toward an emphasis on partnerships and the use of integrated approaches to promote development. The document provides explicit treatment of the environment as one of four major areas of agency interest in the post-Cold-War era, together with Building Democracy, Stabilizing World Population Growth, Encouraging Broad-Based Economic Growth, and Providing Humanitarian Assistance.

The new operational methods parallel closely, and thus support the major features of Sections 118 and 119 with reference to mandates for:

- Significant local participation in the full development process, from conception to implementation;
- The promotion of partnerships between donors, host-country governments, and NGOs in order to create ownership of the development process; and
- The use of integrated approaches to development, implying mission strategies that take local development problems into account and focus mission efforts on those areas where USAID offers the host country a comparative advantage in the provision of development assistance.

The programs and methods described for protecting the environment have committed USAID to two strategic goals--the conservation of biological diversity and global climate change, thus re-emphasizing two of the priorities included in USAID's 1992 *Environment Strategy*. Accordingly, the 1994 document further commits missions to the assessment of particular issues as components of country strategies, including improved agricultural practices, strengthening public policies and institutions, promoting

multilateral dialogue, and supporting environmental research and education. This direct link between *Strategies for Sustainable Development*, with their emphasis on biological diversity, and the country strategy planning process will directly promote missions' compliance with Sections 118 and 119.

In addition to the comprehensive statement of goals and objectives that *Strategies for Sustainable Development* provide, USAID has also produced draft guidelines (see Appendix B) for implementing the environmental portion of the document (USAID 1994c). Based on these guidelines, USAID's three-fold environmental objective is to safeguard the environmental underpinnings of broad-based economic growth, protect the integrity of critical ecosystems, and ameliorate and prevent environmental threats to public health (USAID 1994c).

Missions or regional offices are expected to examine the range of environmental threats and identify corresponding environmental priorities. In selecting environmental priorities, missions or regional offices must demonstrate in their CPSP that a chosen priority contributes substantively to at least one of the three objectives, complements other donor activities, and assures sustainable impacts through domestic policies, priorities, and resource allocations.

If a mission decides it cannot focus on any of the environmental objectives, it must demonstrate clearly that its programs, while focused on other USAID objectives (population, health, nutrition; democracy; and economic growth) also contribute directly to the resolution of an important environmental problem or to the satisfaction of an important environmental need. Missions or regional offices must therefore have up-to-date and accurate environmental assessments in order to make the connections between whatever the priorities are and the impact of proposed actions on the environment.

The draft guidelines associated with *Strategies for Sustainable Development* can be adapted for specific situations within countries, but the following three-step process for addressing environmental concerns is suggested:

1. Assess the severity of environmental problems,
2. Evaluate the effectiveness of appropriate environmental management strategies, and
3. Identify the best opportunities for sustainable impact (USAID 1994c).

3.2 Plan for Supporting Natural Resources Management in sub-Saharan Africa

With regard to planning, the Bureau for Africa first published a *Plan for Supporting Natural Resources Management in sub-Saharan Africa* in 1987 (USAID 1987) in response to Sections 118 and 119 and the establishment of DFA. The 1987 document listed the causes of environmental degradation in Africa as poverty, population growth, and economic stagnation. These factors were still prominent when the Bureau for Africa issued an updated *Plan* (USAID 1992c). The bureau's approach to addressing these problems in Africa had changed somewhat in the interim, focusing programs on the two areas where USAID could realize the greatest development impact based on its expertise, experience, and limited resources, i.e., sustainable agriculture, tropical forestry, and biological diversity.

The updated plan is useful for the preparation of assessments of tropical forests and biological diversity due to guidance on the identification of broad problem areas, subregions and ecosystems, and program selection. The plan states that natural resources management should be part of an overall African development strategy and, to some extent, contained in all mission programs. The extent of the environmental problems, the array of ecosystems, and the mix of responses all provide ample opportunity for programming. The plan instructs missions to conduct policy dialogue, build institutional capacity, compile baseline data, promote local participation, support private voluntary organizations (PVOs) and NGOs (including the Peace Corps), develop capacity in regard to geographic information systems, study links between development and environment, and integrate natural resources management issues into development projects.

The plan outlines several key considerations for program strategy related to natural resources management, which are also the generic principles of USAID's assistance and thus relevant to the preparation of assessments of tropical forests and biological diversity:

1. *Concentration.* USAID's experience is predominantly in the areas of soil and vegetation management and, to a lesser extent, water resources and biological systems management.
2. *Integration.* Sustainable natural resources management must be integrated into all programs, including agriculture, rural development, and policy dialogue.
3. *Long-term commitment.* A framework of long-term country program strategies in natural resource management must be developed.
4. *Financing recurrent costs.* African countries need to address the issues of recurrent costs in order for natural resource management programs to be sustainable; USAID should assist in these efforts.
5. *Donor cooperation and coordination.* USAID provides 15 to 20 percent of the total donor assistance to Africa and therefore must work with other donors, both within countries and regionally, on issues related to the management of natural resources.
6. *Local involvement.* One of the greatest lessons learned in natural resource management over past years has been the importance of local participation and the failures of top-down approaches. Farmers, herders, and other stakeholders, including women, must introduce, adopt, and adhere to new and different ways of dealing with, harvesting, using, and managing their resources.
7. *Women in development.* USAID will continue to emphasize the inclusion of women in its programming, particularly in the African context where women supply more than half of the labor for agricultural production and are often primary managers of natural resources.

3.3 Development Fund for Africa

The Bureau for Africa developed an action plan for the DFA in 1989 (USAID 1989), and it pledges specific funding for the conservation of biological diversity. The Bureau for Africa has responded to the DFA's objectives of broad-based sustainable economic growth and linked these responses to the bureau's own objectives of sustainable agriculture and protection of tropical forests and biological diversity. The shift in USAID's approach to development assistance, from treating symptoms to identifying causes of

symptoms, is a result of the DFA's mandates and the realization that sustainable economic development can be accomplished only by enabling beneficiaries to help themselves and by tackling the serious challenges of policy reform. These challenges and those associated with improving the management of Africa's natural resources via the DFA are discussed in *Towards a Sustainable Future* (USAID 1993a).

3.4 USAID Guidance Cables for Strategic Planning

Adaptation of policy and planning strategies for the conservation of tropical forests and biological diversity obligates USAID to provide guidelines to missions for use in preparing their CPSPs or concept documents. Accordingly, a cable on "Guidance for Preparation of Background Assessments of Biological Diversity and Tropical Forests for Use in CDSSs or Other Country Plans" (U.S. Department of State 032584; see Appendix A) was sent to all USAID missions and regional offices in February 1988. The cable provides an outline and a sample scope of work for conducting the background assessments for a CDSS.

In August 1992, another cable (U.S. Department of State 279542) was sent to USAID missions and regional offices in sub-Saharan Africa to clarify the documentation requirements and review schedules for the CPSP and USAID/Washington (USAID/W) reviews. The cable, which is also in Appendix A, does not refer to Sections 118 and 119, but country categories were introduced to clarify which missions must submit CPSPs as opposed to concept papers. Countries were placed into categories for Sustainable Development (core/focus, watch, special), Rapid Response/Humanitarian, Small Country Programs (i.e., operated from Washington), and Close-Out Programs (see Table 1). The distinction among country categories and strategic plan requirements is important for the allocation of USAID's resources but not necessarily for compliance with Section 118 and 119. However meritorious or compelling the case may be to excuse some missions or offices from the obligation to complete assessments of tropical forests and biological diversity, the Foreign Assistance Act does not make such a distinction. *The act imposes the same requirements on all USAID missions in developing countries regardless of their relative status or categorization.* In other words, missions submitting a concept paper must still adhere to CPSP guidance and implied requirements for assessments of biological diversity and tropical forests.

Table 1. Categorization of Bureau for Africa Assistance Programs (as of mid-1994)

Sustainable Development Countries			Rapid Response/ Humanitarian	Small Country Programs (Managed from USAID/W)	Close-out Programs ^b
Core/Focus	Watch ^a	Special			
Benin Burundi Gambia Ghana Guinea Bissau Madagascar Malawi Mali Mozambique Namibia Niger Senegal Swaziland Tanzania Uganda Zambia Zimbabwe	Guinea Kenya	Eritrea Ethiopia Nigeria South Africa	Angola Liberia Rwanda Somalia Sudan Zaire	Central African Republic Comoros Congo Equatorial Guinea Sao Tomé and Príncipe Sierra Leone	Botswana Burkina Faso Cameroon Cape Verde Chad Côte d'Ivoire Lesotho Togo Zaire

^a An interim status of limited duration (i.e., three years) intended to provide time for careful evaluation of needed change in a country's long-term status.

^b Existing programs will continue to planned termination dates, and no new program actions will be implemented.
Source: M. Adams-Matson, personal communication, 1994.

3.5 Bureau Guidance on Sections 118 and 119

3.5.1 Bureau for Latin America and the Caribbean

The Bureau for Latin America and the Caribbean sent a guidance cable to its missions in April 1992, regarding Sections 118 and 119.³ The cable requested that missions update their assessments of tropical forests and biological diversity. The cable provided background information and an outline for the assessments. Other than this cable, the bureau has not done anything specifically related to

³ Only a draft of this cable was available for this report; thus a cable number could not be obtained.

Sections 118 and 119.⁴ More comprehensive assessment of the implications of Sections 118 and 119 for Latin America and the Caribbean was beyond the scope of the current effort.

With respect to general actions on tropical forests and biological diversity that may provide guidance for addressing Section 118 and 119 during strategic planning, the bureau published *Green Guidance for Latin America and the Caribbean: Integrating Environmental Concerns in USAID Programming* (USAID 1993b). The document is intended to complement the bureau's regional environmental strategy, *Environmental and Economic Development: A Strategy for Latin America and the Caribbean, 1991-2000* (approved in May 1992) and support the implementation of USAID's environment strategy. *Green Guidance* does not mention Sections 118 and 119, but it does present a matrix that summarizes issues, causes, principles, and actions, includes a section on natural resource systems (forests, watersheds, and biological diversity), and aims to provide information to assist with USAID's programming in Latin America and the Caribbean.

3.5.2 The Bureau for Africa

The Bureau for Africa has not yet issued specific guidance, either via a cable or publication, related to Sections 118 and 119. The bureau has been active in tropical forestry and biological diversity as evidenced by the many publications and projects ongoing in these areas. Nonetheless, USAID's missions in sub-Saharan Africa need more current and specific guidance beyond the 1988 cable and the current draft *Guidelines for Strategic Plans* (USAID 1994c) if they are to include useful analyses of tropical forests and biological diversity in their CPSPs. The 1988 CDSS guidance cable is outdated in light of the current focus on the new CPSP approach and the broad adaptation of the process at the present time. The introduction of country categories and changes in the review process and scheduling may also have been subject to varying interpretation in terms of compliance with Sections 118 and 119, a situation that could be clarified by an updated cable specifically addressing mission obligations as a result of *Strategies for Sustainable Development*.

Such guidance is also desirable because the draft guidelines (USAID 1994c) associated with the implementation of these strategies do not present the legislative requirements associated with Sections 118 and 119 in sufficient clarity to assure unequivocal interpretation by the missions regarding their obligations to prepare assessments of tropical forests and biological diversity. Detailed guidance is provided to support the candidacy of environment as a country strategy area (see Appendix B), but no direct reference is made to each mission's obligation to prepare the required assessments regardless of the importance of these issues in the individual country.

The Bureau for Africa intends to send guidance to the field on the development and review of CPSPs that will also address the legislative requirements of Sections 118 and 119.⁵ At the time

⁴ J. Hester, Agency Environmental Coordinator, personal communication, 1994.

⁵ M. Adams-Matson, Senior Program Planning Analyst, Bureau for Africa, Office of Development Planning, personal communication, 1994.

of this report's completion, the agency is still reviewing the draft strategic guidelines (USAID 1994c), so the Bureau for Africa is waiting for approval of these guidelines before preparing additional guidance covering Sections 118 and 119.

3.6 Other Pertinent Guidance: Environmental Assessment

To comply with the congressional mandate that USAID consider the environmental consequences of its development activities, the agency developed environmental procedures, which are codified in 22 *Code of Federal Regulations* 216 (i.e., Part 216 of Chapter 22 of the *Code*).⁶ The procedures are applicable to all USAID activities and require the identification of potential environmental effects of proposed development strategies and projects and the adoption of appropriate environmental safeguards (see Appendix C). Depending on the project and its possible environmental effects, the procedures require initial environmental examinations, environmental assessments, or environmental impact statements. The first is the most common; the last is required only for activities that have the potential to affect the United States, the global environment, or areas outside the jurisdiction of any nation. Siew (1988) provides an excellent summary of the operations and implementation of USAID's environmental procedures.

⁶ The *Code of Federal Regulations* serves as a compilation of current government regulations, decisions, and actions. As an example, the environmental procedures of other federal agencies can also be found in the *Code*, which is arranged by subject, such as transportation or wildlife.

4.0 Mission Response to Agency Guidance: Assessments of Tropical Forests and Biological Diversity

4.1 Factors Underlying the Variability of Mission Responses

Missions and regional offices vary widely in their need for and approach to assessments of tropical forests and biological diversity. Some missions have prepared minimal responses whereas other missions have based their programs on strategic environmental issues. Missions can fund assessments of tropical forests and biological diversity from their own resources and have obtained technical assistance from such projects as USAID's Environmental and Natural Resources Policy and Training Project (EPAT), the Policy Analysis, Research, and Technical Support Project (PARTS), and the Biological Diversity Support Project. Natural resource management assessments and action plans were prepared for a number of countries in the late 1980s through the Bureau for Africa's Natural Resources Management Support Project.

Other bilateral and multilateral donors are increasingly involved in environmental activities as well, especially through the National Environmental Action Plan (NEAP) process, and are conducting their own assessments. With primary support and initiative provided by the World Bank and USAID, the interest and involvement of bilateral donors in NEAPs to date is most notable from Denmark, The Netherlands, and United Kingdom (WRI 1990; WRI, IIED, IUCN 1993).

Many of the early assessments, whether done by USAID or others, significantly increase the knowledge base regarding a given country's environmental situation, highlight major environmental issues, and identify information gaps. Though useful, these analyses have not always met the information needs of missions preparing strategic plans. In the late 1980s, there was a shift in the kind of environmental studies being prepared, from gathering existing data and raising awareness of environmental problems to more analytical assessments and sector studies on tropical forests and biological diversity.

Finally, and as previously mentioned, USAID has adopted the CPSP as a mechanism for defining strategic priorities. The multiyear plans, covering five to eight years, are expected of every mission and regional office, with the goal of achieving sustainable development. Using USAID's suggested key indicators (USAID 1994c), each mission or regional office must assess opportunities for sustainable development, identify constraints to those opportunities, and determine how USAID will address the identified problems.

Analysis is required to support a mission's decision to focus on particular sectors or issues. Key factors in the environment, such as quantifiable losses in gross domestic product of 5 percent or more due to natural resource depletion, a measurable and rapid rate of degradation of key ecosystems (forests, wetlands, coral reefs, savannahs), or unacceptable health risks would suggest that a country include environment as one of its strategic objectives.

Other key factors that need to be considered include economic, ecological, and public health significance of intact resources; public health and ecological implications of trends of urbanization; industrial development and population/demographic changes; and strengthening environmental policies and programs by local partners, governmental and nongovernmental.

Response at the implementation level to congressional and agency interest in tropical forestry and biological diversity must therefore be measured across a range of operational activities within missions, including integration of the issues into the new CPSP process, analysis of the subjects via focused assessment documents, and review of related issues in response to statutory requirements for environmental assessment of project activities.

4.2 The Adequacy of Completed Assessments of Biological Diversity and Tropical Forests

Many USAID missions in sub-Saharan Africa have completed assessments of tropical forestry and biological diversity since the addition of Sections 118 and 119 to the Foreign Assistance Act in 1986. Have these assessments met the law's requirements? This is a difficult question to answer in the sense that the law does not specify precise issues that must be addressed. Despite the absence of specific indicators or issues that must be examined, the Congress has made its intentions clear. The Congress wants to ensure that USAID is in a position to proactively contribute to wise environmental management and the protection and preservation of tropical forests and biological diversity. These goals allow the establishment of some minimum information needs. That is, if a mission seeks to meet its statutory obligations related to these issues, what kinds of information must it have to do so?

4.2.1 Minimum Information Requirements

Caveats must be attached to the development of any specification of minimum data needs. For example, the scale (national, regional, or local) at which information is collected can introduce disparities from one assessment to another, since national environmental policies may not be applicable at the local level. Much of the data listed below would also be difficult to collect in a short time span, so some of the data must have already been collected and made available from secondary sources and earlier environmental studies. Furthermore, some missions may not be focusing on the environment due to size of their programs, the perceived urgency of other, nonenvironmental problems, the presence of a comparative advantage (i.e., taking into account other donor involvement in environmental programs).

Moreover, one of the problems with Sections 118 and 119 is that allowances for such variability among missions and programs are not considered. The Congress expressed a universal interest in the protection of tropical forests and biological forests, not only in countries in which the environment is a major component of a mission's portfolio, but in all developing countries in which USAID operates. Consequently, though it may not always be efficient in terms of time, effort, and resources to gather the following minimum information, it is important for assessment teams to work toward a minimum information set that includes the following information:

1. History of environmental issues and actions and the socioeconomic setting, especially as related to agriculture, tropical forestry, and biological diversity;
2. Climate, geography, ecosystems, and natural resource maps of the country (over a period of years if possible);
3. A list of endangered and threatened species, both flora and fauna, if known; a list of economically important species; a list of socially important species. Caution: lists are value-laden and never complete;
4. Information on protected areas and parks, including maps, environmental changes, and local participation;
5. The legislative and policy environment, level of government action and commitment (national versus local), capacity of public institutions to respond to environmental problems, the use of legislation to govern conservation and natural resources use, the presence of a NEAP process;
6. Significant threats to tropical forests and biological diversity--social versus economic, the role of population and demographic changes;
7. Previous and ongoing research in-country on tropical forestry and biological diversity, including economic assessments if available;
8. Programs and actions of PVOs, NGOs, and other donors including extension/education and future needs;
9. USAID's actions and plans; and,
10. Bibliography.

Having identified minimal information requirements, it is now possible to match practice with principle. Have assessments of biological diversity and tropical forestry conducted thus far in sub-Saharan Africa met these minimal needs? To answer this question, 15 assessments completed between 1988 and 1994 were examined. It is important to emphasize that the 15 do not represent all the assessments that were completed, but they do represent the majority and certainly a fair sampling of all that were completed.

The efforts of seven missions that prepared assessments of tropical forests and/or biological diversity from 1988 through 1992 as parts of country environmental profiles were examined to determine whether they contain the minimum information (see Appendix D) (WRI 1990; WRI, IIED, IUCN 1993). In addition, eight other specific assessments of tropical forests and biological diversity (in Benin, Botswana, Cameroon, Ghana, Madagascar, Mali, Mozambique, Niger) conducted between 1988 through 1994 were also examined (see Appendix E). These 15 provide a sample of all assessments conducted, and there is some overlap in dates. The times were chosen as the shift from the use of CDSSs to CPSPs as planning documents was occurring in African missions. This shift is demonstrated in the latter studies, which place environmental issues into a development context. In no case did an assessment have all of the information as outlined in the minimum data set; the assessments for Ghana (Dorm-Adzobu et al. 1991, Annex I to the CPSP), Botswana (USAID 1988b), Mali (Warshall 1989), Cameroon (USAID/Cameroon 1993, Appendix D to concept paper), and

Mozambique (Painter et al. 1994) come closest to providing the minimum information (see Bibliography).⁷

The following examples of assessments of tropical forests or biological diversity are among the second group, i.e., those conducted between 1988 and 1994.

- **Cameroon.** The four-page appendix to the Cameroon Concept Paper (USAID/Cameroon 1993) did not include many of the environmental issues noted above, but the degradation of tropical forests and biological diversity was discussed (including income from exploitation, legislation, parks, value of wildlife and forests to local peoples, lack of research, and endangered areas) as well as that of soils, water and vegetation, and the threats of increased agricultural production on fragile lands (see Appendix F for the complete text of this discussion). Cameroon has no active USAID programs at present (November 1994), so a planning exercise such as a full-fledged assessment of biological diversity would have little immediate utility for USAID. The appendix can therefore be considered sufficient to meet the statutory requirements of Sections 118 and 119 and provides considerable information USAID could utilize if it renews operations in Cameroon.
- **Benin.** In contrast to the situation in Cameroon, the short assessment of Benin's tropical forests and biological diversity (USAID/Benin 1994) does not provide adequate information to the mission to enable a clear link to be established between the topics and USAID's single strategic objective in that country. The assessment noted that other donors are focusing on the environment. Accordingly, the assessment recommends that U.S. action be deferred because other donors are addressing environmental concerns through a NEAP process. USAID has a small, single-sector program in Benin and has only one strategic objective, education, for which the mission determined that a comparative advantage existed in the agency's favor. Thus, while the assessment may be sufficient to enable the mission to respond to reporting requirements, the assessment does not demonstrate how the mission's single strategic objective is being, or could be, linked to environmental concerns.
- **Mali and Botswana.** The assessments of biological diversity for Mali (Warshall 1989) and Botswana (USAID/Botswana 1988) contain comprehensive information on the environment, provide analysis of policy, legislation, and local actions, and serve as models for assessments of biological diversity. Nonetheless, the reports are now outdated. The assessment in Botswana, for example, does not include consideration of the mandates in

⁷ In addition to assessments of tropical forests and biological diversity in conjunction with the development of CPSPs, USAID/Ghana commissioned a series of environmental assessments (including one on primary tropical forestry and the furniture industry) in conjunction with its Trade and Investment Program and USAID/Mali completed a Forestry Sector Environmental Assessment in 1993-1994.

Sections 118 and 119. Although both documents are nominally titled biological diversity assessments, the two reports also contain considerable information on tropical forests. As in the case of Madagascar, Botswana and Mali have long-running USAID projects strongly linked to the environment (i.e., community-based wildlife utilization in Botswana and village reforestation in Mali), thus supporting the observation that, when missions have strong environmental programs, missions refer to project documents to provide information on tropical forests and biological diversity.

- **Ghana.** Ghana's assessment of biological diversity (Dorm-Adzobu et al. 1991), an annex to that country's CPSP, is perhaps the most scientifically coherent. The assessment, which is thorough and scientifically credible, provides excellent material for a researcher. Extensive information is provided on ecosystems, flora, fauna, and biological conservation, but there is little about the policy environment and the roles of both government and donors/NGOs. Thus, the assessment may be weighted too heavily on the biophysical environment to be useful for mission staff who perhaps would benefit from more information on the government's interests and the socioeconomic constraints to improved environmental management, i.e., the institutional and policy environment.
- **Mozambique.** The recent assessment in Mozambique (Painter et al. 1994) includes a treatment of monitoring and information systems, thereby identifying a potentially useful investment area for mission involvement. In Mozambique, the opportunity exists to create information systems efficiently as a result of the absence of such systems because of past conflicts. The section on information and monitoring further identifies data sources and the requirements for establishing information systems. The assessment also includes discussion of marine and coastal conservation issues and is one of the few that refers specifically to Sections 118 and 119. In fact, the mandates and objectives of the two sections governed the organization and conduct of the assessment. Though such reference may not be necessary, it is nonetheless useful for reminding missions of their legal obligations. USAID/Mozambique currently is developing a CPSP and is shifting its focus from relief to recovery. Given the fundamental nature of this shift in emphasis, the assessment should help the mission establish environmental concerns as an integral strategic plan element.

Finally, it should be noted that USAID/W has only recently required missions to link their strategic plans specifically to environmental concerns. Implied critique of assessments that did not link the two areas should be qualified with the observation that the authors may not have been asked to do so. Now that such linkage is a requirement, however, any guidelines or guidance should emphasize both the legislation and the CPSP guidelines on the environment.

4.2.2 Categorizing Missions' Responses to Sections 118 and 119

Full mission compliance is regarded as the appropriate treatment of tropical forests and biological diversity in the development of a country strategic plan, supported by independent analysis targeting the CPSP process. As judged by this criteria, review of the available mission documents demonstrates a continuum that ranges from noncompliant to fully compliant. Though mission responses are as varied as their program portfolios and individual country situations, most can be placed in one of four of the following categories.

1. Fully noncompliant missions that have no written treatment of biological diversity and tropical forests in strategy documents. The reasons include a transitional mission status (e.g., to inactive), the absence of strategic objectives related to the environment (e.g., Guinea and Burundi), or the status of environment as a "target of opportunity."
2. Partially noncompliant missions that refer to tropical forests or biological diversity in minimal terms in strategy documents, perhaps with the observation that other donors' efforts are sufficient (e.g., Benin).
3. Nominally compliant missions that include explicit treatment of the two issues in their strategy documents but which rely on such sources as Project Identification Documents, project papers, or background reports for NEAPs for analysis rather than explicit assessments of biological diversity and tropical forests (e.g., Madagascar, Guinea-Bissau).
4. Fully compliant missions that integrate the two issues into strategic planning and which support the effort with comprehensive assessments of biological diversity and tropical forestry.

In summary, analysis of the documents available for this review indicates that several missions are not in compliance with Sections 118 and 119 by virtue of absent assessments, background studies, or plans that state intentions for their implementation. Furthermore, even those strategic plans composed entirely of environmental objectives may not contain sufficient information specifically addressing tropical forests and biological diversity to be deemed compliant with Sections 118 and 119. Given the legislation's explicit requirement that such information be contained in USAID's country planning documents, reference to project papers and documents without further elaboration is insufficient for the purpose of compliance.

Though such observations can be readily made based on review of literature, individual mission intentions with regard to compliance with Sections 118 and 119 are more difficult to discern. Missions with no environmentally related strategic objectives or targets of opportunity demonstrate an apparent belief in exemption from compliance with the legislation, though the recent draft *Guidelines for Strategic Plans* (USAID 1994c) should clarify the situation. In some cases, clear guidelines for preparation of adequate responses would facilitate compliance. In other cases, guidance plus additional advice from the Bureau for Africa may be desirable.

Tying the preparation of assessments of tropical forests and biological diversity to the country review schedule is one ready means of assuring appropriate responses from missions. A cable

containing concise assessment guidelines, copies of the relevant portions of the legislation (see Section 2.1 and Appendix A), and approved CPSP guidelines would link the legislative requirement directly to a mission's need for action and would focus mission attention on compliance.

5.0 Guidance to Teams and Missions in the Preparation of Assessments of Tropical Forest and Biological Diversity

This section of the report discusses the rationale for assessments of tropical forests and biological diversity, provides a decision-tree framework that an assessment team can use for gathering and analyzing data, suggests bibliographic and contact sources, and describes the nature of any recommendations to be written for proposed action for inclusion in a CPSP. Section 4.2 discussed the concept of minimum information requirements that teams can use for data gathering.

5.1 Guidelines for Missions

A generic scope of work for an assessment of tropical forestry and biological diversity is found in Appendix G. The purpose of an assessment of tropical forestry and biological diversity is:

- To provide a mission with a concise evaluation of the status of biological diversity and tropical forests,
- To focus on management issues and required actions for conservation, and
- To identify the extent to which these required actions are satisfied by current or proposed mission programs.

The assessment is a tool to facilitate a mission's planning and decision making, so it should therefore define specific program options in terms of their probable effects on those biological diversity and tropical forestry issues that the assessment team identifies. At the same time, the assessment is an educational tool that informs the mission staff of present trends and recent advances in the scientific study of tropical forests, biological diversity, and their management.

The tropical forestry and biological diversity assessment is a necessary component of the CPSP and concept paper. Planning for the assessment should be done well in advance of the due date for the CPSP or concept paper. An effective way to conduct the assessment is to collect the relevant background information and reports from their disparate sources and make them available to the assessment team as soon it begins its work. Whether a mission chooses to use its own expertise or to hire local consultant(s) to gather the background information, considerable efficiency will be realized if the information is collected for the team well beforehand. Further, a list of local persons and institutions working on environmental issues should also be compiled if expatriate experts are asked to conduct the assessment.

Assessments of tropical forests and biological diversity are ideally scheduled at least a year in advance of the CPSP's due date so that the assessment can be used in the planning process. Whether the environment will be included as a strategic objective of the mission may well be decided once the assessment is completed. The availability of previous assessments and the likelihood of the environment being a strategic objective will, of course, determine the best timing for the assessment.

Although the assessment of tropical forests and biological diversity is prepared for the mission and thus written in English, it is useful for the assessment team to have some (or considerable) fluency in the local language. In particular, if much of the work of USAID is conducted in a language other than English and the mission relies heavily on local technical assistance, speaking the common language facilitates gaining access to information, conducting interviews, and analyzing the data. If that is not possible, a local expert in one of the areas needed for the team (see Appendix G for a generic scope of work) should be hired. In any case, local expertise should be used if at all possible and, if a mission feels comfortable doing so, then a local team can complete the entire assessment.⁸ As an illustration, a local team completed the assessment of Ghana's tropical forests and biological diversity (Dorm-Adzobu et al., 1991), and the report represents one of the best examples of such an assessment written in the last six years.

5.2 Cautionary Considerations

As noted in Section 4.0, a review of assessments of tropical forests and biological diversity conducted for USAID since 1988 reflects a broad and inconsistent interpretation of Sections 118 and 119. The assessment documents range from 2 to 100 pages and with minimal to substantial linkage to country program strategies. Reviews of evaluations of projects meant to support the missions and regional offices in conducting assessments and interviews with teams just completing assessments have identified several factors that can inhibit teams' best efforts. In some instances:

1. a mission seemingly regards the required assessment as a simple statutory requirement with little relevance to country strategies.
2. missions have ranked environment as a top priority, there is more than one major environmental project, and several of the mission's employees are natural resource management professionals.
3. a mission's employees have either not considered environment as a strategic objective, how to make the environmental connection to a mission's strategic plans, or have assumed that other donors will address the environmental problems.

Other factors can also hamper an assessment team's ability to function; these relate to acquiring and accessing relevant information, both in the United States and in the host country. An ideal team would have at least one local counterpart. In addition, USAID/W and the mission would provide background documentation, and team members would have country experience and speak the local language, where relevant. At a minimum, the mission would provide a local counterpart to assist with accessing written information and contacting persons and agencies with whom the team should interact. The assessment team should have as much information as possible as soon as the assessment begins. This is often not possible, and the assessment team must be prepared to spend considerable time accessing such information once the members of the team arrive in the country.

⁸ Reliance on local expertise has obvious advantages in terms of costs but the potential disadvantage of inexperience in meeting the requirements of Sections 118 and 119 and an inability to meet with USAID staff in the Bureau for Africa before the assessment begins.

The third set of factors affecting a team's ability to conduct an assessment entails a reasonable scope of work, an understanding of the enabling legislation and reporting requirements, a tentative outline, and examples of previous assessments. The assessment team is usually composed of scientists with expertise in tropical forestry and biological diversity, yet the team is also expected to use its scientific expertise to provide information, above and beyond the scientific assessments, to the mission for use in management and planning. For this reason, a expertise in natural resources law, policy, and institutions is highly desirable.

Finally, many of these concerns can be addressed in a team planning meeting that occurs at the beginning of an assessment. If expatriate expertise is used for the assessment, then such a meeting can be scheduled in Washington, D.C. The team would then have access to the Bureau for Africa's environmental staff, USAID's country desk officer, and country experts from the World Bank, who can usually provide considerable relevant information to a team. The team can also use the planning meeting to allocate roles and responsibilities and to develop a tentative outline of the completed report.

5.3 Guidelines for Teams

5.3.1 Content

The Department of State's 1988 cable (032584) provided a suggested outline to be used for assessments of tropical forests and biological diversity. If the outline is followed, the completed report can provide USAID/W and the mission with a concise evaluation of the status of biological diversity and tropical forests that also focuses on management issues and required actions for conservation. The assessment should also identify the extent to which current or proposed mission programs and projects satisfy these required actions for conservation. The outline (Appendix A) is suggested, but it is flexible and modifiable in response to specific country situations.

5.3.2 Decision Tree

The following questions can assist an assessment team in meeting both the requirements of Sections 118 and 119 and of the CPSP or concept paper. The questions are illustrative only, and the format is not obligatory but does seek to highlight important points that should be included in an assessment.

1. What is/are the mission's strategic objectives?
 - a.
 - b.
 - c.

2. Is the environment one of the strategic objectives?

If no, the mission is still required to ensure that its programs and projects are environmentally sound. Further, as stated in the *Guidelines for Strategic Plans* (USAID 1994c):

...if a mission concludes that it cannot with its limited resources focus on any environmental need in and of itself, that mission should demonstrate that its program, while focused on one or more of the other three focal areas (population, health, nutrition, democracy, economic growth) also contributes directly to resolution of an important environmental problem or satisfaction of an important environmental need.

Go to 3.

If yes, list that strategic objective and **go to 4.**

3. In order to meet the requirements of Sections 118 and 119 related to what actions other governments or organizations are taking in the host country, the following minimum information on the status of tropical forests and biological diversity is necessary for the mission:

Host country actions in regard to tropical forests and biological diversity
PVO and NGO community actions
Other bilateral and multilateral donor actions
Is a NEAP process ongoing, and how effective is it? Who are the key donors?

4. Within the strategic objective for the environment, are there mechanisms to ensure the appropriate management of tropical forests?

If no, explain why not.

If yes, describe how it is being addressed, and what the mission's action plans and targets of opportunity are. **Go to 6.**

5. Within the strategic objective for the environment, are there mechanisms to ensure the appropriate management of biological diversity?

If no, explain why not.

If yes, describe how it is being addressed, and what the action plans and targets of opportunity are. **Go to 7.**

6. If applicable, what are the issues, problems, and threats to tropical forests and at what scale are they (national, regional, or local)?

Deforestation: conversion to other use, unsustainable use, overexploitation

Unsustainable use of wood for energy production (measurable)
Overexploitation of timber products (measurable and perceived)
Soil erosion
Declines in fuelwood availability
Loss of biological diversity
Changes in climate patterns
Watershed degradation
Ineffective policy environment for environmental and economic sustainability
Local participation, including women, in decision making
Education programs, formal and informal
Land tenure, tree tenure
Population growth and demographic shifts

7. Are the following considerations relevant to biological diversity being addressed and at what scale (national, regional, local)?

Presence of protected areas and parks
Biological diversity and plants: genetic, species, ecosystem, biome level
Biological diversity and animals: genetic, species, ecosystem, biome level
Loss of biological diversity, including domestic species
Loss of cultural diversity
Loss of genetic resources
Unsustainable land-use practices
Population growth and demographic changes
Ineffective policy environment for biological diversity conservation and sustainability
Land tenure
Local participation, including women, in decision-making
Education programs, formal and informal

5.4 Suggestions for Improvements

5.4.1 Guidance from the Bureau for Africa

The Bureau for Africa should take several steps immediately in order to alert missions to the importance of following the legislative requirements for completion of assessments of tropical forests and biological diversity. The Bureau for Africa should provide the missions with guidelines so that the missions are able to complete the assessments. The following are suggestions for improvements:

As noted earlier, the Bureau for Africa has not sent a guidance cable or developed guidelines for missions to follow. A guidance cable is needed. USAID/W staff have noted that the bureau is waiting for the draft *Guidelines for Strategic Plans* (USAID 1994c) to be approved, at which point the bureau is likely to send guidance on both CPSPs and Sections 118 and 119.

5.4.2 Putting Missions on Notice

By providing guidance in the form of a cable and guidelines as outlined in this report, the Bureau for Africa can contribute to considerable improvement and consistency in assessments of tropical forests and biological diversity that are conducted. Further, a cable would inform missions that they must conduct such an assessment regardless of presumed exemption by virtue of program category. As noted, few of the assessments reviewed meet the criteria of a minimum data set that would be useful for strategic planning.

5.4.3 Specific Guidance on Tropical Forestry and Biological Diversity Strategies

More specific information and guidance is needed on tropical forestry and biological diversity strategies for the bureau writ large. As Webster (1994) observes, the Bureau for Africa would benefit from a revision of its strategy on biological diversity, and its *Plan for Supporting Natural Resources Management in sub-Saharan Africa* (USAID 1992c) needs to be updated to reflect changes in the bureau's system for prioritizing country-level programming and to reflect other changes on the agency's approach to environmental issues (e.g., *Strategies for Sustainable Development*).

Webster is not the only observer seeking specific guidance and definitions. For example, Bayle, Howlett, and Toth (1992) prepared a report addressing the need to strengthen USAID's compliance with federal regulations. The authors stressed the legal rationale for providing guidance through the use of programmatic environmental assessments.

Moreover, the bureau apparently has some latitude in providing guidance to missions, as shown by the supplemental guidelines on climate change (USAID/Bureau for Africa, 1993c), to address both the bureau's specific interests and focus. As stated in the Bureau for Policy and Program Coordination directive (USAID 1994d) regarding bureau-level strategy statements, bureaus can issue strategy statements to establish program priorities specifically directed to the portfolios under their management authority. Such statements provide progressively greater focus to the strategic choices, can delimit how specific problems should be addressed, or can offer a menu of program priorities.

5.4.4 Preparing the Assessment Team

Interviews with consultants and USAID staff who have participated in assessments of tropical forests and biological diversity indicate that teams occasionally receive conflicting information and direction from the Bureau for Africa and the relevant mission. Teams can also receive insufficient information prior to departure. Ample time in Washington, D.C. for interviews of bureau and NGO staff, as well as additional time in-country for similar preparation, would mitigate these concerns. Team-building exercises are potentially useful, but it should be assumed that the team members are professionals and probably desire as much technical information as possible. Scopes of work should take great care to match travel and delivery schedules with levels of effort. Expectations for the gathering of any baseline information should receive special attention, since the collection of original

field data will require prohibitive amounts of time in all but the rarest of circumstances. Scopes of work should be amended only with the full concurrence of USAID/W and the mission.

As previously mentioned, assessment teams would benefit from guidelines that are specifically directed to the preparation of assessments of tropical forests and biological diversity in response to Sections 118 and 119 and CPSP guidelines.

6.0 Relevant Readings

Legislation and cables (see Appendix A)

Sections 118 and 119, Foreign Assistance Act

Cable 032584, February 1988

Cable 279542, August 1992

The following references are available through USAID's Reference Department. These documents can be obtained in paper or microfiche format. To request a copy of these documents, interested readers can contact:

USAID Reference Department
U.S. Agency for International Development
Room 105, SA-18
Washington, DC 20523-1801

Telephone: (703) 875-4818

Facsimile: (703) 875-5269

USAID. 1992c. *Plan for Supporting Natural Resources Management in Sub-Saharan Africa: Regional Environmental Strategy for the Africa Bureau*. USAID: Washington, D.C.

_____. 1993. *Towards a Sustainable Future for Africa: Improved Natural Resources Management under the Development Fund for Africa, 1987 to 1993*. USAID: Washington, D.C.

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Country CDSS or CPSP, project papers, earlier assessments, and country environmental profiles as appropriate for each mission or regional office.

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Appendix A: Relevant Legislation and Cables

Appendix B: Guidelines for Strategic Plans, 1994, Draft # 9

Appendix C: USAID's Environmental Procedures (22 CFR Part 216)

§ 216.1 Introduction

(a) Purpose. In accordance with sections 118(b) and 621 of the Foreign Assistance Act of 1961, amended, (the FAA) the following general procedures shall be used by A.I.D. to ensure that environmental factors and values are integrated into the A.I.D. decision making process. These procedures also assign responsibility within the Agency for assessing the environmental effects of A.I.D.'s actions. These procedures are consistent with Executive Order 12114, issued January 4, 1979, entitled Environmental Effects Abroad of Major Federal Actions, and the purposes of the National Environmental Policy Act of 1970, as amended (42 U.S.C. 4371 et seq.) (NEPA). They are intended to implement the requirements of NEPA as they effect the A.I.D. program.

(b) Environmental Policy. In the conduct of its mandate to help upgrade the quality of life of the poor in developing countries, A.I.D. conducts a broad range of activities. These activities address such basis problems as hunger, malnutrition, overpopulation, disease, disaster, deterioration of the environment and the natural resources base, illiteracy as well as the lack of adequate housing and transportation. Pursuant to the F.A.A., A.I.D. provides development assistance in the form of technical advisory services, research, training, construction and commodity support. In addition, A.I.D. conducts programs under the Agricultural Trade Development and Assistance Act of 1954 (Pub. L. 480) that are designed to combat hunger, malnutrition and to facilitate economic development assistance programs are carried out under the foreign policy guidance of the Secretary of State and in cooperation with the governments of sovereign states. Within this framework, it is A.I.D. policy to:

- (1) Ensure that the environmental consequences of A.I.D.-financed activities are identified and considered by A.I.D. and the host country prior to a final decision to proceed and that appropriate environmental safeguards are adopted;
- (2) Assist developing countries to strengthen their capabilities to appreciate and effectively evaluate the potential environmental effects of proposed development strategies and projects, and to select, implement and manage effective environmental programs;
- (3) Identify impacts resulting from A.I.D.'s actions upon the environment, including those aspects of the biosphere which are the common and cultural heritage of all mankind; and
- (4) Define environmental limiting factors that constrain development and identify and carry out activities that assist in restoring the renewable resource base on which sustained development depends.

(c) Definitions.

(1) CEQ Regulations.

Regulations promulgated by the President's Council on Environmental Quality (CEQ) (Federal Register, Volume 43, Number 230, November 29, 1978) under the authority of NEPA and Executive Order 11514, entitled Protection and Enhancement of Environmental Quality (March 5, 1970) as amended by Executive Order 11991) May 24, 1977).

(2) Initial Environmental Examination. An Initial Environmental Examination is the first review of the reasonably foreseeable effects of a proposed action on the environment. Its function is to provide a brief statement of the factual basis for a Threshold Decision as to whether an Environmental Assessment or an Environmental Impact Statement will be required.

(3) Threshold Decision. A formal Agency decision which determines, based on an Initial Environmental Examination, whether a proposed Agency action is a major action significantly affecting the environment.

(4) Environmental Assessment.

A detailed study of the reasonably foreseeable significant effects, both beneficial and adverse, of a proposed action on the environment of a foreign country or countries.

(5) Environmental Impact Statement.

A detailed study of the reasonably foreseeable environmental impacts, both positive and negative, of a proposed A.I.D. action and its reasonable alternatives on the United States, the global environment or areas outside the jurisdiction of any nation as described in § 216.7 of these procedures. It is a specific document having a definite format and content as provided in NEPA and the CEQ Regulations. The required form and content of an Environmental Impact Statement is further described in § 216.7 infra.

(6) Project Identification Document (PID). An internal A.I.D. document which initially identifies and describes a proposed project.

(7) Program Assistance Initial Proposal (PAIP). An internal A.I.D. document used to initiate and identify proposed non-project assistance, including commodity import programs. It is analogous to the PID.

(8) Project Paper (PP). An internal A.I.D. document which provides a definitive description and appraisal of the project and particularly the plan or implementation.

(9) Program Assistance Approval Document (PAAD). An internal A.I.D. document approving non-project assistance. It is analogous to the PP.

(10) Environment. The term environment, as used in these procedures with respect to effects occurring outside the United States, means the natural and physical environment. With respect to effects occurring within the United States see § 216.7(b).

(11) Significant Effect. With respect to effects on the environment outside the United States, a proposed action has a significant effect on the environment if it does significant harm to the environment.

(12) Minor Donor. For purposes of these procedures, A.I.D. is a minor donor to a multi-donor project when A.I.D. does not control the planning or design of the multi-donor project and either (i) A.I.D.'s total contribution to the project is both less than \$1,000,000 and less than 25 percent of the estimated project cost, or (ii) A.I.D.'s total contribution is more than \$1,000,000 but less than 25 percent of the estimated project cost and the environmental procedures of the donor in control of the planning or design of the project are followed, but only if the A.I.D. Environmental Coordinator determines that such procedures are adequate.

§ 216.2 Applicability of procedures.

(a) Scope. Except as provided in §216.2(b), these procedures apply to all new projects, programs or activities authorized or approved by A.I.D. and to substantive amendments or extensions of ongoing projects, programs, or activities.

(b) Exemptions. (1) Projects, programs or activities involving the following are exempt from these procedures:

- (i) International disaster assistance;
- (ii) Other emergency circumstances; and
- (iii) Circumstances involving exceptional foreign policy sensitivities.

(2) A formal written determination, including a statement of the justification therefore, is required for each project, program or activity for which an exception is made under paragraphs (b) (1) (ii) and (iii) of this section, but is not required for projects, programs or activities under paragraph (b) (1) (i) of this section. The determination shall be made either by the Assistant Administrator having responsibility for the program, project or activity, or by the Administrator, where authority to approve financing has been reserved by the Administrator. The determination shall be made after consultation with CEQ regarding the environmental consequences of the proposed program, project or activity.

(c) Categorical Exclusions.

(1) The following criteria have been applied in determining the classes of actions included in § 216.2(c)(2) for which an Initial Environmental Examination, Environmental Assessment and Environmental Impact Statement generally are not required;

- (i) The action does not have an effect on the natural or physical environment;
- (ii) A.I.D. does not have knowledge of or control over, and the objective of A.I.D. in furnishing assistance does not require, either prior to approval of financing or prior to implementation of specific activities, knowledge of or the specific activities that have an effect on the physical and natural environment for which financing is provided by A.I.D.;
- (iii) Research activities which may have an effect on the physical and natural environment but will not have a significant effect as a result of limited scope, carefully controlled nature and effective monitoring.

(2) The following classes of actions are not subject to the procedures set forth in § 216.3, except to the extent provided herein;

- (i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- (ii) Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored;
- (iii) Analyses, studies, academic or research workshops and meetings;
- (iv) Projects in which A.I.D. is a minor donor to a multidonor project and there is no potential significant effects upon the environment of the United States, areas outside any nation's jurisdiction or endangered or threatened species or their critical habitat.
- (v) Document and information transfers;
- (vi) Contributions to international, regional or national organizations by the United States which are not for the purpose of carrying out a specifically identifiable project or projects;
- (vii) Institution building grants to research and educational institutions in the United States such as those provided for under Section 122(d) and Title XII of Chapter 2 or Part I of the FAA (22 USCA § § 2151 p.(b) 2220s. (1979));

(viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems waster water treatment, etc.);

(ix) Assistance provided under a Commodity Import Program when, prior to approval A.I.D. does not have knowledge of the specific commodities to be financed and when the objective in furnishing such assistance requires neither knowledge, at the time the assistance is authorized, nor control, during implementation, of the commodities or their use in the host country.

(x) Support for intermediate credit institutions when the objective is to assisting the capitalization of the institution or part thereof and when such support does not involve reservation of the right to review and approve individual loans made by the institution;

(xi) Programs of maternal or child feeding conducted under Title II of Pub. I.480;

(xii) Food for development programs conducted by food recipient countries under Title III of Pub. L. 480. when achieving A.I.D.'s objectives in such programs does not require knowledge of or control over the details of the specific activities conducted by the foreign country under such program:

(xiii) Matching, general support and institutional support grants provided to private voluntary organizations (PVOs) to assist in financing programs where A.I.D.'s objective in providing such financing does not require knowledge of or control over the details of the specific activities conducted by the PVO;

(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.); and

(xv) Activities which involve the application of design criteria or standards developed and approved by A.I.D.

(3) The originator of a project, program or activity shall determine the extent to which it is within the classes of actions described in paragraph (c) (2) of this section. This determination shall be made in writing and be submitted with the PID, PAIP or comparable document. This determination, which must include a brief statement supporting application of the exclusion shall be reviewed by the bureau Environmental Officer in the same manner as a Threshold Decision under § 216.3(a)(2) of these procedures. Notwithstanding paragraph (c)(2) of this section, the procedures set forth in § 216.3 shall apply to any project, program or activity included in the classes of actions listed in paragraph (c)(2) of this section, or any aspect or component thereof, if at any time in the design, review or approval of the activity it is determined that the project, program or activity, or aspect or component thereof, if subject to the control of A.I.D. and may have a significant effect on the environment.

(d) Classes of Actions Normally Having a Significant Effect on the Environment. (1) The following classes of actions have been determined generally to have a significant effect on the environment and an Environmental Assessment or Environmental Impact Statement, as appropriate, will be required:

(i) Programs of river basin development

(ii) Irrigation or water management projects, including dams and impoundments;

(iii) Agricultural land leveling;

(iv) Drainage projects;

(v) Large scale agricultural mechanization;

(vi) New lands development;

- (vii) Resettlement projects;
- (viii) Penetration road building or road improvement projects;
- (ix) Powerplants;
- (x) Industrial plants;
- (xi) Portable water and sewerage projects other than those that are small-scale.

(2) An Initial Environmental Examination normally will not be necessary for activities with the classes described in § 216.2(d), except when the originator of the project believes that the project will not have a significant effect on the environment. In such cases, the activity may be subjected to the procedures set forth in § 216.3.

(e) Pesticides. The exemptions of § 216.2(b)(1) and the categorical exclusions of § 216.2(c)(2) are not applicable to assistance for the procurement or use of pesticides.

§ 216.3 Procedures.

(a) General Procedures - (1) Preparation of the Initial Environmental Examination. Except as otherwise provided, an Initial Environmental Examination is not required for activities identified in § 216.2(b)(1), (c) (2), and (d). For all other A.I.D. activities described in § 216.2(a) an Initial Environmental Examination will be prepared by the originator of an action. Except as indicated in this section, it should be prepared with the PID or PAIP. For projects including the procurement or use of pesticides, the procedures set forth in § 216.3(b) will be followed, in addition to the procedures in this paragraph. Activities which cannot be identified in sufficient detail to permit the completion of an Initial Environmental Examination PID or PAIP, shall be described by including with the PID or PAIP: (i) an explanation indicating why the Initial Environmental Examination cannot be completed; (ii) an estimate of the amount of time required to complete the Initial Environmental Examination; and (iii) a recommendation that a Threshold Decision be deferred until the Initial Environmental Examination is completed. The responsible Assistant Administrator will act on the request for deferral concurrently with action on the PID or PAIP and will designate a time for completion of the Initial Environmental Examination. In all instances, except as provided in §216.3(a)(7), this completion date will be in sufficient time to allow for the completion of an Environmental Assessment or Environmental Impact Statement, if required, before a final decision is made to provide A.I.D. funding for the action.

(2) Threshold decision. (i) The Initial Environmental Examination will include a Threshold Decision made by the officer in the originating office who signs the PID or PAIP. If the Initial Environmental Examination is completed prior to or at the same time as the PID or PAIP, the Threshold Decision will be reviewed by the Bureau Environmental Officer concurrently with approval of the PID or PAIP. The Bureau Environmental Officer will either concur in the Threshold Decision or request reconsideration by the officer who made the Threshold Decision, stating the reasons for the request. Differences of opinion between these officers shall be submitted for resolution to the Assistant Administrator at the same time that the PID is submitted for approval.

(ii) An Initial Environmental Examination, completed subsequent to approval of the PID or PAIP, will be forwarded immediately together with the Threshold Determination to the Bureau Environmental Officer for action as described above.

(iii) A Positive Threshold Decision shall result from a finding that the proposed action will have a significant effect on the environment. An Environmental Impact Statement shall be prepared if

required pursuant to § 216.7. If an impact statement is not required, an Environmental Assessment will be prepared in accordance with § 216.6. The cognizant Bureau or Office will record a Negative Determination if the proposed action will not have a significant effect on the environment.

(3) Negative Declaration. The Assistant Administrator, or the Administrator in actions for which the approval of the Administrator, or the Administrator in actions for which the approval of the Administrator is required for the authorization of financing, may make a Negative Declaration in writing, that the Agency will not develop an Environmental Assessment or an Environmental Impact Statement regarding an action found to have a significant effect on the environment when (i) a substantial number of Environmental Assessments or Environmental Impact Statements relating to similar activities have been prepared in the past, if relevant to the proposed action, (ii) the Agency has previously prepared a programmatic Statement or Assessment covering the activity in question which has been considered in the development of such activity, or (iii) the Agency has developed design criteria for such an action which, if applied in the design of the action, will avoid a significant effect on the environment.

(4) Scope of Environmental Assessment or Impact Statement--(i) Procedure and Content. After a Positive Threshold Decision has been made, or a determination is made under the pesticide procedures set forth in § 216.3(b) that an Environmental Assessment or Environmental Impact Statement is required, the originator of the action shall commence the process of identifying the significant issues relating to the proposed action and of the issues to be addressed in the Environmental Assessment or Environmental Impact Statement. The originator of an action within the classes of actions described in §216.2(d) shall commence this scoping process as soon as practicable. Persons having expertise relevant to the environmental aspects of the proposed action shall also participate in this scoping process. (Participants may include but are not limited to representatives of host governments, public and private institutions, the A.I.D. Mission staff and contractors.) This process shall result in a written statement which shall include the following matters:

(a) A determination of the scope and significance of issues to be analyzed in the Environmental Assessment or Impact Statement, including direct and indirect effects of the project on the environment.

(b) Identification and elimination from detailed study of the issues that are not significant or have been covered by earlier environmental review, or approved design considerations, narrowing the discussion of these issues to a brief presentation of why they will not have significant effect on the environment.

(c) A description of (1) the timing of the preparation of environmental analyses, including phasing if appropriate, (2) variations required in the format of the Environmental Assessment, and (3) the tentative planning and decision making schedule; and,

(d) A description of how the analysis will be conducted and the disciplines that will participate in the analysis.

(ii) These written statements shall be reviewed and approved by the Bureau Environmental Officer.

(iii) Circulation of Scoping Statement.

To assist in the preparation of an Environmental Assessment, the Bureau Environmental Office may circulate copies of the written statement, together with a request for written comments, within thirty days, to selected federal agencies if that Officer believes comments by such federal agencies will be useful in the preparation of an Environmental Assessment. Comments received from reviewing

federal agencies will be considered in the preparation of the Environmental Assessment and in the formulation of the design and implementation of the project, and will, together with the scoping statement, will be included in the project file.

(iv) Change in Threshold Decision. If it becomes evident that the action will not have a significant effect on the environment (i.e., will not cause significant harm to the environment), the Positive Threshold Decision may be withdrawn with the concurrence of the Bureau Environmental Officer. In the case of an action included in §216.2(d)(2), the request for withdrawal shall be made to the Bureau Environmental Officer.

(5) Preparation of Environmental Assessments and Environmental Impact Statement. If the PID or PAIP is approved, and the Threshold Decision is positive, or the action is included in § 216.2(d), the originator of the action will be responsible for the preparation of an Environmental Assessment or Environmental Impact Statement as required. Draft Environmental Impact Statements will be circulated for review and comment as part of the review of Project Papers and as outlined further in § 216.7 of those procedures. Except as provided in §216.3(a)(7), final approval of the PP or PAAD and the method of implementation will include consideration of the Environmental Assessment of final Environmental Impact Statement.

(6) Processing and Review Within A.I.D. (i) Initial Environmental Examinations, Environmental Assessments and final Environmental Impact Statements will be processed pursuant to standard A.I.D. procedures for project approval documents. Except as provided in §216.3(a)(7), Environmental Assessments and final Environmental Impact Statements will be reviewed as an integral part of the Project Paper or equivalent document. In addition to these procedures, Environmental Assessments will be reviewed and cleared by the Bureau Environmental Officer. They may also be reviewed by the Agency's Environmental Coordinator who will monitor the Environmental Assessment process.

(ii) When project approval authority is delegated to field posts, Environmental Assessments shall be reviewed and cleared by the Bureau Environmental Officer prior to the approval of such actions.

(iii) Draft and final Environmental Impact Statements will be reviewed and cleared by the Environmental Coordinator and the Office of the General Counsel.

(7) Environmental Review After Authorization of Financing. (i) Environmental review may be performed after authorization of a project program or activity only with respect to subprojects or significant aspects of the project, program or activity that are unidentified at the time of authorization. Environmental review shall be completed prior to authorization for all subprojects and aspects of a project, program or activity that are identified.

(ii) Environmental review should occur at the earliest time in design or implementation at which a meaningful review can be undertaken, but in no event later than when previously unidentified subprojects or aspects of projects, programs or activities are identified and planned. To the extent possible, adequate information to undertake deferred environmental review should be obtained before funds are obligated for unidentified subprojects or aspects of projects, programs or activities (Funds may be obligated for the other aspects for which environmental review has been completed). To avoid irreversible commitment of resources prior to the conclusion of environmental review, the obligation of funds can be made incrementally as subprojects or aspects of projects, programs or activities are identified: or if necessary while planning continues, including environmental review, the

agreement or other document obligating funds may contain appropriate covenants or conditions precedent to disbursement for unidentified subprojects or aspects of projects, programs or activities.

(iii) When environmental review must be deferred beyond the time some of the funds are to be disbursed (e.g. long lead times for the delivery of good or services), the project agreement or other document obligating funds shall contain a covenant or covenants requiring environmental review, including an Environmental Assessment or Environmental Impact Statement, when appropriate, to be completed and taken into account prior to implementation of those subprojects or aspects of the project, program or activity for which environmental review is deferred. Such covenants shall ensure that implementation plans will be modified in accordance with environmental review if the parties decide that modifications are necessary.

(iv) When environmental review will not be completed for an entire project, program or activity prior to authorization, the Initial Environmental Examination and Threshold Decision required under §216.3(a)(1) and (2) shall identify those aspects of the project, program or activity for which environmental review will be completed prior to the time financing is authorized. It shall also include those subprojects or aspects for which environmental review will be deferred, stating the reasons for deferral and the time when environmental review will be completed. Further, it shall state how an irreversible commitment of funds will be avoided until environmental review is completed. The A.I.D. officer responsible for making environmental decisions for such projects, programs or activities shall also be identified (the same officer who has decision making authority for the other aspects of implementation). This deferral shall be reviewed and approved by the officer making the Threshold Decision and the officer who authorizes the project, program or activity. Such approval may be made only after consultation with the Office of General Counsel for the purpose of establishing the manner in which conditions precedent to disbursement or covenants in project and other agreements will avoid an irreversible commitment of resources before environmental review is completed.

(8) Monitoring. To the extent feasible and relevant, projects and programs for which Environmental Impact Statements or Environmental Assessments have been prepared should be designed to include measurement of any changes in environmental quality, positive or negative, during their implementation. This will require recording of baseline data at the start. To the extent that available data permit, originating offices of A.I.D. will formulate systems in collaboration with recipient nations, to monitor such impacts during the life of A.I.D.'s involvement. Monitoring implementation of projects, programs and activities shall take into account environmental impacts to the same extent as other aspects of such projects, programs and activities. If during implementation of any project, program or activity, whether or not an Environmental Assessment or Environmental Impact Statement was originally required, it appears to the Mission Director, or officer responsible for the project, program or activity, that it is having or will have a significant effect on the environment that was not previously studied in an Environmental Assessment or Environmental Impact Statement, the procedures contained in this part shall be followed including, as appropriate, a Threshold Decision, Scoping and an Environmental Assessment or Environmental Impact Statement.

(9) Revisions. If, after a Threshold Decision is made resulting in a Negative Determination, a project is revised or new information becomes available which indicates that a proposed action might be "major" and its effects "significant", the Negative Determination will be reviewed and revised by the cognizant Bureau and an Environmental Assessment or Environmental Impact Statement will be prepared, if appropriate. Environmental Assessments and Environmental Impact Statements will be

amended and processed appropriately if there are major changes in the project or program, or if significant new information becomes available which relates to the impact of the project, program or activity on the environment that was not considered at the time the Environmental Assessment or Environmental Impact Statement was approved. When on-going programs are revised to incorporate a change in scope or nature, determination will be made as to whether such change may have an environmental impact not previously assessed. If so, the procedures outlined in this part will be followed.

(10) Other Approval Documents.

These procedures refer to certain A.I.D documents such as PIDs, PAIPs, PPs and PAADs as the A.I.D. internal instruments for approval of projects, programs or activities. From time to time, certain special procedures, such as those in §216.4, may not require the use of the aforementioned documents. In these situations, these environmental procedures shall apply to those special approval procedures, unless otherwise exempt, at approval times and levels comparable to projects, programs and activities in which the aforementioned documents are use.

(b) Pesticide Procedures--(1) Project Assistance. Except as provided in § 216.3(b)(2), all proposed projects involving assistance for the procurement or use, or both, of pesticides shall be subject to the procedures prescribed in § 216.3(b)(1) (i) through (v) below. These procedures shall also apply, to the extent permitted by agreements entered into by A.I.D. before the effective date of these pesticide procedures, to such projects that have been authorized but for which pesticides have not been procured as of the effective date of these pesticide procedures.

(i) When a project includes assistance for procurement or use, or both of pesticides registered for the same or similar uses by USEPA without restriction, the Initial Environmental Examination for the project shall include a separate section evaluating the economic, social and environmental risks and benefits of the planned pesticide use to determine whether the use may result in significant environmental impact. Factors to be considered in such an evaluation shall include, but not be limited to the following:

- (a) The USEPA registration status of the requested pesticide;
- (b) The basis for selection of the requested pesticide;
- (c) The extent to which the proposed pesticide use is part of an integrated pest management program;
- (d) The proposed method or methods of application, including availability of appropriate application and safety equipment;
- (e) Any acute and long-term toxicological hazards, either human or environmental, associated with the proposed use and measures available to minimize such hazards;
- (f) The effectiveness of the requested pesticide for the proposed use;
- (g) Compatibility of the proposed pesticide with target and non-target ecosystems;
- (h) The conditions under which the pesticide is to be used, including climate, flora, fauna, geography, hydrology, and soils;
- (i) The availability and effectiveness of other pesticides or non-chemical control methods;
- (j) The requesting country's ability to regulate or control the distribution, storage, use and disposal of the requested pesticide;
- (k) The provisions made for training of users and applicators; and,

- (l) The provisions made for monitoring the use and effectiveness of the pesticide.

In those cases where the evaluation of the proposed pesticide use in the Initial Environmental Examination indicates that the use will significantly affect the human environment, the Threshold Decision will include a recommendation for the preparation of an Environmental Assessment or Environmental Impact Statement, as appropriate. In the event a decision is made to approve the planned pesticide use, the Project Paper shall include to the extent practicable, provisions designed to mitigate potential adverse effects of the pesticide. When pesticide evaluation section of the Initial Environmental Examination does not indicate a potentially unreasonable risk arising from the pesticide use, an Environmental Assessment or Environmental Impact Statement shall nevertheless be prepared if the environmental effects of the project otherwise require further assessment.

(ii) When a project includes assistance for the procurement or use, or both, of any pesticide registered for the same or similar uses in the United States but the proposed use is restricted by the USEPA on the basis of user hazard, the procedures set forth in §216.3(b)(1)(i) above will be followed. In addition, the Initial Environmental Examination will include an evaluation of the user hazards associated with the proposed USEPA restricted uses to ensure that the implementation plan which is contained in the Project Paper incorporates provisions for making the recipient government aware of these risks and providing, if necessary, such technical assistance as may be required to mitigate these risks. If the proposed pesticide use is also restricted on a basis other than user hazard, the procedures in § 216.3(b)(1)(iii) shall be followed in lieu of the procedures in this section.

(iii) If the project includes assistance for the procurement or use, or both of:

(a) Any pesticide other than one registered for the same or similar uses by USEPA without restriction or for restricted use on the basis of user hazard: or

(b) Any pesticide for which a notice of rebuttable presumption against registration, notice of intent to cancel, or notice of intent to suspend has been issued by USEPA.

The Threshold Decision will provide for the preparation of an Environmental Assessment or Environmental Impact Statement, as appropriate (§ 216.6(a)). The EA or EIS shall include, but not be limited to, an analysis of the factors identified in §216.3(b)(1)(i) above.

(iv) Notwithstanding the provisions of § 216.3(b)(1) through (iii) above, if the project includes assistance for the procurement or use, or both, of a pesticide against which USEPA has initiated a regulatory action for cause, or for which it has issued a notice of rebuttable presumption against registration, the nature of the action or notice, including the relevant technical and scientific factors will be discussed with the requesting government and considered in the IEE and, if prepared, in the EA or EIS. If USEPA initiates any of the regulatory action above against a pesticide subsequent to its evaluation in an IEE, EA or EIS, the nature of the action will be discussed with the recipient government and considered in an amended IEE or amended EA or EIS, as appropriate.

(v) If the project includes assistance for the procurement or use, or both of pesticides but the specific pesticides to be procured or used cannot be identified at the time the IEE is prepared, the procedures outlined in § 216.3(b) (i) through (iv) will be followed when the specific pesticides are identified and before procurement or use is authorized. Where identification of the pesticides to be procured or used does not occur until after Project Paper approval neither the procurement nor the use of the pesticides shall be undertaken unless approved, in writing, by the Assistant Administrator (or in the

case of projects authorized at the Mission level, the Mission Director) who approved the Project Paper.

* **(2) Exceptions to Pesticide Procedures.** The procedures set forth in § 216.3(b)(1) above shall not apply to the following projects including assistance for the procurement or use, or both of pesticides.

(i) Projects under emergency conditions.

Emergency conditions shall be deemed to exist when it is determined by the Administrator, A.I.D., in writing that:

(a) A pest outbreak has occurred or is imminent; and

(b) Significant health problems (either human or animal) or significant economic problems will occur without the prompt use of the proposed pesticide; and

(c) Insufficient time is available before the pesticide must be used to evaluate the proposed use in accordance with the provisions of this regulation.

(ii) Projects where A.I.D. is a minor donor, as defined in §216.1(c)(12) above, to a multi-donor project.

(iii) Projects including assistance for procurement or use, or both, of pesticides for research or limited field evaluation purposes by or under the supervision of project personnel. In such instances, however, A.I.D. will ensure that the manufacturers of the pesticides provide toxicological and environmental data necessary to safeguard the health of research personnel and the quality of the local environment in which the pesticides will be used. Furthermore, treated crops will not be used for human or animal consumption unless appropriate tolerances have been established by EPA or recommended by FAO/WHO, and the rates and frequency of application, together with the prescribed preharvest intervals, do not result in residues exceeding such tolerances. This prohibition does not apply to the feeding of such crops to animals for research purposes.

(3) Non-Project Assistance. In a very few limited number of circumstances A.I.D. may provide non-project assistance for the procurement and use of pesticides. Assistance in such cases shall be provided if the A.I.D. Administrator determines in writing that (i) emergency conditions, as defined in §216.3(b)(2)(i) above exists; or (ii) that compelling circumstances exist such that failure to provide the proposed assistance would seriously impede the attainment of U.S. foreign policy objectives or the objectives of the foreign assistance program. In the latter case, a decision to provide the assistance will be based to the maximum extent practicable, upon a consideration of the factors set forth in § 216.3(b)(1)(i) and, to the extent available, the history of efficacy and safety covering the past use of the pesticide in the recipient country.

§ 216.4 Private applicants.

Programs, projects or activities for which financing from A.I.D. is sought by private applicants, such as PVOs and educational and research institutions, are subject to these procedures. Except as provided in §216.2(b),(c) or (d), preliminary proposals for financing submitted by private applicants shall be accompanied by an Initial Environmental Examination or adequate information to permit preparation of an Initial Environmental Examination. The Threshold Decision shall be made by the Mission Director for the country to which the proposal relates, if the preliminary proposal is submitted to the A.I.D. Mission, or shall be made by the officer in A.I.D. who approves the preliminary proposal. In either case, the concurrence of the Bureau Environmental Officer is required

in the same manner as in § 216.3(a)(2), except for PVO projects approved in A.I.D. Missions with total life of project costs less than \$500,000. Thereafter, the same procedures set forth in § 216.3 including as appropriate scoping and Environmental Assessments or Environment Impact Statements, shall be applicable to programs, projects or activities submitted by private applicants. The final proposal submitted for financing shall be treated, for purposes of these procedures, as a Project Paper. The Bureau Environmental Officer shall advise private applicants of studies or other information foreseeably required for action by A.I.D.

§ 216.5 Endangered species.

It is A.I.D. policy to conduct its assistance programs in a manner that is sensitive to the protection of endangered or threatened species and their critical habitats. The Initial Environmental Examination for each project, program or activity having an effect on the environment shall specifically determine whether the project, program or activity will have an effect on an endangered or threatened species, or critical habitat. If the proposed project, program or activity will have the effect of jeopardizing an endangered or threatened species or of adversely modifying its critical habitat, the Threshold Decision shall be a Positive Determination and an Environmental Assessment or Environmental Impact Statement completed as appropriate, which shall discuss alternatives or modifications to avoid or mitigate such impact on the species or its habitat.

§ 216.6 Environmental assessments.

(a) General Purpose. The purpose of the Environmental Assessment is to provide Agency and host country decision makers with a full discussion of significant environmental effects of a propose action. It includes alternatives which would avoid or minimize adverse effects or enhance the quality of the environment so that the expected benefits of development objectives can be weighed against any adverse impacts upon the human environmental or irretrievable commitment of resources.

(b) Collaboration with Affected Nation on Preparation. Collaboration in obtaining data, conducting analyses and considering alternatives will help build an awareness of development associated environmental problems in less developed countries as well as assist in building an indigenous institutional capability to deal nationally with such problems. Missions, Bureaus and Offices will collaborate with affected countries to the maximum extent possible, in the development of any Environmental Assessments and consideration of environmental consequences as set forth therein.

(c) Content and Form. The Environmental Assessment shall be based upon the scoping statement and shall address the following elements, as appropriate:

(1) Summary. The summary shall stress the major conclusions, areas of controversy. If any, and the issues to be resolved.

(2) Purpose. The Environmental Assessment shall briefly specify the underlying purpose and need to which the Agency is responding in proposing the alternatives including the proposed action.

(3) Alternatives Including the Proposed Action. This section should present the environmental impacts of the proposal and its alternatives in comparative form, thereby sharpening the issues and providing a clear basis for choice among options by the decision maker. This section should explore and evaluate reasonable alternatives and briefly discuss the reasons for eliminating those alternatives which were not included in the detailed study, devote substantial treatment to each alternatives

considered in detail including the proposed action so that reviewers may evaluate their comparative merits; include the alternative of no action; identify the Agency's preferred alternative or alternatives, if one or more exists; include appropriate mitigation measures not already included in the proposed action or alternatives.

(4) Affected Environment. The Environmental Assessment shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in the Environmental Assessment shall be commensurate with the significance of the impact with important material summarized, consolidated or simply referenced.

(5) Environmental Consequences. This section forms the analytic basis for the comparisons under paragraph(c)(3) of this section. It will include the environmental impacts of the alternatives including the proposed action; any adverse effects that cannot be avoided should the proposed action be implemented; the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity; and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. It should not duplicate discussions in paragraph (c)(3) of this section. This section of the of the Environmental Assessment should include discussion of direct effects and their significance; possible conflicts between the proposed action and land use plans, policies and controls for the areas concerned; energy requirements and conservation potential of various alternatives and mitigation measures; natural or depletable resource requirements and conservation potential of various requirements and mitigation measures; urban quality; historic and cultural resources and the design of the built environment, including the re-use and conservation potential of various alternatives and mitigation measures; and means to mitigate adverse environmental impacts.

(6) List of Preparers. The Environmental Assessment shall list the names and qualifications (expertise, experience, professional discipline) of the persons primarily responsible for preparing the Environmental Assessment or significant background papers.

(7) Appendix. An Appendix may be prepared.

(d) Program Assessment. Program Assessments may be appropriate in order to assess the environmental effects of a number of individual actions and their cumulative environmental impact in a given country or geographic area, or the environmental impacts that are generic of common to a class of agency actions, or other activities which are not country-specific. In these cases, a single, programmatic assessment will be prepared in A.I.D./Washington and circulated to appropriate overseas Mission, host governments, and to interested parties within the United States. To the extent practicable, the form and content of the programmatic Environmental Assessment will be the same as for project Assessments. Subsequent Environmental will be the same as for project Assessments. Subsequent Environmental Assessments on major individual actions will only be necessary where such follow-on or subsequent activities may have significant environmental impacts on specific countries where such impacts have not been adequately evaluated in the programmatic Environmental Assessment. Other programmatic evaluations of classes of actions may be conducted in an effort to establish additional categorical exclusions or design standards or criteria for such classes that will eliminate or minimize adverse effects of such actions, enhance the environmental effect of such action or reduce the amount of paperwork or time involved in these procedures. Programmatic evaluations conducted for the purpose of establishing additional categorical exclusions under §216.2(c) or design

considerations that will eliminate significant effects for classes of actions shall be made available for public comment before the categorical exclusions or design standards or criteria are adapted by A.I.D. Notice of the availability of such document shall be published in the Federal Register. Additional categorical exclusions or design standard or criteria are adopted by A.I.D. Notice of the availability of such document shall be published in the Federal Register. Additional categorical exclusions shall be adopted by A.I.D. upon the approval of the Administrator, and design consideration in accordance with usual agency procedures.

(e) Consultation and Review. (1) When Environmental Assessments are prepared on activities carried out within or focused on specific developing countries, consultation will be held between A.I.D. staff and the host government both in the early stages of preparation and on the results and significance of the completed Assessment before the project is authorized.

(2) Missions will encourage the host government to make the Environmental Assessment available to the general public of the recipient country. If Environmental Assessments are prepared on activities which are not country-specific, the Assessment will be circulated by the Environmental Coordinator to A.I.D.'s Overseas Missions and interested governments for information, guidance and comment and will be made available in the U.S. to interested parties.

(f) Effect in Other Countries. In a situation where an analysis indicates that potential effects may extend beyond the national boundaries of a recipient country and adjacent foreign nations may be affected. A.I.D. will urge the recipient country and adjacent foreign nations may be affect. A.I.D. will urge the recipient country to consult with such countries in advance of project approval and to negotiate mutually acceptable accommodations.

(g) Classified Material. Environmental Assessments will not normally include classified or administratively controlled material. However, there may be situations where environmental aspects cannot be adequately discussed without the inclusion of such material. The handling and disclosure of classified or administratively controlled will be made available to persons outside the Agency as provided for in 22 CFR Part 212.

§ 216.7 Environmental Impact Statements.

(a) Applicability. An Environmental Impact Statement shall be prepared when agency actions significantly affect:

- (1) The global environment or areas outside the jurisdiction on any nation (e.g. the oceans);
- (2) The environment of the United States; or
- (3) Other aspects of the environment at the discretion of the Administrator.

(b) Effects on the United States:

Content and Form. An Environmental Impact Statement relating to paragraph (a)(2) of this section shall with the CEQ Regulations. With respect to effects on the United States, the terms environment and significant effect whenever used in these procedures have the same meaning as in the CEQ Regulations rather than as defined in §216.1(c)(12) and (13) of these procedures.

(c) Other Effects: Content and Form.

An Environmental Impact Statement relating to paragraphs (a)(1) and (a) (3) of this section will generally follow the CEQ Regulations, but will take into account the special considerations and concerns of A.I.D. Circulation of such Environmental Impact Statements in draft form will precede approval of a Project Paper or equivalent and comments from such circulation will be considered

before final project authorization as outlined in § 216.3 of these procedures. The draft Environmental Impact Statement will also be circulated by the Missions to effected foreign governments for information and comment. Draft Environmental Impact Statements generally will be made available for comment to Federal agencies with jurisdiction by law or special expertise with respect to any environmental impact involved, and to public and private organizations and individuals for not less than forty-five (45) days. Notice of availability of the draft Environmental Impact Statements will be published in the Federal Register. Cognizant Bureaus and Offices will submit these drafts for circulation through the Environmental Coordinator who will have the responsibility for coordinating all such communications with persons outside A.I.D. Any comments received by the Environmental Coordinator will be forwarded to the originating Bureau or Office for consideration in final policy decisions and the preparation of a final Environmental Impact Statement. All such comments will be attached to the final Statement, and those relevant comments not adequately discussed in the draft Environmental Impact Statement will be appropriately dealt with in the final Environmental Impact Statement. Copies of the final Environmental Impact Statement, with comments attached, will be sent by the Environmental Coordinator to CEQ and to all other Federal, state, and local agencies and private organizations that made substantive comments on the draft, including effected foreign governments. Where emergency circumstances or considerations of foreign policy make it necessary to take an action without observing the provisions of § 1506.10 of the CEQ Regulations, or when there are overriding considerations of expense to the United States or foreign governments, the originating Office will advise the Environmental Coordinator who will consult with Department of State and CEQ concerning appropriate modification of review procedures.

§ 216.8 Public hearings.

(a) In most instances AID will be able to gain the benefit of public participation in the impact statement process through circulation of draft statements and notice of public availability in CEQ publications. However, in some cases the Administrator may wish to hold public hearings on draft Environmental Impact Statements. In deciding whether or not a public hearing is appropriate, Bureaus in conjunction with the Environmental Coordinator should consider:

- (1) The magnitude of the proposal in terms of economic costs, the geographic area involved, and the uniqueness or size of commitment of the resources involved;
- (2) The degree of interest in the proposal as evidenced by requests from the public and from Federal, state and local authorities, and private organizations and individuals, that a hearing be held;
- (3) The complexity of the issue and likelihood that information will be presented at the hearing which will be of assistance to the Agency, and
- (4) The extent to which public involvement already has been achieved through other means, such as earlier public hearings, meetings with citizen representatives, and/or written comments on the proposed action.

(b) If public hearings are held, draft Environmental Impact Statements to be discussed should be made available to the public at least fifteen (15) days prior to the time of the public hearings, and notice will be placed in the FEDERAL REGISTER giving the subject, time and place of the proposed hearings.

§ 216.9 Bilateral and multilateral studies and concise reviews of environmental issues.

Notwithstanding anything to the contrary in these procedures, the Administrator may approve the use of either of the following documents as a substitute for an Environmental Assessment (but not a substitute for an Environmental Impact Statement) required under these procedures.

(a) Bilateral or multilateral environmental studies, relevant or related to the proposed action, prepared by the United States and one or more foreign countries or by an international body or organization in which the United States is a member or participant; or

(b) Concise reviews of the environmental issues involved including summary environmental analyses or other appropriate documents.

§ 216.10 Records and reports.

Each Agency Bureau will maintain a current list of activities for which Environmental Assessments and Environmental Impact Statements are being prepared and for which Negative Determinations and Declarations have been made. Copies of final Initial Environmental Examinations, scoping statements, Assessments and Impact Statements will be available to interested Federal agencies upon request. The cognizant Bureau will maintain a permanent file (which may be part of its normal project files) of Environmental Impact Statements, Environmental Assessments, final Initial Environmental Examinations, scoping statements, Determinations and declarations which will be available to the public under the Freedom of Information Act. Interested persons can obtain information or status reports regarding Environmental Assessments and Environmental Impact Statements through the A.I.D. Environmental Coordinator.

Appendix D: Assessments of Tropical Forests and Biological Diversity and Policy Papers, 1988 Through 1992

APPENDIX D											
Tropical Forestry and Biological Diversity Assessments and Policy Papers 1988 Through 1992 ^a											
Country	Botswana		Burundi		Côte d'Ivoire	Ethiopia		The Gambia		Senegal	Uganda
Agency	USAID	IUCN	USAID	UNDP	WCMC/ USAID	WCMC/ USAID	UNCED/ USAID	USAID	USAID	WCMC/ USAID	WRI
Year	1988	1990	1989	1991	1991	1991	1992	1989	1990	1991	1992
Maps	X		X		X	X	X			X	
Statistics	X			X	X	X	X		X	X	X
History			X						X		
Climate/ Geography	X		X	X	X	X	X		X	X	X
Species Lists	X		X		X	X					
Parks/Protected Areas	X				X	X					
Enabling Legislation or Policies	X		X	X	X	X	X	X		X	X
Threats	X	X	X		X	X				X	

APPENDIX D

Tropical Forestry and Biological Diversity Assessments and Policy Papers 1988 Through 1992^a

Country	Botswana		Burundi		Côte d'Ivoire	Ethiopia		The Gambia		Senegal	Uganda
Research/ Analysis	X		X					X			
Bibliography	X		X			X				X	X
Recommendation	Yes ^{a,b}	Yes ^{c,d}	No	Yes	Yes	Yes ^{a,e}	No	Yes ^f	Yes ^g	Yes	Yes ^e

Notes: IUCN = International Union for the Conservation of Nature.

UNCED = United Nations Conference on Environment and Development.

UNDP = United Nations Development Program.

USAID = U.S. Agency for International Development.

WCMC = World Conservation Monitoring Center.

WRI = World Resources Institute.

^a Based on Country Environmental Studies: An Annotated Bibliography. WRI, CIDE, 1990; WRI, IIED, IUCN, 1993.

^b Protected areas.

^c An interim status of limited duration intended to provide time for careful evaluation of needed change in a country's long-term status.

^d Conservation.

^e Reforestation.

^f Natural resource management strategies.

^g Policy paper.

Appendix E: Examples of Assessments of Tropical Forests and Biological Diversity

Appendix F: Cameroon Concept Paper Excerpt

Appendix G: Generic Scope of Work for Preparation of CPSP-Related Background Studies on Biological Diversity and Tropical Forests