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Manual

Environmental Documentation Manual

For P L 480 Title II Cooperating Sponsors Implementing Food-Aided Development Programs

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and the
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FOREWORD

Food commodities are a major resource not only for humanitarian assistance, but also for development In FY 97, the U S Government provided $1 1 billion of food through P L 480 (the Agricultural Trade Development and Assistance Act of 1954) to 63 developing and re-industrializing countries Some $821 million of this food was provided through the Title II program managed by USAID, which assisted 43 million beneficiaries in 53 countries Title II is implemented both through Private Voluntary Organization (PVOs), known as Cooperating Sponsors (CSs), as well as through the U N 's World Food Programme (WFP), both of whom carry out development and emergency food aid programs Of the $821 million of Title II funding in FY 97, $309 was provided to CSs to carry out development food aid programs, which support activities in maternal and child health, agricultural production, natural resource management and infrastructure development (e g roads, bridges, latrines, wells and small-scale irrigation systems) By and large, these important activities carried out by PVOs have not in the past been subjected to USAID's environmental review process USAID's Bureau for Humanitarian Response, Office of Food for Peace (BHR/FFP) and Bureau for Africa, Office of Sustainable Development (AFR/SD) have been collaborating over the past year in systematically introducing approaches to apply USAID's legally mandated Environmental Procedures ("Reg. 216") to programming of developmental food aid. USAID expects that the incorporation of environmental oversight, and the analysis and planning associated with it, will ultimately enhance the technical design and appropriateness of Title II interventions, and thus improve the sustainability and impact of these programs

The present *Environmental Documentation Manual* (EDM), which was conceived in early 1997 as the "Environmental Information Package," was developed through collaboration involving the Office of Food for Peace (BHR/FFP) and the Bureau for Africa, Office of Sustainable Development, as well as the Environmental Working Groups organized by Food Aid Management (FAM) and USAID/Ethiopia. The Environmental Working Groups worked on behalf of the Cooperating Sponsors dealing with development food aid programs, and provided dedicated and indispensable critiques of earlier drafts We hope this has made the Manual far easier to use and interpret by those working in the field who for the first time are encountering the intricacies of USAID environmental regulations as applied to food aided development

Ms Charlotte Bingham, primary author, is the Regional Environmental Officer for USAID's Regional Economic Development Services Office for East and Southern Africa (REDSO/ESA) based in Nairobi, Kenya An expert environmental planner, she has also been a lead organizer and trainer in the Africa Bureau's Environmental Capacity Building (ENCAP) initiative jointly developed with co-author Dr Walter Knausenberger, the Environmental Advisor and Analyst in the Bureau for Africa's Office of Sustainable Development (AFR/SD) Knausenberger took the initiative to provide continuing support to BHR/FFP in assisting Title II Cooperating Sponsors come to grips with the environmental compliance process Mr Wes Fisher, of Tellus Institute, is a natural resources specialist and trainer engaged under EPIQ in the Africa Bureau ENCAP Initiative, and has provided critical support in the Manual's preparation. The Cooperating Sponsors are now interested in addressing the underlying reasons for the procedures and in moving beyond compliance to more effectively incorporate environmental principles and practices in their development work. The FAM Environmental Working Group has already begun to support them in this endeavor, assisting Cooperating Sponsors through a combination of training, technical assistance and information transfer to increase the application of sounder environmental design and management to developmental food aid programs and activities

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Without the support and engagement of many collaborators, this Manual would not have seen the light of day Special thanks go to David Nelson, Chief of the Development Programs Division in the Office of Food for Peace in USAID's Bureau of Humanitarian Relief (USAID/BHR/FFP/DP), who embraced the challenge of helping Cooperating Sponsors (CSs) achieve compliance with USAID's Environmental Procedures in a period of declining USAID resources Susan Morawetz, USAID/BHR/FFP/DP Project Officer, shepherded this process from its inception and has not only educated the drafters of this document on the needs and constraints faced by Title II PVOs, but helped to define with the CSs the timetable and assistance needed to minimize the burden they faced in trying to achieve environmental compliance

For their encouragement and guidance, we are indebted to the Agency Environmental Coordinator James Hester, and Bureau Environmental Officers Paul des Rosiers (BHR and Global), Carl Gallegos (Africa), and Jeffrey Goodson (Asia, Near East) Joan Harrigan Farrelly, Women in Development Fellow with PPC/ENV, provided useful text on participation. David Atwood, Chief of the Productive Sector Growth and Environment Division, USAID AFR/SD, and Dennis McCarthy, Chief of the Agriculture and Environment Office of USAID/REDSO in Nairobi, wholeheartedly supported the efforts of the authors in this collaboration with the Bureau for Humanitarian Response

As pioneers in tackling the early drafts of the guidance, the members of the Ethiopia Environmental Working Group organized by USAID/Ethiopia, deserve special thanks for providing helpful interpretations and challenging questions We appreciate the initiative and support shown by USAID/Ethiopia Food and Humanitarian Assistance Office, especially Herbie Smith, Carrel Laurent, Joy Shiferaw and Sarah Douglass Among the CSs in the Ethiopia Environmental Working Group, we especially appreciate the contributions of Andrew Barnes of FHI Ethiopia, Kari Egge of CRS

In Washington, D C , the Food Aid Management (FAM) liaison center also promptly established an Environmental Working Group (EWG) which became very actively engaged in formulating approaches to help Cooperating Sponsors address the Environmental Procedures Paige Harrigan, Program Associate with FAM, has ensured close communication with the Environmental Working Group through the entire EDM drafting and review process FAM's Director, T J Ryan and Paige have facilitated these meetings, which have dealt not only with the EDM's development, but also grappled with how and when training in the use of the EDM will be provided. FAM EWG members who have been particularly active in reviewing the EDM and providing insightful comments on its content and format include Tom Remington of CRS Kenya who served as EWG Washington D C chair until his posting in Africa, Carlos Perez and Bob Bell of CARE, Sheryl Cowan of Africare, Amy Volz of ACDI/VOCA, David Ameyaw of ADRA International, Susan Bornstein of Technoserve, Ben Hoskins of WVRD, and Kevin Connor, Mendez-England. Gaye Burpee of CRS Baltimore, and Tom Gardiner of ACDI-VOCA Cape Verde, also provided insightful review and suggestions for the EDM

Finally, we have benefitted greatly from the skills of Michael Matthews, accomplished editor and publication services manager with AMEX International, which supports AFR/SD/PSGE, and helped produce the many drafts Likewise, the facilitation and technical and editorial support of EPIQ/IRG's Bob Winterbottom, and Tellus Institute staff, especially Michael Lazarus and Michael Ruth, is sincerely appreciated.

Charlotte Bingham, Walter Knausenberger and Wes Fisher
January 1998

Glossary of Acronyms and Abbreviations

AFR	Bureau for Africa (USAID)
BEO	Bureau Environmental Officer
BHR/FFP	Bureau for Humanitarian Response, Office of Food for Peace (USAID)
CE	Categorical Exclusion
CFR	Code of Federal Regulations
CITES	Convention on the International Trade in Endangered Species
CSs	Cooperating Sponsors (PVOs & NGOs)
DAP	Development Activity Proposal
DP	Development Programs
EA	Environmental Assessment
EDG	Environmental Decision Guide
EDM	Environmental Documentation Manual
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPAT	Environmental Policy and Training Project (ended September 1996)
EPIQ	Environmental Policy and Institutional Strengthening Indefinite Quantity Contract (USAID-funded consortium initiated Oct. 1996)
ESA	Eastern and Southern Africa
EWG	Environmental Working Group
FAA	Foreign Assistance Act
FACG	Food Aid Consultative Group
FAM	Food Aid Management (association of PVOs using food aid in international development and relief programs, funded by USAID/BHR/FFP)
FAO	Food and Agriculture Organization
FAQ	Frequently Asked Questions
FFP	Office of Food for Peace, USAID/BHR
FFW	Food-for-Work
FY	Fiscal Year
GIS	Geographic Information System
ha	hectares
IEE	Initial Environmental Examination
IFFD	Integrated Food for Development, CARE
IPM	Integrated Pest Management
IR	Intermediate Result
IUCN	International Union for the Conservation of Nature
LOP	Life-of-Project funding
M&E	Monitoring and Evaluation
MEO	Mission Environmental Officer (USAID)
MOA	Ministry of Agriculture
ND	Negative Determination
NEAP	National Environmental Action Plan
NGO	Non-Governmental Organization (in USAID usage, applies mainly to host-country organizations)
NRM	Natural Resources Management

PAA	Previously Approved Activity
PEA	Programmatic Environmental Assessment
P L 480	Public Law 480—Agricultural Trade Development and Assistance Act of 1954 providing for assistance in the form of food commodities
PRC	Project Review Committee
PVO	Private Voluntary Organization (in USAID usage, applies mainly to U S international PVOs)
REA	Regional Environmental Advisor
REDSO	Regional Economic Development Support Office (USAID)
Reg 216	Informal short form of USAID's Environmental Procedures, 22 CFR Part 216 Also Regulation 216 or colloquially sometimes as "Reg 16"
REO	Regional Environmental Officer (USAID)
SD/PSGE	Office of Sustainable Development/Division of Productive Sector Growth and the Environment, Bureau for Africa (USAID)
SO	Strategic Objective
SOW	Scope of Work
TA	Technical Assistance
TII (Title II)	One of the main provisions of P L 480 applying to food aid programmed by PVOs
U N	United Nations
UNCED	United Nations Conference on Environment and Development
UNHCR	United Nations High Commission for Refugees
U S	United States
USAID	U S Agency for International Development
USEPA	U S Environmental Protection Agency
WCA	West and Central Africa

Section 1

Introduction to the Environmental Documentation Manual

1 INTRODUCTION TO THE ENVIRONMENTAL DOCUMENTATION MANUAL

1 1 Overview

This Environmental Documentation Manual (EDM) has been specifically developed to assist Title II private and voluntary organizations (PVOs) in designing environmentally sound development activities and in bringing their activities into compliance with USAID Environmental Procedures It may also be useful for PVOs carrying out development activities with other sources of support. This document contains four sections and eight annexes

- Section 1 introduces the Manual and describes the rationale for compliance It also summarizes USAID and PVO Title II responsibilities, briefly reviews some of the environmental terminology, and identifies potential resources to assist you with your environmental analysis process The terms and concepts, some of which may be unfamiliar, are discussed in detail in the sections that follow

- Section 2, the **Environmental Decision Guide,** helps you classify your activities under Title II in accordance with the Agency's environmental procedures This is your first step in preparing environmental documentation to submit with your Development Activity Proposal (DAP) or Previously Approved Activity (PAA)

- Section 3, **Organizing the Initial Environmental Examination (IEE),** is used when you determine through the Environmental Decision Guide that you must prepare an IEE to meet compliance requirements

- Section 4, **Writing the IEE**, describes preparation of the IEE narrative and associated analysis and covers principles and tools of environmental review

- Section 5, **Frequently Asked Questions,** assembles questions that have arisen about DAP/PAA environmental compliance, especially those posed by members of the PVO Environmental Working Group of Food Aid Management (FAM) and a PVO/USAID working group in Ethiopia.

- The Annexes include forms and sample USAID compliance documents, other useful information on the compliance process, and some lists of useful references

Please refer to Section 5 after reading the four main sections It provides supplementary information about the rationale for Title II environmental compliance, responsibilities, and timelines, various aspects of compliance documentation, and the environmental analysis process As questions arise, refer to this section for answers Otherwise, contact your USAID Mission or the Bureau for Humanitarian Response (BHR) at USAID or the Bureau Environmental Officer (BEO), either the one for BHR or the one for your geographic region (Africa, Asia/Near East, Europe and Newly Independent States, and Latin America)

We hope that the step-by-step process outlined in this package will make adopting USAID environmental procedures easier Experience has shown that complying with procedures strengthens development activities and makes them more sustainable This Manual may appear daunting, but it is intended to make environmental compliance less burdensome Taken section by section, starting with this Introduction and Environmental

Decision Guide, the process of deciding on the type of environmental documentation required, and preparing and submitting it, is not nearly as difficult as it first appears

This section of the Manual is designed to help Cooperating Sponsors (CSs) understand

- why Title II activities are subject to USAID Environmental Procedures,
- what the general procedures are,
- how Cooperating Sponsors can apply the procedures,
- who is responsible for what,
- the timeline for submission and approval of specific documents, and
- opportunities for obtaining assistance in achieving compliance

As you prepare environmental compliance documentation, work closely with your USAID Food for Peace Officer (FFP), the Country Mission Environmental Officer (MEO), and, when needed, the BEO at the BHR. You may also consult with USAID's Regional Environmental Officer (REO) (if one exists) or your respective geographic BEO

1 2 USAID's Environmental Procedures Applied to Food Aid Programs

USAID's Environmental Procedures are meant to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design stage, (2) these consequences are considered prior to funding approvals and activity implementation, and (3) where possible, activities are identified that preserve or restore the natural resource base

Since 1977, USAID's Environmental Procedures[1] (known as Regulation 216 or Reg 216) have applied to all new projects, programs, or activities authorized or approved by USAID and to substantive amendments or extensions of ongoing projects, programs, or activities The purpose of the procedures is to

- ensure that environmental consequences of USAID-funded activities are identified and considered in the design and implementation of activities prior to final decisions to proceed,
- assist countries in strengthening their environmental evaluation capabilities,
- define limiting environmental factors that constrain development, and
- identify activities that can assist in sustaining or restoring the natural resource base

USAID has determined that many food-assisted development activities have not been in compliance with USAID's Environmental Procedures For example, Table 1 1 illustrates some typical P L 480 interventions that typically have environmental impacts Compliance with Reg 216 is required of Title II (TII) Development Activities By the end of FY 98, all TII activities must have environmental documentation submitted and approved by USAID Refer to Annex D-1 (Official USAID Guidance) and Section 5 (Frequently Asked Questions) for more information on the timing of the submission of IEEs and Categorical Exclusions

In addition to compliance with Reg 216, **Cooperating Sponsors (CSs) are encouraged to look beyond**

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[1] The procedures, published in final form in the fall of 1980, are codified in 22 CFR 216 (Title 22 Code of Federal Regulations, Part 216), a copy of which is included as Annex D.2

compliance and, where relevant, to incorporate sound environmental planning into activity designs to ensure that TII-supported activities not only "do no harm," but actually improve the long-term sustainability of the natural resource base upon which food security depends (see Box 1 1) This approach is particularly relevant as Title II humanitarian resources are increasingly being programmed in concert with strategic development objectives, and often in conjunction with direct dollar grant resources

1 3 General Procedures

Nearly all USAID-supported projects, programs, and activities are subject to USAID's Environmental Procedures and need some environmental documentation One exception is an Exemption for international disaster assistance, including emergency food aid. The applicability of the Exemption needs to be documented in the DAP or PAA Categorical Exclusions (stipulated in the Agency's regulations) are applicable to training, nutrition, family planning, small-scale research, etc , and require only limited documentation Nevertheless, Categorical Exclusions must be documented as such and approved by USAID In all other cases, an Initial Environmental Examination (IEE) is required and sometimes, an Environmental Assessment (EA) These terms are discussed in Section 2

Box 1 1 Environmentally Sound Design and Management of Food Aid Activities—The CARE/Bangladesh Example

In Bangladesh CARE s Integrated Food for Development (IFFD) project has an extensive set of environmental analysis procedures that include a two-step environmental assessment process provision for environmental management planning, and long-term environmental monitoring

In 1991 during the design of IFFD, a programmatic environmental assessment revealed that CARE's extensive feeder road reconstruction under this Title II Food Aid Project could have potential impacts on drainage farm productivity and fish production, in addition to dividing floodplain areas As a result CARE, in association with its national implementing partner established an environmental analysis program for its IFFD activities CARE staff forms a team with the Local Government Engineering Department to conduct joint pre-work surveys and environmental reviews

Initial reviews using detailed checklists are conducted for each road alignment being considered for rehabilitation These reviews require project staff to evaluate physical (e g , erosion), biological (e g , fish populations), and human interest (e g cultural resources) parameters If the analyses show that a road will have a significant adverse environmental impact in any one or more of these broad categories a more detailed environmental assessment is required This process requires project staff to address the same parameters in greater detail with narrative descriptions of anticipated environmental impacts The procedure also requires development of an environmental management plan (including mitigation measures) and monitoring of impacts after work is completed

IFFD's environmental monitoring system includes the internal procedures mentioned above and a long-term monitoring program that is examining environmental impacts at 12 representative sites throughout the project area This long-term monitoring system examines three key parameters capture fisheries agricultural land, and human settlements

CARE/Bangladesh has a related training component and specific manuals and guidelines that are used in this environmental analysis process

Contact Chris Perrine Technical Advisor, IFFD

1 4 Process, Roles, and Responsibilities

Cooperating Sponsors (CSs) will initiate the environmental documentation process Such documentation can take the form of a Categorical Exclusion, an IEE, or an EA, but most typically will be a Categorical Exclusion or an IEE In the case of DAPs and PAAs, environmental documentation is prepared in connection with the official submission cycle Guidance for preparing an IEE is provided in Sections 3 and 4 CSs should work with Mission Environmental and Food for Peace Officers to ensure that the documentation is adequate, and that appropriate mitigation and monitoring measures are incorporated into activities

CSs are asked to do as much of the background work as possible to comply with Reg 216 Ideally, the CS submits actual draft environmental documentation. This is consistent with USAID's intent under re-engineering to promote flexibility and transfer more responsibility to its collaborators The CSs know their activities and local environment better than anyone else and are best suited to determine appropriate mitigation and monitoring measures

CSs, working with Mission Officers, are expected to finalize draft environmental documentation and submit it to the USAID Mission (prior to formal DAP submission, if possible) for review and clearance However, the Mission may prefer to prepare the document itself, based on input from the PVO Thus, the PVO should discuss this matter with the Mission, typically the Mission Environmental Officer (MEO), prior to preparing the environmental documentation. Whichever approach is taken, the Mission Director or his/her designee must clear the IEE or Categorical Exclusion request prior to final IEE/Categorical Exclusion and DAP approval by USAID/Washington

Once the Mission has cleared the IEE/Categorical Exclusion, a signed copy should be sent to Washington (preferably as part of the DAP/PAA submission), where it must be cleared by the Director of FFP as a request for BEO concurrence Concurrence by the USAID BHR BEO is the last step in the approval process Geographic Bureau clearances are not required, although CSs are free to send geographic BEOs informational copies of environmental documentation, and to seek these individuals' guidance and expertise during IEE preparation and project design. The BHR BEO will also provide informational copies of IEEs to the relevant geographic BEOs and seek their input, as appropriate

For more on who does what, see the DAP Guidance in Annex D-1, and Question 2 2 in Section 5 (Frequently Asked Questions)

1 5 Resources to Support Environmental Analysis and Capacity Building

Considerable interest exists within USAID and the Title II PVO community in moving beyond compliance to focus on improving environmentally sound technical and operational design and management of our development activities To do so, PVOs may need to increase their capacity, including working with partner indigenous NGOs and other organizations Useful resources are available within host country universities, among host government environmental/natural resource planning and management units, and through in-country private consultants It also may be possible to capitalize on available training courses in technically specific areas of value to NGOs/PVOs and others The summary information and suggestions provided in the *Environmental Guidelines for Small-Scale Activities in Africa* and the recommendations provided in the paper, *Beyond Compliance Environmental Review and Public Law 480 Food Aid Programing* provide a useful starting point (Catterson and Knausenberger 1997)

There are many other valuable handbooks on environmentally sound design and management of small-scale projects Most notable among these are documents that are part of a CODEL series (available from VITA) covering small-scale activities in agriculture, forestry, livestock, integrated conservation and development projects, and water projects (see the References section of the Africa Bureau's *Environmental Guidelines* for a complete listing) Also, *Project Food Aid, User's Guide for the Design of Food-Aided Development Projects* by Bryson, et al (1991) provides excellent guidance on the adoption of sound food aid management practices in all sectors (see especially Part III, Section 9 on natural resources management) See Annex H-for a fairly comprehensive listing of reference documents, most of the citations include information on how to obtain the documents

USAID and FAM (in their supporting role as a networking unit for Title II PVOs), have generated and received numerous ideas for how best to provide additional resources and capacity to support environmental analysis Some of these ideas are discussed in Section 5 We welcome your additional suggestions and thoughts

1 6 Resource Agencies

The following is a list of key contact points knowledgeable about the USAID environmental compliance process in the context of food aid

USAID

Agency Environmental Coordinator
Bureau for Program and Policy Coordination Environmental Office (PPC/ENV)

Bureau for Humanitarian Response (BHR)
Office of Food for Peace, Development Programs Division (BHR/FFP/DP)
BHR BEO (located in G/ENV/ENR)

Geographic Bureaus
BEO, Bureau Environmental Advisor(s), and Regional Environmental Officer(s)

Other
Environmental Working Group, USAID/Ethiopia
MEOs
Food for Peace Officers (FFPOs)

Food Aid Management

Environmental Working Group Support Specialist

Table 1 1 Typical P L 480 Activities and Their Potential Environmental Implications

Type	Activity	Potential Adverse Environmental Impacts
Irrigation	- usually rehabilitation of older schemes w/ occasional new construction - river diversions - dam and pond construction - land leveling	- proliferation of waterborne diseases - destruction and/or impairment of wetlands - salinization of soils - alteration in aquatic ecology, including fisheries - water pollution (non-point source farm runoff) - effects on downstream water flow and deposition - water use conflicts
Water Supply and Sanitation Development	- setting up potable water systems and sewerage - water catchments - well construction	- groundwater aquifer drawdown or depletion - siltation of reservoir - waterborne disease proliferation
Health Services Programs	- immunizations - AIDS/HIV treatment	- medical and biohazardous wastes - disposal of used/spent needles and safety/disease potential
Rural Infrastructure	- construction and/or rehabilitation of secondary and tertiary (farm to market) roads - bridge and culvert construction - construction of public buildings (health posts, schools)	- opening of otherwise intact forest or protected areas to exploitation and/or destruction - erosion and uncontrolled runoff from improper construction practices or lack of adequate drainage - impacts on land use, e g , wetlands or farmlands
Natural Resources Management	- soil and water conservation engineering (bunds, terracing, etc) and reforestation - land clearing - exotic species introduction (e g non-indigenous seed)	- improper/incomplete structures add to erosion potential - inadvertent shifts in land use patterns - destruction of natural or secondary forest for reforestation with exotic species - disruption of ecosystem balance through commercial production or harvesting of fauna or flora - displacement of endemic species, weediness
Crop Protection, Vector Management, Livestock Ectoparasite Control	- introduction and application of pesticides - use of dip vats	- water pollution (non-point source farm runoff) - environmental contamination - human contact with toxic substances - residues in food commodities, milk and meat - poisoning of livestock

Section 2

Environmental Decision Guide (EDG)

2 ENVIRONMENTAL DECISION GUIDE (EDG)[2]

2 1 Introduction

2 1 1 Purpose of the Environmental Decision Guide

This guide helps you to classify Title II activities when preparing environmental documentation for submission with your DAP or PAA Always start with this guide, if it directs you to prepare an IEE, go to Section 3

We suggest you use the Guide first for ongoing activities and planned or proposed activities for FY 99, whether they involve a new DAP or a PAA An IEE should represent the entire life-of-project (LOP) activities, even if some were begun long before IEE submission However, as is stated in the Environmental Compliance Information (reproduced in Annex D 1 of this Manual) of the Information Packet Relating to *BHR/FFP Development Programs P L 480 Title II Guidelines for FY 1999 Program Proposals*, "it may not make sense" to prepare an environmental review near a program's completion. This decision should be reached in consultation with the Mission, BHR, BEO, and FFP

2 1 2 Organization of Guide

The Guide has two principal parts (1) this introduction, which explains the purpose of the Guide, what you will need to use it, where to go for help, how to begin, and important definitions, and (2) a Step-by-Step environmental decision process which helps you determine the Reg 216 classifications of your activities and the type of response you will need to make to meet Reg 216 requirements

2 1.3 Effective Use of the Guide

The most important first step is to gather information about all activities you are planning as part of your DAP or PAA, including location, specific nature, and all components of the activity, including any ancillary activities related to the primary activity For example, if you are assisting with development of small-scale irrigation, is a road being built as part of the irrigation activity? What are the specific physical components of the activity, such as small-scale irrigation that requires a diversion or a dam, water distribution canals, leveling of land, possible relocation of farmers, etc ?

If you have activities for which detailed information is not available, gather whatever information you can about the generic nature and general location of such activities

The information you gather should be organized in table(s) that facilitate decisions about the next steps Sample Summary tables are provided later in Sections 2 and 4 An example table is illustrated in Annex E Definitions of terms and explanations of how to fill out these tables are provided in the Guide instructions that follow

2 1 4 Obtaining Help

You may need two principal types of assistance and information

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[2] Use EDG first, if EDG says to do IEE, go to Section 3

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- Clarification or information regarding USAID environmental procedures and use of the Guide For information relating to USAID procedures and this guide, contact the MEO, who will be able to help you or to refer your questions to a regional office or an appropriate BEO

- Technical or topical information concerning the environment or the relationship of your activity to its setting If you need information about the environment or setting in your particular location, contact appropriate in-country agencies and organizations For example, if you need to know if there are protected areas, such as parks or reserves, in the vicinity of your activities, contact the responsible Ministry or Authority in the country In certain instances, you might want to approach specialists at the university or environmental NGOs working in the country The MEO may be able to help you identify these contacts

2 1 5 Beginning to Use this Guide

Read through the entire Environmental Decision Guide first Look at the accompanying flow charts to gain an idea of the overall process Note the additional resource information provided elsewhere in the Manual to which this guide will refer you from time to time Remember that the purpose of this guide is to help you determine what form of environmental documentation you will need to comply with the Agency's environmental regulations and, in the process, to help you design and undertake environmentally sustainable activities

2 1 6 Important Definitions Types of Environmental Decisions

Reg 216 defines several types of environmental decisions (also called classes of action in the regulation) and types of environmental effects

Exemption Exemptions are classes of action not subject to Reg 216 Nevertheless, prudent and sound environmental practices should be applied. See Section 2 2 1 of this guide

Categorical Exclusion Categorical Exclusions are classes of actions that typically do not affect the environment, such as studies, seminars, or training They require only brief documentation that supports the applicability of the exclusions as defined in Reg 216 See Section 2 2.2 of this guide

Threshold Decision This is a formal USAID decision that determines, based on an IEE, whether a proposed action is a major action that significantly affects the environment.

No Significant (Adverse) Effect This term refers to activities **not** expected to do significant harm to the biophysical environment—under normal conditions and with good practices [Under Reg 216, an effect is considered significant (in most cases) when an action does significant harm to the environment] Many if not most of USAID's activities are not specifically listed in Reg. 216, i e , they are not exempt, nor are they Categorical Exclusions, and yet these activities do not normally have a significant effect on the environment. **Many development activities that do not have significant effects—and are neither exempt nor categorically excluded—still have an environmental documentation requirement.**

An IEE is the document normally needed to determine whether an activity has significant or insignificant adverse impact An IEE is required for obligation of funds/implementation of an activity No irreversible commitments of resources can be made before the IEE is approved (see Section 2 2 3)

A threshold decision within an IEE is referred to as a **negative determination,**[3] if the activity has no significant (adverse) effects on the environment If the determination is negative, but some specific conditions merit monitoring (one cannot predict everything) or if there are some specific mitigative measures (i e , measures that can be taken to minimize, avoid, or compensate for adverse effects during construction or implementation), the **negative determination** can be made **with conditions** For example, for construction a condition might be that water quality be monitored or that measures be taken to prevent erosion and siltation

A specific instance of a negative determination with conditions can apply when there are multiple small-scale activities, the details of which are not known when the IEE is prepared, in which case the conditions specify subsidiary environmental reviews Additional information is provided below in Section 3 and in Annex F

Significant (Adverse) Effect The threshold decision is referred to as a **positive determination,** if there could be significant adverse effects As stated above, under Reg 216, an effect is usually considered significant when an action does significant harm to the environment. The regulation has a specific list of actions normally having a significant effect. From a practical point of view and as a matter of Agency practice, this class of action also requires preparation of an IEE In this instance, the IEE is normally the prelude to preparing an EA, which, in the case of a significant (adverse) effect, is the document needed to permit obligation of funds/implementation of an activity No irretrievable commitments of resources can be made before the EA is completed **The regulation permits one to prepare an EA without preparing an IEE first, but this guide does not recommend that approach** (See Sections 2 2 3 and 2 2 4)

Under Reg 216, an EA is prepared for USAID actions outside the U S , but this does not apply when these actions might affect the U S , the global environment, or areas outside the jurisdiction of any nation, such as oceans Where such effects might occur, as determined by the Agency Environmental Coordinator,[4] Reg 216 calls for preparation of an Environmental Impact Statement (EIS) The EIS requirement is very rarely invoked—only one has been done in USAID's history (but see 2 2 4 below—relating to pesticides and endangered species)

Deferral A deferral requires documentation, usually within the context of an IEE, that explains why a threshold decision cannot be made, typically because of insufficient information Deferring a threshold decision of an activity or a specific component thereof also means deferring implementation Deferrals only postpone the inevitable—one must return to do an amended IEE to resolve the outstanding deferral of a decision In some cases, particularly small-scale activities, the negative determination with conditions that require subsidiary environmental reviews is preferable

See Box 2 1 and Figure 2 1 (Decision Tree for Reg 216), which summarize these classes of actions

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[3] Think of negative and positive in medical terms For example, a negative tuberculosis test indicates that you do not have the disease

[4] The person in charge of application of Reg 216 for USAID

Box 2 1 Main Types of Reg 216 Environmental Decisions—at a Glance (Refer to Figure 2 1)

- **Exemption**
- **Categorical Exclusion**
- **Threshold decisions**
  - No Significant (Adverse) Effect (or Impact)—IEE needed
    - *Negative Determination*
      - Without Conditions
      - With Conditions
  - Significant (Adverse) Effect—IEE not necessarily needed (but recommended by this EDG)
    - *Positive Determination*
      - Environmental Assessment
      - Programmatic Environmental Assessment
- **Deferral**

2 2 The Step-by-Step Environmental Decision Process

This portion of the EDG has four parts (go through each in order)

- Section 2.2 1 helps you determine whether any of your activities are *exempt* from USAID environmental procedures
- Section 2 2 2 helps you determine if any of your activities qualify for *Categorical Exclusions*
- Section 2 2 3 helps you categorize your activities or activity components that will require an *IEE*
- Section 2 2 4 can be used to identify whether any of your activities require an *EA*

Very often the activities or their components under a DAP or PAA fall under more than one class of action. It is therefore possible to classify some activities in one way and some in another This is typically the case

Please note that the section (§) numbers from the Agency's environmental regulation are cited below as appropriate Actual excerpts from Reg 216 are italicized. These are provided as a convenience, since you may need to cite them in preparing the environmental documentation based on the outcome of using this guide You may also use the section numbers to help find the full text in the regulation, which is provided in Annex D 2

Organize the list and information about proposed and planned activities (see Section 2 1 3), including their various components, in a table similar to Table 2.2 or 2 3, found as blank templates at the end of the EDG Then answer the questions below

2.2 1 Are Any of Your Activities Exempt from USAID Environmental Procedures?

Justifications that allow activities to be exempt from the Agency's environmental regulation are limited. This Environmental Documentation Manual is directed at food-aided **development** activities Emergency activities are not addressed here If you have reached the point of using this guide, your activities are **probably NOT**

exempt.

- **Exemptions** [§216 2 (b) (1)] [5]

  (1) Projects, programs, or activities involving the following are exempt

  (i) International disaster assistance [International disasters are declared by the U S Ambassador in the country(ies) involved, including those that receive emergency food aid],

  (ii) Other emergency circumstances, and

  (iii) Circumstances involving exceptional foreign policy sensitivities

Sometimes Title II activities are exempt because they are undertaken as part of international disaster assistance, which could involve emergencies (for example, civil strife, famine, major earthquake, or flood) Make certain you determine which activities are exempt for this reason and obtain the appropriate citation for each There are instances in which "notwithstanding" authorities will be invoked for emergency actions that have the effect of waiving certain normally required provisions These instances will need to be determined in consultation with USAID **The exemptions of §216.2(b)(1) are not applicable to assistance for the procurement or use of pesticides**

It is **rare** for development activities to qualify for exemptions Permission for an exemption under (ii) and (iii) is required from the highest levels of USAID and from the President's Council on Environmental Quality In the rare event that your activities might qualify for exemptions (ii) and (iii), a formal written determination, including a statement of justification is required for each project, program, or activity The determination is made by the Assistant Administrator with responsibility for the program, project, or activity, or by the Administrator, where authority to approve financing is reserved for the Administrator The determination is made after consultation with the Council on Environmental Quality (a rare event) regarding the environmental consequences of the proposed program, project, or activity

Table 2 1 lists several kinds of PVO activities that USAID may determine to be exempt

If you have activities that might fall under (i), (ii), or (iii), consult the MEO as soon as possible to confirm that an exemption might be in order Include appropriate information in your DAP or PAA indicating what activities are exempt and why These do **not** need to be included in the Categorical Exclusion, IEE, or EA document(s)

Although emergency food aid does qualify for exemption, PVOs are encouraged to develop environmentally sensitive programs and to coordinate their activities with the United Nations High Commission for Refugees (UNHCR), which has environmental procedures for refugee operations

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[5] All italicized text in this section is directly quoted from Reg 216

Table 2 1 Illustrative Activities That May Qualify for Exemption	
Type of Activity	**Reason for Exemption**
Emergency relocation of flood victims	Immediate response required, no alternatives available
Refugee camp establishment for rural populations caught in civil strife	Displaced populations without means or land to grow food, no immediate alternatives available
Emergency medical infrastructure, materials, and equipment for victims of war	Emergency medical requirements for injured populations

2.2 2 Do Any of Your Activities Qualify for Categorical Exclusions?

The following criteria, from 22 CFR 216 2(c)(1), were applied to determine the specific list of Categorical Exclusions in 216 2(c)(2)

(i) The action does not have an effect on the natural or physical environment;

(ii) [USAID] does not have knowledge or control over, and the objective of [USAID] in furnishing assistance does not require, either prior to approval of financing or prior to implementation of specific activities, knowledge or control over, the details of the specific activities that have an effect on the physical and natural environment for which financing is provided by [USAID], and

(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

Use the specific list below from §216 2(c)(2) to determine and cite Categorical Exclusions Use the list above only if the activity meets the criteria but is not specifically listed below

- **Categorical Exclusions** [§216 2(c)(2)] [6]

The classes of action defined as Categorical Exclusions and not subject to an IEE or an EA, except as noted. As you review the categories below, if any of the following Reg 216 Categorical Exclusions apply to your activities or components thereof, enter the activity in Table 2 2 with the relevant information

[6] All italicized text in this section is directly quoted from Reg 216

(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 [Note a working definition of small would be fewer than four hectares (ha) or ten acres]

(iii) Analyses, studies, academic or research workshops and meetings,

(iv) Projects in which USAID is a minor donor to a multidonor project and there are no potential significant[7] effects upon the environment of the United States, areas outside any nation's jurisdiction or endangered or threatened species or their critical habitat [Note USAID is a minor donor when its total contribution to the project is both less than $1,000,000 and less than 25 percent of the estimated project cost, or USAID'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 of design of the project are followed, but only if the USAID Environmental Coordinator determines that such procedures are adequate],

(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 of Part I of the FAA [22 USCA §§2151 p (b) 2220a (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, waste water treatment, etc) [Note if biohazardous waste is handled, blood is tested, or syringes are used (as in an immunization program), mitigative measures to deal with waste disposal must be identified in an IEE],

(ix) Assistance provided under a Commodity Import Program when, prior to approval, USAID 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

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7 In this particular instance the term "significant" is defined according to the U S Council on Environmental Quality regulations, because it applies to effects on the U S or outside a nation's jurisdiction When effects are limited to countries outside the U S the word significant is defined as causing significant harm to the environment. Should you have an activity that might have significant effects on the U S or that is outside a nation's jurisdiction, consult the BEO

or their use in the host country,

(x) Support for intermediate credit institutions when the objective is to assist in 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 [Note if there could be some biophysical impact from the loans made by the credit institution, for most rural credit programs, procedures for environmental review should be incorporated in the program and this activity should be addressed as part of an IEE],

(xi) Programs of maternal or child feeding conducted under Title II of [Public Law] 480 [Note when there are no on-the-ground physical interventions],

(xii) Food for development programs conducted by food recipient countries under Title III of [Public Law] 480, when achieving USAID'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 [Note PVOs do not receive Title III funds, so this categorical exclusion does not apply],

(xiii) Matching general support and institutional support grants provided to private voluntary organizations (PVOs) to assist in financing programs where USAID's objective in providing such financing does not require knowledge of or control over the details of the specific activities conducted by the PVO [Note Title II is considered a commodity transfer, not a grant Activities supported by 202(e) funds are subject to Reg 216 compliance]

(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent [they are] 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 USAID [Note to date USAID has no such approved criteria or standards, so this categorical exclusion will not apply]

The Categorical Exclusions of §216.2(c)(2) are not applicable to assistance for the procurement or use of pesticides No use of pesticides will be approved unless USAID pesticide procedures have been satisfied. Consult Annex D 2 [22 CFR 216 3(b)] and Annex G

Enter in Table 2 2 all those activities or components thereof to which the above items apply **If all your activities qualify for Categorical Exclusions as defined above, you need only complete the Facesheet and the narrative attachment for a Categorical Exclusion** (as provided in **Annex A.1 and A.2**) in which you describe the activities briefly and cite the relevant section number(s), e g , 216 2(c)(iii) as the basis for the exclusion

It may be helpful to enter Categorical Exclusion Activities in Sample Tables 2 2 or 2 3

2.2.3 Which of Your Activities Need an IEE?

Activities or activity components that are neither Exemptions nor Categorical Exclusions require an IEE and sometimes an EA.[8] Typically, these activities are in a "gray area," because they are neither clearly included nor excluded from further environmental review, nor appear to have significant effects that trigger an EA. IEEs are a decisionmaking tool, and are prepared to provide a first look at possible effects of activities on the environment. An important function of an IEE is to incorporate design modifications and appropriate ways to avoid or reduce potential impacts. It is also used to identify any needed monitoring.

Thus, unless all of your DAP or PAA activities qualify as Exemptions or Categorical Exclusions, you will prepare an IEE. These include all those activities that might trigger an EA and everything else (see Definitions in Section 2.1.6). See Section 2.2.4 of this guide to determine if your activities may or may not have a significant effect. The facesheet for the IEE (Annex A.1) accommodates several determinations, according to the activities involved.

For all activities that are neither Categorical Exclusions nor Exemptions, an IEE will be prepared by the originator of an action. For projects including the procurement or use of pesticides, the procedures set forth in §216.3(b) will be followed, in addition to the IEE procedures.

Review your list of activities and their components.

- You should have already entered into Sample Table 2.2 and/or Table 2.3 those activities eligible for categorical exclusions.
- You should now list all additional activities that you have, but are not yet listed in Table 2.2 and/or Table 2.3. After you have prepared the IEE (see Sections 3 and 4), you will be able to determine if these are negative determinations with or without conditions, deferrals, or even, in some rare instances, positive determinations.

For these activities (Section 2.2.3) and any identified in Section 2.2.4, you normally will need to prepare an IEE.

2.2.4 Do Any of Your Activities Potentially Require an Environmental Assessment (EA)?

Activities that can trigger an EA are covered under four sets of regulatory provisions.[9] These are (1) actions normally having a significant effect on the environment [22 CFR 216.2(d)(1)], (2) some pesticides [22 CFR 216.3(b)], (3) endangered species and critical habitats [22 CFR 216.5], and (4) special provisions of the Foreign Assistance Act as described below. **All those activities or components thereof to which these four provisions apply should be entered in Table 2.2 and/or Table 2.3.**

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[8] Reg. 216 permits one to prepare an EA, if the activities are clearly to be given a positive determination, without preparing an IEE first, but this EDG recommends that you prepare the IEE as a precursor to an EA. Section 4.3 describes what to do if an IEE leads to a positive determination.

[9] And thus are "categorically *included*" because these activities are identified in specific regulatory language as requiring further scrutiny, and possibly an EA.

The regulation defines an EA as "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 " See the Reg 216 language [§216 6] in Annex D 2 for more detail The regulation provides information about the processing, format, and content of an EA, which is a relatively major document (with more detail, coverage, and depth than the IEE) EAs frequently take several months to a year to complete and are not normally applied to small-scale activities

The four regulatory provisions that trigger an EA serve as a potential "red flag" that an EA **might be** required. You will note as you read the items covered by these four provisions that there is no reference to scale or magnitude of actions The need for an EA as opposed to an IEE is a matter of judgment. Thus, you will prepare an IEE, even if you have activities included in this list, so that you can provide information about scale scope, and magnitude of the activities (For example, if your activities are small-scale or if pesticides have a specific kind of registration status, you will indicate in the IEE why mitigative measures and monitoring are sufficient and why an EA might not need to be prepared.) Remember that EAs for small-scale activities are relatively rare Box 2 2 examines the Title II activities that may or may not trigger an EA

When subjective judgments about scale or magnitude are involved, it may be prudent to involve a team with varied technical expertise in the determination process Perhaps an EA that provides an in-depth assessment of the effects of an activity might be warranted. The Africa Bureau *Environmental Guidelines*, Section 5, provides guidance on approaches to EAs, as do numerous other sources, such as the World Bank *Environmental Assessment Sourcebooks* (3 volumes) (1991) See Annex H for other resources Should you find an activity that appears to fall in the EA category, you will need to prepare a scope of work and budget to have it conducted.

If you have sets of similar activities, or you and other Title II sponsors working in the same area have similar activities, you might consider a Programmatic EA (PEA), which looks generically or programmatically at the entire class of actions, such as dams and irrigation interventions in Country X Reg 216 also provides guidance on the use of PEAs [§216 6 (d)] The regulation states they "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 or common to a class of agency actions, or other activities which are not country specific " Classic PEAs are of benefit when a broad examination of a class of impacts is needed, typically in situations where previous EAs have not been performed and there is little past experience to use as a guide See **Annex C Programmatic Environmental Assessments—Special Application** for additional detail

See Section 4 3 for pointers regarding next steps if your IEE leads to a positive determination

- ***"Actions normally having a significant effect on the environment" [§216 2 (d)(1)]***

Reg 216 identifies several generic "classes of action" that are considered *a priori* to have a high potential for causing harm to the environment, and normally requiring an EA. These are

(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) Potable water and sewerage projects other than those that are small-scale

Box 2 2. Synopsis of Common Title II Development Activities that May Require an EA

Food-aided development activities could well invoke an EA if they involve the sorts of actions listed in Section 2.2 4 Specifically, categories of food-aided activities that will require an IEE and could trigger an EA include

- road rehabilitation and construction
- dam construction, river diversion
- development of irrigation perimeters
- pesticide use agricultural, medical, veterinary
- large-scale program of potable water and sewerage
- land leveling or extensive terracing and bunding
- exotic species introduction, if a protected area could be affected

Because PVO activities are typically small in scale, and do not involve new lands development, the examples cited above may not trigger an EA. Therefore, if you think you may have to do an EA, first complete an IEE on the proposed activity Thus, you should prepare an IEE even if you have activities included in this list (of classes of actions normally having a significant effect on the environment, so you can provide information on the scale, scope, and magnitude of the activities The rule to apply is that **when activities include classes of actions normally having an effect on the environment, the CS will first do an IEE**

No definitive standards or written criteria exist to distinguish "small-scale" from "large-scale" and "non-significant" from "significant." It is the role of the IEE to make the case for a threshold decision Communication with the MEO and BEO is advised to help the PVO use the IEE as a means of explaining whether an EA is needed or not An EA may follow as an outcome of the threshold decision in the IEE, but is likely to be relatively rare for the majority of the CSs' activities

- ***Procurement or Use[10] of Pesticides [§216 3(b)]***

Any assistance involving procurement or use of pesticides is subject to USAID's Pesticide Procedures (22 CFR 216 3(b)) In most instances, an IEE suffices to describe the conditions for safe use of pesticides Some types of pesticides require an EA (or EIS), other pesticides may require an EA on the basis of a threshold decision made in an IEE If pesticide procurement or use is part of your activity, you will need to review the specific provisions of 216 3(b) and then determine the USEPA registration status and what restrictions apply with respect to user or environmental hazard and whether USEPA intends to cancel or suspend registration, or has initiated other types of regulatory actions Unless the exceptions (stringent) of 216 3(b)(2) apply, an IEE must be prepared that address the 12 specific types of information required by 216 3(b)(1)(i)

In practice, USAID's pesticide procedures have had an unintended chilling effect on USAID's engagement in pesticide management, because of the perceived technical and informational hurdles Paradoxically, Reg 216 has also tended to minimize the inclination of USAID and its partners to become involved in integrated pest management (IPM) However, there is no reason why the prudent use of well-chosen, so-called general-use and least-toxic pesticides should not be readily justifiable to promote crop productivity Ideally, these can be linked to IPM and sustainable agriculture NRM practices Typically, all that is required to make the case is a properly documented IEE

In order to apply USAID regulations pertaining to pesticides, the name of the pesticide to be used and its USEPA registration status must be known Contact your headquarters PVO support staff and USAID's BEOs for assistance Also, for guidance on pest and pesticide management, refer to Section 3 12, Appendix C and D of the Africa Bureau *Environmental Guidelines* (Knausenberger et al 1996)

See Annex G for more explanation of USAID's Pesticide Procedures and several lists of pesticides canceled, suspended, or restricted by the USEPA (reprinted from Africa Bureau *Environmental Guidelines*, 1996) Users of the EDM may find it useful to obtain up-to-date information on pesticide registration at the following Internet website **<http //www epa gov/pesticide>**

- ***Endangered species and critical habitat [§216.5]***

Following is language from Reg 216 pertaining to endangered species and 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*

Note that the IEE must specifically determine whether the project, program, or activity will have an effect on an endangered or threatened species, or critical habitat.

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[10] "Use" is interpreted broadly by USAID, to include direct or indirect support to actual use such as transport, provision of fuel for transport, storage or disposal, etc —i e , cradle to grave

- ***Provisions of the Foreign Assistance Act (FAA)***

  - *Tropical Forests* Based on amendments to the **1992 FAA, Section 118(c)(14)** assistance must be denied for

    (A) the procurement or use of logging equipment (unless an environmental assessment indicates that all timber harvesting operations involved will be conducted in an environmentally sound manner which minimizes forest destruction, and that the proposed activity will produce positive economic benefits and sustainable forest management systems), and

    (B) actions which significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas

Assistance must also be denied under **Section 118(c)(15)** for the following activities, unless an environmental assessment indicates that the proposed activity will contribute significantly and directly to improving the livelihood of the rural poor and will be conducted in an environmentally sound manner which supports sustainable development

(A) Activities which would result in the conversion of forest lands to the rearing of livestock

(B) Construction, upgrading or maintenance of roads that pass through relatively undergraded forest lands

(C) Colonization of forest lands

(D) Construction of dams or other water control structures that flood relatively undergraded forest lands

- ***Biological Diversity and Endangered Species.***

Section [illegible] of the Foreign Assistance Act specifies that the preservation of animal and plant species through the regulation of hunting and trade in endangered species, through limitations on the pollution of natural ecosystems, and through protection of habitats is an important objective of U S development assistance USAID must ensure that ongoing and proposed actions by the Agency do not inadvertently endanger wildlife or plant species or their critical habitats, harm protected areas, or have other adverse impacts on biological diversity

> **Section 119(g)(10)** provides for the denial of direct or indirect assistance "*for actions which significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas*"

In addition to the endangered species provisions of Reg 216 and the Foreign Assistance Act, the Endangered Species Act of 1973 (as amended in 1978, 1982, 1988, and expected in 1998) and the CITES convention affect USAID-funded actions overseas (see Box 2 3)

Box 2 3 Endangered and Threatened Species. What is CITES?

- CITES is the Convention on International Trade in Endangered Species of wild animals and plants
- CITES began in the mid-1970s with 139 member states as signatories
- CITES is a global alliance whose focus is the protection of plants and animals that otherwise could be over-exploited by unregulated international trade

What are the Appendices of CITES?

The UN sponsored a conference in Sweden in 1972 to recognize the need for focused international efforts to conserve wildlife A treaty evolved from this conference which was designed to control the international trade in species that either were threatened with extinction or could become threatened with extinction Three appendices were created

Appendix I Species in which commercial trade is prohibited *Examples red panda, golden-capped fruit bat and Arowana freshwater fish*

Appendix II Species in which trade is strictly regulated to avoid jeopardizing species survival *Examples Nile crocodile, minke whale and leopard cat.*

Appendix III Species identified by individual CITES parties as subject to domestic regulations to restrict or prevent exploitation *Examples golden jackal, walrus and little egret.*

What is the Red List?

The Red List is the most comprehensive inventory of threatened species and subspecies on a global scale The "IUCN Red List of Threatened Animals" is compiled by the Species Survival Commission (SSC) of IUCN, which has more than 6,000 members

List 1 - Threatened Species
Animals in this category are listed as Critically Endangered (CR) Endangered (EN) or Vulnerable (VU)
Examples African wild dog (EN), black rhino (CR), and cheetah (VU)

List 2 - Lower Risk. Conservation Dependent
Animals in this category are the subject of a targeted conservation program
Examples minke whale, spotted hyena and white rhinoceros

List 3 - Lower Risk. "Near Threatened"
Examples Colobus monkey, white rumped vulture, and shoebill

List 4 - Extinct and Extinct in the Wild
Examples dodo, Vietnam warty pig, and pig-footed bandicoot

What is the U S response?

- The Endangered Species Act of 1973 requires all Federal agencies to undertake programs for the conservation of endangered and threatened species, and prohibits the authorizing, funding, or carrying out any action that would jeopardize a listed species or destroy or modify its "critical habitat." Enforcement authority rests with the U S Fish & Wildlife Service For information by Worldwide Web check. **<http://www fws gov/~r9endspp/endspp html>**

- Broad prohibitions against taking of wildlife are applied to all domestic and international endangered animal species which could apply to threatened animals by special regulation

- Under the Act, authority was provided to acquire land for animals and plants listed under CITES

- The 1998 Foreign Operations Appropriations Act (P L. 105-118) prohibits the use of development assistance funds for any activity which is "in contravention to CITES "

2 3 Next Steps

Step 1 Review the information you have inserted in Tables 2 2 or 2 3 For planning purposes, you may wish to take the information provided in Table 2 2 and restructure it as in Table 2 3, to group the activities by category of expected determination Table 2 2 is meant to be consistent with the structure of the USAID strategic planning and reporting outlines that are organized by Strategic Objectives and Intermediate Results

- If **everything** listed is a Categorical Exclusion, and this list includes all activities contemplated during the Life of Activity, go to Annex A 1 and A.2 and prepare the documentation according to the format specified. Include in the documentation any monitoring for unforeseen effects, if needed See Figure 2 2, which outlines the Categorical Exclusion process graphically

- If the list includes a mix of Categorical Exclusions, activities requiring an IEE, and activities with a potential IEE requirement, go to Step 2

Discuss the Categorical Exclusion with the MEO and go to Step 3

Step 2 A mix of categorical exclusions and other activities requiring an IEE means you need to prepare an IEE Review Figure 2 3

- If some of your activities qualify for a Categorical Exclusion, but the others require an IEE or potentially an EA, you will be able to address all these possibilities on the Environmental Compliance Facesheet, Annex A 1

- Discuss with the MEO the approach you intend to take and go to Section 3 and 4 to help in preparing the IEE according to the format in Annex A 3 Go to Step 3

Every Mission should have a designated MEO However, he or she may not be specifically trained as an environmentalist, or not be familiar with USAID environmental review procedures as applied to Title II Also, situations will arise such as for non-presence countries, where no MEO will be available In any event, please feel free to contact the geographic or BHR BEO

Step 3. The PVO should forward the completed Categorical Exclusion form with the MEO's approval to the BHR FFP Office for clearance and the BHR Environmental Officer for concurrence Preferably, PVOs will submit to FFP via the FFP Country Backstop Officer, for the Office Director's signature Where applicable, the MEO may choose to have this documentation reviewed by the REO, if one exists, or the geographic BEO

Note:

- **If you have only Categorical Exclusions, prepare the Environmental Compliance Facesheet and the Request for Categorical Exclusion (Annex A.2)**

- **If you have Categorical Exclusions *and* activities requiring an IEE, use the forms in Annex A.1 and A.3, after working through Sections 3 and 4 (See Figure 2 3)**

Box 2 4 itemizes the main steps in starting the environmental documentation process using this EDM

Box 2 4 Main Steps in Starting the Environmental Documentation Process with the EDM

1 **Read the Introduction to the EDM to get an overview of your responsibilities and the resources available**

2. **Assemble a comprehensive list of your planned activities**

3 **Use the Environmental Decision Guide (EDG), contained in Section 2, first.**

The EDG will help you decide whether to prepare
A. an Exemption, and/or
B a Categorical Exclusion (CE), and/or
C an Initial Environmental Examination (IEE), and/or
D an Environmental Assessment (EA)

4 **If the EDG leads you to prepare an IEE, go to Sections 3 and 4, which will guide you on how to prepare the IEE.**

5 **Once you have become familiar with this Manual, use the Summary Decision Tree at the end of Section 3 to review your options**

6 **Turn to the Frequently Asked Questions (Section 5) for answers to questions that others have encountered in starting the environmental documentation process**

2 4 Annual Update on Status of Environmental Compliance for Activities with Approved IEEs/Categorical Exclusions

Each year, Cooperating Sponsors should examine their environmental documentation (IEE or Categorical Exclusion) to make sure it is still operative and applicable and that it still covers everything, and no unresolved deferrals exist. If there are substantive changes, you should go back through the Environmental Decision Guide, make new decisions, and amend the documentation using the instructions in this Manual PAA submissions need not include an IEE, if no significant design changes have been made since approval of the DAP and its IEE Nevertheless, the PAA should note, in the "Status of Environmental Compliance" section, that there have been no changes On the other hand, if there are significant changes, the PAA will need to be submitted with an amended IEE

See Annex D 1 for the operative DAP Guidance on Environmental Compliance

Table 2 2 Sample Summary Table. Synopsis of Environmental Decisions for DAP/PAA Activities by [PVO]: FY

Note 1 Illustrative table only, parallels the Strategic Objective (SO) and Intermediate Result (IR) structure of the DAPs, which is meant to facilitate linkage to strategic planning and results reporting See Table E 1 for partially completed table

Note 2 PVOs may want to submit this table with Reg 216 environmental compliance documentation

Provide a general overview of geographic attributes of the DAP activities, and how they are programmed

Types of Activities	Geographic Distribution, Location	Sites/Projects (number, geographic division)	Scale & Quantity of Activity	Unit *[ha etc]*	% of T II*	Expected Determinations *[preliminary only e g , CE, ND, PD, after IEE]*
IR 1						
Subtotal %						
IR 2						
Subtotal %						
Grand Total %						

Acronyms CE Categorical Exclusion, ND Negative Determination, PD positive determination

* % of T II = proportion of Title II resources apportioned to the line items, with subtotals if possible

Table 2 3 Sample Summary Table on Expected Determinations Environmental Decision Guide
Note 1 Illustrative table only, to assist in data aggregation
Note 2 PVOs may, but are not required, to submit this table with Reg 216 environmental compliance documentation

Expected Determinations	Location(s), Scale, Quantity	Data, Quantitative & Descriptive	Citation of relevant Section of Reg 216 (from the Section numbers provided in II, III, or IV)
Categorical Exclusions			
Potential Positive Determination(s) (do IEE first)			
IEE needed			

Figure 2.1 Decision Tree for Regulation 216

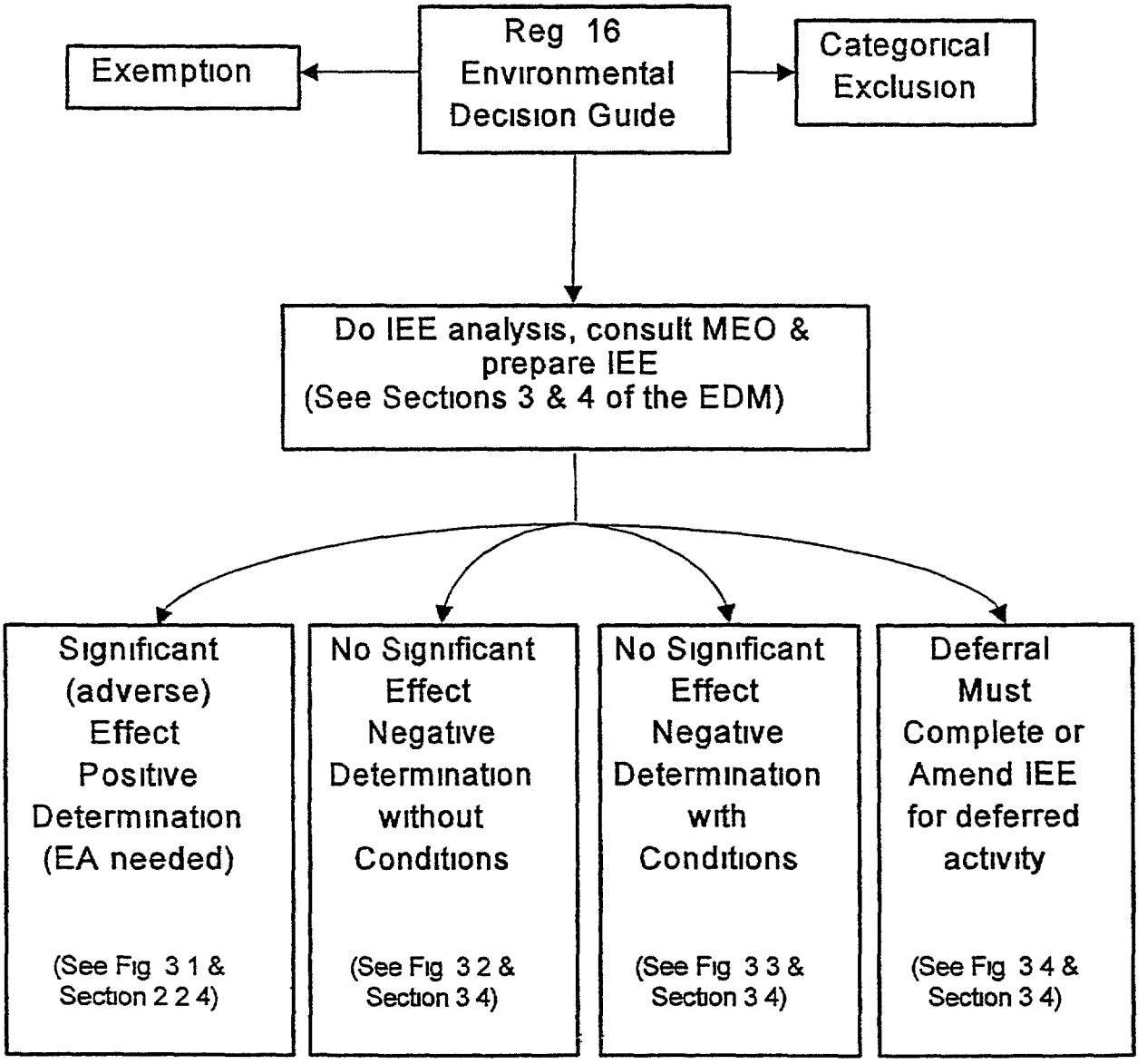


Figure 2 2 Categorical Exclusions

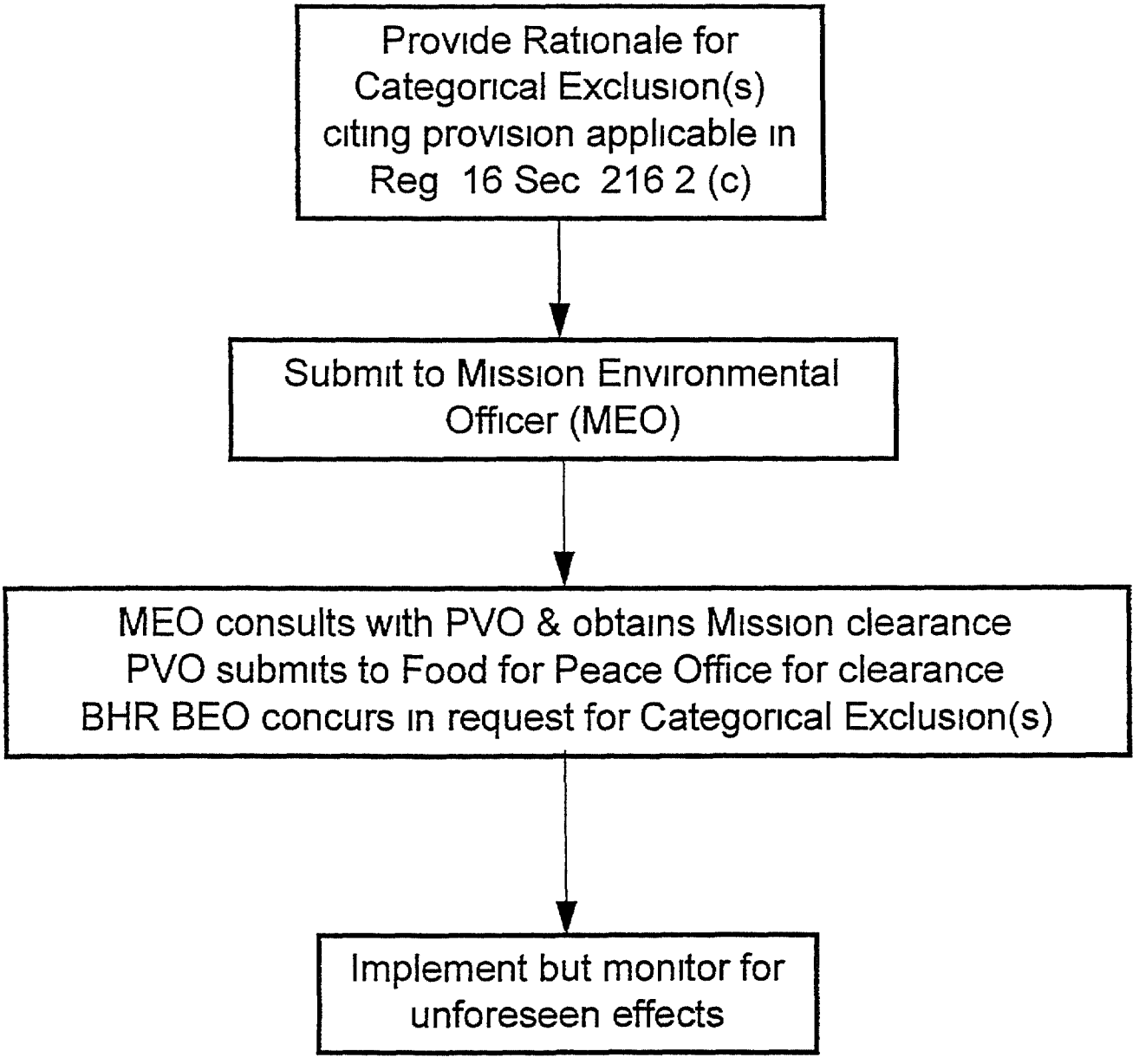
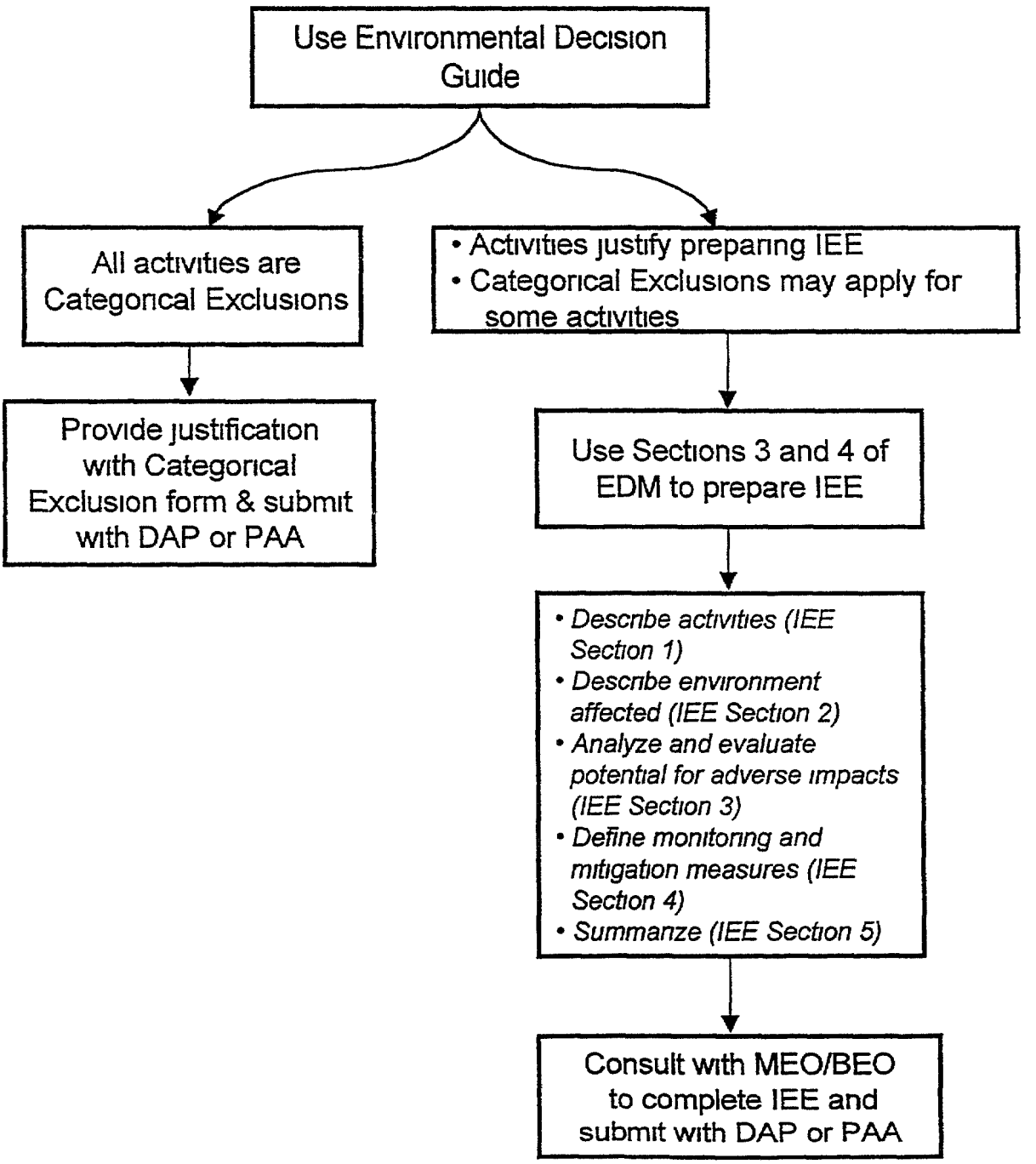


Figure 2 3 DAP or PAA Requiring an IEE, Categorical Exclusions or Both



Section 3

Organizing the Initial Environmental Examination (IEE)

3 Organizing the IEE

You are organizing the IEE, because the results of the Environmental Decision Guide (EDG) (Section 2) led you to conclude that an IEE is needed. If, however, all of your activities fit one Categorical Exclusion or another, go back to Section 2 3 of the EDG and follow those instructions

This section

- describes key steps in beginning, organizing and submitting an IEE
- reviews the options for threshold decisions and determinations in the IEE,
- provides a summary graphic decision tree for the EDM, and
- outlines the step-by-step approach to preparing the IEE

Section 4, **Writing the IEE**, describes how to conduct the analysis required in the IEE narrative, applying fundamental principles and tools of environmental review

3 1 Getting Started on the IEE

You should remember that if, as an IEE preparer you are *not especially familiar* with the implementation of activities and actual on-the-ground detail, you should *consider assembling a multi-disciplinary team of those who do have the knowledge* and can contribute different kinds of expertise

As mentioned at the end of the EDG, if an IEE needs to be prepared, look over this Section and Section 4 to determine what kind of detail you will need Also read the sample IEEs provided in Annex B

Box 3.1. What Is an IEE?

An IEE is a review of the reasonably foreseeable effects on the environment of a proposed action Its function is to provide a brief synopsis of the factual basis for a threshold decision whether significant adverse impacts are to be expected and whether an Environmental Assessment will be required It also identifies the monitoring and mitigation actions needed

Refer to **Figure 2 1** at the end of the EDG to review the key decisions possible in the Reg 216 process

3 2 Steps in Organizing and Submitting an IEE

Five main steps are involved

Step 1 Review the typical IEE situations, discussed below in section 3 3

Step 2 Discuss your approach and ~~any questions with~~ the MEO and Food for Peace Officer

Step 3 Using the tables/list(s) assembled in the EDG (Table 2 2 and/or Table 2 3), gather the information suggested in Section 4 and prepare a draft IEE Consult with the MEOs and BEOs as appropriate The summary table format is convenient and helpful because it can be readily updated and organized as more information is collected.

Step 4 Submit the draft IEE to the MEO PVOs are encouraged to also share a draft of the IEE with

the BHR BEO prior to formal submission to the Mission This will encourage a constructive dialogue and ensure that issues are addressed early The BHR BEO also requests that the CS submit the summary lists/tables to facilitate USAID's review

Step 5 After the Mission (or, for non-presence countries' DAPs, the responsible field office) has cleared, you as the PVO/NGO submit the IEE to the Director, Office of Food for Peace (BHR/FFP) and then to the BHR BEO

3 3 Typical Situations Encountered in Preparing an IEE

You will prepare a "classic" IEE in most cases In your portfolio of activities, you could have more than one of the scenarios or situations described below, but in every case you will prepare one IEE that covers the relevant possibilities

- **Well-Defined Activities and No Significant Effects—Prepare IEE with a Negative Determination**

To prepare a **"classic" IEE**, which is the typical type of IEE, you will need specific information about the activities, including phasing, construction requirements, locations, and design A "classic" IEE requires sufficient detailed information about the discrete activity components **for the full life of the program.** For example, if agricultural interventions are planned, you should determine what type they are, how they work, and specifically where they occur (e g., in villages a, b, and c) You should also have information about the site and setting If, on the other hand, dams or river diversions are planned to irrigate an area, the information you should have would include the design of the dam or diversion, such as height, volume of water impounded or diverted, location of the water source, upstream and downstream characteristics, etc

Multi-Site, Well-Defined Activities Many TII-supported programs carry out specific, well-defined activities in numerous sites across a region or country If there are multiple activities, are they well-defined, repetitive and/or predictable, and are impacts mitigatable by measures readily identifiable in advance? Do you know the sites well enough to determine that no untoward impacts would occur to sensitive areas (wetlands, protected areas, etc)?

This situation is common, for example, in well or latrine construction, terracing, or road rehabilitation, where, at the beginning of a five-year DAP, a PVO may not have identified every specific site, but overall characteristics are known It is not realistic or necessary in such multi-site interventions for a PVO to submit and for USAID to approve environmental documentation for each site-specific activity Rather, the PVO in the example cited should analyze all construction activities, identifying all the mitigation measures that will be taken to ensure that they will have no adverse environmental effects Mitigating measures might include training for local staff, and guidelines to ensure the actions taken have no negative environmental implications (e g , water sources will not be diverted, soil will not be eroded, and protected species will not be endangered, etc) The example of CARE Bangladesh in Box 1 1 (Sect. 1) is worth reviewing Note that while the Bangladesh example has model value, it is a more intensive process than will typically be required for Title II activities

A **negative determination without conditions** indicates that the activity is routine and is expected to

have no significant effect on the environment A **negative determination with conditions** indicates what mitigation and monitoring measures are to be carried out

Two examples of this type of multi-site "classic" IEE for Title II activities are presented in **draft** form in Annex B 4

- **Well-Defined Activities and Potential Significant Effects—Prepare IEE with a Positive Determination or Demonstrate in IEE Why a Positive Determination is not Appropriate**

If sufficient information is available and activities identified in the EDG were found to potentially trigger an EA, but you believe the activities will not cause significant environmental harm, the IEE you prepare should present information that demonstrates to USAID why an EA (positive determination) is not recommended For example, if an activity involves land leveling of one ha (or even up to 100 ha) for irrigation—and recalling that land leveling is a potential trigger for an EA—you will need to give evidence that this modest magnitude of change should not require an EA. The explanation might be that the area is not ecologically sensitive, has no special environmental features (a wetland or a site where wildlife migrates), etc

If you believe an EA is appropriate, the IEE should demonstrate why If the particular hectares were ecologically sensitive, an EA might be needed *The decision to prepare an EA is a matter of judgment, made with the relevant USAID Environmental Officers, who need sufficient information from the PVO in making this decision* If an EA is determined to be necessary, the affected activity cannot proceed until the EA is completed and approved, although normally the other activities in the DAP may proceed once the IEE is approved.

- **Some Activities are Not Yet Fully-Defined—Prepare IEE with a Deferral**

A *deferral* may be appropriate for a DAP or PAA activity or major component when it is not yet fully defined, sufficient information is unavailable, or a decision to pursue an activity is not yet definitive This applies especially when you expect that at least some of the activities are not likely to be considered small-scale The request for a deferral is made within the IEE (see 216 3[a][7]) To do so means that the IEE must be amended as soon as information about that activity becomes available The deferred activity cannot proceed until the deferral in the IEE has been resolved, but other activities with negative determinations may proceed once the IEE is approved.

- **Multiple Activities Not Yet Fully Defined but Mostly Small-Scale —Consider an "Umbrella" IEE Process (see Annex F)**

The ***"umbrella" IEE*** **process** covers DAPs with multiple sets of activities generally expected to be small in scale, and in which at least some of the activities are not yet fully defined or designed at the time of DAP and/or IEE preparation Thus, not enough specific information is ~~available~~ to allow a "classic" IEE to be prepared. An "umbrella" IEE assumes a negative determination with conditions The conditions lay out the environmental steps to be followed as the activities become more completely defined

Note that a "classic" IEE may also specify a negative determination with conditions (see above in Section 3 3 and below in Section 3 4) An "umbrella" IEE may be applicable if

- the DAP consists of multiple activities, most of which are small-scale **but not yet fully designed**, and which can be subjected to a subsequent review process defined by the CS, or

- the CS intends to carry out a subgranting program in which sub-recipients submit proposals for activities (although specific sub-recipients and activities may not yet have been identified) These proposals would normally be linked to a post-IEE environmental review process similar to that described in Annex F

An alternative to the "umbrella" IEE is to **prepare an IEE with a deferral of those activities for which insufficient information is available**, which will then require amendment of the IEE before obligation of funds for, or implementation of, the affected activities

In principle, the advantages of the "umbrella" IEE are that (a) it provides for a CS-Specific post-IEE screening and review process for each activity as the information about the activities is developed, and (b) once the IEE including a process of environmental screening and review has been approved by the BHR BEO, all or most activities can be approved in the field on the basis of local screening and review More information about the "umbrella" IEE is contained in Annex F

3 4 Pointers about Threshold Decisions to Recommend

In the IEE, PVOs will analyze all the activities and come to **recommended** threshold decisions The PVO recommends these decisions to the BHR BEO for approval Note that **a single IEE can contain multiple determinations**, in addition to Categorical Exclusions The key determinations to consider are

- A **negative determination without conditions**, which indicates that the activity is routine and is expected to have no significant effect on the environment (Figure 3 2),

- A **negative determination with conditions**, which indicates what conditions for mitigation or monitoring will be carried out (Figure 3 3) The conditions for an umbrella IEE are detailed in Annex F To reach a negative determination, you must show that there is no significant harm to the environment. Significance is a matter of judgment, based on context and the magnitude of an action (see Section 4, IEE Section 3) The decision to place **conditions** on a Negative Determination depends upon how sensitive the situation is and whether there might be potential for harm, which could be avoided or diminished through the application of certain conditions If there is any confusion or doubt about whether to include conditions, the prudent decision is to select a "negative determination with conditions," then specify good environmental practices and mitigation or monitoring of impacts (see Box 3 2)

- A **positive determination** (significant adverse effects), which indicates the need for an EA or PEA (Figure 3 1), the IEE will make the case for or against an EA (see Section 4 3 if an EA is called for) A positive determination means that the activity could have a significant (adverse = harm) effect on the

environment [11] Once a positive determination is reached, an EA is required. If the activity is one of a kind, then a project-specific EA is suitable If there are many similar activities either within a particular Title II Cooperating Sponsor's program, or where several CSs have similar activities, a PEA might be more applicable Additional information on PEA preparation is provided in Annex C

- A **deferral**, which indicates that a threshold decision and a positive or negative determination cannot yet be reached, because of insufficient information (Figure 3 4)

Keep in mind that you will not recommend determinations, positive or negative, until you have actually assembled the background information and prepared environmental analyses (see Section 4) Box 3 2 provides short examples of types of decisions reached In Annex B, you will find examples of approved IEEs (non-Title II) and draft IEEs (Title II), which give you an idea of how determinations are made in practice

Categorical Exclusions. Parts or components of your activities are likely to merit Categorical Exclusions, based on your use of the EDG and the allowable Categorical Exclusions cited therein (and in Reg 216) and incorporated in Table 2.2 and/or Table 2 3 For example, providing health information or training farmers would qualify as a Categorical Exclusion, but for the farmer training, the IEE would indicate, if appropriate, that training will include principles and practices of environmentally sustainable agriculture **Note that even a DAP or PAA in which all activities are Categorical Exclusions may need to incorporate provisions for monitoring and application of sound environmental principles and practices**

Also see the Summary Decision Tree (Figure 3 5) at the end of this Section for a synopsis of the determination options

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[11] If the activity directly affects the U S , the global environment, or areas outside the jurisdiction of a country, significance is not equated with harm, and U S Council on Environmental Quality definitions of significance apply

Box 3 2 Examples of Environmental Determinations

Example 1 If as part of a health activity, you were building a small health post or some other facility where health care and information were provided, your analysis would need to show that building and operating this facility posed no special environmental problems (e g , no wetlands filled, no habitat for endangered species affected, no unusual erosion or flooding conditions, etc), and that the health post could be built using standard engineering and construction practices Assuming this were the case, the health post would qualify for a **negative determination without conditions.**

If, however, the health post's construction had some unusual siting conditions and the site could not be changed to avoid these conditions (e g , unusual need for slope or soil stabilization, specialized erosion control, or need to divert a drainage course), then a **negative determination with conditions** would apply If this health post were to be testing blood, using syringes, creating biohazardous waste, etc , then a **negative determination with conditions** would also apply The conditions would specify how the adverse effects would be minimized or otherwise mitigated (e g., how biohazardous wastes would be safely disposed of), so as to avoid environmental harm or risks to human health

Example 2. If wells were to be developed, and they were shallow wells in an area with a sufficient aquifer and standard "good practices" for digging wells were to be followed, a simple **negative determination** would suffice The IEE would affirm that the good practices are expected to suffice as mitigation measures, and would identify any other apt measures

If there were unusual conditions, such as the need to use major construction equipment to bore hundreds of feet into the ground, questions about the sufficiency of the aquifer or a potential for saline intrusion then a **negative determination with conditions** related to construction methods or monitoring would likely apply

Example 3 If the activity were on the list that might trigger an EA (e g , application of general-use pesticides, or construction of dams of 50,000 cubic meters capacity), but the scale and magnitude of potential significant impacts could be avoided or minimized because of design, mitigative measures, or monitoring, then the IEE would likely request a **negative determination with conditions** for mitigation and monitoring to ensure that significant adverse impacts would be avoided, i.e , the conditions of mitigation and monitoring would ensure that no potential for significant adverse impacts existed and therefore a **positive determination** would not be necessary

Example 4 If an "umbrella" IEE is used (Annex F), the determination is by definition a **negative determination with conditions,** the conditions being the subsequent environmental screening and review appropriate to the food-aided development programs involved Also normally included would be some environmentally relevant training or demonstrated capacity, mitigation, and monitoring (see Figure 3 4)

See Section 2 for examples of applicable **categorical exclusions** (Sect 2.2.2) and **positive determinations** (Sect 2.2 4)

3 5 IEE Preparation

Suggested steps involved in preparing an IEE are

- assembling the relevant information resources,
- carrying out the environmental analysis,
- writing the IEE narrative,
- settling on recommended threshold decisions, and
- finalizing the IEE Facesheet to attach to the IEE Narrative, together constituting the full IEE

Assembling the Information Resources

Review the Tables you prepared in Section 2 The tables can be organized and updated as information is assembled, and they will help you to organize the IEE narrative

To screen a program or activity for potential environmental impacts, certain information about the community and physical environment at the site(s) will be needed. Some of this information will already have been collected to develop the activity objectives, but additional data will be necessary to identify alternative methods of accomplishing the objectives and to assess their impacts on the environment. It is also recommended that you obtain a copy of the National Environmental Action Plan (NEAP) or equivalent as a valuable source of environmental data.

See Section 4 for more specific advice on what sorts of information will be needed

Steps to Complete the IEE

While the IEE outlines and templates (Annex A) are intended to be self-explanatory, experience has shown that the process is iterative and proceeds as follows

▸ Examine the sample IEE Facesheet and Narrative Outline format

Box 3 3, which follows, illustrates a sample of the Title II Environmental Compliance Facesheet and an outline for the narrative of a "classic" IEE that will comprise the body of the IEE Another set to use as a template is contained in Annex A. You will note on the facesheet, under Summary of Findings, that text should be inserted. This summary text will ideally fit on the second page along with the approval lines The narrative for the IEE will follow the two facesheet pages and will thus begin on page 3 of the full IEE

▸ Begin the IEE Facesheet

Complete part of the facesheet by entering the names of the Program or Activity Title (or DAP/PAA title, if any) and the name of the Cooperating Sponsor and country (or region) Enter information about resource levels and IEE Preparer(s) If the IEE being prepared is an **amendment to any previous IEE**, note this information on the facesheet. Enter the date, being careful not to use an automatic date function because the date will change as the

document is opened, and it will seem to be more recent than it actually is Each time there is a significant revision, change the date to reflect the date of the revision so you can keep track of various versions

Do not enter information under Environmental Action Recommended or mark the Conditions—or prepare the Summary—at this time You need to complete the full IEE narrative first, where the conclusions reached form the basis for the above Facesheet

- Write the IEE Narrative

Write Sections 1 through 5 of the IEE narrative, following the outline shown in Box 3 3 and the recommendations in Section 4, organized according to the outline Section 4 provides guidance on the typical process used to assess environmental impacts

As mentioned previously, writing the IEE is typically an **iterative process** You prepare each section, following the outline to the extent that you have information You may need additional information and have to go back to various sections and add detail or, in some cases, revise your conclusions It is best to jump in and do what you can, then fill in and revise later **Examples are provided in Annex B of approved IEEs for non-Title II programs, plus a few *draft* DAP/PAA IEEs for Title II.**

If the DAP includes several sets of dissimilar activities (e g , natural resources management, road construction, and water resources works), it may make sense to prepare separate sets of environmental analyses -- each organized according to the IEE outline Sections 1 to 5 -- that will contribute to the IEE Then you can use these sections directly, if they are not too long, or summarize them, for the IEE proper

The summary in IEE Section 5 needs to state what environmental determinations are appropriate to which activities or groups of activities

- Finish the IEE Facesheet

Now you can complete the IEE Facesheet by preparing the Facesheet Summary section, based on Section 5, which may need to be shortened to keep the facesheet compact The Summary should indicate what threshold decisions have been reached for specific activities or groups of activities Check the environmental media affected. Record the environmental determinations in the appropriate part of the facesheet and mark the conditions line, if any activities have conditions for implementation, e g , a Negative Determination with conditions

Box 3.3 Title II Environmental Compliance Facesheet

Title of DAP/PAA Program/Activity

CS Name, Country/Region

Funding Period FY_____- FY_____

Resource Levels Commodities (dollar equivalent, incl. monetization) _____
Total metric tonnage request:_____

202 (e) grant: $_____

Prepared by: name _____ Date _____
title _____

IEE Amendment (Y/N): _____ **Date of original IEE** _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply)
air___ water___ land___ biodiversity(specify) _____ human health____ other___ none____

Environmental Action(s) Recommended (check all that apply)

___ 1 *Categorical Exclusion(s)*

___ 2 Initial Environmental Examination

___ *Negative Determination* no significant adverse effects expected regarding the proposed activities, which are well-defined over life of DAP/PAA. IEE prepared
___ without conditions (no special mitigation measures needed, normal good practices and engineering will be used)
___ with conditions (special mitigation measures specified to prevent unintended adverse impact)

___ *Negative Determination* no significant adverse effects expected, but multiple sites and sub-activities are involved which are not yet fully defined or designed "Umbrella" IEE prepared

___ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring

___ *Positive Determination* IEE confirms potential for significant adverse effect of one or more activities Appropriate environmental review needed/conducted

___ EA to be / being / has been (*circle one*) conducted Note that the activities affected cannot go forward until an EA is approved

___ Deferral one or more elements not yet sufficiently defined to perform environmental analysis activity will not be implemented until amended IEE is approved

Summary of Findings
Briefly describe (in 1 or 2 paragraphs) the activities being implemented or proposed justify the reason for the recommended action(s) and cite appropriate sections of Reg 216 as needed For IEEs reproduce here the Summary from Section 5 of the IEE narrative and/or Section 2 of the Request for Categorical Exclusion

Box 3 3 (continued) Sample IEE Narrative Outline to Accompany Title II Environmental Compliance Facesheet (See Annex A for blank template)

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA.
DAP/PAA Program/Activity
CS Name, Country/Region

1 BACKGROUND AND ACTIVITY DESCRIPTION

- 1 1 Background
- 1.2 Description of Activities
- 1 3 Purpose and Scope of IEE

2 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

- 2.1 Locations Affected
- 2.2 Environmental Policies and Procedures

3 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

4 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

- 4 1 Recommended IEE Determinations
- 4.2 Mitigation, Monitoring and Evaluation

5 SUMMARY OF FINDINGS

- 5 1 Environmental Determinations
- 5.2 Conditions

Figure 3 1· Positive Determination. Significant Impact Likely

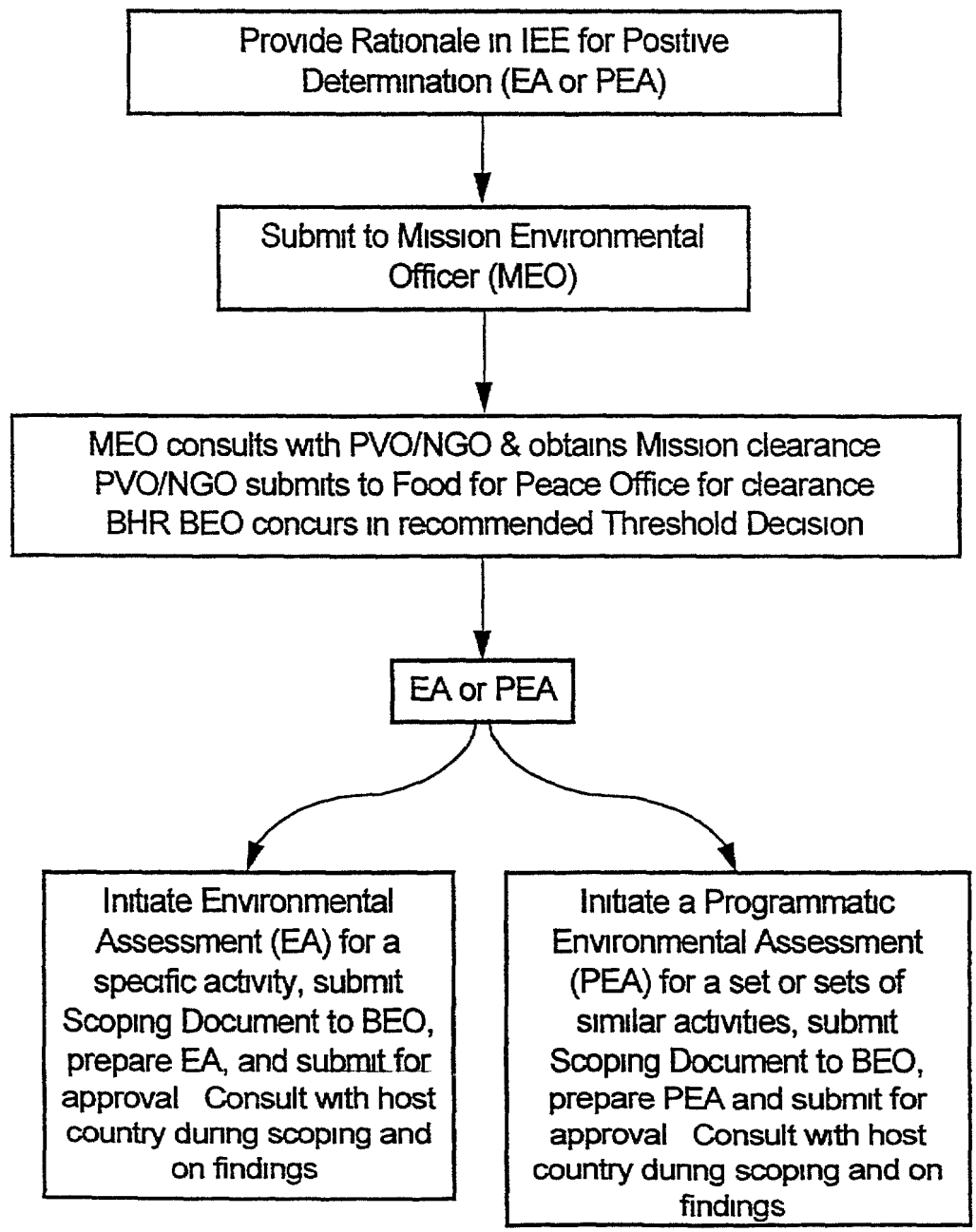


Figure 3 2: Negative Determination without Conditions

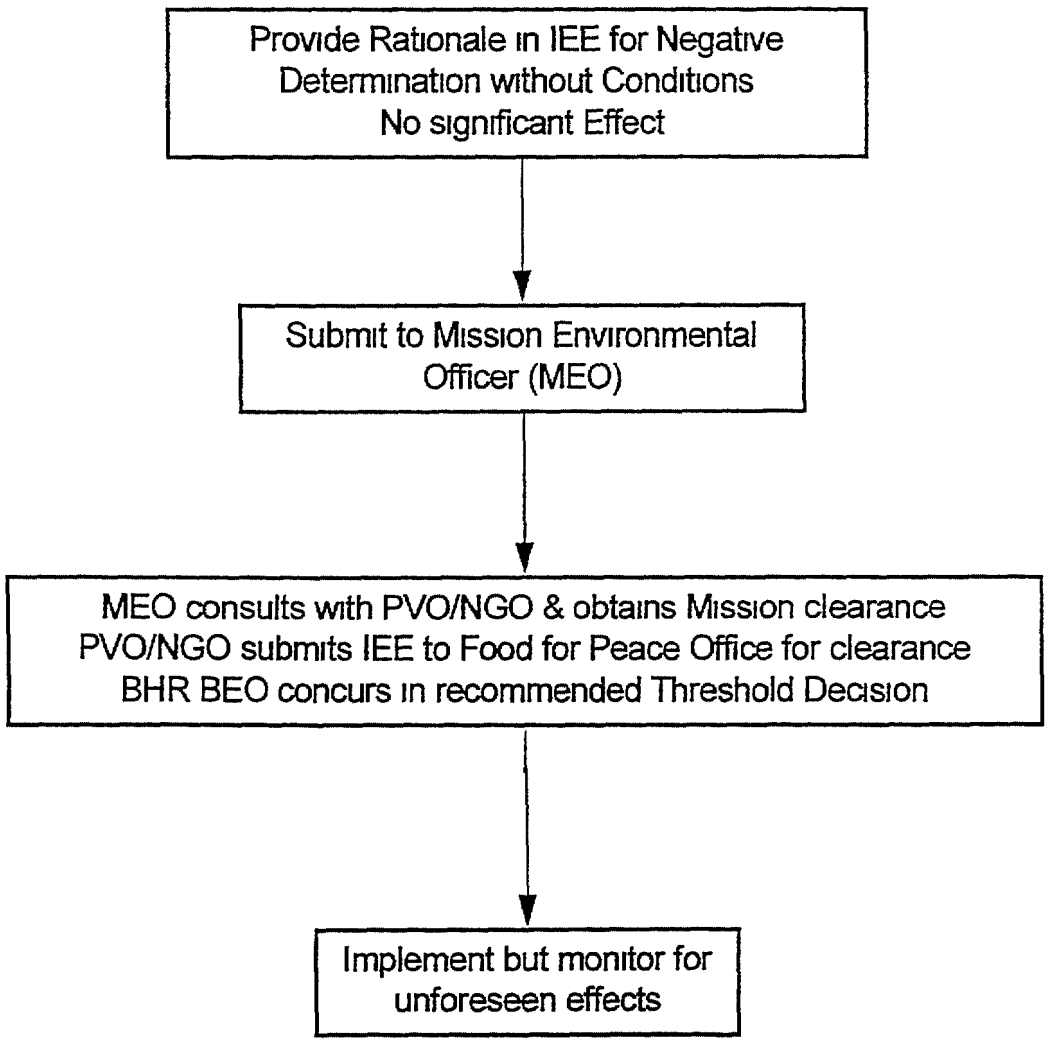


Figure 3.3: Negative Determination with Conditions

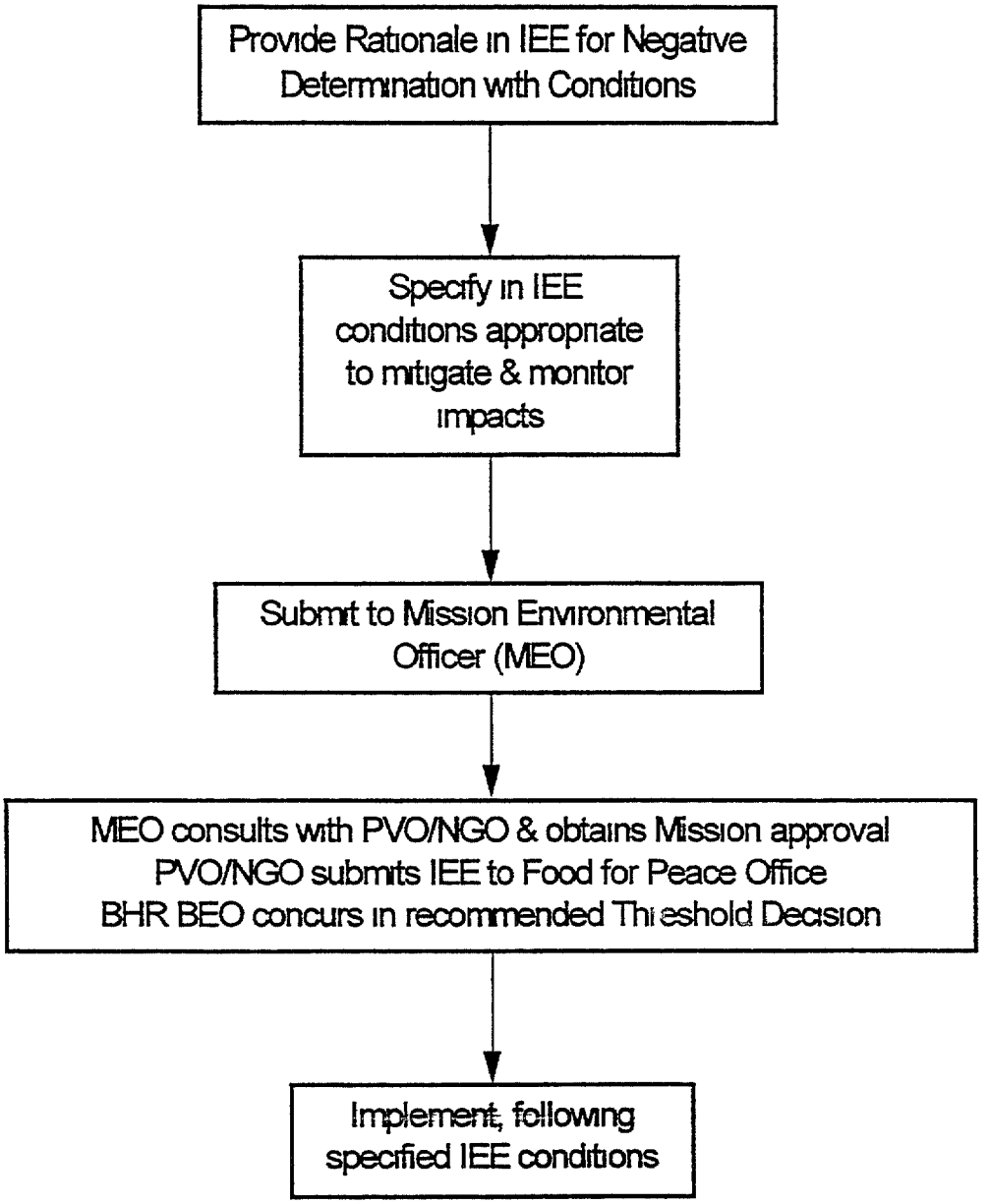
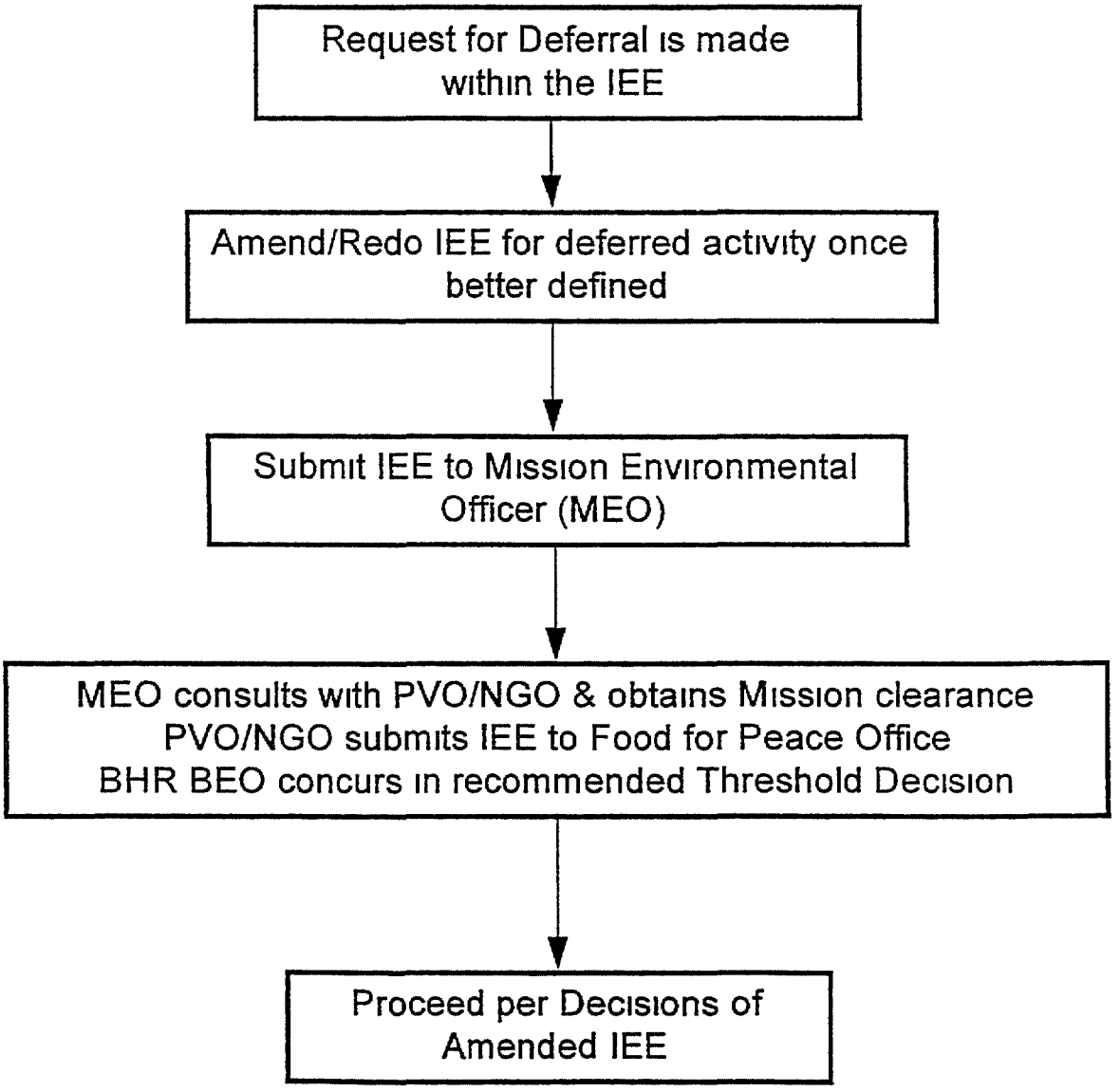


Figure 3.4. Deferral



Section 4

Writing the IEE

Figure 3 5 (continued) Summary Decision Tree for Environmental Documentation Panel 2

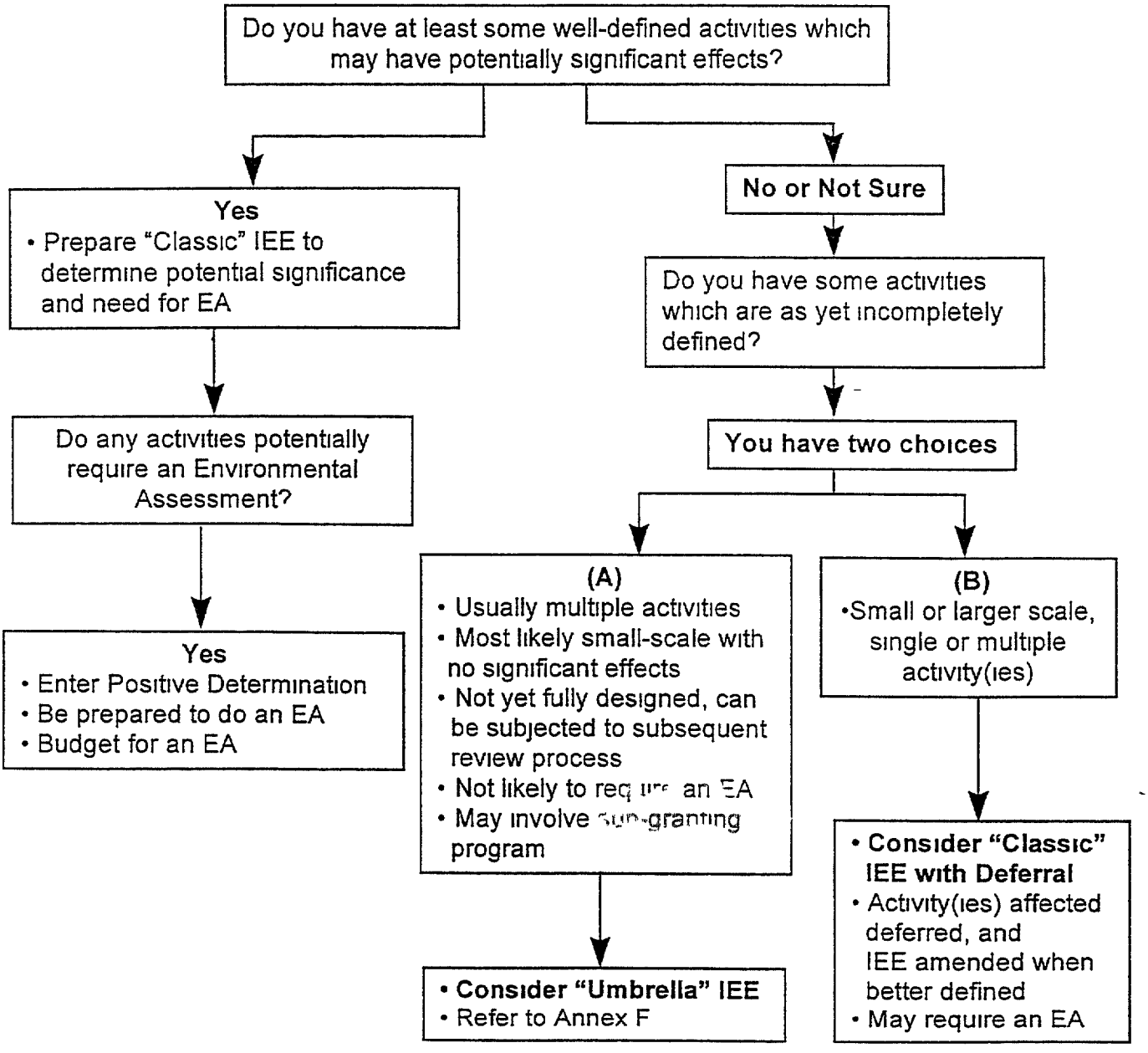
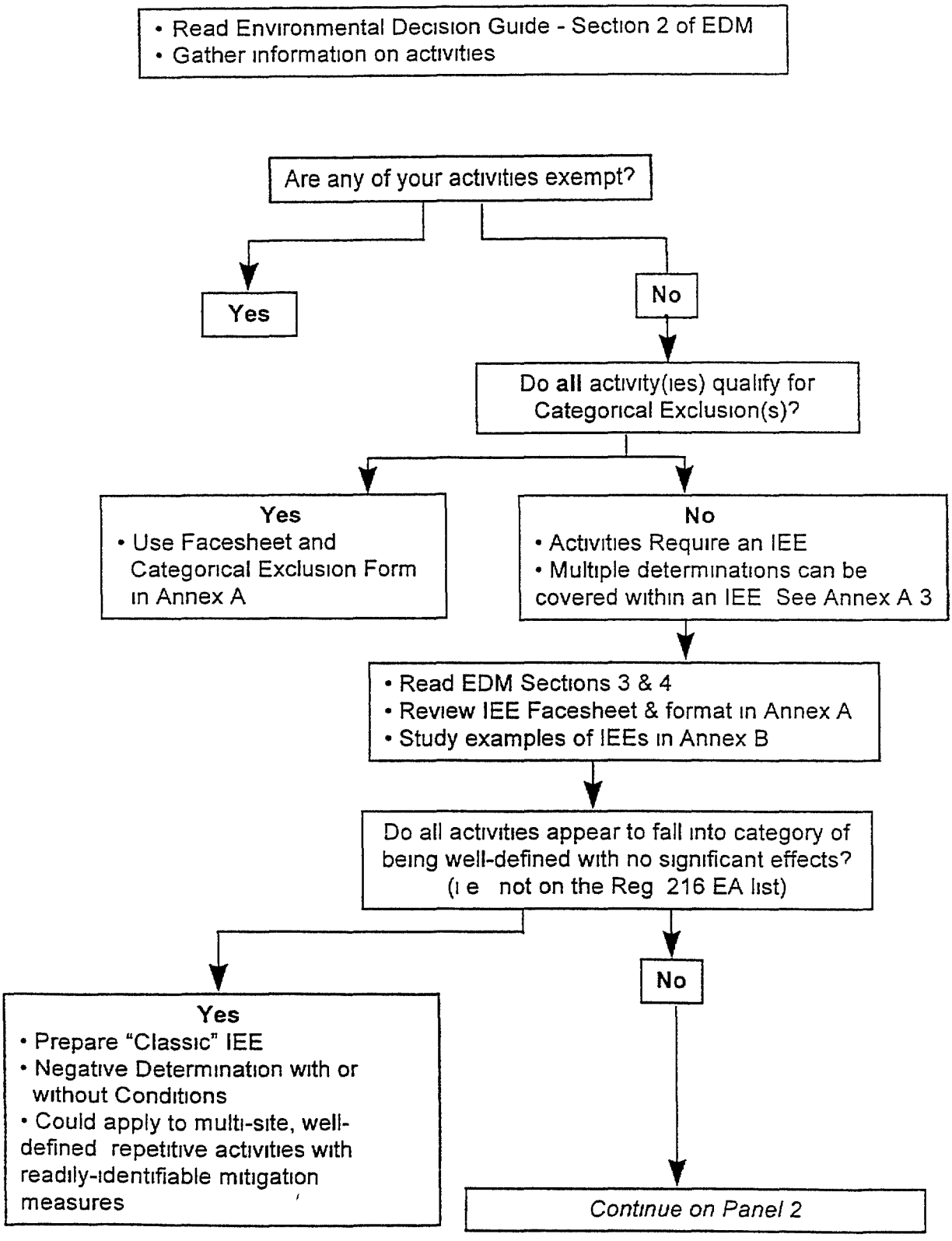


Figure 3 5 - Summary Decision Tree for Environmental Documentation
Panel 1



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4 WRITING THE IEE

This Section helps you do the analysis required to prepare a good IEE narrative The process described here is representative of that applied in environmental review anywhere in the world. Section 4 1 reviews information needs, Section 4.2 is organized under the number and title of each IEE Section. Section 4 3 offers suggestions on what to do if the IEE results in a positive determination and an EA or PEA needs to be prepared. Various tables and boxes provide informative detail and suggested approaches Remember, the preparation of various IEE sections is iterative you will progressively move through the analysis in preparing the IEE narrative, typically return to earlier sections, make additions and revisions, and then make determinations

If you have several sets of dissimilar activities, you may wish to use this section to prepare an environmental analysis that parallels the narrative outline for the IEE for **each** set of activities, and then use these to prepare the IEE itself.

4 1 Addressing Information Needs

Locate key sources of background data. Potential sources of existing information about the environment and natural resources include

- Host country counterpart agencies, such as the Ministry of Agriculture or Forestry, or local agricultural extension workers, universities, or training centers,
- Direct observation during a site visit and contact with counterparts, villagers, farmers, and residents,
- NGOs, consultants, and technical experts,
- National-level documents, such as the Conservation Strategy for Sustainable Development (IUCN sponsored), National Environmental Action Plan (NEAP), National Report on Environment and Development prepared for the United Nations Conference on Environment and Development (UNCED) held in Rio in 1992, or the Tropical Forestry Action Plan,
- USAID Environmental Sector Assessment (sometimes referred to as an Environmental Threats Assessment) or Biodiversity Assessment (in place or likely in process),
- Geographic Information System (GIS)[12] databases (consult Ministry of Environment or Natural Resources or equivalent)
- FAO (which has supported international soils and water resource inventories in many areas)

Note You will not be able to acquire all possible sources of information for the IEE Be selective and judge what you think is most useful, e g , the NEAP and related documents if there are protected areas that could be affected directly or indirectly by your proposed activities

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[12] Geographic Information Systems provide digitized computerized map data, often on subjects such as land use, drainage, climate, vegetation, or soils Overlaps of several themes can be made

- ***Useful socio-economic and cultural information***

To understand the context of your interventions, you need information on local culture, socio-economic conditions, and gender relations in the areas of your proposed activities Without this understanding and the participation of the local population, your activities' sustainability will be questionable Sources of such information include direct observation, local counterparts, local farmers and villagers, and local NGOs Boxes 4 1 and 4.2 highlight the need for participation and the importance of taking environmental justice into account in the information gathering process

By **incorporating gender and other social variables in design and environmental analysis**, development programs will be more effective and sustainable Gender-disaggregated data should routinely be collected where appropriate This information can be useful as baseline for monitoring and evaluation purposes

For example

- In the case of increased agricultural crop production, be sensitive to the fact that women and men have different relationships to specific resources, and this relationship affects resource access and use Which farmers are responsible for what? Is it appropriate to ensure that all farmers receive training in the new technology? How will you choose the farmers? During training is a good time to consider the different social variables that might have an impact on the environment.

Box 4 1 Quick tips on how to promote a participatory process

- Work with organizations established in the local community
- Participation must be facilitated It won t just happen by calling a meeting
  - Be attentive to meeting times and suitability of places for women to attend
  - Provide gender training to the PVOs and NGOs who will be working at the local level
- Work with entire families
- Ensure that communication skills, discussion and methods of inclusion are appropriate for the community in which you are working

- For agricultural extension and demonstration of improved practices, determine through a participatory process whether those involved agree that the technology can be expected to work. What would be the anticipated draw-backs? Will they use the new techniques, if not, why not? Again, who selects the farmers and how?

- In providing agricultural credit, will all farmers benefit, or mainly those who own (or farm) the land? If it is in a region where credit is tied to ownership and women farmers cannot own land, can provisions be made to benefit them?

Box 4 2 Environmental Justice

Environmental justice concerns

- inequities or disproportional adverse environmental impacts affecting low income populations or various disadvantaged groups (depending on the context: ethnic groups, indigenous populations, minorities and women),
- adverse effects on populations that depend on subsistence consumption of natural resources or those who have traditional livelihoods, e g , pastoralists who depend upon rangeland proposed for irrigation,
- population groups that face higher health risks because of exposure to environmental hazards created by nearby project activities, and
- segments of the population whose health is differentially affected by exposure to environmental hazards or changes in environmental baseline conditions

Environmental justice means one should aim to promote enforcement of environmental and health statutes or application of such standards in areas with disadvantaged populations The participation of affected groups needs to be encouraged so that potential adverse impacts can be identified and mitigation strategies developed by those most knowledgeable about the local setting and existing environmental conditions

(Adapted from US Executive Order 12898, February 1994)

Importance of maps

Maps can be especially valuable in activity design and implementation, as well as in preparing the IEE They should be of sufficient scale to show roads and villages, targeted rivers and streams, and topographic features (e g., 1 50,000 or 1.25,000 or better) Compare information about the setting with maps or plans of your activity to assess how the geographic area may be affected by your proposed action Be careful when comparing maps of different scales

Maps will help you visualize whether or how various resources or areas overlap with your area of intervention Often you will not have a precise indication of areas of overlap, but you will be able to see potential areas of conflict that need to be investigated further Development and presentation of environmental information in map form can be done manually with transparent overlays Computer-generated maps or Geographic Information Systems (GISs) can be used to present multiple features from a variety of sources You may even wish to consider providing maps as attachments to your environmental documentation

4 2 Assembling the IEE Narrative

Following are suggested approaches to the IEE narrative preparation Treatment is by section of the IEE

IEE Section 1

- Background
- Description of activity(ies)
- Purpose and scope of IEE

✔ **IEE Section 1 Background and Activity/Program Description**

In Section 1 of the IEE, you should provide the background rationale for and description of current and/or proposed activities and the purpose and scope of the IEE Use the background subsection to discuss briefly how your activities fit into the Mission and/or the host country strategy or program or to highlight other contextual information that should be brought to the attention of an IEE reviewer Use the subsection on "purpose and scope of the IEE" to note if this is the first IEE being prepared for the DAP or PAA, an amendment, or if certain activities are not being covered, e g , they are expected to end in the near future

Under IEE subsection 1.2 on activities consider the following What does it mean to describe an activity for an IEE? The organizational framework is up to you Determine how you wish to organize and group activities in a logical or coherent fashion If your DAP or PAA is organized as a Results Framework, you may find that method of organization most convenient You may prefer some other logical grouping of activities, geographically or by sector

What is the definition of an activity? In this manual, "activity" refers to the desired accomplishment or output such as a road, seedling production, forestry planting, or river diversion to irrigate land An activity is independent, although it may be linked to other activities Accomplishing the activity will require certain actions, such as planning and design, construction (clearing, digging, filling, transporting materials or even establishing a construction workers' camp) Other actions occur during operation or implementation (vehicular traffic patterns once a road is constructed, water management once irrigation infrastructure is in place) Most activities also need maintenance Analysis of impacts requires that you know what all these actions are These discrete actions, the inputs to accomplish the activity, do not, however, require separate Reg 216 determinations The activity as a whole typically is the subject of the Reg 216 determination

For each grouping (e.g., by type of intervention or Intermediate Result), try to provide information about the activities, including background and description of major components You do not need to justify activities (this is covered in other parts of the DAP or PAA) You do, however, need to provide some physical detail and be as quantitative as possible For example, "about 500 farmers will be trained in irrigated agriculture for one week each, four farm-to-market roads will be built in such-and-such locations with respective lengths of a, b, c, and d kilometers with a construction period of approximately four months during the dry season, and estimated vehicular traffic of about 20 small trucks or vans and 10 autos per day "

Key Questions to Consider You are not expected to answer the following questions as such in the IEE Instead, they are provided to stimulate your initial thinking on potential impacts, which you will report in Section 3 of the IEE Based on your answers to the questions below, develop a description of each activity and the components or specific actions needed to achieve desired results Keep in mind the various phases of an activity, e g , planning and design, construction, and operation

- *Why is the (proposed or current) activity needed, and are there alternatives?* Have the alternatives been evaluated? If so, the IEE should indicate why the particular activity was chosen If no alternatives have been considered, are there any, what are they, and should they be considered?

- *Why is the activity the best or most feasible?* Why is activity "x" the best or the most feasible way to accomplish the goal? For example, if increased income is the ultimate goal, why is small-scale irrigation (or aquaculture or micro-enterprise) the chosen activity? What other planned or potentially necessary activities are linked to the activity under consideration? The planned intervention may be necessary to accomplish the goal, but is it sufficient? For example, if vegetable production were to increase, is the road adequate to transport it to market?

- *Does the activity have a history?* Is there some important history to the activity? For example, fish farming may have been tried before, but failed. Perhaps the community being assisted was relocated because of another project, etc What was its previous experience? Does the activity involve rehabilitation of a previous investment (e g , terraces)? It may be important to know why rehabilitation is proposed. Was rehabilitation expected and planned for in the original design? Was the prior design incorrect or inappropriate? Was maintenance neglected or improperly carried out? If faulty design or lack of maintenance is provoking the rehabilitation, how will these problems be avoided in the proposed new activity?

- *What are the results?* Distinguish between the physical reality (a school or a well constructed) and the ultimate result (potable water or education)

- *What would happen if the **no action alternative** were chosen?* The answer is **not** that things would remain the same For example, without the proposed activity, adverse environmental effects might occur, because the proposed activity enhances environmental quality or halts environmental destruction A rehabilitated road with proper drainage may pose fewer long-run environmental impacts than a deteriorating road that is eroding away

- *What actions over time need to be considered, and where?* Consider the various components of your activity and what actions will be taken during the planning, design, construction, operation, and potential phase out or abandonment (end of useful life) of these components **Are various locations involved?** For example, if you are building or rehabilitating a road, material from a distant quarry may be needed during the construction phase Consider constructing a table, based on Table 4 1 Use the table, if convenient, and review the additional questions listed below to help you understand the activity and its components from the IEE point of view

- *What actions will be taken during the **planning and design** phase?* For example, do samples need to be taken to do siting, should an engineering survey be undertaken? Would the proposed activity prompt people to move to or away from the site in anticipation of the activity happening? While planning and design work does not usually affect the environment or human behavior, sometimes it does Or sometimes a decision made in this phase is not reversible If your activity has such characteristics, note how and why

Table 4 1 Activity Action List By Location and Phase

List Actions Needed to Accomplish Activity or Its Components	**Locations (list where actions occur—a site, village, district, region, nation, or larger area, as appropriate) Headings below are illustrative You choose the range of geographic units appropriate**				
Project Phases\Locations	Village	Ward	District	Nation	Other
Planning/Design					
Construction					
Operation					
End of Useful Life					

- *What actions will be taken during **construction or clearing**?* Is a construction camp needed? Where will the labor come from? Does an access or haul road need to be constructed? Is quarrying needed to obtain construction materials or is a borrow pit for earth fill needed? What other construction materials are needed (wood, bricks, etc) and where will they come from? If earth or vegetation is removed, what will be done with it? How will erosion be controlled? If new plantings are proposed will these be indigenous? Do utility pipes need to be laid? What social impacts may result during this phase?

- *What actions occur during **operation**?* What inputs are needed, including raw materials, water, or energy sources? Where will they come from? What products are created and where do they go (export, autoconsumption)? Are waste products created and how are they disposed of? Is traffic generated? What routine maintenance and repair activities are needed, and what inputs, (e g , material, labor, transport) will this require? What social impacts may result during this phase?

- *Is planning for **end of useful life** pertinent?* If the activity were to cease (no longer needed or no longer funded) or its useful life were over (reservoirs silt up, mines become exhausted, nuclear plants are decommissioned, etc), does it just disappear? What is left behind and what characteristics do the "leftovers" have?

IEE Section 2

- Locations Affected. Describe environment (including physical, biological, health, socio-economic, and cultural aspects) of the proposed activities' locations
- Environmental Policies and Procedures

Note Organize this section by location or activity, whichever is most convenient.

✔ **IEE Section 2 Country and Environmental Information**

In this section, you are describing the environment (physical, biological, socio-economic and cultural) in which activities, and the specific actions needed to accomplish these occur It is standard practice in most countries and in most documents that assess environmental impacts to consider people and the socio-economic and cultural characteristics of the affected environment. *Although USAID regulations define environment as the natural and physical environment, experience demonstrates that an IEE needs to consider the human factor* Some impacts may be beneficial for one segment of the population but adverse for others (e g., women versus men or rich versus poor) Indigenous populations, different ethnic groups, and the economically inactive portion of the population (the elderly and those not yet of working age) may either benefit from an activity or be adversely affected in different ways from other groups

You will need to determine first how you want to organize this section It may be appropriate to adopt the same organizational framework you used in IEE Section 1, presumably by sector, type of activity or Intermediate Result, and to describe the environmental situation appropriate to each. For example, suppose rural health activities occur in the same general area as road rehabilitation activities In this case, you may want to describe the baseline situations for rural health and then refer back to this description for roads In some cases, it may be easiest to use geography as the organizing framework.

Environmental baseline information could, in some cases, be similar to or the same as information in the sponsor's monitoring and evaluation framework. Similarities or differences between the environmental baseline

and the baseline for measuring activity results will depend on the nature of the results expected and being tracked All such baseline information, whatever the source or reason for collecting it, will be useful in determining long-term sustainability and in developing environmental mitigation and monitoring strategies As noted earlier, people are part of the environment, and their interactions are the key issue under consideration, which is the case for most Title II development activities

Locations Affected and Trends. Try to gain a picture of overall development issues and prospects for the area of concern In so doing, you are trying to determine the future no-action alternative (the baseline situation in the future, as it will be shaped by trends, growth, further degradation, improvement in water or air quality as regulations are developed and enforced, normal environmental change, etc) The impacts of your actions are measured not against the existing situation but by using the yardstick of the future—the future context in which the actions will occur If no clear trends exist, you may have to consider the existing situation to be the best approximation you have of the future For example, if you are building a road through a forested area that has already been targeted for cutting and for development in the next four years, how much does it matter that the road will result in loss of vegetation? Can you estimate the population of the area 25 years from now? Fifty years? What would be the potential impact of the projected changes on the natural resource base?

Look at Box 4.3, which describes Major Categories in a Baseline Study, to determine what features you should describe or about which you should acquire data. Determine key characteristics and key data needs You construct the description of the environment pertinent to your activities as you see fit

You are not necessarily expected to answer the questions posed below Once again, these questions are provided to stimulate your thinking and to encourage you to consider potential impacts, which you describe in Section 3 of the IEE

What else is happening in the activity locations?

- Are roads being built or rehabilitated by others?
- Are there other projects operating or about to start-up?
- Has this area been identified as a growth area?
- Are there plans for power development or extension of electricity?
- Are there resources (e g , mineral or biological) that will likely be exploited (mined, extracted) in the foreseeable future?

Environmental Policies and Procedures Describe briefly the host country's environmental impact assessment policy, legislation or procedures and whether the host country will require environmental documentation Note any applicable policies or regulations for wildlife protected areas, wetlands, historic or archaeological sites and the like

Remember

- You are not writing an environmental encyclopedia! Provide only baseline information needed to assess the potential environmental effects of your proposed activities

- Be guided by national environmental policy or Environmental Action Plan(s) and by the special or unusual characteristics of the locations affected. For example, in one country, genetic diversity and maintenance of indigenous crop varieties may be important, in another, preventing land degradation or

Box 4 3. Major Potential Impact Categories in a Baseline Study (select and focus as appropriate to your activities)

- **Location**—characteristics of locations political/administrative unit (taxing or lack thereof or other social and political characteristics may be relevant), physical and ecological setting (mountains, floodplain, coastal zone, desert; and, humid, seasonal variations, drought cycles, or the like), features of a specific site (steep, flat, vegetated how, and so on)
- **Land Use**—existing patterns of land use in region, regional planning for future use, zoning
- **Geology**—geological provinces, bedrock formations, history of geological stability or instability
- **Topography**—general topography of region, specific topography of project area
- **Soils**—soils mapping, soil series properties, constraints to development
- **Climate**—temperature, cyclical precipitation patterns, cloud cover (identifying, where feasible historical trends and seasonal and long-term variability)
- **Groundwater Resources**—nature of water-bearing formations, recharge rates, sustainable safe yields, locations and depths of existing wells, quality
- **Surface Water Resources**—drainage basins and sub-basins, named and unnamed water bodies and watercourses, regulatory classification of water bodies, flow regimes, water quality data and evaluation, identification of existing permitted discharges to surface waters
- **Terrestrial Communities**—spatial arrangement of vegetative community types, vegetative species-abundance listings, wildlife species-abundance listings, records of threatened and endangered plant and animal species
- **Aquatic Communities**—nature of aquatic habitats, species-abundance listings for aquatic macro-invertebrate and fish communities, ecological indexing of community data
- **Environmentally Sensitive Areas**—identification of protected areas and biodiversity issues wetlands, flood plains, steep slopes; stands of mature vegetation, aquifer recharge areas, areas of high water table, areas of rock outcrop, prime agricultural lands, and mines
- **Agriculture**—cropping patterns, irrigation, soil fertility and water conservation practices, pest management practices, pesticide use
- **Infrastructural Services**—nature and status of human services such as police and fire protection, hospitals, schools, utilities, sewage, water supply, solid waste disposal
- **Transportation**—layout and function of existing roadways, railways, airports, existing and projected capacities and demands
- **Air Quality**—regional quality and trends, data from local monitoring stations, reports of standards exceeded
- **Sound Levels**—existing sound levels, sources of sound
- **Demography**—census or population estimates, recent trends and projections for future population
- **Socio-economics**—economic and social structure of communities, land tenure, tax rates, characteristic types of development
- **Human and Livestock Health Hazards**—potential for enhanced risk of injury, malnutrition, non-communicable disease and occupational hazards, communicable diseases such as diarrhea, and transmission of vector-borne diseases such as malaria, schistosomiasis, sleeping sickness, onchocerciasis, and on livestock, Nagana, tick fever, heartwater, Rinderpest
- **Cultural Resources**—location and characterization of identified cultural resources (archaeological, historical, cultural, landmark), potential for unidentified resources in project area

- soil erosion may have special value
- Consider what is ecologically or culturally unique, unusual, or sensitive Consider what regulations or laws might apply For example, are there special prohibitions on building in or filling wetlands?
- Obtain some information about all the locations associated with each activity and its related actions, as noted in IEE Section 1 above For example, if a project or activity requires an access road or a utility line to a site or a borrow pit, relocation of families to another place, off-site disposal of waste, etc , it may be appropriate to describe all locations that will be affected by the proposed activities

✔ IEE Section 3 Evaluation of Activity/Program Issues with Respect to Environmental Impact Potential

IEE Section 3

- Describe impacts for each activity, using the same organizational framework you adopted for IEE Section 1
- If an activity has no potential impact, or a component may be a categorical exclusion, briefly note this

Identifying potential impacts requires application of science and art Although scientific methods should be used whenever possible, there are often limitations due to inadequate data, complex relationships, and limited time and resources Therefore, seeking the input of knowledgeable local experts and applying informed judgment are essential, where these are lacking, simple analysis and logical reasoning are useful

You are advised to adopt the same organizational framework for IEE Section 3 as you adopted for IEE Section 1, so that reviewers can easily refer back to the activity descriptions

- ***Construct List of Potential Impacts***

You may wish to use one or more simple *checklists* to help you identify potential environmental impacts Sample checklists are found in Annex E In addition, Section 3 of the Africa Bureau *Environmental Guidelines for Small-Scale Activities* provides a sectoral list of questions and pointers to help identify possible impacts of specific activities No checklist is perfect. Each is meant to help stimulate good thinking and planning about your activities Checklists offer the advantage of simplicity for gathering and classifying information necessary for assessing environmental impacts The technique is a structured way to help you begin to organize information, identify potential environmental impacts, think about possible mitigation options, and make tentative conclusions on the extent of environmental impacts

Also consider using a "Project Impact Matrix" or "potential impact network" (see Annex E for examples) as a means of organizing your thoughts Typically such a matrix has the various environmental components affected by the activity listed across the top For each of these environmental components, you indicate if some input action during planning and design, construction, operation, and cessation of useful life could affect one of the environmental components

Look again at the *Environmental Guidelines for Small-Scale Activities* or other references. Many of the concepts considered here are treated in more detail there, either by sector or in a procedural manner in Section 5 1 of the *Guidelines*

Go back to Table 4 1, which organizes activities by phase (planning, construction, operation, end of useful life) and bear in mind the characteristics of the environment you noted in IEE Section 2 For each action, determine how this activity might affect some environmental component, e g , aquatic ecology, soils, topography, water quality, flora and fauna, etc You will need to focus on issues of importance It is not always easy, even given the right data, to appreciate the various and often subtle ways in which certain project activities can affect the environment

- *Identify and Consider the Implications of Classes of Impacts*

  - Using the information you developed for Table 4 1 and the description of the affected environment (from items in Box 4 3), determine what types or classes of impacts may apply, as defined below

  - Determine direct impacts first, e g , clearing land means loss of vegetation A new or improved road means new or additional traffic

  - Consider the *implications of each direct impact to arrive at indirect or induced development impacts* Indirect impacts are caused by the action, but two, three or four steps down the line from direct impacts, occurring later, or in different locations

    As an example of indirect effects (a chain of impacts successively farther removed from the project area itself), consider the hypothetical case of a dam, which could result in reduced water flow downstream contributing to increased vegetation growth, which then tends to support denser populations of aquatic snails (some of which are vectors of schistosomiasis) leading to potential for increased incidence of schistosomiasis in the affected population The health aspects of environmental assessment clearly need to be taken into account (see References in Annex H, e g , World Bank Environmental Assessment Sourcebook supplements)

  - Use the literature available to see how you might link direct impacts to secondary, tertiary impacts, etc For example, does development of a site mean that more people are attracted to an area, resulting in population growth, or will the clearing be so extensive or in such a sensitive zone that an important habitat will be destroyed.

  - Distinguish between short-term, or temporary, and long-term impacts Although construction-related impacts are often short-lived, some impacts may occur during construction that are long-term with permanent implications, e g , construction activities that alter the hydrology of a wetland.

  - Distinguish beneficial impacts from adverse impacts, recognizing that where human groupings are concerned, impacts beneficial to one group may be adverse to another

  - Consider the ***potential for cumulative impacts***—those impacts that result when the impacts of your actions are added to the existing situation and other reasonably foreseeable actions regardless of what organization or agent is undertaking them. Cumulative impacts can result from individually minor but collectively significant actions over a period of time This is particularly the case in countries with severe population pressures on land, water and energy resources Area-wide environmental management plans and environmental analyses are therefore becoming increasingly important in mitigating adverse cumulative effects You probably will not be able to mitigate the effects of activities for which you are not responsible Nevertheless, where feasible, you should try to **coordinate your activities** with others, help others to recognize potential impacts of their activities, or play a role in fostering an environmentally sound overall development plan

  - Consider what you said about the future context of the activities, i e , the future no action alternative **Compare** the expected impacts to that, not just the current baseline situation

- ***Predict and Characterize Potential Impacts***

Identify the nature of the changes in environmental conditions that are caused by the proposed action Doing so requires an understanding of *cause-and-effect relationships* Environmental impacts will have a number of distinct, but linked, characteristics, which should be considered to give an overall picture of the anticipated changes due to the project. Use the list in Box 4 4 to help predict potential impacts In using the list of impact descriptors, consider especially effects on human groups Also consider gender equity Who is affected by the magnitude, direction, extent, duration, or frequency of impacts? Try to make your impact indicators as quantitative as possible Define your terms for the reviewer and try to avoid words like minor, moderate, major, etc

It is a good idea at this point to compare the impacts of the proposed action with the no-action alternative[13] and the other alternatives to the proposed action If the proposed action seems to have the biggest set of adverse impacts, *consider other alternatives* to the proposed project If you find there are many impacts, consider alternatives such as reducing the size of the activity, changing its site or substituting another activity that could achieve a similar objective (Note One can identify alternatives that have less impact, e g , mitigate certain impacts as well as identify a set of mitigative measures for each alternative See IEE Section 4 for more ideas)

- ***Judge the Significance of Impacts***

Significance of a predicted impact depends on its *context* and *intensity* **Context** varies with the setting For example, the loss of one hectare of park in an urban setting may be more significant than the same quantitative loss in a more rural setting, unless that hectare is habitat for an endangered species (or belongs to you!) A new or rehabilitated road in an urban area could be far less significant than the same road in a remote or wilderness setting **Intensity** depends on the degree to which an action

- affects public health or safety,
- affects unique characteristics of an area (culturally, archeologically or historically important resources, parklands, prime farmlands, wetlands, wild and scenic rivers, ecologically critical areas, etc),
- is likely to be highly controversial,
- is highly uncertain or involves unique or unknown risks,
- establishes a precedent,
- adversely affects nationally defined historic places,
- adversely affects endangered or threatened species or habitat and the like, or
- is irreversible

Thus, determining "significance" involves a judgment, tempered not only by applicable national or international laws protecting the environment, but also by societal perceptions of importance One way to judge significance is by considering the specific USAID or host country regulations, international conventions, or policies that say "x" is significant, or where standards exist that are not to be contravened.

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[13] It is important to stress the role of the no-action alternative because it serves as a baseline against which other alternatives can be measured When the environmental consequences of the other action alternatives are weighed against their projected benefits, the no-action alternative can sometimes be the best one

Box 4 4 Typical Descriptors of Environmental Impact

Typical descriptors used in identifying potential impacts include.

- **Magnitude** the absolute or relative change in the size or value of an environmental feature Uncertainty is likely in forecasting the magnitude of change, and some upper and lower estimates may need to be given
- **Direction:** the impact can represent a beneficial or adverse change in general Therefore, it is important to know the direction of the impact as the beneficial impacts are welcome Adverse impacts are of most concern in environmental analysis Nevertheless, impacts beneficial to some groups may be adverse for others.
- **Extent:** the area affected by the impact—e.g , in hectares of productive agricultural land or kilometers of river Distinction here between on-site and off-site impact is useful
- **Duration:** the time period over which the impact will be felt. Some impacts may be very short- term (i.e , during construction), some may occur over a number of years, and some may be permanent. It is often desirable to specify duration in terms of short-term (i e , one year or less), medium-term (i.e , one to ten years), and long-term (i.e , more than ten years)
- **Frequency.** refers to the return period for impacts that tend to recur over and over again—e g , erosion associated with floods, loss of vegetation and soil cover associated with drought or fire, seasonal air quality problems, etc Categories of return period can often be used to advantage in specifying frequency (e g annually or less, one to ten years, ten to 100 years)
- **Reversibility:** refers to the permanence of the impact. Several distinctions are possible here Impacts may be reversible by natural means at natural rates, or be reversible by various forms of human intervention at reasonable costs Others may be, for all practical purposes, irreversible Irreversible impacts are likely to be more severe, because they assume permanent damage to the environment.
- **Likelihood of Occurrence** the possibility of a particular impact occurring as forecast. Here, an estimate is made about how certain the impact prediction is, given the limitations of environmental science Again, establishing categories of analysis such as definite, probable, and possible may be useful if they are well-defined Sometimes this is referred to as the **risk** of an impact occurring

IEE Section 4

- Decide on threshold recommendations
- Describe mitigation, monitoring and evaluation measures

- **IEE Section 4. Recommended Mitigation Actions (Including Monitoring and Evaluation)**

4 1 Recommended IEE Determinations

Organize this section to correspond with the organizational format chosen for IEE Sections 1 and 3 In this Section, you should conclude, on the basis of the information presented in the other Sections, what determinations you recommend for each activity or major component, e g , what qualifies for a Categorical Exclusion, a Negative Determination (with or without conditions), a Positive Determination, or a Deferral Review again the options for determinations in Section 3

- Categorical Exclusions must be consistent with one of those listed in Reg 216 (see Section 2, the EDG)

- Negative Determinations with or without Conditions must be supported by information that allows reviewers of the IEE to conclude that no significant (adverse) impacts of the actions associated with an activity will occur This conclusion is based on the reviewers' concurrence that either there are no impacts, if there are, they will be mitigated, or effective monitoring will be incorporated in the activity or program so that adverse impacts will be identified and mitigated before they become significant Note briefly what mitigative measures and monitoring are considered "conditions " You will be able to expand on these in IEE Section 4 2

- Positive Determinations will lead to an EA or PEA, in which more detail about the activities, actions and range of effects will be studied. Again, for Positive Determinations, early consultation with your MEO is recommended

4 2 *Mitigation, Monitoring, and Evaluation*

The generic outline for the IEE indicates Mitigation, Monitoring, and Evaluation as one section You can discuss the three topics together by activity under Section 4 2 or you can organize separate sections for each In this discussion, only Mitigation and Monitoring (related to the IEE specifically) are treated, on the assumption that evaluation will be dealt with as part of your overall monitoring and evaluation (M&E) framework.

Identify Mitigation Options Mitigation is the purposeful implementation of decisions or activities that are designed to reduce the undesirable impacts of a proposed action on the affected environment Various mitigation categories are shown in Box 4 5

Note that the mitigation categories are arranged hierarchically according to desirability In other words, avoiding impacts is preferable to having to rectify impacts or provide compensation for them.

Consider using a structure such as that provided in Table 4 2 below to organize mitigation options

Key issues to consider in developing your mitigation strategies

- How costly are the mitigative measures relative to project cost? If they are more than one to ten percent of the cost, perhaps you should recommend redesign

- Who will be responsible for design, implementation, and monitoring of the effectiveness of your proposed mitigative measures?

- It is very important to incorporate any mitigative measures in bids or tenders, if contracts for construction are needed as part of an activity Monitor whether measures are carried out. These could be construction-related mitigative measures (such as reducing soil erosion, protecting vegetation during construction, restoring a landscape, or ensuring sound environmental practices in a construction camp) or they could be mitigative measures that need to be put in place (such as special devices for drainage flow to protect a wetland or replanting or reseeding denuded areas)

Box 4 5 Mitigation Categories

Mitigation is a general concept that may include the following list of categories

- *Avoiding* impacts altogether by not taking a particular action
- *Minimizing* impacts by limiting the degree or magnitude of the action and its implementation
- *Rectifying* impacts by repairing, rehabilitating, or restoring particular features of the affected environment
- *Reducing* or *eliminating* impacts over time by performing maintenance and preservation activities over the life of the action
- *Compensating* for impacts by replacing or providing substitute resources or environments that are, or might be, affected by the action (Compensation might include, for example, enhancing the ecological value of another wetland or protected area, if you have destroyed one Or it might be the provision of replacement housing and land for relocated people Generally, it is easier to provide compensation for people than it is to provide replacements or compensation for the biophysical environment.)
- *Monitoring impacts* of an activity can be considered a form of mitigation when decisions contain uncertainty and monitoring becomes a form of agreement among affected stakeholders, to be used to help define a shared strategy for addressing future problems as they are identified

Table 4 2 Mitigation Strategy by Activity Phase

Strategy → Phase	Planning and Design	Construction	Operation	End of Useful Life
Avoid Impact				
Minimize or Diminish Effect				
Rectify by Repair or Rehabilitation				
Reduce or Eliminate over Time				
Provide Compensation				
Monitoring				
Other				

- ***Monitoring***

There may be potential environmental impacts you are unsure of, or for which mitigation may or may not be necessary These potential impacts are candidates for monitoring Certain mitigative measures may require maintenance or checking to see if they are having their intended effects These too are candidates for monitoring

Because monitoring can be a costly undertaking, consider

- Is the monitoring needed?
- Will comparisons be made to the baseline situation, a control site/situation, or both?
- How often will the indicators be monitored?
- Who will be responsible for the monitoring?
- What will be the approximate cost (including person-days per month or year, if you can estimate that) for measuring each indicator? Can the monitoring and monitoring budget be sustained long enough to provide useful data?
- Can the indicators be derived from data already being collected? Could they contribute to regional, national, or other monitoring efforts?
- Can the stakeholders benefitting from the activity be involved in or trained to perform any of the monitoring?
- How will the results be used and with whom will results be shared, either for information purposes or because action needs to be taken?
- How will this monitoring be incorporated into your overall monitoring plan or program?

IEE Section 5

- A self-explanatory abstract of the IEE

✔ **IEE Section 5 Summary of Findings**

Summarize the findings, typically using the same organizational scheme adopted for Section 1, limiting yourself to a brief description of the activity, the nature of the impacts (if any), the recommended determination, the rationale for this determination, and applicable mitigative measures and monitoring

IEE Facesheet

- 2-3 pages including first page, summary, and approvals

✔ **IEE Facesheet**

Complete the IEE Facesheet. (See Section 3 5) You may need to abbreviate your summary (Section 5 of the IEE) The facesheet first page, the summary, and the approval lines would ideally consist of two pages, and no more than three

4 3 What if the IEE Results in a Positive Determination?

Discuss the Positive Determination with the BHR BEO to make certain the determination is appropriate, i e , an EA or PEA is indeed necessary to study further the impacts of an activity or grouping of activities Assuming

that an EA or PEA is needed, read Reg. 216 6 thoroughly to gain an understanding of the process You must first prepare a scoping statement (see Section 5 5 2) to identify the key issues to be treated in the EA or PEA Reg 216 encourages you to engage in consultations with the host country If USAID has required an EA or PEA, your host country may also require a similar document This is an issue that should be addressed in the scoping statement so that one document satisfies both USAID and host country procedures The scoping statement requires BHR BEO approval and he/she may choose to circulate it to other federal agencies EA or PEA preparation usually requires a team of specialists The scoping statement will also help you define Terms of Reference for consultant(s) or an in-house multi-disciplinary team

EA or PEA analysis and writing of the document will take time and money (see Sections 5 5 1 and 5 6 1) Try to involve local consultants

The completed EA or PEA will require BHR BEO approval and should be shared with the host country authorities Public dissemination of the document is to be encouraged While not required, collaboration with the host country throughout this process (e g , scoping, analysis of issues and recommendations on alternatives, and mitigation and monitoring) can be very useful in helping build institutional capacity and developing country-specific approaches to environmental assessment, mitigation, and strategic management

Section 5

Frequently Asked Questions about DAP/PAA Environmental Compliance

5 FREQUENTLY ASKED QUESTIONS ABOUT DAP/PAA ENVIRONMENTAL COMPLIANCE

The following questions are synthesized from Title II PVO reactions to the earlier drafts of the Environmental Information Package, now called the Environmental Documentation Manual [14] These questions arose repeatedly when PVOs and other food aid professionals began the process of understanding and responding to USAID's Environmental Procedures To assist in cross-referencing, the questions are organized thematically The questions themselves, paraphrased and combined, are in bold face type

5 1 Understanding the Rationale for Title II Environmental Compliance

5 1 1 Why is DAP/PAA compliance with USAID environmental regulations being required now, when the Agency did not require it in the past?

There are several reasons While historically international disaster assistance (emergency aid) has been and continues to be exempt from the regulations, non-emergency Title II activities are not and were not exempt In addition, USAID is placing greater emphasis on promoting long-term sustainable development Experience has also proven that taking environmental factors into account makes good development sense Food aid must be used to enhance food security (frequently through agricultural production) and where environmental degradation occurs, agricultural productivity and food security are often jeopardized.

5 1.2 What is Reg 216?

Regulation 216 is the commonly used shorthand term for the Agency's Environmental Procedures, which are codified in the Code of Federal Regulations (CFR) as 22 CFR Part 216 (also referred to informally as Reg 216 or Reg 16)

5 1.3 What happens if an activity is undertaken without adequate environmental analysis?

USAID and those involved in the certification process are open to potential lawsuits, and the good name of all those involved is jeopardized Most important, without environmental review and underlying environmentally sound design, an activity may not yield the results sought and may not be sustainable Furthermore, Title II funds cannot be obligated unless activities receive prior Reg 216 concurrence from the BHR BEO

5 2 Responsibilities and Timelines

5.2 1 What is the timeline for Environmental Compliance of Title II partners?

All Title II development activities will be reviewed in accordance with USAID's Reg 216 USAID believes that the incorporation of environmental oversight, and the analysis and planning associated with it, will improve the effectiveness of our Title II programs Compliance is now required of TII development activities, and **by the end of FY 98, all TII activities (including those previously approved by FFP) must have an Initial**

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[14] Many of the questions were generated during several rounds of meetings and e-mail exchanges with Title II PVOs during 1997 among USAID staff, the CS Environmental Working Groups of FAM and USAID/Ethiopia, the Africa Bureau Environmental Capacity Building workshop for Title II PVOs in Ethiopia (February 1997), and other meetings with the Ethiopian environmental working group

Environmental Examination (IEE) or Categorical Exclusion (CE) request submitted and approved by USAID

- Environmental documentation must begin as soon as possible, and be completed expeditiously
- All DAP or PAA submissions for FY 99 should include an IEE or CE request cleared by the Mission Director or his/her designee (typically an MEO), unless an IEE or CE for the respective project has already been approved by USAID
- However, on a case-by-case basis FFP will accept draft (i e , not yet approved) CEs/IEEs through the end of FY 98, because some field staff (particularly those in Latin America and the Caribbean) will receive Environmental Compliance training later than others
- FFP will work with PVO headquarters and FAM to develop environmental screening, review, and guidance materials and communicate information about the compliance process
- FFP will collaborate with Title II development partners and USAID geographic Bureaus to offer training in environmental analysis to PVO field staff

5 2 2 Who does what?

PVOs Field staff will prepare an environmental analysis of their activities, which will form the basis of the appropriate USAID environmental documentation PVO staff will have guidance materials to help determine what kind of environmental documentation is required in various instances and can draw on outside expertise (MEO, REO, local and U S consultants as needed) The environmental documentation is incorporated by the PVO in the DAP/PAA design process PVOs first submit environmental documentation to the USAID Mission Environmental Officer, in consultation with the Mission's FFP Country Backstop Officer (if any) The MEO obtains Mission clearance, and the PVO submits to the Office of FFP for clearance by the Director, preferably via the FFP Country Backstop Officer

USAID Missions The MEO assesses information, recommends how an activity is to be classified, and works with the Title II partner and the Food for Peace Officer to finalize documentation While it is preferable for the PVO to prepare the environmental documentation, there may be some cases where the Mission prefers to prepare the documentation, based on input from the PVO Thus, it's important for the PVO to discuss preparation with the Mission before assembling the documentation It is common practice for the MEO to clear on the documentation and for the Mission Director to approve it. The Mission Director or his/her designee must clear the IEE or Categorical Exclusion request prior to final IEE/Categorical Exclusion and DAP approval by USAID/Washington. Once the Mission has cleared the IEE/Categorical Exclusion, a signed copy should be sent to BHR/FFP (preferably as part of the DAP/PAA submission)

USAID/W The IEE must be cleared by the Director of FFP as a request for BHR BEO concurrence Concurrence by the USAID BHR BEO constitutes the last step in the approval process Geographic Bureau clearances are not required, though CSs are free to send geographic bureau environmental officers informational copies of environmental documentation, and to seek the guidance and expertise of these individuals during the IEE preparation and project design process The BHR BEO will also provide informational copies of IEEs to the relevant geographic BEOs and seek their input, as appropriate

Following review of the IEE by the Mission and USAID/W, the CS may be asked to modify current activity designs or budgets An EA (a more comprehensive analysis than an IEE) may be required if the IEE recommends

a Positive Determination, i e , when significant (adverse) environmental consequences have been identified in the IEE and activity approval process It is a good idea to give the BHR BEO a "heads up," and to keep both the BHR BEO and geographic BEO in the loop, to avoid surprises and help answer specific questions

5 2.3 Is the DAP/PAA approved before the environmental documentation is approved, or only after the approval of environmental documentation (this would likely be an IEE or Categorical Exclusion)? Is obligation of funds dependent on approved environmental documentation? Could a DAP be approved, but funds not be obligated until after environmental documentation is approved?

In principle, fully approved environmental documentation is to be submitted with the DAP or PAA, because **future obligations cannot be made until the documentation is approved** Beginning with the FY 1999 DAP and PAA, cleared environmental documentation will be submitted with the DAP or PAA, and the approval of the DAP/PAA will not be possible unless there is suitable environmental documentation However, during the transition period through FY 98, various adaptations to the timing and sequence will be accommodated as appropriate (see Annex D 1, Section II.C)

5.2 4 What if I do an IEE and submit it with my DAP, but the IEE recommends a positive determination indicating that I will need to do an EA? Can I use the monies that I might get via that DAP to expend on the EA process so that I would be in compliance?

PVOs must defer activities affected by the EA, but would be able to implement other approved activities PVOs could request a Categorical Exclusion to conduct the study itself, per 22 CFR 216 2(c)(iii) If an EA is needed, PVOs should budget for it, by requesting 202(e) funds It is recommended that provision for IEE-related environmental review be made as a line item in the monetization component's budget as submitted with the DAP proposal. In ex post facto cases, budgeting would require a budget amendment proposing a shift of funds from one or more line items to an IEE/EA line item. An explanation of how the shift was made, without compromising the schedule of activities for which the budget was originally designed to support, should accompany the amendment request[15] (see also Sect. 5 6 1)

5 2 5 Does environmental documentation have to be redone each time a PAA is submitted?

PAA r. . ions need not include environmental documentation (e g., an IEE), if the documentation has already been approved by USAID for the subject TII activity and no significant design changes have been made to that activity subsequent to prior environmental documentation approval If you believe the documentation is still appropriate, the PAA submission should state, under a section titled "Status of Environmental Compliance," that no changes have occurred since environmental documentation approval that warrant an amendment to the document. At the same time, the Mission's PAA approval cable to FFP should certify whether it agrees that the approved environmental documentation for the Title II activity is still valid.

In contrast to a Bellmon assessment, which must be completed in full every year, environmental compliance documentation does not necessarily have to be done every year

[15] Source David Nelson, BHR/FFP/DP, Dec 19, 1997 e-mail to Paul des Rosiers, G/ENV and BHR BEO

5 2 6 It is unclear what PVOs and NGOs should do with activities that have already started and are ongoing from previous DAPs For example, if dam construction has already started, is almost completed, or is ongoing, should an IEE be done for this activity?

Environmental documentation should be completed and environmentally responsive implementation incorporated as soon as possible into all ongoing activities Focus on the FY 99 DAPs and on the FY 99 PAAs (to be submitted in 1998) Nevertheless, for all of your ongoing PAAs, you are required to submit environmental documentation. An exception to this rule, on a case-by-case basis, may be those activities heading for their last year of implementation and ending (as of this writing, this would include those activities begun with the FY 95 DAPs, submitted in 1994) If a project is near completion, an IEE may not be useful Such projects should be discussed with the USAID Mission FFP Project and Environmental Officers

PAAs typically are short on specific information about activities, except perhaps where new activities are proposed, so you will need to submit some detail about activities with the IEEs that are prepared for the PAAs Implementation of activities that trigger a Negative or Positive Determination under the IEE process should not proceed, **in principle**, until the appropriate assessment or review steps are completed, and appropriate mitigation actions are in place **In practice**, the IEEs (or Categorical Exclusions), once signed off, will be applied to all newly approved DAPs or ongoing PAA activities to be initiated in the next cycle

5.2 7 Why does environmental documentation require USAID/Washington concurrence and clearances if USAID is trying to empower PVOs and USAID/Missions to make decisions for themselves, and increase their responsibility for compliance with Reg 216?

By statute, USAID cannot fully delegate authority for environmental decision-making from the BEO to the field under the concurrence process mandated by Reg 216 The regulations cannot be changed internally by USAID, since they are established Federal Regulations that can only be changed by a process that involves formal notifications, public review, public comment and publication of new draft and final regulations in the Federal Register Nevertheless, the approval and concurrence process should not cause delay in most cases The BEOs typically have quick turn-around times for decisions

The regulations stipulate that a threshold decision about the significance of environmental impacts and the appropriate level of documentation must have the concurrence of the BEO in USAID/Washington The BEO will either concur or request reconsideration by the officer who made the threshold decision Differences of opinion between these officers are submitted for resolution first to the Agency's Environmental Coordinator for resolution, or (in rare circumstances) are passed on to the Assistant Administrator (216 3[a][2])

BEO concurrence provides a check against inadvertent error, as well the possibility that an implementing office might downplay environmental issues to expedite an activity Furthermore, many Missions do not have staff fully conversant with the regulations and are not able to provide the level of knowledge required. It is the BEO's job to worry about the regulation and the environment

5 3 DAP and PAA and Environmental Compliance Documentation

5.3 1 If the DAP or PAA contains several activities, do I submit separate environmental documentation for each activity?

Typically, no You can cover several activities in one document. The EDG and additional guidance in this manual on compliance (see Sections 3 and 4) explains how to do this If the DAP consists of a suite of different activities, such as agricultural credit, irrigation, and/or road building, it may make sense to organize Sections 1 0 through 4 0 of the IEE under the topical activity-cluster headings so that the sets of activities are analyzed separately Thus, the sections would be repeated for each set of activities, and IEE Section 5 0 and the Facesheet summary would become the synopsis of all the parts See Annex B 4 and B 5 for draft Title II DAP IEEs

5.3 2 What does the PVO do if the activities are not known or fleshed out in any detail at the time of the DAP or PAA submittal?

Consider a deferral or preparing an "umbrella" IEE Annex F provides information about preparing environmental documentation that can be submitted with the DAP or PAA when activities have not yet been designed in full. Annex F also provides guidance on how to do subsequent screening and environmental reviews of these activities as they are designed, without requiring that each submission receive USAID/Washington approval

5.3.3 If deferrals are not encouraged, why are they provided as an option?

Deferrals merely postpone the inevitable, but they do buy time and they do allow you to separate out those activities that can proceed from those that cannot. Deferrals may be unavoidable in certain situations where some DAP elements need further definition (e g , specific location, nature, and time), before they can be reviewed environmentally Decisions on implementing those elements are also deferred, and **no commitment of resources should be made.** Multiple-activity DAPs typically have a combination of multiple determinations, of which the deferral needs to be an available option **In situations where a deferral might be appropriate, a Negative Determination with Conditions involving screening and review processes is an alternate option** (again, see Annex F)

5.3 4 What needs to be submitted in cases of an officially declared emergency?

In the case of international disaster assistance for a declared emergency, no environmental documentation is needed, but the exemption must be properly justified (see Sections 1 3 and 2 2 1) Nevertheless, PVOs are encouraged to apply sound environmental principles in carrying out emergency activities Any other emergency situations require a formal written determination by a USAID Assistant Administrator, in response to an emergency declaration by the U S ambassador, usually to the Office of Foreign Disaster Assistance

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5 4 Environmental Analysis

5 4 1 Is there a recommended way to organize DAP or PAA activities for the purpose of environmental decision making?

Drawing on the sets or suites of activities and interventions in the PVO's DAPs and PAAs, and preferably parallel to the format of your performance-monitoring plan and strategic framework, you could identify the nature and scale of the activities, geographic distribution, and relative proportion of resources devoted to the activities Environmental decisions are ultimately site-specific and activity-specific, so having a sense of locations and activity characteristics will allow the overall potential for environmental impacts to be evaluated as well as the document preparation effort

You may organize this information in a table (see Section 2, Table 2 2) Note that this preparatory exercise provides an overview, so only ballpark figures are needed to arrive at a reasonably accurate order of magnitude With this information in hand, use the EDG The format presented is intended as a guide only, and not meant to be the only way to present this information. Modify yours if necessary as long as the essential headings and their intent are addressed. Subsequent steps in preparing the documentation may require other tables and report formats appropriate to the nature and location of the activities

5 4.2 How do I determine whether environmental documentation must be done for each separate activity proposed or if programmatic documentation would be a more logical approach?

Environmental analysis is needed prior to and as input to any IEE, EA, or PEA The approach to the conduct of environmental analyses depends on whether the proposed activities are generic or site-specific Highly site-specific activities, such as an irrigation intervention, require analysis specific to the site within a "classic" IEE or as part of a post-IEE environmental review conducted under an "umbrella" IEE (see Question 5 3 2) If the scale of the activity is "significant" (a positive determination), it normally requires an EA. A group of similar "significant" activities in a region can also be treated within the framework of a PEA. More generic activities, such as soil erosion and terracing in several locations within a particular area, may be analyzed as a group within a "classic" IEE or, if an umbrella IEE has been prepared, similarly grouped and analyzed as part of a post-IEE environmental review As in the example of highly site-specific activity(ies), activities considered "significant" would normally require an EA or a PEA.

5 4.3 How do I determine whether the scale or magnitude of my activities may result in significant effects? Reg 216 is unclear as to what scale or magnitude of a proposed action of group of actions is considered significant and therefore would trigger an EA. For example, in interpreting Reg 216 compliance requirements, certain essential specifications as to what constitutes a "large" vs "micro" dam, "major" irrigation project, etc., are not given. Without this information, how can PVOs/NGOs make determinations on their activities? More detailed specifications seem to be needed

The very purpose of an IEE is to provide initial recommendations regarding a threshold decision, based on environmental analysis Also, remember that coming to conclusions about what constitutes "significant' scale or magnitude for activities is often a matter of judgment among professionals Scale and magnitude decisions often involve reasoned subjective decisions rather than objective science, depending on the environmental context, e g , the same intervention near a protected area may be "significant" but "not significant" in another location Therefore, it is often useful in making such decisions to form and involve a team with varied environmental expertise in these decisions

In some cases, a USAID Mission may take responsibility for acquiring specifications and data already developed (for example, by the host government) and for identifying parameters needed to assist PVOs/NGOs in making their determinations Although these kinds of specifics may not currently be available, the NGO/PVO can still proceed with an environmental analysis, begin the documentation process,
and identify mitigation and monitoring measures to be taken to ensure that the activity is optimally sustainable and will not cause unintended harm to the environment

In addition, the environmental analysis serves as an informal process for identifying mitigation measures linked to activity implementation This process will give you a sense of the scale and magnitude of potential impacts Begin the environmental analysis by simply listing all activity categories, and focus the collection of information on those activities that you consider to be not categorically excludable That information will be essential for the IEE If you believe your activities will have no significant (adverse) effects, provide the rationale in your IEE

Remember that the umbrella IEE process (which provides for a Negative Determination with conditions) may be used if you have a large set of multiple activities and most of your activities are small-scale and not yet defined in much detail In the course of refining other environmental review tools for country-specific situations, including country-specific IEE and post-IEE Environmental Screening Forms under an "umbrella" IEE process, you should expect to develop additional specifications for what locally are considered to constitute "significant" scale and magnitude

5 5 Questions Regarding Preparation of Environmental Assessments (EAs) or Programmatic Environmental Assessments (PEAs)

5 5 1 How much time and effort does a PEA or EA take to carry out?

A good-quality EA or PEA process, from the scoping sessions and development of the scope of work, to data collection, analysis, preparation, internal review, and external review, typically takes no less than a year However, with aggressive workers and committed reviewers, six calendar months is feasible This length of time is little different for an EIS under U S procedures, although complex projects take considerably longer For a good-quality EA or PEA, experience demonstrates that approximately six to eight person-months of effort is typical, with a minimum of three person-months, not counting the efforts of Mission Environmental Officers or Project/Results Package Managers If document translation is required to achieve host country participation, more effort is needed. Nevertheless, despite the time commitments this may require, the intent of an EA or PEA is not to let this detailed assessment process discourage you from carrying out important development initiatives Rather, the EA or PEA should be viewed as a key element of sound design

5 5 2 What is "scoping" exactly?

Under Reg. 216, Section §216 3(a)(4), scoping as applied to an EA typically involves a consultative process that characterizes the "scope and significance of issues to be analyzed" and eliminates from further discussion issues that will not have a significant effect on the environment. Scoping involves gathering information from a variety of public and private sources locally and nationally It also provides a mechanism for public and technical concerns to be evaluated and presented to assist decision-making and priority setting It informs and involves people potentially affected, takes into account local values, considers reasonable approaches and practical alternatives, determines the procedures for consultation and analysis, and establishes the terms of reference Under Reg 216, the scoping statement – actually a summary of the results of the scoping session(s) – provides a description of "*(1) the timing of the preparation of the 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 " It also provides a "*description of how the analysis will be conducted and the disciplines that will participate in the analysis* " Note that **the scoping document requires BEO approval in Washington, per Reg 216 6(e)**

5.5.3 Who does the scoping document?

If an EA is required, first consult with your Mission Environmental Officer (MEO) your Regional Environmental Officer (REO), if one exists, and/or your Bureau Environmental Officer (BEO) Remember that EAs are rarely necessary for PVO small-scale development activities The BHR BEO will confirm whether an EA is needed and should be able to provide you with sample scopes of work (SOWs) and assessments Different combinations of actors are responsible for the scoping document, depending on the situation Ideally, the EA process is cast as a development tool and learning opportunity for all partners In any case, scoping precedes the Environmental Assessment The party carrying out the program of activities being assessed, in this case the PVO, is usually responsible for the EA, but USAID can provide initial advice In the case of a Programmatic Environmental Assessment, it may make sense for a combination of USAID, PVO, and host country representatives to be involved.

5 6 Designing and Managing More Environmentally Sound Activities

5 6 1 What are some options for providing resources to support proper environmental analysis, assessment, and the associated measures that will likely result? Should PVOs be working on amending 202(e) grants or monetization funds to account for the cost of these assessments?

The answer depends on the specific situation and an analysis of the needs and applicable options It is perfectly normal, understandable and acceptable that outside assistance may be needed in some situations, normally by the PVOs themselves USAID and its PVO partners do need to ensure that participation by the PVOs, NGOs, affected communities, and interested parties is incorporated.

The main options include at least a combination of one or more of the following, depending on each situation

- PVOs include appropriate budgetary support in their 202(e) grant requests, amendment requests to 202(e) budgets, or monetization budgetary outlays
- USAID Missions support suitable assessments or analysis and technical assistance from Mission operating budgets
- BHR/FFP funds [via the USAID Global Bureau's Environmental Policy and Institutional Strengthening IQC (EPIQ) or other modality] support mutually agreed upon technical assistance
- FAM may facilitate certain types of support and backstopping
- Combinations of PVOs combine resources in a joint contracting action, or a "lead PVO" may be mutually selected and receive special support to serve as a resource for other PVOs and NGOs
- USAID geographic bureaus may provide some resources, expertise or support mechanisms

Also see Section 5 2 3

5 6 2 What sorts of resources are available for training and related capacity building to help PVOs and partners come into compliance?

The Africa Bureau's Environmental Capacity Building Initiative (ENCAP) has already sponsored one course for Title II PVOs in Ethiopia (February 1997) and another in Ghana (December 1997) A third is scheduled for Cape Verde in March 1998 AFR has also assisted BHR and FAM in developing the Environmental Documentation Manual to guide PVOs through the process based on practical experience BHR/FFP funds have been allocated to the Environmental Policy and Institutional Strengthening IQC (EPIQ) to support development of training workshops and technical assistance During 1998, another regional course is expected to be held for Title II PVOs in Latin America.

Here again, PVOs may want to add to their budget requests to account for this need, particularly to target indigenous partner NGOs and other organizations Again, one could envision a lead PVO assuming the role of providing training support.

5 6.3 How might PVOs best move "beyond compliance"to enhance environmentally sound activities?

USAID and its PVO partners are all interested in getting beyond compliance—to focus on improving the way we do business technically and operationally Still, in the initial stages of applying Reg 216 to food assistance development programming, the focus must be on environmental compliance

Of course, useful information and human resources are available within host country universities, among host government environmental/ natural resource planning and management units, and through in-country private consultants It may be possible as well to capitalize on available training courses in technically specific areas of value to NGOs/PVOs and others

The summary information and suggestions provided in the *Environmental Guidelines for Small-Scale Activities* and the recommendations and guidance provided in Catterson and Knausenberger's *Environmental Review and Public Law 480 Food Aid Programing* (draft) provide a useful starting point on the subject. Many other valuable and more detailed handbooks exist on environmentally sound design and management of small-scale projects Most notable among these are a series of CODEL documents (available from VITA—see the literature cited in Annex H 1 of this EDM) covering small-scale activities in sectors that include agriculture, forestry, livestock, integrated conservation and development projects, and water projects

An **electronic information-sharing network** is needed, on both environmental compliance and environmentally sound small-scale activity management The purpose of such a network might be to

- answer questions from the field on compliance and sound environmental design in key sectoral categories such as watershed management, soil and water conservation, sustainable agriculture, feeder road construction, agroforestry, small-scale irrigation, small dam construction, etc ,
- serve as a forum for field discussion and exchange of information on field activities in the sector categories,
- provide a means for electronic conferencing/seminars on topics in sectors and/or environmental

compliance issues, and

- assist field implementers by serving as a filter for accessing the most relevant Internet electronic databases on environment/natural resource management and environmental assessment

Costs would include those for start-up and maintenance of the electronic networking system and database and for an environmental electronic site coordinator and/or part-time consultants The EWG might consider establishing the coordinator/facilitator's position with one of the EWG partners who expresses interest in taking the lead in this area, or with the FAM unit itself

Other possibilities also need to be cultivated, including **development of linkages between strategic and results planning, performance monitoring and evaluation**, and **environmental review, mitigation, and monitoring** Workshops could be organized for the above purpose, initially focusing regionally and sectorally on soil and water management (including small-scale irrigation) PVOs at the field level might also consider sharing technical assistance and training in environmentally sound design, implementation or compliance to support PVO Title II activities Such an approach would foster the sharing of PVO, university, and private sector environmental/natural resource specialized expertise at the country or regional level

Local resource users and stakeholders also should be encouraged to contribute "best practices" for environmentally-sound planning and implementation This should build upon and go beyond farmer and women's participation in PRA activities Whenever possible, indigenous stakeholders (or their representatives) should be encouraged to participate in working groups, environmental compliance workshops, and "best practices" technical training workshops Through such participation, indigenous stakeholders can also make a significant contribution in returning/devolving issues and "lessons learned" to the rural/urban communities they represent. Initiatives of this kind should simultaneously promote "bottom-up" communication

"Lead PVO " BHR and the EWG might consider encouraging Title II PVOs at the country or regional level to apply for 202(e) funds that would allow the PVO applicant to take the lead in providing environment/natural resource management sector expertise that matches needs of several PVOs/NGOs working on similar activities in a given country or region, for example, water and sanitation in Mozambique or watershed management and soil and water conservation in Ethiopia.

As a further example, 202 (e) funds might be made available to allow a lead PVO to designate or hire an engineer with experience in environmentally sound small-scale road design to serve as a PVO "road-runner" or "roving helper" who would spend up to 50 percent of his/her time providing short-term technical assistance and training to other PVOs/NGOs in the country or region

This individual might be a member of the lead PVO's staff, or be contracted by the PVO from in-country university or consulting firm expertise (The latter arrangement might be more desirable from the point of view of sustainability after termination of in-country Title II program support.) Specialists of this kind would need a small budget for equipment and materials to support TA and training activities (e g sourcebooks, flipcharts, overheads, etc) and a line item for transportation and per diem.

ANNEXES

Annex A	Title II Environmental Compliance Forms Categorical Exclusion and Initial Environmental Examination (Templates)
Annex B	Examples of Categorical Exclusions and Initial Environmental Examinations
Annex C	Programmatic Environmental Assessments Special Application
Annex D	Official USAID Guidance
Annex E	Sample Tables, Matrices, and Environmental Checklists
Annex F	Applicability Instructions on Preparation of an Umbrella IEE and Use of Environmental Screening and Report Form
Annex G	USAID Pesticide Procedures and USEPA Pesticide Registration Status
Annex H	References and Resources

Annex A

Title II Environmental Compliance Forms:

Categorical Exclusion
and
Initial Environmental Examination

Templates for Use by
USAID Bureau for Humanitarian Response
FFP/DP
Cooperating Sponsors

Annex A 1	**Title II Environmental Compliance Facesheet**
Annex A 2	**Request for a Categorical Exclusion**
Annex A.3	**Outline of the IEE Narrative Template**
Annex A 4	**Annotated IEE Narrative**

Note To use these forms as templates, remove the headers and footers, the Annex number headings, and other information points

Annex A 1

TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET

Title of DAP/PAA Activity

CS name/Country/Region

Funding Period FY_____- FY_____

Resource Levels Commodities (dollar equivalent, incl monetization) _____
Total metric tonnage request _____
202(e) grant $_____

Statement Prepared by Name _____ Date _____
Title _____

IEE Amendment (Y/N)? ____ **Date of Original IEE** _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply)
*air*___ *water*___ *land*___ *biodiversity* (specify)_____ *human health*____ *other*____ *none*_____

Environmental Action(s) Recommended (check all that apply)

_____ 1 *Categorical Exclusion*(s)

_____ 2 Initial Environmental Examination

____ *Negative Determination* no significant adverse effects expected regarding the proposed activities, which are well defined over life of DAP/PAA. IEE prepared
____ without conditions (no special mitigation measures needed, normal good practices and engineering will be used)
___ with conditions (special mitigation measures specified to prevent unintended impact)

____ . *egative Determination* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed "Umbrella IEE" prepared [go to Annex B and Annex F for examples]
____ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring

____ *Positive Determination* IEE confirms potential for significant adverse effect of one or more activities Appropriate environmental review needed/conducted
____ EA to be / being / has been (circle one) conducted Note that the activities affected cannot go forward until the EA is approved.

____ Deferral one or more elements not yet sufficiently defined to perform environmental analysis, activities will not be implemented until amended IEE is approved

Summary of Findings

Briefly (1 or 2 paragraphs) describe the activities being implemented or proposed, justify the reason for the recommended action(s), and cite appropriate sections of Reg 216 as needed For IEEs, reproduce here the Summary from Section 5 of the IEE narrative, and/or Section 2 of the Request for Categorical Exclusion

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED

Clearance

Mission Director _____ Date _____

Food For Peace Director _____ Date _____

Concurrence

Bureau Environmental Officer (BHR) _____ Date _____

Approved _____

Disapproved _____

Optional Clearances

FFP Officer _____ Date _____

Mission Food Aid Manager _____ Date _____

Mission Environmental Officer _____ Date _____

Regional Environmental Officer _____ Date _____

Geographic Bureau Environmental Officer _____ Date _____

General Counsel _____ Date _____

Annex A.2

REQUEST FOR A
CATEGORICAL EXCLUSION

1 Background and Activity Description

More in-depth information than what was provided on the cover sheet, especially if activities are relatively diverse, complex, and likely to operate for several years This will allow the environmental recommendation to be more self-explanatory and free-standing, especially for the BEO's record keeping and tracking purposes

2 Justification for Categorical Exclusion Request

Refer to appropriate guidance from Reg 216, especially 22 CFR 216 2(c)

Annex A.3

Outline of the IEE Narrative: Template

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project Data
DAP/PAA Program/Activity
CS Name, Country/Region

1 BACKGROUND AND ACTIVITY DESCRIPTION

- 1 1 Background
- 1 2 Description of Activities
- 1.3 Purpose and Scope of IEE

2 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

- 2 1 Locations Affected
- 2 2 Environmental Policies and Procedures

3 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

4 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

- 4 1 Recommended IEE Determination
- 4 2 Mitigation, Monitoring, and Evaluation

FOR UMBRELLA IEE, THE FOLLOWING MIGHT BE USED

- 4 1 Recommended Planning Approach
- 4.2 Environmental Screening and Review Process
- 4 3 Promotion of Environmental Review and Capacity Building Procedures
- 4 4 Environmental Responsibilities
- 4.5 Mitigation, Monitoring, and Evaluation

5 SUMMARY OF FINDINGS

- 5 1 Environmental Determinations
- 5 2 Conditions

Annex A 4

Annotated IEE Narrative

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project Data
DAP/PAA Program/Activity
CS Name, Country/Region

The following narrative should be organized around the major activity sub-headings, if the activity categories are rather distinct, e g , road construction, agricultural development, and irrigation works As in sample IEEs (Annex B4 & B 5), treat each major activity under each section Alternatively, one could organize by activity and then each major heading would cover the Sections 1 to 4 The summary in Section 5 is to cover all categories addressed, with an overview of the summaries at the end.

If you are preparing an "Umbrella" IEE, please refer to Annex F for the detailed description of what the outline might include

1 0 BACKGROUND AND ACTIVITY DESCRIPTION

Describe why the activity is desired and appropriate, and outline the key activities proposed for Title II funding A current activity description should be provided and the purpose and scope of the IEE indicated (amendment, why needed, what it covers)

2 0 COUNTRY AND ENVIRONMENTAL INFORMATION

This section is critical and should briefly assess the current physical environment that might be affected by the activity Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e g wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities

The information obtained through this process should serve as an environmental baseline for future environmental monitoring and evaluation Be selective in the country and environmental information you provide, as it should be specific to the activity being proposed and more information is not necessarily better

Finally, indicate the status and applicability of host country, Mission, and CS policies, programs and procedures in addressing natural resources, the environment, food security, and other related issues

3 0 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

This section of the IEE is intended to define all potential environmental impacts of the activity or project, whether they be considered direct, indirect, beneficial, undesired, short-term, long-term, or cumulative

4 0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

For each proposed activity or major component recommend whether a specific intervention included in the activity should receive a categorical exclusion, negative determination (with or without conditions), positive determination, etc , as well as cite which sections of Reg 216 support the requested determinations

Recommend what is to be done to avoid, minimize, eliminate or compensate for environmental impacts For activities where there are expected environmental consequences, appropriate environmental monitoring and impact indicators should be incorporated in the activity's monitoring and evaluation plan

5 0 SUMMARY OF FINDINGS

This should summarize the proposed environmental determinations and recommendations

Annex B

Examples of Categorical Exclusions and Initial Environmental Examinations

Annex B 1 **IEE or Categorical Exclusion for Primary Education Teacher Training Project (PETTP)**

Annex B.2 **IEE with Positive Determination and Categorical Exclusion: Bada Irrigated Agriculture Project**

Annex B.3 **"Umbrella" IEE and Categorical Exclusion: Ethiopian NGO Sector Enhancement Initiative**

Annex B 4 **Draft IEE on CARE Peru DAP/PAA**

Annex B.5 **Draft IEE on Africare Uganda Food Security Initiative DAP/PAA**

Note This Annex presents a selection of illustrative approved CE/IEEs from the Africa Bureau, and two draft IEEs of Title II food aid for development activities using the recommended BHR/FFP environmental documentation format Each Bureau tries to maintains reasonable internal consistency in its IEE format, and while the Bureaus' formats are comparable, they are not necessarily the same Thus, you will find that the CE/IEE formats of the Africa Bureau differ somewhat from BHR's

Annex B 1

INITIAL ENVIRONMENTAL EXAMINATION
OR
CATEGORICAL EXCLUSION

PROGRAM/ACTIVITY DATA

Program/Activity Number 680-0223
Country/Region Benin, West Africa
Project/Activity Title Primary Education Teacher Training Project (PETTP)

Funding Beginning 1997 **Funding End** 2001 **LOP Amount** $ 3,000,000
Sub-Activity Amount
IEE Prepared By Georgette Pokou **Current Date** 8/4/97

IEE Amendment (Y/N) __N__ If "yes," Number & date of original IEE _____, __/__/__

ENVIRONMENTAL ACTION RECOMMENDED (Place X where applicable)
Categorical Exclusion __X__ Negative Determination _____
Positive Determination _____ Deferral _____

ADDITIONAL ELEMENTS (Place X where applicable)
EMEMP _____ CONDITIONS _____ PVO/NGO _____

SUMMARY OF FINDINGS (Please Limit Text to This Page)
The Primary Education Teacher Training Project (PETTP) was initiated to support the on-going Children's Learning and Equity Foundations (CLEF) Program The subject project will assist the Government of Benin implement its Teacher Training Action Plan by providing support directly to actors of the Teacher Support Network (Reseau d'Animation Pedagogique) and training teachers

As per the CLEF Program IEE dated September 1991, the CLEF Project falls within the classes of projects excluded from further environmental review pursuant to Regulation 16, Section 216 1(c)(1)(i) As such, a categorical exclusion was granted.

The project activities as described below are determined not to have an effect on the natural or physical environment, and thus are recommended for **Categorical Exclusion** as per 22 CFR 216.2 (c)(1)(i) and 22 CFR 216.2(c)(2)(i) and (iii)

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED (Type Name Under Signature Line)

CLEARANCE
Mission Director _____ Date _____
Thomas Park

CONCURRENCE
Bureau Environmental Officer _____ Date _____
Carl M Gallegos Approved _____
Disapproved _____

File No 27ben2 iee (AID/W)

CLEARANCE
General Counsel (Africa Bureau) _____ Date _____
Drew Luten

ADDITIONAL CLEARANCES (Type Name Under Signature Line)

Mission Environmental Officer _____ Date _____

Project Manager
Basic Education Coach _____ Date _____
Martin Schulman

Regional Environmental Officer _____ Date _____
Dennis Panther, REDSO/WCA, Abidjan

STATEMENT FOR CATEGORICAL EXCLUSION

PROJECT/ACTIVITY DATA

Program/Activity Number	680-0223
Country/Region	Benin, West Africa
Project/Activity Title	Primary Education Teacher Training Project (PETTP)

1 0 BACKGROUND AND PROJECT DESCRIPTION

The four year activity goal is to improve the quality of Benin's primary education system This will be accomplished in the short term by assisting the Government of Benin to implement its Teacher Training Action Plan by providing support directly to the Reseau d'Animation Pedagogique (Teacher Support Network), and in the long term by creating an autonomous national institution capable of providing support to primary school teachers through the provision of training, the promotion of pedagogical innovations, the dissemination of pertinent information, and education research The activity will build on IFESH's three years of experience in Benin providing support to primary school teachers The objectives of the proposal directly support the stated policies, programs and priorities of the Government of Benin (GOB) and respond to the needs of the population at large The objectives also support the Mission's goal, sub-goal, and strategic objective 1—to achieve sustainable quality, equity, and efficiency in the basic education system

The activity aims to accomplish three key results (1) 15 Beninese professionals who will be responsible for providing pedagogical support services for IFESH are recruited and trained, (2) Individual training to upgrade the pedagogical skills of different actors of the Teacher Support Network provided, and, (3) New types of interventions and support programs to assist primary teachers develop and improve the quality and pertinence of their didactic skills

2 0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Information is not required for this section, as project activities are not expected to have an impact upon the environment

3 0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

The PETTP described above is not expected to have an impact upon the environment.

4 0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Mitigation actions will not be required

5 0 SUMMARY OF FINDINGS (copy also onto Face Page)

The subject project will provide support to the Government of Benin to strengthen the on-going Education Reform Program in the area of in-service teacher training The project activities are determined not to have an effect on the natural or physical environment, and thus are recommended for **Categorical Exclusion** as per 22 CFR 216 2(c)(1)(i) and 22 CFR 216 2(c)(2)(i) and (iii)

Annex B 2

INITIAL ENVIRONMENTAL EXAMINATION
OR
CATEGORICAL EXCLUSION

PROGRAM/ACTIVITY DATA

Program/Activity Number PL-480 Title II
Country/Region Eritrea
Program/Activity Title Bada Irrigated Agriculture Project

Funding Begin FY95 **Funding End** FY97 **LOP Amount** $ 4,665,000
Sub-Activity Amount $ N/A

IEE Prepared By K Puffenberger, USAID, Asmara **Current Date** 09/19/96

IEE Amendment (Y/N) __N__ If "yes," Number & date of original IEE _____, __/__/__

ENVIRONMENTAL ACTION RECOMMENDED (Place X where applicable)
Categorical Exclusion __X__ Negative Determination _____
Positive Determination __X__ Deferral __X__

ADDITIONAL ELEMENTS (Place X where applicable)
EMEMP _____ CONDITIONS _____ PVO/NGO __X__

SUMMARY OF FINDINGS (Please Limit Text to This Page)

The technical assistance, agricultural inputs, extension work, credit and commodities in the new technologies, provision of inputs, access to credit, technical assistance and training for soil and water conservation improvements, and technical assistance for agricultural marketing efforts are recommended for **Categorical Exclusion** under CFR 216 2(c)(2)(i)

The procurement and/or use of pesticides in relation to the Agricultural Production component will be **Deferred** until completion of a Risk/Benefit Analysis as required under the Pesticide Procedures under CFR 216.3(b) The Mission may call upon the regional environmental staff (REDSO/ESA) to assist in this analysis

The Irrigation System Construction activities are recommended for a **Positive Determination** and will require an Environmental Impact Assessment (EIA), which will be submitted for review and approval of the Bureau Environmental Officer

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED (Type Name Under Signature Line)

CLEARANCE
Mission Director _____[draft]_____ Date 9/19/96
Glenn E Anders

CONCURRENCE
Bureau Environmental Officer _____s/_____ Date 9/19/96
Carl M Gallegos Approved __X__
Disapproved _____

File No 26erit1 iee (AID/W)

CLEARANCE
General Counsel (Africa Bureau) _____ Date 9/23/96
Drew Luten

96

ADDITIONAL CLEARANCES (Type Name Under Signature Line)

Mission Environmental Officer _____/s_____ Date _____
Kenneth Randolph

Project Manager _____/s_____ Date _____
Kathrin Puffenberger

Regional Environmental Officer _____/s_____ Date _____
Charlotte Bingham, REDSO/ESA

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA

Program/Activity Number	PL-480 Title II
Country/Region	Eritrea
Program/Activity Title	Bada Irrigated Agriculture Project

1 0 BACKGROUND AND PROJECT DESCRIPTION

1 1 Activity Description

The goal of Africare's Bada Irrigated Agriculture Project is to increase the availability and access to food for the population of Bada and surrounding areas Measures of goal achievement will be

A A 75 percent reduction in dependency on food aid of the general population in Bada.
B A 25 percent increase in farm household income
C Increased household food consumption, including the quantity and variety of foods
D Improved household nutritional status of the most vulnerable segment of the population (children under two years of age, and mothers)

The objectives are to increase farmer productivity, and to strengthen the food distribution system through the enhancement of private sector participation. The project responds directly to the need to improve food security in Bada and surrounding villages The funds generated from monetization will be used to undertake activities involving water resource development, agricultural production and marketing. The monetization of Title II vegetable oil will increase availability of edible oil in the general market of Eritrea.

The increased agricultural production generated as a result of the project's activities will substantially augment the amount of food available for consumption and sale in the Bada area. The sale of cash crops, by participants in the agricultural extension component, will provide these participants and their families with increased income and, therefore, economic and physical access to food which can be purchased in the market.

The impact of Africare's health activities in Bada will address some of the underlying social and economic causes of disease By increasing agricultural production and household food consumption, enhancing nutritional diversity, providing employment and income, and addressing economic needs in a manner beneficial to the environment, the project will support sustainable development in Bada.

1.2 Implementation Plan

The three major components of the project are (1) water resources development (construction of the diversion dam and the accompanying irrigation system), (2) agricultural production, and, (3) marketing A related activity will be the integration of the project's agricultural activities with the promotion of improved nutrition offered by the MOH Maternal Health/Child Survival Project.

1.2 1 Water Resource Development and Irrigation

In order to capitalize on the potential of the water and land in the project area, permanent structures will be constructed to provide a lasting solution. Bearing in mind the national objective of food security, the structures to be built will fulfill the following project objectives

- To divert some of the flow of the Regali River in order to maximize its use for crop production
- To bring more land under cultivation
- To increase yields through the introduction of modern inputs such as improved seeds, insecticides, etc
- To lessen soil erosion caused by high velocity floods
- To save farmer labor time which is repeatedly wasted each year in attempting to reconstruct the diversion structure

Irrigation System Construction Activities

The heavy flow that causes damage to downstream land can be controlled at the Regali River's neck At its narrowest, the width is 146 5 m, and the water flow depth is 2 to 3 meters The annual flow of water is estimated at 117 million m^3 The whole width is full of sand and gravel In 1993, the MOA excavated at the construction site to a depth of 5 m without reaching bed rock The profile of the foundation was characterized by a mixture of sand, gravel and boulders and cobbles In the absence of a drilling rig to determine the actual depth of bed rock, the MOA technical staff proposes to build a monolith mat type foundation of sufficient depth The diversion weir structure is planned as an impermeable concrete sealed structure, expected to act as a monolith superstructure where its sheer mass is a major advantage in its design

Permanent irrigation structures are required to improve the existing irrigation for efficient use of water, increase the production, decrease the laborious work to attempt repairing the structure each year, and permit farmers more time to devote to agricultural production The major elements of water resource infrastructure to be constructed will include

- A diversion weir to direct part of the river to the main intake canals
- Spillways to evacuate excess flood water and to protect the cultivated area from siltation
- Main intake canals to be constructed of masonry with large steel gates to control the water flow
- Main canals, composed principally of gabions and earth, will necessitate the use of heavy equipment Retaining walls and culverts will also be required at critical points
- Drop structures to reduce the velocity of the water flow, so as to minimize the scouring of canals
- Basin embankments, intake, drainage canals and outlets will be constructed to irrigate the land and to discharge the excess water so as to avoid water logging and salinity problems

The construction of the diversion structure will direct the flow of the Regali River to the two main canals One canal will irrigate Leen Bada and Bolele and the newly developed farmland, while the other canal will irrigate Erimele and Adi Merug

1 2 2 Agricultural Production

The agricultural production component has four major elements a) the introduction of new technologies, b) provision of improved inputs, and c) access to short-term credit, d) soil and water conservation The four elements are inter-linked, and must be undertaken simultaneously in order to have maximum impact. The availability of improved seeds and inputs, coupled with market opportunities are also required

a New technologies

New technologies to be tested and used in the project include

- techniques in the rehabilitation, proper care and maintenance of irrigation and drainage canals,
- the introduction of new varieties of vegetables and fruit trees, adaptable to the area and for which a market exists,
- the use of insecticides, fungicides, and pesticides, where necessary, to combat insects ("stinking bug," etc), birds, and other pests,
- the planting of trees to serve as "wind breaks" along the edge of irrigated perimeters and along the hillsides of the watershed to promote soil conservation,
- the establishment of zizyphus plantations as sources of badly needed fuel wood, and
- provision of improved inputs

b Provision of improved inputs

This will involve

- The promotion of agricultural inputs through comparison trials and through information dissemination in the farming community,
- The transportation and proper storage of all materials inputs, tools and equipment,
- The timely distribution of credit and use, and,
- The recovery of loan payments for inputs

c. Access to Short-term Credit

The project will provide short-term agricultural in-kind credit to farmers Access to credit is necessary for farmers to purchase the inputs needed to undertake technical improvements During the first year of the project, a locally hired consultant will design the credit component. A locally hired credit agent will work under the supervision of the Bada Project coordinator The credit agent will oversee credit operations and design the training and credit supervision program Reimbursed credit will be used to replenish the inputs each year At present, there are no private traders dealing in the sale of seeds or other inputs It is hoped that by the end of the project, the input procurement and distribution function of the project can be privatized and taken over by a local trader or businessman

d Soil and Water Conservation Activities

Afforestation of nearby hillsides of the watershed area in Eritrea is a must. Tree planting will be an activity of the project, involving all project personnel and project beneficiaries The project will first prepare the seedlings and then organize planting days which will include as many volunteers as possible

Recommended tree species for soil/water conservation activities include *Zizyphus mucronata, Zizyphus spina cristi Acacia senegal, Acacia tortilis, Acacia albida, Balanites aegyptiaca, Phoenix reclinata, Temonix ophila, Hyphaene thebaica,* and *Boswellia papyrifera*

Recommended fruit tree species to be tried in the project area include mango (*Mangifera indica*), lemon (*Citrus limonia*), mandarine (*Citrus nobilis*), avocado pear (*Persea americana*), guava (*Psidium guayava*), and banana (*Musa sapientum* and *Musa cavendishii*) On-farm trials on the farm will lead to still better recommendations as time goes by

1 2 3 Marketing

The project marketing component involves the development of viable strategies to ensure the sale of the increased vegetable production. The project will make available marketing information to Bada farmers A high potential for export marketing exists in Bada given its relative proximity to the Red Sea ports of Tio and Harena. An intensive market study will be undertaken during the first year or early in the second year of the project to further investigate the market potential in those areas surrounding the project, and to devise strategies for crop choice and recommended planting dates

The project marketing consultant will use the recommendations of a vegetable market study to devise strategies for the project area. The marketing consultant, working with the project extension agents, will provide training to project farmers in the most profitable crop choices and planting dates

2 0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Eritrea can be divided into three major agro-ecological zones highlands, lowlands, and coastal plain The central highlands comprise approximately twenty-five percent of the total surface area With altitudes ranging from 1,000 to 2,500 meters, the central highlands benefit from a moderate climate Rainfall ranges from 400 mm to 650 mm in an average year The central highlands are the most highly populated zone of Eritrea, and contain the capital, Asmara. The northern highlands range from 2,000 m to 2,500 m in altitude, and rainfall levels vary between 300 mm to 400 mm per year The western lowlands range from 400 to 800 meters above sea level with an average annual rainfall of 400 mm to 500 mm The western lowlands are an area of high agricultural potential for rain-fed agriculture, especially in the area located between the Gash and Setit rivers The third major agro-ecological zone is the coastal plain

The climate of the coastal plain is hot and humid with minimal rainfall which occurs between the months of December to March However, there is the potential for agricultural production due to the rainfall in the highlands during the summer season. These rains produces torrential flows in the ephemeral streams which can be diverted to cultivate the lands in the coastal plains

All the major rivers in Eritrea, with the exception of the Setit River, are ephemeral, flowing only intermittently during defined periods of the year The stream flows occur in the form of flash floods of short duration, which originate from rainfalls in the watersheds The heaviest runoff occurs during July and August, the main rainy season in the highland plateaus and headwater areas, however in areas such as Bada, water flows are also received from October through March as a result of precipitation in

the low ranges of the Tigray escarpment that falls during the winter

Bada is located in the southern most area of Northern Red Sea Zone (NRSZ) and is 74 meters below sea level Agricultural activity started in the 1940s, using traditional methods The area has a high potential for agricultural production which is dependent upon the flood waters caused by rainfall in the highlands of Adi Keyh in Eritrea, and Adigrat and Edaga Hamus in Tigray The run-off passing through the Regali River serving the project area is estimated at approximately 117 million cubic meters annually

The target area for this project is the Sub-District of Bada of the southern end of Northern Red Sea Zone (used to be Northern Dankalia) approximately 250 km from Massawa on the edge of the Danakil Depression The elevation of the project area including the catchment ranges from 74 m below sea level to 2,200 m above sea level in the Edaga Hamus mountains of Tigray The western and southwest section of the catchment area is characterized by a rolling, undulating topography and very steep slope The elevation in the agricultural production area of Bada descends below zero The total catchment area is estimated at 3,900 km^2 The total area of the project currently under cultivation is 1 800 ha, although the area cultivated could be expanded to 4,000 ha with improved water management techniques

The climate of the area is hot and arid The agricultural area is characterized by barren to very sparse vegetation, average minimum temperatures of 31°C to 43°C between and strong wind which carries dust, and relatively low humidity The very low level of rainfall on the site itself is sufficient to enable grass growth for grazing, but in itself is not able to support crop production The project area has two rainy seasons The western part of the catchment area receives rain in the months of April to September with maximum rainfall occurring in July or August. This main rainy season causes substantial amounts of runoff through the Regali river with a gradient of about 1.2% into the Bada irrigation fields The eastern part of the project area as far as the Red Sea coast gets rain in the months of October to March with highest rainfall in December to February

3 0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

To be set out in detail in the Environmental Impact Assessment

4 0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

To be set out in detail in the Environmental Impact Assessment.

5 0 SUMMARY OF FINDINGS (copy also onto Face Page)

The technical assistance, agricultural inputs, extension work, credit and commodities in the new technologies, provision of inputs access to credit, technical assistance and training for soil and water conservation improvements, and technical assistance for agricultural marketing efforts, are recommended for **Categorical Exclusion** under CFR 216.2(c)(1) and 216 2(c)(2)(i)

The procurement and/or use of pesticides in relation to the Agricultural Production component will be **Deferred** until completion of a Risk/Benefit Analysis as required under the Pesticide Procedures under CFR 216 3(b) The Mission may call upon the regional environmental staff (REDSO/ESA) to assist in this analysis

The Irrigation System Construction activities are recommended for a **Positive Determination** and will require an Environmental Impact Assessment (EIA), which will be submitted for review and approval of the Bureau Environmental Officer

Annex B 3

[ILLUSTRATIVE ONLY]
INITIAL ENVIRONMENTAL EXAMINATION
OR
CATEGORICAL EXCLUSION

PROGRAM/ACTIVITY DATA

Program/Activity Number 663-0020-G-00-5501-00
Country/Region Ethiopia
Program/Activity Title Ethiopian NGO Sector Enhancement Initiative

Funding Begin FY 95 **Funding End** FY 99 **LOP Amount** $5 million in planned LOP authorization ($3 7 million in planned obligation for Cooperative Agreement) **Sub-Activity Amount** $_____

IEE Prepared By Carla Barbiero/Ashton Douglass, PRM **Current Date**
Amended by Charlotte Bingham

IEE Amendment (Y/N) _X_ If "yes," Number & date of original IEE [no # assigned] ,

ENVIRONMENTAL ACTION RECOMMENDED (Place X where applicable)
Categorical Exclusion _X_ Negative Determination _X_
Positive Determination _____ Deferral _____

ADDITIONAL ELEMENTS (Place X where applicable)
EMEMP _____ CONDITIONS _X_ PVO _X_

SUMMARY OF FINDINGS (Please limit text to this page)
This amended Initial Environmental Examination (IEE) brings the **Ethiopian NGO Sector Enhancement Initiative** IEE of May 1995 into conformity with the Africa Bureau environmental procedures for umbrella activities It also reflects new conditions regarding placing increased environmental review responsibility with Missions for PVO/NGO umbrella type projects (Cable STATE 257896) Based on the use of a pro-active approach, incorporation of environmental review procedures, promotion of environmental review, capacity building, and monitoring, evaluation and mitigation procedures specified in this IEE, to which the Mission commits itself, the following environmental determinations are recommended

1 A **Categorical Exclusion** is recommended for project-financed technical assistance, training and education, institutional strengthening, regional communications and information exchange activities that have no physical interventions and no direct effects on the environment pursuant to 22 CFR 216.2(c)(1)(i) and 216 2(c)(2)(i), (iii) and (v) **The screening form will be used to confirm this determination for each activity** This categorical exclusion does **not** apply to education, technical assistance or training if such include activities directly affecting the environment, such as construction of facilities, per 216 2(c)(2)(i), **nor** to studies, projects or programs intended to develop the capability of recipient countries to engage in development planning when designed to result in activities directly affecting the environment, per 216 2(c)(2)(xiv)

2 A **Negative Determination with Conditions** is recommended for all other activities entailing community development. This IEE specifies a set of steps, in accordance with the Africa Bureau's *Environmental Guidelines for Small-Scale Activities in Africa*, to ensure adequate environmental review of USAID-supported activities, including capacity-building elements This negative determination is also conditioned on the provision of supplemental project technical assistance and training support to augment existing efforts These capacities will be developed and implemented in close collaboration with USAID/Ethiopia and the Initiative's partners

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED

CLEARANCE
Mission Director _____ Date _____
Margaret P Bonner

CONCURRENCE
Bureau Environmental Officer _____ Date _____
Carl Gallegos Approved _____
Disapproved _____

USAID/AFR filename _____

CLEARANCE
General Counsel (Africa Bureau) _____ Date _____

ADDITIONAL CLEARANCES
Project Manager _____ Date _____
Ron Bonner, HID

Regional Environmental Officer _____ Date _____
Charlotte Bingham, REDSO/ESA

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA

Program Number
Project Number 663-0020-G-00-5501-00
Country/Region Ethiopia
Program/Project Title The Ethiopian NGO Sector Enhancement Initiative

1 0 BACKGROUND AND PROJECT DESCRIPTION

1 1 Background

In November 1994, the Mission received an unsolicited concept paper from the U S registered PVO, PACT The concept paper was reviewed by the Mission Project Review Committee (PRC) using criteria and adapting procedures presented in the AFR/ONI Guidance dated 10/8/92 on unsolicited proposals The PRC determined that the concept paper was acceptable and PACT was asked to develop a full proposal. The overall goal of PACT's Ethiopian NGO Sector Enhancement Initiative, as stated as that time, was to strengthen the capacity of Ethiopian NGOs by providing or upgrading their skills in order for them to play an effective role in the economic development and democratic evolution of the country

1.2 Current Activity Description

The goal for the Initiative is to strengthen the capacity of Ethiopian NGOs, as noted above PACT will do this through a program of training and technical assistance in organizational development, targeted training and technical assistance, mentoring and tutorial guidance for individual NGOs, and possibly the establishment of an NGO training and resource center PACT will also assist and encourage a positive environment for local organizations to work together with public sector institutions

PACT's program focuses on four major sectors rural development/food security, education, democracy and governance/human rights, and orphans and street children Under this activity, USAID grant financing to PACT supports training and technical assistance activities, financing for Strategic Action Grants, conduct of organizational needs assessments and mentoring and tutorial guidance of Ethiopian NGOs

The Initiative will be financed under a cooperative agreement awarded to the U S registered PVO, PACT Inc The bulk of the funding will be used to finance technical assistance, staff support and training to strengthen PVO/NGO capacities to execute development programs in Ethiopia. International Institute of Rural Reconstruction (IIRR), a US-based PVO, implements the food security/rural development component of the Ethiopian NGO Sector Enhancement Initiative The project will also include a Strategic Action Grants (SAG) component with an LOP amount of $800,000 out of a total cooperative agreement cost of approximately $3 7 million. (Note Total authorized LOP funding will be set at $5 million.) The purpose of the SAG component is to strengthen an organization's ability to develop and deliver an effective program that responds directly to local needs The SAG aims to strengthen an NGO's capacity (organizational, technical, decision making, administration, etc) and provides the NGO an opportunity to gain experience in both project and grant management. An indirect purpose of the SAG will be to stimulate or expand critical, innovative, field activities relevant to the Initiative's areas of emphasis

PACT has identified three categories of the SAG component under which grants will be awarded

- Personnel Grants to assist qualifying NGOs to employ needed personnel A Personnel Grant could for example contribute to the cost of an Accountant to work with an NGO for a fixed period of time
- Commodity Grants to enable NGOs to acquire needed office facilities and equipment. For example, such a Grant could be used to purchase a computer and train NGO staff in its use
- Activity Grants to provide funding to NGO projects and activities Illustrative uses of the Activity Grant mechanism are external evaluation of NGO development programs, an NGO resource and/or learning centers NGO networking; planning and design of a field project, workshops, training, seminars, etc on relevant development issues, project implementation costs, for example a literacy program for rural women or non-formal education for out of school girls model and innovative micro-credit program for poor women, youth, etc , and model agroforestry and soil and water conservation projects

By and large, the SAG program will finance personnel, equipment, documentation preparation/purchase training and workshops Grants classified as "Activity Grants" (probably less than $15,000 each) can be used to fund a range of activities, including the implementation of community development activities in the Initiative's focus areas

1.3 Purpose and Scope of Amended IEE

The purpose of this amended IEE is to revise the 1995 IEE, which provided a process for grant and subgrant review according to practices in effect at that time, to comply with the processes and procedures set out in *Environmental Guidelines for Small-Scale Activities in Africa* (Section 5 3, June 1996) and State 257896 Cable USAID/Africa Bureau has developed these procedures specifically for undertakings like the Ethiopian NGO Sector Enhancement Initiative that encompass a variety of activities that can be undertaken by several implementing agents, such as various NGOs These procedures are consistent with USAID's environmental regulations (22 CFR Part 216) and enable increased responsibility for approval of environmental documentation to USAID/Ethiopia.

This amended IEE applies to any **new** activities and those for which environmental documentation has not been prepared or any activities for which a **deferral** (under the original IEE) is still outstanding

2 0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Because not all locations for future interventions covered under this IEE are known and because of the variety of environmental situations encompassed by potential activities, this IEE provides neither comprehensive nor detailed baseline environmental information. The information in this section is derived from *The National Conservation Strategy* (Ministry of Natural Resources Development and Environmental Protection, December 1994) and the Ethiopian Forestry Action Program (EFAP, December 1994) Any statistics or percentages cited below should be taken as approximate, as some of the data upon which these and other sources rely may date from a period when Eritrea was included in the statistics More detailed information can be found in the Ethiopia National Conservation Strategy (National Environment Action Plan)

Widespread poverty (estimated GNP per capita of $120 per year) is made worse by periods of serious drought In past years, there has been negative economic growth Recovery is slow as a consequence of economic policies, destruction of infrastructure and loss of natural assets due to environmental damage The annual population growth rate has been estimated at 3 3%

Ethiopia is a country of high altitude with both mountainous and lowland areas supporting both agricultural and pastoral populations Ethiopia's land surface approaches 110 million hectares Highlands above 1500 meters (m) constitute about 45%, which are inhabited by four-fifths of the population. Here volcanic soils, relatively fertile and deep, and a growing period which exceeds 180 days over 75% of the area permit a wide range of farming and land use systems Below 1500 m are the lowlands of the northwest, east and south, more or less free of tsetse fly, these semi-arid and arid areas support nomadic pastoralists, who also cultivate maize and sorghum on plains watered by flash floods In the southwest and west, the tsetse-infested humid and sub-humid lowlands are sparsely populated by shifting cultivators, although there are some large irrigated farms as well Approximately 50% of Ethiopia's land is estimated to be non-arable with limited growing periods and shallow and/or stony soils Another 18% is either steep or considered marginal

Historical research has indicated that, from 1500 to the present, Ethiopia's forests were most extensive during the 19th century Deforestation accelerated towards the beginning of this century, in 1960 closed natural forest was estimated to cover about 3 4% of the country More recently, high forest was estimated to cover about 4 4%, an indication of the lack of accurate statistical data. Plantation forestry, based on estimates of the Forestry Action Programme, accounts for 95,000 ha in industrial plantations and 35,000 ha in peri-urban plantations Rapid deforestation is caused by an escalating demand for fuelwood and land for cropping and grazing

The groundwater potential of the country is not known with great certainty While estimates indicate approximately 2 9 billion cubic meters, only a fraction of this resource is in use, typically for local water supplies The annual runoff from the major drainage basins is estimated at about 111 billion cubic meters of which nearly three-quarters goes into rivers flowing into Sudan, Egypt, Kenya and Somalia. The irrigation potential of 3.5 million ha has less than a 5% utilization The hydroelectric generation potential is less than 2% utilized.

Soils in the Ethiopian highlands have an inherently high fertility, nevertheless, there is a very low level of fertilizer use to replace nutrients The steep and dissected terrain, coupled with a high intensity rainfall, have led to accelerated soil erosion Reduction in soil depth and in moisture-holding capacity compounds the problems of drought in those areas of the country where rainfall

is low and variable

The livestock population of Ethiopia is considered the largest in Africa. Livestock are an integral part of most farming systems and the mainstay of pastoralists Those regions where the greatest number of livestock live are heavily cultivated for crop production and as a result are largely deficient in livestock feed resources other than agricultural residues In general, the country is overgrazed and stocked beyond its carrying capacity The burning of crop residues and dung for fuel is placing further pressure on grazing areas

Because of diverse ecological conditions, Ethiopia supports a wide variety of flora and fauna. About 12% of the plants are considered endemic, particularly in the high mountains and in the Ogaden In addition to its natural fora, Ethiopia has historically been an important center of crop genetic diversity The Plant Genetic Resources Center of Ethiopia has over 53,000 accessions of 100 crop types, it is working with farming communities to maintain *in situ* traditional genetic-pool holdings that can be propagated free from the genetic alteration imposed by modernization of agricultural practices Ethiopia also has high faunistic diversity, particularly with regard to endemic birds, mammals and amphibians Ethiopia is considered the richest in avifauna of all mainland Africa. Although many areas have been designated as national parks, wildlife sanctuaries and reserves or controlled hunting areas, only two areas (national parks) have been gazetted. Designated areas, however, are completely absent from the most productive, thus the most threatened, habitat, i e , moist evergreen forest and dry evergreen forest.

Ethiopia has a rich cultural heritage, including some of the most important historic and pre-historic archaeological sites in the world, along with its historic structures, these resources are attracting increasing numbers of tourists

In general, land, water and forests have deteriorated to a low level of productivity The human and livestock populations are growing with a consequent depletion of the natural resource base This pressure is most intense in the more productive highlands Both the National Conservation Strategy and the Forestry Action Program conclude that current levels of exploitation are not sustainable

3 0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

PACT's USAID-supported activities could entail support for a variety of interventions, such as 1) modest infrastructure, 2) small or micro agricultural-related projects, such as improving agricultural production through improved techniques irrigation or drainage of fields, diversification of crops, seed banks, grain storage, promotion of improved plant varieties or credit schemes, 3) agro-processing, such as animal feed or oil pressing, 4) animal husbandry, such as better pasture management or support to improve animal health, 5) aquaculture, 6) agroforestry, 7) watershed or forest management and reforestation, 8) other small or micro-development activities to enhance community development in other sectors, and 9) training, capacity development or other organizational development and educational or training activities, including personnel and commodities

The physical and topographic conditions, climate, soils, and ecosystems as well as social and economic characteristics that could be encountered are quite variable Because the specific characteristics and locations of these activities are not definitive, the potential for adverse environmental impacts cannot be excluded, until additional information about project design and location becomes available Each, therefore, requires environmentally sound-design and review to determine the specific nature and magnitude of potential impacts Activities do share the common characteristic of being small in scale Because they could be located in any geographic area, in both rural and urban areas, cumulative, adverse environmental effects of Initiative-assisted activities would be insignificant, although cumulative impacts within the context of other development in a particular setting could not be excluded.

While it is expected that the potential for environmental impacts would occur as a result of the SAG component, in particular the Activity Grants category, provisions of 22 CFR 216 2(c)(2)(i) and (xiv) may apply to education, technical assistance, or training, if these include activities directly affecting the environment or to studies, projects or programs intended to develop capability to engage in development planning, if they could result in activities directly affecting the environment.

4 0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

4 1 Recommended Planning Approach

Often, the development activities proposed for support are typically presented and considered as discrete interventions, in isolation from other planned community developments This linkage argues strongly for the adoption of an integrated approach towards

activity planning and implementation Although an integrated approach towards program planning and management is more complex and time-consuming "up-front," it will reap significant dividends over the longer term in the form of more cost-effective, sound and sustainable community investments and improved natural resources management. For maximum efficiency and effectiveness, these review procedures are intended to be applied within the context of development plans, natural resource management plans or land use plans developed for the areas in which the activities will take place

4.2 Environmental Screening and Review

These environmental screening and review procedures specify how activities, including grants and subgrants under the Ethiopian NGO Sector Enhancement Initiative, will be examined on an individual basis in order to comply with the determinations (see Section 5) of this IEE in accordance with Reg 216, Section 216 3(a)(2) These procedures are intended to result in environmental accountability and soundness, by requiring that USAID/Ethiopia put in place specific mechanisms to promote environmental review capacity and other environmental capacity for the implementing partners To ensure that interventions are designed in a sound and sustainable manner (see Section 4 1), the Mission Environmental Officer (MEO) and/or USAID Project Manager will work with the appropriate implementing partners to achieve compliance with these procedures

PACT is the primary implementing partner of the Initiative For the SAG component, there is an Advisory Committee, composed of PACT staff and representatives of a variety of Ethiopian NGO implementing partners IIRR, as noted in Section 1.2 implements the food security/rural development component of the Initiative

These procedures are based upon utilization of a Screening Form, presented in Attachment 1 This form is consistent with the "Environmental Screening Form for NGO/PVO Activities and Grant Proposals" contained in the Africa Bureau *Environmental Guidelines for Small-Scale Activities in Africa* USAID/Ethiopia will facilitate the refinement of this form with PACT and the REDSO REO/REA to meet project needs and to incorporate, where appropriate, information that will serve to identify any need for environmental assessment in accordance with Ethiopia's environmental assessment policy and future legislation

Adherence to the procedures in this IEE, it must be emphasized, cannot be considered in lieu of Ethiopian requirements or vice versa Efforts will be made, however, in the refinement of the Screening Form to dovetail respective assessment information requirements to the maximum extent allowable

This IEE does not cover pesticides or other activities involving procurement, use, transport, storage or disposal of toxic materials, and any situation dealing with such will require an amended IEE, except to the extent covered in Category 2 of the Screening Form attached

Activities, including grants and subgrants, will be individually screened using the Screening Form, which utilizes a four-tier categorization process consistent with Africa Bureau 's *Environmental Guidelines*, as defined below

Category 1 Activities that would normally qualify for a categorical exclusion under Reg 216 (e g , community awareness initiatives, training at any level, provision of technical assistance, controlled experimentation exclusively for the purpose of research and field evaluation which is confined to small areas and carefully monitored, etc) Certain, specifically defined, small-scale activities entailing rehabilitation of water points and construction or rehabilitation of facilities have also been placed in this category

Category 2 Activities that would normally qualify for a negative determination under Reg 216, based on an environmentally-sound approach to the activity design and incorporation of appropriate mitigation and monitoring procedures For example, the design followed, and the manager has access to and will follow, a series of guidelines for the design of small-scale environmentally-sound activities in forestry, natural resource management, infrastructure, etc

Category 3 Activities that have a clear potential for undesirable environmental impacts and typically under Reg 216 require an Environmental Assessment, such as those involving land development, planned resettlement, penetration road building, substantial piped water supply and sewage construction, large-scale irrigation projects, and projects involving the procurement and/or use of pesticides, or of large-scale or area-wide application of pesticides All activities listed in Reg 216 (Sect. 216.2(d)(1)) are automatically included, unless they are small-scale and qualify for a negative determination in accordance with the criteria listed under Category 2

Category 4 This category groups activities that either USAID cannot fund or for which specific findings must be made in an Environmental Assessment prior to funding Interventions that are likely to jeopardize a critical habitat for threatened or endangered species or degrade a protected area must be placed in this category Category 4 lists activities that trigger

provisions of Sections 118 or 119 of the Foreign Assistance Act, which generally relate to degradation of national parks or protected areas, introduction of exotic species, or effects on tropical or undegraded forest lands

PACT will employ the Screening Form [Attachment 1, to be refined as needed in consultation with the REDSO/REO or REA] and the Environmental Review Reports prepared as a result of the categorization process to evaluate activities and/or proposals Preferably, the direct or actual implementor of an activity will prepare the forms and the environmental reviews, which will be reviewed by PACT prior to submittal to USAID/Ethiopia. Proposals seeking support from the Initiative must also comply with any Advisory Committee approval criteria and review procedures, which will also include this requirement for environmental screening and review, as well as any other PACT or USAID/Ethiopia requirements designed to ensure developmentally sound and sustainable activities for the Initiative

An Environmental Review Report shall be prepared for all Category 2 activities The MEO or Mission Director, or Acting Director, on behalf of USAID/Ethiopia, shall be responsible for clearances on the category determination and Environmental Review Reports It is assumed that the majority of activities will fall within Categories 1 and 2, and will, therefore, be approvable locally by USAID/Ethiopia without further external review This increased responsibility, without regard to dollar amount of activities, is predicated on the assumption that appropriate and environmentally sound implementation and environmental monitoring and mitigation procedures will be in place The MEO, should he/she have questions, will pass Category 2 activities and their reviews to the REO and Bureau Environmental Officer (BEO) for consultation An Environmental Review Report shall also be prepared as the first step for all Category 3 activities to help the REO and BEO determine if an Environmental Assessment is required. While an Environmental Review Report may be prepared for Category 4 activities, it is recommended that developers of activities and proposals consult, through PACT, with the USAID MEO and Project Manager before preparing elaborate documentation. All Category 3 and 4 activities (if there are any) shall be subject to additional environmental evaluation, as deemed appropriate, in consultation with the BEO and REO, and shall be passed on to the Regional and Bureau Environmental and Legal Officers for further review and clearance

Prior to the approval of an activity, results of the environmental categorization must be available and considered For Category 2 projects, Environmental Review Reports, including MEO review and, if needed, REO or BEO review, must be performed prior to funding For any Category 3 or 4 activities, approval cannot be made until the Environmental Review and any additional environmental documentation as determined by the BEO have been prepared and cleared PACT may, if it desires, categorize or review categorization of activities, based on use of the screening form, prior to approval to a proposer to proceed with final design This procedure would allow activities that are in Category 1 (no environmental review required) to be carried out and for the proposer to undertake appropriate environmental documentation according to the procedures for Category 2, 3 or 4 activities Hence such awards shall contain clauses stating that funding of Category 2, 3 or 4 activities is contingent upon findings, recommendations and clearance of the environmental documentation

The MEO and/or Project Manager shall on a routine (semi-annual) basis pass to the REO and BEO an updated summary of activities and the results of the environmental categorization and review process, in order to keep them apprised of the type/nature, scale, funding levels and implementation status of the individual activities approved under the process described in this IEE and any corresponding mitigation and monitoring requirements Reference to this process will also be made in the Mission's R4 submittal to AFR/W

4.3 Promotion of Environmental Review and Capacity Building Procedures

The procedures described above and incorporated within the Screening Form are intended to ensure environmental accountability and soundness, on the assumption that the Mission has the following additional elements in effect to build environmental capacity with PACT and its NGO partners

- PACT and its appropriate partners will help design, conduct, participate in, and apply environmental assessment and management training, in conjunction with USAID and Ethiopian resource organizations and agencies, such as the Regional Environmental Assessment Training Course and pursue follow-up training to assist these partners in properly fulfilling the screening and review requirements in conjunction with concerned Ethiopian organizations and agencies,

- PACT and its appropriate partners will also be encouraged to apply appropriate Ethiopian environmental assessment policies and procedures, and

- A monitoring and evaluation process will be put in place and used by PACT and its appropriate partners, in collaboration with any concerned Ethiopian authorities, and USAID project management.

4 4 Environmental Responsibilities

USAID/Ethiopia assumes responsibility for environmental review and decision making for all USAID-assisted Ethiopian NGO Sector Enhancement Initiative activities as outlined below

- Through PACT, and with the assistance of appropriate partners, proposers will submit proposals that take into consideration potential environmental impacts and their mitigation, including avoidance, and will design the activities with an environmental monitoring system in place

  The proposer and PACT will use the Screening Form to categorize proposals, and the MEO will review and pass on to the REO and BEO any Category 3 or 4 and, as he/she determines, some Category 2 activities

- The proposer/implementing agent for an activity, with the assistance of appropriate partners, will ensure implementation of agreed-upon mitigating measures and environmental impact monitoring

  USAID/Ethiopia's MEO and the Project Manager will be ultimately responsible for monitoring environmental impacts of all project-financed activities, as further specified below (Section 4 5)

- Periodic visits of the REO or REA will also be requested for advice, refresher training and validation that environmental processes are in place

4.5 Monitoring, Evaluation, and Mitigation

An **environmental monitoring, evaluation and mitigation process** will be established and used by the implementing partners in collaboration with USAID USAID-supported activities shall incorporate appropriate mitigation and monitoring procedures as listed below

- PACT and its partners will utilize the *Environmental Guidelines for Small-Scale Activities in Africa* to assist them in determining what potential impacts should be of concern for different types of development activities in various settings Using the information from this and other documents cited therein (advice should be solicited from the REO or REA), PACT, with the proposer, will determine which impacts to mitigate and monitor for the particular development activity

  PACT and its partners must identify in each proposal and in the accompanying environmental review reports all proposed environmental mitigation and monitoring requirements

- Once the environmental review reports are approved, the mitigative measures and monitoring procedures stated in the environmental review report shall be considered a requirement.

- The implementing agent/partner with assistance of other appropriate partners, shall be responsible for implementation of agreed-upon mitigation measures and monitoring of impacts

- All periodic reports of PACT's implementing partners, under these procedures, to PACT and of PACT to USAID/Ethiopia shall contain a section on environmental impacts, success or failure of mitigative measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigative measures or monitoring procedures

SAID/Ethiopia is ultimately responsible for assuring conformity with the procedures spelled out above, including environmental categorization and review procedures With particular respect to monitoring, evaluation and mitigation, the Mission is responsible for

- Monitoring and evaluation of activities after implementation with respect to environmental effects that may need to be mitigated, a process which should be integrated into the Mission's pertinent Performance Monitoring and Evaluation Plan,

- Review of PACT and other implementing partners' reports with respect to results of environmental mitigation and monitoring procedures,

- Incorporating into Mission field visits and consultations with implementing partners periodic examination of the environmental impacts of activities and associated mitigation and monitoring (assistance of the REO or REA in preparing guidelines or assisting with the monitoring and evaluation can be solicited), and

- Reporting on implementation of mitigation and monitoring requirements as part of the summary of activities and their status that is passed to the REO and BEO

5 0 SUMMARY OF FINDINGS

This amended Initial Environmental Examination (IEE) brings the 1995 IEE into conformity with the Africa Bureau environmental procedures for umbrella activities It also reflects new conditions regarding placing increased environmental review responsibility with Missions for PVO/NGO umbrella type projects (Cable STATE 257896)

Environmental Determinations

Based on environmental review procedures promotion of environment review capacity building, and monitoring, evaluation and mitigation procedures specified in this IEE, to which the Mission commits itself, the following environmental determinations are recommended

1 A **Categorical Exclusion** is recommended for project-financed technical assistance, training and education, institutional strengthening, regional communications and information exchange activities that have no physical interventions and no direct effects on the environment pursuant to 22 CFR 216 2(c)(1)(i) and 216 2(c)(2)(i), (iii) and (v) **The screening form will be used to confirm this determination for each activity** This categorical exclusion does **not** apply to education, technical assistance or training if such include activities directly affecting the environment, such as construction of facilities, per 216.2(c)(2)(i), **nor** to studies, projects or programs intended to develop the capability of recipient countries to engage in development planning when designed to result in activities directly affecting the environment, per 216.2(c)(2)(xiv)

2 A **Negative Determination with Conditions** is recommended for all other activities entailing community development This IEE specifies a set of steps, in accordance with the Africa Bureau's *Environmental Guidelines for Small-Scale Activities in Africa*, to ensure adequate environmental review of USAID-supported activities, including capacity-building elements This negative determination is also conditioned on the provision of supplemental project technical assistance and training support to augment existing efforts These capacities will be developed and implemented in close collaboration with USAID/Ethiopia and the Initiative's partners

Conditions

USAID's support for the Ethiopian NGO Sector Enhancement Initiative will follow a formalized environmental review process for its activities A key component of this review process is the use of a Screening Form (Attachment 1) to categorize activities, and review and screen them for potential environmental impacts Use of this screening form and the categorization process are recommended in accordance with the AFR *Environmental Guidelines for Small-Scale Activities in Africa*

USAID/Ethiopia assumes responsibility for environmental review, with clearance by the Mission Environmental Officer (MEO)

or USAID Director or Acting Director in accordance with the environmental review procedures outlined herein for Category 1 and Category 2 activities All activities classified as Category 3 or 4, based on the procedures for categorization and review (in the unlikely event there are any), and possibly some in Category 2, at the discretion of the MEO, will be subjected to additional environmental assessment, as deemed appropriate, in consultation with the Regional Environmental Officer (REO) and Bureau Environmental Officer (BEO), and will be passed to the Bureau and Regional Environmental and Legal Officers for further review and clearance

PACT may, if it desires, categorize or review categorization of activities, based on use of the screening form, prior to approval to a proposer to proceed with final design. This procedure would allow activities that are in Category 1 (no environmental review required) to be carried out and for the proposer to undertake an appropriate environmental review in accordance with the procedures for Category 2, 3 or 4 activities No activities classified in Category 2, 3 or 4 will be funded until the environmental documentation required by this IEE has been prepared, reviewed and cleared Hence, such awards shall contain clauses stating that funding for such activities is contingent upon adherence to the findings and clearance of the environmental documentation.

Partners implementing the Initiative's USAID supported activities will help design, conduct, participate in and apply appropriate environmental assessment/design and implementation/mitigation procedures for each activity The Project will support appropriate environmental training and will do follow-up training to assist these partners in properly fulfilling this review requirement, in conjunction with concerned Ethiopian organizations and agencies

An environmental monitoring, evaluation and mitigation process shall be established and used by the implementing partners, including grantees, in collaboration with USAID Up-dated summaries of activities and their status based on the procedures described in this IEE, will be periodically submitted to the REO and BEO to keep them apprised of the type, scope and implementation status of the activities and their corresponding mitigation and monitoring requirements Reference to this process will be made in the Mission's annual R4 submittal to AFR/W

This IEE does not cover pesticides or other activities involving procurement, use, transport, storage or disposal of toxic materials and any situation dealing with such will require an amended IEE

Adherence to the procedures in this IEE are not in lieu of any environmental assessment procedures required under Ethiopian law, nor can adherence to Ethiopia's environmental procedures be substituted for compliance with the procedures in this IEE Efforts will be made, however, in the development or revisions of the Screening Form to dovetail respective assessment information requirements to the maximum extent allowable

ENVIRONMENTAL SCREENING/REPORT FORM FOR NGO/PVO ACTIVITIES AND GRANT PROPOSALS

[see sample ESF in Annex F]

Annex B.4

DRAFT TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET

***DRAFT* of 11/24/1997**

Title of DAP/PAA Program Activity Sustainable Food Security Program

CS Name, Country/Region CARE/Peru

Funding Period FY 1996 - 2000

Resource Levels Commodities monetized $
202 (e) grant $ 0

Prepared by Name _____ Date _____
Title _____

Environmental Media and/or Human Health Potentially Impacted
air ___ water _✓_ land _✓_ biodiversity (specify) _____ human health ___ other ___ none ___

Environmental Action(s) Recommended

_✓_ 1 *Categorical Exclusion(s)* (six)

_✓_ 2 Initial Environmental Examination

_✓_ *Negative Determination(s)* (ten) no significant adverse effects expected regarding the proposed activities, which are well-defined over life of the DAP/PAA
_✓_ without conditions (no special mitigation measures needed, normal good practices and engineering will be used),
_✓_ with conditions (special mitigation measures specified to prevent unintended impact)

_____ *Positive Threshold Decision* IEE confirms potential for significant adverse effects of one or more activities Appropriate environmental review needed or conducted

_____ EA to be / being / has been conducted (circle which)

_____ *Deferral* one or more elements not yet defined, will not be implemented until amended IEE is approved

Summary of Findings

The two projects, ALTURA-2 and NIÑOS , were disaggregated into 16 components namely

1 ALTURA-2 **Categorical Exclusions** are recommended for Community Promotion and Training, Information System on Market Situations and Prices of Harvested Produce, and PL 480 Food Communities Distribution **Negative determinations without special conditions** are recommended for Agroforestry Plantings, Forestry Plantings Maintenance, and Protection of Vulnerable Areas against Erosion. Finally, **negative determinations with conditions** are recommended for Seedling Production, Block Forestation, Cropland Improvement Through Soil Conservation, Upgrading of Marginal Land for Cropping Purposes, Food Crop Production, and Rehabilitation of Community Access Roads and Pathways

2 NIÑOS **Categorical exclusions** are justified for Training; Nutritional and Health Surveillance, and Income Generation A **negative determination with conditions** is recommended for Community Infrastructure Support. Thus, six Categorical Exclusions and ten Negative Determinations were recommended under Regulation 216 A summary is provided in the Annex, Table 1

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USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED

Clearance

Mission Director _____ Date _____

Food For Peace Director _____ Date _____

Concurrence

Bureau Environmental Officer _____ Date _____
(BHR)

Approved _____

Disapproved _____

Optional Clearances

FFP Officer _____ Date _____

Mission Food Aid Manager _____ Date _____

Mission Environmental Officer _____ Date _____

Regional Environmental Officer _____ Date _____

Geographic Bureau Environmental Officer _____ Date _____

General Counsel _____ Date _____

INITIAL ENVIRONMENTAL EXAMINATION
11/24/97 DRAFT -- FOR INFORMATION PURPOSES ONLY[1]

DAP/PAA/ACTIVITY DATA
Program/Activity Number
CS Name/Country/Region CARE/Peru. Andean region

1 BACKGROUND AND ACTIVITY DESCRIPTION

1 1 Background

Limited availability of appropriate cropland, loss of arable land due to erosion, lack of capital to purchase seeds, frequent crop disasters due to adverse climatic conditions (e g , droughts, frosts, hailstorms and/or floods), lack of access to markets, and weak community organization all contribute to the extreme poverty inherent in the poor areas of Peru where rural households depend completely on crops and livestock for sustenance

The objective of CARE/Peru's Sustainable Food Security Program (SFSP) is to ensure that target populations residing in extreme poverty have stable access to adequate and sustainable food supplies This objective is attained in two ways a) by increasing access to a stable and adequate food supply through agricultural production and/or household income, and b) by improving nutrition—particularly in vulnerable populations of children under five—through direct distribution of food and improved nutrition practices The SFSP includes two projects Technological Alternatives for Land Use and Food Security (ALTURA-2) and Sustainable Child Nutrition (NIÑOS) that addresses the above difficulties and concerns The two projects are approved for a full five-year period.

1.2 Description of Activities

Both the ALTURA-2 and NIÑOS Title II-supported projects utilize a cross-sectoral approach The ALTURA-2 project teaches families how to improve soil quality and increase agricultural productivity, whereas the NIÑOS project trains mothers how to better feed their children. ALTURA-2 works with the Ministry of Agriculture's (MOA) National Program for Watershed Management and Soil Conservation (PRONAMACHCS) as its principal partner Thus, care is taken that each project is implemented in close coordination with its governmental counterparts, and with the active participation of local communities, non-governmental organizations (NGOs) and municipal governments In addition to Title II food commodities, ALTURA-2 provides agricultural inputs and extension services in agroforestry, soil conservation and crop production Moreover, the MOA has adopted the Agroforestry Extension Manual for distribution to all of its extension staff and decided to replicate CARE/Peru's Integrated Pest Management (IPM) techniques and extension methods nationwide through PRONAMACHCS

The NIÑOS project, on the other hand, works closely with the Ministry of Health (MOH) by a) providing training to MOH personnel and community promoters, and b) by aiding the MOH in providing requisite health services, while organizing and creating a demand for such services from indigent po[illegible]s The NIÑOS project concentrates its efforts in 120 communities in extremely poor rural areas of Piura, Puno, Ancash [illegible]d C[illegible]arca through increasing mothers' knowledge and skills regarding improvement of health and nutrition of children Such [illegible]s carried out through monthly group meetings and periodic home visits

1.3 Purpose and Scope of IEE

This IEE accompanies the FY 1999 PAA and addresses the programs of the FY 1996 DAP for the CARE/Peru Sustainable Food Security Program, thus representing the third year of the present DAP's implementation

[1] Preliminary draft produced in USAID/W from incomplete documentation by the BHR BEO and presented as a possible approach to preparing Title II IEEs, for discussion at the Ghana Title II Environmental Compliance workshop, Dec 7-12, 1997 To be completed by the Cooperating Sponsor & USAID/Peru

2 COUNTRY AND ENVIRONMENTAL INFORMATION

[to be completed]

3 EVALUATION OF PROGRAM ACTIVITIES AND RECOMMENDED ENVIRONMENTAL ACTIONS

What follows is a detailed analysis of individual sub-components of the ALTURA-2 and NIÑOS projects (the numerical notations correspond to CARE/Peru's system for identifying project components or activities and are maintained here for clarity)

3 1 (a) ALTURA-2 Project

This project's service delivery and community-level activities comprise six components (1) community promotion and training, (2) tree planting, (3) soil conservation, (4) food crop production, (5) marketing of harvested produce, and (6) donated food commodity distribution

During FY 98, for example, ALTURA-2 will work with 64,800 rural families who reside in 1,440 communities in eleven departments The total budget for FY 98, which includes contributions from USAID Title II, the European Union, CARE/Atlanta and the GOP, amounts to $ 10 67 million, with the USAID portion amounting to 51 percent Relative to USAID Regulation 216, CARE/Peru describes ALTURA-2 as follows

- It is not a river basin development project,
- It does not promote irrigation or drainage schemes on any scale, with no large-scale land leveling,
- It promotes food crop production on small parcels previously improved through soil conservation and/or agroforestry tree planting, participant communities are supported with seed and fertilizer, the use of chemical pesticides is strictly forbidden, farmers are encouraged to apply integrated pest management (IPM) techniques by training family members and providing them with a set of non-chemical options that effectively combat pests [predominantly potato], and
- It does not build penetration roads or secondary/tertiary roads of any type, only existing tertiary roads and pathways are rehabilitated and repaired

Table 1 is a synopsis of Environmental Decisions for components under CARE/Peru's DAP/PAA

(1) Community Promotion and Training (Component 1 0) This component addresses participant family members—men and women—through specialized courses, brief (2-5 hours) training sessions and cross-visits among participating communities This training has a practical orientation towards enriching farmers' knowledge, altering their attitudes and developing their practical skills, and addresses subjects such as community organization, discussion/promotion of project purpose/activities, seedling nursery techniques, technical aspects of tree planting and maintenance, soil conservation techniques, food crop husbandry and production, IPM methods, and the administration of revolving input funds

Recommended Environmental Action (Component 1 0)

Sub-activities under this component qualify for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(i) as the actions supported under the activity will have no effect on the environment as "[e]ducation, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc)' represent types of activities generally excluded from further environmental review

(2) Seedling Production (Component 2 1) The propagation of forestry and fruit species is conducted in 1,440 communities-level nurseries, with an average capacity of 8,000 seedlings per year each, for a total of 9 2 million seedlings in FY 98 A community nursery generally covers a community-owned plot measuring 30x35 meters According to PRONAMACHCS norms, community tree nurseries must be located on flat plots Where none exist, the community must construct bench terraces prior to installing the nursery, in order to ensure optimal irrigation of seedlings under production and to avoid erosion caused by nursery irrigation No chemical pesticides are employed in community nurseries

Recommended Environmental Threshold Decision (Component 2 1) **A negative determination with conditions** per 22 CFR 216 3 (a)(2)(iii) is recommended for this component *"Only flat plots will be utilized for community nurseries abiding by accepted norms developed by PRONAMACHCS and no chemical pesticides will be allowed Moreover USAID/Lima and CARE/Peru will closely monitor implementation and will utilize as reference the USAID Bureau for Africa, 'Environmental*

2. COUNTRY AND ENVIRONMENTAL INFORMATION

[to be completed]

3 EVALUATION OF PROGRAM ACTIVITIES AND RECOMMENDED ENVIRONMENTAL ACTIONS

What follows is a detailed analysis of individual sub-components of the ALTURA-2 and NIÑOS projects (the numerical notations correspond to CARE/Peru's system for identifying project components or activities and are maintained here for clarity)

3 1 (a) ALTURA-2 Project

This project's service delivery and community-level activities comprise six components (1) community promotion and training, (2) tree planting; (3) soil conservation, (4) food crop production, (5) marketing of harvested produce, and (6) donated food commodity distribution.

During FY 98, for example, ALTURA-2 will work with 64,800 rural families who reside in 1,440 communities in eleven departments. The total budget for FY 98, which includes contributions from USAID Title II, the European Union, CARE/Atlanta and the GOP, amounts to $ 10 67 million, with the USAID portion amounting to 51 percent. Relative to USAID Regulation 216, CARE/Peru describes ALTURA-2 as follows

- It is not a river basin development project;
- It does not promote irrigation or drainage schemes on any scale, with no large-scale land leveling;
- It promotes food crop production on small parcels previously improved through soil conservation and/or agroforestry tree planting; participant communities are supported with seed and fertilizer; the use of chemical pesticides is strictly forbidden, farmers are encouraged to apply integrated pest management (IPM) techniques by training family members and providing them with a set of non-chemical options that effectively combat pests [predominantly potato], and
- It does not build penetration roads or secondary/tertiary roads of any type, only existing tertiary roads and pathways are rehabilitated and repaired.

Table 1 is a synopsis of Environmental Decisions for components under CARE/Peru's DAP/PAA.

(1) Community Promotion and Training (Component 1 0) This component addresses participant family members—men and women—through specialized courses, brief (2-5 hours) training sessions and cross-visits among participating communities This training has a practical orientation towards enriching farmers' knowledge, altering their attitudes and developing their practical skills, and addresses subjects such as community organization, discussion/promotion of project purpose/activities, seedling nursery techniques, technical aspects of tree planting and maintenance, soil conservation techniques, food crop husbandry and production, IPM methods, and the administration of revolving input funds

Recommended Environmental Action (Component 1 0)

Sub-activities under this component qualify for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(i) as the actions supported under the activity will have no effect on the environment as "[e]ducation, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc)" represent types of activities generally excluded from further environmental review

(2) Seedling Production (Component 2 1) The propagation of forestry and fruit species is conducted in 1,440 communities-level nurseries, with an average capacity of 8,000 seedlings per year each, for a total of 9 2 million seedlings in FY 98 A community nursery generally covers a community-owned plot measuring 30x35 meters According to PRONAMACHCS norms, community tree nurseries must be located on flat plots Where none exist, the community must construct bench terraces prior to installing the nursery, in order to ensure optimal irrigation of seedlings under production, and to avoid erosion caused by nursery irrigation. No chemical pesticides are employed in community nurseries

Recommended Environmental Threshold Decision (Component 2.1) **A negative determination with conditions** per 22 CFR 216.3 (a)(2)(iii) is recommended for this component *"Only flat plots will be utilized for community nurseries abiding by accepted norms developed by PRONAMACHCS and no chemical pesticides will be allowed Moreover, USAID/Lima and CARE/Peru will closely monitor implementation and will utilize as reference, the USAID Bureau for Africa, 'Environmental*

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Guidelines for Small-scale Activities in Africa,' Technical Paper No 18 June 1996 "

(3) Agroforestry Plantings (Component 2 2) These consist of the purposeful combination of trees and crops in order to generate positive interactions among trees, crops, soils and microclimates, thus increasing the production of food crops and pastures, while also providing fuelwood, building materials and tree fruits Trees and shrubs of native, well-adapted species are planted around the small-scale cropping plots typical in the Andes The FY 98 target for agroforestry plantings is 4,049 hectares

This component only involves use of native tree and shrub species that, at worst, minimally alter agro-ecological conditions of cropland already in use, with the effect of reducing erosion normally caused by wind and rainwater runoff that traditionally occurs when cropland is left bare between harvest and subsequent crop sowing Furthermore, agroforestry plantings directly contribute towards the improvement of soils surrounding them by adding organic matter and nitrate from leguminous trees and shrubs

Recommended Environmental Threshold Decision (Component 2.2) A **negative determination** per 22 CFR 216 3 (a)(2)(iii) is recommended for this component, since the proposed action is not considered to have a significant effect on the environment. CARE/Peru should make every use of the USAID Bureau for Africa, "Environmental Guidelines for Small-Scale Activities in Africa," Technical Paper No 18, June 1996, pp 53-55

(4) Block Reforestation (Component 2 3) Block reforestation is promoted on land that is only acceptable for forestry or protection purposes Priority is afforded in areas with steep slopes, hilltops and upper sections of micro-watersheds The wood lots thus established generally cover areas comprising less than two hectares Tree species recommended for this type of intervention include eucalyptus, pine, cypress and casuarina with 2,578 hectares targeted for FY 98

Strict observation of MOA norms will direct proper use of block reforestation on land with potential only as forestry or protection areas per the categories defined by the National Institute for Natural Resources This should eliminate any serious potential competition with alternative uses on the same land. Vegetative cover established in the areas to receive block reforestation acts as an absorbent material by increasing the storage capacity for rainwater with subsequent retardation of erosion and a resultant controlled discharge of regulated quantities of subsoil water to lower hillsides

Recommended Environmental Threshold Decision (Component 2.3) A **negative determination with conditions** per 22 CFR 216.3 (a)(2)(iii) is recommended for this component. *"The block forestation intervention will only be applied to areas with steep slopes hilltops and upper areas of micro-watersheds and will comply with established MOA norms "*

(5) Forestry Plantings Maintenance (Component 2 4) This component concerns the increase of survival rates of both agroforestry and block plantings with the intent to enhance positive interactions between trees and crops This is to be accomplished through appropriate pruning geared towards guaranteeing adequate levels of shade, moisture and nutrients for crops sown adjacent to agroforestry plantings Hedges are to be formed as windbreaks and/or barriers against erosion by runoff In wood lots, maintenance and pruning activities are to enhance the production of quality wood, provide fuelwood at regular intervals and increase pasture yields Forestry maintenance targets for FY 98 are 1,214 hectares No significant negative environmental effects are expected through implementation of this intervention.

Recommended Environmental Threshold Decision (Component 2.4) A **negative determination** per 22 CFR 216 3 (a)(2)(iii) is recommended and considered appropriate for this component as the proposed action will not have a significant effect on the environment.

(6) Cropland Improvement Through Soil Conservation (Component 3 1) This component deals with slopes already used by farmer families as cropland, which are exposed to erosion by wind, water runoff and effects of inappropriate agricultural practices, e g , uncontrolled spate irrigation, crops sown in vertical rows, etc The promotion of construction of either bench or slow-formation terraces is aimed at improving cropland. Bench terraces are constructed for slope angles of less than 45 degrees with platforms of 3x8 meters. A typical smallholder plot entails four or five platforms On the other hand, slow-formation terraces are recommended for slope angles of less than 15 degrees with typical platforms of 7x12 meters and three or four platforms per cropping plot. In FY 98, the target is to improve 2,609 hectares of existing cropland in this manner

Reducing exposure to traditional erosion caused by wind, water runoff and inappropriate farmer practices should improve cropland through the stipulated soil conservation techniques

Recommended Environmental Threshold Decision (Component 3 1) A **negative determination with conditions** per 22 CFR 216 3 (a)(2)(ii) is recommended *"with the condition that technical norms [established by the MOA] for the construction of terraces, which stipulate the types and sizes of terraces according to categories of slope angles, are strictly adhered to Every effort will be made to incorporate concepts for good soil conservation practices found in the USAID Bureau for Africa, 'Environmental Guidelines for Small-Scale Activities in Africa,' Technical Paper No 18, June 1996 '*

(7) Upgrading of Marginal Land for Cropping Purposes (Component 3 2) This activity, while similar to the cropland improvement activity, also promotes the building of bench and slow-formation terraces, but for the purpose of incorporating new, often marginal, land into crop production. Some 1,440 hectares of marginal land are targeted to be upgraded in FY 98

Most of the marginal lands are barren, steep-sloped and possess only thin soil layers after years of wind and water runoff erosion. It is anticipated that strict adherence to detailed norms, approved by PRONAMACHCS, that require that either bench or slow-formation terraces have to be built prior to sowing crops on marginal or steeply sloping angles, will minimize negative environmental effects and reduce soil erosion.

Recommended Environmental Threshold Decision (Component 3.2) A **negative determination with conditions** per 22 CFR 216 3 (a)(2)(iii) is recommended *"with the condition that norms for marginal land terracing, approved by PRONAMACHCS, be strictly followed. Furthermore, if, after a reasonable period of evaluation it becomes apparent that this intervention for upgrading of marginal land is actually leading to increased soil erosion due to alteration of the existing top soil structure and/or the removal of natural vegetation, then the practice will be terminated upon review and concurrence of the USAID/Lima MEO "*

(8) Protection of Vulnerable Areas Against Erosion (Component 3 3) This activity serves to promote the building of infiltration ditches on marginal land with steep/moderate slopes, and the construction of stone walls in erosion-prone areas where gullies have commenced to form and grow Infiltration ditches are surrounded by agroforestry hedges, a combination of interventions with a proven track record for increasing soil capacity to retain runoff and subsoil water 2,880 hectares of vulnerable areas are targeted for production in FY 98

Recommended Environmental Threshold Decision (Component 3.3) A **negative determination** per 22 CFR 216 3 (a)(2)(iii) is recommended and considered appropriate for this activity as the proposed action will not cause a significant effect on the environment.

(9) Food Crop Production (Component 4 0) This activity promotes increased production of food crops on smallholder plots that were previously improved and protected by soil conservation and agroforestry techniques FY 98 will see 1,974 hectares of various food crops sown. The project also provides technical assistance (T/A) through an extension service staff, stimulates the establishment and proper administration of community-level revolving funds of cropping inputs, and includes training in IPM techniques

Title II or other project funds are not employed for supply of chemical pesticides T/A provided by CARE/Peru and PRONAMACHCS focuses on IPM methods as well as contour plowing, which is an important method for reducing and controlling erosion from runoff

Recommended Environmental Threshold Decision (Component 4 0) A **negative determination with conditions** per 22 CFR 216 3 (a)(2)(iii) is recommended. *"These conditions entail establishment of acceptable norms for T/A and training and the Monitoring and Evaluation plan to be prepared for this activity must track and measure impacts of observable farming practices USAID Bureau for Africa, 'Environmental Guidelines for Small-Scale Activities in Africa,' Technical Paper No 18 June 1996 pp 13-21 and 53-67 should be reviewed for applicability "*

(10) Rehabilitation of Community Access Roads and Pathways (Component 5 1) In this activity, a total of 3,755 kilometers of community access roads (tertiary) and pathways--with a maximum length of two kilometers and four meters in width--are planned for rehabilitation and repair Existing road platforms are not to be altered, the exception being drainage ditches on each side, which may require some modification to avoid future damage from excessive quantities of runoff Pathways for pedestrians and mules are no more than two-to-three meters in width including drainage ditches on each side CARE/Peru-approved norms

preclude the construction of new roads (secondary and tertiary) that include the preparation of new platforms and the norms do cover drainage ditch construction on both sides of the road platforms

Recommended Environmental Threshold Decision (Component 5 1) A **negative determination with conditions** per 22 CFR 216 3 (a)(2)(iii) is recommended. *"This negative determination is conditioned as follows Roads associated with the target communities will be rehabilitated/improved through the construction of drainage fields/ditches culverts or drifts and small bridges where necessary Local labor and simple tools will be employed to maximize local input and minimize costs The CARE/Peru operations manager or equivalent in coordination with the government entity responsible for construction and maintenance of highways will have overall responsibility for the rehabilitation of existing roads—all roads rehabilitated will be on existing compacted earthen surfaces no new roads will be constructed without the permission of the MEO*

Impacts and Mitigation Although the reconstruction of earthen roads is expected to be minor certain adverse environmental effects from construction and construction materials can occur Consequently

(a) The majority of materials used will be of local origin and will not contain any hazardous materials Excess construction materials will be recycled wherever possible and disposal of unusable materials will be accomplished in an environmentally safe manner,
(b) Wood stumps and brush removed from the roadway/pathway will be used by the volunteers for firewood and other practical reuses
(c) CARE/Peru will ensure that efforts will be made at road reconstruction sites to avoid/retard soil erosion and will immediately address any potential erosion problems
(d) CARE/Peru will ensure that proper reclamation (i e landscaping and re-planting) is undertaken at all areas used to obtain construction materials (i e gravel/soil and rock) for the road rehabilitation
(e) Re-construction will minimize the use of heavy equipment
(f) CARE/Peru will follow existing roadways except where it may be justified to modify roadway routes slightly in order to 1) achieve a more direct route between two points (i e , to minimize unnecessary curves or slightly align the direction) in the interest of natural resources/energy efficiency, and 2) avoid environmentally significant areas (i e wetlands waterbodies and forest lands) and
(g) CARE/Peru will strictly comply with existing norms for road and pathway rehabilitation

Finally, CARE/Peru will prepare a Monitoring and Evaluation plan for this activity to track and measure impacts of mitigations employed. USAID Bureau for Africa, 'Environmental Guidelines for Small-Scale Activities in Africa ' Technical Paper No 18 June 1996, pp 43-46, should be reviewed for applicability "

(11) Information System on Market Situations/Prices of Harvested Produce (Component 5 2) This component supports the installation and function of an information system designed to disseminate market and price data with the purpose of informing participant farmers on the most appropriate harvest period, cities and particular days as well as sales conditions that favor higher prices for harvested commodities to benefit poor producer families In this way, training in marketing and production will teach poor farmers basic principles of farm management and economics so that sound decisions on production strategies can be made to increase net farm income

Recommended Environmental Action (Component 5 2) This activity qualifies for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(v) as the actions supported under this activity will have no effect on the environment since it entails "[d]ocument and information transfers "

(12) PL 480 Food Commodities Distribution (Component 6 0) Title II funding requested thus far is shown below

FY 96	$ 8 9 million
FY 97	$ 9 0 million
FY 98	$ 9 1 million

Thus, the volume of food (crude vegetable oil) for direct distribution in FY 98 has been reduced from 17 0 k tonnes to 12 2 k tonnes. The monetization plan for Title II commodities, designed and implemented by CARE/Peru, generates sales proceeds to support projects of two PVO CSs, CARE/Peru and ADRA/OFASA, and two local PVOs, CARITAS and PRISMA, and results in the distribution of almost 30 0 k tonnes of Title II commodities over three years in CARE/Peru's food-for-work program in soil conservation activities, tree planting and maintenance, and rehabilitation of tertiary access roads and pathways Out of 1 740

communities, 1,142 (51,390 households) will have completed the four-year project cycle by the end of FY 2000

Recommended Environmental Action (Component 6 0) This program qualifies for a **categorical exclusion** under 22 CFR 216 2 (c)(1)(i) as the "action does not have an effect on the natural or physical environment."

3 2 (b) NIÑOS Project

NIÑOS is designed as a nutritional education project whose FY 2000 objective is to improve the nutritional status of 12,600 children under five in extremely poverty stricken communities in Piura, Puno, Ancash and Cajamarca Departments To this end, the project will a) conduct intensive training of 6,820 mothers regarding nutrition and maternal/infant health, b) develop and operate a nutritional and health surveillance system, c) install family and community latrines, d) create income-generation activities managed by women's organizations, and e) lend support to community infrastructure

(1) Training. This component involves two sub-activities a) bimonthly group educational meetings with mothers, with school-age children, and with health promoters, and b) periodic household visits for reinforcement and verification of acquired knowledge

Recommended Environmental Action (Training Component) This component qualifies for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(i) as the activities supported are generally excluded from further environmental review, specifically "[e]ducation, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc)

(2) Nutritional and Health Surveillance This activity covers periodic evaluation of the health and nutrition status of children under five and entails two sub-activities a) biweekly weight and height determinations to inform mothers of their children's nutritional status, and b) periodic home visits to detect/control prevalent childhood diseases

Recommended Environmental Action (Nutritional and Health Surveillance Component) This component qualifies for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(viii) as the actions supported under this activity comprise "[p]rograms 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, waste water treatment, etc)" thus representing types of activities generally excluded from further environmental review

(3) Income Generation. This component consists of granting women's organizations loans in the form of revolving funds (RFLs) Each participating group grants individual loans to group members Also, the project provides training relating to the management of the funds and technical skills

Recommended Environmental Action (Income Generation Component) This component qualifies for a **categorical exclusion** under 22 CFR 216 2 (c)(2)(x) since the actions supported are generally excluded from further environmental review under the category of "[m]atching, general support and institutional support grants provided to private voluntary organizations (PVOs) to assist in financing programs with USAID's objective in providing such financing does not require knowledge of or control over the details of the specific activities conducted by the PVO"

(4) Community Infrastructure Support. As part of an agreement with community authorities and also to facilitate the projects group activities (i.e., educational meetings, weighing sessions, preparation of balanced meals demonstrations, etc), CARE/Peru provides the communities with construction materials such as wood, cement, calamine, roofing tiles, etc , amounting to $ 500 or less for completion and/or improvement of community locales

Additionally, one of the health education subjects that project participants learn is the prevention/control of diarrheal diseases in children. In FY 98, it is anticipated that the sub-activity will support 1,800 families in the installation of latrines In order to select beneficiary families, project staff must take into account the incidence of diarrheal disease in their children. Also considered is the family's motivation level and the possibility for their participating in constructing the latrines within an established timeframe. Thus, the families are to be responsible for digging the pits and building the outhouse structure, while the project will provide reinforced concrete platforms, and occasionally, the outhouse roof and door Technical assistance will be provided by permanent staff professionals from the Environmental Sanitation Offices of the regional MOH, and engineers from CARE/Peru's Potable Water and Community Health project.

Recommended Environmental Threshold Decision (Support to Community Infrastructure Component) A **negative determination with conditions** under 22 CFR 216 3 (a)(2)(iii) is recommended *"with the stipulation that proper attention is paid to the norms specified in Section 2 0 Installation of Family Latrines in CARE/Peru's 1998 PAA submission pp 69-70*

Moreover, these norms should be reviewed in concert with USAID Bureau for Africa, 'Environmental Guidelines for Small-Scale Activities in Africa,' Technical Paper No 18, June 1996, pp 67-74 Care/Peru will ensure that its health and safety mitigations conducted to support this component, are integrated into a Monitoring and Evaluation plan, which will be prepared in accordance with precepts laid out in the attached document [see The World Bank UPDATE 'Health Effects of Environmental Assessment,' No 18, July 1997] "

4 RECOMMENDED MITIGATION MEASURES, MONITORING AND EVALUATION

[to be completed]

4 1 Agricultural Land Improvement
4 2 Agricultural Production/Post Harvest Elements
4.3 Agroforestry
4 4 Road Rehabilitation
4.5 Community Infrastucture

5 SUMMARY OF FINDINGS

[to be completed]

Annex

Table 1 Summary Matrix Synopsis of Environmental Decisions for Activities for CARE/Peru FY 1996 DAP & FY 1999 PAA

ALTURA-2 PROJECT

COMPONENTS	DISTRIBUTION/ LOCALE	SITES/ PROJECTS	SCALE & QUANTITY	UNIT	% OF T II	PROBABLE DETERMINATIONS
1 0 Community Promotion and Training	Ayabaca Huancabamba Huarochiri and Huancavelica Provinces	Extremely Poor Communities	51 390 Families in 1 142 Communities	Communities Promoters Trained, Families	19%	Categorical Exclusion per 216 2(c) (2) (i)
2 1 Seedling Production	11 Departments in High Andes of Peru	Poor Andean Communities	1 440 Nurseries of 30x35m 8 000 Seedlings per Year	Seedlings, Trees Sq Meters	9%	Negative Determination with Conditions (Flat Plots or Bench Terraces and No Chemical Pesticides)
2 2 Agroforestry Plantings	Selected Andean Provinces	Poor Andean Communities	4 049 Ha Of Trees to Be Planted in Fy 98	Hectares	3%	Negative Determination
2 3 Block Reforestation	Selected Andean Provinces	Areas with Steep Slopes Hilltops and Upper Areas of Micro-watersheds	2,578 Ha To Be Targeted for Intervention in FY 98	Hectares	2%	Negative Determination with Conditions (Only According to Moa Norms)
2 4 Forestry Plantings Maintenance	Common to All Area of Study and Interventions	Tree/shrub Pruning	1 214 Ha Will Be Receiving Desired Pruning/ Maintenance	Hectares	1%	Negative Determination
3 1 Cropland Improvement Through Soil Conservation	On Slopes Already Used by Farmers as Cropland	Bench/slow Formation Terraces	2,609 Ha. Of Existing Cropland 3x8 m on Slopes less than 45 Degrees 7x12 M On Slopes Greater than 15 Degrees	Sq Meters and Hectares	4%	Negative Determination with Conditions
3 2 Upgrading of Marginal Land For Cropping Purposes	On Marginal Land	Bench/slow Formation Terraces on Barren, Steep Slopes Covered with a Thin Soil Layer	Upgrade 1,440 Ha Of Marginal Land	Hectares	2%	Negative Determination with Conditions
3 3 Protection of Vulnerable Areas Against Erosion	On Marginal Land	Infiltration Ditches to Be Surrounded by Agroforestry Hedges to Increase Soil Capacity for Retaining Run-off and Subsurface Water	Protect 2 880 Ha Of Vulnerable Areas	Hectares	5%	Negative Determination

COMPONENTS	DISTRIBUTION/ LOCALE	SITES/ PROJECTS	SCALE & QUANTITY	UNIT	% OF T II	PROBABLE CLASSES OF ACTION
4 0 I ood Crop Production	See Previous Description	Small Holder Plots Previously Upgraded And Protected	I 974 Ha To Be Sown With Various Crops	Hectares	19%	Negative Determination With Conditions (Establish Acceptable Norms For Ta/training, M&e Plan Should Track And Measure Impact on Observable Farming Practices)
5 1 Rehabilitation of Community Access Roads And Pathways	See Previous Description	Access Roads Less Than 2km Long And 4 M Wide, Pathways Are 2-3 M Wide	FY 98 Targets 3,755 Km Of Community Access Roads And Pathways of Less Than 2 Km Each to Be Repaired	Km And Meters	7%	Negative Determination With Conditions (Strict Compliance With Local Norms, No New Roads/ Pathways to Be Constructed, Develop Norms For Construction of Drainage Ditches on Both Sides of Road Platform)
5 2 Information System on Market Situation/ Prices of Harvested Produce	—	Participant Farmers	Poor Farmers And Producer Families	Temporary Food Distribution Centers	4%	Categorical Exclusion Per 216 2(c)(2)(v)
6 0 Pl 480 Food Commodities Distribution	Selected Andean Provinces	Area Wide Impact	12,227 Tonnes in FY 98	Metric Tons	26%	Categorical Exclusion per 216 2 (C)(1)(i)

NIÑOS PROJECT

COMPONENTS	DISTRIBUTION/ LOCALE	SITES/ PROJECTS	SCALE & QUANTITY	UNIT	% OF T II	PROBABLE CLASSES OF ACTION
Training	Piura, Puno Ancash and Cajamarca Departments	Group Educational Meetings with Mothers	12,600 Malnourished Children Affected	Mothers	36%	Categorical Exclusion per 216 2(c) (2) (i)
Nutritional and Health Surveillance	See Previous	Home Visits and Exams	Weight/height Exams Twice Monthly for Children under Five	Children	30%	Categorical Exclusion per 216 2(c) (2) (Viii)
Income Generation	See Previous	Revolving Fund Loans to Women Organizations	360 Rlfs to Be Established @ $2 625 Fa	Rfl	22%	Categorical Exclusion per 216 2(c) (2) (X)
Community Infrastructure Support	See Previous	1 0 Community Locales, Family Latrine Construction	—	Number of Locales and Latrines	12%	Negative Determination with Conditions

Annex B 5

TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET – DRAFT

Title of DAP/PAA Activity. Uganda Food Security Initiative (UFSI) FY 1999 PAA

Program/Activity Number FFP-G-00-97-00040-00

CS name/Country/Region Africare/Uganda

Funding Begin October 1, 1996 **Funding End** September 30, 2001
Subactivity Amounts N/A

Resource Levels Commodities (dollar equivalent, incl monetization) $5,449,668
Total metric tonnage request _____

202(e) grant $_____

Statement Prepared by J Graham and G Bellas, Africare DRAFT Date October 7, 1997
title _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply)
*air*___ *water*__✔_ *land*_✔__ *biodiversity* (specify)_____ human health____ other____ none_____

Environmental Action(s) Recommended (check all that apply)

__✔___ 1 *Categorical Exclusion*(s)

__✔___ 2 Initial Environmental Examination

__✔_ *Negative Determination* no significant adverse effects expected regarding the proposed activities, which are well defined over life of DAP/PAA Prepare IEE-
__✔_ without conditions (no special mitigation measures needed, normal good practices and engineering will be used)
__✔__ with conditions (special mitigation measures specified to prevent unintended impact)

____ *Negative Determination* no significant adverse effects expected, but multiple sites and sub-activities are planned which are not yet fully defined or designed "Umbrella " IEE prepared **(go to Annex B and Annex F for example as to how to address this sort of IEE and subsequent process)**
____ condition agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring

____ *Positive Determination* IEE confirms potential for significant adverse effect of one or more activities Appropriate environmental review needed/conducted
____ EA to be / being / has been (circle one) conducted Note that the activities affected cannot go forward until the EA is approved.

____ *Deferral* one or more elements not yet defined, will not be implemented until amended IEE is approved

Summary of Findings

Based on the environmental review presented in this IEE, the following determinations are made

1 A **Categorical Exclusion** is recommended for monetization of commodity imports pursuant to 22 CFR 216 2(c)(1)(i) and to proposed agricultural production/postharvest handling/nutrition training programs pursuant to 22 CFR 216 2(c)(2)(i) as these activities will not have direct adverse effects on the environment

2 A **Negative Determination with Conditions** is recommended for proposed soil conservation/soil fertility interventions and rural road improvement activities which have a potential for environmental impact. The conditions presented in this IEE are intended to make certain that these planned activities will be implemented and monitored by Africare in conjunction with its collaborative local partners in a manner which ensures that they have no significant environmental impact consistent with recommended implementation guidelines detailed in the USAID Africa Bureau *Environmental Guidelines for Small-scale Activities in Africa* (June 1996)

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED

Clearance

Mission Director _____ Date _____
Donald Clark

Food For Peace Office Director _____ Date _____
Tom Oliver

Concurrence

Bureau Environmental Officer _____ Date _____
(BHR) Paul Desrosiers

Approved _____
Disapproved _____

Optional Clearances

FFP Officer _____ Date _____

Mission SO 1 Program Manager _____ Date _____
Ron Strykker

Mission Food Aid Manager _____ Date _____
DRAFT Greg Farino

Mission Environmental Officer _____ Date _____
Daniel Moore

Regional Environmental Officer _____ Date _____
Charlotte Bingham

Africa Bureau Environmental Officer _____ Date _____
Carl Gallegos

General Counsel _____ Date _____

File names

Mission
USAID/AFR/SD BEO 28ugatu ree
USAID/BHR BEO

Annex B 5

INITIAL ENVIRONMENTAL EXAMINATION[2] DRAFT

PROGRAM/PROJECT DATA

Program Number FFP-G-00-97-00040-00
Country/Region Uganda/Africa
Program/Activity Title Uganda Food Security Initiative (UFSI)

1 0 BACKGROUND AND PROJECT DESCRIPTION

1 1 Background

Africare has recently begun implementation of the Uganda Food Security Initiative (UFSI) in the southwestern district of Kabale in support of the national efforts being made by the Government of Uganda to increase food production Agriculture has been cited as the "engine of economic growth" The strong correlation drawn between agricultural growth and poverty reduction in Uganda is based on the large number of poor rural farmers who derive their incomes from agriculture[3] The Government of Uganda has articulated several key means of raising rural incomes Among these are increased agricultural production, improved trunk, feeder, and community roads, and better dissemination of information on agricultural markets, prices, and technology In addressing many of these issues the UFSI is at the same time addressing the USAID/Uganda Mission Strategic Objectives of helping to increase rural household incomes and the GHAI objective of food security in the Greater Horn of Africa region.

For decades Kabale District has been a key food producing region of Uganda However, as a result of high population density and intensive land use, the district is rapidly approaching a soil degradation crisis which, if left to continue, will render significant areas of land useless for cultivation While terracing and other soil conservation measures have long been used in the region, these have been increasingly neglected, in part due to the pressure to maximize planted areas In association with the declining agricultural productivity, Kabale District is faced with increased levels of nutrition deficiencies According to a 1993 World Bank study, with a rate of 54%, Kabale District has the country's highest level of stunting of children (lower than normal height-for-age)[4]

Production and post harvest interventions are also ranked as top priorities for Kabale District. The National Agricultural Research Organization of the Ministry of Agriculture (NARO) has developed improved yielding varieties of seed and planting stock suitable to the area for crops such as beans, potato, sorghum and maize Unfortunately, dissemination of these improved varieties is currently inadequate The post harvest handling unit of the Kawanda Agricultural Research Station has researched and identified a variety of post harvest handling and storage interventions that could can significantly reduce the loss rate of harvested and stored crops, but these also have not adequately reached farmers

The rural road system in Kabale District is not adequate in providing farmers with an efficient means for transporting agricultural products to market and is a constraint on expanded extension efforts While feeder road improvements are currently being carried out at the district level by the Ministry of Local Government, improvements to the network of smaller "community roads", which connect villages and farms to the feeder roads, are the responsibility of the Local Councils Often steep terrain or stream crossings present challenges which the rural population does not have the technical or financial resources to overcome Improvements to these farm-to-market access routes will have a direct impact on lowering production and transport costs thus raising income earnings among the rural farming families of the district.

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[2] Preliminary Draft for instructional purposes only Not to be reproduced

[3] Background to the Budget, 1995-1996 Economic Performance and Medium-term Strategy 1995/96 - 1997/98, Republic of Uganda, Ministry of Finance and Economic Planning, June 1995

[4] *Uganda Agriculture* - World Bank Country Study; The World Bank, 1993

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1.2 Project Description

The Uganda Food Security Initiative is a multi-year integrated rural development project which will operate in three counties in Kabale District. The overall goal of the project is to improve food security in Uganda thus strengthening the country's role in enhancing food security for the Greater Horn of Africa. The specific objectives of the UFSI are to increase the quantity of food available for home consumption and commercial sale in Uganda, improve farm family access to food for home consumption in Kabale District; and enhance household utilization of food in Kabale District Africare intends to accomplish these goals and objectives through four areas of intervention

- Monetization of Commodity Imports Africare proposes to import and monetize, through Agricultural Cooperative Development International (ACDI), up to 16,089 MT of hard winter wheat This activity will supply a desired high energy commodity to the country, complement locally available soft wheat, encourage the growth of the local flour milling industry, and generate local currency needed to implement UFSI activities

- Agriculture Production/Post-harvest Handling/Nutrition These interventions will involve providing information and inputs to farmers on improved farm practices such as the use of improved seed varieties and weeding, provide training in organic farming, promoting techniques for decreasing post-harvest losses such as appropriate drying and storing methods, and providing education to farm families related to improved dietary and sanitation practices as well as maternal and child nutrition Twenty-one villages in the sub-counties of Kaharo, Kitumba, and Bubare have been targeted for this assistance

- Soil Conservation/Soil Fertility These activities are intended to increase awareness of destructive farming practices and promote terrace construction/maintenance, agroforestry interventions, crop rotation, and zero grazing practices These activities will be implemented in the 21 targeted villages

- Community Road Improvements This intervention will involve providing technical and financial assistance to Local Councils, typically at the parish level (LC3), to improve existing village level farm-to- market roads The design objective is to make sufficient improvements so that these roads can provide year round vehicle access for farmers to efficiently transport agricultural products to market. The types of improvements which will be undertaken are all small-scale and will primarily utilize local materials and village-based manual labor Typically the individual community roads to be improved are under 10 km with a total of 120 km of road scheduled for improvement during the five-year implementation period of the project. The Local Council at the district level (LC5) has committed itself to maintaining the roads once they have been improved

UFSI staff will take an interdisciplinary, participatory rural appraisal (PRA) approach in working with district and community level organizations to establish long-term, sustainable solutions to the identified household food security problems For the village based-components of the project, the UFSI will focus on simple small-scale interventions that can be easily organized, carried out, sustained, and replicated USFI will make full use of local agencies as implementing partners In this regard, Africare has committed to expend at lease 35% of the local currency direct cost budget in the form of funds and materials supplied to local implementing partners Africare will make these funds available through a variety of mechanisms including sub-contracts, sub-grants, and the supply of inputs Implementing partners will include local NGOs, universities, and research organizations as well as district and local government entities

1.3 Purpose and Scope of IEE

This IEE is intended to present a first review of the reasonably foreseeable effects on the environment of the actions proposed under the UFSI 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

Adherence to the procedures in this IEE is not in lieu of any environmental assessment procedures required under Ugandan law, nor can adherence to Uganda's environmental procedures be substituted for compliance with the procedures in this IEE However, efforts will be made to ensure a maximum degree of compatibility of the two respective assessment information requirements

2 0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2 1 Country Overview

Despite impressive economic recovery from the disastrous mismanagement during the period 1971-86, Uganda's per capita income level of $225 (an increase from $170 in 1990) places it in the ranks of the world's poorest countries Nearly 90% of the population are rural dwellers, making their living from increasingly fragmented smallholder agriculture It is estimated that 85% of rural households have on average of two hectares or less for all food, cash-crop, and livestock needs, in many cases this total is split between a number of non-contiguous plots In 1995 the total population of Uganda was estimated at 18 4 million, with an annual growth rate of 2 5% Poverty and population growth represent major sources of pressure on the country's unusually rich natural resource base

Although not a large country by African standards (241,000 km^2), Uganda is among the continent's richest countries with respect to its natural environment. Nearly 20% of the national surface area is covered by bodies of water, most notably Lake Victoria. Seven of Africa's 18 biogeographic regions (the highest concentration on the continent) and some 90 vegetation communities are represented. Occupying a transition zone between East African savanna systems and the moist tropical forests of the Congo Basin, Uganda's highly diverse landscape includes rift valleys, highlands and mountain ranges, papyrus swamps, acacia savannas, and an extensive network of interconnected rivers and lakes Pronounced differences in elevation help define Uganda's agro-ecological zones the Albert Nile valley along the northwestern border with Sudan is just 600 m above sea level, while the Rwenzori mountain range, along the western border with the Democratic Republic of Congo, and Mt. Elgon on the southeastern border with Kenya, exceed 5,000 and 4,000 m respectively Annual rainfall varies from 500 mm in the arid northeast to over 2000 mm in mountainous areas and along the larger lakes

Forest and woodland cover has declined in modern times, from an estimated 4[illegible]% of land area in 1890 to around 21% at present Agricultural conversion has played a major role in this process, alth[illegible]gh urbanization, infrastructure development, harvesting of wood fuels, and logging are also factors Population pressure ha[illegible]creased sharply population density per unit of land is now more than four times higher than in 1950 Cropland increased by 18% between 1980 and 1990

2.2 Kabale District

Kabale District is located in southwestern Uganda with Ntungamo and Rukungiri Districts to the north, Kisoro District to the west, and the Republic of Rwanda to the south and east. Kabale District covers an area of 1,827 km^2 It is divided into four administrative counties including the Municipality of Kabale and is further divided into 22 sub-counties

Altitudes in Kabale District range from 1,200 m to over 2,300 m above sea level The topography is of steep hills with typical slopes of 25% to 35% Long northwest trending ridges form valleys which are generally 400 m to 500 m lower in elevation Valley bottoms are typically nearly level swamp lands which, in relatively recent times, have been partially drained and are now used for grazing and crops Located within Kabale District is Lake Bunyonyi which is approximately 20 km long and from 1 to 2 km wide It is reported to be the second deepest lake in Africa.

Temperatures in Kabale District range from a mean maximum of 23 °C to mean minimum of 10 °C The district receives an average annual rainfall of 1,000 - 1,480 mm and has two rainfall seasons The two agricultural seasons for short rotation crops are March - May, harvesting in June - August and September - December, harvesting in January - March The long rotation crops, such as sorghum and sweet potatoes, are grown from September - July, harvesting in August.

The soils of the district are mainly sandy loam volcanic andosols and nitosols Although the steep terrain subjects these soils to soil erosion, they are moderately fertile and can support vegetables, legumes, bananas, coffee, and other food crops and livestock Anti erosion bunds with natural grass and in a few cases planted elephant grass are common features forming a terrace landscape Mineral fertilizers are, for the most part, not used and even manuring generally only occurs on fields close to homesteads The major crops grown in Kabale District are sweet potatoes, sorghum, beans, Irish potatoes, field peas, maize, wheat, and vegetables Sorghum is the main cash crop Few families keep cattle, while small stock (goats, sheep, pigs, poultry) are kept by most families The animals are grazed on marginal hill land, valley bottoms, roadsides, and interseasonal fallows Trees are found around homesteads and in small woodlots They are mainly eucalyptus and black wattle

Kabale District is one of the most densely populated districts in Uganda with a total population of 483,846 (projected from 1991 census) and a population density of about 265 persons per km^2 Of the total population, 111,285 are women between the ages of 15 - 49 The people are Bakiga, a Bantu speaking ethnic group Their major occupation is subsistence farming The land tenure system is customarily private land ownership Over 95% of the population in Kabale District is rural and land is very scare with most of the farm families owning or controlling less than one hectare The household size averages between 6 and 10 people The homesteads are found mainly in the valleys with a few on the slopes The slopes and ridge tops are otherwise completely cultivated with terraced plots The family is the main source of labor Hired labor is sometimes used where people have small families or are aged and do not have relatives in the area. Labor is also used in exchange for renting land for the season by those who do not have enough land Women and children are mainly responsible for farming and taking care of the home The men are engaged in off-farm activities such as building and maintaining the home, fencing, and employment often outside the district.

2.3 Uganda Environmental Policies and Procedures

The Uganda Environment Statute of 1995 establishes general principles for environmental management in Uganda as well as requirements for environmental planning at both national and local (district) levels, a framework for environmental impact assessment (EIA), requirements for adoption of environmental standards, environmental management measures for sensitive resources, provisions for environmental restoration orders, and other requirements Currently, EIA guidelines and standards are in the final stages of development The development of both the Statute and the various implementing regulations concerning environmental review has benefitted considerably from technical assistance provided by USAID As a result, much of the regulations and processes in place at present closely resemble those of the United States

3 0 EVALUATION OF ENVIRONMENTAL IMPACT POTENTIAL OF PROJECT

3 1 Introduction

Many of the proposed UFSI activities are either training oriented or very small-scale and as such will have little or no direct biophysical effect on the environment. There are, however, some aspects of the proposed interventions which, unless carefully implemented and monitored, could hold some potential for adversely affecting the environment.

3.2 Monetization

Monetization of commodity imports, which is the funding mechanism for the UFSI, is being carried out by Agricultural Cooperative Development International (ACDI) This process of import and sale of wheat at market prices will involve sea and land transportation, storage, and some packaging activities all of which will utilize existing infrastructure Therefore there is limited present or future change to the environment anticipated from this intervention

3.3 Agricultural Production/Post Harvest Handling/Nutrition

The village-based activities planned under this group of interventions are primarily training oriented but will include the provision of some agricultural inputs such as improved seeds and hand tools UFSI will not supply or promote the use of agriculture chemicals

The input of improved seeds is intended to increase farmers' yields The traditional practice of obtaining seed from the annual harvest has, over time, lead to a degradation of seed quality UFSI, through a local implementing partner, will assist farmers in obtaining high-quality sanitized seeds to enhance the yields from their farms The source of these seeds will be institutions such as Kaleyengere and Kawanda Research Stations as well as commercial seed growers sanctioned by the Government of Uganda Given that the provision of this input will be limited to seeds for crops which are currently grown in the District, there is no foreseeable environmental impact as a result of this activity

Also included in this group of interventions will be the facilitation of the construction of simple home-based food storage systems While this is a physical activity, because of its scale it is unlikely to have any adverse affect on the environment. The introduction of pesticides will not be a part of UFSI activities

3 4 Soil Conservation/Soil Fertility

While project interventions related to soil conservation and soil fertility are primarily training activities on the part of the UFSI and local partners, when implemented by the participating farmers they have a potential for environmental impact It is the intent of the UFSI that these impacts be positive and improve a deteriorating environmental situation and that any unintentional or unavoidable adverse effect are kept to an absolute minimum The following activities have some potential for impacting the environment

- Soil conservation and soil fertility enhancement using agroforestry interventions This activity, to be implemented by a local partner, will be a comprehensive program aimed at promoting the establishment of fodder producing hedgerows, tree crops for fallowing, and wood lots on slopes which are inappropriate for tilling The highly defined fixed-duration program held in interested participating villages will include formal training, field trips to demonstration plots and successful farm applications, provision of seedlings and tools, work sessions, and follow up visits There are few adverse environmental impacts envisioned as an outcome of these activities either short or long term The program will, however, involve the propagation of exotic as well as native tree species and in some instances this type of activity, if not well designed or monitored, could result in uncontrolled spread of a particularly aggressive species or in the introduction of new pests into an area. Mitigation measures are detailed in the next section

- Soil conservation and soil fertility workshops These short duration workshops are intended to promote construction and maintenance of terraces and other erosion control techniques such as grass strips, minimal tilling, and zero grazing Soil fertility enhancement through crop rotation and organic farming techniques will be emphasized The introduction of chemical fertilizers will not be a UFSI activity The workshops will primarily be training activities which will likely also include tool distribution Little negative environmental impact is anticipated as a result of the activities promoted other than the possible adverse health effects of increased handling and concentration of animal waste near homesteads as a result of the promotion of zero grazing Mitigation measures are detailed in the next section.

3.5 Community Road Improvements

More than any other component of the USFI, the Community Road Improvement activities will result in direct physical effects on the environment. However, if these roads are properly designed, carefully constructed, and regularly maintained, there is likely to be a net improvement on the present conditions of uncontrolled soil erosion on the typical existing non-engineered, poorly maintained community road In addition to the needed financial and material inputs, UFSI will provide the Local

Councils technical assistance needed to design and supervise the proposed community road improvements

The road improvement activities to be implemented are all small in scale and will typically be undertaken with manual labor These construction activities and their potential environmental impacts will include

- Clearing of right of way Potential environmental impacts include loss of vegetation and possible soil erosion during and immediately after construction.
- Limited road widening typically involving cut and fill on hillsides Potential environmental impacts include increased soil erosion and minor failures of cuts until stabilized with vegetation.
- Drainage improvements such as road side ditches and cross drainage culverts Potential environmental impacts include concentration of flow causing gully formation and erosion at culvert outfalls
- Addition of fill to cross valley bottom land Potential environmental impacts include loss of wetland vegetation and altering of natural water courses
- Installation of culverts at stream crossings Potential environmental impacts include constriction of channel flow resulting in upstream flooding
- Improved road surface material (gravel) and grading in some locations Potential environmental impacts include possibility of water ponding in abandoned borrow pits and creating breeding grounds for mosquitos In addition, the use of a motor grader will create dust during operation

After improvements are completed there will be an inevitable increase in traffic on the community roads This will likely result in an increase in dust, noise, and possibly traffic accidents

Measures which will be adopted to mitigate the potential adverse environmental impacts associated with the community road improvement activities are detailed in the next section.

4 0 RECOMMENDED MITIGATION MEASURES, MONITORING, AND EVALUATION

4 1 Mitigation Measures for Soil Conservation/Soil Fertility Interventions

- To the extent that exotic tree, shrub, or grass varieties are introduced into the area, UFSI will ensure that these are well tested, non-nuisance varieties approved by the Government of Uganda, Ministry of Agriculture
- Inputs of seedlings to any group or individual will include a variety of plant species
- In conjunction with soil conservation and soil fertility workshops, the hazards and costs of chemical fertilizers will be emphasized
- In association with the promotion of zero grazing activities, training will emphasize the need for proper handling of animals and animal waste

4.2 Mitigation Measures for Community Road Improvements

- Road widths will be kept to the minimum required to achieve objective of all-year vehicle access The typical community road after improvement will be only one lane with occasional passing points
- Existing road alignments will be followed except in special cases where it is necessary to reduce an unacceptable

grade or minimize cut and fill

- Manual labor rather than earthmoving equipment will be utilized where ever feasible
- All cut and fill slopes will be revegetated with tree, bush, and grass planting Tree and hedge buffers will be planted between road and homes
- In roadside ditches on steep grades, masonry check structures and drop inlets will be installed to control gully formation Liberal use of cross drainage culverts and offshoots (discharge points) will be provided Vegetation will be promoted in roadside ditches Rock energy dissipaters will be installed at culvert outfalls as necessary to prevent erosion
- Where roads cross swamps, existing alignments will be used to avoid affecting additional wetland vegetation A sufficient number of culverts of adequate size will be installed to avoid altering alignment of natural watercourses or causing upstream ponding
- Borrow excavation will be limited to banks rather than pits and use a number of smaller sources Revegetation will be provided after completion of work
- UFSI will ensure that the Local Council at the district level (LC5) meets its commitment to maintaining the roads once they have been improved

4.3 Promotion of Environmental Review and Capacity Building

Africare intends to carry out most of the activities of the UFSI through a variety of contract and sub-grant arrangements with local implementing partners While these local partner will be given comprehensive responsibility for implementation of various project activities, the objective and detailed scope of work for a given activity will be clearly established Contracts, letters of understanding, and other types of formal agreements will be the norm Within this framework, relevant environmental mitigation and monitoring measures established in this IEE will be routinely incorporated into the agreements with local partners

In addition, UFSI staff will strive to sensitize local government and non-governmental agencies, which have less formal relationships to the project, to the environmental issues associated with project implementation All local partners involved with project activities which have a potential for environmental impact will be supplied with a copy of the USAID Africa Bureau *Environmental Guidelines for Small-scale Activities in Africa* (June 1996) Africare staff in Uganda have received formal training in the use of *Guidelines*

4 4 Monitoring and Evaluation

During the five year UFSI implementation period, Africare is required to monitor and evaluate the project's success against pre-determined indicator bench marks established by the baseline survey A monitoring and evaluation program is currently being established to achieve this function Africare will incorporate the monitoring of environmental indicators into this program Specifically, UFSI will carry out the following monitoring activities related to the soil conservation/soil fertility and community road improvement interventions

Soil Conservation/Soil Fertility

- UFSI will monitor the type and mix of trees and shrubs which are being supplied to farmers participating in agroforestry programs to ensure that they are well tested, non-nuisance varieties approved by the Government of Uganda, Ministry of Agriculture

- Where zero-grazing practices have been promoted, UFSI will monitor the sanitary conditions in and around animal enclosures, and if determined to be necessary, will initiate additional training in the proper handling of the animals and animal waste

Community Road Improvements

- During the design, layout, and construction phases of each road improvement project, UFSI will monitor activities to ensure that the recommended mitigation measures are being incorporated into the work

- The integrity of the completed road improvements will be checked after the first heavy rain and at three month intervals for one year Specific indicators that will be monitored include formation of gullies in roadside ditches, on road surfaces or on adjacent slopes affected by the work, soil erosion at culvert outfalls, stability of cut and fill slopes, and reestablishment of vegetation along right of way and borrow areas

- UFSI will take responsibility for coordinating any remedial action which is required within the first year of completion of the road improvements

- Upon completion of each road improvement project, UFSI will formally notify the Local Council at the district level (LC5) that it is officially responsible for implementing the road maintenance program as per their agreement. After three months this will be followed up to confirm that appropriate arrangements have been made

USAID/Uganda is ultimately responsible for assuring conformity with the procedures spelled out in this IEE, including environmental categorization and review procedures With particular respect to monitoring, evaluation, and mitigation, the Mission is responsible for

- Review of UFSI reports with respect to results of environmental mitigation and monitoring procedures

- Incorporation into Mission field visits and consultations with UFSI staff, field examination of the environmental impacts of activities and pertinent questions about mitigation and monitoring

- Reporting on implementation of mitigation and monitoring requirements as part of the summary of activities and their status that is passed to the REO and BEO

- Monitoring and evaluation of activities after implementation with respect to environmental effects that may need to be mitigated This is a process which should be integrated into the overall Mission Performance Monitoring Plan

5 0 SUMMARY OF FINDINGS

Environmental Determinations

Based on the environmental review presented in this IEE, the following determinations are made

1 A **Categorical Exclusion** is recommended for monetization of commodity imports pursuant to 22 CFR 216.2(c)(1)(i) and to proposed agricultural production/postharvest handling/nutrition training programs pursuant to 22 CFR 216 2(c)(2)(i) as these activities will not have a direct adverse effects on the environment

2 A **Negative Determination with Conditions** is recommended for proposed soil conservation/soil fertility interventions and rural road improvement activities which have a potential for environmental impact The conditions presented in this IEE are intended to make certain that these planned activities will be implemented and monitored by Africare, in conjunction with its collaborative local partners, in a manner which ensures that they have no significant environmental impact consistent with recommended implementation guidelines detailed in the USAID Africa Bureau *Environmental Guidelines for Small-scale*

Activities in Africa (June 1996)

Conditions

The potential environmental impacts of the planned soil conservation/soil fertility activities shall be mitigated by adopting the measures detailed in Section 4 1 of this IEE

Implementation of the community road improvement activities shall incorporate mitigation measures detailed in Section 4 2 of this IEE

Local implementing partners will be made fully aware of, and made responsible for, adhering to the environmental mitigation and monitoring requirements presented in this IEE

The UFSI monitoring and evaluation process shall incorporate the features detailed in this Section 4 4 of this IEE

New activities introduced into the project which are substantively different from those presented in this IEE will be first reviewed in accordance with the Environmental Screening /Review Form and procedures detailed in the USAID Africa Bureau *Environmental Guidelines for Small-scale Activities in Africa* (June 1996)

This IEE does not cover pesticides or other activities involving procurement, transport, use, storage, or disposal of toxic materials Any situation dealing with such will require an amended or separate IEE

Africare/Uganda
Uganda Food Security Initiative

Activity/ Environmental Impact Summary
24 September 1997 - DRAFT

PROJECT ACTIVITIES	POTENTIAL ENVIRONMENTAL IMPACTS	RECOMMENDED MITIGATION ACTION	DEGREE OF ENVIR IMPACT (Assuming Mitigation)
1 MONETIZATION			
A Sale of Wheat at Market Rates	no negative impacts anticipated		
2 AGRICULTURAL PRODUCTION / POST HARVEST HANDLING / NUTRITION			
A Improved Seeds, Tools & Training (no introduction of commercial fertilizers or pesticides)	no negative impacts anticipated		
B Organic Farming Workshops (promote increase in organic material, weeding,)	no negative impacts anticipated		
C Post Harvest Handling Workshops (improved drying and storage methods)	no negative impacts anticipated		
D Nutrition Workshops (improved dietary and sanitary practices, maternal and child nutrition)	no negative impacts anticipated		
3 SOIL CONSERVATION / SOIL FERTILITY			
A Agroforestry Interventions (promote hedgerows to stabilize terraces and retain soil, tree crops for fallowing, tree planting on slopes inappropriate for tilling)	problems with uncontrolled spread of exotic species pest problems with mono-cropping	uncontrolled spread not a problem in area because of intense demand for land and fuel, introduce only well tested, non-nuisance varieties approved by GOU introduce a variety of species	
B Soil Conservation Workshops (promote terrace construction and maintenance)	no negative impacts anticipated		

Africare/Uganda
Uganda Food Security Initiative

Activity/ Environmental Impact Summary
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PROJECT ACTIVITIES	POTENTIAL ENVIRONMENTAL IMPACTS	RECOMMENDED MITIGATION ACTION	DEGREE OF ENVIR IMPACT (Assuming Mitigation)
C Soil Fertility Workshops (promote crop rotation , organic farming techniques, and provide training in hazards and costs of commercial fertilizer use)	no negative impacts anticipated		
D Zero Grazing Workshops (promote manual harvest of fodder)	concentration of animal waste near homes	in conjunction with soil fertility interventions, promote safe collection and use of waste as organic fertilizer	
4 COMMUNITY ROAD IMPROVEMENTS			
A Planning & Design			
staking	minor loss of vegetation	limit clearing to only that required	minimal
B Construction			
clearing of right of way	loss of vegetation, increased soil erosion	keep design width to min req'd to achieve objective of all-weather vehicle access, re-vegetation	moderate short-term impacts, minimal to no long-term impact
cut & fill on hillsides (primarily by manual labor - to widen roads or minor realignment where required to reduce grade or minimize cuts)	increased soil erosion, minor failures of cuts	heavy reliance on manual labor vs earth moving equipment, keep design width to min req'd to achieve objective of all-weather vehicle access, extensive tree & bush planting along cut & fill slopes	moderate short-term impacts, minimal long-term impact or actual improved condition

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Uganda Food Security Initiative

Activity/ Environmental Impact Summary
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PROJECT ACTIVITIES	POTENTIAL ENVIRONMENTAL IMPACTS	RECOMMENDED MITIGATION ACTION	DEGREE OF ENVIR IMPACT (Assuming Mitigation)
drainage improvements (roadside ditches and cross drainage culverts)	concentration of flow causing gully formation, erosion at culvert outlets	drop structures or checks in roadside ditches on steep grades, drop inlets at cross drainage culverts, liberal use of cross drainage culverts and outboard offshoots (discharge points), promote vegetation in roadside ditches, rock energy dissipaters at culvert outlets	anticipate reduced impacts compared to typical existing condition of uncontrolled erosion on poorly constructed roads and tracks with steep gradients
culvert placement at stream crossings	constriction of channel flow,	install sufficient number and size of culverts to minimize upstream ponding	minimal
fill across swamps (in conjunction with culvert placement)	loss of vegetation, altering of water courses, loss of wetlands	use existing road alignment, locate culverts and install sufficient number and size to minimize altering of water courses or ponding, keep design road width to min req'd to achieve objective of all-weather vehicle access	minimal impact (swamp areas are now actively drained and typically used for grazing or crop production)
road surface (granular material in select areas and use of motor grader on some roads)	borrow pits could pond water, grader will create dust	limit borrow source excavation to banks rather than pits, use a number of smaller borrow sources	minimal
C Operations			
increased traffic	increase dust, noise and accidents	limit improvements to min req'd to achieve objective of all-weather vehicle access without encouraging high speed or use of community roads over feeder roads, extensive tree, & hedge planting along right of way and especially between road and homes	

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Activity/ Environmental Impact Summary
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PROJECT ACTIVITIES	POTENTIAL ENVIRONMENTAL IMPACTS	RECOMMENDED MITIGATION ACTION	DEGREE OF ENVIR IMPACT (Assuming Mitigation)
road maintenance (carried out by LC5 through local manual labor contracts - primarily filling holes and clearing ditches, culvert inlets, and offshoots)	no negative impacts anticipated		

Annex C

Programmatic Environmental Assessments: Special Application

PROGRAMMATIC ENVIRONMENTAL ASSESSMENTS. SPECIAL APPLICATION

C 1 What Are Programmatic Assessments?

C 1 1 Programmatic Approaches

Occasionally it is necessary and/or helpful to carry out an environmental assessment a sector (agriculture, road construction, etc) or a larger program that will eventually contain several projects or sub-grants Such an overall assessment is known as a Programmatic Environmental Assessment (PEA) and can serve as a general assessment of a sector or provide the basis for future environmental reviews, at either project or sub-project level

The basis for PEAs lies in Section 216 6(d) of Reg 216

> *(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 or 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 Missions, 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 Assessments on major individuals 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 action shall be made available for public comment before the categorical exclusions or design standards 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*

The concept of sectoral or programmatic assessment is not new to the donor community, although USAID was the first to apply it to international development assistance For example, the World Bank has published an outline of the essential elements of such assessments (*World Bank EA Sourcebook* Update No 4, October 1993), which contains much basic information on the process The description of a PEA in subsequent sections of this Annex draws heavily on the World Bank concept of sectoral assessment.

The *World Bank EA Sourcebook* Update No 15, June 1996, provides guidance on Regional Environmental Assessment. Regional EA in the Bank's terminology, differs from other forms of EA because of its distinct emphasis on the spatial setting, but is closely allied to Sectoral EA. The term Strategic Environmental Assessment (SEA) has gained favor as a concept to refer generically to sectoral, programmatic, policy, or regional EA. While there is considerable debate about the use of various terms, all these terms, in general, refer to forms of EA that are broader than a project-specific EA. *The International Study of Effectiveness of Environmental Assessment, Strategic Environmental Assessment*, Ministry of Housing, Spatial Planning and the Environment, Publication #53 (Sadler and Verheem, 1996)

provides a comprehensive review of SEA.

C 1 2 Advantages of a Programmatic Approach

The following advantages of PEAs are worth highlighting

- Sectoral EAs can prevent serious environmental impacts through analysis of sector policies and investment strategies, before major decisions are made
- They can assist in forming a long-term view of the sector and can increase the transparency of the sectoral planning process (i e , show the reasoning behind development plans), thereby decreasing the opportunities for purely political decisions that might be environmentally harmful
- They are suitable for analysis of institutional, legal, and regulatory aspects related to the sector, and for making comprehensive and realistic recommendations regarding, for example, environmental standards, guidelines, law enforcement, and training, thus reducing the need for similar analysis in later EA work.
- They provide opportunities to consider alternative policies, plans, strategies or project types, taking into account their costs and benefits, particularly the environmental and social costs that are often ignored in least-cost project planning
- PEAs help to alter or eliminate environmentally unsound investment alternatives at an early stage, thus reducing overall negative environmental impacts, while also eliminating the need for project-specific EAs for all these alternatives
- They are well-suited to consider cumulative impacts of multiple ongoing and planned investments within a sector, as well as impacts from existing policies and policy changes
- They are valuable for collecting and organizing environmental data into usable information and, in the process, identifying data gaps and needs at an early stage, and for outlining methods, schedules, and responsibilities for data collection and management during program or project implementation
- They allow for comprehensive planning of general sector-wide mitigation, management, and monitoring measures, and for identifying broad institutional, resource, and technological needs at an early stage
- They provide a basis for collaboration and coordination across sectors, and help to avoid duplication of efforts and policy contradictions between sector agencies and ministries
- They may strengthen preparation and implementation of sub-projects by recommending criteria for environmental analysis and review, and standards and guidelines for project implementation

C 2 When Is a PEA Approach Appropriate?

C.2 1 When Are PEAs Recommended instead of EAs?

An Environmental Assessment (EA) or Programmatic Environmental Assessment (PEA), in USAID's procedures, is a document that is typically drawn up for actions that normally have a significant (adverse) effect on the environment (If actions have a significant effect on the United States, the global environment, or areas outside the jurisdiction of a nation, an Environmental Impact Statement is prepared)

PEAs assess the environmental effects of multiple actions and their environmental impact in a given country or geographic area in order to determine the additive, synergistic, cumulative effects of discrete activities in a development

context (for example, multi-donor efforts in a particular region of a country) They may also be applied when the environmental impacts are generic or common to a class of actions, or to other activities which are not country-specific

The PEA can serve as a reference document from which Supplemental or individual Environmental Assessments, which can be done more efficiently or with a better foundation because of the PEA, are spawned, typically called tiering For example, the *USAID PEA for Locust and Grasshopper Control in Africa and Asia* is a classic application, from which 20 subsequent country Supplemental EAs have been tiered

If a positive determination under USAID regulations is made with the resulting legal requirement for an EA, there is no reason to require a PEA, especially if it is likely to call for Supplemental EAs, unless such an approach makes sense It may be more efficient to do a first EA and use it as a model for others, thus having saved at least one EA process in this way Even better is to do one PEA and have it result in a process of environmental documentation that is simpler than the EA. When PVOs have similar activities they might want to do a PEA together with the Mission and cover broadly their common issue activity types However, no PEA should be done without close Mission interaction and agreement about its purposes

For example, in Ethiopia, using the PEA approach may be useful USAID has recommended that a PEA be considered for investments in dams, ponds, irrigation, and other water supply interventions, to cover the activities of all the appropriate PVOs in Ethiopia. Other PEAs may be justified, such as of road rehabilitation and related construction Based on the processes, types of impacts and recommendations made in the PEA with respect to mitigative measures and monitoring, the specific conditions appropriate to a particular setting and activity would be identified in subsequent, activity or geographic-specific IEEs The PVOs would commit themselves to the set of conditions laid out in the IEE

C.2.2 Criteria for Choosing PEA

Three situations, may trigger PEA work

The first type of situation is development of a portfolio in one particular sector (e g , agriculture) or where there is a series of independent projects in a given sector Types of projects in this first context may include

- a national or sub-national sector program,
- a series of projects in the same sector,
- a large project with sectoral implications,
- a sectoral intermediate credit operation, or
- a sectoral investment operation

The second situation would be a case where a PEA is prepared to complement the planning process These PEAs may be triggered by USAID when a broad set of issues lies beyond the immediate purview of a project

In the third situation, a series of issues or interventions are expected to proceed in parallel with a particular project This PEA approach may be appropriate, for example, in sectors with a reputation for widespread and well-known environmental damage, e g , the livestock sector or water supply efforts, where previous water drilling has led to desertification. Although the particular project supported by USAID may not create any significant additional problems, you may want the kind of information provided by a PEA to justify program design options

The following questions will help identify when a sectoral approach may be particularly appropriate and useful in a project or program where Reg 216 applies If the answer to the following question is positive, PEA should be seriously considered

- Is the sponsor considering any activity in a sector with significant environmental issues?
- If the answer to the next three questions is also positive, a PEA is highly recommended
- Are there major existing environmental problems associated with the sector, and/or sector-wide potential environmental impacts resulting from the proposed program or series of projects?
- Is there a clear potential for significant environmental improvement or avoidance of major problems in the sector?
- Are there clear policy, regulatory, and/or institutional weaknesses having to do with environmental management in the sector?

In addition, some conditions increase the potential value of PEAs but are not sufficient or completely necessary requirements

- Is the program or project still at an early planning stage or at a new major investment phase, where important strategic decisions have not yet been made?
- Are conditions in the sector relatively stable and predictable (rather than changing rapidly and unpredictably) allowing for a medium to long-term planning horizon and allowing a better chance of gaining long-term value from the PEA?
- Are the implementors likely to give weight to the findings and recommendations?

C.3 PEAs in Operation

C.3 1 What Should Be in a PEA?

These sections are illustrative, not required. (See also Annex D-2 for Reg 216 recommended outline)

Section 1 Project Description

The nature and objectives of the program, plan, series of projects or other context to which the PEA is attached should be described, and the main environmental issues associated with the sector and these programs identified

Section 2 Baseline Data/Affected Environment

This section should describe and evaluate the sector's current environmental situation Where a project-specific EA would describe conditions such as ambient air and water quality or existing impacts from pollution around a proposed project site, the PEA should concentrate on the issues and problems that are typical of the sector as a whole For example, occupational health may be a concern across enterprises within a specific industry, seepage of heavy metals into streams and groundwater may be a recurring problem in the mining sector; or deforestation may result from activities in the agriculture sector Another important function of the PEA is to note major data gaps

Section 3 Environmental Impacts (or Consequences)

The single most difficult challenge in PEAs is to produce a precise impact analysis in the face of uncertainties related to final investment decisions and their individual and combined impacts In recent years, advances have been made in the technologies for assessing cumulative impacts in relation to development plans and programs Means include quantitative modeling, forecasting, and various qualitative analyses If any proposed sub-project is expected to cause particularly significant impacts, the PEA should recommend an appropriate course of action to address them, including carrying out project-specific EAs

All cumulative effects should be considered positive and negative, direct and indirect, long-term and short-term Aggregate problems such as sewage discharge, acid rain, ozone depletion, and deforestation usually result from several activities, sometimes stemming predominantly from a single sector Cumulative impacts on environmentally important and sensitive areas and assets, such as coastal zones and wetlands or inland water resources, are also important when the sector activities heavily affect these areas and/or resources

The PEA is an appropriate instrument for considering issues related to long-term sustainable development Specifically, the PEA may discuss how a proposed investment program may influence long-term productivity of environmental resources affected by the program

Section 4 Analysis of Alternatives (This section is often considered earlier as Section 2)

A PEA's major purpose is to analyze alternative design options and strategies in terms of environmental costs and benefits For example, if a proposed agricultural program emphasizes conversion of wetlands to rice production, alterative approaches would be intensification of production in existing fields, conversion of other land types, crop rotation, etc

All major activities under consideration, in addition to the option being considered, should be considered at this stage, whether complementary or alternative to the USAID option chosen The other options may include investments by the private and the public sectors A comparative analysis of alterative programs is recommended, applying indicators of environmental and social impacts and methods to evaluate and compare the indicators and, ultimately, the alterative options If several donors are involved in the sector, the PEA should review their existing and/or planned activities and suggest ways to coordinate efforts

The PEA can also be used to evaluate the environmental effects of sector policy [illegible] For example, changes in tax and subsidy rates on the use of natural resources may influence rates and [illegible] of [illegible]traction

If appropriate, the analysis should conclude with a list of sector proposals, ranked according to environmental preference The analysis of impacts and alternatives should result in an optimal investment strategy, in terms of environmental and social costs and benefits

Section 5- Mitigation Plan (This section is sometimes combined with Section 7)

Mitigation measures are usually detailed and technical, and therefore are normally addressed in project-specific EAs However, if planned or existing production and process technologies in a sector are relatively uniform, the PEA could recommend broad options for eliminating, reducing to acceptable levels, or mitigating environmental impacts This is particularly important in the case of PVO/NGO-type programs where interventions tend to follow a similar pattern of design. PEA mitigation and monitoring recommendations should draw on findings from the analysis of policy, legal, and institutional issues as well as the analysis of impacts and alternatives USAID provision of guidelines for use in several sectors is important here Such guidelines provide environmentally sound development principles that could reduce the amount of mitigation needed later

A PEA is an effective tool for designing and recommending mitigation measures and monitoring that can be implemented only at the national or sectoral level for regulatory or economic reasons Similarly, in a sector program involving multiple investments, the PEA may be better placed than project-specific EAs to consider sector-wide mitigation solutions that require economies of scale to be cost-effective Construction of a solid waste recycling plant for an entire country is one example

Note When specific screening and review procedures are processed, or specifications for a set of activities are defined, these form the basis of a separate chapter For certain types of infrastructure activities, such as roads or dams, it is important to *include recommendations for the requirements to be put into bids and tenders* for construction contractors

Section 6 Environmental Management and Training

One of a PEA's main outputs should be an institutional plan for improving environmental management in the sector based on findings of the previous sections The plan might recommend training existing staff, hiring additional staff, reorganizing units or agencies, or redefining roles and responsibilities This section might also include recommendations on policy and regulatory instruments for environmental management and enforcement in the sector A screening process to separate sub-projects needing a project-specific EA from those not requiring further analysis should be designed, if it is not already in place

Section 7 Environmental Monitoring Plan

The PEA should provide general guidelines for long-term, sector-wide environmental monitoring to ensure adequate implementation of investments A monitoring plan should use the findings of the baseline data section to measure progress in mid-term review and final evaluation The plan should also recommend measures needed to collect and organize missing data.

Section 8 Public Consultation

Public consultation is an integral part of the EA process, whether a project-specific EAor PEA is being prepared However, since a PEA normally covers an entire sector (in a national or subnational context) and is conducted before concrete investment decisions are made, it is not always possible to consult representatives of all potentially affected people during its preparation It is often more feasible and appropriate to carry out consultations with national NGOs (for example, for nature protection), scientific experts, relevant government agencies, and perhaps industrial and commercial interests as well A successfully implemented consultation process will help ensure public support for the final sector program.

See the Sample Table of Contents for a Rural Road Rehabilitation PEA, at end of Annex C

C.3 2 Observations on PEA in Practice

A classic PEA is beneficial when a broad examination of a class of impacts is needed, typically in situations where previous environmental assessments have not been performed, and there is little past experience to use as a guide The PEA serves as the document of reference, from this programmatic perspective, for subsequent Supplemental or individual Environmental Assessments, which can be done more efficiently or with a better foundation because of the PEA

The PEA can also be useful when considering a very unusual or special ecosystem in which a variety of activities might occur and for which special considerations need to be studied, for example, a coastal zone, major wetlands ecosystem or buffer zone surrounding a protected area.

Sometimes the PEA is applied in examining the impacts of activities in a regional or geographic setting to determine

the additive, synergistic, or cumulative effects of discrete activities in a development context (for example, water resource development in a state, province, or district or multi-donor efforts in a particular region of a country) This type of PEA is often referred to as a **Strategic Environmental Assessment** (see C 1 1 above) To be useful, it must consider impacts at the planning or policy level of a variety of planned and unplanned interventions undertaken by the private sector, governments, donors, etc Thus, it typically needs to be performed or sponsored by a government that has jurisdiction over the area (or it could be an entire sector, such as power) in question

One might call a rolled-together series of EAs in one document a PEA Such a document could cover a set of similar activities, if sufficient information were known about the specific situation of each, and some processing efficiencies could be achieved. For example, if four dams with similar structural characteristics exist in the same region with similar ecosystems, one might roll the four together in one document. However, if specific characteristics were not known, then the PEA **optimally** would provide a set of generic information about dam impacts and a **procedure or process to be followed.**

The observation has been made that EAs or PEAs are better than IEEs, because they involve the host country in participation However, there is no reason that stakeholder participation cannot occur through other levels of environmental documentation, such as an IEE Thus, the need for public participation need not be a criterion that triggers a PEA (or an EA)

When the PEA is applied to groups of project activities in the same sector, these lessons learned merit consideration

- PEAs are helpful when they address issues for which there is little generic information available and/or when there is substantial commonality among impacts from a project activity
- PEAs are not *usually* useful for routine activities for which manuals of impacts and mitigative measures already exist. (*Nevertheless, there are exceptions*)
- An EA may be needed legally for a routine activity for which manuals and the like exist, but there is no reason to require a PEA, especially if it is likely to call for Supplemental EAs An EA of the specific intervention(s) would be as useful as, and less costly than, an ambiguous PEA that did not provide sufficient guidance on design and mitigative measures to allow future EAs to be avoided. Thus, an EA that serves as a model, or a PEA that results in simpler environmental documentation than individual EAs, is more efficient
- Activities that are presumed to require an EA in USAID's Reg 216, which lack reference to scale or magnitude, will need documentation, justification, or a rationale to show why an EA (or PEA) was not necessary

C.3.3 Practical Considerations and Potential Obstacles

- Where USAID activities are concerned, no PEA should be considered without close Mission interaction and agreement about the purposes it will and will not serve
- Multi-purpose/multi-sector PEAs are difficult to accomplish and should be approached carefully They generally require a large budget Effective PEAs for PVOs are likely to be linked to a particular sector within a delimited geographic region that has shared characteristics and other commonalities
- PEAs should not be linked to a particular implementor, just because an element is common to all sectors This approach does not translate into useful PEA practice For example, you would probably not choose to do a PEA

for PVO A's multiple activities One could do a PEA more efficiently for activities of several PVOs operating within the same sector, e g , dam and irrigation interventions of PVOs A, B and C If the implementor is responsible for a broad set of related interventions in a sector, a PEA might be warranted for that implementor, or the PVO could have many types of interventions such that several PEAs are warranted

- *A good-quality PEA (or EA) process, from a Scope of Work through scoping data collection, analysis preparation, internal review, and external review typically takes up to one year* With aggressive workers and committed reviewers, six calendar months is feasible Experience has shown that approximately six to eight person-months of effort is usually needed, with a minimum of three person-months, not counting effort for Mission Environmental Officers or Project/Results Package Managers If document translation is required to achieve host-country participation, an additional level of effort is needed

- PEAs should not be viewed as a convenience, but rather as a serious, analytical process that takes time to do properly To the extent that PEAs are not necessary and are not squarely on target with respect to achieving larger purposes that can be easily and generically applied, *other forms of environmental documentation to accomplish environmentally sound and sustainable activities are to be preferred*, because they are less time-consuming, more targeted, and more useful

- PEAs should be applied judiciously to situations in which they can be genuinely useful as a planning tool

Annex C 1

Attachment to Annex C

SAMPLE TABLE OF CONTENTS FOR A PEA

USAID/MADAGASCAR PROGRAMMATIC ENVIRONMENTAL ASSESSMENT OF RURAL ROAD REHABILITATION ACTIVITIES[5]

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5 Source Bingham, C , E Loken, M Enders, S Gupta, R Hanchett and T Herlehey 1995 USAID

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Annex D

Official USAID Guidance

Annex D.1 **FY 99 DAP/PAA Environmental Compliance Language (Draft)**

Annex D 2 **USAID Environmental Procedures: Text of Title 22, Code of Federal Regulations, Part 216: (Reg 16)**

Annex D.1

FY 99 DAP/PAA Environmental Compliance Language

Appendix Q[1] Environmental Review and Compliance Information

I Background on Regulation 216

USAID's Environmental Procedures (known as 22 CFR 216 or Reg 216) are meant to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design stage, and that these consequences are considered prior to funding approvals and a decision to proceed with activity implementation, and (2) if possible, activities are identified that preserve or restore the natural resource base where the activity is located

II Title II Compliance with Regulation 216

Compliance with USAID's Environmental Procedures is required of all Title II Development Activities, whether they are supported by food assistance or Section 202(e) grants **By the end of FY 1998, all Title II activities must have an Initial Environmental Examination (IEE) or Categorical Exclusion (CE) request submitted and approved** by USAID Note that although compliance with the Regulation is required, **CSs are encouraged to look beyond compliance and, where relevant, to incorporate sound environmental planning into activity designs** to ensure that Title II-supported activities not only "do no harm," but actually improve the natural resource base This approach contributes to more sustainable natural resource management and agricultural activities, and, thus, to enhanced food security

A. USAID Approval of an IEE or CE

To meet this requirement, all DAP and PAA submissions for FY 1999 should include an IEE or CE request, which must be cleared by the Mission Director or his/her designee, then sent to FFP for clearance, and from FFP to the BHR bureau environmental officer (BEO) for approval Note, however, that if CSs and Missions are interested in getting feedback from the BHR and geographic BEOs on a draft IEE prior to formal submission, they are encouraged to submit a copy for informal review to one or both BEOs

IEEs for Title II Activities Already Approved

Note that for a DAP approved in FY 1997 (for example), the FY 1999 PAA should include an IEE that covers all activities approved in the 1997 proposal In other words, the IEE should represent the entire life-of-project activities, even if some were begun long before IEE submission At the same time, for those Title II projects in their final year of implementation, and particularly for

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[1] This is a reproduction of Appendix Q, from the official FY 1999 "BHR/FFP Development Programs P L 480 Title II Guidelines for FY 1999 Program Proposals" A few, though not substantively significant, differences may appear between this version and the one published in the Federal Register, due to clarifications resulting from the review of the Environmental Documentation Manual after the full 1999 DAP/PAA Guidance was published in the Federal Register Note that the title of the present volume "Environmental Documentation Manual" (EDM) replaces the original title "Environmental Information Package" (EIP)

those that do not plan to submit a follow-on DAP, it may not make sense to develop an IEE near the project's completion In such cases, the PVO should consult with the Mission, BEO and FFP for guidance on whether an IEE will be required

C Draft and Late Document Submissions

On a case-by-case basis FFP will accept **draft** IEEs or CE requests through the end of FY 1998 due to the fact that some field staff (particularly those in Latin America and the Caribbean) will receive environmental compliance training later than others In cases where an IEE is not included with a DAP submission, there may be a deferral on approval of DAP activities expected to have environmental implications It is also possible for the PVO to submit a draft IEE with the DAP document, indicating that the environmental review is underway and a final will be submitted later **Nonetheless, all IEEs should be submitted no later than September 30, 1998 For FY 2000, all DAPs will be expected to include an approved IEE in their submission**

D Annual Update on Status of Environmental Compliance for Activities with Approved IEEs

PAA submissions need not include an IEE if an IEE has already been approved by USAID for the subject Title II activity and no significant design changes have been made to that activity since the IEE approval If the IEE is deemed still appropriate by the PVO, the PAA submission should state, under a section entitled "Status of Environmental Compliance" that no changes have occurred since the IEE approval that warrant an amendment to the document Correspondingly, in the Mission's PAA approval cable to FFP, the Mission should certify whether it agrees that the approved IEE for the Title II activity is still valid.

III Training and Guidance in Environmental Compliance

All PVO project staff were invited to environmental compliance training, which was supported by BHR/FFP and hosted by PVO representatives of the Food Aid Management (FAM) Group for PVO headquarters in Washington, during October 1997 Field workshops in Ghana and Cape Verde are planned for December 1997, and March 1998, respectively Discussions are also underway to hold a workshop during 1998 in Latin America. No workshops are currently planned for Asia due to the fact that there are limited Title II activities in Asia that will be affected by Reg 216 Consequently, Title II CSs in India and Bangladesh will be invited to, and are encouraged to attend, one of the training sessions in Africa.

Also note that BHR (through the assistance of the Africa Bureau) is developing an Environmental Documnetation Manual (EDM) that provides guidance on completing CEs, IEEs and other types of more in-depth environmental reviews, and defines many of the environmental compliance issues and terms used in these instructions The EDM was tested at the PVO headquarters workshop It is being reviewed by the FAM-sponsored Environmental Working Group and should be available for distribution in February 1998 It will be added as an item in the **Information Packet** for the Title II Development Programs

IV Submission of IEEs and Requests for Categorical Exclusions

All Title II activities must submit an IEE or CE request describing what environmental effects, if any, are expected to result from the activities proposed. If a CE is requested, the request should state why this is justified (note that Reg 216 2(c) contains a list of allowable CEs) If the CE request is approved by USAID, no further environmental reviews will be required. Of course, all activities, whether categorically

excluded or not, should be designed and implemented following environmentally and developmentally sound practices, and be monitored accordingly

A CE or IEE

By definition, CEs will be granted, upon submission of the request and justification, to most general feeding, education, technical assistance and training activities Maternal and child health (MCH) activities may also be eligible for this exclusion, unless they involve immunization components in which the safe management and disposal of blood, needles and syringes is required[2] If an MCH activity does include immunizations the IEE must describe how biomedical waste disposal will be handled safely Note that technical assistance (TA) and training programs are typically granted a categorical exclusion However, in cases where the PVO is proposing TA or training related to activities that can affect the environment (e g , agricultural production, natural resource management, infrastructure development, water and sanitation facilities, etc), the PVO is encouraged to address in its project design/activity description how its TA and training will support environmentally sound and sustainable development results that can have a positive effect on the environment and food security Title II activities that monetize all or part of their food are also required to submit IEEs or CE requests that assess the environmental impact, if any, of those activities funded with monetized proceeds

B Who Prepares the IEE or CE?

In most cases the CS will prepare the IEE or CE request and submit it to the USAID Mission (prior to formal DAP submission if possible) for the Mission's review and clearance There may, however, be some cases where the Mission prefers to prepare the document itself, based on input from the PVO Thus, it is important for the PVO to discuss this matter with the Mission prior to initiating preparation of environmental documentation Whichever approach is taken, the Mission Director or his/her designee must clear the IEE or CE request prior to final IEE/CE and DAP approval by USAID/Washington Once the Mission has cleared the IEE/CE a signed copy should be sent to Washington (preferably as part of the DAP/PAA submission), where it must be cleared by the Director of FFP as a request for BHR bureau environmental officer (BEO) concurrence The concurrence by the USAID BEO constitutes the last step in the approval process Regional bureau clearances are not required, though CSs may send regional BEOs informational copies of environmental documentation, and to seek the guidance and expertise of these individuals during the process of IEE preparation and project design The BHR bureau environmental officer will also provide informational copies of IEEs to the relevant regional BEOs and seek their input, as appropriate

C Modifications to Activity Design Based on IEE Review

Following review of the IEE by the Mission and USAID/Washington, the CS may be requested to make modifications to current activity designs or budgets, and possibly to carry out an Environmental Assessment (a more comprehensive analysis than an IEE) in cases where the IEE recommends a Positive Determination, or where significant environmental consequences have been identified during the IEE and activity approval process

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[2] See World Health Organization 1997 (draft) Health Care Waste Management A WHO Handbook for the Safe Handling, Treatment and Disposal of Wastes 192 p

V IEE Preparation and Format

When completing the IEE or CE request, CSs should refer to the Environmental Documentation Manual, and the CE request forms (specifically, the IEE face sheet and activity description in EDM Annex A & B) Nonetheless, it is acceptable to use an alternative form consistent with individual geographic bureaus' or Missions' practices or requirements, provided they address the key topics and questions identified below

For Title II activities requesting a CE and where there is little question of the appropriateness of a CE determination due to the lack of any biophysical activities, e g , education programs, the PVO is not required to go beyond the background and project description section (section A below) of the IEE format

A Background and Project Description

This will assess why the activity is desired and appropriate, and outline the key activities proposed for Title II funding For activities requesting a CE, e g , education, direct feeding, etc , no analysis will be required beyond the background and project description After completing this section of the form, CSs should complete the IEE/CE cover page indicating a CE is requested, and why Additionally, the document should cite the sections of Reg 216 that support a CE, notably in 216 2(c)

If a PVO is requesting a CE for all activities in a DAP or PAA, it is not necessary to go beyond the background and project description section of the IEE format However, a full IEE must be completed if there are some activities within a DAP or PAA for which a CE is not appropriate

B Country and Environmental Information

For activities that must complete an IEE, this section is critical and should **briefly** assess the current, physical environment that might be affected by the activity Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e g , wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities

The information obtained through this process should serve as an environmental baseline from which future environmental monitoring and evaluation will occur Furthermore, for activities where there are expected environmental consequences, appropriate environmental monitoring and impact indicators should be incorporated in the activity's monitoring and evaluation plan Be selective in the country and environmental information to be provided, as it should be specific to

the activity being proposed, and more information is not necessarily better See Section 3 of the Environmental Documentation Manual for further information on the baseline

C Evaluation of Potential Environmental Impacts of Activity/Project

This section of the IEE is intended to define all potential environmental impacts of the activity or project, whether they be considered direct, indirect, beneficial or undesired, or short-term, long-term, or cumulative

D Recommended Mitigation Actions (including monitoring and evaluation)

This section should identify what the PVO proposes to do to avoid, minimize or eliminate negative impacts For each activity or major component proposed, the PVO should identify whether it recommends if a specific intervention included in the activity should receive a CE, negative determination (with or without conditions), positive determination, etc , as well as cite which sections of Reg 216 support the requested determinations (Refer to the Environmental Documentation Manual for explanation of these terms)

E Summary of findings

This should summarize the proposed environmental determinations and recommendations

F **Key IEE questions**

It is critical that all IEEs address the following questions (in the IEE Sections C & D above)

1) What are the effects of the activity, if any, on the environment?

2) How will you mitigate these effects?

3) How will you monitor effectiveness of the mitigative measures and unforeseen environmental changes or effects that might not lend themselves to mitigation?

4) Who will conduct the monitoring?

5) Who will do the reporting and to whom?

VI Special Cases.

A. Multi-Site, well-defined activities (Use Classic IEE format)

Many TII-supported programs carry out specific, well-defined activities in numerous sites across a region or country This frequently is the case in road construction, where a PVO may not have identified every road that will be approved at the beginning of a five-year DAP It is not realistic or necessary in such multi-site interventions for a PVO to submit and for USAID to approve an IEE for each site-specific activity Rather, the PVO in the example cited should consider submitting a single IEE that encompasses all its road construction activities, and mitigating measures that the PVO agrees to carry out to ensure that the roads will have no significant adverse environmental effects In other words, the PVO uses the Classic IEE format (see EDM) to propose a mitigation plan for its multi-site program. The mitigation plan might include local staff training and technical guidelines to ensure that each road has no negative, environmental implications (e g., water sources will not be diverted, soil will not be eroded, and protected species will not be endangered, etc)

The same IEE should be used to identify all other multi-site, well-defined interventions (e g. latrine construction, irrigation activities), as well as the mitigating measures that will be carried out at each site Additionally, PVOs may want to submit with their IEEs the master list of their activities and proposed determinations (see Sample Tables 2 2 and/or 2 3 in the EDM), which will be helpful to USAID in its environmental review of the document.

B Multiple activities that are not yet fully defined (Consider using an "umbrella" IEE)

Multiple-activity DAPS with unidentified activities or sites, which are not yet well defined, may be best served by an "umbrella" IEE (the term "programmatic" IEE is also used)

Although not common, there may be some TII activities that are carrying out multiple activities (often small-scale) that have yet to be designed/determined in significant detail, including the awarding of sub-grants to unidentified grantees In such a case, a PVO might considering using the umbrella IEE format (as developed by USAID's Africa Bureau) The umbrella IEE should include a proposed screening process and format (see the sample forms attached to Annex F in the Environmental Documentation Manual or in Appendix B of the *Environmental Guidelines for Small-Scale Activities in Africa*) to identify the environmental implications of potential activities or sub-grant requests Once the umbrella IEE is approved, CSs will use the proposed process/form for each site/sub-grant to assess the environmental consequences if any, and ensure that the activities supported with Title II will have no negative environmental effects (Note that **CSs are also free to develop their own project-specific screening forms, as appropriate**) The screening form should be attached to the umbrella IEE submission

Note also that with umbrella IEEs, each respective Mission and PVO, with the concurrence of the BHR BEO, will determine what level of sub-activity review and approval will be carried out by the USAID Mission, if any The PVO should discuss this with the Mission when developing its umbrella IEE

Annex F of the EDM provides instructions for preparation of an umbrella IEE As discussed in the EDM, Section 3 2, **when activities are not well defined, there are two choices One can either use an umbrella IEE or one can defer those activities for which insufficient information is available**, which will then require an amendment of the IEE before resources are obligated by USAID, or implementation of that activity can begin Note that the umbrella IEE preparation process described in EDM Annex F allows one to screen and prepare environmental reviews of each activity as the information becomes available

Umbrella IEEs may only be approved if the CS meets the following conditions (see Figure F-1 of the EDM Annex F), which include (a) demonstrated CS capacity to carry out environmental reviews (may include environmental compliance training), (b) post-IEE screening of appropriate activities or clusters of activities, (c) following environmental review process as part of planning and design, (d) conducting monitoring and mitigation as appropriate, and (e) reporting on the status of environmental compliance in the Annual, TII Results Report, as well as to the Mission Environmental Officer, as requested.

Annex D 2

USAID ENVIRONMENTAL PROCEDURES
TEXT OF TITLE 22, CODE OF FEDERAL REGULATIONS, PART 216 (Reg 216)

ENVIRONMENTAL PROCEDURES[1]

These procedures have been revised based on experience with previous ones agreed to in settlement of a law suit brought against the Agency in 1975 The Procedures are Federal Regulations and therefore, it is imperative that they be followed in the development of Agency programs

In preparing these Regulations, some interpretations and definitions have been drawn from Executive Order No 12114 of 4 January 1979, on the application of the National Environmental Policy Act (NEPA) to extraterritorial situations Some elements of the revised regulations on NEPA issued by the President's Council on Environmental Quality have also been adopted. Examples are The definition of significant impact, the concept of scoping of issues to be examined in a formal analysis, and the elimination of certain USAID activities from the requirement for environmental review

In addition, these procedures 1) provide advance notice that certain types of projects will automatically require detailed environmental analysis thus eliminating one step in the former process and permitting early planning for this activity, 2) permit the use of specially prepared project design considerations or guidance to be substituted for environmental analysis in selected situations, 3) advocate the use of indigenous specialists to examine pre-defined issues during the project design stage, 4) clarify the role of the Bureau's Environmental Officer in the review and approval process, and 5) permit in certain circumstances, projects to go forward prior to completion of environmental analysis

Note that only minimal clarification changes have been made in those sections dealing with the evaluation and selection of pesticides to be supported by USAID in projects or of a non-project assistance activity

Sec	Topic
216 1	Introduction
216 2	Applicability of procedures
216 3	Procedures
216 4	Private applicants
216 5	Endangered species
216 6	Environmental assessments
216 7	Environmental impact statements
216 8	Public hearings
216 9	Bilateral and multilateral studies and concise reviews of environmental issues
216 10	Records and reports
Authority	42 U S C 4332, 22 U S C 2381
Source	41 CFR 26913 June 30 1976

§216 1 INTRODUCTION

(a) Purpose

In accordance with sections 118(b) and 621 of the Foreign Assistance Act of 1961, as 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

1 Title 22 of the Federal Code of Federal Regulations, Part 216, with preamble, is presented here in its entirety Spelling errors have been corrected from the original This represents the most recent version, dated October 9, 1980

Even with a "re-engineered" assistance process, USAID must fully comply with 22 CFR 216, except to the extent some of its terms are not used in the new operations assistance processes (i e PID, PP, etc) In those cases the terms used in the Automated Directives Sytstem (ADS, which are intended to be as parallel as possible to the original terms) are used instead However, 22 CFR 216 is controlling in the event of a conflict between ADS Chapter 204 on USAID's Environmental Procedures and 22 CFR 216 If there are questions, consult your BEO, the AEC, or Agency legal counsel

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 basic problems as hunger, malnutrition, overpopulation, disease, disaster, deterioration of the environment and the natural resource base, illiteracy as well as the lack of adequate housing and transportation Pursuant to the FAA, 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 multidonor project when A.I D does not control the planning or design of the multidonor 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 of 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 exemption is made under paragraphs (b)(l) (ii) and (iii) of this section, but is not required for projects, programs or activities under paragraph (b)(l)(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 and 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 control over, the details of 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 affect 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 of Part I of the FAA (22 USCA §§2151 p (b) 2220a. (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, waste 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 assist in 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 L 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, is 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 mechani zation,

(vi) New lands development,

(vii) Resettlement projects,

(viii) Penetration road building or road improvement projects,

(ix) Powerplants,

(x) Industrial plants,

(xi) Potable water and sewerage projects other than those that are small-scale.

(2) An Initial Environmental Examination normally will not be necessary for activities within 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)(l) 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 with the 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 Environ-mental 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 in this section.

(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 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 determining the scope 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 a 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 plan-ning 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 Officer 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, 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 or 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 an 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 goods 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 envi-

ronmental 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 ongoing programs are revised to incorporate a change in scope or nature, a 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 used.

(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)(l)(i) through (v) 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 nontarget ecosystems,

(h) The conditions under which thepesticide is to be used, including climate, flora, fauna, geography, hydrology, and soils,

(i) The availability and effectiveness of other pesticides or nonchemical 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 the 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 (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)(l)(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 reregistration *[since 1985, known as Special Review]*, 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)(l)(i) above

(iv) Notwithstanding the provisions of §216 3(b)(l)(i) 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 reregistration, 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 actions 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)(i) 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 exist, 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 the in 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 Environmental 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 proposed 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 environment or any irreversible 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 alternative 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 less 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 Environmental Assessment should include discussions of direct effects and their significance, indirect 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 reuse 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 or 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 Missions, 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 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 class 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 actions 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

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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 adopted by A I D Notice of the availability of such documents 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 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 material shall be governed by 22 CFR Part 9 Those portions of an Environmental Assessment which are not 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 of 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 comply with the CEQ Regulations With respect to effects on the United States, the terms environment and significant effect wherever used in these procedures have the same meaning as in the CEQ Regulations rather than as defined in §216 l(c)(12) and (13) of these procedures

(c) Other Effects Content and Form

An Environmental Impact Statement relating to paragraphs (a)(l) 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 affected 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 affected 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 a 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

(22 U S C 2381, 42 U S C 4332)
Dated October 9, 1980
Joseph C Wheeler
Acting Administrator

Annex E

Sample Tables, Matrices, and Environmental Checklists

Annex E 1 Example Summary Table Synopsis of Environmental Decisions for DAP/PAA Activities by [PVO] FY 1998

Annex E.2 Sample Checklist for Project Analysis

Annex E 3 Checklist of Environmental Characteristics Department of Environmental Affairs, Republic of South Africa

Annex E 4 Sample of an Environmental Impact Matrix

Annex E 5 Examples of Networks

a Potential Impact of the Construction Period

b Section of the IMPACT Network addressing Herbicide Application

Annex E 1

Example Summary Table Synopsis of Environmental Decisions for DAP/PAA Activities by [PVO] FY 1998

Note 1 This is an example only Information entered is preliminary and illustrative only, based on Title II activities in Ethiopia It parallels the Strategic Objective and Intermediate Results (IR) structure of the DAPs, which is meant to facilitate linkage to regular planning and results reporting tools]
Note 2 % of T II = proportion of Title II resources apportioned to the line items, with subtotals if possible]

Geographic attributes and operating principles USAID-funded DAP activities are sited *[give overall details on broader distributional factors and operating principles]*

Types of Activities/ Interventions/Components *[develop under sub headings of major activities with more detail rather than less]*	**Geographic Distribution, Location** *[this may be adequately addressed at top left]*	**Sites/Projects (number, other)** *[at lowest practical level]*	**Scale & Quantity** *[give as much detail as practical]*	**Unit** *ha etc [> 1 unit is poss]*	**% of Title II Resources**	**Expected Determinations** *[preliminary only CE ND or PD]*
IR 1 Increased Agricultural Crop Production						
Farmers training in general agriculture, irrigation, agronomy, vegetable production, etc	Tigray, Oromyia, SNNPR	Adama, Damota II, Kite Awalaelo, Shone and Tiya	approx 500 farmers trained for 3 6 days FY 98	people	2 5	CE with provisions for training in environmental sustainability principles and practices
Agricultural extension and demonstration of improved agricultural practices (e g improved seeds, fertilizers, planting methods, crop protection)	Tigray Oromyia	Adama, Kite Awalaelo	300 farmers to field days on 5 cooperative farmers' fields	number of events/ farmers	2	CE with provisions for training in environmental sustainability principles and practices
Agricultural credit provision—tied to those trained in program	Tigray, Oromyia SNNPR	Adama, Damota II, Kite Awalaelo, Shone, Tiya	cash to be disbursed to 1,560 farmers	funds/ number of farmers	2	CE or ND with conditions when indirect env harm could result from lending activities

Annex E 1

Types of Activities/ Interventions/Components *[develop under sub-headings of major activities, with more detail rather than less]*	**Geographic Distribution, Location** *[this may be adequately addressed at top left]*	**Sites/Projects (number, other)** *[at lowest practical level]*	**Scale & Quantity** *[give as much detail as practical]*	**Unit** *[more than one is poss]*	**% of T II**	**Expected Determinations** *[preliminary only]*
Earth fill dam construction	Tigray, Oromia	Kite Awalaelo, Tiya	5 dams ea 1 M m3 capacity over 5 yrs 2 dams ea 0 2 M m3 capacity 1999 & 2000	no /cu m	30	PD, which could be addressed through PEA, including ponds, microbasins, water supply, etc
Diversion of river water for irrigation ("river diversion")	Tigray	Kite Awalaelo	10 km diversion scheme 99-01	km	2	PD or ND with conditions
Road rehabilitation/construction - feeder roads maintenance - ford construction - small wooden bridge construction	Tigray, Oromyia Adama, Damota, Kite Awalaelo, Shone, Tiya	45 PAs	380 km of roads in and 14 small bridges will be constructed during the five years under the FFW program	km	12	ND with conditions? PEA may be done
Subtotal %						

Types of Activities/ Interventions/Components: *[develop under sub-headings of major activities, with more detail rather than less]*	**Geographic Distribution, Location** *[this may be adequately addressed at top left]*	**Sites/Projects (number, other)** *[at lowest practical level]*	**Scale & Quantity** *[give as much detail as practical]*	**Unit** *[more than one is poss]*	**% of T II**	**Expected Determination** *[preliminary only]*
IR 2 Increased Household Income						
Farmers' training in micro enterprises and business skills (basketry, beekeeping, agroforestry, soap and candle making, pottery, etc)	Adama, Damota II, Shoneand Fiya in Oromia and SNNPR	90 PAs	Over 5 years, 230 farmers in beekeeping, 2,500 in agroforestry, 2,100 in IGA	no	1 8	CE with provisions for training in environmental sustainability principles and practices
Tree crop seedling production and distribution (coffee, fruit trees)			100,000 to 1,000,000 farmers	no	2	ND
Subtotal %						
IR 3 Improved Health Status in Target Areas health and nutrition education, food supplementation						
Training in nutrition, food storage and preservation					1	CE
Potable water supply Pond construction/rehabilitation			65 ponds max 40,000 cu m	no /cu m	5	PD or ND with conditions TBD relating to mitigation and monitoring

Annex E 1

Types of Activities/ Interventions/Components *[develop under sub-headings of major activities with more detail rather than less]*	**Geographic Distribution, Location** *[this may be adequately addressed at top left]*	**Sites/Projects (number, other)** *[at lowest practical level]*	**Scale & Quantity** *[give as much detail as practical]*	**Unit** *[more than one is poss]*	**% of T H**	**Expected Determinations** *[preliminary only]*
Drilling bore holes	Adama, Kilte Awlaelo and Shone in Tigray, Oromia and SNNPR	35 PAs	35 bore holes, 2 with 150 m depth at Adama, 3 @ 120 m depth at Shone and 30 with 60 m depth at Kilte Awlaelo during 5 yrs	no , m depth	4	ND with conditions relating to aquifer protection, use of proper engineering, water committees will be formed and trained
Water management committees formed and functioning, linked to bore hole, water supply activities				no	2	CE with provisions for training in environmental sustainability principles and practices
Constructing demo latrines		Tiya	5 in 1997	no	0 5	CE with provisions for hygiene mitigation
Subtotal %						
IR 4 Natural Resource Base Maintained						
Farmer training (soil and water conservation techniques, mud technology, fuel efficient mud stove making, etc)					2	CE with provisions for training in environmental sustainability principles and practices

Annex E 1

Tree seedling production/nurseries		community nurseries, PVO	11 5 M seedlings	no	2 5	CE or ND w/good practices and technical accuracy
Tree seedling planting		sites	11 4 Million	no	2	ND without conditions
Hillside terrace construction		sites	370 km during 5 yrs	km	4	ND with conditions involving a subsequent screening and review process with mitigation measures identified
Hillside terrace maintenance		sites	3000	km	2	ND with conditions
Check dam construction		sites	25	no	2	ND with conditions
Soil bund construction		sites	1990	km	3	ND with conditions
Microbasin construction for tree establishment		sites	125,000 basins max 2 sq m in 1998- 99	no	1	ND with conditions
Biological conservation measures (area closure, living mulches, etc)		59 sites	50 closures of avg 100 ha	no	3	ND with conditions activities must be defined and separately screened
Subtotal %						
IR 5· Emergency Response Capacity Maintained						
Studies and plans			5	no	0 5	
Subtotal %						
Grand Total %						

Acronyms ADP Area Development Program, CE Categorical Exclusion, EA Environmental Assessment, ND Negative Determination, PD positive Determination, PA Peasant Associatons, PEA Programmatic Environmental Assessment, TBD to be determined

Annex E.2

Sample Checklist for Project Analysis

Project Activity	Potential Environmental Impacts	Recommended Mitigation Action	Degree of Environmental Impact

Annex E 3

GUIDELINE DOCUMENT 5
CHECKLIST OF ENVIRONMENTAL CHARACTERISTICS

Project managers W D M Fourie and P Claasen

Department of Environment Affairs

Baseline studies prepared by R F Fuggle, G R Preston, M R Sowman, N Robins, R Short, S A Grindley, R C Hill, R B Stauth, J P Raimondo, S M Fowkes, S B Lane, J A Barker and J Glazewksi

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Department of Environment Affairs 1992 *Checklist of Environmental Characteristics*

CONTENTS

1 INTRODUCTION

This checklist identifies environmental characteristics which may potentially be affected by development actions, or which could place significant constraints on a proposed development The effect a development could have on an environmental attribute may be either positive or negative

While the checklist has endeavored to include the major characteristics and linkages which should be considered by the environmental analyst or planner, it is not exhaustive and the user should be aware that other characteristics, significant to a particular situation, may occur Assistance of experts may be required to assess certain potential impacts and to identify unlisted characteristics which may be affected in specific cases It is important to stress that cumulative effects should always be borne in mind (see section 12)

2 PHYSICAL CHARACTERISTICS OF THE SITE AND ITS SURROUNDINGS

Could the proposed development have a significant impact on, or be constrained by, any of the following?

2 1 Land

- the nature of surface (e g old weathered surfaces)
- the nature of substrata (e g rock, soil deposit)
- unstable bedrock or fault lines
- seismic activity
- slope of the land
- water logging of depressions
- the binding or bonding of soils
- stability of site
- surface subsidence
- compressive strength of soils
- rates of erosion or sitation by wind or water
- the potential of soils to be used for formal/informal agricultural purposes
- the potential of soils to be used for commercial purposes
- access to mineral deposits
- the availability of or access to construction materials such as rock and gravel
- the availability of topsoil or fill material
- the management of excess soil or spoil material
- unique geological or physical features
- mobile sand dunes
- prominent landscape feature
- existing physical degradation of the local environment

2 2 Freshwater systems

- streams or river channels
- river flow
- natural drainage patterns
- engineered drainage patterns
- drainage limitations
- the water-table
- run-off as a result of the hardening of surfaces, or loss of the sponge effect of vegetation
- ability to absorb run-off
- changes to flood plains
- the quality or quantity of surface water, groundwater or public water supplies
- conservational or recreational value of rivers, streams, lakes, wetlands, dams or islands
- threats to hydrological functioning through existing or altered
  - pollution
  - turbidity
  - salinity
  - chemical processes or nutrient balances
  - changes in sediment flows and siltation rates
  - canalization
  - impoundment construction
  - water extraction

2 3 Marine and estuarine systems

- prominent coastal features such as coastal cliffs
- existing or altered processes such as
  - wave and tidal action
  - deposition/removal of sand
  - sedimentation rates and patterns
  - turbidity
  - salinity
  - chemical processes or nutrient balances
- inherently unstable ecosystems such as mobile sand dunes
- sand sources such as mobile sand dunes
- rocky and sandy shorelines
- the seabed and subtidal areas

- coastal islands
- functioning of estuary systems
- river mouths

2 4 Climate

- wind strength direction and frequency
- frequency of flash-floods
- rainfall patterns
- fluctuations in temperature or humidity
- intensity of inversions
- dispersal or influx of pollutants
- global warming and sea-level rise

3 ECOLOGICAL CHARACTERISTICS OF THE SITE AND ITS SURROUNDINGS

Could the proposed development have a significant impact on, or be constrained by, any of the following?

3 1 Vegetation

- survival of rare or endangered plant species
- diversity of plant communities
- sand-trapping vegetation such as that found on foredunes
- vegetation communities of conservation or scientific importance
- conservation of vegetation communities of particular recreational value
- the introduction or spread of invasive alien seeds and plants
- natural replenishment of existing species
- frequency of veld fires
- frequency of use of off-road vehicles
- amount of trampling of special areas of vegetation
- firewood collection
- overgrazing
- overexploitation
- genetically engineered organisms

3 2 Animals

- survival of rare or endangered animals
- diversity of animal communities
- animal communities of particular scientific, conservational or educational value
- natural migration of species
- survival of animal communities of particular recreational value
- non-resident or migrant species
- alien species (including invasive and domestic species)
- survival of animal communities due to
  - frequency of veld fires
  - threat from poaching
  - frequency of use of off-road vehicles
  - intrusion of roads and fencing
  - overexploitation
- genetically engineered organisms

3 3 Natural and semi-natural communities

- local, regional or national importance of the natural communities (e g economic, scientific, conservational, educational)
- compatibility of the development and the natural communities
- appropriateness of conservation methods to be employed
- ecological functioning of natural communities due to
  - physical destruction of the habitat
  - reduction in the effective size of the community
  - quality and flow of groundwater
  - quality of standing or flowing water
  - oxygen content of the water
  - salinity
  - turbidity
  - flow rate
  - temperature
  - level of chemical and other forms of pollution
  - eutrophication
  - toxins such as effluents or poisons
  - siltation patterns
  - air quality
  - levels of dust pollution and deposition
  - availability of food
  - the construction of access routes roads and pathways
  - recreational pressure
  - secondary or cumulative impacts affecting other natural communities
  - presence or introduction of invasive alien species
  - rehabilitation potential
  - predator prey relationships
  - barriers to animal movement or migration
  - altered fire regime

4 CURRENT AND POTENTIAL LAND USE AND LANDSCAPE CHARACTER

Could the proposed development have a significant impact on, or be constrained by, any of the following?

4 1 General considerations applicable to all development proposals

- compatibility of land uses within the area
- aesthetic quality of the landscape
- sense of place within the area
- character of the area
- compatibility with the scale of developments in the area
- compatibility with building materials used in the area
- preservation of scenic views and valued features
- revitalization of run-down areas
- landscaping plans and/or site restoration proposals
- need for buffer zones to allow for natural processes such as coastal erosion, windblown sand and changes in river channels
- political considerations such as land claims and historical rights
- legal considerations such as servitudes and rights of way

4 2 Urban open space, protected and recreational areas

- urban open space systems or recreational areas
- natural features such as streams and ridges
- natural heritage sites
- change in use or intensity of use
- pressures on recreational facilites and open space systems
- enhancement or linkage of facilites and open space systems
- rehabilitation of disturbed or degraded sites
- improved public amenity
- potential for harboring vagrants and criminals

4 3 Residential areas

- need to displace people or affect existing housing
- lifestyle, neighborhood character or stability
- quality of life withing the residential area
- effect on views, overlooking and privacy
- effect of overshadowing causing loss of sunlight hours
- compatibility with the surrounding residential developments
- community cohesion
- the needs of the elderly, handicapped or other special interest groups
- community safety aspects such as lighting, open areas and policing
- adequacy of infrastructure to service the area (see also section 7)
- access and movement patterns
- change in the volume of through traffic
- property values and local tax base

4 4 Commercial areas

- character of urban centre
- volume of traffic and adequacy of vehicular access
- inappropriate siting
- provision of parking
- adequacy of pedestrian walkways
- conflicts between vehicular and pedestrian traffic
- safety of the area and surveillance
- the rate of decay or change in character of the area

4 5 Industrial areas

- volume of traffic and adequacy of vehicular access
- provision of parking
- levels of pollution - gas emissions, effluent or solid waste
- polluted street run-off
- aesthetic quality of the area

4 6 Agricultural and sylvicultural areas

- use of high-potential farmland
- use of areas available for commercial forests
- a need for buffer zones or greenbelts to contain urban sprawl
- availability of water
- pollution levels of air and local water

supplies by fertilizers, pesticides or feedlots
- disease control activities such as cropspraying
- levels of toxins, dust and bad smells in the air
- rate of soil erosion and sedimentation
- bush encroachment
- damaged land due to overgrazing or bad farming methods
- spread of invasive alien plants
- provision of housing and educational facilities

5 CULTURAL RESOURCES

Could the proposed development have a significant impact on, or be constrained by, any of the following?

- structures and sites of architectural, cultural or historic heritage
- sites of archaeological or palaeontological importance
- special attraction of local sites traditions or events
- sites or areas of religious or spiritual significance
- sites or areas of special social or cultural interest
- the integrity of cultural resources

6 SOCIO-ECONOMIC CHARACTERISTICS OF THE AFFECTED PUBLIC

Could the proposed development have a significant impact on, or be constrained by any of the following?

6 1 Demographic aspects

- growth rate of the local population
- location, distribution or density of the population
- existing age or gender composition of the population
- existing biographical composition of the population
- existing migration movements
- inflow of tourists

6.2 Economic and employment status of the affected social groups

- economic base of the area
- distribution of income
- local industry
- rate and scale of employment growth
- labor needs and the spare labor capacity of the area
- movement of labor away from existing employment in the area
- competition through non-local labor moving into the area
- non-local labor remaining in the area after completion of the development
- pressure placed on particular skills, age range or gender needs
- job opportunities for school-leavers
- short- and long-term unemployment trends

6 3 Welfare profile

- incidence of crime, drug abuse, or violence
- extent of homelessness and overcrowding
- adequacy of services
- adequacy of support systems such as creches and shelters for destitute children
- quality of life (see also section 7 on infrastructure and section 8 on community services and facilities)

6 4 Health profile

- availability of clinics/health services
- incidence of disease
- incidence of mental illness
- threats to health from pollution (see also section 9 on pollution)

6 5 Cultural profile

- existing lifestyles, household composition and family network
- religious and cultural attitudes outlooks and expectations of the local population
- cultural or lifestyle diversity
- cultural or lifestyle stability

7 INFRASTRUCTURE SERVICES

Could the proposed development have a significant impact on, or be constrained by, any of the following?

7 1 Energy supply

- the demand for power and its effect on

  - hazard and operatability reviews
  - failure mode and effect analysis
- workers' safety/degree of risk
- the level of risk and hazard for other living organisms

11 HEALTH AND SAFETY

Could the proposed development have a significant impact on, or be constrained by, any of the following?

- effects in the workplace through
  - dust, fume and particulate matter
  - noise
  - odors
  - gases
  - vapors
  - use of dangerous chemicals
  - lighting
  - heat
  - cold
  - noise
  - vibration
  - radiation
  - protective clothing and equipment
  - access to recreational facilities
  - risk of workplace accidents
  - risk of major disasters involving multiple loss of life or injury
  - availability of services such as creches, factory-based health services, canteens, change-rooms, toilets
- effects in the surrounding areas through
  - dust
  - fumes
  - particulate matter
  - noise
  - vibration
  - radiation
  - odors
  - gaseous emissions
  - vapers
  - use of dangerous chemicals
  - lighting
  - risk of major disasters involving explosions or major leaks of toxic liquids or gases
  - solid waste disposal techniques
  - liquid waste effluent and disposal

12 CUMULATIVE AND SYNERGISTIC EFFECTS

Could the proposed development have a significant impact on, or be constrained by, any of the following?

- the ability of the natural and social environments to assimilate cumulative stresses placed on them
- the likelihood of negative synergistic effects
- existing or future development rights because of a precedent being set

13 ENHANCEMENT OF POSITIVE CHARACTERISTICS

Could the proposed development be modified to enhance the positive aspects of the following?

- any of the characteristics listed in points 2 to 12 above

9 2 Water pollution

- level of water pollution
- high localized levels of pollution
- pollution of surface waters from polluted underground waters
- the concentration of pollutants due to variations of water flow
- localized pollution build-up through changes in salinity gradients and/or current movements
- effective dispersal mechanisms
- salinization of fresh waters
- synergistic or compounding effects with existing pollutants
- production of offensive odor
- effect of treated or untreated effluent on the flora and fauna of river, lake, canal, estuary or coastal waters
- effects on dependent natural communities through changes in aquatic fauna and flora
- effect on irrigation schemes
- effect on recreational activities

9 3 Noise, vibration and lighting

- increase in ambient noise, vibration or illumination levels
- length of time that there will be noise, vibration or lighting impact
- exacerbation of "creeping" ambient noise levels
- peace and quiet of residential areas either during day- or night-time
- change in the quality of life due to artificial lighting
- functioning of schools, hospitals and old people's homes or informal recreation areas
- the need for individual protection against noise
- levels of annoyance and discomfort due to vibration caused by such activities as blasting and pile-driving
- structural damage caused to buildings by vibration
- effects on wildlife of nature reserves, sites of special scientific interest, or high-quality habitat of local significance
- reduction of wilderness quality in declared wilderness areas

9 4 Visual pollution (see also section 4 on land use and landscape character)

- existing level of visual pollution
- reduction in aesthetic quality of the environment through
  - sign-boards and advertising
  - overhead transmission cables and telephone wires
  - unsightly or inappropriate walls, buildings roads or other installations

9 5 Solid or liquid waste and by-product disposal

- existing or proposed water disposal plans
- choice of alternative means of disposal
- alternative treatment technologies
- choice of disposal sites
- biological and chemical characteristics of the leachates generated within the disposal site
- the quantity of leachates produced
- measures to reduce or treat leachates
- potential pollution of nearby surface waters
- potential groundwater pollution
- waste minimisation potential of process
- containment and treatment of wastes at site of generation
- final disposal option
- gas emissions from landfill
- allowance for physical and chemical variation in waste generated
- visual intrusion caused by waste disposal site or disposal plant
- potential health hazard to nearby residents
- suitability of traffic to transport the waste materials
- volume of traffic to transport the waste materials
- proposed after-use of the sire and its management

10 RISK AND HAZARD

Could the proposed development have a significant impact on, or be constrained by, the following?

- the level and identity of hazard to the public
- probability of occurrence
- extent of effect - local, regional or panoramic
- standards required for process equipment in chemical and processing industries
  - safety and design reviews
  - safety audits

existing housing
- location for suitable housing sites
- sites suitable for construction camps
- standard of provision of facilities required by authority
- design and layout of site facilities
- use to which construction camp may be put after termination of the construction period

7 7 Telecommunication

- existing telecommunication network
- installation of additional telecommunication transmission lines or facilities

7 8 Financial implications to region

- job creation and economic opportunity
- enhancement of regional self-sufficiency
- financial programmes of responsible authority
- comparative wage rates between those of existing employment in the local area and those offered by the new development
- movement away from existing employment due to higher wage rates offered in the new development
- insurance rates
- cost implications of the supply of energy, water, waste management, transportation, education, housing and telecommunication

8 SOCIAL AND COMMUNITY SERVICES AND FACILITIES

Could the proposed development have a significant impact on, or be constrained by, any of the following?

8 1 Health service facilities

- adequacy of temporary facilities during construction phase of developments
- adequacy of on-site health facilities
- adequacy of facilities for primary health care (e g screening facilities for tuberculosis or AIDS, family planning advice)
- adequacy of the existing health services to cope with increased population
- projected provision of health service facilities
- need for additional facilities

8.2 Emergency services

- adequacy of existing emergency services (e g fire and ambulance services)
- projected provision of services to meet increased demand
- need for additional emergency services
- adequacy of the emergency and safety services provided by he developer
- ability of the local resources to deal with emergencies

8 3 Recreational facilities

- adequacy of existing facilities
- projected provision of facilities to meet increased demand
- need for additional facilities
- recreational and service facilities in the workplace

9 THE NATURE AND LEVEL OF PRESENT AND FUTURE ENVIRONMENTAL POLLUTION

Could the proposed development have a significant impact on, or be constrained by, any of the following?

9 1 Air pollution

- existing levels of atmospheric pollution
- the nature of air pollution, such as ozone-depleting gases, acidic compounds and toxic substances
- extent of the local build-up of pollutants due to inversions
- compounding of effects with existing pollutants or other chemicals in the atmosphere (e g photochemical smog production)
- smog formation and reduction in visibility
- quantity and type of particulate matter produced with reference to size, composition and chemical stability
- production of offensive odors
- pollution of adjacent sensitive areas
- effects on human health crops, wildlife, livestock and other potentially affected organisms
- effects on stonework, buildings or works of art

peak and base loads
- planned provision of power for the area
- power generation and associated infrastructure
- the need for new transmission lines
- the adequacy of emergency power facilities
- the danger to the local community and the environment or processing units in the case of a major power failure
- availability of alternative fuel source

7 2 Water

- water rights
- wasteful or excessive water requirements
- planned provision for water supply to the area
- adequacy and reliability of water supply
- adequacy of ground water reserves
- adequacy of emergency supply system
- need for additional abstraction schemes or construction of new supply reservoirs
- need for additional purification systems
- need for inappropriately sized or located impoundments
- need for new pipelines
- danger to local people and industry in the event of a major water supply failure

7 3 Waste management

- efficiency and capacity of existing waste management facilities
- extent of contribution to centralized waste-processing facilities
- ability to provide necessary facilities
- need for new pipelines
- risk associated with waste transport
- adequacy of emergency waste disposal facilities
- risk to the community and the local environment should the facility break down
- hazard of groundwater pollution
- danger of rodents and scavengers at waste sites
- potential for windblown or waterborne refuse pollution
- visual and smell effects of waste sites and treatment works
- hazard of birds to air traffic near sewage ponds and landfill sites
- utilization of treated waste water and recycled materials
- on-site waste management potential

7 4 Transport networks

- existing transport systems
- present patterns of circulation or movement of people and/or goods
- generation of more private and public traffic
- adequacy of existing road network
- adequacy of existing parking facilities
- adequacy of existing traffic management schemes
- need for and desirability of additional road schemes over and above those which have been planned
- temporary access roads used for the development
- viability of the rail service
- rail capacity
- need for additional rail links
- adequacy of harbor facilities
- need for expanded harbor and related facilities
- adequacy of air transport facilities
- ability of commerce and social facilities to locate along route

7 5 Education

- demand for specific type of technical skills training
- demand for specific types of industrial training
- adequacy of existing technical institutions
- adequacy of nursery, junior and secondary education facilities
- need for additional education facilities
- demand which exceeds the planned provision of educational facilities
- preschool facilities

7 6 Housing

- property values and levels of rates
- potential conflict over land use
- availability of housing stock
- need to release additional land for housing developments
- acceptability of such land release
- adequacy of infrastructure for further housing developments
- ability of private or local authority to provide housing
- compatibility of planned development with

Annex E4

PROJECT IMPACT MATRIX - RURAL WATER SUPPLY AND SANITATION POTENTIAL IMPACTS

PROJECT COMPONENTS	ENVIRONMENTAL COMPONENTS	PHYSICAL ENVIRONMENT										BIOLOGICAL ENVIRONMENT										SOCIAL ENVIRONMENT										
		AGRICULTURAL LANDS	SOIL EROSION	SLOPE STABILITY	ENERGY/MINERAL RESOURCES	SURFACE WATER QUANTITY	SURFACE WATER QUALITY	GROUND WATER QUALITY	GROUND WATER QUANTITY	AIR QUALITY	NOISE	AQUATIC ECOSYSTEMS	WETLAND ECOSYSTEMS	TERRESTRIAL ECOSYSTEMS	ENDANGERED SPECIES	MIGRATORY SPECIES	BENEFICIAL PLANTS	BENEFICIAL ANIMALS	PEST PLANTS	PEST ANIMALS	DISEASE VECTORS	PUBLIC HEALTH	RESOURCES/LAND USE	DISTRIBUTION SYSTEMS	EMPLOYMENT	AT RISK POPULATIONS	MIGRANT POPULATIONS	COMMUNITY STABILITY	CULTURAL/RELIGIOUS VALUES	TOURISM/RECREATION	NUTRITION
PLANNING AND DESIGN	SOURCE SURFACE WATER	●	•	•		○●	○●					○●	•	○●	○●	○●	○●	○●	•		●	●	○●	○●	○●	○●	○●	○●	○●	○	○
	SOURCE SPRINGS	•				•	•					•	●	•	•	•	•	•			○●	○●	○●	○●	○●	○●	○●	○●	○●	○	○
	SOURCE GROUNDWATER	•			•			•	•				•										○●	○●	○●	○●	○●	○●	○●	○	○
	COLLECTION/TRANSMISSION	●	●	●	•	○●	○●					○●	○●	•	•	•	•	○●	•		●	•	○●	○●	○●	○●	○●	○●	○●	○●	○●
	RAW WATER TREATMENT				•		•		•			•	•									○	○●	○●	○●			○●		○	
	STORAGE/DISTRIBUTION				•															○●	○●	○●	○●	○●	○●	○●	○●	○●	○	○●	○●
	USE CONTROLS					○●		○●					○●								○●	○●	○●	○●	○●	○●	○●	○●	○●	○●	○●
	DRAINAGE/COLLECTION SYSTEMS	○●	○●			○●	○●		○●			○●	○	○●					●	●	○●	○●	○●	○●	○●	○●	○●	○●	○●	○●	
	SANITATION FACILITIES				○		○●		○●	○●		○●	○●							○●	○●	○●	○●	○●	○●	○●		○●		○●	
	WASTEWATER TREATMENT	○			○●		○		○●	○●		○●	○●	○●					○●		○●	○●	○●	○	○			○●	○●	○	
	WORKFORCE															•	•	•				•	○		○			○●			
CONSTRUCTION	CLEARING		•			•	•			•		•	•	•					•	•	•	•	○●								
	ACCESS ROADS	•	•	•		•	•			•	•	•	•	•					•		•	○●	○●	○●	○			○●			
	CONSTRUCTION ACTIVITIES	•	•	•	•		•		•	•	•	•	•	•							•	•					○●	○●			
	WORKFORCE SUPPORT																				•	•			•			○●			
	CONSTRUCTION WASTES						•		•	•		•	•	•							•	•									
OPERATION	SOURCE PROTECTION		○●			○	○●	○	○●			•	●												○	○●	○●				
	FACILITY MAINTENANCE	○●	○	○		○	○	○	○			○	○	○	○		○	○	○			○	○●	○●	○●	○●	○●	○●		○	
	WASTE MONITORING						○		○			○										○			○						
	WATER CONSERVATION	○	○		○	○	○	○	○			○	○	○									○	○		○	○	○		○	
	USER EDUCATION	○	○		○																○	○		○				○			

KEY

Beneficial		Adverse	
High	○	High	●
Medium	○	Medium	●
Low	○	Low	•

Reference Hazra Engineering Company 1980 *Environmental Design Considerations for Rural Development Projects* Washington DC USAID

Annex F4

PROJECT IMPACT MATRIX

PROJECT COMPONENTS	ENVIRONMENTAL COMPONENTS	PHYSICAL ENVIRONMENT										BIOLOGICAL ENVIRONMENT										SOCIAL ENVIRONMENT									
		AGRICULTURAL LANDS	SOIL EROSION	SLOPE STABILITY	ENERGY/MINERAL RESOURCES	SURFACE WATER QUANTITY	SURFACE WATER QUALITY	GROUND WATER QUALITY	GROUND WATER QUANTITY	AIR QUALITY	NOISE	AQUATIC ECOSYSTEMS	WETLAND ECOSYSTEMS	TERRESTRIAL ECOSYSTEMS	ENDANGERED SPECIES	MIGRATORY SPECIES	BENEFICIAL PLANTS	BENEFICIAL ANIMALS	PEST PLANTS	PEST ANIMALS	DISEASE VECTORS	PUBLIC HEALTH	RESOURCES/LAND USE	DISTRIBUTION SYSTEMS	EMPLOYMENT	AT RISK POPULATIONS	MIGRANT POPULATIONS	COMMUNITY STABILITY	CULTURAL/RELIGIOUS VALUES	TOURISM/RECREATION	NUTRITION
PLANNING AND DESIGN	SOURCE SURFACE WATER																														
	SOURCE SPRINGS																														
	SOURCE GROUNDWATER																														
	COLLECTION/TRANSMISSION																														
	RAW WATER TREATMENT																														
	STORAGE/DISTRIBUTION																														
	USE CONTROLS																														
	DRAINAGE/COLLECTION SYSTEMS																														
	SANITATION FACILITIES																														
	WASTEWATER TREATMENT																														
	WORKFORCE																														
CONSTRUCTION	CLEARING																														
	ACCESS ROADS																														
	CONSTRUCTION ACTIVITIES																														
	WORKFORCE SUPPORT																														
	CONSTRUCTION WASTES																														
OPERATION	SOURCE PROTECTION																														
	FACILITY MAINTENANCE																														
	WASTE MONITORING																														
	WATER CONSERVATION																														
	USER EDUCATION																														

KEY

Beneficial		Adverse	
High	○	High	●
Medium	○	Medium	●
Low	○	Low	●

Reference Hazra Engineering Company 1980 *Environmental Design Considerations for Rural Development Projects* Washington DC USAID

Annex 14

PROJECT IMPACT MATRIX

PROJECT COMPONENTS / ENVIRONMENTAL COMPONENTS		PHYSICAL ENVIRONMENT											BIOLOGICAL ENVIRONMENT										SOCIAL ENVIRONMENT										
		AGRICULTURAL LANDS	SOIL EROSION	SLOPE STABILITY	ENERGY/MINERAL RESOURCES	SURFACE WATER QUANTITY	SURFACE WATER QUALITY	GROUND WATER QUALITY	GROUND WATER QUANTITY	AIR QUALITY	NOISE	AQUATIC ECOSYSTEMS	WETLAND ECOSYSTEMS	TERRESTRIAL ECOSYSTEMS	ENDANGERED SPECIES	MIGRATORY SPECIES	BENEFICIAL PLANTS	BENEFICIAL ANIMALS	PEST PLANTS	PEST ANIMALS	DISEASE VECTORS	PUBLIC HEALTH	RESOURCES/LAND USE	DISTRIBUTION SYSTEMS	EMPLOYMENT	AT RISK POPULATIONS	MIGRANT POPULATIONS	COMMUNITY STABILITY	CULTURAL/RELIGIOUS VALUES	TOURISM/RECREATION	NUTRITION
PLANNING AND DESIGN																																
CONSTRUCTION																																
OPERATION																																

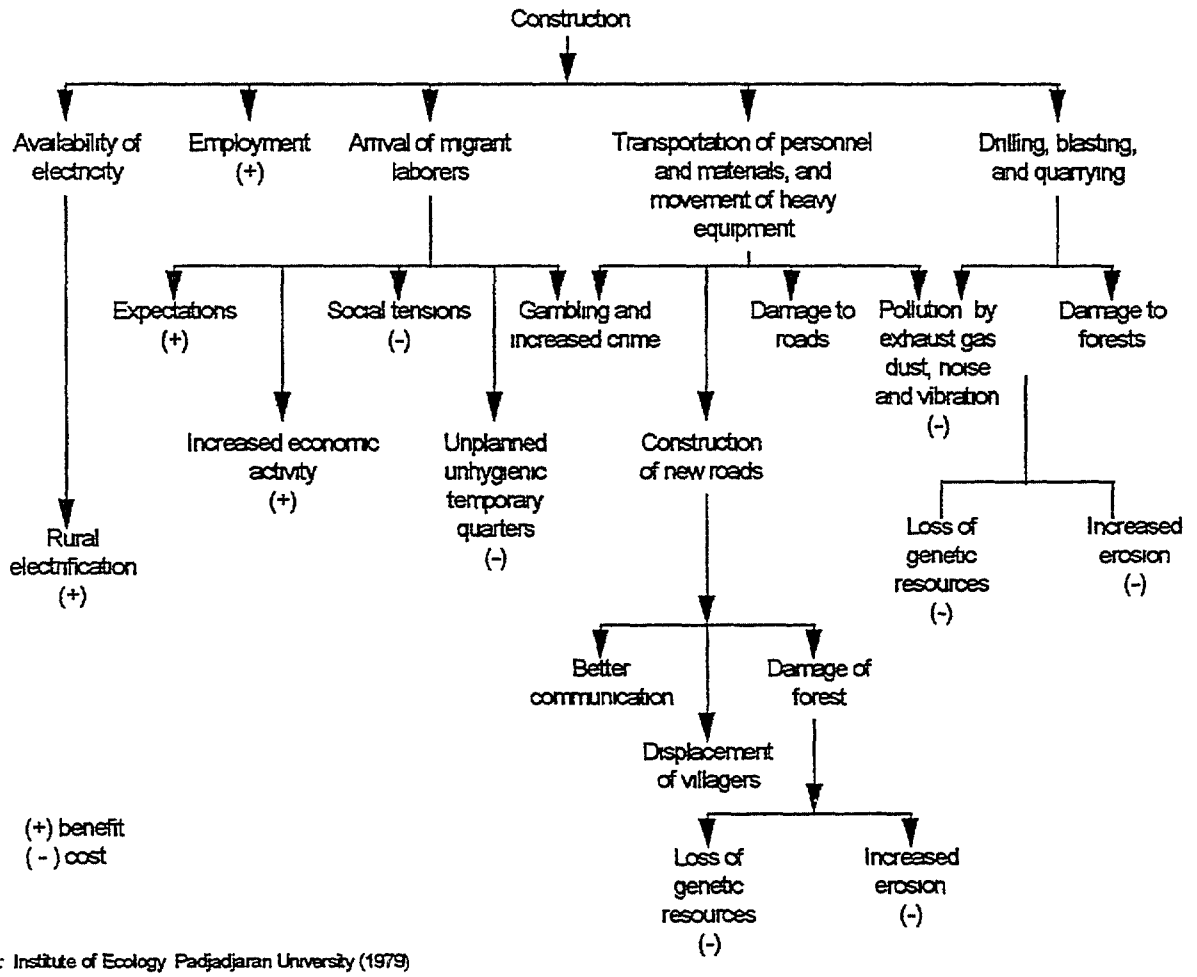
KEY

Beneficial		Adverse	
High	○	High	●
Medium	○	Medium	●
Low	○	Low	●

Reference Hazra Engineering Company 1980 *Environmental Design Considerations for Rural Development Projects* Washington DC USAID

Annex E.5

Figure E.1 Potential Impact of the Construction Period: Example of a Network



Source: Institute of Ecology Padjadjaran University (1979)

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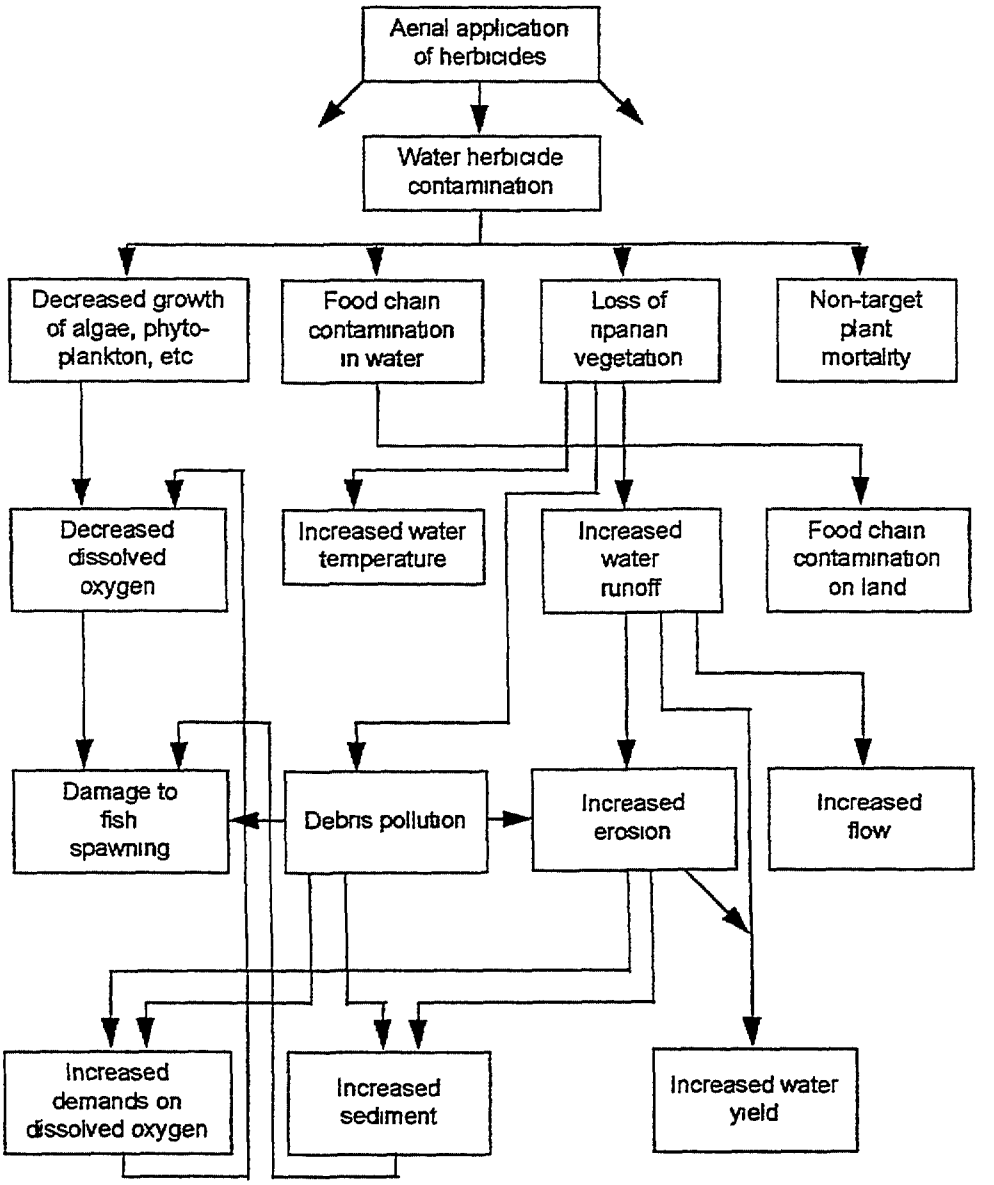
Figure E 2 Section of the IMPACT Network



Source Thor *et al.* (1978)

Annex F

Information on Use and Preparation of the Umbrella IEE and Use of Environmental Screening and Report Form

Attachment: Environmental Screening and Report Form for NGO/PVO Activities and Grant Proposals

NOTE: The process described here is entirely optional and open to adaptation. This umbrella process was designed by USAID's Bureau for Africa together with PVOs carrying out activities under umbrella grants in which there is a proposal review and sub-granting process. The reporting and accountability provisions are subject to change under Title II

A screening process is applied during the activity-design stage, and mitigation measures thereby identified are built into implementation. It has not yet been fully evaluated for applicability to Title II program contexts. Food for development resources may not be commonly used to provide grants to sub-recipients, but sub-granting does occur, and perhaps will be used increasingly in the future. Thus, the umbrella review process could be adapted to determine the need for environmental mitigation. Also, the screening process could be adapted to downstream review of activities whose specific design is completed after the DAP is approved.

Annex F

Information on Use and Preparation of the Umbrella IEE and Use of Environmental Screening/Report Form

F.1 What is an "Umbrella" IEE and When is It Used?[1]

An "umbrella" IEE addresses a **multiple sets of activities generally expected to be small in scale and where their nature is unknown or insufficient specific information is available** (such as engineering designs or siting data), when the IEE and/or DAP is being prepared. As mentioned in Section 3 3, an umbrella IEE may be appropriate if

- the DAP consists of multiple activities, most of which are small-scale **but not yet fully designed**, and which can be subjected to a subsequent review process defined by the CS, or
- the CS intends to implement a sub-granting program in which as-yet unidentified sub-recipients submit proposals for activities, and these proposals are to be linked to a subsequent environmental review process similar to that laid out below

An alternative to the umbrella IEE is doing an **IEE with a deferral of those activities for which insufficient information is available**, which will then require amendment of the IEE before you obligate funds for, or implement, that activity (as described in Section 3 3)

The "umbrella" IEE process allows you to deal with sets of yet-to-be-fully designed activities in a more generic fashion and engages you and your implementing partners in a subsidiary environmental screening and review process, once design and siting information has been obtained. This process allows you to screen and prepare environmental reviews of each activity or set of activities (grouped geographically or in some other fashion) as the information becomes available If you use the "umbrella" IEE with post-IEE environmental reviews, you should not implement the specific activity or group of similar activities until the screening and review process is complete, including USAID approval, if appropriate Note that with each umbrella IEE, the respective Mission and PVO, with the concurrence of the BHR BEO, will determine what level of sub-activity review and approval will be carried out by the USAID Mission, if any The PVO should discuss approval requirements with the Mission when considering an "umbrella" IEE

Approval of the "umbrella" IEE means that, in most cases, USAID approval of the subsequent environmental reviews (for specific activities or generic sets) is at the PVO or Mission level and does not require Washington concurrence While the Mission should be kept informed, Washington concurrence will only rarely be called for (e g., if an activity should trigger a positive threshold decision)

The Environmental Screening Form (ESF) that accompanies an "umbrella" IEE (see sample form at the end of Annex F) is used after the IEE has been approved. It guides you through the subsidiary screening, review and mitigation process for each set of activities as they are designed. The form itself is normally an integral attachment to the approved IEE It is meant to be **modified or adapted prior to IEE approval** to reflect the **unique suite of situations** that are most likely to be found under **yet to be defined multiple activities** Thus, the ESF to be used with a given "umbrella" IEE is typically **specifically tailored for that IEE**

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[1] Within USAID this has sometimes been referred to as a "programmatic" IEE concept, not to be confused with the Programmatic Environmental Assessment (PEA) described in Annex C

and review process for each activity in the DAP program as the information becomes available, and (b) once the IEE process of environmental screening and review is approved in Washington, all or most activities can be approved at the PVO or Mission level on the basis of local screening and review

F 2 Conditions on the Use of the "Umbrella" IEE

An "umbrella" IEE involves a negative determination *with conditions* This means that **Umbrella IEEs may only be approved if the PVO agrees to a certain set of conditions** (see Figure F 1), which include (a) demonstrated PVO capacity to carry out environmental reviews (may include attendance at environmental compliance training), (b) post-IEE screening of appropriate activities or clusters of activities, (c) following an environmental review process as part of planning and design, (d) conducting monitoring and mitigation as appropriate, and (e) reporting on the status of environmental compliance in the Annual TII Results Report, as well as to the Mission Environmental Officer, as requested.

If this approach seems potentially applicable, examine the sample IEE provided in Annex B-3 *' The Ethiopian NGO Sector Enhancement Initiative"* which contains the typical conditions for an "umbrella" IEE An "umbrella" IEE can use standardized language, described in detail below, since your ability to analyze activities is limited without information The applicability of the umbrella IEE approach to Title II activities is not known at this time, but it has been found useful in other situations involving multiple, small-scale activities about which detailed information is not available when the IEE needs to be prepared.

Figure F 1 illustrates the "umbrella" IEE concept

F 3 Advice on Preparing Sections 1 0 through 4 0 of an "Umbrella" IEE

In preparing the umbrella IEE, you will find the principles and advice offered in Section 4 0, to be pertinent to a large extent Below are some annotations and advice based on experience with the umbrella IEE approach, involving subgrants by the lead PVO to sub-recipients In preparing these four sections it will be helpful if you **refer to the IEE on the Ethiopia NGO Sector Enhancement Initiative, provided in Annex B.3, as an example**

✔ IEE Section 1 0 Background and Project Description

You may find it helpful to review the questions and guidance in Section 4 of the EDM, but you will need to interpret the questions generically

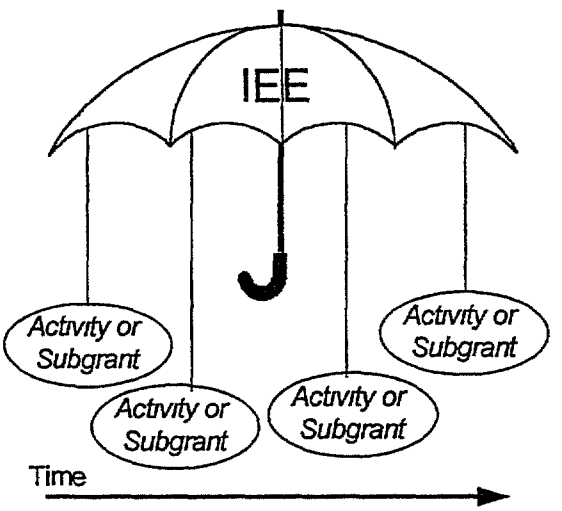
1 1 Background

Briefly describe the background of your suite/set of activities and the reasons why they are not well defined For example, is it because of the need to maintain design flexibility, is it because the activities to be undertaken will be in response to participant generated needs and proposals, or is it for other reasons?

1.2 Current Activity Description

Briefly describe the goals and purposes and types of results expected. Indicate the sectors in which you will work and the types of interventions that are likely Describe the level of funding, disbursement and implementation arrangements, including whether the activities are food for work, monetization or entail grants to communities or groups

Figure F 1 Multiple Activity DAP with Activities to be More Fully Designed at a Later Date



Prepare Umbrella IEE

- Negative Determination with Conditions (agreement between PVO/NGO & USAID)

- As part of conditions, PVO/NGO
  - demonstrates environmental assessment capacity (for example, through training or in other ways)
  - screens activities and sites as appropriate
  - follows environmental review process as part of planning & design
  - prepares monitoring & mitigation plans
  - PVO/NGO summarizes status of environmental compliance process as appropriate in annual Title II results report

1 3 Purpose and Scope of Amended IEE

Generally this is not needed unless you have already prepared an IEE and plan to amend it so that it uses the umbrella process

✓ IEE Section 2 0 Country and Environmental Information

Organize this section by location or activity, whichever is most appropriate This section should provide a brief overall portrait of the setting in those geographic areas where you are planning interventions Depending on the nature of your DAP or PAA, the "area" could be an entire country, several regions, scattered locations, or a specific region

Briefly describe environment (including physical, biological, health, socio-economic, and cultural aspects) of the proposed activities' locations Indicate general environmental issues and trends Because not all locations for future interventions have been identified and because of the variety of environmental situations that might be encountered, this section of the IEE can be neither comprehensive nor detailed.

✓ IEE Section 3 0 Evaluation of Project/Program Issues with Respect to Environmental Impact Potential

Describe impacts for each activity or sets of activities, using the same organizational framework you adopted for IEE Sections 1 and 2

If an activity has no impact potential, or a component may be a Categorical Exclusion, briefly note this

First, provide a brief synopsis of potential interventions You may simply list these and describe with whatever information you have Then describe, if you have information, the generic kinds of environmental impacts (For example, you could draw upon the generic information in the *Environmental Guidelines for Small-scale Activities)*

If your **knowledge of potential environmental impacts is limited, insert the following** or similar wording

> The physical and topographic conditions, climate, soils, and ecosystems as well as social and economic characteristics that could be encountered are quite variable Because the specific characteristics and locations of these activities are not definitive, the potential for adverse environmental impacts cannot be excluded until additional information about project design and location becomes available Each, therefore, requires environmentally sound design and review to determine the specific nature and magnitude of potential impacts Activities do share the common characteristic of being small in scale

In addition, you need to think about the potential for cumulative adverse environmental effects as a consequence of multiple activities in a setting or region—those impacts that result when the effects of your actions are added to the existing situation and or other reasonably foreseeable actions, regardless of what organization or agent is undertaking them. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time You probably will not be able to mitigate the effects of activities for which you are not responsible Nevertheless, where feasible, you should try to coordinate your activities with others, help others to recognize potential impacts of their activities or play a role in fostering an environmentally sound overall development plan

✓ **IEE Section 4 0 Recommended Mitigation Actions (Including Monitoring and Evaluation)**

Under an umbrella IEE, you and USAID commit to following specific procedures for screening, post-IEE environmental reviews, mitigation, and monitoring (see Figure F 1) You and USAID also commit to promoting environmental assessment capacity building for your staff and partners You could consider and adapt the language below, set off in smaller font and doubly indented, **for this purpose**[2]

4 1 Recommended Planning Approach

The development activities proposed for support are typically presented and considered as discrete interventions, in isolation from other planned community developments This linkage argues strongly for the adoption of an integrated approach toward activity planning and implementation. Although such an approach toward program planning and management is more complex and time-consuming "up-front," it will reap significant dividends over the longer term in the form of more cost-effective, sound, and sustainable community investments and improved natural resources management For maximum efficiency and effectiveness, these review procedures are intended to be applied within the context of development plans, natural resource management plans, or land use plans developed for the areas in which the activities will take place

4.2 Environmental Screening and Review

These environmental screening and review procedures specify how activities will be examined on an individual basis to comply with the determinations (see Section 5 0) of this IEE in accordance with Reg 216, Section 216 3(a)(2) These procedures are intended to result in environmental accountability and soundness, by requiring that USAID/[Insert Country name = C from here on] or the CS/sub-recipents put in place specific mechanisms to promote environmental review capacity and other environmental capacity for the implementing partners To ensure that interventions are designed in a sound and sustainable manner (see Section 4 1), the Mission Environmental Officer (MEO) and/or USAID Project Manager will work with the appropriate implementing partners to achieve compliance with these procedures

[Insert Cooperating Sponsor = S from here on] is the primary implementing partner of the [Provide DAP or PAA Title here =T from hereon] [Specify other implementing partners and their roles]

These procedures are based on use of a Screening Form, presented in Attachment 1 This form is consistent with the "Environmental Screening Form for NGO/PVO Activities and Grant Proposals" contained in the Africa Bureau Environmental Guidelines for Small-Scale Activities in Africa. USAID/__C__ will facilitate the refinement of this form with __S__ and the [Regional Environmental Officer (REO) Insert if one exists] and the Bureau Environmental Officer (BEO) to meet project needs and to incorporate, where appropriate, information that will identify ~~any~~ need for environmental assessment in accordance with __C's__ environmental assessment policy and procedures

Adherence to the procedures in this IEE cannot be considered in lieu of __C's__ requirements or vice versa Efforts will be made, however, in the refinement of the Screening Form to dovetail respective assessment information requirements to the maximum extent allowable

This IEE does not cover pesticides or other activities involving procurement, use, transport,

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2 The relationship between the CSs and USAID may differ from that characterized herein **The sample language is open to adaptation to the situation at hand**

storage or disposal of toxic materials, and any situation dealing with such will require an amended IEE, except to the extent covered in Category 2 of the Screening Form attached

Activities or proposals will be individually screened using the attached Screening Form, which uses a four-tier categorization process

Category 1 Activities that would normally qualify for a categorical exclusion under Reg 216 (e g , community awareness initiatives, training at any level, provision of technical assistance, controlled experimentation exclusively for the purpose of research, and field evaluation that is confined to small areas and carefully monitored, etc) Certain, specifically defined, small-scale activities entailing rehabilitation of water points and construction or rehabilitation of facilities have also been placed in this category

Category 2 Activities that would normally qualify for a negative determination under Reg 216, based on an environmentally sound approach to the activity design and incorporation of appropriate mitigation and monitoring procedures For example, the design followed, and the manager has access to and will follow, a series of guidelines for the design of small-scale, environmentally sound activities in forestry, natural resource management, infrastructure, etc

Category 3 Activities that have a clear potential for undesirable environmental impacts and typically under Reg 216 require an Environmental Assessment, such as those involving land development, planned resettlement, penetration road building, substantial piped water supply and sewage construction, large-scale irrigation projects, and projects involving the procurement and/or use of pesticides, or of large-scale or area-wide application of pesticides All activities listed in Reg 216 (Sect. 216.2[d][1]) are automatically included, unless they are small-scale and qualify for a negative determination in accordance with the criteria listed under Category 2

Category 4 This category groups activities that either USAID cannot fund or for which specific findings must be made in an Environmental Assessment prior to funding Interventions that are likely to jeopardize a critical habitat for threatened or endangered species or degrade a protected area must be placed in this category Category 4 covers activities that trigger provisions of Sections 118 or 119 of the Foreign Assistance Act, which generally relate to degradation of national parks or protected areas, introduction of exotic species, or effects on tropical or undegraded forest lands

__S__ will employ the Screening Form provided as Attachment 1 and to be refined as needed in consultation with the [REO Insert if one exists] or BEO and the Environmental Review Reports prepared as a result of the categorization process to evaluate activities and/or proposals Preferably, the direct or actual implementor of an activity will prepare the forms and the environmental reviews, which will be reviewed by__S__ prior to submittal to USAID/__C__ [Insert this sentence if appropriate Proposals seeking support from the__T__ must also comply with any of its approval criteria and review procedures, which will also include this requirement for environmental screening and review, as well as any other__S__ or USAID/__C__ requirements designed to ensure developmentally sound and sustainable activities for the __T__

An Environmental Review Report shall be prepared for all Category 2 activities The MEO or Mission Director, or Acting Director, on behalf of USAID/__C__ , shall be responsible for clearances on the category determination and Environmental Review Reports It is assumed that the majority of activities will fall within Categories 1 and 2, and will, therefore, be approvable locally by USAID/__C__ without further external review This delegation of responsibility, without regard to dollar amount of activities, is predicated on the assumption that appropriate and environmentally sound implementation and environmental monitoring and mitigation

procedures will be in place The MEO, should he/she have questions, will pass Category 2 activities and their reviews to the [REO Insert if one exists] and BEO for consultation An Environmental Review Report shall also be prepared as the first step for all Category 3 activities to help the [REO Insert if one exists] and BEO determine if an Environmental Assessment is required. While an Environmental Review Report may be prepared for Category 4 activities, it is recommended that developers of activities and proposals consult with the USAID MEO and Project Manager before preparing elaborate documentation. All Category 3 and 4 activities (if there are any) shall be subject to additional environmental evaluation,

as deemed appropriate, in consultation with the BEO and REO, and shall be passed on to the [REO Insert if one exists] and Bureau Environmental and Legal Officers for further review and clearance

Prior to the approval of an activity, results of the environmental categorization must be available and considered For Category 2 projects, Environmental Review Reports, including MEO review and, if needed, [REO Insert if one exists] or BEO review, must be performed prior to funding For any Category 3 or 4 activities, approval cannot be given until the Environmental Review and any additional environmental documentation as determined by the BEO have been prepared and cleared. __S__ may, if it desires, categorize or review categorization of activities, based on use of the screening form, prior to proposers receiving approval and proceeding with final design This procedure would allow activities in Category 1 (no environmental review required) to be carried out and allow the proposer to undertake appropriate environmental documentation according to the procedures for Category 2, 3, or 4 activities Hence, such awards will contain clauses stating that funding of Category 2, 3, or 4 activities is contingent on findings, recommendations and clearance of the environmental documentation

The MEO and/or Project Manager shall on a routine (semi-annual) basis pass to the [REO Insert if one exists] and BEO an updated summary of activities and the results of the environmental categorization and review process to keep them apprised of the type/nature, scale, funding levels, and implementation status of the individual activities approved under the process described in this IEE and any corresponding mitigation and monitoring requirements Reference to this process will also be made in the Mission's R4 submittal

4.3 Promotion of Environmental Review and Capacity-Building Procedures

The procedures described above and incorporated within the Screening Form are intended to ensure environmental accountability and soundness, on the assumption that the Mission has the following additional elements in effect to build environmental capacity with __S__ and its partners

- The proposer/implementing agent and its appropriate partners will help design, conduct, participate in, and apply environmental assessment and management training, in conjunction with USAID and host country resource organizations and agencies, such as the Regional Environmental Assessment Training Course, and pursue follow-up training to assist these partners in properly fulfilling the screening and review requirements in conjunction with concerned __C__ organizations and agencies,

- The proposer/implementing agent and its appropriate partners will also be encouraged to apply appropriate __C__ environmental assessment policies and procedures and

- A monitoring and evaluation process will be put in place and used by __S__ and its appropriate partners, in collaboration with any concerned __C__ authorities, and USAID project management.

4 4 Environmental Responsibilities

USAID/__C__ assumes responsibility for environmental review and decision-making for all USAID-assisted __T__ activities as outlined below

- Through __S__, and with the assistance of partners (as appropriate) proposers will submit proposals that take into consideration potential environmental impacts and their mitigation, including avoidance, and will design the activities with an environmental monitoring system in place

- __S__, with the assistance of partners (as appropriate), will use the Screening Form to categorize proposals, and the MEO will review and pass on to the [REO Insert if one exists] and BEO any Category 3 or 4 and, as he/she determines, some Category 2 activities

- The proposer/implementing agent for an activity, with the assistance of appropriate partners, will ensure implementation of agreed-on mitigating measures and environmental impact monitoring

- USAID/__C's__ MEO and the Project Manager will be ultimately responsible for monitoring environmental impacts of all project-financed activities, as further specified below (Section 4 5)

- Periodic visits of the [REO Insert if one exists] or BEO will also be requested for advice, refresher training, and confirmation that environmental processes are in place

4 5 Monitoring, Evaluation, and Mitigation

An **environmental monitoring, evaluation, and mitigation process** will be established and used by the implementing partners in collaboration with USAID USAID-supported activities shall incorporate appropriate mitigation and monitoring procedures as listed below

- The proposer/implementing agent and its partners will use the *Environmental Guidelines for Small-Scale Activities in Africa* (or other appropriate references) to assist them in determining what potential impacts should be of concern for different types of development activities in various settings Using the information from this and other documents cited therein, __S__ will determine which impacts to mitigate and monitor for the particular development activity

- The proposer/implementing agent and its partners must identify in each proposal and in the accompanying environmental review reports all proposed environmental mitigation and monitoring requirements

- Once the environmental review reports are approved, the mitigative measures and monitoring procedures stated in the environmental review report shall be considered a requirement.

- The implementing agent/partner, with assistance of other appropriate partners, shall be responsible for implementation of agreed-on mitigation measures and monitoring of impacts

  All periodic reports of the implementing partner, under these procedures, to USAID/__C__ shall contain a section on environmental impacts, success or failure of mitigative measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigative measures or monitoring procedures

USAID/__C__ is ultimately responsible for ensuring conformity with the procedures spelled out above, including environmental categorization and review procedures With particular respect to monitoring, evaluation and mitigation, the Mission is responsible for

- monitoring and evaluation of activities after implementation with respect to environmental effects that may need to be mitigated, a process that should be integrated into the Mission's pertinent

Performance Monitoring and Evaluation Plan,

- review of the implementing partner's reports with respect to results of environmental mitigation and monitoring procedures,

- incorporating into Mission field visits and consultations with implementing partners periodic examination of the environmental impacts of activities and associated mitigation and monitoring (assistance in preparing guidelines or with the monitoring and evaluation can be solicited from the [REO Insert if one exists] or BEO), and

reporting on implementation of mitigation and monitoring requirements as part of the summary of activities and their status that is passed to the [REO Insert if one exists] and BEO

✓ IEE Section 5 0 Summary of Findings

Incorporate the language below

This Initial Environmental Examination (IEE) satisfies the conditions of the environmental procedures for umbrella activities and delegation of environmental review responsibility to Missions for PVO/NGO umbrella-type projects (Cable 95 STATE 257896)

Environmental Determinations

Based on environmental review procedures, promotion of environment review, capacity building, and monitoring, evaluation, and mitigation procedures specified in this IEE, to which the Mission commits itself, the following environmental determinations are recommended

1 A **Categorical Exclusion** is recommended for project-financed technical assistance, training and education, institutional strengthening, regional communications and information exchange activities that have no physical interventions and no direct effects on the environment pursuant to 22 CFR 216.2(c)(1)(i) and 216 2(c)(2)(i), (iii) and (v) [Insert others if applicable] **The screening form will be used to confirm this determination for each activity** This categorical exclusion does **not** apply to education, technical assistance, or training if such includes activities directly affecting the environment, such as construction of facilities, per 216 2(c)(2)(i), **nor** to studies, projects, or programs intended to develop the capability of recipient countries to engage in development planning when designed to result in activities directly affecting the environment, per 216.2(c)(2)(xiv)

2 A **Negative Determination with Conditions** is recommended for all other activities entailing community development. This IEE specifies a set of steps to ensure adequate environmental review of USAID-supported activities, including capacity-building elements This negative determination is also conditioned on the provision of supplemental project technical assistance and training support to augment existing efforts These capacities will be developed and implemented in close collaboration with the USAID/__C__ and partners

Conditions

USAID's support for the ___T___ will follow a formalized environmental review process for its activities A key component of this review process is the use of a Screening Form (Attachment 1) to categorize activities, and review and screen them for potential environmental impacts

The USAID Mission assumes responsibility for environmental review, with clearance by the Mission Environmental Officer (MEO) or USAID Director or Acting Director in accordance with the environmental review procedures outlined herein for Category 1 and Category 2 activities All activities classified as Category 3 or 4, based on the procedures for categorization and review (in the unlikely event there are any), and possibly some in Category 2, at the discretion of the MEO, will be subjected to additional environmental review, as deemed appropriate, in consultation with the [REO Insert if one exists] and Bureau Environmental Officer (BEO), and will be passed to the Bureau Environmental and Legal Officers for further review and clearance

___S___ may, if it desires, categorize or review categorization of activities, based on use of the screening form, prior to proposers receiving approval and proceeding with final design This procedure would allow Category 1 activities that are in Category 1 (no environmental review required) to be carried out and for the proposer to undertake an appropriate environmental review in accordance with the procedures for Category 2, 3, or 4 activities No activities classified in Category 2, 3, or 4 will be funded until the environmental documentation required by this IEE has been prepared, reviewed, and cleared. Hence, such awards will contain clauses stating that funding for such activities is contingent on adherence to the findings and clearance of the environmental documentation

Partners implementing the __T's__ USAID-supported activities will help design, conduct, participate in and apply appropriate environmental assessment/design and implementation/mitigation procedures for each activity The Project will support appropriate environmental training and will do follow-up training to assist these partners in properly fulfilling this review requirement, in conjunction with concerned __C__ organizations and agencies

An environmental monitoring, evaluation and mitigation process shall be established and used by the implementing partners, including grantees, in collaboration with USAID Updated summaries of activities and their status, based on the procedures described in this IEE, will be submitted periodically to the REO and BEO to keep them apprised of the type, scope and implementation status of the activities and their corresponding mitigation and monitoring requirements Reference to this process will be made in the Mission's annual R4 submittal

This IEE does not cover pesticides or other activities involving procurement, use, transport, storage, or disposal of toxic materials, and any situation dealing with such will require an amended IEE, except to the extent covered in Category 2 of the screen form attached

Adherence to the procedures in this IEE is not in lieu of any environmental assessment procedures required by the __C__, nor can adherence to host country environmental procedures be substituted for compliance with the procedures in this IEE Efforts will be made, however, in the development or revisions of the Screening Form to dovetail respective assessment information requirements to the maximum extent allowable

Attachment to Annex F:

Environmental Screening & Report Form for NGO/PVO Activities and Grant Proposals

Background

USAID as a "re-engineered, learning institution," has introduced major changes in its new operations systems, with a strengthened focus on results (not activities), greater accountability and empowerment, teamwork, participation and customer orientation For example, projects are replaced with "results packages" provide USAID operating units and collaborators the flexibility they need to adapt to changes during implementation The underlying rationale is to focus on results, while still managing inputs and monitoring outputs properly, and to give those responsible (including the host country partners) for achieving results the flexibility to change approaches and tactics as situations change or lessons are learned.

The present Environmental Screening and Reporting Form (ESF) is designed to be consistent with the Initial Environmental Examination process, and to assist USAID Missions and their implementing partners design and implement activities in an environmentally sound manner in accordance with all salient agency policies and procedures Use of the ESF will greatly reduce the need for review and approval of activities at the regional or Washington levels

Introduction to Use of this Form

This form is to be utilized to screen activities based upon the umbrella IEE which is attached ***This form is intended to be adaptable to unique circumstances*** **Thus, its final contents and conditions of use are to be refined and jointly determined among the affected partners—PVO, NGO, USAID, host country agencies,** etc. To the extent possible, the form should reflect host government environmental policies and procedures

In using it, adjustments can be made in consultation with the Regional Environmental Officer (REO, if one exists) and Bureau Environmental Officer It is strongly advised that the Mission Environmental Officer make on-site visits prior to finalization of the ESF, and that the ESF be rational and fully defensible and without ambiguity as to how the conclusion was reached that the activity(ies) will have no significant impact

NOTE This form was designed by USAID's Bureau for Africa with PVOs carrying out activities under umbrella-type or co-financing grants in which there is a proposal review and sub-granting process The ESF is applied during the activity-design stage, and mitigation measures thereby identified are built into implementation. It has not yet fully evaluated or adapted for applicability to Title II programming contexts It may occur that CSs will provide grants to sub-recipients, and the ESF process could be adapted to determine the need for environmental mitigation. Also, the ESF could conceivably be adapted to downstream review of activities which are more fully designed after the DAP is approved

ENVIRONMENTAL SCREENING/REPORT FORM
FOR
NGO/PVO ACTIVITIES AND GRANT PROPOSALS
[to be adapted by PVOs to their situations]

PVO/NGO _____

Other Implementing Partner(s) [if appropriate] _____

_____

Activity Name _____

Duration (proposed start and completion dates) _____

Geographic Location. _____

Activity Description (paragraph(s) describing purpose/intermediate results and potential environmental impacts)

[add space as needed]

Determine the Nature of the Activity or Grant

a **Environmental Review Report Needed** Does the activity include funds to support any physical natural resource management activities (e g land clearing, irrigation), or any community and rural development services (e g., agroforestry, tree-planting), infrastructure (e g , dams or water catchments), public facilities (e g , water and sanitation systems), road construction or rehabilitation? Does it involve development of income-generating or resource management systems? It will likely require an Environmental Review of the kind described in Step 4 of this form. Determine which Category the grant falls under, to establish the need for the Environmental Review

b **No Further Environmental Review Required.** Does the activity exclusively provide technical assistance, training, institutional strengthening, or research, education, studies or other information analysis, awareness-building or dissemination activities *with no foreseeable negative impact on the biophysical environment*? This probably qualifies as a Category 1 activity—no further environmental review or action may be necessary Complete form to establish this circumstance

c. **Multiple Categories** Many DAP or PAA activities will have components in more than one category Simply mark all that apply The form will guide you to the appropriate next steps

Step 1 Determine Category of Activity

***Category 1*—no further environmental review needed**

Does the activity involve (mark yes, if applicable)

___ Provision of education, technical assistance, or training Does *not* qualify for "Category 1" if such programs include activities directly affecting the environment

___ Community awareness initiatives
___ Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha , i e , 10 acres) and carefully monitored (when no protected or other sensitive environmental areas could be affected)
___ Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats
___ Document or information transfers
___ Nutrition, health care or family planning Such programs do *not* qualify for "Category 1" if (a) some included activities could directly affect the environment (construction, water supply systems, etc) or (b) biohazardous (esp HIV/AIDS) waste is handled or blood is tested
___ Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected)
___ Construction or repair of facilities if total surface area to be disturbed is under 10 000 sq ft (approx 1,000 sq m.) (*and* when *no* protected or other sensitive environmental areas could be affected)
___ Support for intermediate credit arrangements (when *no* significant biophysical environmental impact can reasonably be expected)
___ Programs of maternal and child feeding conducted under Title II of Public Law 480
___ Food for development programs under Title III of P L 480, when <u>no</u> on-the-ground biophysical interventions are likely
___ Studies or programs intended to develop the capability of recipients to engage in development planning Do *not* mark "yes" if these involve activities directly affecting the environment

Category 2—**Negative environmental impacts possible, environmental review required (specific conditions, including monitoring, may be applied)**

Note· The Environmental Review (Step 4 below) must address why there will be no potential adverse impacts on protected areas, endangered or threatened species or their critical habitat, or relatively undegraded forest, i e , justify your conclusion that the proposed Category 2 activities do not belong in Category 3 or 4 Even for activities designed to protect or restore natural resources, the potential for environmental harm exists (e g , re-introduction of species, controlled burning, fencing, wildlife water points, spontaneous human population shifts in response to activities undertaken, etc) *If you do not find an exact match listed here for the activity you are undertaking, and it is not in Category 1, 3 or 4, then use the last item r Category 2 to describe the activity and treat it as Category 2 for purposes of environmental review*

Does the activity involve (mark yes, if applicable)

___ Small-scale activities in agriculture, natural resource management (NRM), sanitation, etc (*list and scale to be defined mutually among the appropriate partners*)
___ Controlled experimentation exclusively for the purpose of research and field evaluation *(areas of 4 ha or more,* i.e , 10 acres) and carefully monitored, when neither protected or other sensitive environmental areas could be adversely affected nor threatened and endangered species and their habitat jeopardized.
___ Small-scale construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq ft and funding level is not in excess of $200,000 and where no protected or other sensitive environmental areas could be affected
___ Minor construction or rehabilitation of rural roads less than ca. 10 km (with no change in alignment or right of way), with ecologically sensitive areas at least 100 m away from the road and not affected by construction or changes in drainage, likewise, no protected areas or relatively undegraded forest should be within 5 km of the road
___ Nutrition, health care or family planning, *if* (a) some included activities could directly affect the

environment (construction, water supply systems, etc) or (b) *biohazardous* (especially HIV/AIDS) *waste is handled or blood is tested*

___ Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use, not covered in Category 1, when neither protected or other sensitive environmental areas could be adversely affected nor endangered and threatened species jeopardized

___ Quantity imports of commodities such as fertilizers

___ Food for Development programs under Title II or III, involving known biophysical interventions with potential to cause environmental harm (e g , roads, bore holes)

___ Support for intermediate credit institutions when indirect environmental harm conceivably could result

___ Institutional support subgrants to NGOs/PVOs when the activities of the organizations are known and raise the likelihood of some environmental impact

___ Technical studies and analyses and other information generation activities that could involve intrusive sampling, including aerial surveys, of endangered species or critical habitats

___ Small-scale use of USEPA-registered least-toxic *general-use pesticides*, limited to NGO-supervised use by farmers, demonstration, training and education, or emergency assistance Environmental review must be carried out consistent with USAID Pesticide Procedures as required in Reg 16 [22 CFR 216 3(b)(1)]

___ Other activities not in Category 1 and not in Category 3 or 4 Specify

_____

_____

_____

Were the following used by the PVO/NGO in designing the above Category 2 activities (mark yes, if applicable)?

___*USAID Environmental Guidelines for Small-Scale Activities*

___Any applicable Programmatic Environmental Assessments

_____

_____

Other(s) _____

***Category 3*—Significant environmental impacts likely Environmental review required, and Environmental Assessment likely to be required**

Does the activity involve (mark yes, if applicable)

___ River basin or new lands development

___ Planned resettlement of human populations

___ Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas

___ Substantial piped water supply and sewerage construction

___ Major bore hole or water point construction

___ Large-scale irrigation

___ Water management structures such as dams and impoundments
___ Drainage of wetlands or other permanently flooded areas
___ Large-scale agricultural mechanization
___ Agricultural land leveling
___ Procurement or use of restricted use pesticides, or wide-area application in non-emergency conditions under non-supervised conditions
___ Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)
___ Potential to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Potential to jeopardize threatened & endangered species or adversely modify their habitat (especially wetlands, tropical forests)

The above Category 3 activities are consistent with USAID criteria for activities that normally require a USAID-specific document with a defined format and procedure, called the Environmental Assessment (EA) It is recognized that some of these categories are ambiguous Mark "yes" if they apply, and show in the Environmental Review (Step 4) the extent and magnitude of activities and their impacts, so that USAID can determine if an EA is necessary or not

***Category 4*—Activities not fundable or fundable only when specifically defined findings to avoid or mitigate the impacts are made, based on an Environmental Assessment**[2]

Does the activity involve (mark yes, if applicable)

___ Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp wetlands, tropical forests) [4]
___ Conversion of forest lands to rearing of livestock.
___ Planned colonization of forest lands
___ Procurement or use of timber harvesting equipment
___ Commercial extraction of timber
___ Construction of dams or other water control structures which flood relatively undegraded forest lands
___ Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands

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[1] Per Foreign Assistance Act Sect. 118 & 119 relating to overseas assistance affecting Tropical Forestry and Biodiversity

[2] Per USAID Environmental Procedures, §22 CFR 216 5 on Endangered Species

Step 2 Summarize and Itemize Activities List activities by all categories to which *Yes* was answered.

Category of activities as determined below (add entries as needed)

Activity/Sub-Activity	Funding	Category

Step 3 Determine Need to Prepare Environmental Review

If all activities are in Category 1, sign and date the form For any activities in Category 2 and 3, prepare an Environmental Review Report assessing all of these activities' impacts For Category 3 activities, further documentation would be required, once USAID has confirmed the applicability of Category 3, based on the Review If Category 4 is possible, consult USAID before proceeding with the Environmental Review to determine if activities can be funded and/or whether required EA findings (according to Sections 118 and 119 of the Foreign Assistance Act) could be made

For all Category 2 and 3 activities, proceed to Step 4 to prepare Environmental Review

Step 4 Prepare Environmental Review

Suggested Format for Environmental Review

The Environmental Review should be about 5-10 pages long (more if required) and consist of the following sections

1 **Background, Rationale and Outputs/Results Expected**—summarize and cross-reference proposal if this information is contained therein

2 **Activity Description**—Succinctly describe location, siting, surroundings (include a map, even a sketch map) Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e g , road to a facility, need to quarry or excavate borrow material, need to lay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location) If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these

3 **Environmental Situation**—Affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities

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4 **Evaluation of Activities and Issues with Respect to Environmental Impact Potential**—Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e g , air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc) Indicate beneficial impacts and how the environment will be improved.

5 **Environmental Mitigation Actions** (including **monitoring and evaluation**)—For example, indicate means taken to avoid, reduce or compensate for impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents Indicate how mitigative measures will be monitored to ensure that they accomplish their intended result or what monitoring might be needed for impacts that one is uncertain about

6 **Other Information** (as appropriate)—where possible, include photos of the site and surroundings, list the names of any reference materials or individuals consulted.

Note Specific plans for monitoring of key environmental indicators and mitigation of impacts during activity implementation are especially important, these must be addressed in the review Information on monitoring results and mitigation of impacts are to be included in all progress reports Important information and a criterion for evaluation of environmental soundness is showing how the activity is part of or guided by an integrated, community-based resource and land use plan or planning and management framework that considers the appropriate use of multiple resources

Drafted by _____ Date _____

Internally reviewed by _____ Date _____

Clearances (modify as appropriate)

Title II or FFP Officer _____ Date _____

Mission Environmental Officer (including recommendation that an EA be prepared, if called for)
_____ Date _____

USAID Mission Director (if responsibility not delegated to MEO)
_____ Date _____

Attachment [applicable PVO DAP/PAA umbrella IEE]

Annex G

USAID Pesticide Procedures and USEPA Pesticide Registration Status

Excerpted and slightly modified from Appendix C "Safe Pesticide Use Guidelines" in *Environmental Guidelines for Small-scale Activities in Africa*

Annex G. USAID's Pesticide Procedures

USAID's Pesticide Procedures derive from the only Environmental Impact Statement (EIS) thus far conducted on USAID's programs The EIS was the result of a legal challenge to USAID's policies regarding the provision of pesticides, brought in 1975, by the Environmental Defense Fund and three other environmental NGOs This EIS also stimulated the Agency to develop comprehensive regulations governing environmental assessment of all its activities, known as the Environmental Procedures (22 CFR 216), or Reg 216

If USAID's resources are proposed for any activities that will involve assistance for the procurement or use, or both, of pesticides, planners must take into account these procedures "Use" is interpreted broadly to include the handling, transport, storage, mixing, loading, application, clean up of spray equipment, and disposal of pesticides It also encompasses supplying fuel for transport of pesticides, and providing technical assistance in pesticide management. In contrast, support to limited pesticide research and pesticide regulatory activities are not subject to scrutiny under the pesticide procedures

USAID finances pesticides only on a case-by-case basis (and not on the basis of an approved commodity list) and then only after specific additional evaluation that would consider the potential benefits conferred by the use of the proposed pesticide The kinds of factors to be considered in such an assessment should include, but not necessarily be limited to, the following (22 CFR 216 3 (b)(1)(i)(a-l)

- USEPA's registration status of the requested pesticide(s),
- basis for selection of the requested pesticide(s),
- extent to which the proposed pesticide use is part of an IPM,
- proposed method or methods of application, including availability of appropriate application and safety equipment,
- any acute and long-term toxicological hazards, either human or environmental, associated with the proposed use and measures available to minimize such hazards,
- effectiveness of the requested pesticide(s) for the proposed use,
- compatibility of the proposed pesticide(s) with target and nontarget ecosystems,
- conditions under which the pesticide(s) are to be used, including climate, flora, fauna, geography, hydrology, and soils,
- availability and effectiveness of other pesticides or nonchemical management methods,
- requesting country's ability to regulate or control the distribution, storage, use, and disposal of the requested pesticide(s),
- provisions made for training of users and applicators, and,
- provisions made for monitoring the use and effectiveness of the pesticide(s)

USAID's pesticide procedures require an IEE as a minimum for any proposed use of pesticides that are registered, without restrictions, for the same or similar uses in the U S by USEPA (Table G 1) Any proposed pesticide use that does not conform to such standards will require an Environmental Assessment or Environmental Impact Statement unless the restriction is based on user hazard only and other conditions are met. Table G 1 summarizes the review requirements of the various categories of pesticides Pesticides **canceled or suspended** by USEPA (Table G 2) are highly unlikely to be approvable for use in a USAID project, even with an EA On the other hand, products classified as **Restricted Use Pesticides** by USEPA (Table G 3)

conceivably could be approved for use in USAID projects, with full justification through an EA, but this is not advised, and is rather unlikely to happen in practice

As an example, if a country requested financing for pesticides, it would be encouraged to use products registered for the same or similar uses in the United States If no such products existed, the environmental review requirements would become progressively more stringent as one moved from previously registered to never registered pesticides (see Table G 1)

It is important to understand that in Table G 2, "canceled" means that a pesticide product's sales, distribution and use have been stopped. "Suspended' products have at least some formulations and registrations which are at least temporarily halted due to perceived hazards The term "restricted" in Table G 2 refers to changes in product uses required by the USEPA as a condition to renew or reregister a product In contrast, the "**Restricted Use**" pesticides (RUPs) listed in Table G 3 are those which, *in the United States,* may only be purchased or applied by well-trained and officially *certified* applicators or under their direct supervision on the basis of health and/or environmental risk criteria. This designation is assigned to a pesticide product because of its relatively high level of potential human and/or environmental hazard

USAID recognizes that pesticides have a potential (though not necessarily primary) role in managing pests in developing countries This observation has particular relevance to Africa. Many of its farmers use either no pesticides or egregiously "inappropriate" pesticides Consequently, the availability of even small amounts of environmentally appropriate pesticides, used properly, might contribute to meaningful increases in production in a region that is especially prone to pest-related crop losses Moreover, USAID's financing of selected pesticides in the context of an IPM system would help assure that USAID would have the opportunity to influence pest management strategies by remaining an actor in the process

USAID also recognizes that pest problems in developing countries do not mirror exactly those found in the United States Whereas some pesticides might be entirely inappropriate for use in the United States and thus not registered with the USEPA, these pesticides might be ideal for tsetse flies or desert locusts in Africa. Similarly, developing countries have crops, diseases, habitats, and other pests that are not found in the United States The implication, of course, is that the registration status of pesticides in the United States should not routinely or automatically apply to developing countries because conditions are often considerably different from conditions in the United States

IPM is placed at the heart of USAID's intended pest management strategies Other elements of USAID's strategy include the strengthening of pest-management infrastructures in developing countries, improvements in schemes for regulation of pesticide usage, the monitoring of the human and environmental effects of pesticides, and efforts to exert a greater degree of U S leadership among the international community Finally, USAID does not finance the procurement of pesticides through nonproject assistance (i e , through its Commodity Import Program)

The use of *plant-derived pesticides* not registered with USEPA, such as nicotine-based commercial products, may not be promoted under a USAID project. Some botanical insecticides, such as infusions of ground rope tobacco and soap can result in a highly toxic product and should not be extended to smallholder farmers (Fisher et al 1994) A list of botanical insecticides currently registered by USEPAas of 1994 is shown in Table G 4

Table G 1. Classification of Candidate Pesticides for Specific Evaluation

Categorization in terms of Proposed Use and USEPA Regulatory Status	Review Requirements in accordance with USAID Regulation 216
1 Pesticide to be used for research or limited field evaluation purposes only, irrespective of its current regulatory status in United States	IEE[b]
2 Projects involving demonstration or use of pesticides for specified use	IEE[b]
(a) Pesticide registered for same or similar uses[a] in the United States without restrictions	IEE[b]
(b) Pesticide registered for same or similar uses [a] in United States, restricted on basis of user hazard	IEE and, if approved, user hazard warning to and certification of awareness from recipient[b]
(c) Pesticide registered for same or similar uses[a] in the United States, restricted on basis of environmental hazard	IEE plus EA or EIS[c]
(d) Pesticide registered for same or similar uses[a] but currently under presumption against reregistration, notice of intent to cancel, or subsequent notice of intent to suspend issued by USEPA.	IEE plus EA or EIS [c] and, if approved, notice of impending action to recipient.
(e) Pesticide previously registered for same or similar uses[a] but canceled for environmental hazard	IEE plus EA or EIS[c]
(f) Pesticide previously registered for same or similar uses[a] but canceled for health reasons	IEE plus EA or EIS[c]
(g) Pesticide registered for a different use in United States	IEE plus EA or EIS[c]
(h) Pesticide not registered for any use in United States, but tolerances established	IEE plus EA or EIS[c]
(i) Pesticide not registered for any use in United States, no tolerances established	IEE plus EA or EIS[c]

[a] Similar use is defined to include the use of a substantially similar formulation in a comparable use pattern The term use pattern includes target pest, crop or animals treated, application site, and application technique rate and frequency
[b] Pesticides in this category will not ordinarily be subject to further analysis however the decision to undertake such analysis will be made on a case-by-case basis
[c] Pesticides in this category will following the IEE, automatically trigger an EA as a minimum or an EIS the choice of which will continue to be governed by USAID Regulation 216
Abbreviations IEE Initial environmental examination, EA Environmental assessment EIS Environmental impact statement; USEPA U S Environmental Protection Agency
Source USAID 1976a in Tobin 1994

Table G 2 Pesticides Canceled, Suspended or Restricted by USEPA

The following is a list of generic or accepted common names for pesticides—at least some of whose uses are suspended, canceled, or restricted[1] in the United States by the U S Environmental Protection Agency (USEPA) Note that thousands of trade names exist, few of which appear on this list. Carefully examine the label of any pesticide to ascertain whether the accepted common (or generic) name appears on this list. Note **A generic products name's presence on this list does not necessarily mean that all registered uses are limited**

Alar
Aldrin
Amitraz
Arsenic Trioxide
Benomyl
BHC
Bromoxynil
Bromoxynil Butyrate
Cadmium
Calcium Arsenate
Captafol
Captan
Carbon Tetrachloride
Chloranil
Chlordane
Chlordimeform
Chlorbenzilate
Copper Arsenate
Creosote [some registered uses]
Cyanazine
Cyhexatin
Daminozide
DBCP
DDD (TDE)
DDT
2,4-D [some registrated uses]
Diallate
Dicofol
Dieldrin
Dimethoate
Dinocap
Dinoseb
EBDCs
EDB
Endrin
EPN
Fluoroacetamide
Heptachlor
Kepone
Lead Arsenate
Lindane
Mercury
Metaldehyde
Mirex
Monocrotophos
OMPA
10,10' Oxybisphenoxarsine
Oxyfluorfen
Parathion
PCNB
Pentachlorophenol
Phenarsazine Chloride
PCBs
Polychlorinated Terphenyls
Pronamide
Safrole
Silvex
Sodium Arsenate
Sodium Arsenite
Sodium Cyanide
Sodium Fluoride
Sodium Monofluoroacetate
Strobane
Strychnine
2,4,5-T
2,4,5-TCP
Thallium Sulfate
TOK
Toxaphene
Tributyltin
Trifluralin
Vinyl Chloride
Wood Preservatives Calcium Arsenate Creosote, Pentachlorophenol Sodium Arsenate, and Sodium Arsenite

Source USEPA 1990

[1] "Restricted" refers to limitations on product uses as a condition to register or re-register

Table G 3 Pesticides Classified as Restricted Use by USEPA*

Acetamide
Acetic acid
Acetochlor
Acrolein
Arylonitrile
Alachlor
Aldicarb
Allyl alcohol
Alpha-clorohydrin
Aluminum phosphide
Amitraz
Amitrole
Arsenic acid
Arsenic pentoxide
Atrazine
Avermectin
Avitrol
Azinphos methyl
Bendiocarb
Benzoic acid
Biphentrhin
Bis (Tributyltin) oxide
Brodifacoum
Butylate
Cadmium chloride
Calcium cyanide
Carbofuran
Carbon dioxide
Carbon tetrachloride
Chlordane
Chlordimeform
Chlorfenvinphos
Chlorobenzilate
Chlorophacinone
Chloropicrin
Chlorothalonil
Chlorothoxyfos
Chlorpyrifos (EC on wheat)
Chromic acid
Clofentezine
Coal tar
Coal tar creosote
Copper oxychloride
Coumaphos
Creosote
Creosote oil
Cubé resins other than rote
Cupric oxide
Cuprous oxide
Cyanazine
Cycloheximide
Cyfluthrin
Cyhalothrin
Cypermethrin
DBCP
Deltamethrin
Demeton
Diallate
Diazinon
Dichloropropene
Diclofop methyl
Dicrotophos
Diflubenzuron
Dioxathion
Diphacinone
Disulfoton
Dodemorph
Endrin
EPN
EPTC
Ethion
Ethoprop
Ethyl parathion
Ethylene dibromide
Ethylene dichloride
Fenamiphos
Fenbutatin-oxide
Fenitrothion
Fenpropathrin
Fensulfothion
Fenthion
Fenvalerate
Flucythrinate
Fluoroacetamide
Fluvalinate
Fonofos
Hydrocyanic acid
Hydrogen cyanamide
Imazaquin
Isazofos
Isofenphos
Lambda-cyhalothrin
Lindane
Magnesium phosphide
Methamidophos
Methidathion
Methiocarb
Methomyl
Methyl bromide
Methyl isothiocyanate
Methyl parathion
Metolachlor
Mevinphos
Monocrotophos
Niclosamide
Nicotine
Nitrogen, liquid
Oxamyl
Oxidemeton methyl
Paraquat
Pentachlorophenol
Permethrin
Phorate
Phosacetim
Phosalone
Phosphamidon
Phostebupirin
Picloram
Picloram, isooctyl ester
Picloram, potassium salt
Picloram, triisopropanolam
Piperonyl butoxide
Potassium
pentachlorophenate
Profenophos
Pronamide
Propanoic acid
Propetamphos
Resmethrin
Rotanone
S-Fenvalerate
Simazine
Sodium arsenate
Sodium cyanide
Sodium dichromate
Sodium fluoroacetate
Sodium hydroxide
Sodium
methyldithiocarbamate
Sodium pyroarsenate
Starlicide
Strychnine
Sulfotepp
Sulfuric acid
Sulfuryl fluoride
Sulprofos
Tefluthrin
TEPP
Terbufos
Tergitol
TFM
Toxaphene
Tralomethrin
Tributyltin fluoride
Tributyltin methacrylate
Trifluralin
Triphenyltin hydroxide
Zinc phosphide

* From USEPA s Restricted Use Pesticide (RUP) List 12/06/95 This list contains only accepted common generic names Trade names are far more numerous

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Table G 4 Botanical Insecticides Registered by EPA*

Insecticide name	Derivation	Registration	Toxicity Category	LD50 Oral/Dermal (mg/kg)
Azadirachtin	*Azadirachta indica*	Align on fruits/vegs roots tubers "Margosan" & others on ornamentals	IV	>5000/>2000
Capsaicin	*Capsicum frutescens*	Hot Sauce animal repellant	III	-/-
Garlic	*Allium sativum*	Garlic Barrier' on vegs, citrus	-	-/-
Sesame oil	*Sesamum indicum*	'Sesamex' a pyrethrum synergist	III	2000 to 2270/-
Pyrethrum	*Chrysanthemum cineranaefolium*	many products stored food grains pets	III	1500/ >1800
Ryania	*Ryania speciosa*	many products citrus thrips Eur corn borer codling moth	III	1200/-
Sabadilla	*Schoenocaulon* sp		III	-/-
Rotenone	*Derris Tephrosia Lonchocarpus*	many products garden dusts animal ticks	III I	132 to 1500/- EC formulation

*From Fisher et al 1994 Supplemental Environmental Assessment of Pesticide Use by PVOs in Mozambique USAID/Mozambique and USAID/AFR/SD

Note Hyphens indicate data are not available See Table C 10 in Knausenberger et al 1996 (p 160) for the definitions of each toxicity category

Annex H

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Publishes Appendix I Methods and Tools of The World Bank Participation Sourcebook. This appendix includes the following information on Participatory Rural Appraisal key tenets of PRA, sequence of techniques, organization of PRA, and PRA tools

www unv org/projects/highland/praw html
Contains part II of United Nations Volunteers report on Participatory Rural Appraisal Workshop Entitled "Principles for a proposed participatory rural appraisal model and implications for practice "

ntl ıds ac.uk/eldıs/pra/prabıb htm
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